5.0 ALTERNATIVES

5.1 INTRODUCTION

This section of the Environmental Impact Report (EIR) evaluates alternatives to the Phase 1 preliminary site development plan and Phase 2 development program under the proposed Beach Cities Health District (BCHD) Healthy Living Campus Master Plan (Project) and analyzes the comparative environmental impacts associated with each alternative.

The California Environmental Quality Act (CEQA) Guidelines state that an "*EIR shall describe a range of reasonable alternatives to the proposed project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives*" (CEQA Guidelines Section 15126.6[a]).

The CEQA Guidelines further state that "*the range of alternatives required in an EIR is governed by a 'rule of reason'*" that requires the EIR to set forth only those alternatives necessary to permit fully informed decision making. The alternatives shall be limited to ones that would avoid or substantially reduce any of the significant and unavoidable effects of the proposed Project. Of those alternatives, the EIR needs to examine in detail only the ones that the lead agency determines could feasibly attain most of the basic project objectives (CEQA Guidelines Section 15126.6[f]). The EIR must also identify alternatives that were considered by the lead agency, but rejected as infeasible during the scoping process (CEQA Guidelines Section 15126.6[c]).

Not every conceivable alternative must be addressed, nor do infeasible alternatives need to be considered (CEQA Guidelines Section 15126.6[a]). In defining the feasibility of alternatives, the CEQA Guidelines state that "*among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site*" (CEQA Guidelines Section 15126.6[f][1]). The CEQA Guidelines also require the analysis of a No Project Alternative (CEQA Guidelines Section 15126.6[e][1]). Based on the alternatives analyzed, the lead agency must identify an environmentally superior alternative (CEQA Guidelines Sections 15091, 15126.6[e][2]). The lead agency is not, however, obligated to select the Environmentally Superior Alternative for implementation if it would not accomplish the basic project objectives and/or is infeasible (CEQA Guidelines Section 15126.6[a], [c], and [f]).

The EIR should include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed Project. The alternatives analyzed in this EIR have been prepared at a sufficient level of detail to permit their consideration for adoption by the BCHD Board of Directors.

The alternatives analysis for this EIR is presented in the following four parts. Section 5.2, *Project Objectives* below describes the objectives of the proposed Project. Section 5.3, *Summary of Potentially Significant Impacts* summarizes the potentially significant impacts of the proposed Project from information presented in Section 3.0, *Environmental Impact Analysis and Mitigation Measures*. Section 5.4, *Alternatives Considered but Rejected from Further Analysis* identifies alternatives considered but rejected for further analysis. Section 5.0, *Alternatives Analysis* describes the alternatives selected for full evaluation, and discusses potential impacts under each of these alternatives. Section 5.6, *Identification of the Environmentally Superior Alternative* concludes with the identification of an environmentally superior alternative, which is the alternative that generates the fewest significant.

5.2 PROJECT OBJECTIVES

As discussed in Section 2.4, *Project Objectives*, BCHD developed three major *"Project Pillars,"* which were presented to the Board of Directors during a public meeting on June 17, 2020. The Project Objectives are based on these three Project Pillars:

Health

- Build a center of excellence focusing on wellness, prevention, and research.
- Leverage the campus to expand community health programs and services.

Livability

- Focus on emerging technologies, innovation, and accessibility.
- Create an intergenerational hub of well-being, using Blue Zones Project principles.

Community

- Actively engage the community and pursue partnerships.
- Grow a continuum of programs, services, and facilities to help older adults age in their community.

Based on these Project Pillars, BCHD developed six Project Objectives:

- Eliminate seismic safety and other hazards of the former South Bay Hospital Building (i.e., 514 North Prospect Avenue).
- 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.
- Provide sufficient public open space to accommodate programs that meet community health needs.
- Address the growing need for assisted living with on-site facilities designed to be integrated with the broader community through intergenerational programs and shared gathering spaces.
- Redevelop the Project site to create a modern campus with public open space and facilities designed to meet the future health needs of residents, including a Community Wellness Pavilion with meeting spaces for public gatherings and interactive education.
- Generate sufficient revenue through mission-derived services and facilities to address growing future community health needs.

5.3 SUMMARY OF POTENTIALLY SIGNIFICANT IMPACTS

The proposed Project would result in significant and unavoidable impacts associated with construction noise levels (refer to Section 3.11, *Noise*). In addition, the proposed Project would result in impacts that are either *less than significant* or *less than significant with mitigation*, which are related to areas of community concern that were identified during community meetings held between 2017 and 2020 as well as agency and public comment letters received on the Notice of Preparation (NOP) (see Appendix A). These areas of community concern include potential impacts to visual resources as a result of building height, construction-related air emissions, erosion during excavation and grading, existing soil contamination and hazardous materials, vehicular access, and transportation (refer to Section 3.1, *Aesthetics and Visual Resources*; Section 3.2, *Air Quality*; Section 3.6, *Geology and Soils*; Section 3.8, *Hazards and Hazardous Materials*; Section 3.10, *Land Use and Planning*; and 3.14, *Transportation*, respectively). While this EIR concludes that impacts to these environmental issue areas are not anticipated to be significant, these impacts, in addition to the significant and unavoidable construction-related noise impact, were used as screening criteria to determine appropriate alternatives that could avoid or substantially reduce the environmental impacts identified for the proposed Project (see Section 5.4, *Alternatives Considered but Discarded* and Section 5.5, *Alternatives Analysis*). Refer to Section 1.8, *Areas of Known Public Controversy* for a more detailed discussion environmental issues known to be of public concern.

Aesthetics and Visual Resources

As described further in Section 3.1, *Aesthetics and Visual Resources*, the existing Project site is developed with the Beach Cities Health Center and the attached maintenance building, two medical office buildings, a parking structure, and surface parking lots. The tallest building on-site is the Beach Cities Health Center, which is 5 stories tall with a rooftop projection (i.e., elevator shaft) reaching up to a height of 76 feet above the campus ground level. The proposed Residential Care for the Elderly (RCFE) Building included in the Phase 1 preliminary site development plan would have a maximum roof height of approximately 103 feet above the campus ground level and 133.5 feet above the vacant Flagler Lot below, including rooftop projections for permitted elements (e.g., elevator shafts, stairs, photovoltaic solar panels, etc.). While there are no designated scenic vistas or scenic view corridors in the vicinity of the Project site identified by the City of Redondo Beach or City of Torrance, the highpoint of 190th Street at Flagler Lane (i.e., Representative View 6) provides wide-ranging panoramic views of Redondo Beach to the south, including the ridgeline of the Palos Verdes hills. Under the proposed Project, the rooftop of the proposed 6-story RCFE Building would substantially interrupt the ridgeline of the Palos Verdes hills as seen from that public viewpoint. However, implementation of Mitigation Measure (MM) VIS-1 would reduce the height of the building such that it would no longer interrupt this ridgeline. With implementation of MM VIS-1, impacts to this important scenic vista would be *less than significant with mitigation*.

Air Quality

As described in Section 3.2, *Air Quality*, peak daily construction emissions during Phase 1 and Phase 2 would be well below South Coast Air Quality Management District (SCAQMD) thresholds, and therefore would be *less than significant*. However, on-site construction-related emissions would exceed the SCAQMD localized significance thresholds (LSTs) for respirable particulate matter (PM_{10}) and fine particulate matter ($PM_{2.5}$) as they affect off-site receptors. MM AQ-1 would require watering of exposed surfaces three times daily achieving a fugitive dust reduction of 74 percent and prohibiting demolition when wind speed is greater than 25 miles per hour (mph), which would achieve a fugitive dust reduction of 98 percent. Therefore, with implementation of MM AQ-1, impacts with regard to localized construction emissions would be *less than significant with mitigation*.

Similarly, construction activities associated with the proposed Project would generate diesel particulate matter (DPM). However, MM AQ-1 requires the use of U.S. Environmental Protection Agency (USEPA) Tier 4 engines on all construction equipment, except crushing equipment, which

would reduce DPM emissions from combustion by 79 to 94 percent. With the use of Tier 4 engines, DPM emissions anticipated during the construction of Phase 1 would not exceed SCAQMD thresholds for cancer risk, and impacts to sensitive receptors due to temporary, localized construction DPM emissions would be *less than significant with mitigation*.

Geology and Soils

Construction of the proposed Project would involve the excavation of approximately 20,000 cubic yards (cy) of soil during implementation of the Phase 1 preliminary site development plan and 11,000 cy of soil during construction associated with the Phase 2 development program. Additionally, grading would be required to backfill the basement associated with the Beach Cities Health Center and to level the other areas of the Project site. While construction activities would be temporary – lasting for a period of 29 months during Phase 1 and approximately 28 months during Phase 2 – excavation and grading associated with the proposed Project would result in exposed soil and the potential for erosion caused by wind and/or stormwater runoff. The proposed Project would be required to implement erosion control best management practices (BMPs) in accordance with a Stormwater Pollution Prevention Plan (SWPPP) in order to meet the requirements of the Construction General Permit. Additionally, BCHD would be required to prepare and implement Standard Urban Stormwater Mitigation Plan (SUSMP) to address soil erosion and urban runoff. With the implementation of BMPs in accordance with the SWPPP, and the SUSMP and low impact development (LID) requirements, potential impacts associated with erosion or the loss of topsoil would be *less than significant*.

Hazards and Hazardous Materials

Due to the age of the existing buildings on-site it is assumed that asbestos-containing material (ACM) and lead-based paint (LBP) are present in the buildings proposed for demolition under the Phase 1 preliminary site development plan and the Phase 2 development program (refer to Section 3.8, *Hazards and Hazardous Materials*). Additionally, the transformers and florescent light ballasts on-site may contain polychlorinated biphenyls (PCBs) and mold could also potentially be present. If not properly abated, the accidental release of ACM, LBP, PCBs, and/or mold could pose a hazard to the environment and public health. However, implementation of MM HAZ-1 and compliance with existing mandatory regulations and BMPs related to the treatment, handling, and disposal of ACM, LBP, PCBs, and mold, would ensure that impacts associated with the proposed Project would be *less than significant with mitigation*.

As previously described, construction of the proposed Project would involve the excavation of substantial amounts of soil and additional earthwork associated with trenching and grading. Soil

disturbance during excavation, trenching, and grading at the Project site would result in the disturbance of potentially contaminated soil (refer to Section 3.8, *Hazards and Hazardous Materials*). The implementation of MM HAZ-2a through -2d would ensure volatile organic compounds (VOCs) and contaminated soils are properly detected, removed, and handled during ground disturbing activities. Therefore, the risk of an accidental release of hazardous materials into the environment during construction of the proposed Project would be *less than significant with mitigation*.

Land Use

As described in Section 3.10, *Land Use and Planning*, the proposed one-way driveway and pick-up/drop-off zone exit onto Flagler Lane as well as the service area and loading dock entry/exit onto Flagler Lane may be potentially inconsistent with Torrance Municipal Code (TMC) Section 92.30.8, which prohibits site access to commercial or industrial properties from local streets when access from a major or secondary arterial road is available. The purpose of this policy is to avoid vehicle traffic from commercial or industrial uses through residential streets within Torrance. The proposed one-way and pick-up/drop-off zone exit would be limited to left-turn only onto northbound Flagler Lane and would prohibit vehicle traffic onto southbound Flagler Lane towards the Torrance neighborhood to the east of the Project site. Similarly, the proposed service area and loading dock entry/exit would provide right-turn in and left-turn out access to avoid cut-through traffic within the Torrance neighborhood. This service entrance would be limited to service vehicles and delivery vehicles only and would not be used by staff, residents, participants, or other visitors to the BCHD campus. Nevertheless, Flagler Lane, which is designated as a local street in the Torrance General Plan Circulation and Infrastructure Element. Since vehicular access to the Project site is available from North Prospect Avenue and Beryl Street, which are both identified as secondary arterial streets by the Redondo Beach General Plan Circulation Element (refer to Section 3.14, *Transportation*), the proposed access along Flagler Lane may be potentially inconsistent with TMC Section 92.30.8. (The applicability of this policy remains unclear given that Beryl Street is located within Redondo Beach and the vacant Flagler Lot has been zoned as C-2 [Commercial] by the City of Redondo Beach.) Nevertheless, as described in Section 3.2, *Air Quality*, Section 3.11, *Noise*, and Section 3.14, *Transportation* the development of this proposed driveway would not result in any significant environmental impacts with regarding to air emissions, roadway noise, or geometric roadway hazards. While development of the proposed access points the within the City of Torrance right-of-way may potentially conflict with TMC Section 92.30.8, it would not cause a significant environmental impact. Therefore, impacts related to land use and planning would be *less with significant*.

Cut-through traffic within residential neighborhoods and nearby schools was identified as a concern raised by the City of Torrance and the Torrance residents during the public scoping period. It should also be noted that the City of Torrance is considering the removal of the southbound traffic along Flagler Lane between Beryl Street and Towers Street, to address neighborhood concerns regarding existing cut-through traffic, particularly as it relates to pick-up and drop-off at Towers Elementary School. If approved by the City of Torrance, this change to the transportation network would prevent service vehicles from entering the proposed subterranean service area and loading dock under the proposed Project.

Noise

All phases of construction associated with the proposed Project would involve the use of heavy construction equipment (e.g., cranes, bulldozers, excavators, etc.). Additionally, demolition and excavation would include the use of haul trucks and construction of the structures would require the use of concrete trucks. Construction activities would produce increased noise levels that would impact surrounding noise-sensitive receptors. MM NOI-1 would require the implementation of noise attenuation measures, including the use of noise barriers (i.e., sound wall) on the BCHD campus to encompass the development footprint associated with Phase 1 and Phase 2 construction. Compliance with existing local noise regulations along with the implementation of MM NOI-1 would reduce potential noise impacts. However, given the maximum roof heights of the proposed RCFE Building (i.e., 103 feet above the campus ground level and 133.5 feet above the vacant Flagler Lot below) and other proposed building(s) under the Phase 2 development program (i.e., up to 71.5 feet above the campus ground level and 101.5 feet above the vacant Flagler Lot below), construction of noise barriers to a height necessary to break the line of sight from surrounding sensitive receptors would be infeasible. With implementation of a noise barrier, sensitive receptors would not be directly impacted by construction noise until development reached a height that exceeded the noise barrier. However, as development would exceed the noise barrier, noise levels would exceed the Federal Transit Administration's (FTA's) residential criterion (8-hour L_{eq} of 80 dBA or 30-day average L_{dn} of 75 dBA). Therefore, *significant and unavoidable* noise impacts would occur during portions of the proposed construction – including for the Phase 1 preliminary site development plan and the Phase 2 development program.

Transportation

Construction activities associated with Phase 1 of the proposed Project would generate up to approximately 1,825 haul truck trips for export of demolished asphalt and excavated soil, and 2,000 haul truck trips for export of demolition debris. Additionally, construction of the proposed

RCFE Building would require approximately 1,237 truck trips for concrete delivery. Backfill of the Beach Cities Health Center basement would require approximately 875 truck trips for import of clean soil (refer to Section 2.5.1.3, *Construction Activities*). Construction activities associated with the Phase 2 development program would require approximately 1,660 trips associated with export of demolition debris and excavated soil and approximately 2,149 trips associated with concrete and steel deliveries (refer to Section 2.5.2.4, *Construction Activities*). Construction-related haul truck trips and worker vehicle trips would result in additional trips per day on the surrounding street network – including Pacific Coast Highway and Interstate (I-) 405 – throughout the construction period, which would increase vehicle miles traveled (VMT), disrupt traffic flows, reduce lane capacities, and generally slow traffic movement. In addition, such traffic could interfere with or delay transit operations and disrupt bicycle and pedestrian mobility and safety. However, construction-related increases in traffic would be intermittent throughout the construction period associated with the Phase 1 preliminary site development plan and the Phase 2 development program, and would be temporary in nature. Haul trucks would exit the I-405 freeway on 190th Street or Hawthorne Avenue to 190th Street and reach the site using Del Amo Street to North Prospect Avenue to avoid residential streets to the maximum extent feasible. MM T-2 would reduce this impact by requiring preparation and implementation of a Construction Traffic and Access Management Plan, which would include provisional measures to reduce construction-related traffic and maintain public safety. With the implementation of MM T-2, construction-related transportation impacts would be reduced to *less than significant with mitigation*.

Implementation of Phase 1 is estimated to reduce existing trip generation by approximately 1,919 daily trips, 234 AM peak hour trips, and 158 PM peak hour trips. Therefore, Phase 1 of the proposed Project would reduce VMT. However, following the development of under Phase 2, the proposed Project would result in an increase in daily trip generation associated with the Aquatics Center and the relocation of the Center for Health and Fitness (CHF) back to the campus. The net trip generation from Phase 2 of the proposed Project is expected to be 376 additional daily trips, with 37 fewer AM peak hour trips and 28 fewer PM peak hour trips (refer to Table 3.14-7 in Section 3.14, *Transportation*). While the implementation of the Phase 2 development program is expected to generate an increase in daily trips and associated VMT, BCHD generates a shorter average trip length than typical uses in the South Bay Cities Council of Governments (SBCCOG) subregion by nature of its service area. As described in Table 3.14-11, the Southern California Association of Governments (SCAG) Regional Travel Demand model determined that home-based work VMT generated within the Project Transportation Analysis Zone (TAZ) does not exceed the threshold of 16.8 percent below the regional average, and impacts related to home-

based work VMT under the proposed Project are considered to be *less than significant*. However, the TAZ home-based VMT per capita would exceed the threshold of 16.8 percent below the regional average. Therefore, based on the SCAG model, implementation of proposed Project could result in a potentially significant impact associated with home-based VMT. However, the proposed Assisted Living units would generate vehicle trips and VMT at a lower level than typical residential uses contained in the SCAG model forecast as explained under Impact T-2 in Section 3.14, *Transportation*. Further, the proposed Project would implement several transportation-related sustainability features that are not accounted for in the SCAG Regional Travel Demand model estimation of home-based VMT (e.g., shared vans for the Assisted Living, Memory Care, and Program of All-Inclusive Care for the Elderly [PACE] service to transport several participants at once, bicycle sharing program, etc.). Therefore, impacts with regard to Project-related operational VMT would be *less than significant* (refer to Section 3.14, *Transportation*). While the proposed Project would not generate VMT that would result in a significant transportation impact, MM T-1 is recommended to provide additional information regarding the proposed Transportation Demand Management (TDM) plan consistent with the requirements of RBMC Section 10-2.2406. Implementation of the TDM plan would further reduce VMT associated with the proposed Project.

5.4 ALTERNATIVES CONSIDERED BUT REJECTED FROM FURTHER ANALYSIS

As previously described, CEQA Guidelines Section 15126.6(c) requires that an EIR disclose alternatives that were considered and rejected for further analysis, and provide a brief explanation as to why such alternatives were eliminated from detailed consideration. As required by the CEQA Guidelines, the selection of alternatives for the proposed Project included a screening process to determine which alternatives could avoid or substantially reduce the environmental impacts associated with the proposed Project while also feasibly meeting the Project Objectives. The following alternatives were considered but eliminated from further analysis due to infeasibility or inconsistency with Project Objectives.

Upgrade the Beach Cities Health Center (No Seismic Retrofit)

This alternative would involve interior renovation of the Beach Cities Health Center, including demolition of interior walls, upgrades to existing electrical and plumbing systems, and reconfiguration of interior space to better accommodate potential tenants. This alternative would not include retrofits to address seismic-related structural deficiencies and potential public safety hazards due to the infeasible financial cost of such retrofits. However, the interior renovation of the Beach Cities Health Center would address other existing maintenance issues (e.g., outdated electrical and plumbing systems) and would provide space configurations that would be better

suited for potential tenants. Upgrade of the Beach Cities Health Center would require BCHD to end existing leases with the current tenants in order to allow the time and space necessary to complete the renovations. The financial investment required to renovate the Beach Cities Health Center, along with the long-term or permanent end to existing leases, would be financially infeasible for BCHD. Therefore, this alternative would require a substantial reduction in the level of existing community health and wellness programs and services provided by BCHD. Upgrade of the Beach Cities Health Center would not meet any of the Project Objectives, including eliminating seismic safety hazards of the Beach Cities Health Center or providing public open space to accommodate community health programs.

Development on Alternate Site

Alternate sites for the relocation of existing BCHD uses and the development of proposed services and facilities were considered. Such sites would need to be located within Redondo Beach, Hermosa Beach, or Manhattan Beach and have similar attributes to the Project site. For example, an alternative site would need to be large enough (i.e., 9.78 acres or greater) to accommodate the development footprint and uses associated with the proposed Healthy Living Campus. Additionally, the alternative site would need to be designated P (Public or Institutional) land use and zoned Community Facility (P-CF), or the Hermosa Beach or Manhattan Beach equivalent of this land use designation, to support the uses associated proposed Health Living Campus Master Plan. Very few sites within the Beach Cities are large enough to accommodate these uses, and those that do are currently occupied by other essential facilities, such as public school and public works facilities.

1100 North Harbor Drive, Redondo Beach is currently occupied by AES Redondo Beach LLC, which plans to continue operation of the site as a natural gas-fired power plant through 2021. Although AES Redondo Beach LLC finalized the sale of the site to a private developer in March 2020, the new owner of the site is currently considering future redevelopment options with the City of Redondo Beach and California Coastal Commission. The site is large enough (approximately 51 acres) to support the uses associated with the proposed BCHD Healthy Living Campus Master Plan. The site is also located along Beach Cities Transit Line 102, and in close

proximity to bicycle and pedestrian facilities as well as the Redondo Beach Pier, which is a major commercial center. However, the site is zoned as P-GP (Generating Plant), which would allow for recreational facilities but would not permit hospitals, medical offices and health-related facilities, or residential care facilities. The site could also present additional constraints related to soil contamination from previous operations. All other Public or Institutional sites within the City of Redondo Beach are developed with public schools, public parks, or plant nurseries. BCHD could apply for a zoning change; pursuant to Measure DD, which was approved in 2008, any such zoning changes would require a public vote.

The property at 1100 North Harbor Drive, which supports the AES Redondo Beach Power Plant, was initially considered as an alternative site for the proposed BCHD Healthy Living Campus, but was removed from consideration due to the incompatible zoning (P-GP) at the site.

Alternative sites within Hermosa Beach would require a PF (Public Facility) land use designation to support the uses associated with the proposed BCHD Healthy Living Campus Master Plan. Existing properties designated PF within Hermosa Beach are developed with public schools (e.g., Hermosa Valley School, Hermosa View Elementary School), public parks (e.g., Valley Park), public service facilities (e.g., Hermosa Beach City Hall, Hermosa Beach Police Department, Los Angeles County Fire Department Station 100), community facilities (e.g., Hermosa Beach Community Center, Hermosa Beach Historical Society, Hermosa Beach Farmers Market) or public parking that provides coastal access. There are no undeveloped or underdeveloped sites designated as PF within Hermosa Beach, which are also large enough to support the uses associated with the proposed BCHD Healthy Living Campus Master Plan.

Similarly, a majority of the properties designated Public Facilities within Manhattan Beach are developed with public schools (e.g., Mira Costa High School, Meadows Elementary School, Manhattan Beach Middle School), public service facilities (e.g., Manhattan Beach City Hall, Manhattan Beach Police Department, Manhattan Beach Fire Department Station 1, Manhattan Beach Library), community facilities (e.g., Joslyn Community Center) and public parking. One Public Facilities site, which includes the properties at 3621 Bell Avenue and 3601 Bell Avenue,

Development of the proposed Healthy Living Campus at 3621 Bell Avenue and 3601 Bell Avenue in Manhattan Beach could be constrained by hazardous materials contamination from existing operations at the National Guard Armory.

comprises a large site (approximately 11 acres) within northern Manhattan Beach. These properties are currently developed with the Manhattan Beach Public Works Yard and National Guard Armory, respectively, and are not currently available for purchase. Another site south of Sand Dune Park and north of Grandview Elementary School is an undeveloped Public Facilities site within Manhattan Beach. However, this site comprises less than 3 acres and therefore, is not large enough to support the uses associated with the proposed BCHD Healthy Living Campus Master Plan.

Development at alternate sites within the Beach Cities may also be constrained (e.g., presence of historic resources, contamination with hazardous materials, etc.) in ways that would result in a similar or greater level environmental impacts as the proposed Project, including impacts related to aesthetics, criteria pollutant and greenhouse gas (GHG) emissions, geology and soils, hazardous materials, noise, and transportation. Additionally, none of the potential alternate sites within the Beach Cities are under ownership or management of BCHD, and it would be economically infeasible for BCHD to purchase a new site for the proposed development. Therefore, alternative locations in the Beach Cities were determined not to be feasible for development of the proposed BCHD Healthy Living Campus Master Plan.

Development of Hospital, Medical Office, or Assisted Living

Under this alternative, BCHD would demolish the existing Beach Cities Health Center to proactively address seismic-related structural deficiencies and potential public safety hazards. Following demolition of the Beach Cities Health Center, BCHD would redevelop the existing campus to support one of the following alternative uses: a new hospital, purpose-built medical offices, or assisted living units. Each of these alternative uses would involve construction activities, including demolition, grading, soil hauling, materials delivery, and development of new facilities. Additionally, given the trip-making characteristics of these uses, some alternative uses may result in an increase in operational impacts (e.g., an increase in daily trips and VMT). Development of any one of these alternative uses would allow for smaller building space and

reduced building heights as compared to the buildings included as part of the proposed Project (i.e., 6-story RCFE building in Phase 1 and Phase 2 parking structure with up to 8.5 above ground levels). Therefore, all of the alternate uses considered for the BCHD campus would result in less severe impacts to public views than those described under Phase 1 and Phase 2 of the proposed Project.

- **Hospital.** The Beach Cities Health Center was originally constructed in 1958 as the publicly owned South Bay Hospital, providing hospital beds, surgery rooms, and emergency operating areas. However, in 1998 the South Bay Hospital closed due to competition with nearby privately owned hospitals, such as Torrance Memorial Medical Center and Little Company of Mary. These hospitals continue to exist today (Little Company of Mary is now Providence Little Company of Mary Medical Center) as well as others (e.g., Providence Medical Institute in Redondo Beach and Torrance Memorial Urgent Care in Manhattan Beach). The existing hospitals in the region continue to meet the existing demand; therefore, there is currently no long-term need or demand for an additional hospital serving the Beach Cities.
- **Medical Office Building.** The BCHD campus currently provides dedicated medical office space within the Beach Cities Health Center, Beach Cities Advanced Imaging Building, and Providence Little Company of Mary Medical Institute Building. Leasing such spaces to tenants is a major source of BCHD revenues that in turn support existing BCHD programs and services. This alternative would include demolition of the existing Beach Cities Health Center and replacement with one or several medical office buildings. These offices would generate additional revenue for BCHD, which would be potentially sufficient funding to replace revenue that would be lost from discontinued leases within the Beach Cities Health Center. However, there is increased competition from purpose-built medical office space provided elsewhere, notably in close proximity to active hospitals in the region. As such, provision of additional medical office space may not be economically viable. Further, medical offices are one of the primary vehicle trip generators on the existing BCHD campus. Redevelopment of the campus with new purpose-built medical office space would result in potentially significant transportation-related impacts to the surrounding roadway network. Under this alternative, existing programs and services located within the Beach Cities Health Center would not be relocated or reconstructed on-site. Discontinuation of these programs and services would not support BCHD's mission of enhancing community health and wellbeing for all residents of Beach Cities and nearby South Bay communities. This alternative would not support project objectives relating to

enhancing public open space, addressing the growing need for community integrated assisted living facilities, and providing for the future health needs of the community.

