

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 11:33 AM  
**To:** Meisinger, Nick  
**Subject:** Fw: March 24 BCHD BOD Public Meeting

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**From:** Abbes Khaki <abbkh3@aol.com>  
**Date:** March 23, 2021 at 1:47:05 PM PDT  
**To:** Tom Bakaly <Tom.Bakaly@bchd.org>  
**Subject:** March 24 BCHD BOD Public Meeting

AK1-1

Hi Tom. Thank you for providing hard copy of DEIR. I will skip the meeting at this time. DEIR is quite comprehensive. I will provide my final assessment in writing later. However, if I am forced to choose, I will take Alternate 4 which is the same as original phase 1 but excludes vehicular access to Flagler Lane and, also, eliminates original phase 2. For the record I am adamantly and totally against Alternative 6 and original phase 1 that utilizes the Flagler Lane for vehicular entry and exits.  
Thanks, Abbes G Khani

Sent from my iPhone

On Mar 23, 2021, at 12:45 PM, Tom Bakaly <Tom.Bakaly@bchd.org> wrote:

Hi Abbes - you can access the Board meeting via the phone number that Cristan provided. Our buildings are not open to the public and you therefore cannot view the meeting from our facilities. We were pleased to hand deliver a printed copy of the Draft EIR to you and to waive the copying fee. Please note that no decisions will be made at the March 24th meeting and the draft EIR comment period ends June 10, 2021. We encourage you to participate by phone on March 24th or submit comments in advance.  
Thanks

Sent from my iPhone

On Mar 23, 2021, at 5:41 AM, Abbes Khaki <abbkh3@aol.com> wrote:

Dear Mr. Tom Bakaly, public meetings without public participation is meaningless. I am committed to participate in March 24 BCHD BOD public meeting. I have no computer skills and access to a computer to participate in a virtual meeting. Therefore, I am requesting access to one of BCHD facilities that facilitates my participation. Your efforts to provide such access would be greatly appreciated.

Abbes G Khani

Sent from my iPhone



## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 11:36 AM  
**To:** Meisinger, Nick  
**Subject:** Fw: DEIR

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**From:** Abbes Khaki <abbkh3@aol.com>  
**Sent:** Thursday, March 25, 2021 11:14 AM  
**To:** EIR <eir@bchd.org>  
**Cc:** Tom Bakaly <Tom.Bakaly@bchd.org>; Vanessa I. Poster <Vanessa.Poster@bchd.org>; Michelle Bholat <Michelle.Bholat@bchd.org>; jane.diel@bchd.org <jane.diel@bchd.org>; Martha Koo <Martha.Koo@bchd.org>  
**Subject:** DEIR

Mr. Nick Meininger,

I listened to your presentation last night via phone. I couldn't express my opinion due to my technical inabilities. You outlined in your presentation and in writing on page ES-45 and in Table ES-2, outlined that Alternative 4 is superior to Project phase 1, yet the DEIR report has it as Alternative rather than Project. It's noteworthy to mention; in Alternative 4 the vehicular access to HLC is via Beryl, versus Project Phase 1 showing vehicular access to HLC via Flagler Lane (which public and City of Torrance Development Planning Commission opposed in 2019 during NOP review). Figure 2-8 page 2-33 shows Phase 1 vehicular accesses via Flagler Lane.

Sent from my iPhone

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:27 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD DEIR Omission

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**From:** Abbes Khan <abbkh3@aol.com>  
**Sent:** Thursday, June 3, 2021 12:54 PM  
**To:** EIR <eir@bchd.org>; CouncilMeetingPublicComment@torranceca.gov  
<CouncilMeetingPublicComment@torranceca.gov>  
**Subject:** BCHD DEIR Omission

My name is Abbes Khani, I am a resident of the city of Torrance since 1989.

BCHD, City of Redondo Beach elected officials, and Wood Environmental Company have no jurisdiction over my family and have no statutory authority to negatively impact our lives in any shape or manner. My sincere suggestion is that HLC project be banned and all activities cease all together and immediately. However, I am aware that I have no voice in this matter. Therefore, I am going to document what is missing in DEIR. BCHD's consultant company, Wood, being well aware of Real Estate value decline of the adjacent residential neighborhood, by consent of BCHD's CEO, deliberately have not addressed the neighborhood's Real Estate valuation impact in their DEIR. Approval of any such project needs to address remedial/monitory compensations for adversely impacted neighbors. To illustrate the property decline, I will disclose the following information:

I placed my property at 5674 Towers street on market for sale on 11/6/2019. All potential buyers withdrew their interest from buying my property upon learning about outstanding BCHD HLC RCFE. As the result, by consent of my real estate agent, I removed my property from listing on 11/23/2019 hoping the issue will be rectified, in near future, by responsible authorities. To document the potential detrimental impact of BCHD RCFE, I am providing, as attachment, a copy of "Addendum No. 1" prepared by my brokerage firm to this effect at that time. Shall Wood Company fail to address such property value decline in their final revision of EIR, I will reserve my right to seek financial compensation from Wood Company in a civil court of law.

With Great Concern,  
Abbes G Khani



CALIFORNIA  
ASSOCIATION  
OF REALTORS®

## ADDENDUM

(C.A.R. Form ADM, Revised 12/15)

No. 1

The following terms and conditions are hereby incorporated in and made a part of the: ☐ Purchase Agreement, ☐ Residential Lease or Month-to-Month Rental Agreement, ☐ Transfer Disclosure Statement (Note: An amendment to the TDS may give the Buyer a right to rescind), ☒ Other Listing agreement  
dated November 6, 2019, on property known as 5674 Towers St  
Torrance, CA 90503-1162

in which \_\_\_\_\_ is referred to as ("Buyer/Tenant")  
and Abbes Khani Ghasem, Sadie Ghasem is referred to as ("Seller/Landlord").

To whom it may concern,

The property at 5674 Towers St., Torrance, CA 90503 was put on the market through my brokerage on 11/6/19 and removed from the market on 12/23/19.

During that time the following happened:

10 Open Houses  
151 parties through  
12 agent showings with clients

We received one written full price offer at \$1,220,000 but the buyer withdrew when they read about the health district expansion.

We then reduced the price to \$1,120,000 and received a verbal offer. When I asked the agent to disclose the health district expansion the buyer decided not to write the offer.

We then received a low ball offer of \$1,020,000 and we rejected. This is well below the fair market value that would have received if there was not the threat of the health district expansion.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:36 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: DEIR Comments  
**Attachments:** Aesthetics.docx; ALTERNATIVES.docx

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** alan archer <alarch2003@yahoo.com>  
**Sent:** Monday, June 7, 2021 3:51 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** DEIR Comments

These are my comments on the bchd DEIR report. they cover the Aesthetics and Alternates portion of the DEIR.

Alan Archer

Comments on the BCHD DEIR  
**Surrounding Land Uses**

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

AA-1

Single-family residences face North Prospect Avenue opposite the Project site to the southwest, in an area zoned R-1 (Single Family Residential) by the City of Redondo Beach, and multi-family residences exist to the north along Beryl Street, in an area zoned RMD (Medium Density Multi-Family Residential) by the City of Redondo Beach. The nearest multi-family residences to the Project site are located approximately 110 feet north of the vacant Flagler Lot across Beryl Street. Other multiple-family residences along Beryl Street are located approximately 250 to 500 feet to the north of the Project site, with intervening buildings associated with the Redondo Village Shopping Center (refer to Figure 2-2). Additionally, the Project site is bordered by single-family residences to the east across Flagler Lane and Flagler Alley, in an area zoned R-LO (Low Density Residential) by the City of Torrance (refer to Figure 2-2). The closest of these single-family residences is located approximately 80 feet from the developed edge of the campus. Open space and recreational land uses in the vicinity of the Project site include Dominguez Park adjacent to and northeast of the Project site across the intersection of Beryl Street & Flagler Lane; Entradero Park approximately 1,350 feet to the east, Sunnyside Park approximately 1,125 feet to the southeast; and the Edith Rodaway Friendship Park approximately 2,750 feet to the northwest of the Project site (see Section 3.13, *Public Services*). The following schools are also located in the vicinity of the Project site: Towers Elementary School, approximately 300 feet to the east; West High School, located approximately 2,600 feet to the southeast; Parris Middle School, approximately 2,150 feet to the south; Redondo Union High School and Redondo Shores High School, approximately 1,400 feet to the southwest; and Beryl Heights Elementary School, located approximately 900 feet to the west (see Section 3.13, *Public Services*).

**DEIR Page(s):141**

**2.4.3 Project Objectives**

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

AA-2

**Health**

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

**Livability**

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

#### Community

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

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

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

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

Draft EIR Section Title: 3.1 Aesthetics and Visual Resources

### **3.1 AESTHETICS AND VISUAL RESOURCES**

This section of the Environmental Impact Report (EIR) discusses the potential environmental effects of the proposed Beach Cities Health District (BCHD) Healthy Living Campus Master Plan (Project) on aesthetics and visual resources as defined by the California Environmental Quality Act (CEQA), but with consideration of the regulations, policies, and design guidelines of the City of Redondo Beach and City of Torrance. This analysis includes an assessment of photosimulations independently prepared for the EIR by VIZf/x, architects and visual simulation specialists, for the

AA-2  
(cont.)

AA-3



Phase 1 preliminary site development plan as well as representative views provided by Paul Murdoch Architects for the more general Phase 2 development program. These photosimulations and representative views were reviewed in the context of the development standards under the Redondo Beach and Torrance General Plans and municipal codes. Additionally, based on the comments received during the 30-day public scoping period, this discussion also includes an analysis of potential impacts related to shading of adjacent shadow-sensitive uses. A shade and shadow study was prepared to determine the extent and duration of shading given the height of the proposed buildings in the context of the surrounding topography and low-rise development (see Appendix M).

Under CEQA, aesthetic impacts are qualitative in nature, and generally occur where physical change would conflict with adopted development standards and would substantially degrade the visual character or quality of public views of the site and its surroundings.

#### Existing Public Views of the Project Site

AA-3  
(cont.)

Public views of the Project site are generally confined to those available from immediately adjacent streets, sidewalks, and Dominguez Park. Views from streets even one block away are obscured by intervening structures. **For example, views from Sunnyglen Park are completely blocked by intervening 1- to 2-story single family residences and neighborhood serving commercial development. (This is a false statement. There are many area's in the park where the site can be seen!).** Views of the existing buildings and surface parking lots on-site from North Prospect Avenue, Beryl Street, Dominguez Park, Flagler Lane, and Diamond Street are generally uninterrupted and only sometimes partially obscured by street trees, other landscaping, utility infrastructure (e.g., wooden poles and electrical lines), and traveling cars.

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

#### Visual Character and Visual Quality

AA-4

Visual conditions refers to the visual character and visual quality of a particular area, such as design, size, shape, color, texture, and general composition of major physical features, as well as the relationships between these elements. In general, visual features often consist of unique or prominent natural landmarks (e.g., mountain peaks and hills,

bodies of water, stands of trees) or man-made/urban attributes (e.g., individual buildings, public art, or the downtown skyline) that are visually interesting or appealing. Visual character refers to the physical characteristics such as landforms, architecture and other distinguishing visual features, while visual quality is associated with a viewer's perception of the physical characteristics and can contribute to the viewer's visual experience and appreciative enjoyment of the environment. Visual character is described for individual areas within and adjacent to the project site, and visual quality can be assessed as high, moderate and low, as described below:

- High – Areas must be vivid, memorable, distinctive, unique (in a positive way), and intact—they can be natural, park-like, or urban (with urban areas displaying strong and consistent and or/notable architectural and urban design features).
- Moderate – Areas are generally pleasant appearing but are characterized as common or ordinary and might lack dramatic or memorable features.
- Low – Areas may be visually out of place, lack visual coherence, do not have compositional harmony, and contain eyesore elements.

### **Regional Setting**

AA-4  
(cont.)

The project site is located within the City of Redondo Beach (City), which is a South Bay coastal community at the southern terminus of Santa Monica Bay, north of the Palos Verdes Hills, and southwest of the Los Angeles International Airport. The area surrounding the project site is primarily urbanized in character, with a variety of residential development of varying densities and commercial strip businesses, retail, restaurants as well as parks.

To the North and immediately below the site is the commercial strip business area which fronts on Beryl Ave. The North side of Beryl Ave. consists of predominately rental apartment buildings and a landscaping business that ends at 190<sup>th</sup> Street in between Flagler Ave on the East and Prospect Ave to the West.

To the South of the project site are single family residences that sit below the project site.

To the West of the project site are single family residences that sit below the project site to varying degrees.

To the East the Pacific South Bay housing tract starts at Flagler Ave/Beryl Ave on the edge of the project site which sits approximately 30 feet above street level of the 1<sup>st</sup> houses in the tract. The remainder of the tracts housing drop another 25 to 30 feet below Flagler Ave. Towers Elementary school which sits to the east of the site and fronts onto Beryl Ave while being surrounded by the Pacific South Bay housing tract.



### Existing Visual Conditions

AA-4  
(cont.)

The project site comprises approximately 9.78 acres of BCHD-owned or managed land in the Redondo Beach area. While the development includes 5 to 6 story tall buildings these are set back towards the center of the site. Residential development, buildings within the area are typically one to two stories, along with a few three-story apartments. Development in the area largely supports residential uses (such as small shops and restaurants), associated surface parking.

### 3.1.4 Project Impacts and Mitigation Measures (page 231)

Impact Description (VIS-1)

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

**VIS-1 The proposed Residential Care for the Elderly Building included in the Phase 1 preliminary development plan would interrupt public view of the Palos Verdes hills from the highpoint at 190<sup>th</sup> Street and Flagler Lane. However, a reduction in the height, (In the Height?), of the building would reduce this impact to less than significant with mitigation. REALLY???**

AA-5



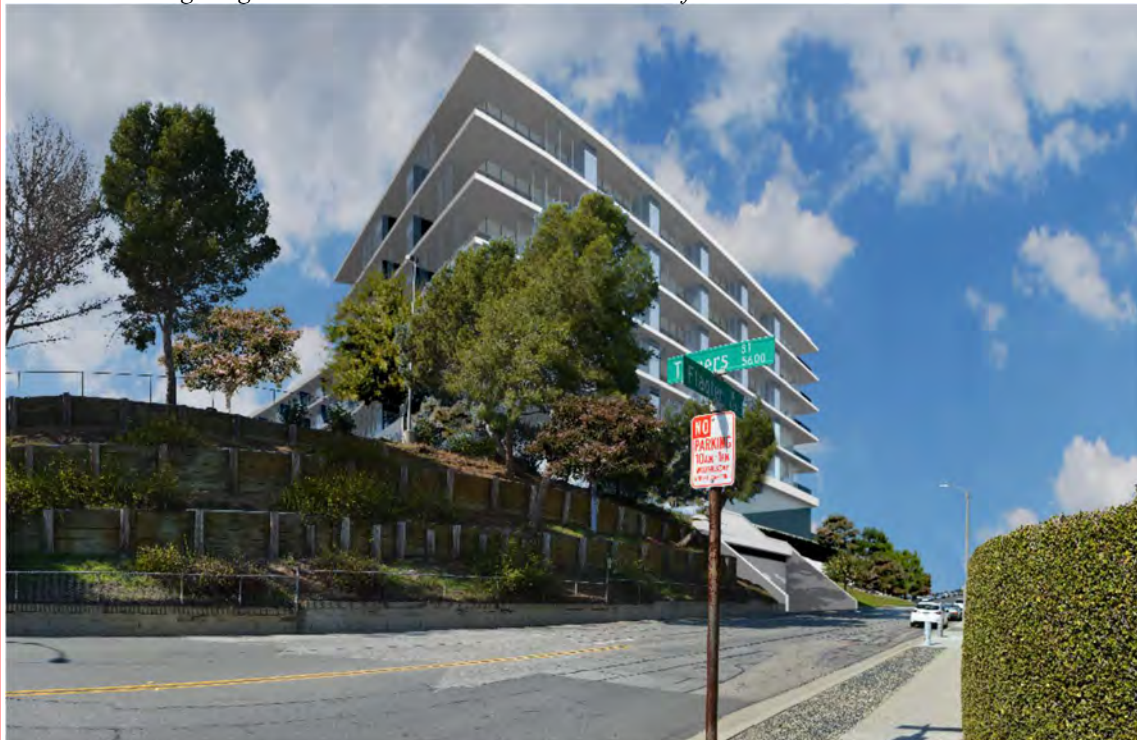
*This is called less than significant with mitigation. Using the Palos Verdes hills as a Distraction! The size of this proposed building is massive and does not belong in a predominately residential neighborhood!*

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



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

AA-5  
(cont.)





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



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



AA-5  
(cont.)

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

Does this actually fit/belong in a predominately residential area ???

**However, a reduction I the eight, (In the Height?), of the building would reduce this impact to less than significant with mitigation. REALLY???**



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



This is called less than significant with mitigation. **Using the Palos Verdes hills as a Distraction. The size of this proposed building is massive and does not belong in a predominately residential neighborhood!**

AA-5  
(cont.)

#### Project Vicinity

The surroundings of the project site are largely dominated by residential neighborhoods and elementary schools with a small amount of retail/restaurant businesses.

AA-5  
(cont.)

The proposed projects size, six stories, 220 rooms, 254,000 sq ft and time for construction, 5 years is something that might be acceptable in a commercial/industrial area, but is totally unacceptable in a residential area. The size of the buildings/parking structure will overwhelm the existing neighborhoods and is totally out of character for a predominately residential area with a number of schools in the same area .

As can be seen in the preceding BCHD pictures this structure simply overwhelms the predominately residential neighborhoods that surround it anyway you look at it.

***Conclusion: The Proposed Monument Is Out of Place in a Residential Neighborhood.***

Alan Archer

*“EIR shall describe a range of reasonable alternatives to the proposed project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives”*

## 5.0 ALTERNATIVES

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

AA-7 Local Bond Measure and Seismic Retrofit, (DEIR 5.16).

Escalating maintenance costs in maintaining existing infrastructure. If BCHD wishes to continue as a business entity and needs additional funds to support these ongoing functions then they should propose a financing bond with the voters of Redondo, Hermosa and Manhattan Beach cities. “However, the success of a local bond measure is speculative, particularly given the history of recent bond measure initiatives in the South Bay”. It may be speculative, but given that the voters are already on the financial hook for a portion of the operating costs for BCHD, put it on a ballot and let the people decide whether BCHD is even viable anymore. It would be less expensive to do the Seismic Retrofit with LESS DISRUPTION to the surrounding RESIDENTIAL NEIGHBORHOODS.

- Alternative 2 – Sale and Redevelopment of the BCHD Campus.

AA-8 This is nothing more than a distraction/scare tactic. Speculative as to what may replace the existing campus if it gets sold. We can deal with that situation if it were to happen when it happens.

- Alternative 3 – Revised Access and Circulation.

AA-9 If this ever gets built at least we won’t have to put up with traffic issues on Flagler. Small consolation prize, but we still don’t want this Proposed Monument built as It Is Out of Place in a Residential Neighborhood.

- Alternative 4 – Phase 1 Preliminary Site Development Plan Only.

AA-10 This still builds the Proposed Monument That Is Out of Place in a Residential Neighborhood and dangles the loss of Phase 2 construction of the Wellness Pavilion, Aquatics Center, and CHF that are lacking in details to begin with.

- Alternative 5 – Relocate CHF Permanently and Reduced Parking Structure

AA-11 So CHF gets relocated permanently and 2 stories get removed from the Phase 2 parking structure, so what. This would have negligible impact on the construction periods. This still builds the Proposed Monument That Is Out of Place in a Residential Neighborhood.

- Alternative 6 – Reduced Height Alternative

AA-12 | Okay, less height, bigger footprint, unknown different shadowing affecting Torrance residences to the East of the project. Closer construction noise, pollution, etc, to Torrance residences to the East. This is STILL a huge proposed construction project and is inconsistent with the area. The Proposed Monument Is Out of Place in a Residential Neighborhood.

AA-13 | This is supposedly being driven because of a seismic retrofit of the Beach Cities Health Center and the Beach Cities Advanced Imaging Building which would certainly be less costly than the proposed project. If there is such an Urgent Need for this Seismic Retrofit why is the stated time period, (2 to 3 years), before vacating the buildings so far out in the future? Who/what is driving this mandate? Is it building codes or the county?

AA-14 | The Proposed Monument Is Out of Place in a Residential Neighborhood.

Alan Archer



## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 11:48 AM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Comments to be Read into the Record

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**From:** Alan Israel <alansearch@verizon.net>  
**Sent:** Wednesday, March 24, 2021 12:23 PM  
**To:** Communications <Communications@bchd.org>  
**Subject:** Public Comments to be Read into the Record

I am opposed to the BCHD- for several reason:

- AI1-1 | SIZE- The project is too big and it will dwarf all other buildings in the neighborhood.
- AI1-2 | CONSTRUCTION - The construction will take too long, create havoc with traffic and generate pollution to the detriment of residents in the area.
- AI1-3 | COMPATIBILITY - The BCHD campus site is in the middle of a residential area. This project will block views and sunlight and change the entire personality of the area.
- AI1-4 | COST - The project will cost an outrageous amount of money with no guarantee of any return on the investment.
- AI1-5 | NEED - A variety of assisted living facilities already exist in the area, and the current trend is toward providing assistance to the elderly in their own homes.
- AI1-6 | COMMUNITY SERVICE - The anticipated cost of residence in the proposed facility will make it unaffordable for many if not most South Bay residents.
- AI1-7 | PURPOSE - This plan is designed not to serve the people of the community, but rather to generate revenue. BCHD is basically a real estate business masquerading as a semi-public agency. Why should BCHD be allowed to invest my tax dollars in a money-making real estate endeavor?

Alan Israel



## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:42 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD Campus

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**From:** Alan Israel <alansearch@verizon.net>  
**Sent:** Wednesday, June 9, 2021 12:51 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** BCHD Campus

This project should be abandoned because:

- AI2-1 | --It is not needed
- AI2-1 | --It is too expensive
- AI2-1 | --It is too large
- AI2-2 | --It is an illegal use of public land and taxpayer funds in a for-profit real estate venture
- AI2-3 | --It provides little benefit to beach cities residents
- AI2-4 | --It will destroy the residential nature of the surrounding neighborhoods

This project is intended only as a self-perpetuating mechanism for BCHD which long ago outlived its usefulness.

Alan Israel

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:13 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Comments to BCHD DEIR

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**From:** Allen Rubin <lasvegasal@gmail.com>  
**Sent:** Tuesday, May 25, 2021 7:53 AM  
**To:** EIR <eir@bchd.org>  
**Cc:** mara.gil@tUSD.org <mara.gil@tUSD.org>; PFurey@torranceca.gov <PFurey@torranceca.gov>; GChen@torranceca.gov <GChen@torranceca.gov>; TGoodrich@torranceca.gov <TGoodrich@torranceca.gov>; MGriffiths@torranceca.gov <MGriffiths@torranceca.gov>; AMattucci@torranceca.gov <AMattucci@torranceca.gov>; HAshcraft@torranceca.gov <HAshcraft@torranceca.gov>; SKalani@torranceca.gov <SKalani@torranceca.gov>; Bill.brand@redondo.org <Bill.brand@redondo.org>; todd.loewenstein@redondo.org <todd.loewenstein@redondo.org>; nils.nehrenheim@redondo.org <nils.nehrenheim@redondo.org>; christian.horvath@redondo.org <christian.horvath@redondo.org>; laura.emdee@redondo.org <laura.emdee@redondo.org>; zein.obaji@redondo.org <zein.obaji@redondo.org>; joe.hoefgen@redondo.org <joe.hoefgen@redondo.org>; PlanningRedondo@redondo.org <PlanningRedondo@redondo.org>; AChaparyan@torranceca.gov <AChaparyan@torranceca.gov>; Vhoang@torranceca.gov <Vhoang@torranceca.gov>  
**Subject:** Public Comments to BCHD DEIR

Hi there,

I am an original resident of the Sunny Glen area. My parents were the first owners of 19615 Redbeam Ave. Torrance 90503 My mom still lives there. Phase1, September, 1969. Flagler is 2 blocks away and has been our exit of the neighborhood to Vons and locations in that direction. Now they closed the Flagler SB entry back into the neighborhood causing us the issue of having to go all the way around that medical facility to Del Amo Blvd in order to get home from Vons. That is not cool. In the past few years Redbeam has become a cut thru for people to get to Redondo. The traffic has increased, as well as the stop sign driver thru without stopping and speeders. It's very annoying as I stand there in front of the house and watch them blatantly drive thru it in front of me. I foresee even bigger problems with this project and this will certainly reduce the values of the homes.

Thank you  
Allen Rubin  
[SouthBayWeb@gmail.com](mailto:SouthBayWeb@gmail.com)  
[www.SouthBayWebsiteDesign.com](http://www.SouthBayWebsiteDesign.com)  
[www.ThePhoneAppCompany.com](http://www.ThePhoneAppCompany.com)  
310-200-3515

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:44 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Comments to the BCHD DEIR

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**From:** Amy Matsuda <hasupanda@yahoo.com>  
**Sent:** Wednesday, June 9, 2021 4:25 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Public Comments to the BCHD DEIR

I am a parent of a 4th grader at Towers Elementary School and a 6th grader at Bert Lynn Middle School.

I am opposed to the massive BCHD development.

This development will bring polluted air to the children and neighborhoods all around the area. There is no way the contaminated air can be contained. Our children will not be safe at school, nor in their own homes! Even daily living, walking our dogs, playing in the yard, or riding bikes will have major consequences to our health. Trucks will be moving in and out all day long, spreading dust and contaminates everywhere!

How will our children learn with all the noise deafening out the teacher's voices? How can residents enjoy their life when there is loud, constant construction noise all day long? Would you like to live with all of that? Think about others and not just about yourselves. You are doing this for money, not for the well-being of us residents.

Stop the BCHD development!!

Amy Yick

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:38 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: requested 90 day comment on BCHD Campus

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**From:** Anita & Bob Caplan <arcaplan2@gmail.com>  
**Sent:** Tuesday, June 8, 2021 8:47 AM  
**To:** EIR <eir@bchd.org>  
**Subject:** requested 90 day comment on BCHD Campus

ABC1-1

|We find the Draft EIR technically sufficient with regard to impact analysis and mitigation analysis.

Anita and Bob Caplan  
Users of the BCHD services  
402 S Lucia Ave, Redondo Beach, CA 90277

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:38 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Plan good fit with our needs

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**From:** Anita & Bob Caplan <arcaplan2@gmail.com>  
**Sent:** Tuesday, June 8, 2021 8:52 AM  
**To:** EIR <eir@bchd.org>  
**Subject:** Plan good fit with our needs

ABC2-1

General comment regarding the proposed Health Living Campus -- It would be an excellent fit to our needs for health promotion and maintenance.

Anita and Bob Caplan  
Users of BCHD services  
402 S Lucia Ave, Redondo Beach, CA 90277

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:39 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Comment to Beach Cities HD

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**From:** Martin D. Gallagher <mdgapg@verizon.net>  
**Sent:** Tuesday, June 8, 2021 2:24 PM  
**To:** EIR <eir@bchd.org>; GChen@TorranceCA.Gov <GChen@TorranceCA.Gov>; Mayor Patrick Furey <PFUREY@TorranceCA.gov>  
**Cc:** TRAO90503@gmail.com <TRAO90503@gmail.com>  
**Subject:** Public Comment to Beach Cities HD

We wish to voice our strong opposition to the development which Beach Cities Health District has proposed for the hill immediately to the west of our neighborhood.

AMG-1 We have lived in our home on Linda Drive for nearly 52 years, and wish to maintain the character of our neighborhood; we do not wish to see the construction of a monstrosity on the eastern edge of the hilltop which will rob us of sunlight shortly after mid-day, or live with the years of noisy disturbance and environmental hazards that the lengthy construction will bring about. Its sheer gargantuan size and positioning, and the issues resulting from it, including environmental problems, traffic problems, health dangers, years of noise, and actual loss of open space, as well as illegal zoning and the assumption that the neighboring city of Torrance will “go along” with utilizing its Flagler Lane for service vehicles’ ingress and egress—all of these point to the hubris with which the leaders of this plan have gone forth. It is “empire-building” at its worst.

AMG-2 The proposed residence is not geared to benefit local residents of BCHD cities with housing, but clearly to appeal to wealthy people presently living elsewhere, and from whom it is expected to receive the revenue.

AMG-3 Put us down as **OPPOSED** in most vehement terms.

Ann & Marty Gallagher  
19404 Linda Drive  
Torrance, CA 900503  
June 8, 2021

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:08 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD DEIR Public Comments

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**From:** Ann Cheung <acheungbiz@gmail.com>  
**Sent:** Tuesday, April 13, 2021 4:37 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** BCHD DEIR Public Comments

I am a resident of the Pacific South Bay community and I object to the HLC master plan as proposed.

AC1-1

As I read through the draft EIR, it is apparent that many writers' time, money went into drafting the document. The draft EIR dismissed most of the public concerns/issues raised as either less than significant or less than significant with mitigation. BCHD wants to come across as having done due diligence in addressing public concerns when in fact the HLC project grew substantially in size and height from the 2019 plan.

AC1-2

No matter how the draft EIR is polished and presented, two confronting and serious impacts remain unsolvable. The first one is noise, the second is traffic.

- Noise - It is unconscionable to expect residents around the project site to live with construction related noise six days a week for years and then post construction, outdoor activities to last late into the evenings (10 p.m.)
- Traffic - Anyone who lives near the HLC project site knows the surrounding streets (Del Amo, Prospect, Beryl) are already saturated with traffic; access to Flagler Lane by BCHD is out of question. It must have been a very difficult impact to address. As part of the mitigation measures, BCHD is proposing to implement a comprehensive Transportation Demand Management Plan, which would provide trip reduction strategies for BCHD employees, tenants, and campus visitors. The strategies include among others, championing alternative mode transportation to BCHD employees and providing incentives for biking to work. Desperate measures needed?

AC1-3

AC1-4

The voluminous draft EIR is an indication that the scope of the HLC project is overly aggressive and inadequate in many aspects. If the HLC project is to proceed as proposed, the decision makers would have truly done a disservice to the nearby Redondo Beach and Torrance residents.

*Ann Cheung*

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:35 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Record Comments to BCHD Owning Cities Redondo Beach, Hermosa Beach and Manhattan Beach

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**From:** Ann Cheung <acheungbiz@gmail.com>  
**Sent:** Sunday, June 6, 2021 4:56 PM  
**To:** cityclerk@redondo.org <cityclerk@redondo.org>; cityclerk@torranceca.gov <cityclerk@torranceca.gov>; cityclerk@citymb.info <cityclerk@citymb.info>; torranceptas@gmail.com <torranceptas@gmail.com>; Communications <Communications@bchd.org>; EIR <eir@bchd.org>; cityclerk@hermosabeach.gov <cityclerk@hermosabeach.gov>  
**Subject:** Public Record Comments to BCHD Owning Cities Redondo Beach, Hermosa Beach and Manhattan Beach

Honorable elected officials:

I am writing to you to express my opposition to the Beach Cities Health District's **Healthy Living Campus** Project. If you are inclined to endorse the project, please consider the following before you decide:

- Is there a need for: a) Residential Care for Elderly (RCFE) Building with 157 new Assisted Living units, 60 Memory Care units (replacing the existing Silverado Beach Cities Memory Care Community located within Beach Cities Health Center), b) 14,000 sf of space for the Program of All-Inclusive Care for the Elderly (PACE), **in the cities of Redondo Beach, Manhattan Beach and Hermosa Beach?** If your answer is no, your decision should be obvious.
- Do you know what you are being asked to approve/support? While Phase 1 of the DEIR presents many unsolvable logistic issues, Phase 2 is even more murky. It is merely "a more general development program based on the design guidelines of the proposed Healthy Living Campus Master Plan and the best available planning information at this time." Would you go forward and invest your personal funds on such an incomplete program plan? If you answer "no" to the question, then you should not support the project.
- Are you familiar with the area, specifically nearby schools and traffic conditions, in which the Health Living Campus is to be built? Traffic will be unbearable for nearby residents. BCHD provides no comprehensive, detailed analysis of the RCFE and PACE daily commuters including participants, employees, contractors, medical professionals and visitors in the DEIR. In addition, the description of how thousands of heavy haul truck trips during the construction period could be managed is a stretch; Del Amo Blvd., Prospect Avenue and Beryl street will come to a screeching halt. If you read the traffic mitigation plan in the DEIR, you will learn that even BCHD cannot dodge the traffic problem..
- Lastly, could you live by a construction site and be subjected to construction noise and dust/pollution for 6 days a week for years? This is what the residents in Redondo Beach and Torrance will be subjected to if the BCHD's project is to proceed. A hazardous environment even for the healthy let alone our senior residents with health conditions.



I implore all of the elected officials to act justly in deciding the fate of the Healthy Living Project. Thank you for your consideration.

Respectfully,  
*Ann Cheung*

June 9, 2021

Ann Wolfson  
Public Comments to the BCHD DEIR

To: Nick Meisinger,

AW-1 | As a lifelong resident of both Redondo Beach and Torrance, I oppose the HLC project for the environmental impacts and harm it will cause surrounding residents, both during construction and the permanent damage it will have on our community. I have many concerns about deficiencies in the DEIR after reviewing the document.

AW-2 | The DEIR is deficient. 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. Phase 2 descriptions are vague, lack proper visualizations and result in an unstable project. Though many health studies exist, the DEIR lacks substantive analysis of impacts to the health and well-being of residents due to these impacts, which is also incongruous with the stated mission of the public health district.

AW-3 | The DEIR provides restrictive assumptions in its Project Objectives. Bottom line: the public health agency's objectives are not public-focused or based on community needs. The community is not clamoring for BCHD to build a high-priced for-profit RCFE or to cede public land zoned PCF to a private developer who will develop, own and operate it. Project Alternatives are flawed and omit the most environmentally friendly and sound solution: retrofit the existing building.

AW-5 | The cumulative impact of these deficiencies should be addressed and the DEIR reissued to ensure agencies and the public have the appropriate data to make their determinations and responses.

These are supplemental comments and the following are a few of the deficiencies that I would like to see addressed.

Thank you for your time and attention,  
Ann Wolfson

## Aesthetics and Visual Resources

**Incompatible with Surrounding Neighborhoods.** The project and RCFE is clearly incompatible with surrounding neighborhoods. When the hospital was constructed over 60 years ago, the surrounding area was farmland. Today the site is surrounded on all sides by single family homes, schools, small apartments and parks.

AW-6



Incompatible. Key Viewing Location from Harkness and Beryl

**RCFE placement.** The RCFE's placement on the extreme perimeter of the property, combined with its proposed scale and mass, causes significant damage to surrounding neighborhoods. This positioning of structures and its scale should not be proposed or allowed if environmental and health hazards to residents are presumed to be important. An 11-acre plot of public land does not require an obtrusive design that is neither good for the environment nor wellness of those residents living by the site.

Phase 1, the RCFE's scale, mass and position violates both the **language and spirit** of the General Plan policies for the cities of Torrance and Redondo Beach to be "compatible in scale, mass, and character with surrounding neighborhoods", as follows:

AW-7

- Redondo Beach General Plan Policy 1.46.4. "... 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."
- Torrance General Plan Policy LU.2.1. "Require that new development be visually and functionally compatible with existing residential neighborhoods..."
- Torrance General Plan Policy LU.3.1. "Require new development to be consistent in scale, mass and character with structures in the surrounding area"

Single family homes and small apartments units surround the site. Some as close as 80 ft. from proposed structures. Property lines and backyards of homes on Flagler Alley in

Torrance are literally **20 ft.** from the bottom of the hillside slope. Height limits are up to 30 ft. or less to the West, East, and South. To the North, Residential RMD and Light Commercial C-2, both have 30-foot height limits.

The massive RCFE, built out to the edge of the property, ignores this and will:

AW-7  
Cont.

- Cause significant damage to blue sky views.
- Cause major privacy issues for all surrounding residents.
- Create significant glare and night-time lighting of the 24/7 operations facility.
- Create shadow effects that are significant to Torrance homes to East, Towers Elementary school and Redondo Beach homes to the North.
- Obstruct sightlines far beyond surrounding neighborhoods.

Though many studies exist, the DEIR lacks substantive analysis of these impacts, as required by CEQA, to the health and well-being of residents and the public.

**Key viewing locations flawed.** KVLs provided are insufficient, deceptive and shown from innocuous sites. The main KVL from 190th and Flagler used to justify mitigation of reduction of 20 ft. height falls to address the important visual impact it is designed to address:

AW-8

- Viewing location is one of the few viewing locations where the project site appears to be lower than street level, rather than elevated 30 ft. above street level.
- View of PV Ridgeline from this viewing location is not representative of views and is transitory and fleeting.

The EIR states it considered the impact the 103 ft. height of the building would have on the view of the very top of the Palos Verdes “ridgeline” from the point of view of drivers speeding along 190th and Flagler (see Figure 2).

From the DEIR,

“As such, vehicles traveling the speed limit of 35 miles per hour (mph) experience this view for approximately 30 seconds. Depending on traffic at the signalized intersection, the view could be available for slightly longer, but generally less than 1 minute.”

AW-8  
Cont.



Before - View from 190<sup>th</sup> and Flagler



After – Imagine ground-level views blocked from all directions

The public view used to mitigate the height of the RCFE to “less than significant” could have been from any location, such as in Figure 1, where the viewing time of the public is much more stable and long-lasting.

AW-9 **Responsible Agency - City of Torrance not consulted** on key viewing locations, as stated in the City of Torrance’s response to the DEIR. New KVLs from the city of Torrance must be provided with city input. Approximately half of the KVLs are taken from the vantage point of Torrance.

The DEIR states:

“To evaluate potential changes to visual resources, representative views were identified with input from the City of Redondo Beach.”

**Phase 2 realistic photo-simulations are completely missing.**

The DEIR states:

AW-10 “VIS-2 The proposed Project – including the Phase 1 preliminary development plan as well as the Phase 2 development program – would alter the visual character of the Project site and surrounding areas in Redondo Beach and Torrance.”

Without Phase 2 photo-simulations and other visual aids, the visual impacts of the whole project is never shown and cannot be analyzed.

AW-10  
Cont. DEIR states: “maximum building footprints and maximum building heights” of Phase 2 are addressed in the DEIR, but they are never shown. Phase 2 appears to be the phantom phase – it casts a long and damaging shadow, but it is never seen. Its environmental impacts are nothing more than educated guesses. CEQA requires much more.

***Conclusion/Action Requested:***

AW-11 Aesthetic impact of the project on both surrounding neighborhoods and far beyond is significant. On surrounding neighborhoods, the impact is devastating. It is completely incompatible with any reading of both cities’ General Plan and municipal code, even with their proposed mitigation. Importantly, Torrance homes to the East are subject to Torrance code Article 41 - R-H Hillside and Local Coastal Overlay Zone, Section 91.41.1. Hillside and Coastal Zone.

AW-12 The South Bay itself is known for its panoramic and unadulterated views of the Palos Verdes peninsula to the South and views of the mountains to the North. The site itself is elevated, placement of RCFE on extreme perimeter of the site tremendously increases its visual impact and blocks blue sky views.

AW-13 The DEIR is deficient and missing information and visual aids for both phases necessary for agencies and the public to make reasonable assessments. The key visual impacts of Phase 2 on the public views of the blue sky and mountains from the intersection of Diamond and Prospect were never studied and can’t be determined without visual aids.

AW-14 Provide photo-visualizations and other physical visual aids such as silhouettes, poles, flag banners showing proposed height and mass of structures for Phase 1 and Phase 2. Provide new key viewing locations consulting with the City of Torrance as requested. At a minimum, views should include those from: 1) the intersection of Diamond and Prospect looking north, 2) Prospect and 190<sup>th</sup> street looking south & south/east 2) Towers Elementary School looking west and 3) Diamond St. looking north.

AW-15 Substantial setbacks to the center of the site, combined with major reduction in height would help mitigate aesthetic damage to neighborhoods and help compatibility with the neighborhoods.

AW-16 Detailed health impacts are not presented in regard to loss of sunlight, lack of privacy, glare and nighttime lighting, and the effect of shadowing and lack of sunlight on surrounding Redondo Beach and Torrance residents, and Towers Elementary school.

AW-17 Shade study must show hourly ranges. DEIR does not address on-site after school activities such as YMCA daycare, and athletic uses for AYSO soccer practices that will be negatively impacted by lack of sunlight.



AW-18 Aesthetics and visual resources should be changed to “significant” impact, not “less than significant with mitigation”. These impacts directly affect health and well-being.

AW-19 The DEIR should be rejected and recirculate an updated DEIR with details showing the full and complete impacts of the Project on the environment.



Winter solstice shadows cover West Torrance homes and Towers Elementary School

## Hazards and Hazardous Materials

BCHD plans to:

- Demolish the 514 building (old South Bay hospital) which contains lead, mold, asbestos, and other contaminants.
- Excavate, grade and trench more than 31,000 cubic yards of soil, containing known hazardous contamination including PCE at up to 150 times the residential threshold, chloroform, and benzene (per the Converse Consultant Phase II Site Assessment Report dated Feb. 2020).

**Airborne contaminants from hazardous chemicals, waste, demolition debris, and concrete dust.** With heavy excavation of the site, handling of hazardous waste and proper mitigation is critical.

What was discovered in Converse Consultants’ Phase II Environmental Report?

- PCE (perchloroethylene) found onsite in 29 of 30 soil samples at levels up to 150 times the allowable residential screening level
- Chloroform and Benzene found onsite

According to the DEIR:

AW-20  
Cont.

"Soil disturbance during excavation, trenching, and grading at the Project site would result in the disturbance of potentially contaminated soil. Ground disturbing activities (e.g., excavation, trenching, and grading) during Phase 1 and Phase 2 would disturb **PCE-contaminated soils**, beginning with the excavation of the subterranean levels of the RCFE Building to a depth of 26 feet during Phase 1. Similarly, grading within the vacant Flagler Lot would also encounter PCE-contaminated soils. The soil samples on the vacant Flagler Lot ...had the greatest concentrations of PCE on the Project site (Converse Consultants 2020; see Appendix G). "

AW-21

**The selection of boring sites is inadequate.** The only 30-foot boring, at B-1, which was known to be far away from where the main contaminants were found. This is counter-intuitive to a company whose job it is to find contaminants. Converse Consultants advised in their report: "Deeper borings in the locations where pollutants were found would yield even greater findings of more pollutants."

AW-22

**Hazards of demolition of a 60+ year old hospital.** Even with the best mitigation plans there is the risk of accidental release of asbestos, lead, nuclear waste, PCBs, mold, etc.

***Conclusion/Action Requested:***

AW-23

Additional deeper borings and analysis should be done on the construction site. The fact that the PCE was found in 29 of 30 samples throughout the site shows it is widespread, often found far from its potential original source, and is likely spreading deeper and downhill the slope from its origins.

AW-24

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.

AW-25

Study and report on the ramifications of human error or noncompliance with the appropriate guidelines. With so many critical mitigation plans to be put in place, what happens when something unforeseen occurs? What are the penalties for noncompliance? Specify who is held accountable - the BCHD, the City of Redondo Beach, the developer?

AW-26

More information is needed on watering down of construction debris, contaminated soils, etc. and its impact on streets like Beryl, Flagler and Flagler Alley, which are downstream and in close proximity to homes and Towers Elementary. What happens in case of a landslide?

AW-27

Provide analysis for the stormwater drain system as it pertains to its impact on water conservation/nature preserves to the lower elevations in the East, such as Entradero Park in Torrance.

## **Air Quality**



DEIR states Air Quality impact is “less than Significant with mitigation”.

“However, on-site construction-related emissions would exceed the SCAQMD localized significance thresholds (LSTs) for respirable particulate matter (PM10) and fine particulate matter (PM2.5) as they affect off-site receptors. “

The project would create air quality hazards, diesel particulates and fugitive dust known to be health hazards, even with mitigation measures. Throughout the DEIR, mitigation plans are not sufficiently discussed nor safeguards detailed adequately. MM AQ-1 “would require watering of exposed surfaces three times daily....and prohibiting demolition when wind speed is greater than 25 miles per hour (mph).”

The mitigation plan only accounts for prohibiting demolition during wind events greater than 25 mph. It does not account for potential ineffectiveness of mitigations from the loading up of demolition debris, excavation of 30,000 cubic yards of soil with known toxic substances such as PCE, and concrete grinding onsite, etc. with intermittent wind speeds at 25 mph and higher. For instance, in March 2021, wind speeds were measured at 45 mph on the lower site adjacent to the construction site. This wind speed was enough to topple the Shell Station tower.

AW-28



Sufficient detail is not provided in the plans for airborne contaminants and fugitive dust for the localized site that includes surrounding homes and Towers Elementary school. Likewise, provide more detail on torrential rainstorms and their effect on the construction site, hillside slope and hazardous materials in the sewer system and storm drains in Torrance. The construction site sits on a 30 ft. bluff. More study on the effects of wind on construction debris, soils, etc. should be done.

***Conclusion/Action Requested:***

Provide additional detail on the mitigation plan of stopping construction during active demolition, with wind speeds above 25 mph to include piles of soil, demolition debris,

finishing sanding, painting, etc. for all construction and finishing phases of the project, at varying wind levels above the 25-mph limit.

AW-28  
Cont.

Provide the topological effect of the site and wind factor. Provide more analysis of fugitive dust and airborne contaminants of pulverizing concrete onsite, for surrounding homes and schools, and for homes to the East, including Towers Elementary schoolyard. Provide more detail on effects of natural events such as high winds on airborne contaminants.

[Ref: nFugitive Dust from Construction  
<https://www3.epa.gov/ttn/chief/ap42/ch13/final/c13s02.pdf> ]

Analyze and detail potential harms to Silverado tenants, employees and visitor, employees and the public in medical offices onsite, and local businesses (Vons Village Shopping Center) directly below the site.

## Noise

**Unmitigated Noise.** According to the DEIR, NOISE "Is a Significant impact that cannot be mitigated." Even with standard construction-related mitigations applied, noise levels during the 5+ years of construction will EXCEED the Federal Transit Authority (FTA) thresholds.

According to the DEIR, residents and the public will be exposed to hazardous noise levels of 80 to 90+ dBA. The DEIR shows the Noise levels will exceed both daily and 30-day average standards permitted by law.

Construction schedule is 6 days a week: Monday to Saturday.

The DEIR section on noise states in part:

AW-29

"Prolonged exposure to high levels of noise is known to have several adverse effects on people, including hearing loss, communication interference, sleep interference, physiological responses, and annoyance (Federal Interagency Committee on Urban Noise [FICUN] 1980)." [Ref: DEIR Sec. 3.1 Noise]

The impacts will be greatest throughout the areas surrounding the 11-acre site.

"...significant and unavoidable noise impacts would occur through implementation of proposed construction." [Ref: DEIR p.3.11-35]

The hazards of noise to all residents/sensitive receptors including the public at large include:

- Surrounding residents to the South, North, West and East of the site,
- Tenants of Silverado who are on-site throughout the entire construction period
- Towers Elementary School with 600+ 4-10 year old students, staff, and visitors
- Adjacent businesses, workers and the public

- Medical offices onsite employing health care workers, doctors and others, serving the public.

AW-29 Cont. The reason provided that the noise can't be mitigated is that the project height, size, and placement on the hill prevents suitable noise barriers from being erected and effective – they can only reasonably go up to an approx. 3-story height.

In addition to construction noise, operational noise levels for anticipated events on-site such as music, etc. is not sufficiently discussed or analyzed.

**Conclusion/Action Requested:**

The study of noise is deficient, the data was based on modeling averages and not intermittent noise. The negative health impacts of 70-90+ dBA must be provided.

Provide details on the following: What will be the health impact to tenants of Silverado and workers who will live onsite through demolition and construction in both phases? What is the impact to medical workers, their staff, and the general public in 510, 514, and 520 buildings through construction?

What are the effects of intermittent noise disruptions as well as ground vibrations caused by truck traffic and construction on students in classrooms and out on the playground? Towers Elementary has 600+ students age 4-10 and is recognized as a top school in the area. How will it affect student performance as well as health?

AW-30 The DEIR does not include sufficient health impacts. According to a 2018 ruling by the California Supreme Court:

“In an important CEQA case, the California Supreme Court ruled that courts reviewing claims that an Environmental Impact Report (EIR) inadequately discusses environmental impacts must determine whether the EIR “includes sufficient detail” to support informed decision making and public participation. The court also held an EIR must make “a reasonable effort to substantively connect a project’s air quality impacts to likely health consequences.” The decision, *Sierra Club v. County of Fresno*, Cal. Supreme Court Case No. S219783 (Dec. 24, 2018), makes clear that EIRs must contain clear and detailed discussion of impact significance determinations, and in particular must explain the nature and magnitude of significant impacts.”

[Ref: <https://www.meyersnave.com/ca-supreme-court-establishes-ceqa-rules-eirs-discussion-health-effects/>; <https://www.latimes.com/local/lanow/la-me-school-lawsuit-20171218-story.html>]

AW-31 **Viable mitigations to noise were not considered** in the DEIR, such as for structure to be significantly set back to the center of site and reduce the height structure to no more than 30 ft., the maximum height of potentially viable noise barriers. Alternative 6,

AW-31 | constructing two buildings next to the edge of the site is **not** a replacement for  
Cont. | substantial setbacks to the center of the site.

AW-32 | **Any non-mitigatable impact** affecting surrounding residents, students, employees, medical workers, and the public at large for the 5 years of construction **is cause for the BCHD Board and approving City agency to reject the Project as proposed.**

## Missing category: Recreation

CEQA category on Recreation is completely omitted in DEIR.

### **Conclusion/Action Requested:**

AW-33 | Recreation at Towers Elementary is missing. Discuss impacts of construction air quality, transportation, and shadow effects on Towers Elementary schoolyard during school hours and key after hours programs such as YMCA daycare.

Recreation for Dominguez Park, adjacent to the construction site and disruption to Dominguez Dog Park is not addressed. Heavy construction activities, heavy construction and demolition equipment and flagmen will greatly hamper access due to heavy construction equipment route, access and staging near Flagler lot and Beryl, as well as increased use of local facilities and services after construction and during operation must be analyzed and addressed. This is another reason to recirculate the DEIR.

## Biological Resources

The DEIR states:

“BIO-1 The proposed redevelopment of the Beach Cities Health District (BCHD) campus... proposed Project would not substantially interfere with resident or migratory birds. Impacts would be less than significant with mitigation.”

AW-34 | “The Tree Inventory Report prepared by Carlberg Associates (2019) concluded that **219 of the 228 of the landscaped trees located on the Project site are in good condition...** However, redevelopment of the Project site would require the **direct removal of approximately half of the existing landscaped trees** as well as a number of shrubs and other non-native ground cover. Additionally, adjacent vegetation, not proposed for removal, could be indirectly impacted by intrusion into their root zone.”

**How is it possible that removing half of the 228 mature healthy trees for Phase 1 is considered “less than significant”?**

**Removing more than 100+ mature (60-year old) healthy trees.** The RCFE structure pushed to the edge of the property line devastates most of the mature trees on the site,

just for Phase 1. The proposed position of the massive facility planned to be built out to the perimeter of the property causes removal, including:

- 20 trees along Flagler Lane, north of Towers Street. (\*must have permit approval from Public Works, City of Torrance)
- 60 trees along the northern perimeter of the campus to clear for the city block long RCFE
- 20 trees along Diamond Street for the SCE Substation Yard.



60-year old trees along Flagler Lane and Northern perimeter of the site slated for removal

**Over 100 large 30-50 ft. trees can easily be saved from destruction** by repositioning the RCFE structure with an appropriate setback from the edge of the property. They include 60 mature trees that line and provide privacy along the entire Northern perimeter of the site, 20 mature trees in the City of Torrance along Flagler, and 20 mature trees providing privacy screens from the site along Diamond.

Torrance is a designated “Tree City” and the City of Redondo must not allow this to happen.

In addition, all of the visualizations and marketing renderings provided deceptively show fully mature trees. In reality, it would take many decades to reach the height and mass of the trees shown.

**The Hamilton Biological study is deficient** both in time and manpower. Hamilton, a one-person team, conducted a 4.5-hour tour of the entire 11-acre campus with 276 trees and countless shrubs around the site while documenting wildlife. From the report:

“Biologist Robert A. Hamilton conduct a field survey on May 9, 2019, from 10:45 a.m. to 3:15 p.m. ... Mr. Hamilton covered all parts of the campus, searching for all plant and wildlife species present, and searching for any sign of active nesting by birds. The purpose was to evaluate whether any biological resources present in the area might be subject to local, state, or federal resource-protection.”



AW-35  
Cont.



AW-36

**One hummingbird's nest on all 11 acres.** In 4.5 hours, he walked the entire 11-acre campus, documented 26 different species of birds and only found one (1) Allen's hummingbird's nest in all the property? This hardly seems credible. Any resident who routinely walks the area surrounding the 11-acre site on Flagler St. and Alley sees countless hummingbirds, crows, hawks, and observes territorial behavior and nests. Living close to the project, there is currently a hummingbird's nest on my patio. A more comprehensive survey must be conducted.  
[Ref: <https://www.bchdfiles.com/docs/hlc/Appendix%20C-Biological%20Resources.pdf>]

AW-37

Cooper's Hawk, on the CDFW Watch List are commonly sighted in the area. From the DEIR:

**"Cooper's Hawk.** Cooper's hawk, which is listed on the CDFW Watch List, is a common and widespread raptor species found frequently in urban and suburban areas across Southern California... Cooper's hawk has a high potential to be present on the Project site during winter or migration periods. The large mature trees located along the perimeter of the Project site would provide potential roosting areas during seasonal migration.... Cooper's hawk, listed on the CDFW Watch List, is the only special status species with a **high-potential to occur on the Project site.**"

AW-38

**Conclusion/Action Requested.** The original biological study on nesting was deficient. Re-conduct a larger scale study that thoroughly checks all the vegetation and trees with the single purpose of finding nests. As noted Cooper's Hawks are also commonly found in the area and have a high potential for nesting on the site in the large mature trees slated to be destroyed.

AW-39

Creating appropriated setbacks of structures and construction away from the edge of the property to the center of the property would also save over 100 fully mature 60-year-old trees from removal and destruction.

AW-40

Any new trees planted would take many decades to reach current level of privacy and maturity. Artistic sketches provided are deceiving at best. Provide realistic sketches of how the landscaping would look as planted, not 20 to 30 years in the future.

## Phase 2 Program Description

Phase 2 project description is vague and inconsistent, omits both critical and most basic elements such as visualizations and drawings.

AW-41 **Conclusion/Action Requested.** It is impossible to understand the whole project based on the lack of any detail, and any real visualizations of Phase 2. This makes for a DEIR that is unstable and deficient. Descriptions are inconsistent. A programmatic approach for Phase 2 was decided by the BCHD and Environmental consultant in late January 2020, shortly before the DEIR was published. Based on incomplete information, the DEIR should be redistributed so that agencies and the public have the appropriate time to review and respond.

## Alternatives

The California Environmental Quality Act (CEQA) Guidelines state that an:

“EIR shall describe a range of reasonable alternatives to the proposed project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives” (CEQA)”.

**Alternatives Not Chosen.** Several viable alternatives were not chosen or further explored that would be the most environmentally friendly alternatives.

AW-42 **Retrofit 514.** Just a few years ago, retrofitting 514 was the solution for BCHD and as well as buffering the community by putting construction in the interior of the site. It was abandoned after getting just one quote for \$86.5M that included retrofit and remodeling, which was within their reach. Then in 2018, a new concept was born with an architect’s pen of putting a massive RCFE on the perimeter of the campus and plans ballooned from there. However, retrofitting the building is still the most environmentally friendly and viable option. To leave this out of alternatives is deficient. DEIR should provide an alternative that addresses retrofit of the building, which would still meet project objectives.

**Alternate Sites for RCFE.** The DEIR states, “Alternate sites for the relocation of existing BCHD uses and the development of proposed services and facilities were considered. Such sites would need to be located within Redondo Beach, Hermosa Beach, or Manhattan Beach and have similar attributes to the Project site. For example, an alternative site would need to be large enough (i.e., 9.78 acres or greater) to accommodate the development footprint and uses associated with the proposed Healthy Living Campus. “

AW-42  
Cont.

There is no requirement that the RCFE of Phase 1 and other structures in Phase 2 be co-located on the same lot of land to meet project objectives. Being a “Center of Excellence” does not imply or require physical co-location of services; an alternative site would not need to be 9.78 acres of land or greater.

***Conclusion/Action Requested:***

Retrofit of the building is still the most environmentally sound option and should be an alternative.

AW-43

Using an alternate site would provide greater access to the services provided. Being embedded and distributed throughout the three beach cities could be a benefit, as was discussed during the BCHD Board election debate. This concept would provide better visibility and access for all taxpayers of the cities of Redondo Beach, Hermosa Beach and Manhattan Beach who fund the BCHD, and whom the BCHD is chartered to serve. Consider an alternative that distributes the RCFE in a location with less environmental impact than is currently proposed.

Lastly, all alternatives currently have the RCFE positioned on the extreme edge of the Northern and Eastern perimeter. Provide a detailed description and photo realistic visualizations of an alternative that provides greater setbacks that would meet the requested Redondo Beach and Torrance requirements.



## Final Considerations



**Project Applicant, Lead Agency, EIR Approver.** This is a highly complex proposal with environmental and health elements and risks would make the most experienced lead agency shudder –

- ✓ demolition of the old South Bay Hospital
- ✓ hazardous materials and nuclear waste
- ✓ PCE, chloroform, and benzene on site
- ✓ 31,000 cubic yards of contaminated ground soil to excavate, trench and grade
- ✓ an unstable slope that towers over homes and backyards and property lines feet away
- ✓ an abandoned oil well on-site to work around
- ✓ a monumentally sized RCFE to construct on the edge of 30 ft. bluff
- ✓ and an elementary school within shouting distance.

AW-44

With a “single scope” public health district acting as the Lead Agency, who themselves would only be a 20% partner in the project, what can go wrong?

If it somehow moves forward for approval, it would need to tap critical police, fire and administrative resources from the City of Redondo Beach and also the City of Torrance, both during construction and in operation. These services are not accounted for in the DEIR. We recently saw a chaotic Prospect Blvd and severe cut-through traffic with an accidental main water line break – and that was simply water.

Things happen and even the best laid mitigation plans can and will go awry at times. Especially when a developer is on a tight schedule, perhaps being incentivized. Especially when mitigation plans are complex, tightly interwoven and dependent, and activities overlap. There is no room for error.

Who will be held accountable for shortcuts, human error, or accidents?

Who will suffer short and long-term negative health impacts

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 11:58 AM  
**To:** Meisinger, Nick  
**Subject:** Fw: Beach city health district living campus

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** bettibps@verizon.net <bettibps@verizon.net>  
**Sent:** Saturday, April 3, 2021 11:48 AM  
**To:** EIR <eir@bchd.org>  
**Subject:** Beach city health district living campus

Hello

AN1-1 | I as Many residents OPPOSE this new development that you are planning on doing on living campus.  
AN1-2 | This is hazardus to our homes and schools. Homes and schools are 80 ft to 350 ft away.  
AN1-3 | The NOISE would be unbearable to our school children trying to learn and residents.  
AN1-3 | WE DON'T WANT CONSTRUCTION TRUCKS ON OUR NEIGHBORHOOD STREETS THAT WILL CAUSE  
AN1-4 | TRAFFIC AND POLLUTION. This will also block views for residents. We have paid a lot of money for our homes in West  
Torrance  
and don't appreciate this development! Please consider doing this development elsewhere and take in consideration  
our homes,neighborhood and schools. There are many other places you can do this development where it won't be so  
close to our homes and schools.  
Thank you for understanding  
concerned home owner and mother.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:04 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: DEIR COMMENT

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**From:** BCHD DEIR <bchd.deir@gmail.com>  
**Sent:** Sunday, May 23, 2021 1:49 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** DEIR COMMENT

BCHD autoresponder states that " Comments pertaining to the technical sufficiency of the Healthy Living Campus Draft Environmental Impact Report will be included in the Final EIR"

AN2-1

This is formal notice that all comments received by BCHD regarding the DEIR either need to be included in the DEIR, even if rejected by BCHDs consultant Wood PLC. The public has an absolute right to know all the comments that were filed.

## Automatic reply: BCHD DEIR PUBLIC COMMENTS - Return Receipt Requested

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**EIR** <[eir@bchd.org](mailto:eir@bchd.org)>  
**To:** BCHD DEIR <[bchd.deir@gmail.com](mailto:bchd.deir@gmail.com)>

Sun, May 23, 2021 at 1:44 PM

Thank you for your message. Comments pertaining to the technical sufficiency of the Healthy Living Campus Draft Environmental Impact Report will be included in the Final EIR, to be released later this year. More information is available at [bchdcampus.org/deir](http://bchdcampus.org/deir) .

The deadline for submitting comments related to the Draft EIR is 5 p.m. (Pacific) on June 10, 2021.

All official Draft EIR public comments received by the June 10 deadline will be included and responded to in the final Environmental Impact Report. Draft EIR comments address the technical sufficiency of the impact analysis, mitigation measures and alternatives. There are numerous methods to submit comments, including:

- Website: Submit an online comment here
- Email: [EIR@bchd.org](mailto:EIR@bchd.org)
- Mail: Nick Meisinger re: Healthy Living Campus  
Wood Environment & Infrastructure Solutions, Inc.  
[9177 Sky Park Ct.](http://9177 Sky Park Ct.)  
San Diego, CA 92123
- Provide oral comments during one of these public opportunities:
  - o Wed., March 24, 6:30 p.m.
  - o Tues., April 13, 6:30 – 8 p.m.
  - o Sat., April 17, Noon – 1:30 p.m.

Again, thank you for your interest in BCHD's Healthy Living Campus Master Plan.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:07 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: DEIR COMMENT

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** BCHD DEIR <bchd.deir@gmail.com>  
**Sent:** Sunday, May 23, 2021 1:52 PM  
**To:** PRR <PRR@bchd.org>  
**Subject:** Fwd: DEIR COMMENT

AN3-1 This is a request for any comments received by BCHD regarding the DEIR during the comments period that BCHD or its consultant Wood PLC does not include in the draft FEIR when it is circulated.

BCHD Over-development, a community group in Redondo Beach

----- Forwarded message -----

**From:** BCHD DEIR <[bchd.deir@gmail.com](mailto:bchd.deir@gmail.com)>  
**Date:** Sun, May 23, 2021 at 1:49 PM  
**Subject:** DEIR COMMENT  
**To:** <[eir@bchd.org](mailto:eir@bchd.org)>

BCHD autoresponder states that " Comments pertaining to the technical sufficiency of the Healthy Living Campus Draft Environmental Impact Report will be included in the Final EIR"

This is formal notice that all comments received by BCHD regarding the DEIR either need to be included in the DEIR, even if rejected by BCHDs consultant Wood PLC. The public has an absolute right to know all the comments that were filed.

## Automatic reply: BCHD DEIR PUBLIC COMMENTS - Return Receipt Requested

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**EIR** <[eir@bchd.org](mailto:eir@bchd.org)>  
**To:** BCHD DEIR <[bchd.deir@gmail.com](mailto:bchd.deir@gmail.com)>

Sun, May 23, 2021 at 1:44 PM

Thank you for your message. Comments pertaining to the technical sufficiency of the Healthy Living Campus Draft Environmental Impact Report will be included in the Final EIR, to be released later this year. More information is available at [bchdcampus.org/deir](http://bchdcampus.org/deir) .

The deadline for submitting comments related to the Draft EIR is 5 p.m. (Pacific) on June 10, 2021.

All official Draft EIR public comments received by the June 10 deadline will be included and responded to in the final Environmental Impact Report. Draft EIR comments address the technical sufficiency of the impact analysis, mitigation measures and alternatives. There are numerous methods to submit comments, including:

- Website: Submit an online comment here
- Email: [EIR@bchd.org](mailto:EIR@bchd.org)
- Mail: Nick Meisinger re: Healthy Living Campus  
Wood Environment & Infrastructure Solutions, Inc.  
[9177 Sky Park Ct.](#)  
San Diego, CA 92123
- Provide oral comments during one of these public opportunities:
  - o Wed., March 24, 6:30 p.m.
  - o Tues., April 13, 6:30 – 8 p.m.
  - o Sat., April 17, Noon – 1:30 p.m.

Again, thank you for your interest in BCHD's Healthy Living Campus Master Plan.



May 24, 2021

Pertaining to the Beach Cities Health District (BCHD) Healthy Living Campus Project, there are many problems. These can be grouped into two categories. These are hazards during construction and long-term quality of life.

AN4-1 The hazards during construction include toxicity from existing building removal, dust, noise pollution, new construction material pollution, and excess traffic. Note that these hazards will likely be present for at least several years as that is the project schedule. The people exposed to these hazards include children at Towers elementary school, children at Beryl elementary school, children walking to Redondo Union high school via the Flagler alley to Prospect Avenue, neighborhood residents near the construction site to include Torrance Pacific South Bay, North Redondo, South Redondo, Dominguez Park, and finally the shopping center on Beryl directly north of the project site.

Some specifics of the hazards include:

- AN4-2 1. The removal of the existing building materials may involve hazards. These materials (potentially Asbestos etc.) could be carried into the above listed neighborhoods and schools by wind. Additionally, dust can be carried into these locations.
- AN4-3 2. There have been several accidents in the Torrance Pacific South Bay neighborhood and the included construction and traffic may add to the risk. Additionally, the traffic may pose a risk to pedestrians in the above-mentioned neighborhoods and schools. Of significant concern is the children walking to Redondo Union via the Flagler alley. Note that some of these students ride skateboards and bikes.
- AN4-4 3. The noise also poses a hazard to neighborhood residents who may need relative quietude and to the Towers and Beryl elementary students who are trying to learn.
- AN4-5 4. The noise, pollution, and traffic may also be a hazard to the shopping center as it will be disruptive to business.

If the project is completed there remain long term quality of life issues for the above-mentioned neighborhoods, schools, and shopping center. Some specifics of the quality-of-life deterioration include:

- AN4-6 1. Due to the number of residents at the Healthy Living Campus there will be more traffic in all the above neighborhoods, schools, and shopping center. The additional traffic may be disruptive and dangerous.
  - AN4-7 2. The additional traffic will increase noise near all the mentioned locations. These locations are currently quiet and peaceful. The peace and quiet may be degraded due to the noise and traffic.
  - AN4-8 3. Due to the size of the project the sea breeze into the Pacific South Bay neighborhood will be disrupted. Some homes and schools may have to spend more money on air conditioning.
  - AN4-9 4. Property values for homes closest to the project will be impacted. The relative quietude will be replaced by a large building which will discourage potential buyers. Thus, the property values may deteriorate.
- AN4-10 In general, there may be severe consequences to neighborhoods, schools, and the shopping center. However, it is unclear what benefit these people and businesses obtain from this project.

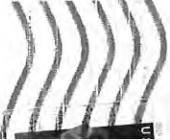
AN4-11 This site is surrounded by neighborhoods, businesses, schools, and playgrounds. Other designs along Lomita Boulevard between Hawthorne Boulevard and Crenshaw Boulevard are not mixed in with neighborhoods and schools. Another comparison is Rosecrans Street between Aviation Boulevard and Pacific Coast Highway has similar designs that are also not mixed in with neighborhoods and schools.

This project does not fit with the existing neighborhoods and schools and creates hazards and long-term quality of life deterioration. We request cancellation of the project.

Two Residents within Pacific South Bay, Torrance, CA



LOS ANGELES CA 900  
25 MAY 2021 PM 12 L



Nick Meisinger  
re: Healthy Living Campaign  
9177 S KY Park Court  
San Diego, CA 92123

92123-434177



## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:39 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: DEIR - I OPPOSE THE BCHD PROJECT

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Skye <skye8577@gmail.com>  
**Sent:** Tuesday, June 8, 2021 12:18 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** DEIR - I OPPOSE THE BCHD PROJECT

Hello,

AN5-1 I oppose the BCHD project. My property will be one of the homes directly impacted by this behemoth size building. Your current modeling and renderings of the buildings are deceiving and do not represent what it will truly look like from all angles, especially from our neighborhood (East of BCHD). Why is there no modeling or renderings from our neighborhood perspective from various angles since we will be most impacted? It should show the variations from sunrise to sundown to understand the magnitude of the shadow it will cast over our neighborhood.

AN5-2 As a long time homeowner and real estate agent, we stand to lose the equity we have acquired through the years should we decide to sell during and post construction with the Staples Center like size building looming over our homes and backyards. We will not be able to sell for top dollar. Will BCHD compensate homeowners for the monetary loss?

Sincerely,  
Pacific South Bay Tract Homeowner

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 2:00 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: DEIR

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**From:** kenak <kenakut@gmail.com>  
**Sent:** Thursday, June 10, 2021 4:57 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** DEIR

To Nick Meisinger

As a lifetime resident of Redondo Beach I enjoy the beach and panoramic views of the PV Peninsula everyday. It's a huge part of Redondo Beach's attraction. When I heard about the BCHD's massive project, I could not believe it.

The DEIR minimizes impacts, makes assumptions on most categories of CEQA, but this comment is on Aesthetics.

AN6-1

The massive assisted living facility is absolutely Incompatible with surrounding neighborhoods. Torrance and Redondo Beach code clearly does not allow it. To state that its impact will be less than significant with a 20 ft. height reduction is clearly wrong.

It would ruin not only the surrounding neighborhoods but all of the South Bay permanently.

Please address the following policy violations in the General Plan for both cities below.

Torrance General Plan Policy LU.2.1. "Require that new development be visually and functionally compatible with existing residential neighborhoods..."

AN6-2

Torrance General Plan Policy LU.3.1. "Require new development to be consistent in scale, mass and character with structures in the surrounding area"

Redondo Beach General Plan Policy 1.46.4. "... 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."

Thank you

**Navarro, Ashlyn**

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:07 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: For 4/13 BCHD Board Meeting - I oppose the proposed BCHD Healthy Living Campus

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**From:** April Telles <afrosttelles@yahoo.com>  
**Sent:** Tuesday, April 13, 2021 9:19 AM  
**To:** Communications <Communications@bchd.org>; EIR <eir@bchd.org>  
**Subject:** For 4/13 BCHD Board Meeting - I oppose the proposed BCHD Healthy Living Campus

**I strongly oppose the Beach Cities Health District (BCHD) Healthy Living Campus (HLC) project as currently proposed.**

**AT-1** **My main concern is the sheer size/height/design of the project. 103 Feet Is Outrageously Tall!**  
- Aesthetically, it does not integrate well into the surrounding neighborhood.  
- It will block air space/flow and cast significant shadows.

**AT-2** - Traffic and Noise Pollution will be greatly increased both during the minimum 5 years of construction and then continue once complete.

**AT-3** - Especially during construction, Those living nearby will suffer increased Health Impacts, breathing particulates released into the air. Kind of ironic for a healthy living project.

**AT-4** - Air Quality and Green House Gas (GHG) Emissions will be significant during construction and once up and running. With Climate Change upon us this is the opposite of what we should be doing.

**AT-5** - Noise & Vibration during construction.

**AT-6** - Hazards & Hazardous Materials especially during construction

**AT-7** - Lastly removal of existing trees, further adding to carbon rather than reducing it.

**AT-7** I have supported BCHD for many years but I will not support the HLC in the future nor participate in any programs BCHD has to offer if this monstrosity is built.

Sincerely,  
April F Telles  
112 Via El Chico  
Redondo Beach 90277

**Navarro, Ashlyn**

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:02 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: HLC DEIR--Letter to N. Meisinger  
**Attachments:** Pinzler\_A+B--HLC DEIR Comments-5-21-21.pdf

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Arlene Pinzler <apinz@roadrunner.com>  
**Sent:** Friday, May 21, 2021 5:22 PM  
**To:** EIR <eir@bchd.org>  
**Cc:** apinz@roadrunner.com <apinz@roadrunner.com>  
**Subject:** HLC DEIR--Letter to N. Meisinger

Please consider the attached letter our response to the Healthy Living Campus Draft EIR.

Thank you.

Arlene and Bob Pinzler

May 21, 2021

Nick Meisinger  
Healthy Living Campus  
Wood Environment & Infrastructure Solutions, Inc.  
9177 Sky Park Ct.  
San Diego, CA 92123

Dear Mr. Meisinger:

As 40-year residents of Redondo Beach, we are writing to express our views on the Beach City Health District's *Healthy Living Campus Master Plan Draft EIR*.

Before we comment on the changes the Beach Cities Health District has made from the 2019 to the 2020 version of its Healthy Living Campus (HLC), as shown in the Draft EIR, we think it is important to point out a fundamental disconnect between the District's stated Objectives and Project Pillars and the actual design it is proposing for Phase 1.

Having attended a number of public meetings since the HLC project was first presented for public input in 2017, by now we are well-schooled in the District's presentations on the benefits this project will bring to the residents of the Beach Cities. The message has always been clear: that the inevitable and significant environmental and social impacts of building this major two-phase multi-year construction project in a quiet residential neighborhood will be readily mitigated by the many new or expanded health, leisure and wellness-promoting programs and activities local residents will enjoy.

ABP-1

Picture grassy, shade tree-dotted "active open space," where asphalt parking lots now stand and indoor spaces where people of all ages can take part in a wide range of free or low-cost programs and activities. Consider the joys of having our own Aquatics Center. Add a new Center For Fitness (to replace the current one), and a Center for Health and Wellness, where a range of educational programs will contribute to an "intergenerational hub of wellness."

While this description may appeal to some Beach Cities residents, even a cursory review of the DEIR for Phase 1 reveals that very few of these promised new programs and facilities will come to our community until after Phase 1 has been constructed. Unlike the 2019 rendition of the HLC project, the 2020 version loads the meat and potatoes (brown rice and quinoa?) of it – memory care and assisted living accommodations for 325 residents, which very few Redondo Beach residents will ever be able to afford – into Phase 1. All the rest – the "goodies" the District has dangled before residents for years now to ease their concerns about the project's size and the appropriateness of a large commercially-run assisted living facility on publicly owned land zoned P-CF (for parks and other public uses) – have been dropped into Phase 2.

In effect, this relegates these proposed new community services and amenities to what can most charitably be described as an extremely uncertain future. The fact is, there is nothing that obligates the District to ever complete Phase 2. Specifically, unless the District's share of the profits from this



ABP-1  
(cont.)

memory care and assisted living business far exceeds what it needs to support its current free and low-cost services – or the District is willing and able to financially obligate itself through bond financing for Phase 2 – it will have ample reason to consider the matter closed. The community will then be left with little more than a seven-story, 220-unit/325 -resident facility for wealthy seniors, most of whom are not from the three cities that the Beach Cities Health District was created to serve. The lawn, plus a few trees and walkways, will not appear until the assisted living facility opens and the original, neglected hospital building at 514 Prospect Ave. (badly overdue for earthquake retrofit and overall modernization) can be torn down.

Now, on to the “improvements” made from the 2019 to the 2020 versions of this HLC project:

One of the requests made repeatedly by residents during the many public meetings on the HLC project over the past 4 years was that they wanted to see plenty of open space – and that new buildings should be reasonable in height, certainly no higher than the existing older building slated for demolition. While the number of assisted living units was reduced from the 2019 to the 2020 version of the project, the building that will house them is now seven stories high. That is three stories higher than the 2019 version. It now rises to a height of 103 feet above ground level -- 27 feet higher than the existing 76-foot-high building. That represents a 36 percent increase in building height over the current old building. This visual blight will tower even higher over the Flagler side of the project, which overlooks the adjacent homes in Torrance – a full 133.5 feet above ground level. At the same time that it worsens the already imposing presence of the District’s existing buildings over the adjacent residential neighborhoods, a structure of this height will also substantially block views of the Palos Verdes ridgeline.

ABP-2

It is almost as though the District decided to toss out residents’ concerns over traffic and visual blight and go for broke with the design shown in this DEIR. Think what heroes they will look like when, after maximizing the size of this new building, they somehow find a way to whittle it down again in response to what they must have known would be strong community push-back.

Lest anyone buy into the notion that the higher profile for the memory care and assisted living facility was chosen to reduce its footprint and provide more open space, in the process of raising the building’s height, the District also somehow managed to pare down the “active green space” the project sets aside from 3.6 acres in 2019 to 2.45 acres in the 2020 plan. That is a 32% reduction in green space, paired with a three-story increase (since 2019) in the height of the building.

Despite this reduction in active green space in the 2020 version, the DEIR features a rendering of the HLC campus that still gives the impression we can expect a sizable expanse of lawn – “the size of two soccer fields” the DEIR says – thus giving a park-like feel to the center of the campus. This is a puzzling assertion, since “Alternative 1 – No Project Alternative (Demolish and Replace with Limited Open Space)” in the DEIR states that tearing down the old former hospital building and building nothing else would leave “limited open space.”

The reduction in active open space from the 2019 to the 2020 version would, by itself, be enough reason to reject the current proposed design, since it ignores the residents’ repeated requests for more, not less, active green space. However, a review of the proposed layout of Phase 1 of the HLC project makes

ABP-2  
(cont.)

it clear that this reduced amount of active green space that will be left once Phase 1 is completed will be whittled down even further once the Aquatics Center, Community Wellness Pavilion, Center for Fitness and an adjacent seven or eight-story parking garage have been built.

Ironically, if Phase 1 moves forward through construction as currently designed, its impacts on traffic, air quality and other measures of “quality of life” that concerned residents have continually spoken about will likely be so great that the prospect of any further construction on the District’s publicly-owned property would almost certainly spur vigorous local opposition to Phase 2 from Redondo Beach residents.

Not to worry, because, even if the District never puts forward an acceptable design and funding plan for Phase 2, it will already have ticked the boxes next to its two most pressing needs. These are the two essential goals that are the HLC project’s reason for being. Yet, they are easy to glance past in the DEIR, given the lofty-sounding verbiage the District uses to describe its “Objectives” and “Project Pillars.”

These essential goals would be to:

ABP-3

- 1.) Establish the steady cash flow it has repeatedly said it needs to continue providing its existing free and low-cost wellness-promoting services and plan for more in the future. (A chart showing the actual end date when the District would run out of money to support its programs, has been standard fare in the District’s PowerPoint presentations for years now.)
- 2.) Proceed with the demolition of its long-neglected (by the District), potentially hazardous (long overdue for earthquake retrofit) and very outdated former hospital building, which was built 60 years ago by the former South Bay Hospital District to meet the needs of a then hospital-poor Beach Cities community.

Upon completion of Phase 1, the District will ostensibly be rescued financially (for how long remains unclear, since very few of this project’s financial details have been shared with the public). Even if Phase 2 never materializes, the community residents who have endured the environmental and social impacts of building and operating a new 325-resident, commercially-run memory care and assisted living facility in their quiet residential neighborhood will have nothing more to show for their sacrifice than they do now. It will be as though the DEIR’s Alternative 4 – “Phase 1 Preliminary Site Development Plan Only” has become the final HLC project by default.

#### CONCLUSIONS:

ABP-4

This DEIR’s wording of the HLC’s Objectives and Project Pillars seems deliberately intended to persuade the reader that this project would be a natural extension of what the District has already been doing in our community. What it would be, in fact, is a giant leap forward in the mission creep the District has succumbed to over the past several years. While the District was granted a CUP many years ago to create 60 units of housing (for 120 memory care patients) operated by Silverado Memory Care in the existing old hospital building, this was by no means an open invitation to jump from there to building and filling a brand-new building with 325 people needing memory care or assisted living services. All the

ABP-4  
(cont.)

DEIR's fancy verbiage and references to environmental impacts it deems either "insignificant" or beyond mitigation (thus making them acceptable?) cannot smooth a path toward a commercial use as large as this proposed new seven-story facility. It has no place on property located in a quiet residential area, on a campus that is owned by a public agency and zoned P-CF.

ABP-5

It is indefensible to subject Redondo Beach and Torrance residents, including families with children in nearby schools, to the noise, dust, traffic disruption, poorer air quality and visual blight caused by this three-year construction project (for Phase 1 alone). Even once the construction phase is completed, for decades to come, local residents will be left to gaze up at a structure far higher than the building the District plans to demolish, and to endure the related impacts on traffic, public safety and other local services that a business of this size will cause. As if all this were not enough, the majority of Redondo Beach residents will never be able to afford to live in this facility, thus making it an even less appropriate use of the District's property.

ABP-6

It is simply not the job of the Beach Cities Health District – a public agency that continues to depend, at least in part, on public funding from its three member cities – to provide expensive, commercially-run memory and assisted living care to seniors, regardless of the rosy picture its market specialists paint about the likely high demand for this service in its target area (the Beach Cities and beyond) in the years ahead. Despite the cozy "public-private partnership" cloak in which the Beach Cities Health District has wrapped this project, this will be nothing more than a new business venture – and it should be built and operated on commercial property only.

Thank you for your consideration.

Sincerely,

Arlene and Bob Pinzler  
Redondo Beach

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:41 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Oppose

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Barbara Epstein <justbarb56@gmail.com>  
**Sent:** Wednesday, June 9, 2021 11:44 AM  
**To:** EIR <eir@bchd.org>  
**Subject:** Oppose

- BE-1 | 1) This project harms the neighboring communities and school with unreasonable physical and mental health risks during the long construction progress. It will be too great a burden for the public to bear with no resulting benefits to the public.
- BE-2 | 2) This EIR is flawed. See others' communications for specific details.
- BE-3 | 3) The structures deemed unsafe have many good years of service left.
- BE-4 | 4) The proposed elevations of new structures are far too high and large and will impose unacceptable visual and sun-blocking mass to the skyline at the site. It is out of line with the neighborhood.
- BE-5 | 5) Redondo Beach has already been victimized for too long by gifting public lands and assets to private entrepreneurs for private gain, robbing the public of their rightful ownership and property decisions.  
This immoral tradition must be stopped in the City of Redondo Beach.
- BE-6 | 6) This project has no value to the public. The cost of the senior care will be too high for anyone to afford. If this use of public property is deemed so critical then it should be provided, solely non-profit, provided at basic cost and subsidies that any senior could afford.
- BE-7 | 7) If the present buildings are so unsafe, take them down and plant an urban forest, community garden, workout areas, and nature park to provide a place for healthy exercise, growing healthy food, and restful relaxation and meditation.
- BE-8 | This project has advanced forward against the will of the public. It should be abandoned.

Barbara Epstein  
Redondo Beach

Sent from my iPad

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:42 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: I am opposed!

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** BONNIE PIERCE <bonpierce@msn.com>  
**Sent:** Wednesday, June 9, 2021 1:48 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** I am opposed!

BP-1 | I live within one mile of the Old South Bay Hospital. I pass by it a few times a week. This project is oversized and out of proportion to this area.  
Even after making adjustments to the original plan, it will overwhelm the neighborhood.

Bonnie Pierce  
1714 Huntington Lane  
#A  
Redondo Beach, CA 90278

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 11:58 AM  
**To:** Meisinger, Nick  
**Subject:** Fw: NO TO OVER DEVELOPMENT

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Brian Onizuka <brianonizuka@gmail.com>  
**Sent:** Sunday, April 4, 2021 4:14 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** NO TO OVER DEVELOPMENT

To whom it may concern,

BO-1 This is a terrible terrible idea who ever thought of it and even allowed it to get this far should be fired. This is not wanted or needed in Torrance. There is already heavy traffic from towers elementary school and any obstruction to Flagler should be a non starter. The traffic from towers elementary school is already bad as is for the residents of our local community. People that live here day in and day out know this. Torrance and Redondo is a great community and doesn't need to be over developed. We have plenty of income revenue from the local del amo mall, refinery, and recent development from Redondo shoreline development. This facility is not needed and out of touch with the needs of the community. Go build this crap somewhere else, not in our community.

If your so inclined to develop this community develop the local parks, bike lane routes, schools etc. your always welcome to do that. But do not build this monstrosity and obscure my beautiful city.

Regards,  
5500 block of towers street resident.



**From:** [EIR](#)  
**To:** [Meisinger, Nick](#)  
**Subject:** Fw: Public Comments relating to the EIR for the BCHD "HLC" project  
**Date:** Tuesday, June 15, 2021 1:33:46 PM  
**Attachments:** [trafficout.pdf](#)  
[greenhouse.pdf](#)  
[Public Comments on BCHD DEIR Cumulative Impacts XBP a rev 1.pdf](#)  
[3.4 CULTURAL RESOURCES AND TRIBAL CULTURAL RESOURCES.docx](#)  
[BCHD LAFCO SOI Public Comment to the DEIR .docx](#)  
[DEIR Substation comments .docx](#)  
[references6 \(1\) \(1\).xlsx](#)

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**From:** B W <brianjwolfson@gmail.com>  
**Sent:** Friday, June 4, 2021 1:59 PM  
**To:** EIR <eir@bchd.org>  
**Cc:** Bill.brand@redondo.org <Bill.brand@redondo.org>; todd.loewenstein@redondo.org <todd.loewenstein@redondo.org>; nils.nehrenheim@redondo.org <nils.nehrenheim@redondo.org>; christian.horvath@redondo.org <christian.horvath@redondo.org>; laura.emdee@redondo.org <laura.emdee@redondo.org>; zein.obaji@redondo.org <zein.obaji@redondo.org>  
**Subject:** Public Comments relating to the EIR for the BCHD "HLC" project

**Nick Meisinger re: Healthy Living Campus  
Wood Environment & Infrastructure Solutions, Inc.  
9177 Sky Park Ct.  
San Diego, CA 92123**

**Regarding:  
Beach Cities Health District Healthy Living Campus Project, DEIR No.  
2019060258  
AKA HLC  
Draft Environmental Impact Report ("DEIR")**

**Dear Mr. Meisinger:**

**In addition to other public comments I may wish to file, enclosed are public comments I am making regarding the BCHD DEIR HLC Project. I find the aforementioned DEIR inadequate and incomplete, and lacking sufficient mitigations to ensure the environmental safety of Torrance and Redondo Beach residents who will suffer the most if this project is approved.**

**Please provide me with a receipt for this submission and also add my email address to any and all future meeting notices associated with this project that**

**Wood and the BCHD may participate in or will conduct.**

**Thank you,  
Bian Wolfson  
City of Torrance**

**CEQA Regulation(s):** Section 15126 states in part: “Significant effects of the project on the environment shall be clearly identified and described.”

Section 15123 states in part: “an EIR shall identify areas of controversy known to the lead agency, including issues raised by public agencies as well as interested members of the public.”

**DEIR Page(s):** 719, Appendices J and K

The DEIR Transportation/Traffic Analysis is Deficient in *Twenty-one* Regards. They cover a wide spectrum of concerns.

- \* The *magnitude* of traffic impacts are not described.
- \* The Level of Service (LOS) Analysis is deficient.
- \* No analysis of transportation network deficiencies was conducted.
- \* The significance of documented collision data was ignored.
- \* The significance of cut-through traffic data was ignored.
- \* An incorrect conclusion was drawn about the impact of the design on vehicle traffic and pedestrians.
- \* The utility of the existing curb cut on Beryl Street is misrepresented.
- \* An incorrect conclusion was drawn about the impact of the design on vehicle traffic and pedestrians.
- \* The DEIR focuses almost exclusively on the analysis of vehicles miles traveled and nothing else.

BW1-1  
(cont.)

- \* The proposed project solution *increases* cut-through traffic rather than decreases it.
- \* The explanation of traffic metrics and their justifications is inadequate.
- \* The effects of traffic induced greenhouse gas (GHG) emissions is missing.
- \* The consequences of HLC services to citizens outside of the beach cities is not analyzed.
- \* The DEIR does not adequately study of impacts and mitigations regarding revenue efforts.
- \* The content of the Transportation Demand Plan (TDP) must be expanded.
- \* Construction traffic impacts are not adequately analyzed.
- \* Construction worker parking access impacts are not analyzed.
- \* Bicycle traffic and usage are not analyzed
- \* Transportation/ Traffic Emergency Access provisions are missing
- \* Analysis of the impact on bus lines service the project area is incomplete.
- \* BCHD claims for allocation and use of RCFE funds for transportation improvements are not substantiated.
- \* Little coordination with the city of Torrance was conducted.

These deficiencies are so numerous that it is almost impossible to present them in any logical order. Instead, they appear here merely in the

BW1-1  
(cont.)

sequence listed above with a leading integer to denote the end of one item and the beginning of the next.

The overall conclusion, however, is obvious. The traffic analysis for the EIR must be completely redone.

BW1-2

1. Designation of an environmental impact as *significant* does not excuse the EIR's failure to reasonably describe the *magnitude* of the impact.

An EIR's designation of a particular adverse environmental effect as "significant" does not excuse the EIR's failure to reasonably describe the magnitude of the impact. In a recent court case [Ref: 3.2.85] the EIR was deemed insufficient because it identified significant air quality impacts but failed to discuss the extent of such impacts.

## 2. The Level of Service (LOS) Analysis is Deficient

The Fehr & Peers Intersection Operation Evaluation in Appendix J contains a detailed assessment of traffic circulation issues, with particular focus on the potential for *increases in congestion*.

BW1-3

a. The evaluation studied 25 intersections near the HLC project site (19 signalized) and determined for each the Level of Service from A to F. Level A represents little or no delay and Level F extreme traffic delays with intersection capacity exceeded.

Appendix J page 25 (J-24) table 5 presents the definitions for all six categories. Appendix J page 26 table 6 lists six intersections that will operate at a LOS of E or F.

An E designation means the condition of the intersection is *poor*. It implies there may be long lines of waiting vehicles through several signal cycles. An F denotes *failure*. Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the

intersection approaches. Tremendous delays with continuously increasing queue lengths.

b. Appendix J page 36 (J-35) Table 9 summarizes the results of the AM and PM peak hour intersection LOS analysis for Cumulative plus Project conditions. This is an important Table to be fully aware of.

Based on the analysis, *seven* intersections are projected to operate at LOS E or F during one or both peak hours if the Project is approved.

- Flagler Lane & 190th Street (AM & PM peak hour)
- Inglewood Avenue & 190th Street (PM peak hour)
- Harkness Lane & Beryl Street (AM & PM peak hour)
- Flagler Lane & Beryl Street (AM & PM peak hour)
- Redbeam Avenue & Del Amo Boulevard (AM & PM peak hour)
- Anza Avenue & Del Amo Boulevard (PM peak hour)
- Hawthorne Boulevard & Del Amo Boulevard (AM & PM peak hour).

c. At these seven most affected intersections, *even with mitigations*, the proposed Project as envisioned will have a lasting and significant impact on local and regional traffic.

This Transportation evaluation shows unmistakably that the greatest environmental impacts will, however, be in the city of Torrance. They will fall disproportionately on Flagler Lane and Beryl Street and on the Pacific South Bay neighborhood 80 feet east of the project.

These transportation impacts, as noted on Appendix J page 28(J-27), will occur all through the *5+-year period* of construction and for the duration of the *50-to-99-year* operation of the HLC project and “with other cumulative traffic in the area, would generate increases in CO<sub>2</sub> levels near local intersections.”

d. The BCHD's determination that there is no further mitigation measure for these intersections is mind-boggling. More robust mitigation efforts *must* be explored. [See: 2.3.5] for example.

These investigations for the Final EIR *must* also include:

i. Adding monitored freeway on- and off-ramp intersections where the project adds 50 or more trips.

ii. Freeway monitoring if the project will add 150 or more trips in either direction during AM or PM weekday peak hours as recommended by Caltrans.

iii. Reviews of intermediate milestones with consultation of local jurisdiction experts prior to buildout

iv. Addition of *private* service roads on the HLC project site.

v. Incorporation of on-site circulation roads for service vehicles from Beryl Avenue and Prospect Avenue with setbacks of at least 12 feet

vi. Exploration of investigations present in [See: 2.3.5]

DEIR page (3.2-52) Air Quality, lists only five of the seven intersections as having problems.

Why are these results inconsistent? The EIR must resolve this inconsistency

3. No analysis of transportation network deficiencies was conducted

DEIR page 746 (3.14-28) asserts that both Phase 1 and Phase 2 HLC development plans would not conflict with transportation plans, policies or regulations and therefore project impacts would be less than significant with mitigation.



BW1-5  
(cont.)

DEIR page 730 (Table 3.14-1). Existing Public Transit Services in the Project Area does provide a *small* amount of data regarding public transit. Yet, there is no indication in the DEIR that there was *any* analysis directed at reducing the deficiencies of the transportation network or that any development resources are to be set aside to make improvements in the event the proposed project is approved. There is no indication to work with the six county transportation commissions (CTCs) used by the Southern California Association of Governments (SCAG). Are these a proper action for an organization that touts its benefits to the community?

#### 4. The significance of documented collision data was ignored.

BW1-6

DEIR page 736 (3.14-18) states that “There are no discernable existing hazards in the vicinity of the Project site due to roadway and driveway configuration.”

Yet, also on Page 736 and in Appendix K, it is stated that “323 collisions occurred within the vicinity of the Project.”

*Over three hundred* is not a small number. It strongly suggests that there is an immediate and serious traffic safety issue in the vicinity of the project. Mitigation analysis of these hazards *must* be conducted.

#### 5. The significance of cut-through traffic data was ignored.

BW1-7

DEIR page 737 (3.14-19) states “As arterial roads become increasingly congested, drivers often seek out ways for avoiding traffic jams. This is usually done by cutting through residential neighborhoods to avoid heavy traffic on arterial roads. This phenomenon is referred to as “cut-through traffic.”

Yet, despite this recognition, there is no indication in the DEIR that any resources will be directed to mitigate, control or address the longstanding problem that would become even more acute with the

BW1-7  
(cont.)

operation of the HLC. The scope and utilization plan for these resources *must* be provided as part of the EIR.

6. An incorrect conclusion was drawn about the impact of the design on vehicle traffic and pedestrians.

The DEIR page 736 (3.14-18) states “There are no discernable existing hazards in the vicinity of the Project site due to roadway and driveway configuration.”

Further, the DEIR page 781 (3.14-63) states “Vehicle traffic from the proposed one-way driveway and service entrance along Flagler Lane would not contribute to pedestrian safety hazards given that there is no sidewalk along the west side of Flagler Lane south of its intersection with Beryl Street.”

BW1-8

Yet, the EIR states “BCHD is coordinating the BCHD Bike Path Project (separate from the proposed Project) with the City of Redondo Beach and the City Torrance to develop a formal protected Class I bicycle path along Flagler Lane east of the Project site to connect the existing Class II bicycle lanes on Diamond Street and Beryl Street. The Bike Path Project would also develop sidewalks along the west side of Diamond Street north of Prospect Avenue and the *west* side of Flagler Lane south of Beryl Street, where there are currently no sidewalks.”

The DEIR conclusions on pages 736 and 781 are patently false. They are asserted with no data that sustain them. The missing safety analyses and impacts on vehicles and pedestrians *must* be provided as part of the EIR analysis.

Given that existing site access is currently limited to the three driveways along North Prospect Avenue, the additional proposed access point off of Beryl Street is not needed. It would be better to distribute Project-related vehicle traffic to North Prospect as it is, and reduce the potential for vehicle-pedestrian and vehicle-bicyclist interactions on Beryl and

BW1-8  
(cont.)

Flagler where the bike path is being designed. The impact of this alternative *must* be included in the EIR.

7. The utility of the existing curb cut on Beryl Street is misrepresented.

The DEIR misleadingly states “While there is an existing curb cut and driveway into the vacant Flagler Lot, the lot is currently closed off with a gate and does not permit vehicle entry.”

BW1-9

Yes, at the *direction* of BCHD, the Beryl entrance into the Flagler lot is *temporarily* closed off to protect the assets of a BCHD leasee. The DEIR fails to mention that the existing curb cut on Beryl has been in use for more than 25 years to access the Flagler lot – for such activities as selling trees for Christmas and pumpkins for Halloween. [Ref: 3.2.83] There is no compelling justification in the DEIR for the need for additional access points for the HLC. This misrepresentation *must* be corrected.

8. The DEIR focuses almost exclusively on the analysis of vehicles miles traveled and nothing else

BW1-10

Yes, Senate Bill 743 requires that the amount of driving and length of trips as measured by “vehicle miles traveled” or VMT be used to assess transportation impacts on the environment for CEQA review.

But, that is the *total* extent of the traffic analysis presented in the DEIR. Evidently, the statement “...VMT be used to assess transportation impacts...” is being interpreted by BCHD to mean that VMT is the *only* data to examine. No other analyses were conducted. The impact on conclusions, cut-through traffic and pedestrian safety have been totally ignored. They *must* be addressed in the EIR.

BW1-11

9. The proposed project solution increases cut-through traffic rather than decrease it

BW1-11  
(cont.)

The DEIR page 895 (5-49) states “Implementation of a permanent closure of southbound traffic on Flagler Lane south of Beryl Street would preclude access for service and delivery vehicles to the subterranean proposed service area and loading dock under the proposed Project.”

Yet, under the proposed Project service and delivery vehicles could choose to drive through the Torrance neighborhood to enter the service area and loading dock entrance. This would *increase* cut-through traffic and conflict with what presently already exists. The proposed design *exacerbates* existing problems rather than *mitigate* them. The EIR must analyze and propose mitigations that properly consider all of the contributing circumstances.

10. The explanation of traffic metrics and their justifications is inadequate

BW1-12

In the DEIR, the criteria for transportation impacts are declared to be either “less than substantial” or “less than substantial with mitigations” without sufficient detail to determine what exactly the residual impacts of the mitigations are. The EIR must explain and adequately quantify what the word “substantial” means for the transportation and air quality impacts.

To what *quantitative* extent are the transportation impacts reduced?

11. The effects of traffic induced greenhouse gas (GHG) emissions is missing

BW1-13

On Page 3.14-24 it is stated: “Under SB 743, the focus of transportation analysis shifts from LOS to VMT and the reduction of GHG emissions through the creation of multimodal transportation networks and promotion of a mix of land uses to reduce VMT.”

Yet, what is proposed in the DEIR in this regard is not present or is vague.

The EIR *must* provide a clear definition of what types of traffic control and suppression elements will be included in the development plan.

The mitigation efforts proposed in the EIR *must* aim for reductions in *all* transportation-related activities. Any increases in gas emissions should be considered significant and be *fully* mitigated.

Mitigation measures must include additional funds to provide financial benefits to local governments that have designated Priority Development Areas (PDAs). This mitigation should include accessing additional funding sources including Safe Routes to Transit, and the \$7 billion in Local Streets and Roads funding.

BW1-13  
(cont.)

This mitigation *must* be feasible and reduce greenhouse gases by encouraging transit-oriented development near bus and rail stations. Mitigation T-3 proposes for regional and local agencies and employers to promote innovative parking strategies. This measure should also include a parking cash-out program (opt-out), which could feasibly integrate pricing for otherwise free or underpriced parking into regional parking policies and practices.

The DEIR does not adequately leverage transit investments to mitigate greenhouse gas impacts of roadway expansion. It does not require a mix of uses at stations; it sets targets far too low, and excuses some projects from any requirements at all.

If BCHD truly subscribes to the tenant of improving the health of all beach city residents, it *must* become a leader in fostering and supporting healthy planet initiatives. Helping seven billion people is a far more impactful goal than helping a few hundred.

The BCHD asserts that some of the funds from the RCFE will be used for implementing greenhouse gas reduction efforts, but critical parameters are missing:

- a. The percentage of gross income allocated
- b. The growth rate of GHG emission growth over the project lifetime.
- c. Explanation what the future needs are and what environmental impacts these increased services actually have.

The EIR must analyze a comparison between the “2021”, “2035 No Project” and “2035 Project” scenarios at the same fleet engine assumptions so that the impacts of expansions can be reflected and compared to 2021 conditions.

12. The consequences of HLC services to citizens outside of the beach cities is not analyzed

- a. Has the BCHD received authorization from LAFCO to expand its sphere of influence? The EIR *must* calculate how many clients are presently being served who reside outside the geographic border of the beach cities.
- b. Has the BCHD conducted a study to determine how these clients currently receive services?

What will be the associated cost to the BCHD to provide services to these clients? The EIR *must* include specific data regarding marketing, transportation costs, and GHG impacts tied to VMT.

13. The DEIR does not adequately study of impacts and mitigations regarding revenue efforts.

DEIR page 757 (3.14-39) states “Trip generation estimates for new uses were based on available programming information provided by BCHD. ITE does not provide a trip generation rate for aquatic centers such as the one proposed as part of the Phase 2 development program.”

While the possibility of using revenue for future programs is put forward, there are no plans articulated for expanding such programs. The 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. In the DEIR, no data is provided to determine the impact of expected future activities.

Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential for conflicts with the established measures of effectiveness for the performance of the circulation system that are within the jurisdiction and responsibility of Lead Agencies.

Where the BCHD has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures that ensure compliance with the adopted Congestion Management Plan, and other adopted local plans and policies, as applicable and feasible.

Compliance can be achieved through adopting transportation mitigation measures as set forth below, or through other comparable measures identified by the BCHD as the Lead Agency:

- a. Fund capital improvement projects to accommodate future traffic demand in the area.
- b. Install pedestrian safety elements (such as cross walk striping, curb ramps, countdown signals, bulb outs, etc.) to encourage convenient crossing at arterials.



BW1-16

Because the commercial components of the Proposed Project will not only serve beach cities residents, the EIR needs to state how many trips might come from outside the surrounding area. What cities will be served? How far will the clients travel? What routes and services will be impacted? The DEIR erroneously reduces VMT without adequate attention to all data. This shortfall *must* be fixed in the EIR

14. The content of the Transportation Demand Plan (TDP) must be expanded

BCHD *must* prepare and *submit* a Transportation Demand Management Plan (TMP) to the cities of Redondo Beach and Torrance prior to the issuance of the first building permit for the Project. A final TDM Plan must be submitted and approved by the cities prior to the issuance of the first certificate of occupancy for the Project. All versions of the TDM plan *must* include the items listed below:

BW1-17

- a. All strategies listed Mitigation Measure T-1
- b. Adherence to all other local traffic and/or congestion management plans
- c. 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.
- d. Mitigation plan for the transportation-related impacts and calculated increase of VMTs for anticipated special events.
- e. Establishment of policies and programs to reduce onsite parking demand and promote ride-sharing and public transit for events on-site, including:
  - i. Promotion of the use of on-site parking rates offered at reduced rates

ii. Requiring special event center operators to advertise and offer discounted transit passes with event tickets

iii. Requiring special event center operators to advertise and offer discount parking incentives to carpooling patrons, with four or more persons per vehicle for on-site parking

iv. Requiring designation of a certain percentage of parking spaces for ride sharing vehicles.

BW1-17  
(cont.)

f. The plan to build or fund a major transit stop within or near transit development upon consultation with the six applicable county transportation commissions (CTCs).

g. The plans to purchase, and/or create incentives for purchasing, low or zero emission vehicles.

h. Inclusion of construction related provisions listed in item 15 below.

i. Inclusion of the bicycle related provisions listed in item 16 below.

j. Accepts the right for the cities of Redondo Beach and Torrance to levy fines for non-compliance with the TDMP.

15. Construction traffic impacts are not adequately analyzed.

BW1-18

A detailed Construction Worksite Traffic Control Plan (CWTCP) *must* be prepared and included as part of all versions of the TDMP described in item 13 above. The following items concerning construction equipment and personnel travel *must* be addressed in the CWTCP.

BW1-18  
(cont.)

- a. Specification of strategies that reduce traffic congestion during construction of this project and other nearby projects that could be simultaneously under construction
- b. Scheduling of all truck trips that avoid peak traffic hours.
- c. Distribution to all households along the designated routes at least 10 days in advance of any activity.
- d. Notification to public safety personnel of major deliveries, detours, and lane closures.
- e. Publishing and distribution to nearby residents, the traffic departments of Redondo Beach and Torrance the process for responding to and tracking of complaints pertaining to construction activity including the identity of an onsite complaint manager.
- f. Provision that the manager shall determine the cause of the complaints and shall take prompt action to correct the problem. The cities of Redondo Beach and Torrance and/or other appropriate government agency shall be informed who the manager is prior to the issuance of the first permit.
- g. Provides a detailed provision for accommodation of pedestrian and bicyclist flow.
- h. Determination 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 including, but not limited to:
  - \* VMT and travel demand measures
  - \* Other standards established by the county congestion management plan.

If such a determination is made, the contractor shall adopt the plan recommended by the California, Department of Transportation.

BW1-18  
(cont.)

- i. Ensures that access will remain unobstructed for land uses in proximity to the project site during project construction.
- j. Coordination with the Redondo Beach and Torrance emergency service providers to ensure adequate access is maintained to the project site and neighboring businesses and residences.

#### 16. Construction worker parking access impacts are not analyzed

A detailed Construction Worker Traffic Plan (CWTP) *must* be prepared and included as part of all versions of the TDM plan described in item 13 above. The follow items concerning construction equipment and personnel travel *must* be addressed in the CWTP.

BW1-19

- a. Makes provision for parking management and designated spaces for all construction workers to ensure that *all* construction workers do not park in or on street spaces.
- b. Guarantees that damage to the street caused by heavy equipment, or as a result of this construction, shall be repaired, at the project's expense.
- c. Specifies that within one week of the occurrence of the damage (or excessive wear), repair will be made -- unless further damage/excessive wear may continue; in such case, repair shall occur prior to issuance of a final inspection of the building permit.
- d. Specifies that all damage that is a threat to public health or safety shall be repaired immediately.
- e. Specifies that when such damage has occurred, the street shall be restored to its condition prior to the new construction as established by

the cities of Redondo Beach or Torrance (or other appropriate government agency) and/or photo documentation, at the BCHD's expense, before the issuance of a Certificate of Occupancy.

f. Specifies that all heavy equipment brought to the construction site shall be transported by truck

BW1-19  
(cont.)

g. Specifies that no materials or equipment shall be stored on the traveled roadway at any time.

h. Specifies that prior to the onset of demolition, excavation, or construction, portable toilet facilities and a debris box shall be installed on the site and properly maintained through project completion.

i. Specifies that, prior to the end of each work-day during construction, the contractor or contractors shall pick up and properly dispose of all litter resulting from or related to the project, whether located on the property, within the public rights-of-way, or properties of adjacent or nearby neighbors.

#### 17. Bicycle traffic and usage are not sufficiently analyzed.

Motor vehicles are not the only mode of transportation that must be analyzed in the EIR. The HLC is reputed to be open to all residents of the beach cities – regardless of their mode of transport for getting there. A bike path is proposed adjacent to the HLC. It is reasonable to assume that bicyclists will be among those wishing to visit the facility.

BW1-20

A detailed Bicycle Usage Plan (BUP) must be prepared and included as part of all versions of the TDM plan described in item 13 above. The follow items concerning bicycle travel *must* be addressed in the BUP.

a. The number of units that will provide nearby bicycle parking spaces.

b. The number of residential bicycle parking spaces and charging stations would be provided for the commercial component of the HLC.

c. The number of bicycle parking spaces that ensures sufficiency to accommodate 5 to 10 percent of projected use at all public and commercial facilities in the HLC.

d. The plan for a self-service bicycle repair area.

e. The detailed description of the signage and striping onsite to encourage bike safety.

f. Accommodations planned for a Guaranteed ride home program.

g. The plan to restrict construction related traffic to off-peak bicycle operation hours.

h. The plan to work with the school districts to improve pedestrian and bike access to schools.

i. The plan to contribute a one-time fixed fee contribution to be deposited into the Bicycle Plan Trust Funds of the cities of Redondo Beach and Torrance.

j. The plan, in coordination with all appropriate agencies, to establish ordinances limiting the hours when deliveries can be made to off peak hours.

k. The plan to promote the use of bicycles by providing space for the operation of valet bicycle parking service.

l. The plan to ensure that the detailed design relating to delivery truck loading and unloading taking place on site has no vehicles having to back into the project via the proposed project driveways on any adjacent street.

BW1-20  
(cont.)

m. The plans to develop a Bicycle Safety Program or a bicycle safety educational program to teach drivers and riders the laws, riding protocols, routes, safety tips, and emergency maneuvers at the HLC.

18. Transportation/Traffic Emergency Access provisions are missing

BW1-21

The construction work site traffic control plan (CWTCP) *must* ensure that access will remain unobstructed for land uses in proximity to the project site during project construction. Coordinate with the Cities and emergency service providers to ensure adequate access is maintained to the project site and neighboring businesses and residences.

19. Analysis of the impact on bus lines service the project area is incomplete.

This analysis *must* be expanded to include the following information.

a. The average daily ridership on the Bus Lines serving the project area.

BW1-22

b. Use these data as part of the analysis to determine the worker and overall VMT baseline.

c. The bus routes paralleling the existing service that support the DEIR conclusions outlined in the VMT and transportation-related impacts

d. A list of all intersections studied and the existing number of vehicles on the roadways each day.

BW1-23

20. BCHD claims for allocation and use of RCFE funds for transportation improvements are not substantiated.



The BCHD asserts that some of the funds from the RCFE will be used for implementing transportation improvements. This assertion *must* be made more specific.

BW1-23  
(cont.)

The DEIR claims that the funds derived from the RCFE will be used for programming, but there isn't any attempt to factor in what that transportation growth is forecasted to be and what its impact will be on GHG, air quality, and public transportation. This *must* be clarified and additional data added that explains what these future needs are and what the environmental impacts of these services are.

21. Little coordination with the city of Torrance was conducted.

Even Fehr & Peers states that future changes to Flagler Lane by the City of Torrance to reduce LOS were never considered.

BW1-24

Twenty-one significant deficiencies! The number is high because of the total inappropriateness of placing the HLC in the very midst of a heavily populated residential area.

For more on the impact of traffic on greenhouse gas emission, [See: 2.3.5, sub-argument 8]

Conclusion: The EIR *must* correct *all* traffic mitigation deficiencies and state that compliance will be monitored

**CEQA Reference(s):** Sections 15126.2(b) states in part:

“In addition to building code compliance, other relevant considerations may include, among others, the project’s size, location, orientation, equipment use and any renewable energy features that could be incorporated into the project.”

Section 15092, subsection (b)(2)(A) states in part: “A public agency shall not decide to approve or carry out a project for which an EIR was prepared unless... 2) the agency has... *eliminated or substantially lessened* all significant effects on the environment where feasible.” (emphasis added)

**BW1-25 DEIR Page(s):** 439 (3.7-1), Appendix J

- \* We all have a responsibility to be proactive in reducing the generation of greenhouse gasses.
- \* BCHD, as a health district should be showing leadership in this regard.
- \* BCHD shows no empathy with the community it serves.
- \* BCHD does not adequately address CEQA requirements.
- \* BCHD must elect to adopt a proactive approach, but does not.
- \* The DEIR does not analyze Bike Path impacts.
- \* The DEIR does not analyze the impacts on other civic activities.
- \* No Phase 2 actions are proposed.

**BW1-26**

1. We *all* have a responsibility to be proactive in reducing the generation of greenhouse gasses.

The California Supreme Court, as stated in *Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2017) 3 Cal.5th 497, 504 (SANDAG).<sup>4</sup> has repeatedly held that GHG law continues to evolve, and lead agencies have an obligation under CEQA to “stay in step.” [Ref: 3.2.127]

The fact that the California Supreme Court recognizes the urgency for public agencies to “stay in step” is significant. All proposed projects which will generate GHG emissions either directly or indirectly have a moral obligation to substantially reduce these effects on our environment.

BW1-26  
(cont.)

It is urgent, as President Biden noted in April, during the international climate summit, a call to cut GHG emissions by 50%. Telling an audience of 40 world leaders “We have to get this done”. Biden wants all electricity in the U.S. to come from carbon-free sources by 2035. He described a need to seal off abandoned wells and mines, “putting a stop to the methane leaks and protecting the health of our communities.” [Ref: 3.2.128]. He has also proposed funding for 500,000 vehicle charging stations by 2030. Today, less than 1% of vehicles on the road are powered by electricity.

Yet, there’s reason to fear California will fail to meet this challenge. Energy Innovations, a San Francisco-based research firm used its Energy Policy Simulator, an open-source modeling tool, to determine whether California is on track to meet its 2030 target. Researchers concluded the state would fall short under current policies, reducing economy-wide emissions from 424 million metric tons in 2017 to around 284 million in 2030. [Ref: 3.2.129]

California, once a leader in environmental issues, is falling behind according to the Climate Center, a nonprofit, started by Ann Hancock

BW1-26  
(cont.)

and Mike Sandler in 2001, with a focus on influencing local government to prioritize the reduction of greenhouse gas emissions. The Climate Center states: “Doing nothing or pursuing timid climate solutions will cost California trillions of dollars in destructive impacts to our economy, public health, equity, and way of life. Bold policy changes now are critical to the pursuit of effective, equitable solutions.” [Ref: 3.2.130]

## 2. BCHD shows a lack of *leadership* in regard to reducing GHG emissions

Some State leaders are committed to reducing the environmental impacts of greenhouses gas emissions. But others are idle, content to let others shoulder the responsibility of meeting state and federal climate action plans.

Unfortunately, it appears BCHD is one of the others -- despite being a *health district*, whose purpose is to ensure the health and well-being of beach city residents.

In the DEIR for the HLC, BCHD shows a severe lack of leadership that is contrary to their stated mission.

## 3. BCHD shows a lack of *empathy* with the communities it is supposed to serve.

BW1-27

Since starting the HLC procurement process, BCHD has also shown a *disregard* for the concerns the public has brought to their attention as evidenced by the HLC project summarized in the DEIR.

The fact that the BCHD is open to endangering the surrounding neighborhoods to the environmental impacts of 5+ years of construction (despite the identified impacts) and has willfully proposed a facility that is wildly incompatible with the surrounding residential neighborhood, shows a dangerous disregard for the goals and objectives the DEIR is premised upon.

BW1-27  
(cont.)

Considering the global impacts of climate change and the radical changes brought on by the Covid-19 pandemic, it's time to make the changes needed to transform and protect future generations. Beach city residents deserve an enlightened BCHD committed to environmental sustainability. The youth of the beach cities deserve more from those who are elected to serve the community, everyone expects more from those who run for public office.

4. BCHD does not adequately address CEQA requirements for reduction of GHG emissions.

DEIR page 439 (3.7-1) states: "With regard to climate change, it is generally accepted that while the overall magnitude of global impacts is substantial, the contribution of any individual development project is so small that direct project-specific significant impacts – albeit not cumulatively significant impacts – are highly unlikely.

BW1-28

"Global climate change is also fundamentally different from other types of air quality impact analyses under CEQA in which the impacts are all measured within, and are linked to, a discrete region (i.e., air basin). Instead, a climate change analysis must be considered on a global level and requires consideration of GHG emissions from the project under consideration as well as the extent of the related displacement, translocation, and redistribution of GHG emissions."

*Thirteen* pages later into the section boilerplate, on page 451 (3.7-13), the DEIR finally identifies *one* regulation they are compelled to follow by quoting from the AQMD regulations:

"As of the present date, the only regulation adopted by the SCAQMD addressing the generation of GHG emissions is the establishment of a 10,000 MT CO<sub>2</sub>e per year screening level threshold of significance for stationary/source/industrial projects for which the SCAQMD is the lead agency."

On page 463 (3.7-25), the BCHD admits the Project will add to GHG emissions, “The proposed Project would result in *net* GHG operational emissions directly from on-road mobile vehicles, electricity, and natural gas.” (emphasis added)

And on page 464 (3.7-26), the DEIR describes some of the specific causes for its GHG emissions, “Operation of the proposed Project would generate GHG emissions from on-site operations such as natural gas combustion for heating/cooking, landscaping equipment and the use of consumer products. GHG emissions would also be generated by vehicle trips associated with the proposed Project.”

BW1-28  
(cont.)

BCHD lists the GHG data on page 469 (3.7-29) in Table 3.7-6 titled Combined Annual Operational GHG Emissions for the Proposed Project. The analysis states that “Pursuant to *current* SCAQMD methodology, the combination of amortized construction GHG emissions with operational GHG emissions would result in a combined total of approximately 13,131.4 MT CO<sub>2</sub>e/year.” (emphasis added). Note that this amount exceeds the SCAQMD annual threshold.

DEIR page 106 (1-6) lists proposed mitigation measures that require approval. The HLC project is listed as requiring SCAQMD approval.

However, the BCHD avoids its obligation to mitigate GHG emissions almost entirely. By failing to fully analyze alternatives and propose vigorous mitigation methods, the DEIR therefore violates CEQA requirements. It is deeply concerning that the BCHD is not looking to reduce the Project GHG emissions to the maximum extent possible.

5. BCHD *must* elect to apply a proactive approach, but does not.

BW1-29

a. BCHD could, *if desired*, require all new vehicles purchased to run on electricity. They could specify the number of electric-vehicle charging stations that will be present on the site. They could extend the bike path

into the project site. They could increase the use of solar panels and onsite appliances to electricity to the maximum amount possible.

BW1-29  
(cont.)

However, DEIR page 402 (3.5-22) merely states: “The natural gas demand for the project would *increase* existing natural gas demand during both Phase 1 and Phase 2.” (emphasis added)

b. Why, therefore, is there no analysis between the electric demand and usage and the natural gas demand and usage? Why is there no discussion of the pros and cons of relying on natural gas?

Clearly, HLC project GHG mitigations are not fully analyzed.

BW1-30

c. DEIR page 465 (3.7-27), under the heading: On-site Use of Natural Gas and Other Fuels, states: “Natural gas would be used by the proposed Project for heating of the Assisted Living and Memory Care units and for the restaurant and dining uses, resulting in a direct release of GHGs.” It also states: “the proposed Project would generate a small percentage of its own energy using photovoltaic solar panels that would cover between 25 and 50% of the proposed roof space.”

Why is there a *factor of two* difference between these two percentages?

The DEIR provides very little information to understand how the mitigation works and how it would impact future GHG emissions. More information *must* be provided in the EIR.

BW1-31

DEIR page 468 (3.7-30) in Table 3.7-7 states: “the *net* annual GHG emissions associated with the proposed Project were calculated by subtracting the existing annual GHG emissions associated with the Beach Cities Health Center and Beach Cities Advanced Imaging Building on-site (refer to Table 3.7-3) from the total GHG emissions associated with the proposed Project (refer to Table 3.7-6).” (emphasis added)



BW1-31  
(cont.)

This section, in essence, makes it obvious that the BCHD is not going to do *anything* with regards to fuels and electricity and will rely on *reductions* that other more conscientious agencies may achieve.

The DEIR does not exhibit the tight, evidentiary connection required by CEQA. It is not consistent with California's GHG reduction programs. The BCHD appears content to do *little* to reduce GHG emissions.

BW1-32

DEIR page 470 (3.7-32) paradoxically states, as shown in Table 3.7-6 and 3.7-7: "the proposed Project would result in a net reduction in total annual GHG emissions when compared to existing annual GHG emissions generated at the Project site. As such, the proposed Project would not generate GHG emissions that may have a significant impact on the environment."

If this rational is accepted by the BCHD Board of Directors, it will mean that future developers who demolish and rebuild on the same site could use a baseline of the existing GHG and avoid having *to reduce GHG emissions at all*.

## 6. The bike path design impacts have not been analyzed.

DEIR page 749 (3.14-71) fails to state why the bike path isn't extended into the project site.

BW1-33

Appendix J, section 2.2 page 15, Existing Pedestrian and Bicycle Facilities, states: "The nearest existing bicycle access to the Project site is provided via the Class II bicycle lanes on Diamond Street and Beryl Street, but there are no existing facilities which provide *direct access*" (emphasis added).

The South Bay Bicycle Master Plan, however, indicates that additional Class I, II, and III facilities are needed throughout the study area.

Rather than use the opportunity of increasing bike travel to and from the HLC project, BCHD chooses to ignore its importance in reducing GHG emissions.

The DEIR fails to address a safe way to bike to and from the existing routes to the interior campus bike facilities. The problem is documented in the Fehr & Peers report showing the intersection counts into the BCHD site along Prospect Ave. that leads into the site. These numbers also show that bike riders are not riding to the site.

BW1-33  
(cont.)

Inexplicably, there is no mention of the potential of providing bike path access to and from the HLC. Instead, the DEIR fails to explain how the project site helps to accomplish the objective of Goal G13: Link existing and proposed bicycle facilities specified in the Redondo Beach General Plan Transportation and Circulation Element presented on DEIR page 454 (3.7-16). Doing so will have a positive impact on GHG emissions. This possibility *must* be analyzed in the EIR.

Though not designated, Flagler Alley currently serves as an informal bicycle path. The proposed Project should include extending the bike lanes into the site, to encourage active transportation to and from the Project site, and thereby reduce GHG production.

#### 7. Impacts on other civic activities are not sufficiently analyzed.

DEIR page 476 (3.7-38) shows that the Redondo Beach General Plan and Climate Action Plan Consistency Summary states the objective is to “Establish a Local Farmer’s Market – Work with local organizations to establish farmers’ markets in the community.”

BW1-34

The DEIR states that the proposed Project would include a tree-lined promenade (also referred to as Main Street), which could support such outdoor farmers’ markets.

This is a questionable service that BCHD is assuming it needs to provide. There are no supporting facts to determine if the public has a need for an additional farmer's market at the Project.

BW1-34  
(cont.)

If there is an unmet need for another farmer's market, the existing parking lot is large enough to accommodate it. Why hasn't the Board used it for that purpose in more than 20 years?

This item *must* be stricken from the DEIR. It doesn't belong there. There is no data to determine the number of vehicles entering and exiting the site and no detailed study to determine its GHG impacts.

## 8. The lack of defined actions continues for Phase 2

a. DEIR page 477 (3.14-39) continues this see-no-evil, speak-no-evil approach. There we are told that the Phase 2 Aquatic Center trip generation estimates were *not completed* by the team hired to conduct the analysis, so instead the DEIR would merely use preliminary findings.

BW1-35

How is this consistent with CEQA requirements? How is this consistent with the pronouncements that analyses performed now will be sufficient for phase 2? How can BCHD possibly claim that all relevant CEQA analyses for Phase 2 have been conducted in the EIR, when in fact, they have not?

The proper analyses *must* be provided in the HLC project EIR

b. DEIR page 757 (3.14-39) states in part: "Trip generation estimates for new uses were based on *available* programming information provided by BCHD. ITE does not provide a trip generation rate for aquatic centers such as the one proposed as part of the Phase 2 development program. Therefore, BCHD hired Ballard King & Associates to prepare a market feasibility study, which includes *preliminary* findings of the market

assessment used by Fehr & Peers to estimate potential trip generation (see Appendix J).” (emphasis added)

What are these details? How did BCHD acquire them? What do they say?

c. The Phase 2 analysis in the DEIR is built with a bag of hot potatoes. It is hard to ascertain accurately who ended up holding it, but the story goes something like the following:

i. Fehr & Peers was given the responsibility by BCHD to estimate Phase 2 potential trip generation.

ii. However, ITE, the original traffic analysis contractor, did *not* provide a trip generation rate for aquatic centers such as the one proposed as part of the Phase 2 development program.

This is important to have been done, however. As DEIR page 854 (5-8) states: “...following the development under Phase 2, the proposed project would result in an increase in daily trip generation associated with the Aquatics Center ...”

iii So, as DEIR page 757 (3.14-39) states: “BCHD then hired Ballard King & Associates to prepare a market *feasibility* study which included preliminary findings of a market *assessment*.” (emphasis added)

The firm’s profile [Ref: 3.2.131] states: “Ballard King offers a broad range of services that can be integrated into a design team or contracted independently. Some of our services include feasibility studies, operations analysis, maintenance cost estimates, revenue projections, staffing levels, budgeting, marketing plans, and third-party design review. Additionally, we perform audits for existing facilities as well as recreation master plans.”

BW1-35  
(cont.)

In response to the BCHD request for proposals for the Aquatic Center feasibility assessment, Ballard King stated on its website, “The scope of worked included: market assessment, public participation, facility recommendations, and operational planning.”

iv. Just to be clear, Ballard King was *not* hired to conduct an engineering-based traffic analysis. They do not claim to be qualified to do so! The methodology used by Ballard King is stated clearly in DEIR Appendix J – Appendix C: pages 67-8 (J-66-7).

v. Evidently, the plan was for Ballard King to use data provided by the South Bay Aquatics Center (SBAQ), located in Redondo Beach, in conjunction with their market assessment to develop aquatic center trip generation estimates.

BW1-36

However, SBAQ had not been operating with regular class schedules recently due to COVID-19. Vehicle counts were unable to be collected. No reliable data was available for validating the trip generation estimates.

DEIR Appendix C of Appendix J, page 41 (J-40) includes the memorandum prepared by SBAQ that states this fact. On DEIR Appendix C of Appendix J, page 67 (J-66) Ballard King states that there was not a sufficient sample size that could be used as “reliable” counts.

BW1-37

vi. Evidently, in BCHD’s rush to get the DEIR published rapidly, no matter what, Ballard King was then directed to use another engineering light-weight - the National Sporting Goods Association (NSGA) [Ref: 3.2.132]

The NSGA approximates the number of people in a geographic area who might participate in recreational activities like swimming, be it in a pool or the ocean.

The NSGA conducts annual surveys of how Americans spend their leisure time. In particular they collect data by age range (7 and up), median household income, and region of the country. Using the age distribution of the primary service area, combined with median household income, region of the country, and national average, Ballard King produces a participation percentage unique to the characteristics of the primary service area.

An explanation of the methodology used by the NSGA to generate their 2017 data set [Ref: 3.2.133] states: “An online panel maintained by Survey Sampling International (SSI) was used. The panel is balanced on a number of characteristics determined to be key indicators of general *purchase behavior*, including household size and composition, household income, age of household head, region, and market size. Due to the online methodology African Americans and Hispanics are somewhat underrepresented in the sample.” (Emphasis added.)

The NSGA information made no claims it could be used to determine the transportation impacts of the Aquatic Center’s GHG emissions.

For the BCHD service area used by NSGA, this equates to an average of 16.6% of the beach city population that participate in swimming. The NSGA does not further define swimming, nor do they define if this is pool use, ocean, lake, etc.

Ballard King takes a 16.6% figure provided by NSGA and applies it to the population of the primary service area that is age 7 and up. It turns out that within the primary service area 86,145 individuals, age 7 and up, participate in swimming.”

Such an approach as the one described here does *not* produce the factual data CEQA *requires* for analysis. The regional data is not a specific factual survey of Beach city households. The Aquatic Center trip generation table is not representative of the methodology used by Fehr & Peers.

Where are the local data sets showing NSGA conducted a data-based study on the Project area?

BCHD has not eliminated or substantially lessened all significant effects on the environment because it has not provided the information required to determine a believable mitigation measure.

Fehr & Peers, by their own admission, make it abundantly clear that the data was not available to them and that they can't provide the *CEQA required* level analysis that must be made to justify the determination that an environmental impact with or without a mitigation is less than significant.

BW1-37  
(cont.)

vii. As a result, the traffic estimates in the DEIR for Phase 2 are general, low-quality *estimates* – certainly not sufficient for the purposes of CEQA.

An EIR cannot merely lie behind the excuse that data is not available. It *must* be provided and the appropriate analyses then made.

As things stand now, BCHD has not eliminated or substantially lessened significant effects on the environment where feasible because it has not provided the information required to determine a feasible mitigation measure. [See: 2.3.4]

Conclusion: The EIR *must* provide analyses with enough substance to access accurately the impact of the HLC on GHG emissions



CEQA Section Title(s): Cumulative Impacts  
CEQA Paragraph(s): 15130, 15355

The CEQA Statutes and Guidelines states in part:

Under Section 15130(a) that an EIR shall “discuss the cumulative impacts of a project when the project’s incremental effect is cumulatively considerable.”

CEQA requires under Section 15130(b) that when the combined cumulative impact associated with the project’s incremental effect and the effects of other projects is not significant, the EIR shall briefly indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR. A lead agency shall identify facts and analysis supporting the lead agency’s conclusion that the cumulative impact is less than significant.

The importance of the section on Cumulative Impacts when drafting an EIR is echoed by Ms. Nicole Hoeksma Gordon and Mr. Albert Herson, Attorneys, Sohagi Law Group in an article published September 2011. They caution that the cumulative impacts section of the EIR is critical yet often prepared as an afterthought.

BW1-38

Ref. 1: [006-1109-Demystifying-CEQAs-Cumulative-Impact-Analysis.pdf](http://006-1109-Demystifying-CEQAs-Cumulative-Impact-Analysis.pdf)  
([mktngsolutions.com](http://mktngsolutions.com))

As the authors explain, "CEQA does not excuse an EIR from evaluating cumulative impacts simply because the project-specific analysis determined its impacts would be less than significant." Adding, “A conclusion that the cumulative impact is not significant must be accompanied by relevant facts and analysis. [Guidelines § 15130(a)(2)].

Attorneys Gordon and Herson, summarize the CEQA requirement saying, “In other words, CEQA does not excuse an EIR from evaluating cumulative impacts simply because the project-specific analysis determined its impacts would be less than significant.”

The March 2021 document called the “Draft Environmental Impact Report for the Beach Cities Health District Healthy Living Campus Master Plan” (herein “DEIR”), that the Beach Cities Health District (herein “BCHD”) has released to address the environmental impacts of their massive development plan (the “Project”) regarding the Project’s cumulative impacts falls victim to this fatal flaw.

It paints an incomplete picture of the environmental impacts of the project and consequently must be augmented and recirculated.

The DEIR in Section 3.0 Environmental Impact Analysis and Mitigation Measures, page 3.0.5 states in part that the Project's cumulative effects were examined using the List Method (Note: Tables 3.0-1, 3.0-2, 3.0-3, and 3.0- 4) lists pending, approved, and recently completed projects within cities of Redondo Beach, Torrance, Hermosa Beach, and Manhattan Beach within 3 miles of the Project site.

Although the DEIR is required to look at the full effect of other projects in the area, it fails to do so. The relevant facts and analysis of the Redondo Beach Police Department Shooting Range Upgrade project is not stated. The DEIR gives the distance between the two sites in section 3.8 Hazards and Hazardous Materials on page 38 but the necessary facts and analysis to determine the cumulative effect was less than significant is not disclosed. The analysis is essential to determine the impact that these projects will have on Towers Elementary school and the residential units between the two properties. As stated in the DEIR, the Project site is surrounded by single- and multi-family residences to the north, south, east, and west. The nearest single-family residences to the Project are located within West Torrance across from Flagler Lane and Flagler Alley, approximately 80 feet east of the Project site. The distance between the Project and the Redondo Beach Police Department Shooting Range is listed on page 3.8.38 to be one mile. Google maps estimates the distance as 650 feet.

Ref. 2: [Google Maps](#)

The City of Redondo Beach project description says,

“This project will continue the design and environmental preparations necessary to install a modular shooting range at the site of the current police shooting range located at the City Parks Yard on Beryl St and determine the environmental site preparation necessary to pursue construction at the site.”

Ref. 3: [AB21-7-80 7 CAPITAL IMPROVEMENT PUBLIC FACILITIES PROJECTS \(opengov.com\)](#)

The supporting facts and analysis is missing. It is not possible to determine the significance of an impact without factual data.

The cumulative impact of several other significant projects surrounding the site is also missing and makes this section of the analysis of the environmental impacts of the cumulative impacts listed in the DEIR less than reliable. The BCHD Board of

BW1-38  
(cont.)

Directors needs to address these impacts before taking further action on the DEIR and concluding cumulative impacts are less than significant.

Under Section 3.1, Aesthetics and Visual Resources, page 3.1.73, the DEIR tells us,

BW1-39

“the nearest cumulative projects to the Project site are the Dominguez Park improvements and Redondo Beach Police Department Shooting Range Upgrade.”

Yet, the DEIR fails to identify most of the associated cumulative impacts including, but not limited to, aesthetics, light, future noise impacts, transportation impacts, and public service impacts. It states,

“all new projects in the vicinity would be required to adhere to regulations of the RBMC or TMC and would be required to undergo plan review by the respective City Planning Commission and City Council.”

BW1-40

The cumulative impacts list does not even mention the BCHD Bike Path Project. And yet, the BCHD received a \$1.8M grant for this project from the LACMTA and is scheduled to start construction in 2021. Until recently, the Bike Path Project was featured in documents the BCHD presented to the public as an integral part of the Project. It was listed under the Project budget in the Financial reports the District has released for successive years. There is an undeniable connection between the two projects. The Bike Path parcel is identified in the Phase 1 (May 2019) and Phase II (February 2020), Environmental Site Assessment Reports prepared for the BCHD by Converse Consultants as Parcel 3 where it is stated on page 16 of the Phase 1 Assessment and on page 7 of the Phase II Assessment that BCHD plans to purchase the property for its Project.

Ref. 4: [Appendix G-Phase I & II ESA.pdf \(bchdfiles.com\)](#)

The Bike Path project is not just adjacent to the east side of the Project, the Bike Path is a BCHD Project that is identified in the NOP for the Healthy Living Campus.

“Additional pedestrian and bicycle improvements would include the construction of internal pedestrian pathways and the potential establishment of a Class I, two-way bicycle path with a pedestrian and lighting improvements along Flagler Alley between Flagler Lane and Diamond Street, immediately east of the campus.”

Ref. 5:

[https://files.ceqanet.opr.ca.gov/252676-2/attachment/ZZ5NTK\\_Z9BX9StrtoelnCsuR078E9aEQTEzdLs-jlpnp-FG5wlziNdLSBcHQNZCIYSvZWY09A3D9PP9i0](https://files.ceqanet.opr.ca.gov/252676-2/attachment/ZZ5NTK_Z9BX9StrtoelnCsuR078E9aEQTEzdLs-jlpnp-FG5wlziNdLSBcHQNZCIYSvZWY09A3D9PP9i0)

That the Bike Project isn't considered for the cumulative analysis is disconcerting. The impacts of the entire project, not just individual segments, must be analyzed. CEQA forbids "piecemealing". Pursuant to CEQA, the whole of the entire project must be analyzed, and those environmental considerations related to project(s) broken down into little projects, thus reducing or minimizing the potential impacts to the environment through "piecemeal" is prohibited. An agency cannot treat one integrated large project as a succession of smaller projects to avoid analyzing the environmental impacts of a whole project.

Ref. 6: [Citizens Assn. For Sensible Development of Bishop Area v. County of Inyo \(1985\) :: California Court of Appeal Decisions :: California Case Law :: California Law :: US Law :: Justia](#)

The Project drawings showing the bike path crossing the Flagler Lane driveways may also create a public safety hazard and it also must be studied. The purpose of CEQA is to analyze physical impacts to the existing environment at the time of the NOP (CEQA Guidelines Section 15125(a)), not to hypothetical future conditions.

Furthermore, in combination with mitigation measure MM T-3, page 3.14.67 the roadway along Beryl Avenue as presented, may have inadequate sight lines to ensure service vehicles turning on to Flagler Lane will have adequate views of the bicycles and pedestrians on Flagler Lane and the vehicles entering the roadway from the drop off exit proposed by the BCHD for the Project.

The combination of multiple driveways adjacent to the Project on Flagler Lane may also result in the creation of inadequate sight lines to ensure drivers exiting the driveways have adequate views of oncoming bicycles and pedestrians. The BCHD Project, unlike some other projects, seeks to add commercial vehicles and transit vans to what is a residentially zoned roadway. The typical application where a bike path crosses multiple driveways is along mostly multi-family residential developments.

Ref. 7: [Google Maps](#)

As noted in the DEIR, this conflicts with the Torrance Municipal Code (TMC) Section 92.30.8 zoning of the street as noted in Section 5.0 Alternatives, page 6.

On multiple occasions BCHD has stated it is working with the cities of Redondo Beach and Torrance to secure the required approvals to start work on the Bike Path Project as BCHD's Senior Policy Analyst reported to the MTA on 7/29/2020 and as documented in emails to city of Torrance staff.

Ref. 8: Email to Torrance from Murdock.

This is further evidence the BCHD is aware of the project and coordinating the Bike Path design and construction. That the two Projects are one and the same is made obvious by examining the reports the LACMTA requires BCHD submit as part of their grant. The Invoice dated 28 July 20 shows multiple expenditures to Ed Almanza and Associates and to Paul Murdoch Architects. Each company is working for the BCHD on the Healthy Living Campus. The two projects are deliberately "piecemealed" to minimize the cumulative impacts to avoid CEQA compliance.

Ref. 9: LACMTA FA Measure M Attachment D-2, Quarterly Progress\Expense Report, Section 4, Itemized Expenses.

The requirement to identify facts and analysis supporting the lead agency's conclusion that the cumulative impact is less than significant has been ignored. The analysis of the Bike Path Project in the DEIR is more often misleading and only addressed as an afterthought. However, the DEIR analysis does disclose a few more contradictions.

In Section 3.14 Transportation Consistency with Circulation Plans, Ordinances, and Policies, page. 3.14.70, after stating there are several additions and extensions to surrounding bicycle lanes under design or approved for construction within the cities of Redondo Beach, Torrance, and Hermosa Beach, the BCHD tells us,

"it 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."

**Note: The parenthetical notation identified above is noted in the EIR.**

"The expansion of the regional bikeway network in the cities of Redondo Beach, Torrance, and Hermosa Beach would achieve the overall goal of the South Bay Bicycle Master Plan and would align with BCHD's mission to promote health and well-being. As such, the proposed Project would not result in a substantial

BW1-40  
(cont.)

contribution to cumulatively considerable impacts related to transportation plans and policies.”

Here the BCHD acknowledges there is a Bike Path Project, but purposely states it is separate from the Project. They fail to disclose it was a key part of their Project and covered in the NOP. Yet the DEIR provides no facts to analyze the construction-related traffic, the operational uses proposed for Flagler Lane, the safety impacts, or future impacts on public services that the bike lane imposes on the Project, as is required by CEQA.

The BCHD, who secured \$1.8M from the MTA for the project, admits the Bike Path Project has been discussed with the BCHD Board of Directors and the Community Working group since 2017. It says there have been 60 meetings to the community on the bike path and the Project. The Bike Path has always been a part of the Project. Why is it now excluded? Where is the data needed to assess its environmental impacts? The omission of the BCHD Bike Path Project from the DEIR paints an incomplete picture of the environmental impacts of the project and it must be augmented and recirculated.

BW1-40  
(cont.)

The BCHD also fails to connect the Bike Path to the future Project site. Is this a further subterfuge? Section 3 of the D-2 Quarterly Report states the Bike Path project will start construction work 6/1/2021 and end on 3/30/2022. The two Project schedules overlap. Yet the BCHD also fails to propose any policies to improve access to pedestrian, bicycle, and transit systems or to reduce trip generation through transportation demand management consistent with the intent of SB 74.

In renderings and engineering diagrams produced by Paul Murdock Architects, the bike lane is depicted as running from Beryl and Flagler Lane through Flagler Alley to Diamond to Prospect where it stops at a traffic light. It is not shown how it will extend to the Project site. The location of the bike lane as identified in the DEIR does not reflect the full scope of improvements recommended in the South Bay Bicycle Master Plan. As such, it appears to not even achieve the intended result of reducing traffic and GHG at the site.

Ref. 10: [Redondo Beach Bike Master Plan | South Bay Bicycle Coalition](#)

Can a stable and finite EIR fail to address such a significant project in the Cumulative Impacts Section and still meet the CEQA requirements?



The DEIR also simply assumes the impact that the Bike Path Project, in addition to the 157 RCFE units, PACE program and other future BCHD services, will not impact police and fire services when the Project is completed. However, the possibility for significant unmitigated impacts clearly remains. The DEIR states on page 3.13.18

“the proposed Project, in combination with past, present, and reasonably foreseeable probable future projects in Redondo Beach (refer to Table 3.0-1 in Section 3.0, Cumulative Impacts) could contribute to an incremental increase in demand for fire protection services.”

Yet, the DEIR fails to analyze the potential environmental effects of this not yet defined mitigation. The Southern California Association of Governments (SCAG) projections for growth in housing units and population (SCAG 2020) (refer to Section 3.12, Population and Housing) is described on, page 3.13.18. Yet the nexus is not explained. However, all expansions of BCHD facilities, as well as the surrounding projects in the list, must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial.

The DEIR does not adequately disclose, evaluate and mitigate how these project impacts identified under Cumulative Impacts will be addressed as required by CEQA or explained the determination that the impacts are less than significant with mitigations as stated in the DEIR. Yet, the DEIR says in part on page 3.13.24

“Cumulative Impacts As described in Impact PS-2, the proposed Project – including the preliminary site development plan under Phase 1 and the development program under Phase 2 – could recreate an incremental increase in demand for law enforcement services provided by RBPD related to theft, trespassing, or vandalism. Therefore, the proposed Project, in combination with past, present, and reasonably foreseeable probable future projects in Redondo Beach (refer to Table 3.0-1 in Section 3.0, Cumulative Impacts) could contribute to an incremental increase in demand for law enforcement services.”

Again, the BCHD acknowledges the impact is significant yet the analysis and facts to determine how it was mitigated is missing from the text and clearly the impacts remain. The DEIR again fails to analyze the potential environmental effects of this not yet defined mitigation.



BW1-40  
(cont.)

The preparation and consideration of the cumulative impacts has been relegated to an afterthought. The DEIR does not analyze the cumulative impacts as required. As defined in CEQA Guidelines Section 15355, a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the DEIR together with other foreseeable projects causing related impacts in the vicinity of the project.

Ref. 11: [Microsoft Word - 4.0 Basis for Cumulative Analysis.doc \(ca.gov\)](#)

The DEIR does not research or provide data to explain its determination of the Cumulative Impact of the Project, the Redondo Beach Police Department Shooting Range and the Dominguez Dog park on the two historic resources triangulated between these three sites. The other projects will generate peak hour trips therefore cumulative impacts need to be analyzed and included in the DEIR.

BW1-41

The DEIR does not consider the cumulative impacts on the Redondo Beach Historical Museum, 302 Flagler Lane, and the Morrell House next to it. Located adjacent to the corner of Beryl and Flagler Lane, the Museum, known locally as the 1904 Queen Anne House, houses an extensive collection of Redondo Beach artifacts, memorabilia, photographs, and historic documents including locally excavated Native American artifacts. According to the City website, the Museum receives thousands of annual visitors and school groups. It meets the CEQA definition of a historic resource, but the environmental impacts of the Project on the two buildings have not been researched. The DEIR ignores the fact that impacts on “historic resources” are viewed as environmental impacts.

The DEIR fails to consider the cumulative impact the construction related noise, traffic and dust from the three referenced projects will have on the Morrell House. The Morrell House was designated as a local landmark in February of 1991. The view of the Palos Verdes ridge to the south east of the property is visible from the porch of the house. The DEIR does not say the view will be obscured by the height of the Project. The DEIR does not say what the interior noise level will be within these structures as described under Title 24 of the California Building Standards Code, page 3.11.13, Noise.

Ref. 12:

[https://www.redondo.org/depts/recreation/cultural\\_arts/rb\\_historical\\_museum/default.asp](https://www.redondo.org/depts/recreation/cultural_arts/rb_historical_museum/default.asp)

Historical resources are considered part of the environment and a project that may cause a substantial adverse effect on the significance of a historical resource is a project that may have a significant effect on the environment. The definition of "historical resources" is contained in Section 15064.5 of the CEQA Guidelines.

Inexplicably, Table 3.4-1. Historic Architectural Resources within Redondo Beach and Table 3.11-5. Noise-Sensitive Land Uses within 1,000 Feet of the Project Site use different figures when dismissing impacts the Project(s) will have on Morrell House and Queen Anne House at Dominguez Park. Table 3.11.-5 says the distance of the structures from the site is 600 feet. Table 3.4-1 says the distance from the Project site is 650 and 750 feet, respectively. On page 3.11.27 the DEIR states

“The Morrell House and Queen Anne House at Dominguez Park are located approximately 600 feet north of the Project site (refer to Table 3.11- 6; Section 3.4, Cultural Resources and Tribal Cultural Resources).

BW1-41  
(cont.)

A Google Search shows the distance from the Project(s) site is less than 500 feet.

Ref. 13: [Google Maps](#)

The DEIR is flawed, and these mistakes and inconsistencies must be addressed and remedied. On page 3.13.24 the DEIR concludes,

“neither the Phase 1 preliminary site development plan nor the Phase 2 development program would result in substantial contributions to cumulatively considerable impacts due to new or physically altered law enforcement facilities within Redondo Beach.”

There is nothing to support that this conclusion is accurate. There is no analysis of the RBPD remodeling project identified on the List of nearby projects. Although the BCHD spent more than \$4M to date on the Project to determine if it is environmentally defensible, the necessary data to determine the full extent of the cumulative impacts is missing.

BW1-42

The List fails to mention the planned development of the 51 acre AES site, 1100 North Harbor Drive, Redondo Beach, under Cumulative Impacts. The DEIR refers to the site only under Alternatives, Section 5, pages 10 - 11.

Yet before the DEIR was released, the City of Redondo Beach announced it is going to court to force the AES site to close per State law.

Ref. 14: Easy Reader Update, September 17, 2020.

[Redondo Beach AES power plant shutdown deferred to 2021, or later - Easy Reader News](#)

These two large developments are one mile apart. As per dates indicated on Appendix I-Noise Modeling Results, the BCHD Project will start construction 2/11/2022 and end 12/25/2026. There is no data to determine any further future noise impacts for the Phase 2 Development Program. It is not possible to determine the longer-term impacts of the Project. Yet in the DEIR, page ES-3 it says,

“These impacts were determined through a rigorous process mandated by CEQA in which existing conditions are compared and contrasted with conditions that would exist once the project is implemented.”

Then, on page RG-1 the DEIR clearly states,

“Phase 2 would be developed approximately 5 years after the completion of Phase 1.”

BW1-42  
(cont.)

If so, that is not the period of time noted in the Noise Modeling Results. It compares the conditions that would exist for the dates noted. The DEIR does not meet the definition of a stable and finite project description.

Ref. 15: Appendix I-Noise Modeling Results (10/27/2020), page 72.

<https://www.bchdfiles.com/docs/hlc/Appendix%20I-Noise%20Modeling%20Results.pdf>

The DEIR states under Alternatives, Section 5, page 11 that the AES site,

“was removed from consideration due to the incompatible zoning (P-GP) at the site.”

The DEIR did not state the AES site is not available. It is still scheduled to be shut down and replaced. The development of the AES site will coincide with the construction of the Project. The Cumulative Impacts Section cannot exclude facts and avoid analysis of the AES development. The Project(s) together and along with other listed projects must be examined to determine the overall environmental impacts and the information must be shared with the public. This has not been done and cannot be done without further study.

The DEIR also fails to say how BCHD staff assigned to the proposed 31,300-sf Aquatic Center pool will be properly trained in life saving procedures or to show why the addition of a quasi-public pool will not create a significant impact on local emergency services. The DEIR fails to show that the addition of a pool will not burden EMS and public safety personnel trained in CPR and emergency procedures as required by the California Code of Regulations, Division 9, Prehospital Medical Services. section 100018. Authorized Skills for Public Safety, First Aid Providers. They have not provided any data to determine what the specific impact that a massive pool will have on city and county personnel or provided mitigation measures in the event emergency services are overwhelmed with the additional duties that will be required to properly and legally ensure public safety.

Ref. 16:

[EMSA Chapter 1.5 First-Aid-CPR-Standards-and-Training-for-Public-Safety-Personnel.pdf \(ca.gov\)](#)

[§ 100015. Application and Scope., Article 2. General Training Provisions, Chapter 1.5. First Aid Standards for Public Safety Personnel, Division 9. Prehospital Emergency Medical Services, Title 22. Social Security, California Code of Regulations \(elaws.us\)](#)

The DEIR fails to address any of the unique public safety requirements that must be followed to address construction-related impacts that need to be addressed in order to build a public swimming pool as identified within the California Building Code.

Ref. 17:

[2016 California Building Code, Part 2, Volume 2 - CHAPTER 33 \(iccsafe.org\)](#)

[Codes Display Text \(ca.gov\)](#)

[California Swimming Pool Requirements](#)

Swimming and other water-related activities are known to cause injuries and illness, including:

- **Drowning.** Drowning is a leading cause of unintentional injury-related death for children ages 1–14 years. Non-fatal drowning can cause brain damage resulting in learning disabilities or even permanent loss of basic functioning.

- **Injuries and emergency department (ED) visits.** Injuries linked to pool chemicals accounted for 3,000–5,000 emergency department visits each year. Almost half of the patients are under 18 years of age.
- **Waterborne illness outbreaks.** Nearly 500 disease outbreaks linked to pools, hot tubs/spas, and water playgrounds occurred from 2000 to 2014. The leading cause of these outbreaks is *Cryptosporidium*. This parasite is chlorine tolerant and can cause outbreaks that sicken thousands.
- **Public pool and hot tub/spa closings because of public health hazards.** A recent study found that 11.8% (1 out of 8) of public pool and 15.1% (1 out of 7) of public hot tub/spa inspections resulted in immediate closure because of at least one identified violation that represented a serious threat to public health.

Ref. 18: [General Information | Model Aquatic Health Code | CDC](#)

The BCHD is proposing to add a public service that the Health District is not authorized by LAFCO to provide and that carries great risks. Where is the analysis to show that these services are within the BCHD scope of services? The staffing, funding and expertise to ensure the operation of a community pool has not been identified in the published Project Pillars and the six BCHD Project Objectives. However, the risks associated with operating a large aquatic center are well documented.

- Almost 1 in 8 (12.1% or 13,532 of 111,487) routine pool inspections conducted during 2008 identified serious violations that threatened public health and safety and resulted in an immediate closure <sup>4</sup>.
- More than 1 in 10 (10.7% or 12,917 of 120,975) routine pool inspections identified pool disinfectant level violations. Chlorine and other pool disinfectants are the primary barrier to the spread of germs in the water in which we swim <sup>4</sup>.
- About half (56.8%) of spas are in violation of local environmental health ordinances, and about 1 in 9 spas require immediate closure (11%) <sup>6</sup>.

Ref. 19: [Publications, Data, & Statistics | Healthy Swimming | Healthy Water | CDC](#)

There is also no analysis of the Phase 2 pool on RBFD services or other city services. The required analysis to explain the reason for a mitigation has not been included or was not analyzed. This is a significant omission. The environmental

BW1-43  
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impacts on city services should be analyzed before the BCHD Board can consider the DEIR as feasible as defined by CEQA § 21061.1.

BW1-44

The Cumulative Section of the DEIR for the Project is insufficient. It provides an inaccurate and incomplete picture of the potential environmental impacts of the proposed project. Concurrency with the Bike Path Project is not analyzed as required. Concurrency with emergency services is not analyzed. Concurrency with the impacts of the construction on the Redondo Beach Historical Society buildings adjacent to the site is not analyzed. The DEIR must be augmented and recirculated to address these specific errors prior to the DEIR being brought before the BCHD Board to be certified. A stable finite project description cannot be made until the detail of these other impacts are determined and finalized. The Project is not feasible as defined by CEQA § 21061.1.

*The BCHD EIR for the Project fails to identify facts and analysis supporting the lead agency's conclusion that the cumulative impacts are less than significant. The relevant facts and analysis [Guidelines § 15130(a)(2)] required by CEQA have not been determined.*

CEQA Section Title(s): § 21000, 21074, 21082.3(d) Guidelines

CEQA Paragraph(s): n/a

Link to the DEIR: Section: 3.4 Cultural Resources and Tribal Cultural Resources

The California Environmental Quality Act (CEQA) (Division 13 (commencing with § 21000) of the Public Resources Code) recognizes the unique history of California Native American tribes and upholds existing rights of all California Native American tribes to participate in, and contribute their knowledge to, the environmental review process.

Section § 21074 of the Public Resources Code states in part that “tribal cultural resources” are: (1) sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a tribe that are listed, or determined to be eligible for listing, in the national or state register of historical resources, or listed in a local register of historic resources.

BW1-45

Pub. Resources Code § 21082.3, subd. (d)(1) states, “Environmental documents for a project with a significant impact on an identified tribal cultural resource cannot be certified until consultation, if initiated, has concluded. Consultation is concluded when: • Parties reach mutual agreement concerning appropriate measures for preservation or mitigation; or • Either party, acting in good faith or after reasonable effort, concludes that mutual agreement cannot be reached concerning appropriate measures of preservation or mitigation.”

Ref. 1: [Laws, Local Ordinances & Codes – California Native American Heritage Commission](#)

Section 3.4 Cultural Resources and Tribal Cultural Resources of the Project DEIR, page 29 states in part: “the Gabrieleño Band of Mission Indians – Kizh Nation advised that the Project site is an area of high cultural sensitivity because of the presence of traditional trade routes. Higher elevations, such as the site of the BCHD campus, may have served as look-out locations. Maps shared by the tribe illustrate the probable alignment of a traditional trade route (now the Hermosa Greenbelt and former railroad right-of-way). Trade routes were heavily used by the tribe for movement of trade items, visiting family, going to ceremonies, accessing recreation areas, and accessing foraging areas. As such, these areas can contain seasonal or permanent ramadas or trade depots, seasonal and permanent habitation areas, and isolated burials and cremations. Watercourses and water bodies within the region may have also supported seasonal or permanent settlements, seasonal or



permanent trade depots, ceremonial and religious prayer sites, and burials and cremation sites.” Additionally, Section RG, page 12 says, “The fact that the BCHD campus has been previously graded and developed does not entirely rule out the possibility of buried resources being present, and potentially uncovered, during ground disturbance associated with the proposed redevelopment.”

Ref. 2: [Appendix D-Cultural Resources Technical Studies.pdf \(bchdfiles.com\)](#)

BW1-45  
(cont.)

Conclusion: A qualified professional archaeologist and approved Native American monitor shall be retained for the duration of ground-disturbing activities. If “tribal cultural resources” are identified, CEQA requires the discussion of confidential sacred site locations, burial locations, and tribal practices to continue until the parties reach mutual agreement concerning appropriate measures for preservation or mitigation of the resources. The NHAC encourages agencies to think of how you would want your spiritual beliefs and practices respected and act accordingly. The NHAC advises agencies to understand that tribes don’t want to be persuaded to accept your preconceived plans; they want to be involved in the planning. Tribal consultation is not an “accommodation” to a tribe; it’s the law.

CEQA Section Title(s): § 15124(b) Guidelines

CEQA Paragraph(s): n/a

Link to the DEIR: Section: 2.0 Project Description

Section of the CEQA Statutes and/or Guidelines state in part:

Per CEQA Guidelines Section 15124(b) (14 California Code of Regulations [CCR] Section 15000 et seq.) the description of the project in the Environmental Impact Report (EIR) is to include “[a] statement of objectives sought by the proposed project.”

Section 2.0 PROJECT DESCRIPTION of the DEIR, page 22 states in part:

In 2005, BCHD created a data-driven strategic planning process to prioritize funding and program implementation. The strategic plan calls for a community needs assessment and the cultivation of **strategic partnerships** to enable BCHD to address critical health needs for its service population. The Strategic Plan established these priorities: • Provide all residents with enhanced health services of demonstrated effectiveness ranging from prevention and education to intervention. • Improve the capacity of the BCHD and its partners to assess and respond to individual and environmental factors that affect community health. • Further BCHD standing as a trusted and valued community health resource. (Emphasis added.)

