READER'S GUIDE

This section of the Environmental Impact Report (EIR) is provided to aid the reader in understanding the environmental issue areas that are addressed and where to find them. It is also intended to help the reader understand how the California Environmental Quality Act (CEQA) frames the discussion of each environmental issue area. The EIR takes its approach in defining the range of environmental issues analyzed from the CEQA Guidelines along with the input received from comments during the public scoping process, which are provided in **Appendix A, *Initial Study, Notice of Preparation, and Scoping Comments***. The EIR addresses the proposed Beach Cities Health District (BCHD) Healthy Living Campus Master Plan (Master Plan) and its reasonably foreseeable environmental impacts, direct as well as indirect, including its construction-related impacts and long-term operational impact after construction is completed.

The EIR addresses both phases of the proposed Master Plan. The Master Plan presents Phase 1 in the form of a preliminary site development plan. However, because Phase 2 would be developed there are uncertainties in future health and wellness programming and financing considerations, the Master Plan presents a program of anticipated uses and design objectives for Phase 2. The range of potential design scenarios for Phase 2 is depicted in the Master Plan in three example site plan scenarios which are also described in the EIR (see **Figures 2-11 through 2-13** and accompanying text in **Section 2.0, *Project Description***). The three scenarios are presented to enable the EIR to identify the potential environmental effects of the Phase 2 development program, and to illustrate the trade-offs inherent in decisions related to Phase 2 programming and design (see **Table 2-4** on **Page 2-54**). To address the potential impacts of the Phase 2 development program, the EIR analyzes operational impacts using conservative (i.e., worst-case) assumptions. For example, the daily vehicle trip generation analyzed for Phase 2 is based on the maximum square footage described for each of the proposed uses (i.e., a Wellness Pavilion of up to 37,150 sf, an Aquatics Center of up to 31,300 sf, and a new CHF of up to 20,000 sf). Similarly, the EIR analyzes potential construction-related impacts (e.g., ground disturbance) and aesthetics impacts (e.g., building height) using conservative assumptions related to maximum building footprints and maximum building heights. The ultimate site development plan developed for Phase 2 would fit within the maximum building envelope analyzed by the EIR.

Therefore, while the EIR analyzes the Phase 1 preliminary site development plan at the **project-level**, the EIR analyses the Phase 2 development program at the **programmatic level**; that is, the assessment of potential environmental effects addresses a range of possible development site plan scenarios that occur within the parameters of the proposed Master Plan. Although the EIR's analysis of Phase 1 is project-level and its analysis of Phase 2 is programmatic, the depth and

level of detail of the analysis of impacts is the same for both phases. This approach – of addressing a long-range plan such as the proposed Master Plan with a project-level design phase and a programmatic phase in a single, comprehensive EIR – is not unusual. The EIR's comprehensive approach to evaluating environmental effects of both phases of the Master Plan complies with CEQA's requirement to address *"the whole of the action"* that is presented to the decision-makers. At some time in the future, when BCHD has completed more detailed planning for the Phase 2 program and has developed a well-defined site plan, the Phase 2 site plan will be subject to the CEQA process once again. The future Phase 2 site plan would be addressed in a separate CEQA document which could take the form of an Addendum to the EIR (CEQA Guidelines Section 15164[a]), or a Supplemental EIR (CEQA Guidelines Section 15162), depending on the nature of the Phase 2 site plan, its potential range of environmental impacts and future conditions.

The Draft EIR consists of seven major sections, plus appendices. **Section 1.0, *Introduction*** describes the purpose and scope of the EIR, the public review process, and the required approvals for the proposed Project. The introduction identifies the BCHD as the *"lead agency"* and identifies the City of Redondo Beach and City of Torrance as *"responsible agencies."* **Section 1.8, *Areas of Known Public Controversy*** lists issues of concerns that have been raised by agencies and concerned members of the public to date in the public review process. **Section 1.4, *Public Review and Comments*** identifies several available methods for the public to provide formal comment on the Draft EIR.

The main body of the EIR is comprised of three sections **Section 2.0, *Project Description,* Section 3.0, *Environmental Impact Analysis and Mitigation Measures*, and Section 5.0, *Alternatives*** as described further below:

Section 2.0, *Project Description* presents detailed information about the proposed Master Plan. It identifies the project location, existing and proposed uses, proposed design elements, requested permits and approvals and other features of the proposed Project. It describes in detail the proposed Master Plan's two phases: the Phase 1 preliminary site development plan and the Phase 2 development program. The Project Description also identifies other components of the proposed Master Plan, including the Project Objectives and Design Guidelines. The Project Description as presented in the EIR is the basis for the EIR's environmental impact analysis and findings.

The largest section of the EIR is **Section 3.0, *Environmental Impact Analysis and Mitigation Measures***. This major section discusses the potential of the proposed Project to result in impacts related to a broad range of environmental topics, including aesthetics and visual resources, air

quality, cultural resources, hazards and hazardous materials, noise and vibration, transportation, and several others, each addressed in their own sub-section (e.g., **Section 3.1, *Aesthetics and Visual Resources***). The range of environmental issue areas discussed in this section is based on a preliminary analysis (i.e., the **Initial Study**), prepared as the first stage in the CEQA process, and on input received from agencies and concerned members of the public to date in the public review process (see **Appendix A, *Initial Study, Notice of Preparation, and Scoping Comments***). Each topical sub-section in turn is divided into four smaller sections that generally follow a uniform format:

1. **Environmental Setting** – Describes the current conditions related to the specific topic (e.g., air quality, noise levels, etc.) at the Project site and vicinity. The EIR identifies relevant environmental resources (e.g., **Section 3.3, *Biological Resources*** section presents an inventory of plants and wildlife known to occupy the Project site), along with other conditions that define the environmental setting or *"baseline"* against which the potential environmental impacts of the proposed Project are evaluated (i.e., the number of daily vehicle trips generated by the current uses at the BCHD campus).
2. **Regulatory Setting** – Lists relevant policies, plans and regulations (Federal, State, regional, and local) that may play a role in defining how impacts are determined to be significant, and/or reducing or avoiding impacts through regulation. The Regulatory Setting section often identifies government agencies with special expertise with respect to the environmental issue area in question (e.g., the South Coast Air Quality Management Agency as the expert agency relative to air quality issues and impacts).
3. **Impact Assessment and Methodology** – Identifies the Thresholds of Significance (see below) used to determine if the environmental impacts associated with the proposed Project are "*significant"* or *"less than significant"* and describes the methodology used to identify and evaluate the level of the environmental impacts.
4. **Project Impacts and Mitigation Measures** – Analyzes the environmental impacts of the proposed Project related to the environmental issue area being addressed and determines if the impact is significant when judged against baseline conditions and the thresholds of significance. In cases where the EIR determines that the proposed Project would have a significant impact, it presents measures (i.e., *"mitigation measures"*) that, if feasible, would avoid or substantially reduce the impact to a level that is less than significant. For each environmental issue area, the EIR discloses the impacts of the proposed Project and the level of significance after mitigation (if mitigation measures are adopted and implemented by the decision-makers). It is this disclosure of impacts, and the effectiveness of mitigation measures, that constitutes the major findings of the EIR.

Section 5.0, ***Alternatives*** is central to the EIR's analysis and role in addressing significant environmental impacts associated with the proposed Project. CEQA requires discussion of a reasonable range of feasible alternatives to the proposed Project. The core of the Alternatives section is a comparison of the alternative to the proposed Project in terms of whether they would reduce any impact of the project and whether they would meet most of the basic Project Objectives. Although they serve the same function – which is to reduce impacts – alternatives are different from mitigation measures in that they would fundamentally modify the proposed Project, while mitigation measures require adjustments to the design or the implementation of the proposed Project.