- **Assisted Living.** Redeveloping the BCHD campus to support additional Assisted Living units was also considered. An Assisted Living and Memory Care Market Feasibility Study was prepared in 2019 in support of the proposed Project (MDS Research Company, Inc. 2019). The Market Feasibility Study assessed the practicality of relocating 60 Silverado Memory Care units and developing 157 new Assisted Living units based on senior demographics in the local areas, population of income qualifying households in the primary market area, and occupancy rates of competitor senior residential housing options. These options include independent living communities (i.e., Brookdale South Bay, Seasons Senior Apartments, etc.), stand-alone assisted living / residential care communities (i.e., Canterbury Retirement Community, Palos Verdes Villa, etc.), and Alzheimer's / memory care facilities (i.e., Well Brook Senior Living, Sunrise of Hermosa Beach, etc.) The study also took into consideration future planned senior residential housing options (i.e., Kensington, which began operation in the Summer of 2019). Given the existing competitor senior housing options in the area and given the current and projected senior demographic populations in the Redondo Beach area, the study concluded there is sufficient size and depth of the qualified target market to introduce 157 new Assisted Living units. Under this alternative, the Project site would be redeveloped with a greater number of Assisted Living units that surpasses the quantity assessed in the market feasibility study. This alternative may not be economically viable due to existing and planned competitor senior residential housing options in the vicinity. Further, this alternative would not include the Youth Wellness Center, Aquatics Center, CHF, Blue Zone café with a Demonstration Kitchen, or associated programs, reducing BCHD's capacity to meet its mission of enhancing community health through partnerships, programs, and services for all residents of Beach Cities and nearby cities. Without these programs and services, Project Objectives to provide intergenerational programs, shared gathering spaces, and facilities integrated with the broader community, as well as to meet future community health needs, would not be met.

5.5 ALTERNATIVES ANALYSIS

This section discusses alternatives to the proposed Project that were carried forward for detailed analysis, including the No Project Alternative, pursuant to CEQA Guidelines Section 15126.6(e). Each of these considers the ability of a particular alternative to substantially reduce or eliminate one or more of the significant environmental impacts associated with the proposed Project (refer

to Section 5.3, *Summary of Potentially Significant Impacts*), while still meeting most of the basic Project Objectives. These alternatives include:

- 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

5.5.1 Alternative 1 – No Project Alternative (Demolish and Replace with Limited Open Space)

Pursuant to CEQA Guidelines Section 15126.6(e)(2), the No Project Alternative analysis shall discuss the existing conditions at the time the NOP is published. The No Project Alternative is compared to the impacts described for the proposed Project, which in this case includes the Phase 1 preliminary site development plan and the more general Phase 2 development program, collectively intended to address building maintenance issues, seismic safety, and better support public health programs and services provided by BCHD. Under the No Project Alternative, the proposed BCHD Healthy Living Campus Master Plan would not be implemented and the existing BCHD campus would not be redeveloped. Additionally, BCHD would continue to lease the vacant Flagler Lot as a construction staging area and a source of operational revenue.

The No Project Alternative assumes that the existing facilities on the BCHD campus – including the Beach Cities Health Center (514 North Prospect Avenue), Beach Cities Advanced Imaging Building (510 North Prospect Avenue), and the Providence Little Company of Mary Medical Institute Building (520 North Prospect Avenue) – would continue to be used to provide for BCHD programs and services as well as tenant operations. This would include the continued operation of Community Services, CHF, Beach Cities Silverado Memory Care Community, and other tenant operations (e.g., outpatient medical office) in the Beach Cities Health Center. Additionally, tenant operations (e.g., outpatient medical office) would continue in the Beach Cities Advanced Imaging Building and the Providence Little Company of Mary Medical Institute Building. BCHD would continue to provide building maintenance as required. However, as described Section 1.6, *Project Background*, escalating maintenance costs are beginning to outpace the revenue generated by tenants that are currently leasing space in these buildings. Within the near future (i.e., approximately 2 to 3 years), BCHD would be required to make financial decisions regarding the termination of tenant leases as well as relocation and substantial reductions in BCHD program

offerings. For example, the existing CHF would be permanently relocated off-site and would remain operational; however, community health and wellness programs and services provided to the Beach Cities would be substantially reduced. In addition to addressing on-going building maintenance, BCHD would continue to monitor the structural stability of the Beach Cities Health Center and the Beach Cities Advanced Imaging Building.

Local Bond Measure and Seismic Retrofit

Under the No Project Alternative, BCHD would first attempt to place a local bond measure on the ballot to fund seismic retrofits, which would include the addition of new exterior steel braced frames, new or strengthened concrete walls, and the addition of steel reinforcing bars to the concrete columns. (The seismic retrofit of the Beach Cities Health Center and Beach Cities Advanced Imaging Building would require temporary, but prolonged closure of existing uses during construction. BCHD would not renew, or would be required to terminate, existing leases, which would eliminate a significant source of funding, thereby requiring the local bond measure.) If successful, BCHD would implement the seismic retrofit, which would be exempt from CEQA (e.g., CEQA Guidelines Section 15302[a]). Following the completion of the seismic retrofit, BCHD would once again lease building space to fund community health and wellness programs and services, similar to existing conditions. However, the success of a local bond measure is speculative, particularly given the history of recent bond measure initiatives in the South Bay. For example, despite having relatively low school taxes, Hermosa Beach voters rejected local bond measures in 2008, 2010, and 2014, the latter of which was a $54 million bond that would have increased property taxes by $29.50 per $100,000 in assessed valuation. A $59 million bond was eventually passed in 2016 with 59 percent of the vote. BCHD would not be able to continue to provide community health and wellness programs and services over a period of multiple election cycles with multiple campaigns at securing bond funding.

Demolition and Creation of Limited Open Space

If a local bond measure cannot be placed on the ballot, or if the local bond measure is otherwise unsuccessful, BCHD would eventually address the seismic safety hazards by demolishing the existing Beach Cities Health Center using existing funding reserves, and would create open space with landscaped turf and limited hardscape, but generally lacking programmable space or public amenities, as described further below.

Demolition of the Beach Cities Health Center would occur as described for the Phase 1 preliminary site development plan (refer to Section 2.5.1.6, *Construction Activities*). Following the vacation of the building, demolition of the Beach Cities Health Center would occur over a 1-month period.

Demolition activities would generate approximately 32,000 cy of demolition debris – including structural steel, wood, glass, flooring, and utility material such as pipes and cables – which would be exported from the Project site in approximately 2,000 haul truck trips. Following the completion of demolition activities, the existing basement would be filled with approximately 14,000 cy of soil imported to the Project site in 875 truck trips over a period of 1 month.

Demolition would require the use of standard construction equipment, including an excavator, bulldozers, backhoes, and excavators to break up and remove existing asphalt, concrete, and building materials. A high-reach excavator would be used along with a variety of attachments (e.g., shears, crushers, and hydraulic hammers) to dismantle the structure to avoid flying debris and minimize dust and noise. Haul trucks would be used to export large amounts of debris to a mixed construction and demolition (C&D) debris recycling facility approved by the City of Redondo Beach pursuant to a Construction & Demolition Waste Management Plan. Where needed, any existing hazardous materials found during the demolished buildings (i.e., ACM, LBP, PCBs) or soil vapor contamination (i.e., tetrachloroethylene [PCE]) would be properly handled and disposed of in accordance with regulatory requirements.

When necessary, the existing Beach Cities Advanced Imaging Building would also be demolished following the end of existing tenant leases. The demolition of the Beach Cities Advanced Imaging Building would occur over a 3-month period and would involve the export of 8,550 cy of demolition debris. Demolition debris would be exported off-site in 972 haul truck trips.

Following the completion of demolition activities, the footprint of the existing buildings would be graded and redeveloped with landscaped turf and limited hardscaping. Given the funding limitations associated with the No Project Alternative and the need for BCHD to minimize costs associated with future maintenance activities, no restrooms or other park-like facilities (e.g., slides, recreational fields, etc.) would be constructed under the No Project Alternative and this area of the Project site would be used as a passive open space. (However, given the zoning designation of P-CF, it is unclear whether Redondo Beach would seek to require such facilities as a part of Planning Commission Design Review.) BCHD would fund limited long-term operational maintenance activities necessary for the landscaped turf and would use this area for community health and wellness services and programs (e.g., fitness classes, etc.) and other outdoor events, as feasible. However, given that the open space would not be surrounded by complementary uses (e.g., Assisted Living, Aquatics Center, CHF, etc.), its utility for these purposes would be much more limited than the open space described for the proposed Project. Additionally, with the reduction in revenue associated with the No Project Alternative, the capacity of BCHD to provide community health and wellness programs and services would be substantially reduced.

The medical offices in the Providence Little Company of Mary Medical Institute Building would remain along with the existing surface parking lots and the ground parking structure at 512 North Prospect Avenue.

The impacts associate with the No Project Alternative are described below and are presented in comparison with the impacts associated with the proposed Project, which are described in detail in Section 3.0, *Environmental Impact Analysis and Mitigation Measures*.

Aesthetics and Visual Resources

Implementation of the No Project Alternative would result in the continued use of the Beach Cities Health Center, Beach Cities Advanced Imaging Building, and Providence Little Company of Mary Medical Institute Building until building maintenance becomes financially infeasible over the next 2 to 3 years. At this point, BCHD would not renew or would terminate its leases with existing tenants and would begin demolition of the Beach Cities Health Center and potentially the Beach Cities Advanced Imaging Building, as needed.

Following the completion of demolition activities, the existing development of the BCHD campus would be substantially reduced in terms of its existing density. The central area of the campus (i.e., the existing footprint of the Beach Cities Health Center) would be flat and would allow for views across the Project site from North Prospect Avenue (e.g., Representative View 5). Similarly, the footprint of the Beach Cities Advanced Imaging Building would also be flat; however, views across this area of the Project site from Flagler Lane and Flagler Alley (e.g., Representative View 2) would remain limited due to the existing topography. Following the completion of demolition activities, the remaining facilities would include the Providence Little Company of Mary Medical Institute Building as well as the parking structure at 512 North Prospect Avenue. The existing surface parking lots and subterranean parking garage would also remain. These remaining facilities at the BCHD campus would be relatively inconsistent with one another visually and would not form a campus-type environment. Additionally, the vacant Flagler Lot would remain undeveloped and would continue to be leased as a staging area for nearby construction projects. Therefore, existing views of this area from Beryl Street and Flagler Lane would continue to be characterized by exposed gravel and dirt and construction staging equipment.

Air Quality

Construction activities associated with the No Project Alternative would be limited to ongoing interior maintenance activities, until the demolition of the Beach Cities Health Center and potentially the Beach Cities Advanced Imaging Building. However, with the exception of

demolition, limited grading, and installation of landscaped turf and limited hardscaping, no additional construction activities would be required. Therefore, criteria air pollutant emissions associated with this alternative would be substantially reduced as compared to the proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program.

Following the demolition of the Beach Cities Health Center and the Beach Cities Advanced Imaging Building stationary source emissions (e.g., heating, ventilation, and air conditioning [HVAC]) from these buildings would be eliminated. Additionally, the daily vehicle trips associated with these buildings would also be eliminated. Stationary source emissions at the Project site would be limited to those from the Providence Little Company of Mary Medical Institute Building, and mobile source emissions would be limited to operational vehicle trips associated with the medical office building and landscaped open space. Therefore, operational emissions associated with the BCHD campus would be substantially reduced as compared to the proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program.

Biological Resources

Implementation of the No Project Alternative would involve the removal of landscaping adjacent to the Beach Cities Health Center and potentially the Beach Cities Advanced Imaging Building during demolition. However, the No Project Alternative would not require the removal of any of the landscaped trees along the eastern boundary of the Project site. Therefore, there would be a minor reduction in the potential for disturbance of nesting birds and other urban wildlife as compared to the proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program.

Cultural Resources and Tribal Cultural Resource

Under the No Project Alternative, construction activities would be limited to ongoing interior maintenance activities, until the demolition of the Beach Cities Health Center and potentially the Beach Cities Advanced Imaging Building. However, with the exception of limited grading and installation of turf landscaping and limited hardscaping, no additional ground disturbance would be required. Therefore, the potential for disturbance or other impacts to unknown buried cultural resources or tribal cultural resources would be substantially reduced as compared to the proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program.

Energy

The existing electricity, natural gas, and transportation energy demand associated with the BCHD campus would continue as described in Section 3.5.1, *Environmental Setting* until the leases with tenants are not renewed or are terminated within the next 2 to 3 years. However, with the exception of demolition, limited grading, and installation of turf landscaping and hardscaping, no additional construction activities would be required. As such, construction-related energy use would be temporary and negligible over the long-term.

Following the demolition of the Beach Cities Health Center and potentially the Beach Cities Advanced Imaging Building, electricity, natural gas, and transportation energy demand from these buildings would be eliminated. Energy demand associated with the BCHD campus would be limited to the Providence Little Company of Mary Medical Institute Building. As described in Section 3.5.1, *Existing Setting*, the existing annual electricity demand of the Beach Cities Health Center alone is approximately 2,378,070 kilowatt-hours (kWh) and the existing annual natural gas demand of the Beach Cities Health Center is approximately 22,532 therms. Therefore, implementation of the No Project Alternative would substantially reduce the operational energy demand associated with the BCHD campus compared to existing conditions.

Geology and Soils

With the exception of demolition, limited grading, and installation of turf landscaping and limited hardscaping, the No Project Alternative would not involve additional ground disturbing activities such as excavation or trenching. Therefore, the potential for soil erosion associated with this alternative would be substantially reduced as compared to the proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program.

Following the demolition of the Beach Cities Health Center and potentially the Beach Cities Advanced Imaging Building, the central area of the campus (i.e., the existing footprint of the Beach Cities Health Center) would be landscaped with turf and there would be no exposed soils on the BCHD campus. However, the vacant Flagler Lot would remain undeveloped and would be characterized by exposed gravel and dirt with moderate slopes. Therefore, the potential for soil erosion at the vacant Flagler Lot would remain.

Greenhouse Gas Emissions and Climate Change

Construction activities associated with the No Project Alternative would be limited to ongoing interior maintenance activities, until the demolition of the Beach Cities Health Center and potentially the Beach Cities Advanced Imaging Building. However, with the exception of

demolition, limited grading, and installation of turf landscaping and limited hardscaping, no additional construction activities would be required. Therefore, GHG emissions associated with construction under this alternative would be substantially reduced as compared to the proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program.

Operationally, the GHG emissions associated with the BCHD campus would remain the demolition of the Beach Cities Health Center and potentially the Beach Cities Advanced Imaging Building. Following the demolition of these buildings, GHG emissions from area, energy, waste, and water from these buildings would be eliminated. Additionally, the vehicle trips associated with these facilities would also be eliminated. Mobile source GHG emissions for this alternative would be limited to those operational vehicle trips associated with the Providence Little Company of Mary Medical Institute Building and limited open space turf landscaping. Therefore, operational emissions associated with the BCHD campus would be substantially reduced compared to the proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program. Implementation of the No Project Alternative would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs; however, the No Project Alternative would not include the sustainable design features described for the proposed Project, such as photovoltaic solar panels, solar hot water systems, and energy efficient HVAC systems, intended to reduce overall GHG impacts.

Hazards and Hazardous Materials

As previously described, the No Project Alternative would require the demolition of the Beach Cities Health Center in the next 2 to 3 years. Eventually, the demolition of the Beach Cities Advanced Imaging Building may also be required due to seismic-related safety issues. As described in Section 3.8, *Hazards and Hazardous Materials*, ACM, LBP, PCBs, and mold could potentially occur within the Beach Cities Health Center and other buildings on-site. Therefore, construction workers, employees, and visitors, and other members of the public could be exposed to these hazardous materials during demolition as well as hauling of demolition debris from Project site. Similar to the proposed Project, a comprehensive survey of ACM, LBP, PCBs, and mold would be conducted prior to and during the demolition activities and all demolition and hauling would occur in compliance with existing mandatory regulations and BMPs related to the treatment, handling, and disposal of ACM, LBP, PCBs and mold.

With the exception of demolition, limited grading, and installation of turf landscaping and limited hardscaping, no additional ground disturbing activities would be required. Therefore, the potential

for impacts related to exposure of existing soil contaminants (i.e., PCE, benzene, and chloroform) would be substantially reduced compared to the proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program. Given the reduced scope and duration of construction activities, impacts associated with the temporary use of petroleum, oils, and lubricants for heavy construction equipment would also be substantially reduced. However, since no excavation or trenching would occur under the No Project Alternative, the existing concentrations of PCE, benzene, and chloroform beneath the Project site would not be removed and would remain as described in Section 3.8.1, *Environmental Setting*.

Hydrology and Water Quality

As previously described, the No Project Alternative would require the demolition of the Beach Cities Health Center in the next 2 to 3 years. Eventually, the demolition of the Beach Cities Advanced Imaging Building may also be required due to seismic-related safety issues. With the exception of demolition activities, minor grading, and installation of turf landscaping, no other ground disturbing construction activities (e.g., excavation, utilities trenching, etc.) would be required. Similar to the proposed Project, all stormwater generated during construction would continue to be directed to the existing storm drain system and all elements of this alternative would be required to comply with the Construction General Permit (SWRCB Order No. 2009-0006-Data Quality Assessment). Implementation of BMPs developed in accordance with the requirements of the Construction General Permit would prevent violation of water quality standards and minimize the potential for contributing polluted runoff. Therefore, construction-related impacts to water quality standards, waste discharge requirements, and the municipal storm drain system would be reduced compared to the proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program.

Following demolition of the Beach Cities Health Center and potentially the Beach Cities Advanced Imaging Building, the No Project Alternative would redevelop the Project site with turf landscaping within the general footprint of these buildings. The existing surface parking lots on-site would remain. While installation of the turf landscaping would increase pervious area on-site as compared to existing conditions, the No Project Alternative would result in a smaller area of pervious surfaces as compared to the proposed Project. Additionally, the No Project Alternative would not involve construction of an infiltration system on-site, which would reduce runoff from the Project site as described for the proposed Project (refer to Section 3.9, *Hydrology and Water Quality*). Therefore, this alternative would not provide the same level of beneficial impacts as described for the proposed Project.

Land Use and Planning

BCHD would not renew, or would terminate, its leases with existing tenants and would begin demolition of the Beach Cities Health Center and potentially the Beach Cities Advanced Imaging Building, as needed. Following the completion of demolition activities, the existing footprints of the Beach Cities Health Center and Beach Cities Advanced Imaging Building would be landscaped with turf. Implementation of the No Project Alternative would not conflict with applicable land use plans, policies, and regulations, including SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS; Connect SoCal), Los Angeles County Metropolitan Transportation Authority's (Metro's) 2020 Long Range Transportation Plan (LRTP), South Bay Bicycle Master Plan, Redondo Beach and Torrance General Plans, and municipal code development standards.

Noise

Construction activities associated with the No Project Alternative would be limited to ongoing interior maintenance activities, until the demolition of the Beach Cities Health Center in the next 2 to 3 years. Eventually, the demolition of the Beach Cities Advanced Imaging Building may also be required due to seismic-related safety issues. However, with the exception of demolition, limited grading, and installation of turf landscaping and limited hardscaping, no additional construction activities would be required. Therefore, construction noise associated with this alternative would be substantially reduced as compared to the proposed Project – including the Phase 1 preliminary site development plan and the Phase 2 development program.

Following the demolition of the Beach Cities Health Center and the Beach Cities Advanced Imaging Building, stationary source noise from these buildings would be eliminated. The vehicle trips associated with these facilities would also be eliminated. Therefore, operational noise at the Project site would be limited to parking lot and vehicle noise associated with vehicle trips to the Providence Little Company of Mary Medical Institute Building and open space landscaped turf area. Therefore, operational noise associated with the BCHD campus would be substantially reduced as compared to the proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program.

Population and Housing

As previously described, implementation of the No Project Alternative would require the demolition of the Beach Cities Health Center within the next 2 to 3 years. Eventually, the demolition of the Beach Cities Advanced Imaging Building may also be required due to seismic-

related safety issues. At this point, the population associated with these buildings would be eliminated and the total population at the BCHD campus would be limited to employees and medical patients at the Providence Little Company of Mary Medical Institute Building. Similar to the proposed Project, demolition activities and the installation of turf landscaping would generate a minor and temporary increase in employment; however, given the limited scope and duration of the demolition and landscaping activities under this alternative, the number of construction workers required would be reduced as compared to the proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program. Following the demolition of the Beach Cities Health Center and potentially the Beach Cities Advanced Imaging Building, the No Project Alternative would not generate any new employment or population growth. Therefore, the No Project Alternative would result in a net reduction in population and employment as compared to existing conditions and would displace 60 Memory Care units (120 beds).

Public Services

The No Project Alternative would result in a long-term net reduction in population and employment as compared to existing conditions due to the eventual vacation and demolition of the Beach Cities Health Center and potentially the Beach Cities Advanced Imaging Building. As a result, implementation of the No Project Alternative would incrementally decrease the demand for fire protection emergency medical services (EMS) provided by Redondo Beach Fire Department (RBFD) and as well as police protection services provided by the Redondo Beach Police Department (RBPD). Similar to the proposed Project, the No Project Alternative would not result in an increase enrollment within the Redondo Beach Union School District or the Torrance Union School District and would not result in an increased need for library services, resources, and facilities. Therefore, this alternative would have no potential to impact public schools, parks and recreational facilities, or libraries. Additionally, the development of publicly accessible passive open space would result in a beneficial impact to recreational facilities; however, unlike the proposed Project, this alternative would not provide active open space to accommodate programs that meet community health and wellness needs.

Transportation

Construction activities associated with the No Project Alternative would be limited to ongoing interior maintenance activities, until the demolition of the Beach Cities Health Center in the next 2 to 3 years. Eventually, the demolition of the Beach Cities Advanced Imaging Building may also be required due to seismic-related safety issues. However, with the exception of demolition,

limited grading, and installation of turf landscaping and hardscaping, no additional construction activities would be required. Accordingly, construction-related haul truck trips would be limited to export of demolition debris associated with the Beach Cities Health Center and potentially the Beach Cities Advanced Imaging Building, import of clean backfill soil, and import of concrete for the hardscape improvements. Construction-related haul truck trips would be reduced from 9,544 total trips associated with Phase 1 and Phase 2 of the proposed Project (refer to Section 2.5.1.6, *Construction Activities* and Section 2.5.2.4, *Construction Activities*) to approximately 3,409 truck trips under the No Project Alternative (see Table 5.5-1).

Table 5.5-1. Estimated Number of Haul Truck Trips Under the No Project Alternative

	Number of Haul Truck Trips
Export	
Beach Cities Health Center Demolition Debris	2,000
Beach Cities Advanced Imaging Building Demolition Debris	534
Import	
Soil for Backfill of Beach Cities Health Center Basement	875
Total Number of Trips	**3,409**

Notes: The number of trips calculated for the export of demolition debris from the Beach Cities Advanced Imaging Building was calculated by applying the proportion of demolition debris from the Beach Cities Advanced Imaging Building to the total number of truck trips for export of demolition debris for both the Beach Cities Advanced Imaging Building and above ground parking garage. Export of demolition debris from the Beach Cities Advanced Imaging Building would constitute approximately 55 percent of the 972 total trips estimated for export of both the Beach Cities Advanced Imaging Building and above ground parking garage.

As previously described, the No Project Alternative would result in a long-term net reduction in population and employment as compared to existing conditions due to the eventual vacation and demolition of the Beach Cities Health Center and potentially the Beach Cities Advanced Imaging Building. Following demolition of the Beach Cities Health Center and the Beach Cities Advanced Imaging Building, operational vehicle trips associated with these buildings would be eliminated. Operational vehicle trips to the Project site would be limited to those associated with the Providence Little Company of Mary Medical Institute Building and passive open space on-site. Therefore, the No Project Alternative would substantially reduce the number of operational vehicle trips and associated VMT as compared to the proposed Project.

The No Project Alternative would result in no conflicts with transportation plans, policies, or regulations, no transportation design hazards, and no effects on emergency access to the Project site.

Utilities and Service Systems

Implementation of the No Project Alternative would require the demolition of the Beach Cities Health Center in the next 2 to 3 years. Eventually, the demolition of the Beach Cities Advanced Imaging Building may also be required due to seismic-related safety issues. At that point, BCHD would not renew, or would terminate, its leases with existing tenants and would begin demolition of the facilities, as needed. Construction-related impacts associated with the No Project Alternative would include temporary water use for dust control, equipment cleaning, and re-compaction and grading activities and disposal of demolition debris. Temporary impacts related to construction would occur for a period of at least 1 month during the demolition of the Beach Cities Health Center and at least 3 months for the Beach Cities Advanced Imaging Building. Given the limited scope and duration of construction for the No Project Alternative, construction-related impacts to utilities would be substantially reduced as compared to the proposed Project – including the Phase 1 preliminary site development plan and the more general Phase 2 development program.

Following the demolition of the Beach Cities Health Center and the Beach Cities Advanced Imaging Building, water demand, wastewater generation, and solid waste generation from these buildings would be eliminated. Accordingly, the No Project Alternative would substantially reduce demand on existing utilities at the BCHD campus as compared to existing conditions as well as the proposed Project (see Table 5.5-2).

Table 5.5-2. Estimated Project Site Water Demand Comparison for Existing, No Project Alternative, and Proposed Project Conditions

	Water Demand (gal/year)	Wastewater Generation (gpd)	Solid Waste Generation (tons/year)
Existing Project Site	39,231,667	68,925	330.22
Proposed Project	56,426,355	116,286	660.51
No Project Alternative	8,868,944	11,925	13.32

Notes: gal/year = gallons per year; gpd = gallons per day
Water demand for the No Project Alternative includes water demand of the Providence Little Company of Mary Medical Institute Building and irrigation demand for the turf landscaping. Water demand estimates for irrigation demand are based on the water generation factor used for the proposed Project (Redondo Beach Water Front Project Water Supply Assessment). The area of landscaping was conservatively assumed as equal to the floor area of the Beach Cities Health Center (i.e., 158,000 sf).
The Proposed Project represents total buildout of the Phase 2 development program.
Source: John Labib & Associates 2020 (see Appendix H).

Achievement of Project Objectives

The implementation of the No Project Alternative would eventually eliminate seismic safety and other hazards on the BCHD campus (Project Objective 1). However, continued operation and eventual demolition of the Beach Cities Health Center would not generate revenue through

mission-derived services to support the current level of BCHD programs and services (Project Objective 2), create a modern campus designed to meet the future health needs of residents (Project Objective 5), or address growing future community health needs (Project Objective 6). Rather, the implementation of the No Project Alternative would result in an approximately $2 million reduction in annual funding due to the elimination of tenant-generated revenues from tenants solely within the Beach Cities Health Center. Therefore, the implementation of the No Project Alternative would require a substantial reduction in the level of BCHD programs and services, and would not meet BCHD's mission to *"enhance community health through partnerships, programs, and services for people who live and work in Hermosa Beach, Manhattan Beach, and Redondo Beach."* Further, the No Project Alternative would eliminate the revenue-generating uses that would allow BCHD to provide intergenerational programs and shared gathering spaces (Project Objective 4). While implementation of the No Project Alternative would redevelop the footprint of the Beach Cities Health Center with simple turf landscaping and limit hardscaping following building demolition, this area would not provide sufficient active open space to accommodate programs that meet community health program and service needs (Project Objective 3). Overall, the No Project Alternative would achieve only one of the Project Objectives.