Section 2.4.3, Project Objectives, states, BCHD developed three major “Project Pillars,” which were presented to the Board of Directors during a public meeting on June 17, 2020. The Project Objectives are based on these three Project Pillars: Health • Build a center of excellence focusing on wellness, prevention, and research. • Leverage the campus to expand community health programs and services. Livability • Focus on emerging technologies, innovation, and accessibility. • Create an intergenerational hub of well-being, using Blue Zones Project principles. Community • Actively engage the community and **pursue partnerships**. • Grow a continuum of programs, services, and facilities to help older adults age in their community. (Emphasis added.)

The BCHD goes on to say it will transfer 80% of the site to a private developer(s). As described in Section 2.0, Project Description, page 29. **The 157 Assisted Living units, which would be operated by a partner company specializing in**

**administering Assisted Living programs**, would occupy Floors 1 through 6 of the proposed RCFE Building. (Emphasis added.)

On Page 30 the DEIR says in part: The proposed PACE services would be a new program on the BCHD campus. The proposed Project RCFE Building would dedicate approximately 14,000 sf of floor area for PACE, to be developed in consultation with and **operated by a partner company specializing in PACE services**. (Emphasis added.)

The particular action proposed by the BCHD for the Project is a violation of Article 2, Section 32121. As such, BCHD fails to initiate a Service Review and Sphere of Influence study as required by the County of Los Angeles Local Agency Formulation Commission (LALAFCO). **ARTICLE 2. Powers 32121 says in part,**

Each local district shall have and may exercise the following powers:

2) To transfer, for the benefit of the communities served by the district, in the absence of adequate consideration, any part of the assets of the district, including, without limitation, real property, equipment, and other fixed assets, current assets, and cash, relating to the operation of the district's health care facilities to one or more nonprofit corporations to operate and maintain the assets.

(C) Before the district transfers, pursuant to this paragraph, 50 percent or more of the district's assets to one or more nonprofit corporations, in sum or by increment, the elected board shall, by resolution, submit to the voters of the district a measure proposing the transfer. The resolution shall identify the asset proposed to be transferred, its appraised fair market value, and the full consideration that the district is to receive in exchange for the transfer. The appraisal shall be performed by an independent consultant with expertise in methods of appraisal and valuation and in accordance with applicable governmental and industry standards for appraisal and valuation within the six months preceding the date on which the district approves the resolution. The measure shall be placed on the ballot of a special election held upon the request of the district or the ballot of the next regularly scheduled election occurring at least 88 days after the resolution of the board. If a majority of the voters voting on the measure vote in its favor, the transfer shall be approved. The campaign disclosure requirements applicable to local measures provided under Chapter 4 (commencing with Section 84100) of Title 9 of the Government Code shall apply to this election.

The DEIR ignores this requirement. For the BCHD Board of Directors to proceed with the proposed Project, the BCHD must initiate a Municipal Service Review (“MSR”) and Sphere of Influence (“SOI”) analysis with LALAFCO. It cannot make the decision to proceed with changing its SOI without authorization of LALAFCO.

Furthermore, per **Assembly Bill No. 2698**, The Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 ensures BCHD does not attempt to provide municipal services outside their jurisdictional boundaries. All jurisdictional changes, such as incorporations, annexations, and detachments, must be consistent with the affected agency’s Sphere of Influence.

Additionally, Section **56375 paragraphs (a) and (g) says in part:**

The commission shall have all of the following powers and duties subject to any limitations upon its jurisdiction set forth in this part:

(a) (1) To review and approve with or without amendment, wholly, partially, or conditionally, or disapprove proposals for changes of organization or reorganization, consistent with written policies, procedures, and guidelines adopted by the commission.

(g) On or before January 1, 2008, and every five years thereafter, the commission shall, as necessary, review and update each sphere of influence.

Conclusion: The BCHD has not followed the rules outlined in Section 56375. LALAFCO did not review the goals and objectives. In the last five years BCHD has not had a service review but BCHD did undertake the Project, they have spent more than \$8M of tax payer funds on Project studies, they have discussed the Project with elected officials and the public and they could have initiated the conversation with LALAFCO well ahead of the release of the DEIR. But in fact, they ignored their responsibility to ask for permission to proceed as required by law. The BCHD must abide by the LALAFCO regulations. They should not be allowed to proceed to consider approving the DEIR and should discontinue further development of the Project until they initiate the required service review with LALAFCO.

Ref. 1 [Bill Text - AB-2698 Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000.](#)

[South Bay Report\\_Final.doc \(lalafco.org\)](#)

BW1-46  
(cont.)

CEQA § 15002. GENERAL CONCEPTS (a) Basic Purposes of CEQA, states in part: The basic purposes of CEQA are to: (1) Inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities. (2) Identify the ways that environmental damage can be avoided or significantly reduced. (3) Prevent significant, avoidable damage to the environment by requiring changes in projects using alternatives or mitigation measures when the governmental agency finds the changes to be feasible.

The DEIR Project Description, page 2.37 states, “The proposed Project design for the electrical distribution system includes a SCE Substation Yard, medium voltage distribution system, and generator yard, which would be located along the eastern perimeter of the Project site (refer to Figure 2-5 and Figure 2-7). Ref. 1: Map of Project and Electrical Yard

BW1-47



DEIR Map of  
Electrical Yard and Ga

There is, however, insufficient information about the substation as stated in the BCHD’s Project DEIR to determine how it will impact the environment. How was the location of the SCE electrical substation determined? What is the setback from the street? Were other locations considered? What are the dimensions of the substation? The trenching required for the utilities work to provide connections between the SCE Substation Yard and generator yard is not sufficiently explained. The nearest residences have not been identified but appear to be less than 100 feet away from the work site. There aren’t any stated measures to mitigate the harmful environmental impacts that the soil remediation and trenching will require as described on page 3.8.26 of the DEIR. CEQA requires either to identify an alternative location for the substation or to describe the mitigation measures that will be implemented to safeguard the public.

The impacts of the substation location on biological resources are not discussed except to note, “construction under Phase 1 would require removal of an additional 20 landscaped trees along Diamond Street to provide space for the SCE Substation Yard.” (page 3.3.18). APPENDIX C, BIOLOGICAL RESOURCES TECHNICAL STUDIES by Hamilton Biological, Inc. dated 2019 shows the site for the substation is the same location where the biologist identified an Allen’s hummingbird nest. The report recommends that there be a 30 foot buffer around the area to protect the nesting birds. These environmental impacts are not addressed.

BW1-48

## Ref. 2: Hamilton Biological Assessment



Location of nesting  
hummingbirds p. 6 Bi

BW1-48  
(cont.)

The Substation location also creates a conflict with RBMC Section 10-1.707 Trees (b). RBMC section 10-1.707 Trees (b) is designed to protect trees. Why select a site on the property that is heavily landscaped when there are suitable sites that avoid the impacts to trees and plants? The DEIR plans for the substation should be reassessed and another location should be selected.

Instead of a substation here, why couldn't there be an accommodation for access to the planned bike facilities?

## 3.2 References

Sec #	Ref #	Reference Link	Note
2.7.3	3.2.1	<a href="https://www.bchd.org/eir">https://www.bchd.org/eir</a>	click on eir
2.7.3	3.2.2	<a href="https://legistarweb-production.s3.amazonaws.com/uploads/attachment/pdf/600728/CEO_Report_-_May_22nd_2020_Final.pdf">https://legistarweb-production.s3.amazonaws.com/uploads/attachment/pdf/600728/CEO_Report_-_May_22nd_2020_Final.pdf</a>	pg. 1 paragraph 1 and pg. 2 paragraph 1
2.7.3	3.2.3	<a href="http://blogs.dailybreeze.com/history/2015/12/05/beach-cities-dont-take-no-for-an-answer-in-bid-to-create-south-bay-hospital/">http://blogs.dailybreeze.com/history/2015/12/05/beach-cities-dont-take-no-for-an-answer-in-bid-to-create-south-bay-hospital/</a>	
2.7.3	3.2.4	<a href="https://www.bchd.org/evolution-bchd">https://www.bchd.org/evolution-bchd</a>	
2.7.3	3.2.5	Reserved	
2.7.3 and 2.8.3	3.2.6	<a href="https://www.bchdfiles.com/docs/bchd/finance/BCHD%20FY19-20%20BUDGET.pdf">https://www.bchdfiles.com/docs/bchd/finance/BCHD%20FY19-20%20BUDGET.pdf</a>	.pdf pg. 33 or doc pg. 31
2.7.3	3.2.7	<a href="https://www.bchdcampus.org/sites/default/files/archive-files/June%202017.pdf">https://www.bchdcampus.org/sites/default/files/archive-files/June%202017.pdf</a>	.pdf pg 3 or doc page 1
2.7.3	3.2.8	<a href="https://www.bchdcampus.org/sites/default/files/archive-files/December%202019.pdf">https://www.bchdcampus.org/sites/default/files/archive-files/December%202019.pdf</a>	pg. 14
2.7.3	3.2.9	<a href="https://www.bchdcampus.org/sites/default/files/archive-files/June%202017.pdf">https://www.bchdcampus.org/sites/default/files/archive-files/June%202017.pdf</a>	.pdf pg. 12 or doc pg. 3
2.7.3	3.2.10	<a href="https://fb.watch/5f02EAtlj5/">https://fb.watch/5f02EAtlj5/</a>	
2.7.2	3.2.11	<a href="https://www.bchdcampus.org/sites/default/files/archive-files/Cain%20Borthers_Financial%20Analysis_2020.pdf">https://www.bchdcampus.org/sites/default/files/archive-files/Cain%20Borthers_Financial%20Analysis_2020.pdf</a>	Download. Scroll down to Project Materials. Select Market-Feasibility-Studies-2019.pdf. Go to pg 6 or .pdf pg. 5
2.7.2	3.2.12	<a href="https://www.bchdcampus.org/campus">https://www.bchdcampus.org/campus</a>	
2.7.2	3.2.13	<a href="https://www.bchdcampus.org/sites/default/files/archive-files/Cain%20Borthers_Financial%20Analysis_2020.pdf">https://www.bchdcampus.org/sites/default/files/archive-files/Cain%20Borthers_Financial%20Analysis_2020.pdf</a>	.pdf pg. 22 or doc pg. 4
2.7.2	3.2.14	<a href="https://www.mcknightsseniorliving.com/home/news/nic-assisted-living-occupancy-rate-strongest-in-2-years-at-85-7-in-fourth-quarter">https://www.mcknightsseniorliving.com/home/news/nic-assisted-living-occupancy-rate-strongest-in-2-years-at-85-7-in-fourth-quarter</a>	
2.7.2	3.2.15	<a href="https://www.bchdcampus.org/sites/default/files/archive-files/Cain%20Borthers_Financial%20Analysis_2020.pdf">https://www.bchdcampus.org/sites/default/files/archive-files/Cain%20Borthers_Financial%20Analysis_2020.pdf</a>	.pdf pg. 5 or doc .pg 3
2.8.4	3.2.16	<a href="https://www.builddriteconstruction.com/9-reasons-construction-projects-fail/">https://www.builddriteconstruction.com/9-reasons-construction-projects-fail/</a>	
2.8.4	3.2.17	<a href="https://news.gallup.com/businessjournal/152429/cost-bad-project-management.aspx">https://news.gallup.com/businessjournal/152429/cost-bad-project-management.aspx</a>	
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2.7.1	3.2.20	<a href="https://legistarweb-production.s3.amazonaws.com/uploads/attachment/pdf/436542/2._CEO_Report_-_September_17th__2019.pdf">https://legistarweb-production.s3.amazonaws.com/uploads/attachment/pdf/436542/2._CEO_Report_-_September_17th__2019.pdf</a>	pg. 17 scroll down to Community Working Group Presentations. Click on January 2018.
2.7.1	3.2.21	<a href="https://bchdcampus.org/communityworkinggroup">https://bchdcampus.org/communityworkinggroup</a>	pgs. 2 and 6
2.7.1	3.2.22	<a href="https://bchd.granicus.com/DocumentViewer.php?file=bchd_6fc4c20c8e71ecec9dfccde1a8ad7c90.pdf&amp;view=1">https://bchd.granicus.com/DocumentViewer.php?file=bchd_6fc4c20c8e71ecec9dfccde1a8ad7c90.pdf&amp;view=1</a>	pg. 3-4 has cost summary
2.7.1	3.2.23	<a href="https://easyreadernews.com/redondo-beach-residents-eye-healthy-living-campus-plans/">https://easyreadernews.com/redondo-beach-residents-eye-healthy-living-campus-plans/</a>	
2.5.2 and 2.5.3	3.2.24	<a href="https://www.bchdfiles.com/docs/bchd/finance/BCHD%20FY19-20%20BUDGET.pdf">https://www.bchdfiles.com/docs/bchd/finance/BCHD%20FY19-20%20BUDGET.pdf</a>	.pdf pg. 52 or print 50
2.5.2 and 2.5.3	3.2.25	<a href="https://www.bchd.org/docs/financial/BCHD-Budget-2009-2010.pdf">https://www.bchd.org/docs/financial/BCHD-Budget-2009-2010.pdf</a>	.pdf pg. 25 or print 17
2.5.3	3.2.26	<a href="https://www.bchdfiles.com/docs/bchd/finance/BCHD%20FY19-20%20BUDGET.pdf">https://www.bchdfiles.com/docs/bchd/finance/BCHD%20FY19-20%20BUDGET.pdf</a>	.pdf pg. 38 or print 36
2.5.3	3.2.27	<a href="https://www.bchdfiles.com/docs/bchd/finance/BCHD%20FY19-20%20BUDGET.pdf">https://www.bchdfiles.com/docs/bchd/finance/BCHD%20FY19-20%20BUDGET.pdf</a>	.pdf pg. 38 or print 36
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2.4.2, 2.8.4	3.2.30	<a href="https://www.bchdcampus.org/sites/default/files/archive-files/Cain%20Borthers_Financial%20Analysis_2020.pdf">https://www.bchdcampus.org/sites/default/files/archive-files/Cain%20Borthers_Financial%20Analysis_2020.pdf</a>	.pdf pg 5 or print 3
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2.2.1	3.2.78	<a href="https://www.bchd.org/operating-budgets">https://www.bchd.org/operating-budgets</a>	Click on Fiscal Year 2020-2021 .pdf pg 25, print pg 23
2.2.4	3.2.79	<a href="https://www.dailybreeze.com/2020/06/16/beach-cities-health-district-to-cut-healthy-living-campus-revamp-by-160-million/">https://www.dailybreeze.com/2020/06/16/beach-cities-health-district-to-cut-healthy-living-campus-revamp-by-160-million/</a>	Click on 2021/02/24 Board of Director Meeting Agenda. Go to bottom of page 15.
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2.8.2	3.2.82	<a href="https://www.bchd.org/healthpolicy">https://www.bchd.org/healthpolicy</a>	Click on Adopted the Beach Cities Livability Plan
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2.6.1	3.2.98	<a href="https://www.google.com/maps/@33.8530896,-118.3798613,16.05z">https://www.google.com/maps/@33.8530896,-118.3798613,16.05z</a>	
2.6.1	3.2.99	<a href="https://southbaybicyclecoalition.org/resources/existing-routes-and-plans/redondo-beach-bike-master-plan/">https://southbaybicyclecoalition.org/resources/existing-routes-and-plans/redondo-beach-bike-master-plan/</a>	
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Sec #	Ref #	Reference Link	Note
2.6.1	3.2.101	<a href="https://stories.opengov.com/redondobeachca/published/01SPexN-x">https://stories.opengov.com/redondobeachca/published/01SPexN-x</a>	
2.6.1	3.2.102	<a href="https://easyreadernews.com/redondo-beach-aes-power-plant-shutdown-deferred-to-2021-or-later/">https://easyreadernews.com/redondo-beach-aes-power-plant-shutdown-deferred-to-2021-or-later/</a>	
2.6.1	3.2.103	<a href="https://www.redondo.org/depts/recreation/cultural_arts/rb_historical_museum/default.asp">https://www.redondo.org/depts/recreation/cultural_arts/rb_historical_museum/default.asp</a>	
2.6.1	3.2.104	<a href="https://www.cdph.ca.gov/Programs/CEH/DRSEM/Pages/EMB/RecreationalHealth/California-Swimming-Pool-Requirements.aspx">https://www.cdph.ca.gov/Programs/CEH/DRSEM/Pages/EMB/RecreationalHealth/California-Swimming-Pool-Requirements.aspx</a>	
2.6.1	3.2.105	<a href="https://www.cdc.gov/healthywater/swimming/swimmers/rwi.html">https://www.cdc.gov/healthywater/swimming/swimmers/rwi.html</a>	
2.6.1	3.2.106	<a href="https://www.cdc.gov/healthywater/swimming/publications.html#four">https://www.cdc.gov/healthywater/swimming/publications.html#four</a>	
2.6.1	3.2.107	<a href="https://www.cdc.gov/healthywater/swimming/publications.html#six">https://www.cdc.gov/healthywater/swimming/publications.html#six</a>	
2.6.1 and 2.10.3	3.2.108	<a href="https://files.ceqanet.opr.ca.gov/252676-2/attachment/ZZ5NTK_Z9BX9StrtoelnCsuR078E9aEQTEzdLs-jIpnP-FG5wlzjNdLSBcHQNzCIYSvZWY09A3D9PP9i0">https://files.ceqanet.opr.ca.gov/252676-2/attachment/ZZ5NTK_Z9BX9StrtoelnCsuR078E9aEQTEzdLs-jIpnP-FG5wlzjNdLSBcHQNzCIYSvZWY09A3D9PP9i0</a>	pg.24
2.8.3	3.2.109	<a href="https://bchdcampus.org/campus">https://bchdcampus.org/campus</a>	scroll halfway down the webpage
2.2.3	3.2.110	<a href="https://www.bchd.org/%E2%80%98silver-tsunami%E2%80%99-headed-toward-beach-cities">https://www.bchd.org/%E2%80%98silver-tsunami%E2%80%99-headed-toward-beach-cities</a>	
2.2.3	3.2.111	<a href="https://www.npr.org/2017/12/12/570248798/village-movement-allows-elderly-to-age-in-their-homes">https://www.npr.org/2017/12/12/570248798/village-movement-allows-elderly-to-age-in-their-homes</a>	
2.3.3	3.2.112	Chepesiuk R. Decibel hell: the effects of living in a noisy world. Environ Health Perspect. 2005;113(1):A34-A41. doi:10.1289/ehp.113-a34	
2.3.3	3.2.113	ISO 11690-2:2020 Acoustics — Recommended practice for the design of low-noise workplaces containing machinery — Part 2: Noise control measures	
2.3.3	3.2.114	Kwon, Nahyun & Park, Moonseo & Lee, Hyun-Soo & Ahn, Joseph & Shin, Mingyu. (2016). Construction Noise Management Using Active Noise Control Techniques. Journal of Construction Engineering and Management. 142. 04016014. 10.1061/(ASCE)CO.1943-7862.0001121	Look in your Download folder
2.3.3	3.2.115	Hansen, Colin & Goelzer, Berenice. (1996). Engineering Noise Control. Journal of The Acoustical Society of America - J ACOUST SOC AMER. 100.	
2.3.3	3.2.116	Carter, Amy Elizabeth, "DESIGN OF PARTIAL ENCLOSURES FOR ACOUSTICAL APPLICATIONS" (2006). University of Kentucky Master's Theses. 356. <a href="https://uknowledge.uky.edu/gradschool_theses/356">https://uknowledge.uky.edu/gradschool_theses/356</a>	Look in your Download folder



Sec #	Ref #	Reference Link	Note
2.8.1	3.2.117	<a href="https://www.bchdcampus.org/sites/default/files/archive-files/Market-Feasability-Study_2019_0.pdf">https://www.bchdcampus.org/sites/default/files/archive-files/Market-Feasability-Study_2019_0.pdf</a>	
2.8.1	3.2.118	<a href="https://seniorhousingnews.com/2020/10/15/senior-housing-occupancy-falls-to-another-record-low-in-q3/">https://seniorhousingnews.com/2020/10/15/senior-housing-occupancy-falls-to-another-record-low-in-q3/</a>	
2.8.1	3.2.119	<a href="https://homehealthcarenews.com/2020/07/biden-announces-775b-plan-to-boost-the-caregiver-economy-support-in-home-care-providers/">https://homehealthcarenews.com/2020/07/biden-announces-775b-plan-to-boost-the-caregiver-economy-support-in-home-care-providers/</a>	
2.3.2	3.2.120	<a href="http://usa.chinadaily.com.cn/china/2013-10/28/content_17061997.htm">http://usa.chinadaily.com.cn/china/2013-10/28/content_17061997.htm</a>	
2.3.2	3.2.121	<a href="http://iee-sf.com/expert-witness-services/index.html">http://iee-sf.com/expert-witness-services/index.html</a>	
2.15.2	3.2.122	<a href="https://global.ctbuh.org/resources/papers/download/2100-when-buildings-attack-their-neighbors-strategies-for-protecting-against-death-rays.pdf">https://global.ctbuh.org/resources/papers/download/2100-when-buildings-attack-their-neighbors-strategies-for-protecting-against-death-rays.pdf</a>	
2.15.2	3.2.123	<a href="http://www.greenrooftechnology.com/green-roof-blog/reflecting-surfaces-an-environmental-nightmare">http://www.greenrooftechnology.com/green-roof-blog/reflecting-surfaces-an-environmental-nightmare</a>	
2.5.4	3.2.124	<a href="https://www.bchd.org/committee-meetings">https://www.bchd.org/committee-meetings</a>	Select Strategic Planning Committee 2021 , then January 13, 2021, then Presentation. Look in Downloads and go to pg. 11
2.5.4	3.2.125	<a href="https://www.dailybreeze.com/2021/04/20/public-review-begins-for-manhattan-beachs-first-senior-living-facility/">https://www.dailybreeze.com/2021/04/20/public-review-begins-for-manhattan-beachs-first-senior-living-facility/</a>	
2.15.2	3.2.126	<a href="https://global.ctbuh.org/resources/papers/download/2100-when-buildings-attack-their-neighbors-strategies-for-protecting-against-death-rays.pdf">https://global.ctbuh.org/resources/papers/download/2100-when-buildings-attack-their-neighbors-strategies-for-protecting-against-death-rays.pdf</a>	
2.3.5	3.2.127	<a href="https://caselaw.findlaw.com/ca-supreme-court/1867838.html">https://caselaw.findlaw.com/ca-supreme-court/1867838.html</a>	
2.3.5	3.2.128	<a href="https://www.latimes.com/opinion/story/2021-04-22/biden-carbon-goal-climate-change-summit">https://www.latimes.com/opinion/story/2021-04-22/biden-carbon-goal-climate-change-summit</a>	
2.3.5	3.2.129	<a href="https://energyinnovation.org/">https://energyinnovation.org/</a>	
2.3.5	3.2.130	<a href="https://theclimateteam.org/">https://theclimateteam.org/</a>	
2.3.5	3.2.131	<a href="https://ballardking.com/firm-profile/">https://ballardking.com/firm-profile/</a>	
2.3.5	3.2.132	<a href="https://www.nsga.org/research/nsga-research-offerings">https://www.nsga.org/research/nsga-research-offerings</a>	
2.3.5	3.2.133	<a href="https://www.nsga.org/globalassets/products/product-images/single-sport-participation-2017-edition---example.pdf">https://www.nsga.org/globalassets/products/product-images/single-sport-participation-2017-edition---example.pdf</a>	
2.3.5	3.2.134	reserved	
2.4.4	3.2.135	<a href="http://lalafco.org/wp-content/uploads/documents/msr/South%20Bay%20Final%20MSR.pdf">http://lalafco.org/wp-content/uploads/documents/msr/South%20Bay%20Final%20MSR.pdf</a>	
2.4.4	3.2.136	<a href="https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201120120AB2698">https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201120120AB2698</a>	
2.9.1	3.2.137	<a href="https://www.cancer.org/cancer/cancer-causes/diesel-exhaust-and-cancer.html">https://www.cancer.org/cancer/cancer-causes/diesel-exhaust-and-cancer.html</a>	
2.4.3	3.2.138	<a href="https://digitalcommons.law.ggu.edu/do/search/?q=ceqa%20design%20build&amp;start=0&amp;context=1436324&amp;facet=">https://digitalcommons.law.ggu.edu/do/search/?q=ceqa%20design%20build&amp;start=0&amp;context=1436324&amp;facet=</a>	Select Volume 2, Issue 2, Article 2

Sec #	Ref #	Reference Link	Note
2.4.3	3.2.139	<a href="https://www.bchd.org/board-directors-meetings">https://www.bchd.org/board-directors-meetings</a>	Select 2021/4/28 and then Agenda for download. Go to page 60
2.5.5	3.2.140	<a href="https://votersedge.org/ca/en/election/2020-11-03/alameda-county/washington-township-health-care-district/measure/measure-xx">https://votersedge.org/ca/en/election/2020-11-03/alameda-county/washington-township-health-care-district/measure/measure-xx</a> ].	
	3.2.141	reserved	
2.5.5	3.2.142	<a href="https://legistarweb-production.s3.amazonaws.com/uploads/attachment/pdf/900306/1._BOD_Memo_-_Cain_Brothers_RCFE_Partner_Selection_042321.pdf">https://legistarweb-production.s3.amazonaws.com/uploads/attachment/pdf/900306/1._BOD_Memo_-_Cain_Brothers_RCFE_Partner_Selection_042321.pdf</a>	
2.2.2	3.2.143	<a href="https://www.bchdcampus.org/sites/default/files/archive-files/December-2019-Presentation_CWG.pdf">https://www.bchdcampus.org/sites/default/files/archive-files/December-2019-Presentation_CWG.pdf</a>	Look in download folder
2.12.2	3.2.144	<a href="https://www.ncbi.nlm.nih.gov/books/NBK232733/">https://www.ncbi.nlm.nih.gov/books/NBK232733/</a>	
2.12.2	3.2.145	<a href="https://psc.wi.gov/Documents/Brochures/Impacts%20of%20Substations.pdf">https://psc.wi.gov/Documents/Brochures/Impacts%20of%20Substations.pdf</a>	
2.7.4	3.2.146	<a href="https://www.bchdcampus.org/campus">https://www.bchdcampus.org/campus</a>	
2.7.4	3.2.147	<a href="https://bchd.granicus.com/player/clip/427?view_id=2&amp;redirect=true">https://bchd.granicus.com/player/clip/427?view_id=2&amp;redirect=true</a>	Go to the Budget Page Number listed in the text for each year.
2.7.3	3.2.148	<a href="https://www.bchd.org/docs/financial/BCHD-Budget-2010-2011.pdf">https://www.bchd.org/docs/financial/BCHD-Budget-2010-2011.pdf</a>	Go to the Budget Page Number listed in the text for each year.
2.7.3	3.2.149	<a href="https://www.bchd.org/docs/financial/BCHD-Budget-2011-2012.pdf">https://www.bchd.org/docs/financial/BCHD-Budget-2011-2012.pdf</a>	Go to the Budget Page Number listed in the text for each year.
2.7.3	3.2.150	<a href="https://www.bchd.org/docs/financial/BCHD-Budget-2012-2013.pdf">https://www.bchd.org/docs/financial/BCHD-Budget-2012-2013.pdf</a>	Go to the Budget Page Number listed in the text for each year.
2.7.3	3.2.151	<a href="https://www.bchd.org/docs/financial/BCHD-Budget-2013-2014.pdf">https://www.bchd.org/docs/financial/BCHD-Budget-2013-2014.pdf</a>	Go to the Budget Page Number listed in the text for each year.
2.7.3	3.2.152	<a href="https://www.bchd.org/docs/financial/BCHD-Budget-2014-2015.pdf">https://www.bchd.org/docs/financial/BCHD-Budget-2014-2015.pdf</a>	Go to the Budget Page Number listed in the text for each year.
2.7.3	3.2.153	<a href="https://www.bchd.org/docs/financial/BCHD-Budget-2015-2016.pdf">https://www.bchd.org/docs/financial/BCHD-Budget-2015-2016.pdf</a>	Go to the Budget Page Number listed in the text for each year.
2.7.3	3.2.154	<a href="https://www.bchd.org/docs/financial/BCHD-Budget-2016-2017.pdf">https://www.bchd.org/docs/financial/BCHD-Budget-2016-2017.pdf</a>	Go to the Budget Page Number listed in the text for each year.
2.7.3	3.2.154	<a href="https://www.bchd.org/docs/bchd/FY17-18BCHDBudget.pdf">https://www.bchd.org/docs/bchd/FY17-18BCHDBudget.pdf</a>	Go to the Budget Page Number listed in the text for each year.

Sec #	Ref #	Reference Link	Note
2.7.3	3.2.155	<a href="https://www.bchdfiles.com/docs/bchd/finance/BCHD_FY18-19_Budget-FINAL2.pdf">https://www.bchdfiles.com/docs/bchd/finance/BCHD_FY18-19_Budget-FINAL2.pdf</a>	Go to the Budget Page Number listed in the text for each year.
2.7.3	3.2.156	<a href="https://www.bchdfiles.com/docs/bchd/finance/BCHD%20FY19-20%20BUDGET.pdf">https://www.bchdfiles.com/docs/bchd/finance/BCHD%20FY19-20%20BUDGET.pdf</a>	Go to the Budget Page Number listed in the text for each year.
2.7.3	3.2.157	<a href="https://www.bchdfiles.com/docs/bchd/finance/BCHD%20FY20-21%20Budget%20Final_links2.pdf">https://www.bchdfiles.com/docs/bchd/finance/BCHD%20FY20-21%20Budget%20Final_links2.pdf</a>	Go to the Budget Page Number listed in the text for each year.
2.17.1	3.2.158	AB 52 and Tribal Cultural Resources in CEQA (ca.gov)	
2.17.1	3.2.159	Kizh Nation (gabrielenoindians.net)	
2.17.1	3.2.160	SB-18 Traditional tribal cultural places. (ca.gov)	

## Margallo, Sydney

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:38 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Beach Cities Health District Healthy Living Campus Project, DEIR No. 2019060258 AKA HLC Draft Environmental Impact Report ("DEIR")  
**Attachments:** CEQA 15088.5 Recirculation - Areas of Known Controversy - California Code of Regulations.html; Screenshot 2.0 Project Description Torrance Redondo Border.png; 3.1 Aesthetics Phase 2 environmental analysis is insufficient.png; petitions\_zipped.zip; Torrance CC item 9B\_-\_STAFF\_REPORT - Adopted (2).pdf; Draft City of Redondo Beach Comment Letter on BCHD DEIR 2021-06-08 w highlights.pdf; bchd deir pub comments.docx

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** B W <brianjwolfson@gmail.com>  
**Sent:** Tuesday, June 8, 2021 11:13 AM  
**To:** EIR <eir@bchd.org>  
**Cc:** Bill.brand@redondo.org <Bill.brand@redondo.org>; todd.loewenstein@redondo.org <todd.loewenstein@redondo.org>; nils.nehrenheim@redondo.org <nils.nehrenheim@redondo.org>; christian.horvath@redondo.org <christian.horvath@redondo.org>; laura.emdee@redondo.org <laura.emdee@redondo.org>; zein.obaji@redondo.org <zein.obaji@redondo.org>; eleanor.manzano@redondo.org <eleanor.manzano@redondo.org>; joe.hoefgen@redondo.org <joe.hoefgen@redondo.org>; PFurey@TorranceCA.Gov <PFurey@torranceca.gov>; GChen@TorranceCA.gov <GChen@torranceca.gov>; TGoodrich@TorranceCA.Gov <TGoodrich@torranceca.gov>; MGriffiths@TorranceCA.Gov <MGriffiths@torranceca.gov>; AMattucci@torranceca.gov <AMattucci@torranceca.gov>; HAshcraft@TorranceCA.Gov <HAshcraft@torranceca.gov>; SKalani@TorranceCA.Gov <SKalani@torranceca.gov>; CityClerk@torranceca.gov <CityClerk@torranceca.gov>  
**Subject:** Beach Cities Health District Healthy Living Campus Project, DEIR No. 2019060258 AKA HLC Draft Environmental Impact Report ("DEIR")

**Dear Mr. Meisinger:**

BW2-1 In addition to other comments I have filed, enclosed are some additional general comments (bchd deir pub comments) and several attachments, including CEQA Section 15088.5, regarding why I find the BCHD Project DEIR inadequate and incomplete, and lacking sufficient mitigations to ensure the environmental safety of Torrance and Redondo Beach residents who will suffer most if this project is approved.

Thank You,

Brian Wolfson  
City of Torrance

Nick Meisinger re: Healthy Living Campus  
Wood Environment & Infrastructure Solutions, Inc.  
9177 Sky Park Ct.  
San Diego, CA 92123

Regarding:  
Beach Cities Health District Healthy Living Campus Project, DEIR No.  
2019060258  
AKA HLC  
Draft Environmental Impact Report ("DEIR")

Dear Mr. Meisinger:

BW2-2 In addition to other comments I have filed, enclosed are some additional general comments regarding why I find the DEIR inadequate and incomplete, and lacking sufficient mitigations to ensure the environmental safety of Torrance and Redondo Beach residents who will suffer most if this project is approved.

## 2.0 The Project



The proposed Project calls for the demolition of the existing 5-story, 158,000-sf Beach Cities Health Center and the attached 3,200- sf maintenance building under Phase 1 and a more general long range redevelopment program under Phase 2. The DEIR says Phase 1 will take 29 months to build. Phase 2 will take about 28 months. Construction for each is for 6 days a week.

Phase 1 includes - a 6-story, 203,700-square-foot (sf) Residential Care for the Elderly (RCFE) Building with 157 new Assisted Living units and 60 Memory Care units, 14,000 sf of space for the Program of All-Inclusive Care for the Elderly (PACE), 6,270 sf of space for Community Services, and a 9,100- sf Youth Wellness Center. The proposed RCFE Building would have a height of 103 feet. It will be funded privately.

**BW2-3** Phase 2 – is for a Wellness Pavilion of up to 37,150 sf, an Aquatics Center of up to 31,300 sf (including 24,000 sf of indoor space and 7,300 sf of outdoor space), a Community Health and Fitness Facility of up to 20,000 sf, and a Parking structure with up to 2 subterranean levels and up to 8.5 above ground levels. It is a general outline of what could be built. It is unfunded and the BCHD has no funds to build it.

The project site extends east into the City of Torrance right-of-way by about 26 feet along Flagler Lane between Beryl Street to the north and approximately halfway thru Flagler Alley to the south. See map, page 122 of the DEIR. The Project site is bordered by single-family residences to the east across Flagler Lane and Flagler Alley, in an area zoned R-LO (Low Density Residential) by the City of Torrance (refer to Figure 2-2)

**BW2-4** I live one block away from the site on Tomlee Ave and walk by the property daily. Even with the lower elevation, I can see multiple buildings on the campus including the maintenance building, childcare center, and parking garage. As the DEIR states, the BCHD is not required to upgrade the Beach Cities Health Center or other buildings on the campus for seismic-related structural reasons (DEIR page 140) as they initially claimed. They are primarily committed to redeveloping the site to generate additional revenue as noted in their Project objectives per CEQA.

### 3.1 Aesthetics



BW2-5

The proposed Beach Cities Health District (BCHD) Healthy Living Campus Master Plan (Project) proposed for the site is incompatible based on the regulations, policies, and design guidelines of the City of Redondo Beach and City of Torrance governing aesthetics and visual resources as defined by the California Environmental Quality Act (CEQA). The massive six-story 203,700-square-foot (sf) Residential Care for the Elderly (RCFE) Building with 157 new Assisted Living units and 60 Memory Care units proposed for Phase One is unsuitable for the surrounding neighborhood and inappropriate for the commercial and residential zones that determines what can be built at the site. Its height and mass will far exceed the existing 5-story, 158,000-sf Beach Cities Health Center that it will replace, and the placement of the building will severely alter existing views in all directions.

BW2-6

As stated in the DEIR, the natural environment plays an important role in defining the visual setting in this area. Yet, the DEIR inaccurately describes the visual resources that makes the area unique and fails to recognize that the views leading up to the marina and the Portofino Hotel are noteworthy local landmarks, page 202. As residents know and visitors realize the two defining scenic resources are the view of the skyline and the views of the Palos Verdes Ridgeline seen from all major streets. The expansive view of open sky is a striking visual resource, and an economic asset that affects property values and commerce throughout the area. There are several unique view corridors within the area that extend between streets to provide unfettered views of the bay and sunsets (page 204 of the DEIR shows one) that enhance the natural beauty. Phase 1 would compromise that experience and the views by dominating sightlines and obscuring the natural features of the

Commented [BW1]:



BW2-6  
(cont.)

area. It is so massive and prominent it will also alter the panoramic public views from Wilderness Park and other high points including Palos Verdes. Although these sites are mentioned in the DEIR (page 200) there is no acknowledgement that the public view from these high points are compromised by the Project and there's no analysis of what the environmental impacts would be on aesthetics or other relevant CEQA category like glare. See attached photos. The EIR as presented is incomplete. The impact of the Project on public views must be studied before the BCHD Board of Directors takes action on the final EIR.

Ref: Photo from Wilderness Park, RB of Project site



BW2-7

In Addition, the zoning codes of the cities of Redondo Beach and Torrance clearly prohibit several of the project features including the rooftop patio at Flagler Lane and Beryl and the entrance/exit onto a residential street that has a driveway on a commercial street.

See: attached Public Comments from the Cities of Redondo Beach and City of Torrance.

BW2-8

However, the DEIR is incomplete in numerous other areas that must be studied per CEQA. Page 228 of the DEIR states incorrectly that the Project would not create "direct sight lines into private interior living spaces of nearby residences due to the

BW2-8 (cont.)	distance and high angle of the views” however, the DEIR fails to study the impact the RCFE building will have on the multistory residential units to the north of the site. Most of the rooms within the 203,700-square-foot (sf) Residential Care for the Elderly (RCFE) Building will have direct sight lines into private interior living spaces of these residences. It must be analyzed.
BW2-9	Omissions in the DEIR seem indicative of the Lead Agency’s incompetence or willingness to disregard public input. In my experience they have demonstrated a propensity to mislead residents to get what they want. They have shown a cynicism for the public process and boasted they can use their “political capital” to get the Project approved. As a longtime government employee, if the BCHD is allowed some sort of special treatment it undermines all elected and appointed representatives. The CEQA process must be treated objectively. No individual or agency is above the law.
BW2-10	<p>When the Project site was first developed as a hospital it was surrounded by farmland, oil rigs and a city dump. Over the last 60 years, it has been built out as residential and small scale commercial development. No one who purchased property imagined the public views and aesthetics would be “for sale” or that it could be eliminated with the district’s “political capital.”</p> <p>The misuse of the BCHD’s “political capital” is used even more egregiously to undermine the public’s understanding of Phase Two. As noted in the public comments made by the city of Torrance, the DEIR lacks required details regarding Phase Two. Representative View 1: Tomlee Avenue (Facing West) doesn’t show Phase Two. How is this allowed?</p>
BW2-11	<p>Representative View 2 on page 241 of the DEIR states,</p> <p style="padding-left: 40px;">The Project would substantially reduce access to open sky from this view and would change the visual character of this view from the residences in this West Torrance neighborhood as well as travelers along Flagler Lane and Towers Street. Source: VIZf/x 2021</p> <p>Yet, no mitigation measures are provided to address the impacts as required by CEQA. Representative View 3 on page 242 of the DEIR states, the 6-story RCFE would be,</p> <p style="padding-left: 40px;">“Visually prominent from this location given its location along the northern perimeter of the BCHD campus.”</p>

Again, the impact of Phase Two is not addressed as required by CEQA. Representative View 4 is characterized by the low-rise commercial buildings that comprise the Redondo Village Shopping Center. As stated in the DEIR page 244,

The proposed Project would reduce access to open sky with development of the RCFE Building during implementation of the Phase 1 preliminary site development plan. Source: VIZf/x 2021.

The DEIR fails to provide a mitigation measure for the visual impact on the open sky as required but does acknowledge that the open sky is hidden from view from this location. On page 245, the DEIR caption under the image of the site as it appears today says,

Given the location of the proposed RCFE Building along the northern perimeter of the Project site, the height, bulk, and scale of the proposed development would be greater than the existing development on campus. Therefore, the perceived height of the RCFE Building from the pedestrian perspective would be more pronounced from this location.

Representative View 5: North Prospect Avenue and Central Driveway Intersection (Facing Northeast) again fails to include any of the Phase Two buildings and fails again to provide the public a clear visual aid to properly determine how the Project will alter the visual character of the site.

As presented, only through the erection of PROPER silhouettes will potentially-affected locals learn about the existence and/or massive size of this proposed development and be able to comment should further discussion take place.

Homeowners to the east and north worried that upper-floor RCFE residents will see into their houses and fenced yards will lose their right to privacy without just compensation or due process. Other properties will be covered in shade for hours each day and will lose out on sunlight used to power rooftop solar panels.

Conclusion: MM VIS-1 is flawed. It is subjective and lacks sufficient data to be conclusive. The size and orientation of the Project conflicts with Policy 1.46.5 of the Redondo Beach General Plan. The proposed Project will have a significant visual impact on the area as defined by CEQA. The open sky, Pacific Ocean and Palos Verdes ridge line are recognized aesthetic and visual resources. The BCHD has no authority to alter this view and must be required to provide the necessary visual aids to evaluate Phase Two.

### **Section 3.1, Light Pollution**

The DEIR fails to state if Phase Two of the Project will increase artificial light in the neighborhood. Light pollution compromises health, disrupts ecosystems, and spoils aesthetic environments. It creates an unwarranted and unwelcome intrusion upon residents.

BW2-18

The programmatic Phase Two is insufficient. The DEIR fails to analysis the environmental impacts of Phase Two on aesthetics. The impacts must be determined to inform the public of what the environmental impacts will be as required by CEQA.

### **Section 3.2 Air Pollution**

Phase 1 and 2 with its , 203,700-square-foot (sf) Residential Care for the Elderly (RCFE) Building with 157 new Assisted Living units and 60 Memory Care units, 14,000 sf of space for the Program of All-Inclusive Care for the Elderly (PACE), 6,270 sf of space for Community Services, a 9,100- sf Youth Wellness Center, Wellness Pavilion of up to 37,150 sf, an Aquatics Center of up to 31,300 sf (including 24,000 sf of indoor space and 7,300 sf of outdoor space), a Community Health and Fitness Facility of up to 20,000 sf, and a Parking structure with up to 2 subterranean levels and up to 8.5 above ground levels will significantly increase air, noise, and light pollution. The Air pollution impacts spread fugitive dust from exposed soil surfaces far from the Project site as outlined in the DEIR in tables 3.2.7, 3.2.8 and 3.2.9. Yet, the mitigation measures fail to provide details to ensure how far north of the site the contaminants will go. The shopping center to the north is not even mentioned in Appendix B or addressed in the air quality modeling. How is it that the closest commercial property to the project was ignored? What will be the impacts on the public and the employees? The DEIR admits that fugitive dust will blow throughout the site and beyond in all directions. Yet, the mitigation measures don't provide details on how they will be enforced or if violations will result in fines against the BCHD. What are the legal remedies that the public is entitled to have to ensure their health and safety?

BW2-19

### **Section 3.10 Land Use and Planning**

Table 3.10.5 Policy LU 4.3 Torrance General Plan. This section is noted in the DEIR as no conflict. This should be changed, and the text modified to note that Flagler Lane is a residential street and cannot be used as a commercial roadway per the City of Torrance Muni code. See the attached Public Comments made by the City of Torrance. The Project pickup and drop off location proposed for Flagler Lane must be moved to Beryl and a recirculated DEIR made public. Any additional

BW2-20

**BW2-20 (cont.)** traffic would make the air quality impacts worse, harming humans, pets, and wildlife in the vicinity.

**BW2-21** Table 3.10.5 Policy LU.9.1. This table must be changed to note that the native species proposed for the landscaping have been determined to attract coyotes. The city of Torrance coyote abatement strategy notes that this type of landscaping attracts breeding coyotes and conflicts with the city municipal code and general plan. The DEIR must be changed to reflect this conflict and recirculated.

**BW2-22** Table 3.10.5 Policy LU 11.9. This section needs to be changed from no conflict to conflicts. The DEIR says that the project is within the city of Torrance right-of-way along Flagler. The Project, which will destroy the existing landscaping and mature trees on the hillside, conflicts with the Torrance hillside overlay ordinance. It is not permitted and will cause a significant environmental impact to the residential homes to the east of the site as noted by the Torrance City Council at its public meeting on Tuesday May 25, 2021. The DEIR must be recirculated, and the design plans modified to show the project doesn't impact Flagler Lane or the Torrance

**BW2-23** hillside in any way. The project must be moved west as proposed by both the city of Redondo Beach and City of Torrance. The best Alternative is no-project.

### **Section 3.11 Noise Pollution**

**BW2-24** Apart from the excessive noise generated by the construction and the weekly outdoor events the BCHD is proposing as ongoing public events, the "party patio" atop the two-story PACE structure at the corner of Beryl and Flagler Lane will lead to noise bouncing off the structures to the detriment of Torrance and Redondo Beach residents. The DEIR inexplicably fails to address the environmental impacts of this activity from this location. People who bought their homes knew of the current zoning & general plan, which did not include greatly increasing the number of buildings and square footage of the existing campus. Residents had no reason to expect a high-density high-rise campus or its attendant noise. This development will greatly increase noise as noted in the DEIR and deprive residents of their quiet neighborhoods without adequate compensation or due process of law.

High noise levels can contribute to an increased incidence of coronary artery disease. In animals, noise can increase the risk of death by altering predator or prey detection and avoidance, interfere with reproduction and navigation, and contribute to permanent hearing loss. While the elderly may have cardiac problems due to noise, according to the World Health Organization, children are especially vulnerable to noise, and the effects that noise has on children may be permanent. Noise poses a serious threat to a child's physical and psychological health and may negatively interfere with a child's learning and behavior. The second story outdoor "party patio" must go. The DEIR must then be recirculated.

BW2-24  
(cont.)

The noise from the planned events will permanently change the character of the neighborhood and the mitigation measures to control the operational sound are insufficient and prone to human error.

### Section 3.4 Cultural Resources and Tribal Cultural Resources

To prevent further on-site and off-site impacts to Native American cultural resources, additional mitigation conditioned in the EIR, and future agreements, must include the following: avoid disturbing tribal cultural resources. If 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 mitigation measures proposed in the DEIR on page 3.8.30 of Appendix B create a conflict with the mitigation measures required to ensure that any native American cultural resources are not disturbed and/or removed from the site.

The DEIR states on page 524 that soil cutting during the excavation and installation of soldier piles shall be disposed of off-site with any affected soils from the deep excavation.

BW2-25

To comply with the cultural resource mitigations outlined in the DEIR, the mitigations in the section on Air Quality for excavation and shoring must be stopped. The project set-back should be increased to avoid disturbing tribal cultural resources as required by CEQA, the City of Redondo Beach and the City of Torrance.

The DEIR should be amended and recirculated to state that the site of the Project is Native American land. Andrew Salas of the Gabrieleño Band of Mission Indians – Kizh Nation states that the entire area was once home to a massive native community that numbered in the thousands. Avoiding further damage to the site must be prioritized. Any ground disturbances may cause significant damage to historic artifacts similar to what occurred at the Playa Vista site. In that case, the California Second District Court of Appeal found that the Los Angeles City Council violated the California Environmental Quality Act (CEQA) after it approved an environmental impact report that permitted construction for the development's second phase in 2005.

[9hh663HS5zMVPechbXFXJ89XP1\\_j-ICGJq8NSj3f3qK7bmedi-GlyU-NDifnqge0tosi3UYIkP6Y9MXB0 \(ca.gov\)](#)

Tribe members also say, the “backfilled” soil from earlier excavation often contains the original cultural resources that were disturbed and that these too must be

preserved, protected, and respected as required by the state of California. Historic records show that this area, including the AES site, was frequently used by the Gabrieleño Band of Mission Indians to cure meats and sea foods and for trading with other tribes up and down the inland coast. These cultural resources are more than 10,000 years old. Yet, the DEIR mitigation measures do not acknowledge the significant impact any and all development would cause. Throughout this area ancestral artifacts have been discovered within two feet of the topsoil.

BW2-25  
(cont.)

Conclusion: The mitigation measures need to be modified to avoid desecrating the site. The air quality mitigations conflict with the cultural resources mitigations and must be amended to ensure that any cultural resources are preserved. If the developers ignore its cultural significance, site monitors are an insufficient mitigation measure. Greater mitigations are needed. If artifacts are discovered, the site must be avoided, and all work stopped to determine how to proceed. The Lead Agency must adopt a clear method for reporting concerns, filling complaints, and determining damages for noncompliance.

#### Section 1.8 Areas of Known Public Controversy

BW2-26

CEQA Guidelines Section 15123 states that an EIR shall identify areas of controversy known to the lead agency, including issues raised by public agency as well as interested members of the public.

BW2-27

Section (a) of Section 15123 says the EIR shall contain a summary of the proposed actions and its consequences. The language of the summary should be as clear and simple as reasonably practical. (b) The summary shall identify: (1) Each significant effect with proposed mitigation measures and alternatives that would reduce or avoid that effect; (2) Areas of controversy known to the Lead Agency including issues raised by agencies and the public; and (3) Issues to be resolved including the choice among alternatives and whether or how to mitigate the significant effects.

BW2-29

Although slowed by the Covid Restrictions and quarantine, a petition with more than 1200 signatures from people who oppose the project for multiple reasons including the abuse of the design build/ design bid-build approach normally used for public projects and that the Project is beyond the scope of services the BCHD is authorized to provide was brought to the attention of the district. Upon learning of the protest, the BCHD discounted the public controversy created by the Project and never addressed the concerns as required by CEQA. **PDF copies of the petitions and signatures is attached.** The public controversy concerns must be addressed as required by CEQA and the DEIR recirculated.

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## § 15088.5. Recirculation of an EIR Prior to Certification.

### 14 CA ADC § 15088.5 BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS

Barclays Official California Code of Regulations [Currentness](#)

Title 14. Natural Resources

Division 6. Resources Agency

Chapter 3. Guidelines for Implementation of the California Environmental Quality Act

Article 7. EIR Process

14 CCR § 15088.5

#### § 15088.5. Recirculation of an EIR Prior to Certification.

(a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term “information” can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. “Significant new information” requiring recirculation include, for example, a disclosure showing that:

- (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.
- (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (*Mountain Lion Coalition v. Fish & Game Com.*(1989) 214 Cal.App.3d 1043).

(b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

(c) If the revision is limited to a few chapters or portions of the EIR, the lead agency need only recirculate the chapters or portions that have been modified.

(d) Recirculation of an EIR requires notice pursuant to Section 15087, and consultation pursuant to Section 15086.

(e) A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record.

(f) The lead agency shall evaluate and respond to comments as provided in Section 15088. Recirculating an EIR can result in the lead agency receiving more than one set of comments from reviewers. The following are two ways in which the lead agency may identify the set of comments to which it will respond. This dual approach avoids confusion over whether the lead agency must respond to comments which are duplicates or which are no longer pertinent due to revisions to the EIR. In no case shall the lead agency fail to respond to pertinent comments on significant environmental issues.



(1) When an EIR is substantially revised and the entire document is recirculated, the lead agency may require reviewers to submit new comments and, in such cases, need not respond to those comments received during the earlier circulation period. The lead agency shall advise reviewers, either in the text of the revised EIR or by an attachment to the revised EIR, that although part of the administrative record, the previous comments do not require a written response in the final EIR, and that new comments must be submitted for the revised EIR. The lead agency need only respond to those comments submitted in response to the recirculated revised EIR.

(2) When the EIR is revised only in part and the lead agency is recirculating only the revised chapters or portions of the EIR, the lead agency may request that reviewers limit their comments to the revised chapters or portions of the recirculated EIR. The lead agency need only respond to (i) comments received during the initial circulation period that relate to chapters or portions of the document that were not revised and recirculated, and (ii) comments received during the recirculation period that relate to the chapters or portions of the earlier EIR that were revised and recirculated. The lead agency's request that reviewers limit the scope of their comments shall be included either within the text of the revised EIR or by an attachment to the revised EIR.

(3) As part of providing notice of recirculation as required by Public Resources Code Section 21092.1, the lead agency shall send a notice of recirculation to every agency, person, or organization that commented on the prior EIR. The notice shall indicate, at a minimum, whether new comments may be submitted only on the recirculated portions of the EIR or on the entire EIR in order to be considered by the agency.

(g) When recirculating a revised EIR, either in whole or in part, the lead agency shall, in the revised EIR or by an attachment to the revised EIR, summarize the revisions made to the previously circulated draft EIR.

Note: Authority cited: Section 21083, Public Resources Code. Reference: Section 21092.1, Public Resources Code; Laurel Heights Improvement Association v. Regents of the University of California (1993) 6 Cal. 4th 1112.

#### HISTORY

1. New section filed 8-19-94; operative 9-19-94 (Register 94, No. 33).

2. New subsections (f)-(g) filed 10-26-98; operative 10-26-98 pursuant to Public Resources Code section 21087 (Register 98, No. 44).

3. Amendment of subsections (f)-(f)(2) and new subsection (f)(3) filed 9-7-2004; operative 9-7-2004 pursuant to Public Resources Code section 21083(e) (Register 2004, No. 37).

4. Change without regulatory effect amending Note filed 10-6-2005 pursuant to section 100, title 1, California Code of Regulations (Register 2005, No. 40).

This database is current through 5/21/21 Register 2021, No. 21

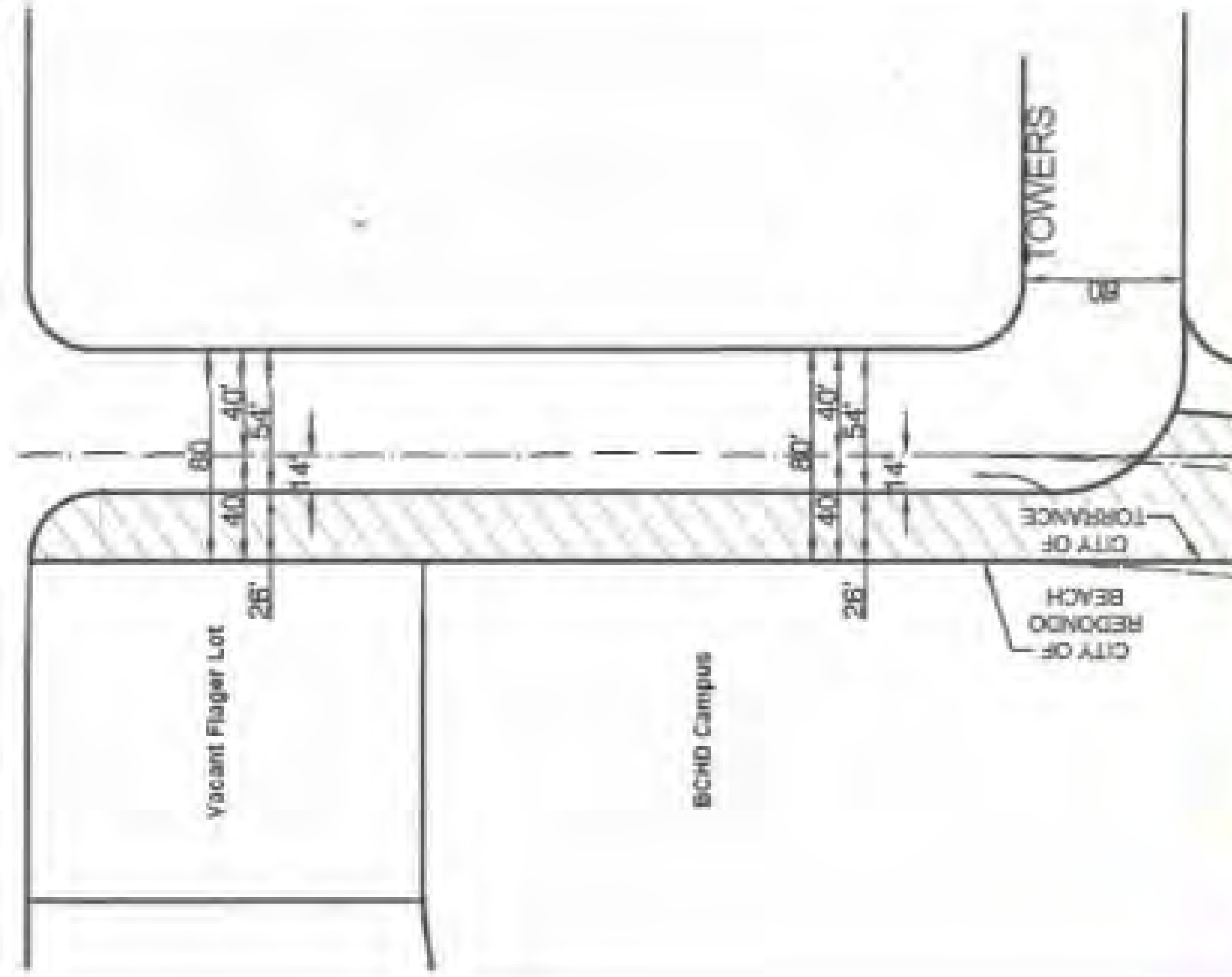
14 CCR § 15088.5, 14 CA ADC § 15088.5

End of Document

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The City of Torrance right-of-way extends into the vacant Flagler Lot by approximately 26 feet from the edge of the



*View of Central Driveway along North Prospect Avenue*



*View from Secondary Driveway on North Prospect Avenue*



*View from North Prospect Avenue & Diamond Street*



*View from Flagler Lane & Towers Street*

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

Linda  
2



## PETITION TO DEMAND BEACH CITIES HEALTH DISTRICT NOT BUILD THEIR PROPOSED "HEALTHY LIVING CAMPUS"

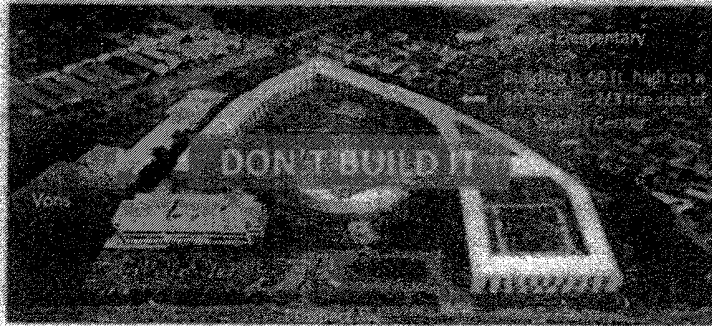
To the Honorable Albert Y. Muratsuchi, Assemblymember, 66th Assembly District, and to All Other Interested Elected Officials and Parties:

We, the undersigned registered voters in your district, are vehemently opposed to the proposed Beach Cities Health District (BCHD) plan to demolish the Beach Cities Health Center in order to build a high-density, \$530M, 420+ unit, assisted living facility over the next 15 years, and petition you to act in your constituents' interests as follows:

- State your opposition to this project.
- Introduce legislation to change the BCHD "design build" waiver to the "design bid" protection usually afforded to citizens.
- Introduce legislation clarifying that the "project" is beyond the scope of the intent of a health district.

First Name	Last Name	Signature	Address
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- 1 Christina Gill *Christina Gill* 24459 Ward St. Torrance, CA 90505
- 2 Chris Wolley *Chris Wolley* 22334 Hanover Road Torrance 90503
- 3 NGA BRUNETTI *NGA BRUNETTI* 2815 SEPULVEDA TORRANCE 90005
- 4 JUE MORDIAGA *JUE MORDIAGA* 4802 Mayan Dr TORRANCE 90501
- 5 Marlana Allen *Marlana Allen* 21425 Ladeene Ave. Torrance, CA 90503 *MARD*
- 6 Pamela Afremow *Pamela Afremow* 19412 Linda Dr. TORR 90503
- 7 Ann Gallagher *Ann P. Gallagher* 19404 Linda Dr. Torr 90503
- 8 Arthur Kuwahara *Arthur Kuwahara* 26925 Ocean Ave. Torr 90503
- 9 KENIE KELLY *Kenie Kelly* 2214B GRAHAM AVE *REDWOOD BEACH* 90278
- 10 Templeholder *Templeholder* 23560 MADRASE TORRANCE CA 90505



## PETITION TO DEMAND BEACH CITIES HEALTH DISTRICT NOT BUILD THEIR PROPOSED "HEALTHY LIVING CAMPUS"

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First Name	Last Name	Signature	Address
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- 1 Jasmin Espinoza Jan 26100 Narbonne Ave Comita CA 90717
- 2 Fritzi Vazquez 2232 W 247th St Comita CA 90717
- 3 Topie Poole 14905 Lemoli Ave Gardena, CA 90249
- 4 Nick Gosselin 2035 255th St. Comita, CA 90717
- 5 Hope Collins 5502 W 190th St Torrance CA
- 6 Inde acipie
- 7 Alice Pauls 2012 Perry Ave. Redondo Beach
- 8 Eileen Schwartz 5641 Sunset Dr. Redondo Beach, CA
- 9 Carol Ann Beck 121 Second St. Manhattan Beach CA 90266
- 10 Jacqueline S. Ayers 4410 W. 231st St Torrance CA 90505





## PETITION TO DEMAND BEACH CITIES HEALTH DISTRICT NOT BUILD THEIR PROPOSED "HEALTHY LIVING CAMPUS"

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First Name	Last Name	Signature	Address
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- 1 Tamiko Wakabayashi Tamiko Wakabayashi 19420 Linda, Torrance CA 90503
- 2 Kiyohisa Wakabayashi Kiyohisa Wakabayashi 19420 Linda Dr., Torrance CA 90503
- 3 David Schuler David Schuler 34 HIDDEN VALLEY Rd. Rolling Hills Estates, 90274
- 4 Kenneth Parham Kenneth Parham 316 N. Jennifer Ave, Torrance 91724
- 5 Masoud Emami Masoud Emami 194 Borrego Irvine, 92615
- 6 Tim Kanemaki Tim Kanemaki 200 S. Catalina Ave #10 RB 90277
- 7 Tami Estrada Tami Estrada 19923 MURIEL AVE TORR 90505
- 8 JOSE NEGRITE Jose Negrite 2380 Emily Lane Apt D Downey 90292
- 9 VERONICA NEGRITE Veronica Negrite 2380 Emily Lane Apt D Downey 90292
- 10 Deborah Carver Deborah Carver 1608 Hallgreen Dr Walnut CA 91789



## PETITION TO DEMAND BEACH CITIES HEALTH DISTRICT NOT BUILD THEIR PROPOSED "HEALTHY LIVING CAMPUS"

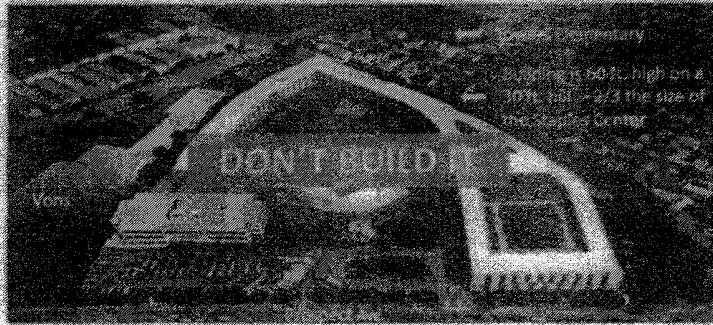
To the Honorable Albert Y. Muratsuchi, Assemblymember, 68th Assembly District, and to All Other Interested Elected Officials and Parties:

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First Name	Last Name	Signature	Address
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- 1 ~~Doris Granata~~ <sup>Doni Granata</sup> 43 Rollingwood Dr. R.H.E CA 90274
- 2 ~~Barbara Telberg~~ <sup>Barbara Telberg</sup> Jackson 3314 Mount Shasta Dr. San Pedro, CA 90732
- 3 ~~Anita Thomas~~ <sup>Anita Thomas</sup> 21921 Marguerite Ave. Torrance, CA 90503
- 4 ~~Frances Vander Stucken~~ <sup>Frances Vander Stucken</sup> 5503 Carmelwyn St Torrance CA 90503
- 5 ~~Fabiola Gutierrez~~ <sup>Fabiola Gutierrez</sup> 1121 Torrance Blvd Torrance CA 90502
- 6 ~~Leticia Martinez~~ <sup>Leticia Martinez</sup> 18303 Wall St. Carson Calif. 90746
- 7 ~~Ruth Velasco~~ <sup>Ruth Velasco</sup> 18832 Florwood Ave, Torrance CA 90504
- 8 ~~James A. Egnatub~~ <sup>James A. Egnatub</sup> 604 SUSANNAH RD RB 90275
- 9 ~~Ursula Dick~~ <sup>Ursula Dick</sup> 1922 Grevillea, Torrance 90502
- 10 ~~Vicki Thornton~~ <sup>Vicki Thornton</sup> 5230 Lomita Torrance 90505



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First Name	Last Name	Signature	Address
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- 1 Oscar Pichardo *Oscar Pichardo* 2109 ERNEST AVE REDONDO BEACH 90278
- 2 Joanne Pichardo *Joanne Pichardo* 2109 ERNEST AVE. Redondo Beach 90278
- 3 Joyce A. HARN *Joyce A. Harn* 2109 ERNEST AVE. Redondo Beach 90278
- 4 Katie Angelini *Katie Angelini* 2108A Ernest Ave Redondo Beach 90278
- 5 Linda Patrick *Linda Patrick* 2111 Ernest Ave Redondo Bch 90278
- 6 Ryan Patrick *Ryan Patrick* 2111 Ernest Avenue Redondo Bch 90278
- 7 Chris Farrell *Chris Farrell* 2112 Ernest Av - Redondo Bch 90278
- 8 Vaggie Asmar *Vaggie Asmar* 2115 Ernest Ave R. B 90278
- 9 Barbara Giba *Barbara Giba* 3018 Dow Ave REDONDO BEACH CA 90278
- 10 Kathy Rutt *Kathy Rutt* 2400 Spurgeon Ave, Redondo Beach 90278





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First Name	Last Name	Signature	Address
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- |    |          |              |  |
|----|----------|--------------|--|
| 1  | Gwen     | Yoshinaga    | 2404 Sebald Ave, RB 90278              |
| 2  | Matt     | Hedges       | 5307 Bindewald Rd, Torrance            |
| 3  | Cameron  | Maris        | 2308 Maricopa St, Torrance 90501       |
| 4  | Samantha | Maris        | 2308 Maricopa St Torrance CA 90501     |
| 5  | Gindy    | Otera        | 26314 Regent Ave, Long Beach 90717     |
| 6  | Monica   | Otera-Alfred | 1716 Gates Ave, Long Beach 90801       |
| 7  | Brian    | Alfred       | 1716 Gates Ave Manhattan Beach 90260   |
| 8  | Mitch    | Otera        | 26314 Regent Ave, Long Beach, CA 90717 |
| 9  | Trace    | Young        | 19219 Beckworth Ave Torrance CA 90503  |
| 10 | Robert   | Young        | 19219 Beckworth Ave Torrance 90503     |



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First Name	Last Name	Signature	Address
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- 1 Monica Yu *[Signature]* 19421 Hinsdale Ave Torrance, CA 90503
- 2 David Kranz *[Signature]* 19312 HINSDALE AVE. TORRANCE, CA. 90503
- 3 Catherine Proenza *[Signature]* 5230 Torrance at Torrance CA 90505
- 4 Pamela Otera *[Signature]* 22816 Greenwood Ave., Torr., Ca. 90505
- 5 Nancy Edgar *[Signature]* 19336 Hinsdale Torrance 90505
- 6 Andrea Hendrickson *[Signature]* 19329 Hinsdale Torrance 90503
- 7 ERIC HENDRICKSON *[Signature]* 19329 Hinsdale Torrance 90503
- 8 GARY HAWKINS *[Signature]* 4919 ONYX ST 90503
- 9 DAVID JAVIER *[Signature]* 1949 ROLLING VISTA DR #62 LOMITA, CA 90717
- 10 CATHY ITAYA *[Signature]* 1949 ROLLING VISTA #62 Lomita 90717



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First Name	Last Name	Signature	Address
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- |    |                  |             |  |
|----|------------------|-------------|--|
| 1  | Brian Foltz      | [Signature] | 19421 Hinsdale Ave., Torrance 90503      |
| 2  | Cindy Bray       | [Signature] | 19505 Hinsdale Ave. Torrance 90503       |
| 3  | Christina Watson | [Signature] | 19517 Hinsdale Ave Torrance 90503        |
| 4  | Houars Lareu     | [Signature] | 19417 Hinsdale Ave Torrance 90503        |
| 5  | Steen Kjaer      | [Signature] | 531 Hinsdale Ave Torrance 90503          |
| 6  | Sana Hamedani    | [Signature] | 1410 Diamond St. Redondo Beach, CA 90277 |
| 7  | John Monetti     | [Signature] | 19426 Hinsdale Ave Torrance 90503        |
| 8  | Melody Chuang    | [Signature] | 19425 Hinsdale Ave. Torrance 90503       |
| 9  | Philip Tang      | [Signature] | 19418 Hinsdale Ave Torrance 90503        |
| 10 | Curt Smith       | [Signature] | 19320 Hinsdale 90503                     |



## PETITION TO DEMAND BEACH CITIES HEALTH DISTRICT NOT BUILD THEIR PROPOSED "HEALTHY LIVING CAMPUS"

To the Honorable Albert Y. Muratsuchi, Assemblymember, 66th Assembly District, and to All Other Interested Elected Officials and Parties:

**We**, the undersigned registered voters in your district, are vehemently opposed to the proposed Beach Cities Health District (BCHD) plan to demolish the Beach Cities Health Center in order to build a high-density, \$530M, 420+ unit, assisted living facility over the next 15 years, and petition you to act in your constituents' interests as follows:

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- Introduce legislation clarifying that the "project" is beyond the scope of the intent of a health district.

First Name	Last Name	Signature	Address
1	Mike	Ishikawa	328 Via Nima
2	Ben	Kim	20 MURRAY DR, R.W.E. 90274
3	BERRIE	YAMADA	1741 HICKORY TORRANCE 90503
4	Mae	Fuchino	27673 FLAMING ARROW DR. R.P.V. 90275-3928
5	Dore	Ishikawa	26836 Grayslake Rd, R.P.V. 90275
6	AYOK	BAHRANA	30179 AVENIDA TRANQUILA, R.P.V. 90275
7	Kim	Ishikawa	30179 Avenida Tranquila R.P.V. 90275
8	ANDY	KIM	30179 Avenida Tranquila R.P.V. 90275
9	Janice	Pon-Ishikawa	26727 Basswood Ave R.P.V. 90275
10	Kristin	Warrick	27240 Sunnyvale R.P.V. 90274



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First Name	Last Name	Signature	Address
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- 1 Diane Uyehara *Diane Uyehara* 21602 Evelyn Ave Torrance 90503
- 2 MICHAEL UYEHARA *Michael Uyehara* 21602 Evelyn Ave Torrance 90503
- 3 *Joe Yamato* *Joe Yamato* 15249 Fairview Ave Torrance 90504
- 4 SATOSHI MIYATA *Satoshi Miyata* 14819 BUDLONG GARDEN 90267
- 5 Diane Hayashi *Diane Hayashi* 1560 W 186th St Torrance CA 90504
- 6 Robert Democh *R. Democh* 1742 Grevelia So. Pasadena CA 91030
- 7 Larina Luzzi 1026 N Redondo Ave Manh 90266
- 8 David Turner *David Turner* 22803 Kathryn Ave Tor 90505
- 9 Joe Marshall *Joe Marshall* 25483 Pine CREE LA <sup>Wilmington</sup> 90744
- 10 Christian Burke *Christian Burke* 1017 W. 185th St, LA 90248



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First Name	Last Name	Signature	Address
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- 1 <sup>ELLIE REED</sup> Ellie Reed (Ellie) 5601 Towers St
- 2 RYHAN ABERDULH ~~W~~ 5601 TOWERS ST
- 3 Sed SARKISIAN 19514 Redbeam Ave Torrance
- 4 <sup>GLADYS RUBIN</sup> Gladys Rubin 19615 Redbeam Ave Torrance 90503
- 5 Allen Rubin 19615 Redbeam Ave Torrance 90503
- 6 LIEZEL Rubin 19615 Redbeam Ave Torrance 90503
- 7 HAYA PINIER 19615 REDBEAM AVE TORRANCE
- 8 Mekebelis Takahashi 19609 Redbeam Ave Torrance
- 9 Arrene Aramian 5005 Bartlett Dr. Torrance
- 10 Teresa Steele 19420 Redbeam Ave Torrance



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First Name	Last Name	Signature	Address
1	Nancy Neal	[Signature]	518 Pacific Ave, Manhattan Bch. 90266
2	Kesha Neal	[Signature]	518 Pacific Ave, Manhattan Bch. 90266
3	Denyce Giannioses	[Signature]	200 Ave G, #320, DB 90277
4	W. Maureen Miller	[Signature]	814 N. Herrin St, Manhattan Beach 90266
5	Gayla Gabriel	[Signature]	4316 Rousseau Ln, Redwood City 94061
6	Kathleen Louny	[Signature]	125 S. Helberta B R.B 90277
7	Sage Louny	[Signature]	125 S. Helberta B R.B Ca 90277
8	Michael Nelson	[Signature]	21107 Donora Ave #10 Torrance CA 90503
9	Marshall Russo	[Signature]	2517 Via Verde, AVE 90274
10	Linda R Neas	[Signature]	11104 rez Ave Redondo Beach 90277





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First Name	Last Name	Signature	Address
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- 1 Courtney Sam Courtney Sam 20108 Tomlee Ave. Torrance, CA
- 2 David Sam David Sam 20108 Tomlee Ave Torrance, CA
- 3 Christopher Joseph Christopher Joseph 20114 Tomlee Ave. Torrance, CA
- 4 Kathy Joseph Kathy Joseph 4540 Laurette St Torrance CA 90503
- 5 Nikki Joseph Nikki Joseph 20114 Tomlee Ave Torrance CA 90503
- 6 STEVEN YORITA Steven Yorita 20102 TOMLEE AVE TORRANCE 90503
- 7 Scott Shui Scott Shui 1807 Starson Lane #1 RB 90278
- 8 Shirley Quan Shirley Quan 5 Golden Spar Pl RHE 90274
- 9 Joanne Joe Joanne Joe 20 Santa Bella Rd, RHE 90274
- 10 Leonard Heng Leonard Heng 5 Golden Spar Pl RHE 90274



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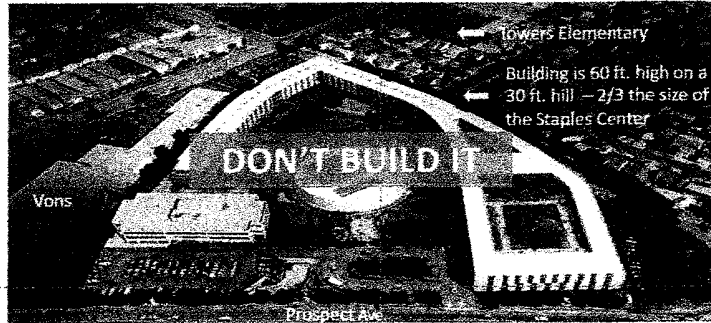
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First Name	Last Name	Signature	Address
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- |    |         |              |                    |  |
|----|---------|--------------|--------------------|--|
| 1  | Wendy   | Yorita-Solis | Wendy Yorita Solis | 1903 Bataan Rd #8, Redondo Beach, CA 90278 |
| 2  | Vincent | Solis        | Vincent Solis      | "  |
| 3  | Dean    | Sato         | DL                 | 22001 Ocean Ave. Torrance, CA 90503        |
| 4  | Cheryl  | Tsuchida     | Cheryl Tsuchida    | 4821 White Court Torrance, CA. 90503       |
| 5  | Kris    | Sato         | Kris Sato          | 22001 Ocean Ave. Torrance, CA 90503        |
| 6  | Karen   | Hostetler    | Karen Hostetler    | 2922 Whitley Collins Dr. PHE, CA 90275     |
| 7  | Debbie  | Tay-Qua      | Debbie Tay-Qua     | 7025 Hedgewood Dr. PHE or 90275            |
| 8  | Donna   | Oksmura      | Donna Oksmura      | 22911 Felbar Ave, Torrance, CA 90505       |
| 9  | Lana    | Fujimoto     | Lana Fujimoto      | 4125 Kanya Dr. Torrance                    |
| 10 | KEN     | FUJIMOTO     | Ken Fujimoto       | 4125 KANYA DR TORRANCE                     |



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First Name	Last Name	Signature	Address
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- 1 Janet Nozaki Janet Nozaki 28409 Plainfield Dr. RPV, CA 9027
- 2 Henry Nozaki Henry Nozaki 28418 Coveridge Dr. RPV, CA 90275
- 3 NAOMI NOZAKI Naomi Nozaki 28418 COVERIDGE DR. RPV, CA 90275
- 4 EDMUND CHAN Ed Chan 3430 226<sup>th</sup> STREET, CA 90505
- 5 Sujane Wang Sujane Wang 21 Hillcrest Meadows RHE, CA 90274
- 6 Sam Wang Sam Wang 21 Hillcrest Mdw, RHE CA 90274
- 7 Wai Ling Chan Wai Ling Chan 3430W, 226th St, Torrance CA 90505
- 8 Nicole Hostetler Nicole Hostetler 90221 Whitley Collins Dr. RHE, CA 90275
- 9 DAVID HOSTETLER David Hostetler 29221 WHITLEY COLLINS DR, ROLLINGHILL ESTATES CA 90275
- 10 Cynthia UEMURA Cynthia Uemura 28710 Golden Meadow RPV 90275



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First Name	Last Name	Signature	Address
1	BRIAN RUTT	<i>Brian Rutt</i>	2400 Spurgem Ave, Redondo Beach 90278
2	Charon Stanziolo	<i>Charon Stanziolo</i>	3016 Deco R.B. 90278
3	Sona Yacoub	<i>Sona Yacoub</i>	2403 SPURGEON Ave R.B. 90278
4	Carol Ann Beck	<i>Carol Ann Beck</i>	121 Second St. Man. Beh. 90266
5	CATHERINE DEAGICH	<i>Catherine Deagich</i>	304 LARSSON ST. MAN. Beh 90266
6	Jessica Samples	<i>Jessica Samples</i>	115 Paseo de la playa RB, CA 9027
7	SUSAN TORTORICE	<i>Susan Tortorice</i>	1310 ESPLANADE REDONGBCH
8	Sofia Granillo	<i>Sofia Granillo</i>	
9	Debbie Jones	<i>Debbie Jones</i>	P.O Box 2251 M.B. 90267
10	AAREN CLINE	<i>Aaren Cline</i>	4006 SCOTT ST TORRANCE 90503



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First Name	Last Name	Signature	Address
1	Mark	Neban	MEner 511 N. Prospect
2	Ashley	Moranahan	519 N. Prospect Ave
3	Daniel	M...	519 N. Prospect Ave
4	GERTA	LIND	517 N. PROSPECT AVE.
5	DONALD	LIND	517 N. PROSPECT AVE.
6	Kathryn	Keokoe	403 N Prospect Ave
7	Jorge	A Castro	609 N. Prospect
8	Ana	R Castro	609 N Prospect
9	Myles		611 N Prospect
10	Robin	Tolson	611 N Prospect Av

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1	Mark	Neban	MEner 511 N. Prospect
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3	Daniel	M...	519 N. Prospect Ave
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5	DONALD	LIND	517 N. PROSPECT AVE.
6	Kathryn	Keokoe	403 N Prospect Ave
7	Jorge	A Castro	609 N. Prospect
8	Ana	R Castro	609 N Prospect
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10	Robin	Tolson	611 N Prospect Av



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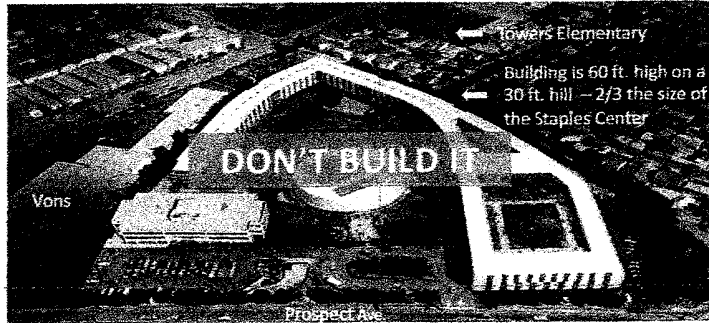
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First Name	Last Name	Signature	Address
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- |    |          |        |  |
|----|----------|--------|--|
| 1  | MARY LOU | ELLARS | Mary Lou Ellars 19614 MILDRED AVE., TORRANCE, CA 90503 |
| 2  | HELEN    | YEE    | Helen Yee 19901 MILDRED AVE., TORRANCE, CA 90503       |
| 3  | RONALD   | ELLARS | Ronald Ellars, 19614 MILDRED AVE., TORRANCE, CA 90503  |
| 4  | WILLIAM  | YEE    | William Yee 19901 Mildred Ave Torrance CA 90503        |
| 5  | DARRELL  | FARR   | Darrell Farr 19924 MILDRED AVE TORRANCE CA 90503       |
| 6  | KAREN    | ROGERS | Karen Rogers 19930 Mildred Ave Torrance CA 90503       |
| 7  | MARKUS   | PERNER | Markus Perner 19930 Mildred Ave Torrance CA 90503      |
| 8  |          |        |  |
| 9  |          |        |  |
| 10 |          |        |  |



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First Name	Last Name	Signature	Address
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- 1 Bryant Nishikawa [Signature] 1520 W. Carson St, Torrance 90501
- 2 Mina Aliyanni [Signature] 1 Arrowhead Lane, Rte 90 275
- 3 Susan Leland [Signature] 2306 241st St. Lomita 90717
- 4 Nathan Dunlap [Signature] 3727 Emerald St Unit D, Torrance
- 5 Kelli Dunlap [Signature] 20102 Tomlee Ave, Torrance
- 6 \_\_\_\_\_
- 7 \_\_\_\_\_
- 8 \_\_\_\_\_
- 9 \_\_\_\_\_
- 10 \_\_\_\_\_



Lisa L



## PETITION TO DEMAND BEACH CITIES HEALTH DISTRICT NOT BUILD THEIR PROPOSED "HEALTHY LIVING CAMPUS"

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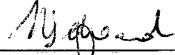
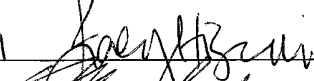
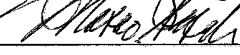
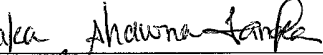


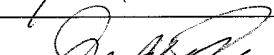
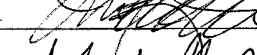
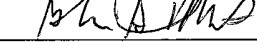


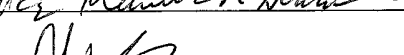

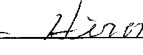

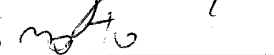
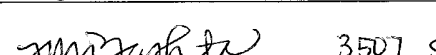
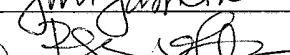
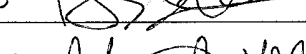

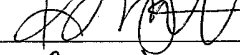
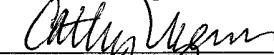



First Name	Last Name	Signature	Address
1	Corinne Eisenhart	Corinne Eisenhart	3202 W. 154th St. Gardena CA 90249
2	Robert Eisenhart	Robert Eisenhart	3202 W. 154th St Gardena CA 90249
3	Jennifer Eisenhart	Jennifer Eisenhart	2432 Pacific Coast Hwy #127 Longita, CA 90717
4	JOHN CONYNE	[Signature]	1506 S. CATALINA Ave #C RD 90277
5			
6			
7			
8			
9			
10			

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	First Name	Last Name	Signature	Address
1	NATALIE	SCHERUCANO		20010 BURIN AVE TORRANCE
2	Tracy	Higuchi		2840 May <sup>AVE</sup> Redondo Beach
3	Masao	Sasaki		2017 233 <sup>rd</sup> ST, Torrance
4	<del>Tanaka</del> Shawna	<del>Tanaka</del>		1853 W. 181 <sup>st</sup> St. Torrance 90504
5	SHUSI	YAMADA		5608 WHITE CT TORRANCE 90503
6	Marc-Mitchell	Miyoshini		17035 Spinnery Ave Torrance 90504
7	Inogene	Imada		18501 Manhattan BL TORR 90504
8	Gloria S.	Monimuro		2318 W. 229 <sup>th</sup> ST 90501
9	Kimberley	Aponte		1926 W. 237 <sup>th</sup> ST, Torrance, 90501
10	Kenneth	Hernandez		3414 W 170 <sup>th</sup> ST Torrance 90504
11	Charlene	Nation		2240 Kathryn Ave Torr 90505
12	HIROMI	MATSUDA		2018 W 236 <sup>th</sup> ST Torrance 90501
13	KAZUE	MAESAKI		1701 Sabido AVE Torrance 90501
14	ERIC	Kishimoto		3527 SARA DR 90503
15	JUDY	MIYASHITA		3507 SARA DR. TORRANCE CA 90503
16	Peggy	Kamon-Mato		17515 DAPHNE AVE Torrance 90504
17	Chirako	Morimoto		2318 W. 229 <sup>th</sup> ST. Torrance 90501
18	Katelyn	Morimoto		2318 W. 229 <sup>th</sup> ST. Torrance 90501
19	Cathy	Uyemura		2221 W. 180 <sup>th</sup> ST TORR 90504
20	TOYOKO	Yuki		3833 W 181 <sup>st</sup> St Torrance 90504
21	Lori	Yamada		5608 White Court Torrance CA 90503
22	MARIO	SCHOONRAAD		20010 BURIN AVE TORRANCE 90503.
23	Elaine	Tefft		20011 Donora Ave. Torrance 90503 CA
24	JOHN	MATO		17515 DAPHNE AVE TORRANCE 90504
25	Kristen	Inouye		20818 Felker Dr. Torrance 90503

# PETITION TO DEMAND BEACH CITIES HEALTH DISTRICT NOT BUILD THEIR PROPOSED "HEALTHY LIVING CAMPUS"

To the Honorable Albert Y. Muratsuchi, Assemblymember, 66th Assembly District, and to All Other Interested Elected Officials and Parties:

**We**, the undersigned registered voters in your district, are vehemently opposed to the proposed Beach Cities Health District (BCHD) plan to demolish the Beach Cities Health Center in order to build a high-density, \$530M, 420+ unit, assisted living facility over the next 15 years, and petition you to act in your constituents' interests as follows:

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- Introduce legislation clarifying that the "project" is beyond the scope of the intent of a health district.

First Name	Last Name	Signature	Address
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- Ann Wolfson Ann Wolfson 19802 Tomlee Ave. Torrance
- Wendan Ni [Signature] 19702 Mildred Ave, Torrance
- Brian Wolfson [Signature] 19802 Tomlee Ave, Torrance.
- Lisa Limm [Signature] 19902 Mildred Ave, Torrance 90503
- Alicia Walker [Signature] 21712 Reynolds Dr Torrance 90503
- Carolyn Finkenbeiner [Signature] 5123 Merrill St, Torrance, 90503
- Laurie Craig [Signature] 5211 Lee St, Torrance, 90503
- Rosie Javard [Signature] 3702 Michelle Dr. Torrance 90503
- Erin Hicks-Dawson [Signature] 5115 Towers St. Torrance 90503
- Susie Sam [Signature] 20108 Tomlee Ave Torrance 90503
- LANCE FUJIMOTO [Signature] 18507 AME AVE TORRANCE CA 90503
- AMY YICK [Signature] 20718 Christine Ave. Torf 90503
- MICHAEL QUINN [Signature] 5102 PATRICK ST, TORRANCE 90503
- Lee Beiser [Signature] 20005 Ingrum Way Torrance 90503
- Felipe Braunthal [Signature] 5190 Deelane St Torrance 90503
- Kyla Adams [Signature] 5527 Halison St. Torrance 90503
- Jessica Morrison [Signature] 2510 Fisk Ave 90503
- Brigette Pratt [Signature] 19923 Mildred Ave, Torrance CA 90503
- Don Pratt [Signature] 19923 Mildred Ave, Torrance CA 90503
- James Childers [Signature] 19907 Mildred Ave, Torrance CA 90503
- Cheryl Childers [Signature] 19907 Mildred Ave Torrance CA 90503
- James Childers IV [Signature] 19907 Mildred Ave, Torrance CA 90503
- Oliver Kou [Signature] 19801 Mildred Ave, Torrance CA 90503
- Lucy Chienkou [Signature] 19801 Mildred Ave Torrance CA 90503
- KEITH SCHOENING [Signature] 19715 MILDRED AVE TORRANCE

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First Name	Last Name	Signature	Address
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- 1 Louise MATSUMURA *Louise Matsumura* 1961 W. 230<sup>th</sup> St TORRANCE 90501
- 2 Kimiko Kiyohara *Kimiko Kiyohara* 1312 W. 169<sup>th</sup> Pl. Gardena 90247
- 3 Yuriko Toma *Y. Toma* 3202 Cardwood Ln, Torrance, CA 90505
- 4 Edith Itarada *Edith Itarada* 1424 W. 172nd St. Gardena 90247
- 5 Emi Kono *E. Kono* 18326 S. Del Mar Ave. Torrance, CA
- 6 Donna Sanada *Donna Sanada* 16502 Kristin Ave. Torrance, CA 90504
- 7 ALAN MIWA *Alan Miwa* 1954 W. 186<sup>th</sup> St TORRANCE CA 90504
- 8 WAYNE SAUER *Wayne Sauer* 2106 MATHEWS AVE #C REDONDO BEACH, CA 90278
- 9 EMILIO SASAKI *Emilio Sasaki* 2213 W 16<sup>th</sup> ST. TORR CA 90504
- 10 BRIAN ANDERSON *Brian Anderson* 4826 Milne Dr Torrance 90505
- 11 Joe Zeiler *Joe Zeiler* 5623 Maria Linda 90503
- 12 Ron Sturtz *Ron Sturtz* 2104 Grant Ave Unit 6 90278
- 13 CLORIA COULD *Cloria Could* 5485 HELBERTA RD 90277
- 14 Anita Sack *Anita Sack* 21406 Marjorie Ave CA 90503
- 15 Noelle Budrovich *Noelle Budrovich* 2894 W. 229<sup>th</sup> St Torrance 90505
- 16 Paris Booshee *Paris Booshee* 19309 Beckworth Ave 90503
- 17 Tony Smith *Tony Smith* 19526 Donna Ave. Torrance, CA 90503
- 18 Mia Leminger *Mia Leminger* 4503 Narrot St. Torrance CA 90503
- 19 Stacey Box *Stacey Box* 5330 Norton St. Torrance 90503
- 20 Sharon Cortez *Sharon Cortez* 5039 Halison ST. Torrance, 90503
- 21 Bireta Rose Vellutini *Bireta Rose Vellutini* 5330 Wilma St Torrance 90503
- 22 Phila Tuccinardi *Phila Tuccinardi* 5422 WILMA ST. TORRANCE CA 90503
- 23 Candace Williams *Candace Williams* 5413 Wilma St Torrance 90503
- 24 SUEHAIR SAMAN *Suehair Saman* 5321 WILMA ST. TORRANCE
- 25 Susan Yano *Susan Yano* 19921 Tomlee Ave, CA 90503  
Torrance, CA 90503

# PETITION TO DEMAND BEACH CITIES HEALTH DISTRICT NOT BUILD THEIR PROPOSED "HEALTHY LIVING CAMPUS"

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First Name	Last Name	Signature	Address
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- 1 Aiko Inada Aiko Inada 19408 REDBEAM AVE. TORRANCE 90503
- 2 Mae Nakagawa Mae Nakagawa 1233 W. 213th St. Torr. 90502
- 3 Beverly Ikeda Beverly Ikeda 14515 S. Budlong Gardens 90247
- 4 Gladys Yokota Gladys Yokota 18308 Manhattan Pl. Torrance 90504
- 5 Emi Lynn Isomoto Emi Isomoto 2413 W. 178th St. Torrance 90504
- 6 Akeni Shimizu Akeni Shimizu 1913 W. 237th Pl " 90501
- 7 Kimiye Suminaga Kimiye Suminaga 1948 W. 186 St Torrance 90504
- 8 Debbie Takashima Debbie Takashima 3214 W 181st St Torrance 90504
- 9 Kiyoko Sasaki Kiyoko Sasaki 1962 W. 233 St., Torrance 90501
- 10 TAMAO SASAKI Tamao Sasaki 1962 W. 233<sup>rd</sup> ST, TORRANCE 90501
- 11 JENNIFER YAMAMOTO Jennifer Yamamoto 2218 W. 180TH PL TORR 90504
- 12 JOHN ENGLISH John English 3724 SPENCER ST #202, TORRANCE, 90503
- 13 Maybela Spadolini Maybela Spadolini 20535 Vaccaro Ave Torrance 90503
- 14 John S. Perez JOHN PEREZ 14928 INGDOM TORRANCE
- 15 TERRENCE BENSON Terrence Benson 431 N. PROSPECT AVE REDONDO BEACH 90277
- 16 Sarah Straton Sarah Straton 2726 Ralston Ln, Redondo Beach 90278
- 17 James C. Kelly James C. Kelly 1724 WOLLACOTT S Redondo Beach 90278
- 18 Brent Sashner Brent Sashner 110 The Vlg # Redond 90278
- 19 DYLAN JOHNSON Dylan Johnson 609 Fernside Ave 90278.
- 20 Nadim Mekari Nadim Mekari 1701 W. 168th St, Gardena 90247
- 21 ELEANOR ORTIZ Eleana Ortiz 23117 EVEL AVE TORRANCE 90505
- 22 Christine T. Nunez Christine T. Nunez 1934 W. 186TH ST., TORRANCE, CA 90504
- 23 Etsuko Nakano Etsuko Nakano 17112 S Dalton Ave Gardena 90247
- 24 DENISE DUNKEL Denise Dunkel 5032 CARMEN ST. TORRANCE 90503
- 25 VIOLET NISHIHARA Violet Nishihara 2709 W 164 St TORRANCE 90504

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First Name	Last Name	Signature	Address
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- 1 Aya Quimondi Aya Quimondi 4536 Darentt. Torrance 90503
- 2 Katherine Sallig Katherine Sallig 19707 Redbeam Ave. Torrance 90503
- 3 Pauline Srolas P.S. 20110 Hinsdale ave, torrance, CA 90503
- 4 Simon Hoffman Simon Hoffman 5326 CARMELINA ST. TORRANCE, CA 90503
- 5 Ken PETER Ken Peter 2826 W 166TH ST TORRANCE CA 90504
- 6 Christiane Onilla Christiane Onilla 5650 AUCCT Tor. 90503
- 7 Keith Kabealo Keith Kabealo 423 Manhattan Ave, HP, 90254
- 8 FRED LESTER Fred Lester 20017 Tomlee
- 9 MARY MLESTER Marym Lester 20017 Tomlee Ave, Tor 90503
- 10 BRYAN LESTER Bryan Lester 20014 Tomlee Ave TOR. 90503
- 11 Laura Woolsey Laura Woolsey 20023 Tomlee Ave Tor 90503
- 12 Brian Park Brian Park 20035 Tomlee Ave Torrance 90503
- 13 Lynne Yorita Lynne Yorita 20102 Tomlee Ave Torrance 90503
- 14 Thomas Onito Thomas Onito 2014 W 180TH PL, Torrance 90501
- 15 Gwen Powell Gwen Powell 4907 Towers St. Torrance, CA 90503
- 16 DON POWELL Don Powell 4907 TOWERS ST TORRANCE CA 90503
- 17 James Crawford James Crawford 1516 Acacia Ave Torrance CA 90501
- 18 JOSEPH CHSTAN Joseph Chstan 44158 SPENCER ST, TORRANCE, CA 90503
- 19 Judy Leach Judy Leach 2559 PLAZA DEL AMO TORRA 90503
- 20 KATHY GOULD Kathy Gould 405 S. LUCIA AVE, R.B 90277
- 21 YURI CHOI Yuri Choi 23208 MAPLE AVE, TORRANCE CA 90505
- 22 Mark Chase Mark Chase 4049 W. 163rd St. Laundale, 90260
- 23 Alice Archer Alice Archer 19621 Tomlee Ave CA 90503
- 24 ALAN ARCHER Alan Archer 19621 TOMLEE AVE. CA. 90503
- 25 Jerry Katron Jerry Katron 20171 Redbeam Ave 90523

# PETITION TO DEMAND BEACH CITIES HEALTH DISTRICT NOT BUILD THEIR PROPOSED "HEALTHY LIVING CAMPUS"

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First Name	Last Name	Signature	Address
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- 1 Jon McDonald Jon McDonald 5629 Bowers St Torrance Ca
- 2 Linda Zelik Linda Zelik 19405 Linda Dr, Torrance
- 3 JOSEPH ZELIK Joseph Zelik 19405 Linda Dr, Torrance, 90503, CA.
- 4 Jim & Judi Serk 19510 Linda Dr, Torrance 90503
- 5 Linda Feldman 19515 Linda Dr Torrance 90503
- 6 Virginia Ogawa Virginia Ogawa 19616 Linda Dr Torrance 90503
- 7 TIM OZENNE Tim Ogawa 19616 Linda Dr Torrance 90503
- 8 CLYDE IWATA, CLYDE IWATA 19946 REDBEAM AVE. TORRANCE, CA 90503
- 9 Stephanie Lee Stephanie Lee 19819 Redbeam Torrance 90503
- 10 Howard Lee Howard Lee 19819 Redbeam Torrance 90503
- 11 Malcolm Kong Malcolm Kong 19803 Redbeam Torrance 90503
- 12 EVA J Kong Eva J Kong 19803 REDBEAM Torrance 90503
- 13 GLADYS RUBIN Gladys Rubin 19615 Redbeam Tor CA 90503
- 14 JOAQUINE FANEUFF Joanne Faneuff 19507 Redbeam Tor. 90503
- 15 Avelina Daum Avelina Daum 19403 Redbeam Avenue
- 16 Justine MWS Justine MWS 19768 Tonlee Ave Torr CA 90503
- 17 DOROTHY CAN Dorothy Can 20116 WAYNE AVE, TERR CA 90503
- 18 Jackie Ecklund Jackie Ecklund 20124 WAYNE AVE TERR. CA 90503
- 19 Keith Huff Keith Huff 20022 Pruitt Dr. Torrance, 90503
- 20 Shweta Sadhana Shweta Sadhana 2521 Spencer St. Torrance 90503
- 21 Katie Benim Katie Benim 20040 Anza Ave Torrc. 90503
- 22 Ed Portune Ed Portune 19611 Driew Pl. Torr 90503
- 23 Rosa Fontane Rosa Fontane 20115 PRUITT DR. TORR 90503
- 24 Madheer Madheer 4904 Narrox St.
- 25 Mari Kauskill Mari Kauskill 19402 Redbeam Ave., Torrance, Ca 90503



# PETITION TO DEMAND BEACH CITIES HEALTH DISTRICT NOT BUILD THEIR PROPOSED "HEALTHY LIVING CAMPUS"

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First Name	Last Name	Signature	Address
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- 1 RALPH ANTHONY, Ralph 19703 MILDRED AVE. TORRANCE CA
- 2 Deened Johnson, Irene K. Johnson 19521 Mildred Ave. Torrance, CA 90503
- 3 Aileen Pavlin, Aileen Pavlin 119515 Mildred Ave Torrance CA 90503
- 4 JOHN J. PARKER, John J. Parker 19402 Mildred Ave 90503
- 5 RAMONA MILLER, Ramona Miller 19402 Mildred Ave 90503
- 6 Jessy Grant, Jessy Grant 19508 Mildred Ave Torrance 90503
- 7 Greg Grant, Greg Grant 19508 Mildred Ave
- 8 SUSAN BERZ, Susan Berz 19802 Mildred Ave Torrance, CA
- 9 Derek Berz, Derek Berz 19802 Mildred Ave Torrance CA
- 10 Hans Ackermann, Hans Ackermann 19908 Mildred Ave Torrance
- 11 Marisa Hartock, Marisa Hartock 19924 Mildred Ave TORRANCE
- 12 Subota, Alexandra, Subota 20102 Mildred Ave. Torrance
- 13 Barry Gordon, Barry Gordon 20114 Mildred Ave Torrance
- 14 GEORGE GEE, George Gee 20003 MILDRED AVE TORRANCE CA
- 15 Hanna Gee, Hanna Gee 20003 Mildred Ave Torrance, CA
- 16 JACK WONG, Jack Wong 20101 MILDRED AVE 90503
- 17 Sang Kim, Sang Kim 20019 Mildred Ave Torrance 90503
- 18 Yu Yang Kim, Yu Yang Kim 20019 Mildred Ave Torrance 90503
- 19 Alex Wolfson, Alex Wolfson 19802 Tombee Ave, Torrance 90503
- 20 Lyndan M. Hardy, Lyndan M. Hardy 19616 Redbeam Ave, Torrance 90503
- 21 Masao Uyei, Masao Uyei 19516 Tombee Ave Torrance, 90503
- 22 Evely Nabe & 72, Evely Nabe & 72 20018 MILDRED AVE TORR 90503
- 23 Mark Hill, Mark Hill 20016 Foxden Ave Torrance
- 24 Laura Vios, Laura Vios 20031 Redbeam Ave Torr 90503
- 25 Bonnie Gay Bacon, Bonnie Gay Bacon 20115 Redbeam Ave Torr. 90503

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First Name	Last Name	Signature	Address
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- |    |                       |                       |  |
|----|-----------------------|-----------------------|--|
| 1  | JOSEPH TOMPKINS       | Joseph S. Tompkins    | 13439 TOMLEE AVE.                      |
| 2  | Michael Keltus        | Michael Keltus        | 19415 M. Idred Ave.                    |
| 3  | Erick Claudio         | Erick Claudio         | 16907 Halldale Ave. Gardena            |
| 4  | Tyler Kawamoto        | Tyler Kawamoto        | 19516 Tomlee Ave                       |
| 5  | KEVIN SHIOKA          | Kevin Shioka          | 19503 TOMLEE AVE.                      |
| 6  | Catherine Keller      | Catherine Keller      | 5313 Towers St.                        |
| 7  | MONIKA CORCORAN-RIGGS | Monika Corcoran-Riggs | 1035 4th St<br>HERMOSA BEACH, CA 90701 |
| 8  | Ryan Marks            | Ryan Marks            | 2032 Andrus Ave, Torrance CA 90501     |
| 9  | Jennifer Marks        | Jennifer Marks        | 2032 Andrus Ave, Torrance 90501        |
| 10 | Kathy Humphry         | Kathy Humphry         | 22510 Reynolds Dr Torrance 90504       |
| 11 | Robert Humphry        | Robert Humphry        | 22510 Reynolds Dr. Torrance 90504      |
| 12 | Ann Santner           | Ann Santner           | 19445 Tomlee Ave. Torrance 90503       |
| 13 | SANTIAGO SANTANA      | Santiago Santana      | 19445 TOMLEE AVE TORRANCE CA 90503     |
| 14 | JUAN MOCEGA           | Juan Moege            | 19509 Tomlee Ave. Torrance 90503       |
| 15 | Stephane Shioka       | Stephane Shioka       | 19503 Tomlee Ave Torrance 90503        |
| 16 | Maria Moege           | Maria Moege           | 19509 Tomlee Ave Torrance 90503        |
| 17 | Henry Aoto            | Henry Aoto            | 19607 Tomlee Ave Torrance 90503        |
| 18 | Shirley Aoto          | Shirley Aoto          | 19607 Tomlee Ave, Torrance 90503       |
| 19 | Tim Meehan            | Tim Meehan            | 19427 Tomlee Ave, Torrance 90503       |
| 20 | Lynne Meehan          | Lynne Meehan          | 19427 Tomlee Ave, Torrance 90503       |
| 21 | Jan Thomas            | Jan Thomas            | 30605 Cartier Rd 90275                 |
| 22 | Dean Thomas           | Dean Thomas           | 414 Torrance Rd 90503                  |
| 23 | Rick Shaw             | Rick Shaw             | 30605 Cartier Drive                    |
| 24 | Corina O'Neill        | Corina O'Neill        | 4708 Bulova St. Torrance 90503         |
| 25 | TIMOTHY J O'NEILL     | Timothy J O'Neill     | 4708 BULOVA ST TORR 90503              |

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First Name	Last Name	Signature	Address
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- 1 Chelsea Ross CR 248 34th street Hermosa beach
- 2 Aaven Rice G-D 248 34th street Hermosa beach
- 3 Joseph BURLESON J. 322 Market St. Lawce/CA 90671
- 4 Victor Cegarra 16914 Osage Ave. Torrance
- 5 Susan Cegarra 16914 Osage Ave Torrance, CA 90504
- 6 Justin Pettier J. 15117 S Berendo Ave Gardena, CA 90247
- 7 Vincenza Corticchio 1302 Amethyst St Redondo Beach, CA 90276
- 8 Linda Muir Linda Muir 19516 Ronald Ave Torrance CA 90503
- 9 John Behrens John 19210 Ronald Ave Torrance
- 10 John Behrens John 19210 Ronald Ave Torrance, CA 90503
- 11 Athene Behrens Athene 19210 Ronald Ave Torrance, CA 90503
- 12 Benjamin Wootter 16327 Spinning Ave Torrance CA 90504
- 13 Alan Buchark 12114 Amethyst St. wif c Redondo Beach CA 90277
- 14 MAURICE FROST 1215 AMETHYST ST. REDONDO BEACH, 90277
- 15 Linda Kranz Linda 14312 Hinsdale Ave. Torrance, CA 90503
- 16 Judith Haueter Judith Haueter 23408 Sunna Torrance CA 90505
- 17 Patty Nishi Patty Nishi 2761 W. Carson Torr. Cal 90503
- 18 AILEEN BLAIR Aileen Blair 3 Stallion Dr. Redondo PV, CA 90275
- 19 Michael O'Neil 15514 N. Ave Torrance 90514
- 20 David Schrader 50A 17th St, HB, CA 90254
- 21 DOUG ELLIOTT 1800 S 90th #4, Rm. 90277
- 22 Oscar B. B. 21518 ARIZONA AVE Torrance
- 23 EAnn Nakamura 21345 Hawthorne Blvd. 90503 John Nakamura
- 24 ERIC DUBA 1716 ARMOUR LANE, REDONDO BEACH, CA 90278
- 25 Patrick Bailey 15308 Wilkie Ave Gardena CA 90249

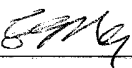
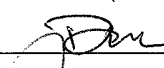
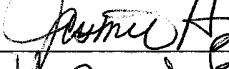
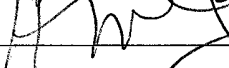
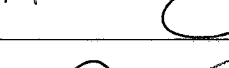
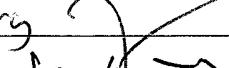
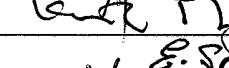
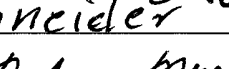

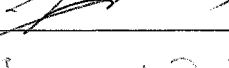
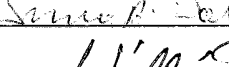

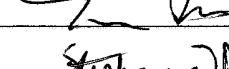





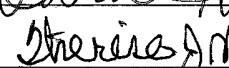
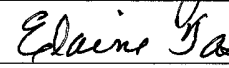
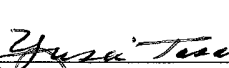
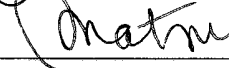
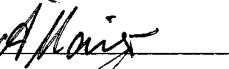
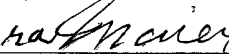

# PETITION TO DEMAND BEACH CITIES HEALTH DISTRICT NOT BUILD THEIR PROPOSED "HEALTHY LIVING CAMPUS"

To the Honorable Albert Y. Muratsuchi, Assemblymember, 66th Assembly District, and to All Other Interested Elected Officials and Parties:

**We**, the undersigned registered voters in your district, are vehemently opposed to the proposed Beach Cities Health District (BCHD) plan to demolish the Beach Cities Health Center in order to build a high-density, \$530M, 420+ unit, assisted living facility over the next 15 years, and petition you to act in your constituents' interests as follows:

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- Introduce legislation to change the BCHD "design build" waiver to the "design bid" protection usually afforded to citizens.
- Introduce legislation clarifying that the "project" is beyond the scope of the intent of a health district.

First Name	Last Name	Signature	Address
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- 1 LIZ NAROLI  3450 EMERALD ST, #17 90503
- 2 DANA LAROCHE  19929 MILDRED AVE TORRANCE 90503
- 3 Jasmine Hyun  5623 ALIX CT. TORR 90503
- 4 Heidi Takenawa  3910 W. 105TH ST TORR 90504
- 5 Rich  19526 HINSDALE AVE TORR 90503
- 6 Justin Eisenberg  19508 REDBEAM AVE, TORRANCE CA
- 7 Kenneth Yano  19921 Tomlee Ave Torr 90503
- 8 Elisabeth Schneider  19909 Tomlee Ave Torr 90503
- 9 Nobuo MURAI  19816 Tomlee Ave. TORR. 90503
- 10 Jingyi Li  19922 Tomlee Ave. 90503
- 11 ANNA DABURA  19916 Tomlee Ave 90503
- 12 William Momary  19915 Tomlee Ave, Torr. 90503
- 13 Tom Momary  4422 Emerald St. Torr 90503
- 14 STEPHANIE DYO  19915 Tomlee Ave Torrance 90503
- 15 Nicole McIntosh  19709 Tomlee, Torrance 90503
- 16 Doug Field  19783 Tomlee Torrance 90503
- 17 Ian McIntosh  19709 Tomlee, Torrance, CA 90503
- 18 Daniel Fink  19714 Tomlee Torrance, CA 90503
- 19 Tara Fink  19714 Tomlee Torrance, CA. 90503
- 20 THIÉRESE NOWAK  19902 Tomlee Ave TORR 90503
- 21 Elaine Tasato  19910 Tomlee Ave., Torrance, CA 90503
- 22 Yusei Tasato  19910 Tomlee Ave, Torrance, CA 90503
- 23 Brenda Matsui  19903 Tomlee Ave, Torrance CA 90503
- 24 Arnold Maier  19702 Tomlee Ave. Torrance 90503
- 25 Flora Maier  19702 Tomlee Ave. Torrance 90503

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First Name	Last Name	Signature	Address
1	ANNE DAVIS		20312 Wayne Ave Torrance 90503
2	Chana Mok		4312 N 178th Torrance
3	Dana Hutchison		19903 Hinsdale Ave Torrance 90503
4	NANCY Girardin		519 Halison St 90507
5	Kristina Brown		214 Monica St 90503
6	Felicia Torre		5128 Towers St, 90503
7	Areg Sasaki		112 Via Alameda PUECA 90274
8	Kenji Ishida		21345 Hawthorne Blvd unit 230 90503
9	Kimiko Kiyohara		1312 W. 169th Pl. Gardena 90247
10	Kent Carter		20621 Manvel Ave Torrance 90503
11	Jane S. Borthwick		19905 Entreat Ave 90503
12	John F Borthwick		19905 Entreat Ave 90503
13	Robert Ciccio		212 S. Holliston Ave R.B. 90503
14	Shirley Narimah		1621 W. 184th ST Gardena 90248
15	Pamela C. Quan		20011 Tomlee Ave Torrance, CA 90503
16	SUSAN ONISHI		20032 Tomlee Ave Torrance, CA 90503
17	Minette A. Calderon		20029 Tomlee Ave Torrance 90503
18	Monique Filips		20342 Perkins Ave 90503
19	Craig Park		6603 Macafee Rd 90505
20	Junko Morinaga		2845 Winlock Rd. 90505
21	Steven Park		4603 MACAFEE RD 90505
22	Darcy Ogata		4227 Calle Mayor, 90505
23	Steve Nagata		2522 6023 Cnd 90503
24	Rachel Noguera		2522 W. 272th ST TORRANCE
25	Sharon Csato		16919 S. Hoover St 90247

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	First Name	Last Name	Signature	Address
1	Graham	Nishida		5501 ARVADA ST. TORRANCE 90503
2	Cecilia	Raju		19915 Redbeam Ave. Torrance 90503
3	Kenneth	Holte		5505 ARVADA ST TORRANCE 90503
4	David	Holmes		5511 ARVADA ST Torrance 90503
5	Glenn	Barny		5515 ARVADA ST. Torrance 90503
6	Lisa	Barry		5515 Arvada St Torrance 90503
7	MATT	METHEGAN		52525 ARVADA ST TORRANCE 90503
8	GLENN	STELLO		5527 ARVADA ST, TORRANCE 90503
9	Byron	Richardson		5510 Arvada St, Torrance 90503
10	Judy	Vosburg		5510 Arvada St Torrance 90503
11	Samuel	McCallum		5502 Arvada St Torrance 90503
12	JIM	SHOCKLEY		5413 Tower St 90503
13	Susan	Tatilian		5504 Arvada St 90503
14	Robert	Tatilian		5504 ARVADA ST #90503
15	DIANA	LOCK		5104 DEELANE ST, TORRANCE CA 90503
16	GEORGE	TEO		5104 DEELANE ST TORRANCE CA 90503
17	Julie	Sair		5305 Onyx St Torrance CA 90503
18	JAY	JAIK		5305 ONYX ST, TORRANCE, CA 90503
19	Jeanne	Riggins		523 N. MANA #B Redondo 90277
20	VINAY	RAJU		19915 Redbeam Ave., Torrance CA 90503
21	Insuan	Chen		2223 Voorhees Ave. #B Redondo Beach
22	Mary	Wong		4804 Macafee Rd, Torrance 90505
23	Iris	Qin		2602 Matthews Ave Redondo Beach 90278
24	Lisa	Dodge		1020 Torrance Blvd Redondo Beach 90277
25	VIVIAN	CHU		443 N. prospect Redondo Beach 90277

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First Name	Last Name	Signature	Address
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- 1 LISA FALK Lisa Falk 120 S. Juanita Ave #5 RB 90277
- 2 Rosemary Vullo Rosemary Vullo 4033 Via Valmonte PVE 90274
- 3 FRANCIE HOPE Fran Hope 4907 Scott St TDA 90503
- 4 LEE COLLIER Lee Collier 715 N. Prospect Ave 90277
- 5 Linda Marland Linda Marland 5102 Paseo del Paven 90505
- 6 DENNIS GEART Dennis Geart 450 N. Paulina RB 90277
- 7 SANDRA BARTIROMO Sandra Bartiromo 68 20th St Hermosa 90254
- 8 Hannah Davies Hannah Davies 5524 Towers St. Torrance 90503
- 9 Tom Pelton Tom Pelton 2601 Gates Ave #A RB 90278
- 10 Glen Thompson Glen Thompson 4322 W. 173 St Torrance 90504
- 11 Lynnette Varner Lynnette Varner 428 N Maria RB 90277
- 12 GREGORY VARNER Gregory M Varner 428 N Maria Ave RB 90277
- 13 Vicki Callahan Vicki Callahan 626 So. PCH #D RB 90277
- 14 Byron Porter Byron Porter 626 So. PCH #C RB 90277
- 15 Joe Vullo Joe Vullo 4033 Via Valmonte PVE
- 16 Pat Light Pat Light 602 B South Broadway, RB 90277
- 17 JERRY MARTIN Jerry Martin 1234 #112 Hermosa Beach 90254
- 18 NOREDA MARTIN Nora Martin 1234 11th St Hermosa Beach, CA 90254
- 19 KARI A. KEDSER Kari A. Kedser 5018 Elmdale Dr, RHB, CA 90274
- 20 Kari Kedser Kari Kedser 409 Via La Selva RB 90277
- 21 RD Whilden RD Whilden 106 S. Poinsettia Ave Man. Beh 90266
- 22 Nelaire Whilden Nelaire Whilden 106 S. Poinsettia Ave Man Beh 90266
- 23 Caryn Ziel Caryn Ziel 2760 ORANGE ST Torrance CA 90503
- 24 William Ziel William Ziel 2760 Orange St Torrance CA 90503
- 25 Dennis Friedman Dennis Friedman 21075 Tomilee Ave, Torrance 90503



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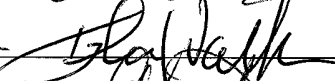

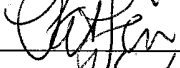

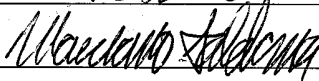
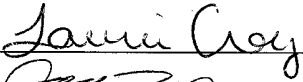

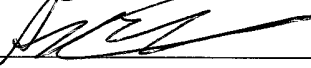

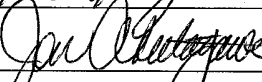
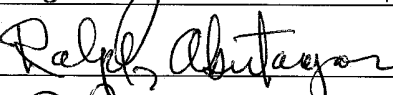

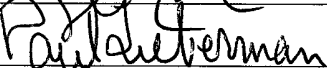
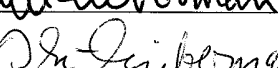
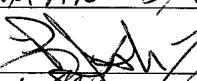
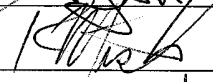
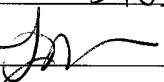
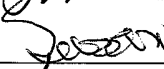

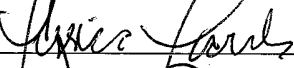
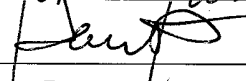
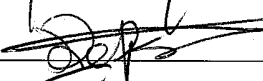

- 1 Emma LAZAVI *Emma Lazavi* 19704 RONALD AVE, TORRANCE 90503
- 2 ~~MARC~~ LAZAVI *Marc Lazavi* 19704 RONALD AVE, TORRANCE 90503
- 3 Kenny Kelso *Kenny Kelso* 19304 RONALD AVE TORRANCE
- 4 RIGER SANCHEZ *Riger Sanchez* 19202 RONALD AVE TORRANCE
- 5 Theodore A Bonger *Theodore A Bonger* 19209 Ronald Ave Torrance
- 6 Hayda Rowe *Hayda Rowe* 19215 Ronald Ave Torrance (A 90503)
- 7 Janet Smolke *Janet Smolke* 19215 Ronald Ave Torrance 90503
- 8 Dale Smolke *Dale Smolke* 19215 Ronald Ave Torrance 90503
- 9 Noel Donofrio *Noel Donofrio* 19217 Ronald Ave Torrance 90503
- 10 Debra Corwin *Debra Corwin* 4716 Butoon St Torrance 90503
- 11 Libby Stuchland *Libby Stuchland* 25117 Amic Ave #2 Torrance 90503
- 12 Elisabeth Hinchley *Elisabeth Hinchley* 3115 Broadway A RB 90277
- 13 ELLIS TORRESSI *Ellis Torressi* 100 Grand Inb 90254
- 14 ERLINDA DEZA *Erlinda Deza* 7520 Via del Monte, PUEB
- 15 Jutta Martorano *Jutta Martorano* 1606 Stanford RB
- 16 WARREN GEE 19510 DONORA AVE Warr Ave Torrance 90503
- 17 Allison Phillips ~~to WHITES~~ *Allison Phillips* 6444 E Spring Suite 877 90815
- 18 Richard W. Murphy 1722 Wallacott ST. R.B. Richard W Murphy
- 19 Celeste Townsend 509 Esplanade #F RB Celeste y Ockel
- 20 Robert C. Warrcholar *Robert C. Warrcholar* 626 N MAIA AVE, R.B.
- 21 Dennis Long *Dennis Long* 575 Esplanade R.B.
- 22 CARRIE WONG *Carrie Wong* 5525 LOTNA ST., TORRANCE
- 23 Jennifer Rothberg *Jennifer Rothberg* 5518 Towers St, Torrance
- 24 WALTON KRAUSE *Walton Krause* 5504 TOWERS TORR.
- 25 MAUREEN PRIOR 5414 TOWERS ST. TORRANCE 90503 *Maureen Prior*

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	First Name	Last Name	Signature	Address
1	Forest	Walker		21712 Reynolds Dr
2	Tyler	Walker		21712 REYNOLDS DR, TORRANCE
3	Emi	Munekata		5016 Lillian St. 90503
4	Pat	Lewis		5502 Laurette St Torrance 90503
5	ARRES	KHANI		5674 TOWLES ST 90503
6	Marciano	Saldana		22013 Ocean Ave, Torrance, CA 90503
7	Laurie	Craig		220 5211 Lee St Torrance 90503
8	Jody	Chan		4555 Talisman St. Torrance 90503
9	Sean	Alcutagawa		1602 W 218th St Torrance, CA 90501
10	Ken	AKutagawa		1143 Stanford Ave. Redondo Beach Cal. 90278
11	Jon	AKutagawa		3909 W. 184th Pl Torrance CA
12	Ralph	AKutagawa		1143 STANFORD AVE R.B. CA
13	Stephanie	Orpilla		5650 Avix Ct. Torrance CA 90503
14	Paul	Lieberman		19815 Mildred Ave, Torrance 90503
15	ILSE-M.	LIEBERMAN		19815 MILDRED AVE, TORRANCE 90503
16	Pamela	Mish		3905 W 184th Place, Torrance 90504
17	Richard	Mish		3905 W 184th Place, Torrance 90504
18	Lindsay	Jaime		901 Heron Rd St. #53 90274
19	Susan	Collins		21521 Silver St. #313 BHB
20	Julia	Wade		8635 Somerset Blvd Paramount CA 90723
21	Jessica	Jackson		8635 Somerset Blvd Paramount CA 90723
22	James	Fiegl		1710 Esplanade RB 90277
23	Donna	Epstein		3610 West Estates Lane #E Rolling Estates, CA 90274
24	Tim	Hogan		937 Highway Ave
25				Marina Tim BCH

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First Name	Last Name	Signature	Address
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- 1 Linda Choy Linda 19426 Redbeam Ave 90503
- 2 Steven Saber Steven 5607 Towers St Torrance 90503
- 3 Edward Arnn Edward J Arnn 19432 Redbeam Ave, Torrance 90503
- 4 John Arnn John Arnn " " " " "
- 5 JULIAN ZAWLOCKI Julian 19940 RED BEAM
- 6 MARTA RUBLE Marta T. RUBLE TORR. 90503
- 7 Donna Miodowski Donna Miodowski 19710 Redbeam Ave Torrance 90503
- 8 Frank & Rosalba Layaola 19934 Redbeam Ave Torrance 90503
- 9 NEIL MINAMI 19814 Redbeam Ave Torrance CA 90503
- 10 Barbara Miramie Barbara Miramie 19814 Redbeam Ave Torrance 90503
- 11 Barbara Smith Barbara Smith 22334 Kathryn Ave Torrance 90505
- 12 YVONNE MINER Yvonne 22334 KATHRYN AVE TORRANCE 90505
- 13 Theodore Sato Theodore Sato 19802 Redbeam Ave Torrance 90503
- 14 Arya Saffaire Arya 19718 Redbeam Ave 90503
- 15 Patricia Feliciano Patricia 19718 Redbeam Ave 90503
- 16 Todd Terlecki Todd 19909 Redbeam Ave 90503
- 17 JOHN HERMANNE John 19811 Ronald Ave 90503
- 18 Julie Hernandez Julie 19811 Ronald Ave 90503
- 19 Vanessa Hernandez Vanessa 19811 Ronald Ave Torrance 90503
- 20 Gerald Geier Gerald Geier 19711 Ronald Ave Torrance 90503
- 21 David Reiman David Reiman 5519 Arroyo St Torrance 90503
- 22 Mona Rusch Mona Rusch 19617 Ronald Ave Torrance 90503
- 23 Ashley Fontes Ashley Fontes 1817 Grant Ave, Redondo Beach, CA
- 24 Burt & Mary Fleming 524 Pauline R. M 90211 90211
- 25 Nadine Gutierrez Nadine Gutierrez 724 N Guadalupe Ave RB 90211

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First Name	Last Name	Signature	Address
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- |    |           |              |  |
|----|-----------|--------------|--|
| 1  | Shuling   | Endreac      | 271 Plaza Del Amore Torrance CA 90503          |
| 2  | Jerry     | Smith        | 4709 Ave B Torrance                            |
| 3  |           |              |  |
| 4  | INGRID    | KIM          | 3103 W 234 <sup>th</sup> Pl Torrance, CA 90505 |
| 5  | Andy      | Irie         | 21729 Barbara St. Torrance CA 90508            |
| 6  | Paula     | Kozinski     | 2270 West 230th Place Torrance, CA 90501       |
| 7  | Linda     | Wilson-Coray | 2443 Andreo Ave Torrance 90501                 |
| 8  | Shirley   | Arai         | 3418 W 225th St Torrance 90505                 |
| 9  | Norma     | Ishigo       | 21209 Budding Ave, Torrance 90502              |
| 10 | DORIS S.  | ENDO         | 24118 ALLIENE AVE, LOMITA 90717                |
| 11 | Jolene    | Ishiguro     | 1330 W. 146 St., Gardena, Ca 90247             |
| 12 | Joy       | Mejia        | 15900 La Salle Ave, Gardena 90247              |
| 13 | Alice     | Yuge         | 18417 Raymond Ave., Gardena, CA 90248          |
| 14 | NEELEY    | WATKINS      | 16425 TAYLOR Ct, TORRANCE, CA 90504            |
| 15 | Jodi      | Morioka      | 4516 Toucan St Torrance, CA 90503              |
| 16 | Jennifer  | Podoll       | 3102 Dow Ave. R.B. Ca - 90278                  |
| 17 | GEORGE    | ALLEN        | 14980 WOODLAND AVE GARDENA CA 90249            |
| 18 | Rico      | Salas        | " "  |
| 19 | Rafael    | Rodriguez    | 11514 Willowbrook Ave LA 90039                 |
| 20 | Harry     | Fleming      | 614 Beryl St Redondo Beach                     |
| 21 | Francisco | Imonge       | 610 S BR04 LWAY Unit A Redondo Beach CA 90277  |
| 22 | MARK      | KNOX         | 21430 Ladeene Ave TORRANCE CA 90503            |
| 23 | KAY       | KNOX         | 21430 Ladeene Av Torrance 90503                |
| 24 | SARA      | BURNS        | 700 Esplanade #28 REDONDO BEACH CA 90277       |
| 25 | Michael   | Martin       | 700 Esplanade #21 Redondo Beach CA 90277       |

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- |    |            |              |  |
|----|------------|--------------|--|
| 1  | WISNUK     | BAMBA        | 414 N LUCIA AVE, Redondo Beach 90277     |
| 2  | WUPA       | BAMBA        | 414 N LUCIA AVE RD. Beach 90277          |
| 3  | Alexis     | Israel       | 410 N. Lucia Ave. Rd. Beach 90277        |
| 4  | Kristopher | Hamstreet    | 518 N. Lucia Ave Redondo Beach 90277     |
| 5  | HOWARD     | TRIPPY       | 516 N LUCIA AVE REDONDO BEACH, CA 90277  |
| 6  | Connie     | Trippy       | 516 N Lucia Redondo Bch 90277            |
| 7  | Avery      | Snyder       | 509 N LUCIA AVE Redondo Beach 90277      |
| 8  | AAAD       | ISRAEL       | 416 N LUCIA AVE R.B 90277                |
| 9  | Julie      | Magallanes   | 407 N. LUCIA AVE RB 90277                |
| 10 | KERRY      | MCNAM        | 405 N. LUCIA AVE. 90277                  |
| 11 | DANNY      | RIEDEL       | 403 N. LUCIA AVE 90277                   |
| 12 | LESLIE     | KINNEY       | 401 N LUCIA 90277                        |
| 13 | Mary       | Watkins      | 401 N LUCIA 90277                        |
| 14 | Bryan      | Lynch        | 404 N LUCIA 90277                        |
| 15 | Jason      | A Ross       | 218 N IRENEA Unit B 90277                |
| 16 | Cheribel   | Ross         | 218 N Irene Unit B 90277                 |
| 17 | Michael    | Arakawa      | 412 N. Lucia Ave R.B. CA 90277           |
| 18 | Cheryl     | Tchiv        | 402 N. Lucia Ave RB CA 90277             |
| 19 | Richard    | JAMES        | 400 N Lucia Ave 90277                    |
| 20 | Mary       | Carron James | 400 N Lucia Ave RB 90277                 |
| 21 | Karen      | S. Rawlins   | 1003 Del Amo St. RB 90277                |
| 22 | K. Egli    |              | 1011 Diamond St. Redondo Bch 90277       |
| 23 | John       | Egli         | 1011 DIAMOND ST. REDONDO BEACH, CA 90277 |
| 24 | Wendy      | Bratt        | 501 N LUCIA AVE. Redondo Bch, CA 90277   |
| 25 |            |              | 220 S BROADWAY REDONDO BEACH 90277       |

# PETITION TO DEMAND BEACH CITIES HEALTH DISTRICT NOT BUILD THEIR PROPOSED "HEALTHY LIVING CAMPUS"

To the Honorable Albert Y. Muratsuchi, Assemblymember, 66th Assembly District, and to All Other Interested Elected Officials and Parties:

**We**, the undersigned registered voters in your district, are vehemently opposed to the proposed Beach Cities Health District (BCHD) plan to demolish the Beach Cities Health Center in order to build a high-density, \$530M, 420+ unit, assisted living facility over the next 15 years, and petition you to act in your constituents' interests as follows:

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- Introduce legislation to change the BCHD "design build" waiver to the "design bid" protection usually afforded to citizens.
- Introduce legislation clarifying that the "project" is beyond the scope of the intent of a health district.

	First Name	Last Name	Signature	Address
1	Randy	Quan		20011 Tonlake Ave, Torrance
2	Edmund	Rose		5631 Alrix Court, Torrance, CA
3	Judy	Garcia		2116 Wayfield Ave #A R.B. CA
4	Beth	Hilbing		2318 Marshallfield Ln A RDB CA
5	JAMES	HILBING		2318 MARSHALLFIELD Ln A PB CA
6	Jay	Bichanich		20005 Tonlake Ave Torrance CA
7	Tim	Thompson		19717 Ronald Ave Torrance CA
8	Jan	Minerud		19611 Ronald Ave Torrance CA
9	RETO	FUSSAWA		19605 RONALD AVE, TORR, CA 90503
10	Nga	Nguyen		19605 Ronald Ave, 90503
11	Simon	Ma		19517 Ronald Ave Torrance
12	Ali	Khan		19317 Ronald Ave Torrance 90503
13	Kellie	Delator		2805 Armar Ln RB. CA 9070
14	Melinda	Waters		628 Ave A
15	MARK	Kuzma		524 n. Juanita ave
16	Dayna	Hebert		2807 May Ave RB
17	Scott	Brake		201 Broadway, Redondo Beach
18	Emily	Feld		201 Broadway Redondo Beach
19	Sichna	Ythuriaga		4105 Scott St.
20	ERIC	LANE		1302 AMETHYST ST.
21	SUSAN	KAT		322 MARKET ST URBICE, CA
22	Kensuke	Bravce		1418 Madrid Ave Torrance 90501
23	Katey	Tyksinski		4115 Artesia Blvd Torrance CA
24	Rebecca	Nelson		1103 Lomax Lane RB, CA
25	Christian	Lomi		2686 Clorellen St. Torrance 90505

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- Introduce legislation clarifying that the "project" is beyond the scope of the intent of a health district.

First Name	Last Name	Signature	Address
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- 1 Marilyn J. Myraie 445 N. Paulina Ave R.B.
- 2 Raymond Stefan Raymond Stefan 443, N Paulina RB Cal.
- 3 Beverly J. Stefan Beverly J. Stefan 443 N Paulina RB
- 4 Mark Doykos. Mark 441 N. Paulina Ave. Redondo Bch.
- 5 JONEY HOWARD ID 437 N. Paulina Ave. RB 90277
- 6 JAMES Todd James Todd 435 N. PAULINA AVE RB 90277
- 7 ALLYSON BAILEY-Todd Allyson Bailey-Todd 435 N. Paulina Ave RB
- 8 Theodore Vaughan Teddy Vaughan 433 N. Paulina Avenue RB 90277
- 9 Robert V. SARKA R.V. Sarka 431 N. Paulina Ave 90277
- 10 Tania Prince 432 N. Paulina Ave. Redondo Beach CA 90277
- 11 FRANK SELTERS 427 N. PAULINA AVE RB 90277
- 12 Marty Jo McGrath 417 N. Paulina RB CA
- 13 Steven Core 418 N - Paulina Ave, RB CA
- 14 Teresa Core 418 N. Paulina Ave, RB CA
- 15 JACK KNICK-ROCKER 409 N. Paulina Ave.
- 16 Kat McLead Kathy McLead 403 N Paulina Ave
- 17 CRISTINA Smoel 401 N. PAULINA AVE.
- 18 ASHLEY LAMM AL 408 N. Paulina Ave
- 19 Ana Arango 400 N. Paulina Ave R.B. CA
- 20 Off Volo 406 N. PAULINA AVE R.B. CA
- 21 Reiko Ujiki RL 410 N Paulina Ave R.B CA
- 22 HANN TIRAZIRI 422 N Paulina Ave RB CA
- 23 GISELA Uhler 424 N. Paulina Ave.
- 24 Mindi Toback 514 N. Maria Ave RB CA 90277
- 25 Phemie L. Parrie R 434 N. Paulina Ave R.B. CA 90277



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First Name	Last Name	Signature	Address
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|----|-----------|-------------|--|
| 1  | Donna     | Miodovsk    | DMiodovsk 19710 Redbeam Ave Torrance 90503                         |
| 2  | JEANNE    | FISHER      | Jeanne Fisher 5306 Calle de Ricardo Tor. 90505                     |
| 3  | Kathryn   | Stryker     | 19440 Sturges Drive, Torrance 90503                                |
| 4  | Virginia  | Rittersmann | 19440 Sturges Drive Torrance 90503                                 |
| 5  | Carol     | Rich        | Carol Rich 432 PACOS VERDES BLVD R.B. 90277                        |
| 6  | DIANA JO  | GIEBLER     | Diana Giebler 104 So. PROSPECT AV #D, RB 90277                     |
| 7  | CLARE     | BROWN       | Clare Brown 4752 Steele St Torrance CA 90503                       |
| 8  | CAROL     | HOLMES      | Carol Holmes 4756 Steele St Torrance CA 90503                      |
| 9  | ROBERT M  | LOONEY      | Robert M Looney 2359 W. 231 <sup>ST</sup> ST, TORRANCE, CA 90501   |
| 10 | JUDY      | PANG        | Judy Pang 4032 Via Gavilan PVE 90274                               |
| 11 | LIBBY     | PERRY       | Libby Perry 4812 Del Amo Blvd Apt #1 TORRANCE CA 90503             |
| 12 | JACK      | CHAPMAN     | Jack Chapman 213 AVE C. RB. 90277                                  |
| 13 | Alba      | Lantor      | Alba Lantor 5530 W. 190 <sup>TH</sup> ST #108, CA, Torrance, 90503 |
| 14 | STACI     | KANESHIRO   | Staci Kaneshiro 106 N. PROSPECT AVE #1 REDONDO BEACH CA 90277      |
| 15 | Tamara    | Canady      | Tamara Canady 727 W. Crestwood San Pedro, CA 90731                 |
| 16 | Stephanie | Wilhelm     | Stephanie Wilhelm 2401 Stead Court Lomita, CA 90717                |
| 17 | Jon Mark  | Ventura     | Jon Mark Ventura 21231 Millpoint Ave Carson CA 90745               |
| 18 | Tamara    | Spene       | Tamara Spene 3285 Skyport Dr. Torrance CA 90505                    |
| 19 | Lester    | Solomon     | Lester Solomon 175 E. Clarion Dr Carson CA 90745                   |
| 20 | Dorothy   | Wunsch      | Dorothy Wunsch 812 Camino Real #102 R.B. 90277                     |
| 21 | Deborah   | Hoskins     | Deborah Hoskins 20112 Mayfield Avenue Torrance CA                  |
| 22 |           |             |  |
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# PETITION TO DEMAND BEACH CITIES HEALTH DISTRICT NOT BUILD THEIR PROPOSED "HEALTHY LIVING CAMPUS"

To the Honorable Albert Y. Muratsuchi, Assemblymember, 66th Assembly District, and to All Other Interested Elected Officials and Parties:

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	First Name	Last Name	Signature	Address
1	Vicki	Saber	Vicki H. Saber	5607 Towers St, Torrance
2	Albert	Dawson	Albert Dawson	5615 Towers St. Torrance
3	Dab-Wei	Duan	Dab-Wei Duan	5621 Towers St. Torrance
4	Sherry	Hsieh	Sherry Hsieh	5621 Towers St Torrance
5	JAMES K.	McDONALD	James K. McDonald	5628 Towers St Torrance 90502
6	JANIS	Vogt	Janis Vogt	5635 Towers ST. Torrance 90503
7	SCOTT	Vogt	Scott Vogt	5635 Towers St. Torrance, CA 90503
8	Robin	Archart	Robin Archart	5649 Towers St. Torrance CA 90503
9	Alan	Archart	Alan Archart	5649 Towers St., Torrance, CA 90503
10	CARL	PAQUETTE	Carl Paquette	5656 TOWERS STREET TORRANCE 90503
11	Genevieve	Paquette	Genevieve Paquette	5656 Towers Street Torrance 90503
12	Nancy	Staffieri	Nancy Staffieri	19302 Tomlee Ave Torr 90503
13	David	Staffieri	David Staffieri	19302 Tomlee Ave Torr 90503
14	ANN	CHEUNG	Ann Cheung	19301 TOMLEE AVE. TORR 90503
15	PHILIP	Wu	Philip S. Wu	19409 MILDRED AVE. TORR. 90503
16	Annie	Wu	Annie Wu	230 The Village, Unit # 304, Redondo Beach 90503 90277
17	ALICE	Wu	Alice Wu	19409 MILDRED AV TORRANCE 90503
18	AUISON	WU	Auison Wu	19409 Mildred Ave. Torrance, CA 90503
19	AMOS	CHEUNG	Amos Cheung	23216 Maple Ave 90505
20	AMITA	CHEUNG	Amita Cheung	23216 Maple Ave. Torrance. 90505
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PETITION TO DEMAND BEACH CITIES HEALTH DISTRICT NOT BUILD THEIR PROPOSED "HEALTHY LIVING CAMPUS"

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First Name	Last Name	Signature	Address
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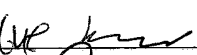
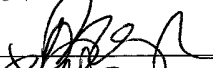
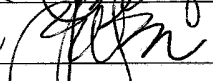
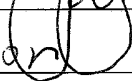
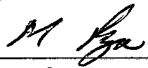
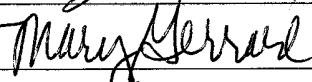

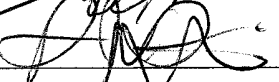
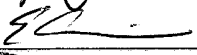
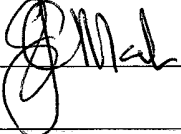
1	James	Ecklund	20124 Wayne Ave. Torrance CA
2	Stefan	Ecklund	20124 Wayne Ave. Torrance CA
3	RICHARD	MAEDA	20029 WAYNE AVE TORRANCE CA
4	David	No	3302 Norton St. Torrance, CA
5	Courtney	Sutton	5412 Norton St. Torrance, CA 90503
6	Jason	Cain	20116 Wayne Ave Torrance CA 90503
7	South	Sharmen	20117 Wayne Ave Torrance CA 90503
8	GARY	SHARMAN	20117 WAYNE AVE TORRANCE CA 90503
9	EVINA	CHARLES	20125 Wayne Ave Torrance CA
10	Han	Lee	20121 Wayne Ave Torrance 90503
11	CHRISTOPHER	DREIKE	4602 CARMELYN ST. TORRANCE, CA 90503
12	Melanie	Dreike	4602 Carmelynn St. Torrance, CA 90503
13	Pete	Zak	20120 Wayne Ave. Torrance, CA 90503
14	Melissa	Walfinger	20120 Wayne Ave Torrance 90503
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	First Name	Last Name	Signature	Address
1	Jonathan	Lhotter		1229 Amethyst St Redondo Beach
2	Marcus	Felt		1223 AMETHYST ST RED B
3	MYRNA	ANDERSON		1223 AMETHYST RB
4	Dan	Roepe		1226 Amethyst #A RB
5	Leesa	Roepe		1226 Amethyst #A RB
6	Simona	Wilson		1306 Amethyst 4 RB
7	Mike	Raza		1314 Amethyst
8	Mary	Gerrard		1316 Amethyst St RB
9				1316 Amethyst St RB
10	ROBIN	WALKER		1326 AMETHYST ST. RB
11	Ed	CANCINO		1327 Amethyst St RB
12	STEVE	MAHER		1321 AMETHYST ST #A - REDONDO BEACH
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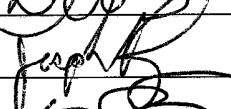

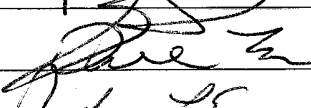
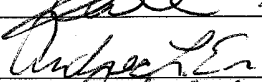

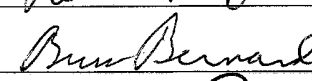
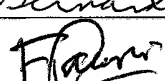
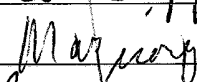
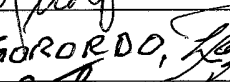

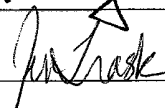
## PETITION TO DEMAND BEACH CITIES HEALTH DISTRICT NOT BUILD THEIR PROPOSED "HEALTHY LIVING CAMPUS"

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First Name	Last Name	Signature	Address
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- |    |                 |   |  |
|----|-----------------|---|--|
| 1  | Delia Vechi     |   | 521 N. LUCIA AVE, REDONDO BCH 9027         |
| 2  | Joe Ruymen      |   | 519 IV Lucia Ave Redondo Bch 9027          |
| 3  | Eric Ruymen     |  | 519 N Lucia Ave Redondo Bch 9027           |
| 4  | OWEN EVANS      |  | 526 N. LUCIA AVE REDONDO Bch 9027          |
| 5  | Andrea Evans    |  | 526 N. Lucia ave RB 90277                  |
| 6  | Paul Austard    |  | 524 N Lucia Ave RB 90277                   |
| 7  | Bruce Bernard   |  | 712 Elvira Ave #B, Redondo Beach, CA 90277 |
| 8  | Fernando Paludi |  | 815 S. Juanita Ave RB Ca 90277             |
| 9  | Mary Juárez     |  | 19427 Linda Dr, Tor 90503                  |
| 10 | Luis M. GORDO   |  | 2003 NELSON AVE #5, R.B. 90278             |
| 11 | ROMINA GARISTO  |  | 1714 HARRIMAN W #1 R.B. CA 90278           |
| 12 | Jennifer Trask  |  | 523 N Lucia ave #A RB 90277                |
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	First Name	Last Name	Signature	Address
1	PAUL	WRIGHT	<i>Paul Wright</i>	434 N. PROSPECT AVE.
2	Tana	Bell	<i>Tana Bell</i>	424 N. Prospect Ave.
3	Bart	Bogust	<i>Bart Bogust</i>	448 N. Prospect Ave
4	ADREW	BOGUST	<i>Andrew Bogust</i>	448 N. PROSPECT AVE.
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First Name	Last Name	Signature	Address
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1	William	Brinkley	1904 Diamond St Redondo Beach
2	Geoffrey	Gilbert	1406 Diamond St. Redondo Beach 90277
3	Philip	De Wolf	1408 Diamond St Redondo Beach 90277
4	Margaret	J. McKenzie	1408 Diamond St. Redondo Beach CA 90277
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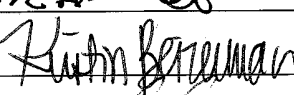
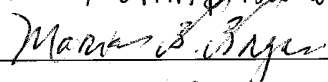
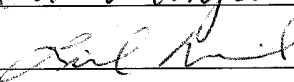
PETITION TO DEMAND BEACH CITIES HEALTH DISTRICT NOT BUILD THEIR PROPOSED "HEALTHY LIVING CAMPUS"

To the Honorable Albert Y. Muratsuchi, Assemblymember, 66th Assembly District, and to All Other Interested Elected Officials and Parties:

We, the undersigned registered voters in your district, are vehemently opposed to the proposed Beach Cities Health District (BCHD) plan to demolish the Beach Cities Health Center in order to build a high-density, \$530M, 420+ unit, assisted living facility over the next 15 years, and petition you to act in your constituents' interests as follows:

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- Introduce legislation clarifying that the "project" is beyond the scope of the intent of a health district.

First Name	Last Name	Signature	Address
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1	ROBERT CHRISTENSEN		449 ALTURA WAY MANHATTAN BEACH CA
2	Kristin Beizerman		2217 Mathews Ave #C Redondo Bch
3	MARI B. BRYAN		613 N Prospect Ave. R.B.
4	LINDA MARILL		426 N PROSPECT AVE RB
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# PETITION TO DEMAND BEACH CITIES HEALTH DISTRICT NOT BUILD THEIR PROPOSED "HEALTHY LIVING CAMPUS"

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First Name	Last Name	Signature	Address
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- |    |                      |                      |                                       |
|----|----------------------|----------------------|---------------------------------------|
| 1  | Mary Eninger         | Mary Eninger         | 5609 Andrews Ave. Torrance 90503      |
| 2  | Joan Hardy           | Joan J. Hardy        | 19616 Redbeam Ave. Torrance 90503     |
| 3  | Janice Kroll         | Don Kroll            | 120 34th St, Manhattan Bch, CA 90266  |
| 4  | Patricia L. Brown    | Patricia L. Brown    | 507 Cluster Ln. Redondo Bch. 90278    |
| 5  | Maren Blyth          | Maren Blyth          | 618 Longfellow Ave Hermosa Bch 90254  |
| 6  | PURWADI GANI         | Gani Purwadi         | 20014 MILDRED AVE TORRANCE CA 90503   |
| 7  | CYNTHIA PURWADI      | Cynthia Purwadi      | 20014 MILDRED AVE TORRANCE CA 90503   |
| 8  | Richard Matsui       | Richard Matsui       | 19903 Tomlee Ave Torrance, CA 90503   |
| 9  | Elfreda Pok          | Elfreda Pok          | 19936 Tomlee Ave Tor. 90503           |
| 10 | MARIA FUNK           | Maria Funk           | 5016 ONYX ST TORRANCE, CA 90503       |
| 11 | LINDA CABIBBO        | Linda Cabibbo        | 409 N. PCH #471 R.B 90277             |
| 12 | Patricia Burschinger | Patricia Burschinger | 411 N. Pacific Redondo Beach 90277 CA |
| 13 | CAROL A. MCGARRY     | Carol A. McGarry     | 523 N. PROSPECT AV. RB, 90277         |
| 14 | Karen Robinson       | Karen Robinson       | 5534 Konyo Dr. Torr. 90503            |
| 15 | RAYMOND E. ROBINSON  | Raymond E. Robinson  | 5534 KONYO DR TORR 90503              |
| 16 | PATRICIA G. MILLER   | Patricia G. Miller   | 4912 Garnet St Tor, 90503             |
| 17 | BEVERLY MARTINO      | Beverly Martino      | 20116 Santee Ave Tor 90503            |
| 18 | DYMPNA NAUGHTON      | Dympna Naughton      | 125 West Beryl #308 Redondo Bch 90241 |
| 19 | MARILYN WEICK        | Marilyn Weick        | 20536 VISTA DR. TORRANCE 90503        |
| 20 | Dolores J. Campos    | Dolores J. Campos    | 20603 ENTRADERO TORRANCE 90503        |
| 21 | JULIE A. CAMPOS      | Julie A. Campos      | 20603 Entradero Ave Torrance 90503    |
| 22 | Gayle Tons           | Gayle A. Tons        | 19903 Redbeam Ave Torrance 90503      |
| 23 | Donna Monette        | Donna Monette        | 19929 Redbeam Ave TOR 90503           |
| 24 | Julian Zawlocki      | JULIAN ZAWLOCKI      | 19940 REDBEAM AV.                     |
| 25 | Marcia Gehr          | MARCIA GEHR          | 19935 REDBEAM AVE                     |

# 

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First Name	Last Name	Signature	Address
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- DAVID YICK 20718 CHRISTINE AVE TORRANCE CA 90503
- Julia Asano 22912 Maple Ave #4 Torrance, CA 90505
- Bonnie Darrow 22304 Kathryn Ave Tor. Ca 90505
- Jim Darrow " " " " " "
- Judy Kato 21345 Hawthorne #417 Torrance CA 90503
- R. Brazee R. Brazee 1748 Montana Ave. Tor. CA. 90501
- Leticia Ramirez 2800 Plaza Del Arroyo #478 Ca 90503
- Susan Palmer S. Palmer 3923 W 182 St 90504
- Kumiko Toyoda 5513 Calle de Arboles 90505
- Edith M Reid 3657 W 171 St, Torrance 90504
- TAYEKO YAMASHIRO J. Y. 20607 Wood Ave. Torrance 90503
- SHARON KUMAGAI 18511 PORMAN TORRANCE 90504
- Paula J. Weiner 21506 Scannel Ave Torrance 90503
- Kajhan Yoshida 3229 Racine Ave Torrance 90505
- Binh Truong 18044 Regina Ave. Tor. 90504
- TAKASHI KATO 21826 FELKER DR. TORR. 90503
- YOSHIKO KATO 20826 Felken Dr. Tor 90503
- ERIC YOSHIDA 1139 W 158TH ST. GARDENA, CA 90247
- TONT YEH 1508 Flomood Ave Torrance CA 90503
- Lisa Aoki 16630 Haas Ave. Torrance, CA 90504
- SIDNEY URATA 18623 ST ANDREWS PL TOR, CA 90504
- Leidre Yonekawa 1924 W. 233rd St. Torrance, CA 90501
- Jen Wu 18904 Palomella Ave Torrance CA 90504
- Maggie Chan 19526 Hingdale Ave. Torrance, CA 90503
- KAREN L. MIYAKO 2741 MARICOPA ST TORRANCE, CA. 90503

# PETITION TO DEMAND BEACH CITIES HEALTH DISTRICT NOT BUILD THEIR PROPOSED "HEALTHY LIVING CAMPUS"

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First Name	Last Name	Signature	Address
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- MAY HOM May Hom 20703 Wendy Dr. Torrance CA 90503
- JUNE/JOHN HOLMAN 20725 CHRISTINE AVE Torrance, Ca. 90503
- Bonnie Stull Bonnie Stull 20719 Wendy Dr. Torrance, CA 90503
- Dorothy Klingler 20702 Wood Ave. Torrance, Ca. 90503
- Sharon Saffer 3622 W. 226 St Torrance, 90505
- Barbara Smith 20733 Christine Torrance 90503
- Nicasia Dickoff 20710 Wendy Dr Torrance 90503
- Raymond Dickoff 20710 Wendy Dr Torrance 90503
- Norman Smith 20733 Christine Ave Torrance 90503
- Adeline Maher 20724 Christine Avenue - Torrance, CA 90503
- Theresa Abbey 5536 Norton St Torrance 90503
- Dean Abbey "
- Shayn Abbey "
- Betty Abbey "
- Rita Kohn 21418 Talisman St Torrance, CA 90503
- Florence KAWAMATA 16611 ARDATH AV Torrance 90504
- Paula Neri 28302 Seamount Dr. Torrance 90875
- Jeffrey Neri 20827 FOND DU LAC RD Rancho R 90275
- MARGARET BALLARD 901 DEEPVAUGHN DR #107 RITE, CA 90274
- Margaret PARTSCH 2414 CRAWEN #221 TORRANCE
- Ellen Tanaka 4930 Calle de Arboles Torrance 90505
- Karen Uemura 1227 W. Bedford St Torrance, CA 90502
- Jane Lam 3101 Plaza Del Amo Ca 90503
- Sosang Noyes 2267 W. 232 St Torrance Ca 90501
- Carol Hadimoti 2267 W. 232 St Torrance Ca 90501

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First Name	Last Name	Signature	Address
1	Rich Nasworthy	[Signature]	22371 Moneta Ave Carson 90745
2	Laura Cervantes	[Signature]	225 N. Lucia Ave Redondo Beach 90278
3	FUSO KEN FINE	[Signature]	1737 Hickory Ave Torrance, 90503
4	ED DAVIDS	[Signature]	40 FAIRWAY DRIVE MATUNIA BEACH CA 90266
5	Boa Escarcega	[Signature]	5317 W 138th PL, Hawthorne, CA
6	David Caceres	[Signature]	10412 Candan Pkhe Torrance 90250
7	Mary Zamagaza	[Signature]	6015 S. Prospect Ave #12B, 90277
8	JOE LOREHAN	[Signature]	6002 3rd St. Torrance Beach 90254
9	ARVIN COLLINS	[Signature]	1521 Silver St Hermosa Beach 90254
10	LYNN VILLORGA	[Signature]	3823 PIRATE DR RAV 90275
11	Richard Peterlin	[Signature]	22206 Dula Ave Torrance 90501
12	Jennifer Peterlin	[Signature]	22206 Dula Ave Torrance - CA 90501
13	Lisa Alemi	[Signature]	1819 Morgan Ln Unit A 90278
14	Farzad Alemi	[Signature]	1819 Morgan Ln Unit A 90278
15	ALISTAIR MULLER	[Signature]	4415 HIGHLAND AVE TORR 90505
16	Christie Diaz	[Signature]	20009 Wayne Ave. Torrance, CA 90503
17	Sindy Kang	[Signature]	20013 Wayne Ave. Torrance 90503
18	ANDREA CUTH	[Signature]	20101 WAYNE AVE. TORRANCE 90503
19	Charlotte A Sappington	[Signature]	5435 Lee St Torrance, Ca 90503
20	SIARASH ETEMADI	[Signature]	10392 Hillside RC 90737. CA
21	Sarah Yamazaki	[Signature]	232 S. Helberta Ave #B RB CA 90277
22	Marcieh Raza	[Signature]	710 Camino Real / R.B. CA 90277
23	SHABAZ RAZA	[Signature]	" "
* 24	Victoria Reynolds	[Signature]	124 S. Irvine #4 Redondo Beach, CA 90277
25	Perla Welch	[Signature]	608 S. Gertruda Ave, Redondo Beach CA 90277

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First Name	Last Name	Signature	Address
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- 1 Kerri Mattson Kerri Mattson 4606 DeLane St
- 2 Don Murphy Don Murphy 19939 Tomilee Ave
- 3 CHERYL OSHIRO Cheryl Oshiro 1325 Granvia Altamira, PVE 90274
- 4 Jane Lee Jane Lee 7021 Beechfield Dr. RPV 90275
- 5 STACEY NOZAKI Stacey Nozaki 1409 VIA GABRIEL, PVE 90274
- 6 KARA KENT Kara Kent 6912 Abbottswood RPV 90275
- 7 Claire Sugiyama Claire Sugiyama 20341 Tom Lee Ave Torrance 90503
- 8 Anna Park Anna Park 28002 San Nicolas Dr RPV 90275
- 9 Frances Kobayashi Frances Kobayashi 21310 Talisman St. Torrance 90503
- 10 Angela Nishimura Angela Nishimura 29610 Stonecrest Rd RPV 90275
- 11 Maria Pawlick Maria Pawlick 2022 W. Crestwood RPV CA 90275
- 12 Tracey Loui Tracey Loui 28120 Peacock Ridge Dr. Apt 204 RPV, CA 90275
- 13 Claudia Meneses Claudia Meneses 40 Santa Rosa Pl. PHE 90274
- 14 THERESA SHIMAMOTO Theresa Shimamoto 2107 W. 176th St, TORRANCE 90504
- 15 JULIA NAKAMOTO Julia Nakamoto 20872 CHESTNUT AVE Torrance 90503
- 16 Phil Chumsido Phil Chumsido 209 N. Duane St Torrance 90277
- 17 DEREK BIRNBAUM Derek Birnbaum 18501 ASHLEY AVE TORRANCE CA 90504
- 18 Marquis Booshee Marquis Booshee 19309 Beckwith Ave Torrance, CA 90503
- 19 Lorraine Chan Lorraine Chan 3407 Newridge Dr. R.P.V 90275
- 20 Patricia Wilby Patricia Wilby 23102 Cataldo Ave, CARSON CA 90745
- 21 WAYNE ISHIMOTO Wayne Ishimoto 26609 ACADEMIC DR, PUP, CA 90274
- 22 Tommy Mayemura Tommy Mayemura 1961 W 230th Street Torrance CA 90501
- 23 Pam Miike Pam Miike 23015 Juniper Ave Torrance CA 90505
- 24 Doris M. Nakakura Doris M. Nakakura 2025 W. 185th St Torrance 90504
- 25 Calvin Schadt Calvin Schadt 5414 W. Ima St Torrance

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First Name	Last Name	Signature	Address	
1	Kathleen	Kathleen	19502 Tomlee Torrance	90503
2	Phil	Phil	19502 Tomlee Torrance	90503
3	Jakob	Jakob	19304 Ronald Ave. Torrance	90503
4	Hailey	Hailey	19433 Tomlee Ave, Torrance	90503
5	JEFF D.	JEFF D.	19433 Tomlee Av Torrance	90503
6	Susan Y.	Susan Y.	19433 Tomlee Ave Torrance	
7	LEE	LEE	102 N. BROADWAY REDONDO	90271
8	Maria	Maria	102 N Broadway Redondo	90277
9	Jorge	Jorge	511 Camino Real R.B	90277
10	Phu	Phu	19313 Entradero Ave Torrance	90503
11	Linh	Linh	19313 Entradero Torrance	90503
12	JANIE E	JANIE E	19510 Tomlee Tor	
13	James	James	19510 Tomlee Ave Torr.	
14	PATRICK	PATRICK	19601 Tomlee Ave	90503
15	Robert T	Robert T	19602 Tomlee	90503
16	MARGARET	MARGARET	19602 Tomlee	90503
17	GLENDH	GLENDH	19616 Tomlee Ave	90503
18	Frank	Frank	19616 Tomlee Ave	90503
19	Kathleen	Kathleen	19615 Tomlee Ave	90503
20	Ramona	Ramona	19402 Mildred	
21	Zak	Zak	19415 Mildred Ave	90503
22	Deborah L.	Deborah L.	21805 Marjorie Ave.	
23			21805 MARJORIE AVE	
24	ADAM	ADAM	1150 TENNYSON ST #37	90266
25	Sandra L	Sandra L	4406 W. 238th St	90505



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First Name	Last Name	Signature	Address
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- 1 Glen H. Yokoe Glen H. Yokoe 19307 Tomlee Ave. Torrance CAL 90503
- 2 Nancy N. Yokoe Nancy Yokoe " " " " "
- 3 William Shanney W Shanney 19313 Tomlee Ave, Torri. 90503
- 4 Vivian Shanney V Shanney 19313 Tomlee Ave " "
- 5 EUGENE KRC Eugen Krc 19319 TOM LEE AVE, TORRANCE 90503
- 6 Sabrina Barakat Sol Bent 19319 Tomlee Avenue, Torrance 90503
- 7 ARNALDO MANGIARANO Arnaldo Mangiarano 19325 TOM LEE TORRANCE 90503
- 8 Lee MANGIARANO Lee Mangiarano 19325 Tomlee Torrance 90503
- 9 Jill Conover Jill Conover 19331 Tomlee Ave Torrance CA 90503
- 10 Sandra Schreyer Sandra Schreyer 19338 Tomlee Ave Torrance CA 90503
- 11 Anthony Skelly Anthony Skelly 19328 Tomlee Ave Torrance 90503
- 12 CAROL SKELLY Carol P. Skelly 19320 Tomlee Ave Torrance 90503
- 13 Kay Nekawata Kay Nekawata 19322 Tom Lee Ave Torrance 90503
- 14 S. G. SAQUE S. G. Saque 19710 ROBERT AVE, Torrance 90503
- 15 ROBERT M. SAQUE Robert M. Saque " " " " "
- 16 Carol Hales Carol Hales 19514 Mildred Ave, Torrance 90503
- 17 CLINTON HALES Clinton Hales 19514 MILDRED AVE. Torrance 90503
- 18 MICHAEL CONOVER Michael Conover 19337 TOM LEE AVE. TORRANCE 90503
- 19 YAU KWAN HO Yau Kwan Ho 19308 TOM LEE AVE Torrance 90503
- 20 ESTHER HO Esther Ho 19308 Tomlee Ave Torri. 90503
- 21 Phil Kiyokane Phil Kiyokane 5641 Towers St. Torra 90503
- 22 Barbara Kiyokane Barbara Kiyokane 5641 Towers St. Torri 90503
- 23 FRANK W. VON COELN Frank W. von Coeln 19331 TOM LEE TORR 90503
- 24 Nancy & L. von Coeln Nancy & L. von Coeln 19331 Tomlee Ave Tor. 90503
- 25 GARY SARIKISIAN Gary L. Sarikisian 19326 Tomlee Ave, Torrance, CA 90503


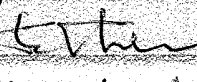



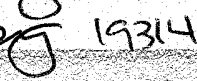
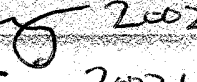
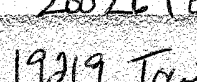
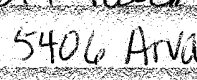
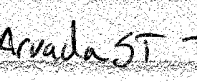
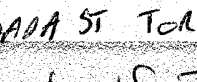

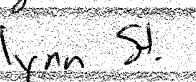
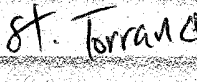
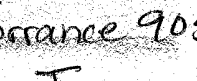
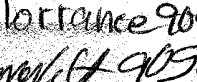
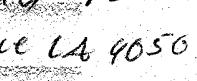
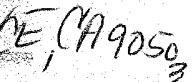
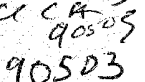




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- Kathleen Chen  19325 Tomlee Ave, Torrance, CA 90503
- Fred S. Chen  19325 Tomlee Torrance CA 90503
- ALAN H. SARKISIAN  19326 Tomlee Avenue, Torrance, CA 90503
- ROBERT LEVY  19314 Tomlee Ave, Torrance CA 90503
- Rachel Levy  19314 Tomlee Ave, Torrance CA 90503
- LuJean Levy  19314 Tomlee Ave, Torrance CA 90503
- Rosie Levy  19314 Tomlee Ave, Torrance CA 90503
- Rita Levy  20026 Tomlee Ave, Torrance CA 90503
- Leon Levy  20026 Tomlee Ave, Torrance CA 90503
- LISA BUSSEY  19219 Towers Ave, Torrance CA 90503
- Karen Bentley  5406 Arvada St. Torr. CA 90503
- BEN McARTHUR  5410 Arvada ST TORRANCE CA 90503
- DEAN MATSUNRA  5506 ARVADA ST TORRANCE CA 90503
- Jennifer Bouna  5103 Carmelynn St Torrance CA 90503
- Marianne Woods  5059 Carmelynn St Torrance CA 90503
- John Westergaard  5111 Carmelynn St. 15 11 15
- Shige Kabashima  5118 Carmelynn St. Torrance 90503
- Katherine Daniels  20117 Donora Ave Torrance 90503
- Mel Daniels  20117 Donora Ave Torrance 90503
- Nabeel Baakht  5114 Patrick St Torrance CA 90503
- Hiroshi Sugimoto  5321 Halison St Torrance CA 90503
- LES + Sharon Congelliere  5318 Halison ST, TORRANCE, CA 90503
- Leslie COPE  5418 Halison, Torrance CA 90503
- Kevin Bunn  5503 Halison St, Torrance 90503

# PETITION TO DEMAND BEACH CITIES HEALTH DISTRICT NOT BUILD THEIR PROPOSED "HEALTHY LIVING CAMPUS"

To the Honorable Albert Y. Muratsuchi, Assemblymember, 66th Assembly District, and to All Other Interested Elected Officials and Parties:

**We**, the undersigned registered voters in your district, are vehemently opposed to the proposed Beach Cities Health District (BCHD) plan to demolish the Beach Cities Health Center in order to build a high-density, \$530M, 420+ unit, assisted living facility over the next 15 years, and petition you to act in your constituents' interests as follows:

- State your opposition to this project.
- Introduce legislation to change the BCHD "design build" waiver to the "design bid" protection usually afforded to citizens.
- Introduce legislation clarifying that the "project" is beyond the scope of the intent of a health district.

