

Council Meeting of  
May 25, 2021

Honorable Mayor and Members  
 of the City Council  
 City Hall  
 Torrance, California

**Members of the Council:**

**SUBJECT: Community Development – Accept and File update regarding the Beach Cities Health District Healthy Living Campus Master Plan and Approve Comment Letter. Expenditure: None.**

**RECOMMENDATION**

Recommendation of the Community Development Director that City Council:

1. Accept and file an update regarding the Beach Cities Health District Healthy Living Campus Master Plan; and
2. Approve City's Draft Environmental Impact Report comment letter.

**FUNDING**

No funding is required for this action.

**BACKGROUND**

In 2017, Beach Cities Health District (BCHD) began the planning process for redevelopment of the BCHD Campus located at 514 Prospect Avenue in the City of Redondo Beach, adjacent to the City of Torrance's western border. Early planning and design phases involved development of the Healthy Living Campus Master Plan (Master Plan) and a series of community meetings and outreach efforts to gather public input.

In 2019, BCHD announced a Notice of Preparation (NOP) and that an Environmental Impact Report (EIR) would be prepared in compliance with the California Environmental Quality Act, with BCHD as the Lead Agency and the cities of Redondo Beach and Torrance as Responsible Agencies. The NOP included a public review and comment period and several scoping meetings including an interagency meeting. Staff notes recommendations were made for the environmental analysis and a comment letter prepared by various multiple Torrance City departments was submitted (Attachment B).

Since its introduction, the Master Plan has been through several planning and design iterations with the current 2020 Master Plan proposing redevelopment in two phases (Phase 1 and 2) and construction activities occurring over 29 months and 28 months, respectively. Phase 1 involves a new Residential Care for the Elderly (RCFE) building measuring 203,700 square feet in floor area and reaching 103 feet in height above the campus ground level and 133.5 feet above a vacant lot along Flagler Lane. The RCFE building consists of 157 Assisted Living units and 60 Memory Care units, and features floor area dedicated to related programming and services. The RCFE building also proposes three new driveways along Flagler Lane, which are located in the City of Torrance right-of-way. Following construction of the RCFE building, the existing Beach Cities Health Center (former South Bay Hospital building) would be demolished providing space for open recreation as well as surface parking. Phase 2 is less defined than the project-level preliminary site development plan under Phase 1, and would include a Wellness Pavilion (up to 37,150 sf), an Aquatics Center (up to 31,300 sf), and a Center for Health and Fitness (up to 20,000

sf). Parking would be provided in a new parking structure measuring up to 292,500 sf with up to 2 subterranean levels and 8.5 above ground levels. Information on the BCHD Campus redevelopment is available online at [www.bchdcampus.org/campus](http://www.bchdcampus.org/campus).

In March 2021, BCHD released the Draft EIR (DEIR) for the current 2020 Master Plan with a 90-day public review and comment period extending from March 10 through June 10, during which BCHD is accepting written comments. Information on the DEIR and methods to submit written and oral comments is available online at [www.bchdcampus.org/eir](http://www.bchdcampus.org/eir). Staff notes upon its release announcements were also made by the Torrance City Council regarding the DEIR and public review and comment period.

### **SUMMARY**

The BCHD DEIR identifies the potential environmental impacts associated with the 2020 Master Plan, including the construction-related impacts and long-term operational impacts after construction is completed for the Phase 1 preliminary site development plan and the more general Phase 2 development program. The DEIR also included areas of community concern that were identified during the planning and design phases through community outreach and input as well as agency and public comments letters received in response to the NOP. Redevelopment of the BCHD Campus would result in significant and unavoidable construction-related noise impacts. There would also be less than significant impacts with mitigation to multiple areas including aesthetics and visual resources, air quality, biological resources, cultural resources and tribal cultural resources, geology and soils, hazards and hazardous materials, and transportation. Additionally, there would be less than significant impacts (without mitigation) to multiple areas including energy, greenhouse gas emissions and climate change, hydrology and water quality, land use and planning, population and housing, public services, and utilities and service systems.