CEQA requires that the EIR base its determination of whether or not a project impact is significant on clearly stated criteria (i.e., *"significance thresholds"*). The significance thresholds used in this EIR are based on Appendix G of the CEQA Guidelines, which provides a list of generic questions intended to guide lead agencies in determining what level of CEQA documentation is appropriate for a project. (These questions are used in the Initial Study presented in **Appendix A,** ***Initial Study, Notice of Preparation, and Scoping Comments***.) The EIR follows the common practice of using those questions as a framework for addressing environmental impacts, with additional criteria provided by specific pertinent policies and regulations adopted by relevant agencies. Examples of established policies and regulations that serve as criteria are the air pollutant standards established by the South Coast Air Quality Management District and the Redondo Beach Stormwater Management and Discharge Control Ordinance. Established criteria adopted by relevant authoritative agencies such as these are used to inform application of the questions provided in Appendix G of the CEQA Guidelines as significance thresholds. Each of the sub-sections in **Section 3.0,** ***Environmental Impact Analysis and Mitigation Measures***, identifies the significance thresholds used to assess impacts related to the specific environmental issue area under consideration. They are identified in the third sub-section within a major environmental issue area heading, often immediately following the **Regulatory Setting** sub-section. The description of significance thresholds is followed immediately by the **Methodology** sub-section, which describes the sources of information used in the impact analysis, methods uses, and any specific criteria used to interpret or apply the significance threshold. The significance thresholds are used again when the EIR evaluates the effectiveness of any mitigation measures or alternatives designed to reduce or avoid potential impacts.

Impacts are measured against baseline environmental conditions, defined by CEQA as the environmental conditions existing before the proposed Project. (These baseline environmental conditions are generally defined as the conditions at the time of the issuance of the Notice of

Preparation for the EIR.) For example, traffic counts were conducted shortly after the release of the Notice of Preparation for the EIR, before the on-set of the COVID-19 pandemic in March 2020.

Many impacts can readily be addressed by standard conditions of approval and/or compliance with regulations already enforced by regulatory agencies and municipalities. This is especially true for potential impacts associated with hydrology and water quality, for example, and most of the potential impacts related to geologic hazards. The EIR's task in such cases is to evaluate the potential impact, then identify the relevant regulations and/or adopted development standards enforced by local agencies to avoid the impact, evaluate their effectiveness in mitigating the impact, and make a finding as to whether or not the impact would still be significant. The EIR also considers project design features or standard best management practices (BMPs) that can be relied on to have mitigating effects. Project design features that are explicitly identified as elements of the proposed Master Plan in the Project Description and can be relied on in the EIR's impact assessment for their mitigating effect, become binding commitments for the proposed Project upon the certification of the Final EIR and approval of the proposed Project. In cases where environmental impacts are not reduced to a less than significant level, even after compliance with regulations and the mitigating effects of project features are considered, the task of the EIR is then to identify feasible mitigation measure that can substantially reduce or avoid the environmental impact when adopted and implemented.

SECTION 2.0, *PROJECT DESCRIPTION*

The EIR gives an overview of the proposed Project in the first two pages of the Project Description, followed by an in-depth description of the Master Plan in the sub-sections that follow. **Section 2.2, *Existing Project Site Characteristics*** describes the location and characteristics of the Project site, as they exist today. The existing uses, buildings, infrastructure and programs of the BCHD campus are described in detail. **Section 2.4, *Project Objectives*** presents the three Project Pillars and six Project Objectives that were used to guide the development of the Master Plan and the alternatives. Detailed elements and features of the Phase 1 preliminary site development plan are described in **Section 2.5.1, *Phase 1 Preliminary Site Development Plan***. The EIR describes the more general Phase 2 development program in **Section 2.5.2, *Phase 2 Development Program***. Construction activities are also described in detail for the Phase 1 preliminary site development plan and the Phase 2 development program (i.e., **Section 2.5.1.6**, ***Construction Activities*** and **Section 2.5.2.4, *Construction Activities***, respectively).

SECTION 3.0, *ENVIRONMENTAL IMPACT ANALYSIS AND MITIGATION MEASURES*

Section 3.0, *Environmental Analysis and Mitigation Measures* comprises the main body of the EIR in which each of the major environmental issue areas are addressed in separate sections in the alphabetical order in which they are listed in Appendix G of the CEQA Guidelines and in the Initial Study. Each section or chapter follows the same general format, beginning with Environmental Setting, followed by Regulatory Setting, Thresholds for Determining Significance, Methodology, and Project Impacts and Mitigation Measures. Each section ends with a discussion of the potential for the proposed Project to result in Cumulative Impacts in combination with other projects causing related impacts.

The **Section 3.0.1, *Introduction*** provides information that is important to the reader's understanding of the impact classifications used in the EIR to characterize the level of a potential environmental impact.

The EIR impact discussions classify impact significance levels as:

1. **Significant and Unavoidable** – a significant impact to the environment that remains significant even after mitigation measures are applied;
2. **Less Than Significant with Mitigation** – a significant impact to the environment that can be avoided or reduced to a less than significant level with mitigation;
3. **Less Than Significant** – a potential impact that would not meet or exceed the identified thresholds of significance for the environmental topic area; and
4. **No Impact/Beneficial Impact** – no impact would occur for the environmental topic area or a beneficial effect would result.

The determinations of significance in the EIR are made based on the thresholds of significance and the applicable provisions of CEQA and the CEQA Guidelines for each environmental topic area (see **Page 3-2**).

The introductory section also lists the projects considered in the assessment of cumulative impacts in the EIR (**Section 3.0.2, *Cumulative Impacts***).

3.1 Aesthetics and Visual Resources

CEQA requires the EIR to address impacts to aesthetics and visual resources in specific ways. Appendix G of the CEQA Guidelines calls for analysis: 1) of impacts to *"scenic vistas;"* 2) to *"scenic resources within a State Scenic Highway;"* 3) *"conflicts with applicable zoning and other regulations governing scenic quality"* (for projects in urbanized areas); and 4) *"impacts to public views resulting from light or glare."* **Section 3.1, *Aesthetics and Visual Resources***

provides an analysis of each of these potential impacts. This section also discusses shade and shadow effects and other issues not required by CEQA (e.g., private views and line of sight). Because the discussion of aesthetics and visual resources can be highly subjective, standard CEQA practice commonly relies on the adopted policies and regulations of local municipalities as the criteria for determining what features in the public landscape are significant visual resources and what degree and type of effect should be considered a significant adverse impact. **Section 3.1.1**, ***Environmental Setting***, describes visual resources and visual character of the Project site and the surrounding vicinity. Not surprisingly, the visual environment of the neighborhoods and commercial area around the Project site is characteristic of a suburban environment. The BCHD campus, however, is distinct in that it presents a campus-like appearance in its arrangement of buildings related by a common institutional mission that is visually apparent to the casual observer from off-site. The existing buildings on the campus, by their scale and internal physical relationships, signal a land use that is fundamentally unlike its commercial and residential neighbors. The EIR provides representative views of the Project site as it appears today from six different viewpoints within the public realm. **Section 3.1.1, *Environmental Setting*** identifies sources of light and glare in the existing visual environment. It also depicts current conditions related to shade and shadow effects created by the existing buildings on the BCHD campus. The shade and shadow study shows that BCHD buildings, especially the 5-story Beach Cities Health Center (514 North Prospect Avenue), along with the topography of the Project site, contribute to shadows that extend off-site into the residential neighborhood and school to the northeast.

Section 3.1.2, ***Regulatory Setting***, identifies the Redondo Beach and Torrance General Plan policies and municipal code regulations related to visual resources. The Redondo Beach General Plan does not identify any designated scenic vistas or view corridors, and the Project site is not located within any of the scenic view corridors identified in the Torrance Community Resources Element. **Section 3.1.3**, ***Impact Assessment and Methodology*** presents the thresholds for determining the significance of environmental impacts to aesthetic and visual resources (from Appendix G of the CEQA Guidelines) and describes the methodologies for analyzing impacts.

- **Scenic Vistas** – The discussion of impacts to scenic vistas in CEQA is usually focused on scenic vistas that have been designated as significant visual resources by city policies or some other adopted public planning document. There are no designated scenic vistas, corridors or viewsheds in Redondo Beach or in the vicinity of the Project site. Nevertheless, the EIR identifies a nearby public viewpoint that it considers to be important because of its expansive view of the Palos Verdes hills from a well-travelled intersection at a high point within Redondo Beach (190th Street & Flagler Lane). Under existing conditions, the former hospital building on the campus rises to a height just

below the Palos Verdes Peninsula ridgeline. As shown in the simulated view of the proposed Project (Representative View 6; see **Page 3.1-35**) the proposed Residential Care for the Elderly (RCFE) Building would obstruct the view of the ridgeline, interrupting the view of the Palos Verdes hills from this public viewpoint. Although the view from the 190th Street & Flagler Lane intersection has no formal status as a designated scenic vista, the EIR identifies the obstruction of the ridgeline from this viewpoint as a significant environmental impact. To address the impact, the EIR presents a mitigation measure, which requires that the proposed RCFE Building be modified to avoid obstruction of the ridgeline as seen from this public viewpoint. MM VIS-1 (see **Page 3.1-38**) identifies the reduction in the effective visual height of the proposed building that would be necessary to avoid the impact, but does not prescribe a precise method for implementing the mitigation. Possible methods would be to remove the uppermost stories of the building, recess the building foundation into the ground surface, or a combination of these two methods.