First Name	Last Name	Signature	Address
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- 1 Edna montes Edna montes 504 N. Juanita Ave #A
- 2 Scott Witter 506 N. Juanita Ave #A
- 3 LAUREN WITTER 500 N. Juanita Ave #A
- 4 Angela Gonzalez 25835 N. Burbank.
- 5 SANDRA FOLLES 515 N. Juanita Ave. R.B.
- 6 John McPhail 514 N. Juanita Ave #B R.B.
- 7 Dean Stropalski 518 N. Juanita #1 R.B.
- 8 Rosa Martinez 524 N. Juanita #19.
- 9 Yasmine Gonzalez 524 N. Juanita Ave. #2
- 10 Virginia Freschi Virginia Freschi 519 N. Juanita Ave.
- 11 Dave Odoo 517 N. Juanita Ave #2
- 12 Andrea Gamble 507 N. Juanita Ave. #1
- 13 Stefanie Korn 418 N. Lucia Ave, R.B.
- 14 LASZLO GASPAR 418 N. Lucia Ave, R.B.
- 15 William Moreno 412 N. Juanita Ave. R.B.
- 16 Byron W. Filler 417 N. MARIA AVE R.B.
- 17 Michael Biedenbender 425 N. Maria Ave.
- 18 ~~David Ewell~~ 415
- 19 David Ewell 415 N. Maria Ave.
- 20 GREG ZEIL 401 N. MARIA AVE.
- 21 DARLYN MOORE 404 N. Paulina Ave.
- 22 Wayne Tomosa 402 N. Maria Ave.
- 23 Karen Edmonson 408 N. Maria Ave.
- 24 Cathy Cole 412 N. Maria Ave.
- 25 MIKE McPhail 418 MARIA AVE.

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	First Name	Last Name	Signature	Address
1	Vannesa	Naiva		8464 Zamora Ave. LA CA 90021
2	Lupe	Ruan		1015 Mahar Ave Wilmington, CA 90744
3	Silvana	De leon		108 N Prospect Redondo beach 90254 CA 90277
4	Kilana	Gaddis		867 Aubrey Ct Hermosa 90254 CA 90277
5	Hector	Jaramillo		1410 E. Denny St. 90744
6	Dennis	Higley		19716 Linda Dr, Tor 90503
7	Myra	Uyemura		2524 PLAZA DEL AMO Tor 90503
8	Katherine	Kawata		16956 S. Dalton Ave #2, Gardena, CA 90247
9	Racel	De Guzman		16821 Yukon Ave #1, Torrance CA 90503
10	GREG	MAN		5506 TOWERS ST. TORRANCE CA 90503
11	Margie	Inouye		20818 Feller Dr Torrance 90503
12	Sherilyn	Ko		2221 W 231st St Torrance 90501
13	Ramona	Carter		2306 243rd St Comita Calif 90717
14	Richard	Oswin		123 S. CATALINA AVE RB 90277
15	Andrew	Negrete		2423 Fisk Ln #10 Redondo Beach CA, 90278
16	Michael	Lau		20521 Catalina St, Torrance, CA 90502
17	Angela	Quon		6508 Centa Dr. RIV, CA 90275
18	Steven	Lin		24703 Grant Ave Unit 3, Redondo Beach CA
19	Rodney	Sugiyama		20341 Tomlee Ave Torr 90503
20	KEVIN	INOUE		20818 FELKER DR. TORRANCE, CA 90503
21	RANDOLPH	QUON		6508 CENTA DR. RIV CA 90275
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First Name	Last Name	Signature	Address
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1	Ruth Albright	Ruth Albright	4533 Vista Largo Torrance
2	Cheryl Dawson	Cheryl Dawson	4719 Bulova St. Torrance 90503
3	Jeff Dawson	Jeff Dawson	4719 Bulova St. Torrance 90503
4	Laura D. Rubio	[Signature]	PO BOX 6623 TORRANCE 90504
5	Martha Wilson	Martha Wilson	4702 Narrot St. Torrance 90503
6	JAMES WILSON	James Wilson	4702 NARROT ST TORRANCE 90503
7	CHRISTINE KING	[Signature]	4720 Bulova St. Tor 90503
8	Lindsey Nitale	[Signature]	3415 Artega Blvd #11 Tor 90504
9	Luis Vasquez-Ajmal	[Signature]	108 Broadway RB 90277
10	Anita Hernandez	Anita Hernandez	4018 W. 162nd St Lawndale
11	Debra A Sutherland	[Signature]	15326 Pusch Ave Gardena
12	Karen Sharp	[Signature]	3504 Blossom Ln, Redondo Beach CA 90278
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First Name Last Name Signature Address

- 1 Gloria Andoh Gloria Andoh 2300 Maple Ave., #174 Torrance, CA 90503
- 2 Sharm Lazo-Nakamoto Sharm Lazo-Nakamoto 2232 W. 234<sup>th</sup> St. Torrance, CA 90503
- 3 Sachie Okara Sachie Okara 2415 W 236<sup>th</sup> St. Torrance 90501
- 4 Kamaliah Lewis Kamaliah Lewis 22904 Greenwood Ave. Torrance
- 5 Shirley Tanaka Shirley Tanaka 23619 Batey, H.C.
- 6 Joanne Hays Joanne Hays 25034 Eschelman Lomita 90717
- 7 Janice Hays Janice Hays 1419 Beech Ave Torrance 90501
- 8 Bonnie Harrow Bonnie Harrow 22304 Kathryn Ave. Torrance 90505
- 9 Jim Janos Jim Janos 22304 Kathryn Ave. Torrance 90505
- 10 Margorie Sam Margorie Sam 2766 W. Carson St Torrance, 90503
- 11 Roberta Stevenson Roberta Stevenson 22811 Pepper Tree Pl., Torrance 90501
- 12 June Ito June Ito 26827 Fono Du Lac Rd R.P.V. 90275
- 13 Ch. Shikata Ch. Shikata 901 Deeg Valley Rd #107 Torrance 90504
- 14 MAUREEN BAUMANN MAUREEN BAUMANN 901 Deeg Valley Rd #107 Torrance 90504
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First Name	Last Name	Signature	Address
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1	Helen	Shipstad	HShipstad	20415 Wayne Ave, Torrance, CA 90503
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First Name	Last Name	Signature	Address
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|----|--------------|--------------|---|
| 1  | GARY         | DYO          | 19715 TOMLEE AVE. TORRANCE, CA 90503        |
| 2  | Suzanne      | McCune       | 1224 S. Gertruda Ave, Redondo Bch, CA 90277 |
| 3  | Mary Ruth    | Ewell        | 415 N. Maria Ave Redondo Beach 90277-3014   |
| 4  | Heflin Heidi | Heidi        | 409 N. Maria Ave Redondo Beach CA 90277     |
| 5  | ERINIE       | GURMAN       | 409 N. MARIA AVE. REDONDO BEACH CA 90277    |
| 6  | Catherine    | Moloney      | 4510 186th St #104 RB Catherine Moloney     |
| 7  | Albertina    | L. Jaquez    | 4510 186th St. R03 R.B. CA. 90278           |
| 8  | Sandra       | Delwan       | 14645 Stanford Ave TB 90278                 |
| 9  | Lirio        | Baiges       | 4510 186th St RB 90278                      |
| 10 | Gilbert      | Bertz        | 4494 186th St 203 RB 90278                  |
| 11 | Aggie        | Williams     | 4510 186th St. #101 Redondo Beach 90278     |
| 12 | Bette        | J. Valentine | 4506 186th St. #108 Redondo Bch 90278       |
| 13 | Linda        | Gallourel    | 4498 186th St. #112 Redondo Beach           |
| 14 | Judith A.    | Jackson      | 4526-186th St #108 R.B. 90278               |
| 15 | Marie        | Dampson      | 4515 186th St #105 R.B. 90278               |
| 16 | Betty        | Green        | 4510 186th St #103 Redondo Bch 90278        |
| 17 | Angela       | Newland      | 224 N. Prospect Ave Redondo Beach 90277     |
| 18 | Jean         | Bishop       | 411 N Maria RB 90277                        |
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Anya  
Nancy  
Clarke

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First Name	Last Name	Signature	Address
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1	BERNARD	DuBois	Dr (CEN)	513 N Prospect Ave
2	BOBBIE	Gates	Bobbie Gates	513 N Prospect Ave
3	Leo	Montenegro	L Montenegro	529 N. Prospect Ave
4	NANCY	ORCHARD	Nancy Orchard	617 N. PROSPECT AVE.
5	Eric	Orchard	Eric Orchard	617 N. Prospect Ave
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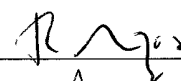
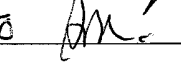
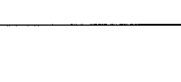
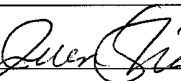
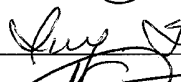

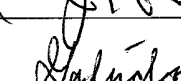
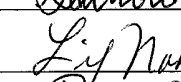
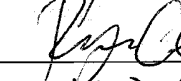

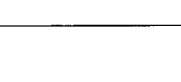
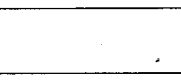
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First Name	Last Name	Signature	Address
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|----|-------------------|---|--|
| 1  | Khalid Samman     |    | 5321 Wilma St. Torrance                    |
| 2  | Robert Lomake     |   | 5110 Patrick St. Torrance 90501            |
| 3  | SALLY MATSUMOTO   |  | 2256 W. 229th St. TORRANCE 90501           |
| 4  | Faye Shigeta      |  | 2114 W. 161st St. Torrance 90504           |
| 5  | Alice Jam         |  | 2434 V 230th St Torrance 90504             |
| 6  | Erene Shimamoto   |  | 2412 250th St LOMITA 90717                 |
| 7  | Lily Toma         |  | 3908 Paseo Delas Tortugas, Torrance, 90505 |
| 8  | MARCIO NAVA       |  | 619 N. PROSPECT AVE RB 90277               |
| 9  | Jennifer Shigeta  |  | 1404 Via Ano Palo Verde Etc CA 90274       |
| 10 | Magdalena Galindo |  | 801 Victor Ave, 90302                      |
| 11 | Lily Nakatani     |  | 2050 W. 184th St, Torrance 90504           |
| 12 | Ryan Colescott    |  | 2419 Voorhes Ave. #A Redondo BICA          |
| 13 | Diane Waters      |  | 2010 Ruhland Ave #1, Redondo Beach 90278   |
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First Name	Last Name	Signature	Address
1	THOMAS MILLER	<i>Thomas Miller</i>	2733 FISK AVE, REDONDO BEACH, CA
2	THOMAS MCGARRY	<i>Thomas McGarry</i>	523 N. PROSPECT AVE R.B., CA
3	JOHN BRISCOE	<i>John Briscoe</i>	23740 HAMPTON TOWNE, CA. SATOT
4	LARRY REED	<i>Larry Reed</i>	2019 HARMON R.B. CA
5	VIRGINIA CORRAD	<i>Virginia Corrad</i>	5501 KONYA DR TORR.
6	MARILYN CONNELL	<i>Marilyn Connell</i>	160 THE VINE G+10 Redondo Beach
7	PAT REED	<i>Pat Reed</i>	23002 MADINE CIR A TORR 90505
8	MARTHA SUECH	<i>Martha Suech</i>	1705 Clark Ln #1. Redondo Bch. 90278
9	BARBARA McLEEN	<i>Barbara McLeen</i>	22935 FILLER TARRINE
10	JAMES KAVANAGH	<i>James Kavanagh</i>	124 N. P.C.H. Redondo Bch. CA. 9027
11	KEENAN CAMERON	<i>Keenan D. Cameron</i>	624 EMERALD ST. REDONDO BEACH
12	CAROL BOERS	<i>Carol Boers</i>	5335 W. 138th STREET NANTUCKET, CA 90250
13	George Floratos	<i>George Floratos</i>	5516 Norton St TORRANCE, 90503
14	Russell Miller	<i>Russell Miller</i>	2315 Ripley Ave. Redondo Beach, CA 90278
15	JERRY BAUER	<i>Jerry Bauer</i>	2702 CURTIS AVE, REDONDO BEACH CA 90278
16	Judith A Bauer	<i>Judith A Bauer</i>	2702 Curtis #B R.B 90278
17	Jamie Bauer	<i>Jamie Bauer</i>	2315 Ripley Ave, Redondo Beach, CA 90278
18	Barbara Barr	<i>Barbara Barr</i>	17038 CURIE AVE, TORRANCE, CA 90504



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First Name	Last Name	Signature	Address
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1	Wayne C. Linn	Wayne C. Linn	23223 Wade Ave, Torrance CA <del>90508</del> 90505
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2	Nancy T Linn	Nancy T Linn	23223 Wade Ave, Torrance CA 90505
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3	Hans Ackermann	Hans Ackermann	19908 Mildred Ave Torrance
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4	BONNIE PRICE	Bonnie Price	22008 MAKIPASA AVE TORRANCE 90502
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5	Raedel Hipolito	Raedel Hipolito	14771 Athel Ave Irvine, CA 92606
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* 6	ANN BROWN	ANN BROWN	22510 BIAK Court, Torrance, CA 90505
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First Name	Last Name	Signature	Address
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1	Sharon Oblinger	Sharon Oblinger	2611 160th St Redondo Beach 90278
2	Lara Duke	Lara Duke	611 N Paulina RB 90278
3	EUGENE KRC	Eugene Krc	19319 TOMLEE AV. TORRANCE 90503
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## PETITION TO DEMAND BEACH CITIES HEALTH DISTRICT NOT BUILD THEIR PROPOSED "HEALTHY LIVING CAMPUS"

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First Name	Last Name	Signature	Address
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1	DAVID DUKE		611 N Paulina Ave
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90278





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First Name	Last Name	Signature	Address
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1	Georgia	Capell	19320 Hingsdale - 90503
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# PETITION TO DEMAND BEACH CITIES HEALTH DISTRICT NOT BUILD THEIR PROPOSED "HEALTHY LIVING CAMPUS"

To the Honorable Albert Y. Muratsuchi, Assemblymember, 66th Assembly District, and to All Other Interested Elected Officials and Parties:

**We**, the undersigned registered voters in your district, are vehemently opposed to the proposed Beach Cities Health District (BCHD) plan to demolish the Beach Cities Health Center in order to build a high-density, \$530M, 420+ unit, assisted living facility over the next 15 years, and petition you to act in your constituents' interests as follows:

- State your opposition to this project.
- Introduce legislation to change the BCHD "design build" waiver to the "design bid" protection usually afforded to citizens.
- Introduce legislation clarifying that the "project" is beyond the scope of the intent of a health district.

Sign

First Name Last Name Signature Address

- 1 DORIS PLIEGO Doris I Pliego 435 N. Prospect Ave Redondo Beach 90277
- 2 MICHAEL PLIEGO Michael Pliego 435 N. Prospect Ave, Redondo Beach 90277
- 3 TERRENCE BENSON Terrence Benson 431 N. PROSPECT AVE. REDONDO BEACH 90277
- 4 Jeff Paine Jeff C Paine 434 Paulina Ave Redondo Beach 90277
- 5 RALPH WILLIKAN R. Millikan 437 N. Prospect AVE RB 90277
- 6 Krystin Murray Krystin Murray 430 N. Paulina Ave, RB 90277
- 7 DENNIS M. SHINSATO Dennis M. Shinsato 425 N. PROSPECT AVE RB 90277
- 8 RANDY SHINSATO Randy Shinsato 425 N. PROSPECT AVE. RB 90277
- 9 JACALYNN SPEAR Jacalynn Spear 412 N. Paulina Ave RB 90277
- 10 ART SPEAR Art Spear 412 N. PAULINA AVE RB 90277
- 11 JOSEPHINE MILLIKE Josephine Millikan 437 N. Prospect BL. 90277
- 12 SUSAN OVERTON Susan Overton 447 N. PROSPECT R.B. 90277
- 13 DONALD OVERTON Donald Overton 447 N. PROSPECT AVE. R.B. 90277
- 14 HELEN INGINO Helen B. Ingino 409 N. PROSPECT AVE Red Bdr 90277
- 15 ROBERT FARHAR Robert Farhar 438 N. PAULINA AVE. REDONDO BEACH 90277
- 16 Gene Stewart Gene Stewart 432 N. Paulina Ave RB, CA 90277
- 17 Ben Chu Ben Chu 443 N. Prospect Ave, RB, CA 90277
- 18 VIVIAN CHU Vivian Chu 443 N. Prospect Ave, RB, CA 90277
- 19 LeeAnn Farmer LeeAnn Farmer 436 N. Paulina Ave RB CA 90277
- 20 Irma M.I. Rosales Irma M.I. Rosales 423 N. Prospect Ave, RB CA 90277
- 21 Edward Rosales Edward Rosales 423 N. Prospect Ave RB CA 90277
- 22 Oliver Soria Oliver Soria 421 N. Prospect Ave RB CA 90277
- 23 Jeanne Miller Jeanne Miller 2733 Fisk Lane RB, CA 90278
- 24 Emma Aranda Emma Aranda 20808 Christine Ave Torrance, 90505
- 25 Kathryn Erwell Kathryn Erwell 415 N. Main Ave RB CA 90277

Council Meeting of  
May 25, 2021

Honorable Mayor and Members  
 of the City Council  
 City Hall  
 Torrance, California

**Members of the Council:**

**SUBJECT: Community Development – Accept and File update regarding the Beach Cities Health District Healthy Living Campus Master Plan and Approve Comment Letter. Expenditure: None.**

**RECOMMENDATION**

Recommendation of the Community Development Director that City Council:

1. Accept and file an update regarding the Beach Cities Health District Healthy Living Campus Master Plan; and
2. Approve City's Draft Environmental Impact Report comment letter.

**FUNDING**

No funding is required for this action.

**BACKGROUND**

In 2017, Beach Cities Health District (BCHD) began the planning process for redevelopment of the BCHD Campus located at 514 Prospect Avenue in the City of Redondo Beach, adjacent to the City of Torrance's western border. Early planning and design phases involved development of the Healthy Living Campus Master Plan (Master Plan) and a series of community meetings and outreach efforts to gather public input.

In 2019, BCHD announced a Notice of Preparation (NOP) and that an Environmental Impact Report (EIR) would be prepared in compliance with the California Environmental Quality Act, with BCHD as the Lead Agency and the cities of Redondo Beach and Torrance as Responsible Agencies. The NOP included a public review and comment period and several scoping meetings including an interagency meeting. Staff notes recommendations were made for the environmental analysis and a comment letter prepared by various multiple Torrance City departments was submitted (Attachment B).

Since its introduction, the Master Plan has been through several planning and design iterations with the current 2020 Master Plan proposing redevelopment in two phases (Phase 1 and 2) and construction activities occurring over 29 months and 28 months, respectively. Phase 1 involves a new Residential Care for the Elderly (RCFE) building measuring 203,700 square feet in floor area and reaching 103 feet in height above the campus ground level and 133.5 feet above a vacant lot along Flagler Lane. The RCFE building consists of 157 Assisted Living units and 60 Memory Care units, and features floor area dedicated to related programming and services. The RCFE building also proposes three new driveways along Flagler Lane, which are located in the City of Torrance right-of-way. Following construction of the RCFE building, the existing Beach Cities Health Center (former South Bay Hospital building) would be demolished providing space for open recreation as well as surface parking. Phase 2 is less defined than the project-level preliminary site development plan under Phase 1, and would include a Wellness Pavilion (up to 37,150 sf), an Aquatics Center (up to 31,300 sf), and a Center for Health and Fitness (up to 20,000

sf). Parking would be provided in a new parking structure measuring up to 292,500 sf with up to 2 subterranean levels and 8.5 above ground levels. Information on the BCHD Campus redevelopment is available online at [www.bchdcampus.org/campus](http://www.bchdcampus.org/campus).

In March 2021, BCHD released the Draft EIR (DEIR) for the current 2020 Master Plan with a 90-day public review and comment period extending from March 10 through June 10, during which BCHD is accepting written comments. Information on the DEIR and methods to submit written and oral comments is available online at [www.bchdcampus.org/eir](http://www.bchdcampus.org/eir). Staff notes upon its release announcements were also made by the Torrance City Council regarding the DEIR and public review and comment period.

### **SUMMARY**

The BCHD DEIR identifies the potential environmental impacts associated with the 2020 Master Plan, including the construction-related impacts and long-term operational impacts after construction is completed for the Phase 1 preliminary site development plan and the more general Phase 2 development program. The DEIR also included areas of community concern that were identified during the planning and design phases through community outreach and input as well as agency and public comments letters received in response to the NOP. Redevelopment of the BCHD Campus would result in significant and unavoidable construction-related noise impacts. There would also be less than significant impacts with mitigation to multiple areas including aesthetics and visual resources, air quality, biological resources, cultural resources and tribal cultural resources, geology and soils, hazards and hazardous materials, and transportation. Additionally, there would be less than significant impacts (without mitigation) to multiple areas including energy, greenhouse gas emissions and climate change, hydrology and water quality, land use and planning, population and housing, public services, and utilities and service systems.

Since its release staff has completed interdepartmental review of the DEIR and has prepared a comment letter (Attachment A). The comment letter expresses concern with the potential significant impacts to Torrance residents living east of the BCHD Campus, and strongly urges consideration of additional alternatives and mitigation measures to lessen the potential impacts, and prevent significant and avoidable impacts. In the judgment of staff, repositioning the RCFE building further west with each floor stepping back farther from Flagler Lane as building height increases would achieve functional compatibility and consistency in scale, mass, and character with the residential neighborhood to the east. Doing so may also provide the best opportunity for mitigating significant and avoidable construction noise impacts. Staff also notes that access to Flagler Lane is prohibited per Torrance Municipal Code Section 92.30.8 and that the proposed driveways be eliminated from the design.

In addition, staff notes the environmental analysis prepared for Phase 2 is vague and found to be inconsistent throughout the DEIR, and that any future consideration for development of Phase 2 should begin with a comprehensive environmental analysis in the form of a Subsequent EIR, as it is evident Phase 2 may have significant effects not discussed in the DEIR. Staff strongly recommends that in preparation of the Subsequent EIR all stakeholders be reached and engaged, particularly those that live near the BCHD Campus. Considering the aforementioned concerns with future Phases, staff notes an Addendum is considered inappropriate and would not provide for public noticing nor a fair opportunity to receive input from Torrance residents living near the BCHD Campus.

The DEIR comment letter identifies multiple areas of the Draft EIR that require correction, further analysis and suggests modifications, where appropriate that would assist with addressing the project's significant impacts. Staff has also prepared a cover letter that may be signed by the Mayor on behalf of the City Council to convey the concerns your honorable body may have with the associated project. Lastly, staff notes public comments received with respect to the DEIR are attached to the letter to also convey community input and concerns.

**RECOMMENDATION**

Recommendation of the Community Development Director that City Council accept and file an update regarding the Beach Cities Health District Healthy Living Campus Master Plan and approve the City's comment letter.

Respectfully submitted,

Danny E. Santana  
Community Development Director

CONCUR:

  
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Danny E. Santana  
Community Development Director

By   
\_\_\_\_\_  
Oscar Martinez  
Planning and Environmental Manager

  
\_\_\_\_\_  
Aram Chaparyan  
City Manager

Attachment:

- A. Torrance BCHD Draft EIR Comment Letter (May 2021)
- B. Torrance BCHD Scoping Notice Comment Letter (July 2019)



**DRAFT**

&gt;&gt;MAYOR / COUNCIL LETTERHEAD&lt;&lt;

&gt;&gt;DATE&lt;&lt;

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

**RE: Healthy Living Campus Draft Environmental Impact Report**

Dear Mr. Meisinger,

On behalf of the City of Torrance, I am writing in regard to the Draft Environmental Impact Report (Draft EIR) prepared for the Beach Cities Health District (BCHD) Healthy Living Campus Master Plan (Project).

The City of Torrance appreciates being notified of the Draft EIR, and as a Responsible Agency, has prepared comments that are focused on the shortcomings of the Draft EIR, and include recommendations for additional alternatives and mitigation measures (Attachment 1).

After careful review of the Draft EIR, the City of Torrance is very concerned with the Project significant impacts to Torrance residents living east of the Project site. The City of Torrance strongly urges consideration of additional alternatives and mitigation measures to lessen the potential impacts, and altogether prevent significant and avoidable impacts. Repositioning the Residential Care for the Elderly (RCFE) building further west with each floor stepping back farther from Flagler Lane as building height increases would achieve functional compatibility and consistency in scale, mass, and character with the residential neighborhood to the east. Doing so may also provide the best opportunity for mitigating significant and avoidable construction noise impacts. Consideration that is more thoughtful should also be made regarding access to Flagler Lane, which is prohibited per Torrance Municipal Code Section 92.30.8.

In addition, the environmental analysis prepared for Phase 2 is vague and found to be inconsistent throughout the Draft EIR. Any future consideration for development of Phase 2 should begin with a comprehensive environmental analysis in the form of a Subsequent EIR, as it is evident Phase 2 may have significant effects not discussed in the Draft EIR. The City of Torrance has many mechanisms at its disposal to reach Torrance residents and businesses, and it is strongly recommended that in preparation of the Subsequent EIR all stakeholders be reached and engaged, particularly those that live near the Project site.

**DRAFT**

Lastly, considering the aforementioned concerns with future Phases, an Addendum is considered inappropriate and would not provide for public noticing nor a fair opportunity to receive input from Torrance residents living near the Project site.

Thank you for your attention to these comments. Also attached are comment letters received that are pertinent to the Draft EIR (Attachment 2). If there are any questions for the City of Torrance, please do not hesitate to contact Oscar Martinez, Planning and Environmental Manager of the Community Development Department, by email at [OMartinez@TorranceCA.gov](mailto:OMartinez@TorranceCA.gov) or by telephone at (310) 618-5990.

Sincerely,

Patrick J. Furey, Mayor  
City of Torrance

cc: Tom Bakaly, BCHD CEO (sent via email to: [tom.bakaly@bchd.org](mailto:tom.bakaly@bchd.org))

Attachments:

1. City of Torrance Comments on the Draft EIR
2. Comment Letters

## City of Torrance

### Comments on the Draft Environmental Impact Report (Draft EIR) prepared for the Beach Cities Health District (BCHD) Healthy Living Campus Master Plan (Project)

#### Executive Summary

##### *Alternatives Analysis*

Table ES-2 Identification of Environmentally Superior Alternative (also shown as Table 5.5.-5 Impact Comparison of Alternatives to the Proposed Project) does not include the impact comparison of Alternative 6 to the proposed Project. The Draft EIR should be reviewed to include Alternative 6 in the impact comparison of alternatives to the proposed Project.

#### Project Description

##### *Section 2.2.2 Surrounding Land Uses*

The description of zoning and land use designations surrounding the Project site is incorrect. The single-family residences east of the Project site are within the R-H/R-1 Zone (Hillside and Local Coastal Overlay Zone (Hillside Overlay) / Single Family Residential District) and have a General Plan land use designation of R-LO (Low Density Residential). Towers Elementary School is located approximately 330 feet east of the Project site and is within the P-U Zone (Public Use District). The City of Torrance would consider these uses altogether to be sensitive receptors and should be considered as such within the context of the environmental analysis.

##### *Section 2.5.1.2 Project Architecture and Design*

The Draft EIR incorrectly references Torrance Municipal Code Section 13.9.7, powers and duties of the Traffic Commission, as the sole decision-making body of City of Torrance for the proposed RCFE Building. As identified in Section 2.2.5 of the Draft EIR, the eastern portion of the Project site is located within the City of Torrance, and therefore development associated with the RCFE Building, such as the retaining walls located in the right-of-way, is subject to Torrance Municipal Code Section 92.13.12(d), which states that no fence, wall or hedge shall exceed eight feet and five feet in height, respectively. Any fence or retaining wall greater than eight feet and five feet in height, respectively, is subject to discretionary review by the Torrance Planning Commission (and Torrance City Council on appeal).

##### *Section 2.5.1.3 Proposed Access, Circulation, and Parking*

Coordination with the Torrance Fire Department and the Torrance Police Department is required to prepare an Emergency Response Plan should emergency access to the campus on Flagler Lane continue to be proposed, which is located in the City of Torrance. Flagler Lane south of Beryl Street is a local street, and adding commercial driveways on this road segment will be a violation of the City's Municipal Code and will conflict with the City's General Plan.

##### *Section 2.5.1.6 / Section 2.5.2.4 Construction Activities*

Figure 2-10 Construction Haul Routes and the proposed construction haul route for Phase II are not 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 Draft EIR should be reviewed for consistency with the Torrance General Plan Circulation & Infrastructure Element Figure CI-3 Truck Routes and Rail Lines. In addition, as described in the Draft EIR the street names are incorrect.

#### Aesthetics and Visual Resources

##### *Section 3.1.1 Flagler Lane*

Description of the environmental setting along Flagler Lane is incomplete. Flagler Lane continues south of 190th Street to Beryl Street and Flagler Alley and supports the single-family residential neighborhood to the east and southeast. Flagler Lane also supports school drop-offs and pick-ups at Towers Elementary School during two periods of considerable daily use.



### *Section 3.1.1 Existing Public Views of the Project Site*

Views of the Project site were selected without consultation from the City of Torrance. The Draft EIR must consider the potential impacts to public views that would have a direct view of the Project as result of the larger and taller buildings being proposed, specifically from locations at: (1) cul-de-sac at Tomlee Avenue facing west and southwest, (2) intersection at Towers Street and Mildred Avenue facing west, and (3) intersection at Tomlee Avenue and Mildred Avenue facing west and northwest.

### *Section 3.1.2 Torrance General Plan Land Use Element*

Per Land Use Element Policy 2.3, the Draft EIR should consider the potential Project impacts on surrounding property, specifically the residential neighborhood to the east, and the potential impact of existing uses to the Project. Per Land Use Element Policy 2.5, the Draft EIR should also consider the potential impacts to landscape and hardscape buffers, specifically the slope between the Project site and the residential neighborhood to the east, to minimize adverse effects where appropriate. In addition, please note the Torrance General Plan was adopted in 2010, not 2005 as stated incorrectly in the Draft EIR.

### *Section 3.1.2 Torrance General Plan Community Resources Element*

The Community Resources Element policies and objectives are incorrectly cited in the Draft EIR and not consistent with the Torrance General Plan, specifically Community Resources Element Policy 1.2 as opposed to 2.1 listed incorrectly in the Draft EIR, and Objectives 4 and 19. Per Community Resources Element Policy 4.3, the Draft EIR should consider the potential impacts to planting of new trees and the preservation of existing street trees along Flagler Lane and Flagler Alley.

### *Section 3.1.2 Torrance Municipal Code*

The Draft EIR must include Torrance Municipal Code 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. Torrance Municipal Code Section 92.30.3 must also be included to address the potential impacts on surrounding property, specifically the residential neighborhood to the east across Flagler Lane.

### *Section 3.1.4 Impact/Mitigation Measure VS-1*

Per Mitigation Measure VIS-1, only view of the ridgeline of the Palos Verdes hills would be achieved with a revised design. The Draft EIR should consider further reduction of the RCFE building height to preserve greater panoramic view of the Palos Verdes hills as currently viewed from the intersection of 190th Street and Flagler Lane. The analysis should consider and demonstrate with visual aids/exhibits alternative 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. The visual aids/exhibits should also demonstrate the potential impacts to the existing view corridor resulting from Phase II development.

### *Section 3.1.4 Impact VS-2*

Impact VS-2 is not consistent with the Torrance General Plan. The Draft EIR identifies the RCFE building will change the visual character of the Project site and surrounding areas, and identifies the RCFE building would be more visually prominent, substantially taller than the existing buildings onsite, and larger than buildings in the vicinity. Phase II development would include construction of additional buildings that are taller and have more massing than existing buildings in the Project vicinity. These structures would also be substantially closer to Torrance residences. The Draft 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 not the RCFE building and Phase II development. The Draft EIR should consider the entirety of the Project (Phase I and II) for potential conflicts with the Torrance General Plan, including Land Use Element Policies 2.3, 2.5, 3.1, and 11.1. These policies require the analysis to consider and demonstrate with visual aids/exhibits the potential Project impacts on surrounding property, specifically to the residential neighborhood to the east, and the potential impacts of these existing uses to the Project. The analysis should consider and demonstrate with visual aids/exhibits the potential impacts

to landscape and hardscape buffers, specifically the slope between the Project site and the residential neighborhood to the east, to minimize adverse effects where appropriate. The Draft EIR should also consider methods to mitigate potential conflicts with the Torrance General Plan to achieve consistency in scale, mass, and character with structures in the surrounding area, and visual and functional compatibility with the existing residential neighborhood to the east. The analysis should consider and demonstrate with visual aids/exhibits repositioning the RCFE building further west with each floor stepping back farther from Flagler Lane as building height increases.

#### *Section 3.1.4 Impact VS-3*

The Draft EIR states that exterior lighting will be directed or shielded so as not to disturb neighboring residential properties. This should include surface level parking lot lighting, as well as building or landscape lighting. Any lighted signage should not be too bright to cause a nuisance to neighboring residences. Impact VS-3 should include additional analysis to consider the potential Project impacts on surrounding property, specifically to the residential neighborhood to the east. The Draft EIR should demonstrate with visual aids/exhibits the increased lighting associated with the Project during nighttime construction and operation. The analysis should consider methods to mitigate potential impacts including a well-developed lighting plan and requirements for post-construction field measurements, and should consider repositioning the RCFE building further west with each floor stepping back farther from Flagler Lane as building height increases.

#### *Section 3.1.1 Sensitive Uses in the Project Vicinity / Section 3.1.4 Impact VS-4*

Identification of the potential impacts to existing solar collectors atop single-family residences is incomplete. Impact VS-4 should include additional analysis to consider the potential Project impacts on surrounding property, specifically to existing solar collectors atop single-family residences located in the residential neighborhood to the east. The Draft EIR should consider the potential impacts to existing solar collectors atop single-family residences near to the Project site, which are located at 5662 and 5629 Towers Street, within 180 feet and 510 feet, respectively, east of the Project site within the shade contour. The analysis should also consider the potential impacts to future solar collectors near to the Project site within the shade contour and the potential impacts to energy. The analysis should consider methods to mitigate potential impacts including requirements for post-construction field measurements, and repositioning the RCFE building further west with each floor stepping back farther from Flagler Lane as building height increases.

### **Biological Resources**

#### *Phase 1 Proposed Project Landscape Site Plan*

Urban coyotes are present in the region and in the area of the proposed project. Urban coyotes pose a threat to domestic pets and human pet handlers. Mitigation of urban coyotes includes reducing attractive habitat, including foliage areas used for denning, birthing, and rearing. The proposed Project is situated within a known travel corridor for urban coyotes between Dominguez Park and Wilderness Park. The proposed Project includes a landscape plan (pg. 115) that calls for a landscape buffer using a shrub and groundcover plant mix (feature no. 13). The proposed Project's structure bordering Flagler Lane would provide ample shade and privacy that when combined with a groundcover plant mix on the slope, would likely attract urban coyotes for use as a denning location. This could result in an unanticipated influx of urban coyotes into the Torrance residential neighborhood and pose a threat to domestic pets and pet handlers. It is recommended that the landscape buffer along Flagler Lane not utilize a shrub and groundcover plant mix. As an alternative, it is recommended that the proposed project consider California native plant species and drought tolerant planting, planted in a wide pattern within a synthetic or natural wood chip base or similarly exposed planting plan that is not attractive habitat for urban coyotes.

### **Geology and Soils**

#### *Section 3.6.1 Landslide and Slope Instability / Section 3.6.4 Impact/Mitigation Measure GEO-1*

The Draft EIR neglects to identify and analyze the slope bounding the Project site to the east and the series of retaining walls within the City of Torrance right-of-way along Flagler Lane and Flagler Alley. The Draft

EIR should include a slope stability analysis (i.e. global static stability, global seismic stability, and surficial stability) to consider the potential Project impacts on the slope and series retaining walls and to surrounding property. The analysis should consider methods to mitigate potential Project impacts that could cause a landslide including greater building setbacks from top of slope and new or reinforced retaining walls along the slope or regrade slope to a 2:1 (H:V) max. If slope reinforcement is found to be necessary, the analysis should include a construction cost estimate and identify which Agency (i.e. BCHD, Redondo Beach, or Torrance) will carry responsibility. The analysis should also consider and demonstrate with visual aids/exhibits repositioning the RCFE building further west with each floor stepping back farther from Flagler Lane as building height increases to minimize the potential adverse effects.

### **Hazards and Hazardous Materials**

#### *Section 3.8.4 Impact HAZ-5*

As previously commented, coordination with the Torrance Fire Department and the Torrance Police Department is required to prepare an Emergency Response Plan should emergency access to the campus on Flagler Lane continue to be proposed, which is located in the City of Torrance.

### **Land Use and Planning**

#### *Section 3.10.4 Impact LU-1*

Impact LU-1 is not consistent with the Torrance General Plan and conflicts with the Torrance Municipal Code. As previously mentioned, the Draft EIR identifies the RCFE building will change the visual character of the Project site and surrounding areas, and identifies the RCFE building would be more visually prominent, substantially taller than the existing buildings onsite, and larger than buildings in the vicinity. Phase II development would include construction of additional buildings that are taller and have more massing than existing buildings in the Project vicinity. The Draft 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 not the RCFE building and Phase II development. The Draft EIR should consider the entirety of the Project (Phase I and II) for potential conflicts with the Torrance General Plan, including Land Use Element Policies 2.3, 2.5, 3.1, and 11.1. These policies require the analysis to consider and demonstrate with visual aids/exhibits the potential Project impacts on surrounding property, specifically to the residential neighborhood to the east, and the potential impacts of these existing uses to the Project. The Draft EIR should consider additional methods to mitigate the potential Project impacts such as repositioning the RCFE building further west with each floor stepping back farther from Flagler Lane as building height increases.

The Draft EIR must include Torrance Municipal Code 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. Torrance Municipal Code Section 92.30.3 must also be included to address the potential impacts on surrounding property, specifically the residential neighborhood to the east across Flagler Lane, from the proposed exterior loading, unloading and storage areas, and trash storage areas along Flagler Lane.

As identified in Section 2.2.5 of the Draft EIR, the eastern portion of the Project site is located within the City of Torrance, and therefore development associated with the RCFE Building, such as the retaining walls located in the right-of-way, is subject to Torrance Municipal Code Section 92.13.12(d), which states that no fence, wall or hedge shall exceed eight feet and five feet in height, respectively. Any fence or retaining wall greater than eight feet and five feet in height, respectively, is subject discretionary review by the Torrance Planning Commission (and Torrance City Council on appeal).

The Draft EIR understates the conflict with access to Flagler Lane, which is prohibited per Torrance Municipal Code Section 92.30.8. The analysis should consider more carefully other Project alternatives that do not access Flagler Lane.



## Noise

### *Construction Noise Levels / Section 3.11.5 Impact/Mitigation Measure NOI-1*

Per Torrance Municipal Code Section 46.3.1 construction is prohibited on Sundays and Holidays observed by City Hall. The Draft EIR should specify in MM NOI-1 that construction is prohibited on Sundays and Holidays observed by Torrance City Hall, and that the arrival times of workers, construction vehicles and materials should adhere to the allowable hours as specified. The Draft EIR should identify which Agency (i.e. BCHD, Redondo Beach, and Torrance) will enforce construction noise violations and respond to noise complaints. The Draft EIR should also consider 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. Doing so may provide the best opportunity for mitigating significant and avoidable construction noise impacts. In addition, as previously commented Figure 2-10 Construction Haul Routes and the proposed construction haul route for Phase II are not 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 noise analysis should be reviewed for consistency with the Torrance General Plan Circulation & Infrastructure Element Figure CI-3 Truck Routes and Rail Lines.

### *Operational Noise Levels / Section 3.11.5 Impact/Mitigation Measure NOI-3*

Per Torrance Municipal Code Section 46.7.2(c) residential and commercial noise limits are adjusted during certain noise conditions. The Draft EIR should consider these noise limit adjustments to identify potential operational noise impacts such as from mechanical equipment, outdoor events, and the proposed parking structure. The analysis should consider additional methods for mitigation such as requirements for a well-developed noise attenuation plan and post-construction field measurements, and should consider restricting amplified noise at outdoor events to be allowed 7:00am to 7:00pm Sunday through Thursday and 7:00am to 10:00pm on Friday and Saturday, and limiting the number of outdoor events altogether. The Draft EIR should also consider other methods to reducing operational noise impacts such as repositioning the RCFE building further west with each floor stepping back farther from Flagler Lane as building height increases. The Draft EIR should also consider additional methods to mitigate operation noise emitted from the proposed parking structure, such as: driving surfaces should be covered with material that reduces noise from tires (screeching); and the parking structure exterior should be lined with screening materials (e.g. screen wall with planters) to reduce noise emitted from car alarms, doors closing, and radios. An acoustical consultant should be required to recommend mitigation measures to lessen the effects of noise from the structure.

## Transportation

### *Access to Flagler Lane / Torrance Municipal Code Section 92.30.8*

Eliminate the proposed driveways on Flagler Lane from the design (i.e. implement Alternative 3). Reflect this change throughout the entire EIR and all appendices. Per Torrance Municipal Code Section 92.30.8, “no vehicular access shall be permitted to a local street from a commercially or industrially zoned through lot which also has frontage on a major or secondary street. In no case shall a commercial or industrial lot be developed in such a manner that traffic from the commercial or industrial uses on it will be channeled onto any residential streets.” The Draft EIR (p. RG-18) implies this provision does not apply to the Project because it is not a land use within the City of Torrance. The City maintains its authority to apply the Torrance Municipal Code to a road within its right-of-way. Flagler Lane south of Beryl Street is a local street, and adding commercial driveways on this road segment will be a violation of the City’s Municipal Code and will conflict with the City’s General Plan.

Also, clearly state that the City’s trial implementation of a one-way traffic restriction on Flagler Lane is not related to the proposed development and should not be construed as a mitigation for any cut-through traffic that the proposed development will introduce.

### *BCHD Bike Path Project*

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 (MSIP) 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.

### *Construction Haul Routes (Draft EIR p. 2-42)*

As previously commented, Figure 2-10 Construction Haul Routes and the proposed construction haul route for Phase II is not 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 transportation analysis must be reviewed for consistency with the Torrance General Plan Circulation & Infrastructure Element Figure CI-3 Truck Routes and Rail Lines. The construction haul routes must avoid Torrance streets to the maximum extent possible and Torrance local collector streets entirely.

### *Vehicular Site Access (Appendix p. J-7)*

Remove the driveway on Flagler Lane. Revise the project trip distribution to eliminate all project trips assigned to Flagler Lane.

### *City of Torrance Standards for Intersection Operational Evaluation (Appendix p. J-16)*

Make the thresholds consistent with those provided by the City of Torrance in its July 29, 2019 comment letter (Appendix p. A-164).

### *Existing Roadway Facilities (Appendix p. J-18)*

Provide additional information that Flagler Lane south of Beryl Street is a local street.

## **Public Services**

As previously commented, coordination with the Torrance Fire Department and the Torrance Police Department is required to prepare an Emergency Response Plan should emergency access to the campus on Flagler Lane continue to be proposed, which is located in the City of Torrance. Flagler Lane south of Beryl Street is a local street, and adding commercial driveways on this road segment will be a violation of the City's Municipal Code and will conflict with the City's General Plan.

## **Alternatives**

### *Section 5.5.3 Alternative 3 – Revised Access and Circulation*

As previously commented, clearly state that the City's trial implementation of a one-way traffic restriction on Flagler Lane is not related to the proposed development and should not be construed as a mitigation for any cut-through traffic that the proposed development will introduce.

Also, the Draft EIR should consider repositioning the RCFE building further west with each floor stepping back farther from Flagler Lane as building height increases. Doing so may provide the best opportunity for mitigating the potential impacts, and altogether prevent significant and avoidable impacts.

### *Section 5.5.6 Alternative 6 - Reduced Height Alternative*

The Draft EIR should include visual aids/exhibits a three-dimensional model of Alternative 6 to demonstrate the reduced height alternative. As previously commented, the Draft EIR should consider repositioning the RCFE building further west with each floor stepping back farther from Flagler Lane as building height increases. In addition, eliminating the proposed driveways on Flagler Lane from the design. Doing so may provide the best opportunity for mitigating the potential impacts, and when combined, may prevent significant and avoidable impacts.

### *Section 5.6 Identification of Environmentally Superior Alternative*

Table 5.5.-5 Impact Comparison of Alternatives to the Proposed Project (also shown as Table ES-2 Identification of Environmentally Superior Alternative) does not include the impact comparison of Alternative 6 to the proposed Project. The Draft EIR should be reviewed to include Alternative 6 in the impact comparison of alternatives to the proposed Project.

Council Meeting of  
May 25, 2021

Honorable Mayor and Members  
 of the City Council  
 City Hall  
 Torrance, California

**Members of the Council:**

**SUBJECT: Community Development – Accept and File update regarding the Beach Cities Health District Healthy Living Campus Master Plan and Approve Comment Letter. Expenditure: None.**

**RECOMMENDATION**

Recommendation of the Community Development Director that City Council:

1. Accept and file an update regarding the Beach Cities Health District Healthy Living Campus Master Plan; and
2. Approve City's Draft Environmental Impact Report comment letter.

**FUNDING**

No funding is required for this action.

**BACKGROUND**

In 2017, Beach Cities Health District (BCHD) began the planning process for redevelopment of the BCHD Campus located at 514 Prospect Avenue in the City of Redondo Beach, adjacent to the City of Torrance's western border. Early planning and design phases involved development of the Healthy Living Campus Master Plan (Master Plan) and a series of community meetings and outreach efforts to gather public input.

In 2019, BCHD announced a Notice of Preparation (NOP) and that an Environmental Impact Report (EIR) would be prepared in compliance with the California Environmental Quality Act, with BCHD as the Lead Agency and the cities of Redondo Beach and Torrance as Responsible Agencies. The NOP included a public review and comment period and several scoping meetings including an interagency meeting. Staff notes recommendations were made for the environmental analysis and a comment letter prepared by various multiple Torrance City departments was submitted (Attachment B).

Since its introduction, the Master Plan has been through several planning and design iterations with the current 2020 Master Plan proposing redevelopment in two phases (Phase 1 and 2) and construction activities occurring over 29 months and 28 months, respectively. Phase 1 involves a new Residential Care for the Elderly (RCFE) building measuring 203,700 square feet in floor area and reaching 103 feet in height above the campus ground level and 133.5 feet above a vacant lot along Flagler Lane. The RCFE building consists of 157 Assisted Living units and 60 Memory Care units, and features floor area dedicated to related programming and services. The RCFE building also proposes three new driveways along Flagler Lane, which are located in the City of Torrance right-of-way. Following construction of the RCFE building, the existing Beach Cities Health Center (former South Bay Hospital building) would be demolished providing space for open recreation as well as surface parking. Phase 2 is less defined than the project-level preliminary site development plan under Phase 1, and would include a Wellness Pavilion (up to 37,150 sf), an Aquatics Center (up to 31,300 sf), and a Center for Health and Fitness (up to 20,000



sf). Parking would be provided in a new parking structure measuring up to 292,500 sf with up to 2 subterranean levels and 8.5 above ground levels. Information on the BCHD Campus redevelopment is available online at [www.bchdcampus.org/campus](http://www.bchdcampus.org/campus).

In March 2021, BCHD released the Draft EIR (DEIR) for the current 2020 Master Plan with a 90-day public review and comment period extending from March 10 through June 10, during which BCHD is accepting written comments. Information on the DEIR and methods to submit written and oral comments is available online at [www.bchdcampus.org/eir](http://www.bchdcampus.org/eir). Staff notes upon its release announcements were also made by the Torrance City Council regarding the DEIR and public review and comment period.

### **SUMMARY**

The BCHD DEIR identifies the potential environmental impacts associated with the 2020 Master Plan, including the construction-related impacts and long-term operational impacts after construction is completed for the Phase 1 preliminary site development plan and the more general Phase 2 development program. The DEIR also included areas of community concern that were identified during the planning and design phases through community outreach and input as well as agency and public comments letters received in response to the NOP. Redevelopment of the BCHD Campus would result in significant and unavoidable construction-related noise impacts. There would also be less than significant impacts with mitigation to multiple areas including aesthetics and visual resources, air quality, biological resources, cultural resources and tribal cultural resources, geology and soils, hazards and hazardous materials, and transportation. Additionally, there would be less than significant impacts (without mitigation) to multiple areas including energy, greenhouse gas emissions and climate change, hydrology and water quality, land use and planning, population and housing, public services, and utilities and service systems.

Since its release staff has completed interdepartmental review of the DEIR and has prepared a comment letter (Attachment A). The comment letter expresses concern with the potential significant impacts to Torrance residents living east of the BCHD Campus, and strongly urges consideration of additional alternatives and mitigation measures to lessen the potential impacts, and prevent significant and avoidable impacts. In the judgment of staff, repositioning the RCFE building further west with each floor stepping back farther from Flagler Lane as building height increases would achieve functional compatibility and consistency in scale, mass, and character with the residential neighborhood to the east. Doing so may also provide the best opportunity for mitigating significant and avoidable construction noise impacts. Staff also notes that access to Flagler Lane is prohibited per Torrance Municipal Code Section 92.30.8 and that the proposed driveways be eliminated from the design.

In addition, staff notes the environmental analysis prepared for Phase 2 is vague and found to be inconsistent throughout the DEIR, and that any future consideration for development of Phase 2 should begin with a comprehensive environmental analysis in the form of a Subsequent EIR, as it is evident Phase 2 may have significant effects not discussed in the DEIR. Staff strongly recommends that in preparation of the Subsequent EIR all stakeholders be reached and engaged, particularly those that live near the BCHD Campus. Considering the aforementioned concerns with future Phases, staff notes an Addendum is considered inappropriate and would not provide for public noticing nor a fair opportunity to receive input from Torrance residents living near the BCHD Campus.



The DEIR comment letter identifies multiple areas of the Draft EIR that require correction, further analysis and suggests modifications, where appropriate that would assist with addressing the project's significant impacts. Staff has also prepared a cover letter that may be signed by the Mayor on behalf of the City Council to convey the concerns your honorable body may have with the associated project. Lastly, staff notes public comments received with respect to the DEIR are attached to the letter to also convey community input and concerns.

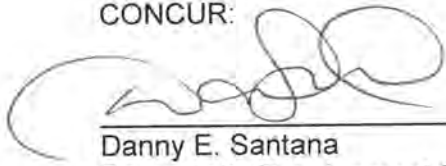
**RECOMMENDATION**


Recommendation of the Community Development Director that City Council accept and file an update regarding the Beach Cities Health District Healthy Living Campus Master Plan and approve the City's comment letter.

Respectfully submitted,

Danny E. Santana  
Community Development Director

CONCUR:

  
\_\_\_\_\_  
Danny E. Santana  
Community Development Director

By   
\_\_\_\_\_  
Oscar Martinez  
Planning and Environmental Manager

  
\_\_\_\_\_  
Aram Chaparyan  
City Manager

Attachment:

- A. Torrance BCHD Draft EIR Comment Letter (May 2021)
- B. Torrance BCHD Scoping Notice Comment Letter (July 2019)

**DRAFT**

&gt;&gt;MAYOR / COUNCIL LETTERHEAD&lt;&lt;

&gt;&gt;DATE&lt;&lt;

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

**RE: Healthy Living Campus Draft Environmental Impact Report**

Dear Mr. Meisinger,

On behalf of the City of Torrance, I am writing in regard to the Draft Environmental Impact Report (Draft EIR) prepared for the Beach Cities Health District (BCHD) Healthy Living Campus Master Plan (Project).

The City of Torrance appreciates being notified of the Draft EIR, and as a Responsible Agency, has prepared comments that are focused on the shortcomings of the Draft EIR, and include recommendations for additional alternatives and mitigation measures (Attachment 1).

After careful review of the Draft EIR, the City of Torrance is very concerned with the Project significant impacts to Torrance residents living east of the Project site. The City of Torrance strongly urges consideration of additional alternatives and mitigation measures to lessen the potential impacts, and altogether prevent significant and avoidable impacts. Repositioning the Residential Care for the Elderly (RCFE) building further west with each floor stepping back farther from Flagler Lane as building height increases would achieve functional compatibility and consistency in scale, mass, and character with the residential neighborhood to the east. Doing so may also provide the best opportunity for mitigating significant and avoidable construction noise impacts. Consideration that is more thoughtful should also be made regarding access to Flagler Lane, which is prohibited per Torrance Municipal Code Section 92.30.8.

In addition, the environmental analysis prepared for Phase 2 is vague and found to be inconsistent throughout the Draft EIR. Any future consideration for development of Phase 2 should begin with a comprehensive environmental analysis in the form of a Subsequent EIR, as it is evident Phase 2 may have significant effects not discussed in the Draft EIR. The City of Torrance has many mechanisms at its disposal to reach Torrance residents and businesses, and it is strongly recommended that in preparation of the Subsequent EIR all stakeholders be reached and engaged, particularly those that live near the Project site.

**DRAFT**

Lastly, considering the aforementioned concerns with future Phases, an Addendum is considered inappropriate and would not provide for public noticing nor a fair opportunity to receive input from Torrance residents living near the Project site.

Thank you for your attention to these comments. Also attached are comment letters received that are pertinent to the Draft EIR (Attachment 2). If there are any questions for the City of Torrance, please do not hesitate to contact Oscar Martinez, Planning and Environmental Manager of the Community Development Department, by email at [OMartinez@TorranceCA.gov](mailto:OMartinez@TorranceCA.gov) or by telephone at (310) 618-5990.

Sincerely,

Patrick J. Furey, Mayor  
City of Torrance

cc: Tom Bakaly, BCHD CEO (sent via email to: [tom.bakaly@bchd.org](mailto:tom.bakaly@bchd.org))

Attachments:

1. City of Torrance Comments on the Draft EIR
2. Comment Letters

## City of Torrance

### Comments on the Draft Environmental Impact Report (Draft EIR) prepared for the Beach Cities Health District (BCHD) Healthy Living Campus Master Plan (Project)

#### Executive Summary

##### *Alternatives Analysis*

Table ES-2 Identification of Environmentally Superior Alternative (also shown as Table 5.5.-5 Impact Comparison of Alternatives to the Proposed Project) does not include the impact comparison of Alternative 6 to the proposed Project. The Draft EIR should be reviewed to include Alternative 6 in the impact comparison of alternatives to the proposed Project.

#### Project Description

##### *Section 2.2.2 Surrounding Land Uses*

The description of zoning and land use designations surrounding the Project site is incorrect. The single-family residences east of the Project site are within the R-H/R-1 Zone (Hillside and Local Coastal Overlay Zone (Hillside Overlay) / Single Family Residential District) and have a General Plan land use designation of R-LO (Low Density Residential). Towers Elementary School is located approximately 330 feet east of the Project site and is within the P-U Zone (Public Use District). The City of Torrance would consider these uses altogether to be sensitive receptors and should be considered as such within the context of the environmental analysis.

##### *Section 2.5.1.2 Project Architecture and Design*

The Draft EIR incorrectly references Torrance Municipal Code Section 13.9.7, powers and duties of the Traffic Commission, as the sole decision-making body of City of Torrance for the proposed RCFE Building. As identified in Section 2.2.5 of the Draft EIR, the eastern portion of the Project site is located within the City of Torrance, and therefore development associated with the RCFE Building, such as the retaining walls located in the right-of-way, is subject to Torrance Municipal Code Section 92.13.12(d), which states that no fence, wall or hedge shall exceed eight feet and five feet in height, respectively. Any fence or retaining wall greater than eight feet and five feet in height, respectively, is subject to discretionary review by the Torrance Planning Commission (and Torrance City Council on appeal).

##### *Section 2.5.1.3 Proposed Access, Circulation, and Parking*

Coordination with the Torrance Fire Department and the Torrance Police Department is required to prepare an Emergency Response Plan should emergency access to the campus on Flagler Lane continue to be proposed, which is located in the City of Torrance. Flagler Lane south of Beryl Street is a local street, and adding commercial driveways on this road segment will be a violation of the City's Municipal Code and will conflict with the City's General Plan.

##### *Section 2.5.1.6 / Section 2.5.2.4 Construction Activities*

Figure 2-10 Construction Haul Routes and the proposed construction haul route for Phase II are not 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 Draft EIR should be reviewed for consistency with the Torrance General Plan Circulation & Infrastructure Element Figure CI-3 Truck Routes and Rail Lines. In addition, as described in the Draft EIR the street names are incorrect.

#### Aesthetics and Visual Resources

##### *Section 3.1.1 Flagler Lane*

Description of the environmental setting along Flagler Lane is incomplete. Flagler Lane continues south of 190th Street to Beryl Street and Flagler Alley and supports the single-family residential neighborhood to the east and southeast. Flagler Lane also supports school drop-offs and pick-ups at Towers Elementary School during two periods of considerable daily use.

### *Section 3.1.1 Existing Public Views of the Project Site*

Views of the Project site were selected without consultation from the City of Torrance. The Draft EIR must consider the potential impacts to public views that would have a direct view of the Project as result of the larger and taller buildings being proposed, specifically from locations at: (1) cul-de-sac at Tomlee Avenue facing west and southwest, (2) intersection at Towers Street and Mildred Avenue facing west, and (3) intersection at Tomlee Avenue and Mildred Avenue facing west and northwest.

### *Section 3.1.2 Torrance General Plan Land Use Element*

Per Land Use Element Policy 2.3, the Draft EIR should consider the potential Project impacts on surrounding property, specifically the residential neighborhood to the east, and the potential impact of existing uses to the Project. Per Land Use Element Policy 2.5, the Draft EIR should also consider the potential impacts to landscape and hardscape buffers, specifically the slope between the Project site and the residential neighborhood to the east, to minimize adverse effects where appropriate. In addition, please note the Torrance General Plan was adopted in 2010, not 2005 as stated incorrectly in the Draft EIR.

### *Section 3.1.2 Torrance General Plan Community Resources Element*

The Community Resources Element policies and objectives are incorrectly cited in the Draft EIR and not consistent with the Torrance General Plan, specifically Community Resources Element Policy 1.2 as opposed to 2.1 listed incorrectly in the Draft EIR, and Objectives 4 and 19. Per Community Resources Element Policy 4.3, the Draft EIR should consider the potential impacts to planting of new trees and the preservation of existing street trees along Flagler Lane and Flagler Alley.

### *Section 3.1.2 Torrance Municipal Code*

The Draft EIR must include Torrance Municipal Code 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. Torrance Municipal Code Section 92.30.3 must also be included to address the potential impacts on surrounding property, specifically the residential neighborhood to the east across Flagler Lane.

### *Section 3.1.4 Impact/Mitigation Measure VS-1*

Per Mitigation Measure VIS-1, only view of the ridgeline of the Palos Verdes hills would be achieved with a revised design. The Draft EIR should consider further reduction of the RCFE building height to preserve greater panoramic view of the Palos Verdes hills as currently viewed from the intersection of 190th Street and Flagler Lane. The analysis should consider and demonstrate with visual aids/exhibits alternative 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. The visual aids/exhibits should also demonstrate the potential impacts to the existing view corridor resulting from Phase II development.

### *Section 3.1.4 Impact VS-2*

Impact VS-2 is not consistent with the Torrance General Plan. The Draft EIR identifies the RCFE building will change the visual character of the Project site and surrounding areas, and identifies the RCFE building would be more visually prominent, substantially taller than the existing buildings onsite, and larger than buildings in the vicinity. Phase II development would include construction of additional buildings that are taller and have more massing than existing buildings in the Project vicinity. These structures would also be substantially closer to Torrance residences. The Draft 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 not the RCFE building and Phase II development. The Draft EIR should consider the entirety of the Project (Phase I and II) for potential conflicts with the Torrance General Plan, including Land Use Element Policies 2.3, 2.5, 3.1, and 11.1. These policies require the analysis to consider and demonstrate with visual aids/exhibits the potential Project impacts on surrounding property, specifically to the residential neighborhood to the east, and the potential impacts of these existing uses to the Project. The analysis should consider and demonstrate with visual aids/exhibits the potential impacts



to landscape and hardscape buffers, specifically the slope between the Project site and the residential neighborhood to the east, to minimize adverse effects where appropriate. The Draft EIR should also consider methods to mitigate potential conflicts with the Torrance General Plan to achieve consistency in scale, mass, and character with structures in the surrounding area, and visual and functional compatibility with the existing residential neighborhood to the east. The analysis should consider and demonstrate with visual aids/exhibits repositioning the RCFE building further west with each floor stepping back farther from Flagler Lane as building height increases.

#### *Section 3.1.4 Impact VS-3*

The Draft EIR states that exterior lighting will be directed or shielded so as not to disturb neighboring residential properties. This should include surface level parking lot lighting, as well as building or landscape lighting. Any lighted signage should not be too bright to cause a nuisance to neighboring residences. Impact VS-3 should include additional analysis to consider the potential Project impacts on surrounding property, specifically to the residential neighborhood to the east. The Draft EIR should demonstrate with visual aids/exhibits the increased lighting associated with the Project during nighttime construction and operation. The analysis should consider methods to mitigate potential impacts including a well-developed lighting plan and requirements for post-construction field measurements, and should consider repositioning the RCFE building further west with each floor stepping back farther from Flagler Lane as building height increases.

#### *Section 3.1.1 Sensitive Uses in the Project Vicinity / Section 3.1.4 Impact VS-4*

Identification of the potential impacts to existing solar collectors atop single-family residences is incomplete. Impact VS-4 should include additional analysis to consider the potential Project impacts on surrounding property, specifically to existing solar collectors atop single-family residences located in the residential neighborhood to the east. The Draft EIR should consider the potential impacts to existing solar collectors atop single-family residences near to the Project site, which are located at 5662 and 5629 Towers Street, within 180 feet and 510 feet, respectively, east of the Project site within the shade contour. The analysis should also consider the potential impacts to future solar collectors near to the Project site within the shade contour and the potential impacts to energy. The analysis should consider methods to mitigate potential impacts including requirements for post-construction field measurements, and repositioning the RCFE building further west with each floor stepping back farther from Flagler Lane as building height increases.

### **Biological Resources**

#### *Phase 1 Proposed Project Landscape Site Plan*

Urban coyotes are present in the region and in the area of the proposed project. Urban coyotes pose a threat to domestic pets and human pet handlers. Mitigation of urban coyotes includes reducing attractive habitat, including foliage areas used for denning, birthing, and rearing. The proposed Project is situated within a known travel corridor for urban coyotes between Dominguez Park and Wilderness Park. The proposed Project includes a landscape plan (pg. 115) that calls for a landscape buffer using a shrub and groundcover plant mix (feature no. 13). The proposed Project's structure bordering Flagler Lane would provide ample shade and privacy that when combined with a groundcover plant mix on the slope, would likely attract urban coyotes for use as a denning location. This could result in an unanticipated influx of urban coyotes into the Torrance residential neighborhood and pose a threat to domestic pets and pet handlers. It is recommended that the landscape buffer along Flagler Lane not utilize a shrub and groundcover plant mix. As an alternative, it is recommended that the proposed project consider California native plant species and drought tolerant planting, planted in a wide pattern within a synthetic or natural wood chip base or similarly exposed planting plan that is not attractive habitat for urban coyotes.

### **Geology and Soils**

#### *Section 3.6.1 Landslide and Slope Instability / Section 3.6.4 Impact/Mitigation Measure GEO-1*

The Draft EIR neglects to identify and analyze the slope bounding the Project site to the east and the series of retaining walls within the City of Torrance right-of-way along Flagler Lane and Flagler Alley. The Draft

EIR should include a slope stability analysis (i.e. global static stability, global seismic stability, and surficial stability) to consider the potential Project impacts on the slope and series retaining walls and to surrounding property. The analysis should consider methods to mitigate potential Project impacts that could cause a landslide including greater building setbacks from top of slope and new or reinforced retaining walls along the slope or regrade slope to a 2:1 (H:V) max. If slope reinforcement is found to be necessary, the analysis should include a construction cost estimate and identify which Agency (i.e. BCHD, Redondo Beach, or Torrance) will carry responsibility. The analysis should also consider and demonstrate with visual aids/exhibits repositioning the RCFE building further west with each floor stepping back farther from Flagler Lane as building height increases to minimize the potential adverse effects.

### **Hazards and Hazardous Materials**

#### *Section 3.8.4 Impact HAZ-5*

As previously commented, coordination with the Torrance Fire Department and the Torrance Police Department is required to prepare an Emergency Response Plan should emergency access to the campus on Flagler Lane continue to be proposed, which is located in the City of Torrance.

### **Land Use and Planning**

#### *Section 3.10.4 Impact LU-1*

Impact LU-1 is not consistent with the Torrance General Plan and conflicts with the Torrance Municipal Code. As previously mentioned, the Draft EIR identifies the RCFE building will change the visual character of the Project site and surrounding areas, and identifies the RCFE building would be more visually prominent, substantially taller than the existing buildings onsite, and larger than buildings in the vicinity. Phase II development would include construction of additional buildings that are taller and have more massing than existing buildings in the Project vicinity. The Draft 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 not the RCFE building and Phase II development. The Draft EIR should consider the entirety of the Project (Phase I and II) for potential conflicts with the Torrance General Plan, including Land Use Element Policies 2.3, 2.5, 3.1, and 11.1. These policies require the analysis to consider and demonstrate with visual aids/exhibits the potential Project impacts on surrounding property, specifically to the residential neighborhood to the east, and the potential impacts of these existing uses to the Project. The Draft EIR should consider additional methods to mitigate the potential Project impacts such as repositioning the RCFE building further west with each floor stepping back farther from Flagler Lane as building height increases.

The Draft EIR must include Torrance Municipal Code 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. Torrance Municipal Code Section 92.30.3 must also be included to address the potential impacts on surrounding property, specifically the residential neighborhood to the east across Flagler Lane, from the proposed exterior loading, unloading and storage areas, and trash storage areas along Flagler Lane.

As identified in Section 2.2.5 of the Draft EIR, the eastern portion of the Project site is located within the City of Torrance, and therefore development associated with the RCFE Building, such as the retaining walls located in the right-of-way, is subject to Torrance Municipal Code Section 92.13.12(d), which states that no fence, wall or hedge shall exceed eight feet and five feet in height, respectively. Any fence or retaining wall greater than eight feet and five feet in height, respectively, is subject discretionary review by the Torrance Planning Commission (and Torrance City Council on appeal).

The Draft EIR understates the conflict with access to Flagler Lane, which is prohibited per Torrance Municipal Code Section 92.30.8. The analysis should consider more carefully other Project alternatives that do not access Flagler Lane.



## Noise

### *Construction Noise Levels / Section 3.11.5 Impact/Mitigation Measure NOI-1*

Per Torrance Municipal Code Section 46.3.1 construction is prohibited on Sundays and Holidays observed by City Hall. The Draft EIR should specify in MM NOI-1 that construction is prohibited on Sundays and Holidays observed by Torrance City Hall, and that the arrival times of workers, construction vehicles and materials should adhere to the allowable hours as specified. The Draft EIR should identify which Agency (i.e. BCHD, Redondo Beach, and Torrance) will enforce construction noise violations and respond to noise complaints. The Draft EIR should also consider 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. Doing so may provide the best opportunity for mitigating significant and avoidable construction noise impacts. In addition, as previously commented Figure 2-10 Construction Haul Routes and the proposed construction haul route for Phase II are not 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 noise analysis should be reviewed for consistency with the Torrance General Plan Circulation & Infrastructure Element Figure CI-3 Truck Routes and Rail Lines.

### *Operational Noise Levels / Section 3.11.5 Impact/Mitigation Measure NOI-3*

Per Torrance Municipal Code Section 46.7.2(c) residential and commercial noise limits are adjusted during certain noise conditions. The Draft EIR should consider these noise limit adjustments to identify potential operational noise impacts such as from mechanical equipment, outdoor events, and the proposed parking structure. The analysis should consider additional methods for mitigation such as requirements for a well-developed noise attenuation plan and post-construction field measurements, and should consider restricting amplified noise at outdoor events to be allowed 7:00am to 7:00pm Sunday through Thursday and 7:00am to 10:00pm on Friday and Saturday, and limiting the number of outdoor events altogether. The Draft EIR should also consider other methods to reducing operational noise impacts such as repositioning the RCFE building further west with each floor stepping back farther from Flagler Lane as building height increases. The Draft EIR should also consider additional methods to mitigate operation noise emitted from the proposed parking structure, such as: driving surfaces should be covered with material that reduces noise from tires (screeching); and the parking structure exterior should be lined with screening materials (e.g. screen wall with planters) to reduce noise emitted from car alarms, doors closing, and radios. An acoustical consultant should be required to recommend mitigation measures to lessen the effects of noise from the structure.

## Transportation

### *Access to Flagler Lane / Torrance Municipal Code Section 92.30.8*

Eliminate the proposed driveways on Flagler Lane from the design (i.e. implement Alternative 3). Reflect this change throughout the entire EIR and all appendices. Per Torrance Municipal Code Section 92.30.8, “no vehicular access shall be permitted to a local street from a commercially or industrially zoned through lot which also has frontage on a major or secondary street. In no case shall a commercial or industrial lot be developed in such a manner that traffic from the commercial or industrial uses on it will be channeled onto any residential streets.” The Draft EIR (p. RG-18) implies this provision does not apply to the Project because it is not a land use within the City of Torrance. The City maintains its authority to apply the Torrance Municipal Code to a road within its right-of-way. Flagler Lane south of Beryl Street is a local street, and adding commercial driveways on this road segment will be a violation of the City’s Municipal Code and will conflict with the City’s General Plan.

Also, clearly state that the City’s trial implementation of a one-way traffic restriction on Flagler Lane is not related to the proposed development and should not be construed as a mitigation for any cut-through traffic that the proposed development will introduce.

### *BCHD Bike Path Project*

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 (MSIP) 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.

### *Construction Haul Routes (Draft EIR p. 2-42)*

As previously commented, Figure 2-10 Construction Haul Routes and the proposed construction haul route for Phase II is not 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 transportation analysis must be reviewed for consistency with the Torrance General Plan Circulation & Infrastructure Element Figure CI-3 Truck Routes and Rail Lines. The construction haul routes must avoid Torrance streets to the maximum extent possible and Torrance local collector streets entirely.

### *Vehicular Site Access (Appendix p. J-7)*

Remove the driveway on Flagler Lane. Revise the project trip distribution to eliminate all project trips assigned to Flagler Lane.

### *City of Torrance Standards for Intersection Operational Evaluation (Appendix p. J-16)*

Make the thresholds consistent with those provided by the City of Torrance in its July 29, 2019 comment letter (Appendix p. A-164).

### *Existing Roadway Facilities (Appendix p. J-18)*

Provide additional information that Flagler Lane south of Beryl Street is a local street.

## **Public Services**

As previously commented, coordination with the Torrance Fire Department and the Torrance Police Department is required to prepare an Emergency Response Plan should emergency access to the campus on Flagler Lane continue to be proposed, which is located in the City of Torrance. Flagler Lane south of Beryl Street is a local street, and adding commercial driveways on this road segment will be a violation of the City's Municipal Code and will conflict with the City's General Plan.

## **Alternatives**

### *Section 5.5.3 Alternative 3 – Revised Access and Circulation*

As previously commented, clearly state that the City's trial implementation of a one-way traffic restriction on Flagler Lane is not related to the proposed development and should not be construed as a mitigation for any cut-through traffic that the proposed development will introduce.

Also, the Draft EIR should consider repositioning the RCFE building further west with each floor stepping back farther from Flagler Lane as building height increases. Doing so may provide the best opportunity for mitigating the potential impacts, and altogether prevent significant and avoidable impacts.

### *Section 5.5.6 Alternative 6 - Reduced Height Alternative*

The Draft EIR should include visual aids/exhibits a three-dimensional model of Alternative 6 to demonstrate the reduced height alternative. As previously commented, the Draft EIR should consider repositioning the RCFE building further west with each floor stepping back farther from Flagler Lane as building height increases. In addition, eliminating the proposed driveways on Flagler Lane from the design. Doing so may provide the best opportunity for mitigating the potential impacts, and when combined, may prevent significant and avoidable impacts.

### *Section 5.6 Identification of Environmentally Superior Alternative*

Table 5.5.-5 Impact Comparison of Alternatives to the Proposed Project (also shown as Table ES-2 Identification of Environmentally Superior Alternative) does not include the impact comparison of Alternative 6 to the proposed Project. The Draft EIR should be reviewed to include Alternative 6 in the impact comparison of alternatives to the proposed Project.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:51 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Beach Cities Health District Healthy Living Campus Project, DEIR No. 2019060258  
AKA HLC Draft Environmental Impact Report ("DEIR")  
**Attachments:** Phase 2 Data Flaws in the DEIR.docx

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**From:** B W <brianjwolfson@gmail.com>  
**Sent:** Thursday, June 10, 2021 11:05 AM  
**To:** EIR <eir@bchd.org>  
**Cc:** Bill.brand@redondo.org <Bill.brand@redondo.org>; todd.loewenstein@redondo.org <todd.loewenstein@redondo.org>; nils.nehrenheim@redondo.org <nils.nehrenheim@redondo.org>; christian.horvath@redondo.org <christian.horvath@redondo.org>; laura.emdee@redondo.org <laura.emdee@redondo.org>; zein.obaji@redondo.org <zein.obaji@redondo.org>; eleanor.manzano@redondo.org <eleanor.manzano@redondo.org>; joe.hoefgen@redondo.org <joe.hoefgen@redondo.org>; PFurey@TorranceCA.Gov <PFurey@torranceca.gov>; GChen@TorranceCA.gov <GChen@torranceca.gov>; MGriffiths@TorranceCA.Gov <MGriffiths@torranceca.gov>; AMattucci@torranceca.gov <AMattucci@torranceca.gov>; HAshcraft@TorranceCA.Gov <HAshcraft@torranceca.gov>; SKalani@TorranceCA.Gov <SKalani@torranceca.gov>; CityClerk@torranceca.gov <CityClerk@torranceca.gov>  
**Subject:** Beach Cities Health District Healthy Living Campus Project, DEIR No. 2019060258 AKA HLC Draft Environmental Impact Report ("DEIR")

Dear Mr. Meisinger:

In addition to other comments I have filed, enclosed are some additional public comments regarding why I find the DEIR inadequate and incomplete, and lacking sufficient mitigations to ensure the environmental safety of Torrance and Redondo Beach residents who will suffer most if this project is approved.

Upon receipt, I would greatly appreciate it if you would confirm receiving the attached public comments as I have not heard back from you regarding the previous public comments I have submitted to you.

Thank you,

Brian olfson

City of Torrance

Nick Meisinger re: Healthy Living Campus Wood Environment & Infrastructure  
Solutions, Inc.  
9177 Sky Park Ct.

San Diego, CA 92123

Regarding: Beach Cities Health District Healthy Living Campus Project, DEIR No.  
2019060258  
AKA HLC Draft Environmental Impact Report ("DEIR")

Dear Mr. Meisinger:

BW3-1

In addition to other comments I have filed, enclosed are some additional public comments regarding why I find the DEIR inadequate and incomplete, and lacking sufficient mitigations to ensure the environmental safety of Torrance and Redondo Beach residents who will suffer most if this project is approved.

BW3-2

CEQA Regulation(s): Section 15126 states in part: "Significant effects of the project on the environment shall be clearly identified and described." Section 15123 states in part: "an EIR shall identify areas of controversy known to the lead agency, including issues raised by public agencies as well as interested members of the public." CEQA Reference(s): Sections 15126.2(b) states in part: "In addition to building code compliance, other relevant considerations may include, among others, the project's size, location, orientation, equipment use and any renewable energy features that could be incorporated into the project."

Section 15092, subsection (b)(2)(A) states in part: “A public agency shall not decide to approve or carry out a project for which an EIR was prepared unless... 2) the agency has... eliminated or substantially lessened all significant effects on the environment where feasible.” Additionally, 1. Designation of an environmental impact as significant does not excuse the EIR’s failure to reasonably describe the magnitude of the impact. 2. An EIR’s designation of a particular adverse environmental effect as “significant” does not excuse the EIR’s failure to reasonably describe the magnitude of the impact.

I am greatly concerned that this is the case with the traffic and greenhouse gas analysis as presented in section 3.14, page 39, BCHS Project DEIR. I am alarmed that there is a rush to approve the Project but hopeful the BCHD Board of Directors, together with Wood Environment & Infrastructure Solutions and the team of consultants including Fehr and Peers, who prepared the DEIR will withdraw the DEIR or recirculate it after the flawed data is corrected.

As noted in section 3.14, page 39 the DEIR states the Phase two Aquatic Center trip generation estimates were not completed by the team hired to conduct the analysis but instead, the team used preliminary findings. In a recent court case [Ref: <https://www.rmmenvirolaw.com/sierra-club-v-county-of-fresno>] the EIR was deemed insufficient because it identified significant air quality impacts but failed to gather accurate data, creating a serious flaw in the mitigation measures.

DEIR page 757 (3.14-39) states in part: “Trip generation estimates for new uses were based on available programming information provided by BCHD. ITE does

BW3-2  
(cont.)

not provide a trip generation rate for aquatic centers such as the one proposed as part of the Phase 2 development program. Therefore, BCHD hired Ballard King & Associates to prepare a market feasibility study, which includes preliminary findings of the market assessment used by Fehr & Peers to estimate potential trip generation (see Appendix J).” [Appendix J-Non-CEQA Intersection Operational Evaluation.pdf \(bchdfiles.com\)](#)

This section of the Phase 2 analysis in the DEIR and the supporting documentation is a bag of hot potatoes. It is hard to ascertain accurately who ended up holding it, but the story goes something like the following: i. Fehr & Peers was given the responsibility by BCHD to estimate Phase 2 potential trip generation. ii. However, ITE, the original traffic analysis contractor, did not provide a trip generation rate for aquatic centers such as the one proposed as part of the Phase 2 development program. This was required and had to be done. As DEIR page 854 (5-8) states:

“...following the development under Phase 2, the proposed project would result in an increase in daily trip generation associated with the Aquatics Center ...” iii So, as DEIR page 757 (3.14-39) states: “BCHD then hired Ballard King & Associates to prepare a market feasibility study which included preliminary findings of a market assessment.” The firm’s profile [Ref: <https://ballardking.com/firm-profile/> ] states: “Ballard King offers a broad range of services that can be integrated into a design team or contracted independently. Some of our services include feasibility studies, operations analysis, maintenance cost estimates, revenue projections, staffing levels, budgeting, marketing plans, and third-party design review. Additionally, we perform audits for existing facilities as well as recreation master plans.” In response to the BCHD request for proposals for the Aquatic Center

BW3-2  
(cont.)



BW3-2  
(cont.)

feasibility assessment, Ballard King stated on its website, “The scope of worked included: market assessment, public participation, facility recommendations, and operational planning.” iv. Just to be clear, Ballard King was not hired to conduct an engineering-based traffic analysis. They do not claim to be qualified to do so! The methodology used by Ballard King is stated clearly in DEIR Appendix J – Appendix

BW3-3

C: pages 67-8 (J-66-7). v. Evidently, the plan was for Ballard King to use data provided by the South Bay Aquatics Center (SBAQ), located in Redondo Beach, in conjunction with their market assessment to develop aquatic center trip generation estimates. However, SBAQ had not been operating with regular class schedules recently due to COVID-19. Vehicle counts were unable to be collected. No reliable data was available for validating the trip generation estimates. DEIR Appendix C of Appendix J, page 41 (J-40) includes the memorandum prepared by SBAQ that states this fact. On DEIR Appendix C of Appendix J, page 67 (J-66) Ballard King states that there was not a sufficient sample size that could be used as “reliable” counts. vi. Evidently, in BCHD’s rush to get the DEIR published rapidly, no matter what, Ballard King was then directed to use another engineering light-weight, the National Sporting Goods Association (NSGA) [Ref:

BW3-4

<https://www.nsga.org/research/nsga-research-offerings> ] The NSGA routinely approximates the number of people in a geographic area who might participate in recreational activities like swimming, be it in a pool or the ocean.

The NSGA conducts annual surveys of how Americans spend their leisure time. In particular, they collect data by age range (7 and up), median household income, and region of the country. Using the age distribution of the primary service area,

BW3-4  
(cont.)

combined with median household income, region of the country, and national average, Ballard King produces a participation percentage unique to the characteristics of the primary service area. An explanation of the methodology used by the NSGA to generate their 2017 data set [Ref: <https://www.nsga.org/globalassets/products/product-images/single-sport-participation-2017-edition---example.pdf> ] states: "An online panel maintained by Survey Sampling International (SSI) was used. The panel is balanced on a number of characteristics determined to be key indicators of general purchase behavior, including household size and composition, household income, age of household head, region, and market size. Due to the online methodology African Americans and Hispanics are somewhat underrepresented in the sample." The NSGA information made no claims it could be used to determine the transportation impacts of the Aquatic Center's GHG emissions. For the BCHD service area used by NSGA, this equates to an average of 16.6% of the beach city population that participate in swimming. The NSGA does not further define swimming, nor do they define if this is pool use, ocean, lake, etc. Ballard King takes a 16.6% figure provided by NSGA and applies it to the population of the primary service area that is age 7 and up. It turns out that within the primary service area 86,145 individuals, age 7 and up, participate in swimming." Such an approach as the one described here does not produce the factual data CEQA requires for analysis. The regional data is not a specific factual survey of Beach city households. The Aquatic Center trip generation table is not representative of the methodology used by Fehr & Peers.

Where are the local data sets showing NSGA conducted a data-based study on the Project area? BCHD has not eliminated or substantially lessened all significant effects on the environment because it has not provided the information required to determine a believable mitigation measure. Fehr & Peers, by their own admission, make it abundantly clear that the data was not available to them and that they can't provide the CEQA required level analysis that must be made to justify the determination that an environmental impact with or without a mitigation is less than significant. vii. As a result, the traffic estimates in the DEIR for Phase 2 are general, low-quality estimates – certainly not sufficient for the purposes of CEQA.

BW3-4  
(cont.)

An EIR cannot merely lie behind the excuse that data is not available. It must be provided, and the appropriate analyses then made. As things stand now, BCHD has not eliminated or substantially lessened significant effects on the environment where feasible because it has not provided the information required to determine a feasible mitigation measure. [see: DEIR Traffic Mitigations]

Conclusion: The EIR must provide analyses with enough substance to access accurately the impact of the HLC on Traffic Impacts and GHG emissions. The DEIR Transportation/Traffic Analysis is Deficient. The explanation of traffic metrics and their justifications is inadequate. The traffic analysis for the EIR must be redone along with all other sections that are affected by the unreliable, unsubstantiated data.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:56 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD EIR comments

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**From:** Carl Paquette <cdp56c@verizon.net>  
**Sent:** Thursday, June 10, 2021 4:30 PM  
**To:** EIR <eir@bchd.org>; Communications <Communications@bchd.org>; Bruce Steele <litespeedmtb1@verizon.net>; Ann Cheung <acheungbiz@gmail.com>; GChen@torranceca.gov <GChen@TorranceCA.Gov>  
**Subject:** BCHD EIR comments

After browsing the 971 pages of the EIR draft, I would like to submit a few comments:

- CP-1 | 1. I was under the impression that the driveway on Flagler Lane had been deleted from the plan. We do not need any more traffic in our neighborhood.
- CP-2 | 2. I see a lot of "Less than significant" and "Not anticipated to be significant" impacts. A lot of little things add up. A pound of feathers weighs as much as a pound of lead.
- CP-3 | 3. Increase in population in Redondo Beach and Torrance well within forecasted population growth for the region and would not induce substantial population growth. So I guess the required employee increase would be living outside the area. Makes sense, our grandchildren had to move to other states because they could not afford the housing here. If my wife was not an original owner, I doubt we could have afforded to live here.
- CP-4 | 4. As far as traffic mitigation . . . according to page ES-38 you are going to encourage employees to ride their bicycles to work. Wow, the 110 and 405 freeways are probably going to be jammed with two-wheelers if the employees are not going to contribute significantly to the population growth here.
- CP-4 | 5. The new plan calls for the 7-story building. I am not an environmental expert but I anticipate more of a shadowing effect, more of a breeze blocking effect and more of a general view-obstructing effect than the study reflects. Could this be some of the "Not anticipated to be significant" impacts?

Respectfully submitted,

Carl Paquette  
[cdp56c@verizon.net](mailto:cdp56c@verizon.net)  
5656 Towers Street  
Torrance, CA 90503

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:42 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: comment on BCHD environmental impact report

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**From:** Cecilia Raju <cecchang@gmail.com>  
**Sent:** Wednesday, June 9, 2021 1:01 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** comment on BCHD environmental impact report

Dear Nick Meisinger and the board of BCHD,

CR-1 Where do I start? There are so many reasons that I, and my fellow neighbors, are concerned about this massive project. Let's start off with the air quality/pollution effects. With the size and depth of excavation needed to accommodate the subterranean parking, as well as the volume of demolition of existing buildings, how can you know, with any certainty, what sort of particulates and toxic chemicals may be unearthed as a result? There is also an admittance that a list of mitigation measures will need to be enacted in order to allow for the air quality impact to fall to less than significant. How are we to know that that extensive mitigation list will not only be followed, but followed consistently? Who will enforce that? The city? Not to mention that adding all those mitigation factors adds time (and also a LOT of water) which prolongs the construction period and cost. Why wouldn't there be an incentive on BCHD's part to overlook, or simply not follow through, with those mitigation efforts? Even in the best case scenario where those mitigation factors are enacted, undoubtedly there will be an increase in air pollution from the norm, which is not justifiable, in my opinion, when the results of that increase may lead to a decrease in quality of life for the most vulnerable - the young and the elderly. As the EIR has noted, there are several schools within close proximity of the construction site. As well as a few parks. The closest school (Towers Elementary) being a mere 350 feet away and downwind of the construction site. This is unacceptable. The EIR states that all the air particulates and emissions will be below threshold levels. Does the report also take into consideration that many construction vehicles will be in the area contributing to the air pollution? Just because the projected levels (which I have my doubts about) are below the city/county threshold, that does not mean that years on end of said acceptable level will not cause harm to vulnerable populations, namely children.

CR-2 Even if the increased particulates in the air does not do enough harm, the constant noise definitely will. The EIR has stated that the noise cannot be mitigated. How are these children expected to learn and play in an environment filled with dusty air and constant noise? How are the teachers supposed to teach children, who by now have mostly fallen behind due to a lost year from the pandemic, supposed to teach with that added stress? What about all those people who now work from home?

CR-3 The congestion that will inevitably result from the scope and duration of this project cannot be downplayed. The EIR states that initially there will be a net negative amount of vehicular trips made daily due to there not being a campus, so to speak, to visit, and that the amount of trucks to the construction site will be less than the average amount of cars to that site. So you are replacing a greater volume of cars with a smaller volume of trucks. I do not feel that is any sort of a net improvement. Especially when you consider that the immediate streets surrounding the campus are small streets and not meant to accommodate heavy-duty trucks. Lots of cars in the area are passing through, not visiting the campus. The long-term effects, as stated in the EIR cannot be determined to be less than significant. I can state with a

CR-3 (cont.) | good amount of certainty, that traffic and congestion following this project will increase significantly. It does not take any sort of fancy analysis to come to that conclusion.

CR-4 | We, in the surrounding neighborhood, are asked to put up with dirty air and constant noise and also an increase in traffic and congestion, just so that this monster of a campus with an unneeded high-end assisted living facility can be built to generate revenue for BCHD? How is that not detrimental to our well-being? Not to mention that there are uncertainties regarding future phases of this project that have not been ironed out. I implore you to think of how much damage will be done by this project and how many ordinary lives you will be adversely affecting. There must be another way to accomplish economic viability without causing harm to the neighborhood. Please rethink this project for the sake of the many families here and their young children.

Thank you for your time,  
Cecilia Raju

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 2:00 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD EIR COMMENTS

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**From:** Geoff Gilbert <geoffgilbert2248@aol.com>  
**Sent:** Thursday, June 10, 2021 4:55 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Fwd: BCHD EIR COMMENTS

To BCHD:

Diamond St. cul de sac omitted from DEIR

### **BCHD borders omit Diamond St. cul de sac**

There is no mention in the DEIR of the visual and aesthetic impact, the environmental impact or of any mitigation for the residents of the Diamond Street cul de sac. This property is on BCHD's southeast border, 50 feet away from the Project.

The DEIR is incomplete and inaccurate rate in describing the southeast border of the Project. The property that is directly adjacent to the BCHD Project southeast border is commonly referred to as the "Diamond St. cul de sac". It consists of a residential block of single family homes with addresses from 1400 to 1410 Diamond in Redondo Beach.

This omission can result to not fully comprehending and analyzing the impact of the Project on the residents of the **Diamond St. cul de sac**. Being in such close proximity, these residents are most vulnerable to the effects the BCHD Project. Throughout the DEIR, this property is omitted, and there doesn't appear to be any mitigation offered.

CG-1 Description of Diamond cul de sac and "green buffer" hillside:

The Diamond Street cul de sac is a residential one way street, with single family homes on one side. A 4 foot wide sidewalk borders the homes. The other side of the street is a hillside which is BCHD property. Both the cul de sac street and the hillside provide a buffer between the residential neighborhood and the BCHD. The BCHD and the residents of the Diamond St. cul de sac, referred to this hillside as a "green buffer" (or "green space" and "green zone"). It is partially landscaped with trees and is maintained by BCHD. This green buffer currently helps to mitigate the visual and aesthetic impact of the current BCHD buildings and parking. It also acts as a barrier for some of the noise. It is much appreciated by the residents which helps to maintain the character of the neighborhood. This green buffer has been in existence since the homes on the Diamond St. cul de sac were developed. For most of that almost 56 years of time, there was no fencing separating the Diamond St. cul de sac from the green buffer one and the area was used as a playground by the area children.

### **Description of Diamond St. as given in DEIR is not the portion that borders BCHD**

The description of the southeast border given in the DEIR does not mention the Diamond St. cul de sac at all. It portrays



both in the photo and written description, a different section of Diamond Street on the *opposite* side of Prospect, further away from the Project which does not border on it directly. **It is very different in character and kind than the Diamond Street cul de sac.** It is a two way street with a third, turning lane. There are single family homes, multi- family homes and a high school. It is not a quiet, cul de sac street. There is no hillside or “green buffer”. It is not directly adjacent to BCHD.

**Also, the DEIR description given of Diamond St. the other side of Prospect is inaccurate.**

The DEIR states that there are “several schools” on Diamond where there is only one, Redondo Union High. Here is the description of Diamond St. quoted from the DEIR:

*“To the southeast, the Project site is bounded by Diamond Street, a three-lane roadway with one lane in each direction and a center left-turn lane. Diamond Street includes approximately 5-foot- wide pedestrian sidewalks lined with mature eucalyptus (Eucalyptus spp.) and palm trees. Diamond Street supports single-family residential, low-density multi-family residential, and several schools, including the Redondo Beach Learning Academy, Redondo Union High School, and Redondo Beach High School. Due to the rolling topography and large street trees, intermittent views of the open sky and Pacific Ocean are visible from Diamond Street.”*

In fact, Redondo Union High School is the only school on Diamond. There is no Redondo High School. The Redondo Beach Learning Academy is on Del Amo Blvd. not Diamond. It is a small private school with approximately 7 students. By omitting the Diamond St. cul de sac, the DEIR completely ignores the residents closest to the borders of the BCHD campus.

## Visual and Aesthetic Impacts

Another property on the same side of the BCHD as the Diamond cul de sac, is “Flagler Alley”. Where Diamond Street cul de sac ends, Flagler Alley begins. This is a bicycle and pedestrian paved path which is extensively used by school children going to Redondo Union High, Parras Middle and Beryl Elementary Schools (all in the Redondo Unified School District). There are 2 clear photographs and a detailed description given of Flagler Alley and the views. It is referenced throughout the DEIR.

While the views and description of Flagler Alley are discussed in section 3.1, there are no such photos or description of the Diamond Street cul de sac. **There is nothing to show the visual and aesthetic impact in section 3.1. for the Diamond St cul de sac.**

Hillside feature not referenced with regard Diamond cul de sac

The hillside is a feature that runs along the Diamond cul de sac and Flagler Alley, providing the green buffer between BCHD and the residential areas. Part of the hillside is between BCHD’s property and the Diamond St. Cul de sac. The hillside along Flagler Alley is within Torrance’s jurisdiction and is maintained by Torrance. **The hillside, the “green buffer”, between BCHD and the Diamond cul de sac street is not mentioned in 3.1.**

## Representative views do not include Diamond cul de sac

The representative views selected to show the Project from the east, skip over and ignore the Diamond St. cul de sac. The DEIR shows residential homes to the east as being in Torrance. There is a reference to Diamond Street as public land but no acknowledgement in 3.1 that there are residential homes in Redondo Beach directly adjacent to BCHD on the southeast side. The Diamond St. cul de sac residents are the closest to the BCHD campus and are currently much more affected by the BCHD. They would be much more impacted by the Project than those on Tomlee Street but are not part of the DEIR.

## Aesthetics not addressed

The failure to define the Diamond cul de sac as part of the southeastern border of the Project have resulted in a lack of consideration and mitigation throughout the DEIR for those families that reside there.

The aesthetics and visual impact has not been addressed for a relatively quiet, strictly single family residential, one way cul de sac street directly across from the BCHD Project.

## Visual and aesthetic impact from Electrical Substation and Removal of 20 trees

There was a request for public records on the proposed 4kV Electrical Substation that is shown as being built on the current "green buffer" hillside between BCHD and Diamond cul de sac residential homes. The response is that there are no additional records. There is no detail about this substation. This substation is clearly illustrated in the "Rendering" of the Campus in the BCHD EIR web page. The substation appears to cover a significant if not most of the green buffer area, yet there are no specifications of this electric yard except that "an additional 20 trees" are to be removed to accommodate its construction. This will effectively remove all of the trees in the green buffer between the Campus and the Diamond St. cul de sac destroy the natural buffer now enjoyed by the residents. There is no mitigation provided in the DEIR to the tree removal or the restoration of the green buffer zone.

The residents will have nothing separating them from the much larger and higher buildings proposed in the new campus, which negatively affects their daily and nightly views from their front yards.

From 3.3.4 of the DEIR "Biological Resources and mitigation measures"

"Additionally, construction under Phase 1 would require removal of an additional 20 landscaped trees along Diamond Street to provide space for the SCE Substation Yard."

The visual and aesthetic impact of removing trees on this hillside would severely impact the "green buffer". Trees would be needed more than ever if the Project is approved. If 20 trees are removed, the current hillside would be effectively be bare. Not only will this ruin the present visual and aesthetic impact afforded by the green buffer, it will seriously impact the value of the residential property.

## Environmental impact of the Electric Substation to the Residents is not addressed in the DEIR

The DEIR does not address the environmental impact to the (Diamond St. cul de sac) residents for this substation in sections 3.2, 3.11, and 3.8.

### Unaddressed HAZARDS from the SCE Substation Electric Yard

The residents' homes are within 50' of this substation. There are concerns about EMF, cancer and noise but there is no mention of this in the DEIR. There is nothing indicating and effect on noise and air quality.

### Unaddressed Noise Impact:

The DEIR does not address or offer mitigation or consideration of any possible NOISE impact from the loss of the green buffer space trees and foliage.

Certainly this natural sound barrier deadens the sound from campus vehicles, people, and day to day operations. This subject is not in the DEIR with respects to the green buffer zone or the SCE Substation.

### Light Pollution

Light pollution caused by the taller buildings, parking structure is not properly addressed in the DEIR. It certainly is not covered in the loss of and additional 20 trees

in the green buffer zone for the construction of the SCE Substation. Directional lights are supposed to mitigate light pollution however complaints by Diamond St. cul de sac residents

of light pollution shining in bedrooms windows have never been mitigated with these measures to the satisfaction of the residents.

### Potential Toxic Water and Mud Runoff and Fugitive Dust:

Due to the 60+ years of commercial site use, medical hazardous waste, and the known toxic dry cleaning fluid in the soil, the Diamond St. cul de sac neighbors are in the path

of toxic potential mud and water flows during construction. Once BCHD disturbs the trees and ground cover, Diamond cul de sac will receive water flows, mud flows, and

blowing dust. Because of the known carcinogens in the soil this is a very serious health hazard to the adjacent residents and a much greater level of mitigation and active management than proposed in the DEIR must be considered. As a health district, BCHD cannot put the health of adjacent residents at such high cancer and other risks.

### Biological Resources Environmental Risks:

3.3.4 of the DEIR "Biological Resources and mitigation measures did not include or address the biological impact that potential toxic water and mud runoff will have

CG-11 (cont.) with the street drainage running to the ocean from the end of the Diamond St. cul de sac. This is a potential major pollution risk to all ocean wildlife and to humans how use the beaches or fish the ocean waters.

## Summary

CG-12 The Diamond Street cul sac residential area is not defined as being on the southeast border the BCHD Project, nor included in the DEIR. Analysis of the visual, aesthetic, and environment impacts are incomplete for these residents. The DEIR does not address specific impacts or mitigation for these Redondo residents who live closest to the BCHD Project. As a result the DEIR is incomplete and therefor flawed.

The residents of the Diamond St cul de sac, respectfully request that BCHD, "put us back on the map", and conscientiously analyze and mitigate the Project impacts on your closest of neighbors as well as the ocean wildlife.

Sincerely,  
Charlene Gilbert  
1406 Diamond St.  
Redondo beach

June 6, 2021

DEIR

Re: Proposed BCHD Expansion Project

Dear DEIR Representative:

My name is Chiaki Imai. I have been a resident and home owner of West Torrance for 26 years. I am strongly opposed to BCHD project following reasons:

- CI-1 | 1) Noise...the project will last for 5 years. During this long duration, all nearby residents will have to endure the loud construction noise at their homes which will cause great discomfort and health related problems like excessive stress.
- CI-2 | 2) Air Quality...many residents don't have air conditioning in my neighborhood, so this means that people will open their windows to catch the ocean breeze, however contaminated air and dust from the BCHD construction site will enter their homes and cause health problems like allergies. Also, residents are will not able to comfortably walk thru the neighborhood and children will not play outside in order to avoid the polluted air during the 5 years of construction.
- CI-3 | 3) Traffic...we already see increased traffic throughout the city, but once the project starts many huge trucks will be traveling through the neighborhood streets where schools are located nearby. This is not safe at all, especially for the school children.
- CI-4 | 4) Project Size...the building is huge and it does not fit the neighborhood decorum at all especially since it will cause many negative impacts to my local living area.

BCHD's project will not serve the community because this place is only for someone who can afford to pay such a high price to live.

- CI-5 | If it is not for the benefit of the local community, then why must so many residents have to endure the hardships from this project for such a long time during construction and afterwards.

We need to save our neighborhood and protect our health and that is why I am strongly opposed to the BCHD project.

Thanks for your time and consideration.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:37 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD Project

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**From:** Chikako Kashino <chako1@aol.com>  
**Sent:** Monday, June 7, 2021 10:02 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** BCHD Project

Hi there:

CK-1 I'm writing to express my opposition to the BCHD project. I love my quiet North Redondo neighborhood, and don't want to deal with noises, traffic, and pollution for over 5 years. I have asthma, so breathing polluted air is the last thing I want to do.

Chikako Kashino  
509 Cluster Lane  
Redondo Beach, CA 90278

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:25 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Comment to BCHD DEIR

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**From:** Kristine Sullivan <kristysullivan9@icloud.com>  
**Sent:** Wednesday, June 2, 2021 1:53 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Public Comment to BCHD DEIR

To whom it may concern,

My husband and I are life long residents in the West Torrance area. We were raised here and have owned a home here going on 27 years. We are appalled that the BCHD project is even being considered. Torrance has always been a city to be proud of and one that listens to its residents.

Some concerns are as follow:

- CKS-1 Air Contamination 3.8 Hazard and Hazardous Materials - There are 11 schools within 300ft. to .5 miles of this site. Many more school aged children are being found to have breathing conditions like Asthma and the dust and contaminants from this site will effect the Air Quality S 3.2.1.5 for all the children and those with respiratory ailments. Many homes in the West Torrance neighborhoods are owned by senior citizens who are more susceptible to respiratory illness. We know that Asbestos has lead to many types of Cancer. All of the toxins will be spread with the wonderful ocean breezes we get.
- CKS-2 3.11 Noise - Again, with all the schools being so close by, the noise will make it much harder to hear in class and be distracting to so many students. The residents all around the area will have constant noise with no relief. Many with Autism have sensitivity to loud noises that will effect them.
- CKS-3 3.14 Transportation - We live off of Anza near Halison and during the school year cannot even get off of our street to get to work. There are back ups at the lights on Halison, Del Amo, Entradero (South and North lights) and 190th to name a few. These backups also occur at school dismissal times and rush hour times. To add big construction trucks and lane closers would be a nightmare. It is already hard to get anywhere in Torrance and the surrounding cities.
- CKS-4 This BCHD proposal is a massive building that does not fit in with the community that surrounds it. It will be a nightmare to all of us that live around it and it will effect our quality of life! We encourage the City of Torrance to listen to its constituents and not big business.

Sincerely,

Chris and Kristy Sullivan  
5013 Deelane St.  
Torrance, 90503





## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:17 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Chris Tuxford- Redondo Beach

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---

**From:** Charlie Velasquez <Charlie.Velasquez@bchd.org>  
**Sent:** Wednesday, April 28, 2021 1:14 PM  
**To:** EIR <eir@bchd.org>  
**Cc:** Cristan Higa <Cristan.Higa@bchd.org>; Dan Smith <Dan.Smith@bchd.org>  
**Subject:** Chris Tuxford- Redondo Beach

Name: Chris Tuxford  
Date: April 22, 2021  
Time: 9:00am  
Fielded call by: Charlie Velasquez

Summarized comment:

No one can afford to go to those things. They want to stay in their homes. They got home care where nurses come and take care of you. Building a senior care is ridiculous. It's a waste of time and money. It is way too big of a project. If you do your homework, the USA is a corporation owned by England's central bank. The Vatican gave it to England and they turned it into a corporation. They want to keep the population in centrally controlled areas. The bill R10 – people want to control the population of the world.

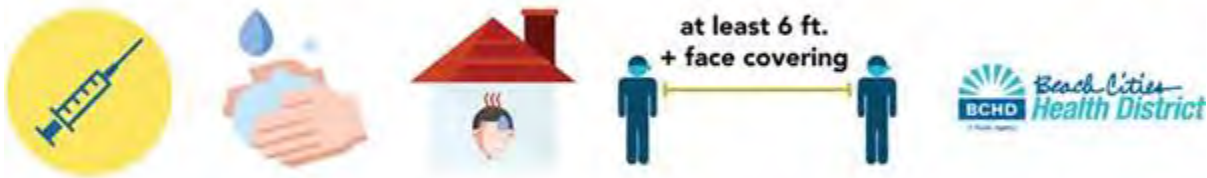
CT-1

Against building this project. Keep it the size that it is. Unless you make it back into a hospital. Am against having any adult living there. It does not make sense. My dad did not want to go there. Grandmother lasted only a week in a place similar and wanted to go back home. Senior care is just a money grab. Video on Youtube called "Plandemic" – in it, which they took off after a day, exposed what they were doing. Bill Gates had a patent on COVID.

No reason to build a senior care. Does not serve as a community service, especially after the pandemic. It's a big waste of money. Keep it as is. Or turn it back into a hospital and add medical services.

Best Regards,  
**Charlie Velasquez**  
*Executive Assistant to the CEO*  
Beach Cities Health District  
Ph: 310 374-3426, x 213  
Fax: 310-376-4738  
[www.bchd.org](http://www.bchd.org)  
[www.facebook.com/beachcitieshealth](https://www.facebook.com/beachcitieshealth)

## Protect Yourself and Others from COVID-19 and the Flu



Get your COVID-19 and flu vaccine, wash your hands frequently, self-isolate if you are sick, practice physical distancing and wear a cloth face covering

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## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:15 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD

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**From:** Colleen Otash <co1@roadrunner.com>  
**Sent:** Wednesday, May 26, 2021 5:27 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** BCHD

The project has many good benefits to the community however I think it should be no higher than four stories of housing units and would suggest either extending it longer on the east side or making it wider. I know that would temporarily eliminate the Center for Health&Fitness, but maybe that building could be built first before the housing units.

CO-1 We are looking at a long term project and I think the change would help to appease the community and to provide a better visual impact.

There was a suggestion of putting a garden and plants on top of the housing building or providing a garden for the residents somewhere on the property. I think that would be in alignment with the BCHD's health emphasis.

Respectfully,

Colleen

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 11:31 AM  
**To:** Meisinger, Nick  
**Subject:** Fw: Healthy Living Campus Draft EIR Now Available

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---

**From:** Conna C <gandolfcnc@hotmail.com>  
**Sent:** Wednesday, March 10, 2021 9:08 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Re: Healthy Living Campus Draft EIR Now Available

CC-1 Thank you for providing the environmental impact report. Having been born and raised in Redondo Beach I have a longtimer's memory of plans like this. The plans of promises for the seniors ousted from their homes to create The Villages ... once built totally outside the budget of those displaced from their homes. The trickster bogus waivers for the condos along Esplanade.

Your report does not properly represent how this project will change the area negatively. It totally under-estimates the traffic.

CC-2 I am strongly opposed.

Dr. Conna Condon

---

**From:** Beach Cities Health District <communications@bchd.org>  
**Sent:** Wednesday, March 10, 2021 3:09 PM  
**To:** gandolfcnc@hotmail.com <gandolfcnc@hotmail.com>  
**Subject:** Healthy Living Campus Draft EIR Now Available



March 10, 2021

The Draft Environmental Impact Report (EIR) for the proposed Healthy Living Campus on Beach Cities Health District's property at 514 N. Prospect Ave. is now available. BCHD has extended the requisite 45-day public review and comment period to 90 days, extending from March 10 through June 10.

Official public comments about the technical sufficiency of the Draft EIR impact analysis, mitigation measures, and alternatives will be accepted until June 10, 2021 at 5 p.m.

[View the Draft Environmental Impact Report](#)

## How to Comment on the Draft Environmental Impact Report

### 90-Day Public Review and Comment Period: March 10 - June 10, 2021

There are a variety of ways to submit written or oral public comments.

**Website:** [bchdcampus.org/eir](http://bchdcampus.org/eir)

**Email:** [EIR@bchd.org](mailto:EIR@bchd.org)

**Mail:** Nick Meisinger re: Healthy Living Campus  
Wood Environment & Infrastructure Solutions, Inc.  
9177 Sky Park Ct.  
San Diego, CA 92123

### Provide oral comments during one of these public opportunities:

Wed., March 24, 6:30 p.m.

Tues., April 13, 6:30 – 8 p.m.

Sat., April 17, Noon – 1:30 p.m.

Public comments at the March 24 meeting will begin following the Draft EIR presentation by Wood Environment at the regularly scheduled BCHD Board of Directors meeting.

**For more information on how to submit a comment or join a meeting, visit [bchdcampus.org/eir](http://bchdcampus.org/eir)**



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## Draft Environmental Impact Report Videos

The following videos provide a brief overview on a variety of topics in the Draft Environmental Impact Report by Nick Meisinger, NEPA/CEQA Project Manager from Wood Environment & Infrastructures Inc.



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**Healthy Living Campus  
Project Plan**



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**Aesthetic & Visual  
Resources Section 3.1**



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**Construction Emissions Air  
Quality Section 3.2**



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**Noise Section 3.11**



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## About the Environmental Impact Report

In 1970, the California Environmental Quality Act (CEQA) became state law. CEQA requires state and local agencies within California to analyze proposed construction projects and provide an Environmental Impact Report (EIR) detailing potential environmental impacts and outlining measures to avoid or mitigate those impacts, if feasible.

### What is the purpose on an EIR?

An EIR is for project decision-makers and the public to understand environmental impacts of a proposed project and review plans to mitigate those impacts. [Learn More.](#)



[bchdcampus.org](http://bchdcampus.org)



Beach Cities Health District | 514 N. Prospect Ave., 1st Floor, Redondo Beach, CA 90277

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## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:17 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: \$1.8M contract to CAIN Brothers up for approval - Tonight - 4/28 BCHD Board Meeting

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---

**From:** Catherine Bem <Catherine.Bem@bchd.org>  
**Sent:** Wednesday, April 28, 2021 4:13 PM  
**To:** Dan Smith <Dan.Smith@bchd.org>; Cristan Higa <Cristan.Higa@bchd.org>; Charlie Velasquez <Charlie.Velasquez@bchd.org>; EIR <eir@bchd.org>  
**Subject:** FW: \$1.8M contract to CAIN Brothers up for approval - Tonight - 4/28 BCHD Board Meeting

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**From:** Dan Rogers <dan90503@gmail.com>  
**Sent:** Wednesday, April 28, 2021 3:39 PM  
**To:** Communications <Communications@bchd.org>  
**Subject:** \$1.8M contract to CAIN Brothers up for approval - Tonight - 4/28 BCHD Board Meeting

DR-1 | I live near Beryl and Redbeam. A project like this would severely impact the traffic and congestion in our community. We have been residents of Torrance for more than 10 years. We are completely against this project and we would like the board to know that.



## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:39 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Healthy Living Campus Project- Opposition

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**From:** Dana Grollman <dana.grollman@yahoo.com>  
**Sent:** Tuesday, June 8, 2021 1:00 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Healthy Living Campus Project- Opposition

Hello,

My name is Dana Grollman and my family has lived in Redondo Beach for over 19 years on Ripley and Cluster. I've been reading and trying to understand the scope of the HLC project and am opposed to the:

- DG-1 - Scope and height of the buildings. They will dramatically change the views for residents in the area and affect their resale value. This includes the Senior Care facility.
- DG-2 - I'm very concerned about the Phase 2 parking structure and how it will fit in, look and the traffic it will create.
- DG-3 - The corner of Flagler and Beryl is very congested as it stands now, especially when schools are in session. The addition of trucks and increased construction traffic to this corner for years will greatly negatively impact all residents who are getting their kids to school.
- DG-4 - The noise level and pollution will be high for this project. We just saw the end to the third round of "Fixes" to 190th street and Dominguez Park by So Cal Gas. I cannot tell you the frustration it brought me. The sounds carried far on a daily basis which I believe lasts years if you total up the number of days they worked on this. I can hear it perfectly from my home on Ripley. It seemed to be never ending.
- DG-5 - Soil contamination
- DG-6 - I don't believe the BCHD which is a public company that exists from taxpayer dollars should be working with or "gifting" a lease to an assisted living project. They will be using our funds to help establish an assisted living home that their study said 80% of potential residents would not be from the Beach Cities. This seems to be out of the scope.
- DG-7 I oppose this project.

Dana Grollman

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:51 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Comments to the BCHD draft EIR  
**Attachments:** Dean Francois Comments.pdf

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---

**From:** Dean Francois <deanfrancois@gmail.com>  
**Sent:** Thursday, June 10, 2021 10:16 AM  
**To:** EIR <eir@bchd.org>  
**Subject:** Public Comments to the BCHD draft EIR

### Dean Francois - Comments for the Draft EIR

#### BCHD Healthy Living Campus and Senior Luxury Housing Complex

I am the political director of the Palos Verdes South Bay Executive Management Committee of the Sierra Club. I worked on the comments that the Sierra Club provided and approved by our Management Committee. I am a former Redondo Beach Public Works and Preservation Commissioner, former President of the Redondo Beach Historical Society and a current member of the Hermosa Beach Historical Society.

DF-1

This project has serious environmental problems if it ever will be built in this community. These concerns have been provided by Redondo and Torrance City Councils and the Sierra Club faulting Air Quality, Energy, Biological, and Greenhouse sections. It makes more sense to retrofit existing buildings to create better revenue for the BCHD. The DEIR failed to adequately consider these alternatives. My comments show that the proposed project will bring in far less income than retrofitting the buildings and therefore a retrofit will best meet the objectives of the BCHD.

Typically, public EIR input is directed to a public agency. BCHD is a Public Agency, and it is the Lead Agency and Certifier/Approver of its own EIR. They cite "overriding considerations" to unmitigatable hazards, which are already included in a budgeted line item in BCHD EIR financials. This is a highly unusual relationship for a creditable avenue for public input.

The district has strayed far beyond its mission. The project is a "gift" of public land with environmental consequences in a very long-term lease (likely ~50 to 100-years) to private developers.

I am expanding comments to cover in more detail certain flaws that I see in this DEIR.

#### 2.4.3 Project objectives

DF-2

The main purpose of the campus is to generate revenue so that the BCHD can fund community health programs. The objectives of the project go further, embracing building a "center of excellence and redeveloping the project into a modern campus". This project may conflict with the overall BCHD objective of generating sufficient "revenue through mission derived services to address community health needs". The reason the project may conflict with that is because the district could be so leveraged to the investors (a 20-80 split) they

DF-2 (cont.) may not realize sufficient revenue (only 20%) when the project is completed. Furthermore by including into the project objective building a center and creating a modern campus, the DEIR is not able to easily select other alternatives that may generate more revenue without building a campus. DEIR objectives are too restrictive that it rules out better alternatives that meet the objectives of the district.

#### **4.2 reasons the project is being proposed notwithstanding its significant and unavoidable impacts**

DF-3 DEIR is faulty in that it states that the proposed project would address escalating building maintenance costs which would exceed revenue within the next three years. But they have provided no financial information regarding this determination. With a remodel of the building these maintenance costs would be eliminated. DEIR is faulty and that it eliminated that alternative without justification.

### **5.0 ALTERNATIVES**

#### **5.2 PROJECT OBJECTIVES**

DF-4 As stated above, the main purpose of the campus is to generate revenue so that the BCHD can fund community health programs. The objectives of the project go further embracing “building a center of excellence” and redeveloping the project into a “modern campus”. This project may conflict with the overall BCHD objective of generating sufficient revenue through mission derived services to address community health needs. The reason the project may conflict with that is because the district could be so leveraged to the investors they may not realize sufficient revenue when the project is completed. (80-20 split). Furthermore, by adding into the project objective building a center and creating a modern campus, the DEIR is not able to select other alternatives that may generate more revenue without building a campus. DEIR objectives are too restrictive that it rules out better alternatives that meet the objectives of the district.

#### **5.4 ALTERNATIVES CONSIDERED BUT REJECTED FROM FURTHER ANALYSIS**

The DEIR rejected for further review the alternative “Upgrade the Beach Cities Health Center (No Seismic Retrofit).

This is a major fault of this DEIR. This could be considered the most environmentally sensitive alternative and could be selected as the best course of action. It was simply rejected because it states it does not meet the project objectives, but this is faulty logic. As stated above, the objectives were worded so that it would automatically reject this alternative. And the alternative including seismic retrofit was not considered.

DF-5 BCHD has relied on the existing campus to provide income to meet all of the objectives and needs of the BCHD. Existing campus brings in the revenue it needs. There is no explanation as to how suddenly it does not, how much revenue would be increased by the project, and what investment could be done to the existing campus to generate more income to meet its needs.

Currently BCHD receives \$10M in rent. A remodel or a complete retrofit would cost well under \$50M. The rent would certainly be more like \$20M after the remodel. This would pay back the investment in 3 years and create the best income and return on investment for the district to provide its health services and its objectives.

The complete proposed project would cost over \$500M. It is unreasonable to expect that rental income could ever come close to what is needed in order to meet the district objectives. This is lacking in the analysis. In fact, BCHD plans a 20/80 business partnership where they retain only 20% interest. This implies that the

DF-5 (cont.) investors would have control over its uses and control leaving the elected Board and the taxpayers with little or no environmental control. And could imply that BCHD would only gain 20% on any income. This would not meet the project objectives.

5.5 ALTERNATIVES ANALYSIS

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

DEIR is required to analyze a No Project Alternative or “Do Nothing” alternative.

DF-6 A Do Nothing alternative would mean leaving all the existing buildings and grounds in place, just as they are. Instead, the DEIR incorrectly labeled the “Do Nothing” alternative as an alternative that included demolishing the existing buildings.

DEIR incorrectly justified that the demo would have to occur since the buildings would deteriorate. DEIR failed to provide any evidence that this would have to occur and made too many assumptions. DEIR failed to consider a remodel and/or retrofit. This conveniently was done so that the No project alternative which is required to be analyzed would be rejected.

The DEIR must analyze a “Do Nothing” alternative which includes keeping the buildings intact.

Summary:

DF-7 A complete analysis should be done for 2 alternatives: 1) remodel and 2) remodel to include retrofit. Either of these would be environmentally friendly alternatives. And, the required No Project Alternative analysis needs to be revised so that it is not a demolition, but a remodel of the buildings.

What I have shown with the financial implications is that the BCHD will best meet its objectives to create revenue streams for its programs by remodel and retrofit its existing buildings. The DEIR must analyze these alternatives and choose the best one for the district and the taxpayers.

--  
*Dean Francois*  
*1-310-938-2191*

<https://www.dean4council.com/>

FB page:  
<https://www.facebook.com/Dean-For-Council-110844084377707/>

**Public Comments to BCHD DEIR, BCHD Board, City of Redondo Beach Council Body, City Clerks of Redondo Beach and Torrance, Redondo Beach Community Development Director**

[communications@bchd.org](mailto:communications@bchd.org), [EIR@bchd.org](mailto:EIR@bchd.org),  
[eleanor.manzano@redondo.org](mailto:eleanor.manzano@redondo.org), [cityclerk@torranceca.gov](mailto:cityclerk@torranceca.gov),  
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[zo@obagi4redondo.com](mailto:zo@obagi4redondo.com), [laura.emdee@redondo.org](mailto:laura.emdee@redondo.org),  
[brandy.forbes@redondo.org](mailto:brandy.forbes@redondo.org)

DV-1

The DEIR should disclose any conflict of interest that individuals may have between BCHD and the Wood Company. This should also apply between BCHD and those contracted to produce this document including: Wood Environmental & Infrastructure Solutions, Inc., iLanco Environmental, LLC (Air Quality and greenhouse Gas [GHG] Emissions), Fehr & Peers (Transportation), and VIZf/x (Aesthetics and Architectural Services). This would disqualify their use in the DEIR and deem it null and void.

DV-2

We the undersigned, [the authors of this document] also support all other public comments **opposed** to this BCHD DEIR that have been received in the Cities of Torrance, Redondo Beach, the BCHD, RBUSD, TUSD and any other Responsible Agencies that are in file in opposition to the BCHD DEIR.

The public comments, below are in response to the BCHD DEIR, and we are requesting that they become part of the public records of the Cities or entities that have received them.

## REDONDO BEACH CITY RESIDENT COMMENTS

DV-3 The DEIR states that the Beach Cities Health Center “have seismic-related structural deficiencies” due to the year it was built. The Beach Cities Advanced Imaging building “to a lesser extent”. The DEIR also states that these buildings require annual maintenance and in the near future the costs according to the DEIR will exceed “the annual operations revenues. If prolonged this operational deficit would lead to a reduction in BCHD programs and ultimately lead to insolvency.”

What the DEIR **ignored** that the existing buildings can be retrofitted, as per Nabih Youssef Associates report, besides that the campus maintenance is a strong bias in favor of 100% demolition and the construction of a new project that will alter the quality of life, because of the scale of overdevelopment density and building mass that does not belong of the site [land] or in the surrounding community.

DV-4 The justification for the BCHD proposed project is to avoid bankruptcy or become insolvent that will force them to eliminate or reduce programs that help the tax payers. BCHD, for years, has been duplicating programs that already exist in the nearby hospitals or communities. **The new proposed project [and its financing], will for sure, will send BCHD in bankruptcy. (The ROI [Return on Investment] cannot be justified long term.)**

Health Cities Districts have been eliminated in many communities [around the State]. The ones that remain are basically hospitals: which **is not the case** for BCHD.

The DEIR has clearly described the 2 Phases proposed for this development and exposed the intention of those responsible for the idea: To **BUILD a Residential Care Facility for the Elderly** [RCFE], and **hide it under** that [slogan] of a **Healthy Living Campus**.

DV-5 **Phase 1:** The amount of square footage dedicated to **RCFE** [is] 203,700 sf and [plus] 14,000 sf for **PACE** with a total of **217,000** sf versus 6,270 sf for **Community Services** and 9,100 **Youth Wellness Center** with a total of **15,370** sf. This disproportion in the amount of sf of the buildings sizes is sending a very clear message that the new development has only one goal to build a **RCFE** that is not part of the mission for which BCHD was created. In addition, the zoning designation, does not allow for **RCFE** either.

PACE should **not be included**, as part of the proposed project, because the beaches cities are **already served** by the **LA Coast PACE** as its name emphasizes. Consequently is a redundant or **duplication of services** [Confirmed by phone 800-734-8041 June 7, 2021]

DV-6 **Phase 2:** This would provide a Wellness Pavilion of up to **37,150** sf, an Aquatic Center of up to **31,300** sf, and up to **20,000** sf of space for the Center for Health and Fitness (CHF) relocated back to the campus with a total build of **88,450** sf. Parking is provided in a parking structure that the sf will not be related with the healthy campus.

The Phase 2 per the DEIR is a, a-**"long range development program"** and is **"less defined"** than Phase 1.



DV-6  
Cont.

That statement is a clear indication that the **Phase 2** that really **responds** to **BCHD's mission and a Healthy Living Campus**, and must be the **first** [part of phase] of any **development proposed, but instead** the **program is "less defined" and it is not clear when, or it will ever be built. [Funding could run out or proposed revenues fall short forcing abandonment. No funding guaranteed is mentioned in the DEIR.]**

DV-7

The BCHD campus is located in **Redondo Beach** and is zoned **Public Community Facility (P-CF)** under the Redondo Beach General Plan and the Redondo Beach Zoning Ordinance. Permitted land use designation is clearly stated: A land that has that use designation has permitted: parks and recreation and public open space, governmental administrative and maintenance facilities, police, fire, cultural (e.g., libraries, museums performing and visual arts, etc.), educational as schools, human health, human services, public utility easements, and other public uses. It is **does not** included **RCFE**.

DV-8

The vacant **Flagler lot**, which was **bought** by the BCHD, is zoned **Commercial (C-2)** under both the Redondo Beach General Plan and Zoning Ordinance. Part of this lot is located in the City of Torrance under their jurisdiction, regulations and their General Plan and Zoning Code.

**The vacant Flagler Lot deserves separated comments** because the petroleum pumps on it were working for years around the clock 24/7.

The **Flagler** Lot was **acquired** by the BCHD, with **tax payer** money (about 27% of its cost), when the oil wells were deserted.

It has **not been proved or provided to** the public that BCHD **prior** to the purchase of that lot knew about the condition of the soil. [I have requested that information from them since 2017 without success].

This information must be documented by the **seller**, and in the hands of BCHD proving that the orphaned wells in the site have been **properly plugged** and **cleaned up, prior** the purchase of that lot. If not, and the oil wells are a **threat** to the **residents [health, safety, and welfare] who** live nearby a liability be in the hands of BCHD.

**BCHD** has **never informed** to the **public**, which entity [**buyer or seller**] will take the **responsibility** if something is **wrong** with the existing **oil wells**. It will be a very **costly legacy** in addition **more tax payer money** which will be needed to resolve the matter. **BCHD** one more time **is not representing here the reason for what it was created**.

See the pertinent information from the ESA section of the DEIR page 3.8-6, 3.8-13, 3.8-14.

The BCHD purchased the property after the oil well(s) were shut down. Where are these reports and the communications with CALGEM (CaGeologic Energy Management Division) showing the abandoned well(s) are safe and the property usable? The DEIR states that a summary was prepared and sent to CALGEM. As today, there is NO RECORD of this in CALGEM records (per geologist, [Andrew.Lush@conservation.ca.gov](mailto:Andrew.Lush@conservation.ca.gov) as of 06/07/2021) the issue is mentioned extensively in 3.8-26-24 and is identified in the DEIR as MM HAZ-3.

DV-8  
Cont.

As stated above, the City of Torrance has jurisdiction in 25% of the property and their zoning regulations (S.3.4, S.3.5, S.4) do not include and abandoned well(s). How do the residents of Redondo Beach know if this property is SAFE to use? The DEIR does not show this. This opens the BCHD and the City of Redondo Beach to lawsuits if the parcel is utilized and the capped well(s) leaks or worse.

DV-9

Other **Hazards** to mention in the vicinity is the now closed Dry Cleaners in the shopping plaza directly north of the project which outgassed PCE (tetrachloroethylene). This is left to phase 2 developments and not fully addressed. The DEIR nebulously states two Federal studies that say most problematic for PCES is inside. Yet, a single google search states: can occur “**from** occupational or environmental contamination or use of consumer products that use PCE. The most prevalent route of exposure is by inhalation and is readily absorbed through the lungs.” (turi.org). It can be very harmful to your lungs, skin and health. Who will protect the public from this chemical which is known to penetrate the body easily via air, water, and soil contamination? The DEIR never directly addressed the issue.

## **BCHD Mission**

DV-10

BCHD has an existing range of health programs, community services and various partnership programs including group meetings and a diversity of health classes. Those services are **similar** to ones that are provided by the **Torrance Memorial, Providence** Hospitals and **LA Coast PACE**. For example: the Center for Health and Fitness [CHF] provides programs and services similar to many other places all over the beach cities health district and beyond.

BCHD's website under "**About us/ Mission**" presents and promotes: "To enhance community health through partnerships, programs and services for people who live and work in Hermosa, Manhattan and Redondo Beach."

"Vision: A healthy beach community. Health Priorities 2019-2022: Nutrition and exercise. Social-Emotional Health: Substance Use, cognitive health."

As its website is indicating **BCHD** is **only** about **wellness**, which is the only **reason** that it **exists**. BCHD must focus only on that big task, the wellbeing of the residents of the South Bay, not to **incursion** into the **adventures** a **real estate developer**. It was never the purpose for which it was created and its **tax payer money in its** budget is intended for.

DV-10  
Cont.

The **RCFE** does **not belong** on the BCHD site not only because the **Zoning** does not permit it, but also because the BCHD **Mission**. These types of **facilities** are found **adjacent** to **hospitals**: e.g. Torrance Memorial, Providence, and Cedar Sinai to name. Those hospitals are actually surrounded by many types of supporting facilities and are continuing to see more being built. The patients have immediate attention when needed and the ambulances are not crossing all over the cities continuously. Ambulance noise will not impact the residential communities and elementary schools nearby. In summation, **the DEIR doesn't** address the long standing issues and complaints of ambulance noise attributed to this site by the local residents. Hence, the Zoning smartly prohibits those uses now sought by the developers.

DEIR Table 3.11-2. indicates the Emergency Medical Services [EMS] calls for the existing Campus, where Silverado is located, as a tenant; inaccurately states a reduction in the numbers of trips by the Redondo Beach first responders during the period of 2015 to July 2019.

The **RCFE** proposed project is really the only reason for this **fake Healthy Living Campus**; deceiving the naïve and innocent. What follows is only educative or anecdotal because there should be **no time wasted in evaluating a proposed project that doesn't belong on that site, when the environmental impacts scream overdevelopment and the zoning even says it is not allowed.**

DV-10  
Cont.

How many more burdens does the City of Redondo Beach and Torrance have to identify to clearly **show it's** incompatible with the surrounding community?

For example, one negative economic impact to the City of Redondo Beach is the current location where the BCHD is seated.

BCHD Healthy Living Campus has introduced to the Science a totally new and revolutionary concept that has left the entire scientific world stupefied: **The concentration of 200 residents into a small area will make them the receipts of improvements to their health and the health of the adjacent communities?** It is an offense to the intelligence of our community and its residents.

More offensive is the aggravation that the **design** of the **RCFE** proposed **building** is **obsolete before the DEIR was written**. The impact of the pandemic has affected the future of the design of these types of facilities with new trends, innovations, codes, and standards of care.

Flexibility, decentralized spaces that are smaller in size, multiple small house models, instead that poly centralized spaces together, which is the notion to living small is gaining popularity working for both assisted living and independent living. This model is family approach, people lives in smaller group of settings of 7 maximum 12 and the care is tailored around their natural rhythm.

DV-11

**New approaches** are already, being implemented, with a **great success** utilizing **outdoor environment**, decentralized spaces with **smaller sizes and capacities**, including more amenities meeting pandemic protocols, small group of settings, and **greater emphasis on outdoor rooms** that are an extension of interior amenities. This proves that, the changes to residential care facilities have advanced successfully in a direction that is **contrary to the proposed design which lacks the adequate direct outdoor** connection, the solace to survive emotionally, and so one not found in the concentration and proposed design of this project. **This alone is another reason to stop the project.**

\*\*\*\*\*

See the list of the undersigned on next page 10 of 10

We the residents agree with the above comments:

Delia A. Vechi-Redondo Beach

Melanie Cohen-Redondo Beach

Mary Ruth Ewell-Redondo Beach

Barbara Epstein-Redondo Beach

Jo Hrzina-Redondo Beach

Sheila Lamb-Redondo Beach

Marie Scott-Redondo Beach

Nancy Clarke-Redondo Beach

Rich Crisa-Redondo Beach

Bonnie Price-Torrance

Reggie Wong-South Bay Resident

Al Wong-Torrance

Joan Davidson-Palos Verdes



## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:57 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD's massive project

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** diane hayashi <diane\_hayashi@yahoo.com>  
**Sent:** Thursday, June 10, 2021 4:35 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Fw: BCHD's massive project

To Nick Meisinger

As a lifetime resident of Torrance, I enjoy my panoramic views of the PV Peninsula everyday. It's a huge part of Redondo Beach's attraction. When I heard about the BCHD's massive project, I could not believe it.

### Aesthetics and Visual Resources

RCFE is clearly Incompatible with surrounding neighborhoods. Its placement on the extreme perimeter of the property, combined with the proposed scale and mass causes the most damage to surrounding neighborhoods.

Violates General Plan land use policies for cities of Torrance and Redondo Beach municipal code to be "compatible in scale, mass, and character with surrounding neighborhoods".

Single family homes surround the site as close as 80 ft. from proposed structures to the East, West, and South with up to a 30 ft. height limit. To the North by Residential RMD and Light Commercial C-2, both with 30-foot height limits. RCFE is built out to the edge of the property on a 30 ft. bluff, with properties to the East situated another 60 ft. below grade. It will:

- Cause significant damage to blue sky views and major privacy issues.
- Subject residents to significant glare and night-time lighting of the 24/7 operations facility. DEIR provides no substantive analysis of impact.
- Create shadow effects that are significant to Torrance homes to East, Towers Elementary school and Redondo Beach homes to the North.

It would ruin not only the surrounding neighborhoods but all of the South Bay permanently.

Please address the following policy violations in the General Plan for both cities below.

Torrance General Plan Policy LU.2.1. “Require that new development be visually and functionally compatible with existing residential neighborhoods...”

DH1-2  
(cont.) Torrance General Plan Policy LU.3.1. “Require new development to be consistent in scale, mass and character with structures in the surrounding area”

Redondo Beach General Plan Policy 1.46.4. “... 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.”

Thank you,  
Diane Hayashi  
310.819.5330

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:58 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Reject Project

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

---

**From:** diane hayashi <diane\_hayashi@yahoo.com>  
**Sent:** Thursday, June 10, 2021 4:42 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Reject Project

- To Nick Meisinger

## Noise

The DEIR section on noise states in part:

“Prolonged exposure to high levels of noise is known to have several adverse effects on people, including hearing loss, communication interference, sleep interference, physiological responses, and annoyance (Federal Interagency Committee on Urban Noise [FICUN] 1980).” [Ref: DEIR Sec. 3.1 Noise]

The impacts will be greatest throughout the areas surrounding the 11-acre site. “...significant and unavoidable noise impacts would occur through implementation of proposed construction.” [Ref: DEIR p.3.11-35]

The hazards of noise to all residents/sensitive receptors including the public at large include:

- Surrounding residents to the South, North, West and East of the site,
- Tenants of Silverado who are on-site throughout the entire construction period
- Towers Elementary School with 600+ 4-10 year old students, staff, and visitors
- Adjacent businesses, workers and the public
- Medical offices onsite employing health care workers, doctors and others, serving the public

The operational noise levels for anticipated events on-site is not sufficiently discussed or analyzed.

DH2-1  
(cont.)

The study of noise is deficient, the data was based on modeling averages and not intermittent noise. The effects of the noise disruptions as well as ground vibrations caused by truck traffic and construction on student performance in classrooms was never studied.

Viable mitigations to noise were not considered in the DEIR, such as for structure to be significantly set back to the center of site as well as reduce the height structure to no more than 30 ft., the maximum height of potentially viable noise barriers.

- Thanks so much,
- Diane Hayashi

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:56 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Ed Arnn Comments on BCHD Draft EIR  
**Attachments:** Ed Arnn Comments on BCHD Draft EIR.docx

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

---

**From:** Ed Arnn <edarnn@earthlink.net>  
**Sent:** Thursday, June 10, 2021 3:41 PM  
**To:** EIR <eir@bchd.org>  
**Cc:** tozenne@gmail.com <tozenne@gmail.com>; CityClerk@torranceca.gov <CityClerk@torranceca.gov>; Eleanor.Manzano@redondo.org <Eleanor.Manzano@redondo.org>; Bruce Steele <litespeedmtb1@verizon.net>  
**Subject:** Ed Arnn Comments on BCHD Draft EIR

To Whom it may Concern,

Please find my comments on the 2021 BCHD Draft Environmental Impact Report.

Edward Arnn

## Comments on BCHD's Draft EIR

Ed Arnn  
Torrance

EA-1

I made a late start reading the Environmental Impact Report, being daunted by the 972-page pdf file **BCHD\_DEIR\_For Print**. My hope that the Readers Guide would be an easier introduction were frustrated by an opaque, graphics-free jumble of text. When I went back to the DEIR I was pleasantly surprised to see that it included graphics that helped find context and paragraph titles that aid a quick scan of the document to find sections of special interest. However, I found that, in many ways, the DEIR was as opaque and convoluted as the Readers Guide. There are many inconsistencies between the text, summary tables and graphics, leaving the reader unsure of the proposed project.

My comment on several areas of great interest to me follow. I am a resident of Torrance who has lived here for 40 years living about 740 feet east of the BCHD eastern property line. My sympathy goes out to members of our community living on Tomlee who are much closer to the proposed RCFE residential building.

### Some Key inputs from 2019 Notice of Project

The DEIR cites a list of community inputs from a series of NOP meetings held in 2019. Some were properly addressed but others seem to have been ignored completely, in particular Aesthetics and Visual Resources. Here are some issues of interest listed on pages 1-14 thru 1-16 (pdf 114-116).

EA-2

- Potential construction-related air quality and noise impacts to on-site and adjacent sensitive receptors, including but not limit to: on-site residents of the Silverado Beach Cities Memory Care Community; off-site residents along North Prospect Avenue, Beryl Street, and Flagler Lane; nearby parks (e.g., Dominguez Park); and schools (e.g., Towers Elementary School) (see Sections 3.2, *Air Quality*, and Section 3.11, *Noise*).
- Potential impacts related to fugitive dust emissions and human health risk during construction activities, particularly within the adjacent residential neighborhoods (see Section 3.2, *Air Quality*).
- Potential construction-related impacts on pedestrian and bicycle safety, especially as it relates to truck traffic within the vicinity of nearby residential neighborhoods, parks, and schools (see Section 3.14, *Transportation*).
- Building height compatibility (e.g., bulk, mass, and scale) and potential impacts to the existing public views and shade/shadows, particularly within the adjacent residential neighborhoods (see Section 3.1, *Aesthetics and Visual Resources*).

The inclusion of a preliminary Construction Management Plan in the 2021 DEIR cleared a lot of concerns arising from uncertainties, and allows more focused and constructive feedback. Likewise, inclusion of an Air Quality Management Plan starting on page 3.2-10 (pdf page 312) goes a long way in demonstrating serious mitigations are planned. On the other hand, the planned Outbound Haul Route on Beryl Street

EA-2 (cont.) takes thousands of trucks past the entrance to Towers Elementary School and may represent a hazard that requires mitigating actions, which I did not see in the DEIR.

EA-3 In contrast, the response to criticism of the aesthetic impact of the out-sized RCCE building atop the 30-foot hill on Flagler Lane seems to have been completely ignored, if not maliciously aggravated in the revised BCHD plan. This will get much discussion below.

## Aesthetics and Visual Resources

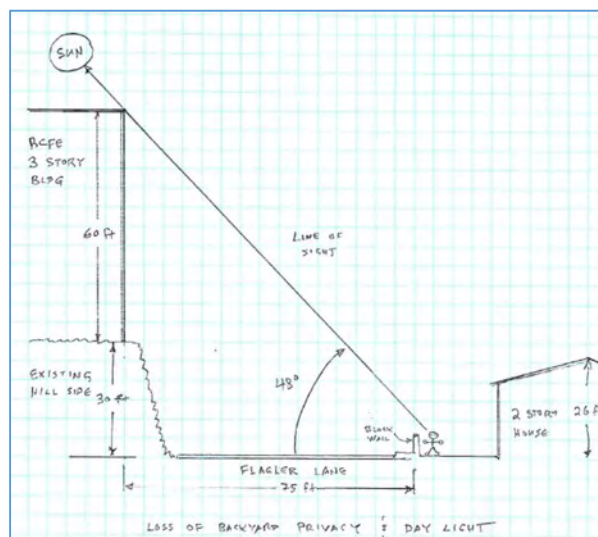
I made comments and provided analysis of the drastic changes to the visual environment for the residents living along Tomlee in the northern corner of our low-density housing development. This was documented in a Word Document ***BCHD EIR Scoping Comments\_ELA*** submitted to Mr. Nick Meisinger, NEPA/CEQA Project Manager in 2019. I note that the Torrance City Council in their May 25, 2021 review of the DEIR also cite the severe aesthetic impact of the proposed looming RCCE building. They recommend setting the RCCE back from the eastern edge of the BCHD land and stepping each floor back further to provide a compatible visual environment. While administration, taxation and funding stop at political boundaries, the physical impacts to the environment continue across any such artificial constructs. In particular, being 30 or more feet lower than the Project Site and down wind (sea breeze) places most of the environmental impact in the adjacent Torrance neighborhood.

As I pointed out in my 2019 comments:

“If I were one of the residents living just across Flagler on Tomlee Avenue, I believe I would feel the privacy of my back yard had been violated, much of my daylight had been taken away, my wonderful sea breeze blocked and the beauty of my site destroyed by the huge building towering over the houses. Much of the email I have read supports this view. There is clearly serious environmental impact assessment work to be done.”

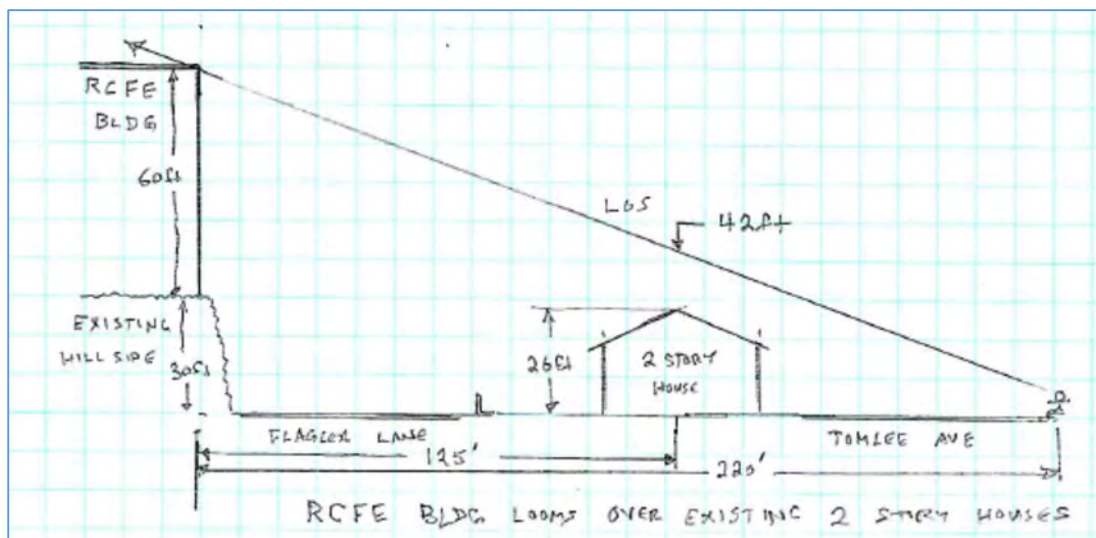
EA-4

I suggested in my letter of transmittal that it was time to stop and walk around the BCHD project grounds and try to grasp the likely impact to residents on all sides of the land. The hope was that a better balance of interests between the BCHD and their neighboring residents could be found. I included some sketches to show my analysis of the visual impact of the 60 foot tall RCCE building proposed in 2019.



Loss of Privacy and View of Sky for Tomlee Residents





**RCFE Towering over Roof Lines as Seen from Tomlee Sidewalk**

These hand analyses of the visual impact of the then-proposed 60-foot (four story) RCFE were offered as a first step toward making the impact clear to those who would be affected. It was hoped that a more acceptable plan would be forthcoming and that the EIR team would use their superior, computer-aided, tools to provide rendered views to the community for comment.

EA-4  
(cont.)

The new 2021 proposed BCHD Project Plan dismissed this input and instead increased the height of the RCFE to 103 feet and did not set the building back from the edge of the hill side overlooking Flagler Lane. A minor effort was put into analysis of Alternative 6- Reduced Height Alternative which kicked this approach off the table as possibly not being financially feasible.

#### **5.5.6 Alternative 6 – Reduced Height Alternative**

As described in Section 3.1, *Aesthetics and Visual Resources*, the proposed Project would result in potentially significant impacts related to interruption of views of the ridgeline of the Palos Verdes hills from the highpoint at 190<sup>th</sup> Street & Flagler Street (i.e., Representative View 6). MM VIS-1 would require a reduction in the height of the RCFE Building such that it would no longer interrupt the ridgeline of the Palos Verdes hills. Therefore, impacts to this scenic vista would be *less than significant with mitigation*. However, the financial feasibility of implementing MM VIS-1 is not certain at this time. A reduction in floor height would remove programmable revenue-generating space in the RCFE Building. Additionally, excavation to recess the building further below the ground surface would be costly.

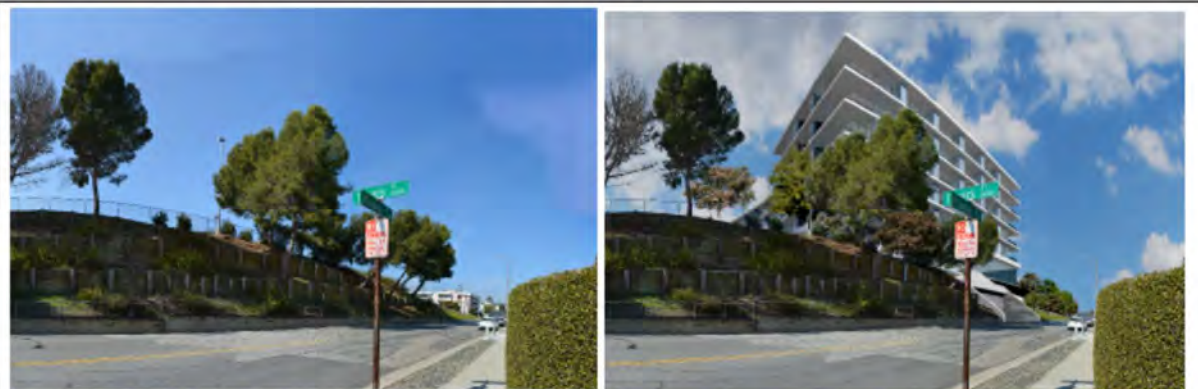
Note that the cited Aesthetic impact is for an interruption of the sightline to the Palos Verde hills as seen from the highpoint at 190<sup>th</sup> Street and Flagler Lane (some 1,500 feet distant from the RCFE) while it is silent about the effect on the Tomlee residents and public passersby only 80 to 250 distant.

The total dismissal of the significance of the Aesthetic and Visual Resources impacts of the size and siting of the RCFE is justified by the CEQA case law found on page 3.1-29 (pdf page 227):

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

### 3.1 AESTHETICS AND VISUAL RESOURCES

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



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

#### The Elephant in the Living Room

This amazing graphic is found on page 3.1-43 (pdf page 241). The EIR team has done what was requested and provided an image to help understand the visual impact of the new 2021 BCHD Project Plan. The change to the Aesthetics and visual resources could hardly be considered “less than significant.” This is the monstrosity that the low-density housing residents in Torrance adjacent to Flagler Land would have to accept.

The EIR team likewise provided a graphic illustrating the dramatic change in the view from the multi-family residences located on Beryl Street opposite the Vons shopping center in Redondo Beach. It is an equally breath-taking alteration of the visual environment. Currently the view to the south is mainly a tree lined hillside with a few parked cars showing through. After the proposed RCFE is built, the view will



be a towering structure which fills up to 90 degrees of the residents' field of view, again hardly "less than significant."

### 3.1 AESTHETICS AND VISUAL RESOURCES

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



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



**View from multi-family Residences on Beryl Street in Redondo Beach**

In the face of the above visualizations of the impact of the proposed RCFE building *the Summary of Impacts on Visual Character* on page 3.1-54 (pdf page 252) goes on to say it "would not degrade the visual character of the Project site and vicinity." This may be one of the best examples ever of disingenuous writing.

