

From: EIR <eir@bchd.org>
Sent: Friday, August 02, 2019 1:34 PM
To: Meisinger, Nick
Subject: Fw: BCHD Healthy Living Campus Master Plan

From: Jane Abrams <jabrams657@aol.com>
Sent: Sunday, July 28, 2019 6:14 PM
To: EIR <eir@bchd.org>
Subject: BCHD Healthy Living Campus Master Plan

Nick Meisinger, Environmental Planner & BCHD team:

A full EIR report for the Beach City Healthy Living Campus Master Plan for 514 N. Prospect Avenue, Redondo Beach, CA 90277, must address all the potential and significant impacts to the community and the residential neighborhoods surrounding the 11 acre site.

Some of the major concerns I have about this plan include significant impacts to:

Traffic

Noise

Air Quality

Hazardous Materials removal

Water

Infrastructure (sewers, roads and underground utilities)

Soil Conditions & Geotechnical

Traffic

Studies of Prospect Avenue & adjacent streets need to be conducted with details on the current volume of vehicle trips to the site especially during peak hours when commuters and school related vehicles use these roads. Prospect is a very heavily traveled north to south route for all beach city residents as there are several schools on or on nearby streets. It is a route used as an alternate to the congested Pacific Coast Highway.

There will be a significant increase in traffic when construction takes place for the extended 15 year period. There will be heavy construction and maintenance/delivery vehicles and vehicle trips from the construction workers who will be traveling to the site for an extended period of time over the 15 year period. A study needs to examine how many trips daily will be required during construction periods.

When the Campus is complete, there will be a significant increase in vehicle traffic because of the employees working at this facility as nurses and support employees at 420 residential care for the elderly units, the childcare facility and healthy living campus in general. The site will be a community gathering place and hold special and on going events and exercise classes. Again, more vehicles will be using Prospect than in 2019. There is no way to widen the roadway to add additional lanes to accommodate increased traffic. The site will also see an increase in maintenance and delivery trucks, trash disposal trucks and emergency vehicles.

Noise

The EIR needs to address the noise levels of the excavation and construction at this site. Heavy equipment will be required in the construction of the new buildings and the underground parking garage. This master plan is 15 years and there will be extended periods of construction effecting the the current and existing medical offices, memory loss facility and fitness center.

Air Quality

A major concern for nearby residents because of dust and debris from the construction site. Strict measures will be required and have to be monitored to maintain a safe environment, release of all dust and debris kept to a minimum, for current offices and facilities open for business on the site.

Hazardous Materials

Asbestos, lead paints, chemical waste and anything contained in the original building will require special attention to their removal during demolition and construction periods. Studies and special reports are required for the plans to dispose of any hazardous material found at this site.

Water

Use of water to control dust during construction is common practice. What volume of water is required and where is the source for this?

When the residential care units are complete, there will a significant increase at the site in the use of water for all the residents, for use in all the kitchen and laundry facilities required to support the residential units. Again, studies are needed to address this issue.

Infrastructure (sewers and all utilities, access or access road ?)

Additional sewer lines and underground utilities will be required for the added facilities at the site. Will there be a

service or access road on site for deliveries, maintenance and trash disposal trucks to use?

Soil and Geotechnical reports

Studies of the soil on the current site will be required. Examining the condition of current soil and what additional fill will be required to support the added facilities. Is this site on any earthquake fault? EIR reports have to include a

detailed geotechnical report to make sure all buildings, existing and new) meet the latest building codes.

I look forward to seeing a full EIR completed to support the proposed plans for 514 N Prospect Avenue.

Thank you for addressing the above concerns.

Best regards,

Jane Abrams

416 Avenue G, Unit 1

Redondo Beach, CA 90277

310-678-1345

WRITTEN COMMENT FORM
BEACH CITIES HEALTH DISTRICT
HEALTHY LIVING CAMPUS MASTER PLAN EIR

If you would prefer to submit written comments, please complete this written comment form. Continue on the back of the form or attach extra pages, as necessary.

In order to be addressed in the Draft Environmental Impact Report (EIR), written comments must be received by the close of the public comment period at 5:00 PM on July 29, 2019.

NAME: _____

TITLE/ORGANIZATION: _____

ADDRESS: _____
(Street) (City/State/Zip)

—COMMENTS—

• TRAFFIC CONCERNS REGARDING CONGESTION
IN THE AREA OF FLAGLER LANE IN THE
CITY OF TORRANCE. SCHOOL (TOWERS) TRAFFIC
BRINGS CURRENT CONGESTION.

• SINCE TORRANCE RESIDENTS WILL BE
AFFECTED, WILL THEY BE INCLUDED AS PART
OF BEACH CITIES? (THERE IS A TORRANCE BEACH.)

Please hand this completed form to Wood staff at the sign-in table or mail to:

Mr. Nick Meisinger, Environmental Planner
Wood Environment & Infrastructure Solutions, Inc.
9210 Sky Park Court, Suite 200
San Diego, CA 92123

Written comments may also be e-mailed to:
EIR@bchd.org

From: EIR <eir@bchd.org>
Sent: Friday, August 02, 2019 1:29 PM
To: Meisinger, Nick
Subject: Fw: Redondo Beach medical center

From: Randy <raotes@hotmail.com>
Sent: Friday, July 26, 2019 8:44 PM
To: EIR <eir@bchd.org>
Subject: Redondo Beach medical center

□□-1 | 15 years of construction, the back yard of my home is caving in already, to have this humongous facility on tip
□□-□ | of the hill will for sure cause the land to shift. Noise pollution along with increased traffic, vagrancy and
□□-□ | trash. This proposal will ruin the property value as well. Health from all the machinery, not to mention an
□□-□ | old capped oil pipe(line). Please reconsider this proposed facility as it will not improve the quality of life for
anyone who lives in the area.

Thank you,

Mr and Mrs Henry Aoto,
Randall Aoto

Sent from my iPhone

From: EIR <eir@bchd.org>
Sent: Friday, August 02, 2019 1:36 PM
To: Meisinger, Nick
Subject: Fw: Public Comments on Proposed BCHD Expansion Project

From: Robin AREHART <ararehart@yahoo.com>
Sent: Sunday, July 28, 2019 10:58 PM
To: EIR <eir@bchd.org>
Subject: Public Comments on Proposed BCHD Expansion Project

Robin Arehart
5649 Towers St.
Torrance, CA 90503
July 28, 2019

E-MAIL (EIR@bchd.org)
Wood Environment & Infrastructure Solutions
9210 Sky Park Court
Suite 200
San Diego, CA 92123

Attention: Mr. Nick Meisinger, NEPA/CEQA Project Manager

Re: Public Comments on Proposed BCHD Expansion Project

Dear Mr. Meisinger:

□□-1 | As a City of Torrance homeowner just one block from the proposed BCHD expansion, I must express my concern. I was truly shocked to learn of the grand scale of the project and strongly urge you to scale back to a version more suitable for this quiet neighborhood. My concerns relate to the health and safety of those of us who live nearby and/or attend Towers Elementary School. Ironically, □□-□ since the ultimate goal is to enhance community health, it is important to recognize and mitigate the harm such a project will bring to the surrounding area in terms of traffic and reduced air quality.

□□-□ | It was distressing to learn that there would be fifteen years of construction under the proposed plan. □□-□ As the older buildings are demolished, there will be toxins and debris released continuously into the air which will blow directly into our residential homes and the classrooms of school children. I am also concerned about the humungous parking garage gassing off right into our backyards. This □□-□ type of project is more suited to an industrial zone, not to a residential neighborhood.

□□-□ | Please do NOT have the parking garage exit onto Flagler. The route down Towers Street was not built for this type of traffic and already has a problem with cars speeding through stop signs. It is simply not fair to Torrance residents to handle the traffic flow for a Redondo Beach project. Prospect has four lanes and is more suited to heavy traffic. The same reasoning should be applied

□□-□ to the proposed truck route for construction. Flagler and Prospect should carry trucks out through 190th, not through our quiet Torrance neighborhood.

With great concern.

Robin Arehart

Edward L Arn
19432 Redbeam Ave
Torrance, CA 90503

Attention: Mr. Nick Meisinger, NEPA/CEQA Project Manager

Re: Public Comments on Proposed BCHD Expansion Project

Dear Mr. Meisinger:

General Comments

I have joined the extensive neighborhood communications concerning the proposed BCHD Expansion Project a bit late. Initially I found tons of text comments, but no evidence of graphics to help understand the scope and shape of the facility. I am an engineer and I best understand physical things through numbers, drawings, sketches and images.

One graphic I found in the email chain suggests the plan is to build the RCFE building out to the very limits of the property, especially along Flagler Lane (City of Torrance) and to have a large grassy interior area where the existing parking lot is located.



View of Proposed Expansion Looking East into West Torrance

□□-1 While this graphic clearly shows the expansion to provide extensive assisted living (RCFE) facility for the aging community, it does not reflect any sensitivity to the environmental impact imposed on the closely adjacent properties along Flagler Lane in Torrance. The discussions in the Master Plan only refer to the city of Torrance as being involved as a possible partner in developing a bicycle path along Flagler Lane. However, the Master Plan proposes to place the only entrance and exit to the new underground parking on Flagler, in the city of Torrance.

I understand that the BCHD is chartered in the communities of Redondo Beach, Hermosa Beach and Manhattan Beach as well as receiving funding from this same community. Thus, the focus of the expansion plan is the services to be provided to the Beach Cities. However, the potential environmental

□□-1 □□□□□□ impacts of the Project do not respect political or funding boundaries, but rather are driven by physical adjacency. It is now time to step back, walk around the boundaries of the Proposed Expansion and view the consequences as an adjacent property owner in Redondo Beach or in Torrance. Doing this will likely give rise to suggested mitigations and alternative designs that better balance the interest of all the affected parties. This assessment must consider the strong and persistent sea breeze the Beryl Heights and West Torrance communities experience. This westerly flow will push most of the airborne pollutants during construction into Torrance, not Redondo Beach.

□□-□ If I were one of the residents living just across Flagler on Tomlee Avenue , I believe I would feel the privacy of my back yard had been violated, much of my daylight had been taken away, my wonderful sea breeze blocked and the beauty of my site destroyed by the huge building towering over the houses. Much of the email I have read supports this view. There is clearly serious environmental impact assessment work to be done.