Since its release staff has completed interdepartmental review of the DEIR and has prepared a comment letter (Attachment A). The comment letter expresses concern with the potential significant impacts to Torrance residents living east of the BCHD Campus, and strongly urges consideration of additional alternatives and mitigation measures to lessen the potential impacts, and prevent significant and avoidable impacts. In the judgment of staff, repositioning the RCFE building further west with each floor stepping back farther from Flagler Lane as building height increases would achieve functional compatibility and consistency in scale, mass, and character with the residential neighborhood to the east. Doing so may also provide the best opportunity for mitigating significant and avoidable construction noise impacts. Staff also notes that access to Flagler Lane is prohibited per Torrance Municipal Code Section 92.30.8 and that the proposed driveways be eliminated from the design.

In addition, staff notes the environmental analysis prepared for Phase 2 is vague and found to be inconsistent throughout the DEIR, and that any future consideration for development of Phase 2 should begin with a comprehensive environmental analysis in the form of a Subsequent EIR, as it is evident Phase 2 may have significant effects not discussed in the DEIR. Staff strongly recommends that in preparation of the Subsequent EIR all stakeholders be reached and engaged, particularly those that live near the BCHD Campus. Considering the aforementioned concerns with future Phases, staff notes an Addendum is considered inappropriate and would not provide for public noticing nor a fair opportunity to receive input from Torrance residents living near the BCHD Campus.

The DEIR comment letter identifies multiple areas of the Draft EIR that require correction, further analysis and suggests modifications, where appropriate that would assist with addressing the project's significant impacts. Staff has also prepared a cover letter that may be signed by the Mayor on behalf of the City Council to convey the concerns your honorable body may have with the associated project. Lastly, staff notes public comments received with respect to the DEIR are attached to the letter to also convey community input and concerns.

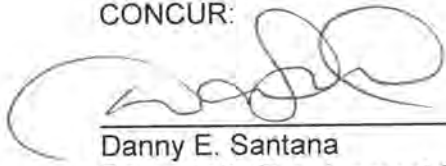
**RECOMMENDATION**

Recommendation of the Community Development Director that City Council accept and file an update regarding the Beach Cities Health District Healthy Living Campus Master Plan and approve the City's comment letter.

Respectfully submitted,

Danny E. Santana  
Community Development Director

CONCUR:

  
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Danny E. Santana  
Community Development Director

By   
\_\_\_\_\_  
Oscar Martinez  
Planning and Environmental Manager

  
\_\_\_\_\_  
Aram Chaparyan  
City Manager

Attachment:

- A. Torrance BCHD Draft EIR Comment Letter (May 2021)
- B. Torrance BCHD Scoping Notice Comment Letter (July 2019)

**DRAFT**

&gt;&gt;MAYOR / COUNCIL LETTERHEAD&lt;&lt;

&gt;&gt;DATE&lt;&lt;

Nick Meisinger, Environmental Planner  
Wood Environment & Infrastructure Solutions, Inc.  
9177 Sky Park Court  
San Diego, CA 92123

**RE: Healthy Living Campus Draft Environmental Impact Report**

Dear Mr. Meisinger,

On behalf of the City of Torrance, I am writing in regard to the Draft Environmental Impact Report (Draft EIR) prepared for the Beach Cities Health District (BCHD) Healthy Living Campus Master Plan (Project).

The City of Torrance appreciates being notified of the Draft EIR, and as a Responsible Agency, has prepared comments that are focused on the shortcomings of the Draft EIR, and include recommendations for additional alternatives and mitigation measures (Attachment 1).

