CITY OF
TORRANCE

SHARON KALANI

MAYOR

October 28, 2026

Beach Cities Health District Board of Directors
514 North Prospect Avenue
Redondo Beach, California 90277

Re: Comments on Final Addendum to the Certified Final EIR for the Beach Cities Health District Healthy Living Campus Master Plan—Sunrise Senior Living Project (SCH No. 2019060258)

Dear Members of the Board:

The City of Torrance submits these comments on the October 2026 addendum prepared for the revised Sunrise Senior Living Project, its reliance on the September 2021 certified Final Environmental Impact Report (Final EIR), and the October 2026 *Revised Mitigation, Monitoring, and Reporting Program* (Revised MMRP). The Revised MMRP confirms that BCHD remains responsible for funding and successfully implementing all mitigation, documenting monitoring, and promptly correcting deficiencies, even when duties are delegated to Sunrise, a construction contractor, or another qualified professional. (*Revised MMRP*, pp. 1–2.) The revised project is not merely a smaller version of the approved project: it changes the design, moves the residential facility to the center of the campus, reverses the construction sequence by demolishing the Beach Cities Health Center before replacement facilities are available, displaces existing Memory Care residents, changes the mix of uses and amenities, and modifies the adopted mitigation and monitoring framework. Those changes require a transparent, quantitative comparison supported by current technical studies and an enforceable MMRP tailored to the actual revised project.

Conclusion. On the present record, the addendum does not adequately demonstrate that none of the conditions in CEQA Guidelines section 15162 has occurred. An addendum may ultimately be supportable only if BCHD supplies project-specific technical analyses, corrects the internal inconsistencies identified below, preserves all mitigation applicable to

the revised uses, and explains with substantial evidence why the newly feasible central-site/demolition-first configuration does not trigger further alternatives review.

Unless that record is developed before approval, BCHD should prepare a subsequent or supplemental EIR.

1. Governing Standard

Under CEQA Guidelines sections 15162 and 15163, additional EIR review is required when substantial project or circumstance changes require major revisions because of a new significant effect or a substantial increase in a previously identified effect, or when new information of substantial importance shows such an effect or establishes that a previously rejected mitigation measure or alternative is now feasible and would substantially reduce an impact. Section 15164 permits an addendum only when changes are necessary but none of those conditions exists. The determination must rest on substantial evidence in the whole record, not solely on generalized assertions that the project is "smaller."

2. Material Discrepancies and Unsupported Assumptions

- **Project size is not consistently compared.** Addendum Table 2 identifies the approved project as 292,150 square feet and the revised project as 279,000 square feet, a 13,150-square-foot reduction. The Final EIR, however, describes the approved Phase 1 RCFE as 203,700 square feet and the overall approved campus program as substantially larger. The addendum should identify exactly which buildings and gross-floor-area conventions produce the 292,150 square-foot build-out and separately compare Phase 1, Phase 2, and total buildout.
- **The unit count is constant, but the resident and care mix is not fixed.** The addendum repeatedly relies on the same 217-unit cap, yet it does not specify the numbers of Independent Living, Assisted Living, and Memory Care units or associated beds. The Final EIR evaluated 157 Assisted Living units/177 residents plus 60 Memory Care units/120 beds. A changed care mix can materially alter staffing, emergency-service demand, trip generation, parking, water use, wastewater, solid waste, and operational noise.
- **The project description contradicts the proposed deletion of noise mitigation.** Section 5 describes a community multi-use room, a pool, community events, and aquatic classes. Section 6 and the noise analysis nevertheless state that the outdoor pool and events are not included and delete MM NOI-3b and NOI-3c. This is a direct

inconsistency. The project must either prohibit outdoor events and outdoor pool activity through enforceable conditions or retain and update those measures.