- **Degradation of Visual Character** – The EIR provides a detailed discussion of the changes in visual appearance, and in some cases to visual character, that would occur as a result of the Project (beginning on **Page 3.1-39**). This discussion complements the previous description of the existing visual character of the site and surroundings in **Section 3.1.1, *Environmental Setting***. The EIR evaluates these changes in the visual environment to consider whether or not they constitute a *"degradation"* of visual character. The assessment of impacts then goes on to apply the standard prescribed in Appendix G of the CEQA Guidelines, applicable to projects in an urbanized area: *"If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?"* The EIR reviews the proposed Project for potential conflicts with applicable policies and zoning regulations governing scenic quality (see **Table 3.1-2** and **Table 3.1-3**). The review finds no conflicts with these applicable policies and zoning regulations, leading to the finding that changes to the visual character would not constitute significant impacts.
- **Light and Glare** – This analysis identifies potential sources of light and glare that would result from implementation of the proposed Master Plan. This discussion complements the overview of existing sources of lighting and glare in **Section 3.1.1, *Environment Setting***. New sources of lighting under the proposed Project would include vehicle headlights, outdoor lighting on buildings and on the campus grounds, and interior lighting in proposed buildings. The EIR considers the potential effects of these sources and determines that standards of the City of Redondo Beach in combination with design features of the Master Plan would effectively avoid adverse impacts such as light spillover to off-site land uses. Potential sources of glare include windows and reflective materials of building facades. The EIR explains that the Phase 1 site development plan and the Phase 2 development program would comply with Torrance Municipal Code Section 92.30.5 and further that the exterior of the proposed buildings shall be constructed of low- or no-glare materials, such as high-performance tinted non-reflective or non-mirrored glass and low reflective surfaces, with Light Reflective Values of less

than 35 percent. identify materials for building facades. Therefore, the analysis finds that potential changes in lighting and glare would not constitute significant impacts.

- **Shade and Shadow Effects** – Although not a environmental issue area included under Appendix G of the CEQA Guidelines, the contribution of the proposed Project to shade and shadow conditions is addressed through an analysis of shadows cast during the summer and winter solstices and the autumnal equinox. (In regions away from the equator, shadows are shorter during summer and longer during winter.) The EIR compares the extent of shadows cast at those times of year under existing conditions with shadows cast at the same times of the year under post-development conditions. Shadows are at their greatest extent at the winter solstice in late December. Under existing, pre-development conditions much of the adjacent Torrance neighborhood to the east is in shadow – particularly during the late afternoon hours (see **Figure 3.1-2** through **Figure 3.1-4**). The longest shadows cast during the winter solstice encroach into the residential neighborhood extent as far as Towers Elementary School due to the combined effects of the natural topography, existing buildings, and trees on the BCHD campus, and self-shading effects of homes in the residential neighborhood. With the proposed implementation of the Phase 1 preliminary site development plan, the configuration of shadows at the winter solstice would change, shifting slightly north and diminishing in some portions of Towers Elementary School (because of the removal of existing buildings on the BCHD campus) and extending farther east on the northern portion of the school site, as a result of the RCFE Building (see **Figure 3.1-5 through Figure 3.1-7**). However, the shadows would generally only extend off-site during the late afternoon hours (i.e., after 6:00 p.m. in the Summer, after 5:00 p.m. in the Fall, and after 4:00 p.m. in the Winter). Therefore, due to the limited duration of shading the analysis has determined that this impact would be less than significant.

3.2 Air Quality

The Air Quality section is a relatively complex section of the EIR because it analyzes several different kinds of impacts. It also necessarily employs a specialized technical vocabulary that uses many acronyms and technical terms. Air emissions generated by construction and operation of the proposed Project are analyzed in various ways. Air quality impacts are addressed at the regional scale of the South Coast Air Basin. However, some impacts, particularly construction emissions, are assessed at the local scale to evaluate their potential to adversely impact nearby *"sensitive receptors."* The EIR not only identifies construction emissions at the local level, but models their dispersion and potential health effects in terms of cancer risk (see **Appendix B, *Human Health Risk Assessment and CalEEMod Air Quality Calculation Results***). The analytic methods, thresholds of significance and key parameters for CEQA analysis are clearly prescribed by the South Coast Air Quality Management District, which is the regional agency that regulates air quality of the South Coast Air Basin.

The key terms used in the impact analysis are explained in detail in the EIR. **Criteria air pollutants** refers to seven specific pollutants regulated to comply with Federal and State ambient air quality standards (see **Table 3.2-1**). **Toxic Air Contaminants** (TACs), are a different group of pollutants that are regulated because of their potential health effects at the local level. TACs have been known to cause chronic and acute adverse effects on human health, including increased risk of cancer (see **Page 3.2-6**). **Localized Significance Thresholds** (LSTs) are thresholds prescribed by South Coast Air Quality Management District for evaluating potential impacts to sensitive receptors (from a given distance from construction activities) of construction emissions for a subset of criteria pollutants. **Diesel Particulate Matter** (DPM) refers to, an emission of diesel engines (e.g., of heavy construction equipment) commonly used in a **Health Risk Assessment** (HRA) to evaluate cancer risk. Other key terms used in the Health Risk Assessment are **Point of Maximum Impact** (PMI) and **Maximum Exposed Individual Resident** (MEIR).

Current air quality conditions are described in **Section 3.2.1**, ***Environmental Setting***. The relevant Federal, State, regional, and local regulations are summarized in Section 3.2.2. **Section 3.2.2, *Regulatory Setting***. **Section 3.2.2.1, *Thresholds for Determining Significance*** identifies the relevant regulatory thresholds that further build upon the questions provided in Appendix G of the CEQA Guidelines and **Section 3.2.3.2, *Methodology*** for analysis of the impacts discussed.

The EIR addresses the potential for the proposed Project to conflict with the South Coast Air Quality Management District's Air Quality Management Plan in Impact AQ-1 (beginning on **Page 3.2-24**). Additionally, the EIR addresses impacts related to criteria air pollutant emissions in Impact AQ-2 (beginning on **Page 3.2-35**) Impacts related to Results of the Health Risk Assessment related to construction DPM emissions and a discussion of non-cancerous health hazards associated with construction emissions are described under Impact AQ-4 (beginning on **Page 3.2-45**). With the implementation of an Air Quality Management Plan requiring soil stabilization measures and the use of U.S. Environmental Protection Agency Tier 4 engines impacts would be below the thresholds established by the South Coast Air Quality Management District.

The EIR also addresses operational emissions (beginning on **Page 3.2-42**), the potential for carbon monoxide (CO) *"hotspots"* near local intersections (beginning on **Page 3.2-48**) and the potential for significant impacts related to odors (beginning **Page 3.2-50**). However, each of these air quality impacts would not exceed the thresholds established by the South Coast Air Quality Management District.

3.3 Biological Resources

The Draft EIR addresses the potential of the proposed Project to impact biological resources. **Section 3.3.1, *Environmental Setting*** describes the biological resources in the vicinity and presents findings of two surveys conducted by a field biologist to identify resources on-site. **Section 3.3.2, *Regulatory Setting*** identifies Federal, State and local regulations and policies that govern biological resources. The thresholds for determining significant impacts to biological resources are presented in **Section 3.3.3, *Impact Assessment Methodology***. Because the BCHD campus is already developed, and the vacant Flagler Lot has no significant native vegetation, there is very little in the way of biological resources on the Project site. No riparian habitat, aquatic features or other sensitive natural community habitats occur on-site or in the immediate vicinity. The Project site is not a wildlife corridor or significant habitat linkage for wildlife movement or provide significant nursery habitat. The many mature trees on the perimeter offer potential nesting and roosting habitat for native and non-native birds. The EIR therefore identifies the potential to impact nesting birds, either directly or indirectly, should they be present during construction activities. This impact can be avoided through implementation of the standard mitigation measure that requires a survey for nesting birds prior to construction activities, followed by impact avoidance measures (MM BIO-1; see **Page 3.3-19**). The Cooper's hawk (*Accipiter cooperii*) is the only special-status species that has more than a low potential to use the site as potential roosting, foraging and nesting habitat. But the removal of trees and subsequent introduction of native tree species as elements of the proposed landscape plan would not significantly impact the Cooper's hawk.