5.5.2 Alternative 2 – Closure, Sale, and Redevelopment of the BCHD Campus

The demolition of the Beach Cities Health Center and the Advanced Imaging Building described for the No Project Alternative would result in a substantial reduction in the funding for BCHD to provide community health and wellness services, undermining its mission as a California Healthcare District. Additionally, these demolition activities may not comply with the Principal Preservation Policy (6130) approved by the BCHD Board of Directors on May 24, 2017, which states:

> *"It is the policy of the Board of Directors of the Beach Cities Health District ("District") to establish guidelines that will insure that the District maintains an Unrestricted Fund Balance generated from rent proceeds, taxes and investment income in an amount sufficient to insure sources of funding for operating the District Services focused on preventive health-related services and programs provided to the three beach cities, including the publicly-owned health facilities known as the Center for Health & Fitness and Adventure Plex. In addition for prudent long term management of District assets, it is further the policy of the Board of Directors to maintain a Committed Fund Balance to be used for continued capital investments in the District."*

Under this alternative BCHD would not renew, or would terminate, existing leases with tenants occupying the Beach Cities Health Center, Beach Cities Advanced Imaging Building, and Providence Little Company of Mary Medical Institute Building. BCHD would not demolish, retrofit, or otherwise redevelop any of the facilities the existing campus, but would instead divest itself of the existing facilities and its current programs and services. Following closure of the Beach Cities Health Center, BCHD would sell the BCHD campus and the vacant Flagler Lot for redevelopment. This could include the sale of both parcels in their entirety or subdivision and a sale of a portion thereof. This one-time influx of capital would be used by BCHD to invest in another property or properties in a different location to generate funds required to provide community health and wellness programs and services. As described in Section 5.4, *Alternatives Considered but Rejected from Further Analysis* it is not anticipated that BCHD would be able to find a property that would allow for the complete off-site development of the proposed Healthy Living Campus; however, BCHD could make investments in smaller properties to that could support some of these uses. Following the sale of the campus, its future redevelopment remains highly speculative. The range of potential likely development scenarios is discussed below.

Given the land use designation and zoning (P-CF) of the existing BCHD campus, permitted future uses for the site include recreational facilities and open space and accessory use/structures (e.g., storage shed, maintenance building, concession stands, etc.) pursuant to RBMC Section 10-2.1110. It is highly unlikely that the BCHD campus would be developed as a recreational facility unless it is acquired by the City of Redondo Beach or the City of Torrance. Other uses permitted on the campus subject to approval of a Conditional Use Permit (CUP) by the City of Redondo Beach include but are not limited to public buildings in recreation areas, agricultural and horticultural uses, child day care centers, community centers, cultural institutions, government offices and maintenance facilities, public gymnasiums and athletic clubs, and performance art facilities. Building setbacks, heights, and densities (i.e., floor area ratio [FAR]) in the P-CF zone are unrestricted, but are subject to Planning Commission Design Review (RBMC Section 10-2.1116).

The vacant Flagler Lot, zoned C-2 (Commercial), would permit commercial uses such as animal feed and supplies, artist's studios, banks and savings and loans, commercial printing, food and beverage sales, maintenance and repair services, recycling collection facilities, restaurants, and government offices. Other uses permitted on the vacant Flagler Lot subject to approval of a CUP by the City of Redondo Beach include but are not limited to ambulance services, bars and cocktail lounges, body art studios, building material sales, business and trade schools, hotels and motels, laboratories, liquor stores, massage businesses, mortuaries, vehicle sales and services, churches, adult day care centers, and senior housing (RBMC Section 10-2.620). Building heights on C-2

properties are restricted to two stories (30 feet) or less and the FAR shall not exceed 0.5 (RBMC Section 10-2.622)**.**

Alternatively, a developer could apply for a zoning change for the BCHD campus and/or the vacant Flagler Lot. However, pursuant to Measure DD, which was approved in 2008, any such zoning changes by the City of Redondo Beach would require a public vote. If the zoning change were to be successful, the BCHD campus and/or the vacant Flagler Lot could be redeveloped as mixed-used multi-family housing that would help the City of Redondo Beach to meet the SCAG's allocation of 1,397 housing units within the City for the 2014-2021 Regional Housing Needs Assessment (RHNA) planned period (refer to Section 3.12, *Population and Housing*).

Construction and Operational Impacts

Given the speculative nature of the redevelopment under this alternative, potential environmental impacts are described generally and qualitatively as compared to the proposed Project. Future development involving discretionary actions by the City of Redondo Beach would require the preparation of a CEQA-compliant environmental document that would analyze the construction-related and operational impacts of the redevelopment.

Given the age and seismic safety hazards as well as the configuration of the Beach Cities Health Center (former South Bay Hospital originally developed in 1958), it can reasonably be assumed that this building would be demolished following sale of the BCHD campus. Demolition of the Beach Cities Health Center would likely occur as described for the Phase 1 preliminary site development plan (refer to Section 2.5.1.6, *Construction Activities*). Demolition activities would occur over a 1-month period and would generate approximately 32,000 cy of demolition debris – including structural steel, wood, glass, flooring, and utility material such as pipes and cables – which would be exported from the Project site in approximately 2,000 haul truck trips. Following the completion of demolition activities, the existing basement would be filled with approximately 14,000 cy of soil imported to the Project site in 875 truck trips over a period of 1 month.

Depending on the whether the BCHD campus is subdivided prior to its sale, the demolition of the Beach Cities Advanced Imaging Building and Providence Little Company of Mary Medical Institute Building may also be desired or required to support redevelopment.

Demolition activities would require the use of typical construction equipment, including an excavator, bulldozers, backhoes, and excavators to break up and remove existing asphalt, concrete, and building materials. A high-reach excavator would be used along with a variety of attachments (e.g., shears, crushers, and hydraulic hammers) to dismantle the structure to avoid flying debris

and minimize dust and noise. Haul trucks would be used to export large amounts of debris to a mixed C&D debris recycling facility approved by the City of Redondo Beach pursuant to a Construction & Demolition Waste Management Plan. Where needed, any existing hazardous materials found during the demolished buildings (i.e., ACM, LBP, PCBs) or soil vapor contamination (i.e., PCE) would be properly handled and disposed of in accordance with regulatory requirements.

Following the completion of demolition activities, the scale and duration of construction activities under this alternative would be dependent upon a specific proposal for redevelopment. For example, if one or both of the parcels were rezoned for residential use, a mixed-use housing development may result in shorter buildings with a larger developed footprint (i.e., reduced open space as compared to the proposed Project). Alternatively, a mixed-use housing development could result in buildings that are taller than what is currently proposed under the Phase 1 preliminary site development plan as well as the Phase 2 development program. Regardless, based on the size of the Project site, it is reasonable to assume that construction activities would occur for a period of between 1 and 3 years, and potentially more depending on the height and density of development. Therefore, construction-related impacts to criteria air pollutant and GHG emissions, noise, and construction traffic associated with this alternative would generally be comparable with the impacts described for the proposed Project. This alternative would also result in ground disturbance involving potential soil erosion and impacts due to soil vapor contamination and hazardous materials at the Project site.

Depending upon the type of uses that would be developed on the BCHD campus and the vacant Flagler Lot (e.g., mixed-use housing), this alternative could also result in substantial increases in operational impacts associated with criteria air pollutant and GHG emissions, noise, and VMT, and increased demand for public services (e.g., police and fire protection, parks, libraries), and utilities (e.g., water, wastewater, etc.).

Relationship of Alternative to Project Objectives

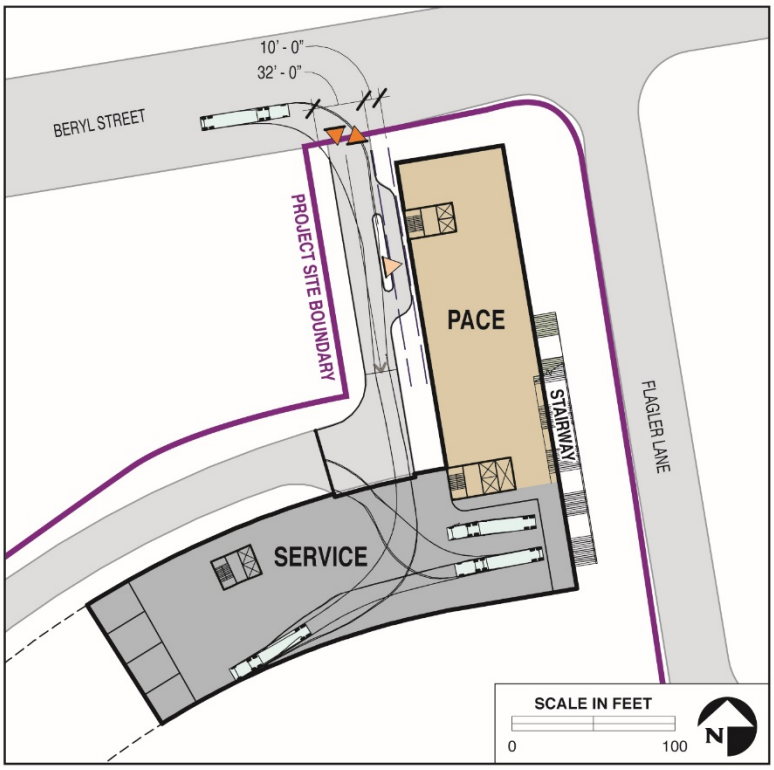
Implementation of this alternative would not include any of BCHD's existing programs and services (e.g., Community Services, CHF, and Memory Care) or community programs and services included in the proposed Project (e.g., Assisted Living, Youth Wellness Center, Wellness Pavilion, Aquatics Center). Therefore, this alternative use would not support Project Objectives to provide intergenerational programs, shared gathering spaces, and facilities integrated with the broader community, or BCHD's mission to meet future community health needs.

Although BCHD owns or leases other small properties within the Beach Cities, the Beach Cities Health Center is BCHD's largest block of medical office building space and provides a substantial portion of BCHD's overall revenue used for community health and wellness program and services. While the one-time influx of capital would be used by BCHD to invest in another property or properties off-site to generate funds required to provide community health and wellness services, closure of the Beach Cities Health Center would eliminate a significant portion BCHD's annual funding for community health and wellness services and many of these programs and services would be reduced or eliminated. Implementation of this alternative would not support BCHD's mission to *"enhance community health through partnerships, programs, and services focused on people who live and work in Redondo Beach, Hermosa Beach, and Manhattan Beach, but with many services available to residents from nearby cities and throughout the South Bay."* Further, this alternative would not involve the addition of public open space to accommodate programs that meet community health needs, provide Assisted Living units with intergenerational programs and shared gathering spaces, create a modern campus that meets the future health needs of residents, or generate sufficient revenue to continue the current level of BCHD programs and services. Therefore, this alternative only meets one of the Project Objectives and generally does not meet BCHD's mission as a California Health District.

5.5.3 Alternative 3 – Revised Access and Circulation

The Revised Access and Circulation Alternative (Alternative 3) would involve implementation of the development of the proposed BCHD Healthy Living Campus Master Plan in two phases, with the same uses described in the Phase 1 preliminary site development Plan and the more general Phase 2 development program. However, this alternative would include a revised access and circulation design in Phase 1 to address concerns raised by the City of Torrance and the residents of the Torrance neighborhood to the east of the Project site related to the proposed vehicle access along Flagler Lane. For example, as described in Section 3.10, *Land Use and Planning*, the one-way driveway and pick-up/drop-off zone exit onto Flagler Lane as well as the service area and loading dock entry/exit onto Flagler Lane may potentially be inconsistent with TMC Section 92.30.8, which prohibits site access to commercial properties from local streets when access from an arterial road is available. The City of Torrance is also considering the potential removal of the southbound vehicle movement along Flagler Lane, between Beryl Street and Towers Street, to address neighborhood concerns regarding existing cut-through traffic, particularly as it relates to pick-up and drop-off at Towers Elementary School. If approved by the City of Torrance, this change to the transportation network would prevent service vehicles from entering the

subterranean service area and loading dock under the proposed Project. Accordingly, this alternative reconfigures the proposed entries/exits along Flagler Lane.

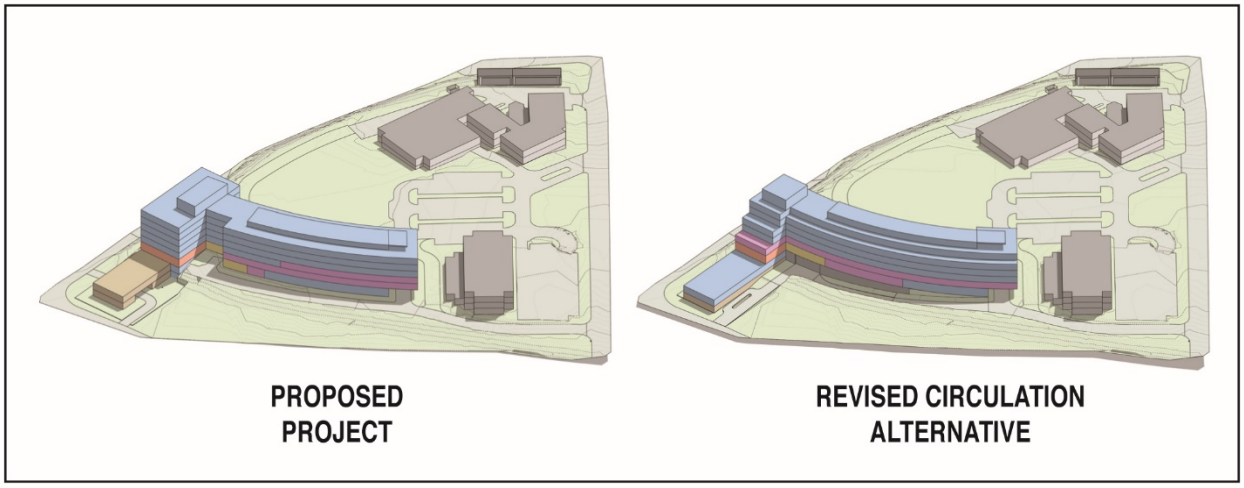


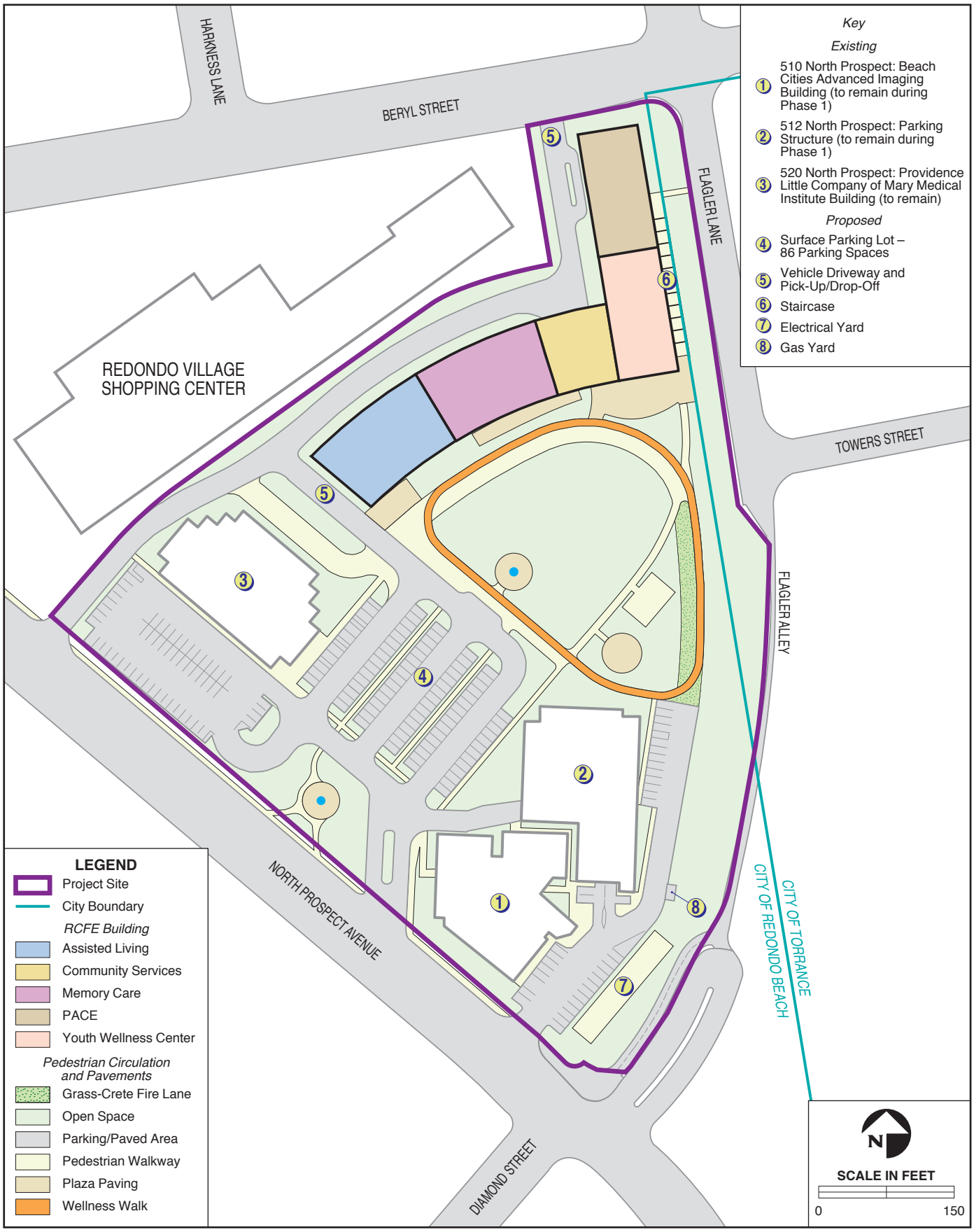
Under Alternative 3, the one-way driveway and pick-up/drop-off zone exit onto Flagler Lane as well as the service area and loading dock entry/exit onto Flagler Lane would be removed and the one-way driveway would be reconfigured. Under Alternative 3, the one-way driveway and passenger pick-up/drop-off zone would be located immediately adjacent to the west of the RCFE Building. Access to the subterranean service area and loading dock beneath the RCFE Building would also be provided immediately adjacent to the west of the RCFE Building. Vehicles picking up or dropping off at the RCFE Building or service vehicles exiting the RCFE Building would continue along a new, paved, internal access road that follows the northern perimeter of the Project site. Vehicles traveling along this one-way perimeter road would continue straight and exit the Project site onto northbound North Prospect Avenue (see Figure 5-1).

The primary entrance to the BCHD campus (i.e., the entrance access to long-term parking on campus) would continue to be provided off of North Prospect Avenue. The main entrance to the campus would be located at the signalized driveway intersection with North Prospect Avenue, approximately 275 feet to the northwest of the intersection of North Prospect Avenue & Diamond Street. This main entrance would continue to provide access to the surface parking lot and subterranean parking garage serving the Providence Little Company of Mary Medical Institute Building. The main entrance would also provide access to the new surface parking lot located within the footprint of the existing Beach Cities Health Center. A secondary driveway would be located approximately 100 feet northwest of the intersection of North Prospect Avenue and Diamond Street, and would provide access to the parking structure located at 512 North Prospect Avenue (see Figure 5-1).

As described for the proposed Project, Alternative 3 would provide 157 Assisted Living units and 60 replacement Memory Care units. The RCFE Building would also include space for PACE, Community Services, and the Youth Wellness Center as generally described for the proposed Project. However, the configuration of the new vehicle entrance and northern perimeter road would displace the proposed grass-crete secondary emergency access to the north of the RCFE Building resulting in an overall reduction in ground level open space.

While the maximum roof height of the RCFE Building would remain the same as for the proposed Project (i.e., approximately 103 feet above the campus ground level and 133.5 feet above the vacant Flagler Lot below), the reconfiguration of the one-way vehicle driveway and pick-up/drop-off zone would allow for PACE to occupy the entire ground floor of the RCFE Building. As such, this alternative would allow for step backs on each floor of the RCFE Building fronting Beryl Street. With this design change, the northern portion of the RCFE Building would decrease in floor area with each successive level, creating terraces that face Beryl Street and setting back the building façade to further minimize the RCFE Building's perceived height from the pedestrian perspective at street level.





wood.

Revised Circulation Alternative

FIGURE 5-1

The Phase 2 development program would be the same as the proposed Project. Construction activities under Alternative 3 would be the same as those described for Phase 1 and Phase 2 of the proposed Project (refer to Section 2.5.1.6, *Construction Activities* and Section 2.5.2.4, *Construction Activities*). The proposed programs and operational activities also would be the same as those described for Phase 1 and Phase 2 of the proposed Project.

Aesthetics and Visual Resources

Under Phase 1 of Alternative 3, impacts to aesthetics and visual resources would be similar, but reduced compared to those described for the proposed Project. For example, the maximum roof height of the RCFE Building in Phase 1 would remain at 103 feet above the campus ground level and 133.5 feet above the vacant Flagler Lot below as described for the proposed Project. However, the reconfiguration of the one-way vehicle driveway and pick-up/drop-off zone would allow for PACE to occupy the entire ground floor of the RCFE Building. As a result, this alternative would allow for step backs on each floor of the RCFE Building fronting Beryl Street. With this design change, the northern portion of the RCFE Building would decrease in floor area with each successive level, creating terraces that face Beryl Street and setting back the building façade to minimize the RCFE Building's perceived height from the pedestrian perspective at street level (e.g., Representative View 3). However, given that the maximum roof height of the RCFE Building, Alternative 3 would still result in potentially significant impacts resulting from the interruption of views of the ridgeline of the Palos Verdes hills from the highpoint of 190th Street & Flagler Lane (i.e., Representative View 6). As described for the proposed Project, MM VIS-1 would require a reduction in the height of the RCFE Building such that it would no longer interrupt this ridgeline. Therefore, impacts to this scenic vista would be *less than significant with mitigation*, as described for the proposed Project.

Implementation of the Phase 2 development program under Alternative 3 would be the same as Phase 2 of the proposed Project. As described for the proposed Project, the heights of the proposed building(s) under the Phase 2 development program would be up to 71.5 feet above the campus ground level and 101.5 feet above the vacant Flagler Lot below, depending upon the final site plan. Following implementation of the Phase 2 development program, views across the Project site from North Prospect Avenue (i.e., Representative View 2) would be obstructed by the proposed building(s) and parking structure. However, as with the proposed Project, the proposed development would meet the development standards described in Redondo Beach General Plan and municipal code. Therefore, similar to the proposed Project, impacts to existing visual character and quality of the site and surrounding areas under Alternative 3 would be *less than significant*.

Alternative 3 would remove the one-way driveway exit onto Flagler Lane and the service area and loading dock entry/exit onto Flagler Lane as described under the proposed Project. Rather than exit onto Flagler Lane, the proposed one-way driveway under Alternative 3 would lead to a new, paved, internal access road that follows the northern perimeter of the Project site. Therefore, Alternative 3 would eliminate vehicle traffic onto Flagler Lane and would completely eliminate the less than significant light impacts from vehicle headlights shining towards the Torrance neighborhood east of Flagler Lane.

Given that the maximum roof heights of the proposed buildings under Alternative 3 would remain the same as for the proposed Project, impacts to shade and shadow would remain similar. The step backs on the proposed RCFE Building would incrementally reduce shading on the Torrance neighborhood to the east, Towers Elementary School, and the multi-family residences north of Beryl Street. As with the proposed Project, implementation of the Phase 1 preliminary site development plan and the Phase 2 development program under this alternative would incrementally increase existing shading on Torrance neighborhood to the east as compared to shadows from the existing Beach Cities Health Center and parking structure; however, this shading would occur only in the evenings (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, impacts to shading from Alternative 3 would be *less than significant*.

Air Quality

Construction Emissions

Construction activities under Alternative 3 would be the same as those described for Phase 1 and Phase 2 of the proposed Project (refer to Section 2.5.1.6, *Construction Activities* and Section 2.5.2.4, *Construction Activities*). Therefore, construction-related impacts to air quality would also be the same as those described for Phase 1 and Phase 2 of the proposed Project (refer to Section 3.2, *Air Quality*). For example, peak daily construction emissions would remain below the SCAQMD thresholds of significance as described for the proposed Project. Similar to the proposed Project, on-site construction emissions would exceed LSTs for PM_{10} and $PM_{2.5}$; however, implementation of MM AQ-1 would require watering of exposed surfaces three times daily and prohibiting demolition when wind speed is greater than 25 mph, and would reduce on-site construction emissions for PM_{10} and $PM_{2.5}$ below the SCAQMD LSTs (refer to Impact AQ-2 in Section 3.2, *Air Quality*). Therefore, with implementation of MM AQ-1, impacts with regard to localized construction emissions would be less than *significant with mitigation*. Additionally, as described for the proposed Project, the use of USEPA Tier 4 engines on all construction equipment (except crushing equipment) would reduce DPM emissions from combustion by 79 to 94 percent.

With the use of Tier 4 engines, DPM emissions anticipated during Phase 1 construction of Alternative 3 would not exceed SCAQMD thresholds for cancer risk (refer to Impact AQ-2 in Section 3.2, *Air Quality*). Therefore, construction-related impacts to air quality under Alternative 3 would be the same as those described for the proposed Project and would be *less than significant with mitigation*.

Operational Emissions

The proposed programs and operational activities would be the same as those described for Phase 1 and Phase 2 of the proposed Project. Additionally, operational vehicle trips and VMT anticipated under Alternative 3 would be the same as those described for the proposed Project. Therefore, operational emissions generated by Alternative 3 – including vehicle trips, electricity and natural gas consumption, and landscaping maintenance – would be to the same as those described for Phase 1 and Phase 2 of the proposed Project. Under Alternative 3, operational air pollutant emissions would continue to be below the SCAQMD mass daily thresholds and LSTs for all air pollutants. Additionally, operation of proposed development under Alternative 3 would not release substantial amounts of toxic air contaminants (TACs), and future residents or visitors of the Project site would not be adversely affected by TAC emissions originating from off-site. Therefore, under Alternative 3, operational air pollutant emissions would be the same as the proposed Project, and would be *less than significant*.

As discussed in Section 3.2, *Air Quality*, the proposed Project would contribute to cumulative traffic in the area and would increase carbon monoxide (CO) levels at nearby intersections, but would not exceed CO thresholds. Similar to the proposed Project, increases in CO emissions associated with this alternative would not cause an exceedance of the Federal or State CO standards and CO hotspot impacts would be *less than significant*.

Additionally, this alternative would include the same uses as described for the proposed Project and would also not result in objectionable odor impacts. Therefore, similar to the proposed Project, impacts related to odors under Alternative 3 would be *less than significant*.

