

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.

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).

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.

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

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:

- 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.
- 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.
- 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

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.

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>
[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.
[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.
<u>Executive Summary Section</u>	
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.
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.
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.
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.

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.

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

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

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.

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

#### Project Description Section

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.

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.

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

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.

#### 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.

#### 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.

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."

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

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.

- 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.
- 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.
- 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.
- [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.

#### 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

- 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.
- 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.
- 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

- 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.
- 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.
- 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

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



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

#### Hazard and Hazardous Materials Section

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

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

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.

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

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

[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.

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).

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

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.

3.15-13 For water conservation, Policy 1.55.7 regarding drought tolerant species, Policy 1.55.8 regarding drought conscious irrigation, and Policy 1.55.9 regarding automated irrigation systems should all be added and addressed.

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.

[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

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.

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.