

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 7 – Office of Regional Planning  
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*Making Conservation  
 a California Way of Life.*

June 10, 2021

Ed Almanza  
 Beach Cities Health District  
 1200 Del Amo Street  
 Redondo Beach, CA 90277

RE: Beach Cities Health District (BCHD) Healthy  
 Living Campus Master Plan – Draft  
 Environmental Impact Report (DEIR)  
 GTS # 07-LA-2019-03517  
 SCH # 2019060258  
 Vic. LA-1/PM: 20.327  
 LA-107/PM: 3.352

Dear Ed Almanza:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project would redevelop the existing BCHD campus located at 514 North Prospect Avenue as well as the adjacent vacant lot located at the intersection of Flagler Lane & Beryl Street. The implementation of the BCHD Healthy Living Campus Master Plan would occur over two phases separated by a period of 5 years. Phase 1 would include the development of a 203,700-square-foot (sf) Residential Care for the Elderly (RCFE) building with 157 Assisted Living units, 60 relocated Memory Care units, 14,000 sf of space for the Program of All-Inclusive Care for the Elderly (PACE), 6,270 sf for BCHD's Community Services, 9,100 sf for the Youth Wellness Center, and 292,500 sf for a parking structure. Following initial construction and the relocation of existing uses to the new RCFE Building, the 5-story Beach Cities Health Center and the attached maintenance building would be demolished. New development under Phase 2 would include 37,150 sf for the Wellness Pavilion, 31,300 sf for the Aquatics Center, and 20,000 sf for the Center for Health and Fitness. The BCHD is the Lead Agency under the California Environmental Quality Act (CEQA).

EG-1

The project is located approximately 3,500 feet away from the State Route (SR-1) and Herondo Street intersection. It is also located approximately 1.5 miles away from the State Route 107 (SR-107) and W 190<sup>th</sup> Street intersection. Caltrans wrote a letter in response to the Notice of Preparation for this project in July 2019. Since then, the implementation deadline for Senate Bill (SB) 743 has passed. As mentioned in the DEIR, SB 743 mandates that Vehicle Miles Traveled (VMT) be used as the primary metric to determine a project's transportation impacts, as opposed to Level of Service (LOS). Thus, Caltrans has reviewed this project from a VMT perspective.

EG-2

We support the complete streets elements that this project has incorporated, such as the tree-lined pedestrian promenade and the numerous bicycle facilities, including parking, showers, lockers, and a repair station. These elements will reduce VMT and Greenhouse Gas (GHG) emissions, which aligns with Caltrans' mission to provide a safe and reliable transportation network that serves all people and respects the environment.

EG-3

We also support Mitigation Measure T-1, which is the implementation of a Transportation Demand Management (TDM) plan, to reduce the VMT impacts of this project. If not already planned, BCHD should

EG-3 (cont.) consider creating a specific VMT reduction goal for this plan, to better evaluate its success and revise it if needed. Also, to further reduce the VMT impacts of this project, BCHD should ensure that no more parking than required by the local permitting agency is provided, since additional parking can induce VMT.

In addition to the potential VMT impacts of this project, we reviewed the references to Caltrans data included throughout the DEIR. Many of these references are outdated. Below is a table that summarizes which references should be updated with the latest Caltrans data sources, and the pages in the DEIR where these updates should be made. Please update all of the references included in the below table.