□□-□ Since I attended the Public Scoping Meeting at West High on July 18, I have discovered the Master Plan posted on the BCHD website and have found this document to be quite helpful. Much of it is well written and it does map out the major anticipated environmental impacts. However, a major shortcoming is the lack of a draft construction plan, leaving many vital issues to the imagination of the commenters.

I must remark that the fact that the initial schedule in the Master Plan for the Public Scoping Meetings for the Environmental Impact Report did not include is suspect. It appears to me that the planners may have turned a blind eye to the closely adjacent residents of West Torrance. This may have been an act of omission or a deliberate act of commission. In any case, it is wrong to push the impact of a major development across the boundary into another city and then ignore the interests of the neighboring property owners. Getting the proper scope for EIR should address balancing the interests.

Aesthetic Impact to Tomlee Residents

Some of my comments were motivated by the input (below) from Mark Nelson, who lives in the adjacent section of Redondo Beach. He rather clearly layed out what tools a proper environmental impact study should use to assist the impacted residents in evaluating the effects of the project:

Aesthetics

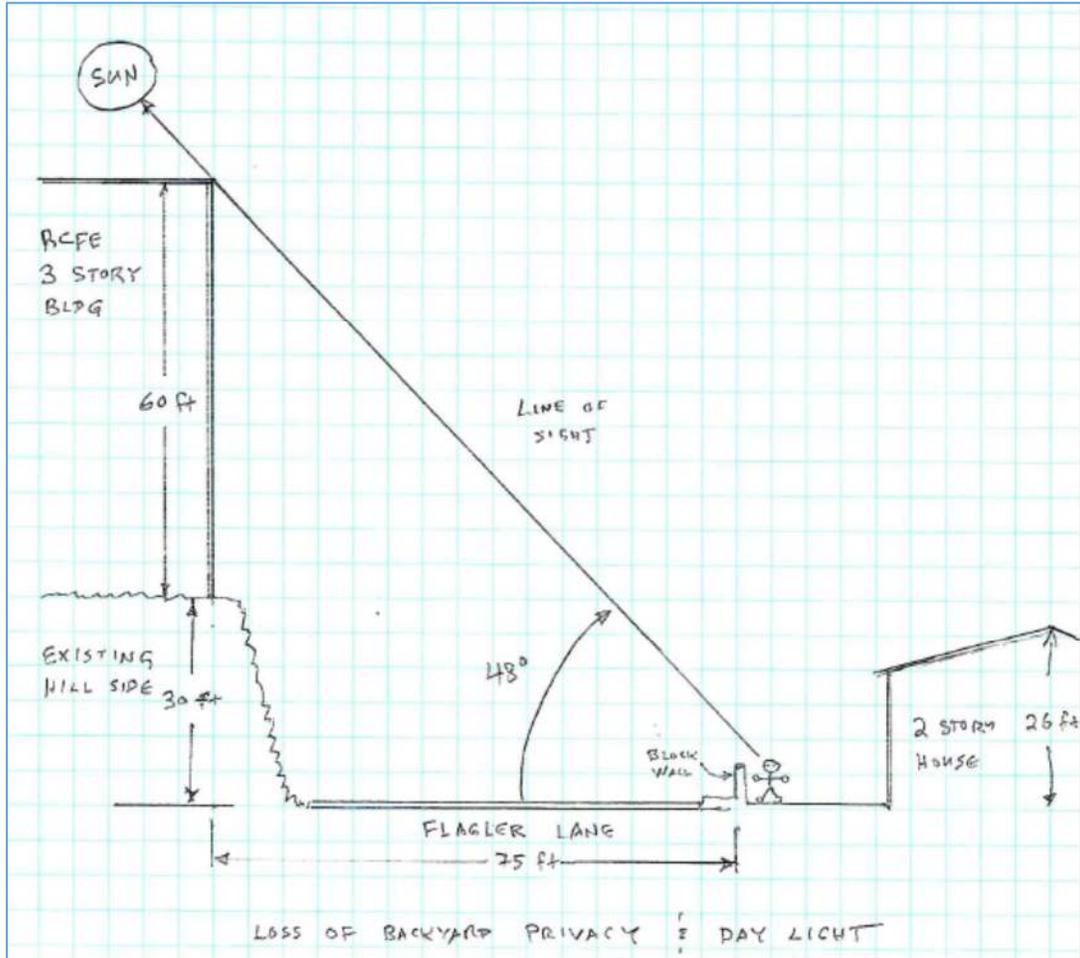
From the local neighborhood perspective, I continue to have my stated concerns about mass, height, setbacks, artificial lighting, sun reflection, and invasion of the visual privacy of the surrounding homeowners. Simulations, elevations, illustrations, and models will be needed to provide an adequate disclosure of the design. Again, because this is phased, it will be important to understand timing and activities on the BCHD site during the decade to 15 year interim period.

□□-□ I took on the simple task of trying to quantify and visualize the impact of the 60 ft high RCFE building to be set upon the 30 ft high ridge at the east edge of the BCHD Expansion Project. I started with simple methods learned in the Boy Scouts and followed up with augmentation from Google Maps satellite images. I am sure the architects designing the Project have much better tools for doing this job, but it was important to get a quantitative feel for the aesthetic down-side now.

Since I have no detailed drawings, I assumed the RCFE building was place at the edge of the existing parking lot on the top of the hill side. This is somewhat extreme, but the conclusions are still reasonably valid.

Loss of Backyard Privacy

The sketch below demonstrates that the proposed 60 ft high RCFE building, placed atop the existing 30 ft high hill side, would substantially destroy any perception of privacy in the backyard of the closest houses located on Tomlee Avenue. The backyard would be visible from all three levels in the assisted care building. Also, with the 48° sight line to the roof of the RCFE, the backyard would lose 3-4 hours of sunlight each afternoon.



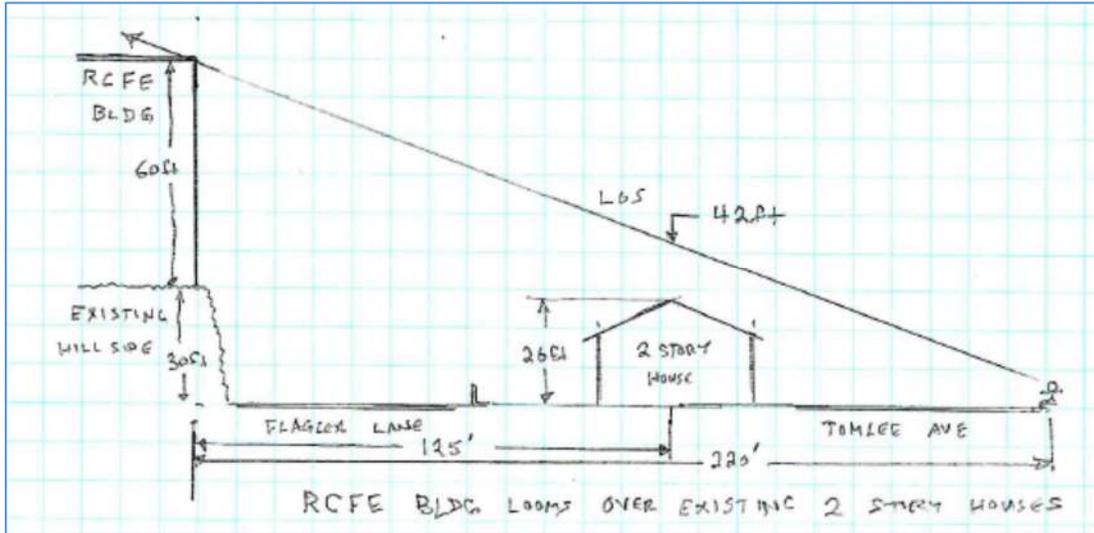
In the early morning, the tall, white face of the RCFE building will also greatly change the lighting. Usually, a room with a view to the west would remain dark as the sun rises. With the substantial concrete wall of the RCFE facing Tomlee, the morning will be much brighter. This could be good or bad, but it is certainly quite different than the existing condition.

Loss of Beauty due to Looming Building

The 60 ft RCFE building would stand high enough to completely change the skyline seen walking along the east side of Tomlee in our lovely community. As the figure below illustrates, the roof line of the RCFE building would loom well over the top of the two-story houses on the west side of Tomlee. Currently, this view only includes tree tops along the top of the hill side. I believe the characterization of the current BCHD plan as a monstrosity is justified. Surely there is another plan that could serve the needs

of the BCHD Expansion while not destroying the wonderful environment the residents of Tomlee have enjoyed for decades.

□□-□□
□□□□□□



□□-□

Having a suitable margin between the building and the street along with mature trees could soften the impact considerably. A setback of 150-200 ft from the east edge of the BCHD property would make a huge difference while still allowing plenty of room for assisted living facilities.

□□-□

Another negative effect of having the 60 ft RCFE building close to the eastern boundary, is the blockage of the wonderful sea breeze enjoyed by Redondo Beach and West Torrance residents alike. I do not currently have a way to quantify the effect, but I believe that having a 150-200 ft set back with trees between the building and the hill side would allow the flow to reattach to the hill side through turbulent flow. This could be a special topic for Environmental Impact Analysis and alternative development.

