

The 972+ page DEIR has numerous inaccuracies, deficiencies, & omissions. Here's one example of comments to 3.1 Aesthetics & Visual Resources

DEIR Reference	Deficiency/Omission	Conclusion/Action
<p>3.1 Aesthetics & Visual Resources Impact VIS-2 [Ref: Table ES-1]. “The proposed Project – including the Phase 1 preliminary development plan as well as the Phase 2 development program – would alter the visual character of the Project site and surrounding areas in Redondo Beach and Torrance. However, the proposed development would comply with the Redondo Beach and Torrance General Plans and municipal codes and would not degrade the surrounding visual character. Therefore, impacts would be less than significant.”</p> <hr/> <p>Torrance Municipal Code: [Ref. p. 3.1-25] “Policy LU.2.1 Require that new development be visually and functionally compatible with existing residential neighborhoods and industrial and commercial areas. “</p> <p>“Policy LU.3.1 Require new development to be consistent in scale, mass and character with structures in the surrounding area. “</p> <p>Redondo Beach Municipal Code: [Ref p. 3.1-21] Policy 1.46.4 “...ensure that public buildings and sites are designed to be compatible in scale, mass, character, and architecture with the existing buildings and pertinent design characteristics prescribed by this Plan for the district or neighborhood in which they are located.</p> <hr/> <p>Representative View #6, Flagler & 190th DEIR visual impact VIS-1 [Ref: Table ES-1]. “The proposed Residential Care for the Elderly Building included in the Phase 1 preliminary development plan would interrupt public views of the Palos Verdes hills from the highpoint at 190th Street and Flagler Lane. However, a reduction in the height of the building would reduce this impact to less than significant with mitigation. “</p> <hr/> <p>Appendix M: Shade and Shadow Study. Impact VIS-4 [Ref: Table ES-1]. “The proposed Project – including the Phase 1 preliminary development plan as well as the Phase 2 development program – would result in additional shading of adjacent properties. However, the extent and duration of shading would be less than significant.”</p>	<p>The RCFE Structure at 103 ft. tall built to the edge of the property to the East and North, 30 ft. above street level, are clearly not compatible or consistent in scale, mass and size with surrounding land uses. RCFE now rises 20 ft. higher from ~ 83 ft. in the 2020 “Refined” Master Plan to 103 ft. in the DEIR.</p> <p>The site is surrounded to the South, West and East by: R1 zoned single family with height limits up to 30 ft.</p> <p>To the North by Residential RMD and Light Commercial C-2, both with 30-foot height limits.</p> <hr/> <p>NO realistic visual aids of Phase 2 Structures are provided.</p> <hr/> <p>Torrance has cited in its response to the DEIR conflicts with the Torrance municipal code. Visual aids/exhibits of Phase 2 structures must be included to consider impact on surrounding property.</p> <p><i>“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.”</i></p> <hr/> <p>Key viewing locations provided are deficient and deceptive. City of Torrance NOT consulted in key viewing locations. From the vantage point of 190th and Flagler, VIS-1 DEIR, the RCFE structure appears LOWER than street level. From most any other vantage point site appears higher. Flagler and 190th is NOT the highpoint as stated in the DEIR.</p>	<p>The Aesthetic impacts of the project are “Significant”. They remain significant after proposed mitigation.</p> <hr/> <p>Phase 1 structure and Phase 2 structures (visual aids not provided) are clearly in violation of city codes on compatibility.</p> <hr/> <p>Reduce RCFE structure height and increase setbacks from edge of property to center of property.</p> <hr/> <p>Provide new KVLs that include before and after photo-simulations of Phase 2 structures.</p> <hr/> <p>Provide new KVLs from vantage points from the East, working with the City of Torrance.</p> <hr/> <p>Reissue updated DEIR, provide adequate time for decisionmakers and the public to review and comment.</p> <p>Views should include:</p> <ul style="list-style-type: none"> • Tomlee cul de sac • Towers Elementary athletic field • Towers and Mildred • Diamond St. residences <p>VIS-1: Downgrading to “Less than Significant” is arbitrary and inaccurate based on view of PV ridgeline from 190th and Flagler.</p> <hr/> <p>Reduced height mitigation should be made resulting from view locations that are non-transitory, e.g., from permanent vantage point of nearby homes, not 190th St. that represents an average 30-second view from cars in transit as stated in DEIR.</p> <hr/> <p>Inaccurate basis for view of RCFE and PV Ridgeline as highpoint KVL. Flagler and Prospect is the highpoint.</p> <hr/> <p>App. M. Shadowing impact is Significant. Shade study must show hourly ranges. DEIR does not address on-site after school activities that use the playground and field such as YMCA daycare, and athletic uses for AYSO soccer practices impacted by lack of sunlight.</p>