**Table 1: Outdated Caltrans References**

| Pages with Outdated Reference  | Recommended Updates  |
|--|--|
| pg. 3.5-5<br>pg. 3.14-20<br>pg. 7-5<br>pg. 7-19  | Use more recent data from the 2020 Caltrans Fact Booklet:<br><a href="https://dot.ca.gov/-/media/dot-media/programs/research-innovation-system-information/documents/caltrans-fact-booklets/2020-cfb-v2-a11y.pdf">https://dot.ca.gov/-/media/dot-media/programs/research-innovation-system-information/documents/caltrans-fact-booklets/2020-cfb-v2-a11y.pdf</a> .   |
| pg. 3.6-11<br>pg. 3.14-16<br>pg. 7-7   | Replace 2001 Caltrans data and references to the 2006 Caltrans Highway Design Manual with data from the 2020 Caltrans Highway Design Manual:<br><a href="https://dot.ca.gov/programs/design/manual-highway-design-manual-hdm">https://dot.ca.gov/programs/design/manual-highway-design-manual-hdm</a> .  |
| pg. 3.8-15   | Ensure that the most recent Federal and State laws applicable to hazardous waste materials are listed in the DEIR by referring to the "Laws, Regulations, and Guidance" section of this page: <a href="https://dot.ca.gov/programs/environmental-analysis/standard-environmental-reference-ser/volume-1-guidance-for-compliance/ch-10-hazardous-materials-hazardous-waste-contamination#laws_reg_guidance">https://dot.ca.gov/programs/environmental-analysis/standard-environmental-reference-ser/volume-1-guidance-for-compliance/ch-10-hazardous-materials-hazardous-waste-contamination#laws_reg_guidance</a> .  |
| pg. 3.11-4<br>pg. 3.11-14<br>pg. 3.11-15<br>pg. 7-14   | Update all references to the Caltrans Transportation and Construction Vibration Guidance Manual to the April 2020 version: <a href="https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf">https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf</a> .   |
| pg. 3.11-3<br>pg. 3.11-46<br>Noise citation on pg. 7-14 and citations throughout the Noise section | Update noise references to either the September 2013 Caltrans Technical Noise Supplemental to the Traffic Noise Analysis Protocol ( <a href="https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf">https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf</a> ) or the April 2020 Caltrans Traffic Noise Protocol ( <a href="https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/traffic-noise-protocol-april-2020-a11y.pdf">https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/traffic-noise-protocol-april-2020-a11y.pdf</a> ). |

EG-9 Also, the title page appears to be missing signatures, and the cover page does not list any responsible agencies. Caltrans recommends including this information in the Final EIR.

EG-10

Finally, any transportation of heavy construction equipment and/or materials that requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods. If construction traffic is expected to cause issues on SR-1 or Interstate 405, please submit the Construction Traffic and Access Management Plan to us for our review.

If you have any questions regarding these comments, please contact project coordinator Emily Gibson, at [Emily.Gibson@dot.ca.gov](mailto:Emily.Gibson@dot.ca.gov) and refer to GTS # 07-LA-2019-03517.

Sincerely,

*Frances Duong*

FRANCES DUONG  
Acting IGR/CEQA Branch Chief  
cc: Scott Morgan, State Clearinghouse



# Torrance Unified School District

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TIMOTHY H. STOWE Ed D

April 28, 2021

Nick Meisinger  
Wood Environment & Infrastructure Solutions, Inc.  
9177 Sky Park Court  
San Diego, California 92123  
Via Email: EIR@bchd.org

Subject: Comments on BCHD Healthy Living Campus Master Plan EIR (State Clearinghouse No. 2019060258)

Dear Mr. Meisinger:

Torrance Unified School District (TUSD) is a reviewing agency under the California Environmental Quality Act (CEQA) for Beach Cities Health District's (BCHD) Healthy Living Campus Master Plan Project (Project). The Project site is southwest of the intersection of Flagler Lane at Beryl Street in the City of Redondo Beach. The Project proposes redevelopment and expansion of the existing BCHD campus, including a new 157-unit assisted living facility. TUSD operates public K-12 schools within the City of Torrance and is responsible for the safety and well-being of students and employees on school grounds. TUSD has reviewed the Draft Environmental Impact Report (EIR) prepared for the Project and offers the comments herein.

The Project site and proposed project construction haul routes are identified in DEIR Figure 2-10, *Construction Haul Routes*. As shown, they are in close proximity to the following TUSD campuses:

|   | Distance from<br>Project Site | Distance from<br>Proposed Haul Route |
|---|-------------------------------|--------------------------------------|
| <b>Towers Elementary School</b><br>(5600 Towers Street, Torrance, CA 90503) | 300 ft E                      | Adjacent to<br>Outbound Route        |
| <b>West High School</b><br>(20401 Victor Street, Torrance, CA 90503)        | 0.5 mi SW                     | Adjacent to<br>Inbound Route         |
| <b>Magruder Middle School</b><br>(4100 185th Street, Torrance, CA 90504)    | 1.8 mi NE                     | Adjacent to<br>Inbound Route         |

Construction activities and construction vehicles have the potential to indirectly affect TUSD schools, especially at these three campuses. Construction activities may generate excessive noise and vibration, expose the public and surrounding uses to hazardous materials, interrupt school drop-off / pick-up activities, and increase pedestrian-vehicle conflicts.

1. **Adopted Haul Routes.** The City of Torrance and City of Redondo Beach have adopted truck routes.<sup>1,2</sup> The Project does not comply with the City of Torrance established routes. Two proposed segments identified in DEIR Figure 2-10 are not shown in the City of Torrance Established Truck Routes map:
- The segment of Beryl Street, between Flagler Lane and West 190<sup>th</sup> Street, adjacent to Towers Elementary School is not an established truck route.
  - The segment of Prairie Avenue, between West 190<sup>th</sup> Street and Artesia Boulevard, adjacent to Magruder Middle School is not an established truck route.