Biological Resources

As previously described, construction activities under Alternative 3 would be the same as those described for Phase 1 and Phase 2 of the proposed Project (refer to Section 2.5.1.6, *Construction Activities* and Section 2.5.2.4, *Construction Activities*). Accordingly, implementation of Alternative 3 would result in the removal of existing landscaped trees, shrubs, and other ground cover that may provide nesting and roosting habitat for migratory birds, including Cooper's hawk

(*Accipiter cooperii*). Vegetation removal during Phase 1 development would include landscaped trees along Diamond Street, Flagler Alley, and Flagler Lane within the jurisdiction of the City of Torrance as well as in the northern area of the Project site to provide space for the proposed footprint of the proposed RCFE Building. Implementation of the Phase 2 development program would also require the removal of vegetation within the interior of the existing BCHD campus. All vegetation removal would occur in compliance with the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code, and vegetation removal within the jurisdiction of the City of Torrance would be subject to compliance with City of Torrance policies, including Policy CR.18.1 of the Torrance General Plan which encourages planting of new trees. Implementation of MM BIO-1 would require that construction activities not disturb active nests during the nesting bird season (i.e., between February 15 and August 31). As described for the proposed Project, BCHD would submit and implement landscape plans that comply with RBMC Section 10-5.1900 (Landscaping Regulations) prior to the initiation of demolition and construction activities for Phase 1 and Phase 2 of Alternative 3. The proposed landscaping, with its emphasis on native trees, would provide enhanced roosting or nesting habitat for resident and migratory birds, including Cooper's hawk. Therefore, long-term impacts to resident and migratory birds protected under the MBTA and California Fish and Game Code would be *less than significant* as described for the proposed Project.

Cultural Resources and Tribal Cultural Resources

Implementation of Alternative 3 would result in the same impacts to historical resources as described for the proposed Project. Phase 1 of Alternative 3 would involve the demolition of the existing Beach Cities Health Center and the attached maintenance building, which are both historic-period structures that are more than 50 years old; however, the Historical Resources Assessment prepared for the BCHD campus in 2018 determined that these buildings did not meet any of the criteria for listing as a historic resource in the California Register of Historical Resources (CRHR) or designation as a local landmark under the Redondo Beach Historic Ordinance (Ord. No. 2554) (refer to Section 3.4, *Cultural Resources and Tribal Cultural Resources*). The other existing structures on the Project site were constructed in 1976 and 1989 and because they are less than 50 years old they are not eligible for listing on the CRHR. Therefore, the demolition of the Beach Cities Health Center and the attached maintenance building under Alternative 3 would not result in a significant impact to historic built resources under the criteria set forth in CEQA Section 15064.5b(3). Further, as described for the proposed Project, implementation of Alternative 3 would not physically damage or substantially change the existing land use or historic context of any historic structures, including the Morell House and the Queen Anne House located 0.12 miles

to the north of the Project site. Therefore, potential impacts to historic structures associated with the Phase 1 preliminary site development plan and Phase 2 development program of Alternative 3 would be *less than significant*, as described for the proposed Project.

Potential impacts to previously unidentified archaeological and paleontological resources, human remains, and tribal cultural resources under this alternative would also be similar to those under the proposed Project. Construction activities, including ground disturbing activities (e.g., excavation, trenching, grading, etc.), under Alternative 3 would be the same as those described for Phase 1 and Phase 2 of the proposed Project (refer to Section 2.5.1.6, *Construction Activities* and Section 2.5.2.4, *Construction Activities*). For example, Phase 1 would begin with the demolition of the existing surface parking lot and associated perimeter circulation road located at the northern edge of the Project site. Subsequent construction of the RCFE Building in Phase 1 would begin with a 26-foot-deep excavation for the subterranean service area and loading dock. Phase 1 construction would also include extensive trenching for installation of utilities, grading to level the site, and demolition of the Beach Cities Health Center and the attached maintenance building. Ground disturbing construction activities associated with the Phase 2 development program would include demolition of the existing above ground parking structure and Beach Cities Advanced Imaging Building, excavation of approximately 11,000 cy of soil, and grading. Given the extensive previous disturbance at and in the immediate vicinity of the Project site, the Project site is unlikely to contain any intact, previously undisturbed archaeological resources, human remains, or tribal cultural resources (refer to Impact CUL-2 in Section 3.4, *Cultural Resources and Tribal Cultural Resources*). Similar to the proposed Project, MM CUL-1 and MM CUL-2 would also apply to this alternative and would substantially reduce potential impacts related to inadvertent discovery of any previously unknown archaeological resources, human remains, and tribal cultural resources to *less than significant with mitigation*.

Energy

As previously described, construction activities under Alternative 3 would be the same as those described for Phase 1 and Phase 2 of the proposed Project (refer to Section 2.5.1.6, *Construction Activities* and Section 2.5.2.4, *Construction Activities*). As such, construction of Alternative 3 would require the same amount of energy consumption for on-site demolition and construction activities, transport of demolition debris, soil, and construction materials, and construction worker commute trips as described for the proposed Project. Electricity would be used during demolition and construction activities to provide temporary power for lighting, electronic equipment, and certain construction equipment (e.g., electric-powered hand tools and other equipment). Energy use during construction would generally not result in a substantial increase in on-site electricity

consumption and would be substantially less than the ongoing energy use on-site under existing conditions at the BCHD campus. Construction-related electricity use would be temporary and negligible over the long-term. Diesel fuel would be required to power heavy construction equipment and haul trucks exporting demolition debris and soil and delivering construction materials to the Project site. Similar to the proposed Project, Alternative 3 would require approximately 1,910,839 gallons of construction fuel, which would represent a very small fraction – less than 1 percent – of Los Angeles County's total annual fuel consumption. Overall energy impacts related to construction of Alternative 3 would be *less than significant*, as described for the proposed Project.

While operation of Alternative 3 would result in the daily consumption of vehicle fuel for trips, Alternative 3 would support sustainable mobility options by locating residential, medical office, office, gym, and restaurant land uses at an infill location close to existing off-site commercial, retail, and recreation (e.g., Dominguez Park) destinations as described for the proposed Project. Additionally, the Project site is close to several stops along Beach Cities Transit Line 102 and would include bicycle parking spaces, lockers, and showers to encourage employees and visitors to use alternative modes of transportation such as bicycling. Therefore, Alternative 3 would not cause wasteful, inefficient, or unnecessary use of transportation energy and impacts would be *less than significant*, as described for the proposed Project.

As described for the proposed Project, operation of Alternative 3 would decrease electricity demand following buildout of the Phase 1 preliminary site development plan and permanently increase the electricity demand following buildout of the Phase 2 development program as compared to existing conditions. The natural gas demand for operation of Alternative 3 would also increase as compared to existing conditions. However, Alternative 3 would incorporate the same sustainability features as described for the proposed Project, such as the installation of photovoltaic solar panels, solar hot water systems, energy-efficient HVAC systems, high-performance insulation, and lighting systems designed with occupancy sensors and dimmers to minimize energy use as described for the proposed Project (refer to Section 2.5.1.5, *Sustainability Features*). New buildings would also meet the equivalent of Leadership in Energy and Environmental Design (LEED) Gold Certification and would be WELL Building Certified. The combination of energy-saving and energy-generating features demonstrates the commitment of Alternative 3 to renewable energy supplies and ensures that operation of Alternative 3 would not use energy in a wasteful or inefficient manner and impacts would be *less than significant*, as described for the proposed Project.

Similar to the proposed Project, Alternative 3 would support the energy conservation and GHG reduction goals and policies established in the Redondo Beach General Plan, Climate Action Plan, Sustainable Development Plan, and Sustainable City Plan, as well as the Torrance General Plan and TMC. Implementation of the sustainable design features described above demonstrate the commitment of Alternative 3 to reduce overall energy demand, including the reliance on non-renewable energy supplies, as called for in the Redondo Beach General Plan, Climate Action and Adaptation Plan, Sustainable Development Plan, and Sustainable City Plan, and the Torrance General Plan and TMC.

Geology and Soils

Impacts related to geological resources and paleontological resources under Alternative 3 would be the same as those described under the proposed Project as geological impacts are generally site-specific and existing geology and soil conditions would be the same as those described for the Project site under Impact GEO-1 in Section, 3.6, *Geology and Soils*. As with the proposed Project, implementation of MM GEO-1 would be required to address geologic impacts related to seismic-related ground failure and liquefaction-related dynamic settlement, drainage and soil erosion during excavation, and potential collapse of excavated slopes. Standard regulatory conditions requiring compliance with the Uniform Building Code (UBC), California Building Code (CBC), RBMC, and TMC would address geologic hazards under this alternative. As with the proposed Project, mitigation and compliance with regulatory conditions would reduce impacts to geology and soils under Alternative 3 to *less than significant with mitigation*.

Additionally, given that this alternative would result in the same area and depth of ground disturbance as the proposed Project, impacts to paleontological resources would be the same (refer to Impact GEO-4 in Section 3.6, *Geology and Soils*). While the Pleistocene-aged alluvium deposits underlying the Project site have a low potential for containing paleontological resources, paleontological resources may still be present and would be protected or collected and deposited in accordance with MM GEO-2a and -2b. Therefore, potential impacts to paleontological resources under this alternative would be *less than significant with mitigation*, as described for the proposed Project.

Greenhouse Gas Emissions and Climate Change

Impacts related to GHG emissions and climate change under Alternative 3 would be the same as those described for the proposed Project. Given that the construction activities and the proposed programs and operational activities under Alternative 3 would be the same as those described for Phase 1 and Phase 2 of the proposed Project, GHG emissions anticipated under Alternative 3 would

be the same as those estimated for the proposed Project (refer to Section 3.7, *Greenhouse Gas Emissions and Climate Change*). Further, because this alternative would include the uses as well as the same sustainability features as the proposed Project, impacts related to conflicts with plans and policies related to reduction in GHG emissions would be the same as those identified in Impact GHG-1 for the proposed Project and would be *less than significant*.

Hazards and Hazardous Materials

Impacts related to hazards and hazardous materials under Alternative 3 would be the same as those described for the proposed Project under Impact HAZ-1 through Impact HAZ-5 in Section 3.8, *Hazards and Hazardous Materials*. This alternative would require similar site preparation activities, including demolition and excavation. Accordingly, this alternative would result in similar risks of exposure to hazardous materials, including potential ACM, LBP, PCBs, and mold that could be released during demolition of the Beach Cities Health Center and the attached maintenance building during implementation of the Phase 1 preliminary site development plan and demolition of above ground parking garage and potentially the Beach Cities Advanced Imaging Building during implementation of the Phase 2 development program (refer to Impact HAZ-2 in Section 3.8, *Hazards and Hazardous Materials*). As described for the proposed Project, Alternative 3 would provide a subterranean service area and loading dock below the Project site in Phase 1 as well as the potential for subterranean parking depending upon the Phase 2 development program option. As such, the area of excavation and trenching would be similar to the proposed Project. Therefore, the potential for exposure to contaminated soils (i.e., PCE, benzene, and chloroform) would be similar (refer to Impact HAZ-2 in Section 3.8, *Hazards and Hazardous Materials*). Overall, impacts with regard to hazards and hazardous materials under this alternative would be similar to those described under the proposed Project. As such, MM HAZ-1, MM HAZ-2a through -2d, and MM HAZ-3 would require hazardous materials surveys, standard protocols following discovery of contamination, soils management plan, soil vapor monitoring, and enrollment in the California Geologic Energy Management Division's (CalGEM's) Well Review Program. Compliance with standard regulatory conditions and mitigation measures would reduce impacts to *less than significant with mitigation*, as describe for the proposed Project.

Hydrology and Water Quality

Construction

Construction-related impacts related to hydrology and water quality under Alternative 3 would be the same as those described for the proposed Project. As previously described, construction activities under Alternative 3 would be the same as those described for Phase 1 and Phase 2 of the

proposed Project (refer to Section 2.5.1.6, *Construction Activities* and Section 2.5.2.4, *Construction Activities*). As with the proposed Project, construction of Alternative 3 would involve major earthwork, including excavation and shoring for subterranean levels, grading, and trenching for utilities, which would disturb the underlying soils and expose them to potential erosion and sediment transport into adjacent storm drain inlets – particularly during storm events or during on-site watering. This stormwater runoff could also contain eroded C&D debris and associated hazardous materials that would potentially further degrade surface water quality in the vicinity of the Project site, including the Santa Monica Bay. Potential adverse effects on water quality associated with Alternative 3 would be reduced through compliance with the requirements of the Construction General Permit (SWRCB Order No. 2009-0006-Data Quality Assessment). Implementation of BMPs developed in accordance with the requirements of the Construction General Permit would prevent violation of water quality standards and minimize the potential for contributing polluted runoff during construction of Alternative 3. Therefore, construction-related impacts to water quality would be *less than significant*, as described for the proposed Project.

Similar to the proposed Project, Alternative 3 would include excavation to a maximum depth of 26 feet below ground surface (bgs) for the subterranean service area and loading dock of the RCFE Building during Phase 1 as well as the subterranean levels of the proposed parking structure depending upon the Phase 2 development program option. Given that the depth to groundwater at the Project site is greater than 61.5 feet bgs, dewatering activities would not be required. Additionally, construction activities associated with Alternative 3 (e.g., equipment cleaning, dust control, and production of concrete) would not substantially deplete groundwater supplies as water demand would be nominal and less than the existing water demand occurring on-site. Therefore, construction impacts to groundwater levels would be *less than significant*, as described for the proposed Project.

Operation

As described for the proposed Project, implementation of Alternative 3 would improve water quality and groundwater recharge by reducing the volume of runoff and improving infiltration at the Project site. Alternative 3 would develop impervious surfaces that are relatively similar in type to those currently on the Project site (e.g., rooftops, roadways, driveways, pedestrian walkways, etc.). Alternative 3 would require the construction of a paved perimeter access road, which would displace the proposed grass-crete and incrementally increase impervious surfaces compared to the proposed Project (refer to Figure 5-1). Nevertheless, Alternative 3 would still result in a net reduction in the total amount impervious surface area compared to existing conditions and would reduce the potential for pollutants to become exposed during storm events. The reduction in the

amount of impervious surfaces on-site and compliance with all applicable State and local regulations, such as the Redondo Beach Stormwater Management and Discharge Control Ordinance, would ensure that operational impacts to water quality would be *less than significant.* Further, implementation of Alternative 3 would improve groundwater recharge at the Project site and there would be *no impact* to groundwater quality, as described for the proposed Project.

Additionally, as described for the proposed Project in Impact HYD-3, Phase 1 of Alternative 3 would involve the construction of an on-site infiltration system designed to retain, treat, and infiltrate the 85th percentile storm into the groundwater. The existing storm drain infrastructure discharging to the City of Torrance municipal storm drain system at the storm drain line beneath Flagler Lane would be abandoned in place. Any flows larger than the design storm would be conveyed to North Prospect Avenue, where it would be conveyed through the curb and gutter to the nearest catch basin maintained by the City of Redondo Beach. These facilities have excess capacity and would continue to adequately serve the Project site with the implementation of Alternative 3. Therefore, as described for the proposed Project, Alternative 3 would have a *less than significant* impact on drainage capacity in the vicinity of the Project site.

Similar to the proposed Project, Alternative 3 would be required to comply with the requirements of the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. Alternative 3 would also implement BMPs, such as sediment and erosion controls, to prevent polluted discharge or runoff that would adversely affect water quality. Therefore, through compliance with the NPDES program, Alternative 3 would be consistent with the California Ocean Plan (Ocean Plan) and the Water Quality Control Plan for the Los Angeles Basin (Basin Plan). Additionally, Alternative 3 would support objectives of the Groundwater Basin Master Plan (GBMP) by increasing the area of impervious surfaces and associated infiltration on the Project site. Since Alternative 3 would generate the same amount of water demand as the proposed Project, implementation of Alternative 3 would not increase water demand to a level beyond what can be adequately met by existing and future water supplies as described for the proposed Project. Therefore, Alternative 3 would not conflict with implementation of any water quality control plans or sustainable groundwater management plans (i.e., the Ocean Plan, Basin Plan, GBMP, and 2015 Urban Water Management Plan [UWMP]) and impacts would be *less than significant*.

Land Use and Planning

As previously described, Alternative 3 would include an alternative access and circulation design in Phase 1, which would remove the one-way driveway and pick-up/drop-off zone exit onto Flagler Lane and the service area and loading dock entry/exit onto Flagler Lane. This would remove the

need for a grading or building permit from the City of Torrance. (Landscape plan approval would still be required for the proposed landscaping within the City of Torrance right-of-way.) Under Alternative 3, the one-way driveway would be reconfigured with entry provided via a right-turn along Beryl Street, located immediately adjacent to the west of the RCFE Building. Rather than exit onto Flagler Lane, the proposed one-way driveway would lead to a new, paved, internal access road that follows the northern perimeter of the Project site. As described in Section 3.10, *Land Use and Planning*, TMC Section 92.30.8 prohibits site access to commercial properties from local streets when access from an arterial road is available. Additionally, the City of Torrance is also considering the potential removal of the southbound traffic along Flagler Lane between Beryl Street and Towers Street, to address neighborhood concerns regarding existing cut-through traffic. If approved by the City of Torrance, this change to the transportation network would prevent service vehicles from entering the subterranean service area and loading dock under the proposed Project. Implementation of Alternative 3 would remove vehicle access from Flagler Lane within the City of Torrance and therefore, would be consistent with TMC Section 92.30.8. Alternative 3 would be consistent with all other applicable land use plans, policies, and regulations. Therefore, impacts to land use and planning under Alternative 3 would be *less than significant*.

Noise

Construction

Under Alternative 3, impacts related to construction noise would be the same as those described for the proposed Project. The maximum roof height of the RCFE Building in Phase 1 would 103 feet above the campus ground level and 133.5 feet above the vacant Flagler Lot below, as described for the proposed Project. Additionally, the proposed building(s) under the Phase 2 development program would be up to 71.5 feet above the campus ground level and 101.5 feet above the vacant Flagler Lot below, depending upon final site plan. As described for the proposed Project, construction activities would result in increased noise levels that would impact surrounding noise-sensitive receptors. The necessary noise barrier heights required to mitigate the noise from construction activities above 30 feet are considered infeasible (refer to Impact NOI-1 in Section 3.11, *Noise*). Compliance with existing local noise regulations along with the implementation of MM NOI-1, which would require preparation and implementation of a Construction Noise Management Plan, would reduce potential noise impacts. However, *significant and unavoidable* noise impacts would occur throughout the duration of the proposed construction activities.

Similar to the proposed Project, ground-borne vibration would be generated from the use of heavy construction equipment at the Project site, which could potentially expose existing sensitive land

uses in the vicinity to excessive vibration. However, vibration levels as described for the proposed Project, these impacts would be *less than significant*.

Operation

Under Alternative 3, impacts related to operational vehicle noise would be similar to, but less severe than under the proposed Project. Under this alternative, the one-way driveway and pick-up/drop-off loading zone would be located immediately adjacent to the west of the RCFE Building and would be reconfigured, with entry provided via a right-turn along Beryl Street. Rather than exit onto Flagler Lane, the proposed one-way driveway under Alternative 3 would lead to a drop-off/pick-up zone as well as access to a subterranean service area and loading dock beneath the RCFE Building. As a result, Alternative 3 would further reduce less than significant operational noise levels at nearby sensitive receptors from vehicles exiting the one-way driveway onto Flagler Lane (refer to Impact NOI-3 in Section 3.11, *Noise*). Alternative 3 would also further reduce less than significant noise levels at nearby sensitive receptors from trash pick-up and delivery operations, including compacting operations and travel along Flagler Lane.

Long-term operational noise impacts from HVAC equipment, parking operations, and on-site noise activities associated with Alternative 3 (i.e., outdoor seating, fitness classes, amplified music, etc.) would be the same as those described for the proposed Project (refer to Impact NOI-3 in Section 3.11, *Noise*). Therefore, impacts related to operational noise under Alternative 3 would be reduced compared to the proposed Project and *less than significant with mitigation*.

Population and Housing

Impacts related to population and housing under Alternative 3 would be the same as those described for the proposed Project under Impact PH-1 in Section 3.12, *Population and Housing*. As described for the proposed Project, Alternative 3 would provide 157 Assisted Living units and 60 replacement Memory Care units for a total of 217 residential units. Assuming 100 percent occupancy of the 157 new Assisted Living units (177 new permanent residents) and that none of the Assisted Living residents would come from the existing population of Redondo Beach, implementation of Alternative 3 would increase the population of the Redondo Beach by less than 1 percent (0.3 percent increase); therefore, the maximum population increase would be negligible. This minor increase in population would be consistent with and well within SCAG's growth projections. Increases in employment under Alternative 3 would also be similar to the proposed Project. Since the Project site is already served by existing roads and infrastructure, Alternative 3 would not require the creation of new roads or other infrastructure that would induce new development and population growth beyond this alternative. Local job availability would be

expected to increase negligibly by approximately 170 jobs (0.5 percent), in line with SCAG growth projections. Employment opportunities would likely be filled by members of the local and regional labor force. Potential increases in the low- and moderate-income work force within Redondo Beach could incrementally increase demand for affordable housing within the City; however, it is expected that most employees would live in surrounding nearby cities and commute to Redondo Beach, as described for the proposed Project. This impact would be *less than significant* as there is sufficient regional housing availability to meet these demands.

Public Services

Under Alternative 3, impacts to demand for fire protection and EMS provided by RBFD as well as police protection services provided by RBPD would be the same as those described for the proposed Project under Impact PS-1 and Impact PS-2. Alternative 3 – including the Phase 1 preliminary site development plan and the Phase 2 development program – would result in an increase in residents, employees, and visitors at the BCHD campus, and could incrementally increase the demand for fire protection and EMS services provided by RBFD as well as other non-emergency services as compared to existing conditions at the Project site. However, as described for the proposed Project, the BCHD campus would generate a conservative estimate of 244 emergency calls per year, which would constitute approximately 3 percent of the total RBFD responses. Development under Alternative 3 would continue well within the 6-minute fire response time area and 6-minute and 20-second EMS response time for the RBFD. As described for the proposed Project, prior to the issuance of Certificates of Occupancy for the development under Phase 1 and Phase 2, BCHD would coordinate with the RBFD and the RBPD to prepare an Emergency Response Plan for the BCHD campus. Additionally, the addition of 177 Assisted Living residents to the BCHD campus would not substantially alter the existing ratio of police officers to residents. Therefore, environmental impacts resulting from increased demands for fire protection and EMS provided by RBFD as well as police protection provided by RBPD for Phase 1 and Phase 2 of Alternative 3 would be *less than significant*.

Transportation

Construction Traffic

Construction activities under Alternative 3 would be the same as those described for Phase 1 and Phase 2 of the proposed Project (refer to Section 2.5.1.6, *Construction Activities* and Section 2.5.2.4, *Construction Activities*). Therefore, construction-related impacts to the transportation network would be the same as those described for Phase 1 and Phase 2 of the proposed Project. For example, as with the proposed Project, construction activities associated with Alternative 3

would result in approximately 5,927 haul truck trips during the 29-month Phase 1 construction period and approximately 3,809 haul truck trips during the 28-month Phase 2 construction period. Construction-related increases in VMT would occur intermittently and would be temporary and short-term in nature. Increased construction traffic on freeways and streets, particularly large haul trucks and other heavy equipment (e.g., cement trucks and cranes), may disrupt traffic flows, reduce lane capacities, and generally slow traffic movement. In addition, such traffic could interfere with or delay transit operations and disrupt bicycle and pedestrian circulation, particularly on North Prospect Avenue and Beryl Street (refer to Impact T-3 in Section 3.14, *Transportation*). Implementation of MM T-2 would reduce impacts related to construction traffic, associated VMT, and public safety by requiring the preparation of a Construction Traffic and Access Management Plan (refer to Section 3.14, *Transportation*). Therefore, Alternative 3 impacts to transportation during construction would be the same as those described for the proposed Project and *less than significant with mitigation*, as described for the proposed Project.

Operational Traffic

Under Alternative 3, the one-way driveway and pick-up/drop-off zone would be reconfigured with entry provided via a right-turn along Beryl Street, located immediately adjacent to the west of the RCFE Building. Rather than exiting onto Flagler Lane, the proposed one-way driveway would lead to a new, paved, internal access road that follows the northern perimeter of the Project site. Vehicles traveling along this one-way perimeter road would continue straight and exit the Project site onto northbound North Prospect Avenue (refer to Figure 5-1). As with the proposed Project, implementation of Alternative 3 would generate an increase in vehicle entry into Flagler Lot provided via a right-turn along Beryl Street. The implementation of Alternative 3 could result in an increase in vehicle-bus conflicts associated with stopped buses at the Beach Cities Transit stop and vehicles turning right into the proposed one-way driveway (refer to Impact T-3 in Section 3.14, *Transportation*). Therefore, MM T-3 would require the existing Beach Cities Transit Line 102 bus stop be relocated to the east of the proposed one-way driveway entrance along Beryl Street to avoid the potential for safety hazards associated with transit.

Increased vehicle entry along eastbound Beryl Street could also block, delay, or increase traffic hazards associated with existing pedestrian and bicyclist traffic along the south side of Beryl Street. As described for the proposed Project, the proposed one-way driveway under Alternative 3 would be designed in accordance with applicable RBMC standards, and sight distances would be approved by the Redondo Beach Community Development Department during site plan approval.

As described in Section 3.14, *Transportation*, if the City of Torrance's temporary one-way closure of southbound traffic on Flagler Lane is successful and neighborhood residents support it, the one-way closure could become permanent. Implementation of a permanent closure of southbound traffic on Flagler Lane south of Beryl Street would preclude access for service and delivery vehicles to the subterranean proposed service area and loading dock under the proposed Project. Therefore, under the proposed Project service and delivery vehicles would be required to drive through the Torrance neighborhood to enter the service area and loading dock entrance, which would present a potential conflict associated with cut-through traffic. Under Alternative 3, the alternative access and circulation design would remove the one-way driveway and pick-up/drop-off zone exit onto Flagler Lane and the service area and loading dock entry/exit onto Flagler Lane. Service and delivery vehicles would be directed to the reconfigured one-way driveway off of Beryl Street. Therefore, service and delivery vehicles would not require access along Flagler Lane and implementation of the one-way closure of southbound traffic on Flagler Lane would not present a conflict with Alternative 3 associated with cut-through traffic.

Given that the proposed programs and operational activities under Alternative 3 would be the same as those described for Phase 1 and Phase 2 of the proposed Project, operational vehicle trips and VMT would also be the same as those described for Phase 1 and Phase 2 of the proposed Project. While not required to mitigate a significant impact, implementation of the recommended MM T-1 would include preparation and implementation of a comprehensive TDM plan, which would provide trip reduction strategies for BCHD employees, tenants, and campus visitors, as described for the proposed Project (refer to Section 3.14, *Transportation*).

Implementation of MM T-3 would permanently relocate the existing Beach Cities Transit Line 102 bus stop located west of Flagler Lot to the east of the proposed one-way driveway along eastbound Beryl Street.

Utilities and Service Systems

Water Infrastructure and Supply

As previously described, construction activities under Alternative 3 would be the same as those described for Phase 1 and Phase 2 of the proposed Project (refer to Section 2.5.1.6, *Construction*

Activities and Section 2.5.2.4, *Construction Activities*). As such, construction-related impacts to water infrastructure and supply under Alternative 3 would also be the same as those described for Phase 1 and Phase 2 of the proposed Project (refer to Section 3.15.1, *Water Infrastructure and Supply*). Construction-related impacts associated with Alternative 3 would include temporary water use for dust control, equipment cleaning, and re-compaction and grading activities and disposal of demolition debris. As described for the proposed Project, temporary impacts related to construction would occur for a period of approximately 29 months during implementation of the Phase 1 preliminary site plan and 28 months during implementation of the Phase 2 development program. Alternative 3 would connect to California Water Company's (Cal Water's) water supply system with a new 8-inch lateral installed within the Project site, which would connect to the proposed RCFE Building to the 8-inch water line along North Prospect Avenue adjacent to the northwest of the central driveway. No other water lines would be affected by Alternative 3. In addition to the proposed laterals, Alternative 3 may also include a connection to the existing 4-inch diameter purple pipe along Diamond Street, Flagler Alley, and Flagler Lane (for recycled water). As described for the proposed Project, all work associated with the proposed water lateral would be subject to review and approval by the Redondo Beach Department of Public Works. Alternative 3 impacts on water infrastructure from construction activities would be *less than significant*, as described for the proposed Project.