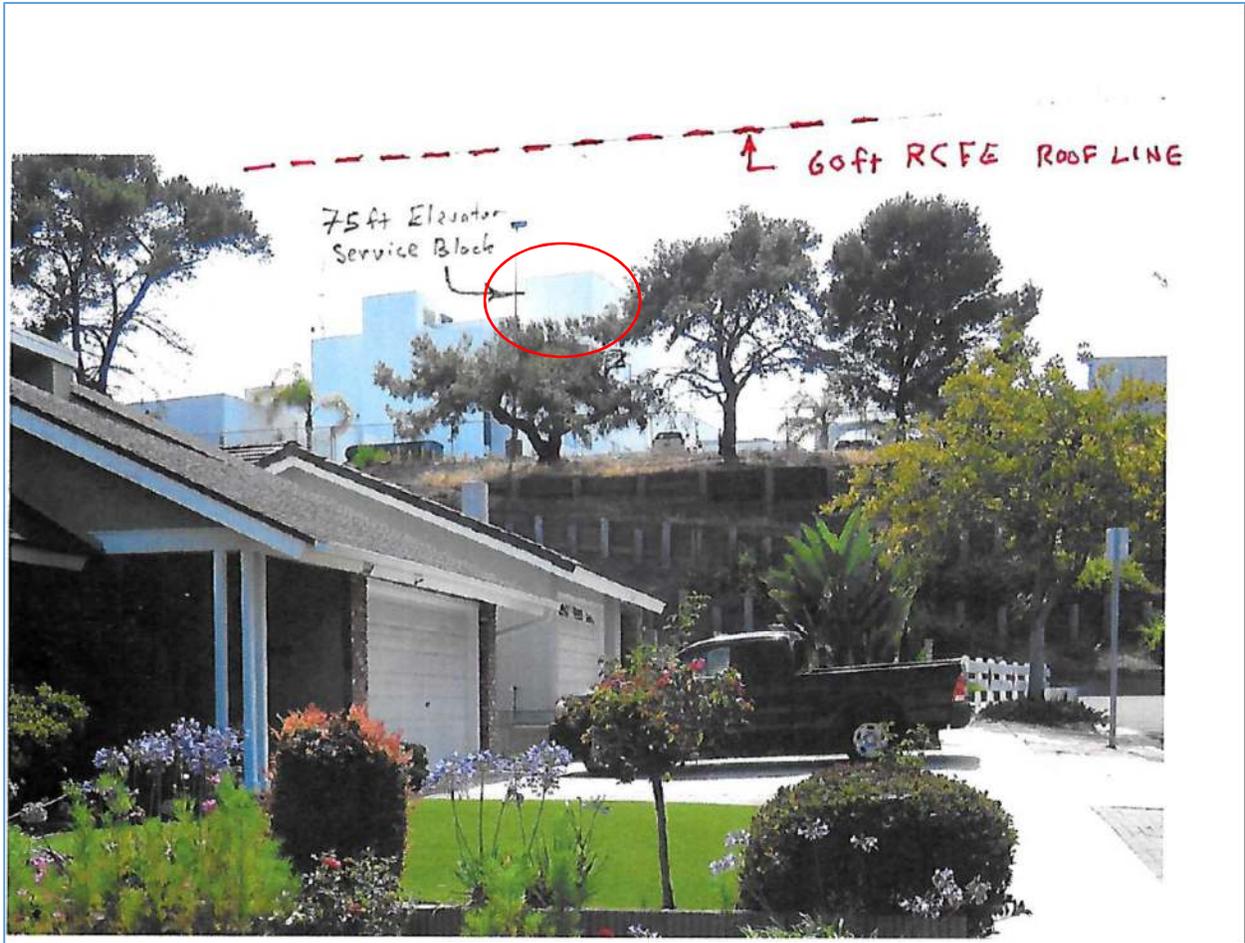
A Complaint

I was upset at the EIR Scoping Meeting to see a chart that characterized the proposed expansion project as substantially less intimidating due to the lower maximum height. The table below from the Master Plan makes the same assertion.

□□-1□

Current Beach Cities Health Center	BCHD Healthy Living Campus Master Plan
<ul style="list-style-type: none"> • 3-5 stories (75-foot maximum height) • 260,900 sf of occupied floor space <ul style="list-style-type: none"> - Beach Cities Health Center (60 Memory Care Units) - Maintenance Building - Medical Office (Advanced Imaging Building) - Medical Office (Providence Medical Institute Building) • 814 parking spaces 	<ul style="list-style-type: none"> • 3-4 stories (60-foot maximum height) • 592,700 sf of total development <ul style="list-style-type: none"> - RCFE Building (60 Memory Care Units and 360 Assisted Living Units) - Child Development Center - Community Wellness Pavilion - Medical Office (Providence Medical Institute Building; to remain) • Up to 690 parking spaces

My previous analysis of the aesthetic impact of the 60ft RCFE building atop the 30ft hill side shows things to be substantially worse with the Expansion Project as planned. The fact is that the 75 ft high existing elevator mechanics room is well within the boundaries of the BCHD site and is only 15 ft wide. As the phot below shows, this is a minor disturbance to the skyline (3-4 degrees wide).



□□-1□□
□□□□□□

In comparison, the roof line of the 60ft RCFE building (red dashed line) would loom almost 2X as high and subtend more than 160 degrees of the visual field.

Based on my analysis above, I characterize the Table 2 comments on maximum height as incomplete, misleading and downright disingenuous. It is a poor summary to provide to those who may be affected by the BCHD Expansion Project. The community deserves better.

Effect of Protracted Construction Schedule

The unusual, extended construction period of three, 3-year phases separated by 2-years of quiet, makes the period during which the neighborhoods are a construction zone extremely long. Usually, the permanent environmental impact of a project would be seen as more significant than the impact of construction since the facility would be completed after one or two years. With construction activities anticipated for the next 12 years, the concern for temporary effects of construction dominates the picture. In a sense, a 12-year period of construction activities makes this "temporary" inconvenience more like a permanent condition.

□□-11

□□-11□
□□□□□

Consider that most of the adjacent residential area in West Torrance is occupied by either families with young children (attracted by the good schools) or older couples who have retired in place. For these constituencies, a period of construction going on for 12 years is effectively “forever.” For the young families, twelve years covers the entire time from entrance into elementary school to graduation from high school. For those of us” retired in place,” twelve years may be all of our remaining life time.

Do not expect this community to accept the current construction plan, especially when the BCHD Master Plan does not include more than an outline of the necessary Construction Management Plan.

Ambiguous Discussion of Entrance for New Subterranean Garage

It is very clear that the residents of the closely adjacent West Torrance area are concerned with existing and increased through traffic on Towers/Redbeam Ave. I find that the Master Plan has two rather different versions of the entrance/exit location. On page 13 the Master Plan states the following intent.

- **Phase 1. Subterranean Parking and RCFE Building:** The proposed construction of Phase 1 improvements is planned to occur from approximately Summer of 2021 through Summer of 2024, dependent upon the timing of the permit process, financing considerations, and completion of final design work. During this initial implementation phase of the proposed master plan, the existing 70,000-sf surface parking lot and the associated perimeter circulation road located at the northern edge of the Project site would be removed and replaced with a two-level (i.e., 30-foot deep) 120,000-sf subterranean parking garage, providing up to 320 parking spaces. Access to this new parking garage would be via the northern entrance along North Prospect Avenue and/or a new entrance off of Flagler Lane, located approximately 100 feet south of its intersection with Beryl Street.

□□-1□

Given that the new parking garage would service both the RCFE assisted living wing and the relocated Center for Health and Fitness and the new Child Development Center, it seems reasonable to have both access from Prospect and from Flagler. The Flagler entrance/exit would serve the relocated services while the Prospect entrance/exit would serve assisted care (and other tenants).

However, on page 20 of the Master Plan a very different view is expressed. Here the text clearly states that the access to the new parking garage would be via a single entrance on Flagler Lane, a street in the city of Torrance. This is the version I have seen circulating in the e-mail traffic concerning the BCHD Expansion Project and is the catalyst for much hate mail.

I do not understand the rationale for a single entrance on Flagler and challenge the project management to produce a traffic study that shows such a choice is acceptable to the surrounding communities.

Proposed Parking and Circulation

As previously described, during the first implementation phase of the proposed master plan, the existing 70,000-sf surface parking lot and the associated perimeter circulation road located at the northern edge of the Project site would be removed and replaced with a two-level (i.e., 30-foot deep), 120,000-sf subterranean parking garage, providing up to 320 parking spaces. Access to this new parking garage would be via a single entrance off of Flagler Lane, located approximately 100 feet south of its intersection with Beryl Street. During Phase 2 this subterranean parking garage would be expanded by 40,000 sf providing up to 120 additional parking spaces. During Phase 3 the existing 54,000-sf above ground parking structure located at the southern portion of the Project site would be



Photo 7. The entrance to the existing subterranean parking garage is accessed from the main entrance off of North Prospect Avenue. This entrance and subterranean parking garage would remain in place under the proposed Project.

Lack of a Phased Construction Management Plan

Although there are outlines of the construction activities in each of the three phases, the current Master Plan has no more than an outline of the required Construction Management Plan. The following outline from page 22 names the many missing pieces of the construction puzzle that we currently have to imagine. Without specifics on things like haul routes and queuing areas, worker parking and the like we cannot provide focused inputs to the EIR scoping process.

The development application(s) for the proposed Project would include a Construction Management Plan, to be submitted for review and approval by the City of Redondo Beach, concurrent with the application for a Conditional Use Permit (CUP). At a minimum, the phased Construction Management Plan with describe:

- Detailed construction schedule and timing of activities by phase;
- Designated construction entrance(s) at the Project site;
- Temporary improvements (e.g., removal of raised medians, re-striping, etc.);
- Haul routes and queuing areas to be used during demolition, soil excavation and export, materials delivery, concrete truck deliveries;
- City-approved plans for re-routing vehicles, bicyclists, and pedestrians as well as required signage and/or construction flaggers;
- Construction equipment and materials laydown area(s) and other staging area(s); and,
- On- and/or off-site construction worker parking area(s).

This current lack of specific information is also likely to delay the initial Environmental Impact Report.

Geology: Soil Mechanics

The Master Plan includes a set of tables highlighting environmental issues that must be addressed in the EIR. Having spent a little time studying the existing 30 ft high hill side on the east side of the BCHD property, it occurred to me that placing the 3-story, 60 ft RCFE building atop the hill side will greatly change to load carried by the retaining wall. The template in the Master Plan already highlighted the concern for unstable soil and land slides.

Geology and Soils

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS. Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist, or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?				
iii) Seismic-related ground failure, including liquefaction?				
iv) Landslides?				
b. Result in substantial soil erosion or the loss of topsoil?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-site or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18- 1-B of the 1994 UBC, creating substantial direct or indirect risks to life or property?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

□□-1□

The hill side on the east edge of the property facing Flagler Lane is currently held in place by three tiers of wooden retaining walls, stabilized by telephone poles sunken deep in the earth. This has clearly been adequate for decades with the top of the adjacent hill side used for open-air parking.