KB-3 Accordingly, TUSD requests that both of these street segments be eliminated as proposed construction haul routes. TUSD further requests that all construction-related vehicles be prohibited from traveling on these roadway segments. The outbound haul route on DEIR Figure 2-10 shall be amended to direct vehicles from the Project site to travel north on Prospect Avenue and turn right on West 190<sup>th</sup> Street, which is an approved truck route by both cities of Torrance and Redondo Beach. Inbound construction vehicles using the Artesia Boulevard exit on I-405 may continue westbound on Artesia Boulevard and turn left on Hawthorne Boulevard; Artesia and Hawthorne Boulevard have been identified as approved truck routes by both cities. Conformance with this request would reduce potential impacts at Tower Elementary School and eliminate potential impacts Magruder Middle School.

2. **Stationary Noise and Vibration Effects.** Due to the proximity of the Project site to Towers Elementary School, TUSD requests that construction activities that generate the greatest noise and vibration impacts (i.e., building demolition and grading activities) occur when students are not in school. This may include after school hours, on Saturdays, or during school breaks. For those activities that cannot be scheduled outside of school hours, TUSD requests that BCHD coordinate with the Principal of Towers Elementary to ensure that construction noise and vibration impacts do not occur on important test days.

3. **Vehicle-Pedestrian Conflicts.** The Project includes a weekday construction schedule of 7:30 a.m. to 6:00 p.m. TUSD is concerned that the increased vehicle and truck traffic near its schools may disrupt and delay drop-off and pick-up activities at its schools. TUSD requests that DEIR Mitigation Measure NOI-1, Construction Noise Management Plan, be updated to limit construction vehicles from traveling on Del Amo Boulevard and West 190<sup>th</sup> Street 15 minutes before and after the school start and end bells at Tower Elementary School and West High School. Conformance with this request would minimize potential delays of drop-off and pick-up activities and vehicle-pedestrian conflicts.

TUSD appreciates this opportunity to comment on the Project. Please contact the undersigned at 301.972.6062 or butler.keith@tusd.org if you would like to further discuss these comments.

Sincerely,



Keith Butler, Ph.D.  
Chief Business Officer

<sup>1</sup> Torrance Established Truck Routes:

<https://www.torranceca.gov/home/showpublisheddocument/2782/636302198759830000>

<sup>2</sup> Redondo Beach Designated Truck Routes: [http://www.qcode.us/codes/redondobeach/view.php?topic=3-7-9-3\\_7\\_903](http://www.qcode.us/codes/redondobeach/view.php?topic=3-7-9-3_7_903)

## Navarro, Ashlyn

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**From:** EIR <eir@bchd.org>  
**Sent:** Tuesday, June 15, 2021 1:28 PM  
**To:** Meisinger, Nick  
**Subject:** Fw: 2021 BCHD Draft EIR  
**Attachments:** 2021 BCHD DEIR Letter - Nick Meisinger.pdf; 2021 BCHD DEIR Comment Letter Attachment.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:** Briseno, Isela <IBriseno@TorranceCA.gov>  
**Sent:** Thursday, June 3, 2021 2:59 PM  
**To:** Tom Bakaly <Tom.Bakaly@bchd.org>  
**Cc:** EIR <eir@bchd.org>  
**Subject:** 2021 BCHD Draft EIR

Good afternoon,

PF-1 | Please see attached letter from City of Torrance mayor, Patrick J. Furey and comments (Attachment A). Original letter with printed copy of Attachments A and B were mailed yesterday via USPS to Mr. Nick Meisinger.

Thank you,

**Isela Briseno**

Staff Assistant – Office of the City Manager

City of Torrance | 3031 Torrance Boulevard | Torrance CA 90503 | 310.618.2801 voice | 310.618.5841 fax | IBriseno@TorranceCA.gov  
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MAYOR

CITY COUNCIL MEMBERS  
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GEORGE CHEN  
TIM GOODRICH  
MIKE GRIFFITHS  
SHARON KALANI  
AURELIO MATTUCCI

June 2, 2021

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).

PF-2

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 A).

PF-3

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.

PF-4

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.

PF-4  
(cont.)

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.