- **Construction duration is inconsistent.** The schedule runs from third-quarter 2028 demolition through a fourth-quarter 2030 opening; Table 2 states 27 months; Section 8 describes a "2-year period"; and the analysis characterizes the schedule as two months shorter than the 29-month approved Phase 1. The addendum should provide a month-by-month schedule, phase overlap, equipment assumptions, grading quantities, truck trips, and the actual duration used in every impact model.

- **The central-site alternative has become feasible.** The Final EIR rejected demolition-first central development partly because it would add up to six months, reduce open-space utility, require lease termination, and be financially infeasible. The addendum now states that the same general configuration is feasible, lease termination is no longer financially infeasible, and construction can be shorter. That is potentially new information under section 15162(a)(3)(C), requiring a reasoned analysis of whether the now-feasible alternative would substantially reduce the Final EIR's significant construction-noise impact or other effects.

3. Adequacy of the Environmental Review

3.1 Project Description and Baseline

The revised project remains conceptual: it supplies only maximum floor area, stories, and units, without a dimensioned site plan, elevations, grading and excavation quantities, precise pool location and operating characteristics, care-level and bed allocation, employee count, parking supply, delivery/loading locations, or final construction logistics. Because those variables drive several impact conclusions, BCHD should define a binding development envelope and evaluate a reasonable worst case. The baseline must also distinguish existing physical conditions from future conditions following the separate Allcove, PACE, CHF, and Community Services relocations.

3.2 Aesthetics and Visual Resources

The addendum concludes that a five-story building capped at 82.75 feet will remain below the Palos Verdes ridgeline, but it provides no revised visual simulations, verified sightline section, finished-floor elevations, rooftop-equipment envelope, or analysis of the central building's changed orientation and massing. Revised MM VIS-1 requires the final design to avoid interruption of the Palos Verdes hills ridgeline as viewed from 190th Street and Flagler Lane and allows reductions in floor-to-ceiling height, removal of upper stories, and/or a

deeper foundation. (*Revised MMRP*, Table 1, MM VIS-1, p. 3.) That performance standard should be supported by a verified visual study under the maximum design envelope, incorporated into final plans before any demolition, grading, or building permit, and checked during construction by City permit-compliance staff. Because the measure leaves the ultimate design response open, the MMRP should identify the required sightline methodology, submittal contents, approval finding, and corrective action if the plans do not demonstrate compliance.

3.3 Air Quality, Greenhouse Gases, and Construction Health Risk

The conclusion that emissions necessarily decrease is unsupported without revised modeling. The change in sequencing, demolition method, excavation depth and volume, concrete construction, equipment fleet, truck trips, and daily overlap can affect peak-day localized emissions and health risk even if total floor area is lower. Revised MM AQ-1 requires a City-approved Air Quality Management Plan, watering and other fugitive-dust controls, wheel washing, covered loads, a 15-mph limit on unpaved roads, cessation of demolition when winds exceed 25 mph, five-minute idling limits, and USEPA Tier 4 engines for all construction equipment except crushing equipment. (*Revised MMRP*, Table 1, MM AQ-1, pp. 3–4.) The addendum should include updated construction-emissions and health-risk calculations using the actual schedule and maximum equipment assumptions; identify all current sensitive receptors, including patients and staff in Buildings 510 and 520 and nearby residences; explain and quantify the crushing-equipment exception; and require equipment documentation, daily inspection records, complaint response, and corrective action sufficient for BCHD and City staff to verify continuous compliance.