After careful review of the Draft EIR, the City of Torrance is very concerned with the Project significant impacts to Torrance residents living east of the Project site. The City of Torrance strongly urges consideration of additional alternatives and mitigation measures to lessen the potential impacts, and altogether prevent significant and avoidable impacts. Repositioning the Residential Care for the Elderly (RCFE) building further west with each floor stepping back farther from Flagler Lane as building height increases would achieve functional compatibility and consistency in scale, mass, and character with the residential neighborhood to the east. Doing so may also provide the best opportunity for mitigating significant and avoidable construction noise impacts. Consideration that is more thoughtful should also be made regarding access to Flagler Lane, which is prohibited per Torrance Municipal Code Section 92.30.8.

In addition, the environmental analysis prepared for Phase 2 is vague and found to be inconsistent throughout the Draft EIR. Any future consideration for development of Phase 2 should begin with a comprehensive environmental analysis in the form of a Subsequent EIR, as it is evident Phase 2 may have significant effects not discussed in the Draft EIR. The City of Torrance has many mechanisms at its disposal to reach Torrance residents and businesses, and it is strongly recommended that in preparation of the Subsequent EIR all stakeholders be reached and engaged, particularly those that live near the Project site.

**DRAFT**

Lastly, considering the aforementioned concerns with future Phases, an Addendum is considered inappropriate and would not provide for public noticing nor a fair opportunity to receive input from Torrance residents living near the Project site.

Thank you for your attention to these comments. Also attached are comment letters received that are pertinent to the Draft EIR (Attachment 2). If there are any questions for the City of Torrance, please do not hesitate to contact Oscar Martinez, Planning and Environmental Manager of the Community Development Department, by email at [OMartinez@TorranceCA.gov](mailto:OMartinez@TorranceCA.gov) or by telephone at (310) 618-5990.

Sincerely,

Patrick J. Furey, Mayor  
City of Torrance

cc: Tom Bakaly, BCHD CEO (sent via email to: [tom.bakaly@bchd.org](mailto:tom.bakaly@bchd.org))

Attachments:

1. City of Torrance Comments on the Draft EIR
2. Comment Letters



## City of Torrance

### Comments on the Draft Environmental Impact Report (Draft EIR) prepared for the Beach Cities Health District (BCHD) Healthy Living Campus Master Plan (Project)

#### Executive Summary

##### *Alternatives Analysis*

Table ES-2 Identification of Environmentally Superior Alternative (also shown as Table 5.5.-5 Impact Comparison of Alternatives to the Proposed Project) does not include the impact comparison of Alternative 6 to the proposed Project. The Draft EIR should be reviewed to include Alternative 6 in the impact comparison of alternatives to the proposed Project.

#### Project Description

##### *Section 2.2.2 Surrounding Land Uses*

The description of zoning and land use designations surrounding the Project site is incorrect. The single-family residences east of the Project site are within the R-H/R-1 Zone (Hillside and Local Coastal Overlay Zone (Hillside Overlay) / Single Family Residential District) and have a General Plan land use designation of R-LO (Low Density Residential). Towers Elementary School is located approximately 330 feet east of the Project site and is within the P-U Zone (Public Use District). The City of Torrance would consider these uses altogether to be sensitive receptors and should be considered as such within the context of the environmental analysis.

##### *Section 2.5.1.2 Project Architecture and Design*

The Draft EIR incorrectly references Torrance Municipal Code Section 13.9.7, powers and duties of the Traffic Commission, as the sole decision-making body of City of Torrance for the proposed RCFE Building. As identified in Section 2.2.5 of the Draft EIR, the eastern portion of the Project site is located within the City of Torrance, and therefore development associated with the RCFE Building, such as the retaining walls located in the right-of-way, is subject to Torrance Municipal Code Section 92.13.12(d), which states that no fence, wall or hedge shall exceed eight feet and five feet in height, respectively. Any fence or retaining wall greater than eight feet and five feet in height, respectively, is subject to discretionary review by the Torrance Planning Commission (and Torrance City Council on appeal).