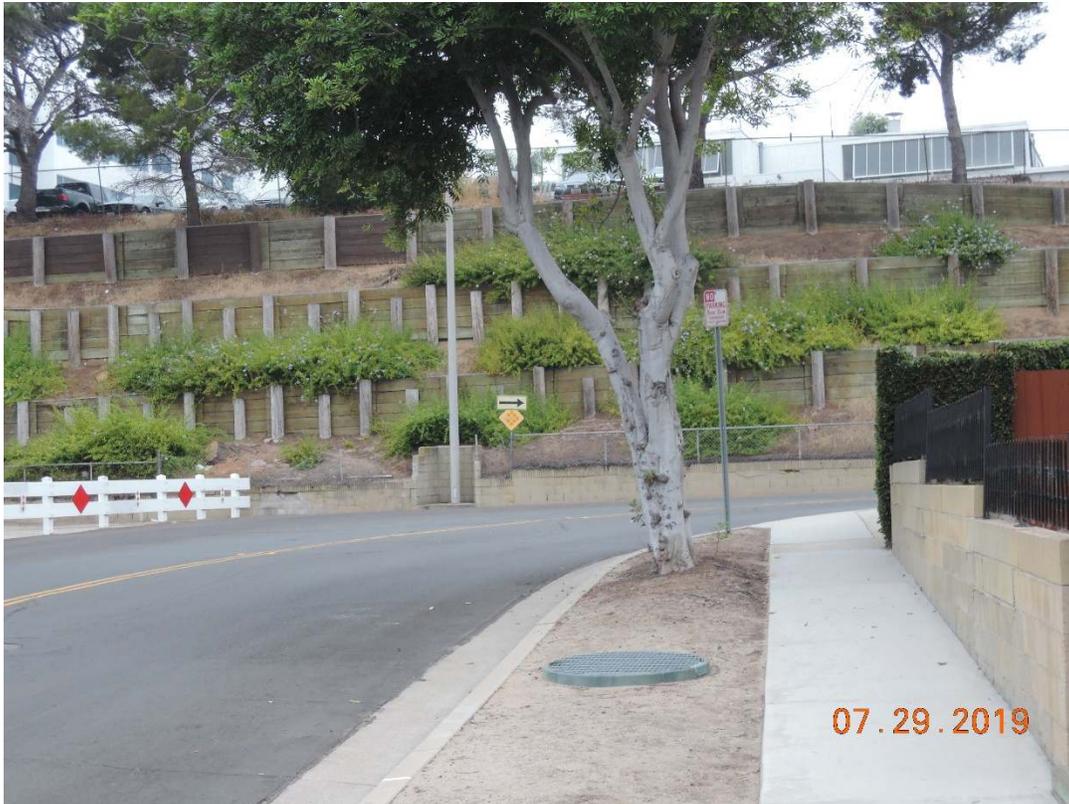
Clearly, placing the new 3-story RCFE concrete building on the “top of the slope of the Project site’s frontage with Flagler Lane” (as described on page 14 of the Master Plan), would greatly increase the loading on the surface next to the existing wooden retaining walls.

To explore this issue, I estimated the average loading (lb/ft²) for the current usage as an open-air parking lot and then with the new building. I assumed the average car weighed 3,000 lb with a fill-factor

of 60%. I then used the construction plan estimates of concrete haulage and square footage to estimate the loading from the Phase 2 RCFE addition along the east edge. The rough figures are as follows:

- Existing Parking Lot Loading 15 lb/ft²
- New RCFE Building Loading 300 lb/ft²

Although these figures are soft, it is still clear that the new facility will increase the loading that the retaining wall must handle by around 20X. This certainly brings the adequacy of the existing three-tier wooden wall into question.



View of Wooden Retaining Wall on East Edge of BCHD Property

Solutions to the retaining wall loading could involve a set-back of 100-150 ft for the new building or could involve construction of a new, much more capable retaining wall. I cannot find any reference to a new retaining wall on the frontage with Flagler Lane anywhere in the Master Plan. If such a change is required, it will be expensive addition and will greatly increase the excavation and construction near the residents on Tomlee Ave.

Sincerely,

Edward L Arnn
Raytheon Senior Principal Fellow (Retired)

Mr. Meisinger:

Thank you for the presentation in Redondo Beach last Monday. It was very professional, and enlightening. I knew very little about the Healthy Living Campus before that.

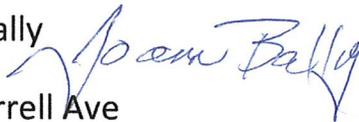
☐☐-1 I live in North Redondo. I go to meetings in the current facility, but we could go elsewhere. I do not want to help pay for this project with increased property tax.

☐☐-☐ I am concerned about the 15-year project. Things move quickly now, and though senior living facilities may look good they may not be needed (somebody else will get there first) when the plans kick in. Also, for instance, if somebody goes to the gym and it is closed, they will go somewhere else, e.g. 24-hr Fitness, and stay there.

☐☐-☐ I am also concerned about traffic, air quality, and other things discussed at the meeting. These will probably be more clear when the EIR is complete.

Thanks again.

Joann Bally



2001 Farrell Ave

Redondo Beach , CA 90278

310-372-8213, www.mindspring.com

Ramos, Ryan

From: EIR <eir@bchd.org>
Sent: Thursday, July 25, 2019 10:08 PM
To: Meisinger, Nick
Subject: Fw: BCHD Healthy Living Campus Master Plan

From: Sabrina Barakat <SabrinaBarakat@outlook.com>
Sent: Sunday, July 21, 2019 2:01 PM
To: EIR <eir@bchd.org>
Subject: BCHD Healthy Living Campus Master Plan

Dear Mr. Meisinger and Team:

After our Torrance meeting last Thursday, I began to wonder about the daily operations of the residential units, and now have additional environmental concerns.

SB-1 These comprise several categories, including **Greenhouse Gas Emissions, Noise and Vibration, Energy, Transportation, Utilities and Services System, Hazards, Population and Housing, Land Use and Planning, and Air Quality.**

SB-2 1) What will be the daily demands of water and electricity by the residential facilities? What by-products will result?

SB-3 Potentially, heating or air conditioning could be running round-the-clock in each of the 420 units. What emissions and noise will affect us down below?

Will laundry services take place on site? If so, that would be heavy activity for washing and drying machines. Will harmful air pollutants and noise result from that?

SB-4 If linen service is contracted out, that would mean trucks regularly coming and going on our residential streets, with their concomitant fumes and noise.

SB-5 Won't the cafeteria require lots of electricity for cooking appliances and refrigeration? There will also need to be ventilation of smoke, frying, etc. Where, to our homes below?

SB-7 High-capacity dishwasher machines will need to run three times daily. What emissions and noise will this cause?

SB-8 Also, trucks will need to come and go for food service deliveries. And other trucks will haul away trash. More air pollutants and noise. (Not to mention, traffic and heavy-vehicle damage to roads.)

SB-9 2) How will these utility needs be met?

Does this mean digging up our streets for months and months to install more underground conduits for electricity, water and sewage?

3) Child and Pedestrian Safety

SB-10

There are three elementary schools, plus a park with a playground, and the dog park, within a block of this facility. Does having 690 parking spots mean that the elderly residents will be driving? If they require assisted living, then wouldn't their safe-driving abilities be impaired? Also, there would be more delivery trucks whose drivers may not see children walking.

SB-11

4) Health of Trees and Plants
Our neighborhood has trees, plants and flowers on every street. Also there are lemon, orange and pomegranate trees that produce edible fruits. All of these plants require sunlight, which will be blocked by the 70-foot buildings on the hill.
If the health of these plants deteriorates, then it will affect oxygen/carbon dioxide levels and also harm the populations of birds, bees and squirrels that depend on them.

SB-12

In conclusion, the key issue is the scale of this project. It is easy to casually call this a "residential" place, but really it is a large commercial operation, with 420 rooms--bigger than many hotels. Hermosa's Holiday Inn on Pacific Coast Highway has just 80 rooms. Manhattan's Belamar has only 127 rooms and is located on major roadway Sepulveda. Redondo's Portofino Hotel on the Marina has 161 rooms. Redondo's Crowne Plaza at the harbor has 352 rooms. Even Manhattan Beach's Marriott Westdrift has fewer rooms, at 377, and it is located in an industrial park, off of the major street Rosecrans.

SB-13

These numbers suggest that the "Beach Cities" are willing to have large-scale facilities in commercial zones, but this project is even bigger-- and therefore highly inappropriate for a residential zone in general, and for this location in particular.
Unfortunately, given the unique situation that Torrance is located down-hill and down-wind of the proposed campus, I fear that the Beach Cities' healthy living will mean unhealthy living for Torrance (Towers Elementary School, Sunnyglen Park, West High School, and of course, Pacific South Bay neighborhood).

Thank you for your consideration of these and other concerns.

Sincerely,

Sabrina Barakat
19319 Tomlee Avenue
Torrance, CA 90503

-----Original Message-----

From: Dr. Deborah J. Beach, D.C. <dbeachdc@aol.com>

Sent: Friday, July 26, 2019 11:23 PM

To: EIR <eir@bchd.org>

Subject: NOP for BCHD

Mr. Nick Meisinger,

I am a resident on Redbeam in the neighborhood below your proposed project. As this project directly affects this neighbor in Torrance, I would ask for the full time period to evaluate the environmental affect on my home and existence in this living space as a result enormity of your project. I was informed by way of a letter, undated, under my door mat Wednesday July 17, 2019. You have a public review period for this NOP from June 27, to July 29, 2019.

DB-1

I am appealing your timeline and asking for an extension to August 30, 2019, to properly prepare as places an extreme burden on the environment impact of our neighborhood, from traffic, noise, population density, environmental allergen, to arsenic/insecticides.

DB-2

If your slogan is Live Well, Health Matters, I'm assuming we as Torrance residents are included.