3.4 Noise and Vibration

The Final EIR's only significant and unavoidable impact was prolonged construction noise. The addendum predicts a reduction without presenting receptor-specific noise contours, equipment schedules, daily activity levels, barrier designs, or a quantitative comparison of intensity and duration. A shorter overall schedule does not establish lower peak noise. Revised MM NOI-1 requires a City-approved Construction Noise Management Plan, construction-hour limits, feasible line-of-sight noise barriers, properly muffled equipment, maximum feasible use of electric power, separation of staging and equipment from sensitive uses, advance notice within 0.25 mile, monitoring of noise and vibration, a non-automated complaint line, and a complaint log. (*Revised MMRP*, Table 1, MM NOI-1, pp. 15–17.) The MMRP, however, does not state numerical construction-noise or vibration thresholds, fixed monitoring locations and frequency, required public reporting, response deadlines, or mandatory stop-work/corrective-action triggers. Those elements are necessary, particularly for nearby residences and medical equipment in Buildings 510 and 520. In addition, the

Revised MMRP contains MM NOI-2 and NOI-3a (*Revised MMRP*, Table 1, p. 17) but does not list MM NOI-3b or NOI-3c, even though the revised project reportedly retains a pool, community multi-use room, aquatic classes, and community events. The omitted operational-noise measures should be restored and adapted unless enforceable project conditions expressly eliminate the activities they regulate.

3.5 Geology, Hazardous Materials, Cultural Resources, and Hydrology

The Revised MMRP includes requirements for geotechnical recommendations, paleontological worker training and discoveries, Native American and archaeological monitoring, hazardous-building-material surveys, contaminated-soil handling, soil-vapor monitoring and extraction, and previously unknown contamination. (*Revised MMRP*, Table 1, MM CUL-1a, CUL-1b, CUL-2, GEO-1, GEO-2a, GEO-2b, HAZ-1, and HAZ-2a–2d, pp. 5–15.) Their adequacy nevertheless depends on coverage of the revised central footprint and current conditions. MM GEO-1 refers generically to the Geotechnical Report prepared for the Project without identifying whether it evaluates the new building location, concrete structure, spread footings, finished grades, groundwater, or current seismic assumptions. (*Revised MMRP*, Table 1, MM GEO-1, pp. 7–8.) MM CUL-1a requires a monitor approved by the Gabrieleño Band of Mission Indians–Kizh Nation during ground disturbance and daily logs, while MM CUL-1b requires a Cultural Resources Monitoring Plan and Treatment Plan. (*Revised MMRP*, Table 1, MM CUL-1a and CUL-1b, pp. 5–6.) The MMRP should specify how overlapping tribal and archaeological authority, reporting, discoveries, and work resumptions will be coordinated. MM HAZ-2a contains extensive requirements for soil segregation, covered stockpiles, daily inspections, decontamination, truck loading, stormwater control, manifests, and off-site disposal, but the record should map prior borings, PCE investigation, and contaminated-soil areas against the revised excavation footprint and identify document-retention and public-reporting requirements. (*Revised MMRP*, Table 1, MM HAZ-2a, pp. 9–13.) MM HAZ-2b and HAZ-2c should state the applicable action levels, calibration and logging protocols, monitoring locations, and authority to halt and resume work. (*Revised MMRP*, Table 1, MM HAZ-2b and HAZ-2c, pp. 13–14.) The Revised MMRP identifies no avoidance or minimization measure for hydrology and water quality. (*Revised MMRP*, Table 1, p. 15.) The addendum also relies on reduced development to infer reduced runoff without providing an impervious-area comparison or preliminary drainage/LID concept demonstrating retention and treatment equivalent to the Final EIR assumptions.