EA-4  
(cont.)

campus. The proposed RCFE Building would be most visually prominent from Flagler Lane near Towers Street (Representative View 2) and Beryl Street (Representative View 3), and along Beryl Street in front of the Redondo Village Shopping Center (Representative View 4). From Representative Views 2, 3, and 4, the proposed RCFE Building would be substantially taller and would have substantially more massing than buildings in the vicinity, thereby reducing the view of open sky above. However, although the proposed RCFE Building would change the visual character of the Project site and surrounding areas from these locations, the Phase 1 preliminary site development plan would meet the development standards described in the Redondo Beach and Torrance General plans and municipal codes and would not degrade the visual character of the Project site and vicinity. The proposed Project includes many attributes that would improve the

EA-5

It includes a further assertion that is misleading and incorrect which suggests that the RCFE would not be visible from Tomlee Avenue due to intervening structures. The figure on page 3 of these comments shows that even with the lower 60-foot RCFE proposed in 2019, the building would tower above the roof lines when viewed from the east sidewalk on Tomlee. With the new 103-foot height, the LOS would cross the roof line at 93 feet above ground, clearing the roof crest by 67 feet. Not only is the RCFE visible from the public area, it also looms high above this low-density residential area.

The development of the proposed RCFE Building and subsequent demolition of the Beach Cities Health Center would result in a change in the existing views across the site. Views of the Project site would not change substantially from locations where intervening structures would obstruct the RCFE Building, such as along Tomlee Avenue (Representative View 1). Additionally,

EA-6

In summary, the visual character in the vicinity of the Project site is dominated by single-family and

*segments of Berman Street (west of Avila Prospect Avenue), which varies in elevation.*

multi-family residential buildings, scattered with schools, parks, neighborhood-serving commercial uses (e.g., restaurants, grocery stores, etc.), and surface parking lots. Taller buildings near the Project include 4-story multi-family residential buildings between Beryl Street and Agate Street. These structures generally extend up to 52 feet in height. Additionally, street trees along

EA-7

Although the legal requirements of the CEQA may allow the BCHD Project to turn attention away from visual impacts, the local ordinances in Redondo Beach and Torrance include provisions to assure developments are visually and functionally compatible with existing residential neighborhoods.

City of Redondo Beach Local Policies and Regulations (page 3.1-21)

Redondo Beach General Plan Land Use Element



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

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

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

#### City of Torrance Local Plans and Regulations

##### *Torrance General Plan Land Use Element*

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

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

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

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

## **Air Quality**

During the 2019 NOP scoping meetings the issue of control of air pollution, especially dust from the pulverizing of the concrete from the Beach Cities Health Center (hospital building), was highlighted. Since the initial plan in 2019 had little detail of the construction phase, a solid plan with mitigation measures was requested as a part of the EIR. This assessment was to consider the strong and persistent sea breeze the Beryl Heights and West Torrance communities experience. This westerly flow pushes most of the airborne pollutants during construction into Torrance, not Redondo Beach.

The DEIR is very much improved in its discussion of air quality issues and planned mitigations, particularly to control fugitive dust, as the following excerpts show:

As described in Impact AQ-2 below, peak daily criteria pollutant emissions from construction of the proposed Project would not exceed the SCAQMD's mass daily significance thresholds for construction. Unmitigated localized construction emissions from the proposed Project would exceed SCAQMD's LSTs for PM<sub>10</sub> and PM<sub>2.5</sub> (fugitive dust). However, implementation of MM AQ-1 includes watering of exposed soil surfaces three times daily, which would achieve a fugitive dust reduction of 74 percent, and prohibiting demolition when wind speed is greater than 25 mph, which would achieve a fugitive dust reduction of 98 percent. Implementation of MM AQ-1 would reduce on-site construction emissions for PM<sub>10</sub> and PM<sub>2.5</sub> below the SCAQMD's LSTs.

- *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.*

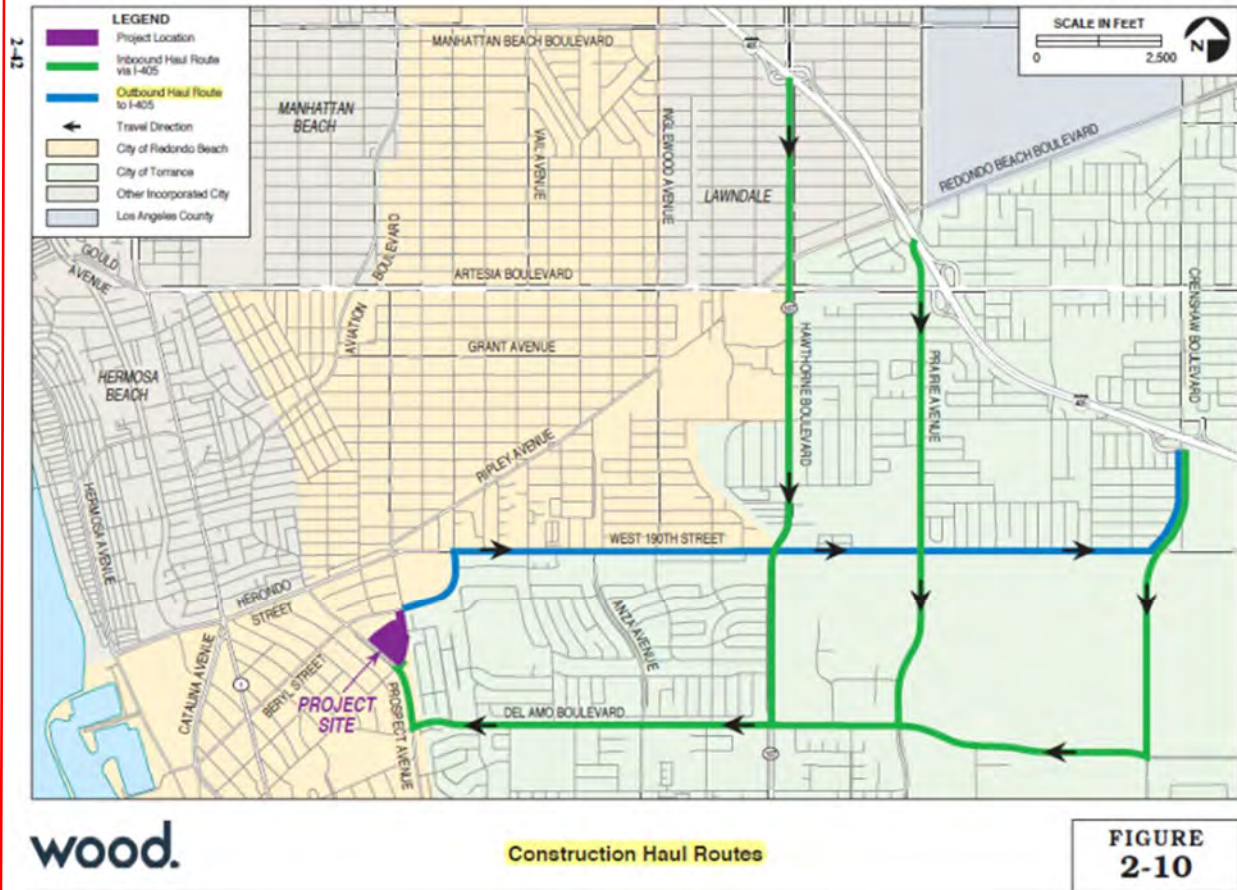
Although the above list of mitigations goes a long way in answering the concern, I believe they may not be enough to prevent large amount of fugitive dust from escaping the concrete pulverization of the obsolete hospital building. Watering the exposed surfaces three times a day may be too little. Additional mitigations to consider might include a small, portable enclosure to be placed over the current pulverization work area to trap the dust as it moves down wind.

## **Construction Traffic**

The inclusion of a preliminary Construction Management Plan starting on page 2-40 (pdf page 158) in the 2021 DEIR cleared a lot of concerns arising from uncertainties, and allows more focused and constructive feedback. However, the planned Outbound Haul Route on Beryl Street takes thousands of



trucks past the entrance to Towers Elementary School and may represent a hazard that requires mitigating actions, which I did not see in the DEIR.



EA-9  
(cont.)

Trucks leaving the site will use Beryl to reach 190<sup>th</sup> Street. This takes them by Towers Elementary School as the road bends to the north. This means that covering and wetting down the loads will be vital to keep airborne pollutants under control. An even more significant issue in my mind is the possibility of a runaway truck due to brake failure on the descending hill. At least twice a school day the area outside the parking lot gate is loaded with cars, parents and children either arriving at school or leaving for home. Under such conditions an out-of-control heavy hauling truck could precipitate a horrible accident.

Truck Haul Trips (Phase 1)	
Asphalt Export	575
Soil Export	1250
Concrete Import	1162
Demolition Export	2000
Soil Import	875
<b>Total Trips</b>	<b>5862</b>



EA-9  
(cont.)

I surveyed the Beryl downgrade that starts at the intersection with Flagler Lane and found it to be approximately a 9% grade, not real steep, but a challenge to a heavily loaded haulage truck. Using the accounting of truck trips during Phase 1 construction above, I compute a total of 5,862 heavy trucks will pass this way. If the trucks have a brake dispatch reliability of 0.9999 (one in 10,000 failure rate), I compute the probability of at least one runaway truck during the total Phase 1 period is 0.44. A serious risk with this probability of occurrence would need remedial action.

I think the 0.9999 reliability assumption is a reasonable starting point for investigating the threat. I do not know what a reasonable number would be based on statistical data from hauling trucks. The EIR process should take this on as a task to get a more fact-based number for a proper risk assessment.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 11:40 AM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Comments to be Read into the Record

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**From:** Elisa Nye <elisanye@gmail.com>  
**Sent:** Wednesday, March 24, 2021 5:01 PM  
**To:** Communications <Communications@bchd.org>  
**Subject:** Public Comments to be Read into the Record

To whom it may concern:

I would like to voice my concerns about the upcoming plans for the "Healthy Living Campus" that is being discussed in tonight's meeting.

EN-1 I live in the neighborhood near the campus and am very concerned about the plans that are being considered for the following reasons:

- The traffic and congestion is already considerable at 'normal' rush hour time on Prospect Avenue. I commute to work going right by the campus and am very concerned that getting in and out of the neighborhood is going to become very difficult during & after this is built.
- Many of my family's doctors are currently located on the BCHD campus. Displacing them will make it much more difficult for us to access our regular health care.
- The current plans for the indoor aquatic center are a joke and will not address the needs of our community. We need proper outdoor swimming pools that can support lessons, swim teams and rehabilitation. We do not need an aquatic amusement park.
- My daughter goes to elementary school right over the hill and will soon be attending middle school down the road from campus. I am very concerned about the environmental impacts of this massive construction project going on as she goes to school.

EN-5 I strongly urge the board to take a hard look at this project and develop something that is the right size & scale for the community.

Thank you,  
Elisa Nye  
North Juanita Avenue

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:35 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD construction opposition

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**From:** Lis Schneider <lis3111940@gmail.com>  
**Sent:** Sunday, June 6, 2021 7:54 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** BCHD construction opposition

Dear BCHD committee,

ES-1 | My husband and I are 45-year residents of Torrance and have finally come to the point of being able to enjoy our years in a nice and safe neighborhood. To now hear of an unneeded and extensive demolition and development project directly above us?

As an elderly woman with COPD and breathing problems already, I feel this will have a serious impact on my health and the health of my surrounding friends, neighbors, and children!

ES-2 | I need and would like to know how many people within a 1-mile radius of this project have: 1) COPD 2) asthma 3) Emphysema 4) any lung-related conditions? How can there be a guarantee that the hazards of this project will not impact and/or make these conditions worse?

Seriously Concerned and OPPOSED,  
Elisabeth Schneider

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:02 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD Massive Commercial long term( years) Project!!

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**From:** Frank Briganti <fjbriganti@aol.com>  
**Sent:** Saturday, May 22, 2021 2:31 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** BCHD Massive Commercial long term( years) Project!!

For The Public Record.

- FB1-1| 1. I oppose the BCHD Project totally. noted previously in drafts to BCHD!!
  - FB1-2| 2. West Torrance residents (200+ Homes) were excluded regarding the Project and its Harm. (EPD, Medical, Noise, Dust, Exhaust, Toxins (medical), etc)
  - FB1-3| 3. Towers School was ignored. ( regarding all in #2 plus)
  - FB1-4| 4. West Torrance traffic ( massive construction trucks, Safety, Noise, etc)  
Truck routes will impact West Torr neighborhoods and Towers, West Hi, etc)
  - FB1-5| 5. Failure to note Completion & Financial Bonds (for all companies involved with Project!!)
  - FB1-6| 6. \* Extremely high massive Buildings (Commercial adjacent to Residential areas)  
Extreme window glare (day( and large lighting illumination evening into neighborhood!)
  - FB1-7| 7. Rodent infestation (health, sanitation) from Project into West Torr neighborhood )
  - FB1-8| 8.. Too many dangerous and safety problems to address all here!!
- Thanks Dr. Frank Briganti. West Torrance May 22, 2021

Sent from my iPad

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:44 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD Massive Commercial Long Term(10+yr) Project!

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**From:** Frank Briganti <fjbriganti@aol.com>  
**Sent:** Wednesday, June 9, 2021 2:38 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** BCHD Massive Commercial Long Term(10+yr) Project!

This is for the Public Record!

- FB2-1 | 1 I oppose the Project the whole Project. For numerous reasons items addressed previously .
- FB2-2 | 2. West Torrance Residents were not considered how it was going to affect them(200+) homes.
- FB2-3 | 3.Noise, dust.Toxins(demolition medical buildings-mold, asbestos, lead, mercury,medical specimens (surgery, labs etc) will blow and settle on the homes below the Project.(Tomlee Towers,Mildred,+++ ) \*\*Not Considered\*\*
- FB2-4 | The above will directly affect Towers school and playgrounds directly in the wind 5to 13. Mph daily. \*\* noise , truck fumes , toxins also adjacent to Flagler/Beryl streets!!
- FB2-4 | 4. Massive 130+ ft high is a Commercial structure in a Residential area!!
- FB2-5 | Overhangs -will emit strong window glare below and in the evenings strong illumination from light to residents below..\*\*\*Not Considered\*\*\*
- FB2-5 | 5.Traffic NO Truck routes for existing the Project!! All are not truck routes in the City of Torrance. Danger Safety issues in residential areas.
- FB2-5 | \*\* Numerous truck /construction equipment will delay Emergency Response( Fire, RDPD , Paramedic, ambulance response times.
- FB2-6 | Red Fire Dept station is too far removed from Site!!
- FB2-6 | 6..This a Commercial (Silverado \$\$\$\$)Project under the disguise as medical)
- FB2-7 | No problem reducing the size of massive Project.
- FB2-8 | A. Delete Silverado large expansion and reduce time frame to 1 yr only.
- FB2-9 | 7. No completion and financial Bonds Noted!!
- FB2-10 | 8. Not Noted working times.7 days -day and nights??
- FB2-11 | 9. Not considered Health affects on West Torrance residents( sinus, allergies,eyes, nose, hearing, etc. plus psychological affects.

Thanks Dr. Briganti. Tomlee Ave. Torrance,CA. June 9,2021

Sent from my iPad

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:53 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Comments to the BCHD DEIR

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**From:** Frank von Coelln <von@earthlink.net>  
**Sent:** Thursday, June 10, 2021 2:34 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Public Comments to the BCHD DEIR

To Nick Meisinger,

FVC-1 My residence on Tomlee is one of the homes that is within 80 ft. from the proposed structures that will loom over Flagler Lane. I am an original owner of our residence of over 52 years. My wife and I are in our 70's now and hope to spend our final years in the home where we raised our family. The threat of overdevelopment of the BCHD campus that will cast an afternoon and even shadow on my home is incredulous, as is the invasion of our privacy by dozens of windows peering into my backyard from the assisted living apartments. Redondo Beach residents didn't want the BCHD campus in their backyard at Diamond Lane and now, with the redesign, you are hearing the same from Torrance residents.

FVC-2 The proposed redesign will:

- Cause significant damage to blue sky views and major privacy issues.
- Subject residents to significant glare and night-time lighting of the 24/7 operations facility. DEIR provides no substantive analysis of impact.
- Create shadow effects that are significant to Torrance homes to East, Towers Elementary school and Redondo Beach homes to the North.

FVC-3 Key viewing locations (KVLs) are flawed and deceptive. Main KVL from 190th and Flagler used to justify mitigation of reduction of 20 ft. height is flawed.

- Viewing location is deceptive, one of the few viewing locations where the project site appears to be lower than street level, rather than elevated 30 ft. above street level to the East.
- View of PV Ridgeline from this viewing location is not representative of views Not the highpoint as stated.

FVC-4 RCFE is clearly Incompatible with surrounding neighborhoods. Its placement on the extreme perimeter of the property, combined with the proposed scale and mass causes the most damage to surrounding neighborhoods.  
Violates General Plan land use policies for cities of Torrance and Redondo Beach municipal code to be “compatible in scale, mass, and character with surrounding neighborhoods.”

FVC-5 Please don't cause me to suffer the indignity of having to leave my residence for all of the reasons above and countless others that your concerned neighbors are respectfully submitting.

Respectfully,  
Frank Von Coelln



## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:08 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: benefit

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-----Original Message-----

From: Fred Fasen <fredfasen@me.com>  
Sent: Monday, April 12, 2021 10:20 PM  
To: Communications <Communications@bchd.org>  
Subject: Re: benefit

FF1-1 I would just like to know how will the building of such a pro profit structure benefits the citizens and residents of the 3 beach cities anymore than it already does? I would like to know when the tax payers gave the Board BCHD the freedom to give away OUR property?

FF1-2 Based on the EIR and noise abatement or noise suppression will not be successful because they will be driving the shoring beams very deep and the pounding will create too much vibration for the surrounding structures and above noise levels stated in the EIR.

FF1-3 Please come up with new and improved BCHD for the taxpayers

Sent from my iPhone

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:16 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Re:EIR

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**From:** Fred fasen <fredfasen@me.com>  
**Sent:** Wednesday, May 26, 2021 9:37 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Re:EIR

FF2-1 The report keeps getting larger and larger instead of smaller and shorter. When the citizens didn't approve of the original plan, it was stated that it would be downsized and smaller footprint,, no it's the size of the Staple Center!

FF2-2 The noise and traffic and pollution is too much for this small city

FF2-3 I have to say No Way to this proposal

Fred Fasen  
Redondo beach

Sent from my iPhone

Sent from my iPhone

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:34 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD

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**From:** Gary Dyo <garysdyo@yahoo.com>  
**Sent:** Sunday, June 6, 2021 4:20 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** BCHD

To Whom it May Concern:

- GD-1** I am OPPOSED to BCHD's (Un) Healthy Living Campus and 5 years of ACTIVE demolition and construction. These THREE things must be STOPPED:
- GD-2** 1) TALLER-the facility towers 103 ft. tall and 133ft. over homes. Will block sunlight and views from all directions.
- GD-3** 2) HAZARDOUS-Homes and schools are from 80 feet to a few 100 feet away.
- GD-4** 3) TRAFFIC/CONGESTION- 10,000 heavy haul truck trips coming into my neighborhood.
- GD-5** The BCHD project must not commence for the reasons above.

Sincerely,

Gary Dyo  
garysdyo@yahoo.com

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:51 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD proposed building project on Prospect

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**From:** gtafremow@verizon.net <gtafremow@verizon.net>  
**Sent:** Thursday, June 10, 2021 11:54 AM  
**To:** cityclerk@redondo.org <cityclerk@redondo.org>; cityclerk@torranceca.gov <cityclerk@torranceca.gov>; citycouncil@hermosabeach.gov <citycouncil@hermosabeach.gov>; cityclerk@citymb.info <cityclerk@citymb.info>; skeller@rbusd.org <skeller@rbusd.org>; superintendent@tusd.org <superintendent@tusd.org>; stowe.tim@tusd.org <stowe.tim@tusd.org>; rbpta@rbusd.org <rbpta@rbusd.org>; torranceptas@gmail.com <torranceptas@gmail.com>; Communications <Communications@bchd.org>; EIR <eir@bchd.org>; pnovak@lalafco.org <pnovak@lalafco.org>; GChen@TorranceCA.Gov <GChen@TorranceCA.Gov>  
**Cc:** TRAO90503@gmail.com <TRAO90503@gmail.com>; 'LINDA Zelik' <linzelik@gmail.com>; plafremow@verizon.net <plafremow@verizon.net>  
**Subject:** BCHD proposed building project on Prospect

To whom it may concern,

We are 25-year residents of north west Torrance and live less than 2 blocks from the proposed building site.

GPA-1 Our neighbors have been actively involved for years and frequently voiced our opinions against this terrible travesty at both the in-person and zoom meetings. Unfortunately, all of our very valid concerns not only have fallen on deaf ears, but the project's proposed square footage and height keeps mushrooming, getting more absurd each year. Tragically, the adverse consequences for the community are much worse now than even when originally proposed.

We are vehemently opposed to this ill-advised monstrosity for many reasons:

GPA-2 **\*Health hazards.** The demolition and construction for 5-10 years will result in fallout from the airborne contaminants including concrete dust, asbestos, lead, PCB's & probable mold, among others. These contaminants will certainly be detrimental to the local residents, particularly school children, seniors and persons with asthma. It is not hard to anticipate many **expensive lawsuits** from this. Within a one-mile perimeter there are five schools whose students will be adversely affected, Towers Elementary, Parras Middle School, Beryl Heights, West High and Redondo High. Most especially Towers as their playground is less than 100 feet away! Have you considered that the **children will not be able to play outside for well over five years?** Have you even cleared this with the respective school boards?

GPA-3 **\*Illegal Zoning.** This 11-acre plot of land was never intended for a **commercial, for-profit business.** This was always intended to be for the use of, and the betterment of, the local residents. This high-priced business venture to house rich senior citizens **absolutely does not qualify!** Therefore, you are **breaking the longstanding laws and codes** put in place to protect local citizens.

GPA-4 **\*Traffic/Safety Issues.** The streets around Prospect, Beryl, Flagler and Del Amo (which surround a large strip mall) are already extremely congested. This project would not only double the traffic congestion but would cause severe safety issues for the children attending the five schools mentioned above. Children cross these surrounding streets by foot, on bikes and on skateboards. Again, our children should not be subject to these life and death dangers that this project will create. If you don't care about children's lives, do you at least care about the lawsuits that will result?

GPA-5 **\*Quality of Life for Redondo and Torrance residents.** This mammoth project does **not fit** into this residential community! Building something the size of The Staples Center in a residential area is detrimental to our quality of life in many respects. One of which is that it will block sunlight and ocean breeze for the nearby residents. Not to mention, our property values have decreased because this over-building plan **might** go to fruition.

GPA-6 **I implore you, please DO NOT go forward with this proposed project!** Certainly, you can find other, more community friendly uses for this land.

George and Pam Afremow  
19412 Linda Dr., Torrance

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 11:32 AM  
**To:** Meisinger, Nick  
**Subject:** Fw: stop the steal ! (and I don't mean the 2020 election)

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**From:** Stephen Parker <sparker100@verizon.net>  
**Sent:** Sunday, March 14, 2021 4:58 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** stop the steal ! (and I don't mean the 2020 election)

Dear BCHD Board

Let's start with this. Don't build the \$374 million, 253000 square foot monstrosity

I don't care if the architect had designed the Lincoln Memorial

This community does not need this

GP1-1 I speak for my wife and brothers and myself.

You receive \$4 million a year in tax revenue.

Don't waste it on this

Tom Blakey, don't wrap it around with crap about "a sense of place" this sounds more like the PR crap that was used to promote The Point in El Segundo.

Youth Counseling we need more of I agree but this area of over the top white entitlement and over the top white privilege (and I am white) needs low-income housing for seniors of all colors or affordable housing for all lower-income member of our

GP1-2 South Bay Community.

And then you have a shameful Gaul to consider a \$12,000 monthly rent to seniors who live there

Healthy needs include healthy eating, weight loss getting off prescription drugs, unhealthy addictions to social media, and other social services for the South Bay Community

Not everyone who lives here is in the top 1% or even the top 10% of income earners

Enough has already been stolen from the US Treasury giving these high earning income groups tax breaks from Donald J. Trump and his band of Republican thieves

And the greatest beneficiaries during the pandemic have certainly these income groups

GP1-3 So this is not the best use of the money you propose if you really intend to serve a diverse cross-section of the South Bay In 2020 I voted for "new blood" to be on the board.

Too many have been there too long and should be termed out if those rules were in place

I VOTE ALONG WITH MY WIFE AND BROTHERS WHO GREW UP IN HERMOSA BEACH AND WE SAW THE CLOSING OF THE SOUTH BAY HOSPITAL.

YOU NEED TO COME UP WITH A BETTER USE OF THE USE OF OUR HARD EARNED AND PROVIDED FUNDS

ANSWER MY LETTER PLEASE  
THANK YOU FOR THE FORUM

GEORGE PARKER

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:29 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Comment to BCHD DEIR  
**Attachments:** BCHD May Board Report Shows EIR Self-Approval Moved up to August.pdf

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**From:** Glen and Nancy Yokoe <ninjabytes@hotmail.com>  
**Sent:** Friday, June 4, 2021 10:11 AM  
**To:** CityClerk@Redondo.org <CityClerk@Redondo.org>; cityclerk@torranceca.gov <cityclerk@torranceca.gov>; citycouncil@hermosabeach.gov <citycouncil@hermosabeach.gov>; cityclerk@citymb.info <cityclerk@citymb.info>; skeller@rbusd.org <skeller@rbusd.org>; superintendent@tusd.org <superintendent@tusd.org>; stowe.tim@tusd.org <stowe.tim@tusd.org>; rbpta@rbusd.org <rbpta@rbusd.org>; torranceptas@gmail.com <torranceptas@gmail.com>; Communications <Communications@bchd.org>; EIR <eir@bchd.org>; pnovak@lalafco.org <pnovak@lalafco.org>; pnovak@lalafco.org <pnovak@lalafco.org>; CityClerk@Redondo.org <CityClerk@Redondo.org>  
**Subject:** Public Comment to BCHD DEIR

Ladies and Gentlemen,

GNY1-1 Speaking for my family and hundreds of concerned neighbors, including the elderly, developing pre-school and school-aged children, we oppose the proposed BCHD HLC project.

GNY1-2 The traffic nightmares and dangers, increased noise, dust, and 24-7 air pollution(irritants and confirmed carcinogens)occurring over 5+ years will harm our community to benefit a private money-making enterprise of an oversized, incompatibly designed and placed assisted living facility looming over our homes in west Torrance.

The HLC is dubiously speeding forward by BCHD and most of its Board of Directors, ignoring and defying an overwhelming opposition to it by the surrounding and nearby citizenry, who disapprove of it for a myriad of good reasons.

GNY1-3 The attached BCHD DEIR deficiencies noted are extensive and are rife with misrepresentations, inaccuracies, and omissions. These are well pointed out and documented by the City of Torrance Community Development Department, whose letter to Mr. Nick Meisinger, Environmental Planner, Wood Environment & Infrastructure Solutions, Inc., regarding the DEIR has been approved by the Torrance City Council. Councilmembers, at their May 25th meeting voiced similar concerns of the residents being negatively affected in our neighborhood.

This project is an affront to the legitimate health and well-being concerns of affected families young and old who have chosen this area of the south bay for its clean air, top schools, and like-minded safety and health-conscious neighbors and leaders.



Respectfully,

Glen and Nancy Yokoe  
Residing on Tomlee Ave, north cul de sac

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:52 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Comment to BCHD HLC

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---

**From:** Glen and Nancy Yokoe <ninjabytes@hotmail.com>  
**Sent:** Thursday, June 10, 2021 1:33 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Public Comment to BCHD HLC

To Whom It May Concern,

Again, we are stating our opposition to the massive HLC and its adverse effects on the surrounding residents in Redondo Beach and Torrance. It has been shown through signed petitions, written input, and attendance at BCHD BoD meetings that the vast majority of the citizenry has a myriad of grave concerns over this project.

The DIER has many flaws and deficiencies in that it makes assumptions, omits data, minimizes dangers and is lacking in analysis including Land Use, Aesthetics, Transportation Hazards, Noise, Air Quality, and Hazardous/Toxic materials. Additionally, Phase 2 descriptions are vague and lack proper visualizations.

Some problems, though certainly not all, include the following:

1. The HLC structures, placed at the extreme perimeter of the BCHD property are incompatible with adjacent communities and violate General Land Use policies.
2. Demolishing the 514 building exposes residents, including children in nearby schools and the elderly to lead, mold, asbestos, silicates and other irritants and or carcinogens.
3. Excavation and trenching of >31,000 cubic yards of soil containing significant amounts of PCE, as already found and documented in 29 of 30 samples, and is particularly high in the northeast vacant lot along Flagler Lane, will release enormous amounts into and on to surrounding neighborhoods and during heavy truck transport of it on our streets.
4. Air Quality on site problems exceed SCAQMD standards. Concrete grinding at site produces unmitigable air pollution as wind speeds in this area are high and variable on a 24/7 basis.
5. Significant Vibrations and Noise can't be mitigated. Noise will exceed FTA thresholds adversely affecting hearing, sleep interference, physiological response, annoyance, and overall wellbeing.

GN Y2-8 The BCHD HLC is an Unhealthy affront to the like-minded citizens who chose a healthy environment here in West Torrance and Redondo Beach to raise their families, work hard, sacrifice and put their resources into an exemplary community in which to live their lives.

Respectfully,  
Glen and Nancy Yokoe  
West Torrance, Pacific South Bay residents

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:58 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Comments to the DEIR

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**From:** Grace DuVall <gduvall@outlook.com>  
**Sent:** Thursday, June 10, 2021 4:43 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Public Comments to the DEIR

GDV-1 | As a lifetime resident of Torrance, I am extremely concerned about the BCHD project. There are so many health issues that would impact students at Towers and all the surrounding schools and homes. The DEIR downplays significant impacts.

GDV-2 | The massive assisted living facility is completely Incompatible with surrounding neighborhoods in scale, mass and character. the very things that both Torrance and Redondo Beach municipal code clearly states it violates.

GDV-3 | Please provide more details on the health impacts of noise, air quality and hazardous materials. The DEIR was deficient in providing the full scope of health impacts on our community.

Thank you,

Grace DuVall

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:07 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: NO to the BCHD Development

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**From:** Greg Podegracz <gregpode@gmail.com>  
**Sent:** Tuesday, April 13, 2021 8:32 AM  
**To:** Communications <Communications@bchd.org>; EIR <eir@bchd.org>  
**Subject:** NO to the BCHD Development

- I am a resident on Paulina Avenue and have owned the house since 1976.
- GP2-1 I am asking that this project at the BCHD site be cancelled due the impact it will have on the surrounding neighborhood.
- GP2-2 This project is TOO BIG and TOO INTRUSIVE on our neighborhood.
- GP2-3 There are plenty of areas around the South Bay that could be torn down and have a project like this built.
- GP2-3 OR wait till the power plant is torn down and use the area where the power lines are to make a project like this.
- GP2-4 I will do whatever I need to do to see that this MONSTROCITY of a building does not go in and ruin this neighborhood.
- There are other options.

Greg Podegracz

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:59 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD HLC DEIR comment

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**From:** Hamant and Robin Patel <hamrobpatel@gmail.com>  
**Sent:** Monday, May 17, 2021 12:07 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** BCHD HLC DEIR comment

To BCHD/Wood Environmental and Infrastructure Solutions, Inc:

The CEQA states that Economic, social, and particularly housing factors shall be considered by public agencies together with technological and environmental factors in deciding whether changes in a project are feasible to reduce or avoid the significant effects on the environment identified in the EIR. If information on these factors is not contained in the EIR, the information must be added to the record in some other manner to allow the agency to consider the factors in reaching a decision on the project.

Economic fairness for the BCHD project can be defined as when the affected city residents (Redondo Beach, Manhattan Beach, Hermosa Beach, and Torrance) and BCHD/Developer equally benefit from the project's success. This means that all opportunity and prosperity are shared and inequities between the different groups are reduced. Meeting this objective requires all parties to acknowledge a number of instances of unfairness – from the disruption of daily lives for the construction and operation of the new facilities, lack of access to future residents (affordability), use of city resources (money) for potential gain of a private sector to project justification.

HRP-1 Per a 2019 article in the Daily Breeze, the health district was formed in 1960 to fund a then-rural hospital. Currently the BCHD is focused on preventative health with approximately 40 programs. The district received about \$3.7 million 2019 property tax revenues from the cities of Redondo Beach, Manhattan Beach and Hermosa Beach which accounts for 26% of its revenue. The balance of funds is generated through leases, partnerships and fees. BCHD will be partnering with an external party for the construction and operation of the facilities.

New development under Phase 1 would include a 203,700-square-foot (sf) Residential Care for the Elderly (RCFE) Building with 157 new Assisted Living units, 60 Memory Care units (replacing the existing Silverado Beach Cities Memory Care Community located within Beach Cities Health Center), 14,000 sf of space for the Program of All-Inclusive Care for the Elderly (PACE), 6,270 sf of space for Community Services, and a 9,100-sf Youth Wellness Center. Following the construction of the RCFE Building, the existing 158,000-sf Beach Cities Health Center would be demolished providing space for approximately 114,830 sf of open space as well as an approximately 40,725-sf surface parking lot with 86 (including accessible parking spaces and electric vehicle [EV] charging stations). Two of six project objectives are to address the growing need for assisted living with on-site facilities and to create a modern campus with public open space and facilities designed to meet the future health needs of residents. The DEIR states that the proposed RCFE growth of 177 residents is an increase of 1% of the relative populations of Redondo Beach and Torrance. The DEIR states that the new Assisted Living units are a primary objective of the project. The DEIR does not provide sufficient analysis to support whether the new residents will be from the supporting cities (Redondo Beach, Hermosa Beach, Manhattan Beach) and whether the residents of those cities will be able to afford the monthly rent. Additional analysis is needed to justify the cost of the facility to the residents of the supporting cities.

- HRP-2 | The proposed Project is projected to generate short-term employment opportunities during construction, which would draw workers from the existing regional workforce. Clarification is needed to define “existing regional force” and whether this regional workforce would benefit the supporting cities.
- HRP-3 | The DEIR also states that Phase 1 and Phase 2 of the proposed Project are expected to employ approximately 170 full-time equivalent employees drawn mostly from the existing regional workforce. The proposed Project is not expected to substantially affect long-term employment opportunities. The DEIR establishes that there will not be an economic labor benefit to the supporting cities.
- HRP-4 | The DEIR Section the economic feasibility of the project. Additional analysis/information is required:
1. Include analysis of Redondo Beach, Hermosa Beach, and Manhattan Beach that justifies the need for a new facility. The following should be included:
    - a. Analysis on existing assisted living facilities in Redondo Beach, Hermosa Beach, Manhattan Beach and Torrance. The analysis should include how many beds are available, the occupancy rate, and the projection of beds required in the future.
    - b. Current and projected age demographics of the 3 beach cities
    - c. Current and projected median income of the targeted residents of the BCHD Healthy Living Center
    - d. Projection of the cost to live in the BCHD Healthy Living Center and occupancy requirements to support the costs
    - e. Financial cost comparison between the proposed units and the BCHD’s current facility (Silverado)
  2. Include financial analysis for when the beach cities will recover their investment (bond) from the venture and how the partnership arrangement will function.
- Adequate information to justify the use of the publicly funded health district assets for this project is incomplete and needs to be addressed.

Thank you.  
Robin Patel



## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:13 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public comments to BCHD DEIR

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**From:** jack holman <jackholman310@gmail.com>  
**Sent:** Tuesday, May 25, 2021 5:29 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Public comments to BCHD DEIR

Hello again,

JH-1

I know, I misspelled Beryl to Berle. Figures.

But please don't think that lessens my objection to the BCHD building project. Not on your life.

Regards,

Jack Holman  
19414

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:26 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Comment -BCHD proposed project

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**From:** Jacqueline Caro <pegasusbluesky@yahoo.com>  
**Sent:** Wednesday, June 2, 2021 5:44 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Public Comment -BCHD proposed project

June 2, 2021

Comments on BCHD DEIR:

The DEIR is over 900 pages long. It is difficult to go through, not only because of length but page numbers do not correlate with the pdf numbers of the scanned report. For example, their page number can indicate 3.2-51, but to see this page I would need to go to page 320.

I know the public comment was extended, but during this period public school transitioned from zoom school to a combination of in person instruction. This created added difficulties for parents who work from home due to the pandemic to also manage a new schedule and yet find the time to read a 900+ page document.

**Phase 1** –This all takes place near Flagler & Beryl. It will affect Torrance residents east of the BCHD property & Towers Elementary & Redondo residents north on Beryl & N. Prospect.

**Noise** – (Pg. 32-35) is unavoidable according to the report. Demolish old BCHD hospital on site. Hours of Construction for 2 years & 5 months, 6 days a week. Monday – Friday 7:30AM – 6PM & Sat. 9AM – 5PM. This time frame is only if construction runs on time without delays. Most of construction is to take place near Beryl & Flagler. Please give a time frame if construction has delays due to weather, etc.

The constant noise would interfere with Tower's Elementary School's teacher's ability to educate their students. Have you contacted the school and parents? They must be notified to address such a huge project. The noise would also interfere with people who work remotely from home.

**Energy -**

The report states the removal of 20 trees located on Diamond to make room for a SCE substation & substation generator yard large enough to provide power to Phase 1 & 2. The report directs the reader to Fig. 2-5 & 2-7. Could you provide the measurements of the substation and generator?

The current trees act as a "green barrier" for the homes on Diamond. It is dangerous to put this generator across the street from the residential homes on Diamond and N. Prospect. It could affect the mental well-being of the residents subjected to the constant noise of a generator. Please state how loud the generator will be and the impact of this noise to the residents of Redondo Beach and Torrance.

**Flagler Lane** – The project proposes to dig a 26 ft. deep excavation of the hill (Flagler & Beryl) to create a subterranean service area & loading dock. Pg. 375. This street is also used by parents who drop off and pick up their children at Towers Elementary. It can become quite busy. It's not safe to put a loading dock which would be used by delivery trucks on Flagler Lane. This street leads into a residential neighborhood. Please include a traffic study for Towers Elementary and Beryl Elementary traffic and how it impacts the intersection of Flagler Ln. and Beryl St.

**Truck Haul Route** with hazardous waste covered to go down Beryl (right past Towers Elementary) to 190<sup>th</sup> & use Crenshaw Blvd. to get to the 405 freeway. Your diagram on pg. 160 for truck haul route does not identify Beryl. Can you add the name of Beryl to Fig. 2-10? Could you also notify Towers Elementary school and parents?

**Hazardous Waste** – You have identified asbestos, PCB's which have no taste or smell and particulate matter all of which can be inhaled. The at- risk groups for this are: the elderly and young children. The proposed project is near Towers Elementary and Dominguez Park that features a playground, Little league baseball field and dog park. It's not healthy for these groups to be exposed to carcinogens.

**Air Quality** – (Pg. 263) You explain the susceptible groups affected by air pollution are; children, the elderly, athletes and people with cardiovascular and chronic respiratory diseases. The report does identify all the numerous public parks and schools nearby. However, the report fails to identify the high school track teams which use Del Amo to run westward to

JE1-8 (cont.) practice, as well as many other surface streets in the area. Some physical education classes have also used Sunnyglen park. Have you notified the high school athletics department?

JE1-9 **Population & Housing** – You have stated that the proposed project will create 170 new jobs. Can you clarify if they will be part-time or full-time employees? Their assigned hours will affect traffic.

JE1-10 **Incorrect** – Pg. 234 describes the Providence Little Company of Mary building as a 4-story building. It is 3 stories. (You correctly identify this on pg. 127.) The Beach Cities Health Center is described as 5 stories, but please clarify the building is 4 stories above ground. There is a small area that sits atop this building, but does not extend to the entire length of the building. Can you clarify this?

JE1-11 **Shade** – Pg. 270, 271 -The report explains that the shade of the 6 story (203,000 sq. ft.) building will affect the north east portion of the BCHD property. This affects the Redondo neighborhood across from Vons, the Torrance neighborhood and Towers Elementary. The school playground has been used afterschool for sports practice. Please include how the shade would affect afterschool practice. Can you also state how this shade will affect homeowners who have invested money to install solar panels to generate electricity.

JE1-12 **Aesthetics** – Pg. 263 The report states that the proposed construction is compatible with the character of the Torrance & Redondo neighborhood. The report acknowledges that the BDHD property is in a R-1 neighborhood in Redondo & Torrance. Multi-units on Beryl & Prospect in Redondo. The Vons shopping center consists of 1- story Store fronts. The RCFE building would be taller than the Torrance Memorial Hospital (pg. 232) which is located on Lomita Blvd. The Golden West Tower in Torrance is located 3 miles away from this project. The Delphi Apartments in Redondo is located 2.6 miles from this project. Neither building is located within multiple public schools, parks and residential homes. The BCHD property is uniquely located is within public schools, parks and residential homes. The report states the project is consistent with the character of the neighborhood. (pg.263) I disagree. This proposed project would greatly affect the aesthetics of this residential neighborhood.

JE1-13 You also provide a list of trees to be considered to replace removed trees. (pg.225) Most of the trees listed are slow growth trees and on average only grow to 25 feet. This would not mitigate the RCFE building with a height of 103 feet, 133.5 feet from Flagler. Please include heights and growth rates of any foliage/trees to be planted at the proposed project.

JE1-14 **Phase 2 - Shade** – The 8 ½ story parking structure would create shade for the Torrance neighborhood to the east and Redondo residents. This is not addressed in the report. Please include how homeowner's solar panels would be affected by the shade caused by the parking structure. Also, please include diagrams of the shade from the proposed parking structure to demonstrate effect on surrounding neighborhoods.

JE1-15 **Transportation** – (pg. 735) The report states the project will add 376 net daily VMT, but does not address drivers who speed through a solid red light at the intersections. Recently, I have witnessed this on the intersections of N. Prospect & Del Amo & Wayne Ave. & Del Amo during non-peak times. This reckless driving behavior has been happening for the past 4 years. I'm concerned for the safety of the pedestrians, athletes and safe drivers. The traffic studies only count vehicles, but don't monitor dangerous drivers. I'm concerned about my safety and others as additional cars are added. Could you do a study on drivers who run through a solid red light on Prospect & Del Amo? It just happens very often.

JE1-16 **Alternative Option** - The report gave 6 alternatives for this project. I would like to see a 7<sup>th</sup> Alternative which would address the financial shortfall of BCHD. For example, the passage of a bond or a slight membership increase for classes offered.

JE1-17 Overall, the developers of the past showed respect to their residential neighbors in Torrance and Redondo Beach. It's evident by the current green space on Diamond, Flagler & N. Prospect, the central location of the power generator and the building height.

In Torrance, the Oakmont assisted living facility has only 2 stories. Likewise, the Kensington in Redondo Beach cooperated with the community and stands at only 2 stories. The Providence Outpatient & Imaging center in Torrance worked with the community to build a 3- story facility. I would hope that Beach Cities Health District could do the same. The proposed Phase 1 development primarily benefits the privately owned assisted living facility to be built at 203,700 square-feet. It does not fit with the aesthetics of the surrounding residential neighborhoods and schools.

Jackie Ecklund  
Torrance Resident

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:50 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Comment DEIR

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**From:** James Ecklund <james.ecklund@yahoo.com>  
**Sent:** Wednesday, June 9, 2021 8:22 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Public Comment DEIR

JE2-1 The proposed site power demand is alarming and unreasonable considering that in 1958 the building had far less efficient fixtures and amenities. The estimated load of 1,144,345 kWh for phase 1 and 4,989,622 kWh for phase 2 combined will be more than twice the original building's consumption. Consider more efficient appliances and recalculate this estimate while sharing the details of solar panels, solar water heating, etc. to reduce the load drawn from the power grid.

JE2-2 Clearly explain the use of the generator to be located on this property which will be much closer to residents than the existing generator. Will it be run only during power outages or will be used to reduce the peak demand at the site or only during SCE's requested load reduction when power demand exceeds state supply. This must be disclosed in the EIR. Noise from the generator operation was not considered.

JE2-3 Update table 3.5-1 to include 2018 electricity consumption for Redondo Beach. If LA county data is available for 2018 then it's deceptive to use 2010 data for Torrance and Redondo Beach. The proposed parking garage alone is estimating more electricity demand than the existing facility. This is wasteful and makes no sense considering current technology in 2021.

JE2-4 Overall the Draft EIR is misleading (estimated energy demand does not consider sustainability features), confusing (electrical yard is figure 8 or 15 depending on the diagram) , and contains non-pertinent information (California's electricity generation data). It's clear to me this report is meant to confuse the public and is a poor representation of Beach City Health Districts best effort to be forthcoming and transparent with this project.

**Navarro, Ashlyn**

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:50 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Comments to the BCHD DEIR  
**Attachments:** Imai\_C\_Concerns\_2021\_06\_01.pdf; Bichanich\_J\_Concerns\_2021\_06\_08.pdf

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**From:** Jay Bichanich <jdbastro@verizon.net>  
**Sent:** Wednesday, June 9, 2021 9:47 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Public Comments to the BCHD DEIR

Please see the attached letters.

Thanks.

-Jay Bichanich

Torrance Homeowner and Resident

June 9, 2021

DEIR

Re: Proposed BCHD Expansion Project

Dear DEIR Representative:

I am a 25 year resident and homeowner on Tomlee Ave near the site of the proposed BCHD project. I have the following concerns regarding this development project. My concerns are as follows:

- JB1-1 | 1) During general construction, there will be many heavy trucks traveling around the neighborhood presumably using Del Amo Blvd and Prospect Ave. The persistent noise from these heavy vehicles will be a continuing irritant to nearby residents over extended periods (months / years) for the duration of the construction project which will last for 5 years.
- JB1-2 | 2) If it is completed, the population of over 300 tenants will result in increased ambulance visits with persistent sirens blaring, increased tenant visitor traffic, and in general increased traffic and congestion on neighboring streets. The added noise will substantially reduce the tranquility of my own neighborhood. The added traffic congestion will make entering and leaving my neighborhood more difficult.
- JB1-3 | 3) Property values will drop considerably during construction according to a local real estate agent. This will be due to the noise from heavy vehicles in the area, additional pollution from vehicles and legacy building demolition. Why do our property values have to be suppressed for over a decade? After construction, the increased traffic on Flagler Ln, Towers St, Redbeam Ave will permanently suppress home values on / near those residential streets.
- JB1-4 | 4) The final layout of the BCHD project looks massive. It appears overly grandiose and large compared to structures immediately surrounding it, including nearby apartment buildings and the many single family homes in the immediate area. The grand scale doesn't 'fit' the neighborhood.

Please do not proceed with this large construction project. Thanks for your time.

Sincerely,

Jay Bichanich

Torrance Homeowner and Resident

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:32 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Over sized senior husing

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**From:** Jaysen Surber <jaysen.surber@gmail.com>  
**Sent:** Friday, June 4, 2021 7:31 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Over sized senior husing

JS1-1 | My name is jaysen surber and live in North Redondo, life long resident and i oppose the plan for prospect and beryl...



## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 11:32 AM  
**To:** Meisinger, Nick  
**Subject:** Fw: eir comment regarding pool

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**From:** Jeff Widmann <jmwidmann@gmail.com>  
**Sent:** Sunday, March 21, 2021 11:07 AM  
**To:** EIR <eir@bchd.org>  
**Subject:** eir comment regarding pool

JW-1 | First, and to empathize, this must be very challenging for your team trying to bring all of these disparaging parties together to form a greaat package! Good luck with it.

My only comment is regarding the pool. I swim at redondo high (when it was open) as it is the only 25 yard pool in south redondo.

My wife and twins also. Even though the hours were limited for lap swimming, i cherished the time in the pool.

JW-2 | To spend all that money and not have a 25 yard long multi lane pool seems ridiculous. Especially since this is a swimming and water mecca.

The leisure pool is fine also and all that goes with it. But please do not sacrifice the 25 yard pool in the process. Like the article in easy reader stated, it only takes 6000 sq ft to make a regulation pool. You will make thousands of people very happy in the end and I will be there. If there is no 25 yard pool I will not be using the facility.

JW-3 | All else in the report is great to me. Anyway, thats my two cents. Thanks for likstening.

jeff and thom, ella and emily widmann  
414 sierra vista drive  
redondo beach, 90277  
310 947 4904

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:07 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD

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**From:** Jennifer Sams <ajsams@verizon.net>  
**Sent:** Tuesday, April 13, 2021 3:25 PM  
**To:** Communications <Communications@bchd.org>; EIR <eir@bchd.org>  
**Subject:** BCHD

JS2-1 To Whom it May Concern, I am extremely opposed to the overdevelopment that BCHD wants to put on the vacant lot on the corner of Flagler and Beryl. What they have dreamed up is too large in scope that encroaches on a quiet, safe residential neighborhood. My parents brought me home from the hospital when I was born, and I lived out my childhood in this house on 19331 Tomlee Ave. This part of Torrance is so quant and desirable that I have chosen to raise my family in Torrance. I now take care of my elderly parents as they live out their sunset years in that house. They never left because of the quiet and the neighborhood friends.

JS2-2 My parents and I are extremely worried about the noise, traffic, pollution, and loss of privacy for the years that it will take to build this monstrosity. Not to mention, that afterwards their backyard and home will be exposed to all the windows of the hundreds of assisted living units that can then look down onto them. The building JS2-3 itself is so large that my parents' house and those on the street will forever be in shadow. No longer will they be able to have a garden that needs sun. As a teacher, I worry about all the traffic and construction for the next JS2-4 5-10 years that will be up and down Towers and Beryl. The pollution will cause issues for student health, and with constant construction, students will have trouble hearing. Their learning will be impacted.

JS2-5 Why is this necessary for Redondo, Hermosa, and Manhattan? This doesn't benefit anyone living in Torrance, yet you are building it in our back yard. Why don't you find some of your own land, or better yet, encroach upon your own homes and build what you want in your backyard. This would make logical sense.

JS2-6 Please listen to us. Don't overdevelop that corner.

Sincerely, Jennifer Sams

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 11:49 AM  
**To:** Meisinger, Nick  
**Subject:** Fw: Absolutely Not - Healthy Living Campus

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**From:** Jim Mooney <wsuucclajim@msn.com>  
**Sent:** Tuesday, March 30, 2021 3:34 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Absolutely Not - Healthy Living Campus

We live just North of the proposed expansion of the BCHD site off Prospect Blvd. Prospect Blvd is a two lane road just north of the site which is already overwhelmed with PCH-diverted traffic, especially during rush hours.

JM-1 | Already the intersections of Beryl and Prospect and Del Amo and Prospect are overcrowded, also especially during commuting times. I have seen many accidents during normal times on Prospect including school children not able to cross streets safely.

JM-2 | We do not need more congestion and density to our already crowded beach community.

JM-3 | A mammoth development like this will create 15 years of construction and environmental harm and when finished will forever create an environmentally irresponsible footprint in an area that is already overbuilt.

What are we leaving for the next generation? More overbuilt communities with massive, intolerable traffic situations.

JM-4 | There are many other less crowded areas to put this type of development in Southern California. Please don't burden us with this and stop the plans right now.

Sincerely,

Jim Mooney  
1022 Fourth Street  
Hermosa Beach, CA 90254

This message may contain confidential and privileged information. If it has been sent to you in error, please advise sender of the error and immediately delete this message. Thank you for your cooperation.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:50 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Objection to the Assisted Living Facility Project

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**From:** Jingyi Li <jingyi36@hotmail.com>  
**Sent:** Wednesday, June 9, 2021 9:29 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Objection to the Assisted Living Facility Project

**JL-1** I strongly object to the proposed project of the Assisted Living Facility at Prospect Ave and Beryl St.

**JL-2** There are many schools for children of all ages just a few hundred feet away from the site, plus even more residential neighborhoods. The construction will be hazardous for the children and families. The long years of dusty air is unhealthy to breathe in.

**JL-3** The buildings will block sunlight and views for each and every house from all directions.

**JL-4** The traffic and congestion caused by the project will make everyone's commute substantially longer and more difficult.

**JL-5** We love the facilities at the location the way they are. We frequent many of them, if not all. We shop at Von's and Dollar Tree, eat at Top Wok, take our children to My Gym, and visit our doctors in the medical buildings. They have been a part of our lives for a long long time. Please, don't take them away!!!

**JL-6** No Assisted Living Facility at this location please!!!

Thanks,  
Jingyi

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 2:01 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: DEIR Comments for BCHD SCH No. 201 9060258  
**Attachments:** Davidson BCHD additional comments .docx

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**From:** Joan Davidson <j135cooper@yahoo.com>  
**Sent:** Thursday, June 10, 2021 5:58 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Fw: DEIR Comments for BCHD SCH No. 201 9060258

Please advise if this came through to you at 3:40 pm today.  
Thank you  
Joan Davidson

----- Forwarded Message -----

**From:** Joan Davidson <j135cooper@yahoo.com>  
**To:** eir@bchd.org <eir@bchd.org>  
**Cc:** CityClerk@TorranceCA.gov <cityclerk@torranceca.gov>; CityClerk@redondo.org <cityclerk@redondo.org>  
**Sent:** Thursday, June 10, 2021, 3:40:04 PM PDT  
**Subject:** Re: DEIR Comments for BCHD SCH No. 201 9060258

To Whom it May Concern

Please see additional comments for the:

**BCHD Healthy Living Campus Master Plan  
State Clearinghouse No. 2019060258**

Thank you  
Joan Davidson  
1525 Via Arco  
Palos Verdes, CA  
90274

On Thursday, June 10, 2021, 1:38:43 PM PDT, Joan Davidson <j135cooper@yahoo.com> wrote:

To Whom it May Concern,

Please find attached my comments for the BCHD [Healthy Living Campus Draft Environmental Impact Report \(Draft EIR\)](#)

Thank you  
Joan Davidson  
1525 Via Arco  
Palos Verdes Estates, CA 90274

**BCHD Healthy Living Campus Master Plan  
State Clearinghouse No. 2019060258  
DEIR Comments**


**Appendix B**

“• **Terrain Elevation** - The Project site is located on a small hill. Depending on the location, the difference in elevation between the Project site and surrounding receptors varies from 30 to 100 feet. SCAQMD 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. Per SCAQMD’s conservative guidance, all sources and receptors were modeled at zero elevation.”

- **DEIR failed to use the AERMAP (below) for terrain data preprocessor.** The terrain is very different with sensitive receptors located in several directions and terrains surrounding the BCHD producing different outcomes. AQMD requires “Nearby terrain and elevation considerations, such as elevation data sets and the resolution used, coordinate system, datum, complex terrain, etc.” **DEIR failed to do so.**

JD1-1

**AQMD: “Elevations**

The AERMOD modeling system includes [AERMAP](#) , which is a terrain data processor. Terrain data, available from the United States Geological Survey (USGS), is used by AERMAP to produce terrain base elevations for each receptor and source and a hill height scale value for each receptor. AERMAP must be used to develop the terrain data required for AERMOD.”

- **“Meteorology** - The Hawthorne Airport, California meteorological dataset (Station ID 3167) was used in dispersion modeling. The dataset was processed and prepared by the SCAQMD (SCAQMD 2020b) and captures localized wind patterns. [Figure 1](#) shows the wind rose diagram for the Hawthorne meteorological station showing that west and west-southwest winds prevail in the region. The most recent 5 years of available meteorological data were modeled (i.e., 2012 through 2016).”

**DEIR fails to use a meteorological station within 2019-2021, using instead 2012-2016 which fails to identify valid wind conditions. High winds within that time were not included in the DEIR. And Hawthorne Airport station does not best represent the high winds at BCHD.**

JD1-2

**AQMD:** “The meteorological station that best represents the facility’s meteorological conditions (such as prevailing winds), terrain, and surrounding land use should be used in all modeling analyses. This means that the closest meteorological station to the facility is not always the most representative meteorologically.

All technical justification used in choosing the appropriate meteorological station for dispersion modeling and health risk assessments should be included in the report submitted with the analysis and all electronic modeling files.”

## Margallo, Sydney

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 2:01 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD DEIR COMMENTS  
**Attachments:** Davidson BCHD DEIR Comments.pdf; BCHD DEIR NOISE comments .pdf; Davidson BCHD additional comments .docx

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**From:** Joan Davidson <j1135cooper@yahoo.com>  
**Sent:** Monday, June 14, 2021 1:38 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** 0120 DEIR, , E4%

To Whom it May Concern- today I sent out two emails to comment on the DEIR.

But only received one confirmation of receipt.  
Can you please advise that you have received both emails.

At two different times today.  
Thanks so much,  
Joan Davidson  
1525 Via Arco  
Palos Verdes, CA 90274

Comments sent in two separate emails:

DEIR Comments for BCHD SCH No. 201 90602584  
Yahoo/Sent

•

Joan Davidson <j135cooper@yahoo.com>  
To: eir@bchd.org  
Cc: CityClerk@TorranceCA.gov, CityClerk@redondo.org  
Thu, Jun 10 at 1:38 PM  
To Whom it May Concern,

Please find attached my comments for the BCHD Healthy Living Campus Draft Environmental Impact Report (Draft EIR)



Thank you  
Joan Davidson  
1525 Via Arco  
Palos Verdes Estates, CA 90274

EMAIL 2 SENT AT 3:40PM - DID YOU RECEIVE IT?

Joan Davidson <j135cooper@yahoo.com>  
To: eir@bchd.org  
Cc: CityClerk@TorranceCA.gov, CityClerk@redondo.org  
Thu, Jun 10 at 3:40 PM  
To Whom it May Concern  
Please see additional comments for the:

**BCHD Healthy Living Campus Master Plan  
State Clearinghouse No. 2019060258**

Thank you  
Joan Davidson  
1525 Via Arco  
Palos Verdes, CA  
90274

BCHD Healthy Living Campus Master Plan  
State Clearinghouse No. 2019060258  
DEIR Comments

"# 3.8-1 Table - Hazards and Hazardous Materials !

\$%&(' !)( \* )( +, ( - !./ ( !01+2!1+!-3 ( !&4. !\*%&- !.1!23, '1- ( !./ ( !4- ( !1\*!./ ( !01+2!% !)( '% ( 2!1!  
./ ( !01+2!% !./ ( !5 16 3-74( 8!9% : !;% %< ( 21+21! = ( % / > 4+3 30%!5 46 0?!  
!

DEIR fails .1!%2( @4%( 'A!2( . ( ) 6 3- ( !%+2B1)!3+C( -.3%( !./ ( !/%8%2- !1+!-3 ( !)( '% ( 2!1!./ ( !  
01+2!2( -, ) 33( 2!3!./ ( !D1+C( )-( <( 01). EF GFGH\$ / ( !5 HI<!%&- !.1!2( . ( ) 6 3- ( !./ ( !7( 1'173!  
%+2!( +C3!1+6 ( +. %!/%8%2- !1\*!./ ( !01+2!- ( ( +!1+! / 3.1)3 %!% ) 3%-#!

'Pond' on site!The Converse Report 2020!+1. ( - J!!

Converse Report 2020, Item: 2.3: !K%01+2!3!./ ( !, ( +. ( ) !1\*9%, ( '!' E\*) 16 !% ! ( %'A!%!  
" LFM.1!" LM#9%, ( '!' !%00( % ( 2!C% %+. E%+2!MN# = A!" L O' E. / ( !P3 ( !%00( % ( 2!0% . 3%A!  
7)%2( 2E%+2!&A!" LOQ!./ ( !P3 ( !%00( % ( 2!2( C( '10( 2!R 3/ !%8% ( &%! !\*3 '2#!!!

<( - ( % , / !2( . ( ) 6 3- ( 2!./ % !./ ( !36 6 ( 23% ( 'A!%2% ( +. !5 16 3-74( 8!9% : !R % !./ ( !\*1) 6 ( )!  
<( 21+21! = ( % / > 4+3 30%!5 46 0E%-1/ %2!%01+2#!

\$/ 3 !246 0!01+2!R % !)( 01). ( 2!3!./ ( !UV\$3 ( - E%W+ ( !FE" LQXEKD3AY !D1-. !.1!Z 1! [ 0!\*)!  
<4&83 / !5 46 03-75!%+2!- .% ( - !./ % ! "it was used as a sewage evaporation area. The  
dump is bounded by Flagler Lane and Beryl and 190<sup>th</sup> Streets."

5 HI<!%&- !.1!3+C( -.3%( !./ ( !4- ( !1\*!./ ( !01+2!% : +1R '( 27( 2!1+!./ ( !D\ 5 !-3 ( !%+2!3!3!11!  
R % !4- ( 2!\*) !- ( R %7( ! ( C%01)% 3!+!#5 HI<!%&- !.1!3+C( -.3%( B2( . ( ) 6 3- ( !3!./ ( !- ( R %7( !  
01+2!, 1+. %&+ ( 2!/%8%214- !R % . ( - !%+2!3!%+A!1\*!./ ( - ( !R % . ( - ! ( % ( 2!1+.1!./ ( !D\ 5 !-3 ( #!

\$( !, 1+-( @4( +, ( - !1\*!./ ( !- ( R %7( ! ( C%01)% 3!+!R 14'2!/%C( !, 1+. %&+ ( 2!- ( ) 3!4- !%+2!  
/%8%214- !, / ( 6 3 %- !%+2!/%8%214- !R % . ( - ! ( \* !% !./ ( !D\ 5 #5 HI<!%&- !.1!3( +. 3!A!3!./ ( !  
91+2!% !./ ( !D\ 5 !-3 ( !R % !%-1!%4- ( R %7( ! ( C%01)% 3!+!01+2!%+2!3!./ % !3!./ ( !  
K( -01+- 33( !0% .AY% !./ % !. ( ) 6 !\*1)! ( -01+- 333A!3 !23, 4-- ( 2!&4. !+1. !%+R ( ) ( 2#!

5 HI<!%&- !.1!3+C( -.3%( !./ ( !4- ( !1\*!%+AB%!'!0( )-1+-E, 16 0%+3 -E%7( +, 3 -!R / ( . / ( ) !0)3C( !  
1)!04&3 E%+2!R / % !, / ( 6 3 %- E, 1+. ( +. -!R ( ) ( !246 0( 2!1+.1!./ ( !D\ 5 !-3 ( !&A!%+A!  
- ( R %7( !R % . ( - E%+2!3!- 1E3 !3 !%4- % ( !-3 ( !\*1)!/ 46 %&+! ( - 3( +. 3%!04)01- ( - !-3, ( !R % . ( - !  
R ( ) ( !01. ( +. 3%A!246 0( 2!1+.1!./ ( !D\ 5 !-3 ( #!

!!!!!!!!!!!!!!5 HI<!%&- !.1!2( . ( ) 6 3- ( !./ ( !-14), ( !1\*!./ ( !!01+2!1+! = D\ 5 !P!\$H#!

D1+C( )-( !FGFG!<( 01). !- .% ( - !4+2( )J!4.1 **Subsurface Conditions** !Z )14+2R % ( ) !R % !+1. !  
( +, 14+. ( ) ( 2!3!%+A!1\*!./ ( !&1)3-7- !, 16 0'( . ( 2!1!%46 %8 46 !2( 0. / !1\*!XG\_\*( . !&7- !24)3-7!./ 3!  
%- ( --6 ( +. #9' ( % ( !0)1C3( !./ ( !-14), ( !1\*!./ ( !01+2!1+!./ ( !D\ 5 !-3 ( !%+2!5 HI<!3+C( -.3%3!+!1\*!

JD2-2

!  
!

X# #! Hazards and Hazardous Materials - DEIR!  
2(.( )6 3( !3!./ ( !, 1+. 3+4 ( 2!-14), ( !1!./ ( !/ 3. 1)3 %!01+2 !%+2 !3!3 !R % !%+4)%!  
0/( +16 ( +1+!5 H!<!%3! 1!%+!A8( !%\*( , .- !./ ( !7( 1'173 !-. %833A!1!./ ( !=D\ 5 !-3 ( !3!./ ( !  
R % ( )!-14), ( !3 !-. 3'!0) ( - ( +. #!

5 H!<!%3!- !. 1!2 ( 03 . !%+A!7)14+2R % ( )!-14), ( - ER / ( . / ( ) !+4)%'A!1, , 4))3+7!1)!, %4- ( 2!&A!  
6 %+\_6 %2 ( !, 1+233!+- E. / %!, %4- ( 2!./ ( !\*1)6 ( )!01+2E%+2!./ ( !\*4.4) ( ! \*%, .- !+!./ ( !  
&4323+7E3-Y-. %833A! ( \*%, .- !401+!./ ( !/ ( %CA!, 1+-.)4, . 3!+!1)!%AQ-. 1)!&4323+7!1!& ( !  
, 16 0' ( . ( 2#!

5 H!<!%3!- !. 1!2 ( . ( )6 3( !%+!A- 3 !1!, 1+. ( +. - !1!./ ( !/ %833A!214- !R % . ( - ! ( \* !&A!./ ( !01+2E  
01-- 33 ( !- ( R %7( !R % . ( - ! ( \* !&A!./ ( !01+2E%+2!7( 1'173 !3-4 ( - ! ) ( ' % ( 2!1!./ ( - ( !  
, 3, 46 - . %+, ( - #\$/ ( !5 H!<!%3!- !. 1!, 1+- 3( ) !%+2!3-C ( - . 3% ( !./ ( !7( 1'173 !1) ( !+C3!1+6 ( +. %!  
3-4 ( - !1 %2!7% ( +. !%+2E5 16 3+74( 8!9%: !%+2\*3'E%+2!1!1) ( , % . !, 1+-.)4, . 3!+!3-4 ( - !./ %!  
, %4- ( !- ( .. '3+7!%+2!, )% : - !%+2!1./ ( ) !-. %833A!3-4 ( - #5 H!<!%3!- !. 1!%+!A8( ! ( \*%, .- !401+!./ ( !  
5 16 3+74( 8!9%: !%+2\*3' ( 2!% ( % !R / ( ) ( !401+!%4/ 3. 1)3 %!&4323+7!3 !1, % ( 2!%+2!% ) ( %2A!  
-4 \*% ( )3+7!\*)16 !, )% : - !%+2!- ( .. ' ( 6 ( +. #a)16 !%+!% ) 3%!0 ( )-0 ( , . 3( !./ ( - ( !0)10 ( ) . 3 - !% ( !  
) ( ' % ( 2!3+! . 35 ( !%+2!4- ( !1!./ ( !C% %+. !%+2- #V+2!./ ( ! ) ( %!01-- 333A!1!./ ( !=D\ 5 !-3 ( !  
01+2!& ( 3+7!4- ( 2!1) !./ ( !- %6 ( !- ( R %7( !R % . ( - #

5 H!<!%3!- !. 1!22) ( -- !./ ( !- ( .. '3+7!1!./ ( !%+2!2!7% ( +. !% !./ ( !5 16 3+74( 8!9%: !%+2!  
01. ( +. 3% !. 1!%\*( , . !./ ( !=D\ 5 !-3 ( !3!, 1+233!+- !% ( !240'3 % ( 2!% !=D\ 5 !

*In the Daily Breeze, Kristin Agostoni, 9/20/2017, article notes: 'The Redondo Beach museum located at the Dominguez Park sits on solid ground, but a back room added 14 years ago rests on infill material that apparently isn't stable enough; a gaping crack runs from the cottage's rooftop and down its eaves and siding.' "Obviously that area was a landfill, and over time there's been some settling," said Cornerstone Construction's Vic Braden, a Redondo Beach resident."*

!

5 H!<!%3!- !. 1!3-C ( - . 3% ( !./ ( !01. ( +. 3% !\*1) !./ ( !- %6 ( !3- . %833A!% !./ ( !=D\ 5 !24 ( !. 1!1)6 ( ) !4- %7 ( !  
35 0% .- !3, '423+7!%01+2#

### 3.8-4: Hazards and Hazardous Materials:

DEIR!  
Lane adjacent to BCHD and effects on the BCHD site.

\$/ 3 !5 16 3+74( 8!9%: !; < ( 21+21! = ( % / !5 46 0?!%+2\*3'!10 ( ) % ( 2!\*)16 " LGM. 1! " LQNE24)3+7!R / 3 / !  
. 35 ( !3 !%, ( 0. ( 2!K3 ( . ) E) ( - 3( +. 3% !S!R % . ( #5!9' ( % ( !+1. ( !./ % !3 ( . ) E) ( - 3( +. 3% !Y!R % . ( - !2 ( \*3+ ( 2!

JD2-3 (cont.) &A!/( !-.%2%2-!%!/ %! 35 ( ER/3/!6 ( %&-!3!6 1-!3 ( 'A!&!, 1+- 2( ) ( 2!/%8%214-!R %.( !&A!  
1.12%AY!-.%2%2-#!

**3.8-4J Hazards and Hazardous Materials: DEIR fails!** 1!23, 4--!/( !9DH!% !%!, %!, 3+17( +!R 3/!13!  
3+/%%3+!( ^01-4)( !3+!, 46 4' %3( ! ( ^01-4)( -!)16 !%&81)+( !.1^3+!)16 !, 1+-.)4, .3+!1C( )!/( !Q  
A( %!10( )3!2!%2!/( !/46 %&!/( %./!( \*\* , -.#!

5 H!<!%&-!1!3+, '42( !/( !, %&, ( )-!%-1, 3%( 2!R 3/!9DH!3+/%%3+!( ^01-4)( -!4, /!% !6 4'.3D'( !  
6 A( '16 %& 3+7!1+( !1\*!/( !6 1)( !-( )3!4-!, %&, ( )-!%&2!/( !21, .1);-?R/1!/%C( !%)( %2A!&( +!  
237+1-( 2!R 3/!%&2B1)!0%-( 2!%R %A!R 3/!1\*\*3( -!%!/3!, %6 04-#!

5 H!<!%&-!1!3+, '42( !%&!%&A-3 !1\*!1+7\_ ( )6 ! ( ^01-4)( !.1!9DH!%&2!, 1+- ( @A( +, ( -!1!/46 %&!  
/( %./!% !2( -, )3& 2!8& '1R J!!

[U!+7 .( )6 ! ( ^01-4)( ! ( #!#3+!, 1+\*3+ ( 2!-0% ( -?!, %&!) ( -4'.!3+!+ ( 4)1'173 %!35 0%-.!3+, '423+7!  
35 0%&( 2!, 17+33C( !%&2!6 1.1) !+ ( 4)18&/ %C3!)%!0( ) \*1)6 %&, ( !% !R ( ''!% !%2C( )-( ! ( \*\* , -.!3+!/( !  
: 3+( AE!3C( )E35 6 4+( !-A. ( 6 !%&2!/( 6 %1'173 !-A. ( 6 E!%&2!1+!2( C( '106 ( +. !%&2!)( 0)124, .3+!  
;[ #!#!+C3!1+6 ( +.%!9)1. ( , .3+!V7( +, Alq PH9Vc!FG' Q35!!

**DEIR fails to adequately analyze the human health effects of Benzene!**\*14+2!3+!/( !13-!%&2!  
( \*\* , -.!%&2! fails to conduct a comprehensive human health study!1\*!/( !%&81)+( ! ( \*\* , -.!1\*!/( !  
=( +8( + ( !: +1R +!1!& !R 3/3+!/( !13-!3+!/( !2% %#!

JD2-4

K!+!, 1+.)% .! ( ^01-4)( !.1!9DH!3+!4+, 1+\*3+ ( 2!-0% ( -!0)( - ( +. -!C( )A! 35 3 ( 2!)3: !73C( +!3-!)%03!  
C1'%33%3+!;3! #E( C%01)%3+!1)!230( )-%!3!C%01)!\*1)6 ?!V-!2( -, )3& 2!3+!\*4)./( )!2( .%&8& '1R !  
%&9/( !!!HPV!d!3+, '423+7!13!-%6 0'3+7!%&2!3+211)!%6 &3 +. !%&!@%3A! ( -3+7!d!R %!, 1+24, .( 2!  
%!/( !9)1T, .!3( !.1!2( .( )6 3+!/( ! ( ^ ( +. !1\*9DH!, 1+.%6 3+%3+!%R ( ''!% !/( !01. ( +. 3%!\*)!  
( ^01-4)( !.1!4+-%&!( ! ( C( '-!1\*9DH!R 3/3+!, 1+\*3+ ( 2!-0% ( -!;3! #E&4323+7-?1+!/( !, %6 04-#!K!

5 H!<!%&-!1!, 1+24, .!%&/46 %&/( %./!, 16 0)( / ( +3C( !/( %./!-.42A!1+!/( ! ( \*\* , -.!1\*!6 4'.3D'( !  
( ^01-4)( !.1!/( !, %!, 3+17( +-!14+2!%!/ ( !3( E( 3/( )!3+!13!C%01)-!1)!/( )147/!%&81)+( !  
( ^01-4)( -#!

**3.8.4 DEIR FAILS!** 1! ( ^0' %&+!/( !0)( - ( +, ( !1\*9DH!% !81)3+7-!%)1--!/( !entire!=D\ 5 !P3( #\$/ ( !  
5 H!<!.% ( -!/( !\*)6 ( )!2)A!, '( %&( )-!%!' FxF!a'7'( )!K!3!4-0( , .( 2!1!& !%&-14), ( !1\*!  
. ( .)%/'1)1( . / A( + ( !9DH?!-13!, 1+.%6 3+%3+!%!/ ( !9)1T, .!3( !%&2!/( !+ ( 3/ &1)3+7!0)10( ).3-!  
;D1+C( )-( !D1+-4'.%&-!FGFG?#5!!DEIR fails! 1! ( ^0' %&+!/( !/3/!( C( '-!1\*9DH!\*14+2!%1-13!&1)3+7-!  
%)1--!/( ! ( +.3( !3( #5 H!<!%&-!1!3+C( -.3%( !/)147/!%&, 16 0)( / ( +3C( !)( 01).!8A!R/3/!/( !  
9DH!)%C( ' ( 2!.1!=1)3+7-!D" \_FGE=D" \_XGE=DF \_OE=DF "OE=DF!1, % ( 2!%!.35 ( -!16 ( !QGG!\*.!1)!  
6 1)( !\*)16 !/( !, '( %&( )-!%1+7!%&1./( !-.) ( ( .E!%&2!ef \$!1+!/( !D\ 5!3( #5 H!<!aVIU!1!  
2( .( )6 3+!/( !0)( - ( +, ( !1\*9DH!%&2B1)!1./( !, %!, 3+17( +-!1)!, 1+-34( +. -!1\*, 1+, ( )+!3+!1)3+7-!  
-1!\*%!%R %A!\*16 !/( !%!( 7( 2!, %&-( !1\*!/( !9DH!#!.21( -!+1.!( ( 6 !01--3& ( !/%9DH!.)%C( ' ( 2!1!  
\*%&!)16 !3-Y-14), ( !%!/ ( !2)A!, '( %&( )-#!\*!3!3!1E/( !0'( % ( !0)1C3( ! ( -3+7!1\*!/( !.1/( !)

JD2-4 (cont.) -3(-B.1)(-E/16(-I3!/(I-%(I0)1^3 3A!1I0)1C(!/(I5H<I-%(6(+.-!1\*2)A!,'(%(!),1+.%6 3-%3!+-!%)1--!D\ 5#!

### 3.8.5 Hazards and Hazardous Materials - DEIR States!!

KV\*(!)R/3/I3R%I3-4(2!K,16 0'(.2\_%(!,'1-(2S!2(-37+%3!+!&A!/(!U1!N+7('(-!<g h D=I1+!f ,.1&(!!"EFG"FI;D1+C)(-!D1+-4'.%+.-!FG" L 7\$!<g h D=I23!+1.I3-4(!%2(. )6 3-%3!+!1\*!/(I3(!\*1)!)(-3(+.3%!04)01-(-#!

5H<!\*3-!1I0)1C3(!R/1!6 %2(!/(I2(. )6 3-%3!+!./3!D\ 5!%( %1+I3(!R% !%3!3(!\*1)!/46 %+/ %3%3!+R 3/14.!,1+-(@(+,(!1/46 %+/ (%./#!

D1+C)(-(<(01).!FG"LEO#F!-%(-!KV"!./)((I3(-!%(!,1+-3)(2!(+C3!+6(+.%!,1+, )+-#!  
**Thereafter, the DEIR fails to adequately investigate and has not completed comprehensive human health reports to determine the effects of all three sites on human health##!+!%223 3!+E**  
./(!D1+C)(-(<(01).!FG" L!-%(-!O#F!K01--3(!I3!%2!13!C%01)!3 0%.-S!%2!5H<!\*3-!1!  
%2(@%('A!3C(-.37%( !/(I2(. )6 3-%3!+!/%!/(!,16 0)/(+3C(/ (%./!)(01).!%2!( \*\* ,.-!1+!  
/46 %+/ (%./!1)!)(-3(+.3%!33+7#!

D1+C)(-(<(01).!FG"LEO#F!-%(-!J!KD1+, )+!\*1)!0%.!3 0%.-!\*16 IR('I3-.'%3!+!%2!+(2!  
\*1)!(\_%21+6(+.!1)!\*4.4)(I2(C'106(+.%!( %!,1+, )+#!

**DEIR fails to**,1+24,.!%2(@%(!,16 0)/(+3C(/46 %+/ (%./I3C(-.37%3!+!1I2(. )6 3+(!/(!  
-3(I3!-%(\*1)!/46 %+/ (%./!%2!)(-3(+.3%!33+7#!)(7%2-!1!/(!1)6 (!)R('I3-.'%3!+!%2!  
%21+6(+.#!

JD2-5

**Converse Report Page 63 states!**KV'./147/!Converse was not able to locate any records describing the completed soil-excavation activities and confirmation soil samplingE./(!59g !  
.)%-\*( )(2!/(!,%(!1!/( <g h D=IR/3/I3-4(2!di,%(\_'1-(2i!2(-37+%3!+!\*1)!/(!U[PS!,%(!3!W'A!FG"O#!!  
**DEIR fails to locate the records and to adequately complete a comprehensive investigation!**1I2(. )6 3+(!/(I3(I3!-%(\*1)!/46 %+/ (%./!%2!)(-3(+.3%!33+7#!\$( <g h D=I23!+1.I3-4(!%]-%(\*1)!)(-3(+.3%!33+7!21,46(+.#!

!

**DEIR fails to mitigate the Converse Report reporting of the detection of PCE across the BCHD site in almost every location.**

- ! D1+C)(-(<(01).!-%(-!J!"PCE detected in 29 of the 30 soil-vapor samples at a maximum concentration of 2,290 ug/m<sup>3</sup> in sample BC14-15."
- ! 5H<!\*3-!1I3+,42(!6 37%3!+!6 (%4)(-!1)!9DH!%3&1)+(!,1+.%6 3-%3!+!%2!,46 4'%3C(! \*\* ,.-E(-0(,3%A!1+!,/32)(+!%2!(-+33C(!)(,0.1)-#!
- ! 5H<!\*3-!1I3C(-.37%( !%2!( ^0'%2!R/A!/(!D\ 5!P3(!14+2!/37/!(C'-%)1--!/( !(+.3(!D\ 5!3(!#!

### 3.8-26: Hazards and Hazardous Materials- Soil Contamination

•! KZ )14+2!23.4)&3+7!% .333 -!;( #7#( ^, %C%3+!E.)( +, / 3+7E%+2!7)%23+7!24)3+7!9/%( !" !  
%+2!9/%( !F!R 14'2!23.4)&!9DH, 1+. %6 3+( 2!-13- E&( 73+3+7!R 3/!/( ! ( ^, %C%3+!1\*!/( !  
-4&( ))%+( %! ( C ' -!1\*!/( ! <DaH!=4323+7!1!%2( 0./ !1\*!FQ\*( ( .!24)3+7!9/%( !" #P36 3%!'AE  
7)%23+7!R 3/3+!/( !C% %+. !a'%'( )!U1 !R 14'2!% -! ( +, 14+. ( )!9DH, 1+. %6 3+( 2!-13-#\$/ ( !  
-13!-% 0' ( -!1+!/( !C% %+. !a'%'( )!U1 !;3# #E=D "M%+2!D "Oj! ( \* )! !1a374) ( !X# " ?!/%2!  
./ ( !7) ( %!, 1+, ( +. )% 3+- !1\*!9DH!1+!/( !9)1T, . !-3 ( !;D1+C )-( !D1+-4' .%+.- !FGFGj! ( ( !  
V00( +23!Z ?#54)3+7!9/%( !F! ( ^, %C%3+!1\*!)!/( !-4&( ))%+( %! ( C ' -!1\*!/( !O)101-( 2!  
0%: 3+7!-. )4. .4) ( E- )C3 ( !% ( %E%+2!1./ ( )! ) ( +, / 3+7!%+2!7)%23+7!% .333 -!24)3+7!9/%( !  
F!R 14'2! ( +, 14+. ( )!9DH, 1+. %6 3+( 2!-13-#53.4)&%, ( !1\*!& +8( + ( , 1+. %6 3+( 2!-13!  
14'2!1, , 4)!24)3+7!9/%( !" !R 3/!/( ! ( 6 1C%!1\*!/( ! ( ^3.3+7!+1)./( !+!-4)\*% ( !O%: 3+7!1!  
%+2!-4&- ( @! ( +. ! ( ^, %C%3+!%+2!1+- . )4. .3!+% .333 -!%-1, 3% ( 2!R 3/!/( !O)101-( 2!  
<DaH!=4323+7!53.4)&%, ( !1\*!, /'1)1\*!6 !, 1+, ( +. )% 3+- !, 14'2!1, , 4)!24)3+7!9/%( !F!  
R / ( +!2( 6 1'33!+!1\*!/( ! ( ^3.3+7!O%: 3+7!-. )4. .4) ( !%+2!O1. ( +. 3%'A!/( ! = ( % / !D33 -!  
V2C%+, ( 2!6 %73+7!=4323+7!% !R ( " !% !-4&- ( @! ( +. ! ( ^, %C%3+-E7)%23+7!%+2!1, 1+- . )4. .3!+!  
% .333 -#5!!  
!

**3.8.38 DEIR States:**!KR 3'!R 1): !R 3/!/( !%7( +, 3 -!%+2!1./ ( )!04&3 ! ( +.33 -!1!%22) ( --!/( - ( !  
-% 0'3+7!)( -4' -!%+2!32( +.3%A!/( ! ) ( -O1+- 3'( !O% .A#U1+7. ( )6 !, ' ( % 40!1\*!9DH!&A!  
./ ( ! ) ( -O1+- 3'( !O% .A!R 3'!1, , 4)!% !%4- ( O% ( ! ) ( 6 ( 23%3!+!O)1T, .S!

JD2-5  
(cont.)

5 HI<!%3-!1!%22) ( --!6 33%3!+!& \*!)( !/( !5 HI<!3!%00)1C ( 2#That is NOT mitigation!-3, ( !3!3!  
+1. !3-%3( 2!& \*!)( !, 1+- . )4. .3!+#\$/ ( !DEIR fails to provide the exact methods to do so BEFORE!  
./ ( !, 1+- . )4. .3!+!1\*!./ 3!O)1T, .#!!

V3&1)+( !, 1+. %6 3%3!+!R 3'!1, , 4)!R 3/!/( !-3+33%+. !2373+7!E4+( %). / 3+7!1\*!, 1+. %6 3+( 2!  
-13-#\$/ ( !O)1T, . !R 14'2! ) ( % ( !%4-3+33%+. !/%8%2!1!/( !O4&3 !1)!/( ! ( +C3!+6 ( +. !/ )147/!  
) ( %1+!%&A!1\*!)( - ( ( %& ( !40- ( .!%+2!%, 32( +. !, 1+233!+- !3-C1'C3+7!/( ! ) ( ' ( % ( !1\*!/%8%214-!  
6 % ( )3%-!3-!1!/( ! ( +C3!+6 ( +. #!

\$/ ( !O)1T, . !R 14'2! ( 6 3!/%8%214-! ( 6 3-3!+-!1)!/%+2' ( !/%8%214-!1)!% 4. ( 'A!/%8%214-!  
6 % ( )3%-E-4&- .%+, ( -E1)!R %. ( !R 3/3+!%GF O 6 3( !)%23-!1\*!%+( !^3.3+7!1)!O)101-( 2!-, / 11'!/%!  
R / ( +!%&1)+( !R 3'!/( ! ) ( % ( +!/( !/46 %!/( !%./ !%+2!R ( ' \*% ( !1\*!/( ! ( +.3( !, 16 6 4+3A#!!

k( . !/( !5 HI<!%3-!1!@%+.3%A!/( !23 - ( !%+2!1./ ( )!%&1)+( !, 1+. %6 3%3!+!% !/( !\*14)!-, / 11'-!  
R 3/3+!! !6 3( !1\*!/( ! =D\ 5#!

5 HI<!aVIUP. 1!3+C ( -.37% ( !%+2!6 33% ( !/( !9DH!\*14+2!%)1--!/( ! ( +.3 ( ! =D\ 5#5 HI<!%3-!1!2( %!  
R 3/!/( !3+/%%3!+!1\*!9DH!%, 46 4'%3( ! ( \*\* ( , -!1!-, / 11'-E) ( -32( +. -!%+2!1+-3 ( !O( )-1+-#!

V3&1)+( !O% .3 4' % ( !6 % . ( )!1)!- ( +33( ! ) ( , ( 0.1)-!%+2!PCE AIRBORNE IS A DANGER and is not  
addressed in the DEIR. !

### 3.9 HYDROLOGY AND WATER QUALITY !

X#\_"" !5 Hl<!.%(-J!

K\$/ ( !C% %+. la'%7' ( )!U1 l3 l4+0%C( 2ER / 3 / !%'1R - !.1)6 R % ( )!1l3+\*3.)% ( l3+.1!./ ( !7)14+2#la%3-!  
.1l2( . ( )6 3+ ( !/ 1R !./ ( l3+\*3.)% 3l+!R 14'2!)( % / !QGG!\*( . m%R %A!% !=D!" !%+2 !=D!F !&1)3+7-#!

5 Hl<!%3-!.1!, 1+24, .!%, 16 0)( / ( + - 3( !-.42A1\*!./ ( !R % ( )!%& ( !./ % l3 !./ ( **!top level of  
groundwater#**5 Hl<!%3-!.1!-.42A!(\*, .- !1\*!./ ( !-4)\*% ( !R % ( )!% !%+!( ^01-( 2!0%!.1\*!./ ( !R % ( )!  
.%& ( !%+2!, 1+- @4( +, ( - !1\*!./ ( !0)1T, .!, 1+-.)4, .3l+!E)4+\_1\*\*!%+2!\*4.4)( !4-( !1\*!-3( #!

5 Hl<!%3-!.1!%+%A8( !./ ( !(\*, .- !1\*, 1+-.)4, .3l+!E)4+\_1\*\*!%+2!\*4.4)( !4-( !1\*!=D\ 5 !1+!./ ( !  
, 1+.%6 3+% 3l+!1\*!./ ( !7)14+2R % ( )#!

D4))( +. !7)14+2R % ( )!, 1+.%6 3+%+.-!, 1+- .34( +.- !1\*, 1+, ( )+!%4( !5\$ PE\$DHE9DHE0( ), /'1)%( E  
+3)%( E3!+E6 %7%+(- !%+2!, /'1)3( #5 Hl<!%3-!.1!%+%A8( l3!./ ( !0)1T, .!(\*, .- !1+!./ ( !Z %7( !  
%@43( )!R 3/ !+1)./ ( )+!&14+2%A1\*!./ ( !Z %42( +%4%@43( )!401+!R / 3 / l3 !-3-!%4( !-3+\*3%+.#

5 Hl<!%3-!.1!32( +.3\*A!( \*, .- !1\*!./ ( !0)1T, .!401+!./ ( !Z %7( !%+2B1)!Z %42( +%4%@43( )!1\*!%+AB%!  
)(' ( % ( - !1\*!5\$ PE\$DHE9DHE1)!1./ ( )!, 1+- .34( +.- !1\*, 1+, ( )+!1+!./ ( !%@43( )- !%+2B1)!7)14+2R % ( )!  
%+2!7)14+2R % ( )!R ( "- l3+!./ ( !%4( %B)( 73l+#!

JD2-6

5 Hl<!%3-!.1!32( +.3\*A!./ ( !g ( ''!l5 !n!NFO!MP.% ( !n!MP" Mg G` HGX!"1, % ( 2!%1+7!e 1#9)1-0( , .!  
VC( +4( !%2% ( +. !.1!./ ( !=D\ 5 !P3( #lg % ( )!P4)\*% ( !H( C% 3l+!3+!% ( - !2%4- / 1R - l3 !% !" M# G!\*.#  
%+2!%3-!.1!, 16 0)( / ( + - 3( 'A!%+%A8( !./ ( !(\*, .- !1\*!./ ( !, 1+-.)4, .3l+!E2373+7E%+2!  
, 1+.%6 3+% 3l+!1+!./ ( !g ( ''!%+2!g % ( )!P4)\*% ( !R % ( )- l3+!./ ( !%4( %B)( 73l+!%+2!%+AB%!( \*, .- !1+!  
/46 %+!/( %./ #!

U1\*A!H+73+ ( )3+7!" LLN!( .. ( )!1!<g h D=-.% ( - l3+!./ ( !Z ( 1!\$)% : ( )<( 01).!./ % !./ ( !KZ)14+2R % ( )!  
'( C( '-!& ( + ( % / !./ ( !0)1T, .!-3( !%00( %!1!C%4A!\*)16 !%00)1^3 % ( 'A!\_O!1!" FG!\*( . !> PU\$!g / 3 / !  
\_1+\*3.- !R 3/ !./ ( !5 Hl<!.% ( 6 ( +.- !1+!R % ( )!( C( '-!-% ( !1\*!5 Hl<!& , %4-( !7)14+2R % ( )!R % !+1.!  
( +, 14+.) ( 2!% !%46 %3 46 !&1)3+7!2( 0. / !1\*!Q' #O!\*( . !;5 Hl<!X#\_"" F?!

\$/ ( !U1\*A!H+73+ ( )3+7!" LLN!( .. ( )!%-1!-% ( - !./ % !./ ( !2( . ( , .3l+!3 3- !KR ( ) ( !/ 37/ ( )!./ %+!  
%, ( 0.%& ( !D1+.)% .1)< @43( 2!U(C( '-!;D<5 U?% !./ ( !3 ( #B!!

DEIR fails to include the CRDL detection limits acceptable in 1997 vs. 2021#!Z ( 1!\$)% : ( )J!!

#### ! Sample Analysis

! The following constituents in Table 4 had been detected in 1990 and 1991 in: (a) soil samples during drilling for upgradient and down gradient wells (column one ), (b) in groundwater during conduct of the SWAT monitoring (column two), and (c) were not detected but their detection limits were **higher** than acceptable Contractor Required Detection Levels (CRDL) at the time (column 3).



JD2-6  
(cont.)

K\$/( !D1'46 +X!( C ('-I3, '42( 2 o3+A'D/'1)2( . " F 23 /'1)( ./%( D%&1+ S(. )% /'1)2( =(+8( +( . ^ R % !-. % ( 2!% !\*14+2!3+!U1 \*AlH+73+ ( )3+7!)( 01). #!5 H!<!%B- !.1!3+, '42( !./ ( ! , 1+-. %6 3+%3!+!%+A-3 !3+!./ ( !3+C(-.37%3!+!% !3!( \*\* , .- !\*4.4)( !D\ 5 !/ 46 %+/ ( %./ !4- ( #! 5 H!<!%B- !.1!2( . ( )6 3+ ( B%+A-3 !./ ( ! ( \*\* , .- !1\*!./ ( !%223 3!+%!, %, 3+17( +- !3+.1!./ ( !R % ( )-# 5 H!<!%B- !.1!1, 16 0'( . ( !%, 16 0)( / ( + - 3( ! ( - .3+7!%+2!%+A-3 !1\*!./ ( ! ( \*\* , .- !1+!./ ( !: +1R +! , 1+- .34( +. - !1\*, 1+, ( )+!% !./ ( !D\ 5 !-3 ( E( \*\* , .- !1\*!./ ( !, 1+- .)4, .3!+!%+2!\*4.4)( !4- ( E%+2!+1R +! , %, 3+17( +- !\*14+2!1+!-3 ( !3+.1!./ ( !R % ( )-ER / ( ./ ( )!7)14+2R % ( )!1)R % ( )-!1\*!./ ( ! +3 ( 2!P.%( -# \$12%A!./ ( - ( !, %, 3+17( +- !1+!./ ( !D\ 5 !-3 ( !% ( !9DHE\$DHE=( +8( + ( !1+!-3 ( E%+2!+1!/ 46 %+/ ( %./ ! , 16 0)( / ( + - 3( ! ( - .3+7E%+A-3 E%+2!6 337%3!+!3 !3+, '42( 2!3+!./ ( !5 H!<#!

JD2-7

K\$/( !.1017)%0/ A!1\*!./ ( !9)1T, . !-3 ( !3!)( ' % 3( 'A!%ER 3/ !7( +. ' ( !-'10( - !C%&A3-7!\*)16 ! %00)1^36 % ( 'A! " MQ. 1!" QQ\*( . !> PU%+2!-4) \*% ( !7)%23 +. - !.1!./ ( !+1). / ( % . #\$( / !C% %+. la'%7'( )! '1. !/ % !%+ !%00)1^36 % ( !F" !7)%23 +. !R 3/ !-4) \*% ( ! ( ' C% 3!+- !'103-7! 1R %2- !./ ( ! ( % . ( )+!01). 3!+ !1\*!./ ( !-3 ( #6!!5 H!<!%B- !.1!3+C(-.37% ( !R / A!=DF !&1)3+7!14+2!9DH!-1!\*% !%R %A!\*)16 !, ' ( %+ ( )-#!

JD2-8

K<4+1\*\*\*)16 !./ ( !D\ 5 !, %6 04- !- / ( ( !\*1R - !.1R %2- !./ ( !0( )36 ( . ( )- !1\*!./ ( !, %6 04- !R / ( ) ( !3 !3 ! , 1+C( A( 2! 1!./ ( ! ( ^33+7!6 4+3 30% !- .1)6 R % ( )!2)%2%7( !-A. ( 6 - ER / ( ) ( % ! )4+1\*\*\*)16 !./ ( ! C% %+. la'%7'( )!U1 !3 !3+\*3. )% ( 2!3+.1!./ ( !4+0% C( 2!7)14+2!1)!\*1R - !.1R %2- !./ ( ! ( % . !R / ( ) ( !3 ! 23, / %7( - !.1!, 4)&2)%2- S!DEIR fails!.1!3+C(-.37% ( !./ ( ! ( \*\* , . !1+!./ ( !1, ( %+ !%+2!R % ( ) !R %A- !3- ! ./ ( ! ) ( 73!+#!

!

**DEIR - APPENDIX B** <https://www.bchdfiles.com/docs/hlc/Appendix%20B-HHRA%20and%20CalEEMod%20AQ%20Calculation%20Results.pdf>

## HUMAN HEALTH RISK ASSESSMENT AND CALEEMOD AIR QUALITY CALCULATION RESULTS

\$1jle 3: !> ( 33+7( ) !%+2!5 %&Z 3%eg 112!H+C3)1+6 ( +. !p !+\*)% . )4, .4)( !P1'4. 3!+- E!+, #!

a)16 !U1)%Z )%+1C-: AE3J%, 1!H+C3)1+6 ( +. %EUU

### B-2:

JD2-9

KStudents at the Towers and Beryl Elementary schools were considered, but since these receptors would be located much further away from the property %&2!R 14'2!( ^0( )3+ , ( ! 36 0% . - !6 4, / !1R ( )!./ %+!+ ( %&A!)( - 2( +. 3% !%+2!1+-3 ( ! ) ( , ( 0.1) - Ehealth impacts at these receptors were not quantified#K!

DEIR fails to ensure the human health risks of thousands of school children in the four public schools by NOT quantifying the affects of airborne pollution failing upon them for six years.

## Pollutant Emissions

JD2-10

**B-3: DEIR fails to adequately investigate and create conclusions on human health safety**  
9> !" G! 1!) ( 0' % ( !9> !F#D!H^01-4) ( -J!q S!0% .3 4' % ( !6 % . ( ) !1 \*! " G!6 3 ) 1+- !3+ !236 ( . ( ) !1) !-6 %' ( ) !  
;9> " G? !be used as a surrogate for the TAC DPM!R / ( +!( C%4% 3+7! / ( % . / ! ) 3 : - !% -1, 3% ( 2!R 3 / !  
5 9> !;f H\ \ V!FG" O?S#!

**DEIR FAILS to conduct a comprehensive human health investigation of the health effects upon Sensitive Receptors” in this attempt to conceal the dire consequence of the exposure to Sensitive Receptors:**

K=( , %4- ( !diesel exhaust is the dominant pollutant associated with construction of the proposed Project and diesel emissions from onsite construction emissions would be emitted in closest proximity to receptorsE+1+ 23 - ( '!( 6 3- 31+- !;3#E. 3( !R ( % )E& ) % ( !R ( % )E7% 1'3+ ( !  
( 6 0' 1A( ( !C / 3' ( ! ^ / %4- . ?!%+2!23 - ( '!. ) 4, : ! ( 6 3- 31+- ER / 3 / !R 14'2!1, , 4) !\*4) . / ( ) !\* ) 16 !  
) ( , ( 0.1) - !%+2!R 14'2!8( !-0) ( %2!% ) 1-- !%R 3( !+ ( . R 1) : !1 \*!-4) \*% ( !- . ) ( . - !%+2! / 3 / R %A- ER 14'2!  
/ %C( !%+ ( 7' 33( ! , 1+ . ) 34. 31+ !. 1! / ( % . / ! ) 3 : - Eand therefore were not analyzed in this HRA.”

JD2-11

**DEIR FAILS to conduct an adequate Human Health Risk Assessment for Sensitive Receptors. DEIR is a total failure to ensure the human health risks for children at four local schools.**

Medical journals and studies agree that diesel exhaust pollution significantly effects children’s health with premature deaths, asthma attacks, underdeveloped lungs. Etc.

DEIR fails to complete the comprehensive studies of this project on sensitive receptors and fails to quantify diesel emissions in the schools in proximity to the BCHD.

[http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/school\\_guidance.pdf](http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/school_guidance.pdf)

**Pollutants of Concern/AQMD:**

K5 3 - ( ' !0% .3 4' % ( !6 % . ( ) !3 !. / ( !. 1^3 !% ) !, 1+ . %6 3+ % . !1 \*!0) 35 %A!, 1+ , ( ) + !3 !. / ( !South Coast Air Basin!; PDV= ?#V223 31+ %' AE4+2 ( ) <4' ( !XG" E. / ( !PDVh > 5 !. % ( - !3+ C( +. 1) A!1 \*! . 1^3 ! ( 6 3- 31+- E%+2! % - ( -- ( - !\* ( - !8% ( 2!1+ !. / ( ! ( 6 3- 31+- !1 \*!FX\ \ V9- JS!

<http://www.rampasthma.org/uploads/RAMPasthmaDieselWeb.pdf>

JD2-12

KXEOGG!0) ( 6 %4) ( !2 ( % / - ! ( % / !A( % ) !% !R ( ' ' !% !. / 14- %+2- !1 \*! / 1-03 % !%26 3- 31+- E% . / 6 %d% . % : - ! %+2!1. / ( ) ! ( -03 %1) A!- A6 0.16 - E%+2!1- . !R 1) : 2% A- !!

D/ 32) ( +! ( ^01- ( 2! . 1! / 3 / ! ( C ( ' - !1 \*!23 - ( ' !01" 4. %+ . - !% ( ! \*3C ( !. 35 ( - !6 1) ( !3 ( ' A! . / %+ !1. / ( ) !  
 , / 32) ( +! . 1! / %C( !4+2 ( ) 2 ( C ( ' !0 ( 2! 4+7- # " " S! !

<https://www.epa.gov/dera/learn-about-impacts-diesel-exhaust-and-diesel-emissions-reduction-act-dera>

**“Human Health!**!H^01-4)( !.1!23 - ( '!( ^/%4-.!, %&!( %2!.1!-( )3!4-!/( %. /!, 1+233!+-!3 ( !%./ 6 %d %&2!)( -03%1)A!3'+( --( -!%&2!, %&!R 1)-( +!( ^3.3+7!/( %q. !%&2!'4+7!23 ( %( E(-0(, 3%'A!3+!, /32)( +! %&2!./ ( ( '2( )'A#5!!

JD2-12  
(cont.)

!  
/...0-JBBR R R #/( 74%23%# 16 B(+C31+6 (+.BFG" `B+1CB"MB23 -(' 01"4.3!+ -.4+.- ,/32)( +- '4+7 7)1R./ '1+21+ -.42A-/1R-!

K91"4.3!+!\*16 !23 - ( '!( /3'( -!3!-.4+.3+7!/( !7)1R./ !1\*, /32)( +Y!4+7-E'(%C3+7!/( 6 !2%6 %7( 2! \*1)!3( E%46 %1)!-.42A!/% !\*14+2#5!

!

**(Prepared for Joan Davidson)**

### **3.11 NOISE**

Due to the complexity of the Project configuration, a three-dimensional (3D) airborne noise analysis should be done to completely assess the impact of Project generated noise on the neighboring residential properties. The Project noise environment cannot be adequately analyzed nor be accurately assessed using standard and commonly used engineering methods for noise assessment as presented in the Project DEIR. I recommend that an acoustical physicist perform a 1/3-octave band 3D acoustical analysis of the proposed BCHD Project using 3D SoundPLAN. I also recommend that the responsible party contact Hans Forschner at NavCon Engineering in Fullerton, CA to perform this analysis. The 3D analysis will more accurately assess the impact of the proposed Project on the ambient noise level in the existing residential areas that surround the Project Site.

Currently, the best available 3D model is SoundPLAN, the international standard, which was one of the very first noise modeling software packages on the market available beginning in 1986. It has become a very popular 3D noise assessment model worldwide. The primary use for SoundPLAN is the prediction of noise in the environment.

JD2-13

Noise emitted by various sources propagates and disperses over a given (complex) terrain in accordance to the laws of physics. Worldwide, many governments and engineering associations felt the need to create a 3D model based on the principles of acoustics so that different engineers assessing the same scenario would get reasonably similar answers.

When the first standards were introduced, computers were not available for everyday noise calculations, so the equations were simplified for hand calculations. Some of these standards, designed 30 years ago, are still in use today. Over time, generations of researchers have measured noise and developed different interpretations of cause and effect, so the equations are becoming more complex to better represent the complex nature of sound propagation in the environment.

The calculations have become so complicated and time consuming that the use of computers is paramount and absolutely required. Hand calculations and rough estimates with spreadsheets containing endless tables of data are a thing of the past and have questionable accuracy in many complex environmental applications. Because of this problem the old approach can generate predictions that can cause the planning engineer to arrive at the wrong conclusions.

SoundPLAN software solves complex problems automatically to free the consulting engineers mind so he can solve the creative part of noise planning. It was developed by a team of engineers, geographers, physicists and computer science specialists at SoundPLAN GmbH in Backnang, Germany which is an engineering company primarily focused on noise control and

software development. SoundPLAN treats the full 3D physics of sound propagation and includes treatments for edge diffraction, surface reflection, and surface absorption effects and then makes high-resolution 1/3-octave band noise propagation predictions. Trusting routine tasks to the software allows one to concentrate on a plan and efficiently enables one to present their findings to municipalities, environmental administrations, and private and government bodies from research to planning.

The end-products of the high-resolution 1/3-octave band 3D SoundPLAN noise propagation predictions are detailed noise intensity contour maps that provide the reviewer and city planners with easily assimilated graphically presented noise content. This provides the reviewer with a comprehensive pictorial view of the effects of noise propagation on sensitive receptors generated by large projects during construction and during operation after completion. For this Project, in particular, it will show the effect of disturbing noise on neighboring residential, commercial, and community properties.

The roadway traffic noise predictions are made by the Federal Highway Administration Traffic Noise Model (FHWA TNM) version 2.5. which is built into SoundPLAN.

SoundPLAN should utilize a physical (geometric) description of major neighboring roadways and those neighboring roadways that Project vehicles will use. Vehicular traffic on these roadways is the primary continuous ambient (exterior) noise source for this Property.

JD2-13  
(cont.)

Hourly traffic counts measured by the City of Torrance and the City of Redondo Beach for these roadways should be used in the analysis.

The developer should clearly identify the excavation and construction equipment that will be used including and their typical sound levels (dBA) 50 feet from the source: air compressors, backhoes, compactors, concrete mixers, concrete pumps, concrete vibrators, mobile cranes, bulldozers, generators, grader, impact wrenches, jack-hammers, loaders, pavers, pneumatic tools, pumps, rollers, saws, trucks, etc. Identify the sources of the data documented.

Also, carefully estimate the number of truckloads (and truck weights) of soil and other heavy materials that will be transported to and from the Project Site using the neighboring roadways.

A 1/3-octave band 3D environmental noise propagation analysis is also required for the completed Project since it has the following features:

- 1.! Immense Project size and scale --- large buildings having many large noise reflecting surfaces
- 2.! Multiple traffic corridors between buildings --- noise channeling between buildings
- 3.! Noise diffraction (bending) around building's vertical and horizontal edges
- 4.! Project's physical complexity --- very high large irregularly shaped buildings
- 5.! Multi-level parking structure with many noise radiation perimeter openings and reverberant interior surfaces
- 6.! Complex distribution of many potential onsite disturbing noise sources including many rooftop HVAC units that might require noise barriers

## 7.1 Frequent ambulance activity

The surrounding communities could respond depending upon the extent to which Project generated noise exceeds the ambient sound level. Typical response is described in the textbook "Engineering Noise Control --- Theory and Practice", 2<sup>nd</sup> Edition, by D.A. Bias and C.H. Hansen, E & FN Spon Publishers, 1996:

**"Estimated public reaction to noise when the adjusted measured noise level exceeds the acceptable noise level:**

<b>Excess Noise Level Above Acceptable, dBA</b>	<b>Public Reaction</b>	<b>Expression of Public Reactions in a Residential Situation</b>
<b>0 – 5</b>	<b>Marginal</b>	<b>From no observed reaction to sporadic complaints</b>
<b>5 – 10</b>	<b>Little</b>	<b>From sporadic complaints to widespread complaints</b>
<b>10 – 15</b>	<b>Medium</b>	<b>From sporadic and widespread complaints to threats of community action</b>
<b>15 – 20</b>	<b>Strong</b>	<b>From widespread complaints to threats of community action</b>
<b>20 – 25</b>	<b>Very strong</b>	<b>From threats of community action to vigorous community action</b>
<b>25 and over</b>	<b>Extreme</b>	<b>Immediate direct community and personal action"</b>

The 'acceptable noise' in this discussion can be considered to be the 'ambient traffic noise'. These guidelines provide an estimate of public reaction to noise exceeding the background acceptable level which in this case is assumed to be the ambient noise level.

It is very important to thoroughly investigate the propagation and impact of airborne and ground-transmitted noise from the proposed Project during excavation and construction on the surrounding community. It should also be followed by a thorough investigation of the impact of airborne noise generated by the completed Project on the surrounding community.

Sincerely,

Dave Brent, Acoustical Consultant, INCE

Reliant Environmental Acoustics, LLC

3614 Eleda Drive

Torrance, CA 90505

310-375-5546

**BCHD Healthy Living Campus Master Plan  
State Clearinghouse No. 2019060258  
DEIR Comments**


**Appendix B**

“• **Terrain Elevation** - T<sup>+</sup>e Úkoḡ t s te s lo ateo ō a small + ll. De<sub>2</sub> ē ō ḡ ō t<sup>+</sup>e lo at ō , t<sup>+</sup>e ō ffekeḡ e ~ elevat ō etŌeeḡ t<sup>+</sup>e Úkoḡ t s te aḡ ō sukkoḡ ō ḡ ke e<sub>2</sub> toks vakēs fkom 30 to 100 feet. ! " # \$ D ke ommeḡ ō s t<sup>+</sup>at f all ke e<sub>2</sub> tok elevat ō s ake loŌekt<sup>+</sup>aḡ t<sup>+</sup>e ase elevat ō of t<sup>+</sup>e souk e, ō s<sub>2</sub> e<sub>2</sub> ō mo<sub>2</sub>el ḡ s<sup>+</sup>oul ō assume t<sup>+</sup>e ō -ŋefault, flat tekkaḡ ō t ō . Ūek ! " # \$ D% ō sekvat ve gu ōā e, all souk es aḡ ō ke e<sub>2</sub> toks Ōeke mo<sub>2</sub>ele<sub>2</sub>at &eko elevat ō .' ”

- **DEIR failed to use the AERMAP (below) for terrain data preprocessor.** T<sup>+</sup>e tekkaḡ s vek( ō ffekeḡ t Ō t<sup>+</sup> sē s t ve ke e<sub>2</sub> toks lo ateo ~ sevekal ō ke t ō s aḡ ō tekkaḡ s sukkoḡ ō ḡ t<sup>+</sup>e ) ! \* D<sub>2</sub> kono ~ ḡ ō ffekeḡ t out omes. " # \$ D ke+u kes , Nearby terrain and elevation considerations, such as elevation data sets and the resolution used, coordinate system, datum, complex terrain, etc.” **DEIR failed to do so.**

JD2-16

**AQMD: “Elevations**

T<sup>+</sup>e "- . \$ / D mo<sub>2</sub>el ḡ s(stem ~ luno<sub>2</sub> " - . \$ " Ū  , Ō<sup>+</sup> + s a tekkaḡ ō ata<sub>2</sub> ko essok. Tekkaḡ ō ata, ava la<sub>2</sub>le fkom t<sup>+</sup>e Ō<sup>+</sup> te<sub>2</sub> tates 1eolog al ukve( 20 1 3 s use<sub>2</sub> ( "- . \$ " Ū to<sub>2</sub> kono e tekkaḡ ase elevat ō s fo<sub>2</sub>ea + ke e<sub>2</sub> tokaḡ ō souk e aḡ ō a + ll<sup>+</sup>e ḡ t s ale value fo<sub>2</sub>ea + ke e<sub>2</sub> tok "- . \$ " Ū must<sub>2</sub>e use<sub>2</sub>to ŋevelo<sub>2</sub> t<sup>+</sup>e tekkaḡ ō ata ke+u ke<sub>2</sub> fōk "- . \$ / D.' ”

- **“Meteorology** - T<sup>+</sup>e \* aŌt<sup>+</sup>o<sub>2</sub> e " k<sub>2</sub> o<sub>2</sub>kt, ! al fo<sub>2</sub> a meteokolog al ŋataset 2 tat ō 4D 31563Ōas use<sub>2</sub> ō s<sub>2</sub> e<sub>2</sub> ō mo<sub>2</sub>el ḡ . T<sup>+</sup>e ŋataset Ōas<sub>2</sub> ko essen aḡ ō ke<sub>2</sub> ake<sub>2</sub> ( t<sup>+</sup>e ! " # \$ D 2 ! " # \$ D 70703aḡ ō a<sub>2</sub> tukes lo al &eo Ō<sup>+</sup> ō atte<sub>2</sub> s. 8 guke 1 s<sup>+</sup>oŌs t<sup>+</sup>e Ō<sup>+</sup> ō kose ŋ agkam fo<sub>2</sub>kt<sup>+</sup>e \* aŌt<sup>+</sup>o<sub>2</sub> e meteokolog al stat ō s<sup>+</sup>oŌ ḡ t<sup>+</sup>at Ōest aḡ ŋ Ōest-sout<sup>+</sup> Ōest Ō<sup>+</sup> ō s<sub>2</sub> keva l ~ t<sup>+</sup>e keḡ ō . T<sup>+</sup>e most ke ē t 9 (eak<sub>2</sub> of ava la<sub>2</sub>le meteokolog al ŋata Ōeke mo<sub>2</sub>ele<sub>2</sub>at 2.e., 7017 t<sup>+</sup>koug<sup>+</sup> 70153' ”

**DEIR fails to use a meteorological station within 2019-2021, using instead 2012-2016 which fails to identify valid wind conditions. High winds within that time were not included in the DEIR. And Hawthorne Airport station does not best represent the high winds at BCHD.**

JD2-17

**AQMD:** “The meteorological station that best represents the facility’s meteorological conditions (such as prevailing winds), terrain, and surrounding land use should be used in all modeling analyses. This means that the closest meteorological station to the facility is not always the most representative meteorologically.

All technical justification used in choosing the appropriate meteorological station for dispersion modeling and health risk assessments should be included in the report submitted with the analysis and all electronic modeling files.”



## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 11:40 AM  
**To:** Meisinger, Nick  
**Subject:** Fw: Oppose BCHD project

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

From: R Crisa <dr\_cr@msn.com>  
Sent: Wednesday, March 24, 2021 5:13 PM  
To: Communications <Communications@bchd.org>  
Subject: Oppose BCHD project

JHRC-1

We oppose the massive BCHD project for many reasons, such as.....it will expose thousands of residents of Redondo Beach, Torrance & surrounding areas, the public, a nearby schools to 5 active years of demolition & construction, cancer-causing pollution, constant noise levels, & daily disruption for neighborhoods. Also,surrounding major thuroghfares such as 190th St and Prospect Ave will be disrupted and severely damaged by constant heavily loaded trucks.

We stand opposed to the project.  
Josephine Hrzina & Richard Crisa.  
Redondo Beach homeowners

Sent from my iPhone

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:50 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Comments to the BCHD DEIR

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**From:** Josey Vanderpas <jrvvanderpas@gmail.com>  
**Sent:** Wednesday, June 9, 2021 10:22 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Public Comments to the BCHD DEIR

JV-1 I am in opposition of this development. The constant noise this project will create would be harmful to residents, those  
JV-2 of us who suffer from tinnitus would have an increase in our tinnitus and create unbearable discomfort resulting in  
anxiety. Another concern I have the excavation would raise dust and hazards material for all to breathe. Again creating  
serious health problems. The idea of 5yr. Construction with these issues is unconscionable.  
Josey Vanderpas Torrance resident

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:34 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: NO to your Assisted living facility project

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**From:** Joyce Choi <jchoi021978@gmail.com>  
**Sent:** Sunday, June 6, 2021 4:50 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** NO to your Assisted living facility project

JC-1 | Hi, I am a resident of the Pacific South Bay neighborhood. I'm opposed to your proposal to build the assisted living facility and don't agree with the environmental impact report nor your proposed timing of the project. Dust, pollution and trucks to haul away debris and bring your construction materials (excluding your construction staff vehicles????), will plague our streets of additional truck noise, congestion and toxic fumes! I have a child at Towers. What will you do if an agent you failed to consider brings terminal illness or permanent complications to any one of my family members?

Do not build your structure.

Thank you!  
Joyce Choi

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 2:02 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Comments to BCHD DEIR

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**From:** Joyce Stauffer <jostauffer@verizon.net>  
**Sent:** Thursday, May 27, 2021 7:21 AM  
**To:** EIR <eir@bchd.org>  
**Cc:** cityclerk@redondo.org <cityclerk@redondo.org>; cityclerk@torranceca.gov <cityclerk@torranceca.gov>; citycouncil@hermosabeach.gov <citycouncil@hermosabeach.gov>; cityclerk@citymb.info <cityclerk@citymb.info>; skeller@rbusd.org <skeller@rbusd.org>; superintendent@tusd.org <superintendent@tusd.org>; stowe.tim@tusd.org <stowe.tim@tusd.org>; rbpta@rbusd.org <rbpta@rbusd.org>; torranceptas@gmail.com <torranceptas@gmail.com>; Communications <Communications@bchd.org>; pnovak@lalafco.org <pnovak@lalafco.org>  
**Subject:** Public Comments to BCHD DEIR

As long-time residents of Torrance, we strongly oppose the massive plans to redevelop the South Bay Hospital site for the following reasons:

5+ years of construction = PERMANENT damage to our community and quality of life.

MASSIVE

*CLEARLY INCOMPATIBLE WITH SURROUNDING NEIGHBORHOODS*

- BCHD proposed buildings are wholly incompatible with the surrounding neighborhoods, and disruptive for the location. Completed construction is 300% larger than currently exists.
  - Though BCHD claims the revised version of the campus is "smaller" the Phase 1 design is actually TALLER (6 stories vs. 4 and 103 ft. tall vs. 60 ft.
  - The massive luxury Assisted Living Facility (RCFE) would be the TALLEST building in all three of the beach cities (save two condos built in the early 1970s in Redondo Beach). It's on a HIGHLY visible elevated site rising 30 ft. above street level. The massive facility is 103 ft. tall and sits 133.5 ft. above homes.
- The proposed 6-story, city blocks-long assisted living building and 8-story parking garage will block views, reduce sunlight, cast long shadows and impact the privacy of surrounding homes in all directions.
- The 11-acre construction site sits on a bluff, 30 ft. above street level, and another 30 ft. above homes to the east.

NOISE CANNOT BE MITIGATED

- Per the DEIR: CONSTRUCTION NOISE CANNOT BE MITIGATED – EXCEEDS Federal Transit Administration (FTA) THRESHOLD for the entire 5+ years of construction. Impact is Significant.
  - "The construction noise levels would **exceed Federal Transit Administration (FTA) thresholds and this impact would remain significant and unavoidable** during both Phase 1 and Phase 2 of the proposed Project.

- From the DEIR: "Construction-related noise would be significant. Construction activities associated with proposed Project... would result in a temporary, but prolonged increase in noise levels at the following noise-sensitive residential areas:
  3. Beryl Street between North Prospect and Flagler Lane
  4. Flagler Lane and Flagler Alley between Beryl Street and North Prospect Avenue
  5. Diamond Street between Flagler Alley and North Prospect Avenue
  6. North Prospect Avenue between Diamond Street and Beryl Street."

- More than 60 hours of construction per week. 6 days a week of construction; (7:30 a.m. to 6:00 p.m. Monday through Friday; and 9:00 a.m. to 5:00 p.m. on Saturdays)

#### TRAFFIC

- Increased traffic, congestion and safety issues will overwhelm nearby neighborhood streets with nearly **10,000 heavy haul trips** planned during construction, not counting worker trips.
- **Heavy haul truck route** - Hawthorne Blvd in Torrance to Del Amo Blvd to N. Prospect on to the site past homes and West High School. Heavy haul truck egress is from Flagler site to Beryl, directly behind Towers Elementary to 190th; directly on busy school drop-off and pick-up zone.
- All major surrounding thoroughfares and intersections in the cities of Redondo Beach and Torrance will be impacted.

#### HAZARDS

- The proposed project will expose thousands of residents, the public, and nearby schools to a minimum of 5 ACTIVE years of demolition and construction, hazardous cancer-causing pollutants, noise, vibration, and daily disruptions.
  - Towers Elementary school with 600+ school children aged 4-10, teachers and staff is located just 350 ft. downwind from the demolition and construction site
  - Beryl Heights Elementary school with 450+ school children is ~900 ft. away
  - Redondo Union and West High schools with over 5,000 students combined are 0.3 and 0.7 miles away.
- Hazardous VOCs (volatile organic compounds) and carcinogens were found on the site. According to the [Phase II Environmental Assessment Report](#) by Converse Consultants dated 2/26/20. PCE (perchloroethylene) was detected in 29 of 30 samples, with findings of levels in amounts up to 150 times the allowable residential screening level.

## POOR USE OF TAXPAYER FUNDS

- **The BCHD project would be the ONLY neighborhood incompatible use of a P-CF zoned site in Redondo Beach.** All other 6 P-CF zoned parcels besides BCHD are 2 stories or less: Andrews Park, North Branch Library, Grant Fire Station, Broadway Fire Station, Beryl Maintenance Yard/Police Range, etc.
- Land zoned P-CF should not be used for private developers. RCFEs are commercial enterprises that belong in commercial/residential zones.
- The public health district has strayed far beyond its mission, now planning to "gift" public land in a very long-term lease (likely ~50 to 100-years) to private developers for it's massive \$374M assisted living project.
- BCHD plans a 20/80 business partnership where they retain only 20% interest.
- BCHD is using \$7.6M of taxpayer money for HLC Pre-development planning

- JS3-7 • According to the Market Feasibility Study performed by their consultants MDS
  - 80% of target renters are from outside the Beach Cities
  - Only 9% of the target renters live in Redondo Beach,
- JS3-8 • Redondo Beach public services such as Fire Department/Paramedics will be excessively taxed with the 24/7 operation of the proposed 325-bed assisted living and 400+ PACE program.
- JS3-9 • BCHD refuses to take responsible actions that any public entity is required to do - live within their means and reduce expenses when necessary
- JS3-10 • South Bay Hospital - the only construction ever voter-approved on the site, was sized exclusively for the Beach Cities.

#### BCHD - MISSION CREEP and NON-TRANSPARENCY

- JS3-11 • BCHD is the BOTH the Lead Agency and Certifier/Approver of its own EIR. They can cite “overriding considerations” to un-mitigatable hazards, which are already included in a budgeted line item in BCHD EIR financials.
- JS3-12 • Rather than going for a public vote for a bond to finance a retrofit of the building, as is common for public agencies, BCHD has chosen to avoid going to the taxpayer/owners and chose "development" over this option, as Bakaly stated in the Dec. 2020 Board meeting.
- JS3-13 • BCHD's perceived "moneymaker" - the massive luxury RCFE is built in Phase 1. Phase 2 is the "Community" portion of the project is not funded.
- JS3-13 • BCHD's seismic consultants clearly stated that there is no legal obligation to retrofit the 514 hospital building and that it can likely be used until 2040. Ultimately, retrofitting and remodeling the building is clearly a responsible choice.

Joyce & John Stauffer  
 19411 Linda Drive  
 Torrance, CA 90503

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:53 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: YOUR OUTRAGEOUS AND FLAWED PROPOSAL TO BUILD THE UGLY BUILDING ON PUBLIC LAND

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** beachjazz14@aol.com <beachjazz14@aol.com>  
**Sent:** Thursday, June 10, 2021 2:07 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** YOUR OUTRAGEOUS AND FLAWED PROPOSAL TO BUILD THE UGLY BUILDING ON PUBLIC LAND

As a voter and long resident of Redondo Beach of 19 years, I find it shocking that you think you can bamboozled "the people" with your outrageous, flawed plan.

JB2-1 Your ugly high rise that will house people at a monthly fee of at least \$12,500 will exclude the local residents for assisted living. If you really cared about the locals, you would listen to their ideas, their input, and objections. It is hard to believe you are a "LOCAL" that cares about the common folk,

JB2-2 Your aesthetics, air emissions, noise, recreation and traffic impacts are significant. Can you imagine what the people living in the condos, homes, and school will have to go through? No, of course not, Tom. You are hoping to get another salary increase, Everyone knows the scam you pulled with the DEIR, how it was defective, and must be fixed. The public and voters need input. One of my neighbors suggested you hand your palm out since you refuse to be civil and to listen to the locals.

Disgusted with you and your horrible plan. IT MUST BE STOPPED!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!11

Judith Bunch



**Navarro, Ashlyn**

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:49 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Comments to the BCHD DEIR

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**From:** Judith Scott <jscott006@socal.rr.com>  
**Sent:** Wednesday, June 9, 2021 4:49 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Public Comments to the BCHD DEIR

Dear Reader,

JS4-1

I am a 40-year Torrance resident and am very concerned about the proposed Beach Cities Health District Healthy Living Campus construction project. The current DEIR is deficient in numerous ways. The project is based on outdated assumptions (pre-COVID) about the profitability of its planned for-profit assisted living facility. Such an investment will put at risk the financial health of community programs that BCHD currently provides.

JS4-2

Furthermore, the enormity of the campus plan totally rides roughshod over the surrounding neighboring communities in terms of aesthetics and expected heavy truck traffic, as well as fugitive dust and noise pollution during the lengthy construction period. The DEIR needs to be re-drafted to take adequate account of the extensive community concerns.

Your truly,

Judith Scott  
19510 Linda Drive  
Torrance, CA 90503

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:25 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD

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**From:** Judith Kamp <judith.k.kamp@gmail.com>  
**Sent:** Wednesday, June 2, 2021 5:20 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** BCHD

JK-1 | Please do not pass the new development BCHD is proposing in Redondo Beach! It is unnecessary and a waste of taxpayer money. It will also cause physical harm to people living in the surrounding area and traffic congestion there.

Thank you,  
Judy Kamp

Sent from my iPhone

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:52 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Comments on DEIR  
**Attachments:** BCHD HLC does not meet objectives.pdf; DEIRComments.pdf; Comments of Cain Bros.pdf; BCHD does not meet project pillars.pdf

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**From:** Kenneth Yano <ksyano@verizon.net>  
**Sent:** Thursday, June 10, 2021 1:06 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Comments on DEIR

Please find enclosed four documents commenting on the DEIR.

Ken Yano  
Torrance

## **Why doesn't the proposed Project does not meet the six general objective outlined in the DEIR?**

The DEIR for the BCHD Healthy Living Campus (HLC) states that the proposed project must meet six general objectives developed by BCHD. One of these objectives is:

“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.” (page ES-3 of DEIR)

The interpretation of this objective is that the proposed project should generate the revenue currently generated by Building 514, the former South Bay Hospital. Since any alternatives considered must meet this objective to be considered so should the proposed project, the HLC. In fact, alternatives have been dismissed in the DEIR because they did not meet this objective. So the question becomes:

### **Does the proposed plan for the HLC meet the objective?**

BCHD has never shown any financial plan to verify that the proposal meets the revenue requirement. So this poses another question:

### **Shouldn't BCHD present a detailed financial assessment of the HLC to assure it meets the revenue objective?**

KY1-1

The answers to these questions must be presented before the DEIR is approved. If the HLC does not meet the revenue objective, it should be dismissed immediately.

We will show in the following discussion that the proposed HLC does not meet this revenue objective and should be eliminated.

The income from Building 514, after subtracting expenses, is roughly \$2M per year. To get this return from the HLC, the Joint Venture must make \$10M after taxes, since the BCHD portion of profits is 20%. Since the JV is a commercial venture subject to state and federal taxes, taxes of about \$3M must be paid. This means the HLC must generate a before-tax profit of \$13M.

What must HLC earn to generate a profit of \$13M? Under generally accepted accounting principles (GAAP) that a commercial enterprise must follow, interest, depreciation, and amortization must also be subtracted from earnings to get profit.

Interest of the loan (stated in the Cain Brothers Financial Analysis of the HLC) is about \$7M per year. Depreciation, based on a \$230M building cost and a 39-year straight-line method gives a value of about \$6M per year. If we add these to the profit before taxes, we get a value of earnings before interest, taxes, depreciation, and amortization (EBITDA) of \$26M.

EBIDTA is the difference between total sales and cost of sales. Cain Brothers, in their presentation, claimed that the cost of sales for assisted-living operations historically ran about two-thirds of sales. Applying this ratio of sales and cost of sales gives a sales requirement of \$78M per year. This is the amount of gross revenue that the HLC must take in each year to meet the objective of replacing Building 514 income.

So to achieve the \$10M after-tax JV profit to replace the Building 514 profit, the HLC must receive roughly \$78M in patient revenue (gross income). What does this mean? There are 60 memory care units with two patients per unit, and 160 assisted-living units with one patient per unit. This gives a total patient load of 280. If we assume that each patient pays the same, we get that each patient must pay about \$280K per year, or \$23K per month.

The proposed rate structure calls for \$10K per month for memory-care patients and about \$12K per month for assisted-living patients. At 100 percent occupancy, this only gives \$37M per year. So this scenario does not come close to meeting the objective of replacing the Building 514 income.

**HLC does not replace the revenue from Building 514 and therefore does not meet the revenue objective**

Based on the statement in the DEIR that an alternative that does not meet the stated objectives should be dismissed, the proposed HLC must be dismissed.

To verify our conclusion, we can work the problem in reverse. In this example, we start with gross income per year of \$37M based on 100 percent occupancy with the proposed patient rates. Using the ratio of cost of sales to sales of two thirds, we get EBITDA of \$12.3M. After subtracting interest (\$7M) and depreciation (\$6M), we get a net loss of \$0.7M for the operation. This verifies that the proposed HLC does not meet the general objective of replacing the income from Building 514.

**According to the DEIR, HLC does not meet the general objectives put forth by BCHD and must be dismissed as an alternative**

KY1-2

## PM2.5

KY1-3

During the project is the density of PM2.5 particles being measured at the job site and in the surrounding community? In particular, sites such as Sunnyglen Park, Dominguez Park, and Towers Elementary School need to be monitored as these particles are deleterious to the health of all people, but particularly deleterious to youngsters. Can you provide a map of all locations that will monitor PM2.5 during construction?

If excessive levels of PM2.5 are generated during construction, what is the proposed remedy? Will construction be stopped until the source is identified and a remedy implemented?

Will there be a way for the public to monitor these levels (through the internet, for example) in real time?

## Shade

KY1-4

The description of the shade cast by the building is vague and qualitative in the DEIR. For example, it seems unreasonable that the building will not cast shade until 4 pm in the winter when sunset is around 4:45 pm. Are you providing topographic-contour shade maps for the surrounding area for the following dates: February 4, March 21, May 6, June 21, and Dec 21? These maps need to show the edge of the shadow at ground level for hours of the day that the shadow infringes on residential property near the proposed building and will verify the shade impingement times.

Will the construction contractor provide a frame outlining the proposed building prior to construction? This is required in Torrance for any hillside property and houses on Tomlee Avenue are considered hillside property.

## Noise

KY1-5

How will noise be measured at the job site? Will there be noise-monitoring systems in the surrounding neighborhoods? If so where? If not, why not? Will these measurements be available for real-time monitoring so that noise levels that exceed safe levels can be stopped immediately? Who will be available to register noise complaints from the neighborhood? How will you assure that timely response is made to complaints?

Excessive noise over prolonged periods has been shown to increase stress levels and blood pressure of people subjected to this noise. Will anything be done to mitigate the problem for the people who have these health issues? How will the

noise levels affect the residents of Silverado memory care that is located at the job site?

KY1-5  
(cont.)

What are the expected levels of noise generation by the equipment used on the site? Please include all pieces of machinery capable of generating over 70 dB of noise, their expected frequency of use, and whether multiple pieces will be in use simultaneously.

Since you don't expect to provide a sound suppression wall that is much more than 20 ft high, how will the noise made at higher elevations be suppressed?

## **Traffic**

KY1-6

It appears that all construction traffic will leave the job site and travel down Beryl Street to 190<sup>th</sup> Street. This passes right by Towers Elementary School. Have you considered the traffic congestion at the entrance to Towers Elementary at times of drop-off and pick-up? Have you considered the danger to children exiting and entering cars parked on Beryl by large construction vehicles?

## **Pollution**

KY1-7

The presence of perchloroethane in the ground of the job site is of particular concern. How will you prevent the perchloroethane from being emitted into the air when the construction disturbs the ground? How are you monitoring the levels of hydrocarbon pollutants during construction at the job site? Have you considered what level of hydrocarbon pollutants can leach out of the soil and get trapped in the building (HLC)? What about the trucks that take contaminated soil away from the job site? How are these monitored? Tarps are not hermetic containment and leakage is inevitable. What level of pollution will escape during transit?



## Comments on Cain Brothers “Financial Analysis” of the HLC

KY1-8 In the DEIR, there are no references to either the cost of building the project or the expected revenue. Wood Environmental stated that finances are not a consideration. But in the DEIR, various alternatives are dismissed because they do not meet one of the six objectives. Two of these objectives, however, relate directly to financial impact. It is ironic that the proposed HLC does not meet these two objectives in that it will not provide sufficient profit to fund BCHD projects in the future. In fact, the assisted living and memory care units will not provide any profit for possibly longer than ten years. Thus the finances of the assisted living and memory care units must be considered to determine if this project meets the stated objectives. If they do not, this project needs to be eliminated from consideration as required by the DEIR.

In 2020 BCHD commissioned a financial analysis of the HLC by Cain Bros. Cain concluded that a six-story version of the HLC was profitable and met BCHD objectives, while a five-story was not. But Cain’s analysis contained several significant errors.

### First Error

Cain never calculated the expected profit from HLC, but only presented a cash flow analysis. They neglected the depreciation of the building that must be subtracted from cash flow to get to profit. A building such as proposed can be considered a medical facility with a depreciation basis of 39 years, straight line. Using a value of \$230M for the building gives depreciation of \$5.9M per year. This figure must be subtracted from the net revenues to get to profit. By taking depreciation into account, we will see that the project is not profitable for a number of years.

KY1-9 Figure 1 shows the chart presented on page 9 in “The Healthy Living Campus” on June 16, 2020 by Cain Brothers. The data presented in line 7, labeled “cash flow to equity” in this chart, do not represent profit, as building depreciation is not included. The chart purports to show an Internal Rate of Return of 11.5%. However, this figure is achieved by adding cash flow of \$213.5M to the 10<sup>th</sup> year (labeled “Terminal Value” in line 8). This is presumed to be the sum of the cash flows for an undetermined number of years, certainly not the cash flow only in year 10. If one uses an Excel spreadsheet to calculate the 10-year IRR from the values in the line labeled “cash flow to equity”, the IRR is -1%. This is not a good investment for any potential partner. The addition of the “Terminal Value” of \$213.5M can be considered a fraudulent attempt to put a more positive spin on an investment that is not good.

The real measure of business performance is profitability. Generally accepted accounting principles (GAAP) tell us that profit is derived from net earnings after subtracting interest, depreciation, taxes, and amortization. Since amortization is not applicable and taxes are due only when profits are made, we will just adjust the values from Figure 1 by subtracting building depreciation of \$5.9M per year.

## AL / MC Unit Mix, Financing, and Operations Projections Summary

AL / MC 10-Year Financial Projections and Internal Rate of Return – However, if a JV investor's investment was estimated at 76% of required equity contribution (e.g. \$50.0 Million of \$65.4 Million total for 6-story scenario) for 80% ownership in the JV, then the IRR for the Investor increases to 11.5%.

### Scenario: 6 Story Example Calculation Assuming 80% Ownership

Assumptions											
Revenue Growth <sup>1</sup>	4.00%										
Expense Growth <sup>2</sup>	3.50%										
CapEx Growth <sup>3</sup>	3.50%										
TV EBITDA Multiple	13.0										
	Inception	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
	Construction	Construction	Fill	Stabilized	Stabilized	Stabilized	Stabilized	Stabilized	Stabilized	Stabilized	Stabilized
Total Revenue	0	0	0	32,738,356	34,047,890	35,409,805	36,826,198	38,299,245	39,831,215	41,424,464	43,081,442
Operating Expenses	0	0	0	20,952,548	21,688,887	22,444,893	23,230,464	24,043,530	24,885,054	25,756,031	26,657,492
Operating Income (w/o debt)	0	0	0	11,785,808	12,359,003	12,964,913	13,595,734	14,255,715	14,946,161	15,668,433	16,423,951
Capital Expenditures	0	0	0	(362,272)	(385,651)	(409,499)	(423,832)	(430,666)	(454,019)	(469,910)	(486,357)
Working Capital Line	0	(40,000)	(80,000)	(120,000)	(120,000)	(2,520,000)	0	0	0	0	0
Debt Service	0	0	0	(7,277,367)	(7,277,654)	(7,279,574)	(7,278,934)	(7,279,734)	(7,277,814)	(7,277,174)	(7,277,654)
Cash Flow to Equity	(50,000,000)	(40,000)	(80,000)	4,008,149	4,568,698	2,755,840	5,892,968	6,537,316	7,214,329	7,921,350	8,659,941
Terminal Value											213,511,359
Debt Repayment											(131,792,000)
Total Cash Flow to Equity	(50,000,000)	(40,000)	(80,000)	4,008,149	4,568,698	2,755,840	5,892,968	6,537,316	7,214,329	7,921,350	90,379,300
Equity IRR: 6 Story											11.5%

Scenario	Project IRR	JV Investor IRR @ 80% Ownership	JV Investor IRR @ 75% Ownership
5 Story	9.9%	9.8%	9.0%
6 Story	10.9%	11.5%	10.6%

<sup>1</sup> For Inception through Year 3, annual inflation for Revenues, Expenses, and CapEx growth was assumed to be 3.00%. Inflation escalation as outlined in the Assumptions table begins from Year 3 to Year 4.  
<sup>2</sup> The project will have Revenues and Expenses during the fill period in Year 2 even though these are not reflected in the projections. Operating losses during this period will be covered by the \$3MM Working Capital Line.

**Figure 1. Reproduction of chart presented in “Healthy Living Campus: Evaluation of Development Strategy: Review of MDS Market Study”, page 9, presented by Cain Bros. to BCHD on June 12, 2020. Figure (seventh line) shows “cash flow to equity”, not profit for HLC.**

In Figure 1 note that the sum of the first ten years of cash flow does not exceed the initial cash investment of \$50M. This means that after ten years, the joint venture will not have recovered the initial investment.

Figure 2 shows the effect of depreciation on profit. All the numbers are duplicated from Figure 1, but look different because they are shown in millions of dollars. Subtracting the \$5.9M depreciation from the cash flow leads to the results shown in the line “Net Profit”. Note that profit is negative until year 6. The line below that gives the cumulative profit for the project. This shows a loss until the tenth year. Thus, BCHD would not receive any money from the joint venture until year 10 in this scenario. In that year they could expect to receive about 50K. This is far short of the \$2M income from Building 514 that would be lost starting in year 4. The difference between the Building 514 income and the joint venture is a loss for BCHD over 10 years of \$13.5 M. Note that Figure 2 duplicates the assumptions made by Cain. We will show later that other errors show up that must be corrected.

KY1-9  
(cont.)

	Start	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Yr 6	Yr 7	Yr 8	Yr 9	Yr 10
Total Revenue				32.74	34.05	35.41	36.83	38.30	39.83	41.42	43.08
Oper. Expenses				20.95	21.69	22.44	23.23	24.04	24.88	25.76	26.66
Oper. Income				11.79	12.36	12.97	13.60	14.26	14.95	15.67	16.42
Cap. Expend.				-0.38	-0.40	-0.41	-0.42	-0.44	-0.45	-0.47	-0.49
Working Capital		-0.04	-0.08	-0.12	-0.12	-2.52					
Debt Service				-7.28	-7.28	-7.28	-7.28	-7.28	-7.28	-7.28	-7.28
Cash Flow	-50.00	-0.04	-0.08	4.01	4.57	2.76	5.90	6.54	7.22	7.92	8.66
Bldg Deprec.				-5.90	-5.90	-5.90	-5.90	-5.90	-5.90	-5.90	-5.90
Net Profit		-0.04	-0.08	-1.89	-1.33	-3.14	0.00	0.64	1.32	2.03	2.76
Cum Profit		-0.04	-0.12	-2.01	-3.34	-6.48	-6.48	-5.83	-4.51	-2.49	0.27
10 year IRR=	-1%										

**Figure 2. This is Figure 1 data, but replicated in terms of millions of dollars. “Bldg Deprec”. is shown in the line below “Cash Flow” (8<sup>th</sup> data line). The line shown in Figure 1 labeled “terminal value” is not included. Note that net profit does not turn positive until year 7. All data are the same as in Cain’s chart (figure 1), except for the added depreciation. The 10 year IRR is calculated to be the same as in Figure 1, -1%.**

## Second Error

KY1-10

The scenario outlined by Cain (Figure 1) says that income from the HLC starts in year 3. Furthermore, the income stated in Fig. 1 in year 3 is based on operation at full capacity. We know that the construction of the building is projected to be 29 months. Cain stated in a briefing that full occupancy would not be reached until 22 months after opening, or 51 months after start. So it is unlikely that full income can be achieved in year 3 since the operation does not hit full income until after year 5.

Figure 3 shows a scenario where income in year 4 is reduced to 70% of full income. Income in year 3, which is, at best, a partial year of occupancy, is assumed to be zero, i.e., no income, no loss. Again the project does not return a profit until year 6, but the early losses mean that the project does not realize net profit until about year 12. Note that the 10-year IRR worsens to negative 3 percent. This approximation represents a better attempt at modeling that presented in Figure 1.

KY1-10  
(cont.)

	Start	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Yr 6	Yr 7	Yr 8	Yr 9	Yr 10
Total Rev.					22.92	35.41	36.83	38.30	39.83	41.42	43.08
Oper. Exp.					15.18	22.45	23.23	24.04	24.89	25.76	26.66
Oper. Inc.					7.74	12.97	13.60	14.26	14.95	15.67	16.42
Cap. Exp.					-0.38	-0.40	-0.41	-0.42	-0.44	-0.45	-0.47
Working Cap.		-0.04	-0.08	-0.12	-0.12	-2.52					
Debt Service					-7.28	-7.28	-7.28	-7.28	-7.28	-7.28	-7.28
Cash Flow	-50.00	-0.04	-0.08	-0.50	-0.05	2.76	5.90	6.54	7.22	7.92	9.15
Bldg Depr.				-5.90	-5.90	-5.90	-5.90	-5.90	-5.90	-5.90	-5.90
Net Profit		-0.04	-0.08	-6.40	-5.95	-3.14	0.00	0.64	1.32	2.02	3.25
Cum Profit		-0.04	-0.12	-6.52	-12.47	-15.61	-15.61	-14.97	-13.65	-11.62	-8.37
10 year IRR=	-3%										

**Figure 3. Similar to Fig. 2 but with reduced revenue in years 3 and 4. This represents the 29 month construction schedule and the 22 month build-up to full occupancy. Profitability for the project does not occur until about year 12. The project loses over \$8M over the first ten years. 10-year IRR worsens to -3%. The capital expenditure line is also moved out to account for the later start.**

The ten-year IRR falls to -3%. This makes the investment unattractive to any partner.

### Third Error

KY1-11

Cain did not include any consideration for loan payments during the construction period. A construction period of 29 months means that interest of about \$18M will accrue before the start of operation. Either this amount needs to be paid as regular mortgage payments, or an agreement with the lender may be made to add these payments to the loan principal. The former increases the cash requirement for the project and decreases the return of the investment. The latter increases the debt service by more than \$2M per year. Neither of these is beneficial to an investor.

Figure 4 shows the effect of paying off the loan during the construction period. Figure 5 shows the effect of deferring the loan payments with the net result of a higher mortgage payment after operation starts.

	Start	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Yr 6	Yr 7	Yr 8	Yr 9	Yr 10
Total Rev.					22.92	35.41	36.83	38.30	39.83	41.42	43.08
Oper. Exp.					15.18	22.45	23.23	24.04	24.89	25.76	26.66
Oper. Inc.					7.74	12.97	13.60	14.26	14.95	15.67	16.42
Cap. Exp.					-0.38	-0.40	-0.41	-0.42	-0.44	-0.45	-0.47
Working Cap.		-0.04	-0.08	-0.12	-0.12	-2.52					
Debt Service		-7.28	-7.28	-7.28	-7.28	-7.28	-7.28	-7.28	-7.28	-7.28	-7.28
Cash Flow	-50.00	-7.32	-7.36	-7.78	-0.05	2.76	5.90	6.54	7.22	7.92	9.15
Bldg Depr.				-5.90	-5.90	-5.90	-5.90	-5.90	-5.90	-5.90	-5.90
Net Profit		-7.32	-7.36	-13.68	-5.95	-3.14	0.00	0.64	1.32	2.02	3.25
Cum Profit		-7.32	-14.67	-28.35	-34.30	-37.44	-37.44	-36.80	-35.48	-33.45	-30.20
10 year IRR=	-8%										

**Figure 4. This shows the effect of loan payments during the construction period. Note that the project will not reach profitability until well after year 10. Over 10 years the project losses are over \$30M. The IRR worsens to -8 percent.**

KY1-11  
(cont.)

	Start	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Yr 6	Yr 7	Yr 8	Yr 9	Yr 10
Total Rev.					22.92	35.41	36.83	38.30	39.83	41.42	43.08
Oper. Exp.					15.18	22.45	23.23	24.04	24.89	25.76	26.66
Oper. Inc.					7.74	12.97	13.60	14.26	14.95	15.67	16.42
Cap. Exp.					-0.38	-0.40	-0.41	-0.42	-0.44	-0.45	-0.47
Working Cap.		-0.04	-0.08	-0.12	-0.12	-2.52					
Debt Service					-10.17	-10.17	-10.17	-10.17	-10.17	-10.17	-10.17
Cash Flow	-50.00	-0.04	-0.08	-0.50	-2.95	-0.13	3.00	3.65	4.32	5.03	6.25
Bldg Depr.				-5.90	-5.90	-5.90	-5.90	-5.90	-5.90	-5.90	-5.90
Net Profit		-0.04	-0.08	-6.40	-8.85	-6.03	-2.89	-2.25	-1.57	-0.87	0.36
Cum Profit		-0.04	-0.12	-6.52	-15.36	-21.40	-24.29	-26.54	-28.11	-28.98	-28.63
10 year IRR=	-10%										

**Figure 5. Deferred debt payments until year 4 results in higher debt payments over life of loan. 10 year IRR worsens to -10 percent. The project loses about \$29M over ten years.**

#### Fourth Error

Cain used an escalation factor in room rate of 4% per year and an escalation factor of 3.5% per year in the calculations. The room rate escalation is about twice the inflation rate. Given that their room rates are higher than prevailing rates in the area, their assumptions of 95% occupancy are optimistic. Lower occupancy rates will mean lower profits (or higher losses).

KY1-12

	Start	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Yr 6	Yr 7	Yr 8	Yr 9	Yr 10
Total Rev.					22.92	33.39	34.06	34.74	35.44	36.15	36.87
Oper. Exp.					15.18	22.12	22.56	23.01	23.47	23.94	24.42
Oper. Inc.					7.74	11.27	11.50	11.73	11.96	12.20	12.45
Cap. Exp.					-0.38	-0.40	-0.41	-0.42	-0.44	-0.45	-0.47
Working Cap.		-0.04	-0.08	-0.12	-0.12	-2.52					
Debt Service					-10.17	-10.17	-10.17	-10.17	-10.17	-10.17	-10.17
Cash Flow	-50.00	-0.04	-0.08	-0.50	-2.95	-1.83	0.90	1.12	1.34	1.56	2.28
Bldg Depr.				-5.90	-5.90	-5.90	-5.90	-5.90	-5.90	-5.90	-5.90
Net Profit		-0.04	-0.08	-6.40	-8.85	-7.72	-4.99	-4.78	-4.56	-4.33	-3.62
Cum Profit		-0.04	-0.12	-6.52	-15.36	-23.09	-28.08	-32.86	-37.41	-41.75	-45.37
10 year IRR=	###										

**Figure 6. The effect of using a room rate and operating expense escalation factor of 2% per year is shown. This represents a more realistic representation of room rates. Project does not reach profitability in ten years. Note that the cumulative profit after ten years is \$-45M, worse by \$-17M than a 4% per year escalation. IRR is meaningless because there is too little positive cash flow in 10 years.**

#### Fifth error

KY1-13

There is no contingency for cost overruns and schedule slippage. Because these are hard to predict, many projects keep a reserve on hand. There may be a small reserve of less than \$3M included in Cain's model. But BCHD has no track record for successfully managing projects to cost and schedule. In fact, as an organization with a budget of less than \$15M per year, there is no infrastructure to manage a \$250M project. Since projects of this nature can overrun by more than 50%, and have

schedule stretches of 50% or more. The hit on profit is large. For a \$50M overrun (about 20%) The hit on profit is about \$1.5M per year. This will only make a bad situation worse.

KY1-13  
(cont.)

There needs to be an analysis of what the impact to the project would be if these overruns happened. For example, would the overrun be funded by the joint venture, or only by the commercial partner? Would BCHD be required to fund 20% of the overrun? If the overrun was \$100M, does BCHD have the \$20M on hand to fund the overrun?

Schedule slips further erode profit potential by slipping the date that full operation is achieved. Probabilities for these occurring need to be assessed and full contingency plans developed.

## Summary

The errors made by Cain were all made to boost the attractiveness of the HLC. But as we have shown in the charts above, more reasonable assumptions show that the project is a loser, financially. But is it realistic that an assisted living center shows losses for such a long period.

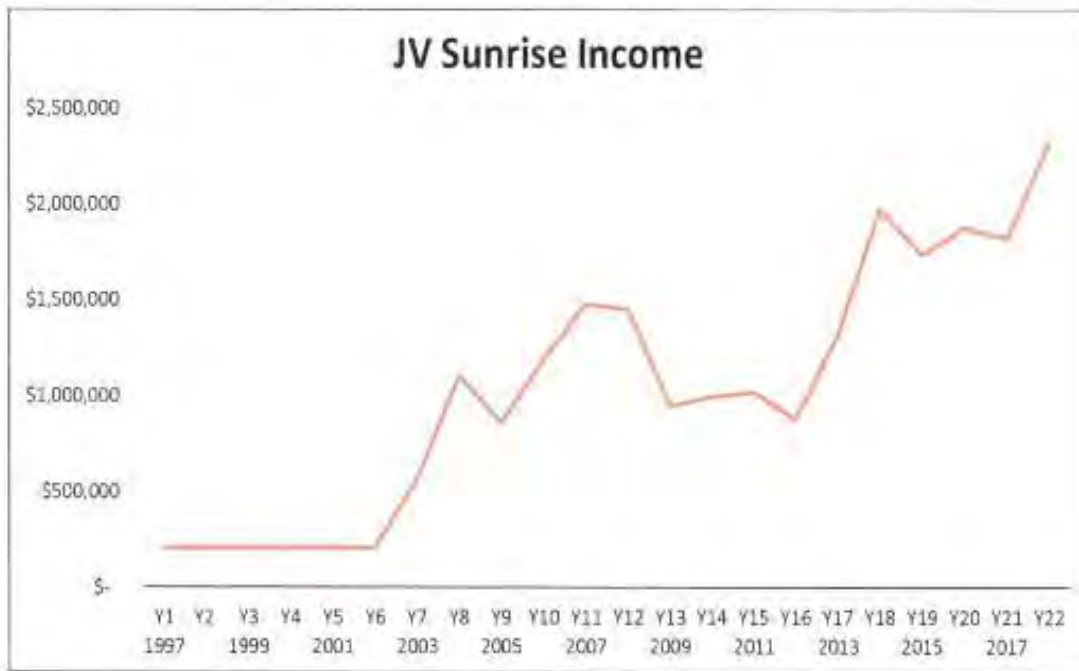
KY1-14

The answer lies in BCHD's own experience with assisted living. In 1999, BCHD bought 80% ownership in the Sunrise Hermosa Beach assisted living center. The business had been open since around 1985. Details of the finances prior to 1997 are unavailable. A public records request was made to get the annual reports of Sunrise Hermosa Beach. This request was denied by BCHD citing the proprietary nature of that business. The only inkling about the profitability of Sunrise Hermosa Beach is from a chart presented at a BCHD Study Session on March 27, 2019.

Figure 7 shows the income from Sunrise to BCHD. The straight horizontal line from years 1997 to 2001 is the income from the lease of the land from BCHD, not operational profit. Sunrise leased the land from BCHD at a rate of around \$200K per year, that corresponds to the straight line in the first years of income.

This indicates that the facility was probably not profitable before 1997. But since we were denied access to that data, we can only speculate about this. Is BCHD willing to open the books on Sunrise Hermosa Beach to show what the profit performance was for the first twelve years of operation?





**Figure 7. Sunrise Hermosa Beach Income to BCHD. The operation is not profitable until 2003 as \$204K of income is from the lease of the land to Sunrise. This figure was presented at a BCHD Study Session, March 27, 2019, page 9.**

KY1-14  
(cont.)

So the operation of an assisted-living center that doesn't show regular profit for 17 years is established. The results shown in the spreadsheets, Figures 2-6, are likely a more realistic model of the finances of the HLC than the model presented by Cain.

If Cain disputes the models shown above, they should put forth their revised model that corrects the errors pointed out above.

The reluctance of BCHD to present the financial case for their project is worrisome. First, they have not said anything about their partner, although they have had at least two years to find one. Although they recently commissioned Cain Brothers to seek a partner, they have never presented a financial plan with any substance nor has any partner agreed to their terms. BCHD insists that they will maintain the leadership role in the joint venture. It is highly unlikely, however, that any profit-making enterprise with 80 percent stake would agree to this since it is their capital at risk.

Insistence on leadership with a weak (20%) position, could make it untenable for any partner. Giving up on leadership to get a partner to agree would mean that BCHD could not control the direction to benefit the South Bay community.

## Why doesn't the HLC meet the "Project Pillars" BCHD developed for the DEIR?

KY1-15 It does not appear that BCHD has shown how the HLC meets these "project pillars". First, under Health, the pillar states: "Leverage the campus to expand community health services". Since BCHD has not presented a financial plan that shows that the HLC actually will make money, how can they conclude that they meet this project pillar?

Second, under Community, the pillar states: "Grow a continuum of programs, services, and facilities to help older adults age in their community". Does this pillar refer to all older adults in the community, or does it refer only to those who can afford the astronomical rates proposed for the HLC?

Figure 1 shows data taken from a MDS Research Center in Ft. Worth, Texas report titled Updated Capture Rate/Demand analysis for new assisted living in Redondo Beach, California, Study Update" dated May, 2019. This report was commissioned by BCHD, so BCHD should be fully aware of its findings.

KY1-16

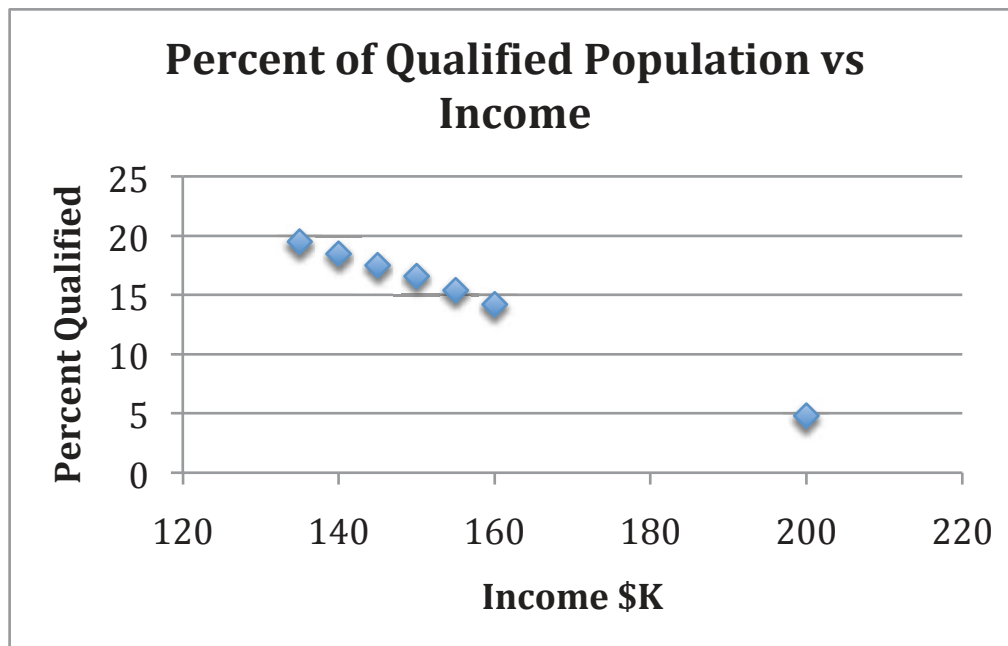


**Figure 1. Annual income required to afford assisted living as function of the room rate. These are discrete data points taken from the MDS report. Note that at a rate of \$12.5K per month, the annual income required is over \$200K.**

The question then becomes, how many people in the Beach Communities can qualify to stay in the HLC? Figure 2 shows the percent of the population with income greater than a specified income level. The greater than \$200K yearly income level

has a population of about 5%. Thus, 95% of adults in the Beach Community will not be able to afford the HLC.