The existing water flow and pressure at the Project site is adequate to serve Alternative 3 in accordance with Appendix B of the 2016 California Fire Code (John Labib & Associates 2020). Cal Water's potable water system has the infrastructure and the capacity to serve Alternative 3. Cal Water provided a will serve letter to BCHD on November 12, 2019 indicating that after all of the required permits are obtained, Cal Water will provide water service in accordance with the rules and regulations of the California Public Utilities Commission (CPUC) (Cal Water 2019). Given that Alternative 3 would result in the same building square footage and uses as the proposed Project, Alternative 3 would be adequately served by Cal Water's existing water entitlements. Additionally, Alternative 3 may also include a connection to the existing 4-inch diameter purple pipe along Diamond Street, Flagler Alley, and Flagler Lane (for recycled water), as described for the proposed Project. Recycled water could be used for landscape irrigation and architectural water features, water for mechanical cooling towers, and water for toilet flushing in order to reduce overall water demand under Alternative 3. Therefore, Alternative 3 would be consistent with local policies and operational impacts on potable water use would be *less than significant*, as described for the proposed Project.

Wastewater Collection, Conveyance, and Treatment

Construction-related impacts to wastewater under Alternative 3 would also be the same as those described for Phase 1 and Phase 2 of the proposed Project (refer to Section 3.15.2, *Wastewater Collection, Conveyance, and Treatment*). As described for the proposed Project, portable toilets would be provided by a private waste management company during C&D activities under Phase 1 and Phase 2 of Alternative 3, and all waste would be disposed of off-site. No groundwater is anticipated to be encountered and/or discharged to the existing sewer system during construction, including ground disturbing activities such as excavation. Therefore, construction activities would not generate wastewater flows and would not, along with existing and projected wastewater flows, approach the existing capacity of the Joint Water Pollution Control Plant (JWPCP).

Construction impacts would primarily involve trenching on-site to install the new sewer connections to the existing sewer lines along Diamond Street and Beryl Street. Prior to ground disturbance, all proposed work associated with the sewer connections would be subject to review and approval by the Redondo Beach Department of Public Works. (Neither the existing facilities nor the proposed facilities on the BCHD campus would discharge wastewater to the City of Torrance sewer system.) All appropriate permits would be obtained, and the construction contractor would be required to notify the Redondo Beach Public Works Department in advance of ground disturbance activities to avoid disruption of sewer service to off-site properties. Similar to the proposed Project, impacts on wastewater infrastructure from construction activities associated with Alternative 3 would be *less than significant.*

Given that Alternative 3 would result in the same building square footage and uses as the proposed Project, operation of Alternative 3 would generate the same amount of wastewater as the proposed Project. Therefore, development proposed under the Phase 1 preliminary site development plan would decrease wastewater generation at the Project site compared to existing conditions. Implementation of the Phase 2 development program under Alternative 3 would increase wastewater generation at the Project site compared to Phase 1 and existing conditions. However, the Sewer Capacity Study prepared for the proposed Project concluded, after calculating the proposed sewer flow, the existing sewer lines along Diamond Street and Beryl Street could adequately accommodate the proposed sewer flow without upgrades. Additionally, the Los Angeles County Sanitation District (LACSD) South Bay Cities Main Trunk Sewer has adequate remaining capacity (2.1 million gallons per day [mgd]) to convey the increase in sewage flow of 47,361 gallons per day (gpd) (118,402.5 gpd peak flow) associated with Alternative 3. Therefore, implementation of Alternative 3 would result in a *less than significant* impact on existing wastewater infrastructure.

In addition, the JWPCP, which receives and treats wastewater from the Project site, has approximately 139 mgd of additional capacity and could adequately accommodate the increase in wastewater generation resulting from Alternative 3. Therefore, impacts related to wastewater treatment capacity would be *less than significant*, as described for the proposed Project.

Solid Waste Management Services

Similar to the proposed Project, Alternative 3 would be required to comply with the Redondo Beach Construction and Demolition Ordinance, including submittal of a waste management plan that would divert at least 50 percent of materials generated during C&D from landfills. The C&D waste would be delivered to certified C&D waste processors within the region where it would be recycled, as feasible. Given that Alternative 3 would develop the same building square footage and land uses as the proposed Project, the solid waste associated with Alternative 3 would be the same as that described for the proposed Project. The solid waste associated with Alternative 3 would represent a very small percentage of the inert waste disposal capacity in the region. Therefore, Alternative 3 create a need for additional solid waste disposal facilities to adequately handle Project construction-generated inert waste and impacts would be *less than significant.*

Relationship of Alternative to Project Objectives

Alternative 3 would attain all of the Project Objectives. By vacating and demolishing the Beach Cities Health Center in Phase 1, Alternative 3 would eliminate the seismic safety and other hazards of this building (Project Objective 1). Development of the 157 Assisted Living units and 60 replacement Memory Care units in Phase 1 would generate sufficient revenue to support BCHD's current level of programs and services as well as address future community health needs (Project Objectives 2 and 6). As described for the proposed Project, Alternative 3 would integrate these Assisted Living and Memory Care facilities with the broader community through intergenerational programs and shared gathering spaces within the other public health and wellness facilities on campus, such as the Aquatics Center and CHF (Project Objective 4). The proposed space for PACE, Community Services, and the Youth Wellness Center included in the Phase 1 preliminary site development plan as well as the Wellness Pavilion, Aquatics Center, and CHF included in the Phase 2 development program would support programs that address growing future community health needs (Project Objective 6). Redevelopment of the BCHD campus with the proposed RCFE Building in Phase 1 and proposed buildings(s) included in the Phase 2 development program would create a modern campus with facilities designed to meet the future health needs of residents (Project Objective 5). Although the configuration of the new vehicle entrance and northern perimeter road would eliminate the grass-crete as described for the proposed Project all other

public open space (e.g., central lawn, Main Street promenade, sensory gardens, etc.) would be developed as described for the proposed Project. The public open space proposed for the interior of the Project site would be able to accommodate programs that meet community health needs and provide a meeting space for public gatherings and interactive education (Project Objectives 3 and 5).

5.5.4 Alternative 4 – Phase 1 Preliminary Site Development Plan Only

Alternative 4 would include the development described for the Phase 1 preliminary site development plan under the proposed Project; however, none of the uses under the Phase 2 development program (i.e., Wellness Pavilion, Aquatics Center, and CHF) would be developed on the BCHD campus.

Alternative 4 would include development of the RCFE Building including the 157 new Assisted Living units and 60 replacement Memory Care units as well as the PACE, Community Services, and Youth Wellness Center described under Section 2.5.1, *Phase 1 Preliminary Site Development Plan*. Following the development of the RCFE Building, demolition of the Beach Cities Health Center would also occur as described for the proposed Project. The maximum roof height of the RCFE Building would be the same as for the proposed Project (i.e., approximately 103 feet above the campus ground level and 133.5 feet above the vacant Flagler Lot below). Given the potential inconsistency of the proposed Project with the TMC Section 92.30.8 and the City of Torrance's ongoing consideration of the removal of the southbound movement along Flagler Lane, this alternative would also include the alternative access and circulation design described in Alternative 3, with a right-turn access from Beryl Street and no vehicle entry/exit onto Flagler Lane. Similar to Alternative 3, the alternative access and circulation design under this alternative would allow for step backs on each floor of the RCFE Building fronting Beryl Street. As such, this northern portion of the RCFE Building would incrementally decrease in floor area with each successive level, creating terraces that face Beryl Street and setting back the building façade to minimize the effect of the RCFE Building's perceived height from the pedestrian perspective at street level.

Given that none of the uses described under the Phase 2 development program (i.e., Wellness Pavilion, Aquatics Center, and CHF) would be developed on the BCHD campus, the CHF would remain off-site permanently. Additionally, the landscaped 40,725-sf landscape surface parking lot constructed within the footprint of the Beach Cities Health Center would remain in place. Alternative 4 would not involve the demolition of the Beach Cities Advanced Imaging Building or the parking structure located at 512 North Prospect Avenue and a new parking structure would

not be constructed. As such, this alternative would provide more publicly accessible open space within the interior of the Project site.

Construction activities under Alternative 4 would be limited to those described under Section 2.5.1.6, *Construction Activities*. Therefore, this alternative would have only one phase of construction that would occur over a period of 29 months. Operational activities under Alternative 4 would be the same as those described for Phase 1 of the proposed Project.

Aesthetics and Visual Resources

Long-term impacts to aesthetics and visual resources would be the same as those described for Phase 1 under Alternative 3. The reconfiguration of the one-way vehicle driveway and pick-up/drop-off zone would allow for step backs on each floor of the RCFE Building fronting Beryl Street. With this design change, the northern portion of the RCFE Building would incrementally decrease in floor area with each successive level, creating terraces that face Beryl Street and setting back the building façade to minimize the effect of the RCFE Building's perceived height from the pedestrian perspective at street level. However, given that the maximum roof height of the RCFE Building in Phase 1 would remain as described for the proposed Project, Alternative 4 would still result in potentially significant impacts related to interruption of views of the Palos Verdes hills ridgeline from the highpoint at 190th Street & Flagler Lane (i.e., Representative View 6). As described for the proposed Project, MM VIS-1 would require a reduction in the height of the RCFE Building so that it would not interrupt the ridgeline. Therefore, impacts to this scenic vista from 190th Street would be *less than significant with mitigation*, as described for the proposed Project.

Under Alternative 4, construction and operational activities proposed under the Phase 2 development program would not occur. As such, under this alternative, views across the Project site and to the RCFE Building from North Prospect Avenue (i.e., Representative View 5) would not be obstructed. As with the proposed Project, the proposed development under Phase 1 would meet the development standards described in Redondo Beach General Plan and municipal code. Therefore, similar to the proposed Project, impacts to existing visual character and the visual quality of the Project site and surrounding areas would be *less than significant*.

As with the proposed Project, the implementation of the Phase 1 preliminary site development plan under this alternative would incrementally increase existing shading on Torrance neighborhood to the east as compared to shadows from the existing Beach Cities Health Center and parking structure; however, as with the proposed Project shading under this alternative would occur only in the evenings (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, impacts to shading from Alternative 4 would be *less than significant*, as

described for the proposed Project. Additional shading impacts associated with the Phase 2 development program would be eliminated since this alternative would not include the construction of an Aquatic Center, Wellness Pavilion, CHF development, or the parking structure proposed under the Phase 2 development program (refer to Impact VIS-4 in Section 3.1, *Aesthetics and Visual Resources*).

Air Quality

Construction Emissions

Construction activities under Alternative 4 would be the same as those described for Phase 1 of the proposed Project (refer to Section 2.5.1.6, *Construction Activities*). However, under this alternative, none of the construction activities described under the Phase 2 development program would occur.

Similar to the proposed Project, on-site construction emissions during Phase 1 would exceed LSTs for PM_{10} and $PM_{2.5}$; however, implementation of MM AQ-1 would require watering of exposed surfaces three times daily and prohibiting demolition when wind speed is greater than 25 mph, reduce on-site construction emissions for PM_{10} and $PM_{2.5}$ below the SCAQMD LSTs (refer to Impact AQ-2 in Section 3.2, *Air Quality*). Therefore, with implementation of MM AQ-1, impacts with regard to localized construction emissions would be less than *significant with mitigation*, as described for the proposed Project. Additionally, as described for the proposed Project, the use of USEPA Tier 4 engines on all construction equipment (except crushing equipment) would reduce DPM emissions from combustion by 79 to 94 percent. With the use of Tier 4 engines, DPM emissions anticipated during Phase 1 construction of Alternative 4 would not exceed SCAQMD thresholds for cancer risk (refer to Impact AQ-2 in Section 3.2, *Air Quality*). Therefore, construction-related impacts to air quality under Alternative 4 would be the same as those described for the Phase 1 proposed Project and would be *less than significant with mitigation*.

Operational Emissions

The proposed programs and operational activities would be the same as those described for Phase 1 of the proposed Project; however, the proposed programs and operational activities described for Phase 2 (i.e., Wellness Pavilion, Aquatics Center, CHF) would not occur under Alternative 4. Additionally, operational vehicle trips and VMT anticipated under Alternative 4 would be the same as those described for Phase 1 of the proposed Project. Therefore, operational emissions generated by Alternative 4 (including vehicle trips, electricity and natural gas consumption, and landscaping maintenance) would be similar to those described for Phase 1 of the proposed Project but those

described under Phase 2 would not occur. Under Alternative 4, demolition of the existing Beach Cities Health Center without construction of the Wellness Pavilion, Aquatics Center, and CHF under Phase 2, operational air pollutant emissions would be substantially reduced compared to the proposed Project and existing conditions. Additionally, operation of proposed development under Alternative 4 would not release substantial amounts of TACs, and future residents or visitors of the Project site would not be adversely affected by TAC emissions originating from off-site. Therefore, under Alternative 4, operational air pollutant emissions would be substantially reduced as compared to the proposed Project, and would be *less than significant*.

Without the development of the proposed Aquatics Center and with the permanent relocation of CHF off-site, Alternative 4 would eliminate the net new vehicle trips generated by the proposed Project (refer to section 3.14, *Transportation*). As such, implementation of Alternative 4 would likely result in reduced CO levels at nearby intersections, and would not exceed CO thresholds as compared to existing conditions. Therefore, impacts related to odors under Alternative 4 would be *less than significant*.

Additionally, this alternative would include the same uses as the proposed Project and, as such, would also not result in objectionable odor impacts, similar to the proposed Project. Therefore, impacts related to odors under Alternative 4 would be *less than significant*.

Biological Resources

As previously described, construction activities under Alternative 4 would be the same as those described for the Phase 1 preliminary site development plan (refer to Section 2.5.1.6, *Construction Activities*), and construction activities described for the Phase 2 development program in Section 2.5.2.4, *Construction Activities* would not occur. Because Alternative 4 would not involve construction activities associated with the Phase 2 development, landscaped trees and shrubs located within the interior of the existing BCHD campus would remain, resulting in slightly reduced impacts to biological resources than would occur under the proposed Project. All vegetation removal would occur in compliance with the MBTA and California Fish and Game Code, and vegetation removal within the jurisdiction of the City of Torrance would be subject to compliance with City of Torrance policies, including Policy CR.18.1 of the Torrance General Plan which encourages planting of new trees. Implementation of MM BIO-1 would require that construction activities not disturb active nests during the nesting bird season (i.e., between February 15 and August 31). As described for the proposed Project, BCHD would submit and implement landscape plans that comply with RBMC Section 10-5.1900 (Landscaping Regulations) prior to the initiation of demolition and construction activities for Phase 1. The

proposed landscaping, with its emphasis on native trees, would provide enhanced roosting or nesting habitat for resident and migratory birds, including Cooper's hawk. Therefore, long-term impacts to resident and migratory birds protected under the MBTA and California Fish and Game Code would be *less than significant*, as described for the proposed Project.

Cultural Resources and Tribal Cultural Resources

Implementation of Alternative 4 would result in the similar impacts to historical resources as described for the proposed Project. Similar to the proposed Project, Phase 1 of Alternative 4 would involve the demolition of the existing Beach Cities Health Center and the attached maintenance building, which are both historic-period structures that are more than 50 years old; however, the Historical Resources Assessment prepared for the BCHD campus in 2018 determined that these buildings did not meet any of the criteria for listing as a historic resource in CRHR or designation as a local landmark under the Redondo Beach Historic Ordinance (Ord. No. 2554) (refer to Section 3.4, *Cultural Resources and Tribal Cultural Resources*). Therefore, the demolition of the Beach Cities Health Center and attached maintenance building under Alternative 4 would not result in a significant impact to historic built resources under the criteria set forth in CEQA Section 15064.5b(3). Further, as described for the proposed Project, implementation of Alternative 4 would not physically damage or substantially change the existing land use or historic context of any historic structures, including the Morell House and the Queen Anne House located 0.12 miles to the north of the Project site. Therefore, potential impacts to historic structures associated with the Phase 1 preliminary site development plan would be *less than significant*, as described for the proposed Project.

Potential impacts to previously unidentified archaeological resources, human remains, and tribal cultural resources under this alternative would be less than those described for the proposed Project. Construction activities, including ground disturbing activities (e.g., excavation, trenching, grading, etc.), under Alternative 4 would still include those described for Phase 1 and of the proposed Project (refer to Section 2.5.1.6, *Construction Activities*). For example, Phase 1 would begin with the demolition of the existing surface parking lot and associated perimeter circulation road located at the northern edge of the Project site. Subsequent construction of the RCFE Building in Phase 1 would begin with a 26-foot-deep excavation for the subterranean service area and loading dock. Phase 1 construction would also include extensive trenching for installation of utilities, grading to level the site, and demolition of the Beach Cities Health Center and the attached maintenance building. However, under Alternative 4, none of the ground disturbing activities described for the Phase 2 development program would occur, including demolition of the existing above ground parking structure and Beach Cities Advanced Imaging Building, excavation of

approximately 11,000 cy of soil, or grading. Given the extensive previous disturbance at and in the immediate vicinity of the Project site, the Project site is unlikely to contain any intact, previously undisturbed archaeological resources, human remains, or tribal cultural resources (refer to Impact CUL-2 in Section 3.4, *Cultural Resources and Tribal Cultural Resources*). Similar to the proposed Project, MM CUL-1 and MM CUL-2 would also apply to this alternative during excavation and trenching activities proposed under the Phase 1 preliminary site development plan and would substantially reduce potential impacts related to inadvertent discovery of any previously unknown archaeological resources, human remains, and tribal cultural resources to *less than significant with mitigation*, as described for the proposed Project.

Energy

Construction of Alternative 4 would require the same amount of energy consumption for on-site demolition and construction activities, transport of demolition debris, soil, and construction materials, and construction worker commute trips as described for Phase 1 (refer to Section 2.5.1.6, *Construction Activities*). Electricity would be used during demolition and construction activities to provide temporary power for lighting, electronic equipment, and certain construction equipment (e.g., electric-powered hand tools and other equipment). Energy use during construction would generally not result in a substantial increase in on-site electricity consumption and would be substantially less than the ongoing energy use on-site under existing conditions at the BCHD campus. Construction-related electricity use would be temporary and negligible over the long-term. Diesel fuel would be required to power heavy construction equipment and haul trucks exporting demolition debris and soil and delivering construction materials to the Project site. However, under Alternative 4, without implementation of Phase 2, construction activities would require less diesel fuel than that required under the proposed Project. Alternative 4 would require approximately 887,767 gallons of construction fuel, or approximately 1,023,072 gallons less than what is required for construction of the proposed Project. Given that Alternative 4 would require substantially less construction fuel than the proposed Project, Alternative 4 construction fuel consumption would represent an even smaller fraction – far less than 1 percent – of the Los Angeles County's total annual fuel consumption. This alternative would not result in the wasteful consumption of energy and overall impacts related to construction of Alternative 4 would be *less than significant*.

Operation of Alternative 4 would permanently reduce electricity demand as compared to existing settings. Following buildout of the Phase 1 preliminary site development plan, annual electricity demand of the site would be approximately 1,144,345 kWh per year, or 1,233,725 kWh per year less than existing conditions. The natural gas demand for operation of Alternative 4 would increase

by 6,578 therms per year as compared to existing conditions, however, Alternative 4 would require 18,897 therms per year less than annual demand under the proposed Project. Nevertheless, Alternative 4 would still incorporate the same sustainability features as described for the proposed Project, such as the installation of photovoltaic solar panels, solar hot water systems, energy-efficient HVAC systems, high-performance insulation, and lighting systems designed with occupancy sensors and dimmers to minimize energy use as described for the proposed Project (refer to Section 2.5.1.5, *Sustainability Features*). The RCFE Building would also meet the equivalent of LEED Gold Certification and would be WELL Building Certified. The combination of energy-saving and energy-generating features demonstrates the commitment to renewable energy supplies and ensures that Alternative 4 would not use energy in a wasteful or inefficient manner and impacts would be *less than significant*, as described for the proposed Project.

As described in for *Air Quality*, without the development of the proposed Aquatics Center and with the permanent relocation of CHF off-site, Alternative 4 would eliminate the net new vehicle trips generated by the proposed Project (refer to section 3.14, *Transportation*). Therefore, the daily consumption of fuel for vehicle trips would be reduced compared to existing conditions.

Similar to the proposed Project, Alternative 4 would support the energy conservation and GHG reduction goals and policies established in the Redondo Beach General Plan, Climate Action Plan, Sustainable Development Plan, and Sustainable City Plan, as well as the Torrance General Plan and TMC. Implementation of the sustainable design features described above demonstrate the commitment of Alternative 4 to reduce overall energy demand, including the reliance on non-renewable energy supplies, as called for in the Redondo Beach General Plan, Climate Action and Adaptation Plan, Sustainable Development Plan, and Sustainable City Plan, and the Torrance General Plan and TMC.

Geology and Soils

Impacts related to geological resources and paleontological resources under Alternative 4 would be similar to those described under the proposed Project as geological impacts are generally site-specific and existing geology and soil conditions would be the same as those described for the Project site under Impact GEO-1 in Section 3.6, *Geology and Soils*. Under Alternative 4, construction activities would result in the same depth of ground disturbance (i.e., 26 feet); however, total area of ground disturbance would be slightly less than that described under the proposed Project. Under Alternative 4, a 26-foot-deep excavation near the central area of the campus and the export of approximately 30,250 cy of soil associated with the parking structure and service areas proposed under Phase 2 would not occur. As with the proposed Project,

implementation of MM GEO-1 would be required to address geologic impacts related to seismic-related ground failure and liquefaction-related dynamic settlement, drainage and soil erosion during excavation, and potential collapse of excavated slopes. Standard regulatory conditions requiring compliance with the UBC, CBC, RBMC, and TMC would address geologic hazards under this alternative. As with the proposed Project, mitigation and compliance with regulatory conditions would reduce impacts to geology and soils under Alternative 4 to *less than significant with mitigation*.

Impacts to paleontological resources would remain similar to the proposed Project (refer to Impact GEO-4 in Section 3.6, *Geology and Soils*). While the Pleistocene-aged alluvium deposits underlying the Project site have a low potential for containing paleontological resources, paleontological resources may still be present and would be protected or collected and deposited in accordance with MM GEO-2a and -2b. Therefore, potential impacts to paleontological resources would be *less than significant with mitigation*, as described for the proposed Project.

Greenhouse Gas Emissions and Climate Change

Impacts related to GHG emissions and climate change under Alternative 4 would be less than those described for the proposed Project with the elimination of construction and operation associated with the Phase 2 development program. Given that the construction activities and the proposed programs and operational activities under Alternative 4 would be the same as those described for the Phase 1 preliminary site development plan of the proposed Project, GHG emissions anticipated under Alternative 4 would be the same as those estimated for Phase 1 of the proposed Project (refer to Section 3.7, *Greenhouse Gas Emissions and Climate Change*) and *less than significant*.

Hazards and Hazardous Materials

Impacts related to hazards and hazardous materials under Alternative 4 would be similar to those described for the proposed Project under Impact HAZ-1 through Impact HAZ-5 in Section 3.8, *Hazards and Hazardous Materials*. This alternative would require similar site preparation activities, including demolition, excavation, and grading. Accordingly, this alternative would result in similar risks of exposure to hazardous materials, including potential ACM, LBP, PCBs, and mold that could be released during demolition of the Beach Cities Health Center and the attached maintenance building during implementation (refer to Impact HAZ-2 in Section 3.8, *Hazards and Hazardous Materials*). Additionally, as described for the proposed Project, Alternative 4 would provide a subterranean service area and loading dock creating the potential for exposure to contaminated soils (i.e., PCE, benzene, and chloroform). MM HAZ-1, MM HAZ-2a through -2d, and MM HAZ-3 would require hazardous materials surveys, standard protocols

following discovery of contamination, soils management plan, soil vapor monitoring, and enrollment in the CalGEM's Well Review Program. Compliance with standard regulatory conditions and mitigation measures would reduce impacts to *less than significant with mitigation*, as described for the proposed Project. However, Alternative 4 would not include any additional excavation and grading associated with the parking structure proposed under Phase 2. Therefore, the potential for exposure to contaminated soils during Phase 2 would be slightly reduced compared to the proposed Project.

Hydrology and Water Quality

Construction

Impacts related to hydrology and water quality under Alternative 4 would be less than those described for the proposed Project with the elimination of the construction activities associated with the Phase 2 development program. Impacts to hydrology and water quality would be the same as those described for the Phase 1 preliminary site development plan of the proposed Project (refer to Section 3.9, *Hydrology and Water Quality*) and *less than significant*.

Similar to the proposed Project, Alternative 5 would include excavation to a maximum depth of 26 feet bgs for the subterranean service area and loading dock of the RCFE Building during Phase 1 preliminary site development as well as the subterranean levels of the proposed parking structure depending upon the Phase 2 development program option. Therefore, construction impacts to groundwater levels under Alternative 5 would be *less than significant*, as described for the proposed Project.

Operation

As described for the proposed Project, implementation of Alternative 4 would improve water quality and groundwater recharge from the existing setting by reducing the volume of runoff, reducing impervious surface area and improving infiltration at the Project site. However, the implementation of Alternative 4 would leave the BCHD campus with slightly more active green space, landscaping, and grass-crete (refer to Figure 5-1) than the proposed Project, which would result in the development of additional impervious surfaces during Phase 2. As such, Alternative 4 would result in a net reduction in the total amount of impervious surface area compared to the proposed Project, which would reduce the potential for pollutants to become exposed during storm events. The reduction in the amount of impervious surfaces on-site and compliance with all applicable State and local regulations, such as the Redondo Beach Stormwater Management and Discharge Control Ordinance, would ensure that operational impacts to water quality would be

less than significant. Further, implementation of Alternative 4 would improve groundwater recharge at the Project site and there would be *no impact* to groundwater quality as a result of Alternative 4.

Additionally, as described for the proposed Project in Impact HYD-3, Phase 1 of Alternative 4 would involve the construction of an on-site infiltration system designed to retain, treat, and infiltrate the 85th percentile storm into the groundwater. Any flows larger than the design storm would be conveyed to North Prospect Avenue, where it would be conveyed through the curb and gutter to the nearest catch basin maintained by the City of Redondo Beach. These facilities have excess capacity and would continue to adequately serve the Project site with the implementation of Alternative 4. Additionally, given the reduction in impervious surface area relative to the proposed Project, Alternative 4 would reduce surface water flows and would have a *less than significant* impact on drainage capacity in the vicinity of the Project site.

As with the proposed Project, Alternative 4 would not conflict with implementation of any water quality control plans or sustainable groundwater management plans (i.e., the Ocean Plan, Basin Plan, GBMP, and 2015 UWMP) and impacts would be *less than significant*.