3.6 Population, Public Services, Transportation, and Utilities

Reliance on the same 217-unit maximum is not a sufficient demand analysis. The Final EIR's emergency-service, traffic, employee, water, wastewater, and solid-waste estimates were tied to a defined Assisted Living/Memory Care program and bed count. The addendum introduces Independent Living without quantifying the unit mix, occupancy, staffing, emergency-call rate, or utility factors. Revised MM T-1 requires a comprehensive TDM Plan before the Conditional Use Permit, annual mode-share surveys and reports, at least biennial trip-length surveys, adaptive measures, submission to the BCHD Board and City, and public availability. (*Revised MMRP*, Table 1, MM T-1, pp. 17–20.) The MMRP should add measurable VMT or trip-reduction objectives, survey-quality standards, implementation deadlines for corrective measures, and consequences for persistent underperformance. Revised MM T-2 requires a Construction Traffic and Access Management Plan, designated haul routes, on-site staging and worker parking, flaggers and traffic controls, public-right-of-way work generally between 9:00 a.m. and 4:00 p.m., agency and neighborhood notice, a complaint line, and multiple permits. (*Revised MMRP*, Table 1, MM T-2, pp. 20–22.) The analysis should quantify demolition debris, soil export, concrete deliveries, worker trips, peak truck activity, queuing, haul-route exposure, and conflicts with continued medical-office operations rather than defer those basic impact assumptions to a later plan. BCHD should also disclose the unit/bed mix and provide updated parking, emergency-service, fire-flow, water, wastewater, and solid-waste calculations. The Revised MMRP identifies no avoidance or minimization measures for population and housing, public services, or utilities and service systems. (*Revised MMRP*, Table 1, pp. 17 and 22–23.)

3.7 Flagler Lane Access, Parking Garage, and Neighborhood Traffic

Flagler Lane is a City of Torrance street. It has one travel lane in each direction, generally allows parking along the curb, and serves homes whose driveways open directly onto the street. The eastern edge of the campus is also partly within Torrance right-of-way along Flagler Lane and Flagler Alley. The addendum does not describe in detail the relocation of the project's garage access to Flagler Lane, which is a City of Torrance street. It does not state which turns would be allowed, who would use it, or during what hours. Because the driveway would sit on a Torrance residential street, these details directly affect Torrance residents. The addendum cannot support a finding of no new impact without them.

Per Torrance Municipal Code 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." Any proposed access to Flagler Lane would require an amendment to the Torrance Municipal Code. An amendment to the Torrance Municipal Code would be considered new information requiring preparation of a subsequent EIR. The City asks BCHD to study and disclose the following, using current traffic counts on Flagler Lane and nearby Torrance streets:

- **Resident driveway access.** How the garage driveway would affect residents entering and leaving their own driveways on Flagler Lane, including sight distance, turning conflicts, and delays during busy periods.
- **Vehicle queues.** How many vehicles would line up to enter the garage during shift changes, visitor peaks, deliveries, and events, and whether the line would extend onto Flagler Lane or back to Beryl Street.
- **Turning movements and nearby intersections.** Peak-hour operations and safety at Flagler Lane and Beryl Street, Flagler Lane and Towers Street, and other nearby intersections, including any left-turn exit from the garage.
- **Cut-through traffic.** Whether drivers leaving the garage would use Torrance residential streets as shortcuts. This concern was raised during the original environmental review and has not been answered for the revised project.
- **Emergency access.** Response routes for fire, police, and ambulance vehicles, and whether queues or blocked sight lines on Flagler Lane could slow them.

Any driveway approach, curb cut, striping change, signal, or other work in Torrance right-of-way requires City review and permits. The City asks BCHD to evaluate placing all garage and delivery access on the Prospect Avenue side of the campus, such as the existing main entrance, or limiting any Flagler Lane driveway to emergency use. If BCHD proceeds with a Flagler Lane driveway, the MMRP should include enforceable operating conditions. Examples include limits on delivery and service hours, on-site space for vehicles waiting to enter, shielded lighting, noise limits for garage equipment, and traffic counts after opening, with BCHD paying for corrective measures if the counts show problems.

Additionally, a Flagler Lane driveway would require major changes to the existing slope along the eastern edge of the campus, and the addendum does not describe or analyze them. The soil in this area is sandy and loose, so it would need to be stabilized before a driveway could be built. This work would likely include a site-specific geotechnical investigation, excavation and regrading of the slope, and an engineered retaining wall with deep footings or soil anchors. It would also need a drainage system, such as subdrains behind the wall and surface drains connected to the storm drain, to prevent water buildup, erosion, and slope failure. Utilities along the street may have also to be relocated. This work would add

construction noise, dust, truck trips, and temporary lane and parking closures on Flagler Lane, and it would change how stormwater leaves the site over the long term. Because the slope and the work area are partly within Torrance right-of-way, the work would also require City review and permits. The City asks BCHD to provide a geotechnical report for the Flagler Lane access, along with grading, retaining wall, and drainage plans. BCHD should also analyze the construction and runoff effects on Torrance residents before any approval is considered.