**How does this help the great majority of older adults in Manhattan Beach, Hermosa Beach, and Redondo Beach age in their community?**



**Figure 2. Percent of qualified population versus Income. \$200K income is needed to afford the \$12K per month rate of the HLC. This means that 95% of the population does not qualify.**

If you multiply the percentage of people in the over 75 age group (in 2019 about 5600), by the percentage in this age group who need assisted living care (32%), by the percentage who can afford it (5%), you get a total of about 90 people living in the three beach cities who qualify for living in the HLC. Since the HLC can house 320 in assisted living, about 70 percent of the residents will be from outside the three beach cities.

Ninety people is the addressable market. Many of these will choose other alternatives. Because they are in a high income group, these adults will have many more options available than adults in lower income groups.

**Why is BCHD building the HLC to address such a small population of Beach City residents?**

KY1-16  
(cont.)

People from outside the beach cities do not support BCHD with property taxes.  
Housing people with little ties to the community seems wrong.

**So why are you taking on this tremendous risk?**

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:40 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Torrance Redondo Against Overdevelopment

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** kevork Ajamian <k\_ajamian@yahoo.com>  
**Sent:** Tuesday, June 8, 2021 10:59 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Torrance Redondo Against Overdevelopment

KA-1 I live on prospect ave for 41 year, across street from Vons store,. I am against this overdevelopment for the following reasons:

1) we have enough traffic to deal with currently, this overdevelopment make nightmarish

KA-2 2) there is a nearby school and park, which makes it unsafe for the kids walking around surrounding streets.

KA-3 3) we don't want more pollution in the area. we want clean air to breath.

KA-4 4) all city counsel members needs listen to the local community voices against this overdevelopment.

KA-5 5) we don't want to trade tax dollars in exchange for our safety, and clean environment.

Thank you

Kevin

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:34 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: NO to your Assisted living facility project.

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Yoon, K. M. <kmyoon@yahoo.com>  
**Sent:** Sunday, June 6, 2021 4:33 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** NO to your Assisted living facility project.

Hello,

KY2-1 | I'm writing this email in opposition of your proposal to build the assisted living facility. Your environmental impact report is unsurprisingly geared and biased to move this project forward. It is not possible to mitigate noise, dust and pollution to homes in the vicinity to an acceptable level (I reside in the Pacific South Bay neighborhood directly below this proposed abomination). You will, in addition, bring polluting agents in trucks and those trucks themselves will add pollutants to our air.

KY2-2 | Furthermore, my child will be attending Towers elementary all throughout your proposed construction time-exposed to everything you disclose and unknowns that may become more evident in years to come. You will be responsible for any adverse aftermath.

KY2-3 | Timing of your project, you understate the amount of time to completion and paint a rosy more palatable timeframe to move this project forward. It is more likely than not you will extend this project many more years and residents will have no other choice but to live daily life accommodating your timing. None of these is acceptable.

KY2-4 | This proposed structure will be an eyesore and doesn't blend with the surrounding area. If anything, bulldoze your current property and replace with a park.

Thank you!  
Kyung

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:06 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Opinions

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** L M <smyrlpups3@msn.com>  
**Sent:** Friday, April 9, 2021 5:34 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Opinions

LM-1 I read the EIR report & it was a lot to digest. Overall, I think this project is too big, too tall, & too intrusive in a residential neighborhood with small streets

LM-2 leading to it. The large scale project doesn't seem to align with BCHD's philosophy about Healthy Living. A big project like this seems more appropriate to be near the Galleria Mall, business park, or another already busy area.

The long term disruption to residents & home owners already living nearby seems excessive & wrong. This seems more like a project from greedy contractors/ developers who squeeze-in as large of a building or buildings as possible... the "McMansions" on smaller lots phenomenon.

LM-3 This feels like a BCHD is doing over-building "McMansion style" by building too tall & adding too many units, & going overboard in a quiet residential community!

We call it Project Dinosaur because its just too big & doesn't fit in with the community & will be a long term disruption.

Please reconsider & scale down this project to something more reasonable & fitting for the community.

Sincerely,  
L Mooney



## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:09 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: comments on HLC DEIR --NO to project

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

**From:** Lara Duke <larajs@yahoo.com>  
**Sent:** Tuesday, April 13, 2021 6:11 PM  
**To:** Communications <Communications@bchd.org>; EIR <eir@bchd.org>  
**Subject:** comments on HLC DEIR --NO to project

Regarding BCHD Healthy Living Plan

- LD1-1 Even if this development were needed, it should be on an RH zone--residential high density, not a Public zone. The majority of this plan would not be for community public use—it'd be a for-profit business on public-designated land, and that's wrong. It would threaten the health of the residents and the neighborhoods themselves. The board members already
- LD1-2 know this, but don't care given they've ignored the residents and increased the size and scale of the project since 2019.
- LD1-3 With schools and homes in every direction, the fallout from this massive development would include-- impossible traffic, destruction of property values, and loss of neighborhood character.
- LD1-4 The DEIR asserts there would be no or only minimal adverse effects caused by this project. They end a lot of these points with "...and would not substantially," fill in the blank, "...obscure views of the open sky above, negatively impact traffic, interfere with the neighborhood character." How can anyone with a straight face make such statements when you're wanting to put a giant residential commercial building in the middle of a sleepy neighborhood?
- LD1-5 The Planning Commission and City Council of Redondo Beach need to know that their review is critical to this project and they need to hear from residents. Their review should be easy in recognizing it should not be allowed, but they need to hear from you! Them signing off on this project would be an abdication of their duties if they deem this a suitable project for the area. It is a behemoth structure in a residential neighborhood—completely out of character to surrounding structures. BCHD isn't listening, so we must encourage our city representatives that this RCFE (Residential Care Facility for the Elderly) should not be allowed at this site.

Thank you.  
Lara Duke  
Redondo Beach

## Meisinger, Nick

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:10 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: No to HLC

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**From:** larajs <larajs@yahoo.com>  
**Sent:** Saturday, April 17, 2021 12:04 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** No to HLC

Regarding BCHD Healthy Living Plan

- LD1-1 Even if this development were needed, it should be on an RH zone--residential high density, not a Public zone. The majority of this plan would not be for community public use—it'd be a for-profit business on public-designated land, and that's wrong. It would threaten the health of the residents and the neighborhoods themselves. The board members already
- LD1-2 know this, but don't care given they've ignored the residents and increased the size and scale of the project since 2019.
- LD1-3 With schools and homes in every direction, the fallout from this massive development would include-- impossible traffic, destruction of property values, and loss of neighborhood character.
- LD1-4 The DEIR asserts there would be no or only minimal adverse effects caused by this project. They end a lot of these points with "...and would not substantially," fill in the blank, "...obscure views of the open sky above, negatively impact traffic, interfere with the neighborhood character." How can anyone with a straight face make such statements when you're wanting to put a giant residential commercial building in the middle of a sleepy neighborhood?
- LD1-5 The Planning Commission and City Council of Redondo Beach need to know that their review is critical to this project and they need to hear from residents. Their review should be easy in recognizing it should not be allowed, but they need to hear from you! Them signing off on this project would be an abdication of their duties if they deem this a suitable project for the area. It is a behemoth structure in a residential neighborhood—completely out of character to surrounding structures. BCHD isn't listening, so we must encourage our city representatives that this RCFE (Residential Care Facility for the Elderly) should not be allowed at this site.

Thank you.  
Lara Duke  
Redondo Beach

[310-529-9599](tel:310-529-9599)

Sent via the Samsung Galaxy Note9, an AT&T 5G Evolution capable smartphone

DEIR and BCHD Healthy Living Plan,

LD3-1 BCHD CEO Tom Bakaly asserts that the HLC plan does not require a vote of the people. It will need a CUP (conditional use permit) authorized by the Planning Commission and the City Council. So, yes it will get a vote of the people since the commission and council are made up of people acting as the public's designees in such matters. They will vote yes or no to approve a CUP. In laymen's terms this means RCFEs are not allowed on public zoned land, so if you want it there, an exception from these two groups must be approved for the project to move forward. Bakaly implies that since the Silverado Memory Care got a CUP, then the HLC plan should also. Yet, the plan on the table is a monstrous, for-profit private entity (though claimed to be a "public-private" partnership). It's presented as necessary in a city with senior housing options in every direction. It's the antithesis to what should be granted an exception on a publicly-zoned area, in the middle of a quiet residential neighborhood. Further, presenting it as a savior to the city for help with RHNA numbers is a farce, since the private operator has yet to be determined, so how would we know they'll be fine with 10% below market rate units?

LD3-3 Even if this development were needed, it should be on an RH zone--residential high density, not a Public zone, as this site is designated. The majority of this plan would not be for community public use—it'd be a for-profit business on public-designated land, and that's wrong. It would threaten the health of the residents and the neighborhoods themselves. The board members already know this, but don't care given they've ignored the residents and increased the size and scale of the project since 2019. With schools and homes in every direction, the fallout from this massive development would include-- impossible traffic, destruction of property values, and loss of neighborhood character.

LD2-6 The DEIR asserts there would be no or only minimal adverse effects caused by this project. They end a lot of these points with "...and would not substantially," fill in the blank, "...obscure views of the open sky above, negatively impact traffic, interfere with the neighborhood character." How can anyone make such statements when at issue is putting a giant residential commercial building in the middle of a sleepy neighborhood?

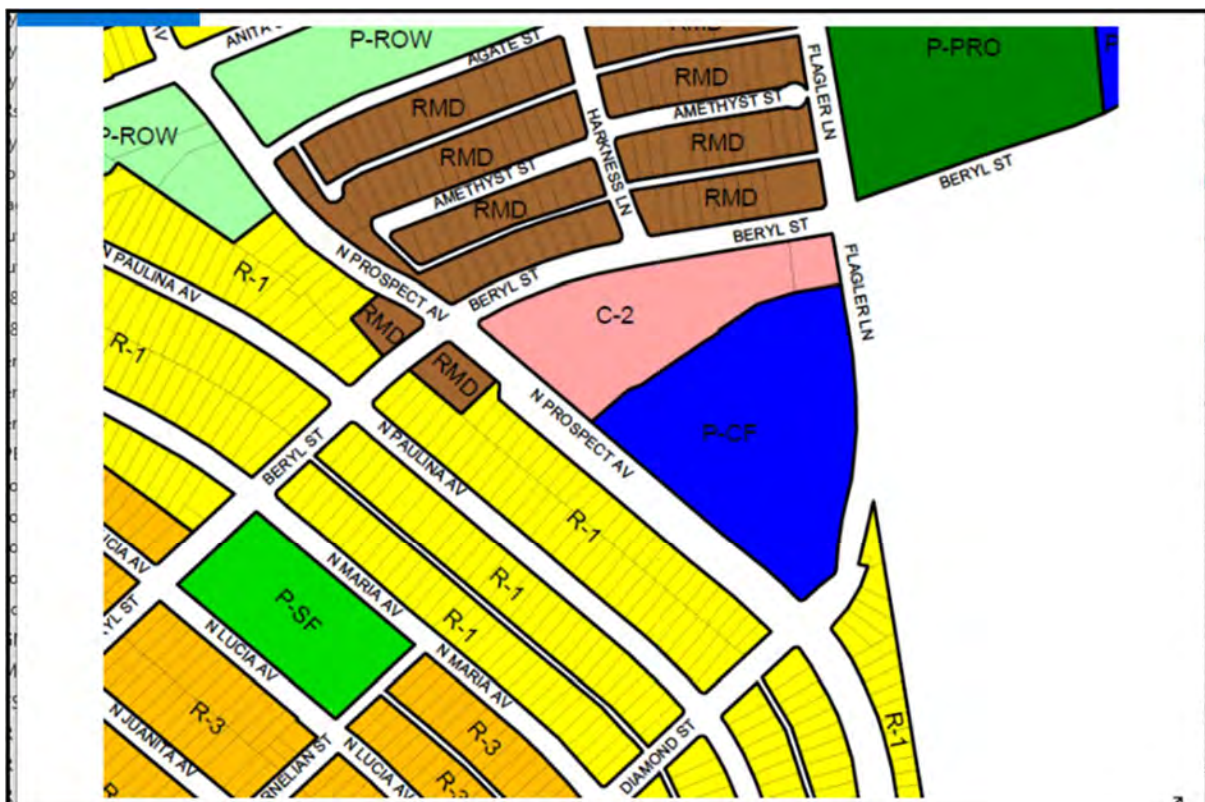
LD3-7 The Planning Commission and City Council of Redondo Beach need to be reminded that their review is critical to this project and they need to hear from residents. Their review should be easy in recognizing the spirit of this public zone allows for open space and recreational facilities, period. This fact is especially critical since Redondo Beach suffers a density crisis as it is, and faces more with the possibility of state density bills passing in the future. Our city planning commission and city council have the control and will see that a privately run, massive and unnecessary structure in a public zone, warrants a sound denial for a CUP.

Thank you,  
Lara Duke  
Redondo Beach

LD2-8 Below shows the singular allowable uses (P for permitted) on P-CF property. That is: Parks, parkettes, open space, recreational facilities, beaches and coastal bluff. ALL other uses require an exception (C for conditional) requiring a CUP from the city reps.

Use Classifications	P-CIV	P-RVP	P-GP	P-ROW	P-CF
<b>Public and Other Uses</b>					
Parks, parkettes, open space, recreational facilities, beaches, and coastal bluffs	P	P	P	P	P
Public buildings in parks, recreation areas, open space areas, and beaches	C	C	C	C	C
Adult education centers	—	—	—	—	C
Agricultural and horticultural uses	C	—	—	C	C
Child day care centers	C	—	—	—	C
Community centers	C	—	—	—	C
Cultural institutions	C	—	—	—	C
Government maintenance facilities	C	—	—	—	C
Government offices	C	—	—	—	C
Public gymnasiums and athletic clubs	C	—	—	—	C
Hospitals	—	—	—	—	C
Medical offices and health-related facilities	—	—	—	—	C
Nurseries, wholesale and retail	C	—	—	C	C
Performance art facilities	C	—	—	—	C

Use Classifications	P-CIV	P-RVP	P-GP	P-ROW	P-CF
Parking lots	C	C	—	C	C
Public safety facilities	C	—	—	—	C
Public utility facilities	C	C	C	C	C
Residential care facilities	—	—	—	—	C
Railroad uses	—	—	—	P	—
Schools, public and private	—	—	—	—	C
Accessory uses/structures	P	P	—	P	P



## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:15 PM  
**To:** Meisinger, Nick  
**Subject:** Fw:

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**From:** marinafinearts@aol.com <marinafinearts@aol.com>  
**Sent:** Wednesday, May 26, 2021 5:17 PM  
**To:** EIR <eir@bchd.org>  
**Subject:**

LW-1 | Myself, Laura Woolsey, and my husband Michael have live on Tomlee Ave behind the hospital for 30+ years. The size and scope of the proposed development are way too large !!!! We strongly oppose any development there unless it is on the Prospect side of the property. I do not want the development to impact the Torrance side of the property !!  
Laura Woolsey

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:56 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Comments on the DEIR for the BCHD RCFE  
**Attachments:** DRAFT ENVIRONMENTAL IMPACT REPORT.docx

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**From:** Laura Zahn <myhomecastle@yahoo.com>  
**Sent:** Thursday, June 10, 2021 3:51 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Comments on the DEIR for the BCHD RCFE

Please see attached comments on this proposed project.

Laura D. Zahn

**DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR BEACH CITIES  
HEALTH DISTRICT (BCHD) RESIDENTIAL CARE FACILITY FOR THE  
ELDERLY (RCFE)**

**Beginning with the design and development process, of BCHD, RCFE, there have been numerous and valid “CONCERNS” brought forward.**

**Too tall, too big, too much construction noise, too much construction traffic, too many environmental hazards, too much pollution exposure to the surrounding neighborhoods and communities, too many resources of the City of Redondo Beach going to support the completed projected, too expensive for local folks to live there, too outside of the zoned purpose for the land, too much overreach on the part of the BCHD which only INCLUDES the three ORIGINAL cities of Manhattan Beach, Hermosa Beach, and Redondo Beach, too costly for the three Beach Cities tax base monies for the SMALL return of use by a fractional percentage of the three cities residents.**

**My “CONCERNS” ARE ABOUT THE PEOPLE WHO WILL ACTUALLY LIVE ON-SITE (IF THIS EVER GETS BUILT) As, a side note... I have worked in Elder Care for 12 years. I have worked at High End Facilities and State Ran Facilities. I have worked with the largest Privately Held Elder Care Company in the world and I have worked with the largest Franchised Elder Care Company in the world, along with smaller independent companies, and private duty families.**

**HERE ARE MY REAL LIFE “CONCERNS” THAT I HAVE EXPERIENCED BEING “ON-STAFF” AT AN RCFE.**

**LAURA D. ZAHN**



## **COMMUNIAL CO-HABITATION “CONCERNS”**

**(NO ONE TALKS ABOUT WHILE LIVING IN A  
RESIDENTENTIAL CARE FACILITY FOR THE ELDERLY)**

### **INTERPERSONAL CONCERNS**

#### **Shared Rooms... IN THEORY**

**Two nice well behaved friendly elderly people...**

- 1) Who sleep on the SAME schedule.**
- 2) Who like the SAME room temperature**
- 3) Who have the SAME physical capabilities (NO assistance  
Needed to move about the room, use the bathroom, dress)**
- 4) Who like the SAME TV shows, the SAME music at the SAME  
volume**
- 5) Who wear the SAME amount of clothes (tops/bottoms/under  
Wear/shoes/pajamas)**
- 6) Who have the SAME nice well behaved friendly family and  
Friends visit them**
- 7) Who share the SAME taste in foods, smells, snacking sounds,  
Snacking noise, snacking time lines.**

### **Shared Rooms... IN REALITY**

- 1) One person LIKES to go to bed really late and snores**
- 2) One person LIKES the room HOT/COLD**
- 3) One person LIKES to /Expects you to HELP THEM**
- 4) One person LIKES Reality TV/Game Shows/Talent Shows/  
Dr. Phill/Judge Judy type drama shows REALLY LOUD**
- 5) One person LIKES to not have too many or NO clothes on**
- 6) One person LIKES their LOUD, RUDE, SKETCHY family/friends**
- 7) One person LIKES heavily seasoned snacks, crunchy/messy  
Snacks/snacks early in the morning/late at night**

### **BUILDING "CONCERNS"**

#### **ELEVATORS...**

**Elevators are "Temperamental" electronic things... sometimes the doors open, sometimes they do not. Sometimes the doors close, sometimes they do not. Sometimes you actually reach the floor you intended...sometimes you do not.**

**AND IN AN EARTHQUAKE NO MATTER HOW SMALL...THEY WILL NOT OPERATE AT ALL!!!**

**Could you or your loved one quickly walk DOWN 6 flights of stairs in a panic high-stress situation? Five flights of stairs, four flights of stairs, three flights of stairs, two flights of stairs. AND EACH FLIGHT YOU GO DOWN DOUBLES THE VOLUME OF RESIDENTS TRYING TO EXIT THE BUILDING.**

**Getting OFF on the wrong floor is easy to do on a crowded elevator where you cannot see or reach the buttons, you are trying to jockey for a position ON the elevator, you are jockeying to get OFF the elevator. Would you or your loved one know what to do or to find your way back to your room IF you accidentally got on the wrong floor?**

LDZ-4  
(cont.)

**Elevators get crowded AT meal times. Elevators get crowded when Paramedics/First Responders are on the elevators with their Gurney's and their Emergency gear/bags. Elevators get crowded with Cleaning Crews and their equipment. Elevators get crowded with Maintenance Staff and their equipment. Elevators get crowded with residents moving IN and Out. Elevators get crowded with residents using walkers, wheelchairs, power chairs.**

**IN A PANDEMIC... Elevator use may be severally reduced or entirely restricted. REMEMBER RCFE ARE NOT RESORTS OR HOTELS!!! THERE IS NO ROOM SERVICE FOR MEALS. (OR AT LEAST MEALS AT THE TIME OF DAY THAT MOST PEOPLE ARE ACCOSTUMED TO EATING THEM) RCFE do not have enough staff to cook/serve/and clean up food delivered to each residential room. Could you or your loved one COPE with eating breakfast at lunch time and lunch at dinner time or the other way around? REMEMBER RCFE OPERATE ON A REGULATED ROUTINE TO SAVE ON PAYROLL, PROFIT OVER PEOPLE IN REAL-TIME.**

LDZ-5

**EVEN THOUGH YOU AND YOUR LOVED ONE ARE PAYING TOP DOLLAR FOR LIVING IN A HIGH END RCFE... ALL THE WORKING STAFF (KITCHEN CREWS/CLEANING CREWS/MAINTENANCE CREWS/ ROOM ATTENDANT STAFF/TRANSPORTATION STAFF ARE ALL EARNING MINIMUM WAGE OR SLIGHTLY BETTER).**

**LDZ-6** **HALLWAYS...** Also get crowded with the **SAME** users... First Responders/Cleaning Crews/Maintenance Crews/Move Ins- Move Outs/ Residents using walkers/wheelchairs/Power chairs.

**FIRE...**

Hook and Ladder trucks only reach as high as 7 stories. This facility would only be 6 stories. However... Could you or loved one climb **DOWN** 6 stories on a swaying ladder while the wind is blowing, smoke and flames are billowing, sirens are screeching, residents are screaming, water is spraying... In your pajamas, your day clothes, no clothes... 5 stories down, 4 stories down, three stories down two stories down?

**LDZ-7** **NO** city/County can provide enough First Responders to safely escort each individual resident down a ladder, down multiple flights of stairs, out to a safe area.

This will not be the **ONLY** RCFE in Redondo Beach, First Responders will be needed to respond to **EACH** Facility with only a **LIMITED** amount of trained personnel. Could you or your loved **COPE** with being **“ON YOUR OWN FOR AN EXTENDED PERIOD OF TIME”** IN A **DIRE EMERGENCY** OR **PERHAPS NEVER HAVE ANY ATTENDING FIRST RESPONDERS ARRIVE AT ALL???**

**DINING HALL...**

In the dining hall could you or your loved one **“DEFEND”** your meal from being pilfered by a **MORE MENTALLY ALERT** or **MENTALLY ALTERED** table mate or wandering resident?

**LDZ-8** Could you or your loved one **COPE** with residents getting sick (throwing up/throwing food/) in the dining hall? Could you or your loved one **Cope** with cutting up your food, feeding yourself, drinking, and enjoying your meal?

## **MISCELANEOUS DAILY THINGS...**

**Could you or your loved one COPE with having windows that do not open to let the natural breezes in?**

**Could you or your loved one COPE with not having a patio or porch to sit in the sun/outside on?**

**Could you or your loved one COPE with NEVER BEING ALONE EVER AGAIN?**

**Could you or your loved one COPE with getting woken up at 5 AM for a shower and then dressed and put back to bed to be awoken again around 7 AM to eat Breakfast in the Dining Hall?**

**REMEMBER RCFE ARE NOT RESORTS. ATTENDING STAFF HAVE 8 RESIDENTS TO WAKE UP/ SHOWER/ DRESS AND MOVE TO THE DINING HALL BY 7 AM. SOMEONE HAS TO BE FIRST AND SOMEONE HAS TO BE LAST. FIFTEEN MINUTES IS ALL YOU OR YOUR LOVED ONE GETS.**

LDZ-8  
(cont.)

**ALL FACILITIES "SAY" THEY PROVIDE ONE-ON-ONE ATTENTION...YEAH... ONLY FOR A FEW MINUTES AT A TIME OR AFEW MINUTS A DAY! PROFIT OVER PEOPLE IN REAL-TIME!**

**Could you or your loved one COPE with Paramedics/First Responders entering your shared room at ALL hours of the day to attend to your roommate? Usually a minimum of 5- responders in gear, with LOTS of equipment.**

**Could you or your loved one COPE with Paramedics/First Responders with Gurney's and Responders rushing down the hall at all hours day or night, or entering the dining hall while you are trying to eat, or the TV room while you are trying to relax.**

**Could you or your loved one COPE with watching someone you "KNOW" die In front of you? Fall and bust their head open in front of you? Break a bone or multiple bones in a fall in front of or near you?**

**You or your loved one may be a “fall risk”. A facility staffer is NOT allowed to prevent or try to prevent you from falling. (Insurance Policies prevent this, due to “injury to the staff). They can however provide assistance once you have fallen... to the ground, out of the chair, off the bed.**

**The facility MAY have on “staff” A Music person, A Craft person, An exercise person, An Activities person... ALL of whom will have calendars FULL of daily activities that will RARELY be implemented, due to low attendance, low participation, low attention spans, not enough staff to physically move the residents to and from these activities.**

LDZ-8  
(cont.)

**Could you or your loved one COPE with NOT being allowed to take a nap in the TV room, the game room, or wherever they sit you down? It “LOOKS” bad if any potential resident and their family come to view the facility to have residents sleeping in chairs around the building.**

**Could you or your loved one COPE with being MOVED every two hours? From your room TO the Dining Room, TO the bathroom, TO the TV room, TO the game/activity/music room, TO the Dining room for a morning snack, TO the bathroom again, TO the patio, TO the Dining Room for a late afternoon snack, TO the bathroom, TO the dining room for dinner. Remember EACH staff person has to move 8 residents throughout the day EVERY two hours.**

**Could you or your loved one COPE with a combative roommate or a wandering resident? BY LAW AN RCFE CAN NOT RESTRAIN A RESIDENT NO MATTER HOW ALTERED THEIR MENTAL STATE IS. An RCFE cannot “drug” a resident either, to “calm them down. An RCFE can only administer what that resident’s Dr. has prescribed.**

**Could you or your loved one COPE with your own natural progressive mental and physical decline? Do you have family or friends that could “understand” the changes going on with you or your loved one? If another resident physically injured you or your loved one, do you TRUST the RCFE to tell you the truth as to what actually happened?**

**I UNDERSTAND THAT MOST OF YOU READING THIS HAVE NEVER EVEN THOUGHT OF SCENARIOS SUCH AS THESE. TRUST ME I HAVE SEEN THEM. (ALL BUT THE NATURAL DISASTERS. HOWEVER I DID CARRY A THREE YEAR OLD DOWN 9 FLIGHTS OF STAIRS IN A HIGH RISE BUILDING WHEN AN EARTHQUAKE SHUT DOWN THE ELEVATOR. MY FRIEND WHO I WAS VISITING WITH AT THE TIME WHO IS A PARAPLEGIC HAD TO BE LEFT IN HER APARTMENT ALONG WITH HER CAREGIVER. THANKFULLY THERE WAS NO MAJOR DAMAGE FROM THE EARTHQUAKE. BUT WHAT A HORRIBLE ORDEAL FOR MY FRIEND WHO HAD NO WAY TO ESCAPE IF THE EARTHQUAKE WAS ANY MORE SEVERE.**

**MY “RECOMMENDATIONS” DO NOT BUILD RCFE HIGHER THAN THREE STORIES (PREFERABLY ONLY TWO STORIES) PAY YOUR STAFF WELL. DO NOT OVER WORK THEM. 4 RESIDENTS TO A STAFF PERSON WOULD MAKE EVERYONE’S DAY A LOT MORE ENJOYABLE. MAKE ALL THE ROOMS SINGLE OCCUPANCY ROOMS. PROVIDE PLENTY OF OUT DOOR TIME AND OUTDOOR SPACES. HAVE SMALLER EATING/DINING ROOMS THAT ARE NOT AS NOISY OR CONFUSING. KEEP HALLWAY MOVEMENT OF STAFF TO A MINIMUM (CLEANING CREWS/MAINTENANCE CREWS) TO CUT DOWN ON THE NOISE AND ‘BUSYNESS’ OF THE HALLS. HIRE PEOPLE THAT TRULY HAVE A PASSION FOR WORKING WITH THE ELDERLY. NOT JUST NEEDING A JOB. HIRE STAFF THAT HAVE BEEN TRAINED IN THE VARIOUS “CONDITIONS” THAT ELDERLY PEOPLE MAY BE EXHIBITING OR EXPERIENCING. HIRE STAFF THAT CAN COPE WITH ALL THAT THEY**



LDZ-9  
(cont.)

**WILL BE EXPOSED TO IN ANY GIVEN DAY...DEATH/INJURY/ABUSIVE  
RESIDENTS/ANSWERING DETAILED QUESTIONS ABOUT “WHAT  
HAPPENED” TO MR. /MRS. XXXX IF A FACILITY OR POLICE REPORT  
WILL NEED TO BE MADE.**

**LAURA D. ZAHN**

**310-693-3317**

**myhomecastle@yahoo.com**

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 11:33 AM  
**To:** Meisinger, Nick  
**Subject:** Fw: Healthy Living Campus pool

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**From:** Leanne Clifton <hermosa5us@yahoo.com>  
**Sent:** Wednesday, March 24, 2021 1:21 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Healthy Living Campus pool

LAC-1 The entire project does seem to be a bit too large. My main concern is the idea of doing a leisure pool. That is not in keeping with your supposed purpose, which I thought was community health. Floating around in a pool or lazy river with slides etc., is so not improving your health. It is pure and simple entertainment. I do think an Olympic pool would be wonderful. There are many sports teams and activities, school, club, adult education, that need an Olympic size pool. My grandson has played water polo for the last seven years. The club teams and high schools are always scrambling to find a place to practice and to play games because there are so many others are all trying to use the limited pool space. A  
LAC-2 leisure pool will not work for this huge number of people. What a shame it would be to put all that money into a pool that excludes those that want to exercise and to stay fit. All in the name building something to make our lives healthy. Government run projects really shouldn't stretch their mission to this extent. An Olympic pool can easily be used by the general free swim public. Assign a free swim time each day and during the summer and there you go. The reverse is not so. People that need an Olympic pool cannot use a leisure pool.

Thank you, Leanne and Andy Clifton

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:36 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD Project

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**From:** lh@leannehill.com <lh@leannehill.com>  
**Sent:** Monday, June 7, 2021 3:19 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** BCHD Project

To whom it should concerned,

LHPQ-1 We own and live on Cluster Lane and 190th Street ( 22 years ) We have seen many changes, some good for our neighborhood and some not. We endured the construction of the state-of-the-art gas lines running though the dog park at the end of cluster. This project was originally a one-year project, three years later we still deal with continued construction, traffic disruptions, noise, and a lot of dust!. We have a lovely facility up the street called The Silverado  
LHPQ-2 which has houses friends and loved ones alike. The proposed assisted living facility currently starts at \$ 10K per month, per person. Only the affluent will be able to afford living in this new facility. I want to express my opposition to this enormous, oversized overcharged facility. It will block out air space, cause traffic problems, create pollution, dust, all lasting 5 plus years!. This will not benefit residence in these neighborhoods. For those of us that are long term residence  
LHPQ-3 who have spent hour upon hours working toward a community we can all enjoy. This proposed plan is not taking our quality of life into consideration.

Lastly, what about the thousands of Torrance and Redondo Beach residents this will impact negatively. 5 years of not enjoying quite time in your yards with friends and family without day in and day out noise, dust, not to mention the harmful emissions spewing into the air for 5 years.

LHPQ-4 It seems to me this is just a money maker for the owner/builder and the city at the expense of throwing its residents under the bus.

LHPQ-5 I am vehemently opposed to this project.

**Leanne Hill and Peter Quelch**

## Meisinger, Nick

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**From:** EIR <eir@bchd.org>  
**Sent:** Monday, July 12, 2021 3:23 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD proposed building project on Prospect

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**From:** LINDA Zelik <linzelik@gmail.com>  
**Sent:** Sunday, June 6, 2021 9:05 PM  
**To:** cityclerk@redondo.org <cityclerk@redondo.org>; cityclerk@torranceca.gov <cityclerk@torranceca.gov>; citycouncil@hermosabeach.gov <citycouncil@hermosabeach.gov>; cityclerk@citymb.info <cityclerk@citymb.info>; skeller@rbusd.org <skeller@rbusd.org>; superintendent@tUSD.org <superintendent@tUSD.org>; stowe.tim@tUSD.org <stowe.tim@tUSD.org>; rbpta@rbusd.org <rbpta@rbusd.org>; torranceptas@gmail.com <torranceptas@gmail.com>; Communications <Communications@bchd.org>; EIR <eir@bchd.org>; pnovak@lalafco.org <pnovak@lalafco.org>; GChen@TorranceCA.Gov <GChen@TorranceCA.Gov>  
**Cc:** TRAO90503@gmail.com <TRAO90503@gmail.com>  
**Subject:** BCHD proposed building project on Prospect

To whom it may concern;

I am a 36 year resident of north west Torrance and live less than 2 blocks from the proposed building site.

My husband and I, as well as our neighbors, have been actively involved for years and frequently voiced our opinions against this terrible travesty at both the in-person and zoom meetings.

LJZ-1 Unfortunately all of our very valid concerns not only have fallen on deaf ears, but the project's proposed square footage and height keeps mushrooming, getting more absurd each year.

Tragically, the adverse consequences for the community are much worse now than even when originally proposed.

We are vehemently opposed to this ill-advised monstrosity for many reasons:

LJZ-2 **\*Health hazards.** The demolition and construction for 5-10 years will result in fallout from the airborne contaminants including concrete dust, asbestos, lead, PCB's & probable mold, among others.

These contaminants will certainly be detrimental to the local residents, particularly school children, seniors and persons with asthma. It is not hard to anticipate many **expensive lawsuits** from this.

LJZ-2  
(Cont.)

Within a one mile perimeter there are five schools whose students will be adversely affected, Towers Elementary, Parras Middle School, Beryl Heights, West High and Redondo High. Most especially Towers as their playground is less than 100 feet away! Have you considered that the **children will not be able to play outside for well over five years?** Have you even cleared this with the respective school boards?

LJZ-3

**\*Illegal Zoning.** This 11 acre plot of land was never intended for a **commercial, for-profit business.** This was always intended to be for the use of, and the betterment of, the local residents. This high priced business venture to house rich senior citizens **absolutely does not qualify!** Therefore you are **breaking the longstanding laws and codes** put in place to protect local citizens.

LJZ-4

**\*Traffic/Safety Issues.** The streets around Prospect, Beryl, Flagler and Del Amo (which surround a large strip mall) are already extremely congested. This project would not only double the traffic congestion but would cause severe safety issues for the children attending the five schools mentioned above. Children cross these surrounding streets by foot, on bikes and on skateboards. Again, our children should not be subject to these life and death dangers that this project will create. If you don't care about children's lives, do you at least care about the lawsuits that will result?

LJZ-5

**\*Quality of Life for Redondo and Torrance residents.** This mammoth project does **not fit** into this residential community! Building something the size of The Staples Center in a residential area is detrimental to our quality of life in many respects. One of which is that it will block sunlight and ocean breeze for the nearby residents. Not to mention, our property values have decreased because this over-building plan **might** go to fruition.

LJZ-6

**I implore you, please DO NOT go forward with this proposed project!** Certainly you can find other, more community friendly uses for this land.

Linda and Joe Zelik  
19405 Linda Dr., Torrance

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:44 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Objections to the BCHD project

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**From:** Linda Kranz <linda.kranz5@gmail.com>  
**Sent:** Wednesday, June 9, 2021 4:11 PM  
**To:** EIR <eir@bchd.org>  
**Cc:** Residents Against Overdevelopment <trao90503@gmail.com>  
**Subject:** Objections to the BCHD project

Attention: BCHD project

I am writing to you today in regards to the BCHD project. I have many concerns about the proposed project and the effects on our community in West Torrance.

LK-1

We have been residents of West Torrance since 1998 but my husband and I have been lifelong residents of the South Bay. Our attraction to the neighborhood was the close-knit community it provides to our family. We are very fortunate to know all our neighbors and consider many of them to be like family. Both of our children attended Towers Elementary, Bert Lynn, and West High school. They were both fortunate to be able to walk home from school, play sports and participate in many activities at school. With the proposed BCHD project, there are many aspects of the development that will put the health and safety of our community at risk.

The proximity to Towers Elementary, including the BCHD access to Flagler Lane, Flagler Alley and all associated land within the city of Torrance, poses a great threat to the safety of all the school children who regularly walk/bike to school with the increase in traffic, many of the vehicles will be large construction or commercial vehicles. Not only is this a great safety risk, the increase in traffic in the area will also impact access to the shopping center, dog park, and neighborhood.

LK-2

The environmental issues are a huge concern. We love the ocean breeze here but with the possibility of construction particulates flowing into our neighborhood, especially so close to an elementary school, the hazards for unhealthy air quality is alarming. We have long been concerned about air quality issues because of the refinery and have an air quality monitor tied to the AQMD site on our street, this construction will heighten the concerns for unhealthy particulates. We walk our dog to Entradero Park every morning and have enjoyed the wildlife there since the water restoration project. We are also concerned with the noise pollution as well.

LK-3

LK-4

Please don't let the environmental impacts of the BCHD project risk harm to the local wildlife. It's hard enough we are witnessing historic climate change crises around our state affecting our health but this is something that we have control over in our own backyard.

LK-5

Another concern is the level of noise caused by the construction. Noise travels in this neighborhood. I can hear fog horns from the harbor which is much further. I regularly enjoyed hearing the West High band practicing out on the Fred Peterson field. I can't imagine listening to construction noise, daily, for years!

LK-6

This project is out-of-scope for this quaint neighborhood, too large, too costly, with little value-added to our quality of life in this community.

LK-7

I fully oppose the BCHD overdevelopment, especially the BCHD access to Flagler Lane, Flagler Alley and all associated land within the city of Torrance.

Please feel free to contact me for any follow-up questions.

Thank you,  
Linda Kranz  
19312 Hinsdale Ave.  
Torrance, CA 90503

File: DEIR objections



## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 11:42 AM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Comments to be read into the record

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**From:** Lisa Youngworth <lisa\_youngworth@hotmail.com>  
**Sent:** Wednesday, March 24, 2021 3:50 PM  
**To:** Communications <Communications@bchd.org>  
**Subject:** Public Comments to be read into the record

LY-1 I oppose the healthy live in campus project. There are traffic, safety, health and environmental hazards. There is a lack of transparency with the public. It's too tall and too dense for a residential neighborhood. It's a poor use of taxpayer funds.

Sincerely,  
Lisa Youngworth

LY-2 PS I totally agree with the details in this attached link and couldn't have stated it better myself. No need to reinvent the wheel.  
<https://www.traonews.org/why-oppose>

Sent from my iPhone

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:27 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Comment to the BCHD HLC DEIR  
**Attachments:** HardyComment.pdf

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**From:** Lyn Hardy <lyn.hardy@gmail.com>  
**Sent:** Thursday, June 3, 2021 1:37 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Public Comment to the BCHD HLC DEIR

Attached is my public comment.

Lyndon Hardy

\* The DEIR Description of Phase 2 is Deficient

The DEIR executive summary states (ES-2): "... the EIR analyzes potential construction related impacts (e.g., ground disturbance) and aesthetics impacts (e.g., building heights) using conservative assumptions related to maximum building footprints and maximum building heights..."

- Aesthetics

However, there are *no visualizations* of Phase 2 structures. The public has *no* concrete data upon which to judge the visual impact of the Aquatic Center and Parking Structure on the surrounding neighborhoods. These visualizations must be provided.

The DEIR executive summary (ES-1) states that the DEIR information for Phase 2 is based on the "best information available at this time."

This is an excuse, not an allowable justification. The purpose of the EIR process is to assess the environmental impacts of a proposed project according to CEQA requirements. If some critical information is unavailable at some point in time, the proposer must defer presenting the DEIR to the public until it is available, not merely when it happens to be convenient.

Critical information is missing for both Traffic and Air Quality analyses.

- Traffic

The analysis of the increase in traffic caused by Phase 2 construction is slipshod and woefully inadequate. Data was handed from one ill-equipped, unqualified contractor to another, using information that did not adequately apply. It must be redone with sufficient rigor so that the true Phase 2 traffic impacts can be assessed accurately.

- Air Quality

One of the airborne pollutants from construction are the particulates emitted by diesel engines arriving at, idling while present, and departing from the project site. The smaller the particulate size, the more danger is the health effect.

There are no limit standards for particulates with sizes less than 2.5 microns, but there is strong medical evidence that those with sizes as small as 1.0 microns can cause the most damage to everyone's lungs – especially those designated as sensitive receptors..

Sensitive receptors reside both in the existing Silverado Memory Care facility and home owners to the East of the proposed project site. In addition, students attending Towers Elementary School will be exposed not only in Phases 1, but also in Phase 2.

Analysis of the *cumulative* effect of small particulate exposure to these sensitive receptors is absent in the DEIR and must be provided.

\* The BCHD development plan permits CEQA constraints to be violated.

- BCHD's intent is to use *Programmatic Design* for Phase 2.

LH2-4

In a Programmatic Design procurement, the final details for a subsequent phase of a multi-phase procurement are not specified until the preceding phase is underway. BCHD has stated that this procurement method will be used for the HLC.

But so long as these details do not violate any imprecise data limits disclosed in the EIR analyses, they can be *anything*. The public has no resource to object based on CEQA requirements. With the publication of the FEIR, the CEQA process will be completed. All of the defects described above will not have relevance. In effect, Programmatic Design is an end-around that defeats the purpose of CEQA for Phase 2.

-BCHD's intent is to use *Design Build* for Phase 1

Normally, for public construction projects, the procuring agency issues a Request for Proposal (RFP), and interested contractors submit cost bids for doing the specified work – including what must be accomplished as specified in the Final Environmental Impact (FEIR) report .

LH2-5

In theory, therefore, whatever is built for Phase 1 will be done so under the environmental constraints. CEQA safeguards will be adhered to. This is called the Design-Bid-Build (DBB) process.

BCHD's intent, however, is to attract an investment partner based on what is called the Design Build (DB) process. It has a dispensation from using DBB until the end of 2022.

In the Design Build process, if a problem comes up or a change is requested, the procurer and the contractor can negotiate changes in the contract before going forward.

This leeway, allows any and all environmental impact constraints specified in the FEIR to be completely sidestepped by the procurer and contractor merely deciding to do so. In effect, Design Build is an end-around that defeats the purpose of CEQA for Phase 1.

LH2-6

\* In summary, the HLC Master Plan has been constructed so that the entire CEQA process becomes merely a “check-the-box” exercise that allows BCHD to do exactly whatever they want to do in their sandbox.

The DEIR must be withdrawn and these deficiencies remedied.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:16 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Draft Proposal

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**From:** Jim Burschinger <brschngr@yahoo.com>  
**Sent:** Wednesday, May 26, 2021 7:03 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Draft Proposal

To Whom It May Concern:

MB1-1 | Do not move forward. Not beneficial to our community. Too expensive and detrimental to our community to build. Too expensive to live in proposed units. No, do not move forward!

M. Burschinger

Regards,  
M.

Sent from my iPhone

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:41 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Comment to BCHD DEIR

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**From:** Marcia Gehrt <marciagehrt@gmail.com>  
**Sent:** Tuesday, June 8, 2021 11:09 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Public Comment to BCHD DEIR

The mission statement for BCHD includes phases including focusing on preventative health and wellness programs. It was designed to promote services aimed at prevention of chronic yet preventable diseases.

MCG-1 Yet this expansion project does not focus on any of those concerns. But rather is a profit center for an outside company building a behemoth assisted living project. It is even more apparent when the gym and workout classrooms are not even being considered until phase 2 of the project and only if there are funds available. Dangling these carrots such as a pool is very misleading.

MCG-2 In the previous zoom meeting held on Tuesday, April 13th, the representative from Wood Environmental stated that there was no way to mitigate the noise from the project. For the five years that the project will be under construction, noise levels would be exceeded. There is one way to mitigate this problem for the residents who live immediately adjacent to this project and that is to revamp the concept and negate the removal of the buildings. This would also  
MCG-3 solve the problem with asbestos, lead, and all the other pollutants that would be released to the community and jeopardize the health of elementary school children attending Towers School.

MCG-4 All over Los Angeles, condominiums and apartments are implementing earthquake preventative measures instead of tearing them down for these very reasons. They are installing moment frames and securing the buildings at the same time as other renovations. This could certainly be done at this location. The gym could be enlarged and other programs  
MCG-5 designed to allow people like ourselves to stay in their homes rather than expensive assisted living facilities. This is what older people desire. This project is at the core, a direct contrast to what BCHD was intended. Greed and profits has taken over and it is the communities' obligation to stop this project.

MCG-6 We are directly opposed to this overdevelopment project.

Marcia and Carl Gehrt  
19935 Redbeam Ave.  
Torrance, Ca 90503

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 11:47 AM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD Healthy Campus - OPPOSE

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**From:** marcieguillermo@aol.com <marcieguillermo@aol.com>  
**Sent:** Wednesday, March 24, 2021 2:16 PM  
**To:** Communications <Communications@bchd.org>  
**Subject:** BCHD Healthy Campus - OPPOSE

Good Afternoon Members of the Board,

This email is to **STRONGLY** oppose this "DRAFT" EIR and project for all the reasons indicated by many residents since the inception of this project.

MG1-1

Not sure why, the Board is going with this "DRAFT" EIR, when the Board and BCHD Management have not addressed the concerns of the residents.

MG1-2

The land is owned by the residents, and it is intended for **public use for the large community**. It is not intended to benefit a few and BCHD Management at the expense of the greater majority of residents.

MG1-3

It is pretty obvious that the project is **NOT compatible with surrounding neighborhoods**. It is a family-oriented neighborhood. This proposed building will be visible from a distance and will tower over the existing housing. Compare it to the existing height of the main library on PCH. RCFE buildings will be better served if placed next door to hospitals or within their campuses.

MG1-4

I also have a problem that BCHD is BOTH the Lead Agency and Certifier/Approver of its own EIR. Yes, **BCHD is BOTH the Lead Agency and Certifier/Approver of its own EIR**. Kind of like the **Fox guarding the Henhouse**. Why BCHD has chosen to avoid going to the taxpayer/owners and chose "development" for funding phase I? However, If they go with Phase II, BCHD may go with a bond to fund it.

MG1-5

To make things even worse, the housing numbers provided through the proposed RCFE are not included when our city RHNA housing numbers are calculated. Please **keep this point in mind too**.

MG1-6

Please oppose the DEIR.

Respectfully,

Marcie Guillermo  
Redondo Beach Resident



## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:53 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Healthy Living Campus

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**From:** marcieguillermo@aol.com <marcieguillermo@aol.com>  
**Sent:** Thursday, June 10, 2021 1:46 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Healthy Living Campus

Hello EIR Members,

The draft EIR **fails** to do a decent alternative analysis to the proposed project.

Could you provide the analysis for the following alternatives keeping in mind the concerns of the community?

Alternative 1 – No Project Alternative

MG2-1 Alternative 2 – Sale and Redevelopment of the BCHD Campus

Alternative 3 – Revised Access and Circulation

Alternative 4 – Phase 1 Preliminary Site Development Plan Only

Alternative 5 – Relocate Center for Health and Fitness Permanently and Reduced Parking Structure Size.

Alternative 6 – Reduce Height Alternative

MG2-2 For alternative 1, I believe the DEIR **proposes** a “demolish and replace with limited open space” project. Isn't the goal of no alternative project to leave the site as is? Why would you add a “demolish and replace with limited open space”?

MG2-3 For alternative 6, it would be best to keep the height of any construction at a height consistent with the surrounding neighborhoods and schools. Have you seen Manhattan Beach proposed adult living building's height? **Why would it be different for Redondo?**

This huge white elephant “healthy living campus” does not belong on that site surrounding by schools and residential area. It belongs close to existing hospitals corridors or main corridors.

MG2-4 We need a healthy campus for the entire community, not what the BCHD is proposing.

Thanks,

Marcie Guillermo, Pharm.D.  
Redondo Beach Resident.

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:41 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BSHD

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**From:** Maren Blyth <marenblyth@msn.com>  
**Sent:** Wednesday, June 9, 2021 9:02 AM  
**To:** EIR <eir@bchd.org>  
**Subject:** BSHD

MB2-1 I live in Hermosa Beach and I pay taxes for the Beach Cities Health District – I am opposed to the Current project!!!! This Project converts a public enterprise into a private enterprise (the Sr. living center) It's not yours to give away!!! It's mine!!! Also, I am a member of the Health Club at Beach Cities – as I understand the project, the Health Center Building will be knocked down and rebuilt "if funds are available".....there are no plans to obtain these funds!!! And, my suspicion is that there will never be any funds!!! So, there goes my Health Club and all the other valuable and educational services that are available to me now!!!

MB2-2  
MB2-3 This whole project should be DROPPED now!!!

Maren Blyth

Sent from [Mail](#) for Windows 10

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:35 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD Project Concerns

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**From:** Maria Schneider <mas2021removals@gmail.com>  
**Sent:** Sunday, June 6, 2021 7:11 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** BCHD Project Concerns

Dear BCHD Project Planners,

MS-1 | I wish to vehemently express my sincere opposition to the proposed massive Assisted Living Facility and the concern for health impact on nearby residents and school-aged children!

MS-2 | My elderly parents live below the proposed building site as well as children who frequent the parks and schools. I know a few long-time residents that have lung-related conditions. I am concerned for the respiratory and overall health given the demolition and construction and the known and yet unknown effects to air quality, water quality, increased pollutants, soil erosion, traffic congestion.....

MS-3 | Inconveniences of traffic/truck and noise concerns aside, I would like to know how the overall impact of the breeze and pollution on the air, water and soil quality is addressed for those with already compromised respiratory, defense mechanism, and those still growing?

Opposed and concerned resident!  
Maria Schneider

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 11:31 AM  
**To:** Meisinger, Nick  
**Subject:** Fw: Please review/correct Table ES-2. Impact Comparison of Alternatives to the Proposed Project

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Wednesday, March 10, 2021 5:46 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Please review/correct Table ES-2. Impact Comparison of Alternatives to the Proposed Project

MN1-1|It has 5 alternatives in the Table, yet there are 6 on the prior page.

**Subject:** RE: PRR #278 - Manhattan Realty - Formal Objection

---

**From:** Mark Nelson (Home Gmail) <[menelson@gmail.com](mailto:menelson@gmail.com)>

**Sent:** Monday, March 22, 2021 4:55 PM

**To:** PRR <[PRR@bchd.org](mailto:PRR@bchd.org)>

**Subject:** Re: CPRA - Manhattan Realty - Response

MN2-1 | This is a formal objection to BCHDs response. BCHD indicates in its DEIR that it is not acquiring land, therefore, there is no acquisition underway, or, BCHD has made a material misrepresentation in its DEIR.

On Mon, Mar 22, 2021 at 4:31 PM PRR <[PRR@bchd.org](mailto:PRR@bchd.org)> wrote:

Mark,

Please see below for the District's response (in red) to your public records request dated 2/24/21 that reads:

Provide all work products purchased from Manhattan Realty related to the HLC or land appraisals at the BCHD campus.

This request seeks records exempt from disclosure by the California Public Records Act. Cal. Gov. Code Sec. 6254(h) provides exemptions for certain documents, including **"the contents of real estate appraisals, engineering or feasibility estimates, and evaluations made for or by the state or local agency relative to the acquisition of property, or to prospective public supply and construction contracts, until such time as all of the property has been acquired or all of the contract agreements obtained."** Your request seeks these documents, as such, the documents remain rightly retained by the District.

If you believe we have not correctly interpreted your request, please resubmit your request with a description of the identifiable record or records that you are seeking.

As a reminder, to date (2019-2021), the District has responded to approximately 218 emails containing approximately 472 individual requests/questions from you. Of the 472 individual request/questions received from you, 367 have been closed/answered, 28 have been withdrawn by you and 77 remain open. The District has determined that your numerous requests for public documents will impose an excessive burden on the District's limited staff and resources, thereby disrupting its ability to provide due attention to its primary government functions. Several of your most recent requests are overly extensive, over-broad, vague, and in many cases unlimited in time and scope. The District'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. Despite the cumulative impact of your limitless and increasing requests imposing an undue burden on the District, we continue to respond to your requests.

**Covid-19 disclaimer:**

Please also note that the District is currently operating under its emergency protocols, which require reallocation of resources to meet the critical needs of the community at this time. As a result, the District's responses to certain public records requests may require more time than normal. We apologize for the inconvenience, and are committed to working with the public to provide all requested information as soon as reasonably possible.

**From:** Mark Nelson (Home Gmail) <[menelson@gmail.com](mailto:menelson@gmail.com)>

**Sent:** Wednesday, February 24, 2021 11:27 AM

**To:** Charlie Velasquez <[Charlie.Velasquez@bchd.org](mailto:Charlie.Velasquez@bchd.org)>

**Subject:** CPRA - Manhattan Realty

Provide all work products purchased from Manhattan Realty related to the HLC or land appraisals at the BCHD campus.

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 11:48 AM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Comments to Mayor and Councils, Redondo Beach, Hermosa Beach, and Manhattan Beach for Upcoming Council Meetings

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Monday, March 22, 2021 9:10 PM  
**To:** Itamura@cityymb.info; cityclerk@redondo.org; CityClerk@torranceca.gov  
**Cc:** Communications <Communications@bchd.org>  
**Subject:** Public Comments to Mayor and Councils, Redondo Beach, Hermosa Beach, and Manhattan Beach for Upcoming Council Meetings

Dear Mayors and Councils:

As the "owners" of Beach Cities Health District, I am communicating with you as both a 3+ year BCHD volunteer and as a property owner adjacent to BCHD.

Despite repeated lip service by BCHD of listening to the neighborhood, the revised BCHD 2020 campus plan is both TALLER and has more SQUARE FEET of surface buildings than did their 2019 proposal that drew over 1,200 surrounding residents to launch and sign a petition to downsize the proposal consistent with the surrounding residential neighborhoods that have 30 foot or lower maximum heights.

BCHD increased the height of their project from 60-feet, as stated in their EIR Notice of Preparation (NOP) in 2019 to 103-feet in their draft EIR. Surely that is not responding to neighbors seeking consistent sizing with the neighborhoods.

Further, BCHD removed 160,000 sqft of underground parking from their 2019 plan, and moved it to an 800-car parking ramp that could be between 8 and 10 stories according to BCHD's 2020 Draft EIR document. Again, that is surely not the response that residents expected. BCHD claims to have had over 1,300 comments. Given that 1,200 signatures came in on a single petition, and that over 150 comments were provided to their EIR NOP, and that over 100 comments were made on June 17, 2020 when BCHD provided only 3 business days for public input on their 2020 plan, I can only assume that BCHD discards comments that it disagrees with in order to arrive at its contrived 1,300 comment value.

In summary, BCHD **increased** the proposed height from 60-feet to 103-feet, and BCHD **increased** the proposed above ground square feet from 729,000 to 793,000 sqft, including an 8-10 story ramp at Prospect and Diamond. I ask that you rein in our wildly out of control local agency and force them to provide the surrounding neighborhood with a structure, like The Kensington, the meets the neighbor uses and does not negatively impact several thousand people for decades and generations. We have already suffered the environmental and economic injustice impacts of the failed South Bay Hospital that at least provided us with local emergency room services as a quid pro quo for the sirens, traffic, noise, air emissions, glare, excessive night time lighting, reduced home values and other negative impacts.

Mark Nelson  
3+ year BCHD Community Working Group volunteer  
Redondo Beach property owner

cc: BCHD Board



# BCHD INCREASED BOTH THE HEIGHT AND ABOVE GROUND AREA OF ITS PROPOSED OVERDEVELOPMENT FROM 2019 to 2020

2019 PLAN



**Total Height: 60-feet**

**Total SqFt Above Ground 729,700 sf**

2020 PLAN



**Total Height: 103-feet  
+53 Ft Tall**

**Total SqFt Above Ground 792,520 sf  
+62,820 SqFt of Above Ground**

## What BCHD CEO Bakaly CLAIMED

"For the past three years we've collected more than 1,300 public comments during more than 70 meetings and worked with financial, construction and environmental experts to minimize impacts on local neighborhoods."

"We think it's more consistent with what we were hearing," Bakaly said. "We are a public agency, so we do want to be listening."

## What BCHD DID

**Increased** the height of the overdevelopment from 60-feet to 103-feet **(+88% INCREASE)**

**Increased** the SqFt of above ground buildings by **+62,820 sf**

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 11:34 AM  
**To:** Meisinger, Nick  
**Subject:** Fw: Board Comment - False Statement on Website

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Wednesday, March 24, 2021 7:39 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Fwd: Board Comment - False Statement on Website

It is simply FALSE to suggest that the project was downsized in total. It was instead increased from 60-feet in the 2019 plan to 103-feet in the 2020 plan. The square footage of surface buildings was INCREASED because 160,000 sqft of underground parking was moved to surface buildings. This is being filed as an Attorney General complaint for false advertising.

----- Forwarded message -----

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Date:** Wed, Mar 24, 2021 at 6:07 PM  
**Subject:** Board Comment - False Statement on Website  
**To:** Communications <communications@bchd.org>  
**Cc:** <martha.koo@bchd.org>, <vanessa.poster@bchd.org>, <noel.chun@bchd.org>, <jane.diehl@bchd.org>, <michelle.bholat@bchd.org>

BCHD admits it raised the height from 2019 to 2020 from 60-feet to 103-feet. BCHD however persists in a FALSE CLAIM regarding the sqft of buildings it plans to develop.

BCHD states:

Smaller Building Sizes: Reducing the square footage of the new buildings from 423,000 sf to 253,700 sf; with plans to shift them farther from adjacent homes;

The statement is deliberately misleading. After BCHD moves 160,000 sqft of subterranean parking to the surface ramp, BCHD will be constructing MORE sqft of surface buildings. BCHD must retract its false claim and this will be provided to the local cities and the new state AG.

PROGRAMMATIC AREA	2019 MASTER PLAN	THE MASTER PLAN	DIFFERENCE
<b>BUILDING AREA</b>			
510 NORTH PROSPECT (E)	0	52,000	52,000
520 NORTH PROSPECT (E)	47,700	47,700	0
<b>TOTAL (E) OCCUPIED BUILDING AREA TO REMAIN</b>	<b>47,700</b>	<b>99,700</b>	<b>52,000</b>
HOUSING = ASSISTED LIVING + MEMORY CARE	423,000	253,700	-169,300
ASSISTED LIVING	393,000	203,700	-189,300
MEMORY CARE	30,000	50,000	20,000
PACE	0	14,000	14,000
COMMUNITY SERVICES	6,270	6,270	0
YOUTH WELLNESS CENTER	0	9,100	9,100
WELLNESS AND HEALTH CLUB	74,000	81,150	7,150
WELLNESS DIVISION	55,000	53,150	-1,850
CENTER FOR HEALTH AND FITNESS	19,000	20,000	1,000
AQUATIC CENTER	0	24,000	24,000
CHILD DEVELOPMENT CENTER	10,000	0	-10,000
SERVICE / BACK OF HOUSE	51,730	9,100	-42,630
<b>TOTAL NEW OCCUPIED BUILDING AREA</b>	<b>545,000</b>	<b>373,320</b>	<b>-171,680</b>
<b>TOTAL OCCUPIED BUILDING AREA</b>	<b>592,700</b>	<b>473,020</b>	<b>-119,680</b>
<b>PARKING AREA</b>			
TOTAL (E) PARKING STRUCTURE AREA TO REMAIN	27,000	27,000	0
<b>TOTAL NEW PARKING STRUCTURE AREA</b>	<b>270,000</b>	<b>292,500</b>	<b>22,500</b>
<b>TOTAL PARKING STRUCTURE AREA</b>	<b>297,000</b>	<b>319,500</b>	<b>22,500</b>
<b>DEVELOPED AREA</b>			
<b>TOTAL NEW DEVELOPED BUILDING AREA</b>	<b>815,000</b>	<b>665,820</b>	<b>-149,180</b>
<b>TOTAL DEVELOPED BUILDING AREA</b>	<b>889,700</b>	<b>792,520</b>	<b>-97,180</b>

**Above Ground  
Under Ground**

**Note: 2019 had 160,000 sq ft of space to a surface ramp in 2020 at the 520 MOB, so it is un**

**62820**

Comparative Space Program Table  
2019 Master Plan/ 2021 Phase I Proposed Project & Phase II Example A

## Sources

2019 Surface Building SQFT: BCHD 2019 EIR Notice of Preparation, pages 13-14  
 2019 Height: BCHD 2019 EIR NOP, page 18  
 2020 Surface Building SQFT: BCHD 2020 DEIR HLC Master Plan, page 221  
 2020 Height: BCHD DEIR, page 2-27

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 11:34 AM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD was not the LEAD AGENCY for 510 or 520 MOBs

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Wednesday, March 24, 2021 8:54 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** BCHD was not the LEAD AGENCY for 510 or 520 MOBs

MN5-1 | BCHD elected to be the lead agency for this HLC in order to assure that it could self-certify. The inconsistency is de facto evidence of BCHDs malintent.

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 11:34 AM  
**To:** Meisinger, Nick  
**Subject:** Fw: Resolution of Wood PLC Bribery Scandal

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Wednesday, March 24, 2021 9:12 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Resolution of Wood PLC Bribery Scandal

Because Wood PLC is the author of the DEIR, I believe it is important to understand the resolution of Wood PLCs bribery scandal in order to judge the veracity of the Wood PLCs work.

<https://www.complianceweek.com/anti-bribery/john-wood-group-reserves-46m-to-resolve-bribery-investigations/28598.article>

MN6-1

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 11:35 AM  
**To:** Meisinger, Nick  
**Subject:** Fw: Continuation of Wood PLC on the Wreckers of the Earth List

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Wednesday, March 24, 2021 9:18 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Continuation of Wood PLC on the Wreckers of the Earth List

Because Wood PLC is the author of the DEIR, I believe it is important to understand whether or not Wood PLC remains on the CorporateWatch.org Wreckers of the Earth list in order to judge the veracity of the Wood PLCs work

<https://corporatewatch.org/wreckers-of-the-earth-london-company-directory/>

MIN7-1



## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 11:35 AM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD and PCE Contamination - BCHD higher standards of health and safety require excavation

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, March 25, 2021 10:48 AM  
**To:** EIR <eir@bchd.org>  
**Cc:** Communications <Communications@bchd.org>  
**Subject:** BCHD and PCE Contamination - BCHD higher standards of health and safety require excavation

BCHD asserts in other comments that it is held to a higher standard of health and safety impact than ordinary businesses as represented by CEO Bakaly with the entire Board of Directors present and without objection on March 24, 2021 in a public meeting.

As a result of BCHD use of higher standards, BCHD must remediate the PCE contamination using the most effective decontamination methods, not merely "fans" as was asserted by Wood PLCs representative.

The gold standard for PCE decontamination is excavation.

According to US EPA:

Excavation is a proven remedial alternative that has applicability in the remediation of a variety of contaminants because it involves the removal and transport of impacted soils to an off-site treatment and/or disposal facilities. Pre-treatment of the contaminated media may be required to meet land disposal restrictions or may be performed to reduce disposal costs. Excavation is typically deployed to remove shallow source areas that are less than 10-15 feet below land surface (ft bis) but can be implemented at greater depths with additional considerations. Excavation adjacent to and beneath buildings can be technically and logistically challenging as can excavation at depth (i.e., greater than 10 ft bis), into groundwater, and in poor quality soils (i.e., silts, sands, etc.). For example, excavation near buildings may (i) require the use of temporary shoring to facilitate the excavation and protect building integrity and (ii) significantly disrupt operations at active facilities. Excavation at depth may require shoring systems to (i) control excavation dimensions and stability or (ii) sloping or benching of excavations that can significantly increase the size of excavation areas. Groundwater in or in close proximity to excavations may require dewatering systems and the subsequent management of additional waste streams. Poor quality soils can exacerbate the technical challenges of excavation by requiring more robust shoring systems or additional sloping or benching of excavations.

Mark Nelson

Redondo Beach Property Owner  
3+ Year BCHD Volunteer - Community Working Group  
Public Record Comment to the BCHD DEIR  
[menelson@gmail.com](mailto:menelson@gmail.com)



## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 11:36 AM  
**To:** Meisinger, Nick  
**Subject:** Fw: DEIR Comment - missing PRR makes evaluation of Scenarios impossible

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, March 25, 2021 4:39 PM  
**To:** EIR <eir@bchd.org>  
**Cc:** Communications <Communications@bchd.org>; cityclerk@redondo.org <cityclerk@redondo.org>; CityClerk@torranceca.gov <CityClerk@torranceca.gov>; cityclerk@citymb.info <cityclerk@citymb.info>; cityclerk@hermosabeach.gov <cityclerk@hermosabeach.gov>  
**Subject:** DEIR Comment - missing PRR makes evaluation of Scenarios impossible

BCHD has failed to answer the PRR listed below in a timely fashion. As such, BCHDs DEIR objectives, preferred project, and active and rejected alternatives cannot be intelligently evaluated by the public.

MN9-1 12/7/2020	Provide the model and all assumptions used to determine: 1) It is more cost-effective to conduct seismic retrofit on 514 than to proceed with alternative uses to end-of-life 2) It is more cost-effective to demolish 514 and proceed with rebuilding than to defer that action Provide all cost-of-capital and discount rate assumptions, along with probability weighting of scenarios.
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FYI: Redondo Beach, Hermosa Beach, Manhattan Beach, and Torrance Mayors and City Councils

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 11:36 AM  
**To:** Meisinger, Nick  
**Subject:** Fw: DEIR Comment - BCHD refusal to provide open space requirement computations

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, March 25, 2021 4:49 PM  
**To:** EIR <eir@bchd.org>  
**Cc:** Communications <Communications@bchd.org>; cityclerk@redondo.org <cityclerk@redondo.org>; citycouncil@hermosabeach.gov <citycouncil@hermosabeach.gov>; CityClerk@torranceca.gov <CityClerk@torranceca.gov>; CityCouncil@citymb.info <CityCouncil@citymb.info>  
**Subject:** DEIR Comment - BCHD refusal to provide open space requirement computations

BCHD has failed to answer the PRR listed below. As such, BCHDs DEIR objectives, preferred project, and active and rejected alternatives cannot be intelligently evaluated by the public. BCHD has indicated in its alternatives that it may increase the footprint of the RCFE, thereby likely reducing the open space. In any event, intelligent participation is blocked by BCHD despite the fact that it has published open space in its DEIR and refuses to provide any fact basis.

2. As the open space was reduced from 3.6 acres in the 2019 "Great wall of Redondo Plan" to the current proposed 2.45 acres, provide documents demonstrating that the space cannot be further reduced. If no documents, state such.

The District has previously responded to your prior request regarding open space. Design drafts pertaining to proposed open space are derived internally and with consultants and remain properly withheld pursuant to the deliberative process privilege, as discussed in the context provided in the original response below.

If you believe we have not correctly interpreted your request, please resubmit your request with a description of the identifiable record or records that you are seeking.

FYI: Redondo Beach, Hermosa Beach, Manhattan Beach, and Torrance Mayors and City Councils

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 11:36 AM  
**To:** Meisinger, Nick  
**Subject:** Fw: DEIR Comment - failure to provide an accurate, stable, and finite project description

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, March 25, 2021 7:24 PM  
**To:** EIR <eir@bchd.org>  
**Cc:** Communications <Communications@bchd.org>  
**Subject:** DEIR Comment - failure to provide an accurate, stable, and finite project description

I have been informed by several members of the public of their concerns regarding the "BEACH CITIES HEALTH DISTRICT HEALTHY LIVING CAMPUS MASTER PLAN MARCH 8, 2021 (DRAFT) PAUL MURDOCH ARCHITECTS."

MN11-1 I concur with them, that It is difficult to conceive of a draft document providing the needed certainty for intelligent participation by the public. By failing to provide an accurate, stable and finite project description, the public is forced to spend excess time and money evaluating a draft.

Absent a final work product, intelligent public participation is thwarted.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 11:38 AM  
**To:** Meisinger, Nick  
**Subject:** Fw: DEIR Comment - Lack of Seismic Response

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Friday, March 26, 2021 10:33 AM  
**To:** EIR <eir@bchd.org>  
**Cc:** Communications <Communications@bchd.org>  
**Subject:** DEIR Comment - Lack of Seismic Response

40 days ago the CPRA request was filed with BCHD. Absent timely response, the public's right to intelligent participation in the CEQA process has been denied.

---

**From:** Mark Nelson (Home Gmail) <[menelson@gmail.com](mailto:menelson@gmail.com)>  
**Sent:** Tuesday, February 16, 2021 12:36 AM  
**To:** Charlie Velasquez <[Charlie.Velasquez@bchd.org](mailto:Charlie.Velasquez@bchd.org)>  
**Subject:** CPRA - Seismic

Provide documentation of all structural seismic damage to 514 N Prospect from 1960 to 2020, if none, state none.  
Provide documentation of any human injury or fatality caused by seismic failure of 514 N Prospect from 1960 to 2020, if none, state none.  
Provide the estimated cumulative probability of a seismic event exceeding the design specification of 514 N Prospect from 1960 to 2020. If this has not been computed, state none.  
Provide the estimated cumulative probability of a seismic event exceeding the design specification of 514 N Prospect from 2021 to 2040. If this has not been computed, state none.

MN12-1

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 11:48 AM  
**To:** Meisinger, Nick  
**Subject:** Fw: DEIR Process Question

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Monday, March 29, 2021 6:35 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** DEIR Process Question

MN13-1 | BCHD distributed the draft EIR and Master Plan concurrently. Is the Master Plan incorporated into the DEIR such that comments will be accepted on the Master Plan as well?

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 11:58 AM  
**To:** Meisinger, Nick  
**Subject:** Fw: Comment on BCHD DEIR - Failure to provide CPRA responses after 9 months

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Friday, April 2, 2021 10:49 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Comment on BCHD DEIR - Failure to provide CPRA responses after 9 months

On June 16, 2020, the following Public Record Act requests were put to BCHD:

18. Provide all analyses that consider downsizing of the BCHD.
19. Provide all 514 "expenses" as claimed by Monica and Bakaly that exist in the long term forecast.
20. Provide the reasons that each 514 expense above cannot be further deferred if the 514 building is abandoned in place.

To date, BCHD has not replied to them. As such, one can only assume that BCHD is falsely claiming that the future expenses of the 514 building are valid. As the future expenses are not valid, and the " need" for seismic retrofit or demolition is invalid, BCHD, as a public agency with fiduciary responsibility to taxpayers, does not have a valid Purpose and Need for its project.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 11:59 AM  
**To:** Meisinger, Nick  
**Subject:** Fw: DEIR VIS - 1 misrepresents the "highpoint" of the view ridge of Palos Verdes from Hermosa and Redondo Beach.

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Sunday, April 4, 2021 10:33 PM  
**To:** EIR <eir@bchd.org>  
**Cc:** Communications <Communications@bchd.org>; Martha Koo <Martha.Koo@bchd.org>; Noel Chun <Noel.Chun@bchd.org>; Michelle Bholat <Michelle.Bholat@bchd.org>; Jane Diehl <Jane.Diehl@bchd.org>; Vanessa I. Poster <Vanessa.Poster@bchd.org>; cityclerk@redondo.org <cityclerk@redondo.org>; CityClerk@torranceca.gov <CityClerk@torranceca.gov>; cityclerk@citymb.info <cityclerk@citymb.info>; Brandy Forbes <brandy.forbes@redondo.org>; cityclerk@hermosabeach.gov <cityclerk@hermosabeach.gov>  
**Subject:** DEIR VIS - 1 misrepresents the "highpoint" of the view ridge of Palos Verdes from Hermosa and Redondo Beach.

BCHD Board Public Comment and DEIR Comment  
PUBLIC COMMENT for Hermosa, Manhattan, Redondo and Torrance Mayors and Councils, Torrance and Redondo Planning Commissioners

The following BCHD statement is a misrepresentation of the appropriate "highpoint" for use with VIS-1. It is correctly the view from 190th & Prospect, not from 190th & Flagler.

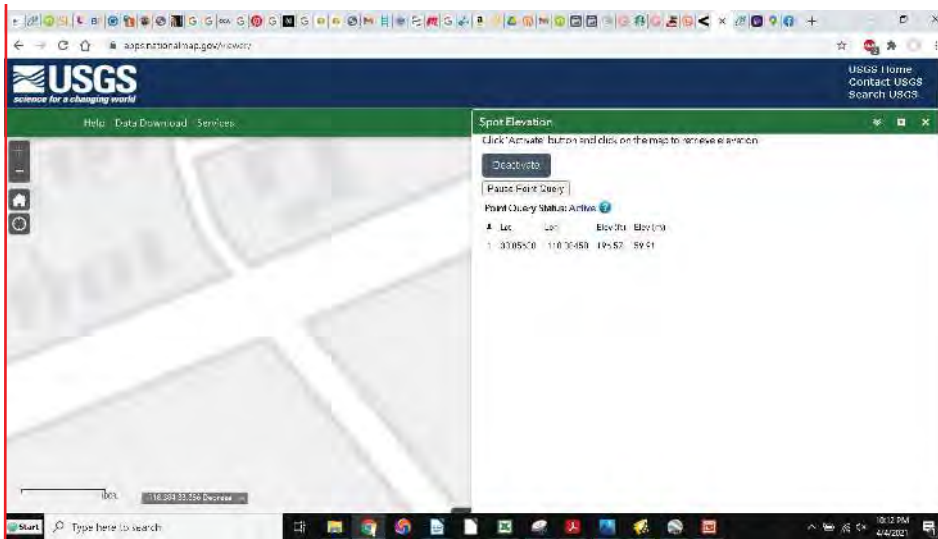
BCHD VIS-1 in total is:

"Impact VIS-1 The proposed Residential Care for the Elderly Building included in the 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."

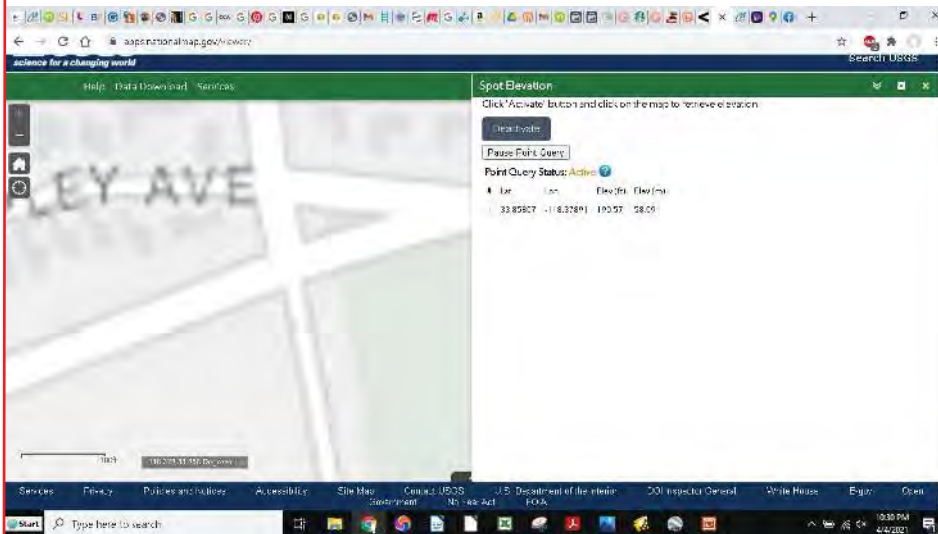
190th & Prospect according to USGS is 6-feet higher than 190th & Flagler and is the appropriate KVL for assessing the interruption of Palos Verdes scenic local views. The interruption of the PV view is much more severe from 190th & Prospect and the proposed mitigation for 190th & Flagler is insufficient. Below is USGS data, as well as, simulations of the extreme and significant view interruptions proposed by BCHD for both locations. By simple visual inspection, it is apparently that the impacts from 190th & Prospect are much greater, although both impacts are significant.

190th & Prospect - USGS - 196.57 ft

#	Lat	Lon	Elev (ft)	Elev (m)
1	33.85620	-118.38458	196.57	59.91

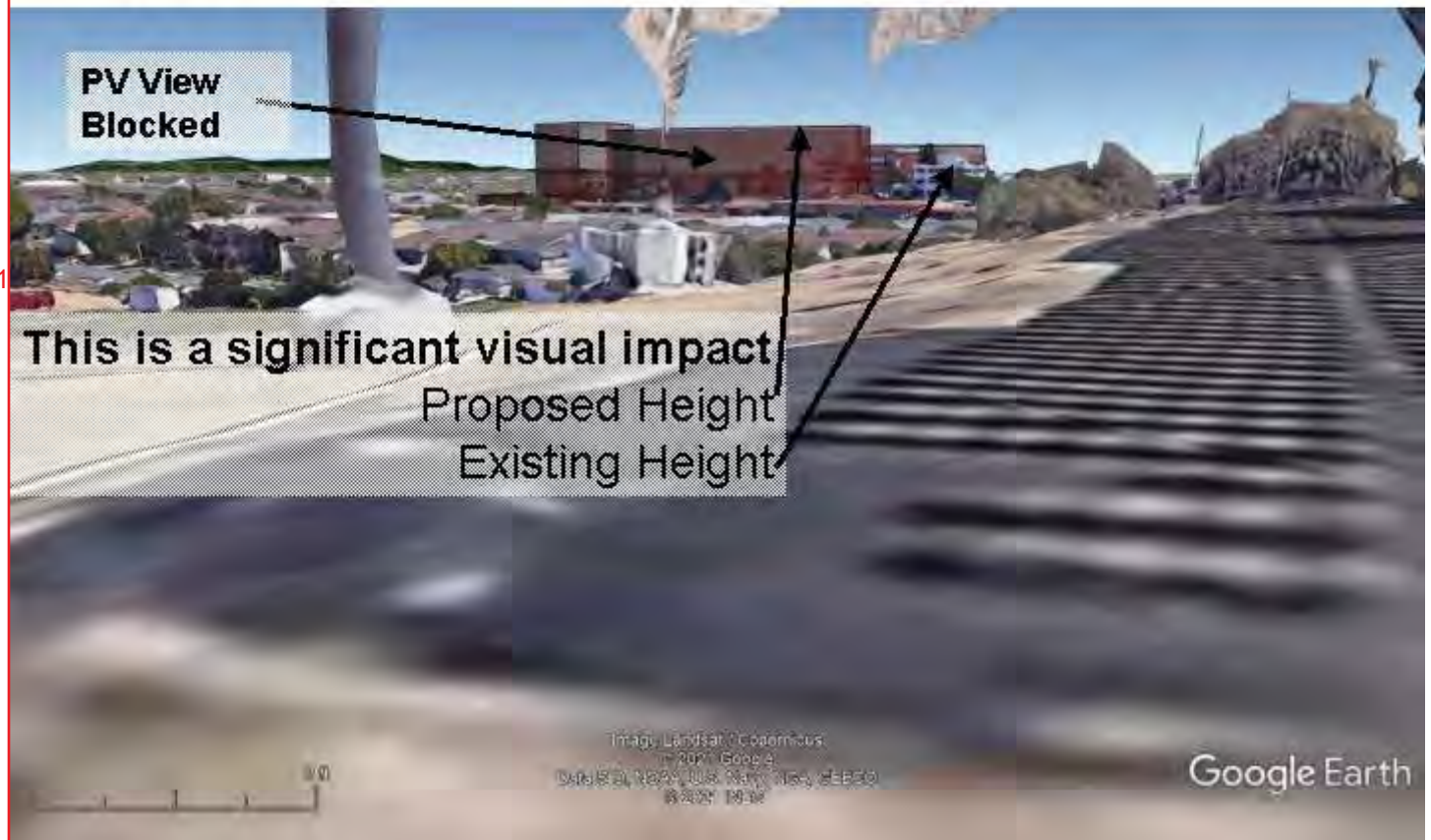


MN15-1190th & Flagler - USGS - 190.57 ft  
 (cont.) #LatLonElev (ft)Elev (m)  
 33.85807 -118.37891 190.57 58.09



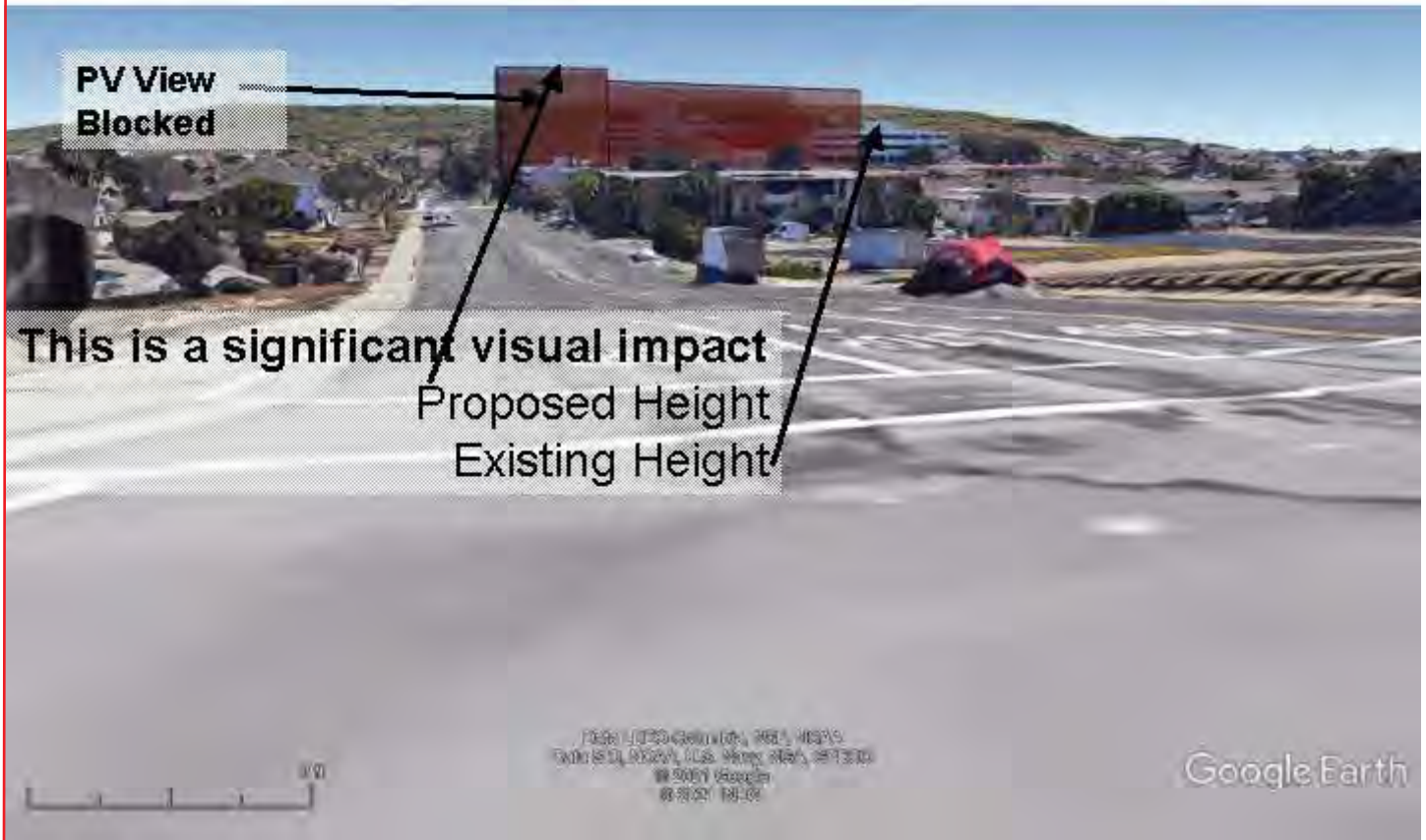


# Visual Simulations of BCHD Proposed View-block Maximizing Perimeter Construction – 190<sup>th</sup> & Prospect



# Visual Simulations of BCHD Proposed View-block Maximizing Perimeter Construction – Prospect & Flagler

MN15-1  
(cont.)



cc: PUBLIC COMMENT for Hermosa, Manhattan, Redondo and Torrance Mayors and Councils, Torrance and Redondo Planning Commissioners

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:01 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Board Comment - BCHD Plans to Damage RCFE Seniors by more than \$2.5M Annually

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Sunday, April 4, 2021 11:01 PM  
**To:** Communications <Communications@bchd.org>  
**Subject:** Board Comment - BCHD Plans to Damage RCFE Seniors by more than \$2.5M Annually

BCHD is planning a "market rate" commercially developed RCFE. According to Cain Bros/KeyBanc, the investment bankers for BCHD, the approximately financing rate of the JV will be 4%. According to current bond rates, tax-free, A-rated bonds are current 2.05%, or approximately 1/2 the rate of BCHD proposal. The use of A-rated bonds (a very conservative assumption) will save seniors in the RCFE nearly \$2.5M annually in financing costs alone.

MN16-1

Coupled with non-profit management and operations, the savings could be 2-3 times that amount, resulting in much more affordable RCFE for the 3 beach cities that funded, own and operate BCHD.

A-rated 30-year Muni Bond Rate	2.05% <a href="https://www.fmsbonds.com/market-yields/">https://www.fmsbonds.com/market-yields/</a>
Cain estimated 42-yr Loan Rate	4.00% Cain 6/12/2020 Pg 5, FN#1

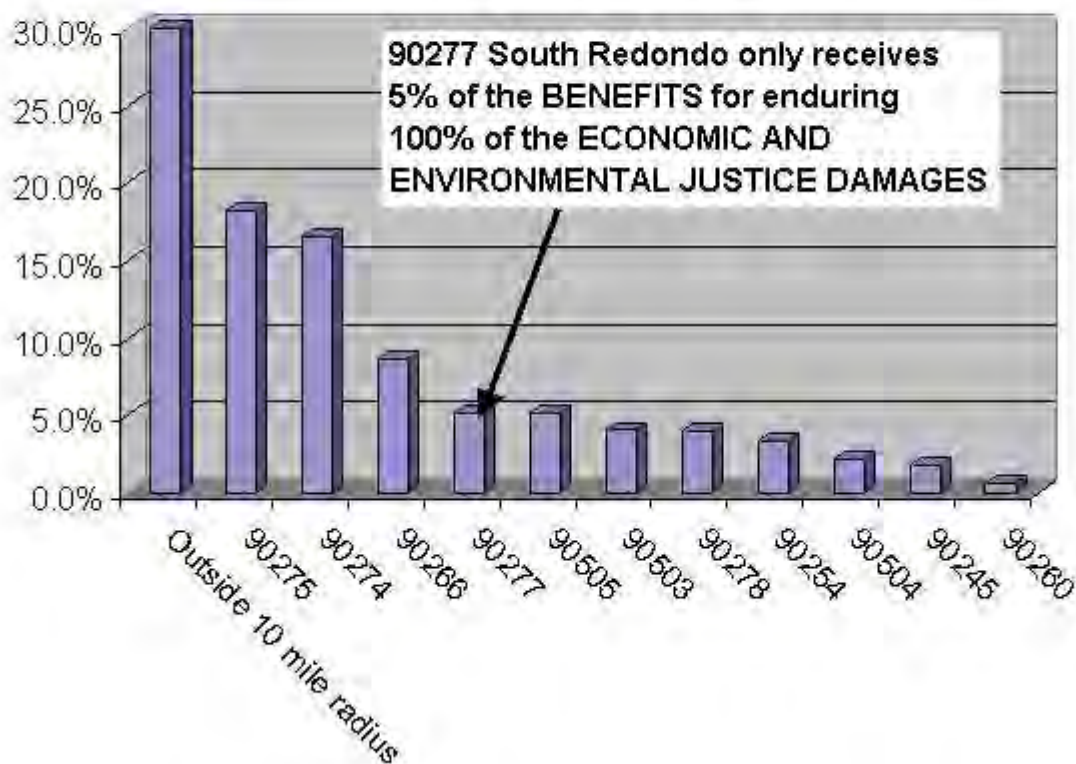
## Navarro, Ashlyn

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:01 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Fiduciary Notice to the Board

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Sunday, April 4, 2021 11:53 PM  
**To:** Communications <Communications@bchd.org>  
**Cc:** Jane Diehl <Jane.Diehl@bchd.org>; Martha Koo <Martha.Koo@bchd.org>; Michelle Bholat <Michelle.Bholat@bchd.org>; Noel Chun <Noel.Chun@bchd.org>; Vanessa I. Poster <Vanessa.Poster@bchd.org>  
**Subject:** Fiduciary Notice to the Board

### BCHD Consultant MDS Targeted Renters for Senior Housing Project are 80% Outside Manhattan, Hermosa, and Redondo Beach that OWN BCHD



The RCFE is permitted by the City of Redondo Beach, not the "beach cities". As a result, 100% of the economic and environmental justice impacts occur in Redondo Beach, while few of the benefits accrue to Redondo Beach

MN17-1  
(cont.) residents. Further, for 60 years, the residents of Redondo Beach have already borne the EJ impacts of the site and operations.

The following is BCHD's consultant's MDS estimate of where tenants will be from:



## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:00 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD: Public Record Requests

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Monday, April 5, 2021 6:39 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Fwd: BCHD: Public Record Requests

Comment for the DEIR record.

----- Forwarded message -----

**From:** Mark Nelson (Home Gmail) <[menelson@gmail.com](mailto:menelson@gmail.com)>  
**Date:** Mon, Apr 5, 2021 at 6:37 PM  
**Subject:** Re: BCHD: Public Record Requests  
**To:** PRR <[PRR@bchd.org](mailto:PRR@bchd.org)>  
**Cc:** Kevin Cody <[kevin@easyreadernews.com](mailto:kevin@easyreadernews.com)>, Lisa Jacobs <[lisa.jacobs@tbrnews.com](mailto:lisa.jacobs@tbrnews.com)>, <[letters@dailybreeze.com](mailto:letters@dailybreeze.com)>, <[letters@latimes.com](mailto:letters@latimes.com)>

MN18-1  
BCHDs lack of cooperation will be submitted as an EIR and Governors OPR comment and disseminated publicly. This is clearly an attempt for BCHD to block intelligent participation of the public. As proponent of the largest commercial real estate development project planned in Redondo Beach, a project that is 150% that of the CenterCal project, it should not be a surprise to BCHD that significant volumes CPRA requests would come your way based on the never before seen DEIR design that was 103-feet tall, following the 60-foot tall design from 2019 that 1,200+ residents complained of regarding its excessive size. BCHD allowed for only 3 business days of input prior to approval on June 17, 2020. BCHD is apparently puzzled that its increase in height from 75-feet in June of 2020 to 103-feet in the DEIR generates CPRA requests? BCHD's demonstrated lack of planning and risk management is pervasive throughout its analysis and is a very strong reason that BCHD should not be allowed to move forward by its taxpayer-owners. The South Bay Hospital failed as a publicly owned entity in 1984 after suffering financially during the 1970s. TMMC and LCM flourished. It seems clear that BCHDs predecessor, SBHD was also a poor fiduciary for the taxpayer-owners.

MN18-2

On Mon, Apr 5, 2021 at 6:10 PM PRR <[PRR@bchd.org](mailto:PRR@bchd.org)> wrote:

Mark,

Between March 8<sup>th</sup> 2021 and April 5<sup>th</sup> 2021, the District received 16 new emails from you containing approximately 25 new requests.

After reviewing your requests, the District has determined that your numerous requests for public documents imposes an excessive burden on the District's limited staff and resources, thereby disrupting its ability to provide due attention to its primary government functions. Several of your most recent requests are overly extensive, over-broad, vague, and in many cases unlimited in time and scope. Many of the requests

are not limited to a certain file or project. Your new requests continue to increase the burden on the District which will necessarily have the impact of further delaying the District's responses.

Over the course of the 15+ months, the District has received and responded in good faith to your numerous public record requests, but the volume, scope and frequency of your requests continue to increase. Since 1/1/20, you have submitted approximately 219 emails containing approximately 451 additional requests/questions on a multiplicity of separate and unrelated topics. Despite the cumulative impact of your limitless and increasing requests imposing an undue burden on the District, we continue to respond to your requests. Since 2019, we have answered approximately 379 requests and 86 remain open. The District'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.

As you know, the District is a small public agency with a relatively small staff. It is operating under emergency protocols due to the COVID -19 crisis. **The District is currently focused on the continued rollout of COVID-19 vaccines.** In light of these special circumstances and the massive scope of your requests over time, the District has determined that it does not have a legal duty to produce the records sought in your most recent requests. This determination is based upon 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. Additional exemptions or privileges may apply based on a review of the records.

Despite this determination and without waiving any privileges, exemptions, or objections to your public record requests, the District will, in its discretion and not as a legal obligation, endeavor to produce responsive non-exempt documents as they can be reasonably identified from your requests within the reasonable capabilities of our staff. The District is willing to work with you to narrow the scope of your overly broad requests so that the search can be focused on documents that are identifiable and can be produced with reasonable effort. This will inevitably take an extended period of time and therefore we cannot set precise dates for completion of this process. The timing and willingness of the District to produce any more documents notwithstanding the undue burden you have imposed on the District will also depend in large part on your willingness to cooperate in limiting and clarifying your requests. The District reserves all rights to cease any further production of documents for the reasons stated herein at any time.

At present, we intend to provide responsive documents for the emails sent between 3/8/20 - 4/5/21 on a **rolling basis** as they are identified. We anticipate that the first documents (for the requests that remain open) will be available by April 30<sup>th</sup>, 2021 **and in some cases, responses have already been provided.**

**As a reminder:** For all comments related to the **DEIR**, please send to [EIR@bchd.org](mailto:EIR@bchd.org).

Thank you.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:02 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Board Comments for 9/23 - Bluezones.com Chronic Stress Damage to Surrounding Neighborhoods by BCHD and SBHD

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Tuesday, April 6, 2021 4:23 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Fwd: Public Board Comments for 9/23 - Bluezones.com Chronic Stress Damage to Surrounding Neighborhoods by BCHD and SBHD

The following comments were submitted to the Board. They are being submitted at DEIR comments. The DEIR appears not to consider Chronic Stress impacts of the project. BCHD paid approximately \$2M for Blue Zones and continues to fund it with staff and expenses. Clearly, BCHD places value on Blue Zones material, millions of dollars of our tax money in value. BCHD however appears to ignore the amount of Chronic Stress that it has already imparted on surrounding neighborhoods, and will impart with its development. Blue Zones refers to chronic stress, such as the past 60+ years of traffic, emissions, sirens, nighttime lighting etc. from the SBH site and BCHD as the "silent killer".

BCHD is obligated to morally obligated to mitigate surrounding chronic stress.

----- Forwarded message -----

**From:** Mark Nelson (Home Gmail) <[menelson@gmail.com](mailto:menelson@gmail.com)>  
**Date:** Sun, Sep 20, 2020 at 10:07 PM  
**Subject:** Public Board Comments for 9/23 - Bluezones.com Chronic Stress Damage to Surrounding Neighborhoods by BCHD and SBHD  
**To:** <[jane.diehl@bchd.org](mailto:jane.diehl@bchd.org)>, <[vish.chatterji@bchd.org](mailto:vish.chatterji@bchd.org)>, <[michelle.bholat@bchd.org](mailto:michelle.bholat@bchd.org)>, <[noel.chun@bchd.org](mailto:noel.chun@bchd.org)>, <[vanessa.poster@bchd.org](mailto:vanessa.poster@bchd.org)>, Communications <[communications@bchd.org](mailto:communications@bchd.org)>  
**Cc:** <[drosenfeld@scng.com](mailto:drosenfeld@scng.com)>, Lisa Jacobs <[lisa.jacobs@tbrnews.com](mailto:lisa.jacobs@tbrnews.com)>, Judy Rae <[easyreader@easyreadernews.com](mailto:easyreader@easyreadernews.com)>

BCHD continues to assert in public that it has, and never has had, any negative impacts on the surrounding neighborhoods, including both BCHD and SBHD. None. (<https://www.bchdcampus.org/faq>)

BCHD needs to review the definitions of and quantification methods for both Environmental and Economic Justice Impacts, using government sources such as EPA.gov. According to CPRA request responses, BCHD has conducted no Environmental Justice nor Economic Justice impact studies on the surrounding neighborhoods, and therefore has NO BASIS to deny that it negatively impacts surrounding neighborhoods.

BCHD also needs to review the definition of and quantification methods for negative externalities, again using government sources.

Clearly, BCHD and SBHD have had, and continue to have, negative impacts on the surrounding neighborhoods that BCHD does not have on far flung areas of Manhattan Beach, Hermosa Beach, or other distant parts of Redondo Beach. BCHD is proposing a development with little to no benefit for the local neighborhoods that will suffer 100% of the negative



externalities, and economic and environmental injustices. For example, only 5% of the target renters are from 90277, while 90277 suffers 100% of the EJ and negative externality burden. **Bluezones acknowledges chronic stress as the SILENT KILLER.**

The surrounding neighborhoods including Beryl Heights and Towers Elementary schools have suffered from the following environmental and economic injustices and negative externalities for over 60 years caused by the location, noise, lighting, pollution and activity of SBH and BCHD, that may include, but are not limited 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.

Due to its DENIAL of the EJ issues, BCHD believes it is ENTITLED to another 50-100 years of economic and environmental injustice impacts and negative externalities on the same neighborhoods that have suffered for 60 years under their regime.

#### **THERE ARE MANY NEGATIVE IMPACT JOURNAL ARTICLES TO CITE -THESE ARE REPRESENTATIVE**

Bluezones.com Chronic Stress is the SILENT KILLER - <https://www.bluezones.com/2012/03/maximize-health-and-longevity-using-these-stress-management-strategies/>

Bluezones.com How Stress Makes Us Sick - <https://www.bluezones.com/2019/05/how-stress-makes-us-sick-and-affects-immunity-inflammation-digestion/>

Stress Response to Alarms and Sirens - <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4918669/>

Stress "damage(s) directly or through functional circuits practically all organs and tissues"  
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5137920/>

Noise "impairs cognitive performance... an increased incidence of arterial hypertension, myocardial infarction, and stroke"  
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3971384/>

Excess outdoor nighttime lighting causes "modifications in human sleep behaviors and also impinge on the daytime functioning of individuals"  
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4863221/>

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:03 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: EVIDENCE BASED SUMMARY REBUTTAL TO CEO BAKALY'S COMMUNITY WORKING GROUP EMAIL

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Tuesday, April 6, 2021 4:36 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Fwd: EVIDENCE BASED SUMMARY REBUTTAL TO CEO BAKALY'S COMMUNITY WORKING GROUP EMAIL

The following is a correction to the BCHD record, as BCHD continues to populate its story of the HLC and the EIR process with misstatements. The comments apply to the impacts of BCHD on the surrounding community.

----- Forwarded message -----

**From:** Mark Nelson (Home Gmail) <[menelson@gmail.com](mailto:menelson@gmail.com)>  
**Date:** Sat, Sep 5, 2020 at 12:40 PM  
**Subject:** EVIDENCE BASED SUMMARY REBUTTAL TO CEO BAKALY'S COMMUNITY WORKING GROUP EMAIL  
**To:** <[cityclerk@redondo.org](mailto:cityclerk@redondo.org)>, <[CityClerk@torranceca.gov](mailto:CityClerk@torranceca.gov)>, Eleanor Manzano <[eleanor.manzano@redondo.org](mailto:eleanor.manzano@redondo.org)>

One September 3rd in an email to the BCHD Community Working Group volunteers, BCHD made a number of assertions requiring rebuttal.

MN20-1 Rather than making the generally off-topic assertions as are found in Tom's note to our CWG, I have provided evidence-based rebuttals in a summary format to demonstrate the problems with BCHDs representation of its project and its denial of BCHDs local area EJ impacts and negative environmental externalities. For simplicity, I left Tom's email format unchanged and included the EVIDENCE-BASE REBUTTAL below each BCHD assertion. I believe it will be a useful format to discuss BCHDs assertions about its most recent campus revision that BCHD allowed only 3 business days for public analysis and input prior to Board approval.

### THE PROJECT IS LARGER (TALLER + MORE SQUARE FEET)

MN20-2 First and foremost, it is disgraceful that the project is overall being represented as smaller by BCHD, when it is 25% taller (75 ft vs 60 ft, 6 & 8-stories vs. 4-stories) and 18% larger with its 800+ car, 8-story parking structure and retention of the 510 building in addition to the new construction yielding an increase in 105,000 square feet over the "Great Wall of Redondo" design from 2019. The new plan is still larger without even counting the retention of 510, however, that would be misleading, as it was torn down in the 2019 plan. Math is a FACT, not an opinion.

### THE PROJECT DESCRIPTION NEEDS TO BE STABLE, ACCURATE AND FINITE FOR THE DEIR ANALYSIS PER CASE LAW

MN20-3 The assertion that a stable, finite, accurate project description is not needed until the Final EIR (FEIR) is contradicted by case law that requires the project description to be stable, finite and accurate for the DEIR analysis in order to facilitate "intelligent public participation". While the BCHD Board seeks political cover by stating that they have not approved a project, it seems impossible for a hypothetical project, or a project that the Board implies may change after the FEIR, to be stable as required by case law. The Board needs to own its decision and quit seeking political cover through

MN20-3 (cont.) obfuscation. It needs to own the fact that it plans to damage the local neighborhoods for another 50-100 years, notwithstanding the prior 60 years of EJ and negative externalities that BCHD denies.

**BCHD CAN'T EVEN PROVIDE THE COSTS OF IT'S 40+ PROGRAMS - IN 25 YEARS IT HASN'T PUT IN SYSTEMS TO TRACK OR BUDGET THEM**

MN20-4 BCHDs statement that it has no accounting systems in place after 25+ years of program delivery for use in evaluating, prioritizing, and ceasing programs is a self-indictment. Imagine how fast you'd be fired at a real business if you answered that in 25 years you failed to provide an accounting or budgeting system to provide the cost-by-product for a mere 40 products? Poster has been on the Board nearly all that time. Boards have a fiduciary obligation to financial oversight that has failed based on BCHDs lack of analysis and systems for programs that spend \$14M of our taxpayer money annually. BCHD also refuses to provide all the PAID invoices for work on the HLC during the same timeframe.

**BCHD HAS A \$7M+ HLC DEVELOPMENT BUDGET YET CAN'T ANSWER PUBLIC REQUESTS TIMELY**

MN20-5 On nearly every late public records response, BCHD claims to be a small agency busy with Covid, but BCHD wasn't too busy to redesign and increase the size of their project during the peak Covid period from March-May while residents of a local assisted living were dying. BCHD also has a \$7M+ HLC development budget that should have fully considered the public's right-to-know, especially when BCHD allowed only 3 business days of public review, analysis and input prior to project approval. On 9/4/2020 BCHD responded to a simple public records act request for copies of an electronic calendar after taking 78 days for completion. This is only one tangible example of their non-performance, there are many more.

**DENYING THE IMPACTS OF CHRONIC STRESS, NOISE, TRAFFIC, POLLUTION, SIRENS, ETC. DOESN'T MAKE THEM GO AWAY OR CHANGE HISTORY**

MN20-6 BCHD uses the classic coal mine owner's defense (we provide workers with a job, store, and housing - why do you care about black lung and your monthly charges that take up 100% of your pay - look at all the benefits we provide you) to ignore its negative impacts on the local neighborhood community. Since the late 1950s when construction started on South Bay Hospital, through last night when emergency vehicles broke the night silence servicing the BCHD campus, the local neighborhood has suffered Environmental and Economic Injustice and negative externalities from the SBHD and BCHD campus. Like the current public discussion of the denial of white privilege, BCHD chooses to DENY its role in damaging the surrounding neighborhoods. After 60+ years of damage, they don't deserve 50-100 years more.

CC: Public comment to the Mayor and Council of Redondo Beach and Torrance

Mark Nelson

3 year volunteer on BCHDs Community Working Group

Redondo Beach property owner

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:03 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Tailpipe pollution (PM 2.5) causes developmental delay, damage and Alzheimer's symptoms in children

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Tuesday, April 6, 2021 4:57 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Fwd: Tailpipe pollution (PM 2.5) causes developmental delay, damage and Alzheimer's symptoms in children

DEIR comment on negative impacts to student health.

----- Forwarded message -----

**From:** Mark Nelson (Home Gmail) <[menelson@gmail.com](mailto:menelson@gmail.com)>  
**Date:** Fri, Nov 27, 2020 at 11:35 AM  
**Subject:** Tailpipe pollution (PM 2.5) causes developmental delay, damage and Alzheimer's symptoms in children  
**To:** Steven Keller <[skeller@rbusd.org](mailto:skeller@rbusd.org)>, Tim Stowe <[stowe.tim@tusd.org](mailto:stowe.tim@tusd.org)>  
**Cc:** Communications <[communications@bchd.org](mailto:communications@bchd.org)>, Brad Serkin <[bserkin@rbusd.org](mailto:bserkin@rbusd.org)>, <[bwaller@rbusd.org](mailto:bwaller@rbusd.org)>, <[dwitkin@rbusd.org](mailto:dwitkin@rbusd.org)>, <[rflinn@rbusd.org](mailto:rflinn@rbusd.org)>, <[mchristensen@rbusd.org](mailto:mchristensen@rbusd.org)>, <[Gerson.Jeremy@tusd.org](mailto:Gerson.Jeremy@tusd.org)>, <[han.james@tusd.org](mailto:han.james@tusd.org)>, <[lee.don@tusd.org](mailto:lee.don@tusd.org)>, <[lieu.betty@tusd.org](mailto:lieu.betty@tusd.org)>, <[ragins.terry@tusd.org](mailto:ragins.terry@tusd.org)>

Here is the legacy that the current BCHD Board of Directors and executive management is actively targeting: PREMATURE ALZHEIMER'S IN CHILDREN. Is BCHD building an 800 car, 8-story parking garage and a 793,000 sqft, South Bay Galleria sized complex largely for non-residents of the 3 Beach Cities that own BCHD worth destroying the future of our children? The children of Towers and Beryl Heights schools should not suffer more PM2.5 lodged in their brain stems because BCHD's Board wants to let developers lease our taxpayer owned campus for 50-100 years. RBUSD and TUSD will be grossly negligent if they allow our children to be bombarded by 3-5 generations of increased, unnecessary pollution as the result of non-residents of the area. The areas around Beryl Heights and Towers schools, and the children and residents must not be sacrificed for the ego needs of the BCHD Board and executive management to serve 95% non-local renters and PACE participants in their over-development project.

MN21-1

<https://www.universityofcalifornia.edu/news/air-pollution-impacts-childhood-development-study-shows>  
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6617650/>  
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5893638/>  
<https://airqualitynews.com/.../evidence-of-alzheimers.../>  
[https://www.who.int/ceh/publications/Advance-copy-Oct24\\_18150\\_Air-Pollution-and-Child-Health-merged-compressed.pdf?ua=1](https://www.who.int/ceh/publications/Advance-copy-Oct24_18150_Air-Pollution-and-Child-Health-merged-compressed.pdf?ua=1)

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:04 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: The DEIR Fails to Consider EJ Impacts

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Tuesday, April 6, 2021 5:01 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** The DEIR Fails to Consider EJ Impacts

### Economic & Environmental Justice

<https://oag.ca.gov/environment/ceqa>

<https://oag.ca.gov/environment/justice>

<https://oag.ca.gov/search-results/?query=economic+justice>

MN22-1 [https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/ej\\_fact\\_sheet.pdf](https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/ej_fact_sheet.pdf)

<https://calrecycle.ca.gov/SWFacilities/Permitting/CEQA/Documents/EIR/Contents/>

The neighborhoods to the north of the campus are younger, lower income and are being exploited by BCHD because as renters, they are less likely to be able to mount an effective opposition. Thus BCHD has weaponized EJ.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:04 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Comments to RB Mayor, Council and Planning Commission  
**Attachments:** YYY BCHD Misrepresentation to City Attorney.pdf; YYY BCHD Net Negative Redondo Beach Impacts.pdf

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Tuesday, April 6, 2021 4:59 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Fwd: Public Comments to RB Mayor, Council and Planning Commission

MN23-1 Comments on BCHD lack of net positive impacts from the project and therefore, inability to override significant impacts from aesthetics, noise, and lost recreation.

----- Forwarded message -----

**From:** Mark Nelson (Home Gmail) <[menelson@gmail.com](mailto:menelson@gmail.com)>  
**Date:** Sun, Nov 1, 2020 at 8:56 PM  
**Subject:** Public Comments to RB Mayor, Council and Planning Commission  
**To:** <[cityclerk@redondo.org](mailto:cityclerk@redondo.org)>, Brandy Forbes <[brandy.forbes@redondo.org](mailto:brandy.forbes@redondo.org)>

The following along with its attachments is a public comment. Prior to February 15, 2019, BCHD indicates in the attached letter to the Redondo Beach City Attorney that it represents the benefits of its proposed BCHD expansion to 792,000 sqft feet at the 514 N Prospect location as both certain and significant for Redondo Beach residents, however, as CEO Bakaly Admitted on October 9, 2020, BCHD had not yet conducted analysis. BCHD asserts to the effect that "Clearly the HLC will have significant benefits to Redondo Beach residents" in the February 2019 letter. In plain English, "clearly" means "with nearly absolute certainty" and "significant" means "of great importance." BCHD offers no proof of either term because BCHD had not begun any analysis. BCHD concealed the communication for nearly 18 months from the public.

MN23-2 As an expert witness in economics, statistics, planning and environmental, I have examined the benefits and likely Environmental and Economic Justice impacts of both the current and proposed BCHD campus and project. Given that Redondo Beach suffers 100% of the EJ impacts of the BCHD project, and per BCHDs consultant MDS will gain only 8% of the benefit, the statement "clearly" is clearly inaccurate, and the statement "significant" can only be correct if interpreted as significant DISBENEFITS.

Based on CEO Bakaly's email, BCHD has misrepresented the project impacts to the City Attorney and the City of Redondo Beach by hiding the discussions in the shadows and denying the public the right of participation and comment on BCHD false statements. BCHD had no fact base to make any representation to the City of Redondo Beach, yet it did make representations to the City absent facts. Now the Redondo Beach public has been seriously harmed by the conclusion drawn by the City of Redondo Beach City Attorney based on representations absent proof.

MN23-2  
(cont.)

CEO Bakaly, on October 9, 2020 by email acknowledged that BCHD currently has no analysis regarding the benefits and damages of the proposed project on Redondo Beach residents, and therefore, BCHD assertions of February 2019 are known to be false and without analysis. Bakaly wrote "the draft Environmental Impact Report currently being prepared will assess and analyze [FUTURE TENSE] any impacts associated with the proposed Healthy Living Campus upgrade." (note:Tom Bakaly, Beach Cities Health District via [auth.ccsend.com](mailto:auth.ccsend.com) October 9, 2020 4:00PM)

At a minimum, the City of Redondo Beach must reject the BCHD letter of February 2019 as misleading and inaccurate. On behalf of the residents of Redondo Beach, I would encourage a City investigation into the material misrepresentations made by BCHD to the City of Redondo Beach and its attempt to defraud Redondo Beach residents from their due process rights.



HOOPER, LUNDY & BOOKMAN, P.C.

WRITER'S DIRECT DIAL NUMBER:  
(310) 551-8137

WRITER'S E-MAIL ADDRESS:  
SKRUL@HEALTH-LAW.COM

FILE NO. 80375.835

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1875 CENTURY PARK EAST, SUITE 1600  
LOS ANGELES, CALIFORNIA 90067-2517  
TELEPHONE (310) 551-8111  
FACSIMILE (310) 551-8181  
WEB SITE: WWW.HEALTH-LAW.COM

OFFICES ALSO LOCATED IN  
SAN DIEGO  
SAN FRANCISCO  
WASHINGTON, D.C.  
BOSTON

February 15, 2019

**VIA EMAIL AND U.S. MAIL**

**michael.webb@redondo.org and Cheryl.Park@redondo.org**

Michael Webb, Esq., City Attorney  
Cheryl Park, Esq., Assistant City Attorney  
Redondo Beach City Attorney's Office  
415 Diamond Street  
Redondo Beach, California 90277

Re: Inapplicability of Article XXVII of Redondo Beach Municipal Code (the "City Charter") to Beach Cities Health District Healthy Living Campus Project

Dear Mr. Webb and Ms. Park:

We are writing this letter on behalf of our client, Beach Cities Health District ("BCHD"), to confirm your agreement with our conclusion that voter approval is not required in order to proceed with BCHD's Healthy Living Campus Project (as described more fully below).

Statement of Facts

BCHD desires to redevelop its health campus with a continued focus on enhancing residents' health through prevention, treatment and education, but with improved and updated services and providing for a broad continuum of care with an intergenerational care component.

Specifically, on its main campus (the "Main Campus"), BCHD desires to: (1) replace the existing assisted living facility with a new facility containing approximately 360 assisted living units and 60 memory care units for older adults, which BCHD intends to license as a residential care facility for the elderly (the "RCFE"), (2) redevelop its fitness center, and (3) construct a Community Wellness Pavilion that will provide a variety of additional community health center programs and services, including:

- (i) a community presentation hall (estimated 150 person capacity) for community conferences, workshops, lectures, board meetings, trainings, summits and other meetings ;
- (ii) a demonstration kitchen (estimated 20-40 person capacity) for food literacy workshops, nutritional cooking demonstrations and similar uses;



Michael Webb, Esq., City Attorney  
Cheryl Park, Esq., Assistant City Attorney  
February 15, 2019  
Page 2

- (iii) flexible community meeting spaces (estimated capacity 30-75 people) for trainings, presentations, events, workshops, support groups and other meetings ;
- (iv) rooftop gathering spaces for exercise classes, gardening and other small outdoor events;
- (v) a learning/visitor center expected to feature the BCHD story, resources, health literacy, interactive education, awards and information about BCHD's partners;
- (vi) a Blue Zones café to provide a healthy educational eating experience for BCHD personnel, residents of the RCFE and their families, persons using the fitness center and other Health Living Campus visitors; and
- (vii) administrative offices for BCHD personnel.

The Main Campus community health center will also include active green spaces that will be available for community events, farmers markets, fitness programs, walking and other gathering spaces that promote health and well-being.

In addition to the Main Campus improvements, BCHD also desires to construct a child day care center on the lot adjacent to the Main Campus and located at the corner of Flagler Lane and Beryl Street (the "Flagler Parcel"). The proposed uses on the Main Campus and the Flagler Parcel are collectively referred to herein as the "Healthy Living Campus Project."

The Main Campus is designated P (Public and Institutional) in the General Plan and zoned P-CF (Public – Community Facility), and the Flagler Parcel is designated C-2 Commercial in the General Plan and similarly zoned C-2 (Commercial).

#### 1. Measure DD - Ballot Requirement

In November 2008, the residents of the City of Redondo Beach (the "City") approved Measure DD, to amend the Official Charter – Redondo Beach Municipal Code (the "City Charter") by adding Article XXVII to require voter approval of specified changes in allowable land use. The express purpose of Article XXVII (Major Changes in Allowable Land Use), as provided in Section 27.1 of the City Charter, is as follows (emph. added):

- "(a) Give the voters of Redondo Beach the power to determine whether the City should allow *major changes in allowable land use*, as defined below, by requiring voter approval of any such proposed change, and, thereby ensure maximum public participation in major land use and zoning changes proposed in the City;

Michael Webb, Esq., City Attorney  
Cheryl Park, Esq., Assistant City Attorney  
February 15, 2019  
Page 3

(b) Ensure that the voters of Redondo Beach receive all necessary and accurate environmental information on proposals for *major changes in allowable land use*, so that they may intelligently vote on any such proposal;

(c) Ensure that City officials provide timely, accurate and unbiased environmental review of all proposals for *major changes in allowable land use*, so that they may minimize their adverse traffic and land use impacts and maximize neighborhood compatibility before the voters decide on any such change;

(d) Ensure that all elements of the *land use change* approved by the voters are implemented; and

(e) Protect the public health, safety and welfare, and the quality of life, for all citizens living or working in the City, and for all visitors to the City.”

To effectuate this purpose, Section 27.4(a) of the City Charter requires each “major change in allowable land use” to be “put to a vote of the People.” The key question, then, is whether the Healthy Living Campus Project would result in a “Major Change in Allowable Land Use” as defined by the City Charter.

## 2. Major Change in Allowable Land Use

Section 27.2(f) of the City Charter defines “Major Change in Allowable Land Use” as “any proposed amendment proposed amendment [sic], 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)” which meets one or more specified conditions.<sup>1</sup> Therefore, to determine whether the Healthy Living Campus Project uses

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<sup>1</sup> There are no conditions actually listed under Section 27.2(f), but paragraphs (1), (2) and (3) following Section 27.2(g) each refers to a “proposed change in allowable land use” whereas subdivision (g) defines “Peak Hour Trips” and has no references to any paragraphs. In *Building a Better Redondo, Inc. v. City of Redondo Beach* (2012) 203 Cal. App. 4th 852, the court concluded that, from the context of the City Charter provisions and giving meaning to each provision, paragraphs (1), (2) and (3) appearing under subdivision (g) should be construed as properly a part of subdivision (f). Those conditions are: (1) the proposed change in allowable land use would significantly increase traffic, density or intensity of use above the as built condition in the neighborhood where the major change is proposed; (2) the proposed change in allowable land use would change a public use to a private use. [“A major change in allowable land use in this category shall include a change of use on ... (v) land allocated to the Beach Cities Health District... ”], and (3) the proposed change in allowable land use would change a nonresidential use to residential or a mixed use resulting in a density of a greater than 8.8 dwelling units per acre whether or not any such unit is used exclusively for residential purposes.



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would constitute a Major Change in Allowable Land Use the threshold question is whether any of the contemplated uses would necessitate an amendment, change or replacement of the General Plan and/or the applicable zoning ordinances (referred to herein collectively as the "Zoning Ordinance"). If the answer is no (as is the case with respect to the Healthy Living Campus Project), then, regardless of whether the additional conditions are otherwise triggered, there will be no Major Change in Allowance Land Use.

- a. Redondo Beach General Plan (the "General Plan"), Including its Local Coastal Element, as Defined in Public Resources Code Section 30108.55)<sup>2</sup>

The Healthy Living Campus Project would not require a change to the current General Plan, but rather falls within the stated objectives and policies of the General Plan.

Objective 1.3 of the Land Use Element of the General Plan is to "[p]rovide for the continuation of existing and new development or recycling of commercial uses to meet the needs of the City's residents." In furtherance of that objective, Policy 1.3.1 is to "[a]llow for the development of community-oriented ... services... and other commercial uses which provide for the needs of existing and future residents as appropriate in areas classified as Commercial [C-2] on the Land Use Plan map." Objective 1.5 of the Land Use Element of the General Plan is to "[p]rovide for the continuation of existing and development of new public service uses and facilities which meet the needs of the City's residents." In furtherance of that objective, Policy 1.5.1 is to "[a]llow for the continuation of existing public recreational, cultural (libraries, museums, etc.), educational ... and health uses at their present location [areas classified as Public ("P") on the Land Use Plan Map] and development of new uses where they complement and are compatible with adjacent land uses," and Policy 1.5.2 is to allow for the development of private educational uses in areas classified as C-2, provided they are compatible with adjacent uses."

Additionally, the section on "Public and Institutional Uses" within the Land Use Element of the General Plan notes that the Public and Institutional ("P") designation includes a variety of uses with a variety of characteristics that "do not fit well under the typical standards for residential, commercial, or industrial uses" and therefore "no attempt has been made to establish specific development standards within the General Plan." Instead, the General Plan states that the

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<sup>2</sup> California Public Resources Code Section 30108.55 defines "Local coastal element" as "that portion of a general plan applicable to the coastal zone which may be prepared by local government pursuant to this division, or any additional elements of the local government's general plan prepared pursuant to Section 65303 of the Government Code, as the local government deems appropriate." Based on our review of the City of Redondo Beach Coastal Land Use Plan Map for the Local Coastal Program (i.e. the City of Redondo Beach's Coastal Element), the subject property is not located in the coastal zone.

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City's Zoning Ordinance will "implement the Public/Institutional designation through multiple zoning districts more focused on the different classes of public/quasi-public uses" and that these particular zones, through the City's Zoning Ordinance, will contain more specific development standards." Objective 1.46 of the Land Use Element of the General Plan for "P" zoned lands (such as the Main Campus) is to "[p]rovide for the ... expansion of ... recreation... human service, cultural and educational... and other public land uses and facilities to support the existing and future population and development of the City." That objective is furthered by Policy 1.46.1 to accommodate permitted uses such as "parks and recreation," "public open space," "educational," "cultural" (e.g. libraries, museums), "human health," "human services," "public and private secondary uses" and "other public uses" within the "P" zone areas.

The redeveloped community health center with RCFE on the Main Campus, and the proposed child day care center on the Flagler Parcel (i.e. within a C-2 zone), further those stated objectives and comport with the stated policies.

More specifically as to the issue of senior housing, the Housing Element of the General Plan reflects the intent for senior housing "to be within walking distance of a wide range of commercial retail, professional, social and community services" (see pages 58-59) and requires that the City "identify adequate sites to be made available through appropriate zoning and development standards to encourage the development of a variety of types of housing for all income levels" (see page 50). The corresponding Table H-37 on page 51 of the Housing Element, which identifies the City's zoning provision for various types of housing, specifically references Residential Care Facilities (with a conditional use permit) for P-CF zoned areas.

We understand that there are currently limited options for the approximately 15,000 older adults in Beach Cities (94% of whom want to stay in the Beach Cities community), and the assisted (and independent) housing for older adults in Beach Cities is at or near capacity, with wait lists for assisted-living facilities up to 3 years. There is also a lack of housing that provides the continuum of care contemplated by the Healthy Living Campus Project. These facts clearly point to the need for additional senior housing within the area, such that the Healthy Living Campus Project aligns with the General Plan objectives and policies describe above.

With respect to the child day care center, we note that Goal 4A of Section 2.3 of the General Plan (i.e. the Senior Citizen Services/Child Care Services element) is for the City of Redondo Beach to "[c]ontribute ...to the future development... of successful child care programs within the community," and Policy 4.1.6, in furtherance of that goal, is to "[e]ncourage local public and private firms and businesses to examine the potential for establishing employer-sponsored or work-place located child day care services, and other employer-sponsored programs designed to ease family versus work demands." The child day care center on the Flagler Parcel supports this goal and related policy, by providing conveniently located child care for the many employees of BCHD (and the surrounding community). Locating the child day



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care center next door to the RCFE delivers the added benefit of strengthening intergenerational connections through joint activities between residents of the RCFE and children of the child day care center.

Each of the provisions of the General Plan described above support the development of Healthy Living Campus Project without any amendment to the General Plan necessary (we found no provisions within the General Plan that would prohibit that project). As such, it is necessary to look to the City's Zoning Ordinance next.

b. City's Zoning Ordinance<sup>3</sup>

The Healthy Living Campus Project will not require a change to the City's Zoning Ordinance. As noted above, the Main Campus is zoned P-CF and the Flagler Parcel is zoned C-2.

Pursuant to Section 10-2.1100 of Title 10, Chapter 2 of the Zoning Ordinance, among the specific purposes of the P Public and Institutional zones (which includes the P-CF zone) are to: “(a) 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.”

The P-CF specific permitted uses under Section 10-21110 of Title 10, Chapter 2 of the Zoning Ordinance expressly include community centers and ancillary uses/structures (subject to obtaining a conditional use permit). As defined in Section 10-2.402(a) of Title 10, Chapter 2 of the Zoning Ordinance:

(51) “**Community center**” means a building, buildings, or portions thereof used for recreational, social, educational, and cultural activities which buildings are owned and/or operated by a public, nonprofit, or public serving group or agency.”

(5) “**Accessory use**” shall mean a use incidental, related, appropriate, and clearly subordinate to the main use of the lot or building, which accessory use does not alter the principal use of the subject lot or affect other properties in the zone.

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<sup>3</sup> The “Major Change in Allowable Land Use” definition references both the City's zoning ordinance as defined and contained in Title 10, Chapter 2 of the Redondo Beach Municipal Code, and the zoning ordinance for the coastal zone as defined and contained in Title 10, Chapter 5 of the Redondo Beach Municipal Code. The subject property does not fall within the Redondo Beach Coastal Land Use Plan Map area, so this analysis looks only to the general zoning ordinance under Title 10, Chapter 2. In contrast, the Kensington RCFE project was located in the Coastal Land Use Plan Map area and subject to the separate coastal zone ordinance which, at the time of the Measure K vote in 2016, did not allow for RCFEs in the applicable zone and therefore required voter approval.

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The various components of the overall community health center, including the fitness center, presentational hall, demonstration kitchen, flexible community meeting spaces, rooftop gathering spaces, learning/visitor center, Blue Zones café, administrative offices, and active green space, constitute community center recreational, social, educational and cultural activities, and related accessory uses.

State licensed residential care facilities such as the RCFE are similarly expressly permitted under Section 10-21110 of Title 10, Chapter 2 of the Zoning Ordinance (with a conditional use permit). Residential care facilities, as defined in Section 10-2.402(a)(145) of Title 10, Chapter 2 of the Zoning Ordinance, are residential facilities “providing twenty-four (24) hour nonmedical care for persons in need of personal services, supervision, protection, or assistance essential for sustaining the activities of daily living” and include the sub-category of “residential care facilities for the elderly” (defined in subsection (c) as “a state-licensed housing arrangement chosen voluntarily by residents over sixty (60) years of age where varying levels and intensities of care and supervision, protective supervision, personal care or health-related services are provided, based upon residents' varying needs, as determined in order to be admitted and remain in the facility, as defined in Chapter 3.2 of the California Health and Safety Code, Section 1569 et seq.

We note also that P-CF permitted uses under Section 10-21110 of Title 10, Chapter 2 of the Zoning Ordinance include comparable qualifying uses, such as open space, recreational facilities, public gymnasiums, athletic clubs, and cultural institutions, further evidencing that the Healthy Living Campus Project uses on the Main Campus align directly with approved P-CF uses.

Pursuant to Section 10-2.620 of the Zoning Ordinance, C-2 permitted uses include “child day care centers” – as contemplated for the Flagler Parcel – with a conditional use permit.

Despite the conditional use permit requirement, a conditional use permit is separate and distinct from a general plan or zoning amendment, and therefore does not constitute a Major Change in Allowable Land Use. In fact, Article 12 (Procedures) of Chapter 2 of the Zoning Ordinance specifically differentiates between zoning amendments, general plan and specific plan amendments, conditional use permits and variances through separate and distinct sections of Title 10, Chapter 2 of the Zoning Ordinance (Sections 10-2.2504, 10-2.2505, 10-2.2506 and 10-2.2510, respectively).

Accordingly, the provisions of the Zoning Ordinance cited above support the development of the Healthy Living Campus Project without any amendment to the Zoning Ordinance necessary.

#### Conclusion

As noted above, both the provisions of the General Plan and the Zoning Ordinance support the Healthy Living Campus Project uses without any amendments necessary to either.



HOOPER, LUNDY & BOOKMAN, P.C.  
HEALTH CARE LAWYERS & ADVISORS

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Cheryl Park, Esq., Assistant City Attorney  
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As such, the Healthy Living Campus Project does not constitute a Major Change in Allowable Land Use and therefore does not require a public vote (notwithstanding the requirements to obtain a conditional use permits, as applicable). Preliminary trip generation reports obtained by BCHD reflect that the Healthy Living Campus Project is expected to reduce daily, morning, and evening peak hour trips compared with the existing site, thereby reducing traffic at this location – further supporting the goals of the City's General Plan.

Clearly, the Healthy Living Campus Project will be of significant benefit to the residents of the City of Redondo Beach, allowing for BCHD to improve its community health center programs and services, create an intergenerational hub of well-being and grow a continuum of programs, services and facilities to help older adults age in their community. BCHD is eager to move forward with the project as soon as possible. Therefore, BCHD would like to meet with you to discuss next steps related to the Healthy Living Campus Project. BCHD's primary contact for purposes of continued discussion on this matter is Mr. Tom Bakaly, and he may be reached by email at [Tom.Bakaly@bchd.org](mailto:Tom.Bakaly@bchd.org), or by phone at (310) 374-3426.

Respectfully,



Sandi Krul

SK

cc: Mr. Tom Bakaly, CEO (via email)  
Robert W. Lundy, Esq. (via email)

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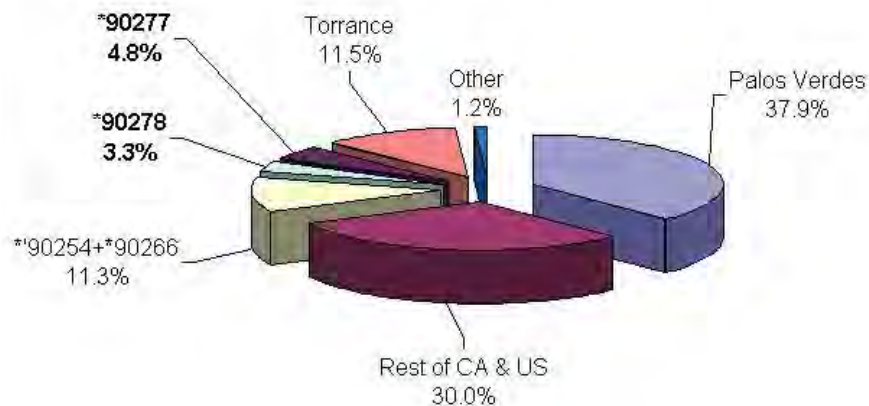
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<b>BCHD Consultant MDS 2019 Marketing Results</b>	
<b>2019 Income Qualified Prospective Renters (by area)</b>	
<b>Palos Verdes</b>	<b>37.9%</b>
<b>Rest of CA &amp; US</b>	<b>30.0%</b>
<b>*90254+*90266</b>	<b>11.3%</b>
<b>*90278</b>	<b>3.3%</b>
<b>*90277</b>	<b>4.8%</b>
<b>Torrance</b>	<b>11.5%</b>
<b>Other</b>	<b>1.2%</b>
<b>CONTROL TOTAL</b>	<b>100.0%</b>
<b>Redondo Beach Total</b>	<b>8.1%</b>
<b>*=BCHD Owners Total</b>	<b>19.4%</b>

**BCHDs MDS Marketing Firm 2019 Target Prospects**  
Percentage of Qualified Prospects by Area for BCHDs Development



Source: BCHD 2019 Marketing Study, Exhibit 3-3

MN23-8  
(cont.)

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:05 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Receipts for DEIR Comments

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Tuesday, April 6, 2021 8:47 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Receipts for DEIR Comments

MN24-1 It is impossible to be assured that DEIR comments have been received. When do you plan on receipting for them? Alternatively, are you planning to post them as they are received?



## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:02 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Letter of Objection to BCHD Project from BCHD CWG Member  
**Attachments:** BCHD Board Meeting Opposition Letter Nov 6 2019.pdf; MN Comments BCHD NOP-EIR for BoD Mtg 4-24-19.pdf

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Tuesday, April 6, 2021 4:34 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Fwd: Letter of Objection to BCHD Project from BCHD CWG Member

MN25-1 The following are comments for the DEIR record, reflecting both areas of known controversy, EJ impacts (as per the CA Attorney General letter), negative health impacts, environmental impacts, and a pre-NOP communication when it was clear that BCHD was ignoring its own CWG.

----- Forwarded message -----

**From:** Mark Nelson (Home Gmail) <[menelson@gmail.com](mailto:menelson@gmail.com)>  
**Date:** Wed, Nov 6, 2019 at 12:07 PM  
**Subject:** Letter of Objection to BCHD Project from BCHD CWG Member  
**To:** Cristan Higa <[cristan.higa@bchd.org](mailto:cristan.higa@bchd.org)>  
**Cc:** <[CityClerk@torranceca.gov](mailto:CityClerk@torranceca.gov)>, Martinez, Oscar <[OMartinez@torranceca.gov](mailto:OMartinez@torranceca.gov)>, Brandy Forbes <[brandy.forbes@redondo.org](mailto:brandy.forbes@redondo.org)>, Eleanor Manzano <[eleanor.manzano@redondo.org](mailto:eleanor.manzano@redondo.org)>

MN25-2 Please see attached. It is formally submitted to the records of BCHD Board of Directors, Torrance and Redondo Beach City Councils as public comment for their next meetings, and Torrance and Redondo Beach Planning Commissions as public comment for their next meetings. Further, I attached my April 2019 comments to the BCHD Board that were made in anticipation of the project as reference and public comment.

April 22, 2019

Mark Nelson

[menelson@gmail.com](mailto:menelson@gmail.com)

CWG Member – Redondo Beach local neighborhood, Prospect Ave.

## Comments on Potential BCHD HLC Project and NOP/EIR Formulation

BCHD Board of Directors and Staff:

MN25-3 As a member of the Community Working Group, I have made many of these comments in writing or in discussion during our group meetings. Typically however, our discussions in the CWG are more along the lines of framing the project and reacting to proposals, and they are less about the multi-facets of the environmental analysis and City of Redondo permitting. In any event, my prior comments have not been made in light of a potential NOP, and as such, I am using typical portions of an EIR table of contents to guide this comments.

These comments are predominantly written from the perspective of the local Redondo Beach Beryl Heights neighborhood where I live, which is most likely to be impacted by the project in both the construction phases and the ongoing operations.

### Project and Program Description

MN25-4 As is mandatory for an undertaking such as the Healthy Living Campus, the project must be described in detail. Because this is mixed-use (residential, public, professional, food service, and perhaps retail), the neighborhood residents will require significant detail to evaluate and determine its ultimate support or opposition based on the benefits and detriments of the proposal. A number of specific issues come to mind, including but not limited to descriptions and dispositions of: the specific facilities for use by area residents, the timing of development of those facilities, the displacement (and accommodation) of medical services that many of us currently use in the 510 building, anticipated phasing and timing, operating days and hours, and the project's physical characteristics. Because this is a program, that is, a series of related projects across a significant timespan and likely several management teams (up to 15 years), a detailed description of each phase, its timing, and its linkages to other parts of the mixed-use campus is required. An example would be the timing and linkages of residential housing, the Center for Health and Fitness replacement, meeting rooms, cafes, etc. Also, the impacts cannot be determined without an understanding of pricing and subsidy policies, such as: pricing policy for residential assisted living, food service, fitness clinic, and other products and services.

### Alternatives

MN25-5 The CWG has had only brief discussions about alternatives, and they included additional/replacement land leases such as 510 and 520. No other uses other than the HLC have been brought forth that I am aware of, and I believe that a robust set of alternative uses of the BCHD land is needed.

### No Project Alternative

MN25-6 The CWG has had a limited discussion of the No Project Alternative in the form of some financial projections of the retirement of 514. The No Project Alternative is not well understood to my thinking, and it requires significant development and explanation such that the surrounding neighborhood can understand what happens if the HLC or one of its alternatives fail to move forward. Some examples include: a parallel to the AES Power Plant (shutdown, decommission, park land), sale for real estate or other development, alternative use of the existing buildings, termination of BCHD, etc.

### Purpose and Need

MN25-7

BCHD and its activities were a deviation from the South Bay Hospital that preceded it. The HLC will be a deviation in some activities (district owned rental housing) from the BCHD activities to date. Given that health districts in California have a variety of functions, a crisp discussion of the purpose and need of the project will be very helpful. Over two years of discussion, the CWG has inferred purpose and need, but communications to the adjacent landowners will need to be full, concise and persuasive. Further, recent CWG discussions have focused on the HLC being a financial engine for the BCHD other activities, and also as an engine to discount the cost of assisted living for financially qualified local residents. That discussion seems to be an integral part of purpose and need that is currently lacking a concise written form.

### Aesthetics

MN25-8

From the local neighborhood perspective, I continue to have my stated concerns about mass, height, setbacks, artificial lighting, sun reflection, and invasion of the visual privacy of the surrounding homeowners. Simulations, elevations, illustrations, and models will be needed to provide an adequate disclosure of the design. Again, because this is phased, it will be important to understand timing and activities on the BCHD site during the decade to 15 year interim period.

### Air Quality

MN25-9

While I don't currently anticipate any specific air quality issues, I am concerned that exhaust from the underground parking and from any food preparation facilities are not a burden on the local receptors. As a result, the program should disclose and analyze emissions beyond any onsite cooling towers, generators, boilers or other equipment and include food preparation and parking ventilation at a minimum. Construction is another issue however with respect to air quality impacts, with demolition debris, truck and transport emissions, PM2.5s and PM10s from all sources, concrete flydust, fugitive dust, portable generators, construction equipment, and other concerns. It is likely that the buildings are laden with asbestos (to be discussed in HazMat) and any wind drift causing toxins to spread will be unacceptable to the neighborhood, therefore, any potential winddrift accumulated biohazard will need to be managed during demolition.

### Biology

MN25-10

The biological impacts of the changing use of the BCHD campus will be analyzed, with special emphasis needed on urban wildlife such as coyotes, raccoons, opossums, rats, mice, raptors, feral cats, nuisance animals and insects, etc. The neighborhood, its children and pets are at risk from potential disease and attack.

### Energy

MN25-11

Neighborhood concern regarding energy would arise in the long term if the facility had significant onsite generation that would either pose a potential fuel and emissions hazard, or, a local area line voltage fluctuation. Concerns over diesel fuel generator use during construction are needed, and disclosure is required for the neighborhood's review.

### Geotechnical

MN25-12

Aside from proper retaining walls, removal (not abandonment) of buried piping and tanks, etc., I see no particular geotechnical concerns from a neighborhood perspective. The standard analysis should suffice, including disclosure of the local seismic background.



### GHG

MN25-13 GHG is a global issue. Again, the neighborhood may have concerns if BCHD uses onsite alternative energy generation to mitigate GHGs, as wind turbines and solar panels can have unintended side effects to wildlife, create noises that curtail neighborhood quiet enjoyment of our property, or create solar panel glare or heat islanding. Any plans for onsite GHG mitigation should be disclosed.

### HazMat

MN25-14 Biohazards, biowaste, asbestos, PM<sub>xx</sub>, diesel, fuel oil, underground tanks, buried pipelines, etc. both during demolition and during long term operation are a neighborhood concern that will require disclosure.

### Hydrology

MN25-15 Water capture (rain), water runoff (rain), and water runoff (irrigation) are at present the only impacts that I see of concern to the neighborhood. BCHDs analysis will need to assess their needs for construction.

### Land Use/CUP

MN25-16 A clear understand of the future land uses for the project, alternatives and no project will be needed for the local area to understand its optionality with respect to the project. Covenants on long term use may be required for neighborhood support to assure that the site does not become an incompatible use with the neighborhood, for example. Notwithstanding legal opinions, the local area may opt to sponsor a local initiative “vote of the people” for any change in use of the site that was originally, legislatively a hospital and was never contemplated for 400 residential units.

### Noise

MN25-17 The current facility has significant operational noise with emergency vehicles, vehicle traffic, loading and unloading, trash collection, night and weekend maintenance, etc. that impact the adjacent neighborhood. A curtailment of long run noise is compatible with the housing component of the project and with the neighborhood. A decade of construction noise and any amplified or acoustically concentrated (constructive wave interference) noise from the green space or circular building will need to managed heavily as well. If the Beryl Heights neighborhood is at the mouth of a de facto amphitheater, it is unlikely that the neighborhood will support the project. Noise, both long term and construction, is a very, very important design factor and concern.

### Population and Housing

MN25-18 The Residential Care Facility for the Elderly (or assisted living) housing will be 400 beds from our initial understanding. That is equivalent to about 125 local area homes, or roughly 4 blocks of the surrounding homes worth of additional population and housing. While that doesn’t seem large, it will be incumbent on BCHD to explain the impacts from services, occupant traffic, visitor traffic, rideshare traffic, and other ancillary local impacts.

### Public Services and Utilities

MN25-19 California is in the midst of a homeless crisis. Large open spaces are double-edged swords, and will require tight management by the BCHD or lessees in order to assure that the neighborhood does not end up with an encampment or increased levels of transients. Thus, a full description of both private security and policies, along with a participating agency analysis by the RBPD and perhaps surroundings Pds will be needed for local neighborhood assessment of the project. In addition, the usual gas, water, sewer, and power analysis by local suppliers will be required to understand any local impacts, such as drainage, sewer, water supply, gas/power, or other public utility services.

### Transportation and Parking

South Bay Hospital had a very negative relationship with the local community with regard to parking. Undersizing the parking at BCHD, or assuming high proportions of rideshare or other parking-reducing actions must be revealed and carefully analyzed. In the 1980s and 90s, the surrounding neighborhoods were forced to use permit parking as result insufficient and overpriced parking at South Bay Hospital, along with poorly managed employee parking policies. That has happened once, and cannot be allowed again.

MN25-20 BCHD traffic emerging from the 510/514 shared driveway has been a long term, unsafe situation. Emerging traffic often does not yield for pedestrians in the crosswalk, creating an unsafe situation. Further, the same traffic heading south asserts an illegal right-of-way and fails to yield to traffic exiting the Prospect frontage road that has the clear, legal right-of-way. As a result, traffic control at the intersection must be modified during this development to assure the legal traffic rights of the area residents. Perhaps the 510/514 driveway should be removed, with access points limited to the existing exits on Prospect to the south of 510 and the north of 520. In any event, the current situation is unacceptable.

MN25-21 This is not intended to be a complete issue listing, however, it will hopefully provide a view from a local resident, who in my case, is approximately 100 feet from my east lot line to BCHDs west lot line at the 510 building according to inspection using Google Earth. Thank you for the ability to participate in this process from the beginning, which will hopefully avoid many of the project pitfalls and conflicts that I've witnessed over the past several decades. Assuming my schedule cooperates, I plan to attend the BoD meeting on the 24<sup>th</sup> of April.

Mark Nelson

Mark Nelson  
[menelson@gmail.com](mailto:menelson@gmail.com)

November 6, 2019

BCHD Board of Directors  
Official Record of November Board Meeting

Dear Board:

MN25-22 As a local resident and a member of the BCHD CWG who has provided formal, and ignored comments in opposition to the mass, height and other construction intrusions on the neighborhood beginning in April of 2019, I oppose the Beach Cities Health District (BCHD) Health Living Campus (HLC) project to develop over 400 apartment-like assisted living units and a total of 600,000 square feet of building space on the existing BCHD. The 60-foot tall structure built on the perimeter of the BCHD lot on top the hill will be in excess of 100 feet higher than some of the surrounding south and east neighborhoods and 70 to 100 feet higher than the north and west neighborhoods. As a result of its height and location on the lot it will be visually taller, more view-blocking, and more privacy invading than the existing BCHD buildings that were previously part of the South Bay Hospital District.

BCHD HAS ALREADY IMPOSED ECONOMIC AND ENVIRONMENTAL JUSTICE DAMAGES ON THE SURROUNDING NEIGHBORHOODS

MN25-23 1. BCHD and its predecessor, the South Bay Hospital District that was terminated in the 1990s have already imposed economic and environmental damages on the surrounding neighborhoods of Redondo Beach for over 60 years. The South Bay Hospital District was formed, approved and funded by a vote of the people that included Redondo Beach. No authorization was included for any activities such as assisted living, senior apartments, or long term care in that authorization.

MN25-24 2. Further, BCHD and its predecessor, the South Bay Hospital District that was terminated in the 1990s have already imposed economic and environmental damages on the adjacent west Torrance neighborhoods for over 60 years without any vote or agreement. As a matter of economic and environmental justice, the surrounding neighborhoods must not be subjected to any further development and operation of a for-profit, discretionary, business investment by Beach Cities Health District.

3. The environmental justice issues include the environmental damage and stress to the surrounding neighborhoods from the demolition, construction and operation of the proposed facility and the economic justice impacts include the diminished residential home values of property surrounding the facility (or any commercial facility) as demonstrated in a number of studies. As a community health organization, BCHD must cease its environmental and economic justice damage to the surrounding neighborhoods.

BCHD IS ACTING UNETHICALLY AND IMMORALLY IN IT'S EXPANSIVE EXPERIMENT TO BUILD FOR-PROFIT, MARKET-RATE HOUSING TO FUND SPECULATIVE BENEFITS OF FUTURE BCHD PROGRAMS

MN25-25 1. Because private entities will provide market-rate assisted living, there is no need for BCHD to construct 400+ market-rate units requiring \$100K to \$225K incomes per the BCHD study reports. BCHD is only proceeding as a grand experiment to extract market rents from the occupants and apply those market rents to future, undefined BCHD programs with unknown and speculative benefits. As a

MN25-25 (cont.) result, the residential care for the elderly component of the healthy living campus is an experiment in funding health districts and must comply with the Declaration of Helsinki principles of ethics and morality.

MN25-26 2. Even if BCHD demolition of its existing facility and construction of its HLC would make the beach cities better off in a health sense, the health damage that BCHD would inflict on the surrounding neighborhoods in terms of chronic stress, noise, traffic, PMx pollution and other environmental and economic justice damages would be unethical and immoral according to application the Declaration of Helsinki principles. The surrounding neighborhoods must provide informed consent in order for BCHD to proceed with the HLC, since the BCHD HLC will unequivocally reduce the quality of life of the surrounding neighborhoods. BCHD is fully aware that it will irreversibly damage the quality of life of the surrounding neighborhoods and it fully aware that's proceeding is both unethical and immoral in a health and medical ethics sense.

#### THERE IS NO PUBLIC NEED FOR BCHD TO DEVELOP ANY ASSISTED LIVING

MN25-27 1. The BCHD public agency developed, market-rate assisted living facility is unneeded in the Beach Cities. Private companies are developing market-rate assisted living facilities. Since BCHD is a full rate facility it provides no benefit beyond provide facilities. Further, since BCHD does not pay taxes, it also disbenefits the local tax base and has a negative economic justice impact. BCHD studies do not provide any need for development by BCHD, nor do they provide any evidence that private companies will not develop market-rate assisted living.

2. The BCHD is an agency of Hermosa, Manhattan and Redondo Beach. Those three communities have no need for 400 units, nor does BCHD's studies provide any support for 400 units of need for residents in the Beach Cities.

MN25-28 3. BCHD approximately 250 square mile, 10 mile radius study are vastly over reaches the mission of BCHD and imposes excessive environmental injustice and economic injustice on the Torrance and Redondo Beach neighborhoods surrounding the campus.

MN25-29 4. A campus with the approximate profile in size, height, and mass to the Kensington Redondo Beach would be adequate to serve the "beach cities" that allegedly fund and control the BCHD.

#### BCHD PROJECT WILL STRESS THE HEALTH OF THE SURROUNDING NEIGHBORHOODS

MN25-30 1. For over 60 years, there has been an additional amount of construction, noise, sirens, and traffic in the neighborhoods surrounding South Bay Hospital and BCHD. This results in chronic stress for residents, especially those who are homebound due to age, health, or work status. As a result, for the past 60 years, BCHD has chronic stress has had the following negative impacts according to the National Institutes of Health

If you experience chronic stress, the same chemicals produced to prepare your body to response keep going for longer periods of time and can impede other bodily functions including weakening your immune system and preventing your digestive, excretory and reproductive systems from working as they should. Chronic stress can lead to sleep and digestive issues, headaches and body aches, depression and irritability, just to name a few potential issues.

The NIH says continued strain on your body from routine stress is often the hardest to detect but could lead to serious health problems such as:

MN25-30  
(cont.)

Heart disease  
High blood pressure  
Diabetes  
Depression  
Anxiety disorder  
Other illnesses

Chronic stress is linked to six leading causes of death including heart disease, cancer, lung ailments, accidents, cirrhosis of the liver and suicide, according to the American Psychological Association.

2. Demolition, construction, and continued operation will have a continued, negative impact on the health of the surrounding neighborhoods through chronic stress of traffic, noise, pollutants and psychological stress – and – that is unethical to impose on those who benefit least, especially by the action of a health district.

#### BCHD PROJECT DAMAGES TO THE SURROUNDING NEIGHBORHOODS WILL BE SEVERE

Like the impacts from the failed South Bay Hospital District on the surrounding neighborhoods, the planned BCHD HLC will have many and severe impacts, including but not limited to:

MN25-31

1. Construction Traffic
2. Ongoing Operations Traffic

MN25-32

3. Vehicle Emissions Damaging the Development of Elementary School Children
4. Vehicle Emissions and Fugitive Dust Emissions to Residents, Especially the Chronically Ill

MN25-33

5. Construction Noise Impacts
6. Ongoing Operations Noise Impacts
7. Vibration Impacts

MN25-34

8. Privacy Invasion from 60' Buildings

MN25-35

9. Aesthetic Viewblocks of the Walled Building
10. Excessive Outdoor Lighting

#### CONCLUSION

MN25-36

The local neighborhoods have been besieged by the list of economic and environmental justice damages caused already by South Bay Hospital District and Beach Cities Health District, and will be damaged by the proposed Beach Cities Health District project. The local neighborhoods' quality of life will be degraded by the BCHD HLC's construction and operation. Because the local neighborhoods were not provided the quid pro quo for informed consent, it is both unethical and immoral for the BCHD to proceed according to application of the Declaration of Helsinki. The local neighborhoods should not be required to suffer further and I therefore oppose the BCHD HLC and its negative impacts to my neighborhood.

Sincerely,

Mark Nelson

cc: Torrance City Council  
Redondo Beach City Council  
Torrance Planning Commission  
Redondo Beach Planning Commission

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:06 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: CPRA - Page 3.6-10 of DEIR - Received

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---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Sunday, April 11, 2021 4:07 PM  
**To:** PRR <PRR@bchd.org>  
**Subject:** CPRA - Page 3.6-10 of DEIR

Provide written evidence given the absence of County of Los Angeles and City of Redondo Beach requirements or ordinances, that

"the seismic hazard presented by the present condition of the Beach Cities Health Center warrants significant hazard reduction measures."

BCHD has made this statement above on Page 3.6-10 of the DEIR as a matter of public record as proponent of the project and accepted the statement as Lead Agency without evidence that BCHD independent judgement or expertise supersedes the judgement of the County of Los Angeles or City of Redondo Beach.



## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:09 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Comments to BCHD 4/13/21 - DEIR

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Tuesday, April 13, 2021 7:35 PM  
**To:** EIR <eir@bchd.org>; Communications <Communications@bchd.org>; cityclerk@redondo.org <cityclerk@redondo.org>; citycouncil@hermosabeach.gov <citycouncil@hermosabeach.gov>; CityClerk@torranceca.gov <CityClerk@torranceca.gov>; cityclerk@citymb.info <cityclerk@citymb.info>; Martha Koo <Martha.Koo@bchd.org>; Noel Chun <Noel.Chun@bchd.org>; Jane Diehl <Jane.Diehl@bchd.org>; Vanessa I. Poster <Vanessa.Poster@bchd.org>; Michelle Bholat <Michelle.Bholat@bchd.org>  
**Subject:** Comments to BCHD 4/13/21 - DEIR

These comments are also included as Public Comments to the Mayors and City Councils of Hermosa Beach, Manhattan Beach, Redondo Beach, and Torrance as owners and participating agencies.

### BEGIN COMMENTS

I'm going to begin providing a prism that all reviewers should use to read the DEIR. This is a very BCHD specific example.

Reviewers should Read the DEIR for interpretation - that is impacts and damages - not raw numbers. Raw numbers are often twisted.

MN27-1 Here's a brief example of BCHD getting the numbers right, SPINNING them, and thereby deceiving the public.

BCHD has a sign up at 514 that says the vote was 6601-3242 in 1956 to fund the South Bay Hospital. As a statement of fact, let's assume that to be true. However, what does it mean? Looks like a 2-1 landslide, right? That bond election required a 2/3rds vote, so 6562 votes were needed to win - so it passed by 39 votes, or about 0.4%. Razor thin. Raw fact vs. interpretation. BCHD posted the sign because it appeared to be a landslide. In reality - it was a squeaker and the hospital nearly wasn't funded. No mandate. No landslide.

### FACTUAL CORRECTIONS

MN27-2 #1 NOP comments were heavier on height comments than build duration comments. Height-related 120, Time-related 73. Clearly, BCHD failed to respond to community input as it created its 2019 and 2020 designs. BCHD cannot claim that it modified the project consistent with the 100s of comments.

MN27-3 #2 190th & Flagler is NOT the high point for key views. The high point is 190th & Prospect and therefore the Aesthetics analysis is defective.

MN27-4 #3 BCHD must propose noise barriers that are at least as tall as those for Legado

### PROJECT OBJECTIVE #1 IS INVALID

MN27-5 1) Based on Redondo ordinances and the strictest City of LA ordinance, BCHD has no objective obligation for seismic retrofit or demolition of the 514 building. BCHD has chosen to use a more stringent "moral obligation" standard to

MN27-5 (cont.) justify its desired action. Sadly, BCHD doesn't provide that moral obligation to protect the health and safety of surrounding residents.

#### AESTHETICS - QUANTITATIVELY THIS PROJECT HAS A SIGNIFICANT NEGATIVE IMPACT BEING OVER 3X THE AVERAGE HEIGHT OF THE 514 BUILDING

MN27-6 2) Only 968 sqft of the existing 514 building is 75-feet tall. That is 0.3% of the current size of the campus buildings. The average height of the 514 is between 32 and 35-feet based on Google Earth Pro. Average height was used by the City of Redondo to limit the height of the Legado new construction, not a contrived 0.3% of area maximum height.

MN27-7 3) The 2019 Proposed BCHD development was 60-feet tall with 729,000 sqft of above ground buildings and 160,000 sqft of subterranean parking. The June 2020 design that was presented on June 12 and approved 3 business days later was said to be 75-feet tall with 792,000 sqft of above ground buildings as the 160,000 sqft of subterranean parking was moved to an 8-story parking ramp. The DEIR design in 2020 is 103-feet tall, with a 10-1/2 story parking ramp and 792,000 sqft of surface buildings.

MN27-8 4) 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.

#### PURPOSE & NEED FAILURE

MN27-9 5) Less than 5% of the MDS analysis likely tenants of the RCFE are from 90277, the host area that has suffered 60 years of negative impacts from South Bay Hospital and BCHD and will suffer the increased damages from BCHD proposed near tripling of the campus.

MN27-10 6) Redondo Beach residents are expected to be only 8% of the tenants of the RCFE, however Redondo Beach will be asked to approve a conditional use permit when the net benefits to Redondo Beach are clearly negative.

MN27-11 7) The 3 Beach Cities are expected to have less than 20% of the tenants in the RCFE, and with Hermosa and Manhattan suffering virtually none of the negative impacts of BCHD development, there's no evidence that the benefits to the 3 beach cities outweighs the construction and ongoing negative benefits. And even if it does, the benefits to residents other than Redondo Beach are irrelevant to the CUP issuance.

MN27-12 8) In order to avoid a public vote, BCHD is only considering a commercially developed and financed project, with for profit operation and high-profit, market-based rents of over \$12,000 per month per each of its consultants. BCHD is a public agency, and must be required to charge cost-based rents, use not for profit management and operations, and finance with tax free public bonds.

#### CONCLUSION

MN27-13 As with the sign in the 514 building regarding the 1956 vote, BCHDs case is misrepresented, razor thin and ripe for a defeat in Redondo Beach because of its lack of benefits compared to damages. The damages caused by BCHD are vastly disproportionate to the benefits for both 90277 and all of Redondo Beach together.