3.4 Cultural Resources and Tribal Cultural Resources

Cultural resources include historic structures and objects as well as archaeological (prehistoric or historic-period) resources. Tribal resources are objects, sites, landscapes or features that have cultural value to a California Native American tribe. The Public Resources Code and CEQA Guidelines provide clear definitions for these resources and their evaluation under CEQA. This section of the EIR presents the prehistoric and historic context for cultural resources known to occur in the vicinity of the BCHD campus. The discussion presents findings of an Historic Resources Assessment of the Beach Cities Health Center and the attached Maintenance Building, which found that these structures do not have historical significance, based on Federal, State and local criteria (see **Appendix D, *Cultural Resources Technical Studies***). The EIR identifies four historically significant properties in the vicinity of the Project site (see **Table 3.4-1**) and addresses the potential for the proposed Project to adversely impact these properties. The analysis finds that in each case, the physical features that contribute to the historical integrity of

each of the four properties would not be affected by the proposed Project – particularly given that the two historically significant properties that have a view of the Project site were relocated to their current locations from other parts of Redondo Beach.

The EIR presents information on other cultural resources derived from archival records research, scholarly publications on local prehistory, history and archaeology, and in the case of tribal cultural resources, from direct formal consultation with Native American Tribe representatives. While there are no know archaeological or tribal cultural resources at the Project site, a high degree of presence and activity by Native Americans in the past in and around the South Bay (related to salt marshes, tribal villages and trade routes), indicates the possibility that resources may be present in the area. The fact that the BCHD campus has been previously graded and developed does not entirely rule out the possibility of buried resources being present, and potentially uncovered, during ground disturbance associated with the proposed redevelopment. The EIR identifies mitigation measures designed to avoid impacts to both cultural and tribal cultural resources in an integrated and comprehensive approach (MM CUL-1 and CUL-2; see **Page 3.4-26**). Potential impacts to any significant resources encountered during construction (including human remains) would be avoided and/or fully mitigated with the implementation of these measures (see **Page 3.4-27**).

3.5 Energy

Potential impacts related to energy fall into two categories: 1) impacts resulting from wasteful, inefficient, or unnecessary consumption of energy during project construction or operation; and 2) conflict or obstruction with a state or local plan for renewable energy or energy efficiency. **Section 3.5**, ***Energy*** evaluates the potential for the proposed Project to result in either of these two impacts. Energy consumption occurs due to use of electrical energy, natural gas, and fuel for transportation. **Section 3.5.1, *Environmental Setting*** describes how electrical power and natural gas are provided to the South Bay Region and the Project site, and estimates current energy consumption of the BCHD campus for electricity, natural gas, and fuel. **Section 3.5.2, *Regulatory Setting*** presents policies and regulations related to energy consumption and the thresholds for determining significant impacts related to energy are presented in **Section 3.5.3, *Impact Assessment Methodology***. The discussion of project impacts provided in **Section 3.5.4, *Project Impacts and Mitigation Measures*** addresses energy consumption during construction and in the post-construction operational stage after development of the proposed Project. As required by CEQA, the impact assessment focuses on whether or not the consumption of energy during construction is wasteful, inefficient or unnecessary, and evaluates the compliance of the proposed Project with energy reduction measures. The EIR also projects the amount of electrical

energy and natural gas that would be consumed by the proposed Project during its operation after construction (see **Tables 3.5-8** and **3.5-9**, respectively). The impact assessment again focuses on project design features (e.g., photovoltaic solar panels, solar hot water systems, energy efficient heating, ventilation and air conditioning systems, high performance insulation and energy efficient lighting and plumbing systems). The proposed Project would result in an increase in energy use at the site after completion, but the increase is relatively small (0.5 percent of electricity and 0.2 percent of natural gas consumption in Redondo Beach) and would not adversely regional or local energy supplies and capacities. As a redevelopment project in an already established urbanized environment (e.g., in contrast to a greenfield development), the net increase in daily vehicle trips generated by the uses included in the Phase 2 development program do not represent a wasteful, inefficient or unnecessary use of fuel. A review of the energy-reduction design features (and compliance with local building standards) has led the EIR to conclude that the proposed Project would not conflict with or obstruct State or local plans for renewable energy or energy efficiency.

3.6 Geology and Soils

CEQA requires analysis of the potential for the proposed Project to result in significant hazards related to geologic or soil conditions, or to impact geologic resources such as unique paleontological resources or unique geologic features. Most hazards related to geology and soils are linked to seismic conditions and the potential for significant seismic events to bring about catastrophic damage ranging from structural damage to buildings and infrastructure, or human death or injury. The EIR describes seismic conditions in regional and local terms, along with the probability of seismically induced impacts to occur at the Project site under current conditions, and the potential of the proposed Project to introduce or increase hazards during or after construction. Soil hazards include several potentially seismically induced effects (e.g., liquefaction, subsidence, lateral spreading) and soil expansion. Other hazards addressed in this section include the potential for the proposed Project to subject persons or property to tsunami impacts.

In some cases (e.g., with regard to liquefaction, landslide, slope instability, differential settlement, expansion, tsunami) the proposed Project presents no risk or a very low risk of impact because conditions for occurrence of the impact are not present at the Project site. Catastrophic failure resulting from significant seismic events is a regional hazard that potentially affects all structures. For new structures this hazard is addressed through strict compliance with current seismic standards of the California Building Code. The EIR identifies the significant public safety hazard presented by the existing condition of the former hospital building, which

was constructed over 60 years ago in compliance with the now-obsolete seismic standards in effect at that time. The assessment finds that the proposed Project would result in a significant beneficial impact through the action of removing the hazardous building and replacing it with structures built in compliance with today's seismic standards.

This section also evaluates the potential of the proposed Project to impact unique paleontological resources (i.e., fossil remains in the underlying geology that have scientific value). The EIR finds that the probability of encountering significant resources is low, based on the geologic units that underlie the site and their history of yielding few significant fossils in the area.

Key sources used to identify conditions at the site include the Geotechnical Study of the site prepared by Converse Consultants (2019), a Seismic Assessment of the Beach Cities Health Center Building, and the Redondo Beach General Plan Environmental Hazards / Natural Hazards Element. Standard and regulated methods for addressing geotechnical and soil hazards are derived from multiple sources, including the California Building Code, the Redondo Beach Municipal Code. The evaluation of paleontological resources and potential impacts draws on the archival body of paleontological research in the region and standard methodologies of the Society of Vertebrate Paleontology.

3.7 Greenhouse Gas Emissions and Climate Change

The proposed Project would generate Greenhouse Gas Emissions (GHG) during construction and in its operations after development. CEQA requires analysis of GHG emissions and a determination of whether or not they result in a significant effect. Following methods defined by the CEQA Guidelines, the EIR bases its determination on the consistency of the proposed Project with State, regional and local plans, policies and regulations adopted to reduce GHG emissions. The EIR discloses the proposed GHG emissions associated with the proposed Project. Methods of analysis used, and their basis in CEQA Guidelines and applicable plans and policies, are described in **Section 3.7.3, *Impact Assessment and Methodology***. Construction GHG emissions are presented in **Table 3.7-4** and operational emissions are presented in **Table 3.7-5**. Analysis of the consistency of the proposed Project with GHG reduction plans, policies and regulations is performed in **Table 3.7-8** and **Table 3.7-9**, and includes policies of the Redondo Beach and Torrance General Plans, the Climate Action Plans of both cities, and applicable regional GHG emissions reduction strategies (see **Table 3.7-10** and related discussion).

3.8 Hazards and Hazardous Materials

Hazardous materials are present on-site and would be present in relatively small amounts during operation after Project completion. The EIR discusses the following hazards:

- Asbestos and lead-based paint in old buildings proposed to be removed
- Abandoned oil well on Flagler Lot
- Soils contaminated with PCE from neighboring use (i.e., former dry cleaner)
- Hazardous materials routinely used in proposed uses and activities on-site (e.g., cleaning fluids, paints, etc.)

The EIR addresses the potential for the proposed Project to result in significant impacts resulting from the use, transport, disposal or presence of hazardous materials. Exposure to hazardous materials is a concern both during and after construction and to persons on- and off-site. This section addresses five categories of hazards related to the routine use of hazardous materials, as well as the potential accidental release of hazardous materials.