PF-5

Thank you for your attention to these comments. Also attached are comment letters received that are pertinent to the Draft EIR (Attachment B), available online at [www.TorranceCA.gov/BCHD](http://www.TorranceCA.gov/BCHD). 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:

- A. City of Torrance Comments on the Draft EIR
- B. Comment Letters (available online at [www.TorranceCA.gov/BCHD](http://www.TorranceCA.gov/BCHD))

## 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*

PF-6 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*

PF-7 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*

PF-8 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*

PF-9 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*

PF-10 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*

PF-11 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*

PF-12

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*

PF-13

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*

PF-14

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*

PF-15

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*

PF-16

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*

PF-17

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

PF-17  
(cont.)

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.

PF-18

#### *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.

PF-19

#### *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*

PF-20

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**

PF-21

#### *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

PF-21  
(cont.) 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**

PF-22 *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**

PF-23 *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.

PF-24 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.

PF-25 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).

PF-26 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*

PF-27 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

PF-28 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*

PF-29 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

PF-30 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.

PF-31 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*

PF-32 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*

PF-33 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)*

PF-34 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)*

PF-35 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)*

PF-36 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)*

PF-37 Provide additional information that Flagler Lane south of Beryl Street is a local street.

**Public Services**

PF-38 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*

PF-39 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.

PF-40 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*

PF-41 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*

PF-42 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.



**Bill Brand**  
Mayor

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June 8, 2021

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

RE: Review and Comments on Draft Environmental Impact Report (EIR) for the proposed Beach Cities Health District Healthy Living Campus

Dear Mr. Meisinger:

On behalf of the City of Redondo Beach, California, please accept this letter as the City's official written comments on the Draft Environmental Impact Report (DEIR) for the Beach Cities Health District (BCHD) Healthy Living Campus Master Plan.

WB-1 The City of Redondo Beach, as a Responsible Agency for the project, appreciates being notified of the DEIR and being provided an opportunity to submit feedback on the California Environmental Quality Act (CEQA) review of the proposed project. The City respectfully submits these comments to BCHD, as the Lead Agency for the project, for consideration in the environmental analysis to be included in the Final Environmental Impact Report (FEIR).

WB-2 BCHD has proposed a two-phase development which generally includes in Phase 1 a new Residential Care Facility for the Elderly (RCFE), a space for the Program of All-Inclusive Care for the Elderly (PACE), space for Community Services, and a Youth Wellness Center. The entirety of Phase 1 is proposed to be 233,070 square feet of space. In the DEIR, Phase 1 is evaluated at a project level of detail, whereas Phase 2 was reviewed at a programmatic level of detail, since the specific details for Phase 2 have not yet been planned. Phase 2 is expected to have a new Wellness Pavilion, Aquatic Center, and a relocation of the Center for Health and Fitness back on campus. It is during Phase 2 that the parking structure is proposed. The project proposes the redevelopment of Phase 1 to occur over 29 months and Phase 2 over 28 months.

WB-3 The DEIR addresses Phase 2 at a programmatic level, but there are significant details that were not evaluated since that phase is not fully determined, especially regarding which parking typology would be implemented. Any future consideration for

WB-3  
(cont.)

development of Phase 2 should begin with a comprehensive environmental analysis in the form of a Subsequent EIR to ensure that the potentially significant impacts are appropriately mitigated. A Subsequent EIR would provide for public noticing and allow those who may potentially be impacted an opportunity to comment.

The City of Redondo Beach is very concerned with the Project's significant impacts regarding the following land use implications:

WB-4

- The DEIR has mitigation measure MM VIS-1 to reduce the building height. The implementation of this mitigation measure may reduce concerns of privacy and possibly shade/shadow effects. However, by solely mentioning the reduction of the height of the building as a mitigation measure, yet not addressing this specific mitigation measure of reduced height as an Alternative, it seems that future mitigating redistribution of the square footage would result in unstudied implications, potentially creating unknown impacts. The potential environmental impacts of the height reduction and the options of redistributing the square footage should be studied in the DEIR. Although the DEIR did consider Alternative 6 as a reduced height option (that was determined not preferred), that does not address how the MM VIS-1 will be met under the proposed project. The DEIR gives general comments on how there would be reductions in construction impacts due to the reduced number of floors to be built, but doesn't address how or if the square footage would be constructed otherwise. If this square footage is to be distributed elsewhere on the site, the various categories of impacts should be evaluated. The proposed project should be reviewed with consideration of the execution and impacts of implementing MM VIS-1.