After 60 years of historic damages, BCHD must present a plan for both restitution to existing neighbors, and also a significant increase in local benefits to the adjoining neighborhoods and Redondo Beach to offset the past 60 years and any future operation that relies on non-residents.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:10 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public commenters were concerned that KVL were limited and incorrect

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---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Wednesday, April 14, 2021 2:22 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Public commenters were concerned that KVL were limited and incorrect

Here's a set of KVLs that provide depth of neighborhood instead of BCHDs gamed locations.

<https://www.youtube.com/watch?v=cZFIYyOGtAw>

MN28-1

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:16 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: CPRA - Provide "Moral Obligation" Standards for the Following - Received

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---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Friday, April 16, 2021 9:12 PM  
**To:** PRR <PRR@bchd.org>  
**Subject:** CPRA - Provide "Moral Obligation" Standards for the Following

BCHD CEO has asserted that BCHD is following a "moral obligation" standard with regard to its proposed, non-required, voluntary retrofit or demolition of the 514 building. The standard is discussed at [https://www.youtube.com/watch?v=RCOX\\_GrreIY](https://www.youtube.com/watch?v=RCOX_GrreIY) and an excerpt from the Youtube transcript is:

it is currently not required

00:41

to be upgraded however we are a health

00:44

district we are a health district

00:46

that has a moral obligation to be

00:48

proactive

00:49

and protect the people in our community

Since BCHD clearly is using a "moral obligation" standard to justify its desire to demolish the 514 building, it is both moral and ethical that BCHD uses the same more stringent than ordinances, rules and laws "moral obligation" standard for all other damages to the surrounding community in order to "protect" it from BCHD induced harm.

For the following proposed project damages to the surrounding neighborhood listed below, **provide documents detailing the levels of BCHD's "moral obligation" to "protect the people"**. Appropriate documentation measures include quantitative units, such as hours per week, peak dBA, PPM PM2.5 and PM10, etc.

- 1) What is the moral obligation level of noise that BCHD considers acceptable to protect the people surrounding the project during both construction and ongoing operation?
- 2) What is the moral obligation level of Blue Zones "silent killer" chronic stress that BCHD considers acceptable to protect the people surrounding the project during both construction and ongoing operation?
- 3) What is the moral obligation level of diminished recreational value of the Towers sports fields from shading/shadowing that BCHD considers acceptable to protect the people surrounding the project during both construction and ongoing operation?

- MN29-1  
(cont.)
- 4) What is the moral obligation level of intermittent noise distraction that BCHD considers acceptable to protect the K-5 students at Towers Elementary during both construction and ongoing operation?
  - 5) What is the moral obligation level of particulate matter emissions that BCHD considers acceptable to protect the K-5 students at Towers Elementary during both construction and ongoing operation?
  - 6) What is the moral obligation level of diminished recreational value of the Towers sports fields from shading/shadowing that BCHD considers acceptable to protect the people surrounding the project during both construction and ongoing operation?
  - 7) What is the moral obligation level of particulate matter emissions that BCHD considers acceptable to protect the surrounding homeowners during both construction and ongoing operation?
  - 8) What is the moral obligation level of total environmental justice damages that residents in 90277 should suffer to provide RCFE housing to 96% non-90277 residents, including noise, traffic, vibration, emissions, glare, excess nighttime lighting, chronic stress and the prior 60-years of EJ damages?

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:10 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Comments from 4/17/21 Public Meeting

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Saturday, April 17, 2021 1:12 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Comments from 4/17/21 Public Meeting

Per WSJ March 2021

MN30-1 Wood PLC has agreed to pay \$9 million (£6.5 million) as part of a civil settlement with Scottish prosecutors over an alleged bribery scheme Wood now estimates it will pay around \$197 million in total to resolve

MN30-2 All six of BCHD Project Objectives lacks foundational basis

MN30-3 BCHD Purpose and Need lacks foundational basis.

MN30-3 Because there is no requirement for demolition or retrofit of the 514 building, the no project alternative lacks foundational basis.

The proposed DEIR development is both taller and more sqft of above ground buildings than the 2019 design that the community commented was too large.

MN30-4 At 103' feet tall, the proposed RCFE is over 3 times the average height of the 514 building making it a significant aesthetic impact. The 2019 plan was only 60-feet tall, so the current plan is nearly TWICE as tall.

By removing 160,000 sq ft of underground parking from the 2019 plan, BCHD current plan now has 65,000 sqft MORE of above ground buildings. It is therefore BIGGER than the 2019 plan

The proposed development is nearly 3 times taller than the average height of the 514 building. The City of Redondo used average height for permitting the Legado development

MN30-5 Due to its increase in height, the current plan shades public recreation areas and surrounding neighborhoods and roadways

MN30-6 85 dB intermittent noise will have significant negative impacts on Towers elementary, despite the fact that BCHDs sound averaging shows little increase in average sound levels. Average sound level is the incorrect metric in this case.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:10 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Support Brianna Egan's comment

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---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Saturday, April 17, 2021 1:17 PM  
**To:** EIR <eir@bchd.org>; Communications <Communications@bchd.org>  
**Subject:** Support Brianna Egan's comment

MN31-1|Ms. Egan is correct that BCHD should not be electively demolishing the 514 building.



## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:16 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Comment

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---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Saturday, April 17, 2021 1:15 PM  
**To:** EIR <eir@bchd.org>  
**Cc:** Communications <Communications@bchd.org>; Vanessa I. Poster <Vanessa.Poster@bchd.org>; Noel Chun <Noel.Chun@bchd.org>; Michelle Bholat <Michelle.Bholat@bchd.org>; Martha Koo <Martha.Koo@bchd.org>; Jane Diehl <Jane.Diehl@bchd.org>  
**Subject:** Public Comment

Goes to the credibility (or lack) of the BCHD EIR firm. Place this into the DEIR record and the BCHD Board Record

<https://www.wsj.com/articles/john-wood-to-pay-9-million-to-settle-with-scottish-prosecutors-11616004425>

John Wood Group PLC has agreed to pay \$9 million (£6.5 million) as part of a civil settlement with Scottish prosecutors over an alleged bribery scheme that benefited its legacy joint venture in Kazakhstan.

The settlement was announced on Tuesday after the Aberdeen, Scotland-based oil-field services company said it now estimates it will pay around \$197 million in total to resolve investigations by authorities in the U.K., U.S. and Brazil into business that its legacy companies had with Unaoil. The Monaco-based oil-services firm came under scrutiny in 2016 when media reports alleged it had paid bribes in countries across the globe for many companies in the energy sector.

The latest provision was made in the Wood Group's annual investor report on Tuesday. Last year, the company set aside \$46 million to resolve several of the investigations—although it said at the time that it couldn't yet estimate the financial impact of a settlement with the U.K.'s Serious Fraud Office.

The first of the Wood Group's Unaoil-related settlements, reached Tuesday with Scotland's Crown Office and Procurator Fiscal Service, centered on Production Services Network Ltd., which the Wood Group acquired in 2011. PSN had held an interest in a joint venture that benefited from alleged bribery by Unaoil, Scottish prosecutors said.

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NEWSLETTER SIGN-UP

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The contracts in question were entered into in Kazakhstan in 2008 and 2010, but the venture continued to make payments totaling at the time \$8.7 million, or 1.36 billion Kazakh tenge, to Unaoil until 2015, prosecutors said.

WSJ NEWSLETTER

## Notes on the News

MN32-1  
(cont.)

The news of the week in context, with Tyler Blint-Welsh.

I would also like to receive updates and special offers from Dow Jones and affiliates. I can unsubscribe at any time. I agree to the [Privacy Policy](#) and [Cookie Notice](#).

“The investigation shone a light on behavior that was quite simply unacceptable,” Wood Group Chief Executive Robin Watson said in a statement. “While we didn’t own the business until 2011, we take responsibility for dealing with the consequences and have taken steps to further strengthen our culture and processes to ensure it does not happen again.”

On Tuesday, Wood Group said settlement discussions with the U.K.’s SFO and with authorities in the U.S. and Brazil were at an advanced stage, and could be completed in the second quarter.

Write to Dylan Tokar at [dylan.tokar@wsj.com](mailto:dylan.tokar@wsj.com) and Jaime Llinares Taboada at [jaime.llinares@wsj.com](mailto:jaime.llinares@wsj.com)

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:17 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: READ ALOUD - 4/28/21 Board Meeting - BCHD Board Malfeasance with Investment Banker Vendor KeyBanc

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Monday, April 26, 2021 4:30 PM  
**To:** cityclerk@redondo.org <cityclerk@redondo.org>; cityclerk@citymb.info <cityclerk@citymb.info>; citycouncil@hermosabeach.gov <citycouncil@hermosabeach.gov>  
**Cc:** Communications <Communications@bchd.org>; Vanessa I. Poster <Vanessa.Poster@bchd.org>; Noel Chun <Noel.Chun@bchd.org>; Michelle Bholat <Michelle.Bholat@bchd.org>; Martha Koo <Martha.Koo@bchd.org>; Jane Diehl <Jane.Diehl@bchd.org>  
**Subject:** Fwd: READ ALOUD - 4/28/21 Board Meeting - BCHD Board Malfeasance with Investment Banker Vendor KeyBanc

The following correspondence is for the written record of the next meeting of the Hermosa, Manhattan and Redondo Beach City Councils. Together, the 3 Beach Cities founded and funded the South Bay Hospital District, and continue to own and fund BCHD after the failure of South Bay Hospital.

MN33-1 As you can easily see below, BCHD is relying on quantitative financial advice from KeyBanc (Cain Brothers) investment bankers on feasibility of future deals related to the campus, while at the same time, incenting KeyBanc \$1.8M in the soon to be approved contract and \$200,000 per transaction from a prior contract. The KeyBanc structure encourages them to provide positive analysis, as their deal is backloaded with payments.

The 3 Beach Cities need to exercise some fiduciary responsibility over an agency founded and funded by those 3 cities.

Mark Nelson  
Redondo Beach

----- Forwarded message -----

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Date:** Mon, Apr 26, 2021 at 4:21 PM  
**Subject:** READ ALOUD - 4/28/21 Board Meeting - BCHD Board Malfeasance with Investment Banker Vendor KeyBanc  
**To:** Communications <communications@bchd.org>  
**Cc:** Paul Novak <pnovak@lalafco.org>, Kevin Cody <kevin@easyreadernews.com>, Lisa Jacobs <lisa.jacobs@tbnews.com>, <letters@dailybreeze.com>, <letters@latimes.com>

Public Comment to the Board of BCHD:

MN33-1 (cont.) BCHD incented KeyBanc (aka Cain Brothers) with a \$200,000 per transaction fee for consummating deals, presumably for PACE, RCFE and Memory Care (MC) per a records response (FN#1). This BCHD act was prima facie evidence of malfeasance. BCHD is relying on KeyBanc for the objective feasibility analysis of the PACE, RCFE and MC opportunities, and at the same time, BCHD is incenting KeyBanc for making the deals that result from acceptance of the analysis. But

for KeyBanc providing positive analysis of enterprise potential, KeyBanc would be unable to earn future transaction fees. All KeyBanc analysis that BCHD has relied upon must be deleted from the record, BCHD must provide a sound, impartial basis for any further action on RCFE, PACE and MC, and KeyBanc must be dismissed, notwithstanding any exit fees that BCHD Board may have foolishly authorized to KeyBanc.

MN33-1  
(cont.)

Further, by approving an additional \$1.8M contract to KeyBanc, BCHD has demonstrated its continuing malfeasance based on acceptance of KeyBanc's quantitative analysis. That analysis is from a vendor that ONLY stands to benefit from a favorable deal view, and this \$1.8M is additional evidence of BCHDs lack of fiduciary responsibility on behalf of its taxpayer-owners. It's becoming increasingly clear that BCHD Board and management will cut whatever corners are necessary to force through their 103-foot tall, \$12,000+ per month rent assisted living, even hiring a single, self-interested vendor to provide recommendations to proceed and paying that vendor rich continuing deal fees. And this is all despite the fact that less than 20% of tenants are expected to be from the 3 Beach Cities and only 8% are expected to be from Redondo Beach, the City with the vast majority of the Environmental and Economic Justice burdens from the 5 years of construction and 50-100 years of continued operation.

Mark Nelson  
3+ Year BCHD Volunteer  
Redondo Beach

cc: LALafco record, Media  
bcc: Interested Parties  
further follow-up to LALafco with Documents

FN#1 From BCHD CPRA Response  
Excerpt from a BCHD CPRA Response:  
Development Transaction Fee: For each Transaction consummated as documented by a definitive agreement signing, the District shall pay Cain Brothers in cash, upon the closing of such Transaction by wire transfer payable to Cain Brothers in immediately available funds at such closing, a Development Transaction Fee equal to \$200,000 for such Transaction, net of any previously paid Letter of Intent Fee for that same Transaction.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:18 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD Board Comment

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Monday, April 26, 2021 11:58 PM  
**To:** Communications <Communications@bchd.org>  
**Cc:** Judy Rae <easyreader@easyreadernews.com>; Lisa Jacobs <lisa.jacobs@tbrnews.com>; letters@dailybreeze.com; letters@latimes.com; cityclerk@redondo.org; citycouncil@hermosabeach.gov; cityclerk@citymb.info; CityClerk@torranceca.gov; Vanessa I. Poster <Vanessa.Poster@bchd.org>; Jane Diehl <Jane.Diehl@bchd.org>; Noel Chun <Noel.Chun@bchd.org>; Martha Koo <Martha.Koo@bchd.org>; Michelle Bholat <Michelle.Bholat@bchd.org>; Brandy Forbes <brandy.forbes@redondo.org>; Martinez, Oscar <OMartinez@torranceca.gov>  
**Subject:** BCHD Board Comment

Public Comment to BCHD Board and Mayors and City Councils of Torrance, Hermosa, Manhattan and Redondo Beach:

Throughout BCHDs development process, BCHD has behaved unethically to the surrounding neighborhoods, the BCHD-organized Community Working Group, and over 1,200 petition signing residents and neighbors. We have likely come to the point where BCHD cannot be salvaged and should be dissolved.

### **First Set of Secret Negotiations**

MN34-1 While BCHD was actively engaged with the Community Working Group of volunteers, BCHD was secretly negotiating with the Redondo Beach City Attorney. Furthermore, in February of 2019, BCHD had its outside law firm issue a memo to the City Attorney documenting the secret negotiations and then BCHD withheld the letter from the public and from the Community Working Group until July of 2020 (nearly 18 months of hiding), and waited a full month after BCHD approved its own project. Open, transparent negotiations are not hidden from working groups or from the public for 18 months after documents are issued.

### **Only Three Business Days of Public Input Allowed Before Project Approval**

MN34-2 BCHD blindsided the public and its volunteers with a revised project plan after business hours on Friday, June 12, 2020. BCHD allowed only three business days of public review and comment prior to Board approval of the nearly one-half Billion dollar project on June 17, 2020. A project that began in 2009 should not be approved in a never before seen design in only 3 business days.

### **Increased the Size and Height of the Project following Residents' Concern about the Over-sized Project**

MN34-3 Over 1,200 residents signed a petition opposing BCHD's 60-foot tall, 729,000 sqft of surface buildings project plan that was released in 2019. That plan contained 160,000 sqft of underground parking. In response to that large neighborhood resident outpouring, BCHD increased the height from 60-feet to 103-feet, moved the underground parking to surface ramp at Prospect and Diamond, and increased the project's surface buildings by over 60,000 sqft to 793,000 sqft. BCHD demonstrated a total lack of concern for the input of its owners.

### **Second Set of Secret Negotiations**

MN34-4 In order to avoid a Conditional Use Permit hearing, BCHD secretly approached the City of Redondo Beach to change the land use designations according to a Board member's public meeting. For the second time, BCHD bypassed the public

MN34-4 (cont.) and negotiated in the shadows, misrepresenting a \$12,000+ per month assisted living that will be built, majority-owned and operated by a commercial developer as "public". This is clearly NOT a public asset and BCHD has yet again taken to the shadows.

#### **Deliberate Avoidance of Affordable Assisted Living**

MN34-5 BCHD does not plan to develop "public" assisted living. It is merely planning to provide land to a commercial developer so that the developer can build, be majority owner, and operate the facility. At an estimated \$12,000+ per month, BCHDs consultants published expected tenancy rates of only 8% Redondo Beach residents. Redondo Beach residents are being forced to host the facility for 50-100 years and absorb 100% of the Environmental and Economic Justice damages. Less than 20% residents of all three Beach Cities that own and operate BCHD combined are expected to be tenants. Thus, this "public" facility is being built for 80% non-residents of the three Beach Cities and 92% non-residents of Redondo Beach. The BCHD Board ordered the CEO to use a commercial developer. BCHD bypassed the use of public, tax-free bonds coupled with a public, tax-free, non-profit operation that could easily yield an affordable facility. Instead BCHD is spending nearly \$2M with investment bankers to find a commercial developer to extract \$150,000 annually from wealthy NON-RESIDENTS.

MN34-6 Taken individually and together, BCHD has acted unethically toward its concerned taxpayer-owners and surrounding residents. No zoning change or redefinition should be allowed on this non-public benefit project that would then reward BCHD ethical lapses.

Mark Nelson  
3+ Year Community Working Group volunteer  
Redondo Beach

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:18 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD Negative Impact on the Community - cardiovascular effects, children's health, environmental health, environmental noise, hearing impairment, noise exposure, noise metrics, occupational noise, performance

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Wednesday, April 28, 2021 7:10 PM  
**To:** Communications <Communications@bchd.org>  
**Cc:** Jane Diehl <Jane.Diehl@bchd.org>; Martha Koo <Martha.Koo@bchd.org>; Michelle Bholat <Michelle.Bholat@bchd.org>; Noel Chun <Noel.Chun@bchd.org>; Vanessa I. Poster <Vanessa.Poster@bchd.org>  
**Subject:** BCHD Negative Impact on the Community - cardiovascular effects, children's health, environmental health, environmental noise, hearing impairment, noise exposure, noise metrics, occupational noise, performance

Cristan is right, BCHD does have an impact on the community, a negative impact.

See the peer-reviewed article below about the PUBLIC HEALTH HAZARD that excessive noise is. Clearly BCHD has no concern about the health of the surrounding neighborhoods.

<https://ehp.niehs.nih.gov/doi/pdf/10.1289/ehp.00108s1123>

MN35-1 Exposure to noise constitutes a health risk. There is sufficient scientific evidence that noise exposure can induce hearing impairment, hypertension and ischemic heart disease, annoyance, sleep disturbance, and decreased school performance. For other effects such as changes in the immune system and birth defects, the evidence is limited. Most public health impacts of noise were already identified in the 1960s and noise abatement is less of a scientific but primarily a policy problem. A subject for further research is the elucidation of the mechanisms underlying noise induced cardiovascular disorders and the relationship of noise with annoyance and nonacoustical factors modifying health outcomes. A high priority study subject is the effects of noise on children, including cognitive effects and their reversibility. Noise exposure is on the increase, especially in the general living environment, both in industrialized nations and in developing world regions. This implies that in the twenty-first century noise exposure will still be a major public health problem. Key words: annoyance, cardiovascular effects, children's health, environmental health, environmental noise, hearing impairment, noise exposure, noise metrics, occupational noise, performance. -



## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:18 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD is deliberately choosing to impact the learning of both neurotypical and children with disabilities at Towers Elementary

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Wednesday, April 28, 2021 7:29 PM  
**To:** Communications <Communications@bchd.org>  
**Cc:** Noel Chun <Noel.Chun@bchd.org>; Vanessa I. Poster <Vanessa.Poster@bchd.org>; Martha Koo <Martha.Koo@bchd.org>; Michelle Bholat <Michelle.Bholat@bchd.org>; Jane Diehl <Jane.Diehl@bchd.org>  
**Subject:** BCHD is deliberately choosing to impact the learning of both neurotypical and children with disabilities at Towers Elementary

### Abstract

The present paper provides an overview of research concerning both acute and chronic effects of exposure to noise on children's cognitive performance. Experimental studies addressing the impact of acute exposure showed negative effects on speech perception and listening comprehension. These effects are more pronounced in children as compared to adults. Children with language or attention disorders and second-language learners are still more impaired than age-matched controls. Noise-induced disruption was also found for non-auditory tasks, i.e., serial recall of visually presented lists and reading. The impact of chronic exposure to noise was examined in quasi-experimental studies. Indoor noise and reverberation in classroom settings were found to be associated with poorer performance of the children in verbal tasks. Regarding chronic exposure to aircraft noise, studies consistently found that high exposure is associated with lower reading performance. Even though the reported effects are usually small in magnitude, and confounding variables were not always sufficiently controlled, policy makers responsible for noise abatement should be aware of the potential impact of environmental noise on children's development.

**Keywords:** noise, cognitive performance, cognitive development, children, speech perception, listening comprehension, irrelevant sound effect, classroom acoustics

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3757288/>

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:18 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: CPRA - Seismic statement

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, April 29, 2021 10:25 AM  
**To:** PRR <PRR@bchd.org>  
**Subject:** Re: CPRA - Seismic statement

Absent a reply to this specific CPRA request, the public's right to intelligent participation in the CEQA process will be denied.

On Sun, Mar 7, 2021 at 11:27 PM Mark Nelson (Home Gmail) <[menelson@gmail.com](mailto:menelson@gmail.com)> wrote:

Provide the specific Youssef citation for ". This occurred after seismic experts provided analysis and preliminary costs that concluded no legal obligation exists to address any building's structural integrity, but there were issues that **should** be addressed."

From the BCHD website at: <https://www.bchdcampus.org/our-story>

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:19 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: CPRA - Bakaly Quote

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, April 29, 2021 10:24 AM  
**To:** PRR <PRR@bchd.org>  
**Subject:** Re: CPRA - Bakaly Quote

The information put into the CEO report and presented at the 4/28/21 Board meeting has no mention of causality. Therefore, this CPRA request is still valid.

Failure to respond will prevent intelligent participation of the public in the DEIR process.

MN38-1 On Fri, Apr 2, 2021 at 12:00 PM Mark Nelson (Home Gmail) <[menelson@gmail.com](mailto:menelson@gmail.com)> wrote:

"Data shows that engaging in our Blue Zones Project programming has a positive impact on well-being," says Tom Bakaly, CEO for Beach Cities Health District.

Provide the specific data and evidence that the BCHD implementation of the Blue Zone Project activity was the driver of the increases in [well-being.as](#) claimed above.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:19 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Inquiry on submission of DEIR comments

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Friday, April 30, 2021 3:17 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Fwd: Inquiry on submission of DEIR comments

MN39-1 Our team has a roughly 100MB submission to make as comments. Clearly it cannot be emailed. Do you want a link to it, in the same fashion that you provided a link to the DEIR?

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:20 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: PRR #317 - Provide "Moral Obligation" Standards for the Following - Response

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Friday, April 30, 2021 6:41 PM  
**To:** PRR <PRR@bchd.org>  
**Subject:** Re: PRR #317 - Provide "Moral Obligation" Standards for the Following - Response

MN40-1 Notwithstanding BCHDs insatiable lust to demolish the 514 failed South Bay Hospital building despite the lack of requirement from any ordinance or statute; BCHDs selective "moral obligation" to "protect the community" beyond the requirements of statute or regulation that applies only to the residents, tenants and staff in the 514 failed South Bay Hospital building; BCHDs abject refusal to consider low-cost, tax-free bond financing approved by voters to make affordable the cost of its proposed RCFE and PACE operations to local residents; and BCHDs near coma-inducing sloth in replying to California Public Records Act (CPRA) requests related to its nearly \$500M proposed 103-foot tall, 800,000 sqft development and general mismanagement; I bring forward this formal public request under the CPRA:

Following review of BCHDs response, I find it to be non-responsive. The CEQA document is delinquent in its written standards in general for the evaluation of impacts. Furthermore, it has no discussion of moral obligation, as was used by Bakaly to justify proposed demolition and the "unsafe" declaration of the failed South Bay Hospital.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:22 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD Board Comment

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Friday, April 30, 2021 1:29 PM  
**To:** Communications <Communications@bchd.org>  
**Cc:** letters@dailybreeze.com; letters@latimes.com; Bill Brand <bill.brand@redondo.org>; PFurey@torranceca.gov  
**Subject:** BCHD Board Comment

BCHD Negligence Allowing 4kV Next to Residences and Failing to Analyze the Health Impacts - Failure of Moral Obligation

I just couldn't be less surprised that BCHD is refusing to analyze the health impacts of its 4,180 Volt high voltage substation transformers that will be directly across from residences on Diamond St as part of BCHDs 103-foot tall, 800,000 sqft overdevelopment. Beach Cities Health District is, by its inactions, NOT really a HEALTH District. CEO Bakaly stated that the district has a MORAL OBLIGATION to protect the community. Apparently the community members directly adjacent to BCHD don't receive BCHDs MORAL OBLIGATION protection.

4kV (4,180V) is very dangerous and should not be directly next to residences. BCHD has a 10 acre campus and should have been sufficiently concerned to protect residents by placing the transformer internal to the facility.

Below is an article about the deaths of 2 people who were electrocuted by 4kV after simply walking onto wet grass adjacent to a 4kV transformer and fallen line to help a car accident victim. Replace BCHDs typical landscape overwatering and runoff onto Prospect and down Diamond for the broken fire hydrant and you have a ready death situation. The water stream from BCHD overwatering will cascade directly past the 4kV substation that will be 50-feet from homes.

<https://www.dailynews.com/2014/07/16/in-valley-village-electrocution-deaths-glendale-driver-sentenced-to-probation-community-service/>

A 21-year-old Glendale man whose car toppled a light pole and a fire hydrant in 2012 was sentenced to three years probation Wednesday in connection with the electrocution deaths of two good Samaritans who had tried to help in the aftermath.

Arman Samsonian's sentence in a Van Nuys courtroom came two months after he pleaded no contest to one count of vehicular manslaughter. In addition to three years probation, he also will have to serve 70 days of community labor and pay restitution to both victims.

A restitution amount has yet to be determined, said Ricardo Santiago, a spokesman for the Los Angeles County District Attorney's Office.

Samsonian also must enter a program where he will have to volunteer at a hospital morgue, according to the District Attorney's Office.

Stacey Lee Schreiber, 39, of Valley Village, and Irma Zamora, 40, of Burbank, died at the corner of Magnolia Boulevard and Ben Avenue in Valley Village. The two women didn't know each other, but were electrocuted the evening of Aug. 22 when they came to Samsonian's aid.

MN41-1  
(cont.)

Samsonian, then 19, was racing down a street in his father's Chevrolet Traverse when he lost control and clipped a fire hydrant and knocked down an old-fashioned light pole in the Valley Village neighborhood. The crash created a pool of electrified water, at least 4,000 volts, into which the two women stepped. Several others, including a police officer, were injured as well.

Family members of Schreiber and Zamora filed lawsuits against the City of Los Angeles and the Los Angeles Department of Water and Power last year, claiming that the women's deaths also were a result of the proximity of the hydrant to the pole. Those lawsuits remain active.



## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:22 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: CPRA - Rejected No Project Alternative

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**From:** PRR <PRR@bchd.org>  
**Sent:** Monday, May 3, 2021 2:23 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** FW: CPRA - Rejected No Project Alternative

---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Monday, May 3, 2021 2:21 PM  
**To:** PRR <PRR@bchd.org>  
**Subject:** CPRA - Rejected No Project Alternative

***Notwithstanding BCHDs insatiable lust to demolish the 514 failed South Bay Hospital building despite the lack of requirement from any ordinance or statute; BCHDs selective “moral obligation” to “protect the community” beyond the requirements of statute or regulation that applies only to the residents, tenants and staff in the 514 failed South Bay Hospital building; BCHDs abject refusal to consider low-cost, tax-free bond financing approved by voters to make affordable the cost of its proposed RCFE and PACE operations; and BCHDs near coma-inducing sloth in replying to California Public Records Act (CPRA) requests related to its nearly \$500M proposed 103-foot tall, 800,000 sqft development and general mismanagement; I bring forward this formal public request under the CPRA:***

With Reference to:

### 5.4 ALTERNATIVES CONSIDERED BUT REJECTED FROM FURTHER ANALYSIS

#### Upgrade the Beach Cities Health Center (No Seismic Retrofit)

This alternative would involve interior renovation of the Beach Cities Health Center, including demolition of interior walls, upgrades to existing electrical and plumbing systems, and reconfiguration of interior space to better accommodate potential tenants. This alternative would not include retrofits to address seismic-related structural deficiencies and potential public safety hazards due to the infeasible financial cost of such retrofits. However, the interior renovation of the Beach Cities Health Center would address other existing maintenance issues (e.g., outdated electrical and plumbing systems) and would provide space configurations that would be better suited for potential tenants.

Upgrade of the Beach Cities Health Center would require BCHD to end existing leases with the current tenants in order to allow the time and space necessary to complete the renovations. The financial investment required to renovate the Beach Cities Health Center, along with the long-term or permanent end to existing leases, would be financially infeasible for BCHD. Therefore, this alternative would require a substantial reduction in the level of existing community health and wellness programs and services provided by BCHD. Upgrade

of the Beach Cities Health Center would not meet any of the Project Objectives, including eliminating seismic safety hazards of the Beach Cities Health Center or providing public open space to accommodate community health programs.

CPRA Request:

- 1) Provide all analysis documents of specific changes required to "accommodate future tenants"
- 2) Provide all subsequent analysis documents of the cost of those documented specific changes
- 3) Provide all analysis documents of the specific conditions of existing plumbing and electrical asserted to outdated
- 4) Provide all subsequent analysis documents of the cost of those documented, specific updates
- 5) Provide all analysis documents of incremental or rolling remodel that does not require termination of leases
- 6) Provide all subsequent analysis documents of the cost comparison of incremental/rolling remodel vs. BCHD defective strategy of ending all leases
- 7) Provide all analysis documents of the impacts on health and wellness services asserted by BCHD to be "substantially reduced"

Absent a timely reply, the public's ability for intelligent participation in BCHD CEQA DEIR will be denied.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:23 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: CPRA - California Code, Health and Safety Code - HSC § 32121

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Tuesday, May 4, 2021 12:06 PM  
**To:** PRR <PRR@bchd.org>  
**Subject:** CPRA - California Code, Health and Safety Code - HSC § 32121

Notwithstanding BCHDs insatiable lust to demolish the 514 failed South Bay Hospital building despite the lack of requirement from any ordinance or statute; BCHDs selective “moral obligation” to “protect the community” beyond the requirements of statute or regulation that applies only to the residents, tenants and staff in the 514 failed South Bay Hospital building; BCHDs abject refusal to consider low-cost, tax-free bond financing approved by voters to make affordable the cost of its proposed RCFE and PACE operations; and BCHDs near coma-inducing sloth in replying to California Public Records Act (CPRA) requests related to its nearly \$500M proposed 103-foot tall, 800,000 sqft development and general mismanagement; I bring forward this formal public request under the CPRA:

Provide the specific passage in 32121 that BCHD relies upon to authorize RCFE. RCFE is non-medical care per [https://www.aging.ca.gov/Care\\_Options/Assisted\\_Living\\_Facilities/#:~:text=An%20RCFE%20provides%20non%2Dmedical,60%20who%20have%20similar%20needs](https://www.aging.ca.gov/Care_Options/Assisted_Living_Facilities/#:~:text=An%20RCFE%20provides%20non%2Dmedical,60%20who%20have%20similar%20needs)

"An RCFE provides **non-medical care and supervision** for persons 60 years or older who may need assistance with activities of daily living. RCFE residents should not require on-going medical assistance from facility staff. RCFEs may also serve persons under the age of 60 who have similar needs. RCFEs may care for individuals who have dementia if the facility is adequately equipped and staff are trained and sufficient to meet the needs of all residents." (emphasis in the definition as reproduced)

and the only authorization in 32121 is for Medical Care, no non-medical, residential housing is authorized.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:23 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: CPRA - Provide diagrams absent non-existent foliage

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

---

**From:** PRR <PRR@bchd.org>  
**Sent:** Wednesday, May 5, 2021 6:25 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** FW: CPRA - Provide diagrams absent non-existent foliage

---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Wednesday, May 5, 2021 4:48 PM  
**To:** PRR <PRR@bchd.org>; eir@bhd.org  
**Subject:** CPRA - Provide diagrams absent non-existent foliage

This is both a CPRA request and an EIR Comment

The unnumbered diagram/illustration on 3.1-51 is defective and misleading. None of the foliage currently exists, or, will not be removed in construction. Therefore, absent a surety bond for replacement with mature, 30-50 foot tall foliage, the illustrations are deliberately deceptive and misleading and represent an attempt to mislead the public.

MN44-1 CPRA Request

***Notwithstanding BCHDs insatiable lust to demolish the 514 failed South Bay Hospital building despite the lack of requirement from any ordinance or statute; BCHDs selective "moral obligation" to "protect the community" beyond the requirements of statute or regulation that applies only to the residents, tenants and staff in the 514 failed South Bay Hospital building; BCHDs abject refusal to consider low-cost, tax-free bond financing approved by voters to make affordable the cost of its proposed RCFE and PACE operations; and BCHDs near coma-inducing sloth in replying to California Public Records Act (CPRA) requests related to its nearly \$500M proposed 103-foot tall, 800,000 sqft development and general mismanagement; I bring forward this formal public request under the CPRA:***

All diagrams in the DEIR that contain non-existent mature foliage are defective, deliberately deceptive and misleading to the public. Provide all such diagrams absent the misleading foliage.



*View of Central Driveway along North Prospect Avenue*



*View from Secondary Driveway on North Prospect Avenue*



*View from North Prospect Avenue & Diamond Street*



*View from Flagler Lane & Towers Street*

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

#### DEIR Comment

All diagrams and illustrations in the DEIR that contain non-existent mature foliage are defective, deliberately deceptive and misleading to the public. Unfortunately, they do not carry illustration numbers to reference. I have embedded an example. The DEIR is misleading and defective and must be repaired and recirculated.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:24 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Table 1-2 is in deliberately false and misleading

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---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, May 6, 2021 12:32 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Table 1-2 is in deliberately false and misleading

Table 1-2 fails to include that BCHD increased the height of the project from 60-feet (2019) to 75-feet (2020) to 103-feet (2021). Thus BCHD increased the height of the project from 60 feet to 103 feet from 2019 to 2021 in response to public comments that the complex was too tall.

Table 1-2 fails to recognize that BCHD removed 160,000 sqft of below ground parking and moved it to a 10-1/2 story surface parking ramp. Thus BCHD increased the sqft of surface buildings from 729,000 sqft to 793,000 sqft from 2019 to 2021 in response to public comments that the complex was too large.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:24 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Areas of Known Controversy Discussion Deliberately Ignores 1,200+ Resident Petition

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---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, May 6, 2021 12:34 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Areas of Known Controversy Discussion Deliberately Ignores 1,200+ Resident Petition

MN46-1 The 1,200+ resident petition is the single largest comment ever received by BCHD, yet, it went ignored by the CEO and Board. As such, BCHD has deliberately misstated the Areas of Known Controversy in order to mislead the public. The DEIR is defective, must be remedied and recirculated.



## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:24 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD Materially Misrepresents the Height of the 514 Building

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---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, May 6, 2021 12:57 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** BCHD Materially Misrepresents the Height of the 514 Building

BCHD continually claims that the relevant height of the 514 building is 75-feet. Only 968-sqft of the building is 75-feet, per CPRA responses. That represents only 0.3% of the entire campus. BCHD wrongfully withholds that information from the public.

MN47-1 Further, the overwhelming majority of the 514 building is below 50-feet, and the average height is in the 30-35 foot range. Per precedent of the recent permitting actions of the City of Redondo Beach, the average height is the relevant metric for the 514 building and any future construction.

The DEIR and design are defective, must be remedied, and the DEIR recirculated.

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:24 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: DEIR is defective and must be remedied and recirculated - failure to consider Beryl Heights Neighborhood Specific design guidelines  
**Attachments:** RB Beryl Heights chapter\_iii\_neighborhood\_specific\_guidelines.pdf

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, May 6, 2021 12:52 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** DEIR is defective and must be remedied and recirculated - failure to consider Beryl Heights Neighborhood Specific design guidelines

BCHDs DEIR design is in clear violation of Beryl Heights design guidelines. In order to conform to the surrounding neighborhoods for issuance of a CUP and Planning Commission approval, and to avoid subsequent litigation, BCHD DEIR and design must be remedied and recirculated. The current design by BCHD is devastating to the "character of the neighborhood."

MN48-1

## A. Introduction

Attempting to protect the “character of the neighborhood” presents a difficult task. The first step in the process is understanding what features give the neighborhood its unique character. This may include many elements such as the size of homes, the year the homes were built, the architectural character of homes, setback areas, the character of the street and parkways, landscaping, the location of garages, etc.

In Redondo Beach, most homes were developed as subdivisions, each with its own unified character, fifty to eighty years ago. As these homes age, there is increasing pressure to replace the older homes with larger, newer, different types of houses. This poses a dilemma in determining the extent to which new development should remain compatible with older homes or transition to a new neighborhood character.

The City has selected two neighborhoods that have a majority of their existing neighborhood character intact, where it is appropriate for new development to respect and contribute to the existing character of the neighborhood (see map below).

The neighborhood referred to as “The Avenues” includes two separate single-family areas divided by Pacific Coast Highway south of Knob Hill Avenue.

The single-family neighborhood between Del Amo Street and Anita Street just west of Prospect Avenue does not have a recognized name, but will be referred to as the “Beryl Heights” neighborhood in this document, consistent with the name of the elementary school serving this neighborhood.

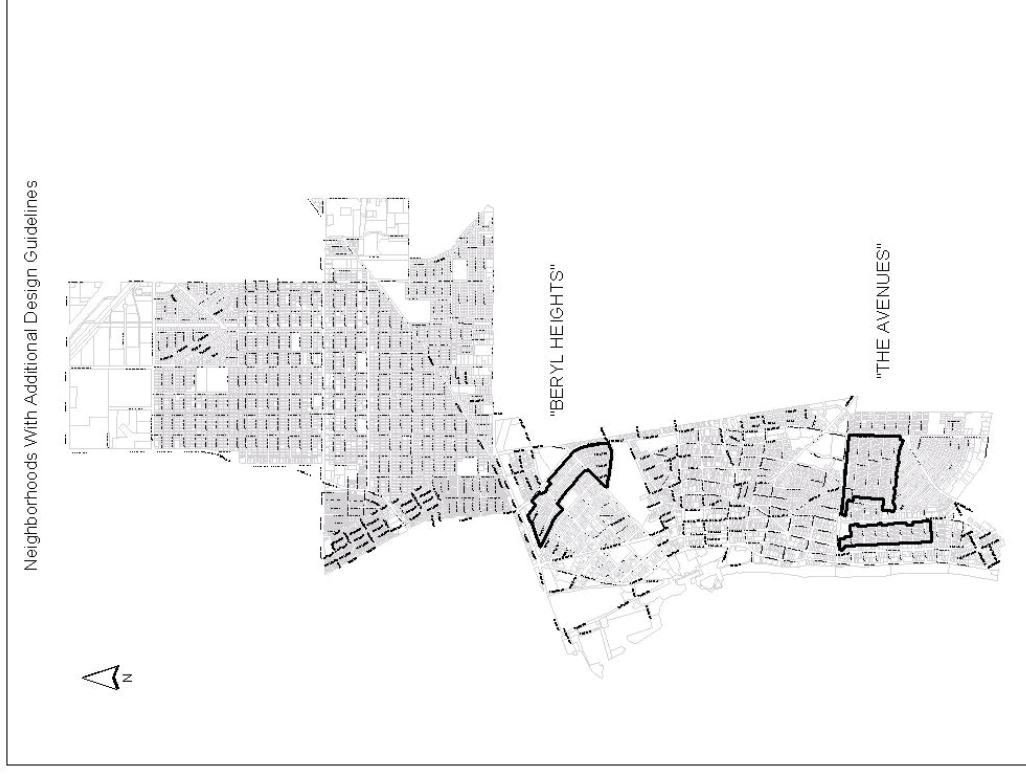


Exhibit III-1 – Neighborhoods

## **B. “The Avenues”**

### **1. Major Identifying Features and Characteristics**

“The Avenues” includes about 550 homes located in the southern part of the City. When originally built, the homes were typically under 1,000 square feet. Today most homes still have between 1,000 and 2,000 square feet of living space. However, some of the homes in the neighborhood have either been torn down and replaced by larger size homes or have had major additions. 70 homes now exceed 3,000 square feet of living area, including 14 homes exceeding 4,000 square feet and 3 homes exceeding 5,000 square feet.

The area west of Pacific Coast Highway retains many of the original homes built in the 1920s. This area is unique for its wide parkways and consistent use of alleys for garage access. The typical lot in this area is approximately 42 feet by 142 feet, or just under 6,000 square feet of lot area.

The area east of Pacific Coast Highway is more eclectic. It includes a smaller number of homes built in the 1920s mixed in with a majority of homes built in the 1940s and early 1950s. Although there is not consistent use of the alleys for garage access, most of the lots are served by a detached garage in the rear. Lots in this area are typically 40 feet by 152 feet (just over 6,000 square feet), except along Avenue D where most lots are 50 feet by 152 feet (about 7,600 square feet).



Exhibit III-2 – “The Avenues”





New construction or additions should respect the scale of adjacent structures.



Alley-loaded garages are required west of PCH and encouraged east of PCH .



The second story should be setback from the street.



Tree-lined streets with parkways are encouraged.

## **2. Neighborhood Specific Design Guidelines**

The characteristics of “The Avenues” as discussed above should be considered in the application of the city-wide guidelines in Chapter II. It is also intended that positive attributes unique to “The Avenues” be reinforced as reflected in the following guidelines.

- A. The architecture and intensity of new residential development should respect the character and scale of older residences within the neighborhood.
- B. New curb cuts are prohibited west of Pacific Coast Highway where alley access is available between Avenue A and Avenue G. Where there is an existing curb cut in this area, the curb shall be restored and driveway apron removed when the existing home is demolished and replaced with a new home.
- C. East of Pacific Coast Highway, alley access for garages is strongly encouraged but not required. A rear-loaded garage accessed by a driveway along the side of the lot is also acceptable. Front facing garages are out of character with the neighborhood and are strongly discouraged in this area.
- D. Homes with front porches and gable roofs facing the street are strongly encouraged, as these features are characteristic of this neighborhood.
- E. The neighborhood includes wide landscaped parkways providing pedestrian-friendly paths to the beach that are buffered from street traffic. Parkway should remain landscaped and the consistent character of existing grassy

parkways should be maintained. Limited use of pavers, bricks, and pervious materials for walkways is acceptable in these parkways. Any modifications to parkways requires approval of the Superintendent of Parks.

- F. Architectural features found on neighboring historic homes are encouraged to be incorporated into the design of new construction.
- G. West of Pacific Coast Highway, no roof decks or mezzanines shall be permitted above the second floor, as these features are out of character with this area.
- H. West of Pacific Coast Highway, front yard fences are strongly discouraged, as fences are out of character with the open landscaped quality of this area.







Rear loaded garages are encouraged (in portions of the neighborhood alley-loaded garages are required by the Zoning Ordinance).



Reduce paved surfaces within the front yard area.



Second floors should be setback to minimize the perception of bulk



Front yard fencing should be as transparent as possible.

## **2. Neighborhood Specific Design Guidelines**

The characteristics of the “Beryl Heights” neighborhood as discussed above should be considered in the application of the city-wide guidelines in Chapter II. In addition, sloping lots are common in this neighborhood, and therefore the following supplemental guidelines are intended to emphasize the need to give particular attention to impacts of topography on the appearance of bulk and maintenance of privacy.

- A. Residential structures on sloping lots tend to look more massive due to the viewing grade. Therefore attention should be given to reducing the perception of bulk.
- B. Avoid tall walls above the first floor by stepping the floor level with the grade.
- C. Minimize use of tall or two-story design elements, such as towers, two-story entryways, turrets, etc.
- D. When considering alternative locations for windows, decks, and balconies, it is important to consider solutions that help maintain privacy between neighboring properties.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:24 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD Lead Agency Description is Defective, must be Remedied, and the DEIR must be Recirculated

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, May 6, 2021 1:36 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** BCHD Lead Agency Description is Defective, must be Remedied, and the DEIR must be Recirculated

BCHD fails to provide any evidence of being "leading preventative health agency [sic]." Therefore the statement must be removed. BCHD has failed to conduct program level budgeting, cost-accounting or cost-effectiveness analysis since its inception in 1993.

BCHD statement of 1955 is plainly false. Per BCHD CPRA responses, BCHD came into existence in 1993 from the wreckage of the failed South Bay Hospital District.

BCHD is malfeasant for spending scarce taxpayer funding outside the 3 Beach Cities that fund BCHD. Therefore, BCHD clearly is not a leading agency, except in malfeasance.

The description below is materially misleading and deceptive - and contains several typos and grammar failures.

### 1.2 LEAD AGENCY

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

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:25 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Table 3.1-1 is Deceptive, Misleading, and in Error

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---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, May 6, 2021 1:41 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Table 3.1-1 is Deceptive, Misleading, and in Error

Redondo Beach is the permitting authority for the CUP and any other building and discretionary permits. As such, the table is clearly in error.

The only relevant heights are for the 7 P-CF structures in Redondo Beach, all other data must be removed from the defective table. Furthermore, BCHD draws the incorrect conclusion from its own table. The correct conclusion is that buildings over 70-feet have been banned by practice in Redondo Beach since 1980.

This table is deceptive, misleading and in error. It must be remedied and the DEIR recirculated.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:25 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Page 3.1-40 is unsupported and objectively false

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---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, May 6, 2021 1:56 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Page 3.1-40 is unsupported and objectively false

A 103-foot building on a 30-foot bluff does, in fact, have significant open-sky, glare, noise reflection, neighborhood character, visual and aesthetic impacts. BCHDs statement:

Page 3.1-40 - disagree with "The majority of the RCFE Building would be obstructed by the single-family residences and large trees in the foreground. Additionally, the vast majority of the open sky views above the single-family residences would remain. Therefore, the implementation of the Phase 1 preliminary site development plan would not substantially degrade the visual character or quality of the Project site and surrounding area when viewed from the public realm at this location."

Is unsupported and false. As part of the surrounding residential land use, visual character will be degraded, as will neighborhood characteristics per the Beryl Heights published design guidelines.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:25 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Toxic Air Contaminants

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---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, May 6, 2021 6:08 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Toxic Air Contaminants

MN52-1 I see no mitigation or management plan for second hand smoke, a toxic air contaminant under State law, and a banned emission on any public sidewalks or streets in Redondo Beach. BCHD ignores the RBMC and forces their addiction groups to smoke on the sidewalk, illegally, in front of the 514 building. This same lawbreaking cannot occur during construction with workers. BCHD DEIR fails to consider second hand smoke as a Toxic Air Contaminant and the RBMC prohibiting smoking on public streets, sidewalks, parks, etc. The DEIR is defective, must be remedied, and must be recirculated.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:25 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: The following BCHD assertion is in accurate

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---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, May 6, 2021 6:17 PM  
**To:** Communications <Communications@bchd.org>; EIR <eir@bchd.org>  
**Subject:** The following BCHD assertion is in accurate

BCHD did not provide the CWG the ability to comment nor verify the private notes that BCHD took in the meetings. The following is simply inaccurate and Bakaly knows it. I repeatedly in public and in private asserted that there was no need to retrofit. This is your only notice to remove your inaccuracy.

Dency Nelson and Bruce Steele stated that the focus should be "Safety First." Jean Lucio, Mark Nelson and Jan Buike all stated they agreed with Dency and Bruce, according to the Summary Report.



## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:26 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD DEIR contains false statements - "public safety hazard" is never mentioned in the 2018 Youssef report

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, May 6, 2021 6:25 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** BCHD DEIR contains false statements - "public safety hazard" is never mentioned in the 2018 Youssef report

[https://www.bchdcampus.org/sites/default/files/archive-files/514%20Building\\_Structural%20Cost\\_Seismic%20Evaluation%20Info.pdf](https://www.bchdcampus.org/sites/default/files/archive-files/514%20Building_Structural%20Cost_Seismic%20Evaluation%20Info.pdf)

BCHD asserts on Page 4-2:

"Additionally, the South Bay Hospital is over 60 years old, does not meet the current seismic requirements of the California Building Code (CBC), and presents a public safety hazard (Nabih Youssef and Associates Structural Engineers 2018). "

MN54-1 First, of course it fails to meet current requirements. So does most of the housing stock surrounding the failed South Bay Hospital. Does BCHD suggest it all be demolished. There is no logical or engineering relationship between current codes and existing buildings.

Second, while BCHD attempts to cite a reference, that reference does not contain BCHD assertion. Furthermore, if there is a public safety hazard, and BCHD is allowing current use of the building, then BCHD should self-report to the state, county and city that it is in violation of public safety via its own actions.

This is plainly a false statement, the DEIR is defective, and must be corrected and recirculated as this is a material error to deceive the public.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:26 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: The Project Alternatives are Incorrectly Stated Resulting in a Defective DEIR

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---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, May 6, 2021 6:34 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** The Project Alternatives are Incorrectly Stated Resulting in a Defective DEIR

Development on an Alternative Site

MN55-1 BCHD misrepresents this alternative and games the CEQA process by forming project objectives that require BCHD to be in the City. BCHD facility does not need to be in the 3 beach cities, nor does it need to be on a common campus. BCHDs executive team is currently occupying rental space offsite and operations continue without them. 80% of RCFE tenancy is from outside the district, and likely a similar rate of PACE, as such, there is no need for a location in the district. In fact, the environment is being damaged excessively by requiring the facility to be Redondo Beach where only 8% of tenants are likely to be drawn from. Other locations would have lesser environmental impacts and be closer to the future tenants. The health district statute does not require the facility to be in the cities. BCHD is plainly and simply gaming CEQA through overly restrictive Project Objectives. The DEIR is in violation of CEQA, must be remediated, and recirculated.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:26 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: The Project Alternatives are Incorrectly Stated and the DEIR is Defective

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, May 6, 2021 6:37 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** The Project Alternatives are Incorrectly Stated and the DEIR is Defective

### Alternative 2 - Sale and Redevelopment

Since there is no demonstrated need for BCHD to be in the 3 beach cities, sale and development in a lower cost, more commercial area without residential impacts is reasonable, required, cost effective and appropriate for the 80% non-residents in RCFE and PACE. BCHD took over the properties and assets of the failed South Bay Hospital absent any public approval, and now plans to build a facility with 100% impacts in 90277 and less than 5% benefits. The net impact is clearly negative to Redondo Beach residents.

MN56-1

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:27 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: There is a failure in consistent Project Alternatives data, numbering and presentation

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, May 6, 2021 6:39 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** There is a failure in consistent Project Alternatives data, numbering and presentation

MN57-1 The DEIR is incomprehensible. The public has no way to know what's being discussed regarding project alternatives due to material numbering and omission errors in the DEIR. The DEIR must be corrected and recirculated.

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:27 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: The so-called Pavilion is underdefined and fails to present an accurate, finite or stable definition

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, May 6, 2021 6:42 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** The so-called Pavilion is underdefined and fails to present an accurate, finite or stable definition

MN58-1 The DEIR is defective. Phase 2 is insufficiently described for a programmatic EIR, and clearly insufficient for a project. CEQA obligates BCHD to provide an accurate, finite and stable description and the Pavilion is outside of that required, court-imposed metric.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:24 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD DEIR is Defective - Areas of Known Controversy Deliberately Withheld from the Public  
**Attachments:** BCHD DEIR Known Controversy - by CEQA impact v4.pdf

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, May 6, 2021 12:48 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** BCHD DEIR is Defective - Areas of Known Controversy Deliberately Withheld from the Public

MN59-1 The DEIR is defective, must be remedied and recirculated due to the defect of failure to disclose significant areas of public controversy. Areas of controversy are attached, along with citations of peer-reviewed damages that BCHD ignored as a result of failing to include said areas of controversy.

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v azard00 azardou00 %ater al00	<p>M00e0otei'jY for e&lt;posure0q0 \$G3rdous000eriGw0F lud Y00ut0 not lY00fed to awbewos2 leGd-bGied p0erYv2000l, and other0 00fer Y0w0v0c Yjfed0/Y\$0je0 former Sout\$00 G00'bspYd wee SekY0n00"lPZH0zards and Hbzardoust bgr0als:1</p> <ul style="list-style-type: none"> <li>Poterj'Y0000 GkY0v0v0c Yjfed0/Y\$0 she0Pre-Yousl6 dekom00w0ned oil0 Gnd gaw0ell on the -GkGrf00Dgler Lot (e1012&lt;posure0 Jo ha3Grdous00wbWGrk ew00e0 SekY0n00"lPZH0zards and Hbzardoust bgr0als:1</li> <li>Poterj'Y0000 GkY0v0v0c Yjfed0/Y\$0 kontGDYGrj wfrom00Hkerj lGnd uvew(e1012 seJrakhloroeJhylene [PKE'0 Gwoc Yjfed0/Y\$0\$Yorikd dry- kleaf Yng operaY0ns00we SekY0n "lPZ00bzards and Hbzardoust bg Kr0als:1</li> </ul>	Koncerns re0Grdir0 0 nucleGrNadioGkY'e000YKd0 / Gwyep'-yy	
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- i [https://resources.ca.gov/CNRALegacyFiles/ceqa/docs/2019\\_CEQA\\_Statutes\\_and\\_Guidelines.pdf](https://resources.ca.gov/CNRALegacyFiles/ceqa/docs/2019_CEQA_Statutes_and_Guidelines.pdf)
- ii [http://bchdfiles.com/docs/hlc/BCHD\\_DEIR\\_For%20Print\\_031021.pdf](http://bchdfiles.com/docs/hlc/BCHD_DEIR_For%20Print_031021.pdf)
- iii <https://bchdcampus.org/communityworkinggroup>
- iv [https://www.bchdfiles.com/docs/bchd/BCHD%20Healthy%20Living%20Campus%20Master%20Plan\\_NOP\\_IS%20Checklist\\_062719.pdf](https://www.bchdfiles.com/docs/bchd/BCHD%20Healthy%20Living%20Campus%20Master%20Plan_NOP_IS%20Checklist_062719.pdf)
- v California Public Records Act response from BCHD “Charlie Velasquez <[Charlie.Velasquez@bchd.org](mailto:Charlie.Velasquez@bchd.org)> Thu, Dec 5, 2019, 6:02 PM”
- vi [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)
- vii <https://www.bchdcampus.org/faq>
- viii [https://www.youtube.com/watch?v=RCOX\\_GrreIY](https://www.youtube.com/watch?v=RCOX_GrreIY)
- ix [http://bchdfiles.com/docs/hlc/BCHD\\_DEIR\\_For%20Print\\_031021.pdf](http://bchdfiles.com/docs/hlc/BCHD_DEIR_For%20Print_031021.pdf)
- x [http://www.bchdfiles.com/docs/hlc/BCHD\\_HLC\\_scoping\\_comments\\_oct2.pdf](http://www.bchdfiles.com/docs/hlc/BCHD_HLC_scoping_comments_oct2.pdf)
- xi [https://bchd.granicus.com/DocumentViewer.php?file=bchd\\_4733c5665b9cb92bb847803b1c2e1459.pdf&view=1](https://bchd.granicus.com/DocumentViewer.php?file=bchd_4733c5665b9cb92bb847803b1c2e1459.pdf&view=1)
- xii Mark Nelson [menelson@gmail.com](mailto:menelson@gmail.com) BCHD HLC CWG Member July 29, 2019 EIR NOP Comment Processor [EIR@bchd.org](mailto:EIR@bchd.org) SUBJECT: Comments on NOP and Response to Public Meeting Presentations
- xiii Mark Nelson [menelson@gmail.com](mailto:menelson@gmail.com) BCHD HLC CWG Member July 29, 2019 EIR NOP Comment Processor [EIR@bchd.org](mailto:EIR@bchd.org) SUBJECT: Comments on NOP and Response to Public Meeting Presentations
- xiv From: April Telles <[afrosttelles@yahoo.com](mailto:afrosttelles@yahoo.com)> Sent: Sunday, July 28, 2019 7:11 PM To: EIR <[eir@bchd.org](mailto:eir@bchd.org)> Subject: Comments regarding the BCHD Living Campus Master Plan EIR
- xv Bruce Steele (pt. 2) Torrance, June 17, 2020 BoD Meeting
- xvi Susan Earnest 06/17/20 6:32 PM BoD Meeting
- xvii Gary Dyo Torrance 06/17/20 4:16 PM BoD Meeting
- xviii Bruce Szeles Torrance 06/17/20 7:05 PM BoD Meeting
- xix James Light Redondo Beach 06/17/20 8:14 PM BCHD BoD Meeting
- xx Redondo Beach RESOLUTION NO. CC- 1606- 052
- xxi 514 N Prospect, Max height 75-feet, Avg height under 35-feet
- xxii <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2627884/>
- xxiii <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5299389/>
- xxiv <https://books.google.com/books?hl=en&lr=&id=dEEGtAtR1NcC&oi=fnd&pg=PR5&ots=85Uef2g1gP&sig=HPoWrx5555Fr9i10Qrv8vxSHsBc#v=onepage&q&f=false>
- xxv <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4375361/>
- xxvi <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2972983/>
- xxvii <https://pubmed.ncbi.nlm.nih.gov/15677104/>
- xxviii <https://global.ctbuh.org/resources/papers/download/2100-when-buildings-attack-their-neighbors-strategies-for-protecting-against-death-rays.pdf>
- xxix <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2728098/>
- xxx <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3779905/>
- xxxi From: Lauren Berman <[laurbberman19@gmail.com](mailto:laurbberman19@gmail.com)> Sent: Wednesday, July 24, 2019 11:56 AM To: EIR <[eir@bchd.org](mailto:eir@bchd.org)> Subject: Health District Project Concerns
- xxxii Randy & Pamela Quan Torrance 06/15/20 8:55 PM June 17, 2020 BoD Mtg
- xxxiii From: Philip de Wolff <[p4ew@aol.com](mailto:p4ew@aol.com)> Sent: Sunday, July 28, 2019 11:40 AM To: EIR <[eir@bchd.org](mailto:eir@bchd.org)> Subject: BCHD Environmental Report
- xxxiv Mark Nelson [menelson@gmail.com](mailto:menelson@gmail.com) BCHD HLC CWG Member July 29, 2019 EIR NOP Comment Processor [EIR@bchd.org](mailto:EIR@bchd.org) SUBJECT: Comments on NOP and Response to Public Meeting Presentations
- xxxv From: April Telles <[afrosttelles@yahoo.com](mailto:afrosttelles@yahoo.com)> Sent: Sunday, July 28, 2019 7:11 PM To: EIR <[eir@bchd.org](mailto:eir@bchd.org)> Subject: Comments regarding the BCHD Living Campus Master Plan EIR
- xxxvi From: Wayne Craig <[wayne@waynecraighomes.com](mailto:wayne@waynecraighomes.com)> Sent: Monday, July 29, 2019 10:30 AM To: EIR <[eir@bchd.org](mailto:eir@bchd.org)> Subject: BCHD - EIR Public Comments Att Nick Meseinger
- xxxvii <https://pubmed.ncbi.nlm.nih.gov/31514400/>
- xxxviii [https://www.eurekalert.org/pub\\_releases/2020-08/b-apl081720.php](https://www.eurekalert.org/pub_releases/2020-08/b-apl081720.php)
- xxxix <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5893638/>
- xl <https://ehjournal.biomedcentral.com/articles/10.1186/s12940-019-0501-7>
- xli <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4740122/>
- xlii <https://jamanetwork.com/journals/jama/article-abstract/2667069?redirect=true>
- xliii <https://www.epa.gov/pm-pollution/health-and-environmental-effects-particulate-matter-pm>
- xliv <https://pubmed.ncbi.nlm.nih.gov/31746986/>

xlv <https://pubmed.ncbi.nlm.nih.gov/26426942/>  
 xlvi <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4515716/>  
 xlvii Dr. Frank and Glenda Briganti 19616 Tomlee Ave Torrance, CA 90503 July, 26, 2019  
 xlviii Mark Nelson [menelson@gmail.com](mailto:menelson@gmail.com) BCHD HLC CWG Member July 29, 2019 EIR NOP Comment Processor  
[EIR@bchd.org](mailto:EIR@bchd.org) SUBJECT: Comments on NOP and Response to Public Meeting Presentations  
 xlix From: Stephanie Dyo <[steph.dyo@gmail.com](mailto:steph.dyo@gmail.com)> Sent: Saturday, July 20, 2019 12:13 AM To: EIR <[eir@bchd.org](mailto:eir@bchd.org)>  
 Subject: CONCERNS to be Addressed in the EIR  
 l <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3757288/>  
 li <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6901841/>  
 lii <https://www.edweek.org/leadership/low-level-classroom-noise-distracts-experts-say/2015/01>  
 liii [https://www.researchgate.net/publication/](https://www.researchgate.net/publication/264730841)  
[264730841](https://www.researchgate.net/publication/264730841) The Effect of a Noise Reducing Test Accommodation on Elementary Students with Learning Disabilities  
 liv <http://www.edaud.org/journal/2001/4-article-01.pdf>  
 lv DEIR Figure 2-10 shows Towers Elementary and West High on Haul Route  
 lvi <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1637786/pdf/envhper00310-0128.pdf>  
 lvii <https://asa.scitation.org/doi/10.1121/1.2812596#:~:text=While%20at%20school%20children%20are,%2C%20motivation%2C%20and%20reading%20ability.>  
 lviii <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4918669/>  
 lix <https://www.bluezones.com/2019/05/how-stress-makes-us-sick-and-affects-immunity-inflammation-digestion/>  
 lx <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6460614/>  
 lxi <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6033330/>  
 lxii From: Wayne Craig <[wayne@waynecraighomes.com](mailto:wayne@waynecraighomes.com)> Sent: Monday, July 29, 2019 10:30 AM To: EIR <[eir@bchd.org](mailto:eir@bchd.org)>  
 Subject: BCHD - EIR Public Comments Att Nick Meseinger  
 lxiii Mark Nelson [menelson@gmail.com](mailto:menelson@gmail.com) BCHD HLC CWG Member July 29, 2019 EIR NOP Comment Processor  
[EIR@bchd.org](mailto:EIR@bchd.org) SUBJECT: Comments on NOP and Response to Public Meeting Presentations  
 lxiv From: peggy north <[peggy58north@gmail.com](mailto:peggy58north@gmail.com)> Sent: Sunday, July 28, 2019 11:44 AM To: EIR <[eir@bchd.org](mailto:eir@bchd.org)>  
 lxv From: Aileen Pavlin <[arpavlin@gmail.com](mailto:arpavlin@gmail.com)> Sent: Saturday, July 27, 2019 9:48 AM To: EIR <[eir@bchd.org](mailto:eir@bchd.org)> Cc: OMartinez@torranceca.gov <[OMartinez@torranceca.gov](mailto:OMartinez@torranceca.gov)> Subject: Beach Cities Health District Project

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:28 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: CPRA - Covid Vaccination Services

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

---

**From:** PRR <PRR@bchd.org>  
**Sent:** Thursday, May 6, 2021 6:51 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** FW: CPRA - Covid Vaccination Services

---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, May 6, 2021 12:37 PM  
**To:** PRR <PRR@bchd.org>  
**Subject:** Re: CPRA - Covid Vaccination Services

This CPRA is overdue and blocking intelligent participation in the CEQA process by the public.

On Thu, Apr 29, 2021 at 10:27 AM Mark Nelson (Home Gmail) <[menelson@gmail.com](mailto:menelson@gmail.com)> wrote:

Absent a reply to this CPRA request, BCHD need for future funding must be assumed to be reduced, as BCHD expenditures should be limited to the 3 beach cities that own and operate BCHD. BCHD is clearly using taxpayer-owner funds for uses outside the district and absent a valid, meaningful reply, has not made its case for the need for current or future funding.

MN60-1

This CPRA request is required for evaluation of the DEIR and intelligent public participation.

On Mon, Mar 1, 2021 at 12:17 AM Mark Nelson (Home Gmail) <[menelson@gmail.com](mailto:menelson@gmail.com)> wrote:

Provide all reimbursement agreements with non-resident cities, school districts or the County of LA to reimburse BCHD taxpayer-owners for any cost of vaccination services borne by BCHD for non-residents, including, but not limited to any non-FEMA reimbursable expenses.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:28 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: CPRA - Covid Vaccination Activity Reimbursement Agreements

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

---

**From:** PRR <PRR@bchd.org>  
**Sent:** Thursday, May 6, 2021 6:51 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** FW: CPRA - Covid Vaccination Activity Reimbursement Agreements

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, May 6, 2021 12:38 PM  
**To:** PRR <PRR@bchd.org>  
**Cc:** Martha Koo <Martha.Koo@bchd.org>; Jane Diehl <Jane.Diehl@bchd.org>; Vanessa I. Poster <Vanessa.Poster@bchd.org>; Noel Chun <Noel.Chun@bchd.org>; Michelle Bholat <Michelle.Bholat@bchd.org>  
**Subject:** Re: CPRA - Covid Vaccination Activity Reimbursement Agreements

This CPRA request is overdue and blocking the public's right to intelligent participation in the CEQA process.

On Wed, Mar 24, 2021 at 3:32 PM Mark Nelson (Home Gmail) <[menelson@gmail.com](mailto:menelson@gmail.com)> wrote:

Provide all reimbursement agreements for the costs of any BCHD-incurred covid vaccination activity at the Prospect campus associated with non-residents of the 3 beach cities that chartered South Bay Hospital District, fund BCHD, and own the underlying assets, namely, Hermosa, Manhattan and Redondo Beach.

To the extent that BCHD has failed in its fiduciary responsibility to taxpayer-owners to place reimbursement agreements in force prior to expenditures, provide the total expenditures for all vaccine related activity costs at the Prospect campus for residents and separately for non-residents of the 3 beach cities.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:28 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: The Project Description is not accurate, stable and finite

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Saturday, May 8, 2021 10:59 AM  
**To:** EIR <eir@bchd.org>  
**Subject:** The Project Description is not accurate, stable and finite

MN62-1 On June 17, 2020 the BCHD Board approved a design at a public hearing that was 75-feet tall. That is the only approved design by the public Board. The DEIR does not represent that only approved design, and is therefore not accurate or stable, and in the event of further unapproved changes, is not finite.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:30 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: CPRA - Provide diagrams absent non-existent foliage - Received

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Mark Nelson (Home Gmail) <[menelson@gmail.com](mailto:menelson@gmail.com)>  
**Sent:** Wednesday, May 5, 2021 4:48 PM  
**To:** PRR <[PRR@bchd.org](mailto:PRR@bchd.org)>; [eir@bhd.org](mailto:eir@bhd.org)  
**Subject:** CPRA - Provide diagrams absent non-existent foliage

This is both a CPRA request and an EIR Comment

The unnumbered diagram/illustration on 3.1-51 is defective and misleading. None of the foliage currently exists, or, will not be removed in construction. Therefore, absent a surety bond for replacement with mature, 30-50 foot tall foliage, the illustrations are deliberately deceptive and misleading and represent an attempt to mislead the public.

CPRA Request

***Notwithstanding BCHDs insatiable lust to demolish the 514 failed South Bay Hospital building despite the lack of requirement from any ordinance or statute; BCHDs selective “moral obligation” to “protect the community” beyond the requirements of statute or regulation that applies only to the residents, tenants and staff in the 514 failed South Bay Hospital building; BCHDs abject refusal to consider low-cost, tax-free bond financing approved by voters to make affordable the cost of its proposed RCFE and PACE operations; and BCHDs near coma-inducing sloth in replying to California Public Records Act (CPRA) requests related to its nearly \$500M proposed 103-foot tall, 800,000 sqft development and general mismanagement; I bring forward this formal public request under the CPRA:***

All diagrams in the DEIR that contain non-existent mature foliage are defective, deliberately deceptive and misleading to the public. Provide all such diagrams absent the misleading foliage.





*View of Central Driveway along North Prospect Avenue*



*View from Secondary Driveway*



DEIR Comment  
 MN63-1 (cont.) All diagrams and illustrations in the DEIR that contain non-existent mature foliage are defective, deliberately deceptive and misleading to the public. Unfortunately, they do not carry illustration numbers to reference. I have embedded an example. The DEIR is misleading and defective and must be repaired and recirculated.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:30 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: EIR Comment  
**Attachments:** Slide2.PNG; Slide1.PNG; Slide3.PNG

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Monday, May 10, 2021 12:18 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** EIR Comment

MN64-1|The following slides are a comment regarding the aesthetic damages of the DEIR proposal.

**YOU CANNOT TRUST BCHD – ITS ACTIONS DON'T MATCH ITS WORDS**

## **(1)What BCHD SAID**

BCHD told the CWG  
and Public – BCHD will use  
parking lots to buffer the  
neighborhoods

June 2017 CWG Meeting

## **(2)What BCHD DID**

Proposed a

60-foot

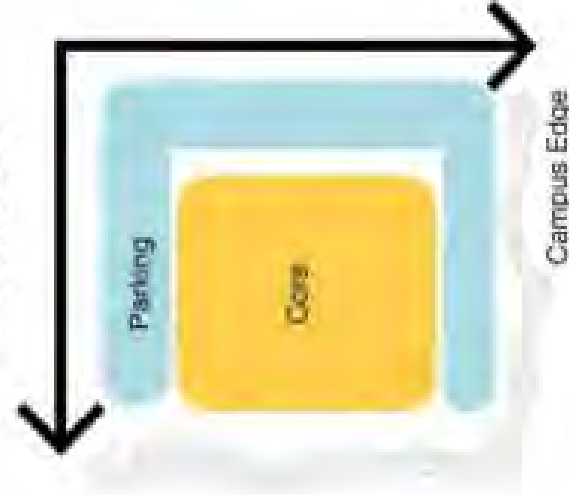
800,000 sqft Walled City up

against residential  
neighborhoods with NO  
parking buffer

January 2019 CWG Meeting

Healthy Living Campus Parking Approach

CONCEPT



**YOU CANNOT TRUST BCHD – ITS ACTIONS DON'T MATCH ITS WORDS**

### **(3)What the BCHD BOARD APPROVED**

Increased height to  
75-feet  
removed 160,000 sqft  
underground parking, replace  
parking with an 8-story, 800  
car parking ramp

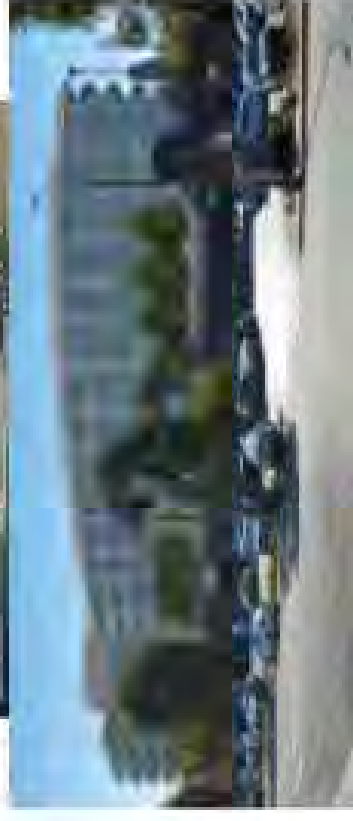
Approved at Board Meeting  
June 2020 Board Meeting



### **(4)What BCHD REALLY DID**

Increased height to  
**103-feet**  
increased parking ramp to  
10+ stories  
March 2021

March 2021 Draft Environmental Impact Report



**YOU CANNOT TRUST BCHD – ITS ACTIONS DON'T MATCH ITS WORDS**

# **BIGGER + TALLER + NO PARKING BUFFER**



**June 2019 BCHD Design**

**60-ft tall**

**729,000-sqft above ground  
160,000-sqft new underground parking**



**June 2020 BCHD Design**

**75-ft tall**

**793,000-sqft above ground  
0-sqft new underground parking**



**March 2021 BCHD Design**

**103-ft tall**

**793,000-sqft above ground  
0-sqft new underground parking**

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:31 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: DEIR Comment

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Tuesday, May 11, 2021 12:55 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** DEIR Comment

BCHDs proposed plan to place a privately developed, majority owned, and operated, market-rate, for-profit RCFE is inconsistent with land use requirements.

BCHD proposed plan is NOT consistent with the character, density or intensity of use of adjacent residential land use.

The City Council previously declared Kensington to be commercial and required full payment of commercial property taxes.

MN65-1 65852.9. The proposed facility is compatible with the density/intensity of the adjacent residential and commercial residential care for the elderly. The project site is owned by the United School District. The project applicant would enter into an agreement with the District, resulting in the operation of a private use facility. The proposed project would be a private use on a public site, subject to standard property taxes, contributing revenue to the District. The project would therefore be consistent with the General Plan p

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:32 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: DEIR Comment  
**Attachments:** Slide2.PNG; Slide3.PNG; Slide1.PNG

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Wednesday, May 12, 2021 6:25 PM  
**To:** EIR <eir@bchd.org>; Communications <Communications@bchd.org>  
**Subject:** DEIR Comment

MN66-1 | BCHD has misrepresented the project description since 2017. The attached infographics series demonstrates that the BCHD project description is inaccurate and unstable.



***YOU CANNOT TRUST BCHD – ITS ACTIONS DON'T MATCH ITS WORDS***

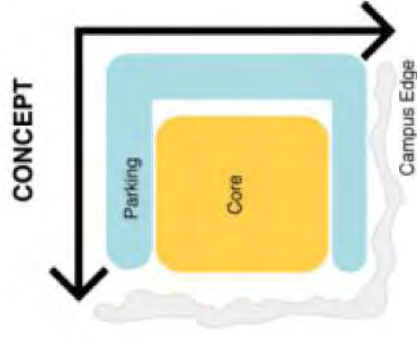
## **(1)What BCHD SAID**

BCHD told the CWG  
and Public – BCHD will use  
parking lots to buffer the  
neighborhoods  
June 2017 CWG Meeting

## **(2)What BCHD DID**

Proposed a  
60-foot  
800,000 sqft Walled City up  
against residential  
neighborhoods with NO  
parking buffer

Healthy Living Campus Parking Approach



**YOU CANNOT TRUST BCHD – ITS ACTIONS DON'T MATCH ITS WORDS**

### **(3)What the BCHD BOARD APPROVED**

Increased height to  
75-feet  
removed 160,000 sqft  
underground parking, replace  
parking with an 8-story, 800  
car parking ramp

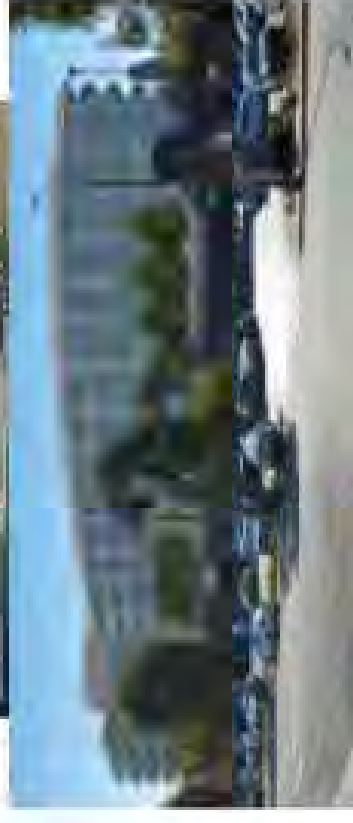
Approved at Board Meeting  
June 2020 Board Meeting



### **(4)What BCHD REALLY DID**

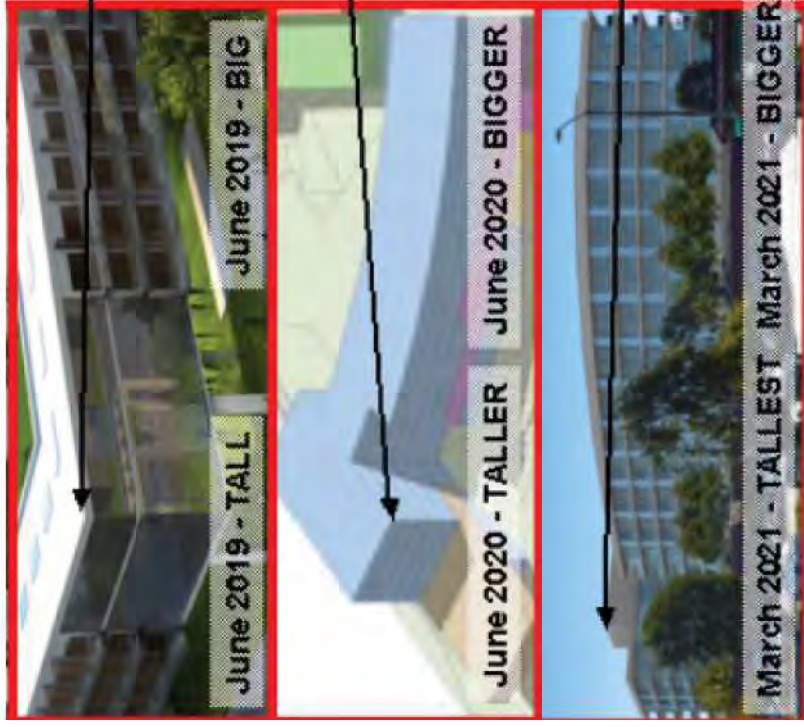
Increased height to  
**103-feet**  
increased parking ramp to  
10+ stories  
March 2021

March 2021 Draft Environmental Impact Report



***YOU CANNOT TRUST BCHD – ITS ACTIONS DON'T MATCH ITS WORDS***

## **BIGGER + TALLER + NO PARKING BUFFER**



### **June 2019 BCHD Design**

60-ft tall

729,000-sqft above ground

160,000-sqft new underground parking

### **June 2020 BCHD Design**

75-ft tall

793,000-sqft above ground

0-sqft new underground parking

### **March 2021 BCHD Design**

103-ft tall

793,000-sqft above ground

0-sqft new underground parking

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:32 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: The DEIR failed to analyze the impacts of the 4kV substation

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Wednesday, May 12, 2021 8:31 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** The DEIR failed to analyze the impacts of the 4kV substation

BCHD is electively moving the electric service entrance from the internals of the campus to the adjoining residential neighborhood on Diamond. It will be a hazard to both neighbors who will have long term EMF contact and to traffic, where a vehicle could impact the facility. While BCHD DEIR is deficient in its 4kV discussion, I presume it is a 16kV to 4kV or 12kV to 4kV step down, that needs accompanying further step down. Again, the mere fact that this is unclear, demonstrates that the DEIR is defective, must be remedied and recirculated.

MN67-1

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:32 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: CPRA Request and DEIR Comment - qualifications of Wood PLC

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Wednesday, May 12, 2021 8:47 PM  
**To:** EIR <eir@bchd.org>; PRR <PRR@bchd.org>  
**Subject:** CPRA Request and DEIR Comment - qualifications of Wood PLC

Given that BCHD board member Vanessa Poser brought up Wood PLCs qualifications and credibility, the following comments and questions represent deficiencies in the DEIR and are also CPRA requests that go to the qualifications of Wood to conduct a CEQA and protect surrounding neighborhoods. As this was initiated by a BCHD Board member, it is relevant and required to provide impeachment of her softball questions.

1) Provide full documentation of the allegations, settlement and any unsettled issues from the Wood PLC bribery scandal referred to in the following articles:

<https://www.complianceweek.com/anti-bribery/john-wood-group-reserves-46m-to-resolve-bribery-investigations/28598.article>

<https://www.complianceweek.com/anti-bribery/john-wood-group-earmarks-197m-for-global-bribery-settlement/30168.article>

<https://www.wsj.com/articles/john-wood-to-pay-9-million-to-settle-with-scottish-prosecutors-11616004425>

<https://www.ft.com/content/93b02040-4419-4808-ae21-8905c0c9c342> (151m)

<https://www.energyvoice.com/oilandgas/307447/wood-bribery-investigation-settlements/> (196m)

MN68-1

2) Provide updated documents on the status of Wood PLCs partnership with Meridian in refining adjacent to the Roosevelt National Park per these articles:

<https://www.bicmagazine.com/resources/supplier-news/meridian-energy-group-inc-selects-wood-as-its-operations-rea/>

<https://www.globenewswire.com/en/news-release/2020/04/16/2017356/0/en/Meridian-Energy-Group-Inc-Selects-Wood-as-its-Operations-Readiness-and-Assurance-Partner-for-the-Davis-Refinery.html>

3) Provide updated documents on the operations of Wood in the Canadian tar sands, as per:

<https://www.woodplc.com/news/latest-news-articles/2019/wood-expands-office-in-edmonton,-alberta>.

<https://www.woodplc.com/investors?a=2661>

4) Provide updated documents as to Wood PLCs status on the Wreckers of the Earth list:

<https://corporatewatch.org/wreckers-of-the-earth-london-company-directory/>

5) Provide records demonstrating Wood PLCs "feet on the street" dates and times of physical review of the site and surrounding neighborhoods, along with contemporaneous notes from such field visits.



## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:32 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: DEIR Comments

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Friday, May 14, 2021 2:34 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** DEIR Comments

### **WHY BCHD PROPOSED OVER-DEVELOPMENT MUST BE REJECTED: Too Big, Too Tall, Too Loud, Too Damaging, Too Expensive**

#### **BCHD 2021 PROJECT IS BOTH TALLER AND BIGGER THAN THE 2019 PROJECT**

Over 1,200 neighboring residents signed a petition against the BCHD proposed project. BCHD then chose to make it taller (103-feet instead of 60-feet) and bigger (793,000 sqft aboveground instead of 729,000 sqft by moving underground parking to a 10-1/2 story parking ramp at Prospect and Diamond.

#### **BCHD PROJECT IS TOO TALL FOR NEIGHBORHOOD CHARACTER**

At 133-1/2 feet above street level, the massive complex blocks views of the Palos Verdes hillside, blocks the blue sky view for neighbors, shades/shadows a broad area from Towers Elementary throughout west Torrance and Redondo Beach, invades privacy in homes and yards for a one-half mile radius, and is incompatible with surrounding 30-foot tall or less residential uses. The 2021 proposed design is 43-feet TALLER than the 2019 design that garnered over 1,200 petitions to reduce its size. BCHD claims there's no significant impact on the neighbors except for the PV view, as BCHD considers their 103-foot project to be consistent with the residential, 30-foot limited surrounding residential character. BCHD apparently believes their project is also consistent with the Beryl Heights design guidelines.

#### **BCHD PROJECT IS TOO BIG FOR NEIGHBORHOOD CHARACTER**

At 792,000 sqft, the complex is 150+% the size of CenterCal's 525,000 sqft Mall-by-the-Sea and 2-1/2 times the size of the current buildings. BCHD is proposing a development that is roughly the size of South Bay Galleria or Staples Center. The 2021 proposed design has over 60,000 sqft more aboveground buildings than the 2019 design, as BCHD moved 160,000 sqft of underground parking into a massive 10-1/2 story ramp at Prospect & Diamond. BCHD claims there's no significant impact on the neighbors or on traffic, as traffic will undoubtedly back up for blocks on Prospect.

#### **BCHD WILL SUBJECT CHILDREN AND ELDERLY TO DEADLY TAILPIPE EMISSIONS**

Thousands of trucks across 5-years or more will past West High and Towers Elementary spewing emissions and debris that can include asbestos, asthma-causing micro-particulates, and dirt/dust into our children's developing lungs. Traffic will also be delayed on Beryl St. BCHD claims there's no significant impact on the children because they'll use flaggers to stop traffic.

#### **BCHD CONSTRUCTION TRAFFIC WILL DISRUPT LOCAL SCHOOLS AND RESIDENTS**

Thousands of full and empty rattling, diesel construction heavy trucks will roll past West High, down Prospect and then past Towers Elementary for at least 5-years disrupting schools and homes. Students at Towers will

MN69-5 (cont.) have intermittent 85db noise throughout the day in their classrooms disrupting their development and learning. BCHD claims there's no significant impact on the children.

### **BCHD IS BUILDING FOR 80% NON-RESIDENTS OF THE 3 BEACH CITIES**

MN69-6 Hermosa, Redondo, and Manhattan Beach fund and own BCHD for the benefit of our 3 cities. BCHD consultant, MDS, found that less than 5% of BCHDs tenants will be from 90277 (south Redondo) that houses the facility. Only 8% will be from Redondo Beach that has to issue the Conditional Use Permit. And less than 20% will be from all 3 beach cities. The facility is being developed for outsiders while all the environmental damages will surround the publicly owned campus. Since 80% of tenants aren't from the 3 beach cities, this facility doesn't even need to be in the beach cities.

### **BCHD CONSTRUCTION AND OPERATIONS HEAVILY IMPACT WEST TORRANCE**

MN69-7 BCHD is chartered and funded to serve the residents of Hermosa, Manhattan and Redondo Beach. Torrance residents will suffer 5+ years of construction noise, traffic, toxic emissions, blowing particulate matter, and other significant negative impacts, despite BCHD claiming only noise is significant. Then Torrance residents will suffer 50-100 years of noise, traffic, shading, glare, bright outside lighting, lights and sirens, and other damages – just like they've suffered 60+ years of negative impacts from South Bay Hospital and BCHD to date.

### **BCHD CONSTRUCTION NOISE WILL DISRUPT LOCAL SCHOOLS AND RESIDENTS**

MN69-8 Demolition of about 200,000 sqft of concrete buildings, loading and hauling debris, pounding steel shoring, and other construction, especially at 133-1/2 feet above street level for 5-years or more will disrupt the surrounding neighborhoods including schools, homes and businesses. BCHD claims there's no significant impact on the children.

### **BCHD LIVE EVENTS WILL DISRUPT LOCAL RESIDENTS UNTIL 10PM**

MN69-9 BCHD describes planned loud events on the openspace, such as amplified music, classes, and gatherings of 100s of people operating until 10PM. The sound will be channeled into west Torrance by the tall buildings on the North, West and South edges of campus, built up against residential neighborhoods. BCHD claims there's no significant impact on the surrounding neighbors.

### **BCHDs PROJECT IS DELIBERATELY UNAFFORDABLE**

MN69-10 BCHD plans a fully commercial developer built and operated, market-priced assisted living facility with \$12,000+ per month rents occupying our publicly-owned land. The facility is financially out of the reach of most surrounding neighbors that have already suffered through the past 60-years of the hospital and BCHDs noise, traffic, emissions, and construction. Facilities by publicly-owned agencies built on publicly-owned land should be non-profit, built with tax-free public financing, and affordable to the neighborhoods that suffer the environmental and economic injustice impacts. BCHD MUST ONLY CHOOSE THE PUBLIC OPTION WITH TAX-FREE PUBLIC BONDS AND NON-PROFIT OPERATION.

### **BCHDs PLAN IS INCOMPATIBLE WITH ISSUANCE OF A CONDITIONAL USE PERMIT**

MN69-11 Redondo Beach's CUP rules require that the project has no negative impacts on the surrounding uses. The surrounding residential uses are 100-feet or more lower than the proposed project and will suffer from noise, traffic, emissions, excessive nighttime security lighting, sirens, and other negative impacts. The design is not even remotely compatible with neighborhood design standards or uses. At 792,000 sqft, the complex will be larger than the sqft of all the homes in the entire Beryl Heights neighborhood.

### **BCHD BOARD DIRECTED STAFF TO AVOID A PUBLIC VOTE**

MN69-12 CEO Bakaly has repeatedly stated that the Board directed him to avoid a public vote and instead find a commercial developer to build on the site in return for a long term lease. BCHD seems to forget that taxpayers chartered, own, fund, and allow operation of BCHD. BCHD also forgets that taxpayers can issue 2% tax-free debt and build affordable senior housing.



## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:57 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD Over-development Comments

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Saturday, May 15, 2021 6:20 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Fwd: BCHD Over-development Comments

Public DEIR comment

----- Forwarded message -----

**From:** Mark Nelson (Home Gmail) <[menelson@gmail.com](mailto:menelson@gmail.com)>  
**Date:** Sat, Dec 5, 2020 at 6:22 PM  
**Subject:** BCHD Over-development Comments  
**To:** <[Al.Muratsuchi@asm.ca.gov](mailto:Al.Muratsuchi@asm.ca.gov)>

Dear Assemblyman Maratsuchi:

I have been a volunteer for nearly 4 years at BCHD in their 793,000 sqft development project. That is roughly the size of the South Bay Galleria. The project began in 2009 in the center of the campus and not until 2019, did BCHD propose building on the perimeter of the campus, thereby maximizing the visual mass of the project and minimizing the remaining privacy of surrounding neighborhoods. South Bay Hospital failed in 1984 as a public hospital and again in the mid 1990s as a private hospital. While South Bay Hospital clearly and negatively impacted the surrounding neighborhoods with economic and environmental injustice, at least it provided a close source of emergency care. BCHD provides no such function, and its continued economic and environmental damages are unwanted by the surrounding communities. Below are my comments to the local governments, media and BCHD on this oversized development.

----- Forwarded message -----

**From:** Mark Nelson (Home Gmail) <[menelson@gmail.com](mailto:menelson@gmail.com)>  
**Date:** Sat, Dec 5, 2020 at 2:54 PM  
**Subject:** Community Working Group Comments 12-7-2020 (1st Edition, 12/5/2020)  
**To:** Communications <[communications@bchd.org](mailto:communications@bchd.org)>  
**Cc:** Judy Rae <[easyreader@easyreadernews.com](mailto:easyreader@easyreadernews.com)>, Lisa Jacobs <[lisa.jacobs@tbrnews.com](mailto:lisa.jacobs@tbrnews.com)>, <[cityclerk@redondo.org](mailto:cityclerk@redondo.org)>, <[CityClerk@torranceca.gov](mailto:CityClerk@torranceca.gov)>, Steven Keller <[skeller@rbusd.org](mailto:skeller@rbusd.org)>, Tim Stowe <[stowe.tim@tusd.org](mailto:stowe.tim@tusd.org)>

Public Comments to BCHD, CWG, City of Torrance, City of Redondo Beach, TUSD, RBusD and Media

MN70-2 Due to a medical conflict, I am unable to attend the December 7, 2020 BCHD Community Working Group meeting.

MN70-2  
(cont.)

These comments for the December 7, 2020 CWG meeting are with respect to the BCHD never before seen design that was released at 605PM on June 12, 2020 and board-approved on June 17, 2020 after only 3 business days of public review, analysis and input despite the project having an 11-year history and no public meetings, Zoom or otherwise, for months and months. The plan moved 160,000 sq ft of parking to the upper 4 stories of an 8-story parking structure at Prospect and Diamond, placed a 75-foot tall, 6-story, "upscale" \$12,000 monthly senior apartment building on the north lot line from the 520 building to Flagler, added a never before seen aquatic center, and lined Prospect from Diamond to the north entrance with buildings. This never before seen design with significantly different features and environmental damages than that disclosed in the NOP was only allowed 3 business days for the public before approval by the Board.

1. BCHD is proposing to do significant environmental damage to the surrounding neighborhoods by its voluntary early retirement, demolition, and rebuilding of the 514 building.

2. The City of Redondo, County of Los Angeles, and the State of California have no ordinances that require demolition or seismic retrofit of the 514 for non-hospital use. The environmental damage, landfilling of debris, and rebuilding of the 514 building is an exclusively discretionary, non-required act by BCHD.

MN70-3

3. Youssef Associates clearly states that retrofit or demolition is a voluntary act by BCHD. Further, Youssef also states that under the best practices ordinance of the City of LA (not applicable) the 514 would have approximately 20 years of existing life prior to retrofit or demolition. Absent BCHD internal decision that retrofit is required, Youssef would have no opinion.

4. BCHD and BCHD alone determined that 514 must be retrofitted or demolished. There is no Youssef determination in any Youssef reports.

5. BCHD has no professional opinion that 514 is unsafe for continued use and must be effectively "red tagged."

6. BCHD has conducted no Economic Justice analysis of its damages on the surrounding neighborhoods.

MN70-4

7. BCHD has conducted no Environmental Justice analysis of its damages on the surrounding neighborhoods.

8. BCHD has less than 1000 sqft of the campus at the building height of 75 feet (the penthouse), that highest point is nearly dead-center in the campus lot, and BCHD is using that 0.3% of the campus sqft to establish the proposed height to be built on the perimeter.

MN70-5

9. 75-foot tall perimeter construction is the equivalent of 300-foot tall construction at the campus center.

10. BCHD is weaponizing economic and environmental injustice by proposing the 75 foot, 6-story, "upscale" senior apartments on the far north side of the campus against residential neighborhoods made up of young, economically disadvantaged renters with a larger minority fraction than the other "beach cities" that own and fund BCHD. These renters do not have the economic means to effectively oppose BCHD and that's likely why they were selected as powerless opponents to BCHD.

MN70-6

11. BCHD is proposing environmentally damaging noise, light, and particulate pollution of the surrounding neighborhoods at Prospect and Diamond with its 8-story, 800+ car parking structure.

MN70-7

MN70-8 12. When counting relevant, above ground development, BCHD June 17, 2020 Board approved design is more sqft than prior designs as BCHD moved 160,000 sqft of parking structure from underground to above ground atop the 8-story structure.

MN70-9 13, BCHD, RBUSD and TUSD are all aware that PM 2.5 pollution from construction and traffic lodges in the brainstems of children, causing Alzheimer's like conditions and delayed development, yet BCHD continues to propose to add to the PM 2.5 burden of Towers and Beryl Heights schools.  
<https://pubmed.ncbi.nlm.nih.gov/27567860/>  
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6138768/>

MN70-10 14. 95% of the housing BCHD has proposed serves persons outside of Redondo Beach 90277 according to MDS's study.

MN70-10 15. 80% of the housing BCHD has proposed serves non-residents of the 3 beach cities.

MN70-10 16. 100% of the Economic and Environmental Injustice burden of the proposed project to the 3 beach cities occurs in Redondo Beach 90277.

MN70-11 17. The South Bay Hospital was approved and funded by voters. After its failure in 1984 as a public hospital and subsequent failure in the mid-1990s as a leased facility (cite: Daily Breeze) it retained all voter approved assets and changed its name to BCHD.

MN70-11 18. South Bay Hospital provided a quid pro quo for its economic and environmental damages to the surrounding neighborhoods of an emergency hospital, as approved by voters. BCHD has no such approval nor emergency benefits to the surrounding neighborhoods. BCHDs location is not required to be at the Prospect campus.

MN70-12 19. There is a 1200 signature petition opposing BCHD development.

MN70-13 20. BCHD Board Member Vanessa I. Poster, caregiver to her 93 year old father, was unable to keep Covid out of her personal household. There will be over 700 tenants and PACE patients in the proposed BCHD facility and the demonstrated ineptitude of one Board member sends a clear signal of the ineptitude of the organization.

MN70-14 21. BCHD's so-called environmental firm, Wood PLC, earns the vast majority of its income supporting oil and chemicals business, including but not limited to the tar sands, fracking, and refining. Wood PLC is an immoral and unfit choice for environmental protection and CEQA execution.

MN70-14 TAR SANDS  
<https://www.woodplc.com/news/2019/wood-opens-new-office-in-edmonton,-alberta>  
FRACKING  
<https://meridianenergygroupinc.com/wood-selected-by-meridian-energy-group-inc-to-partner-for-the-davis-refinery/>  
REFINING  
<https://minnesota.cbslocal.com/2020/01/10/planned-n-d-refinery-by-theodore-roosevelt-national-park-hurt-by-funding-lawsuits/>

Mark Nelson  
3+ Year Volunteer to BCHD CWG  
Redondo Beach Property Owner  
Expert Witness  
Member Sierra Club, NRDC, EDF, Nature Conservancy

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:57 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Comment - Negative Impacts on Towers Elementary Students

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Saturday, May 15, 2021 6:22 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Public Comment - Negative Impacts on Towers Elementary Students

BCHD has failed to appropriately analyze the intermittent impacts of its proposed heavy haul route on health, learning, and cognition of elementary students. The peer-reviewed study below is clear evidence of the the defectiveness of BCHD analysis and its significant damages on Torrance Towers students.

MN71-1 The present paper provides an overview of research concerning both acute and chronic effects of exposure to noise on children's cognitive performance. Experimental studies addressing the impact of acute exposure showed negative effects on speech perception and listening comprehension. These effects are more pronounced in children as compared to adults. Children with language or attention disorders and second-language learners are still more impaired than age-matched controls. Noise-induced disruption was also found for non-auditory tasks, i.e., serial recall of visually presented lists and reading. The impact of chronic exposure to noise was examined in quasi-experimental studies. Indoor noise and reverberation in classroom settings were found to be associated with poorer performance of the children in verbal tasks. Regarding chronic exposure to aircraft noise, studies consistently found that high exposure is associated with lower reading performance. Even though the reported effects are usually small in magnitude, and confounding variables were not always sufficiently controlled, policy makers responsible for noise abatement should be aware of the potential impact of environmental noise on children's development.

Keywords: noise, cognitive performance, cognitive development, children, speech perception, listening comprehension, irrelevant sound effect, classroom acoustics

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3757288/>

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:59 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: As a DEIR comment, I will be filing a full list of un-answered PRRs from BCHD that prevented intelligent participation of our 1,200 petition signers

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Saturday, May 15, 2021 5:49 PM  
**To:** PRR <PRR@bchd.org>  
**Subject:** As a DEIR comment, I will be filing a full list of un-answered PRRs from BCHD that prevented intelligent participation of our 1,200 petition signers

MN72-1

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:57 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: DEIR Comment - Noise from Parking Ramp - Significant Negative Impact on Surrounding Uses

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Sunday, May 16, 2021 3:46 PM  
**To:** EIR <eir@bchd.org>; Communications <Communications@bchd.org>; Geoff Gilbert <geoffgilbert2248@aol.com>; Rosann Taylor <rosanntaylor@mac.com>  
**Subject:** DEIR Comment - Noise from Parking Ramp - Significant Negative Impact on Surrounding Uses

**BCHD distinctly errs when it averages the loud, intermittent noises from the 10-1/2 story parking ramp in order to "average them away."**

The parking spaces in the 10+ story parking ramp would generate 24/7 visitor and employee traffic and associated intermittent noise, including but not limited to, vehicle movements, engine noise, car horns, slamming of car doors, tire squeals, brake squeals, doors opening and closing, car alarms, car lock and unlock beeping sounds, and people talking. As a result, the use of averages is an error. At any time of the day or night, the surrounding neighborhoods will be subject to intermittent noise that will disturb homeschooling, concentration, sleep, and quiet enjoyment of residential uses.

**CEO Bakaly has set the BCHD "Moral Obligation" standard for use in the CEQA process by applying it to the seismic condition of 514 N Prospect that has no laws or ordinances requiring action.**

MN73-1 Under the Bakaly BCHD Moral Obligation standard, that must be applied to all CEQA impacts in lieu of codes, rules and ordinances, BCHD has a moral obligation to proactively protect community health. As such BCHD must recognize that intermittent noise, not just average noise such as 60-minute Leq, is a driver of stress, cardiovascular risk, classroom impairment, and general negative health impacts. BCHD is, after all, a self-declared leading health agency and one of roughly 1,200 paid members and "winners" of so-called "awards" that are better characterized as membership benefits. BCHDs intermittent noise will impact school children at Towers Elementary with greater impact on those with physical and learning disabilities, and second-language learners that tend to be economically and socially disadvantaged. This is a clear violation of ADA and an EJ impact.

The following peer-reviewed studies clearly establish the negative impacts of intermittent noise - noise that BCHD has "averaged away". For instance, can an otherwise quiet environment tolerate a gunshot each hour with trivial increases in overall noise energy? The answer is, "on average" yes. However the impact on health of the random intermittent noise is negative and significant.

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5898791/>

**Title: The Adverse Effects of Environmental Noise Exposure on Oxidative Stress and Cardiovascular Risk**

Experimental studies have shown that noise may lead to release of stress hormones [for review, see Noise in Europe 2014 (14)]. This was observed in studies on aircraft noise (148, 149) and road traffic noise exposure (113, 115). Interestingly, music has also been shown to increase catecholamine and cortisol levels (30). In addition, intermittent noise caused stronger effects on norepinephrine and corticosteroid levels than steady noise (275, 276)

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2996188/>

**Title: Noise and Quality of Life**

The psychological effects of noise are usually not well characterized and often ignored. However, their effect can be equally devastating and may include hypertension, tachycardia, increased cortisol release and increased physiologic stress. Collectively, these effects can have severe adverse consequences on daily living and globally on economic production.

MN73-1  
(cont.)

<https://pubmed.ncbi.nlm.nih.gov/23567534/>

**Title: The effect of noise on human performance: a clinical trial**

Intermittent noise, especially at high pressure levels, was responsible for worsening environmental conditions during performing a task.

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3757288/>

**Title: Does noise affect learning? A short review on noise effects on cognitive performance in children**

Experimental studies addressing the impact of acute exposure showed negative effects on speech perception and listening comprehension. These effects are more pronounced in children as compared to adults. Children with language or attention disorders and second-language learners are still more impaired than age-matched controls



## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:58 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD DEIR COMMENTS - Defective DEIR needs to be corrected and recirculated - fails to recognize intermittent noise impacts

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---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Sunday, May 16, 2021 6:05 PM  
**To:** EIR <eir@bchd.org>; Communications <Communications@bchd.org>; torranceptas@gmail.com <torranceptas@gmail.com>; rbpta@rbusd.org <rbpta@rbusd.org>; Steven Keller <skeller@rbusd.org>; Tim Stowe <stowe.tim@tusd.org>  
**Cc:** Martha Koo <Martha.Koo@bchd.org>; Jane Diehl <Jane.Diehl@bchd.org>; Noel Chun <Noel.Chun@bchd.org>; Michelle Bholat <Michelle.Bholat@bchd.org>  
**Subject:** BCHD DEIR COMMENTS - Defective DEIR needs to be corrected and recirculated - fails to recognize intermittent noise impacts

BCHD planned haul routes for up to 5 years are a health hazard to students, teachers, residents, and the general public via high levels of intermittent noise with negative cardiovascular, cognitive, and other community health hazards.

BCHD distinctly errs when it averages the loud, intermittent noises from the 1000s of heavy haul trucks that will pass by Torrance West High, Torrance Towers Elementary, and backup traffic onto Beryl past Redondo Beach Beryl Height Elementary in order to "average away" the well understood noise and vibration of large numbers of large trucks across 5 years of construction.

The trucks will be both empty and loaded, causing different loading and noise profiles. Loaded trucks will lug and have lower spectrum noise during acceleration and engine braking on the downhill, such as approaching Towers. Empty trucks will rattle and shake, letting off higher spectrum noise. Both will cause vibration. The surrounding neighborhoods will be subject to intermittent noise that will disturb especially Towers PK-5 as well as homeschooling, concentration, sleep, and quiet enjoyment of residential uses.

CEO Bakaly has set the BCHD "Moral Obligation" standard for use in the CEQA process by applying it to the seismic condition of 514 N Prospect that has no laws or ordinances requiring action.

Under the Bakaly BCHD Moral Obligation standard, that must be applied to all CEQA impacts in lieu of codes, rules and ordinances, BCHD has a moral obligation to proactively protect community health. As such BCHD must recognize that intermittent noise, not just average noise such as 60-minute Leq, is a driver of stress, cardiovascular risk, classroom impairment, and general negative health impacts. BCHD is, after all, a self-declared leading health agency and one of roughly 1,200 paid members and "winners" of so-called "awards" that are better characterized as membership benefits. BCHDs intermittent noise will impact school children at Towers Elementary with greater impact on those with physical and learning disabilities, and second-language learners that tend to be economically and socially disadvantaged. This is a clear violation of ADA and an EJ impact.

The following peer-reviewed studies clearly establish the negative impacts of intermittent noise - noise that BCHD has "averaged away". For instance, can an otherwise quiet environment tolerate a gunshot each hour with trivial increases in overall noise energy? The answer is, "on average" yes. However the impact on health of the random intermittent

noise is negative and significant.

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5898791/>

**Title: The Adverse Effects of Environmental Noise Exposure on Oxidative Stress and Cardiovascular Risk**

Experimental studies have shown that noise may lead to release of stress hormones [for review, see Noise in Europe 2014 (14)]. This was observed in studies on aircraft noise (148, 149) and road traffic noise exposure (113, 115).

Interestingly, music has also been shown to increase catecholamine and cortisol levels (30). In addition, intermittent noise caused stronger effects on norepinephrine and corticosteroid levels than steady noise (275, 276)

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2996188/>

**Title: Noise and Quality of Life**

The psychological effects of noise are usually not well characterized and often ignored. However, their effect can be equally devastating and may include hypertension, tachycardia, increased cortisol release and increased physiologic stress. Collectively, these effects can have severe adverse consequences on daily living and globally on economic production.

MN74-1  
(cont.)

<https://pubmed.ncbi.nlm.nih.gov/23567534/>

**Title: The effect of noise on human performance: a clinical trial**

Intermittent noise, especially at high pressure levels, was responsible for worsening environmental conditions during performing a task.

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3757288/>

**Title: Does noise affect learning? A short review on noise effects on cognitive performance in children**

Experimental studies addressing the impact of acute exposure showed negative effects on speech perception and listening comprehension. These effects are more pronounced in children as compared to adults. Children with language or attention disorders and second-language learners are still more impaired than age-matched controls

These represent 4 articles of dozens or perhaps 100s that can be provided to demonstrate the known and peer reviewed harm of intermittent noise. As you and your consultants are well aware, Leq average noise is appropriate for physical hearing protection, not cardiovascular, cognitive, quiet enjoyment or other health impacts.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:59 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Comment - BCHD violates Environmental Justice and Failed to Consider EJ in the DEIR

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Sunday, May 16, 2021 11:17 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Comment - BCHD violates Environmental Justice and Failed to Consider EJ in the DEIR

According to the California Attorney General's (AG) Office memo, the following are a subset of CEQA's Purposes and the AG relates them to Environmental Justice (EJ):

The importance of a healthy environment for all of California's residents is reflected in CEQA's purposes. In passing CEQA, the Legislature determined:

1) "The maintenance of a quality environment for the people of this state now and in the future is a matter of statewide concern." (Pub. Res. Code, § 21000, subd. (a).)

MN75-1 2) "[M]ajor consideration [must be] given to preventing environmental damage, while providing a decent home and satisfying living environment for every Californian." (Id. at subd. (g).)

3) We must "[t]ake all action necessary to provide the people of this state with clean air and water, enjoyment of aesthetic, natural, scenic, and historic environmental qualities, and freedom from excessive noise." (Pub. Res. Code, § 21001, subd. (b).)

It is clear that BCHD fails these and other EJ metrics.

MN75-2 1. BCHD haul routes cause health and learning impacts to Torrance students via noise, with special impacts on ESL learners per peer-reviewed research that tend to be in EJ groups.

2. BCHD haul routes cause health impacts to Torrance students via emissions that peer-reviewed research shows have lifelong impacts on children.

MN75-3 3. BCHD and SBHD have thrust EJ impacts on the surrounding neighborhoods for over 60 years. It is a de facto EJ violation of 2 and 3 above.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:00 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: For the legal record - BCHD is deficient in CPRA responses

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---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Monday, May 17, 2021 1:06 PM  
**To:** Communications <Communications@bchd.org>; EIR <eir@bchd.org>  
**Cc:** Paul Novak <pnovak@lalafco.org>; Eleanor Manzano <cityclerk@redondo.org>  
**Subject:** For the legal record - BCHD is deficient in CPRA responses

BCHD, and only BCHD, actively chose to proceed with its RCFE and campus commercial development during Covid. BCHD was fully aware at the time it approved its development at the June 2020 Board meeting, after allowing only 3 business days of public review, analysis and comment, that Covid was raging, the public needed it full attention and immunity to battle the virus, and that BCHD fully intended to usurp the funding and responsibilities of LA County Health regarding Covid testing. BCHD tested 85% non-residents according to CPRA responses with resident taxpayer funding. .

BCHD is attempting to hide behind Covid to avoid responding timely to CPRA requests, however, BCHD, and only BCHD, elected to proceed with a nearly one-half billion dollar development process after Covid was well understood and the BCHD response was planned. As such, BCHD must fulfill all outstanding CPRA requests prior to June 1, 2021 to allow for time to incorporate them into the DEIR record, or, BCHD must delay the closing of the DEIR record until such time as it has made responses to all outstanding CPRA requests.

BCHD cannot hide behind Covid, since BCHD was the sole architect of the timing of its development activities, executing them concurrently with Covid by design.

This serves as legal notice.

Mark Nelson  
3+ Year BCHD Volunteer, CWG  
Redondo Beach

cc: LALAFCO, Redondo Beach City Council Public Comment

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:00 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: DEIR Comment - BCHD DEIR Fails to Adequately Consider the Many Negative Impacts of Chronic Stress

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Monday, May 17, 2021 1:31 PM  
**To:** Communications <Communications@bchd.org>; EIR <eir@bchd.org>  
**Cc:** Eleanor Manzano <cityclerk@redondo.org>; Paul Novak <pnovak@lalafco.org>  
**Subject:** DEIR Comment - BCHD DEIR Fails to Adequately Consider the Many Negative Impacts of Chronic Stress

BCHD thoroughly disregarded the negative health impacts of its proposed development, in both short term and long term time frames, to the surrounding community in its Draft EIR. As such, the draft EIR is defective, must be corrected, and must be recirculated for public comment.

### BCHD IGNORES THE BAKALY MORAL OBLIGATION STANDARD TO THE PUBLIC IN ITS DEVELOPMENT AND DEIR

To facilitate BCHD Board's desired demolition of the 514 N Prospect Bldg., CEO Bakaly established the Bakaly Moral Obligation Standard to the community. In brief, that standard allows BCHD to ignore the lack of any laws or ordinances allowing continued use of the 514 Building, and instead, relying on a BCHD moral obligation to proactively protect the community from damage. BCHD is actively ignoring the Bakaly Standard with respect to the damages it plans to continue inflicting on surrounding neighborhoods.

### BCHD IGNORES ITS BLUE ZONES PROGRAM

MN77-1 As a purchaser of the Blue Zones program for approximately \$2M, BCHD is ignoring its vendor that has gone on the record that chronic stress is the "silent killer" via a number of mechanisms including reducing immunity. This is particularly troubling as BCHD elected to proceed with commercial development placing the surrounding community into extreme stress during Covid.

<https://www.bluezones.com/2019/05/how-stress-makes-us-sick-and-affects-immunity-inflammation-digestion/>

### **How Stress Makes Us Sick and Affects Immunity, Inflammation, Digestion**

### BCHD IGNORES PEER-REVIEWED STUDIES LINKING STRESS TO DISEASE, IN ADDITION TO IGNORING BLUE ZONES

Some examples include, but are not limited to:

Child Development

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4928741/>

### **Toxic Stress: Effects, Prevention and Treatment**

Child Mental Health

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5841253/>

### **Chronic Stress in Adolescents and Its Neurobiological and Psychopathological Consequences: An RDoC Perspective**

Cancer Development

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7466429/>

## **Chronic Stress Promotes Cancer Development**

Cardiovascular Damage

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2633295/>

## **Psychological Stress and Cardiovascular Disease**

Inflammation

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5476783/>

## **Inflammation: The Common Pathway of Stress-Related Diseases**

Pulmonary

<https://pubmed.ncbi.nlm.nih.gov/29156451/>

## **Impact of Stressful Life Events on Patients with Chronic Obstructive Pulmonary Disease**

## **CONCLUSION**

The BCHD DEIR is defective. In addition, BCHD is acting inconsistently with the Bakaly Standard that it established, and against the best health interests of the surrounding community. This is wholly inconsistent with the State of California enabling legislation and the purpose of Health Districts.

Mark Nelson

3+ Year BCHD Volunteer, CWG

Redondo Beach

cc: LALAFCO, Redondo Mayor and Council as public comments

bcc: various

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:00 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: DEIR Comment - Noise and Cardiovascular Impacts - Peer Reviewed Study

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---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Monday, May 17, 2021 9:07 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** DEIR Comment - Noise and Cardiovascular Impacts - Peer Reviewed Study

The following study includes construction noise and traffic noise and its causal relationship to atrial fibrillation (afib). BCHD DEIR errs in that it only considers hearing loss impacts from noise, and not afib or the many other severe negative health impacts from noise.

<https://pubmed.ncbi.nlm.nih.gov/29695315/>

**Annoyance to different noise sources is associated with atrial fibrillation in the Gutenberg Health Study**

MN78-1 Annoyance from road traffic, aircraft, railways, industrial/construction and neighbourhood noise during daytime and sleep were collected ... neighbourhood noise annoyance during daytime (OR 1.14; 95% CI 1.09-1.20) and during sleep (OR 1.14; 95% CI 1.07-1.21), industrial noise annoyance during daytime (OR 1.11; 95% CI 1.04-1.18). Different degrees of annoyance were not associated with changes in cardiovascular risk factors.

As a health district with the Bakaly Standard of moral obligation to protect the community, BCHD must mitigate its impacts on afib and other severe health damages from BCHDs planned construction and 50-100 years of operation.



## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:00 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD failed to evaluate the lifetime health damage of 5 years of construction on developing children

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---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Monday, May 17, 2021 9:16 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** BCHD failed to evaluate the lifetime health damage of 5 years of construction on developing children

According to Harvard researchers, children undergoing stress can develop "toxic stress, leading to damaged, weakened bodily systems and brain architecture, with lifelong repercussions"

BCHD noise, vibration, traffic, and construction will impart stress on the surrounding community, leading to the potential for toxic stress. As such, BCHD must declare, study, and mitigate the stressors that its project will undeniably create.

As a health district with the Bakaly Standard of a moral obligation to prevent health damages to the community, BCHD is obligated to fully mitigate under the Bakaly Standard and not merely the existing standards and ordinances, which Bakaly has declared insufficient for BCHDs moral obligation in seismic.

Below is the Harvard study.

[https://developingchild.harvard.edu/wp-content/uploads/2005/05/Stress\\_Disrupts\\_Architecture\\_Developing\\_Brain-1.pdf](https://developingchild.harvard.edu/wp-content/uploads/2005/05/Stress_Disrupts_Architecture_Developing_Brain-1.pdf)

**Excessive Stress Disrupts the Architecture of the Developing Brain**



## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:01 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: The Aesthetic Impacts of BCHDs 103-foot RCFE are Widespread and Significant  
**Attachments:** Slide2.PNG; Slide3.PNG

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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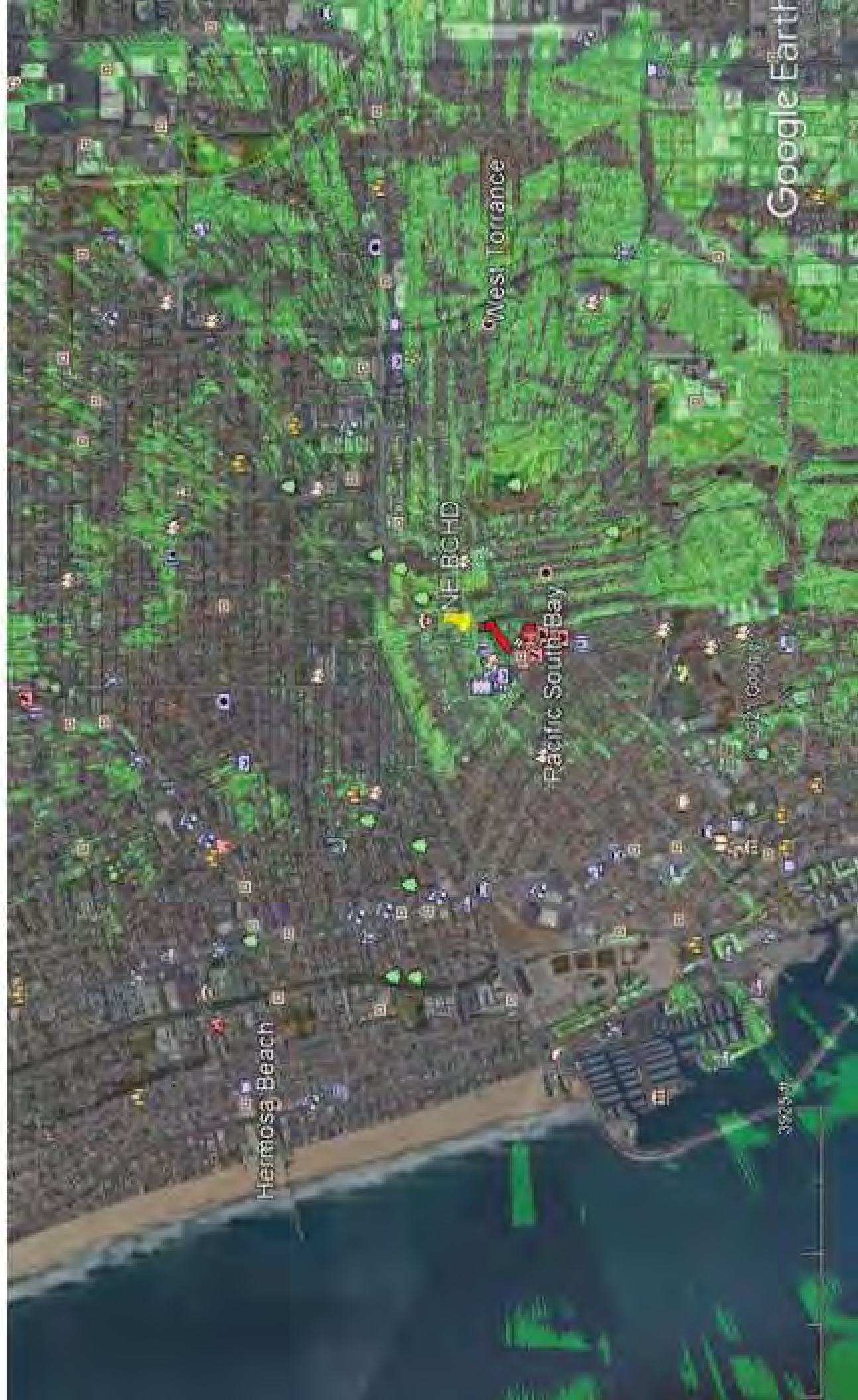
**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, May 20, 2021 3:50 AM  
**To:** EIR <eir@bchd.org>  
**Subject:** The Aesthetic Impacts of BCHDs 103-foot RCFE are Widespread and Significant

MN81-1 | According to the attached analysis slides from Google Earth Pro, the BCHD proposed 103-foot tall building will be visible in a significant viewshed, both in the local Torrance and Redondo Beach neighborhoods, but also more widely.

# Google Earth Pro Results – Green Areas Will Be Able to See the 103-foot BCHD Peak on the NE Side of the Project



Google Earth Pro Results – Green Areas Will Be Able to See the 103-foot BCHD Peak on the NE Side of the Project (Close Up #1)



## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:01 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: DEIR Comment

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, May 20, 2021 4:04 AM  
**To:** EIR <eir@bchd.org>  
**Subject:** DEIR Comment

BCHD moved its 60-foot tall, 2019 plan that more or less uniformly impacted the North and East sides of the failed South Bay Hospital parcel to its 103-foot tall 2021 plan that both increased overall square feet of the above ground campus and nearly doubled the height. BCHD elected to move the 2021 design to the North perimeter of campus, significantly increasing the impacts from the 2019 to 2021 design for the younger, renting, higher density area of people of color between Prospect & Flagler and Beryl & 190th.

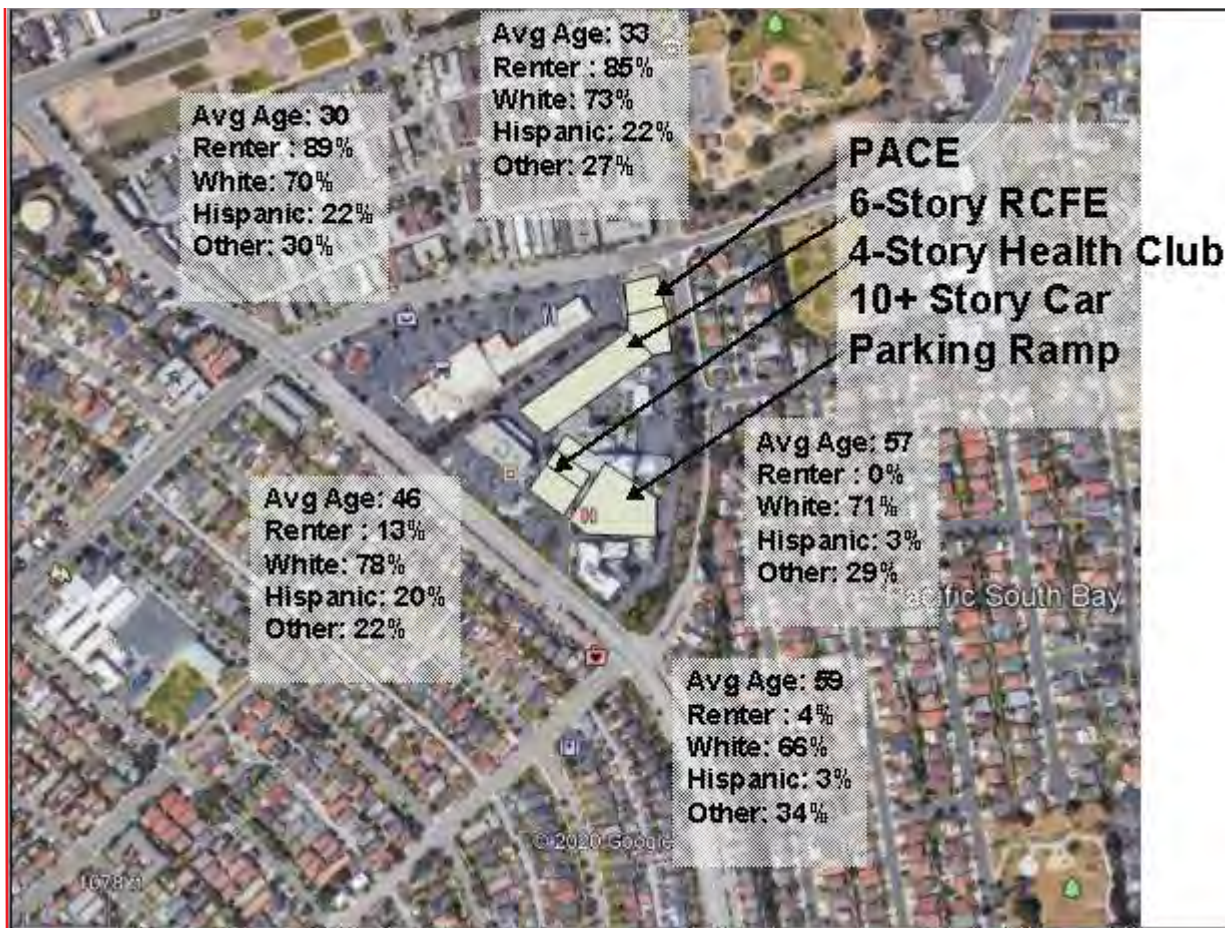
MN82-1 BCHD clearly acquiesced to the demands of the older, more white and affluent residents of Torrance and ignoring environmental justice, elected to impose on the younger, browner, lower income neighborhoods to the North with a 103-foot structure instead of the prior 60-foot 2019 proposal.

BCHD has effectively weaponized environmental justice, imposing on the groups that can do the least to protect themselves for 5+ years of construction harm, aesthetic/nighttime lighting/noise/privacy/traffic/emissions impacts.

Under the Bakaly Standard of mitigation, that impacts caused by BCHD on the community must be mitigated, BCHD has an affirmative obligation to mitigate the environmental justice impact increases it proposed in its 2021 plan.



MN82-1  
(cont.)





## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:02 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: EIR COMMENT - Re: CPRA - Provide diagrams absent non-existent foliage - Response

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---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, May 20, 2021 12:43 PM  
**To:** PRR <PRR@bchd.org>; EIR <eir@bchd.org>  
**Subject:** EIR COMMENT - Re: CPRA - Provide diagrams absent non-existent foliage - Response

BCHD CPRA response is defective. It continues to conceal buildings with non-existent foliage that will not be mature for decades.

EIR Comment - BCHD has a defective and insufficient record on aesthetics and visual impacts. BCHD has obscured the view of the new, 103-foot, 800,000 sqft campus with imaginary trees from a clip art library. As such, the BCHD DEIR is defective, must be corrected, and must be recirculated.

On Thu, May 20, 2021 at 12:38 PM Mark Nelson (Home Gmail) <[menelson@gmail.com](mailto:menelson@gmail.com)> wrote:

And as a reminder, BCHD, and BCHD alone, chose to engage in a nearly half-billion dollar development project DURING COVID. BCHD approved the project at the HEIGHT of Covid in June of 2020. It is clear that BCHD prefers real estate development to public health, despite the Bakaly Standard of moral obligation, based on its choice to pursue development under cover of COVID.

Stop whining and fulfill your public records act requests so that the public can intelligently participate in the CEQA process.

On Mon, May 17, 2021 at 5:51 PM PRR <[PRR@bchd.org](mailto:PRR@bchd.org)> wrote:

Mark,

Please see below for the District's response (in red) to your public records request dated 5/5/21 (in the email below).

**Please see attached PDF.**

**Your above request has also been forwarded to the EIR mailbox and a written response will be provided following the end of the public comment period on the Draft EIR.**

As a reminder, to date (2019-2021), the District has responded to approximately 250 emails containing approximately 531 individual requests/questions from you. Of the 531 individual request/questions received from you, 390 have been closed/answered, 28 have been withdrawn by you and 113 remain open. The District has determined that your numerous requests for public documents will impose an

excessive burden on the District's limited staff and resources, thereby disrupting its ability to provide due attention to its primary government functions. Several of your most recent requests are overly extensive, over-broad, vague, and in many cases unlimited in time and scope. The District'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. Despite the cumulative impact of your limitless and increasing requests imposing an undue burden on the District, we continue to respond to your requests.

**Covid-19 disclaimer:**

Please also note that the District is currently operating under its emergency protocols, which require reallocation of resources to meet the critical needs of the community at this time. As a result, the District's responses to certain public records requests may require more time than normal. We apologize for the inconvenience and are committed to working with the public to provide all requested information as soon as reasonably possible.

Thank you.

---

**From:** Mark Nelson (Home Gmail) <[menelson@gmail.com](mailto:menelson@gmail.com)>  
**Sent:** Wednesday, May 5, 2021 4:48 PM  
**To:** PRR <[PRR@bchd.org](mailto:PRR@bchd.org)>; [eir@bhd.org](mailto:eir@bhd.org)  
**Subject:** CPRA - Provide diagrams absent non-existent foliage

This is both a CPRA request and an EIR Comment

The unnumbered diagram/illustration on 3.1-51 is defective and misleading. None of the foliage currently exists, or, will not be removed in construction. Therefore, absent a surety bond for replacement with mature, 30-50 foot tall foliage, the illustrations are deliberately deceptive and misleading and represent an attempt to mislead the public.

CPRA Request

***Notwithstanding BCHDs insatiable lust to demolish the 514 failed South Bay Hospital building despite the lack of requirement from any ordinance or statute; BCHDs selective "moral obligation" to "protect the community" beyond the requirements of statute or regulation that applies only to the residents, tenants and staff in the 514 failed South Bay Hospital building; BCHDs abject refusal to consider low-cost, tax-free bond financing approved by voters to make affordable the cost of its proposed RCFE and PACE operations; and BCHDs near coma-inducing sloth in replying to California Public Records Act (CPRA) requests related to its nearly \$500M proposed 103-foot tall, 800,000 sqft development and general mismanagement; I bring forward this formal public request under the CPRA:***

All diagrams in the DEIR that contain non-existent mature foliage are defective, deliberately deceptive and misleading to the public. Provide all such diagrams absent the misleading foliage.

MN83-1  
(cont.)



*View of Central Driveway along North Prospect Avenue*



*View from Secondary Driveway on North Prospect Avenue*



*View from North Prospect Avenue & Diamond Street*



*View from Flagler Lane & Towers Street*

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

#### DEIR Comment

All diagrams and illustrations in the DEIR that contain non-existent mature foliage are defective, deliberately deceptive and misleading to the public. Unfortunately, they do not carry illustration numbers to reference. I have embedded an example. The DEIR is misleading and defective and must be repaired and recirculated.

**Navarro, Ashlyn**

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:05 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Board Public Comment and DEIR Public Comment

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Sunday, May 23, 2021 4:41 PM  
**To:** EIR <eir@bchd.org>; Communications <Communications@bchd.org>  
**Subject:** Board Public Comment and DEIR Public Comment

Below is a recent article regarding 3 peer reviewed journal articles pointing to cardiovascular damage from mental illness, such as stress, anxiety, depression and PTSD. Unequivocally, projects like BCHD proposed 103-foot tall, 800,000 sqft 5-year construction project cause stress, anxiety, depression, sleep loss and other mental and physical damages to surrounding neighborhoods. As such, BCHDs project and choices by the Board will also lead to negative cardiovascular impacts in those same areas.

May 14, 2021

## How Mental Health Can Affect Cardiovascular Disease – Positively and Negatively

Steve Fiorillo

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- [Share on Reddit](#)

- Print

- [Share by Email](#)



MN84-1

Patients with mental health disorders may be more likely to engage in detrimental habits while failing to lead a healthier lifestyle.

As May is Mental Health Awareness Month, it is important to think of how mental health care can not only affect a patient's mood and emotional state, but their physical health as well.

If you're assessing patients holistically, you'll want to examine their cardiovascular health, as there are so many associated risk factors and comorbidities. Cardiology specialists should discuss any potential heart issues with their patients who have mental health issues or disorders. How might mental health struggles adversely affect a patient's cardiovascular health, and can improving mental health help improve cardiovascular functionality?

## How Can Mental Health Negatively Affect Cardiovascular Health?

According to the US Centers for Disease Control and Prevention (CDC), many mental health disorders may have cardiologically-related physiologic effects on the body.<sup>1</sup> Depression, anxiety, and post-traumatic stress disorder (PTSD) have been associated with increased blood pressure and heart rate, as well as a reduction in blood flow to the heart.

Some of this can be attributed to the increased adrenaline and cortisol that stress generates in the body.<sup>2</sup> However, these mental health disorders can also manifest after a patient has a cardiovascular event like heart disease or a stroke. Often, these patients are still processing the trauma of their event, experiencing fear of death or another attack, and they may also be worried about the cost of their treatment.

Mental health disorders can also make people more likely to engage in behaviors known to be detrimental to cardiovascular health, like smoking and excessive alcohol consumption. In addition, depressed patients may be less likely to exercise and make healthy lifestyle choices.

## How Can Mental Health Positively Affect Cardiovascular Health?

In early 2021, the American Heart Association published a statement in *Circulation* stressing the importance of boosting patients' psychological health and well-being as a way of improving their cardiovascular health.<sup>3</sup> The study researchers claim that, "positive psychological factors are independently associated with cardiovascular benefits beyond simply the absence of negative states."

These positive factors include optimism, sense of purpose, mindfulness, and life satisfaction. The research findings suggest that cardiologists should be aware of their patients' mental state and actively work to get them the proper treatment upon presentation of any mental distress or decline.

While patients experiencing mental health issues may not feel satisfied or capable of optimism, treatments like behavioral counseling can introduce tools and concepts that allow individuals to manage their struggles.

A 2020 study in *JAMA Network Open* examined how behavioral counseling, care coordination, and care management could affect the cardiovascular health of patients who have a serious mental illness and at least 1 cardiovascular risk factor.<sup>4</sup> The trial participants who were in the intervention group and received this treatment for 18 months showed a 12.7% reduction in the probability of a cardiac event over the next 10 years.

## References

1. US Centers for Disease Control and Prevention. Heart disease and mental health disorders. <https://www.cdc.gov/heartdisease/mentalhealth.htm>. Reviewed May 6, 2020. Accessed May 12, 2021.

MN84-1 2. American Heart Association. Mental health and heart health. <https://www.heart.org/en/healthy-living/healthy-lifestyle/mental-health-and-wellbeing/mental-health-and-heart-health>. Reviewed April 18, 2018. Accessed May 12, 2021.

3. Levine GN, Cohen BE, Commodore-Mensah Y et al. Psychological health, well-being, and the mind-heart-body connection: a scientific statement from the American Heart Association. *Circulation*. 2021;143(10). doi:10.1161/cir.000000000000094



## Navarro, Ashlyn

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:12 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD DEIR Comments

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---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Monday, May 24, 2021 7:43 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** BCHD DEIR Comments

BCHD acknowledged in CWG and public meetings that putting development up against residential neighborhoods would be damaging and provided diagrams and assertions that it would use parking as a buffer. BCHD then ignored its own damages assessment and parking assertions and moved the complex to the edge of the lot increasing both its apparent height and mass significantly over the existing 514 building. BCHD has significant impacts from both Phase 1 and Phase 2 height and mass. Further, BCHD recognized that it had a significant problem, admitted it in presentations demonstrating the HLC parking approach, and then created unmitigated significant impacts. The DEIR analysis of aesthetics is defective by BCHD own standard of #1 below and the Bakaly Moral Obligation Standard.



## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:12 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Comments to BCHD DEIR  
**Attachments:** EXHIBIT E - Settlement agreement.pdf; References - Noise v2.pdf; Noise v2 - Draft.pdf

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Monday, May 24, 2021 7:36 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Comments to BCHD DEIR

Comments to BCHD DEIR

----- Forwarded message -----

**From:** Mark Nelson (Home Gmail) <[menelson@gmail.com](mailto:menelson@gmail.com)>  
**Date:** Fri, Apr 30, 2021 at 4:53 PM  
**Subject:** Fwd: impacts to Towers Elementary Students from BCHDs Proposed Project, Especially Students Aided by IEPs and 504s - Deadline for Intervention June 10, 2021  
**To:** <[towerspta@gmail.com](mailto:towerspta@gmail.com)>, Cc: <[Gerson.Jeremy@tusd.org](mailto:Gerson.Jeremy@tusd.org)>, <[muhammed.anil@tusd.org](mailto:muhammed.anil@tusd.org)>, <[lieu.betty@tusd.org](mailto:lieu.betty@tusd.org)>, <[han.james@tusd.org](mailto:han.james@tusd.org)>, <[park.jasmine@tusd.org](mailto:park.jasmine@tusd.org)>, <[torranceptas@gmail.com](mailto:torranceptas@gmail.com)>, <[superintendent@tusd.org](mailto:superintendent@tusd.org)>, <[murata.jenna@tusd.org](mailto:murata.jenna@tusd.org)>, <[letters@dailybreeze.com](mailto:letters@dailybreeze.com)>  
**Cc:** Steven Keller <[skeller@rbusd.org](mailto:skeller@rbusd.org)>, <[PFurey@torranceca.gov](mailto:PFurey@torranceca.gov)>

Interestingly, I just received a California Public Records Act response from BCHD to the effect that BCHD has a self-declared "moral obligation" to demolish the 514 Hospital building, despite the fact that it meets all LA County and Redondo Beach codes, however, it has only a common, CEQA obligation to everyone else impacted by their 103-foot, 800,000 sqft project.

MN86-1 It's very disappointing to know that BCHD only has moral obligations when it concerns their profit levels and desired activity, and for others, impacts are simply unavoidable. If you will, "too bad, so sad."

The City of Torrance and the TUSD have affirmative obligations, legal and moral, to protect the students at Towers from the emissions, particulates, intermittent noise and vibration, as well as recreation area shading, of the BCHD project.

I have also included BCHDs CPRA reply for your record as well as my original note and attachments.

----- Forwarded message -----

**From:** PRR <[PRR@bchd.org](mailto:PRR@bchd.org)>  
**Date:** Thu, Apr 29, 2021 at 4:13 PM  
**Subject:** PRR #317 - Provide "Moral Obligation" Standards for the Following - Response  
**To:** Mark Nelson (Home Gmail) <[menelson@gmail.com](mailto:menelson@gmail.com)>  
**Cc:** PRR <[PRR@bchd.org](mailto:PRR@bchd.org)>

Mark,

Please see below for the District's response (in red) to your public records request dated 4/16/21 (received by the District on 4/19/21) that reads:

BCHD CEO has asserted that BCHD is following a "moral obligation" standard with regard to its proposed, non-required, voluntary retrofit or demolition of the 514 building. The standard is discussed at [https://www.youtube.com/watch?v=RCOX\\_GrreIY](https://www.youtube.com/watch?v=RCOX_GrreIY) and an excerpt from the Youtube transcript is:

**it is currently not required**

**00:41**

**to be upgraded however we are a health**

**00:44**

**district we are a health district**

**00:46**

**that has a moral obligation to be**

**00:48**

**proactive**

**00:49**

**and protect the people in our community**

Since BCHD clearly is using a "moral obligation" standard to justify its desire to demolish the 514 building, it is both moral and ethical that BCHD uses the same more stringent than ordinances, rules and laws "moral obligation" standard for all other damages to the surrounding community in order to "protect" it from BCHD induced harm.

**MN86-2** For the following proposed project damages to the surrounding neighborhood listed below, **provide documents detailing the levels of BCHD's "moral obligation" to "protect the people"**. Appropriate documentation measures include quantitative units, such as hours per week, peak dBA, PPM PM2.5 and PM10, etc.

1) What is the moral obligation level of noise that BCHD considers acceptable to protect the people surrounding the project during both construction and ongoing operation?

2) What is the moral obligation level of Blue Zones "silent killer" chronic stress that BCHD considers acceptable to protect the people surrounding the project during both construction and ongoing operation?

3) What is the moral obligation level of diminished recreational value of the Towers sports fields from shading/shadowing that BCHD considers acceptable to protect the people surrounding the project during both construction and ongoing operation?

4) What is the moral obligation level of intermittent noise distraction that BCHD considers acceptable to protect the K-5 students at Towers Elementary during both construction and ongoing operation?

5) What is the moral obligation level of particulate matter emissions that BCHD considers acceptable to protect the K-5 students at Towers Elementary during both construction and ongoing operation?

6) What is the moral obligation level of diminished recreational value of the Towers sports fields from shading/shadowing that BCHD considers acceptable to protect the people surrounding the project during both construction and ongoing operation?

MN86-3  
(cont.)

- 7) What is the moral obligation level of particulate matter emissions that BCHD considers acceptable to protect the surrounding homeowners during both construction and ongoing operation?
- 8) What is the moral obligation level of total environmental justice damages that residents in 90277 should suffer to provide RCFE housing to 96% non-90277 residents, including noise, traffic, vibration, emissions, glare, excess nighttime lighting, chronic stress and the prior 60-years of EJ damages?

Please reference the link below to the Draft Environmental Report which describes the requirements of CEQA as they apply to the proposed project:

[https://www.bchdfiles.com/docs/hlc/BCHD\\_DEIR\\_For%20Print\\_031021.pdf](https://www.bchdfiles.com/docs/hlc/BCHD_DEIR_For%20Print_031021.pdf)

If you have further comment, please submit to [EIR@bchd.org](mailto:EIR@bchd.org) and a written response will be provided following the end of the public comment period on the Draft EIR.

----- Forwarded message -----

From: **Mark Nelson (Home Gmail)** <[menelson@gmail.com](mailto:menelson@gmail.com)>

Date: Wed, Mar 31, 2021 at 3:28 PM

Subject: impacts to Towers Elementary Students from BCHDs Proposed Project, Especially Students Aided by IEPs and 504s - Deadline for Intervention June 10, 2021

To: <[towerspta@gmail.com](mailto:towerspta@gmail.com)>

Cc: <[Gerson.Jeremy@tUSD.org](mailto:Gerson.Jeremy@tUSD.org)>, <[muhammed.anil@tUSD.org](mailto:muhammed.anil@tUSD.org)>, <[lieu.betty@tUSD.org](mailto:lieu.betty@tUSD.org)>, <[han.james@tUSD.org](mailto:han.james@tUSD.org)>, <[park.jasmine@tUSD.org](mailto:park.jasmine@tUSD.org)>, <[torranceptas@gmail.com](mailto:torranceptas@gmail.com)>, <[superintendent@tUSD.org](mailto:superintendent@tUSD.org)>

This is a long note - bear with me - the topic is important and the material is complicated and detailed

Dear Towers and Torrance PTAs and TUSD Board and Superintendent:

Towers students, especially those with IEPs and 504s are about to be impacted by BCHDs proposed 800,000 sqft, 103-foot tall, 5-year development. BCHDs consulting firm, Wood PLC, a UK-based multinational that provides support in the tar sands of Canada, an oil refinery adjacent to the Theo Roosevelt National Park, and earned a spot on the Wreckers of the Earth list completed the draft Environmental Impact Report (DEIR). The DEIR finds that there are no impacts to Towers, either from the 5-years of construction at the BCHD site, or, from the thousands of full and empty heavy truck trips BCHD proposed down Beryl past Towers. BCHD used an averaging of noise technique to make their finding. Think of the technique as one foot in boiling water, and one foot in ice water. On average, all is well.

All of us who have children with special needs know that loud noises and vibrations can cause them significant impacts of attention and focus, even if "on average" the noises don't damage hearing. BCHD is using the wrong standard. Our standard is our children, their cognitive development, and their education. They are impacted long before hearing loss occurs. Even so-called neurotypical students are impacted, as the attached journal articles document.

Recently a school in Los Angeles sued a developer and received "accommodations" to construction next to their school. The accommodations appear to require construction only when the school is not in session. I am attaching the settlement agreement for your own reading. What should the rest of us do who are not so fortunate? Here's a link to a story about the situation. It is painfully similar to Towers. <https://www.courthousenews.com/la-fights-disabled-students-claims-of-discrimination-in-city-planning/>

I am a parent, a retired executive experienced in development and environmental analysis, and I spent over 3 years as a BCHD volunteer on the project attempting (somewhat unsuccessfully) to protect the surrounding community. BCHD "cancelled" our community working group after nearly 4 years and replaced us with hand-picked advisers, chosen by the BCHD Board. I can only assume that our well-educated, experienced group just wasn't cooperative enough in allowing BCHD to be a commercial developer.

Over 1,200 neighbors signed a petition against the size of the project. In response, BCHD increased it from 60-feet to 103-feet and moved 160,000 sqft of parking from underground to a massive parking ramp at Prospect and Diamond. Taller and Bigger. As others noted, you cannot make this stuff up. Of course BCHD claims they reduced the size of the project - they don't count 160,000 sqft of aboveground parking ramp being any different than underground. That's craziness.

MN86-3 (cont.) I continue to do what I can to protect the surrounding neighborhoods along with others. I will share and file detailed comments on the project before the June 2021 deadline. I will work to use my experience to help neighborhood groups.

If you have parents that are lawyers, I suggest you loop them in unless you believe a few thousand trucks, both rattling and empty and also full of concrete debris, asbestos, steel, and plain old dirt rolling past Towers for 5-years truly won't impact the school. No noise, no vibration, no dust? I cannot agree with that, but I've gotten dirty doing projects and know the difference between real development and what project developers spout.

No matter what, I believe you should distribute [TRAOnews.org](http://TRAOnews.org), your local neighborhood group's website so that parents can learn about the development and make their own assessments. TRAO has good folks participating and I'm confident they'll put in good comments in June against this monster project.

But as someone who has fought for students with IEPs and 504s, I believe Towers and TUSD need to get involved ASAP to protect the kids.

Mark Nelson  
Redondo  
3+ Year volunteer BCHD Community Working Group

#### Attachments

- 1) Settlement Agreement to Protect an LA School]
- 2) Draft Comments to BCHD on their flawed noise analysis and failure to protect ADA and 504 students
- 3) Hundreds of peer-reviewed, evidence-based resources on why noise and disruption cannot be accepted for our classrooms

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:12 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Comment to DEIR

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Tuesday, May 25, 2021 12:53 AM  
**To:** EIR <eir@bchd.org>  
**Subject:** Public Comment to DEIR

I support the comments from TRAO, the neighborhood organization that collected over 1,200 signatures on a petition stating that the 2019, 60-foot design was too tall and too big. The March 2021 design is nearly twice as tall with 10% more above ground buildings. It is clear that TRAO and the 1,200 petitioners were ignored.

The TRAO comments are reproduced below and entered into the formal CEQA record via this email as comments to the DEIR.

## REASONS TO OPPOSE

**5+ years of construction = PERMANENT damage to our community and quality of life.**

### MASSIVE

### *CLEARLY INCOMPATIBLE WITH SURROUNDING NEIGHBORHOODS*

- BCHD proposed buildings are wholly incompatible with the surrounding neighborhoods, and disruptive for the location. Completed construction is 300% larger than currently exists.
  - Though BCHD claims the revised version of the campus is "smaller" the Phase 1 design is actually TALLER (6 stories vs. 4 and 103 ft. tall vs. 60 ft.
  - The massive luxury Assisted Living Facility (RCFE) would be the TALLEST building in all three of the beach cities (save two condos built in the early 1970s in Redondo Beach). It's on a HIGHLY visible elevated site rising 30 ft. above street level. The massive facility is 103 ft. tall and sits 133.5 ft. above homes.
- The proposed 6-story, city blocks-long assisted living building and 8-story parking garage will block views, reduce sunlight, cast long shadows and impact the privacy of surrounding homes in all directions.
- The 11-acre construction site sits on a bluff, 30 ft. above street level, and another 30 ft. above homes to the east.

[Learn more...](#)

## NOISE

### ***CANNOT BE MITIGATED***

- Per the DEIR: CONSTRUCTION NOISE CANNOT BE MITIGATED – EXCEEDS Federal Transit Administration (FTA) THRESHOLD for the entire 5+ years of construction. Impact is Significant.
  - “The construction noise levels would **exceed Federal Transit Administration (FTA) thresholds and this impact would remain significant and unavoidable** during both Phase 1 and Phase 2 of the proposed Project.
  - From the DEIR: “Construction-related noise would be significant. Construction activities associated with proposed Project... would result in a temporary, but prolonged increase in noise levels at the following noise-sensitive residential areas:
    3. Beryl Street between North Prospect and Flagler Lane\
    4. Flagler Lane and Flagler Alley between Beryl Street and North Prospect Avenue
    5. Diamond Street between Flagler Alley and North Prospect Avenue
    6. North Prospect Avenue between Diamond Street and Beryl Street.”
- More than 60 hours of construction per week. 6 days a week of construction; (7:30 a.m. to 6:00 p.m. Monday through Friday; and 9:00 a.m. to 5:00 p.m. on Saturdays)

[Learn more...](#)

## TRAFFIC

- Increased traffic, congestion and safety issues will overwhelm nearby neighborhood streets with nearly **10,000 heavy haul trips** planned during construction, not counting worker trips.
- **Heavy haul truck route** - Hawthorne Blvd in Torrance to Del Amo Blvd to N. Prospect on to the site past homes and West High School. Heavy haul truck egress is from Flagler site to Beryl, directly behind Towers Elementary to 190th; directly on busy school drop-off and pick-up zone.
- All major surrounding thoroughfares and intersections in the cities of Redondo Beach and Torrance will be impacted.

[Learn more...](#)

## HAZARDS

- The proposed project will expose thousands of residents, the public, and nearby schools to a minimum of 5 ACTIVE years of demolition and construction, hazardous cancer-causing pollutants, noise, vibration, and daily disruptions.
  - Towers Elementary school with 600+ school children aged 4-10, teachers and staff is located just 350 ft. downwind from the demolition and construction site
  - Beryl Heights Elementary school with 450+ school children is ~900 ft. away



MN87-5  
(cont.)

- Redondo Union and West High schools with over 5,000 students combined are 0.3 and 0.7 miles away.

MN87-6

- Hazardous VOCs (volatile organic compounds) and carcinogens were found on the site. According to the [Phase II Environmental Assessment Report](#) by Converse Consultants dated 2/26/20. PCE (perchloroethylene) was detected in 29 of 30 samples, with findings of levels in amounts up to 150 times the allowable residential screening level.

## POOR USE OF TAXPAYER FUNDS

MN87-7

- **The BCHD project would be the ONLY neighborhood incompatible use of a P-CF zoned site in Redondo Beach.** All other 6 P-CF zoned parcels besides BCHD are 2 stories or less: Andrews Park, North Branch Library, Grant Fire Station, Broadway Fire Station, Beryl Maintenance Yard/Police Range, etc.
- Land zoned P-CF should not be used for private developers. RCFEs are commercial enterprises that belong in commercial/residential zones.
- The public health district has strayed far beyond its mission, now planning to "gift" public land in a very long-term lease (likely ~50 to 100-years) to private developers for it's massive \$374M assisted living project.

MN87-8

- BCHD plans a 20/80 business partnership where they retain only 20% interest.
- BCHD is using \$7.6M of taxpayer money for HLC Pre-development planning
- According to the Market Feasibility Study performed by their consultants MDS
  - 80% of target renters are from outside the Beach Cities
  - Only 9% of the target renters live in Redondo Beach,
- Redondo Beach public services such as Fire Department/Paramedics will be excessively taxed with the 24/7 operation of the proposed 325-bed assisted living and 400+ PACE program.
- BCHD refuses to take responsible actions that any public entity is required to do - live within their means and reduce expenses when necessary
- South Bay Hospital - the only construction ever voter-approved on the site, was sized exclusively for the Beach Cities.

## BCHD - MISSION CREEP and NON-TRANSPARENCY

MN87-9

- BCHD is the BOTH the Lead Agency and Certifier/Approver of its own EIR. They can cite "overriding considerations" to un-mitigatable hazards, which are already included in a budgeted line item in BCHD EIR financials.

MN87-10

- Rather than going for a public vote for a bond to finance a retrofit of the building, as is common for public agencies, BCHD has chosen to avoid going to the taxpayer/owners and chose "development" over this option, as Bakaly stated in the Dec. 2020 Board meeting.

MN87-11

- BCHD's perceived "moneymaker" - the massive luxury RCFE is built in Phase 1. Phase 2 is the "Community" portion of the project is not funded.
- BCHD's seismic consultants clearly stated that there is no legal obligation to retrofit the 514 hospital building and that it can likely be used until 2040. Ultimately, retrofitting and remodeling the building is clearly a responsible choice.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:14 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: CPRA Requests

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Tuesday, May 25, 2021 8:27 PM  
**To:** Communications <Communications@bchd.org>; EIR <eir@bchd.org>  
**Subject:** CPRA Requests

MN88-1 | It is clear that CPRA responses are significantly delinquent on the DEIR and have prevented intelligent participation. BCHD, and BCHD alone, chose to proceed with the DEIR under cover of Covid and BCHD, and BCHD alone, is at fault for failure to perform.

## Navarro, Ashlyn

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:18 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: DEIR Comment - Inconsistent Height and Defective DEIR Analysis

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, May 27, 2021 12:08 PM  
**To:** EIR <eir@bchd.org>; Brandy Forbes <brandy.forbes@redondo.org>  
**Subject:** DEIR Comment - Inconsistent Height and Defective DEIR Analysis

The BCHD DEIR errs in the composition of its table of building heights. Redondo Beach is the final permitting authority regarding the BCHD project, and as such, the only relevant metric is the construction of tall buildings in residential 30-foot neighborhoods in Redondo Beach. The table is reproduced below deleting non-Redondo Beach buildings.

As is clear, no building of 103-feet has been allowed in Redondo Beach since 1974. That is a de facto prohibition.

Furthermore, no building over 70-feet has been allowed in Redondo Beach since 1980. That is a de facto prohibition.

BCHD 103-foot tall, 793,000 sqft compound, in a joint venture that will be minimally-owned by BCHD is inconsistent with the surrounding 30-foot residential zoning and is inconsistent with 40-50 years of Redondo Beach permitting. Furthermore, the compound is constructed on public land as a commercial use with market rents to serve more than 90% non-residents of Redondo Beach. Redondo Beach's PUBLIC lands are limited and commercial use cannot be allowed.

### 3.1 AESTHETICS AND VISUAL RESOURCES

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

Building	Number of Stories	Building Height	Year Built
<b>Redondo Beach</b>			
Ocean Plaza	10	122	1974
Delphi Apartments	9	110	1973
Apartments at King Harbor	6	73	1973
230 South Catalina Avenue	6	73	1974
510-520 The Village	6	73	1980
140 The Village	6	73	1980
130 The Village	6	73	1980
120 The Village	6	73	1980
110 The Village	6	73	1980
200 South Catalina Avenue	6	73	1972
The Sand Castle	6	73	1971

cc: Redondo Beach Planning Commission

## Navarro, Ashlyn

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:18 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: DEIR Comment

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, May 27, 2021 12:23 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** DEIR Comment

BCHD has denied the public intelligent participation in the DEIR process by failing to fulfil California Public Record Act requests regarding the Board approved 75-foot tall project beginning in June of 2020 and BCHD has also failed to fulfill requests regarding the never-before-seen 103-foot tall DEIR project that was in the DEIR in March of 2021.

BCHD table of delinquency is below.



Live Well.

Request Closed, Open & Withdrawn by Month				
Month	Closed	Open	Withdrawn	Total
Jan-20	14	0		14
Feb-20	3	0		3
Mar-20	1	0	1	2
Apr-20	8	0		8
May-20	36	0		36
Jun-20	112	23	1	136
Jul-20	17	0		17
Aug-20	13	1		14
Sep-20	69	8	11	88
Oct-20	51	0	9	60
Nov-20	52	5	6	63
Dec-20	33	7		40
Jan-21	26	6		32
Feb-21	14	19		33
Mar-21	19	20		39
Apr-21	23	17		40
May-21		12		12
<b>TOTAL</b>	<b>491</b>	<b>118</b>	<b>28</b>	<b>637</b>
<b>% of Total</b>	<b>77%</b>	<b>19%</b>	<b>4%</b>	<b>100%</b>

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:19 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD Board, DEIR, and pre-CUP Comments - Excess Outdoor Nighttime Lighting

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, May 27, 2021 5:27 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Fwd: BCHD Board, DEIR, and pre-CUP Comments - Excess Outdoor Nighttime Lighting

The following is filed as an EIR comment on the health damages directly caused by BCHD from current and future sources of excess nighttime lighting, including but not limited to signage, security lighting, building window lighting, emergency vehicles, and reflected glare.

----- Forwarded message -----

**From:** Mark Nelson (Home Gmail) <[menelson@gmail.com](mailto:menelson@gmail.com)>  
**Date:** Thu, Oct 1, 2020 at 1:10 AM  
**Subject:** BCHD Board, DEIR, and pre-CUP Comments - Excess Outdoor Nighttime Lighting  
**To:** EIR <[eir@bchd.org](mailto:eir@bchd.org)>, Communications <[communications@bchd.org](mailto:communications@bchd.org)>  
**Cc:** <[michelle.bholat@bchd.org](mailto:michelle.bholat@bchd.org)>, <[noel.chun@bchd.org](mailto:noel.chun@bchd.org)>, <[vish.chatterji@bchd.org](mailto:vish.chatterji@bchd.org)>, <[jane.diehl@bchd.org](mailto:jane.diehl@bchd.org)>, <[vanessa.poster@bchd.org](mailto:vanessa.poster@bchd.org)>, Eleanor Manzano <[eleanor.manzano@redondo.org](mailto:eleanor.manzano@redondo.org)>, <[CityClerk@torranceca.gov](mailto:CityClerk@torranceca.gov)>, <[cityclerk@redondo.org](mailto:cityclerk@redondo.org)>, Brandy Forbes <[brandy.forbes@redondo.org](mailto:brandy.forbes@redondo.org)>

BCHD asserts that it has never damaged the surrounding neighborhoods, despite 60 years of South Bay Hospital, medical office buildings, and various BCHD commercial operation with significant excavation, initial construction, 510 and 520 building construction, excess traffic and hazards, excess tailpipe exhaust and PMx, 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. BCHD makes its assertion in its project FAQs.