The handling, storage, use and transportation of hazardous materials is highly regulated by Federal, State, regional, and local agencies. Consequently, the EIR cites the regulations and oversight role of these several agencies in **Section 3.8.2**, ***Regulatory Setting***. The EIR presents extensive mitigation measures, all linked to the regulatory oversight and approval of the oversight agencies.

3.9 Hydrology and Water Quality

Section 3.9, *Hydrology and Water Quality* addresses the potential for the proposed Project to cause significant adverse impacts related to both surface water and groundwater. The two topics are related and the potential for impacts is largely a function of how storm runoff is managed by the site plan and drainage systems associated with the proposed Project. Water quality and hydrology impacts can also occur during construction activities, in addition to the long-term effects of post-development operations and activities that might involve materials or chemicals that are potential contaminants if they enter the storm drain system. The effects of construction activities and land uses on hydrology, and particularly on water quality, are highly regulated through Federal, State, regional, and local regulations that implement the Federal Clean Water Act. Consequently, the analysis of potential impacts and identification of feasible methods for their avoidance refer to adopted regulations that already exist as standard requirements and conditions of approval enforced at the municipal level. For that reason, **Section 3.9.2, *Regulatory Setting*** presents considerable background on the regulatory environment that provides the framework for impact avoidance relative to hydrology and water quality. It is preceded by **Section 3.9.1, *Environmental Setting*** which describes conditions of the hydrology and water quality in the subregion, the at the Project site, and in the surrounding vicinity including conditions related to groundwater.

Section 3.9.3, *Impact Assessment and Methodology*, is followed by the discussion of impacts, which cites the many applicable regulations that both provide criteria for defining a significant impact and the compliance mechanisms for avoiding impacts. The CEQA thresholds related to Water Quality focus on the potential for impacts related to erosion and the potential to conflict or obstruct the locally enforced water quality control plan or groundwater management plan. CEQA thresholds related to hydrology address hazards such as flooding and tsunami, or changes in the amount or rate of runoff that exceed the capacity of the stormwater drainage system.

The EIR identifies the hydrology and water quality benefits of redevelopment of the BCHD campus through the substantial increase in pervious surfaces on-site (through the creation of 114,830 square feet of open space) and construction of an infiltration system designed to retain, treat and infiltrate the 85th percentile storm, which can be expected to result in 0.30 to 1.50 inches of rainfall, into the groundwater. (The 85th percentile storm is used to represent the approximate amount of rainfall that would occur from 85 percent of storms occurring in the Los Angeles RWQCB region.) The EIR explains, in language that necessarily uses acronyms of regulatory agencies and their requirements, that avoidance of impacts to hydrology and water quality is achieved through compliance with established standards, regulations, procedures and best management practices.

3.10 Land Use and Planning

CEQA calls for analysis of the proposed Project's potential to conflict with any *"land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect"* and if so, whether such conflict would cause a significant environmental impact. This section of the EIR reviews the potential for the proposed Project to conflict with a broad range of adopted land use plans, policies and regulations, most of which were adopted by the City of Redondo Beach, but the analysis also addresses policies of the City of Torrance that may be applicable to the portion of the proposed Project in the City of Torrance right-of-way. For the determination of whether or not the Project conflicts with a given plan, policy or regulation, the EIR provides a detailed analysis of proposed Project features and components and their relationship to the intent of adopted plans, policies and regulations. Some adopted plans and policies, particularly those adopted at the State and regional levels, and many goals and policies of the General Plans, are directed at governing bodies (the cities themselves) for their implementation and may not be intended for implementation directly by individual projects. In cases where a potential conflict may arise, the EIR addresses the question of whether or not that conflict would *"cause a significant environmental effect"* based largely on the analysis of effects provided in other

sections of the EIR (e.g., aesthetics and visual resources, air quality, biological resources, noise, etc.).

The scope of this analysis is focused on *"land use"* plans, policies and regulations. Several plans, policies and regulations that are not related primarily to land use but are relevant to other environmental topics are discussed in other EIR sections.

Section 3.10.1, *Environmental Setting* provides an overview of land use throughout Redondo Beach and Torrance, with a more detailed discussion of land use in the vicinity of the Project site (see **Page 3.10-4**) and on the Project site (see **Page 3.10-5**). **Section 3.10.2, *Regulatory Setting*** describes the relevant policies and regulations at the state, regional and municipal levels that govern land use. Significance thresholds and methods of analysis are described in **Section 3.10.3, Impact Assessment and Methodology** (beginning on **Pages 3.10-15**). The impact analysis begins on **Page 3.10-16** in **Section 3.10.4, *Project Impacts and Mitigation Measures*** and is presented with the aid of several tables that address policies from several different sources (e.g., General Plans and zoning regulations). The EIR finds that the proposed Project does not conflict with any adopted plans, policies and regulations adopted for the purpose of avoiding an environmental effect. The City of Torrance has indicated their view that the project may be inconsistent with Torrance Municipal Section 92.30.8 which prohibits access *"to a local street from a commercially or industrially zoned through lot which also has frontage on a major or secondary street;"* however, this provision applies only to *"land uses within the City [of Torrance]"* (Torrance Municipal Code Section 93.30.1) and the EIR finds that any inconsistency with respect to that provision does not result to a significant environmental effect.

3.11 Noise

The EIR analyzes the potential for the proposed Project to cause impacts related to either noise or ground-borne vibration. The analysis begins with a discussion of the current noise environment, current noise sources and the level of ambient noise around the Project site. The EIR explains that various metrics are used to evaluate different types of community noise (see **Section 3.11.1, *Environmental Setting***). Ambient noise levels are commonly measured using a 24-hour average. The predominant source of ambient noise is roadway noise from vehicles. **Table 3.11-5** presents peak hour noise levels on the streets near the Project site. The text also identifies the level and frequency of noise generated by medical response vehicles visiting the site, along with other sources of noise such as noises from parking garages and onsite equipment. The EIR also identifies *"sensitive receptors,"* defined as uses that are especially noise-sensitive, primarily schools and residences. **Section 3.11.3, *Regulatory Setting*** presents various Federal, State, and municipal regulations and policies related to community noise. Both the City of

Redondo Beach and the City of Torrance establish permissible noise levels for specific land use types. However, neither city has noise level standards for construction noise, but both jurisdictions limit the hours of construction.

Section 3.11.4, *Impact Assessment and Methodology* identifies the thresholds of significance used for determining noise and vibration, and the discussion that follows reviews the applicable numerical standards for evaluating impacts compared to those thresholds. The EIR identifies two different methods for measuring vibration, one for its potential effects on persons and activities, the other to measure the potential for structural damage. The EIR describes the methods used to calculate levels of construction noise that can be expected from the Project, based on the number and types of equipment that will be active onsite and the duration of their activity. For construction noise and vibration, the EIR applies standards established by the Federal Transit Administration (FTA).

Project impacts are identified in **Section 3.11.5**, ***Project Impacts and Mitigation Measures***. Estimated construction noise levels at sensitive receptors are given in **Table 3.11-16** for Phase 1 and in **Table 3.11-17** for Phase 2. The analysis finds that construction noise levels during Phase 1 would significantly impact residences in the Torrance neighborhood to the east across Flagler Lane and Flagler Alley as well as the residences in Redondo Beach to the north across North Prospect Avenue and to the west across North Prospect Avenue. Phase 2 construction noise would also significantly impact residences in Torrance neighborhood to the east of the campus and the on-site sensitive receptors within the RCFE Building constructed during Phase 1. The level of noise would exceed the FTA construction noise standards for the duration of the construction phases. Conventional methods of mitigating construction noise impacts – placement of noise barriers on-site to block the *"line of sight"* between the noise source and receptors – can reduce noise emanating from sources at ground level, but this method is not sufficient to attenuate noise to a level below the FTA threshold. Further, noise barriers are generally infeasible above 30 feet and would not mitigate construction-related noise on the uppermost stories of the proposed buildings. The EIR discusses the limits of feasibility for mitigating this impact, but concludes that the level of construction noise will result in a significant impact, even with implementation of all feasible measures (MM NOI-1 on **Page 3.11-37**).

The EIR addresses noise on off-site roadways generated by haul trucks and other construction traffic and presents peak hour construction traffic noise levels at sensitive receptors in **Table 3.11-21**. The increase in noise generated by construction trips is 1 dBA or less, which is below the level of a perceptible change in noise level (3 dBA), and so the EIR determines that construction related trips, including haul trips, would not result in a significant impact.