WB-5

- All of the "build" Alternatives presented in the DEIR expect that the floor area ratio (FAR) on that site will exceed 0.5 FAR on the Flagler Lot. However, as noted in the DEIR, that is not allowed per the Redondo Beach Municipal Code. The DEIR assumes throughout the Land Use and Planning analysis chapter that this project is allowed since "the Redondo Beach General Plan Land Use Element allows for the development of housing for senior citizens by permitting such housing to vary from the development standards in the zone in which it is located..." Yet, the C-2 Zoning site (Flagler Lot) is clearly described as being used as support facilities rather than housing for senior citizens. Exceeding the FAR would require a zoning variance, with distinct criteria that must be met. The DEIR does not explain the impacts to the Project if findings for a variance cannot be made. There should be an Alternative that addresses meeting the restriction of 0.5 FAR in the C-2 Zoning.

WB-6

- The DEIR acknowledges that there would be a Redondo Beach Planning Commission Design Review required for this project. There is a Conditional Use Permit requirement, as well. The RBMC does not specify maximum FAR, height restrictions or setbacks in the P-CF Zone, but rather leaves that determination to the Planning Commission Design Review. Yet, the DEIR seems to assume that because the Redondo Beach Municipal Code doesn't specify these and

WB-6  
(cont.)

otherwise leaves the determination up to the Planning Commission, that there would not be a height or FAR or setback limit imposed. The DEIR should address the uncertainty resulting from the discretion of the Planning Commission, and potential project response alternatives.

In addition to the significant concerns noted above regarding Land Use, Attachment A to this letter details additional comments from the City of Redondo Beach that should be addressed in the Final EIR document.

WB-7

These comments are to address the CEQA-required DEIR document and the environmental impacts. As a Responsible Agency, the City of Redondo Beach will address any municipal application(s) related to the project presented in this DEIR through the appropriate discretionary approval process. If there are any questions for the City of Redondo Beach regarding this comment letter, please contact Community Development Director Brandy Forbes by email at [brandy.forbes@redondo.org](mailto:brandy.forbes@redondo.org) or by telephone at (310) 318-0637 x2200.

Sincerely,



Mayor William Brand

cc. City Council Members, City of Redondo Beach  
Joe Hoefgen, City Manager, City of Redondo Beach  
Brandy Forbes, Community Development Director, City of Redondo Beach

**ATTACHMENT A**  
**Comments on DEIR for proposed Beach Cities Health District Healthy Living Campus**

|       | <b>Section/Page</b>                     | <b>Comment</b>   |
|-------|---|--|
| WB-8  | [General]                               | There are several reports listed throughout that would need to be prepared as part of mitigation measures. Those should be listed along with when each particular report would be due.   |
| WB-9  | [General]                               | There are several references to the Redondo Beach Municipal Code (RBMC) Section 10-5. This is the coastal zoning and does not apply to this site. Rather, the RBMC 10-2 is applicable since this site is not within the coastal zoning. Although often these codes parallel each other, there are some differences. BCHD should do a search of the document to ensure that all references are corrected, and when language from the code is directly included in the DEIR, verify that the text is correct based on RBMC 10-2. |
|       | <b><u>Executive Summary Section</u></b> |  |
| WB-10 | ES-16                                   | Regarding MM GEO-2a, although the workers may be trained or educated for awareness of paleontological resources, there does not seem to be a consequence if the workers don't stop the job. The document points out on page 3-3 that mitigation measures must be fully enforceable, but there does not appear to be an insurance of such for this mitigation measure.  |
| WB-11 | ES-29                                   | The Mitigation Measure states that compliance with the City's construction hour regulations will be, "to the maximum extent feasible, in accordance with RBMC..." It is unclear why "to the maximum extent feasible" is needed if it is going to follow the construction hour regulations. This should be clarified or just acknowledge that the project will be in compliance with the construction hour regulations.   |
| WB-12 | ES-40                                   | Under the last bullet point on this page, it states that work within the public right-of-way outside of the hours would require issuance of an after-hours construction permit. In Redondo Beach, that is issued by the Public Works Department, Engineering Division rather than the Community Development Department.  |
| WB-13 | ES-41                                   | The second to the last bullet notes that Approvals may take up to 2 weeks per each submittal, but it is unclear which approvals are referenced. Various agencies and City divisions may have different timeframes. It seems more appropriate to note approximate timeframes rather than appearing to limit an agency when the District doesn't have that authority.  |

WB-14 | ES-43 | There is mention of increase in water demand under Impact UT-2, but there is not mention of having to comply with the City's adopted Model Water Efficiency Landscape Ordinance (MWELo). The MWELo does need to be followed.