Deborah Beach

Ramos, Ryan

From: EIR <eir@bchd.org>
Sent: Thursday, July 25, 2019 10:34 PM
To: Meisinger, Nick
Subject: Fw: Health District Project Concerns

From: Lauren Berman <laurberman19@gmail.com>
Sent: Wednesday, July 24, 2019 11:56 AM
To: EIR <eir@bchd.org>
Cc: Lauren Berman <laurberman19@gmail.com>
Subject: Health District Project Concerns

Hello,

LB-1 I am a resident that lives on Tomlee Ave (behind Flagler and the current health district building). I have two babies, a one and half year old and a three month old. I am concerned about how all of this construction is going to impact the air and what they are breathing in as we spend most of our time in the back yard playing. I am also concerned about the traffic that will now be exposed to our neighborhood. Below are some of my concerns and questions:

LB-2 Right now we feel comfortable walking our children through the neighborhood and feel safe that everyone driving through and around lives here. We have Towers elementary school that has an entrance through the field in our neighborhood and I am concerned that strangers driving through the neighborhood now can see our children, and expose them to extra traffic danger. We have very structured naps throughout the day and I am concerned that the LB-3 construction will be loud and impact these day sleep routines for my children. I am also concerned that we will have to stay indoors because I don't want them exposed to the construction particles in the air. We walk up Towers to Flagler LB-4 now to get to the bakery and kids gym on beryl, we will not be able to enjoy these walks anymore with massive construction.

Questions:

LB-5 How will the parking structure entrance impact traffic on Flagler leading down to Towers, Mildred, and Redeem? What is beach cities health doing to ensure that navigational systems aren't routing visitors through our neighborhood? What LB-6 is the effect of emissions from all of traffic that will not be coming in and out of Flagler?
LB-7 Are there safety concerns or precautions around the increased traffic?
LB-8 How will the construction impact the air quality?
LB-9 Will the health of my children be effected by playing outside and breathing in the construction particles?
LB-10 I understand that property used to contain oil - will this be omitted into the air?
LB-11 What is the expected level of noise and hours of construction? Will it be done on weekends?
What are the benefits to the Torrance community that is directly affected by this development? Is Torrance considered part of beach cities?
LB-12 What is being done to ensure that the construction is not polluting the air?
Will the construction be uprooting harmful particles?

Regards,

Lauren Berman

July 25, 2019

Wood Environment & Infrastructure Solutions
9210 Sky Park Court
Suite 200
San Diego, CA 92123

Attention: Mr. Nick Meisinger, Environmental Planner

Re: Public Comments on Proposed BCHD Expansion Project

Dear Mr. Meisinger:

It is my understanding that you are involved in the process of completing the scoping review and required analysis preliminary to the preparation of that Environmental Impact Report ("EIR", in any form) which will assess the viability of the Beach Cities Health District ("BCHD") proposed expansion of their campus located in Redondo Beach, CA, as outlined in their June 27, 2019 "Notice of Preparation" ("NOP") document.

I am a resident and homeowner on Tomlee Ave near the site of the proposed BCHD project. I have the following concerns regarding this development project. My concerns are as follows:

- 1) With the introduction of a new driveway to the parking structure on Flagler Ln, traffic will be greatly increased on this otherwise quiet residential street. Flagler Ln joins Towers St which enters the neighborhood and then becomes Redbeam Ave. Nearby Towers Elementary School has daily school kid drop-off and pick-up on Towers St. The significant increase in traffic will affect the safety of parents and kids during drop-off / pick-up times.
- 2) Construction of the new Flagler Ln driveway will likely cause road interference and possible closures which negatively impact the traffic flow for commuters who travel north out of the neighborhood and return home from the north. There is no other convenient exit/entry from/into the neighborhood in this direction. Commute times will increase for commuters that normally use this route, including myself. Can this proposed parking structure driveway be relocated to Prospect Ave (a more heavily travelled roadway) or perhaps eliminated altogether from the BCHD project?
- 3) During general construction, there will be many heavy trucks traveling around the neighborhood presumably using Del Amo Blvd and Prospect Ave. The persistent noise from these heavy vehicles will be a continuing irritant to nearby residents over extended periods (months / years) for the duration of the construction project which will last for 15 years.
- 4) Property values will drop considerably during construction according to a local real estate agent. This will be due to the noise from heavy vehicles in the area, additional pollution from vehicles and legacy building demolition. Why do our property values have to be suppressed for over a decade? After construction, the increased traffic on Flagler Ln, Towers St, Redbeam Ave will permanently suppress home values on / near those residential streets.
- 5) The final layout of the BCHD project looks massive. It appears overly grandiose and large compared to structures immediately surrounding it, including nearby apartment buildings and the many single family homes in the immediate area. The grand scale doesn't 'fit' the neighborhood. Why must the new complex be so large? Can it be scaled down in size?

Please take my concerns into consideration. Thanks for your time.

Sincerely,

Jay Bichanich

Engineer

Torrance Homeowner and Resident

From: EIR <eir@bchd.org>
Sent: Friday, August 02, 2019 1:27 PM
To: Meisinger, Nick
Subject: Fw: Beach Cities District Project

From: Borthwick, Jane <janedoodlebugsaxion@gmail.com>
Sent: Friday, July 26, 2019 8:08 AM
To: EIR <eir@bchd.org>
Subject: Beach Cities District Project

☐☐☐-1 | **WHAT A MONSTROSITY THAT WILL BE IN MY BACK YARD. STAY
☐☐☐ | OUT OF TORRANCE!!!!!!! WE DON'T NEED MORE TRAFFIC, NOISE,
☐☐☐ | AND POLLUTION. KEEP REDONDO BEACH A PROPER BEACH CITY.
☐☐☐ | WE DON'T NEED SKYSCRAPERS AND THE TRAFFIC IS HORRIBLE
☐☐☐ | NOW AND IT WILL ONLY WORSEN. THE CHARACTER OF RB WILL BE
GONE. YOU AREN'T INTERESTED IN THE WELFARE OF THE CITIZENS
ONLY IN CONTRIBUTING TO YOUR BANK ACCOUNTS!**

Jane Borthwick, Torrance, CA

July 29, 2019

Comments on Potential BCHD HLC Project and NOP/EIR Formulation, etc., et al

To Whom It May Concern including BCHD Board of Directors and Staff:

hlcinfo@bchd.org

After reviewing the information available, assessing the multiple long term cumulative impacts of the Proposed BCHD Project, per its Program Description, and the conclusions from the Alternatives, they all point to one conclusion: THE NO PROJECT ALTERNATIVE. All the effects of a Project, which it solely generates, is of a magnitude that the asking itself along with the imposing the proposed impacts upon the residents of Redondo Beach is beyond egregious if not felonious as well as immoral.

FB-1

Aesthetics, Air Quality, Biology, Energy, Geotechnical, GHG, HazMat issues, Hydrology, Noise and Noise abatement, Public Services and Utilities, Transportation and Parking, all generate SIGNIFICANT IMPACTS on the local fabric of Redondo Beach residents. These IMPACTS will require a staggering economic investment that **cannot** fully be mitigated BUT WILL forever change the Quality of Life in this City and its residents for the next 100 years.

FB-2

The scope of the Project requires Land Use be changed, a CUP be issued, changing Population and Housing issues that ARE NOT consistent with the City's current General Plan. Making these modifications is necessary in order to obtain APPROVAL that will allow imposing the staggering burden of these proposed IMPACTS be allowed and transferred to the local residents only.

One hopes it is not too much to ask that the elected officials of the BCHD would opine for those whom they represent and kill this outrageous, egregious, misguided Project before it becomes another tax burden upon local residents to clean up the legacy of this proposed mess.

BCHD is proposing to change and become a Southern California Regional hub no longer serving the Cities of Redondo, Hermosa, and Manhattan Beach. The final scope of the service proposed offerings will disproportionately serve the local user base and become a 98% **non**-Redondo, Hermosa, and Manhattan Beach City health provider. This is a change in the initial charge in the formation of BCHD.

For these few simple reasons alone the only sane conclusion is: THE NO PROJECT ALTERNATIVE.

Please acknowledge receipt of these comments.

Frank Bostrom | fbostrom@verizon.net

Resident of District 3 – Redondo Beach

Nick Meisinger
Environmental Planner

My name is Robert Brewer
I'm writing my concerns about
the project for Ricardo Beach Co.
Beach either Hospital Care units.

My address is 19602 Tomlee
Approx 150 ft from your proposed
Project. My address is a residential
neighborhood only. But with your
proposed plans you will put ~~in~~
there a constant flood of traffic
to & from your project. We already
deal with some unwanted traffic
that use as a cut thru,

with your proposed site and
plan it will become a traffic
hazard to residences as well
a school drop off area from
Cham on Town St.

Plus the constant sound
of traffic and narrow
driving streets and outgoing
car horns and alarms. Not
to mention the outgoing
construction for years which
noise & dirt & dust will
rain down on our homes.

Please rethink this
project

Robert BREWER
19602 Tomlee Ave
Torr CA 90503

From: EIR <eir@bchd.org>
Sent: Friday, August 02, 2019 1:28 PM
To: Meisinger, Nick
Subject: Fw: Beach Cities Health 15 year project: Public Comments and concerns.

From: fjbriganti@aol.com <fjbriganti@aol.com>
Sent: Friday, July 26, 2019 2:01 PM
To: EIR <eir@bchd.org>
Subject: Beach Cities Health 15 year project: Public Comments and concerns.

Public Comments and Concerns regarding Beach Cities Health District Project

Hi, I would like to list my public concerns and comments regarding the above Project for West Torrance residents adjacent to the Project.

* I understand the Project will be done in 3 stages over 15 years. But this does not mean that anyone of the 8 listed concerns plus others could and would not occur at anytime.*

Areas: 1. Construction, 15 years long term a. massive evacuation, demolition and construction will expose the West Torrance residential area 300+ homes (19600-X Tomlee Ave. and to the East) and Redbeam, Mildred, Towers & Linda Streets ***I am approximately 150 feet in line with the Project.*** and Tower's Elementary School (children)(large playground -360 ft adjacent to Project) Maximum exposure of dust, exhaust, fumes, noise and etc. will descend on our home and the other residents plus Towers school & playground!