Land Use and Planning

Alternative 4 would be implemented with the alternative access and circulation design described in Alternative 3, with a right-turn access from Beryl Street and no vehicle entry/exit onto Flagler Lane. Implementation of the alternative access and circulation design would remove vehicle access from Flagler Lane within Torrance and therefore, would be consistent with TMC Section 92.30.8. This would also remove the need for a grading or building permit from the City of Torrance. (Landscape plan approval would still be required for the proposed landscaping within the City of Torrance right-of-way.) Alternative 4 would be consistent with all other applicable land use plans, policies, and regulations. Therefore, impacts to land use and planning under Alternative 4 would be *less than significant*.

Noise

Construction

Under Alternative 4, the construction-related noise impacts described under 29-month duration of Phase 1 would be the same as those described for the proposed Project (refer to Impact NOI-1 in Section 3.11, *Noise*). However, Alternative 4 would eliminate construction noise and vibration impacts associated with the 28-month Phase 2 development program described for the proposed Project. Compliance with existing local noise regulations along with the implementation of MM

NOI-1, which would require preparation and implementation of a Construction Noise Management Plan, would reduce potential noise impacts. While the duration of construction noise would be reduced, noise levels would exceed FTA thresholds, and *significant and unavoidable* noise impacts would occur through implementation of proposed construction. Vibration levels from construction equipment and haul trips associated with BCHD development remain *less than significant* as described for the proposed Project.

Operational

As previously described, Alternative 4 would be implemented with the alternative access and circulation design described in Alternative 3, with a right-turn access from Beryl Street and no vehicle entry/exit onto Flagler Lane. Under Alternative 4, the less than significant impacts related to operational vehicle noise would be further reduced as compared to the proposed Project (refer to Impact NOI-3 in Section 3.11, *Noise*).

Because the existing parking structure at 512 North Prospect Avenue would remain in place, Alternative 4 would also eliminate noise impacts (e.g., engine idling, car alarms, screeching tires) associated with operation of the proposed 8.5-level parking structure in the Phase 2 development program of the proposed Project. Additionally, long-term operational outdoor noise impacts would likely be reduced given that the lack of the Wellness Pavilion, Aquatics Center, and CHF may reduce some of the programming involving amplified noise (e.g., outdoor fitness classes). Therefore, impacts related to operational noise under Alternative 4 would be slightly reduced compared to the proposed Project.

Population and Housing

Impacts related to population and housing under Alternative 4 would be slightly reduced as compared to those described for the proposed Project under Impact PH-1 in Section 3.12, *Population and Housing*. As described for the proposed Project, Alternative 4 would provide 157 Assisted Living units and 60 replacement Memory Care units for a total of 217 residential units, creating a negligible increase in local population. The estimate increase in population would be minor and consistent with and well within SCAG's growth projections. Given that Alternative 4 would remove most of uses associated with the Beach Cities Health Center and would not any of the uses described under the Phase 2 development program for the proposed Project, Alternative 4 is not expected to result in an increase in employment on-site. Therefore, employment under Alternative 4 would remain similar to existing conditions and would be reduced as compared to the proposed Project. Further, it is expected that most of Project employees would live in surrounding nearby cities and commute to Redondo Beach, as described for the proposed Project.

This impact would be *less than significant* because there is sufficient regional housing availability to meet these demands.

Public Services

Under Alternative 4, impacts to demand for fire protection and EMS provided by RBFD as well as police protection services provided by RBPD would remain similar to those described for the proposed Project under Impact PS-1 through Impact PS-2. The increase in residents would be the same as that described under the proposed Project; however, Alternative 4 would result in fewer employees and a substantial reduction in visitors to the BCHD campus than described under the proposed Project. Therefore, Alternative 4 would slight reduce the demand for fire protection and EMS services provided by the RBFD as well as other non-emergency services as compared to existing conditions at the Project site. Therefore, Alternative 4 would not result in substantial adverse physical impacts associated with the provision of new or physically governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, and impacts under Alternative 4 would be *less than significant*.

Transportation

Construction Traffic

Under Alternative 4, construction-related transportation impacts described under 29-month duration of Phase 1 would be the same as those described for the proposed Project. However, Alternative 4 would eliminate construction-related impacts associated with the 28-month Phase 2 development program described for the proposed Project.

Construction activities associated with Alternative 4 would result in approximately 5,927 haul truck trips during the 29-month Phase 1 construction period. Increased construction traffic on freeways and streets, particularly large haul trucks and other heavy equipment (e.g., cement trucks and cranes),

The CHF is anticipated to be the largest contributor to vehicle trips to the Project site. However, under Alternative 4, relocation of the CHF off-site would be permanent and the Health and Wellness Pavilion and Aquatics Center proposed under the Project would not be constructed. As such, Alternative 4 would not create a new demand for parking space and traffic impacts would be substantially reduced under Alternative 4.

may disrupt traffic flows, reduce lane capacities, and generally slow traffic movement. In addition, such traffic could interfere with or delay transit operations and disrupt bicycle and pedestrian circulation, particularly on North Prospect Avenue and Beryl Street (refer to Impact T-3 in Section 3.14, *Transportation*). However, as described for the proposed Project, the implementation of MM T-2 would reduce impacts related to construction traffic and public safety during Phase 1 by requiring the preparation of a Construction Traffic and Access Management Plan.

Operational Traffic

Alternative 4 would be implemented with the alternative access and circulation design described in Alternative 3, with a right-turn access from Beryl Street and no vehicle entry/exit onto Flagler Lane. The alternative access and circulation design would reconfigure the one-way driveway included in Phase 1 of the proposed Project to address concerns raised by the City of Torrance and the Torrance neighborhood residents related to vehicle access along Flagler Lane. Potential impacts associated with this alternative access and circulation design are described in detail for Alternative 3.

Given that Alternative 4 development would be limited to the Phase 1 preliminary site development plan, operational vehicle trips and VMT would be limited to those described for Phase 1 of the proposed Project. For example, Alternative 4 operations would reduce existing trip generation by approximately 1,919 daily vehicle trips as described for implementation of the Phase 1 preliminary site development plan (refer to Section 3.14, *Transportation*). While not required to mitigate a significant impact, implementation of recommended MM T-1 would include preparation and implementation of a comprehensive TDM plan, which would provide trip reduction strategies for BCHD employees, tenants, and campus visitors, as described for the proposed Project.

Utilities and Service Systems

Water Infrastructure and Supply

As previously described, construction activities under Alternative 4 would be the same as those described for Phase 1 and eliminate all construction activities described under Phase 2 of the proposed Project (refer to Section 2.5.1.6, *Construction Activities* and Section 2.5.2.4, *Construction Activities*). As such, construction-related impacts to water infrastructure and supply under Alternative 4 would also be the same as those described for Phase 1 of the proposed Project (refer to Section 3.15.1, *Water Infrastructure and Supply*).

As described for the proposed Project, the existing water flow and pressure at the Project site would be adequate to serve the development under Alternative 4 in accordance with Appendix B

of the 2016 California Fire Code (John Labib & Associates 2020). Cal Water provided a will serve letter to BCHD on November 12, 2019 indicating that after all of the required permits are obtained, Cal Water will provide water service in accordance with the rules and regulations of the CPUC (Cal Water 2019). Given that under Alternative 4 the CHF and Aquatics Center proposed under the Phase 2 development program would not be developed, net water use would be reduced under Alternative 4 (see Table 5.5-3), and would be adequately served by Cal Water's existing water entitlements. Therefore, Alternative 4 would be consistent with local policies and operational impacts on potable water use would be *less than significant,* as described for the proposed Project.

Table 5.5-3. Estimated Project Site Water Demand Comparison for Existing, Alternative 4, and Proposed Project Conditions

	Water Demand (gal/year)	Wastewater Generation (gpd)	Solid Waste Generation (tons/year)
Existing Project Site	39,231,667	68,925	330.22
Phase 1 Preliminary Site Development Plan Only Alternative	45,822,139	62,606	466.27
Proposed Project	56,426,355	116,286	660.51

Wastewater Collection, Conveyance, and Treatment

As described earlier, construction-related impacts to wastewater infrastructure under Alternative 4 would also be the same as those described for Phase 1 (refer to Section 3.15.2, *Wastewater Collection, Conveyance, and Treatment*). Given that Alternative 4 would not include the Phase 2 development program described for the proposed Project, operation of Alternative 4 would generate substantially less wastewater than the proposed Project. Therefore, implementation of Alternative 4 would result in a *less than significant* impact on existing wastewater infrastructure.

Solid Waste Management Services

Similar to the proposed Project, Alternative 4 would be required to comply with the Redondo Beach Construction and Demolition Ordinance, including submittal of a waste management plan that would divert at least 50 percent of materials generated during C&D from landfills. The C&D waste would be delivered to certified C&D waste processors within the region where it would be recycled, as feasible. Given that Alternative 4 would not demolish the existing parking structure located at 512 North Prospect Avenue and would not develop the parking structure and other uses associated with the Phase 2 development program (i.e., Wellness Pavilion, Aquatics Center, and CHF), the solid waste associated with Alternative 4 would remain well below that described for the proposed Project and *less than significant*.

Relationship of Alternative to Project Objectives

By vacating and demolishing the Beach Cities Health Center in Phase 1, Alternative 4 would eliminate the seismic safety and other hazards of this building (Project Objective 1). Development of the 157 Assisted Living units and 60 replacement Memory Care units in Phase 1 and continued operation of the Providence Little Company of Mary Medical Institute Building would generate sufficient revenue to support BCHD's current level of programs and services as well as address future community health needs (Project Objectives 2 and 6). Additionally, the campus would provide Assisted Living and Memory Care facilities with intergenerational programs and shared gathering spaces to integrate the housing with the broader community (Project Objective 4). Alternative 4 may implement the new vehicle entrance and northern perimeter road described under Alterative 2 and 4, eliminating the backyard garden lounge private open space dedicated for Assisted Living and Memory Care residents. Following demolition of the existing Beach Cities Health Center, the interior of the Project site would be converted to open space that would be sufficiently large to accommodate programs that meet community health needs and provide a meeting space for public gatherings and interactive education such as outdoor fitness classes and health fair expositions (Project Objectives 3). While the public open space proposed for the interior of the Project site would be able to accommodate programs that meet community health needs and provide a meeting space for public gatherings and interactive education (Project Objectives 3 and 5). While the RCFE Building would support PACE, Community Services, and the Youth Wellness Center, the community health and wellness benefits supported by the Wellness Pavilion and Aquatics Center would not be provided under this alternative. As such, the Assisted Living residents and PACE participants would not be able to enjoy special programming (e.g., aquatic aerobics and use of the heated therapy pool). Further, the CHF would be permanently relocated off-site, precluding programming for Assisted Living and Memory Care residents as well as PACE participants. Without these programs and services, this alternative's ability to create a modern campus designed to meet the future health needs of residents (Project Objective 5), or address growing future community health needs (Project Objective 6) would be limited. Therefore, Alternative 4 would not meet Project Objectives 5 and 6 to the same extent as the proposed Project.

5.5.5 Alternative 5 – Relocate CHF Permanently and Reduced Parking Structure

Alternative 5 would include development of the RCFE Building including the 157 new Assisted Living units and 60 replacement Memory Care units as well as the PACE, Community Services, and Youth Wellness Center described under Section 2.5.1, *Phase 1 Preliminary Site Development Plan*. Following the development of the RCFE Building, demolition of the Beach Cities Health Center would also occur as described for the proposed Project. The maximum roof height of the

RCFE Building would be the same as for the proposed Project (i.e., approximately 103 feet above the campus ground level and 133.5 feet above the vacant Flagler Lot below). Given the potential inconsistency of the proposed Project with the TMC Section 92.30.8 and the City of Torrance's ongoing consideration of the removal of the southbound movement along Flagler Lane, this alternative would also include the alternative access and circulation design described in Alternative 3, with a right-turn access from Beryl Street and no vehicle entry/exit onto Flagler Lane. Similar to Alternative 3, the alternative access and circulation design under this alternative would allow for step backs on each floor of the RCFE Building fronting Beryl Street. As such, this northern portion of the RCFE Building would incrementally decrease in floor area with each successive level, creating terraces that face Beryl Street and setting back the building façade to minimize the effect of the RCFE Building's perceived height from the pedestrian perspective at street level.

Similar to the Phase 2 development program described for the proposed Project, Phase 2 of this alternative would begin with the demolition of the parking structure located at 512 North Prospect Avenue. Additionally, Phase 2 may also include the demolition of the Beach Cities Advanced Imaging Building and redevelopment with a 3-story, 50,000-sf, purpose-built medical office building, which would rise to a height of 45 feet, with a small parapet extending to 55 feet (refer to Section 2.5.2.3, *Example Site Plan Scenarios*). Additionally, this alternative would include the construction of a single building or multiple buildings supporting a 37,150-sf Wellness Pavilion and a 31,300-sf Aquatics Center. However, under this alternative, the CHF, which would be relocated prior to the beginning of construction activities during Phase 1, would remain off-site permanently and would not be relocated to the Project site. By eliminating one of the greatest contributors to parking demand from the Project site, Alternative 5 would substantially reduce the number of parking spaces required on-site during Phase 2 and the parking garage could be reduced by approximately 200 spaces. This would result in a total height reduction of approximately 2 levels, or 30 feet.

Phase 1 construction activities under Alternative 5 would be the same as those described under Section 2.5.1.6, *Construction Activities* of this EIR. Phase 2 construction activities under Alternative 5 would be similar to those described for the proposed Project under Section 2.5.2.4, *Construction Activities*, but could be reduced in duration by between 4 to 6 months due to the elimination of the 20,000-sf CHF. Additionally, this alternative would eliminate the need for between 140 and 184 concrete truck trips as well as between 15 to 18 construction material (i.e., steel) delivery trips. With the exception of the CHF, which would remain off-site permanently, operational activities under Alternative 5 would be similar to those described for Phase 1 and Phase 2 of the proposed Project.

Aesthetics and Visual Resources

Under Phase 1 of Alternative 5, impacts to aesthetics and visual resources would be similar, but slightly reduced compared to those described for the proposed Project. For example, the maximum roof height of the RCFE Building in Phase 1 would remain at 103 feet above the campus ground level and 133.5 feet above the vacant Flagler Lot below as described for the proposed Project. However, the reconfiguration of the one-way vehicle driveway and pick-up/drop-off zone would allow for PACE to occupy the entire ground floor of the RCFE Building. As such, this alternative would allow for step backs on each floor of the RCFE Building fronting Beryl Street. With this design change, the northern portion of the RCFE Building would incrementally decrease in floor area with each successive level, creating terraces that face Beryl Street and setting back the building façade to minimize the effect of the RCFE Building's perceived height from the pedestrian perspective at street level. However, given that the maximum roof height of the RCFE Building would remain as described for the proposed Project, Alternative 5 would result in potentially significant impacts related to interruption of views of the ridgeline of the Palos Verdes hills from the highpoint at 190th Street & Flagler Street (i.e., Representative View 6). As described for the proposed Project, MM VIS-1 would require a reduction in the height of the RCFE Building such that it would no longer interrupt the ridgeline of the Palos Verdes hills. Therefore, impacts to this scenic vista would be *less than significant with mitigation*.

Under Alternative 5, the CHF would be permanently relocated off-site prior to the beginning of construction activities during Phase 1, thereby eliminating one of the greatest contributors to parking demand from the Project site. As such, Alternative 5 would substantially reduce the number of parking spaces required on-site during Phase 2 and the proposed parking garage could be reduced by approximately 200 spaces. This would result in a total height reduction of approximately 2 levels, or 30 feet. As with the proposed Project, the proposed development would meet the development standards described in Redondo Beach General Plan, zoning ordinance, and municipal code. Additionally, Planning Commission Design Review would ensure that the height and design of Alternative 5 would not degrade visual character and would ensure that light and views of the clear sky are adequately maintained. Therefore, similar to the proposed Project, Alternative 5 impacts to existing visual character and quality of the site and surrounding areas would be *less than significant*.

Since Alternative 5 would also implement the alternative access and circulation design described under Alternative 3, this alternative could remove the one-way driveway and pick-up/drop-off zone exit onto Flagler Lane and the service area and loading dock entry/exit onto Flagler Lane as described under the proposed Project. Rather than exit onto Flagler Lane, the proposed one-way

driveway under Alternative 5 would lead to a new, paved, internal access road that follows the northern perimeter of the Project site. Therefore, Alternative 5 would further reduce impacts from vehicle headlights shining towards the Torrance neighborhood east of Flagler Lane. Impacts related to substantial new sources of light and glare from development under Alternative 5 would be incrementally reduced compared to those described for the proposed Project and *less than significant*.

Given that the maximum roof heights of the proposed RCFE under Alternative 5 would remain the same as for the proposed Project, impacts to shade and shadow would remain similar. The step backs on the proposed RCFE Building may incrementally reduce shading on the Torrance neighborhood to the east of the Project, Towers Elementary School, and the multi-family residences north of Beryl Street. Shading associated with the Phase 2 development program would vary depending on the development program option selected (refer to Section 2.5.2.3 *Development Options*). However, the reduced height of the parking structure under Alternative 5 would also incrementally reduce shading during Phase 2. As with the proposed Project, the implementation of the Phase 1 preliminary site development plan and the Phase 2 development program under this alternative would slightly increase existing shading on Torrance neighborhood to the east as compared to shadows from the existing Beach Cities Health Center and parking structure; however, this shading would occur only in the evenings (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, impacts to shading from Alternative 5 would be *less than significant* as described for the proposed Project.

Air Quality

Construction Emissions

Construction activities under Alternative 5 would be the same as those described for Phase 1 of the proposed Project (refer to Section 2.5.1.6, *Construction Activities*). However, the elimination of the 20,000 sf CHF and proposed under the Phase 2 development program would reduce the Phase 2 construction period by 4 to 6 months (refer to Section 2.5.2.4, *Construction Activities*). As such, under Alternative 5, construction-related impacts to air quality would be the same as those described for Phase 1 and slightly reduced from those described under Phase 2 of the proposed Project (refer to Section 3.2, *Air Quality*). Peak daily construction emissions would remain below the SCAQMD thresholds of significance as described for the proposed Project. Similar to the proposed Project, on-site construction emissions would exceed LSTs for PM_{10} and $PM_{2.5}$; however, implementation of MM AQ-1 would require watering of exposed surfaces three times daily and prohibiting demolition when wind speed is greater than 25 mph, reduce on-site

construction emissions for PM_{10} and $PM_{2.5}$ below the SCAQMD LSTs (refer to Impact AQ-2 in Section 3.2, *Air Quality*). Therefore, with implementation of MM AQ-1, impacts with regard to localized construction emissions would be less than *significant with mitigation*. As described for the proposed Project, the use of USEPA Tier 4 engines on all construction equipment (except crushing equipment) would reduce DPM emissions from combustion by 79 to 94 percent. With the use of Tier 4 engines, DPM emissions anticipated during Phase 2 construction of Alternative 5 would not exceed SCAQMD thresholds for cancer risk (refer to Impact AQ-2 in Section 3.2, *Air Quality*). Therefore, construction-related impacts to air quality under Alternative 5 would be *less than significant with mitigation*, as described for the proposed Project.

Operational Emissions

Phase 1 operational activities associated with Alternative 5 would be the same as those described for Phase 1 of the proposed Project. Therefore, peak daily operational emissions associated with Phase 1 of this alternative would be the same as those described for the proposed Project under Impact AQ-4 in Section 3.2, *Air Quality*.

Given that the CHF would be permanently relocated off-site under Alternative 5, peak daily operational emissions associated with building operations and VMT generation would be slightly reduced relative to Phase 2 of the proposed Project. Since the CHF is projected to generate the majority of trips and VMT under the proposed Project, Alternative 5 would substantially reduce daily vehicle trips and VMT-related emissions as compared to the proposed Project. As such, implementation of Alternative 5 would likely result in reduced CO levels at nearby intersections, and would not exceed CO thresholds as compared to existing conditions. Similar to the Project, increases in CO emissions associated with this alternative would not cause an exceedance of the Federal or State CO standards and CO hotspot impacts would be *less than significant*.

As described in Section 3.2, *Air Quality*, operation air emissions would continue to be below the SCAQMD mass daily thresholds and LSTs for all air pollutants. Additionally, operation of proposed development under Alternative 5 would not release substantial amounts of TACs, and future residents or visitors of the Project site would not be adversely affected by TAC emissions originating from offsite. Therefore, under Alternative 5, operational air pollutant emissions would be reduced as compared to the proposed Project, and would be *less than significant*.

Additionally, this alternative would include the same uses as the proposed Project and, as such, would also not result in objectionable odor impacts, similar to the proposed Project. Therefore, impacts related to odors under Alternative 5 would be *less than significant*, as described for the proposed Project.

Biological Resources

Construction activities under Alternative 5 would be the same as those described for the Phase 1 preliminary site development plan under Section 2.5.1.6, *Construction Activities*. Construction activities would be similar to those described for Phase 2, but could be reduced in duration by between 4 to 6 months due to the elimination of the 20,000-sf CHF. Nevertheless, implementation of the Phase 2 development program would still require the removal of landscaped trees and shrubs within the interior of the existing BCHD campus. As described for the proposed Project, all vegetation removal would occur in compliance with the MBTA and California Fish and Game Code, and vegetation removal within the jurisdiction of the City of Torrance would be subject to compliance with City of Torrance policies, including Policy CR.18.1 of the Torrance General Plan which encourages planting of new trees. Implementation of MM BIO-1 would require that construction activities not disturb active nests during the nesting bird season (i.e., between February 15 and August 31). As described for the proposed Project, BCHD would submit and implement landscape plans that comply with RBMC Section 10-5.1900 (Landscaping Regulations) prior to the initiation of demolition and construction activities for Phase 1 and Phase 2 of Alternative 5. The proposed landscaping, with its emphasis on native trees, would provide enhanced roosting or nesting habitat for resident and migratory birds, including Cooper's hawk. Therefore, long-term impacts to resident and migratory birds protected under the MBTA and California Fish and Game Code would be *less than significant*, as described for the proposed Project.

Cultural Resources and Tribal Cultural Resources

Implementation of Alternative 5 would result in the same impacts to historical resources as described for the proposed Project. Additionally, potential impacts to previously unidentified archaeological resources, human remains, and tribal cultural resources under this alternative would also be similar to those under the proposed Project. Given the extensive previous disturbance at and in the immediate vicinity of the Project site, the Project site is unlikely to contain any intact, previously undisturbed archaeological resources, human remains, or tribal cultural resources (refer to Impact CUL-2 in Section 3.4, *Cultural Resources and Tribal Cultural Resources*). Similar to the proposed Project, MM CUL-1 and MM CUL-2 would also apply to this alternative and would substantially reduce potential impacts related to inadvertent discovery of any previously unknown archaeological resources, human remains, and tribal cultural resources to *less than significant with mitigation*.

Energy

Construction

Construction and operational activities under Alternative 5 would be the same as those described for Phase 1 of the proposed Project but slightly reduced under Phase 2 with the elimination of the 20,000 sf CHF. As such, Phase 1 construction of Alternative 5 would require the same amount of energy consumption for on-site demolition and construction activities, transport of demolition debris, soil, and construction materials, and construction worker commute trips as described for Phase 1 (refer to Section 2.5.1.6, *Construction Activities*). Electricity would be used during demolition and construction activities to provide temporary power for lighting, electronic equipment, and certain construction equipment (e.g., electric-powered hand tools and other equipment). Construction-related electricity use would be temporary and negligible over the long-term. Diesel fuel would be required to power heavy construction equipment and haul trucks exporting demolition debris and soil and delivering construction materials to the Project site. However, with the elimination of the 20,000 sf CHF proposed under the Phase 2 development program, construction energy consumption would be slightly reduced from those described for the proposed Project. Overall energy impacts related to construction of Alternative 5 would be *less than significant*, as described for the proposed Project.

Operation

Operational activities under Alternative 5 would decrease electricity demand following buildout of the Phase 1 preliminary site development plan and permanently increase the electricity demand following buildout of the Phase 2 development program as compared to existing conditions. However, because Alternative 5 would involve the permanent relocation of CHF off-site and would not include construction of a new 20,000-sf CHF building, the operational electricity consumption of Alternative 5 would be slightly reduced as compared to the proposed Project. Similarly, the natural gas demand for operation of Alternative 5 would increase from existing conditions but would be slightly reduced as compared to the proposed Project. Alternative 5 would incorporate the same sustainability features as described for the proposed Project, such as the installation of photovoltaic solar panels, solar hot water systems, and energy-efficient HVAC systems, high-performance insulation, and lighting systems designed with occupancy sensors and dimmers to minimize energy use as described for the proposed Project (refer to Section 2.5.1.5, *Sustainability Features*). New buildings would also meet the equivalent of LEED Gold Certification and would be WELL Building Certified. The combination of energy-saving and energy-generating features demonstrates the commitment of Alternative 5 to renewable energy

supplies and ensures that Alternative 5 would not use energy in a wasteful or inefficient manner. Similar to the proposed Project, Alternative 5 would support the energy conservation and GHG reduction goals and policies established in Redondo Beach General Plan, Climate Action Plan, Sustainable Development Plan, and Sustainable City Plan, as well as Torrance General Plan and TMC. Implementation of the sustainable design features described above demonstrate the commitment of Alternative 5 to reduce overall energy demand, including the reliance on non-renewable energy supplies, as called for in the Redondo Beach General Plan, Climate Action and Adaptation Plan, Sustainable Development Plan, and Sustainable City Plan, and the Torrance General Plan and TMC.

Geology and Soils

Impacts related to geological resources and paleontological resources under Alternative 5 would remain similar to those described under the proposed Project as geological impacts are generally site-specific and existing geology and soil conditions would be the same as those described for the Project site under Impact GEO-1 in Section 3.6, *Geology and Soils*. As with the proposed Project, implementation of MM GEO-1 would be required to address geologic impacts related to seismic-related ground failure and liquefaction-related dynamic settlement, drainage and soil erosion during excavation, and potential collapse of excavated slopes. Standard regulatory conditions requiring compliance with the UBC, CBC, RBMC, and TMC would address geologic hazards under this alternative. Additionally, given that this alternative would result in the same depth of ground disturbance, as the proposed Project, impacts to paleontological resources would remain similar (refer to Impact GEO-4 in Section 3.6, *Geology and Soils*). While the Pleistocene-aged alluvium deposits underlying the Project site have a low potential for containing paleontological resources, paleontological resources may still be present and would be protected or collected and deposited in accordance with MM GEO-2a and -2b. Therefore, potential impacts to paleontological resources would be *less than significant with mitigation*, as described for the proposed Project.

Greenhouse Gas Emissions and Climate Change

Construction activities and the proposed programs and operational activities under Alternative 5 would remain similar to those described for Phase 1. However, because duration of Phase 2 construction activities would be reduced by 4 to 6 months due to elimination of the 20,000-sf CHF, GHG related emissions during construction and operational activities under Alternative 5 would be slightly less than those described for Phase 2 of the proposed Project. Further, since this alternative would include the same uses and sustainability features as the proposed Project, impacts

related to conflicts with plans and policies related to reduction in GHG emissions would be the same as those identified in Impact GHG-1 for the proposed Project and would be *less than significant*, as described for the proposed Project.