WB-15 | ES-46 | The table on this page lists the Project and Alternatives 1-5 (Alternative 1 being the No Project Alternative), but is missing Alternative 6. Therefore, this impact comparison table is only useful in comparing the Project to the No Project Alternative, but it is unclear which of the other alternatives was excluded in order to determine what Alternatives 2-5 are. Without this table being accurate, it is more cumbersome to compare the various Alternatives from the text.

Readers Guide Section

WB-16 | RG-17 | In the last paragraph under 3.9, there is mention of 0.30 to 1.50 inches of rainfall, but it doesn't explain if that is a rate (i.e., per hour) or overall total. This should be clarified in the Final EIR.

Introduction Section

WB-17 | I-5 | There isn't mention of the required Planning Commission Design Review in addition to the Conditional Use Permit. As well, bullet #3 only mentions the P-CF zone, but not the zoning on the Flagler Lot (C-2), which also must get permits.

WB-18 | I-5 | The bullet addressing shared parking would be the Redondo Beach Planning Division oversight, not the Building & Safety Division.

Project Description Section

WB-19 | 2-36 | The bicycle facilities listed don't describe if they are available to the general public or to just the employees. This should be clarified to determine the extent of the benefit of these amenities. In the table on page 3.10-30 it states that shower and locker facilities for visitors and employees would be provided. This should be clarified and consistent throughout.

WB-20 | 2-37 | A "gas yard" is shown on the various site plans throughout the document. However, there does not appear to be a description of it or explanation of the mechanical equipment and any impacts it may have. It seems this may fit under utilities and services, but it is unclear since not described. The impacts of this gas yard should be evaluated.

WB-21 | 2-37 | An "electrical yard" is shown on the various site plans throughout the document. However, there does not appear to be a description of it or explanation of the mechanical equipment and any impacts it

WB-21  
(cont.)

may have. It seems this may fit under utilities and services, but it is unclear since not described. The impacts of this electrical yard should be evaluated.

2-39

Under Section 2.5.1.6 Construction Activities, the following should be considered for addressing construction impacts:

- Maintain ingress/egress of construction vehicles to be from the southerly and northerly driveways. Do not use signalized access for construction activities, maintain it for staff and clients/guests of BCHD. Also, this minimizes construction activity conflicts with pedestrian and transit operations/stop activities adjacent to signalized site entrance.
- Consider interim preferential (permit) parking along westerly Prospect (Beryl to Diamond), Prospect frontage road, and surrounding streets (i.e. first blocks of Diamond and Beryl). This will keep BCHD employees, guests/visitors and construction workers from parking in the residential neighborhood streets.
- Provide dust and noise screening/blankets along project periphery.

WB-22

#### Environmental Impact Analysis and Mitigation Measures Section

3-3

At the bottom of the page there is mention that a Mitigation Monitoring and Reporting Program will be provided following public review. As noted in a previous comment, it is critical that there is a listing of all of the expected reports to be prepared and the specific triggers/due dates of those reports so that tracking of such can be in one location.

WB-23

#### Aesthetics and Visual Resources Section

3.1-21

Under the goals and policies listed, a few additional citations should be added. Specifically, Goal 1K and Objective 1.46 which correspond to Policies 1.46.4, & 1.46.5, Objective 1.53 which corresponds to Goal 1N and Policies 1.53.6, 1.53.7, 1.53.10, and 1.53.11, and Goal 1O which corresponds to Objective 1.57 and Policies 1.57.3 and 1.57.4.

WB-24

Goal 1K "Provide for public uses which support the needs and functions of the residents and businesses of the City."

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."

WB-24  
(cont.)

Objective 1.53 “Attain residential, commercial, industrial and public buildings and sites which convey a high-quality visual image and character.”

WB-25

3.1-21 Policy 8.2a.8 is not applicable to the site. This policy as well as the overarching objectives and goals are only specifically applicable to the Coastal Area of the city.

WB-26

3.1-38

MM VIS-1 is a mitigation measure to reduce the building height. The implementation of this mitigation measure may reduce concerns of privacy and possibly shade/shadow effects. That was not discussed under the “Residual Impacts” heading on this page. As well, by not addressing this required mitigation measure of reduced height as an Alternative, it seems that how the square footage would otherwise be distributed may have implications on other impacts.

WB-27

3.1-56

In terms of Aesthetics, the last paragraph on page 3.1-56, the Parks and Recreation Element shouldn’t be applicable to this site as it is not dedicated parkland.