##### *Section 2.5.1.3 Proposed Access, Circulation, and Parking*

Coordination with the Torrance Fire Department and the Torrance Police Department is required to prepare an Emergency Response Plan should emergency access to the campus on Flagler Lane continue to be proposed, which is located in the City of Torrance. Flagler Lane south of Beryl Street is a local street, and adding commercial driveways on this road segment will be a violation of the City's Municipal Code and will conflict with the City's General Plan.

##### *Section 2.5.1.6 / Section 2.5.2.4 Construction Activities*

Figure 2-10 Construction Haul Routes and the proposed construction haul route for Phase II are not consistent with the Torrance General Plan Circulation & Infrastructure Element Figure CI-3 Truck Routes and Rail Lines, specifically the portion of Del Amo Boulevard between Madrona Avenue and Hawthorne Boulevard. The Draft EIR should be reviewed for consistency with the Torrance General Plan Circulation & Infrastructure Element Figure CI-3 Truck Routes and Rail Lines. In addition, as described in the Draft EIR the street names are incorrect.

#### Aesthetics and Visual Resources

##### *Section 3.1.1 Flagler Lane*

Description of the environmental setting along Flagler Lane is incomplete. Flagler Lane continues south of 190th Street to Beryl Street and Flagler Alley and supports the single-family residential neighborhood to the east and southeast. Flagler Lane also supports school drop-offs and pick-ups at Towers Elementary School during two periods of considerable daily use.

### *Section 3.1.1 Existing Public Views of the Project Site*

Views of the Project site were selected without consultation from the City of Torrance. The Draft EIR must consider the potential impacts to public views that would have a direct view of the Project as result of the larger and taller buildings being proposed, specifically from locations at: (1) cul-de-sac at Tomlee Avenue facing west and southwest, (2) intersection at Towers Street and Mildred Avenue facing west, and (3) intersection at Tomlee Avenue and Mildred Avenue facing west and northwest.

### *Section 3.1.2 Torrance General Plan Land Use Element*

Per Land Use Element Policy 2.3, the Draft EIR should consider the potential Project impacts on surrounding property, specifically the residential neighborhood to the east, and the potential impact of existing uses to the Project. Per Land Use Element Policy 2.5, the Draft EIR should also consider the potential impacts to landscape and hardscape buffers, specifically the slope between the Project site and the residential neighborhood to the east, to minimize adverse effects where appropriate. In addition, please note the Torrance General Plan was adopted in 2010, not 2005 as stated incorrectly in the Draft EIR.

### *Section 3.1.2 Torrance General Plan Community Resources Element*

The Community Resources Element policies and objectives are incorrectly cited in the Draft EIR and not consistent with the Torrance General Plan, specifically Community Resources Element Policy 1.2 as opposed to 2.1 listed incorrectly in the Draft EIR, and Objectives 4 and 19. Per Community Resources Element Policy 4.3, the Draft EIR should consider the potential impacts to planting of new trees and the preservation of existing street trees along Flagler Lane and Flagler Alley.

### *Section 3.1.2 Torrance Municipal Code*

The Draft EIR must include Torrance Municipal Code Section 92.30.2 to address the potential impacts on surrounding property, specifically the residential neighborhood to the east, from outside equipment and roof and wall appurtenances, such as ducts and vents, all mechanical equipment, electrical boxes, meters, pipes, transformers, air conditioners and all other equipment on the roof or walls on all Project buildings. Torrance Municipal Code Section 92.30.3 must also be included to address the potential impacts on surrounding property, specifically the residential neighborhood to the east across Flagler Lane.

### *Section 3.1.4 Impact/Mitigation Measure VS-1*

Per Mitigation Measure VIS-1, only view of the ridgeline of the Palos Verdes hills would be achieved with a revised design. The Draft EIR should consider further reduction of the RCFE building height to preserve greater panoramic view of the Palos Verdes hills as currently viewed from the intersection of 190th Street and Flagler Lane. The analysis should consider and demonstrate with visual aids/exhibits alternative methods for mitigation including repositioning the RCFE building further west with each floor stepping back farther from Flagler Lane as building height increases to maintain an existing view corridor from the intersection of 190th Street and Flagler Lane. The visual aids/exhibits should also demonstrate the potential impacts to the existing view corridor resulting from Phase II development.