Under Impact NOI-2 (see **Page 3.11-39**), the EIR calculates the level of ground-borne vibration that would be generated by construction vehicles operating during each construction phase. For each phase, the greatest vibration levels occur during site preparation activities. However, vibration levels from construction equipment and haul trips associated with BCHD development would not exceed criteria established by the FTA and impacts would be less than significant both Phases 1 and 2. According to the FTA, the proposed Project would have no impact because existing vibration exceeds the standard vibration criteria, the number of events does not increase significantly (i.e., approximate doubling of events), and the project vibration does not exceed the existing vibration by 3 dBA or more

The EIR evaluates noise generated by activities that would occur on-site after the completion of the proposed Project. These include outdoor equipment and Healthy Living Campus activities (*e.g.*, outdoor fitness classes, movie nights and other special events), delivery and service trucks, trash pickup, parking lot and parking structure noises, and the sirens of emergency medical vehicles visiting the site. The impact assessment finds there is a potential for noise from on-site activities to generate significant impacts – particularly outdoor activities using a sound amplification system – but finds that these impacts can be avoided through feasible measures to limit the amplitude, duration and timing of noise-generating activities. The EIR identifies a mitigation measure that calls for an Events Management Plan, which would establish operational procedures to limit noise levels to avoid exceeding municipal standards and require that activities onsite fully comply with the applicable municipal noise regulations (see MM NOI-3b and NOI-3c on **Page 3.11-48**). A separate measure limits the hours of deliveries by heavy-duty trucks and the amount of time truck engines are allowed to idle during deliveries (see MM NOI-3a on **Page 3.11-48**). The assessment identifies an increase in medical emergency vehicles to the site (due to the increase in assisted living care residents). However, the increased number of emergency trips would be minimal and would not significantly increase ambient noise levels in the community.

3.12 Population and Housing

In compliance with CEQA Guidelines, the EIR addresses the question of whether the proposed project would *"induce substantial unplanned population growth, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)."* The EIR also considers whether the project would *"displace substantial numbers of people or existing housing, necessitating the construction of replacement housing elsewhere)."* In addressing the first question the EIR draws on U.S. Census data as well as data and housing policies of the respective Redondo Beach and Torrance General Plans. The analysis also draws from the Southern California Association of Government's (SCAG's) regional

planning data related to current and projected population and jobs and housing demands and supply in the South Bay. Following an overview of current and projected population, jobs and housing numbers in Redondo Beach, Torrance, and Los Angeles County (see **Section 3.12.1, *Environmental Setting***), the analysis presents the projected numbers of new employees that would be supported by the proposed project, along with the increased housing demand of those new employees. The analysis specifically addresses the new housing demand in terms of the probable salary range (and therefore the range of affordable housing) of new employees (see **Section 3.12.4, *Project Impacts and Mitigation Measures***). This is followed by an analysis of the availability of housing within the affordable range in Redondo Beach or within a reasonable commute distance from the BCHD campus (based on today's trends in local job-commuter behavior). The analysis finds that the local housing supply is more than sufficient to meet the project's increase in housing demand. This is true even when other anticipated projects in the vicinity are considered.

The EIR discusses the increase in the local population that would result from the new assisted living units. The new Assisted Living units would increase the resident population by up to 177 new residents on-site. The number of new residents on-site would increase the population of Redondo Beach by 0.3 percent, a negligibly small increase that is well within the projected population growth assumed by SCAG, which in turn is based on the Redondo Beach General Plan. Future residents of the Assisted Living units would not increase the demand for local jobs, as they will not belong to the work-force population.

The analysis finds that the proposed Project would not "*induce substantial unplanned population growth*," through its proposal to provide housing for 177 residents or through its creation of approximately 170 new jobs at the campus. The population growth resulting from the proposed Project is neither *"substantial"* in its magnitude, nor *"unplanned,"* because it conforms to the General Plan and SCAG population growth projections for the City of Redondo Beach and the SCAG region.

The EIR also addresses the relocation of the current residents of the 60 Memory Care units on-site to new facilities in the new RCFE Building proposed to be completed in Phase 1. The phasing plan provides that current residents remain in place until the new units are ready to be occupied. The project would not *"displace substantial numbers of people or existing housing, necessitating the construction of replacement housing"* other than the housing proposed by the project onsite.

3.13 Public Services

The EIR addresses the question of whether the project will increase demands for public services and as a consequence lead to substantial adverse physical impacts due to the need to build new facilities or alter the existing facilities of service providers. The Public Services section examines the project's demand on fire protection services (including emergency medical services) and police services (the Initial Study determined the project would have no impacts on schools, parks and other public services). **Section 3.13.1, *Environmental Setting – Fire Protection*** discusses current demands on fire protection services in both Redondo Beach and Torrance, the facilities and personnel of the fire departments of both cities, and the average response times relative to targeted performance standards. The Redondo Beach Fire Department, which is the first responder to the Project site, achieves average response times for both fire protection and emergency medical services that are well below industry standards. The EIR estimates the increased demand generated by the project's proposed new uses, focusing on the increase in emergency medical services from the proposed 177 new assisted living residents. Based on the number of annual calls generated by current residents of the Silverado Beach Cities Memory Care Community on-site, the increased demand generated by new residents of Phase 1 would be approximately 244 new calls per year for emergency medical services. This represents an annual increase of 3 percent in the total responses by the Redondo Fire Department. Based on the assumption that new calls would be responded to from Fire Station No. 1 or 2 in Redondo Beach, 1.2 mile and 1.1 mile, respectively, from the Project site, the EIR concludes that the project will not trigger the need for new fire protection facilities, or alteration of fire protection facilities that might in turn result in substantial adverse physical impacts.

Section 3.13.5, *Environmental Setting – Police Protection* describes the resources and service levels of the City of Redondo Beach Police Department, as well as the City of Torrance Police Department. The EIR evaluates the potential increase in demands for police services based on the increased population of residents, employees and visitors to the Project site as a result of the Project. According to the Redondo Beach Police Department, the Department has no plans to expand facilities or build new facilities. Based on this evidence, the EIR concludes the Project will not result in an impact relative to the CEQA-based threshold of resulting in *"substantial adverse physical impacts associated with the provision of new or altered government facilities."*

3.14 Transportation

The EIR's discussion of impacts related to transportation addresses the relationship of the proposed Project to multiple modes of transportation – vehicular, transit, bicycle and pedestrian. Its assessment includes Project-induced trips from both construction and operations. It also

describes, at a detailed technical level, the policy basis for and methods of analyzing potential impacts related to vehicle miles traveled (VMT), CEQA's newly mandated criterion for gauging impacts related to traffic. In accordance with Appendix G of the CEQA Guidelines, the EIR discusses the potential of the proposed Project to increase hazards that might impact the circulation system, along with the potential of the proposed Project to result in inadequate emergency access. The impacts assessment also evaluates the potential of the proposed Project to result in significant environmental impacts due to a conflict with relevant transportation plans, policies and regulations.

Section 3.14.1, ***Environmental Setting***, identifies the existing conditions of all aspects of the circulation system. It describes the streets in the vicinity of the Project site sand their configurations, with special attention to local street access to the BCHD campus. It describes public transit service in the area, and it describes bicycle and pedestrian facilities. The Environmental Setting section describes the history and frequency of vehicular collisions in the vicinity, as well as the phenomenon of cut-through traffic in the nearby residential neighborhood east of the BCHD campus in Torrance. The EIR presents recent data on collisions and cut-through traffic (beginning on **Page 3.14-18**).

At **Page 3.14-21** the EIR identifies existing conditions related to VMT. The concept of VMT is first introduced on the first page of the transportation section. The Environmental Setting section presents current data on VMT State-wide, at the County level, and in Redondo Beach. Additional background information related to the policy and legislative actions establishing VMT as the metric for traffic impact assessment in CEQA is provided in **Section 3.14.2, *Regulatory Setting*** (beginning on **Page 3.14-23**). This section also presents various regional regulations and local General Plan policies that have bearing on transportation planning.