<https://www.bchdcampus.org/faq>

<https://www.bluezones.com/2019/05/how-stress-makes-us-sick-and-affects-immunity-inflammation-digestion/>

<https://www.bluezones.com/2012/03/maximize-health-and-longevity-using-these-stress-management-strategies/>

<https://americanbrainsociety.org/stress-the-silent-killer/>

As a health enterprise, BCHD should have ample health information and no issues defending its assertion of no surrounding neighborhood damages on each and every point above for the 60 years prior to this proposed project, for project construction, and for project operation. BCHD has also asserted to the Redondo Beach City Attorney that this project "Clearly ... has significant benefits to Redondo Beach residents" despite the fact that BCHD admits in CPRA responses that it doesn't (and hasn't for 25+ years) track its costs at the 40+ so-called evidence-based program level, nor does it assess benefits, nor does it monetize benefits, nor does it compute benefit-to-cost or net benefits. Further, BCHD admits in CPRA responses that it has not investigated economic injustice/property value impacts of the prior 60

MN91-1 (cont.) years. Considering BCHDs lack of fundamental cost-benefit analysis, and lack of EJ analysis, BCHDs assertion of no negative impacts on surrounding neighborhoods appears unfounded.

**This required analysis for the DEIR, and comment to the BCHD Board, and Redondo Beach and Torrance Mayors, Councils, and Planning Commissions** highlights excess outdoor nighttime lighting, which has peer-reviewed negative impacts of surrounding residents in NIH published studies, with probability greater than 99.99%, rendering BCHDs assertion of no negative impacts on the surrounding neighborhoods to be a bald-faced lie with no supporting data. BCHD also has other negative impacts that will be demonstrated in subsequent comments and required DEIR analyses.

Unlike nearly every BCHD evaluation, study or survey, this NIH published study is highly scientific and statistically significant.

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4863221/>

MN90-2 An excerpt from the study is below. **BCHD is obligated in its DEIR to evaluate the negative impacts on the surrounding community of all negative externalities, economic and environmental injustices.** These issues will be raised again in the CUP evaluation where BCHD will not be able to sweep inconvenient facts under the rug with gaslighting, as BCHD cannot self-certify the CUP. Nor will BCHD be able to lie the way that it did to the Redondo Beach City Attorney when it asserted that "Clearly, .... the project will have significant benefits to Redondo Beach residents." BCHD has admitted in numerous CPRA responses that it has no analysis or accounting of existing programs. Further, BCHD has refused many CPRA requests asserting that it does not have final work product. As such, it did not have final work product for the City Attorney either, yet, BCHD made the unsubstantiated assertion in a February 15, 2019 letter than it withheld from the public until July 2020.

From the Study - high levels of statistical relevance and certainty that BCHD and SBH-like outdoor nighttime lighting (ONL) causes DAMAGES to surrounding residential neighborhoods.

#### Results:

Living in areas with greater ONL was associated with delayed bedtime ( $P < 0.0001$ ) and wake up time ( $P < 0.0001$ ), shorter sleep duration ( $P < 0.01$ ), and increased daytime sleepiness ( $P < 0.0001$ ). Living in areas with greater ONL also increased the dissatisfaction with sleep quantity and quality ( $P < 0.0001$ ) and the likelihood of having a diagnostic profile congruent with a circadian rhythm disorder ( $P < 0.0001$ ).

#### Conclusions:

Although they improve the overall safety of people and traffic, nighttime lights in our streets and cities are clearly linked with modifications in human sleep behaviors and also impinge on the daytime functioning of individuals living in areas with greater ONL.

Here is an example of even current nighttime lighting impacting the surrounding neighborhoods in a negative manner.



MN90-2  
(cont.)





## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:19 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD Proposes 5% of Benefit and 100% of EJ Damages to 90277  
**Attachments:** BCHD EJ Damages.png

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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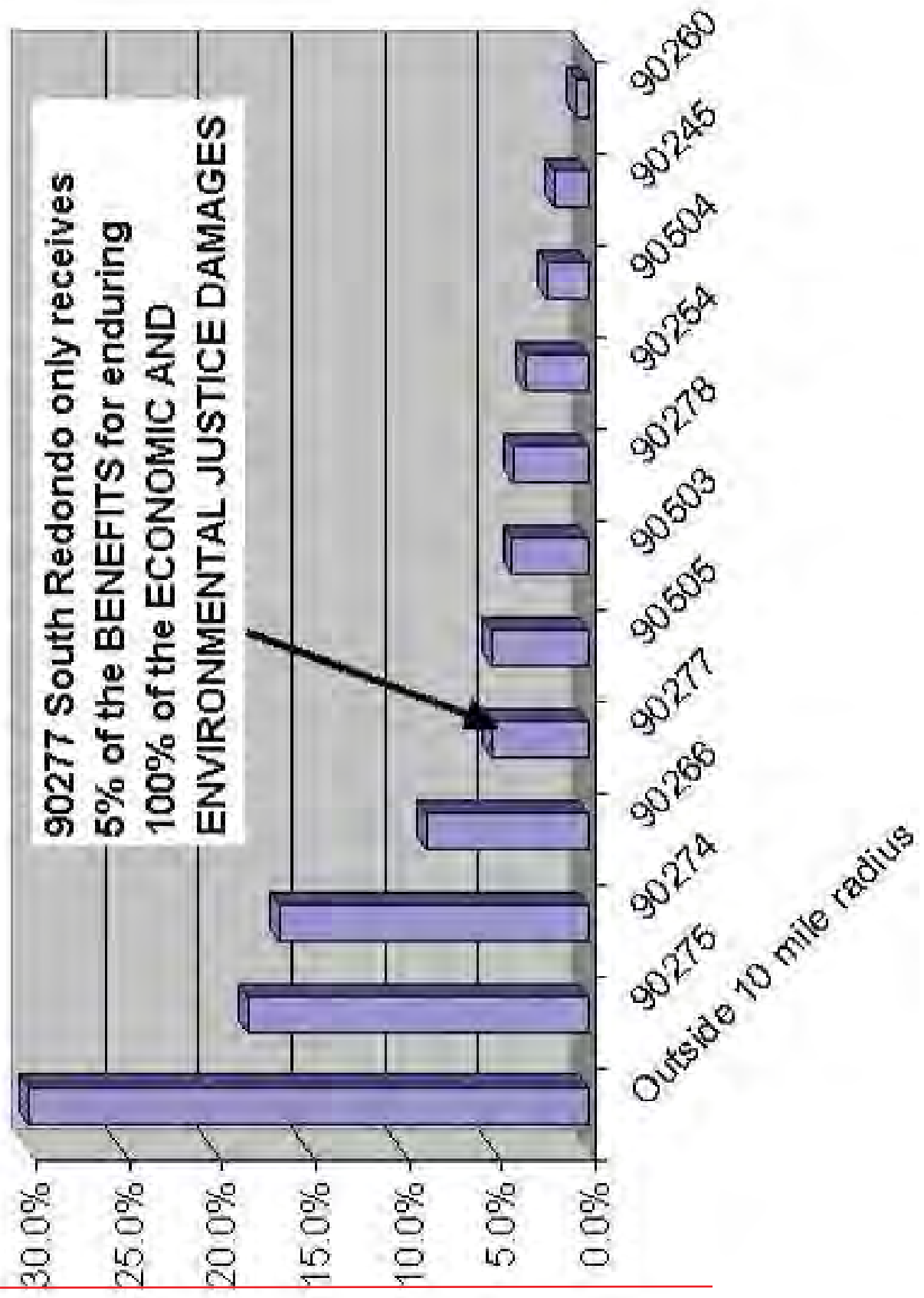
**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, May 27, 2021 6:13 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Fwd: BCHD Proposes 5% of Benefit and 100% of EJ Damages to 90277

DEIR Comment

----- Forwarded message -----

**From:** Mark Nelson (Home Gmail) <[menelson@gmail.com](mailto:menelson@gmail.com)>  
**Date:** Sun, Oct 18, 2020 at 12:56 PM  
**Subject:** BCHD Proposes 5% of Benefit and 100% of EJ Damages to 90277  
**To:** EIR <[eir@bchd.org](mailto:eir@bchd.org)>, Communications <[communications@bchd.org](mailto:communications@bchd.org)>, <[vish.chatterji@bchd.org](mailto:vish.chatterji@bchd.org)>, <[noel.chun@bchd.org](mailto:noel.chun@bchd.org)>, <[jane.diehl@bchd.org](mailto:jane.diehl@bchd.org)>, <[vanessa.poster@bchd.org](mailto:vanessa.poster@bchd.org)>, <[michelle.bholat@bchd.org](mailto:michelle.bholat@bchd.org)>  
**Cc:** Judy Rae <[easyreader@easyreadernews.com](mailto:easyreader@easyreadernews.com)>, Lisa Jacobs <[lisa.jacobs@tbrnews.com](mailto:lisa.jacobs@tbrnews.com)>

# BCHD Consultant MDS Targeted Renters for Senior Housing Project are 80% Outside Manhattan, Hermosa, and Redondo Beach that OWN BCHD



## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:20 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: DEIR Comment - Chronic Stress Health Damages

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Friday, May 28, 2021 10:31 AM  
**To:** EIR <eir@bchd.org>  
**Subject:** DEIR Comment - Chronic Stress Health Damages

BCHD proposes 5 years of construction and wrongly analyzed noise from a perspective of hearing damage, and not from the perspective that intermittent noise will cause stress, and even 1 year will cause chronic stress. Chronic stress is a well understood health damage and BCHD must mitigate its chronic stress damages, as they are significant health impacts to the surrounding area.

### Chronic Stress Causes and Damages

Blue Zones, a vendor of BCHD that BCHD spent over \$2M with, recognizes chronic stress as the silent killer.

<https://linkprotect.cudasvc.com/url?a=https%3a%2f%2feasyreadernews.com%2flockdown-lessons-blue-zones-founder-dan-buettner-on-how-to-make-use-of-staying-at-home%2f&c=E,1,5i1EdvWXwNdJWKE5Xlzf8dDRLuHraZYbB61jz3T5CI3EBhaXHxv-YNlp4etlvJuuVfpQx3otwlgKzcpU6JhNzO5VZefLMSIV8zL-V7AED--TwYw76U2vQ,&typo=1>

### \*Noise Impacts Leading to Chronic Stress Health Damages\*

The following references present peer-reviewed research between noise, chronic stress and negative health impacts. Clearly BCHD as a so-called premiere health agency is required to recognize and mitigate the impacts of chronic stress.

[https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.ncbi.nlm.nih.gov%2fpmc%2farticles%2fPMC5898791%2f&c=E,1,LZVNf1YbrdHjGTUHR8\\_HPDBHTY2XglR81b1pGI0n0rEZMxXuzHXSlwfcGB67nu4sXyVEWcqlZtxlvOn-XF5T96dstWcn8dGYJrKXHMVfRQ,&typo=1](https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.ncbi.nlm.nih.gov%2fpmc%2farticles%2fPMC5898791%2f&c=E,1,LZVNf1YbrdHjGTUHR8_HPDBHTY2XglR81b1pGI0n0rEZMxXuzHXSlwfcGB67nu4sXyVEWcqlZtxlvOn-XF5T96dstWcn8dGYJrKXHMVfRQ,&typo=1)

The Adverse Effects of Environmental Noise Exposure on Oxidative Stress and Cardiovascular Risk

Epidemiological studies have provided evidence that traffic noise exposure is linked to cardiovascular diseases such as arterial hypertension, myocardial infarction, and stroke.

<https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.ncbi.nlm.nih.gov%2fpmc%2farticles%2fPMC1568850%2f&>

[c=E,1,p6xE4rjLfC95IFnul-ZqBnQDYx1pn11TGKKFIZ3TdohmWXpGW06J1-fea8CSu5PaGUhaAxZ4Qi3nMaVNc6-4OCLX\\_Oa15\\_BVyesQJGAS5VDIMy8gTu8,&typo=1](https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.ncbi.nlm.nih.gov%2fpmc%2farticles%2fPMC2996188%2f&c=E,1,p6xE4rjLfC95IFnul-ZqBnQDYx1pn11TGKKFIZ3TdohmWXpGW06J1-fea8CSu5PaGUhaAxZ4Qi3nMaVNc6-4OCLX_Oa15_BVyesQJGAS5VDIMy8gTu8,&typo=1)

Noise and stress: a comprehensive approach.

The thesis of this paper is that research upon, and efforts to prevent or minimize the harmful effects of noise have suffered from the lack of a full appreciation of the ways in which humans process and react to sound.

[https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.ncbi.nlm.nih.gov%2fpmc%2farticles%2fPMC2996188%2f&c=E,1,4kcwNqvZQ7i1kCsONUfbGviT4MCsp0-d8FJW3CrhP4twg0La9DDUtj3v2YJskSQAtU2VYm9hu\\_gU75aEx-y46BMIA--dC2oKRwU9-WduNF4yskBwMU16&typo=1](https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.ncbi.nlm.nih.gov%2fpmc%2farticles%2fPMC2996188%2f&c=E,1,4kcwNqvZQ7i1kCsONUfbGviT4MCsp0-d8FJW3CrhP4twg0La9DDUtj3v2YJskSQAtU2VYm9hu_gU75aEx-y46BMIA--dC2oKRwU9-WduNF4yskBwMU16&typo=1)

Noise and Quality of Life

The psychological effects of noise are usually not well characterized and often ignored. However, their effect can be equally devastating and may include hypertension, tachycardia, increased cortisol release and increased physiologic stress.

[https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.ncbi.nlm.nih.gov%2fpmc%2farticles%2fPMC4873188%2f&c=E,1,PLM7LMzlt7bvPT3Vmdapgj8kPpwBY-FiCf551v6zhr5WG2MtB9APceHgntlohhPZ9\\_kj73iFL4lqrz2TY2qTS7ybOmCW8w\\_WNPuUksGpO5vhTQ,,&typo=1](https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.ncbi.nlm.nih.gov%2fpmc%2farticles%2fPMC4873188%2f&c=E,1,PLM7LMzlt7bvPT3Vmdapgj8kPpwBY-FiCf551v6zhr5WG2MtB9APceHgntlohhPZ9_kj73iFL4lqrz2TY2qTS7ybOmCW8w_WNPuUksGpO5vhTQ,,&typo=1)

Noise Annoyance Is Associated with Depression and Anxiety in the General Population

<https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fpubmed.ncbi.nlm.nih.gov%2f15070524%2f&c=E,1,amIUNf0y0yPjp3FdlqznkB-Uv-wMwm1dqYRM8MU7Yh02UTamdrJfidSpyTW9LQgP9-G4tq8R-nFntC8Y1NES75hU-Xmk0zqnnTCjfe8EEkch0Ev8PIs,&typo=1>

Health effects caused by noise: evidence in the literature from the past 25 years

For an immediate triggering of protective reactions (fight/flight or defeat reactions) the information conveyed by noise is very often more relevant than the sound level. It was shown recently that the first and fastest signal detection is mediated by a subcortical area - the amygdala. For this reason even during sleep the noise from aeroplanes or heavy goods vehicles may be categorised as danger signals and induce the release of stress hormones. In accordance with the noise stress hypothesis, chronic stress hormone dysregulations as well as increases of established endogenous risk factors of ischaemic heart diseases have been observed under long-term environmental noise exposure. Therefore, an increased risk of myocardial infarction is to be expected.

\*Traffic Impacts Leading to Chronic Stress Health Damages\*

[https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fpubmed.ncbi.nlm.nih.gov%2f29936225%2f&c=E,1,XkjVnW9bDbk-1xpgCpV\\_iffsVQgDLwYljLsvxGZ\\_2u768YoN1peUl5GhYgx\\_yAxiG2LCNQSVZe2u20EAspSyTfUnNCnQG6Fc2gjrees\\_mGYtzOfvzlUyA,&typo=1](https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fpubmed.ncbi.nlm.nih.gov%2f29936225%2f&c=E,1,XkjVnW9bDbk-1xpgCpV_iffsVQgDLwYljLsvxGZ_2u768YoN1peUl5GhYgx_yAxiG2LCNQSVZe2u20EAspSyTfUnNCnQG6Fc2gjrees_mGYtzOfvzlUyA,&typo=1)

Chronic traffic noise stress accelerates brain impairment and cognitive decline

[https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.ncbi.nlm.nih.gov%2fpmc%2farticles%2fPMC7503511%2f&c=E,1,yYUoBC8SYh1i1xbmaC1uxYmk1hS5EgWExG5fEcG64idOUwXlmbF65dB7IJ0YIX8cBly\\_zybHTSJ7rGI0995x4szx6JQg5vIlgRLILzxc4JWB-qF4jFhM2eoJgCz-&typo=1](https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.ncbi.nlm.nih.gov%2fpmc%2farticles%2fPMC7503511%2f&c=E,1,yYUoBC8SYh1i1xbmaC1uxYmk1hS5EgWExG5fEcG64idOUwXlmbF65dB7IJ0YIX8cBly_zybHTSJ7rGI0995x4szx6JQg5vIlgRLILzxc4JWB-qF4jFhM2eoJgCz-&typo=1)

Traffic Noise and Mental Health: A Systematic Review and Meta-Analysis  
Public policies to reduce environmental traffic noise might not only

increase wellness (by reducing noise-induced annoyance), but might contribute to the prevention of depression and anxiety disorders

[https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.ncbi.nlm.nih.gov%2fpmc%2farticles%2fPMC2535640%2f&c=E,1,x-kt2whyNU-femHcfYcmUHYmyT\\_roRPECEnAR-K3-9roBCXpLSOv4c13KoPLgX1WarOyBgg7KZ-BMc\\_xbuywztF3rY\\_3jZC8p8oXoTk-tSeDI8V761g,&typo=1](https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.ncbi.nlm.nih.gov%2fpmc%2farticles%2fPMC2535640%2f&c=E,1,x-kt2whyNU-femHcfYcmUHYmyT_roRPECEnAR-K3-9roBCXpLSOv4c13KoPLgX1WarOyBgg7KZ-BMc_xbuywztF3rY_3jZC8p8oXoTk-tSeDI8V761g,&typo=1)

Traffic-Related Air Pollution and Stress: Effects on Asthma

Acute and chronic stress produce substantively different physiologic sequelae. Acute stress can induce bronchodilation with elevated cortisol (possibly masking short-term detrimental respiratory effects of pollution), whereas chronic stress can result in cumulative wear and tear (allostatic load) and suppressed immune function over time, increasing general susceptibility

[https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fpubmed.ncbi.nlm.nih.gov%2f18629323%2f&c=E,1,AJQ0s65Q94ColwstQ0T1SowHyOiyIGVMRIWFI2oZJ\\_yVNuzcqsFDpZb4XC3LOd3iMvtlWP07xNSunZh39yYteQKX36MD1XmbylXzEiwbjZd\\_xqHE5FcPRE1XGYJuq&typo=1](https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fpubmed.ncbi.nlm.nih.gov%2f18629323%2f&c=E,1,AJQ0s65Q94ColwstQ0T1SowHyOiyIGVMRIWFI2oZJ_yVNuzcqsFDpZb4XC3LOd3iMvtlWP07xNSunZh39yYteQKX36MD1XmbylXzEiwbjZd_xqHE5FcPRE1XGYJuq&typo=1)

Chronic traffic-related air pollution and stress interact to predict biologic and clinical outcomes in asthma

The physical and social environments interacted in predicting both biologic and clinical outcomes in children with asthma, suggesting that when pollution exposure is more modest, vulnerability to asthma exacerbations may be heightened in children with higher chronic stress.

\*Sirens/Emergency Vehicles Impacts Leading to Chronic Stress Health Damages and PTSD\*

[https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.ncbi.nlm.nih.gov%2fpmc%2farticles%2fPMC4918669%2f&c=E,1,pbiY08cE\\_PMFHJSPqxH0KaDzisJNt3DR5MDDN1C97Gu869fAQQzSmaXNmWe0XibL5TxTSsQAEuUflbfMhTpYQp0gO\\_HwxknJstBclhA8otOOuak1xvQ,,&typo=1](https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.ncbi.nlm.nih.gov%2fpmc%2farticles%2fPMC4918669%2f&c=E,1,pbiY08cE_PMFHJSPqxH0KaDzisJNt3DR5MDDN1C97Gu869fAQQzSmaXNmWe0XibL5TxTSsQAEuUflbfMhTpYQp0gO_HwxknJstBclhA8otOOuak1xvQ,,&typo=1)

The acute physiological stress response to an emergency alarm and mobilization during the day and at night

[https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.ncbi.nlm.nih.gov%2fpmc%2farticles%2fPMC6540098%2f&c=E,1,lhGC1fd2s2UGkWr9BRDQy9kJda316tjpsYYhkRkaPNZ0KqZ8uNmOD4Xy\\_y73tVjl8FKhn81zJr\\_q86Hh6hv-7-K2kzkEowBiZZ-rwvHzx219D0aUiZx14Rkf&typo=1](https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.ncbi.nlm.nih.gov%2fpmc%2farticles%2fPMC6540098%2f&c=E,1,lhGC1fd2s2UGkWr9BRDQy9kJda316tjpsYYhkRkaPNZ0KqZ8uNmOD4Xy_y73tVjl8FKhn81zJr_q86Hh6hv-7-K2kzkEowBiZZ-rwvHzx219D0aUiZx14Rkf&typo=1)

Impact of Stressful Events on Motivations, Self-Efficacy, and Development of Post-Traumatic Symptoms among Youth Volunteers in Emergency Medical Services

\*Chronic Stress Impacts on the Brain\*

[https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.ncbi.nlm.nih.gov%2fpmc%2farticles%2fPMC5573220%2f&c=E,1,WzAxMBKqoFyULFpAJoMHwnq1DoVOX-zqKwUdh65uW23W2i9UQu1VZkruJHtlvhsi0Bzti2ODn71GKYXFhq9j\\_5VWNm4WCATe49Kfl8eCrFo,&typo=1](https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.ncbi.nlm.nih.gov%2fpmc%2farticles%2fPMC5573220%2f&c=E,1,WzAxMBKqoFyULFpAJoMHwnq1DoVOX-zqKwUdh65uW23W2i9UQu1VZkruJHtlvhsi0Bzti2ODn71GKYXFhq9j_5VWNm4WCATe49Kfl8eCrFo,&typo=1)

Neurobiological and Systemic Effects of Chronic Stress

[https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.ncbi.nlm.nih.gov%2fpmc%2farticles%2fPMC5579396%2f&c=E,1,zcRlc-MoFXsrBV3aWwawSdUbsq\\_0aEfNj2hqa7ELsVXpWLQE7YVBGYm4d0zga8xDhKHBU4byLkJHytu789yX77gvmXwFOcQfm0a\\_k\\_q5e4ynJRuvTys3e&typo=1](https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.ncbi.nlm.nih.gov%2fpmc%2farticles%2fPMC5579396%2f&c=E,1,zcRlc-MoFXsrBV3aWwawSdUbsq_0aEfNj2hqa7ELsVXpWLQE7YVBGYm4d0zga8xDhKHBU4byLkJHytu789yX77gvmXwFOcQfm0a_k_q5e4ynJRuvTys3e&typo=1)

The Impact of Stress on Body Function

As is seen in many, many peer-viewed studies and published frequently by

MN93-1  
(cont.)

MN93-1  
(cont.)

Blue Zones, a vendor of BCHD that BCHD paid \$2M, chronic stress is a direct result of noise, traffic, emergency vehicles and other stressors that BCHD has, and intends to inflict on the surrounding neighborhoods. According to the Bakaly "moral obligation" standard, BCHD must abate any stress impacts to proactively prevent damages to the community.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:20 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD Project Will Cause a Wide Array of Peer-Reviewed Health Impacts and Health Damages  
**Attachments:** BCHDamages.pdf

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Friday, May 28, 2021 10:38 AM  
**To:** EIR <eir@bchd.org>  
**Cc:** Brandy Forbes <brandy.forbes@redondo.org>; Eleanor Manzano <cityclerk@redondo.org>; CityClerk <CityClerk@torranceca.gov>  
**Subject:** BCHD Project Will Cause a Wide Array of Peer-Reviewed Health Impacts and Health Damages

BCHD DEIR is defective as it failed to recognize, quantify and mitigate the many significant health impacts caused by the project construction and operation on surrounding neighborhoods. The attached documents provides peer-reviewed medical and health damages from the BCHD proposed project impacts.

cc: Redondo Beach Mayor, Council, Planning Commission, Torrance Mayor and Council



**Beach Cities Health Damages of the Proposed BCHD Project  
DEIR Comments**

**BCHD MORAL OBLIGATION STANDARD OF HEALTH DAMAGES  
BCHD CEO Bakaly's Stated Obligation of BCHD toward Community Health is below:**

Source: [https://www.youtube.com/watch?v=RCOX\\_GrreIY](https://www.youtube.com/watch?v=RCOX_GrreIY)

Bakaly Transcript

it (ordinance or statute driven seismic upgrades of 514) is currently not required

00:41

to be upgraded however we are a health

00:44

district we are a health district

00:46

that has a moral obligation to be

00:48

proactive

00:49

and protect the people in our community

00:52

As such, BCHD has asserted an obligation to protect the health of the community beyond any published standards, laws, or ordinance.

## **BCHD NEGATIVE HEALTH IMPACTS**

**The following are negative health impacts on the community, along with a long, long list of peer-reviewed citations:**

### **Aesthetics**

Negative Impacts: Glare, Blue Sky Reduction, Excess Nighttime Lighting, Shadowing/Shading

Negative Health Impacts: Mood Disorders, Sleep Disorders, Depression, Job Loss, Domestic Violence, Anxiety

### **Air Quality/Emissions**

Negative Impacts: Particulate Matter, Fugitive Dust, Known VOCs, Medical Waste, Medical Radioactive Waste, Hauling Debris, Concrete Lime Dust

Negative Health Impacts: Developmental Delays, Asthma, COPD, Shortening of Lifespan, Cancer, Alzheimer's, Child-onset Alzheimer's, Breast Cancer, Elderly & Child Pulmonary Disease, Bladder Cancer, Neuroinflammation

### **Land Use**

Negative Impacts: Inconsistency with Surrounding Land Uses, Environmental Injustice, Economic Injustice

Negative Health Impacts: Acute Stress, Chronic Stress, Diminished Health and Nutrition from Reduced Housing Values

### **Noise**

Negative Impacts: Construction Noise, Construction Vibration, Construction Traffic, Intermittent Noise, Operational Noise, Parking Ramp Noise, Special Event Noise, Maintenance Noise, Intermittent Education Interruptions at Towers Elementary, Violation of Towers Student ADA IEP and 504 Plans

Negative Health Impacts: Mood Disorders, Sleep Disorders, Depression, Job Loss, Domestic Violence, Anxiety, Cardiovascular Disease, Stroke, Cognitive Delay

### **Recreation**

Negative Impacts: Shading/Shadowing of Towers Elementary fields, Shading Shadowing of Residential Uses

Negative Health Impacts: Mood Disorders, Sleep Disorders, Depression, Job Loss, Domestic Violence, Anxiety, Cardiovascular Disease, Stroke, Obesity

### **Traffic**

Negative Impacts: Safety, Emissions, Delays, Noise, Vibration, Intermittent Education Interruptions at Towers Elementary, Violation of Towers Student ADA IEP and 504 Plans

Negative Health Impacts: Mood Disorders, Sleep Disorders, Depression, Job Loss, Domestic Violence, Anxiety, Cardiovascular Disease, Stroke, Cognitive Delay, Increased Accidental Injury and Death Rates, Chronic Stress to Commuters and Residents, Breast Cancer, Elderly & Child Pulmonary Disease

## **PEER REVIEWED STUDIES OF BCHD NEGATIVE HEALTH IMPACTS**

**The Following are the Peer-Reviewed Health Damages from the BCHD Development Induced Negative Impacts:**

### **Chronic Stress**

Citations (representative, non-exhaustive):

<https://www.bluezones.com/2019/05/how-stress-makes-us-sick-and-affects-immunity-inflammation-digestion/>

<https://www.bluezones.com/2012/03/maximize-health-and-longevity-using-these-stress-management-strategies/>

<https://americanbrainsociety.org/stress-the-silent-killer/>

Blue Zones, a vendor of BCHD that BCHD spent over \$2M with, recognizes chronic stress as the silent killer. <https://easyreadernews.com/lockdown-lessons-blue-zones-founder-dan-buettner-on-how-to-make-use-of-staying-at-home/>

### **Noise Impacts Leading to Chronic Stress Health Damages**

The following references present peer-reviewed research between noise, chronic stress and negative health impacts. Clearly BCHD as a so-called premiere health agency is required to recognize and mitigate the impacts of chronic stress.

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5898791/>

The Adverse Effects of Environmental Noise Exposure on Oxidative Stress and Cardiovascular Risk  
Epidemiological studies have provided evidence that traffic noise exposure is linked to cardiovascular diseases such as arterial hypertension, myocardial infarction, and stroke.

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1568850/>

Noise and stress: a comprehensive approach.

The thesis of this paper is that research upon, and efforts to prevent or minimize the harmful effects of noise have suffered from the lack of a full appreciation of the ways in which humans process and react to sound.

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2996188/>

Noise and Quality of Life

The psychological effects of noise are usually not well characterized and often ignored. However, their effect can be equally devastating and may include hypertension, tachycardia, increased cortisol release and increased physiologic stress.

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4873188/>

Noise Annoyance Is Associated with Depression and Anxiety in the General Population

<https://pubmed.ncbi.nlm.nih.gov/15070524/>

Health effects caused by noise: evidence in the literature from the past 25 years

For an immediate triggering of protective reactions (fight/flight or defeat reactions) the information conveyed by noise is very often more relevant than the sound level. It was shown recently that the first and fastest signal detection is mediated by a subcortical area - the amygdala. For this reason even during sleep the noise from aeroplanes or heavy goods vehicles may be categorised as danger signals and induce the release of stress hormones. In accordance with the noise stress hypothesis, chronic stress

hormone dysregulations as well as increases of established endogenous risk factors of ischaemic heart diseases have been observed under long-term environmental noise exposure. Therefore, an increased risk of myocardial infarction is to be expected.

### **Traffic Impacts Leading to Chronic Stress Health Damages From Emissions and Noise**

<https://pubmed.ncbi.nlm.nih.gov/29936225/>

Chronic traffic noise stress accelerates brain impairment and cognitive decline

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7503511/>

Traffic Noise and Mental Health: A Systematic Review and Meta-Analysis

Public policies to reduce environmental traffic noise might not only increase wellness (by reducing noise-induced annoyance), but might contribute to the prevention of depression and anxiety disorders

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2535640/>

Traffic-Related Air Pollution and Stress: Effects on Asthma

Acute and chronic stress produce substantively different physiologic sequelae. Acute stress can induce bronchodilation with elevated cortisol (possibly masking short-term detrimental respiratory effects of pollution), whereas chronic stress can result in cumulative wear and tear (allostatic load) and suppressed immune function over time, increasing general susceptibility

<https://pubmed.ncbi.nlm.nih.gov/18629323/>

Chronic traffic-related air pollution and stress interact to predict biologic and clinical outcomes in asthma

The physical and social environments interacted in predicting both biologic and clinical outcomes in children with asthma, suggesting that when pollution exposure is more modest, vulnerability to asthma exacerbations may be heightened in children with higher chronic stress.

Sirens/Emergency Vehicles Impacts Leading to Chronic Stress Health Damages and PTSD

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4918669/>

The acute physiological stress response to an emergency alarm and mobilization during the day and at night

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6540098/>

Impact of Stressful Events on Motivations, Self-Efficacy, and Development of Post-Traumatic Symptoms among Youth Volunteers in Emergency Medical Services

Chronic Stress Impacts on the Brain

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5573220/>

Neurobiological and Systemic Effects of Chronic Stress

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5579396/>

The Impact of Stress on Body Function

### **Sleep and Related Mental Health Disorders**

Causes (includes but not limited to): sources of excess nighttime lighting, including but not limited to signage, security lighting, building window lighting, emergency vehicles, and reflected glare.

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4863221/>

### **Increased Traffic Induced Safety Hazards**

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6823720/>

Road traffic safety: An analysis of the cross-effects of economic, road and population factors

[https://www.cdc.gov/motorvehiclesafety/pedestrian\\_safety/index.html](https://www.cdc.gov/motorvehiclesafety/pedestrian_safety/index.html)

Pedestrian Safety

<http://www.tandfonline.com/doi/abs/10.1080/17457300.2010.517321>

Older adult pedestrian injuries in the United States: causes and contributing circumstances.

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4656869/>

Pedestrian injuries in children: who is most at risk?

<https://pubmed.ncbi.nlm.nih.gov/23684342/>

Effect of nocturnal road traffic noise exposure and annoyance on objective and subjective sleep quality

### **Increased Traffic Induced Emissions Health Hazards**

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2844969/>

Cardiovascular health and particulate vehicular emissions: a critical evaluation of the evidence

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4129915/>

Air pollution and detrimental effects on children's brain. The need for a multidisciplinary approach to the issue complexity and challenges

<https://ehp.niehs.nih.gov/doi/10.1289/ehp299>

Multiple Threats to Child Health from Fossil Fuel Combustion: Impacts of Air Pollution and Climate Change

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4311079/>

Adverse effects of outdoor pollution in the elderly

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5559575/>

Psychological Impact of Vehicle Exhaust Exposure

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5920433/>

Function of PM<sub>2.5</sub> in the pathogenesis of lung cancer and chronic airway inflammatory diseases

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6157824/>

Outdoor particulate matter (PM<sub>10</sub>) exposure and lung cancer risk in the EAGLE study

<https://pubmed.ncbi.nlm.nih.gov/15668476/>

Breast cancer risk and exposure in early life to polycyclic aromatic hydrocarbons using total suspended particulates as a proxy measure

### **Increased Construction and Ongoing Delivery Vehicle Diesel Emissions**

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4894930/>

Diesel exhaust: current knowledge of adverse effects and underlying cellular mechanisms

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5976105/>

Diesel, children and respiratory disease

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5123782/>

Bladder cancer and occupational exposure to diesel and gasoline engine emissions

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3102559/>

Pulmonary effects of inhaled diesel exhaust in aged

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3423304/>

Health effects research and regulation of diesel exhaust: an historical overview focused on lung cancer risk (INCLUDES SCHOOL CHILDREN)

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5920433/>

Function of PM<sub>2.5</sub> in the pathogenesis of lung cancer and chronic airway inflammatory diseases

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6157824/>

Outdoor particulate matter (PM<sub>10</sub>) exposure and lung cancer risk in the EAGLE study

<https://pubmed.ncbi.nlm.nih.gov/15668476/>

Breast cancer risk and exposure in early life to polycyclic aromatic hydrocarbons using total suspended particulates as a proxy measure

### **Increased PM<sub>x</sub> Particulates from All BCHD Sources**

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4740125/>

The impact of PM<sub>2.5</sub> on the human respiratory system (INCLUDES CHILD ASTHMA)

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5017593/>

How air pollution alters brain development: the role of neuroinflammation (INCLUDES IMPACTS ON SCHOOL CHILDREN)

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5920433/>

Function of PM<sub>2.5</sub> in the pathogenesis of lung cancer and chronic airway inflammatory diseases

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6157824/>

Outdoor particulate matter (PM<sub>10</sub>) exposure and lung cancer risk in the EAGLE study

<https://pubmed.ncbi.nlm.nih.gov/15668476/>

Breast cancer risk and exposure in early life to polycyclic aromatic hydrocarbons using total suspended particulates as a proxy measure

<https://ehp.niehs.nih.gov/doi/full/10.1289/EHP4434>

Prenatal Exposure to PM<sub>2.5</sub> and Cardiac Vagal Tone during Infancy: Findings from a Multiethnic Birth Cohort

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4515716/>

PM2.5 and Cardiovascular Diseases in the Elderly: An Overview

<https://pubmed.ncbi.nlm.nih.gov/27567860/>

Cerebrospinal Fluid Biomarkers in Highly Exposed PM2.5 Urbanites: The Risk of Alzheimer's and Parkinson's Diseases in Young Mexico City Residents

### **Base and Increased Emergency Vehicle Noise**

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3915252/>

Fighting Noise Pollution: A Public Health Strategy

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3915267/>

Environmental Noise Pollution in the United States: Developing an Effective Public Health Response

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4918669/>

The acute physiological stress response to an emergency alarm and mobilization during the day and at night

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5898791/>

The Adverse Effects of Environmental Noise Exposure on Oxidative Stress and Cardiovascular Risk

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3502302/>

Experimental Chronic Noise

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6735857/>

Effects of traffic noise exposure on corticosterone, glutathione and tonic immobility

<https://ehp.niehs.nih.gov/doi/pdf/10.1289/ehp.00108s1123>

Noise Exposure and Public Health

### **Window Glare Health Damages**

<https://www.ncbi.nlm.nih.gov/books/NBK218977/>

Light and Glare

<https://global.ctbuh.org/resources/papers/download/2100-when-buildings-attack-their-neighbors-strategies-for-protecting-against-death-rays.pdf>

Facade Design

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3972772/>

Disability Glare in the Aging Eye.

<https://www.researchgate.net/>

Investigation on Visual Discomfort Caused by Reflected Sunlight on Specular Building Facades



## **Shading/Shadowing Impacts**

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2290997/>

Benefits of Sunlight: A Bright Spot for Human Health

<https://pubmed.ncbi.nlm.nih.gov/26098394/>

Sunlight and Vitamin D: Necessary for Public Health

<https://www.nrel.gov/docs/fy02osti/30769.pdf>

A Literature Review of the Effects of Natural Light on Building Occupants

<https://www.tandfonline.com/doi/full/10.1080/13574809.2018.1472523>

Place value: place quality and its impact on health, social, economic and environmental outcomes

## **Night Time Lighting (Signs, Parking Lots, Reflective Glare)**

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2974685/>

Artificial Lighting as a Vector Attractant and Cause of Disease Diffusion

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2627885/>

Switch On the Night: Policies for Smarter Lighting

<https://pubmed.ncbi.nlm.nih.gov/26179558/>

Is part-night lighting an effective measure to limit the impacts of artificial lighting on bats?

<https://pubmed.ncbi.nlm.nih.gov/25526564/>

Protecting the melatonin rhythm through circadian healthy light exposure

<https://www.nih.gov/news-events/news-releases/outdoor-light-linked-teens-sleep-mental-health>

Outdoor light linked with teens' sleep and mental health (Teen Sleep Disorders) excess night lighting from signage,

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2974685/>

Artificial Lighting as a Vector Attractant and Cause of Disease Diffusion

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2627885/>

Switch On the Night: Policies for Smarter Lighting

<https://pubmed.ncbi.nlm.nih.gov/26179558/>

Is part-night lighting an effective measure to limit the impacts of artificial lighting on bats?

<https://pubmed.ncbi.nlm.nih.gov/25526564/>

Protecting the melatonin rhythm through circadian healthy light exposure

<https://www.nih.gov/news-events/news-releases/outdoor-light-linked-teens-sleep-mental-health>

Outdoor light linked with teens' sleep and mental health (Teen Sleep Disorders)

## **Negative Impacts of Operational Noises**

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3531357/>

## Noise Levels Associated with Urban Land Use (Health Impacts)

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3971384/>

Cardiovascular effects of environmental noise exposure

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6068638/>

A Multilevel Analysis of Perceived Noise Pollution

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3988259/>

Auditory and non-auditory effects of noise on health

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4608916/>

Environmental noise and sleep disturbances: A threat to health

<https://pubmed.ncbi.nlm.nih.gov/23684342/>

Effect of nocturnal road traffic noise exposure and annoyance on objective and subjective sleep quality

## Increased Crime from Development, Construction, and the Unhoused

<https://spectrumnews1.com/ca/la-west/news/2019/05/07/crime-among-the-homeless-explodes-in-los-angeles>

Crime Rate Among Homeless Skyrockets in Los Angeles

<https://popcenter.asu.edu/content/homeless-encampments-0>

The Problem of Homeless Encampments

<https://xtown.la/2020/06/23/homeless-crime-los-angeles/>

The number of homeless crime victims and suspects outpaces rise in homeless population

## Health Impacts in Flagler Alley

<https://spectrumnews1.com/ca/la-west/news/2019/05/07/crime-among-the-homeless-explodes-in-los-angeles>

Crime Rate Among Homeless Skyrockets in Los Angeles

<https://popcenter.asu.edu/content/homeless-encampments-0>

The Problem of Homeless Encampments

<https://xtown.la/2020/06/23/homeless-crime-los-angeles/>

The number of homeless crime victims and suspects outpaces rise in homeless population

## Fugitive Dust from Construction

<https://www3.epa.gov/ttn/chief/ap42/ch13/final/c13s02.pdf>

Fugitive Dust Sources

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5920433/>

Function of PM<sub>2.5</sub> in the pathogenesis of lung cancer and chronic airway inflammatory diseases

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6157824/>

Outdoor particulate matter (PM<sub>10</sub>) exposure and lung cancer risk in the EAGLE study

<https://pubmed.ncbi.nlm.nih.gov/15668476/>

Breast cancer risk and exposure in early life to polycyclic aromatic hydrocarbons using total suspended particulates as a proxy measure

### **Construction Noise Impacts**

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4608916/>

Environmental noise and sleep disturbances: A threat to health

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6068638/>

A Multilevel Analysis of Perceived Noise Pollution

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Auditory and non-auditory effects of noise on health

<https://pubmed.ncbi.nlm.nih.gov/23684342/>

Effect of nocturnal road traffic noise exposure and annoyance on objective and subjective sleep quality

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3162363>

Environmental Stressors: The Mental Health Impacts of Living Near Industrial Activity

### **Asbestos Poisoning Impacts**

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4202766/>

Asbestos Exposure among Construction Workers During Demolition

<https://www.sokolovelaw.com/blog/buildings-demolished-without-asbestos-abatement/>

Can Buildings Be Demolished Safely Without Asbestos Abatement?

<https://www.epa.gov/sites/production/files/2016-07/documents/453-b-16-002a.pdf>

Guidelines for Enhanced Management of Asbestos in Water at Ordered Demolitions

[https://www.epa.gov/sites/production/files/2017-06/documents/asbestos\\_scope\\_06-22-17.pdf](https://www.epa.gov/sites/production/files/2017-06/documents/asbestos_scope_06-22-17.pdf)

Scope of Risk Evaluation

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5036735/>

GHG and Asbestos

[https://www.niehs.nih.gov/health/assets/docs\\_f\\_o/](https://www.niehs.nih.gov/health/assets/docs_f_o/)

[homeowners and renters guide to asbestos cleanup after disasters 508.pdf](#)

Homeowners guide to asbestos cleanup

### **Water Runoff Construction and Continuing Operations**

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5954058/>

Evaluation of the impact of construction products on the environment by leaching of possibly hazardous substances

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1448005/>

Public Health Effects of Inadequately Managed Stormwater Runoff

<https://pubmed.ncbi.nlm.nih.gov/21902038/>

Leaching of additives from construction materials to urban storm water runoff

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4149883/>

Storm water contamination

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1862721/>

The challenge posed to children's health by mixtures of toxic waste

### **Negative Impacts of Reduced Privacy**

<https://www.aia.org/pages/22356-designing-for-invisible-injuries-an-explorat?tools=true>

Designing for Invisible Injuries

<https://bridgehousing.com/PDFs/TICB.Paper5.14.pdf>

Trauma Informed Community Building

### **Cardiovascular Risk from Noise**

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3971384/>

Cardiovascular effects of environmental noise exposure

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5898791/>

The Adverse Effects of Environmental Noise Exposure on Oxidative Stress and Cardiovascular Risk

<https://ehp.niehs.nih.gov/doi/pdf/10.1289/ehp.00108s1123>

Noise Exposure and Public Health

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6078840/>

The acute effect of exposure to noise on cardiovascular parameters in young adults

### **Blue Zones (Dan Buettner/BCHD) Damages from Stress/Chronic Stress**

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6125071/>

Dan Buettner - Blue Zones Lessons From the World's Longest Lived

"Stress leads to chronic inflammation, associated with every major age-related disease"

<https://www.bluezones.com/2019/05/how-stress-makes-us-sick-and-affects-immunity-inflammation-digestion/>

## How Stress Makes Us Sick

<https://www.bluezones.com/2012/03/maximize-health-and-longevity-using-these-stress-management-strategies/>

Stress Management Strategies

<https://www.bluezones.com/2018/01/20-habits-healthier-happier-life/>

Avoid Chronic Stress

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1568850/>Noise and Stress: A comprehensive approach  
impaired cognitive function/

Noise and Stress: A comprehensive approach

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3162363/>

Environmental Stressors: The Mental Health Impacts of Living Near Industrial Activity

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2535640/>

Traffic-related Air Pollution and Chronic Stress: Effects on Asthma

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3222511/>

Critical Biological Pathways for Chronic Psychosocial Stress

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:21 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Inappropriate use of Leq for 85dB + Intermittent Noises

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Saturday, May 29, 2021 4:11 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Inappropriate use of Leq for 85dB + Intermittent Noises

Per the City of LA, a reputable source, "For intermittent noise sources, the maximum noise level (Lmax) is normally used to represent the maximum noise level measured during the measurement. Maximum and minimum noise levels, as compared to the Leq, are a function of the characteristics of the noise source."

BCHD attempts to average away the damages of loud equipment and trucks, especially on Towers Students by smoothing out the intermittent noises via Leq.

MN94-1 BCHD DEIR errs when it fails to consider the Lmax impacts of intermittent 85dB trucks and other louder noises from construction on neighbors and especially on Towers Elementary School, where peer-reviewed studies (already filed as comments to the DEIR) are clear that intermittent noises cause cognitive delay and interrupt learning. Also, intermittent noise violates many ADA IEPs and 504 plans of students at Towers Elementary by denying their rights to a distraction free learning environment.

Clearly, as per peer-reviewed studies, the intermittent noise will have stress, education, cardiovascular and other medically significant negative impacts on the community,

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:22 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: DEIR Comment

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Tuesday, June 1, 2021 12:12 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** DEIR Comment

BCHD existing outdoor lighting is in violation of AMA guidelines. Despite repeated attempts, BCHD refuses to consider the negative health impacts of its excess outdoor night time lighting.

MN95-1 No health analysis of the negative impacts is presented in the DEIR. Therefore, the DEIR is defective, must be remedied, and recirculated.

Reference: AMA

<https://www.ama-assn.org/sites/ama-assn.org/files/corp/media-browser/public/about-ama/councils/Council%20Reports/council-on-science-public-health/a16-csaph2.pdf>



## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:24 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Comment on DEIR

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Tuesday, June 1, 2021 6:10 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Public Comment on DEIR

The DEIR contains no analysis of the ongoing potential impacts of Covid or its successor on multi patient rooms, such as memory care. Despite vaccinations, any future facility must have a thorough analysis and mitigation plan for pandemics, especially one that is being fronted by a Health District.

The following is a contemporary reference to the current problems from AP, as of June 1 2021.

<https://news.yahoo.com/despite-vaccines-nursing-homes-struggle-175307895.html>

The DEIR is therefore defective, must be modified and recirculated.

## Navarro, Ashlyn

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:24 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: DEIR Comments

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Tuesday, June 1, 2021 6:28 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** DEIR Comments

BCHD DEIR fails to recognize that BCHDs use of the C-2 is unlawful based on C-2 zoning. According to BCHDs own internal documents, mixed use is prohibited and the total building allowance is less than 8800 sqft. The DEIR errs in its failure to capture, analyze, and recognize this fatal error. The DEIR is defective, must be remediated and recirculated.



## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:24 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: DEIR Comment

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Tuesday, June 1, 2021 7:06 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** DEIR Comment

BCHD proposed project is defective and fails to meet the guiding principles of the project. BCHD provided the following graphic to the CWG, recognizing the damaging impacts of the campus on the surrounding neighborhood and codified perimeter parking as a mitigation. That mitigation does not appear in the DEIR.

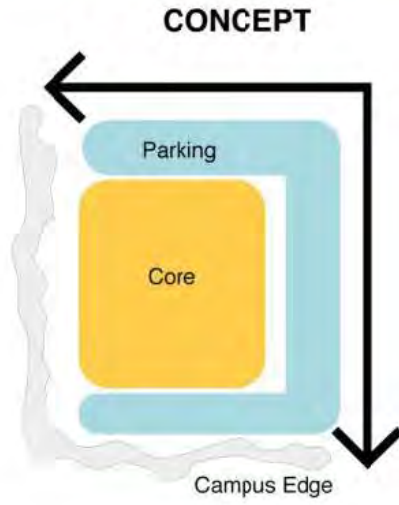
The DEIR is defective, fails to meet the stated principles of the project, must be remediated and recirculated.

From BCHD:

### Healthy Living Campus Project: Guiding Principles

- Develop community for older adults
- Create integrated hub of well-being
- Incorporate Blue Zones Project concepts
- Focus on emerging technologies and innovation
- Grow the enterprise to support the mission
- Actively engage community/stakeholders
- Prioritize environmental sustainability and accessibility
- Create open/green space by shifting parking to the perimeter

## Healthy Living Campus Parking Approach



## Navarro, Ashlyn

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:25 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD delinquency in CPRA Responses has prevented the intelligent participation of the public in the DEIR

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Wednesday, June 2, 2021 11:33 AM  
**To:** EIR <eir@bchd.org>; PRR <PRR@bchd.org>  
**Subject:** BCHD delinquency in CPRA Responses has prevented the intelligent participation of the public in the DEIR

According to BCHDs May 2021 Board Meeting file, BCHD is delinquent 90-days or more on over 80 CPRA requests. BCHD is delinquent 1 full year on 23 requests. Clearly, BCHD cannot argue that allowing a full year did not provide reasonable time, and therefore, BCHD is acting willfully.

Through this willful act of withholding public information, BCHD has deliberately undermined the public's right to intelligent participation in the CEQA process.

This serves as legal notice and a comment into the DEIR public record.



*Live Well. Health Matters.*

Request Closed, Open & Withdrawn by Month				
Month	Closed	Open	Withdrawn	Total
Jan-20	14	0		14
Feb-20	3	0		3
Mar-20	1	0	1	2
Apr-20	8	0		8
May-20	36	0		36
Jun-20	112	23	1	136
Jul-20	17	0		17
Aug-20	13	1		14
Sep-20	69	8	11	88
Oct-20	51	0	9	60
Nov-20	52	5	6	63
Dec-20	33	7		40
Jan-21	26	6		32
Feb-21	14	19		33
Mar-21	19	20		39
Apr-21	23	17		40
May-21		12		12
<b>TOTAL</b>	<b>491</b>	<b>118</b>	<b>28</b>	<b>637</b>
<b>% of Total</b>	<b>77%</b>	<b>19%</b>	<b>4%</b>	<b>100%</b>

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:32 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Comment

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Friday, June 4, 2021 6:06 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Comment

MN100-1

The DEIR analysis of GHGs is defective. BCHDs preferred building material is concrete, with a high carbon content. No where does BCHD compute, account for, or mitigate the GHG from its concrete construction.

It is well known that "Concrete currently accounts for about 8 percent of the carbon dioxide being emitted into the atmosphere, dwarfing the aviation industry's contribution of 2.5 percent. Concrete's contribution of CO2 is comparable to the entire agriculture industry, which is responsible for 9 percent of carbon emissions." As such, it is a very, very significant problem.

BCHD DEIR is defective, must be remediated, and recirculated to include the full impact of building materials to GHGs, including disposal GHG generation.

Current reference: <https://www.ecori.org/climate-change/2019/10/4/global-warming-has-a-co2ncrete-problem>

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:32 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Comment - Aesthetic impacts

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Friday, June 4, 2021 7:25 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Comment - Aesthetic impacts

MN101-1 The DEIR is defective as BCHD failed to conduct both sufficient and appropriate KVL analysis. Based on hedonic models  
MN101-2 and economics, visible commercial development has a negative impact on housing values as a result of the aesthetic  
MN101-3 impact. This implies that the preferences and utility of surrounding homeowners are negatively impacted by tall  
structures, especially 133 feet above the surrounding neighborhoods. BCHD has shirked both prior lead agency roles for  
the 510 and 520 building and has no experience nor pre-existing written evaluation criteria. It is both unfair to  
surrounding neighborhoods and against CEQA to fail to utilize pre-existing local standards for evaluation. BCHD is  
preventing intelligent participation by failing to provide adequate and correct analysis for review.

MN101-4 One of many references is:  
Environmental Economics and Policy 7th Edition  
by Lynne Lewis (Author), Thomas H. Tietenberg (Author)



## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:33 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: DEIR Comment

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Saturday, June 5, 2021 5:23 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** DEIR Comment

MN102-1 | BCHDs DEIR failed to include analysis that correlated negative health impacts with the project's air pollutant emissions, aesthetic shading/sunblocking impacts, aesthetic night time lighting impacts, constant noise impacts, aesthetic glare impacts, intermittent noise impacts, cognitive delays, educational impacts at Towers Elementary, denial of student ADA right, recreation reduction at Towers Elementary fields, increased EMF and other electrical risks from the 4kV substation, toxic water runoff impacts, traffic safety/exhaust/noise impacts, or any other impact. BCHD DEIR is devoid of any all correlations to health impacts and therefore failed to proceed in the manner required by law.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:33 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Comment - Failure of DEIR to incorporate health damages

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Saturday, June 5, 2021 5:01 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Public Comment - Failure of DEIR to incorporate health damages

In my comments, I have provided a litany of peer-reviewed research that demonstrates the mental and physical health impacts from BCHD proposed construction and 50-100 years of continued operation. BCHD provided NO ANALYSIS WHATSOEVER of health impacts in its DEIR, and therefore the DEIR is defective.

MN103-1 Providing NO DISCUSSION of cardiovascular, pulmonary, mental health, brain stem accumulation of PMx in children, and the myriad of other ignored health impacts cannot be construed as "a reasonable effort to substantively connect a project's air quality impacts to likely health consequences." The decision, *Sierra Club v. County of Fresno*, Cal. Supreme Court Case No. S219783 (Dec. 24, 2018), makes clear that EIRs must contain clear and detailed discussion of impact significance determinations, and in particular must explain the nature and magnitude of significant impacts." BCHDs failures run from the negative impacts of intermittent noise, to the negative impacts of excess night time lighting, to the negative impacts of constant construction noise, to the negative health impacts of additional PMx releases, etc. All are heavily documented in my comments and all must be discussed and mitigated.

The defective DEIR must be remedied and recirculated. The California Supreme Court decision is referenced below.

MN103-3 "In an important CEQA case, the California Supreme Court ruled that courts reviewing claims that an Environmental Impact Report (EIR) inadequately discusses environmental impacts must determine whether the EIR "includes sufficient detail" to support informed decisionmaking and public participation. The court also held an EIR must make "a reasonable effort to substantively connect a project's air quality impacts to likely health consequences." The decision, *Sierra Club v. County of Fresno*, Cal. Supreme Court Case No. S219783 (Dec. 24, 2018), makes clear that EIRs must contain clear and detailed discussion of impact significance determinations, and in particular must explain the nature and magnitude of significant impacts."

<https://www.meyersnave.com/ca-supreme-court-establishes-ceqa-rules-eirs-discussion-health-effects/>

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:33 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: CPRA - Correlated Health Impacts from BCHD DEIR

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Saturday, June 5, 2021 5:24 PM  
**To:** PRR <PRR@bchd.org>  
**Cc:** EIR <eir@bchd.org>  
**Subject:** CPRA - Correlated Health Impacts from BCHD DEIR

MN104-1 Provide all documents demonstrating that BCHD conducted correlations between health damages and its potential and actual negative environmental impacts, including but not limited to: the project's air pollutant emissions, aesthetic shading/sunblocking impacts, aesthetic night time lighting impacts, constant noise impacts, aesthetic glare impacts, intermittent noise impacts, cognitive delays, educational impacts at Towers Elementary, denial of student ADA right, recreation reduction at Towers Elementary fields, increased EMF and other electrical risks from the 4kV substation, toxic water runoff impacts, traffic safety/exhaust/noise impacts, or any other impact.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:35 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: CPRA and DEIR Comment

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Sunday, June 6, 2021 10:22 PM  
**To:** EIR <eir@bchd.org>; PRR <PRR@bchd.org>  
**Subject:** CPRA and DEIR Comment

DEIR Comment - The DEIR traffic analysis is defective and fails to meet the City of Redondo request. The DEIR does not consider the impacts of the BCHD 103-foot, 800,000 sqft complex development with 1) Flagler 1 way north and 2) Flagler closed at Beryl.

PRR - Provide all traffic analyses of 1) Flager 1 way north and 2) Flager closed at Beryl for the March 2021 DEIR

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:37 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Comments on BCHD HLC Project DEIR with copies to Responsible Agencies

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Monday, June 7, 2021 4:04 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Fwd: Public Comments on BCHD HLC Project DEIR with copies to Responsible Agencies

DEIR Comments on Health Damages from BCHD Proposed Project

----- Forwarded message -----

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Date:** Tue, Oct 20, 2020 at 10:57 AM  
**Subject:** Public Comments on BCHD HLC Project DEIR with copies to Responsible Agencies  
**To:** Communications <communications@bchd.org>, EIR <eir@bchd.org>, <CityClerk@torranceca.gov>, <cityclerk@redondo.org>  
**Cc:** Brandy Forbes <brandy.forbes@redondo.org>, Judy Rae <easyreader@easyreadernews.com>, Lisa Jacobs <lisa.jacobs@tbrnews.com>

October 19, 2020

BCHD Board of Directors (Public Comment), [communications@bchd.org](mailto:communications@bchd.org)  
City of Redondo Beach Mayor and Council (Public Comment), [cityclerk@redondo.org](mailto:cityclerk@redondo.org)  
City of Torrance Mayor and Council (Public Comment), [cityclerk@torranceca.gov](mailto:cityclerk@torranceca.gov)  
BCHD EIR Team, [EIR@bchd.org](mailto:EIR@bchd.org)

SUBJECT: BCHD Draft EIR Input and Required Analysis Parameters

To whom it may concern:

Beach Cities Health District (BCHD) clearly asserts in its FAQs: **"False Claim: BCHD has harmed the surrounding community for 60 years."** If that statement is a "False Claim", then BCHD is unequivocally denying it has caused damages. There is no other reasonable interpretation. BCHD, in later FAQs emailed from the CEO, contradicted its earlier FAQ and stated: **"False Claim: BCHD asserts that it has never damaged the surrounding neighborhoods."** Clearly, BCHD did deny it damaged the surrounding neighborhoods earlier in its own FAQs, yet it seems to have made a calculation that no one would place its two, mutually exclusive claims side-by-side.

Due to BCHDs apparent confusion and/or lack of candor, the public comments that follow are targeted at the BCHD HLC DEIR and BCHDs obligation to protect surrounding neighborhoods for inclusion in the BCHD Board record, the EIR record and the Torrance and Redondo Beach City Council as public comments. Both

MN106-1 (cont.) Torrance and Redondo Beach have roles as CEQA Responsible Agencies and also as agencies with discretionary authority over the project.

#### BCHD AND SBHD HAVE A 60 YEAR HISTORY OF NEIGHBORHOOD DAMAGE

MN106-2 For over 60 years, BCHD and South Bay Hospital District (SBHD) before it have damaged the surrounding neighborhoods with 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 PM2.5 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. Each of these has peer-reviewed negative health impacts and studies are included.

#### BCHD CEO WAS DIRECTED TO INCLUDE PUBLIC COMMENTS IN THE DEIR ANALYSIS

MN106-3 In its July 22, 2020 Board Meeting, the Board directed the CEO to assure that comments on the DEIR and HLC project would be provided to the EIR team and included in the forthcoming DEIR. This is a comment and DEIR and contains analyses to be included in the DEIR by BCHD due both to CEQA and BCHD special status as a health district with a special obligation to do no harm to the surrounding neighborhoods with its operations.

#### THIS REQUEST POSES NO BURDEN ON BCHD BASED ON ITS PRIOR COMMUNICATIONS

MN106-4 BCHD has asserted to the Redondo Beach City Attorney that this HLC project "Clearly ... has significant benefits to Redondo Beach residents." BCHD represented to a public official "clearly" (meaning beyond a reasonable doubt) the residents of Redondo Beach will have "significant" (meaning exceptional and notable) benefits. The claim was made February 15, 2019 in writing by BCHD counsel. So either BCHD lied to a public official, or, it has the facts needed beyond a reasonable doubt to demonstrate its proposed benefits and damages, and BCHD has had those facts since earlier than February 2019 when it made the claim to the City Attorney of Redondo Beach.

#### A NON-EXHAUSTIVE LIST OF DAMAGES REQUIRED FOR ASSESSMENT BY BCHD

The surrounding neighborhoods including Beryl Heights and Towers Elementary schools have suffered from many environmental and economic injustices and negative externalities for over 60 years caused directly by SBHD and BCHD. The impacts and damages caused by continued operations of BCHD, and proposed campus over-development that must be analyzed and quantified include but are not limited to the following elderly, adult, teen, child and general population impact as supported by peer-reviewed, evidence-based journal research:

MN106-5 **excess traffic-induced safety hazards,**

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6823720/>

Road traffic safety: An analysis of the cross-effects of economic, road and population factors

[https://www.cdc.gov/motorvehiclesafety/pedestrian\\_safety/index.html](https://www.cdc.gov/motorvehiclesafety/pedestrian_safety/index.html)

Pedestrian Safety

<http://www.tandfonline.com/doi/abs/10.1080/17457300.2010.517321>

Older adult pedestrian injuries in the United States: causes and contributing circumstances.

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4656869/>

Pedestrian injuries in children: who is most at risk?

<https://pubmed.ncbi.nlm.nih.gov/23684342/>

Effect of nocturnal road traffic noise exposure and annoyance on objective and subjective sleep quality

MN106-6 **excess traffic-induced ground level tailpipe pollution,**

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2844969/>

Cardiovascular health and particulate vehicular emissions: a critical evaluation of the evidence

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4129915/>

Air pollution and detrimental effects on children's brain. The need for a multidisciplinary approach to the issue complexity and challenges

<https://ehp.niehs.nih.gov/doi/10.1289/ehp299>

Multiple Threats to Child Health from Fossil Fuel Combustion: Impacts of Air Pollution and Climate Change

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4311079/>

Adverse effects of outdoor pollution in the elderly

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5559575/>

Psychological Impact of Vehicle Exhaust Exposure

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5920433/>

Function of PM2.5 in the pathogenesis of lung cancer and chronic airway inflammatory diseases

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6157824/>

Outdoor particulate matter (PM10) exposure and lung cancer risk in the EAGLE study

<https://pubmed.ncbi.nlm.nih.gov/15668476/>

Breast cancer risk and exposure in early life to polycyclic aromatic hydrocarbons using total suspended particulates as a proxy measure

#### **excess delivery vehicle diesel fuel emissions,**

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4894930/>

Diesel exhaust: current knowledge of adverse effects and underlying cellular mechanisms

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5976105/>

Diesel, children and respiratory disease

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5123782/>

Bladder cancer and occupational exposure to diesel and gasoline engine emissions

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3102559/>

Pulmonary effects of inhaled diesel exhaust in aged

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3423304/>

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3423304/>

Health effects research and regulation of diesel exhaust: an historical overview focused on lung cancer risk (INCLUDES SCHOOL CHILDREN)

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5920433/>

Function of PM2.5 in the pathogenesis of lung cancer and chronic airway inflammatory diseases

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6157824/>

Outdoor particulate matter (PM10) exposure and lung cancer risk in the EAGLE study

<https://pubmed.ncbi.nlm.nih.gov/15668476/>

Breast cancer risk and exposure in early life to polycyclic aromatic hydrocarbons using total suspended particulates as a proxy measure

#### **excess PMx particulates,**

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4740125/>

The impact of PM2.5 on the human respiratory system (INCLUDES CHILD ASTHMA)

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5017593/>

How air pollution alters brain development: the role of neuroinflammation (INCLUDES IMPACTS ON SCHOOL CHILDREN)

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5920433/>

Function of PM2.5 in the pathogenesis of lung cancer and chronic airway inflammatory diseases

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6157824/>

Outdoor particulate matter (PM10) exposure and lung cancer risk in the EAGLE study

MN106-6  
(cont.)



<https://pubmed.ncbi.nlm.nih.gov/15668476/>

Breast cancer risk and exposure in early life to polycyclic aromatic hydrocarbons using total suspended particulates as a proxy measure

MN106-6  
(cont.) <https://ehp.niehs.nih.gov/doi/full/10.1289/EHP4434>

Prenatal Exposure to PM2.5 and Cardiac Vagal Tone during Infancy: Findings from a Multiethnic Birth Cohort

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4515716/>

PM2.5 and Cardiovascular Diseases in the Elderly: An Overview

<https://pubmed.ncbi.nlm.nih.gov/27567860/>

Cerebrospinal Fluid Biomarkers in Highly Exposed PM2.5 Urbanites: The Risk of Alzheimer's and Parkinson's Diseases in Young Mexico City Residents

**excess emergency vehicle noise,**

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3915252/>

Fighting Noise Pollution: A Public Health Strategy

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3915267/>

Environmental Noise Pollution in the United States: Developing an Effective Public Health Response

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4918669/>

The acute physiological stress response to an emergency alarm and mobilization during the day and at night

MN106-7 <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5898791/>

The Adverse Effects of Environmental Noise Exposure on Oxidative Stress and Cardiovascular Risk

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3502302/>

Experimental Chronic Noise

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6735857/>

Effects of traffic noise exposure on corticosterone, glutathione and tonic immobility

<https://ehp.niehs.nih.gov/doi/pdf/10.1289/ehp.00108s1123>

Noise Exposure and Public Health

**excess window glare,**

<https://www.ncbi.nlm.nih.gov/books/NBK218977/>

Light and Glare

<https://global.ctbuh.org/resources/papers/download/2100-when-buildings-attack-their-neighbors-strategies-for-protecting-against-death-rays.pdf>

M □ □ □ □ □ Facade Design

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3972772/>

Disability Glare in the Aging Eye.

<https://www.researchgate.net/>

Investigation on Visual Discomfort Caused by Reflected Sunlight on Specular Building Facades

**excess shading caused by tall buildings on a 30 foot hill,**

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2290997/>

Benefits of Sunlight: A Bright Spot for Human Health

<https://pubmed.ncbi.nlm.nih.gov/26098394/>

MN106-9 Sunlight and Vitamin D: Necessary for Public Health

<https://www.nrel.gov/docs/fy02osti/30769.pdf>

A Literature Review of the Effects of Natural Light on Building Occupants

<https://www.tandfonline.com/doi/full/10.1080/13574809.2018.1472523>

Place value: place quality and its impact on health, social, economic and environmental outcomes

MN106-10 **excess night lighting from parking lot lighting,**

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2974685/>

MN106--1  
0 (cont.)

Artificial Lighting as a Vector Attractant and Cause of Disease Diffusion

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2627885/>

Switch On the Night: Policies for Smarter Lighting

<https://pubmed.ncbi.nlm.nih.gov/26179558/>

Is part-night lighting an effective measure to limit the impacts of artificial lighting on bats?

<https://pubmed.ncbi.nlm.nih.gov/25526564/>

Protecting the melatonin rhythm through circadian healthy light exposure

<https://www.nih.gov/news-events/news-releases/outdoor-light-linked-teens-sleep-mental-health>

Outdoor light linked with teens' sleep and mental health (Teen Sleep Disorders)

**excess night lighting from signage,**

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2974685/>

Artificial Lighting as a Vector Attractant and Cause of Disease Diffusion

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2627885/>

Switch On the Night: Policies for Smarter Lighting

<https://pubmed.ncbi.nlm.nih.gov/26179558/>

Is part-night lighting an effective measure to limit the impacts of artificial lighting on bats?

<https://pubmed.ncbi.nlm.nih.gov/25526564/>

Protecting the melatonin rhythm through circadian healthy light exposure

<https://www.nih.gov/news-events/news-releases/outdoor-light-linked-teens-sleep-mental-health>

Outdoor light linked with teens' sleep and mental health (Teen Sleep Disorders)

MN106-11

**excess noise from night time maintenance vehicles and operations,**

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3531357/>

Noise Levels Associated with Urban Land Use (Health Impacts)

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3971384/>

Cardiovascular effects of environmental noise exposure

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6068638/>

A Multilevel Analysis of Perceived Noise Pollution

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3988259/>

Auditory and non-auditory effects of noise on health

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4608916/>

Environmental noise and sleep disturbances: A threat to health

<https://pubmed.ncbi.nlm.nih.gov/23684342/>

Effect of nocturnal road traffic noise exposure and annoyance on objective and subjective sleep quality

MN106-12

**excess crime (BCHD periodically has un-housed living on the Flagler side),**

<https://spectrumnews1.com/ca/la-west/news/2019/05/07/crime-among-the-homeless-explodes-in-los-angeles>

Crime Rate Among Homeless Skyrockets in Los Angeles

<https://popcenter.asu.edu/content/homeless-encampments-0>

The Problem of Homeless Encampments

<https://xtown.la/2020/06/23/homeless-crime-los-angeles/>

The number of homeless crime victims and suspects outpaces rise in homeless population

**excess crime (BCHD Flagler alley is frequented by the un-housed and transients),**

<https://spectrumnews1.com/ca/la-west/news/2019/05/07/crime-among-the-homeless-explodes-in-los-angeles>

Crime Rate Among Homeless Skyrockets in Los Angeles

<https://popcenter.asu.edu/content/homeless-encampments-0>

The Problem of Homeless Encampments

<https://xtown.la/2020/06/23/homeless-crime-los-angeles/>

The number of homeless crime victims and suspects outpaces rise in homeless population

**excess fugitive dust and emissions from construction,**

<https://www3.epa.gov/ttn/chief/ap42/ch13/final/c13s02.pdf>

Fugitive Dust Sources

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5920433/>

Function of PM2.5 in the pathogenesis of lung cancer and chronic airway inflammatory diseases

MN106-13 <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6157824/>

Outdoor particulate matter (PM10) exposure and lung cancer risk in the EAGLE study

<https://pubmed.ncbi.nlm.nih.gov/15668476/>

Breast cancer risk and exposure in early life to polycyclic aromatic hydrocarbons using total suspended particulates as a proxy measure

**excess noise from construction,**

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4608916/>

Environmental noise and sleep disturbances: A threat to health

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6068638/>

A Multilevel Analysis of Perceived Noise Pollution

MN106-14 <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3988259/>

Auditory and non-auditory effects of noise on health

<https://pubmed.ncbi.nlm.nih.gov/23684342/>

Effect of nocturnal road traffic noise exposure and annoyance on objective and subjective sleep quality

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3162363/>

Environmental Stressors: The Mental Health Impacts of Living Near Industrial Activity

**excess asbestos risk from construction,**

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4202766/>

Asbestos Exposure among Construction Workers During Demolition

<https://www.sokolovelaw.com/blog/buildings-demolished-without-asbestos-abatement/>

Can Buildings Be Demolished Safely Without Asbestos Abatement?

<https://www.epa.gov/sites/production/files/2016-07/documents/453-b-16-002a.pdf>

Guidelines for Enhanced Management of Asbestos in Water at Ordered Demolitions

MN106-15 [https://www.epa.gov/sites/production/files/2017-06/documents/asbestos\\_scope\\_06-22-17.pdf](https://www.epa.gov/sites/production/files/2017-06/documents/asbestos_scope_06-22-17.pdf)

Scope of Risk Evaluation

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5036735/>

GHG and Asbestos

[https://www.niehs.nih.gov/health/assets/docs\\_f\\_o/homeowners\\_and\\_renters\\_guide\\_to\\_asbestos\\_cleanup\\_after\\_disasters\\_508.pdf](https://www.niehs.nih.gov/health/assets/docs_f_o/homeowners_and_renters_guide_to_asbestos_cleanup_after_disasters_508.pdf)

Homeowners guide to asbestos cleanup

**excess water runoff (construction and operations),**

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5954058/>

Evaluation of the impact of construction products on the environment by leaching of possibly hazardous substances

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1448005/>

MN106-16 Public Health Effects of Inadequately Managed Stormwater Runoff

<https://pubmed.ncbi.nlm.nih.gov/21902038/>

Leaching of additives from construction materials to urban storm water runoff

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4149883/>

Storm water contamination

MN106-16 (cont.) <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1862721/>  
The challenge posed to children's health by mixtures of toxic waste

**reduced visual privacy,**  
<https://www.aia.org/pages/22356-designing-for-invisible-injuries-an-explorat?tools=true>  
MN106-17 Designing for Invisible Injuries  
<https://bridgehousing.com/PDFs/TICB.Paper5.14.pdf>  
Trauma Informed Community Building

**increased cardiovascular risk in surrounding area from noise,**  
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3971384/>  
Cardiovascular effects of environmental noise exposure  
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5898791/>  
MN106-18 The Adverse Effects of Environmental Noise Exposure on Oxidative Stress and Cardiovascular Risk  
<https://ehp.niehs.nih.gov/doi/pdf/10.1289/ehp.00108s1123>  
Noise Exposure and Public Health  
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6078840/>  
The acute effect of exposure to noise on cardiovascular parameters in young adults

**increased chronic stress (Bluezone's "silent killer")**  
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6125071/>  
Dan Buettner - Blue Zones Lessons From the World's Longest Lived  
"Stress leads to chronic inflammation, associated with every major age-related disease"  
<https://www.bluezones.com/2019/05/how-stress-makes-us-sick-and-affects-immunity-inflammation-digestion/>  
How Stress Makes Us Sick  
<https://www.bluezones.com/2012/03/maximize-health-and-longevity-using-these-stress-management-strategies/>  
Stress Management Strategies  
<https://www.bluezones.com/2018/01/20-habits-healthier-happier-life/>  
MN106-19 Avoid Chronic Stress  
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1568850/> Noise and Stress: A comprehensive approach  
impaired cognitive function/  
Noise and Stress: A comprehensive approach  
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3162363/>  
Environmental Stressors: The Mental Health Impacts of Living Near Industrial Activity  
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2535640/>  
Traffic-related Air Pollution and Chronic Stress: Effects on Asthma  
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3222511/>  
Critical Biological Pathways for Chronic Psychosocial Stress

## SUMMARY

For 60 years, BCHD and SBHD have damaged the surrounding neighborhoods. Now that South Bay Hospital has failed and no emergency hospital is available, BCHD has severed SBHDs social compact with the voting public that provided a limited quid pro quo for its environmental and economic justice damages. BCHD was never voter approved.

MN106-20 The list above is non-exhaustive, but represents significant public health, environmental and economic justice damages, and negative externalities that BCHD must examine and mitigate as part of its EIR. Further, the list above must be examined and mitigated in order to demonstrate that the City of Redondo Beach and explicitly South Redondo Beach 90277 receive no further damages and are benefitted from BCHDs proposed project or a Conditional Use Permit must be rejected and a public vote taken on the over-development plan.

Mark Nelson

[menelson@gmail.com](mailto:menelson@gmail.com)

Redondo Beach Property Owner

3+ Year Volunteer BCHD Community Working Group

Expert Witness

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:38 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: PUBLIC Comment on BCHDs Defective DEIR

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Tuesday, June 8, 2021 11:46 AM  
**To:** EIR <eir@bchd.org>; Communications <Communications@bchd.org>; CityClerk <CityClerk@torranceca.gov>; Eleanor Manzano <cityclerk@redondo.org>; Brandy Forbes <brandy.forbes@redondo.org>  
**Cc:** superintendent@tUSD.org <superintendent@tUSD.org>; han.james@tUSD.org <han.james@tUSD.org>; Steven Keller <skeller@rbusd.org>; Paul Novak <pnovak@lalafco.org>; torranceptas <torranceptas@gmail.com>; rbpta <rbpta@rbusd.org>; rflinn@rbusd.org <rflinn@rbusd.org>  
**Subject:** PUBLIC Comment on BCHDs Defective DEIR

Public Comment to BCHD Board, Redondo Beach and Torrance Mayors and Councils, Redondo Beach Planning Commission  
EIR Comment to BCHD

In *Sierra Club v. County of Fresno* (2018) 2018 Cal.LEXIS 9831, the California Supreme Court 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.

MN107-1

Not only has the BCHD DEIR failed to "substantively connect" the Project's air quality impacts to likely health consequences, but the DEIR fails to "substantively connect" ANY impacts to likely health consequences. Absent that connection, the public is unable to "consider meaningfully" the issues of the Project as determined by the California Supreme Court in the case above.

MN107-2

This is particularly troubling given 1) BCHDs status as a health district, 2) BCHDs published mission of "to enhance community health", not further harm health, and 3) CEO Bakaly's moral obligation standard that states "health district ... has a moral obligation ... to protect ... the community." Furthermore, it is troubling given BCHDs CPRA responses acknowledging that it failed to evaluate its claimed 40+ programs for cost-effectiveness at the program level, the Blue Zones company's refusal to provide any documentation of analysis for the BCHD service area, and LA County Department of Public Health's comments on BCHDs LiveWell Kids program that it failed to have a program evaluation and BCHD failed to have even the most basic "control group", rendering evaluation impossible.

MN107-3

Thus, BCHD presents a defective DEIR that has not correlated its proposed environmental damages with likely health consequences. Further, BCHD EIR project schedule includes a statement of overriding consideration as part of its self-certification, and it's clear from CPRA responses that BCHD has no valid assessment of its benefits to compare to its proposed health damages. At an absolute legal minimum, BCHD must be required to substantively connect the project's environmental impacts with likely negative health impacts in order to have meaningful, intelligent public participation.

MN107-4

As the agency responsible in CEQA for protection of the residents of Redondo Beach, it is incumbent on the City of Redondo Beach to provide strong comments to BCHD to ensure their compliance with the letter and intent of the

California Supreme Court ruling. Clearly, since BCHD determined that health impacts were insufficiently important to include in the DEIR, it has also determined that it will certify a defective EIR. That is unacceptable to the residents of the community and counter to the California Supreme Court decision above.

The City of Torrance, and the school districts also have obligations to comment on these damages to their students, and all have previously received detailed comments on the unanalyzed BCHD project damages to health.

By way of this comment, both the Responsible and Lead Agencies have been notified that BCHD DEIR is defective, must be remediated, and recirculated to comply with the 2018 Decision. The City of Torrance and the TUSD and RBUSD have also been notified.

This is not a request for extraordinary action, it is a notice that the BCHD DEIR is not in compliance with the California Supreme Court Decision above, nor with BCHD's mission or the CEOs Moral Obligation standard established for BCHD.

Specific Negative Environmental Impacts Requiring Correlation to Health Impacts

Reduction of Blue Sky View and Sunlight, Increase in Shadowing/Shading - Correlated to Physical and Mental Health

Significant Construction Noise - Correlated to Physical and Mental Health

Significant Intermittent Noise - Correlated to Physical and Mental Health, ADA Violations for Student IEP and 504 Plans at Towers Elementary

Vibration - Correlated to Physical and Mental Health

Incremental Air Emissions - Correlated to Physical and Mental Health (especially children, the elderly, and disabled)

Reduced Recreation at Towers Elementary Fields - Correlated to Physical and Mental Health (especially children)

cc: Public Comment TUSD Board and Superintendent, RBUSD Board and Superintendent, LALAFCO, Torrance and Redondo Beach PTAs

Mark Nelson  
Redondo Beach  
3+ Year Volunteer BCHD Community Working Group



## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:40 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHDs Proposed Overdevelopment is Inconsistent with More Current P-CF Zoned Development  
**Attachments:** Required Approvals - BCHD Proposal Inconsistent with current P-CF development.pdf

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Tuesday, June 8, 2021 10:55 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Fwd: BCHDs Proposed Overdevelopment is Inconsistent with More Current P-CF Zoned Development

DEIR Comment to BCHD defective DEIR

----- Forwarded message -----

**From:** Mark Nelson (Home Gmail) <[menelson@gmail.com](mailto:menelson@gmail.com)>  
**Date:** Mon, Jun 7, 2021 at 3:32 PM  
**Subject:** BCHDs Proposed Overdevelopment is Inconsistent with More Current P-CF Zoned Development  
**To:** Eleanor Manzano <[cityclerk@redondo.org](mailto:cityclerk@redondo.org)>, Brandy Forbes <[brandy.forbes@redondo.org](mailto:brandy.forbes@redondo.org)>  
**Cc:** <[zein.obagi@redondo.org](mailto:zein.obagi@redondo.org)>, Christian Anthony Horvath <[horvath.rbd3@gmail.com](mailto:horvath.rbd3@gmail.com)>, <[todd.loewenstein@redondo.org](mailto:todd.loewenstein@redondo.org)>, Nils Nehrenheim <[nils.nehrenheim@redondo.org](mailto:nils.nehrenheim@redondo.org)>, Laura Emdee <[laura.emdee@redondo.org](mailto:laura.emdee@redondo.org)>, Christian Horvath – Redondo Beach District 3 Council Member <[christian.horvath@redondo.org](mailto:christian.horvath@redondo.org)>, Bill Brand <[bill.brand@redondo.org](mailto:bill.brand@redondo.org)>

### PUBLIC COMMENT

Dear Mayor, Council and Commission:

The attached PDF shows all 7 P-CF parcels in the City of Redondo Beach and demonstrates how they conform to a consistency requirement of the local neighborhoods. The proposed BCHD is well outside 2 standard deviations of the local neighborhoods in both height and size.

Please include comments in the DEIR demonstrating the City's concern regarding the BCHD project's lack of conformance with required approvals.

## BCHDs Proposed Overdevelopment is Inconsistent with More Current P-CF Zoned Development

From: Mark Nelson  
Redondo Beach Property Owner  
3+ Year BCHD Volunteer, Community Working Group

Based on information from the City of Redondo Beach, there are seven (7) P-CF parcels in Redondo Beach. They are:

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

With the exception of BCHD, the former South Bay Hospital parcel and the City of Redondo Beach multiple use facility, the remaining five (5) P-CF parcel uses appear to be consistent with surrounding land uses from a design, height, and traffic perspective. Both the current BCHD and the 103-foot tall, 800,000 sqft proposed overdevelopment are inconsistent with more current, allowed P-CF development.

MN108-1  
(cont.)

### Andrews Park

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

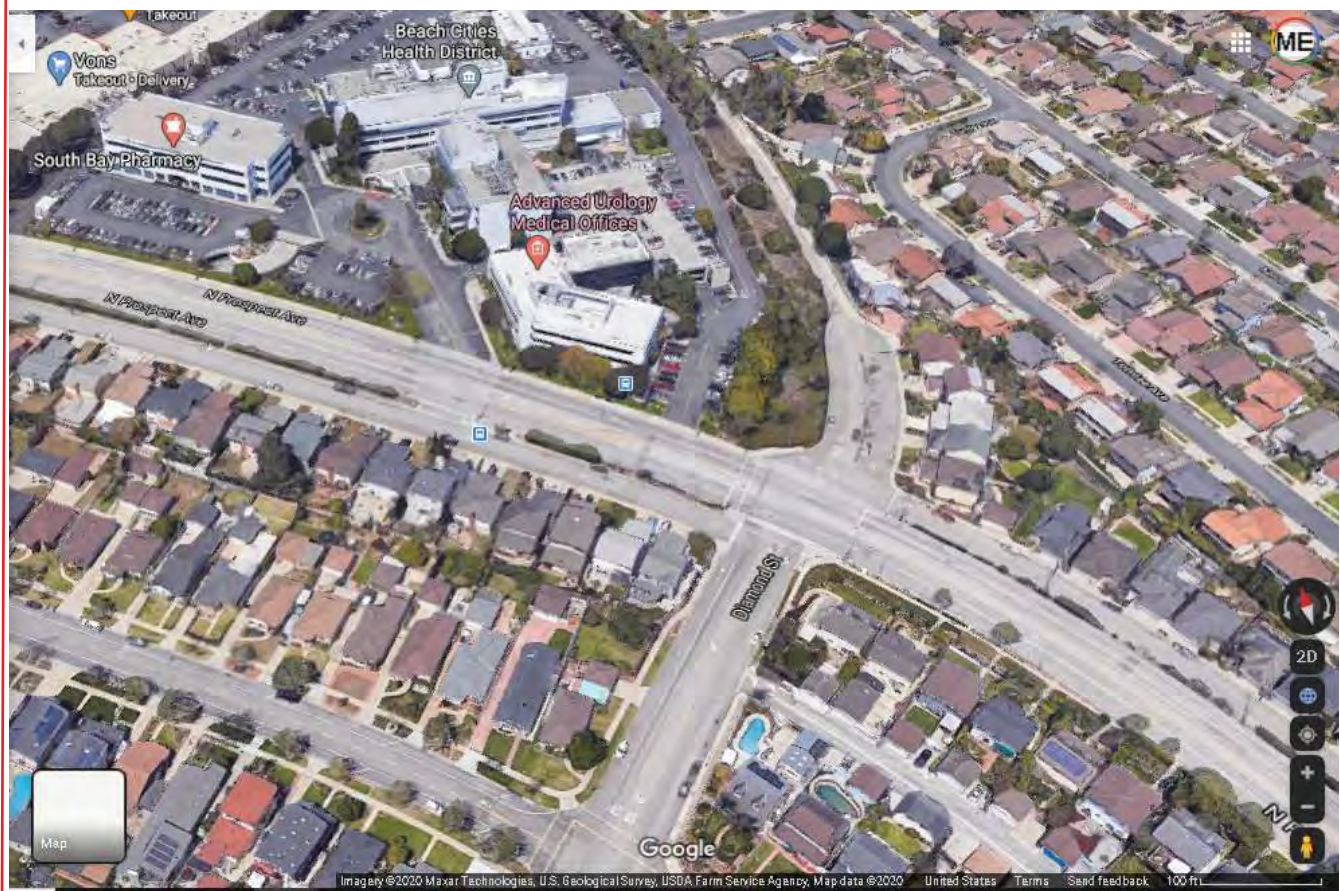




### Beach Cities Health District (BCHD)

BCHD was renamed from South Bay Hospital District (SBHD) in 1993 following the 1984 failure of South Bay Hospital as a publicly-owned emergency hospital, and the subsequent failure as a leased facility to AMI/Tenet. Per Google Earth Pro (GEP) measurements, the hospital towers are generally 4-story, 60-feet tall. Per BCHD, there is a single, 968-sqft “penthouse” mechanical room atop the 514 N. Prospect hospital building at 75-feet. That represents 0.3% of the approximately 300,000-sqft of the existing campus buildings. At 75-feet, BCHD is 250% the height of surrounding 30-foot height zoning limits. SBHD also allowed construction of two (2) medical office buildings on land it leased to third (3rd) parties. These buildings are both 3-stories and 40-feet, also according to GEP measurements. They are both 130% of local zoning height restrictions and the 510 N. Prospect building is built at the west-most lot line, increasing its mass, noise reflection, and visual height to a maximum for its construction. At 130% to 250% in excess of surrounding zoning height limits, with concrete sound-reflective walls, substantial reflective glass, night time outdoor lighting, traffic, and emergency siren activity, BCHD is not consistent with the surrounding neighborhoods in function nor design.

MN108-1  
(cont.)



### Broadway Fire Station (#1)

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



MN108-1  
(cont.)

### City of Redondo Beach Facility (Beryl St)

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

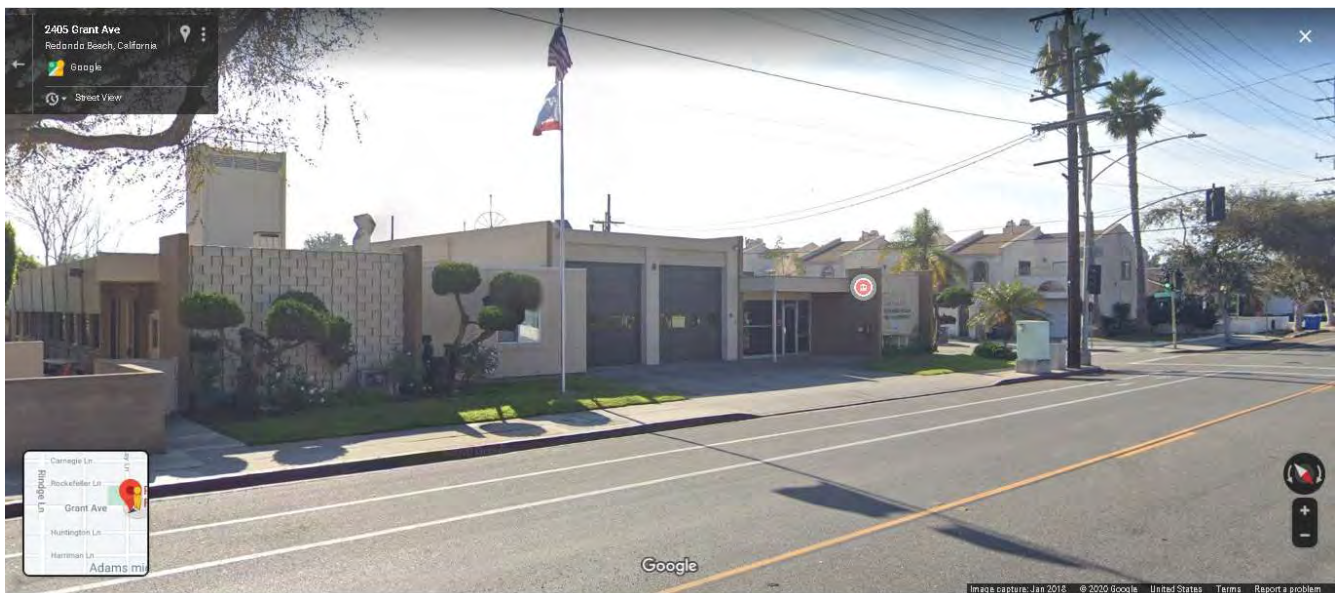




### Grant Fire Station (#2)

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

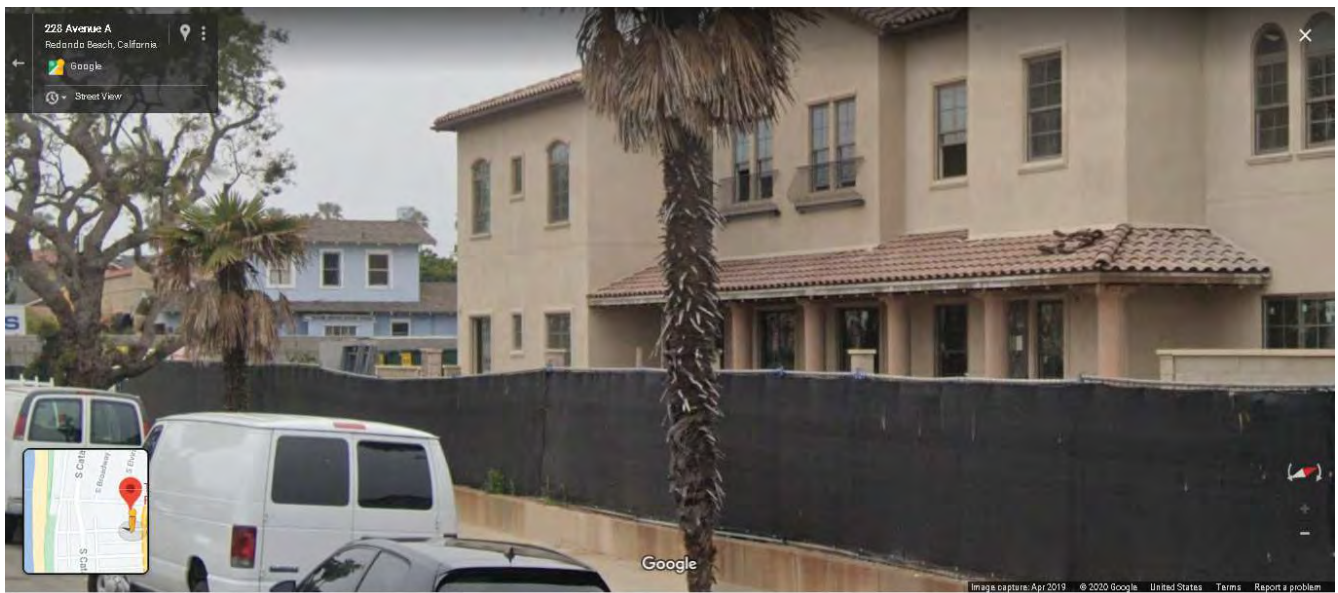
MN108-1  
(cont.)



### Kensington Assisted Living

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





### North Branch Library

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

MN108-1  
(cont.)



### Conclusion

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

MN108-1 (cont.) time lighting, traffic, sirens, and associated PM2.5 emissions are inconsistent with surrounding land uses, notwithstanding any CEQA self-certification by BCHD.

MN108-2 Further, BCHD had developed a moral obligation to protect the community standard that is more stringent than laws and ordinances. This moral obligation standard was used by BCHD to justify seismic retrofit or demolition of the 514 hospital building. Consistent application of the standard to the surrounding neighborhoods, 60+ years of economic and environmental injustice by SBHD and BCHD, and a proposed 50-100 years more of economic and environmental injustice renders this overdevelopment unbuildable.

MN108-3 Last, the current BCHD has only 0.3% of its campus sqft at 75-feet tall. The 514 building is on average just slightly over 30-feet tall, and as such, that average height should serve as the average height cap to any future site development under a CUP for P-CF zoning.

#### Redondo Beach Code Conformance

The current BCHD at 312,000 sqft does not appear to conform with existing Redondo Beach code for issuance of a Conditional Use Permit. The proposed 793,000 sqft, 103-feet tall, 6-story senior apartments and 10-1/2 story, car parking structure violate the following RBMC section based on height, noise, invasion of privacy, and excess generated traffic. In addition, the proposed BCHD overdevelopment is inconsistent with design guidelines for Beryl Heights.

#### 10-2.2506 Conditional Use Permits.

MN108-4 (a) Purpose. The purpose of a Conditional Use Permit shall be to review certain uses possessing unique characteristics, as listed in Article 2 of this chapter, to **insure that the establishment or significant alteration of those uses will not adversely affect surrounding uses and properties** nor disrupt the orderly development of the community. The review shall be for the further purpose of stipulating such conditions regulating those uses to assure that the criteria of this section shall be met.

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

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

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

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



## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:41 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: DEIR Comments

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Wednesday, June 9, 2021 12:10 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** DEIR Comments

MN109-1 Phase 2 is ill defined. The Master Plan is not part of the DEIR. The BCHD DEIR is defective, must be remediated, and recirculated.

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:41 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Comment - Non-compliance with Redondo Beach Codes

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Wednesday, June 9, 2021 11:49 AM  
**To:** EIR <eir@bchd.org>  
**Subject:** Comment - Non-compliance with Redondo Beach Codes

BCHDs DEIR is defective, must be remediated and recirculated.

MN110-1

BCHDs DEIR fails to provide any alternatives for the C-2 Flagler lot that conform with the building requirements and limitations of the City of Redondo Beach. Therefore, the DEIR is defective.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:41 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Comment

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Wednesday, June 9, 2021 11:53 AM  
**To:** EIR <eir@bchd.org>  
**Subject:** Comment

MN111-1 | BCHD must conduct an EIR amendment for Phase 2. Phase 2 is ill-defined and cannot be understood intelligently by the public. The DEIR is defective, must be remediated and recirculated.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:52 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: eComment for 6/8 Meeting

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, June 10, 2021 12:22 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Fwd: eComment for 6/8 Meeting

Comment to DEIR.

----- Forwarded message -----

**From:** Mark Nelson (Home Gmail) <[menelson@gmail.com](mailto:menelson@gmail.com)>  
**Date:** Tue, Jun 8, 2021 at 4:30 PM  
**Subject:** eComment for 6/8 Meeting  
**To:** Bill Brand <[bill.brand@redondo.org](mailto:bill.brand@redondo.org)>, <[todd.loewenstein@redondo.org](mailto:todd.loewenstein@redondo.org)>, <[zein.obagi@redondo.org](mailto:zein.obagi@redondo.org)>, Nils Nehrenheim <[nils.nehrenheim@redondo.org](mailto:nils.nehrenheim@redondo.org)>, Christian Horvath – Redondo Beach District 3 Council Member <[christian.horvath@redondo.org](mailto:christian.horvath@redondo.org)>, Christian Anthony Horvath <[horvath.rbd3@gmail.com](mailto:horvath.rbd3@gmail.com)>, Laura Emdee <[laura.emdee@redondo.org](mailto:laura.emdee@redondo.org)>

Dear Mayor and Council:

Due to working remotely by cell modem, I cannot see if my eComment properly posted. My intent was to comment using that method, however, I am providing that comment to you as a duplicate as well, since gmail seems to be performing for me. Thank you.

POSTED BY eCOMMENT (hopefully)

BCHD's DEIR is defective and should be revised and recirculated, and I ask that be included in the City's comments to the DEIR.

In 2018, the California Supreme Court 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.

(1) BCHD's DEIR fails to provide sufficient detail of the negative health impacts and negative environmental impacts of its Project. BCHD elected to exclude analysis of Recreation impacts ex ante, despite comments in the NOP phase requesting Recreation impacts be examined. Public review of the DEIR ferreted out the impacts of shadowing/shading on the public recreation fields of Towers Elementary, thereby negatively impacting public recreation. BCHD neither examined Recreation nor discussed the impacts. As a result of this omission and a general lack of detail on negative health impacts, the public, and the City of Redondo Beach, have insufficient information and analysis from BCHD to meaningfully consider the Project's impacts.

MN112-2  
(cont.)

(2) Further, BCHD has not connected the project's negative impacts with health impacts as per the Court's direction. BCHDs incremental emissions, denial of sunlight to residential and recreational uses, noise, vibration, glare, excess night time lighting and other negative impacts have no discussion of their myriad negative health impacts. BCHD also fails to discuss the specific health impacts of their proposed mitigations. As a result, intelligent participation in the CEQA process is denied to the public.

Again, the DEIR is defective, should be revised and recirculated.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:53 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD: Public Record Requests

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, June 10, 2021 2:37 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Fwd: BCHD: Public Record Requests

The following demonstrates that BCHD deliberately timed their choice of June 2020 project approval and March 2021 DEIR under cover of Covid to minimize public input, meetings, gatherings, and public organizing.

BCHD DEIR is therefore defective.

----- Forwarded message -----

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Date:** Mon, Jun 7, 2021 at 6:26 PM  
**Subject:** Re: BCHD: Public Record Requests  
**To:** PRR <PRR@bchd.org>

BCHD and only BCHD elected to pursue a roughly one-half billion dollar project under cover of Covid. BCHD was fully aware of its CPRA obligations and also the impacts of Covid on its operations when it pursued development beginning with the June 2020 Board approval. BCHD is derelict, negligent and malfeasant in failing to prepare for continued levels of CPRA request processing. According to BCHD's own table in the May Board documents, BCHD has outstanding CPRA responses back to June of 2020. BCHD has bungled its State obligation to CPRA and is actively thwarting intelligent public participation in the CEQA process as the lead agency.

On Mon, Jun 7, 2021 at 5:44 PM PRR <PRR@bchd.org> wrote:

Mark,

Between April 29<sup>th</sup> 2021 and June 7<sup>th</sup> 2021, the District received 25 new emails from you containing approximately 47 new requests. **This communication serves as the District's initial 10-day response as required by the PRA for requests received since 5/26/21.**

After reviewing your requests, the District has determined that your numerous requests for public documents imposes an excessive burden on the District's limited staff and resources, thereby disrupting its ability to provide due attention to its primary government functions. Several of your most recent requests are overly extensive, over-broad, vague, and in many cases unlimited in time and scope. Many of the requests are not limited to a certain file or project. Your new requests continue to increase the burden on the District which will necessarily have the impact of further delaying the District's responses.

Over the course of the 15+ months, the District has received and responded in good faith to your numerous public record requests, but the volume, scope and frequency of your requests continue to increase. Since 1/1/20, you have submitted approximately 259 emails containing approximately

522 additional requests/questions on a multiplicity of separate and unrelated topics. Despite the cumulative impact of your limitless and increasing requests imposing an undue burden on the District, we continue to respond to your requests. Since 2019, we have answered approximately 392 requests and 144 remain open. The District'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.

As you know, the District is a small public agency with a relatively small staff. It is operating under emergency protocols due to the COVID -19 crisis. **The District is currently focused on the continued rollout of COVID-19 vaccines.** In light of these special circumstances and the massive scope of your requests over time, the District has determined that it does not have a legal duty to produce the records sought in your most recent requests. This determination is based upon 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. Additional exemptions or privileges may apply based on a review of the records.

Despite this determination and without waiving any privileges, exemptions, or objections to your public record requests, the District will, in its discretion and not as a legal obligation, endeavor to produce responsive non-exempt documents as they can be reasonably identified from your requests within the reasonable capabilities of our staff. The District is willing to work with you to narrow the scope of your overly broad requests so that the search can be focused on documents that are identifiable and can be produced with reasonable effort. This will inevitably take an extended period of time and therefore we cannot set precise dates for completion of this process. The timing and willingness of the District to produce any more documents notwithstanding the undue burden you have imposed on the District will also depend in large part on your willingness to cooperate in limiting and clarifying your requests. The District reserves all rights to cease any further production of documents for the reasons stated herein at any time.

At present, we intend to provide responsive documents for the emails sent between 5/26/20 - 6/7/21 on a **rolling basis** as they are identified. We anticipate that the first documents (for the requests that remain open) will be available by June 30<sup>th</sup>, 2021 **and in some cases, responses have already been provided.**

**As a reminder:** For all comments related to the **DEIR**, please send to [EIR@bchd.org](mailto:EIR@bchd.org).

Thank you.



## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:52 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Comment - Child Health Damages Caused by BCHD Proposed Project  
**Attachments:** BCHD Child Emissions Damages.pdf

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, June 10, 2021 12:23 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Comment - Child Health Damages Caused by BCHD Proposed Project

In 2018, the California Supreme Court 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.

BCHD DEIR is defective, must be remediated, and recirculated. The DEIR failed to analyze the many health impacts on children as delineated in the attachment.

## **BCHD 5+ Years of Construction Emissions Will Impact Child Health**

BCHD predicts 10,000 heavy construction vehicles will spew particulates from their tailpipes and from their demolition debris during 5 years of construction. Particulate matter, especially PM2.5, is very damaging to the health of children. Recent peer reviewed studies cite the health damages to include asthma, developmental delays, early onset Alzheimer's, Parkinson's and memory loss. As a health district, BCHD has a moral obligation to protect our children from the damages of its construction project and ongoing operations. BCHD must not add to the air emissions and particulates in surrounding neighborhoods and schools with its unneeded project.

The following peer-reviewed studies filed with the US National Institutes of Health clearly demonstrate the damages that BCHD will do to our children, and also the damages that BCHD ignored in their DEIR from their 10,000 heavy truck trips and associated exhaust and particulate matter.

## **A Sampling of Peer Reviewed Journal Articles of BCHD Damages to Children**

### **ASTHMA/LUNG DAMAGES**

<https://pubmed.ncbi.nlm.nih.gov/18629323/>

Chronic traffic-related air pollution and stress interact to predict biologic and clinical outcomes in asthma

MN114-1  
(cont.)

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2535640/>

Traffic-Related Air Pollution and Stress: Effects on Asthma

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5920433/>

Function of PM2.5 in the pathogenesis of lung cancer and chronic airway inflammatory diseases

### **BRAIN & MENTAL DAMAGES**

<https://pubmed.ncbi.nlm.nih.gov/23509683/>

Early Alzheimer's and Parkinson's disease pathology in urban children: Friend versus Foe responses--it is time to face the evidence

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4129915/>

Air pollution and detrimental effects on children's brain. The need for a multidisciplinary approach to the issue complexity and challenges

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5559575/>

Psychological Impact of Vehicle Exhaust Exposure

<https://pubmed.ncbi.nlm.nih.gov/29936225/>

Chronic traffic noise stress accelerates brain impairment and cognitive decline

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7503511/>

Traffic Noise and Mental Health: A Systematic Review and Meta-Analysis

### **CANCER DAMAGES**

<https://pubmed.ncbi.nlm.nih.gov/15668476/>

Breast cancer risk and exposure in early life to polycyclic aromatic hydrocarbons using total suspended

particulates as a proxy measure

### **CHRONIC STRESS/BLUE ZONES “SILENT KILLER” DAMAGES**

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5573220/>

Neurobiological and Systemic Effects of Chronic Stress

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5579396/>

The Impact of Stress on Body Function

critical evaluation of the evidence

### **GENERAL HEALTH DAMAGES**

<https://ehp.niehs.nih.gov/doi/10.1289/ehp299>

Multiple Threats to Child Health from Fossil Fuel Combustion: Impacts of Air Pollution

### **HEART DAMAGES**

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2844969/>

Cardiovascular health and particulate vehicular emissions

MN114-1  
(cont.)

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:54 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD DEIR Comments  
**Attachments:** BCHD Damages Photo Video.pdf

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---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, June 10, 2021 3:10 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** BCHD DEIR Comments

MN115-1 | See attached DEIR comments regarding BCHD damages that were insufficiently analyzed and discussed in the DEIR.

## **Public DEIR Comment 6/10/21**

**As a result of assertions by BCHD that traffic on Prospect would be reduced by its project, a blatantly false statement given that BCHD proposes a 10-1/2 story parking ramp accessed from Prospect at Diamond, extensive traffic monitoring video equipment was installed across from BCHD on Prospect frontage.**

**The following CEQA damage comments are provided below and reinforced with photos and videos:**



**TRAFFIC IMPACTS: BCHD USE OF ADJACENT PROSPECT FRONTAGE** - Access Paratransit repeatedly chooses to drive the wrong way down the Prospect frontage and block driveways to load/unload BCHD complex clients/patients rather than engage in the dysfunctional traffic environment of BCHD. BCHD, like SBHD before it, impinges on Prospect frontage.

Sat, May 2, 2020



**TRAFFIC IMPACTS: WRONG WAY TRAFFIC PROSPECT FRONTAGE** – Due to congestion at BCHD Prospect entrance (absent the proposed 10-1/2 story parking tower) is sufficient to drive repeated wrong way traffic down the BCHD adjacent frontage road.





**TRAFFIC IMPACTS: BCHD USE OF ADJACENT PROSPECT FRONTAGE** - Access Paratransit blocks driveways on Prospect frontage to load/unload BCHD complex clients/patients rather than engage in the dysfunctional traffic environment of BCHD. BCHD, like SBHD before it, impinges on Prospect frontage.

Sun, Jan 5, 2020



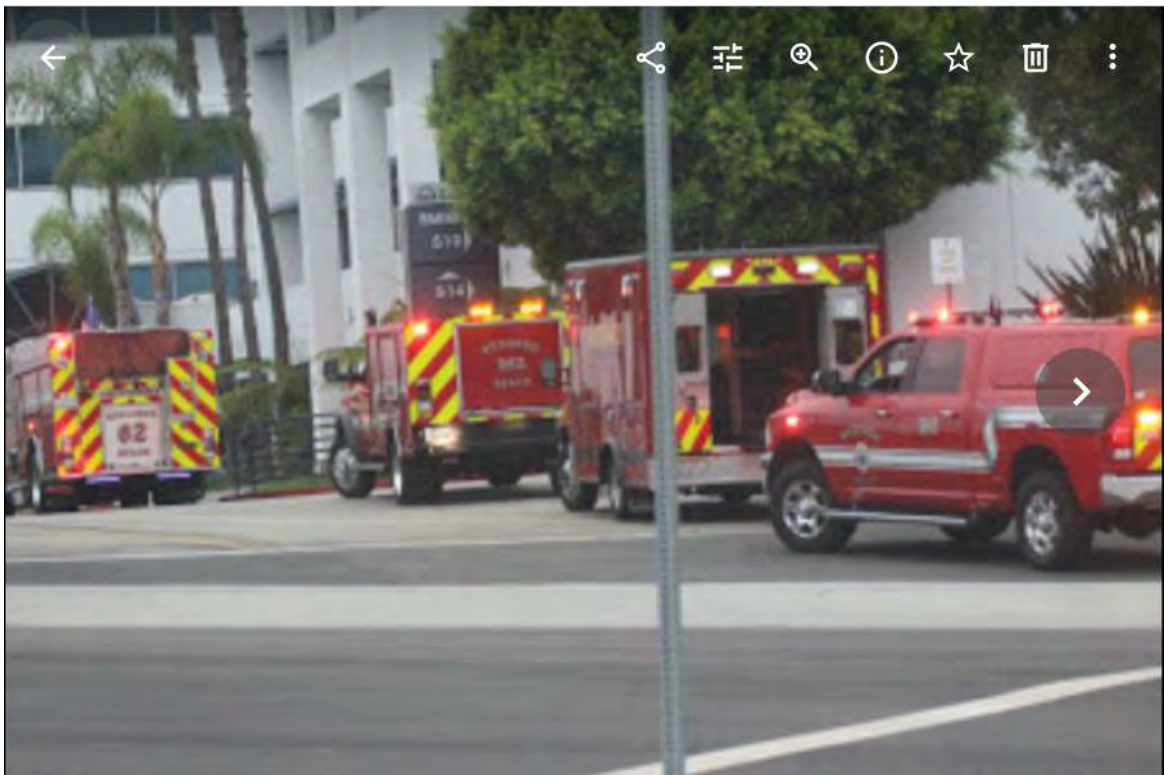
**TRAFFIC IMPACTS: WRONG WAY TRAFFIC PROSPECT FRONTAGE** – Due to congestion at BCHD Prospect entrance (absent the proposed 10-1/2 story parking tower) is sufficient to drive repeated wrong way traffic down the BCHD adjacent frontage road.





MN115-1  
(cont.)

**TRAFFIC IMPACTS: BCHD IMPACT ON PROSPECT – 12/22/20** BCHD plans to install a 10-story, 800-1000 car garage at the first entrance northbound to BCHD on Prospect. This long line of disruptive traffic blocking emergency access to Diamond culdesac is from a BCHD event using that entrance.



MN115-2

**ENVIRONMENTAL INJUSTICE: BCHD CHRONIC STRESS ON SURROUNDING NEIGHBORS –** BCHD and SBHD have subjected surrounding neighborhoods to Blue Zones “Silent Killer” chronic stress for over 60 years.

### Under cover of COVID by Bob Pinzler

Over the past four months, the relationship of the public to their local governments has moved from the City Council podium and public meetings to ZOOM calls. In that process, very important decisions are being made without the benefit of proper levels of public input.

One specific case in the Beach Cities is the Health District's plan to build a six-story, assisted living tower and an eight-story garage to serve it and the offices they rent out. Public sentiment expressed at meeting after meeting led the District to revisit their original proposal and alter it to some extent.

But the absence of promised new public meetings and the difficulty of presenting dissenting opinions in ZOOM meetings have given the BCHD the cover to move along a still very objectionable proposal.

The District has made clear the potential financial issues they would have to face should this project not get approved. Yet, most of those problems develop for them in the far distant future. Nothing stands in the way of the District putting this project on hold until a reasonably regular order can be reestablished where in-person meetings can be held.

Their recent decision to proceed with a draft environmental impact report (DEIR) on this new project, which would, as they said, "help answer the questions the public might have," does-

n't truly state the case. With the BCHD as the lead agency on the DEIR, they get to decide which elements of the report they are required to respond to. They could easily simply announce that any mitigation needed is resolved, without necessarily proving that it is.

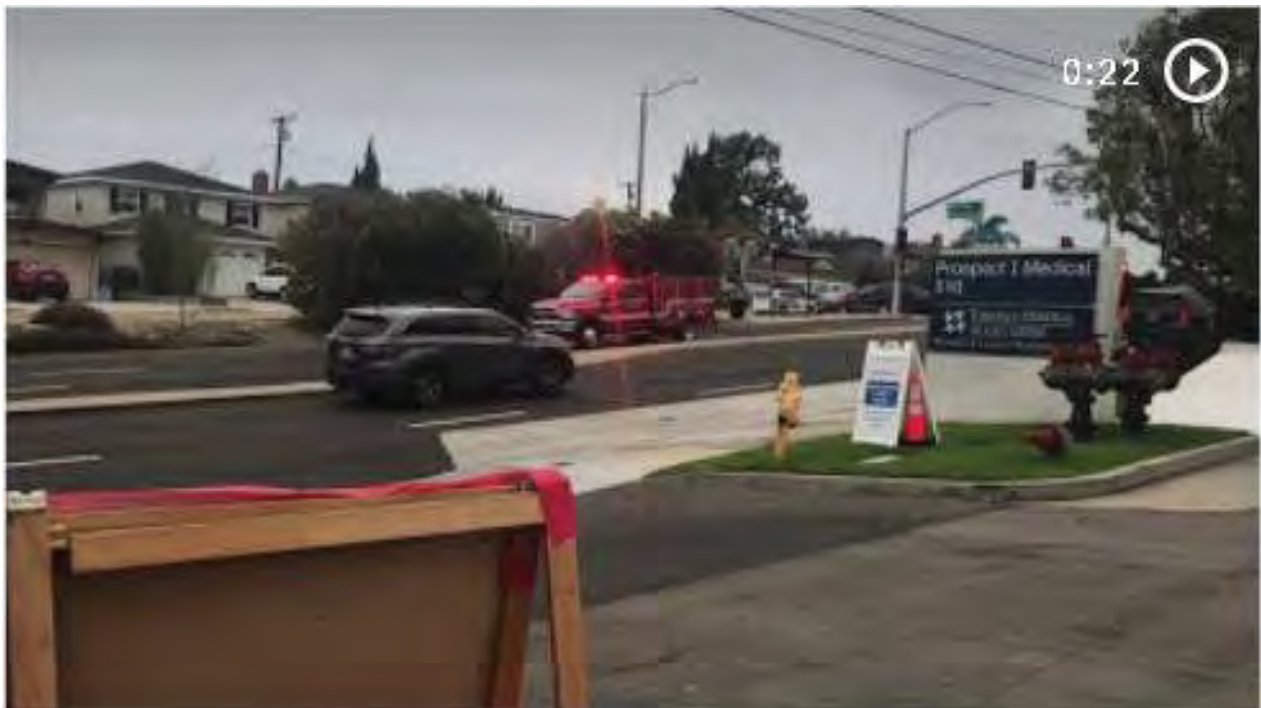
The only two potential roadblocks to this process would then be the Redondo Beach Planning Commission, which would have to provide conditional use permits for the two separate zones in which the new building would be located. Note that the existing CUPs on the property are specifically designed for the "514 building," which is the centerpiece of the District's failure to manage their property properly. They are not transferable to the proposed concept.

Should the Planning Commission grant the CUPs, an appeal to the City Council would be in order. However, appeals are rarely successful.

The central question is why the BCHD is in such a hurry to move this project along in the semi-darkness of COVID. It can easily wait until our focus can return from the pandemic to whether or not this District's self-inflicted wounds need to be solved by selling out to a majority investor whose goal will be profit from non-Beach Cities residents over service to the seniors of our community.

BCHD is a public agency. They should take every opportunity to hear from the public they serve. Hiding behind COVID is cowardice. **B**

**CEQA PROCESS FAILURE: BCHD DELIBERATE CHOICE TO REDUCE PUBLIC PARTICIPATION** As recognized by Councilmember Pinzler of Redondo Beach, BCHD deliberately minimized public participation, antithetical to CEQA, by operating under cover of Covid,



**ENVIRONMENTAL INJUSTICE: BCHD CHRONIC STRESS ON SURROUNDING NEIGHBORS** – BCHD and SBHD have subjected surrounding neighborhoods to Blue Zones “Silent Killer” chronic stress for over 60 years. Video sequence with lights and sirens impacting Silverado and surrounding neighbors with peer-reviewed stress captured from the perspective of Silverado.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:55 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD must recuse itself as lead agency on the HLC

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, June 10, 2021 3:14 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Fwd: BCHD must recuse itself as lead agency on the HLC

DEIR Comment

----- Forwarded message -----

**From:** Mark Nelson (Home Gmail) <[menelson@gmail.com](mailto:menelson@gmail.com)>  
**Date:** Tue, Jan 21, 2020 at 6:55 PM  
**Subject:** BCHD must recuse itself as lead agency on the HLC  
**To:** Cristan Higa <[cristan.higa@bchd.org](mailto:cristan.higa@bchd.org)>, EIR <[eir@bchd.org](mailto:eir@bchd.org)>

To: BCHD Board of Directors

Following discussions and data requests with the Governor's Office and City of Redondo Beach, I have confirmed that the South Bay Hospital District (BCHD before the name change) elected NOT to be the lead agency under CEQA for the 520 N Prospect Building construction, and instead, abdicated that role to the City of Redondo Beach that had discretionary permits and decisions regarding the 520 Building due to non-conforming zoning, etc. This is the same situation as the HLC project where a CUP is

As a result, BCHD should not be allowed to pick and choose when it is the CEQA lead agency, especially in this highly parallel situation. Such gaming erodes public faith in government below its current low level. BCHD must pass this CEQA activity to the City of Redondo Beach, conforming with its earlier decision in order to allow for a fair, non-biased, non-self-dealing process that fairly serves the environment. BCHD made its decision in 1988 not to act as a CEQA lead agency, and its change for the HLC is disingenuous at best. Public Record Act Requests are forthcoming for documents concerning the decision and BCHD motivations.

To be very clear, I brought this issue up a year ago in the Community Working Group when BCHD first announced it planned to act as lead agency, so BCHD was aware that there were concerns about self dealing and prior acts. Unlike BCHD protecting its parochial self-interests, the City of Redondo Beach could mitigate impacts such as lack of property taxes, first responder costs, impacts on surrounding neighborhoods of chronic stress, etc. It's time for BCHD to do the right thing, consistent with its prior acts, and turn CEQA over the City of Redondo Beach.

Mark Nelson

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:55 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Correction of CEQA Understanding Error During 7/22 BCHD Board Meeting

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---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, June 10, 2021 3:15 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Fwd: Correction of CEQA Understanding Error During 7/22 BCHD Board Meeting

DEIR comment on process failure and lack of understanding of CEQA by the lead agency.

----- Forwarded message -----

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Date:** Fri, Aug 14, 2020 at 12:40 AM  
**Subject:** Correction of CEQA Understanding Error During 7/22 BCHD Board Meeting  
**To:** <communications@bchd.org>, EIR <eir@bchd.org>  
**Cc:** <drosenfeld@scng.com>

The following is for the record in order to inform BCHD regarding the geographic impact of scoping meetings.

Neither BCHD nor SBHD, it's failed predecessor, have ever executed a CEQA EIR. In the 1980s, when the 520 building was in development, SBHD made a determination that it did not have an obligation to be the lead agency for CEQA. That situation is completely analogous to the current CEQA for the HLC, where BCHD, lacking both experience and expertise has elected to be the lead agency. In both development cases, BCHD/SBHD was the proponent. In both cases all permits required to develop were ministerial, EXCEPT, the City of Redondo Beach CUP. SBHD correctly elected to defer lead agency status to the City, the issuer of the "no-go" CUP. BCHD, on the other hand, lacking any relevant experience, erred by electing to be the lead agency for the HLC.

Notwithstanding that error, in an exchange between the CEO and a Board member, it was clear that the CEO has a fundamental lack of understanding of the role and obligation of CEQA. While self-congratulating himself on having had 5 scoping meetings instead of the one required meeting, the CEO stated that he even had one in Torrance, which was not required.

To be very clear, there are impacts from the HLC to Torrance, and therefore, Torrance residents are FULL PARTICIPANTS in the CEQA process for the EIR, not second class citizens as the CEO intimated. Four of the five scoping meetings were in excess of the bare minimum obligation, but NONE was not required because it was in Torrance. BCHD is every bit as obligated to provide participation to Torrance residents, as it is to Redondo Beach residents.

This is but one more example of why BCHD erred in its election as lead agency, both legally and technically. BCHD has neither the experience nor expertise to properly conduct CEQA and self-certify an EIR.

Mark Nelson

Redondo Beach property owner  
3 year BCHD HLC CWG volunteer  
Experienced project developer  
California Expert Witness



## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:55 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD Board, DEIR, and pre-CUP Comments - Excess Noise

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---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, June 10, 2021 3:19 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** BCHD Board, DEIR, and pre-CUP Comments - Excess Noise

### DEIR DAMAGES COMMENT - CHRONIC STRESS IMPACTS

BCHD asserts that it has never damaged the surrounding neighborhoods, despite 60 years of South Bay Hospital, medical office buildings, and various BCHD commercial operation with significant excavation, initial construction, 510 and 520 building construction, excess traffic and hazards, excess tailpipe exhaust and PMx, 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. BCHD makes its assertion in its project FAQs.

<https://www.bchdcampus.org/faq>

<https://www.bluezones.com/2019/05/how-stress-makes-us-sick-and-affects-immunity-inflammation-digestion/>

<https://www.bluezones.com/2012/03/maximize-health-and-longevity-using-these-stress-management-strategies/>

<https://americanbrainsociety.org/stress-the-silent-killer/>

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3971384/> Cardiovascular effects of environmental noise exposure

As a health enterprise, BCHD should have ample health information and no issues defending its assertion of no surrounding neighborhood damages on each and every point above for the 60 years prior to this proposed project, for project construction, and for project operation. BCHD has also asserted to the Redondo Beach City Attorney that this project "Clearly ... has significant benefits to Redondo Beach residents" despite the fact that BCHD admits in CPRA responses that it doesn't (and hasn't for 25+ years) tracked its budgets/costs at the 40+ so-called evidence-based program level, nor does it assess benefits, nor does it monetize benefits, nor does it compute benefit-to-cost or net benefits. Further, BCHD admits in CPRA responses that it has not investigated economic injustice/property value impacts of the prior 60 years. Considering BCHDs lack of fundamental cost-benefit analysis, and lack of EJ analysis, BCHDs assertion of no negative impacts on surrounding neighborhoods appears wholly unfounded.

**This required analysis for the DEIR, and comment to the BCHD Board, and Redondo Beach and Torrance Mayors, Councils, and Planning Commissions** highlights the toxicity of PM2.5 to developing brains of school children, such as those at Towers and Beryl Heights Elementary that will needlessly suffer from BCHD planned over-development. .

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3971384/>

An excerpt from the study is below. **As a self-proclaimed leading health organization, BCHD is obligated in its DEIR to evaluate the negative impacts on the surrounding community of all negative externalities, economic and environmental injustices.** These issues will be raised again in the CUP evaluation where BCHD will not be able to sweep

MN118-3  
(cont.)

inconvenient facts under the rug with gaslighting, as BCHD cannot self-certify the CUP. Nor will BCHD be able to lie the way that it did to the Redondo Beach City Attorney when it asserted that "Clearly, .... the project will have significant benefits to Redondo Beach residents." BCHD has admitted in numerous CPRA responses that it has no analysis or accounting of existing programs. Further, BCHD has refused many CPRA requests asserting that it does not have final work product. As such, it did not have final work product for the City Attorney either in January of 2019, yet, BCHD made the unsubstantiated assertion in a February 15, 2019 letter than it withheld from the public until July 2020.

From the Study -Taken together, the present review provides evidence that noise not only causes annoyance, sleep disturbance, or reductions in quality of life, **but also contributes to a higher prevalence of the most important cardiovascular risk factor arterial hypertension and the incidence of cardiovascular diseases.** The evidence supporting such contention is based on an established rationale supported by experimental laboratory and observational field studies, and a number of epidemiological studies. The study shows that with 95% probabilities and higher, noise such as that induced by the existence of SBH and BCHD cause negative health impacts, **especially on seniors.**

**It is without dispute that excess noise, such as that caused by SBH and BCHD, and planned by BCHD, causes cardiovascular damage, day and night.**

This is a clear example of how past, current, and future commercial, traffic, motor/air handler, and emergency vehicle noises have, are, and will negatively impact the surrounding neighborhoods. The impacts are severe in the cardiovascular damage space as recognized in myriad peer-reviewed studies.

MN118-4

Results:

ROAD NOISE FROM EXCESS TRAFFIC AS AN EXAMPLE - **Road traffic noise was associated with myocardial infarction** in case-control and cohort studies. The strength of this association increased when subjects with hearing impairment were excluded. Exposure to residential road traffic noise was associated with a **higher risk for stroke among people older than 64.5 years of age**, showing a risk increase per 10 dB increase of the noise level (LDEN) (incidence rate ratio = 1.27, CI = 1.13–1.43, P < 0.0001).

Conclusions:

The role of noise as an environmental pollutant and its impact on health are being increasingly recognized. Beyond its **effects on the auditory system, noise causes annoyance and disturbs sleep, and it impairs cognitive performance.** Furthermore, evidence from epidemiologic studies demonstrates that environmental noise is associated with an **increased incidence of arterial hypertension, myocardial infarction, and stroke.** Both observational and experimental studies indicate that in particular **night-time noise can cause disruptions of sleep structure**, vegetative arousals (e.g. increases of blood pressure and heart rate) and increases in stress hormone levels and oxidative stress, which in turn may result in **endothelial dysfunction and arterial hypertension.**



## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:56 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: DEIR Comment - BCHD failure to quantify benefits, defective Program Objectives regarding revenues

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, June 10, 2021 3:57 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** DEIR Comment - BCHD failure to quantify benefits, defective Program Objectives regarding revenues

According to Dan Witters, Gallup, in <https://bit.ly/BCHDGallupJan2021BoD> video extract of the BCHD Jan 2021 Board meeting, Gallup does NOT and NEVER HAS, evaluated any programs. Witters further states that the only intent is to provide time series measurement of the well being index, without determination of cause of movement of the index.

Thus BCHDs Program Objectives referring to required current and future revenues are invalid based on Gallup. BCHD in CPRA responses has provided no other analyses that BCHD has any statistically significant or valid program evaluation studies of benefits.

MN119-1

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:56 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD #2019060258 makes no reference to the master plan in their DEIR or in its Filing with the OPR

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, June 10, 2021 4:00 PM  
**To:** Communications <Communications@bchd.org>; EIR <eir@bchd.org>  
**Cc:** Scott Morgan <Scott.Morgan@opr.ca.gov>  
**Subject:** BCHD #2019060258 makes no reference to the master plan in their DEIR or in its Filing with the OPR

Nowhere in the DEIR document of record does BCHD reference the master plan. The only master plan in the record is the 2019 version from the DEIR. I cannot see how the public interest was served by failing to incorporate the master plan that contains the full project.

The DEIR was defective and the master plan needs to be included and the DEIR needs to be re-noticed to the public for review.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:54 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Late Filed NOP Comment or Early Filed DEIR comment  
**Attachments:** No Project Alternative.odt

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, June 10, 2021 3:13 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Fwd: Late Filed NOP Comment or Early Filed DEIR comment

MN121-1 DEIR Comment on defective No Project Alternative

----- Forwarded message -----

**From:** Mark Nelson (Home Gmail) <[menelson@gmail.com](mailto:menelson@gmail.com)>  
**Date:** Fri, Aug 23, 2019 at 9:53 AM  
**Subject:** Late Filed NOP Comment or Early Filed DEIR comment  
**To:** EIR <[eir@bchd.org](mailto:eir@bchd.org)>, <[hlcinfo@bchd.org](mailto:hlcinfo@bchd.org)>

MN121-1  
(cont.) Attached is a view of the No Project Alternative

### No Project Alternative

Per representations to the Community Working Group (CWG) the purpose of the BCHD HLC project is primarily financial, that is, it is a development to raise funds for the ongoing operation of the BCHD. There is no objective evidence that the beach cities (Hermosa Beach, Redondo Beach, and Manhattan Beach) will have any shortfall of assisted living units absent the BCHD development. In fact to date, the free market has been effective in providing market rate assisted living units to the area. No assisted living units associated with areas outside of the Beach Cities are within the appropriate purview of the BCHD.

The 510 N. Prospect and 520 N. Prospect buildings are represented to the CWG as land leases with BCHD to be the cost-less recipient of the buildings at the end of the land leases. Termination dates of the land leases have been represented as 2030 and 2060, respectively. There is no evidence to demonstrate whether the land leases could be renewed or whether or not the buildings could be financially beneficial as lease units.

MN121-1  
(cont.) The 514. N. Prospect building is the failed South Bay Hospital. Because it is not, nor will ever again be a hospital, it is not subject to hospital seismic retrofit. None of the three buildings are subject to mandatory seismic retrofit, therefore, any retrofit or demolition with replacement is a wholly discretionary and can be avoided.

In the No Project Alternative, the 514 N. Prospect building could be repurposed and leased for revenue, or demolished if economically more viable. Either action would have a significantly lesser impact on the environment than the project. The 510 and 520 N. Prospect buildings could be leased for revenue. As the voters of the Beach Cities only voted on, and approved the now defunct South Bay Hospital District, BCHD has no publicly voted mandate for continued operation beyond its own desire to operate. BCHD would need to manage its services within the revenues that it could achieve through leasing buildings or terminate itself. In either case, the No Project Alternative has significantly lesser environmental impacts and is well within the charter granted by the voters of the Beach Cities when they approved formation of the South Bay Hospital District, absent a specific vote of the Beach Cities to authorize the proposed project.

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:59 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD Aesthetics Analysis is Flawed

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, June 10, 2021 4:47 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** BCHD Aesthetics Analysis is Flawed

Per the attached Google Earth Pro analysis of viewshed, BCHD has incorrectly failed to conclude that the impact of the 103-foot building and the phase 2 are both significant impacts. As Wood is well aware, GEP demonstrates viewshed in green. The viewshed is extensive, impacts many residential uses, and creates shading/shadowing and negative health impacts, along with a "taking" of blue sky, and diminished recreation. BCHD analysis errs. The view impacts of the proposed project are significant and the analysis is defective and the DEIR must be recirculated.

MN122-1

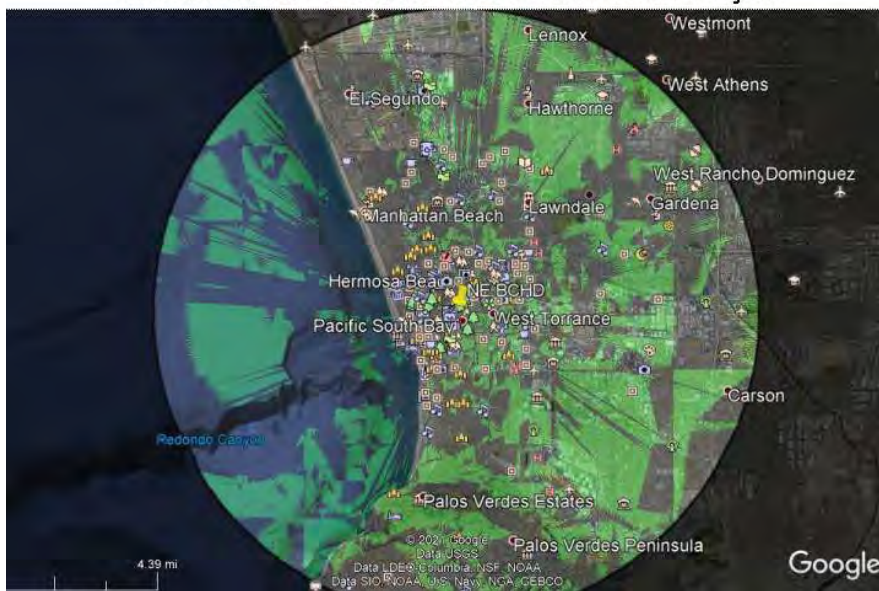
BCHD Increased the Height of its  
Proposed Buildings from 60-feet to  
103-feet after Public Comments that  
they were TOO BIG.

## YOU CAN'T MAKE THIS UP!

The following are the viewshed impacts according to  
Google Earth Pro. If you live in a GREEN area, BCHD  
Overdevelopment will be able to see you, and you'll be  
able to see it.

They gave themselves REALLY nice ocean Views!

Google Earth Pro Results – Green Areas Will Be Able to See the  
103-foot BCHD Peak on the NE Side of the Project



Google Earth Pro Results – Green Areas Will Be Able to See the 103-foot BCHD Peak on the NE Side of the Project (Close Up #1)

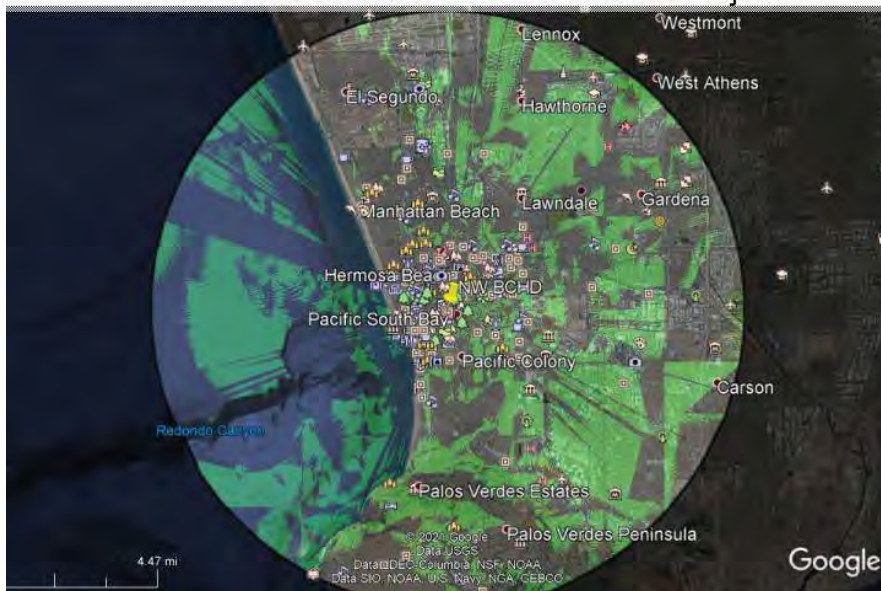


Google Earth Pro Results – Green Areas Will Be Able to See the 103-foot BCHD Peak on the NE Side of the Project (Close Up #2)

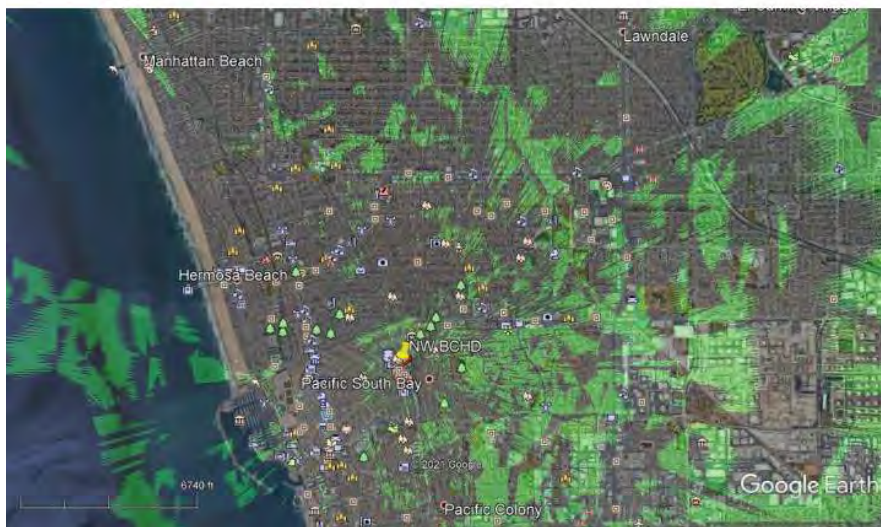




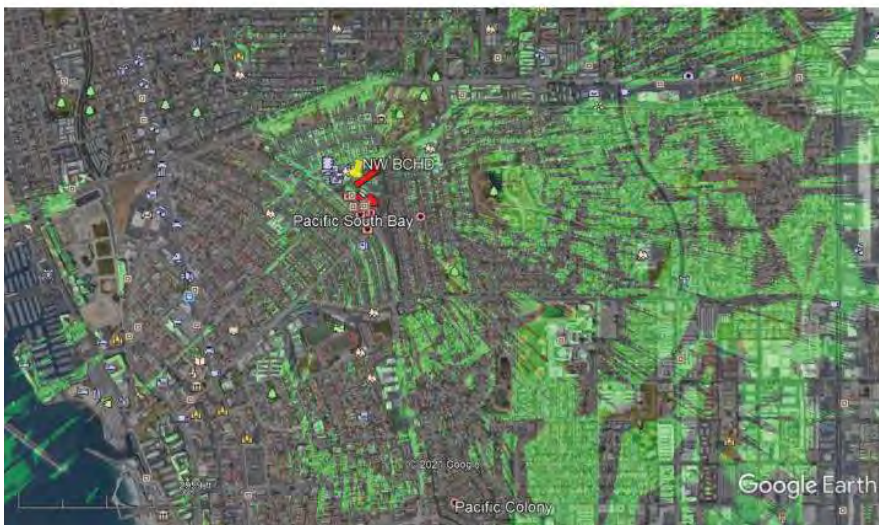
Google Earth Pro Results – Green Areas Will Be Able to See the 85-foot BCHD Peak on the NW Side of the Project



Google Earth Pro Results – Green Areas Will Be Able to See the 85-foot BCHD Peak on the NW Side of the Project (Close Up #1)



Google Earth Pro Results – Green Areas Will Be Able to See the 85-foot BCHD Peak on the NW Side of the Project (Close Up #2)

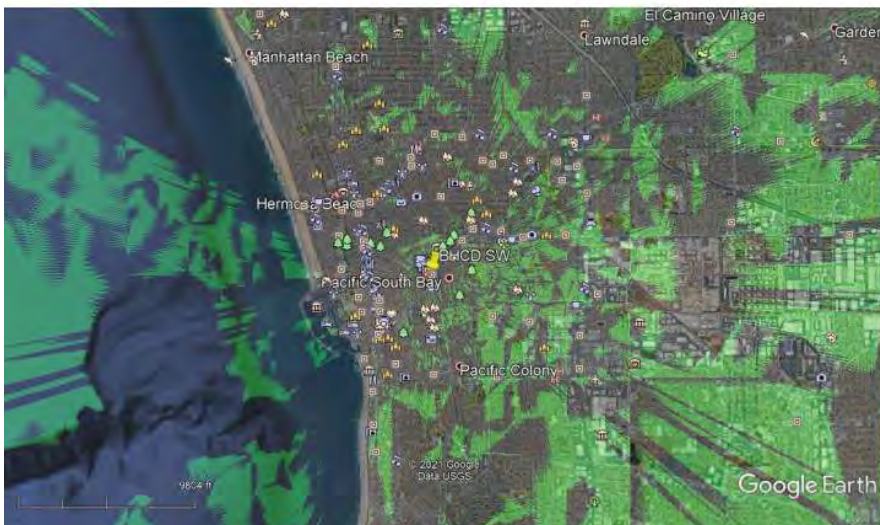


Google Earth Pro Results – Green Areas Will Be Able to See the 75-foot BCHD Peak on the SW Side of the Project

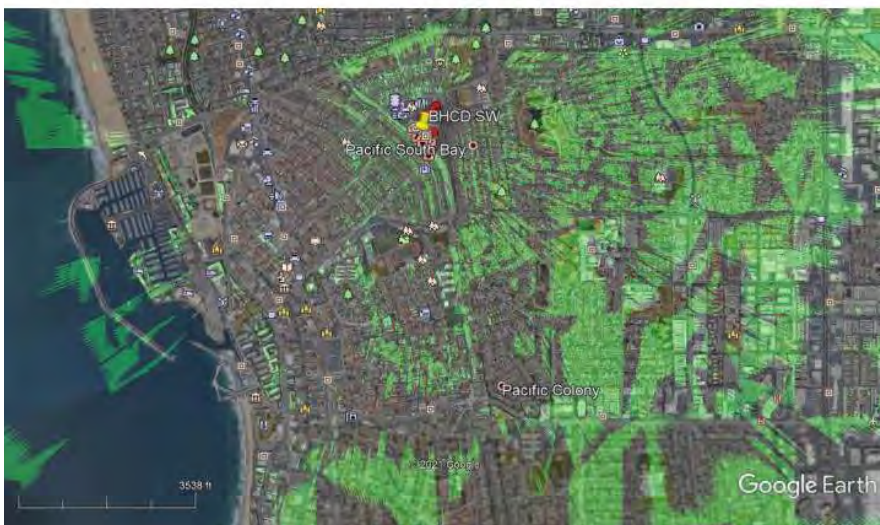




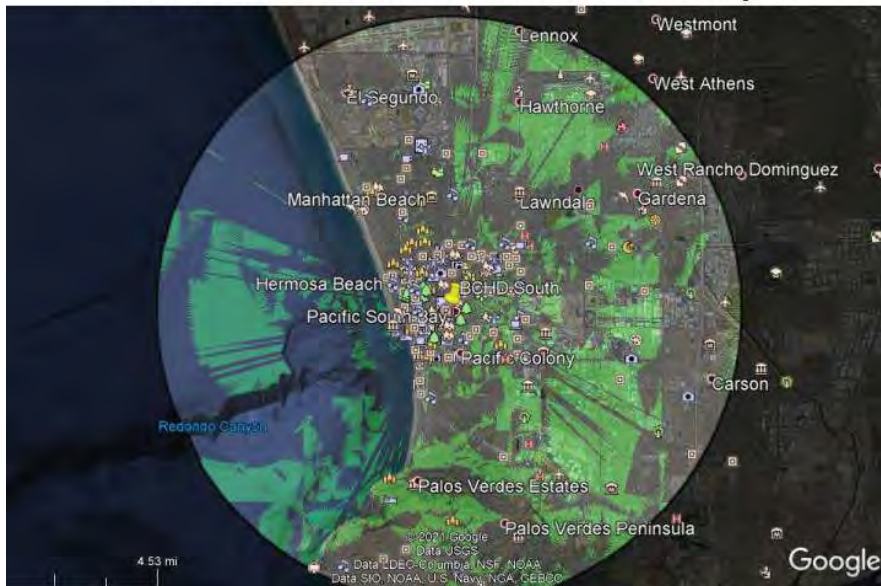
Google Earth Pro Results – Green Areas Will Be Able to See the 75-foot BCHD Peak on the SW Side of the Project (Close Up #1)



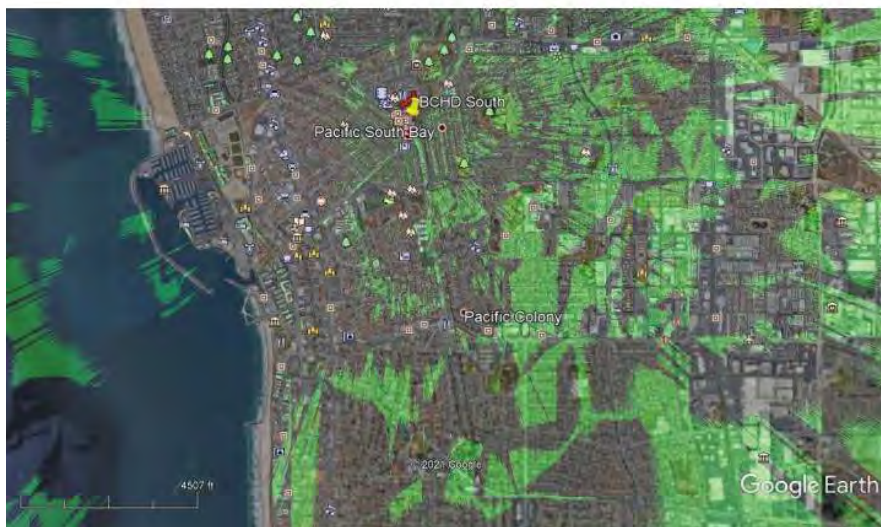
Google Earth Pro Results – Green Areas Will Be Able to See the 75-foot BCHD Peak on the SW Side of the Project (Close Up #2)



Google Earth Pro Results – Green Areas Will Be Able to See the  
66-foot BCHD Peak on the South Side of the Project

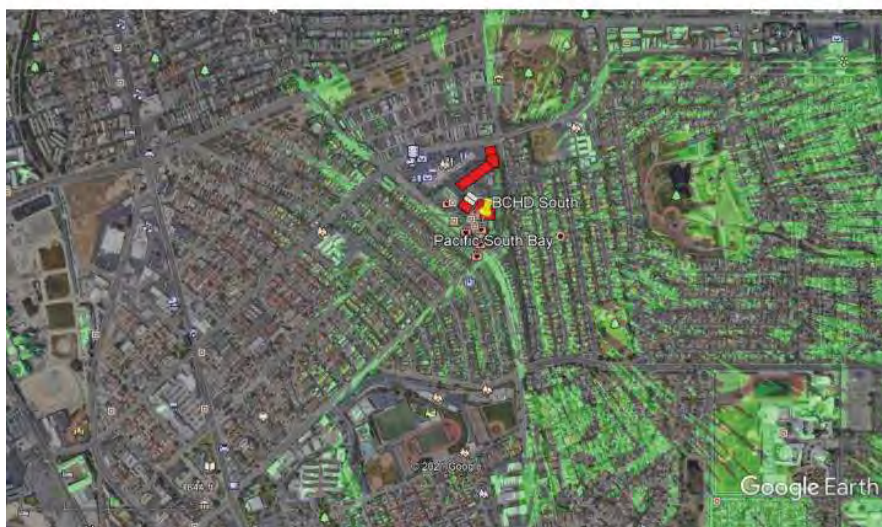


Google Earth Pro Results – Green Areas Will Be Able to See the  
66-foot BCHD Peak on the South Side of the Project (Close Up #1)





Google Earth Pro Results – Green Areas Will Be Able to See the  
66-foot BCHD Peak on the South Side of the Project (Close Up #2)



## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:59 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD Significant Negative Impacts to Neighborhood Character

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, June 10, 2021 4:50 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** BCHD Significant Negative Impacts to Neighborhood Character

MN123-1 | BCHD DEIR failed to correctly analyze KVLs by analyzing too few and drawing incorrect conclusions. The impacts to surrounding neighborhood character are negative and significant. The DEIR is defective, must be remediated and recirculated.

From 511 N Prospect  
4-story, 65-foot tall Health Club Pavilion (L)  
10-1/2 Story Parking Ramp (R)



MN123-1  
(cont.)

From 521 N Prospect  
6-story, 103-foot , \$12,000+/month Assisted Living (L)  
4-story, 65-foot tall Health Club Pavilion (C)  
10-1/2 Story Parking Ramp (R)





From 601 N Prospect

6-story, 103-foot , \$12,000+/month Assisted Living (L)

4-story, 65-foot tall Health Club Pavilion (C)

10-1/2 Story Parking Ramp (R)



MN123-1  
(cont.)

From 611 N Prospect

6-story, 103-foot , \$12,000+/month Assisted Living (L)

4-story, 65-foot tall Health Club Pavilion (C)

10-1/2 Story Parking Ramp (R)



From 621 N Prospect

6-story, 103-foot , \$12,000+/month Assisted Living (L)

4-story, 65-foot tall Health Club Pavilion (C)

10-1/2 Story Parking Ramp (R)



MN123-1  
(cont.)

From 1400 Diamond

10-1/2 Story Parking Ramp (L)

6-story, 103-foot , \$12,000+/month Assisted Living (R)



From 1408 Diamond  
10-1/2 Story Parking Ramp (L)  
6-story, 103-foot , \$12,000+/month Assisted Living (R)



MN123-1  
(cont.)

From 1201 Beryl  
6-story, 103-foot , \$12,000+/month Assisted Living (L)  
4-story, 65-foot tall Health Club Pavilion (R)





From 1211 Beryl  
6-story, 103-foot , \$12,000+/month Assisted Living (L)

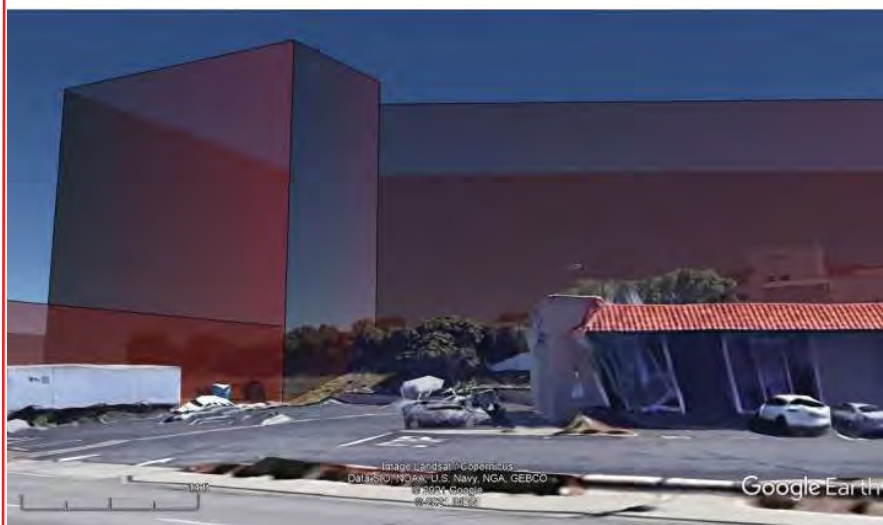


MN123-1  
(cont.)

From 1221 Beryl  
6-story, 103-foot , \$12,000+/month Assisted Living (L)

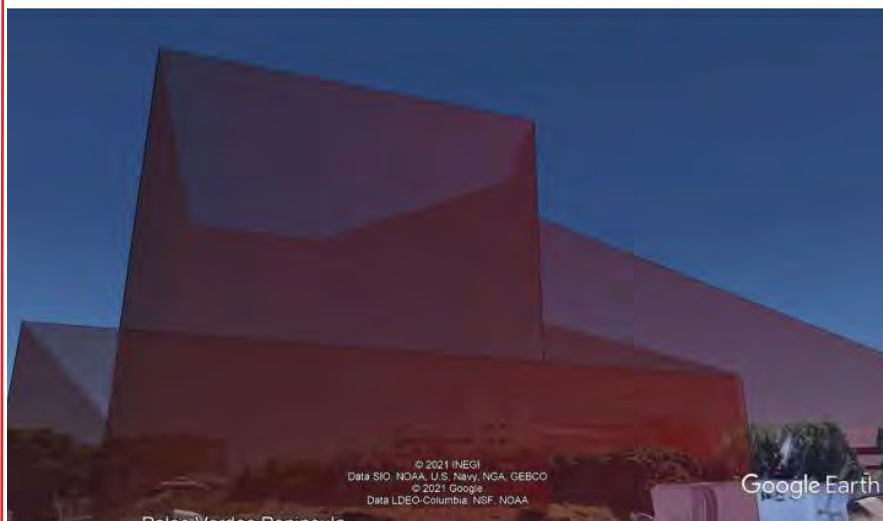


From 1311 Beryl  
PACE (L)  
6-story, 103-foot , \$12,000+/month Assisted Living (R)



MN123-1  
(cont.)

From 1321 Beryl  
PACE (Front)  
6-story, 103-foot , \$12,000+/month Assisted Living (Top + R)



From Towers Elementary

PACE (R)

6-story, 103-foot , \$12,000+/month Assisted Living (C)

4-story, Health Club/Pavilion (C)

10-1/2 Story Parking (L)



MN123-1  
(cont.)

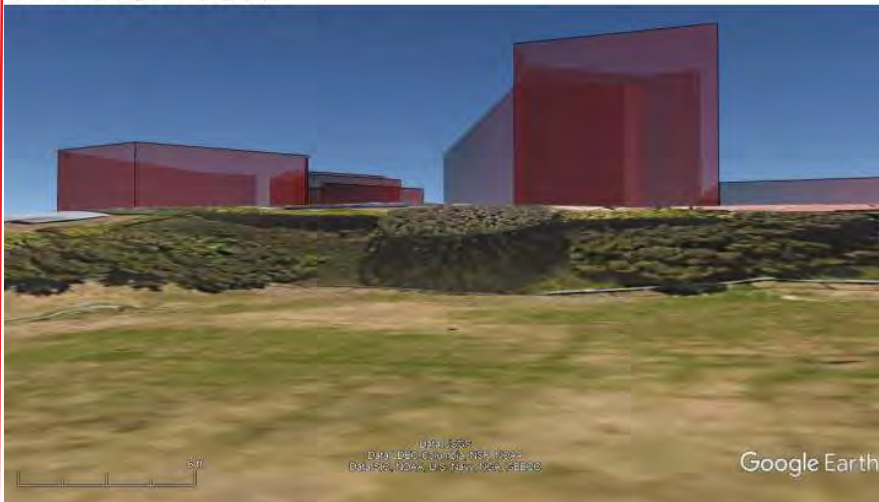
From Towers Elementary School and Public Recreation Fields

PACE (R)

6-story, 103-foot , \$12,000+/month Assisted Living (C)

4-story, Health Club/Pavilion (C)

10-1/2 Story Parking (L)



From 19301 Tomlee  
10-1/2 Story Parking Ramp (L)  
4-story, 65-foot tall Health Club Pavilion (C)  
6-story, 103-foot , \$12,000+/month Assisted Living (R)



MN123-1  
(cont.)

From 19326 Tomlee  
6-story, 103-foot , \$12,000+/month Assisted Living (R)





From 19326 Tomlee  
10-1/2 Story Parking Ramp (L)  
6-story, 103-foot , \$12,000+/month Assisted Living (R)



MN123-1  
(cont.)

From 5656 Towers  
6-story, 103-foot , \$12,000+/month Assisted Living (R)  
4-story, 65-foot tall Health Club Pavilion (C)  
10-1/2 Story Parking Ramp (L)



From 5635 Towers

6-story, 103-foot , \$12,000+/month Assisted Living (R)

4-story, 65-foot tall Health Club Pavilion (C)

10-1/2 Story Parking Ramp (L)



MN123-1  
(cont.)

From 19510 Tomlee

6-story, 103-foot , \$12,000+/month Assisted Living (R)

4-story, 65-foot tall Health Club Pavilion (C)

10-1/2 Story Parking Ramp (L)



From 19802 Tomlee

6-story, 103-foot , \$12,000+/month Assisted Living (R)

4-story, 65-foot tall Health Club Pavilion (C)

10-1/2 Story Parking Ramp (L)



MN123-1  
(cont.)

From 827 Anita

6-story, 103-foot , \$12,000+/month Assisted Living



From 600 Anita

6-story, 103-foot , \$12,000+/month Assisted Living (L)

4-story, 65-foot tall Health Club Pavilion (C)

10-1/2 Story Parking Ramp (L)



MN123-1  
(cont.)