Hazards and Hazardous Materials

Impacts related to hazards and hazardous materials under Alternative 5 would be similar to those described for the proposed Project under Impact HAZ-1 through Impact HAZ-5 in Section 3.8, *Hazards and Hazardous Materials*. This alternative would require similar site preparation activities, including demolition and excavation. Accordingly, this alternative would result in similar risks of exposure to hazardous materials, including potential ACM, LBP, PCBs, and mold that could be released during demolition of the Beach Cities Health Center and the attached maintenance building during implementation of the Phase 1 preliminary site development plan and demolition of above ground parking garage and potentially the Beach Cities Advanced Imaging Building during implementation of the Phase 2 development program (refer to Impact HAZ-2 in Section 3.8, *Hazards and Hazardous Materials*). As described for the proposed Project, Alternative 5 would provide a subterranean service area and loading dock below the proposed RCFE Building in Phase 1 as well as the potential for subterranean parking levels and service areas depending upon the Phase 2 development program option. As such, the area of excavation and trenching would be similar to the proposed Project. Therefore, the potential for exposure to contaminated soils (i.e., PCE, benzene, and chloroform) would be similar (refer to Impact HAZ-2 in Section 3.8, *Hazards and Hazardous Materials*). Overall, impacts with regard to hazards and hazardous materials under this alternative would be similar to those described under the proposed Project. As such, MM HAZ-1, MM HAZ-2a through -2d, and MM HAZ-3 would require hazardous materials surveys, standard protocols following discovery of contamination, soils management plan, soil vapor monitoring, and enrollment in the CalGEM's Well Review Program. Compliance with standard regulatory conditions and mitigation measures would reduce impacts to *less than significant with mitigation*, as described for the proposed Project.

Hydrology and Water Quality

Construction

Construction activities under Alternative 5 would be the same as those described for Phase 1 (refer to Section 2.5.1.6, *Construction Activities*). Construction activities under Phase 2 would be similar to those described under the proposed Project but the duration of the construction period would be 4 to 6 months less than due to the elimination of the 20,000-sf CHF. Therefore, construction-related impacts to water quality would be *less than significant*.

Similar to the proposed Project, Alternative 5 would include excavation to a maximum depth of 26 feet bgs for the subterranean service area and loading dock of the RCFE Building during Phase 1 preliminary site development as well as the subterranean levels of the proposed parking structure depending upon the Phase 2 development program option. Therefore, construction impacts to groundwater levels under Alternative 5 would be the same as those described for the proposed Project and *less than significant*.

Operation

As described for the proposed Project, implementation of Alternative 5 would improve water quality and groundwater recharge by reducing the volume of runoff and improving infiltration at the Project site. The reduction in the amount of impervious surfaces on-site and compliance with all applicable State and local regulations would ensure that operational impacts to water quality would be *less than significant.* Further, implementation of Alternative 5 would improve groundwater recharge at the Project site and as described for the proposed Project there would be *no impact* to groundwater quality as a result of Alternative 5.

Additionally, as described for the proposed Project in Impact HYD-3, Phase 1 of Alternative 5 would involve the construction of an on-site infiltration system designed to retain, treat, and infiltrate the 85th percentile storm into the groundwater. The existing storm drain infrastructure discharging to the City of Torrance municipal storm drain system at the storm drain line beneath Flagler Lane would be abandoned in place. Any flows larger than the design storm would be conveyed to North Prospect Avenue, where it would be conveyed through the curb and gutter to the nearest catch basin maintained by the City of Redondo Beach. These facilities have excess capacity and would continue to adequately serve the Project site with the implementation of Alternative 5. Therefore, similar to the proposed Project, Alternative 5 would have a *less than significant* impact on drainage capacity in the vicinity of the Project site.

As with the proposed Project, Alternative 5 would not conflict with implementation of any water quality control plans or sustainable groundwater management plans (i.e., the Ocean Plan, Basin Plan, GBMP, and 2015 UWMP) and impacts would be *less than significant*.

Land Use and Planning

Alternative 5 would be implemented with the alternative access and circulation design described in Alternative 3, with a right-turn access from Beryl Street and no vehicle entry/exit onto Flagler Lane. Implementation of the alternative access and circulation design would remove vehicle access from Flagler Lane within Torrance and therefore, would be consistent with TMC Section 92.30.8.

This would also remove the need for a grading or building permit from the City of Torrance. (Landscape plan approval would still be required for the proposed landscaping within the City of Torrance right-of-way.) Alternative 5 would be consistent with all other applicable land use plans, policies, and regulations. Therefore, impacts to land use and planning under Alternative 5 would be *less than significant*.

Noise

Construction

Under Alternative 5, the construction-related noise impacts would be similar to those described for the proposed Project. However, since Alternative 5 would not include the construction of the 20,000-sf CHF, the Phase 2 construction period and associated noise impacts would be reduced by approximately 4 to 6 months. Nevertheless, the proposed building(s) under the Phase 2 development program would be up to 71.5 feet above the campus ground level and 101.5 feet above the vacant Flagler Lot below. Therefore, as described for the proposed Project, construction activities would produce increased noise levels that would impact surrounding noise-sensitive receptors, as the necessary noise barrier heights required to mitigate the construction noise are considered infeasible (refer to Impact NOI-1 in Section 3.11, *Noise*). Compliance with existing local noise regulations along with the implementation of MM NOI-1, which would require preparation and implementation of a Construction Noise Management Plan, would reduce potential noise impacts. However, *significant and unavoidable* noise impacts would occur throughout the proposed construction. Vibration levels from construction equipment and haul trips associated with BCHD development remain *less than significant* as described for the proposed Project.

Operation

As described earlier, Alternative 5 would be implemented with the alternative access and circulation design described in Alternative 3, with a right-turn access from Beryl Street and no vehicle entry/exit onto Flagler Lane. Under Alternative 5, impacts related to operational vehicle noise would be similar to, but incrementally reduced as compared to the proposed Project (refer to Impact NOI-3 in Section 3.11, *Noise*).

Alternatives 3, 4, 5, and 6 would implement an alternative access and circulation scheme than described in the proposed Project. The reconfigured roadways would eliminate vehicle entry on to Flagler Lane, including trash pick-up and delivery operations and other traffic related noise, thereby reducing vehicle noise levels within the adjacent Torrance neighborhood.

Because the CHF is projected to generate the majority of vehicle trips to the Project site under the proposed Project and Alternative 5 would permanently relocate the CHF off-site, Alternative 5 would reduce impacts from traffic-related noise. Alternative 5 would also reduce parking spaces developed on-site compared to the proposed Project. Additionally, long-term operational outdoor noise impacts would likely be reduced given that the lack of the CHF may reduce some of the programming involving amplified noise (e.g., outdoor fitness classes). Therefore, impacts related to operational noise under Alternative 5 would be incrementally reduced compared to the proposed Project and *less than significant with mitigation*.

Population and Housing

Impacts related to population and housing under Alternative 5 would remain similar to those described for the proposed Project under Impact PH-1 in Section 3.12, *Population and Housing*. However, increases in employment under Alternative 5 would be slightly reduced from the 170 new jobs expected under the proposed Project, since the CHF would be permanently located off-site. As described for the proposed Project, employment opportunities would likely be filled by members of the local and regional labor force. Potential increases in the low- and moderate-income work force within the Redondo Beach could incrementally increase demand for affordable housing within the City; however, it is expected that the majority of employees would live in surrounding nearby cities and commute to Redondo Beach, as described for the proposed Project. This impact would be *less than significant* as there is sufficient regional housing availability to meet these demands.

Public Services

Under Alternative 5, impacts to demand for fire protection and EMS by the RBFD as well as police protection services provided by RBPD would remain similar to those described for the proposed

Project under Impact PS-1 through Impact PS-2. Alternative 5 would result in an increase in residents, employees, and visitors at the BCHD campus, and could incrementally increase the demand for fire protection and EMS services RBFD as well as other non-emergency services as compared to existing conditions at the Project site. However, the number of employees and visitors would be slightly reduced given the removal of the 20,000-sf CHF from the Phase 2 development program. Therefore, Alternative 5 would not result in substantial adverse physical impacts associated with the provision of new or physically governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, and impacts under Alternative 5 would be *less than significant*.

Transportation

Construction Traffic

As previously described, construction activities under Alternative 5 would be the same as those described for Phase 1 and similar to those described for Phase 2 of the proposed Project, with slight reductions due to the elimination of the 20,000-sf CHF. As such, construction-related impacts on the transportation network would be the same as those described for Phase 1 but duration of Phase 2 of the proposed Project could be reduced in by 4 to 6 months due to the elimination of the 20,000-sf CHF. As with the proposed Project, construction activities associated with Alternative 5 would result in approximately 5,927 haul truck trips during the 29-month Phase 1 construction period; however, Alternative 5 would eliminate the need for between 140 and 184 concrete truck trips as well as between 15 to 18 construction material (i.e., steel) delivery trips during the Phase 2 construction period, requiring only 3,607 to 3,654 haul truck trips. Increased construction traffic on freeways and streets, particularly large haul trucks and other heavy equipment (e.g., cement trucks and cranes), may disrupt traffic flows, reduce lane capacities, and generally slow traffic movement. In addition, such traffic could interfere with or delay transit operations and disrupt bicycle and pedestrian circulation, particularly on North Prospect Avenue and Beryl Street. Implementation of MM T-2 would reduce impacts related to construction traffic and public safety by requiring the preparation of a Construction Traffic and Access Management Plan.

Operational Traffic

Alternative 5 would be implemented with the alternative access and circulation design described in Alternative 3, with a right-turn access from Beryl Street and no vehicle entry/exit onto Flagler Lane. The alternative access and circulation design would reconfigure the one-way driveway included in Phase 1 of the proposed Project to address concerns raised by the City of Torrance and the Torrance neighborhood residents related to vehicle access along Flagler Lane. Potential

impacts associated with this alternative access and circulation design are described in detail for Alternative 3.

Since the CHF is one of the primary trip generators on the existing BCHD campus, Alternative 5 would substantially reduce daily trip generation and VMT as compared to the proposed Project. Further, permanent relocation of the CHF would substantially reduce the number of parking spaces required on-site during Phase 2. While not required to mitigate a significant impact, implementation of recommended MM T-1 would include preparation and implementation of a comprehensive TDM plan, which would provide trip reduction strategies for BCHD employees, tenants, and campus visitors, as described for the proposed Project (refer to Section 3.14, *Transportation*).

Utilities and Service Systems

Water Infrastructure and Supply

As previously described, construction activities under Alternative 5 would be the same as those described for Phase 1 and Phase similar to those described 2 of the proposed Project, with slight reductions due to the elimination of the 20,000-sf CHF (refer to Section 2.5.1.6, *Construction Activities* and Section 2.5.2.4, *Construction Activities*). The construction period for the Phase 2 development program would be reduced by 4 to 6 months from the proposed Project. Therefore, construction-related impacts to water infrastructure and supply under Alternative 5 would be slightly reduced compared to those described for the proposed Project (refer to Section 3.15.1, *Water Infrastructure and Supply*).

As described for the proposed Project, the existing water flow and pressure at the Project site is adequate to serve the development under Alternative 5 in accordance with Appendix B of the 2016 California Fire Code (John Labib & Associates 2020). Cal Water provided a will serve letter to BCHD on November 12, 2019 indicating that after all of the required permits are obtained, Cal Water will provide water service in accordance with the rules and regulations of the CPUC (Cal Water 2019). As described in Section 3.15, *Utilities and Service Systems*, existing water entitlements would adequately meet water demand under the proposed Project. Because Alternative 5 would permanently relocate the CHF off-site, annual water demand would be 55,243,495 gallons, or 1,182,860 gallons less than under the proposed Project (see Table 5.5-4). As such, Alternative 5 would be adequately served by Cal Water's existing water entitlements. Additionally, Alternative 5 may also include a connection to the existing 4-inch diameter purple pipe along Diamond Street, Flagler Alley, and Flagler Lane (for recycled water), as described for the proposed Project. Recycled water could be used for landscape irrigation and architectural water

features, water for mechanical cooling towers, and water for toilet flushing in order to reduce overall water demand under Alternative 5. Therefore, Alternative 5 would be consistent with local policies and operational impacts on potable water use would be *less than significant*, as described for the proposed Project.

Table 5.5-4. Estimated Project Site Water Demand Comparison for Existing, Alternative 5, and Proposed Project Conditions

	Water Demand (gal/year)	Wastewater Generation (gpd)	Solid Waste Generation (tons/year)
Existing Project Site	39,231,667	68,925	330.22
Relocate CHF Permanently Alternative	55,243,495	100,286	600.00
Proposed Project	56,426,355	116,286	660.51

Wastewater Collection, Conveyance, and Treatment

Construction-related impacts to wastewater under Alternative 5 would be the same as those described for Phase 1 and similar to those described 2 of the proposed Project, with slight reductions due to the elimination of the 20,000-sf CHF (refer to Section 3.15.2, *Wastewater Collection, Conveyance, and Treatment*).

Given that Alternative 5 would result in 20,000 sf less building square footage as compared to the proposed Project due to the elimination of the on-site CHF, operation of Alternative 5 would generate slightly less wastewater as the proposed Project. Development proposed under the Phase 1 preliminary site development plan would incrementally decrease wastewater generation at the Project site as compared to existing conditions. Implementation of the Phase 2 development program under Alternative 5 would increase wastewater generation at the Project site as compared to Phase 1 and existing conditions but would decrease wastewater generation as compared to the proposed Project by 16,000 gpd. The Sewer Capacity Study prepared for the proposed Project concluded, after calculating the proposed sewer flow, the existing sewer lines could adequately accommodate the proposed sewer flow without upgrades. Additionally, the LACSD South Bay Cities Main Trunk Sewer has adequate remaining capacity (2.1 mgd) to convey the increase in sewage flow of 31,361 gpd (118,402.5 gpd peak flow) associated with proposed Project. Therefore, implementation of Alternative 5 would result in a *less than significant* impact on existing wastewater infrastructure, as described for the proposed Project.

Solid Waste Management Services

Similar to the proposed Project, Alternative 5 would be required to comply with the Redondo Beach Construction and Demolition Ordinance, including submittal of a waste management plan that would divert at least 50 percent of materials generated during C&D from landfills. The C&D waste would be delivered to certified C&D waste processors within the region where it would be recycled, as feasible. The solid waste associated with Alternative 5 would represent a very small percentage of the inert waste disposal capacity in the region. Therefore, as described for the proposed Project, Alternative 5 would not create a need for additional solid waste disposal facilities to adequately Project construction-generated inert waste and impacts would be *less than significant.*

Relationship of Alternative to Project Objectives

Alternative 5 would attain all of the Project Objectives. By vacating and demolishing the Beach Cities Health Center in Phase 1, Alternative 5 would eliminate the seismic safety and other hazards of this building (Project Objective 1). Development of the 157 Assisted Living units and 60 replacement Memory Care units in Phase 1 would generate sufficient revenue to support BCHD's current level of programs and services as well as address future community health needs (Project Objectives 2 and 6). As described for the proposed Project, Alternative 5 would integrate these Assisted Living facilities with the broader community through intergenerational programs and shared gathering spaces within the other public health and wellness facilities on campus, such as the Aquatics Center and Youth Wellness Center (Project Objective 4). However, since the CHF would be permanently relocated off-site under Alternative 5, this alternative would not provide benefits related to space efficiency and overlapping programs. For example, the Aquatic Center and CHF programs would not benefit from having shared locker rooms and showers on-site as for the proposed Project. Additionally, the CHF would preclude programming for Assisted Living and Memory Care residents as well as PACE participants, such as health and fitness classes specially designed for older adults and senior citizens. Nonetheless, the proposed space for PACE, Community Services, and the Youth Wellness Center included in the Phase 1 preliminary site development plan as well as the Wellness Pavilion and Aquatics Center included in the Phase 2 development program would support programs that address growing future community health needs (Project Objective 6). Redevelopment of the BCHD campus with the proposed RCFE Building in Phase 1 and proposed buildings(s) included in the Phase 2 development program would create a modern campus with facilities designed to meet the future health needs of residents (Project Objective 5). Public open space (e.g., central lawn, Main Street promenade, sensory gardens, etc.) and the new landscaping of this alternative would also be similar to that described

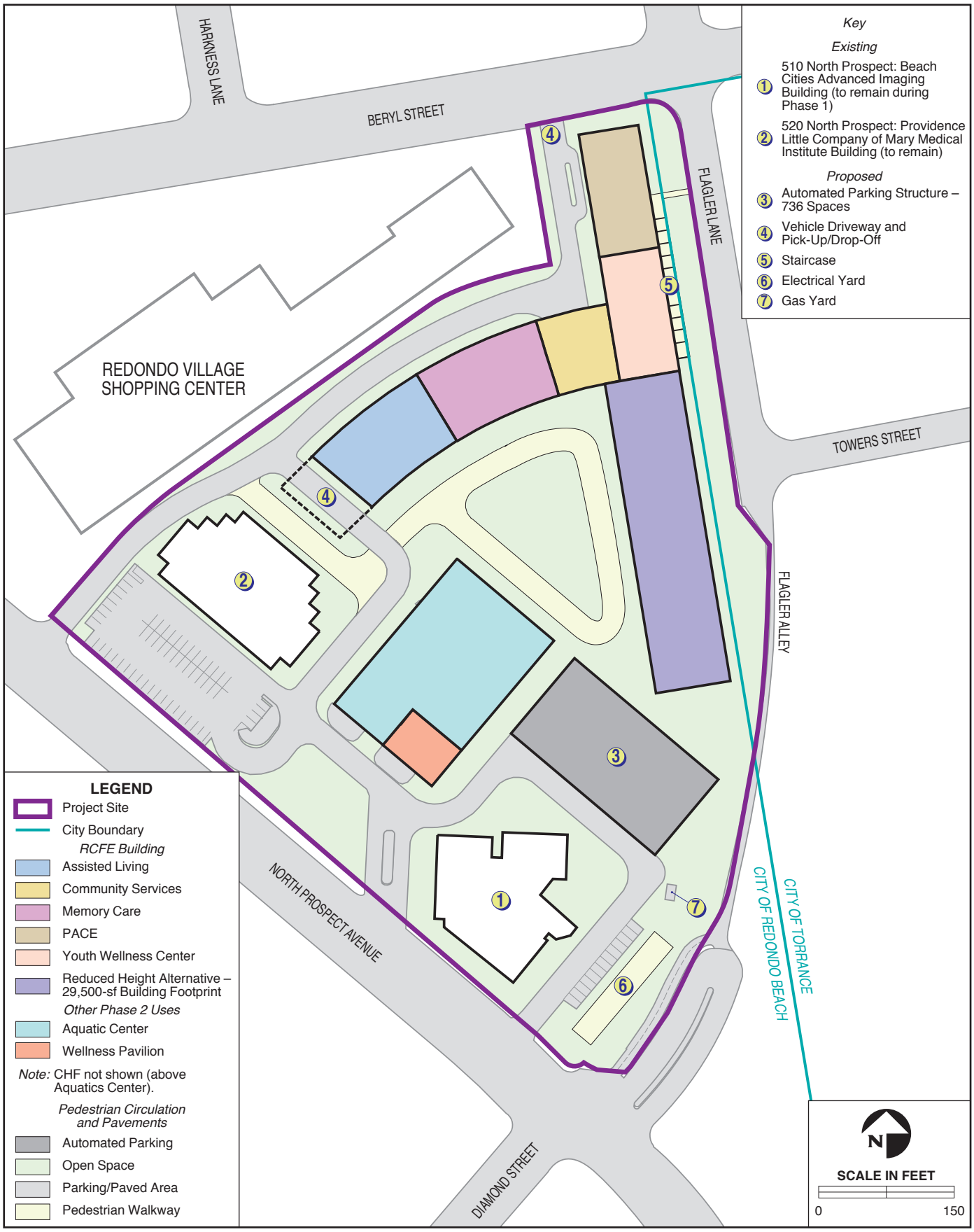
for the proposed Project. All public open space (e.g., central lawn, Main Street promenade, sensory gardens, etc.) would be developed as described for the proposed Project. The public open space proposed for the interior of the Project site would be able to accommodate programs that meet community health needs and provide a meeting space for public gatherings and interactive education (Project Objectives 3 and 5).

5.5.6 Alternative 6 – Reduced Height Alternative

As described in Section 3.1, *Aesthetics and Visual Resources*, the proposed Project would result in potentially significant impacts related to interruption of views of the ridgeline of the Palos Verdes hills from the highpoint at 190th Street & Flagler Street (i.e., Representative View 6). MM VIS-1 would require a reduction in the height of the RCFE Building such that it would no longer interrupt the ridgeline of the Palos Verdes hills. Therefore, impacts to this scenic vista would be *less than significant with mitigation*. However, the financial feasibility of implementing MM VIS-1 is not certain at this time. A reduction in floor height would remove programmable revenue-generating space in the RCFE Building. Additionally, excavation to recess the building further below the ground surface would be costly.

Under Alternative 6, approximately 88,800 sf of building space would be removed from the top 2 stories of the RCFE Building to avoid the impact to scenic vistas. However, unlike MM VIS-1, this alternative would add this space back to the RCFE Building as an addition that wraps around the eastern perimeter of the campus (see Figure 5-2). Each floor of the building addition would allow for approximately 29,500 sf; therefore, the addition to the RCFE Building would require 3 stories to replace the 88,800 sf of building square footage removed from the upper levels of the RCFE Building.

As with the proposed Project, Alternative 6 would include development of the RCFE Building including the 157 new Assisted Living units and 60 replacement Memory Care units as well as the PACE, Community Services, and Youth Wellness Center described under Section 2.5.1, *Phase 1 Preliminary Site Development Plan*. The maximum roof height of the RCFE Building would be approximately 76 feet above the campus ground level and 106.5 feet above the vacant Flagler Lot below. The addition to the RCFE Building along the eastern perimeter of the campus would rise to a height of approximately 41 feet above the campus ground level.



wood.

Reduced Height Alternative

FIGURE 5-2

Given the potential inconsistency of the proposed Project with the TMC Section 92.30.8 and the City of Torrance's ongoing consideration of the removal of the southbound movement along Flagler Lane, this alternative would also include the alternative access and circulation design described in Alternative 3, with a right-turn access from Beryl Street and no vehicle entry/exit onto Flagler Lane. Similar to Alternative 3, the alternative access and circulation design under this alternative would allow for step backs on each floor of the RCFE Building fronting Beryl Street. As such, this northern portion of the RCFE Building would incrementally decrease in floor area with each successive level, creating terraces that face Beryl Street and setting back the building façade to minimize the effect of the RCFE Building's perceived height from the pedestrian perspective at street level.

The Phase 2 development program would be the same as that described for the proposed Project. Construction activities under Alternative 6 would be similar to those described under Section 2.5.1.6, *Construction Activities* of this EIR, but would result in a greater area of ground disturbance. Construction activities under Alternative 6 would be the same as those described for Phase 2 under Section 2.5.2.4, *Construction Activities* of this EIR.

Aesthetics and Visual Resources

Under Phase 1 of Alternative 6, the maximum roof height of the RCFE Building in Phase 1 would be reduced by approximately 27 feet as compared to the proposed Project (i.e., 76 feet above the existing ground level and 106.5 feet above the vacant Flagler Lot below). As viewed from the highpoint at the intersection of 190th Street & Flagler Lane (i.e., Representative View 6), the reduced RCFE Building height under Alternative 6 would not interrupt views of the Palos Verdes hills ridgeline unlike the proposed Project. Therefore, impacts to this scenic vista would be *less than significant*, and MM VIS-1 would not be required. Additionally, given that Alternative 6 would be implemented with the alternative access and circulation design described in Alternative 3, the reconfiguration of the one-way vehicle driveway and pick-up/drop-off zone would allow for PACE to occupy the entire ground floor of the RCFE Building. As such, this alternative would allow for step backs on each floor of the RCFE Building fronting Beryl Street. With this design change, the northern portion of the RCFE Building would incrementally decrease in floor area with each successive level, creating terraces that face Beryl Street and setting back the building façade to further minimize the effect of the RCFE Building's perceived height from the pedestrian perspective at street level. These step backs would allow for more views of the open sky from the intersection of Beryl Street & Flagler Lane (i.e., Representative View 3) and would minimize potential impacts to visual character or quality as compared to the proposed Project. However, Alternative 6 would require a 3-story addition to the eastern side of the RCFE Building along the

eastern perimeter of the Project site to replace the building square footage from the upper 2 stories of the RCFE Building that would be removed to reduce the maximum roof height under this alternative. The addition to the RCFE Building along the eastern perimeter of the campus would rise to a height of approximately 41 feet above the campus ground level. As such, the building mass as viewed from Flagler Lane & Towers Street (i.e., Representative View 2) would be slightly greater as compared to the proposed Project.

Since Alternative 6 would also implement the access and circulation design described under Alternative 3, this alternative would remove the one-way driveway and pick-up/drop-off zone exit onto Flagler Lane and the service area and loading dock entry/exit onto Flagler Lane as described under the proposed Project. Rather than exit onto Flagler Lane, the proposed one-way driveway under Alternative 6 would lead to a new, paved, internal access road that follows the northern perimeter of the Project site. Therefore, Alternative 3 would eliminate vehicle traffic onto Flagler Lane and would completely eliminate the less than significant light impacts from vehicle headlights shining towards the Torrance neighborhood east of Flagler Lane.

The reduced building height and step backs on the proposed RCFE Building would reduce the total area and duration shading on the adjacent Torrance neighborhood, Towers Elementary School, and the multi-family residences north of Beryl Street as compared to the proposed Project. However, shading associated with the Phase 2 development program would be the same as those described for the proposed Project (refer to Section 3.1, *Aesthetics and Visual Resources*). As with the proposed Project, the implementation of the Phase 1 preliminary site development plan and the Phase 2 development program under this alternative would incrementally increase existing shading on Torrance neighborhood to the east as compared to shadows from the existing Beach Cities Health Center and parking structure; however, this shading would occur only in the evenings (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, impacts to shading from Alternative 5 would be *less than significant*.

Air Quality

Construction Emissions

Construction activities under Alternative 6 would remain similar to those described for Phase 1 and Phase 2 of the proposed Project (refer to Section 2.5.1.6, *Construction Activities* and Section 2.5.2.4, *Construction Activities*). However, the addition to the RCFE Building would require a greater building footprint and thus, a greater area of ground disturbance during construction. Additionally, construction activities associated with this addition would be located closer to the Torrance neighborhood to the east. As such, on-site construction-related PM_{10} and $PM_{2.5}$ emissions

would be greater than those described for the proposed Project. Similar to the proposed Project, on-site construction emissions would exceed LSTs for PM_{10} and $PM_{2.5}$; however, implementation of MM AQ-1 would require watering of exposed surfaces three times daily and prohibiting demolition when wind speed is greater than 25 mph (refer to Section 3.2, *Air Quality*). With implementation of MM AQ-1, on-site construction emissions for PM_{10} and $PM_{2.5}$ would be reduced to levels below the SCAQMD LSTs. Therefore, with implementation of MM AQ-1, impacts with regard to localized construction emissions would be less than *significant with mitigation*. Additionally, the use of USEPA Tier 4 engines on all construction equipment (except crushing equipment) would reduce DPM emissions. With the use of Tier 4 engines, DPM emissions anticipated during Phase 1 construction of Alternative 6 would not exceed SCAQMD thresholds for cancer risk (refer to Impact AQ-2 in Section 3.2, *Air Quality*). Therefore, construction-related impacts to air quality under Alternative 6 would remain similar to those described for the proposed Project and would be *less than significant with mitigation*.

Operational Emissions

The proposed programs and operational activities under Alternative 6 would be the same as those described for Phase 1 and Phase 2 of the proposed Project. Additionally, operational vehicle trips and VMT anticipated under Alternative 6 would be the same as those described for the proposed Project. Therefore, operational emissions generated by Alternative 6 (including vehicle trips, electricity and natural gas consumption, and landscaping maintenance) would be the same as those described for Phase 1 and Phase 2 of the proposed Project and *less than significant*.