2. Public Health and Safety:

Exposure into the environment from the demolition and construction (continuous) site will include such toxins as: medical components (bacterial, virus, fungus, mold and others that cannot be seen). This demolition of the medical campus (old hospital, medical and dental offices, surgical, medical labs, and etc.) will environmentally expose the West Torrance residential area and Tower's school and playground children to the before mentioned pollutants and toxins! The ground excavation and removal areas will expose the West Torrance residents to unknown contaminants and health issues. Ex. Flagler & Beryl Sts space for children's center will be on preexisting oil site!

Health issues due to Project noise exposure: stress, agitation, sleep issues, and etc. Health issues due to Project environmental exposures, lung issues, COPD, asthma, allergies coughing, throat and lung irritations and etc. ENT issues, hearing (noise), eye (irritants) dry eye, nose and throat irritation.

Specific health concerns and safety would be an ongoing problem (15 yrs)

The West Torrance residents who have current illnesses will be comprised to all the above. Residents who are on home oxygen care exposure to pollutants..

Pregnancy and residents: reproductive, genotoxicity, and teratogenic, affects.

Animal concerns due to the noise, vibration, and etc. (anxiety, barking, and etc.)

Asbestos, mercury, lead and chemical exposure to residents and school children due to building demolition and construction.

Air quality will most definitely be affected due to all the above as listed.

There are major EPA, ecotoxicological and environmental concerns!!!

3. Traffic West Torrance Pacific Southbay area: Flagler is a 2 way narrow curving street into the residential tract. Currently there exist a considerable traffic problem with non residents using this street for cut through (short cut) Redondo to Torrance! This has resulted increase non resident accidents, traffic and safety violations.

The Project has a subterranean exit onto Flagler this will be a serious safety issue. This exit will allow exit traffic through

- 11
□□□□□
- a residential and school area. There will be a major increase in exhaust, fumes, noise! and Safety problems !
There will be major construction and traffic activity on Flagler due to the Project creating a Safety problem and interfering with residential traffic.
- 1□
- There is a plan for a 10 foot pike path along Flagler. This will increase a major safety issue (Auto vs Pike). This will also create a bike route thru the residential area resulting in more safety issues. *example we currently have non residents who use the streets for practice racing (4-5X a week) with no regard for Safety, stop signs, speeding, conflict with neighbors, and disregard for residents.) This kind of problem will be increased. due to bike path.
- 1□
- Traffic problems: construction truck routes: heavy equipment. cement trucks, Waste Removal, an etc ..NO ROUTES Through the residential tract!!.(Flagler to Redbeam to Del Amo)
Flagler ave. will be a major traffic issue so will be Beryl (Tower's Elementary, school and playground) and Del Amo)
Flagler is a Residential street as mentioned above.
- 1□
- Traffic noise, fumes soot, will be a major problem.
Traffic and construction will also cause potential home problems(such as soot, dirt too paint, windows, patio areas.)
- 1□
4. Economic devaluation of West Torrance boundary residential homes and property!!
Looking at this 15 year massive construction site with traffic and privacy problems will definitely be a deterrent to new home sales and value..
- 1□
- 5 If Construction goes forward working days and hours must have limits? site monitoring for any violation and 24 hr contact company..
** Site must be monitored(levels) at all times for dust and noise(decibel limits for hearing safety-especially children and the elderly).
Concern for any delays in the Project resulting in any further continuing problems (traffic, noise, dust environmental and etc)
Concern :Beach Cities Health District Project financial default. **Complete Project Construction Bond**in place or other protections.***
- 1□
6. Disturbance of Wildlife inhabitants (crows, falcons, squirrels, skunks, possums, racoons and etc.)*on the East side and our West side.
* CA Fish & Game Wildlife regulations regarding endangered species.*
1. Fish & Game Codes: 3503 & 3503.5 disturbance of nesting birds and endangered Red Tail Hawk!!! (Hawk is seen here)
2. CEQA (compliance) report.
- 1□
- 7.****This construction Project will disturb and cause an infestation of rodents ,rats and others listed in #6 into our immediate residential and school areas!!!****
This will expose the residents(children and adults) to disease, home damage and exterminator expenses
Note: past construction in the area (Del Amo & Prospect) increase in rats and squirrels! into the track.
-
8. Aesthetics: We will have a very large and high commercial structure above us. , Which will impact our skyline view
1. And at night the structure lights will over illuminate our area below.

thank you, Dr. Frank and Glenda Briganti
19616 Tomlee Ave
Torrance, CA 90503
July, 26, 2019

Request: reply e-mail received

Public Concerns and Comments for Beach Cities District 15 year Project: Supplemental to July 26, 2019

Attention: Mr. Nick Meisinger

2. Public Health and Safety:

Medical Hazardous Waste at the Project site generated from long standing (since 1960 -): old South Bay Hosp, MD offices, medical labs, surgical center, and etc.

☐☐☐-1 Medical waste contains infectious and potentially infectious materials(pathological products, blood, biological fluids, tissues, and etc.. This would be a major residential exposure due to the ground excavation, and demolition of the buildings. Biohazardous waste contains harmful microorganisms. Also, the possible exposure to certain cytotoxic drugs which were used since 1960 to present.

The above must be carefully regulated and licensed by DOT, EPA, OSHA and etc. Along with the need for constant monitoring of wind direction for hazardous air pollutants.

☐☐☐☐ The children's center at Flagler and Beryl St will be sitting on a old oil well. Hazard?

☐☐☐☐ 3. Traffic must not be routed down Del Amo and Beryl Streets due to the locations of 3 schools (Towers, West Hi & SouthBay Christian). Children will be exposed(inside an outside) to heavy truck traffic, fumes and other unknowns.

We the West Torrance residents will be exposed to heavy truck and heavy equipment all day long. This will not be SAFE for anyone in our areas.

☐☐☐☐ Traffic violations (speeding , disregard for traffic signals) resulting from the Project Who will be responsible for the extreme amount of traffic(Safety for school children and residents)for 15 +years.

☐☐☐☐ 4. Economic devaluation. CA real estate regulation notes: seller of property must notify buyer of the Project!. This Project will have devastating affect on are ability to sell our property. Fumes, noise, traffic,

☐☐☐☐ privacy and looking up at a monster of a structure.

Dr. Frank & Glenda Briganti

19616 Tomlee Ave

Torrance, CA 90503

July 29, 2019

Ramos, Ryan

From: EIR <eir@bchd.org>
Sent: Thursday, July 25, 2019 10:14 PM
To: Meisinger, Nick
Subject: Fw: Beach Cities Health District Project

From: chad butzine <chad.ascot@hotmail.com>
Sent: Tuesday, July 23, 2019 1:28 PM
To: EIR <eir@bchd.org>
Cc: Suzan Khani <suzankhani11@gmail.com>
Subject: Beach Cities Health District Project

To Nick Meisinger/ Environmental Planner

CB-1 My name is Chad Butzine. My wife, 2-year-old son and I currently reside at 5674 Towers St. Torrance, a home owned by my family that we have put great care and work into. It is with great concern that I address the environmental impacts of the proposed Beach Cities Health District Project and the dire environmental impacts the community and my family face from what appears to be a 2 decade health concern. My list of concerns are extensive but for the sake of practicality I have consolidated them into three main categories; Traffic/ Security, Air Quality and Noise Pollution.

CB-2 Firstly, the proposal will create a security risk for the surrounding community. The traffic in the surrounding areas already gridlocks when the multiple schools let out- The Beryl/ Flagler intersection is notorious for congestion and many accidents have occurred in and around this area. The blind turn from Flagler to Towers has sent several cars crashing into our driveway as well as injuring pedestrians and bicyclists. Children already race across the street to avoid the constant onslaught of drivers making the turn. Putting the entrance to a 350 unit complex here is utterly IMPOSSIBLE... the surrounding streets cannot support that amount of traffic. There are 3 major schools near the property and the additional traffic this would create is a traffic nightmare for over a square-mile when schools let out or during rush hour. The very idea that the area could handle a main entrance to a parking garage that could hold hundreds of vehicles is laughable and would create reckless gridlock and constant danger to pedestrians already plagued by the poor traffic in the area.

The alley immediately next to the property already serves as a blind area where homeless often congregate and often use the sight obstruction the alley provides to engage in illegal behavior. Our home and neighbors have all experienced burglary and trespassing. The alley is also a main channel for children to use on the way to and from school. Adding a network of construction zones near this alley will likely allow even more clandestine behavior in this alley. Adding acres of unattended nightly construction sights adjacent to this already problematic ally serves as a major security risk for the children and residents nearby. What are the beach cities planning for security when weekly security incidents are already happening in and around this alley?

CB-3 The plans for Health District Project are ambitious to say the least. Plans to do full demolition and on-site grinding will create a constant air quality problem for the surrounding area. I am asthmatic and have severe allergies and I will not be able to reside in my own home during the heavy demolition phases of this project. I and no one else in the community want their children breathing the mold and dust that go hand-in-hand with a construction project of this size. I and many other members of the community will have to relocate at this time. There is also great concern for asbestos and lead contaminating the area as well among the myriad of other possible contaminants. Rodent infestation during demolition is another major concern especially with recent outbreaks of Typhus in Los Angeles and Long Beach.

CB-4
CB-5 The final concern is that of pervasive noise pollution. For nearly 2 decades I and the surrounding neighborhood will enjoy the symphony of wrecking balls and cement trucks- all day, every day in 3 convenient phases. My son will grow up next to piles of concrete, steel beams and port-o-potties. All things considered its only reasonable for my family to move because of the detrimental environmental impacts we face living next door to the Beach Cities Health District Boondoggle and that is where this project does its final injustice to the community. The combination of environmental disasters directly from the project site will make our properties unlivable, un-sellable and un-rentable. Selling and relocating isn't even an option - Who would ever rent or purchase a home in the middle of a construction site and put up with the environmental impacts for 15 years? Absolutely no one. The value of every property in the neighborhood will plummet over the environmental impacts of the Beach Cities Health District DISASTER.

I implore with the utmost urgency that the Beach Cities Health District Project and Wood Environment and Infrastructure Solutions Inc, address these egregious environmental issues.