### *Section 3.1.4 Impact VS-2*

Impact VS-2 is not consistent with the Torrance General Plan. The Draft EIR identifies the RCFE building will change the visual character of the Project site and surrounding areas, and identifies the RCFE building would be more visually prominent, substantially taller than the existing buildings onsite, and larger than buildings in the vicinity. Phase II development would include construction of additional buildings that are taller and have more massing than existing buildings in the Project vicinity. These structures would also be substantially closer to Torrance residences. The Draft EIR errors in stating the analysis of potential conflicts with the Torrance General Plan are limited to the proposed development within the City of Torrance right-of-way, and not the RCFE building and Phase II development. The Draft EIR should consider the entirety of the Project (Phase I and II) for potential conflicts with the Torrance General Plan, including Land Use Element Policies 2.3, 2.5, 3.1, and 11.1. These policies require the analysis to consider and demonstrate with visual aids/exhibits the potential Project impacts on surrounding property, specifically to the residential neighborhood to the east, and the potential impacts of these existing uses to the Project. The analysis should consider and demonstrate with visual aids/exhibits the potential impacts

to landscape and hardscape buffers, specifically the slope between the Project site and the residential neighborhood to the east, to minimize adverse effects where appropriate. The Draft EIR should also consider methods to mitigate potential conflicts with the Torrance General Plan to achieve consistency in scale, mass, and character with structures in the surrounding area, and visual and functional compatibility with the existing residential neighborhood to the east. The analysis should consider and demonstrate with visual aids/exhibits repositioning the RCFE building further west with each floor stepping back farther from Flagler Lane as building height increases.

#### *Section 3.1.4 Impact VS-3*

The Draft EIR states that exterior lighting will be directed or shielded so as not to disturb neighboring residential properties. This should include surface level parking lot lighting, as well as building or landscape lighting. Any lighted signage should not be too bright to cause a nuisance to neighboring residences. Impact VS-3 should include additional analysis to consider the potential Project impacts on surrounding property, specifically to the residential neighborhood to the east. The Draft EIR should demonstrate with visual aids/exhibits the increased lighting associated with the Project during nighttime construction and operation. The analysis should consider methods to mitigate potential impacts including a well-developed lighting plan and requirements for post-construction field measurements, and should consider repositioning the RCFE building further west with each floor stepping back farther from Flagler Lane as building height increases.

#### *Section 3.1.1 Sensitive Uses in the Project Vicinity / Section 3.1.4 Impact VS-4*

Identification of the potential impacts to existing solar collectors atop single-family residences is incomplete. Impact VS-4 should include additional analysis to consider the potential Project impacts on surrounding property, specifically to existing solar collectors atop single-family residences located in the residential neighborhood to the east. The Draft EIR should consider the potential impacts to existing solar collectors atop single-family residences near to the Project site, which are located at 5662 and 5629 Towers Street, within 180 feet and 510 feet, respectively, east of the Project site within the shade contour. The analysis should also consider the potential impacts to future solar collectors near to the Project site within the shade contour and the potential impacts to energy. The analysis should consider methods to mitigate potential impacts including requirements for post-construction field measurements, and repositioning the RCFE building further west with each floor stepping back farther from Flagler Lane as building height increases.