As discussed in Section 3.2, *Air Quality*, the proposed Project would contribute to cumulative traffic in the area and would incrementally increase CO levels at nearby intersections, but would not exceed CO thresholds. As with the proposed Project, increases in CO emissions associated with this alternative would not cause an exceedance of the Federal or state CO standards and CO hotspot impacts would be *less than significant*.

Additionally, this alternative would include the same residential, medical office, and public health uses as the proposed Project and, as such, would also not result in objectionable odor impacts, similar to the proposed Project. Therefore, impacts related to odors under Alternative 6 would be *less than significant*, as described for the proposed Project.

Biological Resources

As previously described, construction activities under Alternative 6 would remain similar to those described for Phase 1 and Phase 2 of the proposed Project (refer to Section 2.5.1.6, *Construction*

Activities and Section 2.5.2.4, *Construction Activities*). However, construction associated with Alternative 6 would result in an increase area of ground disturbance on-site related to the addition to the eastern side of the RCFE Building. Therefore, Alternative 6 would result in the removal of additional landscaped trees, shrubs, and other ground cover as compared to the proposed Project. Nevertheless, all vegetation removal would occur in compliance with the MBTA and California Fish and Game Code, and vegetation removal within the jurisdiction of the City of Torrance would be subject to compliance with City of Torrance policies, including Policy CR.18.1 of the Torrance General Plan which encourages planting of new trees. Implementation of MM BIO-1 would require that construction activities not disturb active nests during the nesting bird season (i.e., between February 15 and August 31). As described for the proposed Project, BCHD would submit and implement landscape plans that comply with RBMC Section 10-5.1900 (Landscaping Regulations) prior to the initiation of demolition and construction activities for Phase 1 and Phase 2 of Alternative 6. The proposed landscaping, with its emphasis on native trees, would provide enhanced roosting or nesting habitat for resident and migratory birds, including Cooper's hawk. Therefore, long-term impacts to resident and migratory birds protected under the MBTA and California Fish and Game Code would be *less than significant*, as described for the proposed Project.

Cultural Resources and Tribal Cultural Resources

Implementation of Alternative 6 would result in the same *less than significant* impacts to historical resources as described for the proposed Project. Potential impacts to previously unidentified archaeological resources, human remains, and tribal cultural resources under this alternative would also be similar to those under the proposed Project. The addition to the eastern side of the RCFE Building under Alternative 6 would result in a greater building footprint as compared to the proposed Project and thus, a greater area of ground disturbance during construction. However, the type of ground disturbing activities (e.g., excavation, trenching, grading, etc.) and depth of excavation (i.e., 26 feet) would be the same as those described for Phase 1 and Phase 2 of the proposed Project (refer to Section 2.5.1.6, *Construction Activities* and Section 2.5.2.4, *Construction Activities*). Given the extensive previous disturbance at and in the immediate vicinity of the Project site, the Project site is unlikely to contain any intact, previously undisturbed archaeological resources, human remains, or tribal cultural resources (refer to Impact CUL-2 Section 3.4, *Cultural Resources and Tribal Cultural Resources*). Similar to the proposed Project, MM CUL-1 and MM CUL-2 would also apply to this alternative and would substantially reduce potential impacts related to inadvertent discovery of any previously unknown archaeological

resources, human remains, and tribal cultural resources to *less than significant with mitigation*, as described for the proposed Project.

Energy

As previously described, construction activities under Alternative 6 would be the same as those described for the Phase 1 preliminary site development plan and would be similar to those described for the Phase 2 development program of the proposed Project (refer to Section 2.5.1.6, *Construction Activities* and Section 2.5.2.4, *Construction Activities*). Construction of Alternative 6 would require a similar amount of energy consumption for on-site demolition and construction activities, transport of demolition debris, soil, and construction materials, and construction worker commute trips as described for the proposed Project. Electricity would be used during demolition and construction activities to provide temporary power for lighting, electronic equipment, and certain construction equipment (e.g., electric-powered hand tools and other equipment). Construction-related electricity use would be temporary and negligible over the long-term. Diesel fuel would be required to power heavy construction equipment and haul trucks exporting demolition debris and soil and delivering construction materials to the Project site. Alternative 6 may require slightly more haul truck trips to export asphalt demolition debris and soil associated with construction of the eastern addition to the RCFE Building. Therefore, Alternative 6 would more construction fuel than the 1,910,839 gallons described for the proposed Project; however, impacts associated with Alternative 6 would be *less than significant*, as described for the proposed Project.

As described for the proposed Project, operation of Alternative 6 would decrease electricity demand following buildout of the Phase 1 preliminary site development plan and permanently increase the electricity demand following buildout of the Phase 2 development program by approximately 2,611,552 kWh per year as compared to existing conditions. The natural gas demand for operation of Alternative 6 would increase by approximately 25,475 therms per year as compared to existing conditions. However, Alternative 6 would incorporate the same sustainability features as described for the proposed Project, such as the installation of photovoltaic solar panels, solar hot water systems, energy-efficient HVAC systems, high-performance insulation, and lighting systems designed with occupancy sensors and dimmers to minimize energy use as described for the proposed Project (refer to Section 2.5.1.5, *Sustainability Features*). New buildings would also meet the equivalent of LEED Gold Certification and would be WELL Building Certified. The combination of energy-saving and energy-generating features demonstrates the commitment of Alternative 6 to renewable energy supplies and would ensure that Alternative 6 would not use energy in a wasteful or inefficient manner.

Similar to the proposed Project, Alternative 6 would support the energy conservation and GHG reduction goals and policies established in the Redondo Beach General Plan, Climate Action Plan, Sustainable Development Plan, and Sustainable City Plan, as well as the Torrance General Plan and TMC. Implementation of the sustainable design features described above demonstrate the commitment of Alternative 6 to reduce overall energy demand, including the reliance on non-renewable energy supplies, as called for in the Redondo Beach General Plan, Climate Action and Adaptation Plan, Sustainable Development Plan, and Sustainable City Plan, and the Torrance General Plan and TMC.

Geology and Soils

Impacts related to geological resources and paleontological resources under Alternative 6 would be the same as those described under the proposed Project as geological impacts are generally site-specific and existing geology and soil conditions would be the same as those described for the Project site under Impact GEO-1 in Section, 3.6, *Geology and Soils*. As with the proposed Project, implementation of MM GEO-1 would be required to address geologic impacts related to seismic-related ground failure and liquefaction-related dynamic settlement, drainage and soil erosion during excavation, and potential collapse of excavated slopes. Standard regulatory conditions requiring compliance with the UBC, CBC, RBMC, and TMC would address geologic hazards under this alternative. As with the proposed Project, compliance with regulatory requirements and the implementation of MM GEO-1 would reduce impacts to geology and soils under Alternative 6 to *less than significant with mitigation*.

While the addition to the eastern side of the RCFE Building under Alternative 6 would result in a greater area of ground disturbance as compared to the proposed Project, this alternative would result in the same depth of ground disturbance as the proposed Project. Therefore, impacts to paleontological resources would remain similar to those described for the proposed Project (refer to Impact GEO-4 in Section 3.6, *Geology and Soils*). While the Pleistocene-aged alluvium deposits underlying the Project site have a low potential for containing paleontological resources, paleontological resources may still be present and would be protected or collected and deposited in accordance with MM GEO-2a and -2b. Therefore, potential impacts to paleontological resources would be *less than significant with mitigation*.

Greenhouse Gas Emissions and Climate Change

Impacts related to GHG emissions and climate change under Alternative 6 would remain similar to those described for the proposed Project. Given that the construction activities and the proposed programs and operational activities under Alternative 6 would remain similar to those described

for Phase 1 and Phase 2 of the proposed Project, GHG emissions anticipated under Alternative 6 would remain similar to those estimated for the proposed Project (refer to Section 3.7, *Greenhouse Gas Emissions and Climate Change*). Further, since this alternative would include the same uses as well as the same sustainability features as the proposed Project, impacts related to conflicts with plans and policies related to reduction in GHG emissions would be the same as those identified in Impact GHG-1 for the proposed Project and would be *less than significant*.

Hazards and Hazardous Materials

Impacts related to hazards and hazardous materials under Alternative 6 would be similar to those described for the proposed Project under Impact HAZ-1 through Impact HAZ-5 in Section 3.8, *Hazards and Hazardous Materials*. This alternative would require similar site preparation activities, including demolition and excavation. Accordingly, this alternative would result in similar risks of exposure to hazardous materials, including potential ACM, LBP, PCBs, and mold that could be released during demolition of the Beach Cities Health Center and the attached maintenance building during implementation of the Phase 1 preliminary site development plan and demolition of the parking structure and potentially the Beach Cities Advanced Imaging Building during implementation of the Phase 2 development program (refer to Impact HAZ-2, in Section 3.8, *Hazards and Hazardous Materials*). As described for the proposed Project, Alternative 6 would provide a subterranean service area and loading dock below the Project site in Phase 1 as well as the potential for subterranean parking depending upon the Phase 2 development program option. As such, the area of excavation and trenching would be similar to the proposed Project. Therefore, the potential for exposure to contaminated soils (i.e., PCE, benzene, and chloroform) would be similar (refer to Impact HAZ-2 in Section 3.8, *Hazards and Hazardous Materials*). Overall, impacts with regard to hazards and hazardous materials under this alternative would be similar to those described under the proposed Project. As such, MM HAZ-1, MM HAZ-2a through -2d, and MM HAZ-3 would require hazardous materials surveys, standard protocols following discovery of contamination, soils management plan, soil vapor monitoring, and enrollment in the CalGEM's Well Review Program. Compliance with standard regulatory conditions and mitigation measures would reduce impacts to *less than significant with mitigation*.

Hydrology and Water Quality

Construction

Construction-related impacts related to hydrology and water quality under Alternative 6 would remain similar to those described for the proposed Project. As with the proposed Project, construction of Alternative 6 would involve major earthwork, including excavation and shoring

for subterranean levels, grading, and trenching for utilities, which would disturb the underlying soils and expose them to potential erosion and sediment transport into adjacent storm drain inlets – particularly during storm events or during on-site watering. Alternative 6 would result in an additional disturbance footprint of approximately 29,500 sf along the eastern boundary of the campus, which would slightly increase the potential for erosion. However, implementation of BMPs developed in accordance with the requirements of the Construction General Permit would prevent violation of water quality standards and minimize the potential for contributing polluted runoff during construction of Alternative 6. Therefore, construction-related impacts to water quality associated with Alternative 6 would be *less than significant*, as described for the proposed Project.

Similar to the proposed Project, Alternative 6 would include excavation to a maximum depth of 26 feet bgs for the subterranean service area and loading dock of the RCFE Building during Phase 1 as well as the subterranean levels of the proposed parking structure and service areas under the Phase 2 development program. However, construction impacts to groundwater levels would be *less than significant*, as described for the proposed Project.

Operation

As with the proposed Project, Alternative 6 would result in a net reduction in the total amount impervious surface area compared to existing condition, which would reduce the potential for pollutants to become exposed during storm events. However, given the increase in the building footprint associated with the addition to the eastern side of the proposed RCFE Building, Alternative 6 would reduce pervious surface area by approximately 29,500-sf as compared to the proposed Project. Nevertheless, compliance with all applicable State and local regulations, would ensure that operational impacts to water quality would be *less than significant.* Further, implementation of Alternative 6 would improve groundwater recharge at the Project site and there would be *no impact* to groundwater quality as a result of Alternative 6.

Additionally, as described for the proposed Project in Impact HYD-3, Phase 1 of Alternative 6 would involve the construction of an on-site infiltration system designed to retain, treat, and infiltrate the 85th percentile storm into the groundwater. The existing storm drain infrastructure discharging to the City of Torrance municipal storm drain system at the storm drain line beneath Flagler Lane would be abandoned in place. Any flows larger than the design storm would be conveyed to North Prospect Avenue, where it would be conveyed through the curb and gutter to the nearest catch basin maintained by the City of Redondo Beach. These facilities have excess capacity and would continue to adequately serve the Project site with the implementation of

Alternative 6. Therefore, Alternative 6 would have a net increase in the impacts to drainage capacity as compared to the proposed Project; however, this increase would be *less than significant*.

Similar to the proposed Project, Alternative 6 would not conflict with implementation of any water quality control plans or sustainable groundwater management plans (i.e., the Ocean Plan, Basin Plan, GBMP, and 2015 UWMP) and impacts would be *less than significant*, as described for the proposed Project.

Land Use and Planning

Alternative 6 would be implemented with the alternative access and circulation design described in Alternative 3, with a right-turn access from Beryl Street and no vehicle entry/exit onto Flagler Lane. Implementation of the alternative access and circulation design would remove vehicle access from Flagler Lane within Torrance and therefore, would be consistent with TMC Section 92.30.8. This would also remove the need for a grading or building permit from the City of Torrance. (Landscape Plan approval would still be required for the proposed landscaping within the City of Torrance right-of-way.) Alternative 6 would be consistent with all other applicable land use plans, policies, and regulations. Therefore, impacts to land use and planning under Alternative 4 would be *less than significant*.

Noise

Construction

Under Alternative 6, impacts related to construction-related noise impacts would be increased compared to the proposed Project. Construction associated with the addition on the along the eastern boundary of the Project site would increase the intensity of construction activity along the eastern perimeter of the BCHD campus, which is located adjacent to sensitive receptors within the Torrance neighborhood. Similar to the proposed Project, these construction noise levels would exceed FTA's residential construction noise impact criterion. The necessary noise barrier heights required to mitigate noise from construction activities above 30 feet are considered infeasible (refer to Impact NOI-1 in Section 3.11, *Noise*). Therefore, construction-related noise impacts would be *significant and unavoidable*, as described for the proposed Project. However, the height of the RCFE Building under Alternative 6 would be reduced as compared to the proposed Project, as such the total duration of construction above the noise barrier would also be reduced.

Similar to the proposed Project, ground-borne vibration would be generated from the use of heavy construction equipment at the Project site, which could potentially expose existing sensitive land

uses in the vicinity to excessive vibration. Vibration levels generated during construction associated with Alternative 6 would be similar to those described for the proposed Project and *less than significant*.

Operation

As previously described, Alternative 6 would be implemented with the alternative access and circulation design described in Alternative 3, with a right-turn access from Beryl Street and no vehicle entry/exit onto Flagler Lane. Under Alternative 6, less then significant impacts related to operational vehicle noise would further reduced as compared to the proposed Project (refer to Impact NOI-3 in Section 3.11, *Noise*). Long-term operational noise impacts from HVAC equipment, parking operations, and on-site noise activities associated with Alternative 6 (i.e., outdoor seating, fitness classes, amplified music, etc.) would remain similar to those described for the proposed Project.

Population and Housing

Impacts related to population and housing under Alternative 6 would be the same as those described for the proposed Project under Impact PH-1 in Section 3.12, *Population and Housing*. As described for the proposed Project, these impacts would be *less than significant* under Alternative 6 as there is sufficient regional housing availability to meet these demands.

Public Services

Alternative 6 would result in the same demand for public services as described for the proposed Project. Therefore, environmental impacts resulting from increased demand for fire protection and police protection services for Phase 1 and Phase 2 of Alternative 6 would be *less than significant* as described for the proposed Project.

Transportation

Construction Traffic

While Alternative 6 would include an alternative access and circulation design and a reconfiguration of the RCFE Building, the proposed floor area of the RCFE Building would remain the same (i.e., 283,070 sf); therefore, the scope and duration of Phase 1 construction activities would be the same as those described for Phase 1 of the proposed Project (refer to Section 2.5.1.6, *Construction Activities*). Construction activities under Alternative 6 would remain similar to those described for Phase 2 of the proposed Project (refer to Section 2.5.2.4, *Construction Activities*). Implementation of MM T-2 would reduce impacts related to construction traffic and public safety

by requiring the preparation of a Construction Traffic and Access Management Plan. Therefore, Alternative 6 impacts to transportation during construction would be *less than significant*, as described for the proposed Project.

Operational Traffic

Alternative 6 would be implemented with the alternative access and circulation design described in Alternative 3, with a right-turn access from Beryl Street and no vehicle entry/exit onto Flagler Lane. The alternative access and circulation design would reconfigure the one-way driveway included in Phase 1 of the proposed Project to address concerns raised by the City of Torrance and the Torrance neighborhood residents related to vehicle access along Flagler Lane. Potential impacts associated with this alternative access and circulation design are described in detail for Alternative 3.

Given that the proposed uses under Alternative 6 would be the same as those described for Phase 1 and Phase 2 of the proposed Project, operational vehicle trips and VMT would also be the same as those described for Phase 1 and Phase 2 of the proposed Project. While not required to mitigate a significant impact, implementation of recommended MM T-1 would include preparation and implementation of a comprehensive TDM plan, which would provide trip reduction strategies for BCHD employees, tenants, and campus visitors, as described for the proposed Project (refer to Section 3.14, *Transportation*).

Utilities and Service Systems

Water Infrastructure and Supply

Construction activities under Alternative 6 would be similar to those described for Phase 1 and the same as those Phase 2 of the proposed Project (refer to Section 2.5.1.6, *Construction Activities* and Section 2.5.2.4, *Construction Activities*). Alternative 6 would result in an additional disturbance footprint of approximately 29,500 sf along the eastern boundary of the campus, which would slightly increase the need for water use for dust control. However, impacts would remain *less than significant*, as described for the proposed Project.

As described for the proposed Project, the existing water flow and pressure at the Project site is adequate to serve Alternative 6 in accordance with Appendix B of the 2016 California Fire Code (John Labib & Associates 2020). Cal Water's potable water system has the infrastructure and the capacity to serve the development under Alternative 6. Cal Water provided a will serve letter to BCHD on November 12, 2019 indicating that after all of the required permits are obtained, Cal Water will provide water service in accordance with the rules and regulations of the CPUC (Cal

Water 2019). Given that Alternative 6 would result in the same building square footage and uses as the proposed Project, Alternative 6 would be adequately served by Cal Water's existing water entitlements. Therefore, Alternative 6 would be consistent with local policies and operational impacts on potable water use would be *less than significant*.

Wastewater Collection, Conveyance, and Treatment

Construction-related impacts to wastewater under Alternative 6 would also remain similar to those described for Phase 1 and Phase 2 of the proposed Project (refer to Section 3.15.2, *Wastewater Collection, Conveyance, and Treatment*). Given that Alternative 6 would result in the same building square footage and uses as the proposed Project, operation of Alternative 6 would generate the same amount of wastewater as the proposed Project. Therefore, implementation of Alternative 6 would result in a *less than significant* impact on existing wastewater infrastructure.

Solid Waste Management Services

Similar to the proposed Project, Alternative 6 would be required to comply with the Redondo Beach Construction and Demolition Ordinance, including submittal of a waste management plan that would divert at least 50 percent of materials generated during C&D from landfills. The C&D waste would be delivered to certified C&D waste processors within the region where it would be recycled, as feasible. Given that Alternative 6 would development the same building square footage and land uses as the proposed Project, the solid waste associated with Alternative 6 would be the same as that described for the proposed Project. The solid waste associated with Alternative 6 would represent a very small percentage of the inert waste disposal capacity in the region. Therefore, Alternative 6 would not create a need for additional solid waste disposal facilities to adequately handle construction-generated inert waste and impacts would be *less than significant.*

Relationship of Alternative to Project Objectives

Alternative 6 would attain all of the Project objectives. By vacating and demolishing the Beach Cities Health Center in Phase 1, Alternative 6 would eliminate the seismic safety and other hazards of this building (Project Objective 1). Development of the 157 Assisted Living units and 60 replacement Memory Care units in Phase 1 would generate sufficient revenue to support BCHD's current level of programs and services as well as address future community health needs (Project Objectives 2 and 6). As described for the proposed Project, Alternative 6 would integrate these assisted living facilities with the broader community through intergenerational programs and shared gathering spaces within the other public health and wellness facilities on campus, such as the Aquatics Center and CHF (Project Objective 4). The proposed space for PACE, Community

Services, and the Youth Wellness Center included in the Phase 1 preliminary site development plan as well as the Wellness Pavilion, Aquatics Center, and CHF included in the Phase 2 development program would support programs that address growing future community health needs (Project Objective 6). Redevelopment of the BCHD campus with the proposed RCFE Building in Phase 1 and proposed buildings(s) included in the Phase 2 development program would create a modern campus with facilities designed to meet the future health needs of residents (Project Objective 5). The configuration of the new vehicle entrance and northern perimeter road would eliminate the backyard garden lounge private open space dedicated for Assisted Living and Memory Care residents. Additionally, the 3-story addition to the eastern side of the RCFE Building would replace some of the public open space (i.e., central lawn) proposed for the interior of the Project site under the proposed Project (refer to Figure 5-2). The public open space that would be provided under Alternative 6 would be able to accommodate programs that meet community health needs and provide a meeting space for public gatherings and interactive education (Project Objectives 3 and 5), although to a lesser extent than the proposed Project.

5.6 IDENTIFICATION OF ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives shall identify an environmentally superior alternative among the alternatives evaluated in the EIR. In general, the environmentally superior alternative as defined by CEQA should minimize adverse impacts to the project site and its surrounding environment.

Table 5.5-5 compares the environmental impacts of the proposed Project and the analyzed alternatives. Of the alternatives considered, the No Project Alternative generates the fewest environmental impacts; therefore, it is generally environmentally superior to any project that proposes to change existing conditions through the addition of increased development with associated impacts. However, CEQA Guidelines Section 15126.6 states that if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives.

According to CEQA Guidelines Section 15126.6(a), the purpose of an alternatives analyses is to identify alternative developments that would feasibly attain most of the basic objectives of the project but that would avoid or substantially reduce any of the significant effects of the proposed Project. Other than the No Project Alternative, none of the remaining alternatives would avoid the significant and unavoidable construction-related noise impacts at nearby sensitive receptors. Daily construction-related impacts would be similar to those described for the proposed Project (i.e.,

construction noise levels would be similar; however, the total duration of construction noise would be reduced due to the elimination of the Phase 2 development program).

Table 5.5-5. Impact Comparison of Alternatives to the Proposed Project

Issue Area	Project	Comparison to Project				
		No Project	Alternative 2	Alternative 3	Alternative 4	Alternative 5
Aesthetics and Visual Resources	Less than Significant with Mitigation	Less	Slightly Less	Slightly Less	Similar	Slightly Less
Air Quality	Less Than Significant with Mitigation	Less	Similar	Less	Slightly Less	Similar
Biological Resources	Less Than Significant with Mitigation	Slightly Less	Similar	Slightly Less	Similar	Similar
Cultural Resources and Tribal Cultural Resources	Less Than Significant with Mitigation	Less	Similar	Slightly Less	Similar	Similar
Energy	Less Than Significant	Less	Similar	Less	Slightly Less	Similar
Geology and Soils	Less Than Significant with Mitigation	Less	Similar	Less	Similar	Similar
Greenhouse Gas Emissions and Climate Change	Less Than Significant	Less	Similar	Less	Slightly Less	Similar
Hazards and Hazardous Materials	Less Than Significant with Mitigation	Less	Similar	Slightly Less	Similar	Similar
Hydrology and Water Quality	Less Than Significant	Less	Similar	Slightly Less	Slightly Less	Similar
Land Use and Planning	Less Than Significant	Less	Less	Slightly Less	Slightly Less	Slightly Less
Noise	Significant and Unavoidable	Less	Similar	Less	Slightly Less	Similar
Population and Housing	Less Than Significant	Slightly Greater	Similar	Slightly Less	Similar	Similar
Public Services	Less Than Significant with Mitigation	Less	Similar	Slightly Less	Similar	Similar
Transportation	Less Than Significant with Mitigation	Less	Slightly Less	Less	Less	Slightly Less
Utilities and Service Systems	Less Than Significant	Less	Similar	Less	Slightly Less	Similar
Meets Most of the Project Objectives?	**Yes**	**No**	**Yes**	**No**	**Yes**	**Yes**

Alternative 5 would reduce the maximum roof height of the RCFE Building and would retain the existing views of the Palos Verdes hills from the highpoint at the intersection of 190th Street & Flagler Lane (i.e., Representative View 6); however, this alternative would include a 3-story addition to the eastern side of the RCFE Building, which would increase the building mass and reduce views of open sky as viewed from the Torrance residential neighborhood to the east. This alternative may also increase the intensity of construction related air quality and noise impacts in the Torrance neighborhood to the east of the campus.

Alternatives 3, 4, 5, and 6 would all be implemented with the alternative access and circulation design described for Alternative 3. This alternative access and circulation design would ensure consistency with TMC Section 92.30.8 (refer to Section 3.10, *Land Use and Planning*) and would avoid potential constraints associated with the City of Torrance's ongoing consideration of the removal of the southbound movement along Flagler Lane (refer to Section 3.14, *Transportation*). As described in Section 3.10, *Land Use and Planning*, the one-way driveway and pick-up/drop-off exit onto Flagler Lane and the service area and loading dock entry/exit onto Flagler Lane may potentially be inconsistent with TMC Section 92.30.8, which prohibits site access to commercial properties from local streets when access from an arterial road is available. Additionally, the City of Torrance is also planning to pilot the temporary removal of the southbound vehicle movement along Flagler Lane between Beryl Street and Towers Street, to address neighborhood concerns regarding existing cut-through traffic, particularly as it relates to pick-up and drop-off at Towers Elementary School. If the pilot is successful, the City of Torrance may permanently remove southbound traffic along Flagler Lane south of Beryl Street. This change to the transportation network would prevent service vehicles from entering the subterranean service area and loading dock. The alternative access and circulation design would direct service and delivery vehicles to the reconfigured one-way driveway off of Beryl Street, which would provide access to the subterranean service area and loading dock. Under the alternative access and circulation design, less than significant impacts related to potential inconsistency with TMC Section 92.30.8 and cut-through traffic in the Torrance neighborhood would be eliminated.

Additionally, less than significant impacts related to vehicle headlights and operational noise associated with the one-way driveway exit onto Flagler Lane and the service area and loading dock entry/exit onto Flagler Lane would be eliminated under the alternative access and circulation design. For example, the alternative access and circulation design would eliminate the one-way driveway exit onto Flagler Lane and associated potential for minor light impacts from vehicle headlights shining towards the residences east of Flagler Lane. The alternative access and circulation design would also further reduce operational noise levels (e.g., vehicle traffic, trash

compacting and delivery truck operations) at nearby sensitive receptors (i.e., the Torrance neighborhood to the east of the Project site) from vehicles entering/exiting the driveways and traveling on Flagler Lane under the proposed Project.

Alternative 4 is the environmentally superior alternative because it would substantially reduce the severity of the construction-related noise impacts, which would be significant and unavoidable under the proposed Project. This alternative would reduce the total duration of construction-related noise to 29 months over one phase of development. Additionally, this alternative would similarly reduce the duration of construction-related criteria pollutant and GHG emissions. Finally, Alternative 4 would eliminate the net increase in trips associated with Phase 2 and would instead result in a substantial reduction relative to existing conditions. However, while this is the environmentally superior alternative, it is unclear if this alternative would be financially feasible given the required reduction in the height of the proposed RCFE Building required by MM VIS-1, without any replacement of the square footage (e.g., as described for Alternative 6). As such, Alternative 4 may not be able to meet the Project Objective 6 to *"[g]enerate sufficient revenue through mission-derived services and facilities to address growing future community health needs."*