With Great Concern,
Chad Butzine
310-502-8568
BIZ 310-559-5959
5674 Towers St.
Torrance Ca 90503

Martinez, Oscar

From: Suzan Khani <suzankhani11@gmail.com>
Sent: Saturday, July 27, 2019 9:42 PM
To: Martinez, Oscar
Subject: BCHD proposed wellness living campus / debacle

WARNING: External e-mail

Please verify sender before opening attachments or clicking on links.

Regarding the EIR review

Mr. Nick Meisinger,

My name is Suzan K Butzine and I reside with my family at 5674 Towers Street directly next to the Flagler alley and directly under the proposed BCHD Healthy Living Campus site. Our home which we have had for many years is the closest and most impacted house to this proposed monstrosity of a project as it is the very first house next to the flagler alley on the Beryl street site. I am writing to express my very serious concerns about the impact this project will absolutely have on my home, my neighborhood, our health, our livelihood, our overall quality of life and most importantly my infant baby and unborn child. The areas of concern are pollution/toxicity, noise from demolition and construction, and dramatically and dangerously increased traffic into our neighborhood.

The proposed BCHD project is going to span the length of 15 years. Are you kidding me? 15 years of ongoing demolition and construction. This has got to be a joke. How can they put such a disgusting and crippling burden on this community? 15 years of direct air pollution on top of and into our homes, 15 years of construction and ear numbing noise, 15 years of heavy traffic due to demolition and construction. And that is not even taking into consideration the 1000 cars belonging to the residents, employees and visitors, which will spill out onto already busy and crowded streets and directly into our neighborhood.

Topic 1 - Air pollution /toxicity.

A project of this scale and length of time with the proposed demolition and construction in each of the 3 ridiculously long phases is absolutely going to produce a large amount of dust, debree, mold spores, lead paint particles and God knows what else that will be released directly onto, on top of and into my home. Fine particles of a multitude of chemicals and matter will spill onto my home, our yard, our cars, our roof and into our home. My baby who will be 3 years old when all of this starts and my unborn child that we were planning on having will breath this polluted air on a daily basis over the span of years and years. What should we do as parents when our children develop respiratory problems, asthma and worse cancer? I will hold BCHD, the city of Redondo Beach and the city of Torrance responsible. My husband also has asthma and he will be seriously affected. In the notice of preparation it describes that the EIR will expose sensitive receptors (me and my family) to substantial pollutant concentrations for the span of 15 years. It also states that this is a potentially significant impact. It then goes on to speak of the potential impact on the SCAB or rather the South Coast Air Basin and 15 million people who live within this area. Why I ask you is there nothing written about the impact on the residents of the homes directly around the site and most of all right next to it?

How will you monitor the air and pollution that will be affecting me and my home? Will you have sensors or air / particle collectors in place at my home to monitor? Should we put in place our own monitoring systems and have an independent company inform us of exactly what it is that we are breathing? How will you ensure that my family's health and my innocent sons health and my unborn child's health are not affected? And how is BCHD and the city of Torrance allowing us to be exposed to this for the span of 10-15 years? My son won't be able to play in his back yard as it will be covered with dust from concrete pulverization and asphalt demolitions etc. What about all the innocent children at Towers elementary? Are they going to be exposed to toxic air pollution, chemicals etc? Who's wellness is BCHD thinking of? Certainly only the wellness of their own pockets.

Topic 2 - Noise from each phase

Again, we are the house closest to the site and will suffer the loudest of the noise of constant demolition and construction FOR 10 to 15 YEARS!!!!!!!!!!!!!! Again, 10 to 15 years. This is astounding to me. 10 to 15 years. What hours and days will all and any work occur on the site? What about weekends? We could deal with and get through it if we had to if we knew it was for a year or two, but this will literally go on until my 1 year old son is out of high school. How will you monitor the vibration and sound my home and the homes directly around the site are subject to? What measures will be put in place to protect us and what steps will we as the most affected community be forced to take against BCHD and the City of Torrance, Redondo etc?

Topic 3 - Increased Traffic

There are three schools in the close vicinity of the site as well as residential homes. Our streets and homes in my neighborhood already experience a heavy volume of traffic which is worst during the school year and during morning and afternoon rush hour. How are you going to add another 500 - 1500 cars to this already overloaded neighborhood? Our home is directly on the corner of Towers and Flagler. Already we are constantly afraid of cars careening around our corner at a high speed. Children and families walk through the alley and are already in harms way at this intersection. There have been multiple accidents on our corner. Adding more traffic via the proposed underground entrance to parking at Flagler is a huge mistake.

It seems clear to me that this project proposed as a wellness center is nothing more than a money making ploy and BCHD is not thinking about the health and wellness of the community that is already living in the area.

Thank you,
Suzan K Butzine

Catherine Bem

From: Shannon Carter <bignavguns@yahoo.com>
Sent: Saturday, July 27, 2019 7:45 AM
To: EIR
Subject: Pickleball at New development

Follow Up Flag: Follow up
Flag Status: Flagged

All,

I have seen the articles and the news about the new complex being built. Pickleball is the fastest growing sport for all ages and it has a very large senior audience, as well as all ages. I live in Redondo and my wife is the local Ambassador for Pickleball and I am the District Ambassador for LA county.

We received a grant from Beach Cities when we built our permanent courts in Hermosa because they saw the positive side of exercise and preventative wellness.

I am wondering if there is room or even a consideration to have pickleball courts built around the new complex that your are undertaking?

Please feel free to contact me and about questions or any information that I can share with you about the positive results of Pickleball.

Thanks for your help and time with this matter.

Shannon.

Shannon Carter "Gunner"
LA Metro District Pickleball Ambassador
Certified Referee
Bignavguns@yahoo.com
703 438-0920

Ann Cheung
P. O. Box 14142
Torrance, CA 90503
July 26, 2019

BY FIRST CLASS MAIL AND E-MAIL (EIR@bchd.org)
Wood Environment & Infrastructure Solutions
9210 Sky Park Court
Suite 200
San Diego, CA 92123

Attention: Mr. Nick Meisinger, NEPA/CEQA Project Manager

Re: Public Comments on Proposed BCHD
Expansion Project

Dear Mr. Meisinger:

As a member of the public, and as a Torrance homeowner residing in the Pacific South Bay community (Tomlee Avenue), I am providing public comments to the above referenced project.

The BCHD expansion project as it stands is an unconscionable project in terms of its scope and negative construction impacts to the residents nearby, especially residents in the Pacific South Bay Community. The first phase of the project where 102 new assisted living units, two stories of underground parking and a child development center are to be constructed adjacent and
□□-1 | along Flagler Lane. **Flagler Lane belongs to the City of Torrance**; it is the West border of the
□□-□ | Pacific South Bay community. Though topographically lower than the existing BCHD facilities
(sparse in comparison to the proposed new development), residents in the community are able
to enjoy ocean breeze and fresh air. That is the predominant reason why majority of residents in
the community are either elderly, or young family with school children. The project as proposed
will completely decimate the quality of life for the residents. While my concerns for this project
are many, I like to call your attention to the following:

TRAFFIC

It is incredible that such a monstrous development can be sought to be developed in an already
crowded vicinity. One of the reasons reported for necessitating the new development is that
□□-□ | medical offices are relocating to newer buildings from the current BCHD center. Based on my
personal experience, the ease of getting in and out of the Center is an issue for visitors even
with the existing offices. If the new development plan is allowed to proceed; creating additional
assisted living units and two levels of subterranean parking structure, how long would it take to
exit out of the parking structure? to which street? The BCHD NOP indicated entrance to the new
assisted living units and parking structure will be through Flagler Lane. **That must be a
mistake!** Did BCHD clear this plan with the City of Torrance? The Pacific South Bay community
would not be able to sustain traffic during the construction phase with heavy trucks going to and
□□-□ | from the job site through Flagler Lane, and then post construction with traffic from visitors of the
BCHD residents, support and administration personnel, maintenance workers, etc. BCHD will
meet stiff resistance on the Flagler ingress/egress issue.

HEALTH

□□-□ Demolition of existing buildings most certainly will generate dust and unforeseen chemical particles harmful especially to children and our elderly residents. How does BCHD propose to contain construction pollutants from blowing down to the Pacific South Bay community? It is ironic that this project is sponsored by the Beach Cities Health District, for healthy living. Whose health is important? Health hazard is a top concern among the Torrance residents. What is the BCHD plan in addressing health risks associated with the project to local residents?

NOISE

□□-□ Many residents in the Pacific South Bay community are caught off guard that any government agency would permit this multigenerational center be developed in a densely populated area and built over such a lengthy period (12 years or longer)? Who can endure the building demolition, ground excavation, earth compacting and construction noise for years? What would the construction noise and vibration do to our property values should our residents need to sell? I also wonder why is there a stretch-out in between the development phases? Is the design well thought out? Or is it a funding issue that is extending the project life and therefore local residents' agony? Perhaps BCHD needs to secure funding for the entire project before even starting the project?

□□-□ If the premise for Phase I development hinges on Flagler Lane for ingress/egress to the new assisted living units and the subterranean parking structure, it is not a viable plan. The Torrance residents will exhaust all avenues to deter the project from moving forward. Personally speaking, I understand the need of BCHD to develop this piece of property; it is a piece of prime real estate. However, BCHD needs to rescope/descope the project so that access to the new facilities could be sustained through Redondo Beach routes rather than incumbering the Pacific South Bay residents.

Thank you for your consideration.

Ann Cheung



City Hall 1400 Highland Avenue Manhattan Beach, CA 90266-4795
Telephone (310) 802-5500 FAX (310) 802-5501

July 25, 2019

Mr. Nick Meisinger
Wood Environment & Infrastructure Solutions, Inc.
Environmental Planner
9210 Sky Park Court, Suite 200
San Diego, CA 92123
EIR@bchd.org

RE: Notice of Preparation- Beach Cities Health District Healthy Living Campus Master Plan (Beach Cities Health District)

Dear Mr. Meisinger,

The City of Manhattan Beach Community Development Department appreciates the opportunity to provide comments on the Notice of Preparation for the Beach Cities Health District Healthy Living Campus Master Plan. We do not have any specific comments at this time.