WB-28

3.1-70

The paragraphs under VIS-4 mention how both the 121.5’ building and the 133.5’ building create a 404.5’ shadow during the Winter Solstice. It seems that the 133.5’ building would create a shadow longer than the 121.5’ building. This should be explained or corrected.

WB-29

[General]

To adequately assess potential impacts to Aesthetic and Visual Resources, additional visual representations need to be included in the form of conceptual design renderings and photo simulations that demonstrate compliance with the cited Goals, Objectives, and Policies as well as noted design related Redondo Beach Zoning Ordinance “criteria”. Conceptual renderings and photo simulations of the “project” and “alternatives” are necessary to adequately assess potential impacts and determine if additional mitigation is required. Additionally, a conceptual rendering and photo simulation of the project with the determined mitigation (MM VIS-1) also needs to be included in the FEIR.

WB-30

Biological Resources Section

3.3-12

Policies 1.55.8-1.55.10 from the Land Use Element should be added which align with the City’s and State’s MWELo goals.

Cultural Resources and Tribal Cultural Resources Section

WB-31 | 3.4-8, There is a reference to the Redondo Beach Preservation Commission reviewing the historic status of the medical buildings, however, it does not appear that those buildings have been formally reviewed at a public hearing. It would be more accurate to state that the medical buildings are not identified as potential resources in the City's Historic Resource Survey and do not meet the criteria outlined within the Preservation Ordinance.

WB-32 | 3.4-10 The property 328 N. Gertruda Avenue is referenced (Table 3.4-1) as a designated resource nearby, however, this is only one of many properties within the Gertruda Avenue Historic District. Please reference the entire district.

WB-33 | 3.4-11 The property at 820 Beryl Street is listed as a designated resource (Table 3.4-1) near the project site. Please clarify that this is a potentially historic resource within the City survey, but is not currently designated as a local landmark. This is further supported by the fact that within Table 3.4-1, there is no given name to the site - the formal name is assigned at the time of designation.

#### Geology and Soils Section

WB-34 | 3.6-25 MM GEO-1 says that the Cities' compliance staff "shall observe and ensure compliance". That is not the authority of BCHD. Rather BCHD will comply with the recommendations and specifications with Cities' having oversight and enforcement capabilities.

WB-35 | 3.6-30 As noted previously regarding MM GEO-2a, although the workers may be trained or educated for awareness of paleontological resources, there does not seem to be a consequence if the workers don't stop the job. The document points out on page 3-3 that mitigation measures must be fully enforceable, but there does not appear to be an insurance of such for this mitigation measure.

WB-36 | 3.6-30 Although MM GEO-2a notes that workers will be trained, there doesn't seem to be a contingency for employees that may be hired mid-project after the initial training has been conducted.

#### Greenhouse Gas Emissions and Climate Change Section

WB-37 | 3.7-15 Include City of Redondo Beach General Plan Policy 16 can be included which states, "Encourage flex hours in work environments."

WB-38 | 3-7 Project 12. Description should be changed to Slurry Seal roadway. This is completed. Need to add the project again as Proposed for FY's 22-23 to 22-24. Caltrans will be "Resurfacing

WB-38  
(cont.)

asphalt roadway, upgrading signal systems, and implementing ADA improvements” for the entire stretch of PCH in the South Bay.

#### Hazard and Hazardous Materials Section

WB-39

3.8-10 The DEIR mentions VOCs and the need to remediate. This should be remediated to the required regulatory standards and measures in place, and ensure that future contamination does not further migrate from the possible source onto the site.

WB-40

3.8-13 There is reference the Well Review letter to address the oil well site. BCHD should properly mitigate and follow regulatory requirements and construction standards for known oil well locations.

WB-41

3.8-19 There seems to be secondary reference to the Redondo Beach Local Hazard Mitigation Plan in this particular environmental category, when it seems that this would be the most pertinent location for it to be considered as part of the environmental review. In the Geology and Soils section, the LHMP was fully consulted. Concern that the Hazards and Hazardous Materials section did not take into consideration Redondo Beach’s adopted LHMP. Torrance’s LHMP was addressed in its own subheading, so unsure why it was not considered for Redondo Beach.