3.8 Bicycle Facilities on Flagler Lane and Flagler Alley

The City of Torrance has not approved any bicycle path, bicycle lane, or related street change in its right-of-way on Flagler Lane or Flagler Alley. In November 2022, the Torrance Public Works Department decided not to allow BCHD's proposed bicycle path and lanes on Flagler Lane after a Traffic Commission hearing. The City received 115 emails, and 79 of them opposed the project. During the meeting, 14 speakers opposed the project and only 3 supported it. That decision reflects the City's responsibility for the safety and operation of its own streets.

If BCHD intends to rely on or pursue bicycle improvements on Flagler Lane or Flagler Alley, the City asks BCHD to take one of the following two approaches:

- **Remove the improvements.** Take them out of the project and out of every impact and mitigation calculation, because they cannot be delivered without Torrance approval.
- **Study the improvements fully.** If they remain in the project, analyze safety, loss of on-street parking, travel lane width, conflicts with residential driveways and the garage driveway, emergency vehicle access, school routes, and visibility at Towers Street and Beryl Street. Any proposal must also go to the City for review through its normal public process, including Traffic Commission review and notice to affected Torrance residents, before any design is treated as final.

The City is not commenting here on bicycling in general. The City's concern is that a facility on a Torrance street must be reviewed and decided by Torrance, with neighborhood input and a full safety analysis.

4. Mitigation Measures and Enforceability

The Revised MMRP states that its monitoring table identifies each measure's full text, monitoring/reporting actions and timing, responsible parties, and enforcement agencies. (*Revised MMRP*, p. 2.) It usefully supplies those categories for the listed measures, but it

does not consistently provide objective completion criteria, documentation to be retained, inspection frequency, public availability, response deadlines, or escalation and stop-work procedures. BCHD's introductory statement that it remains responsible for funding and successful implementation, documentation of monitoring, and prompt correction of deficiencies should be converted into operative requirements applicable to every measure and incorporated into all agreements with Sunrise and its contractors. (*Revised MMRP*, pp. 1–2.) BCHD should also publish a redline against the previously adopted MMRP and a disposition table identifying each measure as unchanged, revised, added, or deleted, with a substantial-evidence explanation and an equal-or-greater-effectiveness finding for every modification. The Revised MMRP contains MM NOI-1, NOI-2, and NOI-3a, but does not list MM NOI-3b or NOI-3c. (*Revised MMRP*, Table 1, pp. 15–17.) The final MMRP should bind BCHD, Sunrise, all successors, contractors, tenants, and operators; identify permit-stage prerequisites; require dated compliance records and regular public posting; authorize unannounced inspections; and specify corrective action, work suspension, and City enforcement for noncompliance.

5. Appropriateness of Addendum

The revised project's lower height, reduced total program, central location, and elimination of the large Phase 2 facilities may reduce several impacts and could support an addendum if substantiated. The present addendum and Revised MMRP, however, do not supply the quantitative, project-specific evidence or complete enforcement framework needed to make this finding. Most critically, the record acknowledges that a previously rejected central-site/demolition-first alternative is now feasible but does not analyze whether that alternative, or a modified version, would substantially reduce the significant and unavoidable construction-noise effect. It also relies on inconsistent project descriptions, omits operational-noise mitigation despite retaining potentially covered activities, and assumes reductions in emissions, runoff, trips, service demand, and utility use without calculations. Although the Revised MMRP identifies responsible and enforcement parties and contains substantial construction controls, many measures defer essential standards to later plans or omit measurable thresholds, reporting frequency, public disclosure, and corrective-action triggers. These deficiencies implicate CEQA Guidelines section 15162 and should be resolved through a subsequent or supplemental EIR unless a revised addendum, supporting studies, and strengthened MMRP conclusively demonstrate no new or substantially more severe significant effects and no newly feasible impact-reducing alternative.