Section 3.14.3, ***Thresholds of Significance and Methodology*** presents the thresholds and identifies the methodology for the analysis of transportation impacts. As with other environmental topics, the EIR's thresholds of significance are based on the Appendix G of the CEQA Guidelines. The EIR explains that it relies on the guidance provided by California Governor's Office of Planning and Research (OPR) Technical Advisory as a source for the appropriate methods, screening criteria and metrics for determining traffic impacts. The EIR implements OPR's methods in a manner that is consistent with VMT procedures currently being considered for adoption by the City of Redondo Beach (beginning on **Pages 3.14-37**). The EIR describes in detail the extensive site-specific and Project-specific research and analysis conducted as part of the technical traffic study (Fehr & Peers 2021a) to estimate the number of daily trips and the length of trips generated by existing uses and the uses proposed by Phases 1

and 2 of the Master Plan. The total number of trips generated by the proposed Project, compared to existing trips generated by the project site, is presented in **Table 3.14-7** on **Page 3.14-43**. The analysis shows that Phase 1 of the Project reduces the number of trips from the existing trips generated by the campus, largely due to the substantially lower trip generation rate of the proposed residential use compared to the higher trip generation rate of the existing medical office use. With the addition of Phase 2, however, the proposed Project increases the number of daily trips over existing conditions by 376 trips, while reducing the AM Peak Period trips by 37 and the PM Peak Period trips by 28 trips.

In **Section 3.14.4**, ***Project Impacts and Mitigation Measures***, the EIR analyzes four categories of impacts, reflecting the four impact categories identified in the CEQA Guidelines (Appendix G).

Impact T-1 - *Impacts due to conflicts with any transportation plan, policy or regulation* (beginning on **Page 3.14-49**). The EIR reviews the proposed Project for consistency with applicable regional plans and refers to the analysis in **Section 3.10, *Land Use and Planning*** which addresses the Project's consistency with other relevant plans, policies and regulations adopted at the local level, including goals, policies and programs related to transportation management, alternative transportation and walkable communities. The EIR finds there are no significant impacts resulting from conflicts with plans, policies or regulations related to transportation.

Impact T-2 - *Impacts related to VMT, resulting from additional trips generated by the Project* (beginning on **Page 3.14-54**). The discussion of VMT analysis and methodology identifies two distinct metrics for evaluating VMT impacts. One is **Home-Based Work VMT per Employee** and the other is **Home-Based VMT per Capita** (see **Page 3.14-56**). Both metrics apply to the proposed Project because it would generate trips by employees on campus and trips generated by residents of the proposed RCFE Building. The analysis applies trip generation rates and trip length estimates derived through site-specific and use-specific research and compares the Project's Home-Based Work VMT per employee and Home-Based VMT per capita to the applicable thresholds. In both cases, the Project VMT is below the thresholds. Based on these results, the EIR determines that the Project will not result in significant traffic impacts related to VMT.

Impact T-3 - *Impacts related to hazards caused by the project*. This impact category addresses construction-related traffic, such as truck trips (beginning on **Page 3.14.61**); cut-through traffic in the nearby Torrance neighborhood (beginning on **Page 3.14-62**); access to the Project site (beginning on **Pages 3.14-64**); and internal campus circulation (beginning on **Page 3.14-67**). The

EIR finds that there would be no increase in hazards due to cut-through traffic because the Project's proposed access on Flagler Lane (exits and entries) would be controlled to prohibit turning movements into the Torrance neighborhood (see discussion beginning on **Pages 3.14-62**). The EIR identifies an extensive mitigation measure that requires specific actions to address construction-related traffic in a Construction Traffic and Access Management Plan to be reviewed and approved by the County Department of Transportation and Redondo Beach Community Development Department (MM T-2 on **Page 3.14-68**). The EIR also identifies the need to relocate the existing bus stop located on the south side of Beryl Street between the proposed driveway entrance on Beryl Street and the intersection with Flagler Lane, in order to avoid potential safety hazards related to vehicle-bus conflicts at this location. This requirement is identified in a separate mitigation measure, MM T-3 on **Page 3.14-71**. The EIR determines that with implementation of these two mitigation measures, MM T-2 and MM T-3, the impacts of the proposed Project related to hazards would be reduced to a level that is less than significant.

Impact T-4 – *Impacts resulting from inadequate emergency access* (beginning on **Page 3.14-70**). Provisions for emergency access during construction are identified in mitigation measure MM T-2, which requires an alternative entrance and secondary access to the campus during construction and procedures for coordination with local emergency service providers. The Construction Traffic and Access Management Plan prescribed in mitigation measure MM T-2 is required to address construction traffic routing and control, vehicle, bicycle and pedestrian safety, street closures and construction parking in a coordinated manner, to ensure that emergency access is not inhibited. Following construction, the campus would be accessible to emergency vehicles by its multiple access points, drop-off zone and internal circulation system (see **Page 3.14-71**).

3.15 Utilities and Service Systems

Development projects can cause environmental impacts directly or indirectly if they include or necessitate the construction of new utility or service facilities, or the expansion or relocation of facilities. New, relocated or expanded facilities are not in and of themselves an impact, but they may cause physical changes that in turn have significant environmental effects. This category of impact is more common with "greenfield" projects that have no existing utility connections prior to development. In addition to this category of impact, CEQA calls for an analysis of the availability of water supply to serve the project, along with other reasonably foreseeable developments, not only during normal years, but through multiple dry years. The project's effect on the wastewater treatment system, along with other existing and projected demands on the wastewater system, is another potential source of impact identified by CEQA. And finally,

CEQA calls for an analysis of the project's potential to generate solid waste that exceeds State or local standards, exceeds the capacity of local infrastructure (e.g., landfills), impairs the attainment of solid waste reduction goals or fails to comply with federal, state and local management and reduction statues and regulations related to solid waste.

The EIR describes the utility systems and facilities that currently serve the site. In separate subsections, it identifies the proposed Master Plan's potential to result in adverse impacts related to its service demands on the regional and local water, wastewater and solid waste systems.

Section 3.15.1, *Water Supply and Infrastructure* describes in detail the water supply system, sources of local water supply, water use trends and projected regional and local water demand. The EIR identifies current water use at the BCHD campus (see **Table 3.15-4**) and identifies a projected increase in water consumption as a result of the proposed Project (see **Tables 3.15-8** and **3.15-9**). Through its analysis of the existing and future supply, and the assurance through a "*Will Serve"* letter from the local water provider (Cal Water) that the water needs associated with the proposed Project can be met, the EIR makes the finding that the Project will not have a significant effect on water supply.

Section 3.15.2, *Wastewater Collection, Conveyance, and Treatment* describes the local wastewater treatment system, including the capacity of the sewer main that presently serves the campus. **Table 3.15-10** presents the estimated volume of wastewater generated by current uses at the BCHD campus. The DEIR's methodology for assessing the potential for impacts related to wastewater is described on **Page 3.15-38**. The projected wastewater generated by Phases 1 and 2 of the Project are presented in **Table 3.15-11** and **Table 3.15-12**, showing a net increase in wastewater over current conditions of 47,361 gallons per day. This increase in volume will not exceed the design criteria established by the City of Redondo Beach for the local sewer main. Nor would the increased volume exceed the capacity of the wastewater treatment facilities of the Joint Water Pollution Control Plant that serves the South Bay cities (see **Page 3.15-30**).

Section 3.15.3, Solid Waste Management Services describes the solid waste management system in Redondo Beach and the capacity of landfills in the region that might serve the project's solid waste disposal needs. The amount of solid waste currently generated by uses at the BCHD campus is identified in **Table 3.15-14**. The EIR's methodology for evaluating the potential for impacts related to solid waste is described on **Page 3.15-52**. The projected volume of solid waste that would be generated by the Project's proposed uses is given in **Table 3.15-15**. The DEIR determines that sufficient capacity exists in landfills serving the region to accommodate the volume generated by the Project. Compliance with State standards for solid waste management is assured through compliance with policies and standards established by the City of Redondo

Beach General Plan Solid Waste Management and Recycling Element (beginning on **Page 3.15-49**). Construction waste generated during construction of Phases 1 and 2 would be subject to the City of Redondo Beach Construction and Demolition Ordinance, which would bring the management of solid waste from construction into compliance with local standards.

The EIR explains that the Project would require only minor modifications, relocation or new connections to provide water, wastewater to meet the proposed Project's service demands. These minor modifications and connections are not substantial enough in scale to cause significant environmental effects.

SECTION 4.0, *OTHER CEQA CONSIDERATIONS*

This section addresses five topics required by CEQA.