#### Land Use and Planning Section

WB-42

3.10.22 Under the review of the Land Use Element and zoning, the “no conflicts” section states, “However, this portion of the proposed RCFE Building would exceed the 0.5 FAR requirement.” The next section notes a potential conflict with the same statement. On page 3.10-23 under Policy 1.5.2 it states that the Flagler Lot portion of the site will have a “portion of the RCFE Building that would support the Assisted Living and PACE services.” It seems that there will not be actual residences on the Flagler Lot. The proposed Project assumes throughout the Land Use and Planning analysis chapter that this project is allowed since “the Redondo Beach General Plan Land Use Element allows for the development of housing for senior citizens by permitting such housing to vary from the development standards in the zone in which it is located...” Yet, the C-2 site is clearly described as being used as support rather than housing for senior citizens. Exceeding the FAR would require a zoning variance, with distinct criteria that must be met. This DEIR does not address that. The DEIR does not explain the alternatives to the Project if findings for a variance cannot be made.

#### Noise Section

WB-43 | 3.11-16 | There are several Goals and Policies in the Redondo Beach General Plan related to noise, loading and deliveries, mixed use, etc. that were not included in the analysis. The Final EIR should address Goal 10.4 and Policies 10.4.1 and 10.4.5; Policies 10.5.1 and 10.5.5; Goal 10.6 and Policies 10.6.1 and 10.6.2; and Goal 10.8 and Policy 10.8.1.

WB-44 | 3.11-42 | The first paragraph lists operations that generate noise. If the Electrical Yard or Gas Yard areas will generate any noise, this should be incorporated in this Chapter and the impacts should be analyzed.

#### Population and Housing Section

WB-45 | 3.12-15 | The assumption is that the population increase as a result of residents moving into these units is a 1 for 1 replacement. However, the dwelling unit being vacated when someone moves into a unit at BCHD Project would free up for the average 2.34 persons per dwelling unit, thus creating a greater population increase.

#### Transportation Section

WB-46 | [General] | Although the VMT is addressed, there is concern about circulation in the vicinity, especially if Torrance closes south bound Flagler Lane at Beryl. Although that would not be an impact of the BCHD Healthy Living Campus project, it is important that BCHD consider how employees and visitors to the site would navigate those revised roadway configurations.

WB-47 | Page 3.14-66. | The first paragraph refers to *County Department of Transportation (DOT)*. That reference should be changed to "City of Torrance" (CDD and/or PW).

WB-48 | Page 3.14-67 | The second bullet from the top states "*Trucks shall only travel on approved construction routes. Truck queuing/staging shall only be allowed at approved locations. Limited queuing may occur on the construction site itself.*" The bullet needs to further state that "*No truck queuing/staging shall occur on any public roadway in the vicinity of the project*".

#### Utilities and Service Systems Section

WB-49 | 3.15-12 | Policy 6.1.10 should be added to this section for review for water supplies. The policy notes to examine the feasibility of using reclaimed water for irrigation for both public and private facilities.

WB-50 | 3.15-13 | For water conservation, Policy 1.55.7 regarding drought tolerant species, Policy 1.55.8 regarding drought conscious irrigation, and

WB-50  
(cont.)

Policy 1.55.9 regarding automated irrigation systems should all be added and addressed.

WB-51

3.15-27

This section of the Chapter on Utilities and Services Systems seems to have missed the City of Redondo Beach Local Policies and Regulations related to sanitary and storm. The General Plan Policies that would apply are Policy 6.1.5 regarding development contingent upon being served with sanitary sewer, Policy 6.2.3 regarding approvals of new development served with adequate storm drainage, and Policy 6.2.7 addressing improvements or expansion borne by the project proponent.

WB-52

[General]

The discussion regarding impacts on the sewer system seem to be incomplete. Although UT-3 and UT-4 address some of the impacts on the immediate sewer system and on the greater capacity for treatment, there is no mention that the City of Redondo Beach sewage collection system or Sanitation Districts of LA County transmission system were evaluated for impact. Only the end of the line JWPCP was evaluated.

#### Alternatives Section

WB-53

5-19

The first paragraph mentions the possibility of a rezoning in the closure, sale, and redevelopment alternative. This seems to be a very specific assumed outcome of what zoning might be requested. And it seems irrelevant as to whether a rezoning would “help the City of Redondo Beach to meet [the RHNA]”. There are a number of uses that could be requested and serve different purposes, so uncertain why mixed use or multifamily were called out.

WB-54

5-98

This table lists the Project and Alternatives 1-5 (Alternative 1 being the No Project Alternative), but is missing Alternative 6. Therefore, this impact comparison table is only useful in comparing the Project to the No Project Alternative, but it is unclear which of the other alternatives was excluded in order to determine what Alternatives 2-5 are. Without this table being accurate, it is more cumbersome to compare the various Alternatives from the text.