### **Biological Resources**

#### *Phase 1 Proposed Project Landscape Site Plan*

Urban coyotes are present in the region and in the area of the proposed project. Urban coyotes pose a threat to domestic pets and human pet handlers. Mitigation of urban coyotes includes reducing attractive habitat, including foliage areas used for denning, birthing, and rearing. The proposed Project is situated within a known travel corridor for urban coyotes between Dominguez Park and Wilderness Park. The proposed Project includes a landscape plan (pg. 115) that calls for a landscape buffer using a shrub and groundcover plant mix (feature no. 13). The proposed Project's structure bordering Flagler Lane would provide ample shade and privacy that when combined with a groundcover plant mix on the slope, would likely attract urban coyotes for use as a denning location. This could result in an unanticipated influx of urban coyotes into the Torrance residential neighborhood and pose a threat to domestic pets and pet handlers. It is recommended that the landscape buffer along Flagler Lane not utilize a shrub and groundcover plant mix. As an alternative, it is recommended that the proposed project consider California native plant species and drought tolerant planting, planted in a wide pattern within a synthetic or natural wood chip base or similarly exposed planting plan that is not attractive habitat for urban coyotes.

### **Geology and Soils**

#### *Section 3.6.1 Landslide and Slope Instability / Section 3.6.4 Impact/Mitigation Measure GEO-1*

The Draft EIR neglects to identify and analyze the slope bounding the Project site to the east and the series of retaining walls within the City of Torrance right-of-way along Flagler Lane and Flagler Alley. The Draft



EIR should include a slope stability analysis (i.e. global static stability, global seismic stability, and surficial stability) to consider the potential Project impacts on the slope and series retaining walls and to surrounding property. The analysis should consider methods to mitigate potential Project impacts that could cause a landslide including greater building setbacks from top of slope and new or reinforced retaining walls along the slope or regrade slope to a 2:1 (H:V) max. If slope reinforcement is found to be necessary, the analysis should include a construction cost estimate and identify which Agency (i.e. BCHD, Redondo Beach, or Torrance) will carry responsibility. The analysis should also consider and demonstrate with visual aids/exhibits repositioning the RCFE building further west with each floor stepping back farther from Flagler Lane as building height increases to minimize the potential adverse effects.

### **Hazards and Hazardous Materials**

#### *Section 3.8.4 Impact HAZ-5*

As previously commented, coordination with the Torrance Fire Department and the Torrance Police Department is required to prepare an Emergency Response Plan should emergency access to the campus on Flagler Lane continue to be proposed, which is located in the City of Torrance.

### **Land Use and Planning**

#### *Section 3.10.4 Impact LU-1*

Impact LU-1 is not consistent with the Torrance General Plan and conflicts with the Torrance Municipal Code. As previously mentioned, the Draft EIR identifies the RCFE building will change the visual character of the Project site and surrounding areas, and identifies the RCFE building would be more visually prominent, substantially taller than the existing buildings onsite, and larger than buildings in the vicinity. Phase II development would include construction of additional buildings that are taller and have more massing than existing buildings in the Project vicinity. The Draft EIR errors in stating the analysis of potential conflicts with the Torrance General Plan are limited to the proposed development within the City of Torrance right-of-way, and not the RCFE building and Phase II development. The Draft EIR should consider the entirety of the Project (Phase I and II) for potential conflicts with the Torrance General Plan, including Land Use Element Policies 2.3, 2.5, 3.1, and 11.1. These policies require the analysis to consider and demonstrate with visual aids/exhibits the potential Project impacts on surrounding property, specifically to the residential neighborhood to the east, and the potential impacts of these existing uses to the Project. The Draft EIR should consider additional methods to mitigate the potential Project impacts such as repositioning the RCFE building further west with each floor stepping back farther from Flagler Lane as building height increases.

The Draft EIR must include Torrance Municipal Code Section 92.30.2 to address the potential impacts on surrounding property, specifically the residential neighborhood to the east, from outside equipment and roof and wall appurtenances, such as ducts and vents, all mechanical equipment, electrical boxes, meters, pipes, transformers, air conditioners and all other equipment on the roof or walls on all Project buildings. Torrance Municipal Code Section 92.30.3 must also be included to address the potential impacts on surrounding property, specifically the residential neighborhood to the east across Flagler Lane, from the proposed exterior loading, unloading and storage areas, and trash storage areas along Flagler Lane.