- Significant Unavoidable Environmental Effects
- Reasons the Project is Being Proposed Notwithstanding Its Significant and Unavoidable Impacts
- Significant Irreversible Environmental Changes
- Growth Inducing Impacts
- Effects Found Not to be Significant

SECTION 5.0, *ALTERNATIVES*

The Alternatives section begins with a review of the Project Objectives (**Section 5.2**), followed by a summary of potentially significant effects (**Section 5.3**) to provide the context for the discussion of alternatives. Alternatives considered but rejected for further analysis are discussed in **Section 5.4**. The in-depth consideration and analysis of six alternatives occurs in **Section 5.5**. The six alternatives analyzed are:

- Alternative 1 – No Project Alternative (Demolish and Replace with Limited Open Space)
- Alternative 2 – Sale and Redevelopment of the BCHD Campus
- Alternative 3 – Revised Access and Circulation
- Alternative 4 – Phase 1 Preliminary Site Development Plan Only
- Alternative 5 – Relocate CHF Permanently and Reduced Parking Structure
- Alternative 6 – Reduced Height Alternative

For each of these alternatives, the EIR describes the alternative's potential environmental effects and compares the effects to those of the proposed Project. The six alternatives are briefly summarized below.

Alternative 1 No Project

If the proposed Master Plan were not implemented, BCHD would likely consider a local bond measure to fund seismic retrofit of the Beach Cities Health Center and Beach Cities Advanced Imaging Building. If funded, a retrofit project could take the place of the proposed Master Plan project. If not funded, BCHD would proceed with demolishing the Beach Cities Health Center, an action that it anticipates taking within the next two to five years, regardless of the future of the proposed Master Plan. The No Project Alternative would not introduce any new impacts that were not identified for the proposed Project. It would substantially reduce the temporary impact related to construction noise, but would still result in a significant effect of a much shorter duration. Compared to the proposed Project, the No Project Alternative would result in reduced impacts

The No Project Alternative would not accomplish any of the other basic objectives of the Master Plan. Removal of the seismic safety hazard (Project Objective 1) would occur without achieving any of the benefits provided by the other objectives. Upon demolition of the building, the demolition site would be filled and landscaped with simple turf. The vacant space area left by the demolished building would have no amenities, would not be of insufficient size to support community health programs (and there would be no revenue to support programs under this alternative), nor would it be a functional public park.

Alternative 2 Sale and Redevelopment of the BCHD Campus

The CEQA Guidelines state that "If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this 'no project' consequence should be discussed" (CEQA Guidelines, Section 15126.6(e)(3)(B). Consistent with this guidance, the EIR discusses Alternative 2, which would result in actions by others. Under Alternative 2, BCHD would sell the campus and Flagler lot properties. This alternative would likely result in redevelopment of the campus and development of the Flagler lot, but because of the uncertainty of the nature of potential future actions by others the EIR does not speculate on the consequent environmental effects. Environmental impacts could be less or greater than those of the proposed Project, depending on the uses developed and their intensity. Alternative 2 would not accomplish any of the Project's basic objectives. Redevelopment by others would likely result in demolition of the Beach Cities Health Center, eliminating the seismic safety hazard, but that is not certain. The revenue generated through sale of the properties would provide a temporary support for BCHD programs and services, but that support would be short-lived and not accomplish the Project's revenue generation objectives.

Alternative 3 Revised Access Plan

In response to the request by the City of Torrance in its response to the Notice of Preparation (City of Torrance, July 29, 2019), the EIR includes an alternative that considers no access from Flagler Street. This alternative is described and illustrated on **Figure 5-1** and includes a one-way access to the Project site from Beryl Street (as in the proposed Project) but no driveways on Flagler Lane. The internal circulation of the Master Plan is modified to accommodate this revised access plan and the proposed RCFE Building is slightly modified in its configuration as result. The modified configuration would result in a slight reduction in the planned programmable open space. Otherwise, the alternative site design is fundamentally similar to the proposed Project. Environmental impacts of this alternative are also similar to the proposed Project. The reduction in open space is not great enough to compromise its utility for community health programs and public use. This alternative would accomplish all of the basic Project Objectives in a manner similar to the proposed Project.

Alternative 4 Phase 1 Preliminary Site Development Plan Only

All six alternatives would reduce impacts. Alternatives 2, 3, 5 and 6 would further reduce impacts that are less than significant or less than significant with the mitigation measures identified in the EIR. Aside from the No Project Alternative, only Alternative 4 would substantially reduce a significant impact (significant and unavoidable construction noise) by reducing the duration of construction (eliminating altogether the second construction phase to develop Phase 2). It would be similar to the proposed Project in all other respects, with further reductions to less-than-significant impacts It should be noted that even under Alternative 4, the temporary impact of construction noise, though substantially reduced, would still be considered a significant effect during the shortened duration of construction.

Alternative 4 would not achieve all six of the Project Objectives. It would achieve objectives 1, 2 and 3:

1. Eliminate seismic safety and other hazards of the former South Bay Hospital Building (i.e., 514 North Prospect Avenue).

2. Generate sufficient revenue through mission-derived services to replace revenues that will be lost from discontinued use of the former South Bay Hospital Building and support the current level of programs and services.

3. Provide sufficient public open space to accommodate programs that meet community health needs.

Alternative 5 Relocate CHF Permanently and Reduced Parking Structure

BCHD plans to vacate the Beach Cities Health Center building in the next two to five years to eliminate exposure of its occupants to the building's seismic safety hazard. The CHF will be temporarily relocated to another location but is planned to return to the campus to occupy a new facility in the Community Wellness Pavilion proposed as an element of the Phase 2 development program. Alternative 5 considers a future scenario in which the CHF remains offsite permanently. The EIR's traffic study found that the CHF generates a relatively high number of daily trips and consequently represents a significant amount of the Master Plan's parking demand. Permanent relocation of the CHF would therefore allow the parking structure proposed as part of the Phase 2 development program to be reduced substantially in size, eliminating the need for approximately 200 spaces and allowing a reduction in height of two stories, approximately 30 feet.

This alternative would have similar environmental impacts to the proposed Project, though some environmental effects would be reduced. The reduced size of the parking structure and elimination of the 20,000 square foot facility to house the CHF from the development program would reduce the Phase 2 construction period by four to six months, with a corresponding reduction in construction-related impacts. The temporary impact of construction noise would still be significant. The reduced height would reduce the visibility of the proposed parking structure from views to the southeast in the vicinity of Diamond Street east of Prospect Avenue. This alternative would accomplish all of the basic project objectives in a manner similar to the proposed Project.

Alternative 6 Reduced Height

Alternative 6 would reduce the height of the proposed RCFE Building as a means of addressing the impact to the public view of the Palos Verdes hills ridgeline identified in the **Section 3.1, *Aesthetics and Visual Resources***. This impact is addressed in MM VIS-1, but the mitigation measure does not prescribe the method of avoiding the impact. Implementation of the mitigation measure through a project redesign that eliminates one or more floors of the building would reduce the Project's ability to accomplish Project Objective 4, to *"address the growing need for assisted living with on-site facilities."* It may also inhibit fulfillment of Project Objective 2, to "generate sufficient revenue through mission-derived services to replace revenues that will be lost from discontinued use of the former South Bay Hospital Building and support the current level of programs and services," and Project Objective 6, to "generate sufficient revenue through mission-derived services and facilities to address growing future community health needs. Mitigation Measure MM VIS-1 may lead to a project that fails to accomplish most of the

Project's basic objectives. For this reason, the EIR considers Alternative 6, which would reduce the height of the proposed RCFE Building, but instead of eliminating square footage, redistributes it as a three-story addition to the eastern side of the building along the eastern perimeter of the Project sit (see **Page 5-95**). The EIR assesses the environmental effects of the alternative and finds that its impacts would be similar to the proposed Project (construction noise would differ from the proposed Project in location and duration, but still be significant). Alternative 6 would result in a reduction of proposed open space (displaced by the three-story addition) identified in Project Objective 3 as a key project element. Nevertheless, the EIR concludes that Alternative 6 would accomplish all of the project's basic objectives, because the remaining open space would still be sufficient to accommodate community health programs.

Environmentally Superior Alternative

CEQA requires the EIR to identify the environmentally superior alternative. If the environmentally superior alternative is the No Project Alternative, the EIR must also identify an environmentally superior alternative among the other alternatives. The EIR finds Alternative 4 to be the environmentally superior alternative, because it would substantially reduce the duration of the temporary but significant construction noise impact. Although Alternative 5 would also substantially reduce the duration of construction noise (by 4 to 6 months), the reduction achieved by Alternative 4 would be much greater (28 months).

SECTION 6.0, *LIST OF PREPARERS*

This section lists the persons responsible for preparing the EIR.

SECTION 7.0, *REFERENCES*

References cited in the EIR are listed by environmental topic.