From 700 N Paulina

6-story, 103-foot , \$12,000+/month Assisted Living (L)

4-story, 65-foot tall Health Club Pavilion (C)

10-1/2 Story Parking Ramp (L)

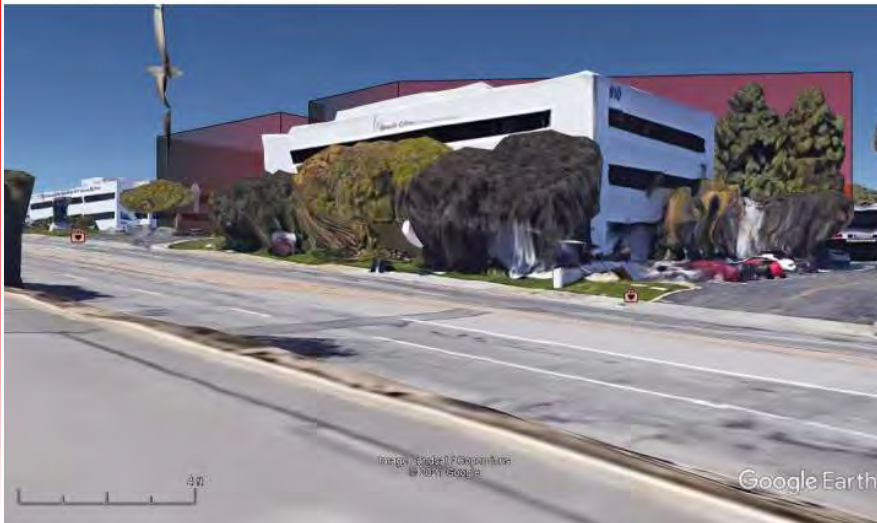




# Neighborhood Character Impacts of BCHD 103-foot tall, 800,000 sqft Development

MN123-1  
(cont.)

From 501 N Prospect  
4-story, 65-foot tall Health Club Pavilion (L)  
10-1/2 Story Parking Ramp (R)



## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:59 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: DEIR Comments - Significant Impact Specific Analysis of BCHD Aesthetics

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, June 10, 2021 4:52 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** DEIR Comments - Significant Impact Specific Analysis of BCHD Aesthetics

MN124-1 The DEIR analysis is insufficient and defective. These proper KVLs demonstrate the specific significant impacts to neighborhood aesthetics and character. The project fails City of Redondo Beach requirements of consistency with the surrounding neighborhoods.

## Visual Simulations of BCHD Proposed View-block Maximizing Perimeter Construction – Harkness & Beryl



## Visual Simulations of BCHD Proposed View-block Maximizing Perimeter Construction – Prospect & Beryl





## Visual Simulations of BCHD Proposed View-block Maximizing Perimeter Construction – Towers Elementary Student and Public Sport Recreation



MN124-1  
(cont.)

## Visual Simulations of BCHD Proposed View-block Maximizing Perimeter Construction – Towers & Mildred



**Visual Simulations of BCHD Proposed View-block  
Maximizing Perimeter Construction – south Tomlee  
turn**



MN124-1  
(cont.)

**Visual Simulations of BCHD Proposed View-block  
Maximizing Perimeter Construction – Tomlee &  
Norton**



## Visual Simulations of BCHD Proposed View-block Maximizing Perimeter Construction – Prospect & Diamond



## MN124-1 (cont.) Visual Simulations of BCHD Proposed View-block Maximizing Perimeter Construction – Diamond Residential cul-de-sac



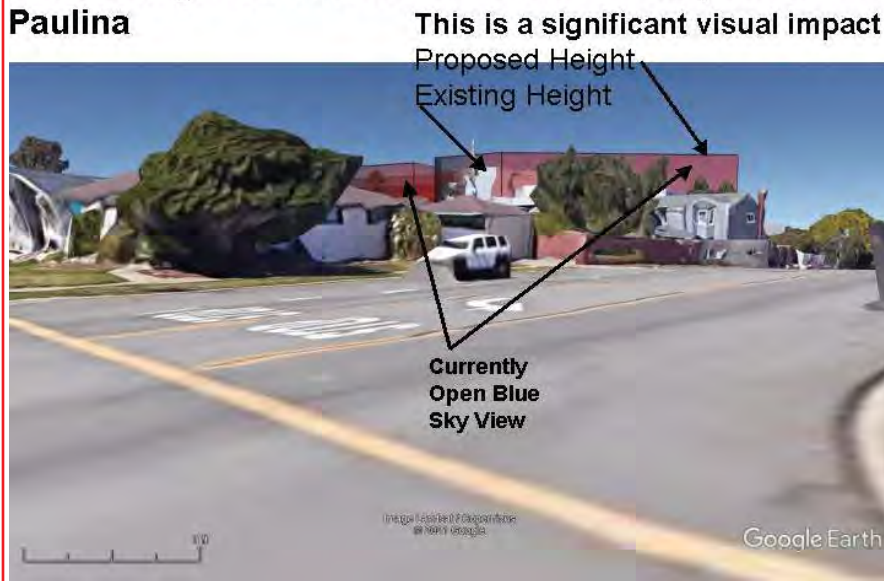


## Visual Simulations of BCHD Proposed View-block Maximizing Perimeter Construction – Prospect Residential at BCHD Entrance



MN124-1  
(cont.)

## Visual Simulations of BCHD Proposed View-block Maximizing Perimeter Construction – Prospect & Paulina

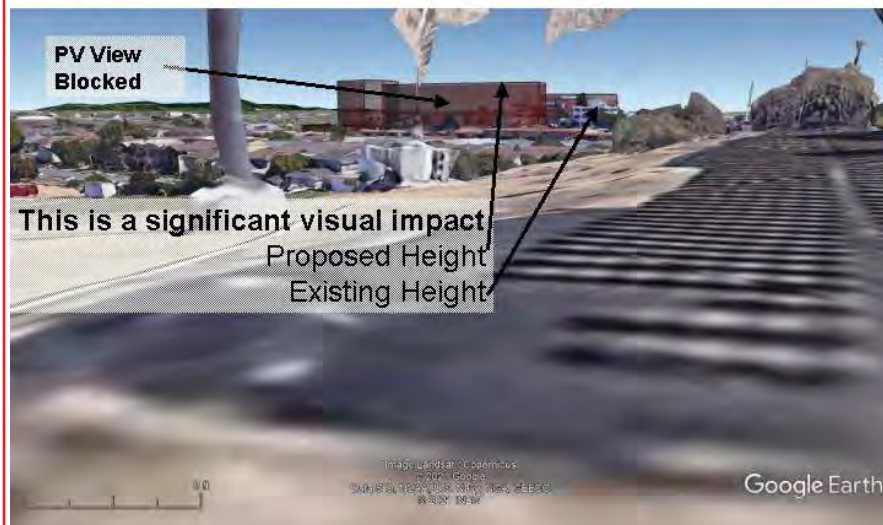


## Visual Simulations of BCHD Proposed View-block Maximizing Perimeter Construction – Beryl & Paulina

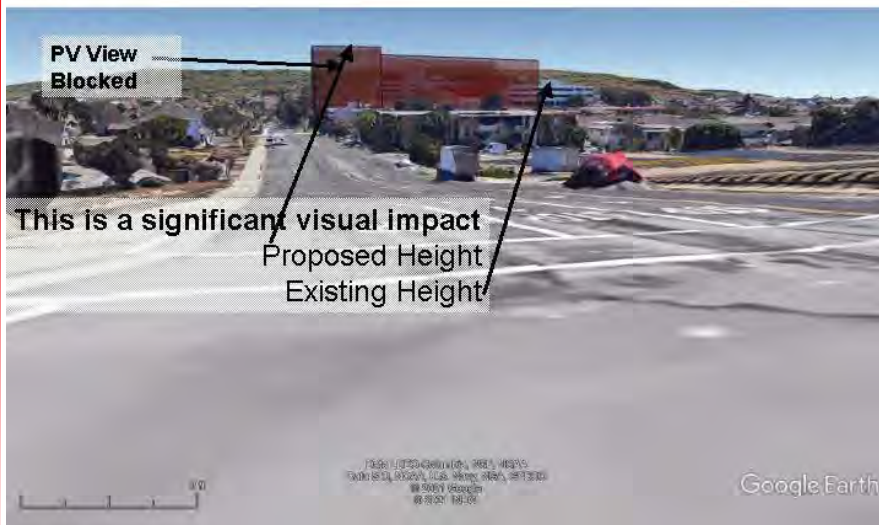


MN124-1  
(cont.)

## Visual Simulations of BCHD Proposed View-block Maximizing Perimeter Construction – 190<sup>th</sup> & Prospect



## Visual Simulations of BCHD Proposed View-block Maximizing Perimeter Construction – Prospect & Flagler



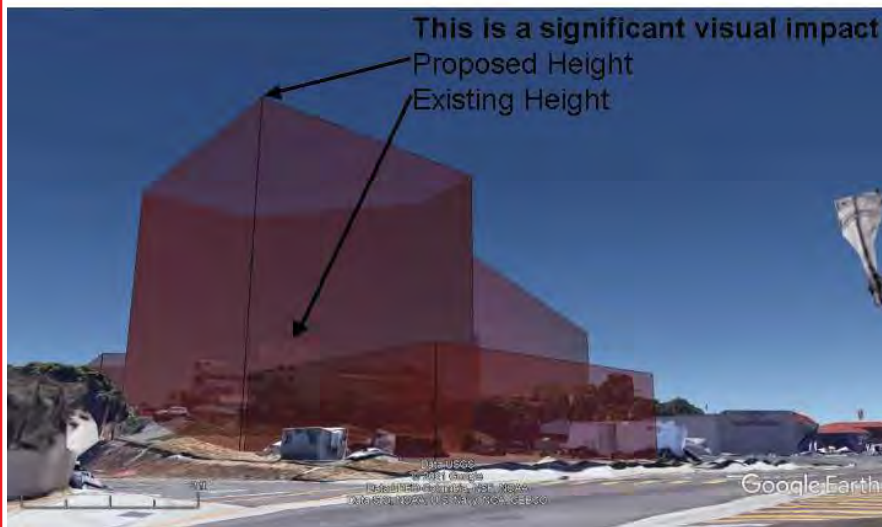
MN124-1  
(cont.)

## The Significant Visual Impacts of BCHD Proposed 2021 DEIR Development

As Modeled in Google Earth Pro

## Visual Simulations of BCHD Proposed View-block Maximizing Perimeter Construction – Flagler & Beryl

MN124-1  
(cont.)





## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 2:00 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: DEIR Comment - BCHD Failed to Properly Consider Public Input

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---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, June 10, 2021 4:55 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** DEIR Comment - BCHD Failed to Properly Consider Public Input

MN125-1 | BCHD progressively increased the height of the project from 60' to 103' and the amount of above ground building square feet from 729K to 793K. During the same period, comments from the public, especially the 1200+ resident petition, called for smaller sizes. All statements referring to BCHD modifying the plan in response to public comment are objectively false and must be stricken from the DEIR. The DEIR must be recirculated.

**YOU CANNOT TRUST BCHD – ITS ACTIONS DON'T MATCH ITS WORDS**

## **BIGGER + TALLER + NO PARKING BUFFER**



### **June 2019 BCHD Design**

60-ft tall

729,000-sqft above ground  
160,000-sqft new underground parking



### **June 2020 BCHD Design**

75-ft tall

793,000-sqft above ground  
0-sqft new underground parking



### **March 2021 BCHD Design**

103-ft tall

793,000-sqft above ground  
0-sqft new underground parking

**YOU CANNOT TRUST BCHD – ITS ACTIONS DON'T MATCH ITS WORDS**

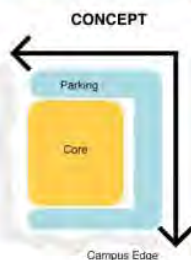
### **(1)What BCHD SAID**

BCHD told the CWG  
and Public – BCHD will use  
parking lots to buffer the  
neighborhoods  
June 2017 CWG Meeting

### **(2)What BCHD DID**

Proposed a  
60-foot  
800,000 sqft Walled City up  
against residential  
neighborhoods with NO  
parking buffer  
January 2019 CWG Meeting

#### **Healthy Living Campus Parking Approach**



MN125-1  
(cont.)

### (3)What the BCHD BOARD APPROVED

Increased height to  
75-feet  
removed 160,000 sqft  
underground parking, replace  
parking with an 8-story, 800  
car parking ramp  
Approved at Board Meeting  
June 2020 Board Meeting



### (4)What BCHD REALLY DID

Increased height to  
**103-feet**  
increased parking ramp to  
10+ stories  
March 2021  
March 2021 Draft Environmental Impact Report



## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 2:01 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: CPRA - Provide an inventory of comments received on the DEIR

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, June 10, 2021 4:59 PM  
**To:** PRR <PRR@bchd.org>; EIR <eir@bchd.org>  
**Subject:** CPRA - Provide an inventory of comments received on the DEIR

MN126-1 Provide an inventory of comments received as soon as practicable. As an expert witness, I am fully aware the Wood will be required to log and inventory and this is request for those existing records as soon as available.

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 2:02 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Comments to the BCHD Board , DEIR, and FEIR  
**Attachments:** BCHD RCFE Decision Pre-determined.pdf

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

---

**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, June 10, 2021 5:45 PM  
**To:** EIR <eir@bchd.org>; Communications <Communications@bchd.org>  
**Subject:** Comments to the BCHD Board , DEIR, and FEIR

MN127-1 The attached PDF discusses how BCHD has predetermined the outcome of its project and CEQA certification rendering it invalid.

## **FAILURE TO DEVELOP MASTER PLANS WITH NON-RCFE DRIVEN REVENUE STREAMS WITH ADEQUATE POTENTIAL FOR CURRENT AND FUTURE FUNDING**

BCHD has failed to adequately consider options to residential care for there elderly (RCFE), thereby making a defacto decision to select and approve RCFE from both a project proponent and lead agency perspective. In each of BCHDs 2009, 2017, 2019, 2020, and 2021 vintage master plans, BCHD included RCFE with no other apparent revenue generating alternative of sufficient magnitude to meet BCHDs unsupported, non-quantitative revenue needs. Board meeting minutes reflect the RCFE as the revenue generation vehicle for the BCHD on a forward basis, while BCHD presentations also support the premise that BCHD made an ex ante decision to proceed with RCFE.

BCHD plans and first known public occurrences of plans are cited below. Each plan contains RCFE absent any viable alternative revenue generating options, thereby requiring BCHD to approve RCFE as lead agency to meet its appetite for revenue as a proponent. Endnotes provide direct access via web when available and also selected quotations of the Board and CEO demonstrating the total reliance on RCFE and lack of alternatives.

2009 (Dec) Board of Directors Master Planning Sessions 1 & 2 <sup>i ii</sup>

2017 (Apr) Board of Directors Meeting Presentation <sup>iii</sup>

2017 (Jun) BCHD Community Working Group (CWG) Presentation <sup>iv</sup>

2019 (Jan) Board of Directors Special Meeting <sup>v vi vii</sup>

2019 (Jan) BCHD CWG Presentation <sup>viii</sup>

2019 (Jun) CEQA NOP <sup>ix</sup>

2020 (Jun) Board of Directors Meeting <sup>x xi xii xiii</sup>

2020 (Jun) BCHD CWG Presentation <sup>xiv xv</sup>

2021 (Mar) CEQA DEIR <sup>xvi</sup>

## **CONSULTANT SURVEYS OF BCHD MANAGEMENT SUPPORT THE RCFE-DRIVEN STRATEGY**

In addition to the observation of BCHDs failure to develop and include, BCHD consultants state in their presentations that BCHD management believed the RCFE was necessary as a revenue stream. <sup>xvii</sup> In addition, the consultants recorded a BCHD management believe that the South Bay Hospital parcel was key to revenues. <sup>xviii</sup> The consultant failed to demonstrate that any alternative revenue streams could replace RCFE.

## **CEO BAKALY STATEMENTS AT JUNE 2020 BOARD MEETING REQUIRE RCFE**

CEO Bakaly's comments in the minutes fail to provide any viable alternative to RCFE, in fact, they paint a dire picture of mismanagement and failure to match expenditures to declining revenues. Directly from the minutes, Bakaly cites a projected \$2.5M annual lost

Mr. Bakaly highlighted the following:

Anticipated Future Operating Income Gap:

<\$2.5M> 514 N Prospect Ave Loss

<\$0.5M> FY23-24 Notes Receivable Loss

<\$2.5M> Total Annual BCHD Future Loss

MN127-2  
(cont.)

“If we do not do anything for that building, we start to plummet as the old building drains the revenue. Adding the RCFE 6-story you will see a dip but as they begin to get occupied they will go up and see gained net income out into the future. If we don’t do something, we will eat away at our cash balance.”

Subsequently, Bakaly affirms the eventually Board approved RCFE proposal in June 2020. <sup>xix</sup>

MN127-3

**NONE OF THE PROJECT ALTERNATIVES WITHOUT RCFE MEET THE OBJECTIVES**

The fact that BCHD has no revenue generation scenarios in its alternatives that meet the project objectives is prima facie evidence that BCHD failed to consider non-RCFE cases. As such BCHD explicitly chose RCFE as the proponent and then implicitly approved RCFE as lead agency. Due to errors in the DEIR document, the Alternatives are misnumbered, the tables are inaccurate, and there is not a simple way to describe the alternatives. Suffice it say, the BCHD objectives to raise revenue could be achieved in nearly an infinite number of ways, but BCHD chose to ONLY pursue RCFE, and therefore approve it as lead agency. <sup>xx</sup>



- i Board of Directors Master Planning Study Session I July 13, 2009 (secured by CPRA Response)
- ii Board of Directors Master Planning Study Session 2 August 3, 2009 (secured by CPRA Response)
- iii [https://bchd.granicus.com/DocumentViewer.php?file=bchd\\_d50a42f0ae3671fb9e7c42afcc7a2b69.pdf&view=1](https://bchd.granicus.com/DocumentViewer.php?file=bchd_d50a42f0ae3671fb9e7c42afcc7a2b69.pdf&view=1)
- iv [https://www.bchdcampus.org/sites/default/files/archive-files/June-2017-Presentation\\_CWG\\_2.pdf](https://www.bchdcampus.org/sites/default/files/archive-files/June-2017-Presentation_CWG_2.pdf)
- v [https://bchd.granicus.com/DocumentViewer.php?file=bchd\\_733e3151c563f3eff4394bb97d7cc860.pdf&view=1](https://bchd.granicus.com/DocumentViewer.php?file=bchd_733e3151c563f3eff4394bb97d7cc860.pdf&view=1)
- vi CEO Bakaly at Jan 2019 meeting stated in meeting minutes "... phase 1 will include new residential care"
- vii Board member Diehl at Jan 2019 meeting stated in meeting minutes "The money making entity will be the assisted living"
- viii [https://www.bchdcampus.org/sites/default/files/archive-files/January-2019-Presentation\\_CWG.pdf](https://www.bchdcampus.org/sites/default/files/archive-files/January-2019-Presentation_CWG.pdf)
- ix [http://www.bchdfiles.com/docs/bchd/BCHD%20Healthy%20Living%20Campus%20Master%20Plan\\_NOP\\_IS%20Checklist\\_062719.pdf](http://www.bchdfiles.com/docs/bchd/BCHD%20Healthy%20Living%20Campus%20Master%20Plan_NOP_IS%20Checklist_062719.pdf)
- x [https://bchd.granicus.com/DocumentViewer.php?file=bchd\\_679f4d3a34cda8ac6b2919e80e087631.pdf&view=1](https://bchd.granicus.com/DocumentViewer.php?file=bchd_679f4d3a34cda8ac6b2919e80e087631.pdf&view=1)
- xi <https://bit.ly/ChunSaysPoundSand>
- xii Board member Chun moves to terminate public input under the assertion that the outcome would not change (e.g., the Board would make the same decision)
- xiii BCHD states in newspaper article that "create the revenue to maintain BCHD's program" yet proposes no alternative to RCFE, <https://www.dailybreeze.com/2020/06/16/beach-cities-health-district-to-cut-healthy-living-campus-revamp-by-160-million>
- xiv [https://www.bchdcampus.org/sites/default/files/archive-files/June-2020-Presentation\\_CWG.pdf](https://www.bchdcampus.org/sites/default/files/archive-files/June-2020-Presentation_CWG.pdf)
- xv BCHD presentation to CWG states "Generate sufficient revenue" and continues to include no feasible alternative to RCFE for revenues
- xvi <https://www.bchdcampus.org/deir>
- xvii BCHD management affirmed a "Belief that assisted living and residential care revenue streams can help fund the campus transformation...", [https://bchd.granicus.com/DocumentViewer.php?file=bchd\\_5e73160722203dcafebc71582eaf2df3.pdf&view=1](https://bchd.granicus.com/DocumentViewer.php?file=bchd_5e73160722203dcafebc71582eaf2df3.pdf&view=1)
- xviii BCHD management affirmed "Real estate footprint and limited partnerships remain critical to offset operating costs and fund programs and services.", [https://bchd.granicus.com/DocumentViewer.php?file=bchd\\_5e73160722203dcafebc71582eaf2df3.pdf&view=1](https://bchd.granicus.com/DocumentViewer.php?file=bchd_5e73160722203dcafebc71582eaf2df3.pdf&view=1)
- xix [https://bchd.granicus.com/DocumentViewer.php?file=bchd\\_85ffaa86cc3c77533acb31079b3a41c6.pdf&view=1](https://bchd.granicus.com/DocumentViewer.php?file=bchd_85ffaa86cc3c77533acb31079b3a41c6.pdf&view=1)
- xx [https://www.bchdfiles.com/docs/hlc/BCHD\\_DEIR\\_For%20Print\\_031021.pdf](https://www.bchdfiles.com/docs/hlc/BCHD_DEIR_For%20Print_031021.pdf)

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 11:39 AM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Comments to be Read into the record

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

---

**From:** Mark Razavi <markrazavi@gmail.com>  
**Sent:** Wednesday, March 24, 2021 6:55 PM  
**To:** Communications <Communications@bchd.org>  
**Subject:** Public Comments to be Read into the record

MR-1 | My name is Mark Razavi and I oppose the scale of the BCHD project. I live on Ronald Ave with my wife and 2 kids who attend Towers Elementary. We spend a lot of time outdoors, and I have strong concerns about the adverse effect of several years of demolition and construction so close to our home and school.

Thank you

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:38 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Comment on the Healthy Living Campus DEIR

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**From:** Mary's Gmail <maryleninger@gmail.com>  
**Sent:** Tuesday, June 8, 2021 11:58 AM  
**To:** EIR <eir@bchd.org>  
**Subject:** Comment on the Healthy Living Campus DEIR

To whom it may concern:

I strongly object to the inappropriate, out-of-proportion scope of this development and the negative impact the years of construction will have on our neighborhoods. The increase in traffic, noise and air pollution, as well as the removal of over a hundred mature trees, will be devastating to the residents' quality of life in West Torrance and Redondo Beach.

The BCHD needs to consider the wishes, mental and physical health and well being of Redondo Beach and West Torrance residents!

Mary L. Eninger  
5609 Andrus Ave.  
Torrance, CA 90503

Sent from my iPad

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:51 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: opposition to the proposed "Healthy Living Campus"

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---

**From:** Mary Ewell <maryewell@verizon.net>  
**Sent:** Thursday, June 10, 2021 10:13 AM  
**To:** EIR <eir@bchd.org>  
**Subject:** opposition to the proposed "Healthy Living Campus"

ME-1 I have been opposed to the Healthy Living campus from the first time the public were invited to attend your BCHD board meetings for many of the reasons below. I began appealing to the Board as a licensed Marriage and Family Therapist who has advocated for our youth, our greatest resource, whose lives in 5 neighboring schools would be disrupted as they come/go to school and during their school day for the particulate pollution they would be ingesting, exacerbating some breathing conditions more than others. Their safety and education are paramount to any of your profit motives. Secondly, I  
ME-2 challenged you all on the lack of a verifiable needs assessment for this Assisted Living and Memory Care facility, which was based on marketing predictions, not otherwise substantiated. The cost alone of living at this campus makes occupation prohibitive for the median income of Beach Cities residents, to which you replied, in effect, were not really your target population; ANYONE WHO COULD PAY YOUR PRICE WERE WELCOME, adding to the WEALTH DIVIDE that  
ME-3 already is in question by our Governor for affordable housing, so much so that our Governor has made it incumbent upon the City of Redondo Beach to prove that they are not just planning, but IMPLEMENTING 2500 affordable housing units within our boundaries. Your Healthy Living Campus defies this mandate. Nor do you care. All along your profit motive has been clear as your driving force.

ME-4 Further, you cannot justify building your FOR PROFIT H.L.C. on land zoned for a Public Community Facility, P-CF, which zoning is delegated for use by local governments to build facilities for hospitals, fire or police stations, schools, park/recreation -a designation purposed for the "common good of the ENTIRE community", not a privileged few who can pay the \$12,000. minimum/month for assisted living/memory care. You could, however, choose to augment community services for the majority of seniors in the area who want to "age in place", through grant money BCHD has an eye for, so that they, myself included, can "age in place" with some additional in home health services extended to us at a reasonable rate. I include other salient points for your consideration below.

Mary R.Ewell, M.F.T.  
Redondo Beach, District 2

RCFE is clearly Incompatible with surrounding neighborhoods. Its placement on the extreme perimeter of the property, combined with the proposed scale and mass causes the most damage to surrounding neighborhoods.

ME-5 Violates General Plan land use policies for cities of Torrance and Redondo Beach municipal code to be "compatible in scale, mass, and character with surrounding neighborhoods".

- Torrance General Plan Policy LU.2.1. "Require that new development be visually and functionally compatible with existing residential neighborhoods..."
- Torrance General Plan Policy LU.3.1. "Require new development to be consistent in scale, mass and character with structures in the surrounding area"

- Redondo Beach General Plan Policy 1.46.4. "... 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."

ME-5  
(cont.)

Single family homes surround the site as close as 80 ft. from proposed structures to the East, West, and South with up to a 30 ft. height limit. To the North by Residential RMD and Light Commercial C-2, both with 30-foot height limits. RCFE is built out to the edge of the property on a 30 ft. bluff, with properties to the East situated another 60 ft. below grade. It will:

- Cause significant damage to blue sky views and major privacy issues.
- Subject residents to significant glare and night-time lighting of the 24/7 operations facility. DEIR provides no substantive analysis of impact.
- Create shadow effects that are significant to Torrance homes to East, Towers Elementary school and Redondo Beach homes to the North.

Key viewing locations (KVLs) are flawed and deceptive. Main KVL from 190th and Flagler used to justify mitigation of reduction of 20 ft. height is flawed.

- Viewing location is deceptive, one of the few viewing locations where the project site appears to be lower than street level, rather than elevated 30 ft. above street level to the East.
- View of PV Ridgeline from this viewing location is not representative of views Not the highpoint as stated

ME-6

Responsible Agency - City of Torrance was not consulted on key viewing locations, as stated in their response to the DEIR. New KVLs from the city of Torrance must be provided with city input. Nor were the Torrance residents East of the proposed H.L.C invited to any of the BCHD "scoping meetings" until their was a public outcry. Why? They are the most impacted by this proposal.

ME-7

Phase 2 realistic photo-simulations are completely missing. Thus impacts of the whole project is never shown or can be analyzed. DEIR states: "maximum building footprints and maximum building heights" of Phase 2 are addressed in the DEIR.

ME-8

### **Request**

DEIR is deficient and missing information and visual aids necessary for agencies and the public to make reasonable assessments. Substantial setbacks and reduction of height would help mitigate damage to neighborhoods. Provide photo-visualizations and other physical visual aids such as silhouettes, poles, flag banners showing proposed height and mass of structures for Phase 1 and Phase 2. Provide new key viewing locations consulting with the City of Torrance as requested. Detailed health impacts are not presented and are completely absent in regards to glare and nighttime lighting, and

ME-9

ME-10

ME-10  
(cont.)

shadow effects on surrounding Redondo Beach and Torrance neighborhoods, and Towers Elementary school.

ME-11

DEIR should be recirculated to provide adequate time for the agencies and the public to review and provide comments.

## Hazards and Hazardous Materials

BCHD plans to:

- Demolish the 514 building (old South Bay hospital) which contains lead, mold, asbestos, and other contaminants.
- Excavate, grade and trench more than 31,000 cubic yards of soil, containing significant amounts of PCE.

According to the DEIR:

ME-12

"Soil disturbance during excavation, trenching, and grading at the Project site would result in the disturbance of potentially contaminated soil. Ground disturbing activities (e.g., excavation, trenching, and grading) during Phase 1 and Phase 2 would disturb PCE-contaminated soils, beginning with the excavation of the subterranean levels of the RCFE Building to a depth of 26 feet during Phase 1. Similarly, grading within the vacant Flagler Lot would also encounter PCE-contaminated soils. The soil samples on the vacant Flagler Lot ...had the greatest concentrations of PCE on the Project site (Converse Consultants 2020; see Appendix G). "

The selection of boring sites is inadequate. The only 30 foot boring, at B-1, which was known to be far away from where the main contaminants were found, seemed a deliberate attempt to avoid finding more contaminants which were almost certain to be found with proper investigation and greater study. Converse [Ref: 3.2.38] advised unequivocally: "Deeper borings in the locations where pollutants were found would yield even greater findings of more pollutants."

### ***Requested Action***

Additional deeper borings and analysis should be done on the construction site. The fact that the PCE was found in 29 of 30 samples throughout the site shows it is widespread, often found far from its potential original source, and is likely spreading deeper and downhill the slope from its origins.

ME-13

Study the impact of natural occurrences such as heavy rains and winds, as well standard mitigations and human error or occasional noncompliance the appropriate guidelines. What are the ramifications or penalties for noncompliance. Specify who is held accountable and pays fines? The BCHD, the City of Redondo Beach, the developer? More information is needed on watering down of construction debris, contaminated soils, etc. and its impact on streets like Beryl and Flagler which are downstream and in close proximity to homes and Towers Elementary. Provide analysis for the stormwater drain system and spread to water conservation/nature preserves to the lower elevations in the East such as Entradero Park in Torrance.

## Air Quality

DEIR states Air Quality impact is “less than Significant with mitigation”.

“However, on-site construction-related emissions would exceed the SCAQMD localized significance thresholds (LSTs) for respirable particulate matter (PM10) and fine particulate matter (PM2.5) as they affect off-site receptors. “

The project would create air quality hazards, diesel particulates and fugitive dust known to be health hazards, even with mitigation measures. Throughout the DEIR, Mitigation plans are not sufficiently discussed nor safeguards detailed adequately. MM AQ-1 “would require watering of exposed surfaces three times daily....and prohibiting demolition when wind speed is greater than 25 miles per hour (mph).”

The mitigation plan only accounts for prohibiting demolition during wind events greater than 25 mph. It does not account for potential ineffectiveness of mitigations from loading up of demolition debris, excavation of 30,000 cubic yards of soil with known toxic substances such as PCE, and concrete grinding onsite, etc. with intermittent wind speeds at 25 mph and higher. For instance in March 2021, wind speeds were measured at 45 mph on the lower site adjacent to the construction site. This wind speed was enough to topple the Shell Station: <https://losangeles.cbslocal.com/video/5397491-wind-blows-off-gas-station-canopy-at-redondo-beach-shell-station>.



## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:11 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Mammoth project in Redondo & Torrance.

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**From:** Mary Gaye <mgmcgahan@gmail.com>  
**Sent:** Sunday, April 18, 2021 12:43 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Mammoth project in Redondo & Torrance.

MG3-1 The residents here, sayNO!! To the BCHD .this is not wanted by the residents, five plus years of noise, air pollution, grid lock. This neighborhood does not need  
A residential living , for the wealthy, we need our neighborhood,and schools to be protected.  
SO NO NEVERFOR YOUR MASSIVE PROJECT

Sent from my iPad

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:42 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD

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**From:** Mary Gaye <mgmcgahan@gmail.com>  
**Sent:** Wednesday, June 9, 2021 1:53 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** BCHD

MG4-1 | BCHD, Needs to go back to the drawing board. The residents of Redondo Beach, and Torrance, have made very clear they are against the huge project as it stands. The beach Cities "unhealthy" plan needs to go. the residents in the area do not want or need a Assisted living for the wealthy,

Sent from my iPad

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:20 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Healthy Living Campus

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-----Original Message-----

From: Mary Watkins <327marywatkins@gmail.com>  
Sent: Saturday, May 1, 2021 5:51 PM  
To: Communications <Communications@bchd.org>  
Subject: Healthy Living Campus

MW1-1 | I am writing to voice my opposition the the proposed changes to the former South Bay Hospital property.

MW1-2 | This parcel is designated public land and no additional commercial enterprises should be allowed there.

MW1-3 | Traffic has been notably and adversely impacted since the opening of the Silverado building some years ago; additional construction would add to the problem. Air pollution during construction, and noise pollution due to additional traffic and events so close to residential neighborhoods and a school would increase and continue for generations.

MW1-4 | Because of the change of purpose for land use, and the magnitude of the construction, this project should be approved by a majority of the voters of Redondo Beach, Hermosa Beach and Manhattan Beach before being implemented.

Mary Watkins  
401 N. Lucia Ave.  
Redondo Beach CA 90277

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:40 PM  
**To:** Meisinger, Nick  
**Subject:** Fw:

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**From:** marinafinearts@aol.com <marinafinearts@aol.com>  
**Sent:** Tuesday, June 8, 2021 6:34 PM  
**To:** EIR <eir@bchd.org>  
**Subject:**

MLW-1 | Please stop this overly done BCHD project. It is way to massive for the neighborhood and will have a very negative effect on the immediate community. My wife and I both are strongly opposed to the project as proposed. PLEASE STOP IT !!!  
Mike and Laura Woolsey  
Tomlee AVE residents

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 11:33 AM  
**To:** Meisinger, Nick  
**Subject:** Fw: Healthy Living Campus Draft EIR Comments

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**From:** mike & jill <jammer.1@verizon.net>  
**Sent:** Tuesday, March 23, 2021 9:47 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Healthy Living Campus Draft EIR Comments

As a citizen of Redondo Beach, I have three concerns regarding the Beach Cities Health District Healthy Living Campus Master Plan.

My first concern is the construction noise that the surrounding Redondo Beach and Torrance residential neighborhoods will be asked to endure for 29 months during the Phase 1 construction, plus 28 months during Phase 2 construction, a total of 57 months, almost five years. The Draft EIR characterizes the noise impact as "Significant and Unavoidable". This five-year impact to the quality of life of hundreds of Redondo Beach and Torrance neighbors is directly counter to the Beach Cities Health District charter to promote the health and well-being of its citizens.

My second concern is the negative visual impact of the proposed main building, whose large height and volume are inconsistent with the surrounding residential neighborhoods. The "before and after" renderings on the Draft EIR pages 3.1-35, 3.1-41, 3.1-43, 3.1-44, and 3.1-46 clearly show the proposed structure will dominate the neighborhood view. This impact is caused by the proposed structure having a height of 103 feet above ground level, which is quite significant when compared to the 30' height restriction of residential buildings in the surrounding Redondo Beach neighborhoods. The negative visual impact is exacerbated by the proposed structure being situated close to the northeast corner of the site boundary, unlike the existing building, which is set back from the site boundaries. There is no doubt that the local residential neighbors, some who are only 80' away from the site, will be dramatically affected. The visual impact will not be limited to the immediate neighbors. I have assessed that the proposed building will be quite visible from my home located about a mile away. Again, the quality of life of hundreds of Redondo Beach and Torrance citizens will be negatively affected.

Therefore, I call upon the Redondo Beach Planning Commission to impose building height and size restrictions consistent with the surrounding neighborhood zoning that would normally be imposed upon any commercial venture.

My third concern is the most distressing: This public-private joint venture is going to cause a conflict of interest between the Beach Cities Health District, a public agency working for the good of its citizens, and the corporate partner, which is ultimately motivated by profit. The large size of the proposed building is motivated by having enough corporate profit to justify the private investment. This joint venture is only going to be 20% owned by the public. The for-profit corporate partner would own 80% of the joint venture. This joint venture would be the end of the BCHD as we know it. This project will effectively transform BCHD into a for-profit organization.

There are viable financial alternatives to this outlandish project. These alternatives include:

- 1) Reducing the BCHD yearly operating expenses from \$14M to \$10M to accommodate the \$3.8M loss of lease revenue. My review of the published BCHD budget identified potential reductions of \$1.5M for facility expenses, \$1.8M for professional services expenditures, and \$0.5M for community relations, a total savings of \$3.8M, which would balance the budget.
- 2) Selling some or all of the 11 acres of property to either fund BCHD yearly activities, or the build of the new Wellness Facility, Aquatics Facility, and Health and Fitness Facility. At current market rates, the land is worth over \$60M if developed under Redondo Beach residential zoning guidelines.
- 3) Proposing a reasonable bond to the citizens of the Beach Cities to fund the development of the above facilities, while retaining the 11 acres of land as a new public park dedicated to health and fitness.

If forced to choose between the Draft EIR Alternatives, I recommend the "No Project" alternative. A final alternative, although drastic, is also viable: Dissolve the BCHD and disburse the BCHD assets to the cities of Redondo Beach, Hermosa Beach, and Manhattan Beach.

Mike Jamgochian  
Redondo Beach

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 11:59 AM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD EIR comments

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---

**From:** Mike Patel <mpatel021@gmail.com>  
**Sent:** Monday, April 5, 2021 11:15 AM  
**To:** EIR <eir@bchd.org>  
**Subject:** BCHD EIR comments

MP-1 | Hello this email is in regards to supporting the concept of this project, but only if it is downsized by 30%. The impact of noise, traffic, etc for the area will be tremendous. There are three schools nearby as well in which will be impacted, let alone the residences in the area. I live near Diamond/Lucia and will be driving through the haul routes as well, thus I feel  
MP-2 | if the project was reduced in size it could be a win/win for the residences and developer, and despite the cost of development etc, the developer on a reduced project will be still making money, but greed cannot dictate the happiness and safety of our neighborhood. Thank you.

--

Mike Patel  
South Redondo Beach Resident.  
email: [mpatel021@gmail.com](mailto:mpatel021@gmail.com)



## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:14 PM  
**To:** Meisinger, Nick  
**Subject:** Fw:

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**From:** marinafinearts@aol.com <marinafinearts@aol.com>  
**Sent:** Wednesday, May 26, 2021 5:13 PM  
**To:** EIR <eir@bchd.org>  
**Subject:**

MW2-1 | I live on tomlee ave behind the south bay hospital. I am 100% opposed to the development on the corner of Flagler lane and Beryl Ave by BCHD. It is NOT in the best interest of the community.  
Mike Woosley

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:26 PM  
**To:** Meisinger, Nick  
**Subject:** Fw:

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**From:** marinafinearts@aol.com <marinafinearts@aol.com>  
**Sent:** Thursday, June 3, 2021 8:52 AM  
**To:** EIR <eir@bchd.org>  
**Subject:**

MW3-1 Hello, I am strongly opposed to the proposed BCHD project. I live on Tomlee Ave and the scale and scope to way to large for the community. The development would loom over our street and be a tremendous eye sore and block our view of the westward sky. Pease reject this project.  
Mike Woolsey

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:31 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Against BCHD

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**From:** Alanna Cater <photolove821@gmail.com>  
**Sent:** Tuesday, May 11, 2021 10:05 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Against BCHD

MT1-1 | My daughter attends Towers Elementary and I'm against this project. It will cause distraction in the school,dust, traffic,  
etc...  
Please stop this project.

Sincerely,  
Mirna Trujillo

Sent from my iPhone

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:25 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Stop BCHD

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**From:** Mirna Trujillo <mirnatrujillo16@yahoo.com>  
**Sent:** Wednesday, June 2, 2021 2:30 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Stop BCHD

MT2-1 | I demand that you stop BCHC.

Mirna

[Sent from Yahoo Mail for iPhone](#)

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 11:58 AM  
**To:** Meisinger, Nick  
**Subject:** Fw: No to over development in my city

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**From:** naomi onizuka <kimonojyuku@icloud.com>  
**Sent:** Sunday, April 4, 2021 4:24 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** No to over development in my city

To whom it may concern,

NO-1 No to over development in Torrance and Redondo. I do not approve or consent to this development. As a long term resident of Torrance and a senior myself there are already enough residential living choices. This is not needed and wanted. This will ruin our beautiful city and bring even more unwanted noise and construction that's isn't needed. As a high tax paying residents in Torrance this is ridiculous.

NO to over development

Regards  
Redondo beach resident.

Sent from my iPhone

**Navarro, Ashlyn**

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:59 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Proposed BCHD Project

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**From:** Pam Absher <pamabsher@yahoo.com>  
**Sent:** Thursday, June 10, 2021 4:54 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Proposed BCHD Project

I have previously stated my objection to this project. It is too large and my tax dollars should not be used to build an unaffordable facility for South Bay seniors. The project is bloated, it is going to impact my drive on Prospect both during and after the completion of the project, and it uses a 10 acre parcel to benefit few.

Tom Bakaly states BCHD provides services to the public, yet none of my friends or family use the facilities. The DEIR was defective and must be fixed and recirculated to the public.

I am once again stating I oppose this project.

Sincerely,

Pam Absher

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:33 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD Project

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---

**From:** Patricia L Brown <cluster.1961@yahoo.com>  
**Sent:** Saturday, June 5, 2021 12:00 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** BCHD Project

PB-1 I am a long-time resident (60 years) of Redondo Beach. I live on the border of Cluster Lane and 190<sup>th</sup> Street. I would like to express my opposition to the proposed project that would build a high-end assisted living facility where Silverado currently exists and where pricing currently begins at approximately \$10K per month, per person. At that cost, only the affluent are able to afford Silverado. The new facility is projected to cost even more per person. That means only the VERY affluent will be able to afford to live there.

PB-2 The construction is projected to take at least 5 years to complete. 5 years of noise, traffic, pollution, potentially unsafe emissions to the environment and the very air I breathe. I am 81 years old and live close enough to the potential construction site that I can envision 5 years of keeping my windows closed and avoiding time I now spend enjoying my beautiful patio with family and friends. I don't have that many more years left to enjoy the home I love and have taken care of for more than half a century.

PB-3 Finally, my own health and comfort is but one inconvenience. Many other long-time Torrance and Redondo residents will be impacted, including residents with small children, as well as Towne Avenue Elementary School where, for 5 years, children may be exposed to currently unknown and possibly harmful emissions from this project.

PB-4 It seems to me this project is simply a money maker for the builder/owner of this new, and more expensive, assisted living facility. We already have an existing, perfectly acceptable and lovely, facility called "Silverado."

I vehemently oppose this project.  
Patricia L. Brown

Sent from [Mail](#) for Windows 10



## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:09 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Don't build this monstrosity....!!!!!!

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**From:** Patrick Wickens <patwickens@verizon.net>  
**Sent:** Tuesday, April 13, 2021 6:22 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Don't build this monstrosity....!!!!!!

This is completely stupid.....it will bankrupt the BCHD and we property taxpayers in Redondo, Hermosa and Manhattan will be on the hook .....

It will only benefit Bakaly and his top ten henchmen who will be paid their \$250,000 plus yearly salaries for five to ten years of construction....then the private investor will own the property....

It is just a big scam and no millionaire will spend \$12K a month to live on the eastern border of Redondo and Torrance when they can live in Newport Beach or Malibu...

I have lived in the neighborhood since 1985 and watched the BCHD slowly be mismanaged into oblivion

The Board should resign (except for newly elected Dr. Koo) and Bakaly and his henchmen should be fired !

## Navarro, Ashlyn

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:56 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Comment on BCHD Project and Draft EIR ...

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**From:** Paul Schlichting <pschlichting@earthlink.net>  
**Sent:** Thursday, June 10, 2021 3:41 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Comment on BCHD Project and Draft EIR ...

Dear EIR Comments at BCHD,

I am writing to oppose the current BCHD assisted living project on the site of the current BCHD facilities on Prospect south of Beryl. This is BAD for the community, and BAD for the City of Redondo Beach...

1) This is an absolutely MASSIVE project that has no place in that local environment. The current facilities are adequate for purposes currently used, and general BCHD uses.

2) This WILL NOT benefit the community. In fact, the recent Kensington (for profit) project is a perfect example of doing this for all of the wrong reasons:

2a) It is priced WAY out of the range of virtually ANY local Redondoans. Therefore, only the wealthiest people/families will be able to take advantage of such a facility - 90-95% from outside Redondo Beach.

2b) The Kensington was recently a harbor for an early local COVID-19 breakout, with disastrous results. I understand that they even didn't have to disclose any further statistics after the initial reporting.

We do NOT need another such secretive "petri-dish" in our neighborhoods - especially one many times larger than the Kensington.

2c) The Kensington took over a school site that Superintendent Steven Keller promised would NEVER need to ever be used in Redondo Beach. Although the community indicated that it did NOT want

this project, both the School Board (with Keller's blessing) and the Redondo Beach Planning department promoted this use, even though it was currently being used by a school and other city

and other government-related uses. The current BCHD site is in use - pretty much fully (except for some COVID-period reduction - experienced all over) by my visits and estimation.

3) All of the impacts on the local infrastructure - roads, sewers, water, power, traffic, and other facilities - will be impacted, with much of the slack having to, likely, be taken care of by the local population.

4) The DEIR apparently has many flaws in its reporting, and many, many others have expressed great concern with regards to the accuracy of its contents.

5) For any entity to "accept" the current DEIR, without having all objections properly and honestly addressed, could be tantamount to falsifying project impact documents and procedures.

BCHD has touted itself as a benefit to the local community - and I, by and large, agree with this to this point in time. In fact, I have personally taken advantage of some of the BCHD programs, and think that the organization, as is, can continue to provide benefits to the Redondo Beach community. However, if the choice is either this new facility or a loss of these services - I would opt for the loss of these services, as many of them already have competing programs and organizations in the local area.

Understand that the Redondo Beach Planning Department (aka "Community development") is historically NOT on the side of the community, as BCHD likes to claim that it serves. The Planning department is merely interested in incrementing the city's tax revenue, and would allow Marina del Rey -type development in the local area if they thought

- PS-6  
(cont.) that they could get away with it. They historically do not listen to, and actually ignore, arguments of projects' conflicts with policy and ordinances/law.
- PS-7 It appears that this is created to simply create income for the BCHD and its operations - with no real study nor analysis of how this might both benefit and harm the community. Again, THIS IS PRICED WAY OVER any local resident's ability to pay. This is NOT a proper motivation for this project, and many, MANY people will suffer because of it.
- PS-8 One other concern is the mere scope and impact of construction. This is a multi-(multi-) year project, and the disturbance to the local residences, businesses, and environment is incalculable - likely under-estimated if at all estimated.
- PS-9 If you feel that something like this is absolutely necessary, then it should be scaled down to a size that fits within the current structures currently on the campus. PLUS, it needs to be DEDICATED to the community - not simply the highest-paying entities who want such a home in the beach areas.
- Finally, you need to get acceptance from the local community - REAL ACCEPTANCE - not merely from bobble-heads who have their bread buttered on the same side as hyper-development in general, or as associated with those who do.
- Thank you very much for this opportunity to provide my input on this matter.
- Paul Schlichting  
South Broadway  
Redondo Beach, CA

## Margallo, Sydney

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 11:41 AM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Comments to be Read into the record

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Barbara Kiyokane <b.kiyokane@gmail.com>  
**Sent:** Wednesday, March 24, 2021 4:21 PM  
**To:** Communications <Communications@bchd.org>  
**Subject:** Public Comments to be Read into the record

PBK1-1 We strongly oppose the BCHD development because of its incompatibility with the surrounding Redondo Beach and  
PBK1-2 Torrance areas. It's insensitive to build such a monstrosity next to small quaint neighborhoods and a local elementary  
school. The proposed building is unsightly and the increased traffic will be a permanent nightmare.

Phil and Barbara Kiyokane

## Margallo, Sydney

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:27 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Comment to BCHD DEIR

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

---

**From:** Barbara Kiyokane <b.kiyokane@gmail.com>  
**Sent:** Thursday, June 3, 2021 2:09 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Public Comment to BCHD DEIR

PBK2-1 As residents of the neighboring Towers Street, we strongly oppose the planned Beach Cities Health District Senior Living Facility. We're concerned how this development will negatively impact our neighborhood's character, street traffic, and privacy.

PBK2-2 Beryl and Flagler Lane are currently small 2-lane roads, which border quiet residential neighborhoods. With Towers Elementary School nearby, these streets already experience traffic back-ups during various times of the day. We worry that the lack of thorough urban planning studies on the impact of this development, which will add 400+ additional residences plus employees and visitors, will put incredible strain on the surrounding streets and greatly reduce our ability to access our home.

PBK2-3 We're also concerned that the construction of this massive project will cause problems during its lengthy 5-year duration, resulting in health issues for our residents and local school children - the noise and traffic resulting in stress and lack of sleep; the dust and toxins blowing west resulting in eye and lung irritations. It would be negligent to ignore these likely outcomes.

PBK2-4 While we understand the need for assisted living facilities in our aging communities, your project needs to find a location that is accessible to and from major thoroughfares and not at the intersection of 2-lane roads where it will have a huge negative impact on its neighbors.

Sincerely,  
Phil and Barbara Kiyokane

## Margallo, Sydney

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:39 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD DEIR response

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** p4ew@aol.com <p4ew@aol.com>  
**Sent:** Friday, June 4, 2021 4:44 PM  
**To:** Communications <Communications@bchd.org>  
**Subject:** BCHD DEIR response

PHILIP DE  
WOLFF  
1408 Diamond  
str  
Redondo Beach

I am a resident of the above address, situated directly behind the existing BCHD building. In the Diamond street cul de sac. I wish to point out from my point of view from the first meeting with the board of BCHD that I felt that the dog and pony show that they put reminded me of the well known saying concerning the "selling of the Brooklyn Bridge". The seven houses on Diamond street were not even shown on the initial plan. I feel that the concern that the board said they showed for the neighborhood was all part of the show.

Now that we have reached this point where we are faced with years of construction and plans to construct a building that will block out our afternoon sun plus the planned removal of the green zone that has given us some feeling of living in a pleasant neighborhood, including the important mitigation of some of the air and noise pollution from Prospect street. The addition of a electric power sub station directly across the street in front of our houses is a contradiction of the "HEALTHY LIVING CAMPUS" which this new business venture has been named. High voltage is known to cause cancer

### THE DIAMOND STREET CUL DE SAC RESIDENCES

The fact that the seven houses on the Diamond street cul de sac are not mentioned or addressed in the DEIR, even though they are most probably going to bear the brunt of this business venture is a red flag in itself. This calls this DEIR to be re-evaluated as it omits a major impact on the residents of the houses in the Diamond str. Cul de sac. The cul de sac is on the south east side of the existing structure. The DEIR has mistakenly described the south west side of the BCHD as the south east side. So this DEIR is not valid as it is rife with errors.

### POLLUTION

The toxic runoff from the existing building site being a commercial site for 60 years and the known toxic dry cleaning fluid in the soil which will be part of the runoff, that and the dust from the construction site is not accounted for in the DEIR.

### LIGHT POLLUTION

At this time two of our bedrooms are flooded with light from the existing parking garage, with the proposed increase in size and height the light pollution will more than double.

### SIDE WALK TAKE OVER BY BCHD

The side walk opposite the houses on the Diamond Str cul de sac has been fenced into the BCHD property. If the new construction measurements are calculated without allowing for the 4 foot side walk than the plans are incorrect. The fence should be immediately removed and the four foot side walk be restored to the city as a public walk way. At this time anybody including all the school children from the high school are walking in the street, which is dangerous.

Sincerely,  
Philip de Wolff

## Margallo, Sydney

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:40 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD DEIR

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** R. Quan <rq23@yahoo.com>  
**Sent:** Tuesday, June 8, 2021 5:54 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** BCHD DEIR

Dear Board Members,

RPQ-1 We will make this as short as possible. Your proposed project is TOO BIG for the neighborhood. We strongly oppose this project!

Randy & Pamela Quan  
Torrance



## Margallo, Sydney

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 11:40 AM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Comments To Be Read Into The Record

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Reid Fujinaga <reid.fujinaga@gmail.com>  
**Sent:** Wednesday, March 24, 2021 4:58 PM  
**To:** Communications <Communications@bchd.org>  
**Cc:** PFurey@torranceca.gov; GChen@torranceca.gov; TGoodrich@torranceca.gov; MGriffiths@torranceca.gov; AMattucci@torranceca.gov; HAscraft@torranceca.gov; SKalani@torranceca.gov; CityClerk@torranceca.gov; AChaparyan@torranceca.gov; Vhoang@torranceca.gov; OMartinez@torranceca.gov; DSantana@torranceca.gov; FourthDistrict@bos.lacounty.gov; lieu.betty@tUSD.org; han.james@tUSD.org; gerson.jeremy@tUSD.org; muhammed.anil@tUSD.org; park.jasmine@tUSD.org  
**Subject:** Public Comments To Be Read Into The Record

RF-1 | I live on Ronald Avenue in Torrance, less than a quarter mile downwind from Beach Cities Health District, and strongly oppose any expansion of the existing campus. Neither my young children nor their classmates at Towers Elementary should be subjected to years of demolition and construction which will spew hazardous cancer-causing pollutants into the air. The mission of BCHD is to enhance community health, not to degrade it so that luxury senior housing can be built. I would think the BCHD Board of Directors, especially the three medical doctors, would be more focused on the health concerns of the neighbors, instead of developing real estate.

## Margallo, Sydney

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:07 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: WHY BCHD PROPOSED OVER-DEVELOPMENT MUST BE REJECTED: Too Big, Too Tall, Too Loud, Too Damaging, Too Expensive

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** ROBERT LEVY <levyrobert@me.com>  
**Sent:** Tuesday, April 13, 2021 6:48 AM  
**To:** Communications <Communications@bchd.org>; EIR <eir@bchd.org>  
**Subject:** WHY BCHD PROPOSED OVER-DEVELOPMENT MUST BE REJECTED: Too Big, Too Tall, Too Loud, Too Damaging, Too Expensive

RL-1

**WHY BCHD PROPOSED OVER-DEVELOPMENT MUST BE REJECTED:** Too Big, Too Tall, Too Loud, Too Damaging, Too Expensive

Property Tax Payer,  
-Robert Levy  
19314 Tomlee Avenue  
Torrance, ca 90503

Dictated but not read to prevent delay.

## Margallo, Sydney

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:05 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: California Public Record Act Request - Proposed BCHD 4kV Electrical Substation

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Rosann Taylor <rosanntaylor@mac.com>  
**Sent:** Tuesday, April 6, 2021 4:05 AM  
**To:** PRR <PRR@bchd.org>  
**Cc:** Geoff Gilbert <geoffgilbert2248@aol.com>  
**Subject:** California Public Record Act Request - Proposed BCHD 4kV Electrical Substation

To whom it may concern:

RTGG1-1

Our homes are directly across the street from the proposed BCHD electrical substation. We therefore make the following public records request:

Provide all documents associated with the proposed 4kV substation on Diamond east of Prospect, including but not limited to analysis of cancer causing impacts of EMFs of a 4kV transformer set 50 feet from occupied residential homes.

(E)Elec. Yard

Rosann Taylor  
1408 Diamond St.  
Redondo Beach, CA 90277  
[Rosanntaylor@mac.com](mailto:Rosanntaylor@mac.com)  
310-918-3409

and

Geoff Gilbert  
1406 Diamond St.  
Redondo Beach, CA 90277  
[geoffgilbert2248@aol.com](mailto:geoffgilbert2248@aol.com)  
310-505-4081

Aloha! 🙋❤️🌴

## Margallo, Sydney

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:27 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: California Public Record Act Request - Second Request Proposed  
BCHD 4kV Electrical Substation

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Rosann Taylor <rosanntaylor@mac.com>  
**Sent:** Wednesday, May 5, 2021 10:14 PM  
**To:** PRR <PRR@bchd.org>  
**Cc:** Geoff Gilbert <geoffgilbert2248@aol.com>  
**Subject:** California Public Record Act Request - Second Request Proposed BCHD 4kV Electrical Substation

To whom it may concern:

I am unable to find the requested information concerning the 4kV Electrical substation within the DIER.

I am asking that the District

Provide all documents associated with the proposed 4kV substation on Diamond east of Prospect, including but not limited to analysis of cancer causing impacts of EMFs of a 4kV transformer set 50 feet from occupied residential homes.

(E)Elec. Yard

Thank you in advance for providing this information.

Rosann Taylor  
and  
Geoff Gilbert

On Apr 30, 2021, at 10:56 AM, PRR <[PRR@bchd.org](mailto:PRR@bchd.org)> wrote:

Rosann,

Please see below for the District's response to your public records request dated 4/6/21 that reads:

To whom it may concern:

Our homes are directly across the street from the proposed BCHD electrical substation. We therefore make the following public records request:

Provide all documents associated with the proposed 4kV substation on Diamond east of Prospect, including but not limited to analysis of cancer causing impacts of EMFs of a 4kV transformer set 50 feet from occupied residential homes.

(E)Elec. Yard

**Response:** Please reference the Draft Environmental Impact Report that can be found using the below link:

<https://www.bchdcampus.org/deir>

If you have further comment, please submit to [EIR@bchd.org](mailto:EIR@bchd.org) and a written response will be provided following the end of the public comment period on the Draft EIR.

**Covid-19 disclaimer:**

Please also note that the District is currently operating under its emergency protocols, which require reallocation of resources to meet the critical needs of the community at this time. As a result, the District's responses to certain public records requests may require more time than normal. We apologize for the inconvenience and are committed to working with the public to provide all requested information as soon as reasonably possible.

Thank you.

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**From:** PRR <[PRR@bchd.org](mailto:PRR@bchd.org)>

**Sent:** Friday, April 16, 2021 2:56 PM

**To:** Rosann Taylor <[rosanntaylor@mac.com](mailto:rosanntaylor@mac.com)>

**Cc:** PRR <[PRR@bchd.org](mailto:PRR@bchd.org)>

**Subject:** California Public Record Act Request - Proposed BCHD 4kV Electrical Substation - Initial Response

Rosann,

Please see below for the District's response to your public records request dated 4/6/21 that reads:

To whom it may concern:

Our homes are directly across the street from the proposed BCHD electrical substation. We therefore make the following public records request:

Provide all documents associated with the proposed 4kV substation on Diamond east of Prospect, including but not limited to analysis of cancer causing impacts of EMFs of a 4kV transformer set 50 feet from occupied residential homes.

(E)Elec. Yard

The District reviewed your request and requires additional time to gather, review and respond to the request. The District has determined that the 10-day time limit to determine whether your request seeks disclosable public records in the possession of the District is **hereby**

**extended by 14 days to 4/30/21** for the following reason: The need for consultation with other agencies having substantial interest in the determination of the request and/or among two or more components of our agency having substantial subject matter interest therein.

**Covid-19 disclaimer:**

Please also note that the District is currently operating under its emergency protocols, which require reallocation of resources to meet the critical needs of the community at this time. As a result, the District's responses to certain public records requests may require more time than normal. We apologize for the inconvenience and are committed to working with the public to provide all requested information as soon as reasonably possible.

Thank you.

---

**From:** Rosann Taylor <[rosanntaylor@mac.com](mailto:rosanntaylor@mac.com)>

**Sent:** Tuesday, April 6, 2021 4:05 AM

**To:** PRR <[PRR@bchd.org](mailto:PRR@bchd.org)>

**Cc:** Geoff Gilbert <[geoffgilbert2248@aol.com](mailto:geoffgilbert2248@aol.com)>

**Subject:** California Public Record Act Request - Proposed BCHD 4kV Electrical Substation

To whom it may concern:

Our homes are directly across the street from the proposed BCHD electrical substation. We therefore make the following public records request:

Provide all documents associated with the proposed 4kV substation on Diamond east of Prospect, including but not limited to analysis of cancer causing impacts of EMFs of a 4kV transformer set 50 feet from occupied residential homes.

(E)Elec. Yard

Rosann Taylor  
1408 Diamond St.  
Redondo Beach, CA 90277  
[Rosanntaylor@mac.com](mailto:Rosanntaylor@mac.com)  
310-918-3409

and

Geoff Gilbert  
1406 Diamond St.  
Redondo Beach, CA 90277  
[geoffgilbert2248@aol.com](mailto:geoffgilbert2248@aol.com)  
310-505-4081

Aloha! 🙋❤️🌴

## Margallo, Sydney

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:53 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Topics 4kV Electrical Substation, Tree removal, Diamond cul de sac green buffer

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Rosann Taylor <rosanntaylor@mac.com>  
**Sent:** Thursday, June 10, 2021 1:53 PM  
**To:** EIR <eir@bchd.org>  
**Cc:** Geoff Gilbert <geoffgilbert2248@aol.com>  
**Subject:** Topics 4kV Electrical Substation, Tree removal, Diamond cul de sac green buffer

To whom it may concern:

Please include in the environment impact an analysis the cancer causing impact of the EMF's of the proposed 4kV transformer set 50' from occupied residential homes on the Diamond culdesac. This is not addressed in the DEIR or in public records per your response to my request for public records.

RT-1

I would like the planners to consider moving the electrical yard to a part of the property where it is least likely to affect our health.





### Removal of trees

If 20 trees are to be removed to build this substation, then approximately only 3 trees will be left on the current hillside.

### Preservation of the hillside buffer

Consider in the EIR the visual impact and biological impact of removing trees to the residents on the southwest border of the property whose front yards face directly into the BCHD property. The picture shown above portrays lush trees and landscaping on the hillside. If this is the plan, please include it in the written documentation.

Whether the electrical yard is to be positioned on this hillside or not, it is important to maintain (and enhance) the green buffer between the residents who live on the Diamond culdesac and the BCHD. Trees and landscaping will mitigate the visual impact, create beauty, help reduce noise and light pollution, provide privacy, help keep the air clean as well as provide good will between the BCHD and their closest neighbors.

Thank you for your consideration of these concerns.

Rosann Taylor

Copy of public records request correspondence:

Begin forwarded message:

**From:** PRR <PRR@bchd.org>

**Date:** May 17, 2021 at 5:45:22 PM PDT

**To:** Rosann Taylor <rosanntaylor@mac.com>

**Cc:** PRR <PRR@bchd.org>

**Subject: California Public Record Act Request - Second Request - Proposed BCHD 4kV Electrical Substation - Response**

I am asking that the District

Provide all documents associated with the proposed 4kV substation on Diamond east of Prospect, including but not limited to analysis of cancer causing impacts of EMFs of a 4kV transformer set 50 feet from occupied residential homes.

(E)Elec. Yard

The District has reviewed your request and has not identified any documents that are responsive.

Your above request has also been forwarded to the EIR mailbox and a written response will be provided following the end of the public comment period on the Draft EIR.

## Margallo, Sydney

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:08 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: 2021 BCHD Commercial Building Plan

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**From:** Men Valeriano <menvaleriano@yahoo.com>  
**Sent:** Tuesday, April 13, 2021 8:36 AM  
**To:** Communications <Communications@bchd.org>  
**Subject:** 2021 BCHD Commercial Building Plan

RV-1 | NO to this revised proposal. This has gotten out of hand. We have to protect our city from noise, pollution & traffic. We  
RV-2 | the residents want to maintain the character of our beach city.

Rose Valeriano  
Beryl Heights resident

[Sent from Yahoo Mail for iPhone](#)

## Margallo, Sydney

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:54 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: DEIR Comment from an Immediately Adjacent Neighbor

**CAUTION:** Ex\*el\*age aig gease dñ kñ\* ġ k ñk ġkks/a\*\*ā h ek\*s ġ kġess yñ kññw \*he~ ñk\*ek\* is gek ġ ike akd safe.

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**Sent:** h ġ day! ' ġ ke # \$! % % # & \$( )  
**To:** E\*+ <eiŭ@D hd.ñġ>  
**Subject:** , E\*+ - ñ ek\* fŭñ ak \* edia\*ey . d/ā ek\* 0 eighDñŭ

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hak k yñ !  
aDŭka Keŭ h

## Margallo, Sydney

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:27 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Comment to BCHD DEIR

**CAUTION:** Ex\*el\*age aig gease dΩ kΩ\*~ g' k Ωk gkks/a\*\*ā h ek\*s\_ k gess yΩ kkΩw \*he~ Ωk\*ek\* is gek\_ ike akd safe.

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**From:** sakgaŭa <sakgaŭa\_a@yahoo.~ Ω >  
**Sent:** Th\_ Ūday !\_ ke " # \$ % & ( ) \* +  
**To:** E,- <eiŪ@.~ hd.ΩŪg>  
**Subject:** \_ . g' / Ω ek\*+Ω 0/12 2 E,-

- SK2-1 I am resident of Torrance and I oppose BCHD's attempt at this supersized project. The sheer size and visual impact of the project in no way fits this West Torrance and Redondo Beach neighborhood. The DEIR does not
- SK2-2 adequately address all the other options that the project could take to minimize its impact to the neighborhood,
- SK2-3 such as building closer to the west side of the project, or building lower into the land. The construction dust,
- SK2-4 noise, trucks hauling materials to and from the site, would create a massive disturbance to a quiet neighborhood.
- Such a massive project does not fit into this neighborhood.

Sang Kim  
sangarama@yahoo.com  
310-257-1197



## Margallo, Sydney

---

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:04 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: PRR

**CAUTION:** Ex\*ēŪkage aīg ǵeāse dŌ kŌ~ ǵ k Ųk ǵkks/a\*\*ā h ek\*s ǵ kǵess yŲ kkw \*he~ Ųk\*ek\* is gek ǵ ike akd safe.

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**From:** sheigā Ųā b <sheigawǵā b@g aīg Ų >  
**Sent:** Ūday! " #Ūǵ\$! \$%&' ( ' ) \*  
**To:** ++ < ++@b̄ hd.ŲŪǵ>  
**Subject:** ++

To Whom It May Concern:

Please provide information regarding the following:

A stated objective of the BCHD project is "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."

1. Provide all analyses forecasting the future health needs of Beach Cities residents.
2. Provide all analyses forecasting the cost of future health needs of Beach Cities residents.
3. Provide all studies and forecasted BCHD revenue requirements for future health needs of Beach Cities residents.
4. Provide all current demand for meeting spaces and interactive education for Beach Cities residents.
5. Provide all studies and forecasted future demand for interactive education and meeting spaces for Beach Cities residents.

Sheila W. Lamb



## Margallo, Sydney

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:04 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: PRR

**CAUTION:** Ex\*el\*age aig gease dñ kñ~ g k ñk gkks/a\*\*ā h ek\*s\_ kßss yñ kñw \*he~ ñk\*ek\* is gek\_ ike akd safe.

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**From:** sheila W. Lamb <sheilaw@bchd.org>  
**Sent:** Friday, June 18, 2021 1:00 PM  
**To:** ++ <++@bchd.org>  
**Cc:** \* aig, eñk -. ñ e / aig <ekesñk@bchd.org>  
**Subject:** ++

To Whom It May Concern:

The DEIR states that BCHD provides direct services to 123,000 Beach Cities Residents. Please provide information on the name and type of direct services that BCHD delivered to Beach Cities residents in 2020. Please include number of unduplicated residents who received these services.

Thank You,

Sheila W. Lamb

## Margallo, Sydney

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:08 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: DEIR Comments 4/13/2021

**CAUTION:** Ex\*elūage aig ġeāse dŋ kŋ\* ġ k ŋk ġkks/a\*\*ā h ek\*s ġ kġess yŋ kkw \*he~ ŋk\*ek\* is gek ġ ike akd safe.

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SL3-1 **Section 2.25 Existing Land Use Designation:** The DEIR misleads the public by omitting the Redondo Beach Municipal Code zoning definition of P-CF and its permitted uses. P-CF Zone=Public Community Facility with the following permitted uses: parks, parkettes, open space, recreational facilities, beaches and coastal bluffs. The P-CF Zone is intended for land development that serves the public not commercial enterprises such as senior housing.

SL3-2 **Section 2.4 Project Objectives:** The DEIR misleads the public by mischaracterizing the scope and reach of BCHD programs and services. According to BCHD's own Gallup Survey only 9% of Beach Cities residents have participated in 3 or more BCHD activities. Aside from participating in the LA County Covid 19 testing/vaccinations, BCHD has no evidence to support the provision of direct services to 123,000 Beach Cities residents.

SL3-3 **The BCHD Project is Too Tall for the Adjacent Neighborhood -** The proposed project is 133-1/2 feet above street level and significantly contrasts with the 30 foot tall residential buildings adjacent to the project. The project intrudes on the surrounding neighborhood by blocking views of the Palos Verdes hillside, blocking the blue sky view for neighbors, casting shadows in surrounding areas and invades privacy in homes and yards for a one-half mile radius.  
**The BCHD Project is Too Big for the Adjacent Neighborhood -** BCHD is proposing a development that is roughly the size of South Bay Galleria or Staples Center, it is 2-1/2 times the size of the current buildings and it is located in the middle of a low density residential area of single family homes.

SL3-4 **The BCHD Project is a Commercial Enterprise Intended for 80% Non Residents of the 3 Beach Cities**  
- BCHD is chartered and funded to serve the residents of Hermosa, Manhattan and Redondo Beach. According to BCHD's own consultants, less than 20% of tenants of the facility are expected to be from all 3 beach cities together. The facility is being developed for outsiders while all the environmental damages will be shouldered by the surrounding neighborhood residents who's quality of life will be negatively impacted during construction and ongoing operations of the facility.

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. edŋkdŋ Ōeā h . esidek\*

## Meisinger, Nick

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 9:57 AM  
**To:** Meisinger, Nick  
**Subject:** Fw: DEIR Comments  
**Attachments:** Comments to DEIR-682021.pages

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Sheila Lamb <sheilawlamb@icloud.com>  
**Sent:** Wednesday, June 9, 2021 5:30 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** DEIR Comments

Please see attached document. Please let me know if you need a PDF of this document.

Sheila W. Lamb

DEIR Comments  
Proposed BCHD Development  
Sheila W. Lamb  
sheilawlb@gmail.com

## **EXECUTIVE SUMMARY**

### **ES-2 Project Objectives**

*Project Pillars:* The project objectives are based on three project pillars: Health, Livability, and Community. BCHD has shown no evidence that it has the capacity to execute its project pillars as described below:

#### **Health-**

- BCHD has no basis or evidence on which to claim that it is or can be a center of “excellence on wellness, prevention, and research.”
- BCHD has provided any evidence that there is a need to expand its community health programs or that its current programs improve health.

#### **Livability**

- BCHD has shown no evidence that it has identified any emerging technologies, innovation or novel ways to access health services.
- BCHD has shown no evidence that it currently operates or has the ability to operate an intergenerational hub of well-being.

#### **Community**

- BCHD proposes a continuum but there is no evidence that the proposed development is needed to implement those services.

### **Project Objectives**

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

As a public entity, BCHD has not satisfactorily demonstrated that this development will in fact generate sufficient revenue, that its services are needed by the community, that there are

SL4-1  
(Cont.)

community health needs that BCHD has identified, that there is a need for high end assisted living facilities, or that it has identified future community health needs. The range of project alternatives is based on project purpose and objectives but BCHD shows no evidence of ability to execute its purpose and objectives. In addition, two of five alternatives rely on maximizing revenue which is too narrow an objective and future revenue generation cannot be sufficiently substantiated. All of these issues impact the consideration for the choice of alternatives. Alternative six, as the reduced size alternative should be evaluated for its comparative merits for the reason that the Project Objectives are insufficiently demonstrated to be operationally realized.

SL4-2

#### ES-5 Alternative Analysis

SL4-3

CEQA Guidelines state that an “*EIR shall describe a range of reasonable alternatives to the proposed project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives*”

The Draft EIR states that it evaluated all six alternatives but Table ES-2 and 5.5.-5 do not show the impact comparison of alternative six. To adequately evaluate the “comparative merits” of the project, the DEIR must include alternative six.

## **2.0 PROJECT DESCRIPTION**

### **2.2.5 Existing Land Use Designations and Zoning**

SL4-4

The DEIR states that permitted uses under the P land use designation in the Land Use Element includes human health and human services. This statement is incorrect. First, there is no language stating “human health” in the P section of the Land Use element. Second, the Land Use Element describes uses that are “allowed”, not “permitted.” Finally, the land use element states that human services are allowed but it is clear that the intention for the P land use is for “public uses” not simply any type of human service use. In Table 2 page 2-11 of the Redondo Beach Land Use Element, principal uses for P include “Governmental administrative and capital facilities, parks, schools, libraries, hospitals and associated medical offices, public cultural facilities, public open space, utility easements, and other public uses.”

Goal 1K states that the P land use will “provide for public uses which support the needs and functions of the residents and businesses of the City.” To meet the goal of providing public uses, Objective 1.46 “provide(s) for the continuation of existing and expansion of governmental administrative and capital, recreation, public safety, human service, cultural and educational, infrastructure, and other public land uses and facilities to support the existing and future population and development of the City.” The DEIR must correct this error by clarifying that P land use is designated for “public uses” and delete the terms “human health” and “permitted.”

## **3.0 ENVIRONMENTAL IMPACT ANALYSIS**

### **3.1 Aesthetics and Visual Impacts**

#### **VIS-2**

SL4-5 The proposed Project would alter the visual character of the Project site and surrounding areas in Redondo Beach. The development would not comply with the Redondo Beach General Plan and municipal code and would degrade the surrounding visual character making the impact of the development significant. The overall design is not integrated and compatible with the neighborhoods and is not in harmony with the scale and bulk of the surrounding properties thus conflicting with Municipal Code 10-2.2502(b)(4). The building shape is boxlike in character with no softening of the vertical mass through architectural design or setbacks therefore the project conflicts with Municipal Code 10-2.2502(b)(5) and (b)(5)(b). The mitigation measures to reduce the scale and bulk are insufficient to meet the requirements of this code. BCHD should consider reducing the size and bulk of the project, moving the project to the existing 514 building footprint at the south central area of the property. The project should respect the development in the immediate area through the use of similar setbacks, complimentary building arrangements, buffer yards and avoidance of overwhelming building scale and visual obstructions. The project should be compatible with the character of the surrounding neighborhood.

#### **Municipal Code 10-2.2502**

**(b)(4) Balance and integration with the neighborhood.** The overall design shall be integrated and compatible with the neighborhood and shall strive to be in harmony with the scale and bulk of surrounding properties.

**(b)(5) Building design.** The design of buildings and structures shall strive to provide innovation, variety, and creativity in the proposed design solution. All architectural elevations shall be designed to eliminate the appearance of flat façades or boxlike construction:

**(b)(5)(b)** The roof planes of the building, as well as the building shape, shall be varied where feasible, and a visible and significant roof line shall be used to soften the vertical mass.

### **3.10 Land Use and Planning**

#### **3.1-3 Impact Assessment: Conflicts with RB General Plan-Land Use Element**

SL4-6 **Goal 1K** -The P land use will “provide for public uses which support the needs and functions of the residents and businesses of the City.” The proposed RCFE is not a public use, it is a private use and therefore conflicts with this goal.

**Objective 1.46** “Provide for the continuation of existing and expansion of governmental administrative and capital, recreation, public safety, human service, cultural and educational, infrastructure, and other public land uses and facilities to support the existing and future population and development of the City.” The proposed RCFE is not a public human service use, it is a private use and therefore conflicts with this goal.

### **Policy 1.2.3**

Policy 1.2.3 Allows for the development of housing types intended to meet the special needs of senior citizens, in areas classified as Multi-Family Residential (“R-2,” “R-3,” “RMD,” and “RH”), Mixed Use (“MU-1,” “MU-2,” and “MU-3”) and Commercial Regional. The proposed RCFE development is located in the P zone which is in conflict with this policy.

### **Policy 1.5.1**

Under Policy 1.5.1 P Land Use “allows for the continuation of existing “public” recreational, cultural (libraries, museums, etc.), educational, institutional (governmental, police, fire, etc.), and health uses at their present location...” The proposed RCFE is a private commercial use, not a public health use. Policy 1.5.2 allows the development of private health uses in the commercial zones. The proposed RCFE development is in conflict with Policy 1.5.1 because it is a private “health” use, not a “public” health use.

**Policy 2.1.3** Table 2 identifies “uses for the P (Public) category includes governmental administrative and capital facilities, parks, schools, libraries, hospitals and associated medical offices, public cultural facilities, public open space, utility easements, and other public uses.” The proposed RCFE is in conflict with this policy because it is a private commercial use.

### **3.1-3 Impact Assessment: Conflicts with RB General Plan-Municipal Code Zoning Ordinance**

**Municipal Code Title 10, Chapter 2, Article 1, Section 10-2.402 (a)(155)(d) Senior Housing** indicates that “senior housing may be considered in residential, commercial and mixed use zones.” Further, the definition in the RB **Municipal Code** for senior housing is in **Title 10, Chapter 2, Article 1, Section 10-2.402 (a)(155)(d)**–“Senior housing shall mean housing provided in a residential care facility.” There is no mention of P or P-CF. The proposed RCFE development is in conflict with this municipal code.

**Municipal Code Title 10, Chapter 2, Article 2, Division 9, Section 10-2.1100(a)** Specific purposes, P public and institutional zones: “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.” There is no mention of health or human services in this section as a permitted use in the Public Institutional Zone.

**Municipal Code Title 10, Chapter 2, Article 1, Section 10-2.1624(c)(1)Housing for Senior Citizens**–zones where permitted by Conditional Use Permit. “Housing for senior citizens may be considered in the R-3, RMD, and RH multiple-family residential zones and in all commercial and mixed use zones.” The P-CF zone is not indicated as a permissible zone with a CUP in this section. The proposed RCFE development is in conflict with this municipal code.

**The Redondo Beach Municipal Code Title 10, Chapter 2, Article 2, Division 9, Section 10-2.1100** that Public Community Facility (P-CF) permitted uses are parks, parkettes, recreational facilities, beaches and coastal bluffs.” Again, in this section there is no mention of health and human services as a permitted use in the Public Community Facility Zone.



### 3.11 Noise

BCHD's development project will increase noise levels in local neighborhoods during the three or more years of Phase 1 construction. This increase in noise will degrade the quality of life for residents and especially children in local schools. Normal acceptable noise levels for Redondo Beach is 50 decibels in single family neighborhoods. During construction activity, this noise will increase to between 73-98 decibels. All phases of construction will involve heavy equipment, power tools, generators, and drill and pour for concrete piles. In addition, large haul trucks will generate noise on local streets as well as interrupt traffic flow. This project will unnecessarily burden the local community in the surrounding area. The mitigation measures are insufficient to reduce the significant impact. BCHD should consider a smaller project with a shorter timeline.

## 4.0 OTHER CEQA ISSUES

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. In particular, a DEIR 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. The Draft EIR failed to include significant health effect analysis for air pollutant emissions, aesthetic shading/sun blocking impacts, aesthetic night time lighting impacts, constant noise impacts, aesthetic glare impacts, intermittent noise impacts, cognitive delays, educational impacts at Towers Elementary, recreation reduction at Towers Elementary fields, increased EMF and other electrical risks from the 4kV substation, toxic water runoff impacts, and traffic safety/exhaust/noise impacts. This analysis must be included in the Beach Cities Health District's Draft EIR in order for it to comply with California CEQA Law. BCHD must revise and recirculate the DEIR to include the specific health impacts of the proposed development.

## Margallo, Sydney

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:36 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: BCHD Healthy living campus

**CAUTION:** Ex\*ēŭkage aig gēase dŋ kŋ+~ g̃ k ŋk̄ g̃kks/a++ā h ek\*s ₂ k̄gss yŋ k̄kŋw \*he~ ŋk̄+ek̄+ is gek̄₂ ike ak̄d safe.

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**To:** E\*+ <eiŭ , ~ hd.ŋŭg̃"  
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Dear Sir or Madam,

This is Shirley. I am the resident in Western Torrance. I am opposed to the construction project -BCHD Healthy living campus.

I live close to this project site and am very concerned about our privacy, the noises and traffic congestion. My son will be in Towers Elementary school starting this fall, which is just 100ft away from this project. And I am very worried about the hazardous wastes caused by the demolition and construction which could be harmful to kids' health.

Please kindly take our concerns into your consideration. Thank you!

Best,  
Shirley Wang

## Margallo, Sydney

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:06 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Received your flyer - I can help

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## THE MORE YOU K



### Beach Cities Health District's (Un)H

Phase I is a \$12,000 per month/bed Assisted Living Facility hillside, 130 ft. above homes and street level, blocking sunli

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:07 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Oppose BCHD

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## Margallo, Sydney

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:32 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Comment to BCHD DEIR

**CAUTION:** Ex\*ēŭkage aig gēase dŋ kŋ+~ ġ k ŋk ġkks/a++ā h ek\*s ȷ kğss yŋ kkw \*he~ ŋk+ek+ is gekȷ ike akd safe.

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- SI-1 We have been living in our home in the Pacific South Bay tract for over 24 years. Our home is located east of the projected BCHD construction. The 103 foot structure will stand 133 feet over our house and create considerable and significant shade and shadow for our home. The DEIR states that shading that occurs over extended periods of time can be considered a detriment. When daylight savings ends in November, it is already dark by around 4pm-ish and we have to turn on the lights already. But now with this proposed 103 foot building, we may have to turn on our lights earlier, around 3pm-ish. Who will pay for our added costs of electricity that we will need?
- SI-2 This proposed 103 foot tall building that the BCHD wishes to build will also not be compatible in the neighborhood. It will tower over the existing 1 story and 2 story homes in the Redondo Beach and Torrance cities. At 103 feet, it will be the third tallest building in the Beach Cities. It will also be the fourth tallest building in the city of Torrance. It will “stick out like a sore thumb” as it doesn’t match the existing residential homes.
- SI-3 And with this taller building at 6 stories jutting high in the sky and towering over the existing 1 story and 2 story homes, there will be privacy issues. The occupants of the 103 foot building will be able to peer into the homes below it. The homeowners including us will need to use window coverings i.e. curtains, blinds, shutters, etc. to keep prying eyes out which will contribute to our darkness and in turn we will need to use more electricity – see paragraph 1 above. Who will pay for this added cost of electricity that we will need to use so our privacy can be maintained?
- I oppose the Beach Cities Health District construction and ask that you stop the project.  
Thank you,  
-Stephanie Ishioka

## Margallo, Sydney

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:32 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Comment to BCHD DEIR

**CAUTION:** Ex\*ēŭkage aig gēase dŋ kŋ+~ g̃ k ŋk̄ g̃kks/a\*\*ā h ek\*s ȷ k̄gess yŋ k̄kŋw \*he~ ŋk̄+ek̄+ is gek̄ȷ ike ak̄d safe.

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**From:** +eThakie Ishioka <sishioka@yahoo.~ ŋ >  
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SI2-1 The BCHD DEIR states that the construction noise cannot be mitigated. The noise levels exceed FTA thresholds. The construction noise is significant and unavoidable. Single and multi-family residences surround the construction site. Elementary schools are within 350 feet and 905 feet. These are Towers Elementary and Beryl Heights Elementary, respectively. The construction noise level will be up to 91 decibels heard 60+ hours in a 6 day work week for 5 years. Some elementary school children will be subjected to this noise level their entire time while in elementary school. The school children will not be able to concentrate with all the construction noise. The teachers and students will need to use their “outside” voice and scream to be heard. Will this be an effective environment to learn? I would think not.

To listen to this construction noise 60+ hours in a 6 day work week for 5 years could cause hearing loss, communication interference, sleep interference, physiological responses, annoyance to all those living and working and studying near the construction site.

SI2-2 Not only is the noise an issue but associated with that is the vibration from the heavy machinery and the 10,000 heavy haul trucks carrying the debris and construction materials to and from the construction site. Our house is located extremely close to the construction site to the east in Torrance. A 24 year resident of Torrance. Our backyard is located on a hillside slope and just beyond that is the Flagler alley with another slope. Will these 2 slopes give way and slide into our house with all the vibration and unmitigated and unavoidable noise? This is very concerning to us and to our Torrance neighbors.

I would like for the BCHD to find another location to build.

Respectfully,  
-Stephanie Ishioka

## Margallo, Sydney

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:59 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Comments on March 10 Master Plan

**CAUTION:** Ex\*ēŭkage aig gēase dŋ kŋ\*~ ġ k ŋk ġkks/a\*\*ā h ēk\*s\_ k\_ess yŋ kkw \*he~ ŋk\*ēk\* is gek\_ ike akd safe.

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**From:** Edwaŭeaŭedwaŭbeaŭ2@yahoo.ŋ ŋ >  
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**To:** E)\* ōeiŭ@b̄ hd.ŋŭ>  
**Subject:** +ŋ ēk\*s ŋk ( aŭ h # \$ ( as\*ēŭ ġāk

Dear Beach Cities Health District Board,

As a life-long resident of the 1400 block of Diamond Street I would like to strongly object to your proposed building of a 120 foot long, 40 foot wide sub-station practically in the front yards of our homes on the very park land that the city set aside to serve as a buffer between the South Bay Hospital complex and our little neighborhood – a function that the little park and trees have served very well these many decades and we don't see a reason to change it now.

My father, the former Planning Director/Community Development Director for Redondo Beach for over 30 years, assures me from his long experience that there is no way that any Community Development Director and Planning Commission worth their salt will ever approve building a sub-station right up against R1 especially when there are so many alternative places on the site where it could be built – all of them further away from single family homes than the location they are proposing. The previous location for their sub-station (still in their diagrams as late as last December but now, oddly, only on page 160 of the March 10 plan) between the 512 parking structure and the Flagler alley is a better choice high up 2 hills above the Torrance neighborhood, better still, is the North end of the site high above the Vons alley where it will affect no single family dwellings (the usual recommendation that the Planning Director and Planning Commission make, my father says, when the site abutts against commercial). Actually, almost any other place on the site is better for the single family neighborhoods because of the elevation of the site. (Or just drop the Sub-Station plan and put your generators in the basement like other people. South Bay Hospital ran a whole hospital with patients and machines and everything for years with generators in their basements, why can't you?) The proper place for the sub-station would be right behind the 6 story assisted living facility – abutting commercial and close to the mammoth building it's providing power to. (Just as aside, and I know you hear this a lot, but no one in the Beach Cities Health District community has \$7500 to \$12,500 a month to live in this facility. So it's not really for the good of the community, is it? Anyway, my dad says that your proposed building of a sub-station next to R1 is "incompatible with the neighborhood". Brandy told us to look at the Preferred Alternative in the master plan...but there is no Preferred Alternative site for the Sub-Station in the March 10 Master Plan. The sub-station is in front of the 510 building across from our house on every diagram except the one on page 160 where it is in front of the 512 parking structure above the Flagler alley. The page is not marked as Preferred Alternative.

100 percent of the residents of the 1400 block of Diamond Street strongly oppose the proposed building of a sub-station across from our houses on what was intended to be and has always been a buffer shielding our neighborhood from the going-ons at the South Bay Hospital site. It's not much of a buffer if you build a 120 foot, 40 foot wide sub-station in the middle of it. The Electro-Magnetic Field around the Sub-Station will be a hazard to the health of everyone on the block, most of them seniors. Epistemological studies have linked the incidence of cancer to EMFs around Sub-Stations. Two of our elderly residents have pacemakers and cannot safely stand for any length of time near a Sub-Station lest the EM field interferes with or resets their pacemakers. (This is going to create a serious hazard for them every time they have to wait for the light to change in their cars or waiting to cross the street.) The engineer who lives next door tells us that these Sub-Stations must be built on level ground – on a bed of gravel so they would have to tear up the whole buffer (which is a hill) creating a digging and construction nightmare throwing who knows what kind of dust and pollution into the air we breathe for who knows how long creating yet another very serious health hazard for our three heart patients and my father who has COPD (no kidding – when they paved the road out front we had to take him to the ER. It took weeks of Steroids to get his breathing right again). Nevermind the construction noise and pollution – those will be over someday. What won't

SJC-3  
(cont.)

be over is the Electro-Magnetic Field coming off that Sub-Station. That we'll have for the rest of our now shortened lives. A gift from Beach Cities Health District whose only purpose is to bring Health to the community. Another gift for the rest of our lives is the destruction of our property values. Even if their artist renderings are eventually true and they somehow, someday grow trees tall and flowering enough to hide the 15 wall around their 120 foot long, 40 foot wide Sub-Station – Who wants to buy a house across from a Sub-Station? Nobody. As with most people, all our wealth is in our homes and after a lifetime of work with the market coming back our homes were finally worth something. Beach Cities Health District, if they have their way, will take care of that. I must say, they've been pretty bad neighbors of late. Last year, the guy that used to be City Manager of Hermosa Beach actually told us that BCHD would be needing our street for their deliveries and that we would have to enter from Prospect from now on. Honest to God, they were going to take the North side of our street, the Flagler Alley and Flagler proper all the way to Beryl and turn it into their own personal delivery route and I think they would have done it, too, if the Community Development Director of Torrance hadn't famously told BCHD in a letter that the City of Torrance owned "100 percent of Flagler to Beryl" and that BCHD wouldn't be using any of it for deliveries. And that was the end of that. BCHD dropped all plans to use Flagler for deliveries (and Diamond Street as well). Last time the City of Torrance saved our little street, now it's the City of Redondo's turn. So, to recap, we, the residents of the 1400 block of Diamond Street, strongly object to the building of a Sub-Station across the street. We strongly object to health risks and loss of property value this will cause and we strongly object to BCHD not even putting an alternative site for the Sub-Station in their Master Plan.

SJC-4

SJC-5

Stephen J. Curwick  
Hollywood TV and Screenwriter  
Son of Harlan J. Curwick  
Former Planning Director/Community Development Director for over 30 years

## Margallo, Sydney

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:11 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Over development

**CAUTION:** Ex\*elūage aig gēase dŋ kŋ~ ġ k ŋk ġkks/a++ā h ek\*s ȷ kġess yŋ kkw \*he~ ŋk\*ek\* is gekȷ ike akd safe.

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**From:** ساك تڤهكسڤاك <jsjŋadbed@eaŋhġkk.ke\*  
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**To:** E)\* <eiŋ@b̄ hd.ŋŋġ  
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## Margallo, Sydney

**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:17 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: "Read into the record" by 5:00 p.m.

**CAUTION:** Ex\*ēŭkage aig ġeāse dŋ kŋ\*~ ġ k ŋk ġkks/a\*\*ā h ek\*s ȷ kġess yŋ kŋŋw \*he~ ŋk\*ek\* is gekȷ ike akd safe.

**From:** ساكڤاوا ڤڤا <gg.kŋka12@g aig~ ŋ  
**Sent:** ! edkēday"#Ŗŭ2%'2821' ( ) \*  
**To:** +ŋ ȷ kŭ a\*ŋkŋs <+ŋ ȷ kŭ a\*ŋkŋs@,~ hd.ŋŭȷ  
**Subject:** -. ead ik\*ŋ \*he ŭŭ ŋŭ/ , y 0(8&\$ . .

**I OPPOSE THE BCHD HLC Project.** Please Stop the project simply based on **TRAFFIC, SAFETY, HEALTH & ENVIRONMENTAL HAZARDS** facts listed below that were already made known to those who care:

- The proposed project will expose thousands of residents, the public, and nearby schools to a minimum of 5 ACTIVE years of demolition and construction, hazardous cancer-causing pollutants, noise, vibration, and daily disruptions.
  - Towers Elementary school with 600+ school children aged 4-10, teachers and staff are located just 350 ft. downwind from the demolition and construction site
  - Beryl Heights Elementary school with 450+ school children is ~900 ft. away
  - Redondo Union and West High schools with over 5,000 students combined are 0.3 and 0.7 miles away.
- Increased traffic, congestion and safety issues will overwhelm nearby neighborhood streets with ~10,000 heavy haul trips planned during construction. All major surrounding thoroughfares and intersections in the cities of Redondo Beach and Torrance will be impacted.
- Negative impacts will be felt both during the 5+ years of active demolition and construction and after completion of the massive 24/7 RCFE and parking structure.
- Hazardous VOCs (volatile organic compounds) and carcinogens were found on the site. According to the [Phase II Environmental Assessment Report](#) by Converse Consultants dated 2/26/20. PCE (perchloroethylene) was detected in 29 of 30 samples, with findings of levels in amounts up to 150 times the allowable residential screening level.

**Please protect the surrounding citizens and children from these Health and Safety Hazards.**

Best Regards,

Susan Kawamoto



## Margallo, Sydney

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:53 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Response to DEIR  
**Attachments:** DEIR response by Susan Yano.pdf

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**From:** ekke\*h ĉakñ <ksyakñ@veŭzñk.ke+  
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## Comments and questions regarding the Beach Cities Health District's (BCHD) Draft Environmental Impact Report (DEIR)

I would like to note that all of my comments and/or questions directly relate to write-ups in the DEIR, a document approved by BCHD for release to the public. The DEIR makes reference to BCHD objectives and finances and other subjects related to the proposed project. Because this is supposed to be the public's opportunity to question or comment on the DEIR, I expect that any questions and comments related not only to environmental categories but also any subjects mentioned in the DEIR must be addressed. Thank you.

Susan Yano  
Torrance, CA

- SY-1 1) There are a lot of words in this DEIR that are strung together but have no meaning or that make little sense, such as "intergenerational hub of well-being;" "grow a continuum of programs, services and facilities;" "mission-derived services;" "evidence-based health and wellness programs;" "voluntary group of stakeholders." Can you provide a glossary?
- SY-2 2) Why is the Residential Care for the Elderly (RCFE) facility "necessary to support BCHD's public health and wellness programs and services"? (page ES-1) What exactly are these programs and services and what is the cost of each? Where does current support come from? Is BCHD running at a deficit?
- SY-3 3) BCHD says it has developed only a general development program for Phase 2 based only on design guidelines and the "best available planning information at this time." (page ES-1) How can BCHD evaluate construction impacts on the environment without more definitive information? How can the public assess any environmental impacts without details and specifics? BCHD has changed the designs of buildings in Phase 1 numerous times so how can the public be sure what BCHD will propose for Phase 2?
- SY-4 4) On page 51 of the DEIR, it reads: "...because Phase 2 would be developed approximately 5 years after the completion of Phase 1, there are uncertainties in the future health and wellness programming needs and financing." Does BCHD have money to build Phase 1? Does BCHD have money to build Phase 2? Is there any guarantee that these buildings will be built? What exactly are the uncertainties in future financing? Most construction projects do NOT meet budget or schedule targets. What happens if the money runs out before the project can be completed? Will the public be left with a toxic dump on the hilltop? What happens if there are project overruns? Does the private investor assume the cost of overruns? Do the beach cities assume the cost of overruns?
- SY-5 5) "The RCFE Building will include...a new subterranean service area and loading dock entry/exit along Flagler Lane." (page ES-1) Flagler Lane is a Torrance street. Has BCHD received permission from Torrance to use this small street which leads into a Torrance residential area? If the BCHD design presented in the DEIR is based on using this street and Flagler Lane is not available, is this DEIR invalid and a new DEIR required for a corrected design?
- SY-6 6) I do not understand BCHD's three "Project Pillars." (page ES-2) Can you provide detailed explanations of how the RCFE supports these pillars? Pillar 3 (Community) says: "Grow continuum of programs, services, and facilities to help older adults age in their community." Based on a person's ability to pay the \$12,000+ per month cost, less than 25 percent of RCFE residents would be from Redondo, Hermosa and Manhattan Beach. Residents would therefore

SY-6 (cont.) have to come from outside the beach cities' community. Can you please explain how this facility would help the elderly from the beach cities "age in their community?"

SY-7 7) The first of BCHD's "Project Objectives" is to "eliminate seismic safety and other hazards of the former South Bay Hospital Building" (Building 514). How many seismic evaluations has BCHD done on this building? Legally, how many years does BCHD have to bring this building up to seismic codes? Is it about 20? Are there other alternatives for safeguarding this building? How many people currently live and work in the Silverado Beach Cities Memory Care units housed in this building? Should these people be evacuated? (By the way, will these people be at "ground 0," exposed to construction noise and dust and pollution, for 29 months?) When did BCHD learn of the seismic dangers of Building 514? Was it before Silverado patients were moved into the building? BCHD rents offices in Building 514 to other companies/individuals. How many people are in danger by renting there? Is BCHD going to evacuate these renters because of environmental/safety concerns? I have attended several BCHD Board of Directors' (BoD) meetings in the basement of this building. Why would BCHD hold meetings, house some of its own offices and employees, rent to other businesses, and house up to 120 people requiring memory care if the building is dangerous?

SY-8 8) The second Project Objective is to "generate sufficient revenue through mission-derived services to replace revenues that will be lost from discontinued use of the former South Bay Hospital Building and support the current level of programs and services" (page ES-3). Can you please give specific examples of "mission-derived services?" How much revenue must be generated to replace lost revenues from the destruction of Building 514? What is the cost of "the current level of programs and services?"

SY-9 9) Project Objective #3 is to "provide sufficient public open space to accommodate programs that meet community health needs." What are the dimensions of the public open space required to accommodate these programs? How was this number determined? If there is no concrete plan for the buildings proposed for Phase 2, how can BCHD possibly determine the amount of public open space that will be available? What are the specific "community health needs" to be met by this public open space? What specific programs are planned for this open space? Will there be any restrictions on public use of the open space directly in front of the RCFE building? Will ball-playing be allowed? Will there be noise restrictions? Will homeless be allowed to set up tents? Will the wealthy residents of the RCFE be happy with public gatherings literally at their front door?

10) Project Objective #4 seeks to "address the growing need for assisted living" (page ES-3). Can BCHD show statistics or reports that there really is a growing need for assisted living? BCHD is 80 percent owner of Sunrise Living-Hermosa Beach. What is the current occupancy rate at Sunrise? Have profits from Sunrise gone down due to Covid? If they have, isn't that a contradiction of BCHD's statement that there is a growing need for assisted living facilities?

SY-10 In its January/February 2021 *Bulletin*, AARP cites the "Minnesota Approach" which is "evolving toward fewer nursing facilities, more care at home." This article states, "Among the 48,500 people whose long-term care is paid by Medicaid, more than 70 percent receive a waiver that allows them to receive services at home and in community-based settings like adult care centers. The state has also placed a moratorium on building new nursing homes or adding beds to existing ones..."

In the December 2020 AARP *Bulletin*, Patrick McGinnis, executive director of California Advocates for Nursing Home Reform, says, "Nursing homes are not good places for anyone except for short-term rehab. I would hope this is a wake-up call that the system isn't working."

SY-10  
(cont.)

In that same edition, it says, “Some 54,000 residents and workers in long-term care facilities died of causes related to the coronavirus within four months of the first known infection.” With what we have learned from Covid, isn’t it safer for seniors to stay in their homes? I would ask BCHD to provide reports, scientific studies and any other pertinent backup data to support their assertion that there is a “growing need for assisted living.”

SY-11

11) The fifth Project Objective (which sounds a lot like the third Project Objective) is to “redevelop the Project site to create a modern campus with on-site facilities with public open space and facilities designed to meet the future health needs of residents, with meeting spaces for public gatherings and interactive education.” The RCFE will be 203,700 square feet. This is basically a high-priced residence for about 160 people who must have yearly incomes of more than \$200,000 to be able to afford the \$12,000+ monthly fees. To meet the future health needs of residents, BCHD has allocated 14,000 square feet to PACE, 6,270 square feet for community services, and 9,100 square feet for a youth wellness center for a total of 29,370 square feet devoted to the public. What is the proportion of square feet allocated to the RCFE (basically a private care facility) to the public portion? Does BCHD, which is supported by tax dollars from the three beach cities as well as by rents for publicly-owned buildings, think this represents a fair proportion? What are the “future health needs of residents” and can BCHD please prioritize them? 2020 statistics show that the population for Redondo Beach is 65,835; for Hermosa Beach is 19,152; for Manhattan Beach is 34,793. That is a total population for the three beach cities of 119,780. If the RCFE can house 160 people, what is the proportion of residents (most of whom will NOT be from the beach cities) to the overall population of the beach cities?

SY-12

12) And for the last and sixth Project Objective, BCHD wants to “generate sufficient revenue through mission-derived services and facilities to address growing future community health needs.” (Doesn’t this sound a lot like Project Objective #2?) Again I ask, what are the future community health needs? What tools, reports, data and scientific studies has BCHD used to determine these needs? Is a residential care facility the most important way to meet these future community health needs? What are the costs associated with them? How much revenue must BCHD (a not-for-profit organization, as I was told by a member of the BCHD Board of Directors) generate to support these health needs? How much revenue will be supplied by the RCFE? When will the RCFE start generating revenue? How many years will it take for the cost of the RCFE to be paid?

SY-13

13) The DEIR says “noise impacts resulting from construction of the proposed Project with mitigation incorporated would remain *significant and unavoidable*.” As stated in the DEIR’s Table ES-1, “construction activities shall be restricted to the hours between 7:30 a.m. and 6:00 p.m., Monday through Friday, or the hours between 9:00 a.m. and 5:00 p.m. on Saturday to the maximum extent feasible.” What does that mean: “to the maximum extent feasible?”? If it is not feasible, does construction get to go seven days a week; does it get to go all night? Who determines what is “the maximum extent feasible?” Does BCHD really think it is restricting construction activities when it is allowing them to go on for 10 1/2 hours Monday through Friday and 8 hours on Saturday? Is this construction noise to go on for 6 days a week for five years in Phase 1? How many more years of construction noise will have to be endured in Phase 2? How many residents of Redondo Beach and Torrance live close enough to the site to be affected by this noise? How many of these residents are elderly? How many of these residents have serious illnesses? How many of these residents are babies or toddlers who take naps in the afternoon? How many are children in schools close to the site? How many residents use their outdoor yards for entertaining, gardening or relaxing — especially during Covid?

- SY-14 BCHD says it will “construct noise barriers to reduce noise levels to on- and off-site sensitive receptors, where feasible.” Who will determine what is feasible? The DEIR says “feasible noise barrier heights do not reduce noise levels for construction activities occurring above 30 feet. These construction activities would result in noise levels that would exceed FTA residential criteria.” Is the RCFE taller than 30 feet? How much taller? At what point in its construction would the RCFE be taller than 30 feet? Who determines the feasibility of the noise barriers? If construction activities result in noise levels exceeding Federal Transit Administration (FTA) residential criteria, will these activities be prohibited?
- SY-15 The DEIR says that excavation work would require “temporary shoring involving the use of auger drilled steel soldier piles.” How many augers would be used? What is the dB noise level of an auger? How many steel soldier piles would there be? How many days would it take to drill for all of them?
- SY-16 “Asphalt would be exported from the Project site in approximately 575 haul truck trips.” That sounds like a lot of asphalt. What tools or equipment would be used to break up the asphalt for removal? How long would this work take? What is the dB noise level of these tools?
- SY-17 An estimated 20,000 cubic yards (cy) of soil would be excavated and exported from the Project site involving up to 1,250 haul truck trips over a 1-month period, according to the DEIR. What tools or equipment would be used to excavate this soil? What is the dB noise level of this equipment? If my math is correct, wouldn’t that be about 48 haul truck trips 6 days a week for a month? What is the noise level of 48 trucks exiting the site in one day?
- SY-18 Haul trucks “should attempt to operate” in traffic lanes that are located at the greatest distance from sensitive receptors — typically the lane nearest the road centerline on a 4-lane roadway.” Trucks will be using Beryl Street, which is two lanes by Towers Elementary School. How is noise going to be mitigated for the schoolchildren? What is the noise level for a haul truck driving on the inner lane of 190th Avenue or Del Amo Boulevard as compared to the noise level in the outer lane? Is there a major improvement? Who is going to enforce that construction trucks will drive in the lane farthest from sensitive receptors? Who is a sensitive receptor?
- SY-19 One month prior to construction BCHD will distribute a notice to residents and businesses located in a 1/4-mile radius of the site. How will this notice mitigate construction noise?
- SY-20 BCHD will provide a telephone number to residents to submit complaints about construction noise. BCHD will keep a log of complaints and address complaints “as feasible.” Again I ask, who determines what is feasible? Will construction be stopped if a certain number of complaints are received? How many people need to complain before construction would be stopped? Is BCHD serious in proposing that a telephone complaint line and a log of complaints will mitigate noise?
- SY-21 How many jackhammers would be used on the construction site? The noise level of one jackhammer is 130 dB. (That is louder than a chainsaw at 120 dB but less than the noise level of a jet engine taking off which is 150 dB.) What other noise-producing tools and equipment will be used on the site? How many? For how long? Are there electrically-powered jackhammers? What is the noise level of an electrically-powered jackhammer? More than 100 mature trees must be removed for Phase 1, according to the DEIR. Will chainsaws be used to remove these trees? How long will it take to saw down these trees? Chainsaws have a 120 dB noise level; that is more than the 106 dB of a jetliner one mile away. How far does noise at the level of a chainsaw and a jackhammer travel? How many people in the residential areas surrounding the work site will be subject to the noise of these construction (destruction!) tools?

- SY-22 Is there any scientific evidence that shows the sound of jackhammers and bulldozers and heavy construction equipment is conducive to health? Is there any scientific evidence that the sound of a concrete-and-steel building being demolished is conducive to health? Is there any scientific evidence that the sound of tons of asphalt being torn up is conducive to health? Conversely, are there any scientific studies that show noise contributes to stress? Are there any scientific studies that show stress is not good for health or that stress makes it more difficult for the ill to fight their diseases? Are there any scientific studies that show that noise is not conducive to students learning? How many people living within a 0.25-radius of this noisy construction site have serious and/or terminal diseases? How many students are there within a 0.25-mile radius of the construction site? How many students are there at Towers Elementary School where haul trucks on a 2-lane road will pass by not only their classrooms but also their outdoor playground? How many people within a 0.25-mile radius of the construction site have COPD; asthma; emphysema; other lung-related diseases?
- SY-23 14) The DEIR says that “trash trucks would access the Project site via the proposed service area and loading dock entry/exit along Flagler Lane.” Again, Flagler Lane is a Torrance street. How many trucks per day would use this lane? How much garbage is projected to come from the site daily? weekly? monthly? yearly? How heavy is a trash truck loaded and unloaded? What damage would that do to the street? Many residents use Flagler Lane to access their homes. Has Torrance given permission to BCHD to use this little lane as their trash-hauling route? Has BCHD polled local residents as to whether they support the use of this Torrance residential street for large trucks hauling trash?
- SY-24 15) Trash trucks, construction trucks, heavy equipment, haul trucks — in other words, a lot of very heavy vehicles — would be using local streets such as Beryl Street, Del Amo Boulevard, Prospect Avenue, 190th Avenue, Flagler Lane. What are the load-bearing limits for each of these streets? If these construction vehicles damage streets around and to-and-from the site, is BCHD responsible for upkeep of these roads or will Redondo Beach and Torrance have to pay for road repairs? What is the cost of repairing 10 feet of road?
- SY-25 16) The DEIR says that sampling equipment that comes into contact with potentially contaminated soil or water shall be decontaminated. “Decontamination will use the following procedures: non-phosphate detergent and tap-water wash, using a brush if necessary; tap-water rinse; initial deionized/distilled water rinse; final deionized/distilled water rinse. Where does all this hazardous water used for decontamination go? How is it collected and disposed of? How will BCHD prevent it from leaching back into the soil or prevent run-off onto city streets?



## Margallo, Sydney

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:57 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Question about the assisted living

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Terry Thomas <terrythomas90278@gmail.com>  
**Sent:** Sunday, May 16, 2021 10:42 AM  
**To:** EIR <eir@bchd.org>  
**Subject:** Fwd: Question about the assisted living

I don't see any discussion of sexually transmitted diseases. There was a study by Cal Berkeley that showed that assisted living and nursing homes had very big increases in syphilis and other diseases. Where can I read the plan to control diseases in the BCHD facilities?

According to the Cal study, seniors that lived in assisted living had very large increases in sexually transmitted infections over those that remained in their own homes.

TT-1

Chlamydia infections increased by 52%  
Syphilis infections rose by 65%  
Gonorrhea cases increased by more than 90%

Please let me know where to find the answer to how BCHD plans to deal with this medical problem. If there isn't any plan published, then please submit this as a comment to the environmental review comments.



## Margallo, Sydney

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 11:59 AM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Records Request: CEQA Aesthetics: Shadows - Redirected to EIR mailbox

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Tim Ozenne <tozenne@gmail.com>  
**Sent:** Monday, April 5, 2021 5:55 PM  
**To:** PRR <PRR@bchd.org>  
**Cc:** EIR <eir@bchd.org>  
**Subject:** Re: Public Records Request: CEQA Aesthetics: Shadows - Redirected to EIR mailbox

The link you provided contained no information about whether BCHD has adopted the LA City Thresholds Guide, nor do I see any references to the review of other documents.

Would it be fair to conclude that BCHD has not adopted the LA Guide, nor considered alternatives?

On Mon, Apr 5, 2021 at 5:40 PM PRR <[PRR@bchd.org](mailto:PRR@bchd.org)> wrote:

Hello Tim,

The document that you are requesting is a reference document for the Healthy Living Campus Draft Environmental Impact Report (DEIR) which can be found at <https://www.bchdcampus.org/eir>. Responses to comment on the DEIR will be provided in the Final EIR following the close of the public comment period on DEIR.

Your email has been forwarded to the [EIR@bchd.org](mailto:EIR@bchd.org) mailbox by copy of this email.

Thank you.

----- Forwarded message -----

**From:** Tim Ozenne <[tozenne@gmail.com](mailto:tozenne@gmail.com)>  
**Date:** Wed, Mar 31, 2021 at 1:47 PM  
**Subject:** Public Records Request: CEQA Aesthetics: Shadows  
**To:** Charlie Velasquez <[Charlie.Velasquez@bchd.org](mailto:Charlie.Velasquez@bchd.org)>

I am researching parts of the recent DEIR for the proposed HLC.

The DEIR refers ( @ 3.1-28 ) to the *City of Los Angeles CEQA Thresholds Guide (2006)* with respect to project shadows.

Requests:

(1) I wish to know if BCHD has adopted that manual; if so when?

(2) I also wish to know if other similar manuals were reviewed, to the extent there are records that show which were considered. Were any adopted?

TO1-1  
(cont.)

P.S. I sort of recall there is a new email address for public records requests, but I can find it now. So please forward this to the appropriate office as seems reasonable. Thank you in advance.

## Margallo, Sydney

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:05 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Records Request

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Tim Ozenne <tozenne@gmail.com>  
**Sent:** Tuesday, April 6, 2021 6:34 AM  
**To:** PRR <PRR@bchd.org>  
**Subject:** Public Records Request

The recent Draft Environmental Impact Report references *City of Los Angeles. 2006. L.A. CEQA Thresholds Guide*. Please provide all documents demonstrating that BCHD has formally adopted that document.

[7-2 Healthy Living Campus Master Plan Project Draft EIR ]

## Margallo, Sydney

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:13 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: DEIR Comments  
**Attachments:** Ozenne\_DEIR\_Comment.pdf

**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Tim Ozenne <tozenne@gmail.com>  
**Sent:** Tuesday, May 25, 2021 11:22 AM  
**To:** EIR <eir@bchd.org>  
**Cc:** City Clerk <CityClerk@torranceca.gov>; Eleanor.Manzano@redondo.org <Eleanor.Manzano@redondo.org>; Tim Oliver Ozenne <tozenne.af4cf14@m.evernote.com>  
**Subject:** DEIR Comments

Attached are Comments from Tim Ozenne, a resident of Torrance, regarding BCHDs Draft Environmental Impact Report. It is my understanding that the comment deadline is June 10.

I would appreciate a short **confirmation** that this **message** and the **attachment** have been received. Please advise if there are any problems opening this PDF document.

No doubt, my comments include several inadvertent typographical or similar errors. So, please do your best to make sense of the material.

I am providing copies to the City Clerks of Torrance and Redondo with the hope that this material will be recorded and distributed as appropriate to affected mayors, councilpersons, and department heads.

# Comments on BCHD's DEIR

Tim Ozenne

Torrance

Beach Cities Health District, a local special district governed by California law, is proposing a massive redevelopment of its Redondo Beach property. It has named itself the Lead Agency to evaluate its own Environmental Impact Report pursuant to the California Environmental Quality Act.

The DEIR itself is nearly 1000 pages long, plus it features several lengthy appendices. Below are the Comments of Tim Ozenne, a resident of Torrance who has lived more than 42 years just 1,000 feet east of the BCHD eastern property line.

This comment has six main sections. The individual comments are meant to stand on their own, but here is an overview:

I. First, BCHD lacks the statutory authority to establish residential facilities. Thus, BCHD has no legal right to proceed. BCHD's CEO has repeatedly assured the public that BCHD is authorized to erect the planned facilities, but his assurances are empty.

II. Next, I provide evidence that the new structures being proposed will be larger and closer to residents, significantly increasing apparent size. This makes the DEIR claim that the proposal is "compatible" with the existing area uses a completely unsubstantiated, self-serving statement.

III. The DEIR also claims *Appendix M* shows that the shade effect of the HLC can be disregarded under the guidelines adopted by the City of Los Angeles. That is a serious error since BCHD has never adopted those guidelines and because the District lacks substantial evidence that shadows are not significant.

IV. The DEIR falsely concludes that the HLC will mean diminished vehicle traffic. As shown here, that claim is based on a significant fallacy, one apparently intended to mislead the public.

V. The DEIR pretends to consider PACE, but the DEIR analysis plainly fails to consider major PACE issues, including transportation, enrollments, safety and financial viability.

VI. Finally, expected benefits from the proposed project need to honestly reflect the risk of failure. There is no evidence this has been considered. The DEIR simply assumes all the goals of HLC will be met. If that is wrong, the balance of costs and benefits is useless.

# I. Statutory Limits on Health Care District Legal Authority: RCFEs vs. Current Law

In a nutshell, all Health Care Districts, including BCHD, have no legal power to own and operate residential facilities.

- Special healthcare districts are restricted to those powers specified in state law, particularly Health and Safety Code Division 23 Hospital Districts §32000–32492. For purposes of the law, what is or is not a *health facility* is not up to districts themselves nor to public sentiment.

While healthcare districts can own and operate *hospitals*, other types of special districts may not do so. “Special” districts are legally confined to restricted areas and services! It doesn’t matter if a district can assert a “need” or can document public approval, it remains limited by its enabling legislation. In particular, BCHD’s legal powers are not up to the BCHD board.

- Example: Limited powers isn’t a unique feature of healthcare districts. *All* special districts have only specific powers, whether for water distribution, fire protection, or hundreds of other services. We can see this in the case of *Airport Special Districts*: CHAPTER 4. Powers and Duties [HSC 22551 - 22559] which provides that

A district may do all of the following:

(a) Sue and be sued, ...

(b) Adopt a seal and alter it at pleasure.

**(c) Provide and maintain public airports, spaceports, and landing places for aerial and space reentry traffic.**

(d) Acquire by purchase, condemnation, donation, lease, or otherwise, real or personal property necessary to the full or convenient exercise of any of its powers or purposes.

(e) Improve, construct or reconstruct, lease, furnish or refurnish, use, repair, maintain, control, sell, or dispose of the property of the district, including any buildings, structures, lighting equipment, and all other equipment and facilities necessary for those purposes.

(Amended by Stats. 2000, Ch. 191, Sec. 3. Effective January 1, 2001.)

However, airport special districts are barred legally from operating hospitals, parks, and so forth because (c) above doesn't include these powers, nor are they *necessary* as provided in (d). Likewise, BCHD may not own or operate an airport or electric power system or, for that matter, a residential facility.

- A companion theory sometimes asserted is that while a healthcare district might not be allowed to own a certain type of facility directly—perhaps a weight-loss studio—it could permit such a facility on its property by leasing the land and working with a partner as investor or operator.

However, such a theory would basically allow *any* special district to offer any type of facility or service and so would eliminate a key feature of special districts and their enabling statutes. Naturally, the law does not permit any party to do indirectly what it cannot do directly. Joint ventures, partnerships, and contracts are not a way around legal limiting the powers of special districts.

- It is of course true that many ordinary behaviors, services and attitudes to be described as “healthy” or health related. Grocery stores and restaurants provide food; clothing stores sell protection from the elements; homes and apartments are healthier than living on the street, exposed to hot and cold. Even certain levels of psychological or emotional stress are at times said to be healthy. But, by law, healthcare districts are empowered to own and operate only *defined* facilities, not anything that might contribute to health or wellbeing.
- Even if other HCDs have enabled RCFEs elsewhere, that would not permit BCHD to enter the RCFE business. Clearly, HCDs may hire legal counsel to press the case, and there may be little local opposition or establishing an RCFE facility, but that does not create a legal basis.
- Although CEQA itself does not specifically require a legal right of any proponent such as BCHD or Lead Agency to demonstrate the project is within the proponent's legal right to carry out the project under existing law, CEQA does imply that the project must be legally permissible apart from environmental concerns addressed in the CEQA process. Accordingly, if a project is not allowed under existing law, then no proponent or lead agency can logically assert that it has an overriding interest in the project despite some remaining environmental harms.

Specifically, California law related to health care districts is primarily found in Division 23 Hospital Districts §32000–32492 of the California Health Care Code. Health Care District powers are largely defined in §32121, and most of those stated powers primarily establish that health care districts are units of full-fledged parts of government. Those government powers include: Use of a corporate seal; sue and be sued; hire staff and consultants; exercise eminent domain, and so forth. Such powers have nothing to do with district *objectives*, only with *means*.



As to legal objectives, Healthcare Districts have been authorized to own and operate specific *facilities*, largely enumerated in other Health and Safety Code (HSC) provisions, namely §1250 and §15432. Included there are hospitals, skilled nursing facilities, ambulance services, child daycare for employees and district residents, and so forth. A dominant theme here is that health care districts are empowered to address *medical* problems, especially human diseases and injuries and drug dependency, rather than some amorphous general “wellbeing.” Prevention and treatment of diabetes or heart disease is presumably within HCD powers; dealing with old age or unhappiness aren’t *medical* or *health* problems.

Note that certain HSC sections mentioned in the healthcare district statute were enacted mainly for separate purposes. For example, §1250 is primarily aimed at state *licensing* requirements, and §15432 mostly relates to which facilities are entitled obtain state *financial assistance*. The clear purpose of referencing §1250 and §15432 in the health care law is to define what is—and by implication what is not—viewed as a “health facility.” The law clearly establishes that health care districts can own and operate only some “facilities,” namely those *specified* in §1250 and §15432.

Such facilities include various types of hospitals, skilled nursing, ambulance services, intermediate care facilities, certain licensed health clinics, adult day care, and so forth. The lists of facilities set forth in §1250 and §15432 are essentially identical and have been updated at various times since the initial HCD law was enacted; if the legislature intended to broaden the scope of permitted health care facilities, it had numerous opportunities to do so. For example, the state might have included residential facilities for the elderly or the poor within HCD authority, but it did not do so.

Furthermore, a key consideration as to the powers of health care districts is *necessity*. At several points in the enabling legislation, we find language such as that of §32121 (m):

(m) To establish, maintain, and operate, or provide assistance in the operation of, free clinics, diagnostic and testing centers, health education programs, wellness and prevention programs, rehabilitation, aftercare, and any other health care services provider, groups, and organizations that are necessary for the maintenance of good physical and mental health in the communities served by the district.

For health services specifically mentioned in the enabling legislation, apparently necessity is not required, but for programs or services pursuant to (m), the law requires a showing that these are necessary to carry out the powers elsewhere specified. Things like gymnasiums, health food stores or demonstration kitchens or assisted living facilities are available in the area without District involvement, so one cannot establish that district *must* own or enable these as a matter of *necessity*.

Additionally, any claim that healthcare districts may provide residential facilities offering assisted living or the like must recognize that federal and state rules do not help pay the costs of living in such facilities. Residential facilities, gyms, and public meeting rooms are not health care facilities, which is why they are not eligible for federal or state funding. While how certain services are funded is a different matter from whether an organization is, by law, permitted to

TO3-2  
(cont.)

offer them, this funding reminds us that “residential” facilities are not generally recognized as healthcare facilities.

Finally, even if establishing a residential facility were otherwise legal, BCHD would need specific approval from its Local Area Formation Commission (LAFCO) to use its “latent” authority to establish a residential facility since it has not previously offered this service.<sup>1</sup> Again, BCHD appears to ignore the law on special districts.

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<sup>1</sup> See SOUTH SAN JOAQUIN IRRIGATION DISTRICT v. SAN JOAQUIN LOCAL AGENCY FORMATION COMMISSION, 4/22/2008

## II. Apparent Size

Any Lead Agency has a duty to ensure the public is fully informed about a proposed project. In particular, Section 21061 of CEQA states

The purpose of an environmental impact report 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.

It can be fairly said that the HLC DEIR raises no concerns about apparent size impacts of the proposed new facilities. At page 252 of the DEIR we note this language:

*Summary of Impacts on Visual Character*

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

The DEIR then continues with this:

The proposed RCFE Building would be most visually prominent from Flagler Lane near Towers Street (Representative View 2) and Beryl Street (Representative View 3), and along Beryl Street in front of the Redondo Village Shopping Center (Representative View 4). From Representative Views 2, 3, and 4, the proposed RCFE Building would be substantially taller and would have substantially more massing than buildings in the vicinity, thereby reducing the view of open sky above. However, although the proposed RCFE Building would change the visual character of the Project site and surrounding areas from these locations, the Phase 1 preliminary site development plan would meet the development standards described in the Redondo Beach and Torrance General plans and municipal codes and **would not degrade the visual character of the Project site and vicinity.** (Emphasis added.)

Perhaps the DEIR authors can assert *with no evidence* that erecting some rather large buildings on the property would not “degrade” anything, but the public has a reasonable expectation that an EIR will, *in so far as possible*, quantify changes in apparent size that would come with the project. But the DEIR provides no analysis of such effects. Thus, will begin that analysis here.

## Method and Estimates

I have estimated the Apparent size of various proposed structures (the proposed RCFE and the proposed Phase 2 parking facility in particular) as seen from several View Locations (A through I below), relative to the existing 514 Penthouse and the existing southern wing of the 514 Complex. The central question here is how the proposed buildings compare in terms of apparent size.

According to my estimates, the proposed structures will appear 66% to 173% **higher** than the comparable existing structures (scheduled for demolition in Phase 1).<sup>2</sup> Thus, I am rather surprised that the Draft EIR finds no issue with increased sizes of building that will be nearer area residents. See the separate table on the next page (below).

## Theory of Apparent Size

To a typical observer, the apparent size of any object reflects both its “actual” *size*—so high or so wide—and the *distance* to the object. While there are some variations in how one calculates apparent size, the basic idea is to estimate the visual or subtended angle. Suppose an object is 100 feet high and is 300 feet from an observer. The (plane) visual angle is given by the angle *atan* (size/distance). Thus, an object that measures 100 feet but which is viewed from a distance of 300 feet forms visual angle of about 27°. But if the *same* object is viewed from half the distance—150 feet—the visual angle would be 45° or 1.7 times as large. In short, making objects closer to viewers plainly increases apparent object size. This analysis can easily incorporate differences in elevation between an observer and an object.

Also, if we consider a building that has both height and width, its apparent size corresponds to the product of two solid angles, each reflecting the distance to the object. Indeed, if the visible “bulk” of an object is, say, 600 feet wide by 110 feet high, it would have an area of 66,000 square feet. Observed from 150 feet rather than 300 feet, its apparent bulk would increase by 1.7 times 1.7 or roughly 2.9 times. The DEIR should show how perceived bulk is affected with the proposed HLC design. It does not. Indeed, the DEIR has shows no data on apparent size.

## Application to the HLC Proposal

In any case, I used estimates from Murdoch/Wood data<sup>3</sup> to determine the *height* of target structures (*Base* vs. *Top*), and I used Google Earth to estimate the distance from each view location to the targets. From these, I find an index of the apparent size in degrees, which I then normalize to show how the apparent size varies for various targets from various view locations. Note that “100%” corresponds to doubling of apparent size.

<sup>2</sup> Oddly, the DEIR typically uses the overall height of the 514 Complex but then ignores rooftop structures on proposed buildings. I found no explanation for this dissimilar treatment.

<sup>3</sup> <https://www.bchdfiles.com/docs/hlc/BCHD%20HLC%20MASTER%20PLAN-20210308%20DRAFT-R1.pdf>

## Apparent Size Estimates

ID	View Location	Elev	Target Or Existing	Distance	Object Height Feet	Base	Visual Angle	RA Pct Change
A	Towers Field	95	RCFE East	537	128	135	13 °	169%
		95	514 Penthouse Ex	880	76	166	5 °	
B	19500 Tomlee	93	Proposed Parking	304	66	167	11 °	102%
		93	514 South Wing Exist	460	46	167	5 °	
C	56xx Towers St.	108	RCFE East	335	128	135	20 °	173%
		108	514 Penthouse	570	76	166	7 °	
		108	Proposed Parking	353	66	167	10 °	102%
D	195xx Mildred	92	Proposed Parking	546	66	167	7 °	83%
		92	514 South Wing Exist	709	46	167	4 °	
E	194XX Redbeam	88	Proposed Parking	772	66	167	5 °	73%
		88	514 South Wing Exist	938	46	167	3 °	
F	196xx Linda	89	Proposed Parking	1121	66	167	3 °	66%
		89	514 South Wing Exist	1300	46	167	2 °	
G	51x Prospect	160	514 Penthouse Ex	437	76	166	10 °	107%
H	Diamond End	160	Phase 2A	202	75	160	20 °	
		127	514 Penthouse Ex	475	76	166	9 °	136%
		127	New "Ramp"	216	85	138	21 °	

I have calculated apparent height for each object based on the *visual angle* between the top of the object and its base relative to the distance from the observer to the object, then comparing that angle to the angle corresponding to the Existing or reference object.

For these comparisons, I find the proposed buildings will be perceived as taller, with *relative* height increases from 66% to 173%. This increase in apparent size is the reflection of the fact that the plan would place very tall buildings *closer* to property boundaries—and thus closer to observers—compared with the 514 Complex.

Note: For G and H, I used estimates for the Aquatic Center and Parking Lot (Phase 2A) as viewed from Prospect looking east, and the Parking Lot as viewed from Diamond.

### Missing Analysis?

Of course, the Murdoch and Wood teams have all the data they would need to present much more detailed and extensive analysis that the public could use to evaluate changes in apparent size. For example, how would the Aquatics Center and Wellness Pavilion impact apparent size? No one knows, because the DEIR has no analysis of this issue. Further, how would inclusion of “bulk” (as opposed to only height and distance) affect these apparent size calculations?

Likewise, the teams could have provided several additional “renderings” in the DEIR that would help the public understand the impacts of new buildings rather nearer BCHD property boundaries relative to the location of existing buildings? Why are those missing?

I do not claim that my calculations are perfect, only that they are much more informative than the complete absence of such calculations in the DEIR. It is up to BCHD to provide relative size data and their associated methodology so that the public can judge the issue.

### Perspective

Further, to emphasize that there are ways to communicate with the public as to relative sizes, I offer this: I took a photo of the RB library. See the next page. What we see here is the simple effect of moving an observer from, say, 450 feet from a building (top left), to only 150 feet (bottom right). The effect (of shorter distance) is to increase the apparent size by **173%**, which is what I show for the comparison between the existing 514 Complex and the proposed RCFE(East). (Look at the first two data rows in the table, which show the visual impact of larger, closers structures; an 173% increase is what one would see by moving the Library from 450 feet away to just 150 feet way from an observer, such as a nearby resident. This should give many reviewers an idea of what a 173% increase in apparent size means!

Moving structures closer to neighbors has big effects that the DEIR seemingly tries to minimize.



## Distance Vs. Apparent Size: 172% Increase



Above Left: Farther (450 feet)      Below: Closer (150 feet) → 172% larger apparent size



Here I show how moving closer to an object—here the Redondo Beach main library—increases its apparent size. I show the visual impact of viewing the building closer to observers, similar to what BCHD proposes implicitly. Indeed, I show how the effect of shorter distances can result in a 172% increase in apparent size, similar to the effect illustrated in the table for viewing the RCFE from Towers Field



## Compatibility

One issue of the proposed BCHD property development is whether the proposed new, very tall buildings close to residences are or are not “compatible” with adjacent land uses. The above apparent size analysis suggest that these new buildings are not even remotely compatible. The DEIR could have included a similar analysis, but did not do so. So one must wonder: How can a large high-rise building on the border with nearby single-family homes be deemed compatible? This is an issue skirted in the DEIR, which simply asserts “compatibility” without any evidence or analysis.

## Conclusion

Presumably, before the BCHD Board adopts any EIR analysis, it will require a far more complete, unbiased analysis of the “aesthetic” and visual impacts of the HLC proposal, including analysis of how proposed size changes will appear to those off the property.

### III. Shade and Shadow Issues

Under CEQA, lead agencies must consider how shading and shadows will affect nearby “sensitive” properties. Indeed, the DEIR and its *Appendix M* provide a very limited analysis of this issue.

However, any fair reading of the DEIR and the *Appendix M* study must also find that the analysis is fails to provide any basis for ignoring shade and shadow effects, in part because BCHD has no history or experience as a lead agency. Thus, each and every “threshold” ruling it makes requires careful consideration of *substantial evidence*. That is currently lacking.

As the DEIR at page 226 notes,

The CEQA Guidelines do not provide thresholds with respect to shade and shadow impacts. Neither the City of Redondo Beach nor the City of Torrance have adopted thresholds with respect to shade and shadow impacts. However, as set forth in the City of Los Angeles CEQA Thresholds Guide (2006), a project would normally be considered to have a significant shade and shadow impact if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than four hours between 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October).

However, the DEIR fails to mention that BCHD has never adopted *any* shade and shadows guidelines. Nor has BCHD weighed the guidelines of Los Angeles or any other jurisdiction and determined that the LA City rules are specifically and uniquely appropriate for the BCHD service territory. Also, the CEQA “rules” prevent any lead agency from merely adopting guidelines in order to arrive at some desired outcome. Rather, BCHD is obligated to independently examine if shadows caused by the project are significant and whether there are means to mitigate adverse effects.

See, for example, this CEQA section:

15064. DETERMINING THE SIGNIFICANCE OF THE ENVIRONMENTAL EFFECTS CAUSED BY A PROJECT

...

(b) (1) The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data. An ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting. For example, an activity which may not be significant in an urban area may be significant in a rural area.

(2) Thresholds of significance, as defined in Section 15064.7(a), may assist lead agencies in determining whether a project may cause a significant impact. When using a threshold, the lead agency should briefly explain how compliance with the threshold means that the project's impacts are less than significant. Compliance with the threshold does not relieve a lead agency of the obligation to consider substantial evidence indicating that the project's environmental effects may still be significant.

Also, according to a recent CEQA Topics paper<sup>4</sup> (*CEQA Portal Topic Paper: Thresholds of Significance*)

Lead Agencies may not arbitrarily establish thresholds to either create or avoid significant impacts. Thresholds must be backed by substantial evidence, which is defined in the CEQA statute to mean “facts, reasonable assumptions predicated on facts, and expert opinion supported by facts” (State CEQA Guidelines § 15064.7(b)).

## Other Factors

Note also that the unusual topography of the BCHD property and the surrounding area demand very careful analysis. For example, the LA City guidelines cited in the DEIR explain how one needs to incorporate topographical features into a proper shadow model, but we find no indication that the authors of Appendix M took those features into consideration. For example, homes in Torrance east of the project lie significantly below the eastern boundary of the property, some more than 30 feet below the border and 60 feet below the main property elevation. Perhaps the shadow model did incorporate that fact, but one cannot determine that from the Appendix. BCHD, as lead agency, needs to verify that Appendix M is accurate. One cannot help but note that elsewhere (page 229), the DEIR offers great detail on some of its “renderings:”

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 rendering...

Apparently, the method used to represent topography around the HLC for a shade model is not as important to the public as details on certain photosimulations.

Moreover, while the City of Los Angeles may have good reasons to choose its rules for determining how it would implement CEQA thresholds, why assume that its guidelines are suitable for HLC development? For example, household incomes in the BCHD area surely exceed those for nearby areas, so presumably local residents would value sunlight more highly and would *not* be willing to give up as much sunlight to permit project development in their area as would the “average” resident of Los Angeles. Therefore, BCHD should explain fully how much sunlight will be blocked near the proposed development, not assume (as is implied by Appendix M) that sunlight after 5 p.m. has no value to area residents. Also, BCHD should

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<sup>4</sup> [https://ceqaportal.org/tp/CEQA%20Portal%20Topic%20Paper\\_Thresholds%20of%20Significance\\_2020%20Update.pdf](https://ceqaportal.org/tp/CEQA%20Portal%20Topic%20Paper_Thresholds%20of%20Significance_2020%20Update.pdf)

carefully explain how it proposes to value lost light rather than applying arbitrarily selected guidelines from another city.

## IV. VMT: No Rational Basis

The DEIR informs us that “Vehicle Miles Traveled” will drop if BCHD’s proposed plan goes forward. Here is an area where the public needs to understand the logic error baked into the analysis since the DEIR analysis is clearly defective.

In CEQA analysis, much attention is now paid to Vehicle Miles Traveled, which is in some sense more “global” (or area-wide) than prior analysis which focused on the local burden on streets, intersections, and so forth. In the case here, though, the BCHD planners argue that vehicle miles traveled will drop due to the plan. But this claim rests on an obvious fallacy.

BCHD takes the position that demolishing the existing 514 hospital complex will eliminate many trips, enough so that total trip mileage will fall since the RCFE and PACE facilities will increase travel much less than will be avoided by erasing the 514 Complex.

The rather obvious fallacy is that BCHD would have the public believe that, by demolishing medical facilities at the complex, vehicle travel simply goes away, not displaced. Those who might have used 514 for a medical service simply stay home? Staff that might have assisted simply stays home? And so forth.

Indeed, the DEIR at page 854 states

Implementation of Phase 1 is estimated to reduce existing trip generation by approximately 1,919 daily trips, 234 AM peak hour trips, and 158 PM peak hour trips. Therefore, Phase 1 of the proposed Project would reduce VMT.

Of course, the DEIR identifies various VMT “offsets” from Phase 2, but the fallacy remains: Removing an existing facility may or may not affect VMT, but it surely doesn’t eliminate all associated travel.

It is true, of course, that no one really knows the travel impacts expected when a given facility is demolished. Perhaps some customers and staff will be diverted elsewhere. Some may travel more, some less. (Other things the same, they will travel further!) But to pretend that travel is simply eliminated is obviously very wrong, even if it helps sell the HLC proposal.

The failure to consider travel “displacement” is particularly bothersome because the root idea of VMT is to consider wider area effects rather than focus just on local effects. BCHD should, at the very least, explain whether travel is really eliminated or merely rerouted. If it can’t show reduced travel, it should not claim VMT benefits in the DEIR analysis.

## V. Incomplete PACE Analysis

The DEIR fails to provide a useful analysis of PACE (Program for All-Inclusive Care for the Elderly). Accordingly, the BCHD Board is obligated to include a complete analysis of PACE and its relationship to the overall HLC before moving forward in the EIR process.

The PACE analysis in the DEIR fails to provide substantial evidence as to the size of the program and how it might or might not fit with the overall plan and the neighborhood. For example, one characteristic of PACE programs is that they bring in clients using dedicated vans, with vans typically transporting 10 or 12 clients on each trip. Nowhere in the DEIR, though, can one find an estimate of how many clients BCHD expects for the program and, lacking that, how can anyone claim to know the traffic or other impacts PACE will have in the area? How many vans will be needed?

The PACE facility was a “late add” in the HLC process. When it was first introduced some time ago, the plan was provide 14,000 square feet to accommodate 400 clients (200 per day, most days). But now we have no idea if that is still the plan, only the repeated use of the 14,000 s.f. area plan with no further detail. As a result, perhaps, the DEIR has no information as to expected PACE staffing. How is the public to weigh the PACE proposal with no evidence?

As to transporting the clients, one notes that the DEIR pretends that somehow PACE will substantially rely on “shared” vans including those operated by WAVE, a local transportation company. At DEIR P 148 we find this:

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

Apparently, the DEIR authors have little idea how typical PACE programs operate when it comes to the logistics of pick up and delivering clients—many of whom are confined to wheelchairs—and how many are expected to come and go each day. In email correspondence, a WAVE representative indicated that WAVE is available only to Redondo and Hermosa residents, and that WAVE would not be able to accommodate 200 daily passengers in any event.

Then there is the issue of picking up and dropping off 200 or so clients most days. As PACE is really designed for Medicaid beneficiaries, it is not clear where BCHD would find and recruit participants to fill the coffers. It is not clear how the associated van traffic would affect the local area, nor whether BCHD intends to benefit only Redondo, Hermosa and Manhattan residents who are within the BCHD service territory.

Also worth mentioning is that California has specific rules on the time allowed for transporting PACE clients: For the longest trips for the worst off client, the limit is 60 minutes. DHCS Policy Letter 18-01 stipulates this as to PACE provider organizations:

- (A PACE Provider) Entity must be able to serve all requested zip codes from PACE Center(s) (subject to 60-minute one way travel time ADHC requirement)

The DEIR gives no clue as to how BCHD could satisfy this rule. Nor do we see any analysis of how 40 or so van trips each day might affect local traffic or the safety of elementary school children a within 900 yards from the proposed PACE driveway.

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(cont.)

Bear in mind, too, that PACE would dispatch its pick-up vans in the morning, likely about the same time as school children will be in transit. Then, in the evening, PACE would dispatch its vans, presumably in early evening. The DEIR should have articulated likely van travel times as well as numbers and expected routes. But it does not!

Of course, we also don't know how BCHD or its chosen operator expects to find clients from the local area since household incomes are well above Medicaid levels. The financial viability of PACE as well as local staffing and traffic burdens obviously depend on PACE enrollments, but the DEIR provides no information the public might use to evaluate the program.



## VI. Need for Redevelopment?

A key issue in the whole HLC/DEIR proposal is whether there is a demonstrated “need” for the proposal. There is no such need.

Let us begin with a simple proposition: As it currently operates, BCHD is not the sole provider of any programs or services it offers. Indeed, BCHD went out of the hospital business some time ago because it could not compete successfully with many other providers. And it is hard to identify any unique services that BCHD alone can and will fulfill. It faces competition in everything it does.

But, if BCHD is not the sole provider of services somehow related to health or wellbeing in its service territory, what might it mean that it must provide any level of specific services? Can anyone really claim that there is an important market that BCHD alone can and will serve? If not, any assertion by BCHD that it must obtain revenues and offer programs into the future is pure fantasy.

To be specific, the DEIR Executive Summary states (Page 7 and elsewhere) that a key objective of the HLC project is to

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

But, if other providers can and will offer similar healthcare services and facilities, what is the unique role of BCHD? Readers will notice that in this DEIR, BCHD fails to provide any indication of its unique role. And, as others already noted, BCHD has not publicly quantified what future healthcare goods and services are required in the service territory, nor has BCHD bothered to indicate what share of this market it should provide. What might happen if BCHD does not provide its unidentified level of service? Nothing!

We have already argued that, as a healthcare district, BCHD lacks any legal authority to establish or operate residential facilities. But, despite this lack of legal authority, what might happen if BCHD plows ahead with its HLC plan. What will happen then?

What we know, after months of correspondence with BCHD, is that it has no published analysis of what would happen if, say, rents or occupancy of the RCFE are below targets. It simply ignores any risks to its forecasts, even though it is easy to show that rents or occupancy that are just 5 or 10% below the target will likely cause bankruptcy or the elimination of existing programs.

We can expect that BCHD will simply “override” all the negative environmental impacts and approve its EIR. To do so, it is supposed to quantify the expected benefits from its project and the adverse environmental effects. While others can and will point out many of the adverse effects, we should also examine the possible benefits. But what are they?

In the first place, a central objective of the HLC is to build—or at least accommodate—a residential facility. Analytically, a good place to start would be quantification of the health benefits for residents of such facilities elsewhere, together with adjustments as warranted when applying general results to HLC residents. However, despite extensive search, I can find no evidence that shifting the elderly from current residences to an RCFE facility improves health or longevity. Of course, advocates and advertisers can list putative benefits from increased socialization, improved nutrition, and so forth, but such listing does not imply that there are significant *net* gains. Note some observers claim that relocating from a long-time home to an institutional facility is rather stressful for the “clients.” Further, it is clear that comparing the health or longevity of RCFE clients to non-clients is fraught with logic problems, not the least of which is that one can’t assume that RCFE clients face the same problems as others. While it might be unfair to expect BCHD to provide exact estimates of expected benefits, surely those benefits must be made explicit and measured for any “override” to be acceptable.

And, if BCHD votes to override negative impacts in the expectation that they are unavoidable if RCFE benefits are to be realized, we also must deal with the likelihood that the HLC will not achieve many of its projected benefits because there is a substantial risk that BCHD will fail financially. Even a modest reduction in RCFE unit rents and occupancy could well lead to bankruptcy or curtailment of future programs. The public has no basis for quantifying those risks, though, because BCHD has not put forward the needed analysis. But what if there is a 20% chance that, after 10 years say, the plan proves economically infeasible? What then happens to the benefits that were expected to offset the up-front harms from construction?

**From:** [EIR](#)  
**To:** [Meisinger, Nick](#)  
**Subject:** Fw: Comment on the HLC DEIR  
**Date:** Tuesday, June 15, 2021 1:51:32 PM  
**Attachments:** [TOO 6-9.pdf](#)

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**CAUTION:** External email. Please do not click on links/attachments unless you know the content is genuine and safe.

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>  
**Sent:** Thursday, June 10, 2021 12:17 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Fwd: Comment on the HLC DEIR

I concur with Dr. Ozenne's comments and adopt them as my own DEIR comments as well.

----- Forwarded message -----

**From:** Tim Ozenne <[tozenne@gmail.com](mailto:tozenne@gmail.com)>  
**Date:** Thu, Jun 10, 2021 at 11:48 AM  
**Subject:** Comment on the HLC DEIR  
**To:** EIR <[EIR@bchd.org](mailto:EIR@bchd.org)>  
**Cc:** City Clerk <[CityClerk@torranceca.gov](mailto:CityClerk@torranceca.gov)>, <[Eleanor.Manzano@redondo.org](mailto:Eleanor.Manzano@redondo.org)>, Tim Oliver Ozenne <[tozenne.af4cf14@m.evernote.com](mailto:tozenne.af4cf14@m.evernote.com)>

Attached is an additional Comment from Tim Ozenne, a resident of Torrance, regarding BCHDs Draft Environmental Impact Report. It is my understanding that the comment deadline is today, June 10.

I would appreciate a short *confirmation* that this [message](#) and the [attachment](#) have been received. Please advise if there are any problems opening this PDF document.

No doubt, my comments include several inadvertent typographical or similar errors. So, please do your best to make sense of the material.

I am providing copies to the City Clerks of Torrance and Redondo with the hope that this material will be recorded and distributed as appropriate to affected mayors, councilpersons, and department heads.

## Comment on the HLC's RCFE Element

The Draft Environmental Impact Report (DEIR) is deficient in that it fails to establish that BCHD has a legal right to establish residential facilities, including the proposed residential facility for the elderly, under its *special district* powers (HSC §32000–32492). The DEIR seems to presume this facility is authorized, but it is not. At minimum, the DEIR should state the specific legal basis for erecting an RCFE, or how BCHD could remove obvious legal impediments to construction of such a facility by a healthcare district.

The enabling law for Health Care Districts (HCDs), §32000–32492, includes this material at §32121:

j. To 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. “Health care facilities,” as used in this subdivision, means those facilities defined in subdivision (b) of Section 32000.1 and specifically includes freestanding chemical dependency recovery units. “Health facilities,” as used in this subdivision, may also include those facilities defined in subdivision (d) of Section 15432 of the Government Code.

k. To do any and all other acts and things necessary to carry out this division.

l. To acquire, maintain, and operate ambulances or ambulance services within and without the district.

m. To establish, maintain, and operate, or provide assistance in the operation of, free clinics, diagnostic and testing centers, health education programs, wellness and prevention programs, rehabilitation, aftercare, and any other health care services provider, groups, and organizations that are necessary for the maintenance of good physical and mental health in the communities served by the district.

These subsections are rather different. Subsection (j) authorizes certain facilities, and services, namely those listed directly and those included in subdivision (b) of Section 32000.1 and in subdivision (d) of Section 15432.

Subsection (m) here goes further to include free clinics, diagnostic and testing centers, health education programs, wellness and prevention programs, rehabilitation, aftercare, and any other health care services. But note that (m) does not encompass *facilities*.<sup>1</sup> So even if one were to imagine that (m) gives HCDs license to *assist* programs that somehow are “necessary” for good physical and mental health,” it does not include establishing such facilities. Moreover, one must not ignore the existing stipulation that only “necessary” programs or services are permitted. None can reasonably conflate “necessary” with useful or helpful.

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<sup>1</sup> One argument used by some RCFE advocates is that the law, in referring to “retirement programs” really means or includes “residential programs.” But this is illogical as well as self-serving. The actual law does indeed use “retirement” four more times, but always in the context of retirement as normally conceived, and never where “residential” could mean the same thing. One might also note that, when the law first passed, it applied to hospitals, many of which had existing retirement programs. That was the plain meaning.

Next, we note the DEIR fails to tell readers if the proposed RCFE would provide other accommodations beyond memory care and assisted living. But in the summary of one advocacy group, we find this:

What do RCFEs Provide?<sup>2</sup>

Services may include:

- Assistance with ADLs: eating, bathing, dressing, toileting, mobility, etc.
- Medication management
- Social and recreational activities
- Housekeeping services
- Meals
- Transportation
- Dementia care
- Health-related services

It appears that the BCHD RCFE would provide exactly these services, although the DEIR does provide details.

One can also consult *Residential Facilities, Assisted Living, and Nursing Homes* from the National Institute on Aging<sup>3</sup> which clearly categorizes RCFEs as *residential* facilities. Plainly, HCDs are not allowed under (k) to establish residential facilities, and--under (m)--HCDs can at most assist residential programs if they are *necessary*. Yet the DEIR has not attempted to show that its proposed RCFE facility would be allowed under section (k), nor that it can assist RCFE programs as necessary under (m).

#### **Scope of HCD Authorized Powers:**

##### **(1) Section 15432**

The term “residential” appears just twice in in §15432.

(d)(9) A multilevel facility is an institutional arrangement where a residential facility for the elderly is operated as a part of, or in conjunction with, an intermediate care facility, a skilled nursing facility, or a general acute care hospital. “Elderly,” for the purposes of this paragraph, means a person 62 years of age or older.

... (14) A nonprofit community care facility, as defined in subdivision (a) of Section 1502 of the Health and Safety Code, other than a facility that, as defined in that subdivision, is a residential facility for the elderly, a foster family agency, a foster family home, a full service adoption agency, or a noncustodial adoption agency.

Plainly, the proposed BCHD is not included as part of a “multilevel facility” as described in (d)(9). And, as to (14), clearly, HCDs are government agencies, not private entities, and thus do not qualify as “nonprofit” for purposes of §15432 and RCFEs belonging to HCDs cannot be construed as a community care facilities.

Thus, one cannot reasonably conclude that RCFEs such as that proposed by BCHD are authorized under §15432.

##### **(2) Section 1250**

Next, one must consider §32000.1 which links directly to §1250 <sup>4</sup>

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<sup>2</sup> <http://caassistedliving.org/about-assisted-living/assisted-living-in-california/>

<sup>3</sup> <https://www.nia.nih.gov/health/residential-facilities-assisted-living-and-nursing-homes>

<sup>4</sup> §32000.1 stipulates: “b. ‘Health care facility’ shall mean a health facility as defined in Section 1250 and a clinic as defined in Section 1204.’

TO4-1  
(cont.)

Section 1250 *might* also include RCFEs as “health facilities, but *it does not*. Subsection (i)(1) and (2) have just one reference to “residential,” stating

(i) (1) “Congregate living health facility” means a *residential* home with a capacity, except as provided in paragraph (4), of no more than 18 beds, that provides inpatient care, including the following basic services: medical supervision, 24-hour skilled nursing and supportive care, pharmacy, dietary, social, recreational, and at least one type of service specified in paragraph (2). The primary need of congregate living health facility residents shall be for availability of skilled nursing care on a recurring, intermittent, extended, or continuous basis. This care is generally less intense than that provided in general acute care hospitals but more intense than that provided in skilled nursing facilities.

In short, even if BCHD sought to qualify its proposed RCFE under (i)(1) as a congregate living health facility—and that could be challenged—this passage clearly limits the number of beds and includes additional conditions not offered in the BCHD facility.

The DEIR is plainly incomplete as regards the RCFE element as it fails to establish that BHCD has the power to establish this sort of residential facility. Thus, any Final EIR must address this issue or the public will have no way of determining if the HLC is even legal.

Sincerely,  
Tim Ozenne  
Local Resident

## Margallo, Sydney

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:10 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Oppose Construction

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**From:** tresor ok <tkogeewon@gmail.com>  
**Sent:** Saturday, April 17, 2021 11:19 AM  
**To:** EIR <eir@bchd.org>  
**Subject:** Oppose Construction

Do not want 5years of Debris Noise Traffic Jams & Obstructing Views upon construction!!!

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Tiya Choi 310-303-2920



## Margallo, Sydney

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:11 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Healthy Living Campus

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**From:** v minami <evirginias@hotmail.com>  
**Sent:** Saturday, April 17, 2021 4:14 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Healthy Living Campus

Hi,

I am sure you have heard an earful of complaints and protests already. I am wondering if you might be able to plop this project where the declining Southbay Galleria is instead. The height won't bother anybody, there is plenty of space, it won't affect an elementary school full of children and teachers, you won't have to deal with Torrance...

Yours hopefully,  
Virginia Minami

## Margallo, Sydney

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 12:20 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Comment on BCHD Healthy Living Campus

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**From:** Warren Croft <wcroft01@gmail.com>  
**Sent:** Saturday, May 1, 2021 1:53 PM  
**To:** EIR <eir@bchd.org>  
**Cc:** Warren Croft <wcroft01@gmail.com>  
**Subject:** Comment on BCHD Healthy Living Campus

Hello,

My name is Warren Croft and I live directly across BCHD at 509 N. Prospect. I am opposed to the BCHD Healthy Living Campus for the following reasons:

- WC-1 1. Negative environmental impacts. I am concerned about the air we will breathe and the noise during the demolition. The DEIR minimizes the impact on residents (3 adults in my household) and children (4 children in my household). The
- WC-2 DEIR, Phase 1 underestimates the potential environmental impacts. Phase 2 is unstable, lacks clear detail and the
- WC-3 mitigation measures are unclear.
- 2. Increased traffic. There will be an increase of construction vehicles for the duration of the project and Prospect is
- WC-4 already a very high traffic area. Adding heavy haul construction equipment truck trips will be a nightmare to local
- residents, especially when school resumes to a normal schedule for 2022 going forward.
- 3. Problems with parking. There is already a problem with people who park on the residential street on Prospect instead
- WC-5 of using the lot (I'm assuming there is a fee but I really don't know). This has been problematic for some time now. I
- don't see how this project solves that problem and only makes it worse.
- 4. Noise. Construction noise is constant during work hours. My home is directly across the street and noise cannot be
- mitigated (per DEIR). My family and neighbors will be directly affected by construction noise for the duration of the
- project (which will be years).

Thank you for listening to my concerns and taking them into consideration,

Warren Croft  
509 N. Prospect  
Redondo Beach, CA  
90277

## Margallo, Sydney

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:36 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Objection to BCHD's (Un)healthy living campus

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**From:** Wei Yu <wwui.yu@gmail.com>  
**Sent:** Monday, June 7, 2021 9:07 AM  
**To:** EIR <eir@bchd.org>; trao90503@gmail.com <trao90503@gmail.com>  
**Subject:** Objection to BCHD's (Un)healthy living campus

WBJYL-1

Dear Committee,

This is Wei Yu, a family living on 19922 Tomlee Ave, Torrance, CA 90503. The new construction plan raises my concern to the safety and living-friendly environment about my community. It will break our peaceful living style over the next 5 years and bring safety concern to my son and daughter.

Therefore, on behalf of my family, Joyce Li, Brianna Yu, and Jonathan Yu, I object the plan.

Thanks,  
Wei Yu  
Joyce Li  
Jonathan Yu  
Brianna Yu

## Margallo, Sydney

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:36 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Beach Cities

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**From:** Wendy Spadaro - Shoreline Ent. <tupperla@aol.com>  
**Sent:** Monday, June 7, 2021 11:21 AM  
**To:** EIR <eir@bchd.org>  
**Subject:** Beach Cities

WS-1 I am a long-time resident of Redondo Beach. I live on the border of Cluster Lane and 190<sup>th</sup> Street. I would like to express my opposition to the proposed project that would build a high-end assisted living facility where Silverado currently exists and where pricing currently begins at approximately \$10K per month, per person. At that cost, only the affluent are able to afford Silverado. The new facility is projected to cost even more per person. That means only the VERY affluent will be able to afford to live there.

WS-2 The construction is projected to take at least 5 years to complete. 5 years of noise, traffic, pollution, potentially unsafe emissions to the environment and the very air I breathe. I am 60 years old and live close enough to the potential construction site that I can envision 5 years of keeping my windows closed and avoiding time I now spend enjoying my beautiful patio with family and friends.

Finally, my own health and comfort is but one inconvenience. Many other long-time Torrance and Redondo residents will be impacted, including residents with small children, as well as Towne Avenue Elementary School where, for 5 years, children may be exposed to currently unknown and possibly harmful emissions from this project.

WS-3 It seems to me this project is simply a money maker for the builder/owner of this new, and more expensive, assisted living facility. We already have an existing, perfectly acceptable and lovely, facility called "Silverado."

WS-4 I vehemently oppose this project.

Wendy Spadaro

## Margallo, Sydney

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:10 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: DIER Comments

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**From:** William Shanney <wshanney@verizon.net>  
**Sent:** Monday, May 24, 2021 12:36 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** DIER Comments

WVS-1 | I read the DEIR and think it is both biased and identifies significant impacts on surrounding neighborhoods. The flaws are  
WVS-2 | mostly the misrepresentation of the huge size of the complex caused by picking photo sites that do not emphasize the  
WVS-3 | size. The impacts are due to the identification of the inability to mitigate noise and dust during construction. The effect  
of noise and dust on our health and that of the school children has been downplayed. An organization with Health in its  
name should be ashamed at such behavior. BCHD appears to think it is OK to hurt or kill people so they can move ahead  
with this ill conceived project.

Sincerely

William and Vivian Shanney

## Margallo, Sydney

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:44 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: Public Comments to the BCHD DEIR

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**From:** Bill Kelley <billkelley@me.com>  
**Sent:** Wednesday, June 9, 2021 4:24 PM  
**To:** EIR <eir@bchd.org>  
**Subject:** Public Comments to the BCHD DEIR

To: Nick Meisinger

WK-1 My family and I live in the surrounding neighborhood to the proposed project. We have serious concerns about the size and scope of this massive project. I am afraid it will drastically impact our quality of life in a negative way. Traffic, congestion, noise, air quality, overcrowding, and the vision of this huge megastructure dropped into a residential neighborhood. This would be totally out of character in this neighborhood.

WK-2 The surrounding streets are already crowded with traffic. Adding the additional vehicles to construct and support the proposed site would result in gridlock.

WK-3 Why not spend the BCHD funds in a distributed fashion by placing a number of smaller Service Centers at multiple sites in Manhattan Beach, Hermosa Beach, and Redondo Beach. The existing site has been manageable, but this project as a singular megasite is ill advised. We hope that the City of Redondo Beach will enforce their General Policy Plan article  
WK-4 1.46.4.

Sincerely,  
William Kelley  
510 Harkness Lane  
Redondo Beach CA 90278