The addendum also does not disclose or analyze the Flagler Lane garage access, and it does not state whether bicycle facilities in Torrance right-of-way are part of the revised project. These omissions are additional reasons that further review is needed before approval. (See Sections 3.7 and 3.8.)

6. Requested Actions

1. Do not approve the addendum or Revised MMRP in their current form.
2. Correct the square-footage, schedule, use, and mitigation inconsistencies and provide a complete, binding revised project description.
3. Release updated visual, air-quality/health-risk, construction-noise/vibration, geotechnical, hazardous-materials, drainage, transportation/VMT, parking, emergency-service, and utility analyses.
4. Disclose the full Independent Living/Assisted Living/Memory Care unit and bed mix, staffing, operations, pool and event program, and relocation assumptions.
5. Restore and adapt MM NOI-3b and MM NOI-3c unless enforceable project conditions expressly prohibit the activities they regulate.
6. Publish a redline and disposition table comparing the adopted and Revised MMRPs, with substantial-evidence findings for every retained, modified, added, or deleted measure.
7. Add objective performance standards, inspection and reporting frequency, records-retention and public-posting requirements, complaint-response deadlines, corrective-action triggers, and stop-work or enforcement procedures to each measure where applicable.
8. Require all mitigation plans and compliance records—including air-quality, noise, cultural-resource, hazardous-materials, TDM, and construction-traffic materials—to be submitted before the applicable permit or activity and made readily available to the public, subject to lawful confidentiality limits.
9. Reevaluate alternatives in light of the addendum's admission that the formerly rejected central-site/demolition-first configuration is now feasible, including whether further design, sequencing, or construction-method changes could reduce significant construction noise.
10. Remove Flager Lane access in its entirety. If proceeding with conceptual Flagler Lane access, Addendum should be revised to include an overview of project requirements that would be necessary in order to allow the possibility of such Flagler Lane Access and provide dimensioned plans and operating details for every garage and service driveway on Flagler Lane, and analyze effects on Torrance residents' driveway access, vehicle queues, sight distance, turning conflicts, noise, lighting, and parking and

assess the all potential environmental impacts that would result from modifications to the existing sloped planter areas on the west side of Flagler Lane.

11. Evaluate placing garage and delivery access on the Prospect Avenue side of the campus. Add enforceable operating conditions and post-opening traffic monitoring, with BCHD funding any corrective measures.
12. State in the revised addendum whether any bicycle, pedestrian, striping, parking removal, or street closure work in Torrance right-of-way is part of the project or relied on in any analysis, and either remove it or analyze it fully. Confirm that no work in Torrance right-of-way may proceed without City review, permits, and public process, and that the City has not approved any such work.
13. If the updated record cannot demonstrate that CEQA Guidelines section 15162 is inapplicable, prepare and circulate a subsequent or supplemental EIR before project approval.

These comments are based on the information made available in the Final EIR and addendum. I request that BCHD include this letter and all referenced materials in the administrative record, provide written responses to the issues raised, and continue the decision until the public has a meaningful opportunity to review any revised technical analyses, project description, MMRP, and CEQA determination.

Cited document: Beach Cities Health District, *Revised Mitigation, Monitoring, and Reporting Program: Healthy Living Campus Master Plan—Revised Sunrise Senior Living Facility* (October 2026) ("Revised MMRP"). Page references correspond to the numbered pages of the Revised MMRP.

Sincerely,



Sharon Kalani, Mayor
City of Torrance, CA.



Bridgett Lewis, Councilmember District 2
City of Torrance, CA.