As identified in Section 2.2.5 of the Draft EIR, the eastern portion of the Project site is located within the City of Torrance, and therefore development associated with the RCFE Building, such as the retaining walls located in the right-of-way, is subject to Torrance Municipal Code Section 92.13.12(d), which states that no fence, wall or hedge shall exceed eight feet and five feet in height, respectively. Any fence or retaining wall greater than eight feet and five feet in height, respectively, is subject discretionary review by the Torrance Planning Commission (and Torrance City Council on appeal).

The Draft EIR understates the conflict with access to Flagler Lane, which is prohibited per Torrance Municipal Code Section 92.30.8. The analysis should consider more carefully other Project alternatives that do not access Flagler Lane.

## **Noise**

### *Construction Noise Levels / Section 3.11.5 Impact/Mitigation Measure NOI-1*

Per Torrance Municipal Code Section 46.3.1 construction is prohibited on Sundays and Holidays observed by City Hall. The Draft EIR should specify in MM NOI-1 that construction is prohibited on Sundays and Holidays observed by Torrance City Hall, and that the arrival times of workers, construction vehicles and materials should adhere to the allowable hours as specified. The Draft EIR should identify which Agency (i.e. BCHD, Redondo Beach, and Torrance) will enforce construction noise violations and respond to noise complaints. The Draft EIR should also consider additional methods to mitigate significant and avoidable construction noise impacts, such as repositioning the RCFE building further west with each floor stepping back farther from Flagler Lane as building height increases. Doing so may provide the best opportunity for mitigating significant and avoidable construction noise impacts. In addition, as previously commented Figure 2-10 Construction Haul Routes and the proposed construction haul route for Phase II are not consistent with the Torrance General Plan Circulation & Infrastructure Element Figure CI-3 Truck Routes and Rail Lines, specifically the portion of Del Amo Boulevard between Madrona Avenue and Hawthorne Boulevard. The noise analysis should be reviewed for consistency with the Torrance General Plan Circulation & Infrastructure Element Figure CI-3 Truck Routes and Rail Lines.

### *Operational Noise Levels / Section 3.11.5 Impact/Mitigation Measure NOI-3*

Per Torrance Municipal Code Section 46.7.2(c) residential and commercial noise limits are adjusted during certain noise conditions. The Draft EIR should consider these noise limit adjustments to identify potential operational noise impacts such as from mechanical equipment, outdoor events, and the proposed parking structure. The analysis should consider additional methods for mitigation such as requirements for a well-developed noise attenuation plan and post-construction field measurements, and should consider restricting amplified noise at outdoor events to be allowed 7:00am to 7:00pm Sunday through Thursday and 7:00am to 10:00pm on Friday and Saturday, and limiting the number of outdoor events altogether. The Draft EIR should also consider other methods to reducing operational noise impacts such as repositioning the RCFE building further west with each floor stepping back farther from Flagler Lane as building height increases. The Draft EIR should also consider additional methods to mitigate operation noise emitted from the proposed parking structure, such as: driving surfaces should be covered with material that reduces noise from tires (screeching); and the parking structure exterior should be lined with screening materials (e.g. screen wall with planters) to reduce noise emitted from car alarms, doors closing, and radios. An acoustical consultant should be required to recommend mitigation measures to lessen the effects of noise from the structure.

## **Transportation**

### *Access to Flagler Lane / Torrance Municipal Code Section 92.30.8*

Eliminate the proposed driveways on Flagler Lane from the design (i.e. implement Alternative 3). Reflect this change throughout the entire EIR and all appendices. Per Torrance Municipal Code Section 92.30.8, “no vehicular access shall be permitted to a local street from a commercially or industrially zoned through lot which also has frontage on a major or secondary street. In no case shall a commercial or industrial lot be developed in such a manner that traffic from the commercial or industrial uses on it will be channeled onto any residential streets.” The Draft EIR (p. RG-18) implies this provision does not apply to the Project because it is not a land use within the City of Torrance. The City maintains its authority to apply the Torrance Municipal Code to a road within its right-of-way. Flagler Lane south of Beryl Street is a local street, and adding commercial driveways on this road segment will be a violation of the City’s Municipal Code and will conflict with the City’s General Plan.

Also, clearly state that the City’s trial implementation of a one-way traffic restriction on Flagler Lane is not related to the proposed development and should not be construed as a mitigation for any cut-through traffic that the proposed development will introduce.

### *BCHD Bike Path Project*

Emphasize that the BCHD Bike Path Project is independent of the proposed Project, and is already funded through a Measure M Metro Sustainability Implementation Plan (MSIP) grant, and will be implemented regardless of this Project's approval provided all necessary environmental clearances and approvals are secured from the Cities of Redondo Beach and Torrance.

### *Construction Haul Routes (Draft EIR p. 2-42)*

As previously commented, Figure 2-10 Construction Haul Routes and the proposed construction haul route for Phase II is not consistent with the Torrance General Plan Circulation & Infrastructure Element Figure CI-3 Truck Routes and Rail Lines, specifically the portion of Del Amo Boulevard between Madrona Avenue and Hawthorne Boulevard. The transportation analysis must be reviewed for consistency with the Torrance General Plan Circulation & Infrastructure Element Figure CI-3 Truck Routes and Rail Lines. The construction haul routes must avoid Torrance streets to the maximum extent possible and Torrance local collector streets entirely.

### *Vehicular Site Access (Appendix p. J-7)*

Remove the driveway on Flagler Lane. Revise the project trip distribution to eliminate all project trips assigned to Flagler Lane.

### *City of Torrance Standards for Intersection Operational Evaluation (Appendix p. J-16)*

Make the thresholds consistent with those provided by the City of Torrance in its July 29, 2019 comment letter (Appendix p. A-164).

### *Existing Roadway Facilities (Appendix p. J-18)*

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

## **Public Services**

As previously commented, coordination with the Torrance Fire Department and the Torrance Police Department is required to prepare an Emergency Response Plan should emergency access to the campus on Flagler Lane continue to be proposed, which is located in the City of Torrance. Flagler Lane south of Beryl Street is a local street, and adding commercial driveways on this road segment will be a violation of the City's Municipal Code and will conflict with the City's General Plan.

## **Alternatives**

### *Section 5.5.3 Alternative 3 – Revised Access and Circulation*

As previously commented, clearly state that the City's trial implementation of a one-way traffic restriction on Flagler Lane is not related to the proposed development and should not be construed as a mitigation for any cut-through traffic that the proposed development will introduce.

Also, the Draft EIR should consider repositioning the RCFE building further west with each floor stepping back farther from Flagler Lane as building height increases. Doing so may provide the best opportunity for mitigating the potential impacts, and altogether prevent significant and avoidable impacts.

### *Section 5.5.6 Alternative 6 - Reduced Height Alternative*

The Draft EIR should include visual aids/exhibits a three-dimensional model of Alternative 6 to demonstrate the reduced height alternative. As previously commented, the Draft EIR should consider repositioning the RCFE building further west with each floor stepping back farther from Flagler Lane as building height increases. In addition, eliminating the proposed driveways on Flagler Lane from the design. Doing so may provide the best opportunity for mitigating the potential impacts, and when combined, may prevent significant and avoidable impacts.

### *Section 5.6 Identification of Environmentally Superior Alternative*

Table 5.5.-5 Impact Comparison of Alternatives to the Proposed Project (also shown as Table ES-2 Identification of Environmentally Superior Alternative) does not include the impact comparison of Alternative 6 to the proposed Project. The Draft EIR should be reviewed to include Alternative 6 in the impact comparison of alternatives to the proposed Project.