TF-1

Thank you for your consideration and we look forward to receiving the Draft EIR. We reserve the right to make comments on the Draft EIR once it is published. Should you have any questions please feel free to contact the City's Traffic Engineer Erik Zandvliet at (310) 802-5522 or at ezandvliet@citymb.info; or me at (310)-802-5512 or tfaturos@citymb.info.

Sincerely,

Ted Faturos
Assistant Planner

xc: Anne McIntosh, Director of Community Development
Laurie Jester, Planning Manager
Erik Zandvliet, Traffic Engineer

Fire Department Address: 400 15th Street, Manhattan Beach, CA 90266 FAX (310) 802-5201
Police Department Address: 420 15th Street, Manhattan Beach, CA 90266 FAX (310) 802-5107
Public Works Department Address: 3621 Bell Avenue, Manhattan Beach, CA 90266 FAX (310) 802-5301

July 16, 2019

Mr. Nick Meisinger, Environmental Planner
Wood Environment & Infrastructure Solutions, Inc.
9210 Sky Park Court, Suite 200
San Diego, CA 92123
EIR@bchd.org

RE: Notice of Preparation of an Environmental Impact Report for the Beach Cities Health District Healthy Living Campus Master Plan Review and Comments

Dear Mr. Meisinger:

WB-1 On behalf of the City of Redondo Beach, California, please accept this letter as the City's official written comments in response to the Notice of Preparation/Initial Study for the Beach Cities Health District (BCHD) Healthy Living Campus Master Plan. The City respectfully submits these comments to BCHD, as the Lead Agency for the project, for consideration in the scope and content of the environmental analysis to be included in the Environmental Impact Report (EIR).

WB-2 BCHD has proposed a multiphase development which generally includes a new Residential Care Facility for the Elderly (RCFE) and assisted living, a new Child Development Center, a Community Wellness Pavilion, which includes BCHD staff offices, a demonstration kitchen, meeting rooms, a café, space for potential medical offices/research or similar uses, and new parking facilities on approximately 10.38 acres. The project proposes this redevelopment to occur over three 36 month-long phases over a duration of 15 years.

WB-3 It is suggested that BCHD further refine the project description in the EIR. The NOP project description states that there will be an increased number of units for assisted living that exceeds what exists currently on the site. The existing site has 60 memory care units, with up to 120 residents (2 residents per room). The project proposes an additional 360 units for assisted living. However, the total number of proposed residents at buildout is unclear. Please clarify the anticipated number of residents upon completion of the proposed project and any alternatives. It is also recommended that the project incorporate recreational opportunities for the general public, as well as providing prominent and direct pedestrian access from Prospect Avenue into the planned active green space. Trails around and through the project should also be incorporated. BCHD should also maintain public services and access during different phases of construction.

WB-4

WB-5 The Initial Study prepared for BCHD Healthy Living Campus Master Plan identified potentially significant impacts which will be addressed in the EIR, including Aesthetics, Air Quality, Cultural Resources, Tribal Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise and Vibration, Population and Housing, Public Services, Transportation, and Utilities and Service Systems. The Initial Study has also proposed additional analysis for some thresholds related to Biology. When evaluating these resource areas, the City requests that BCHD consider the following when evaluating impacts of the proposed project:

WB-6 • **Aesthetics.** The City recommends that the aesthetics analysis consider multiple locations within surrounding residential neighborhoods to the south, west, and east, including a comparison of the existing and proposed visual character, including consideration of the project's massing.

WB-7 • **Cultural Resources.** BCHD should consider whether the project requires any review by the Redondo Beach Historic Preservation Commission or other historical review agency. Pursuant to AB 32 early consultations with local Native American Tribes should be ongoing and included within the EIR.

WB-8 • **Hydrology and Water Quality/Geology and Soils.** The proposed project will have increased square footage and changes in the site contours. The project site currently has slopes ranging from 0 to 15 percent, with particularly steep slopes on the eastern boundary. The City requests that the EIR address the adequacy of drainage, erosion, and stormwater controls to ensure that the surrounding neighborhoods are not adversely affected from the modifications proposed by the project.

WB-9 • **Noise and Vibration.** The sound and vibration expected during construction and operation should be taken into consideration when assessing potential impacts, including but not limited to events planned at the proposed Wellness Pavilion and Open Space area.

WB-10 • **Transportation.** The proposed project includes a 227% increase in building square footage from existing conditions (260,900 sf existing and 592,700 sf proposed). The EIR should consider circulation during construction (on site and in vicinity), and circulation during operation (on site and in vicinity).

WB-11 In addition to the environmental issues listed above, the City requests that BCHD consider the following land use and planning comments related to project. As noted in the Initial Study, BCHD is required to obtain a Conditional Use Permit (CUP) and Planning Commission Design Review from the City of Redondo Beach to implement the proposed project. As discussed in the criteria below, BCHD may also need to submit a Landscape and Irrigation Plan (RBMC 10-2.1900), as well as an application for Sign Review (RBMC § 10-2.1800 et seq), and permits

WB-11
cont.

related to the Building Division, Engineering Division, and Business Licensing. Additionally, if there are improvements required in a municipality's right of way, permits may be required for that work from the Engineering Department of the respective municipality or Caltrans.

WB-12

While vehicular Level of Service (LOS) is being phased out from CEQA pursuant to Senate Bill 743, the City requests that BCHD consider the project's effects on vehicular LOS, from at least a planning perspective. The Project also proposes a decrease in parking from 814 existing parking spaces to 690 parking spaces. BCHD should also ensure that it is able to demonstrate compliance with the City's parking standards discussed under RBMC § 10-2.1700 et seq., including providing adequate parking during all phases of the project, particularly during the first phase where the existing lot will be demolished. BCHD should also clarify whether it is requesting approval for shared parking during any of the project phases. (See RBMC § 10-2.1700(d).)

WB-14

The City also requests that BCHD condition the project approval upon preparation and implementation of a Construction Management Plan (CMP). The City of Redondo Beach traditionally requires a CMP as a standard condition of approval for projects similar to the BCHD project. An example of such a plan is included as Condition COA TRA-1 which was required for the South Bay Galleria Project approved in January 2019. (Redondo Beach Resolution No. 1901-004, p. 27.)¹

WB-15

The South Bay Galleria CMP required: (a) A flagman shall be placed at the truck entry and exit from the project site at the times trucks are present, (b) To the extent feasible, deliveries and pick-ups of construction materials shall be scheduled during non- peak vehicular travel periods to the degree possible and coordinated to reduce the potential of trucks waiting to load or unload for protracted periods of time, (c) Access shall remain unobstructed for land uses in proximity to the project site during project construction, (d) Minimize lane and sidewalk closures to the extent feasible. In the event of a temporary lane or sidewalk closure, a worksite traffic control plan, approved by the City of Redondo Beach, shall be implemented to route traffic, pedestrians, or bicyclists around any such lane or sidewalk closures, (e) Minimize interruptions to transit services and facilities. In the event that a temporary removal or relocation of a bus stop is necessary, coordination with Metro and other affected transit operators shall occur to ensure that any such action is consistent with the transit operator's needs, (f) The applicant shall coordinate with Metro and other turnaround loop transit operators at least 30 days in advance of right-of-way construction work to ensure that any such construction activities are consistent with maintaining the transit services' operations, (g) This CMP shall be developed by the contractor prior to the issuance of building permits, reviewed for consistency with this measure, and approved by the Community Development and Public Works Departments of the City of Redondo Beach. In addition to the measures identified above, the CMP shall include the following: (i) Schedule vehicle movements to ensure that

¹ Redondo Beach Resolution No. 1901-004 is available online at:
<http://laserweb.redondo.org/weblink/0/doc/328627/Page1.aspx>

WB-15
cont.

there are no vehicles waiting off site and impeding public traffic flow on the surrounding streets, (ii) Establish requirements for the loading, unloading, and storage of materials on the project site, (h) Coordinate with the City and emergency service providers to ensure adequate access is maintained to the project site and neighboring businesses.

WB-16

The following discussion outlines some of the City of Redondo Beach's zoning regulations for the project site, as well as a discussion of the entitlement criteria for the CUP and Design Review. To the extent that the EIR does not address some of the CUP and Design Review criteria, BCHD should be prepared to provide additional evidence as part of the project's entitlement process/applications.

Applicable Zoning Criteria of Public and Institutional Zone (P-CF) and Commercial Zone (C-2)

The BCHD Healthy Living Campus Master Plan is located largely upon a property zoned P-CF (Public and Institutional – Community Facility). BCHD should be aware of the specific purposes of this zone listed in the Redondo Beach Municipal Code (RBMC) § 10-2.1100, and the BCHD Healthy Living Campus Master Plan should comply with the RBMC § 10-2.1116 Development standards: P-CF community facility zone as noted below:

WB-17

- (a) Floor area ratio. The floor area ratio shall be determined subject to Planning Commission Design Review.
- (b) Building height. Height of buildings or structures shall be determined subject to Planning Commission Design Review.
- (c) Stories. The number of stories of any building shall be determined subject to Planning Commission Design Review.
- (d) Setbacks. Setbacks shall be determined subject to Planning Commission Design Review.
- (e) General regulations. See Article 3 of this chapter.
- (f) Parking regulations. See Article 5 of this chapter.
- (g) Sign regulations. See Article 6 of this chapter.
- (h) Landscaping regulations. See Article 7 of this chapter.
- (i) Procedures. See Article 12 of this chapter.

WB-18

Additionally, the BCHD Healthy Living Campus Master Plan includes a parcel located at the southeast corner of Beryl Street and Flagler Lane that is zoned C-2 (Commercial). For that portion of the project site located on the C-2 zoned property, BCHD should be aware of the specific purposes of this zone listed in the RBMC § 10-2.600, and the BCHD Healthy Living Campus Master Plan should comply with the RBMC § 10-2.622 Development standards: C-2 commercial zone as noted below:

WB-19

(a) Floor area ratio. The floor area ratio (F.A.R.) of all buildings on a lot shall not exceed 0.5 (see definition of floor area ratio in Section 10-2.402).

(b) Building height. No building or structure shall exceed a height of thirty (30) feet (see definition of building height in Section 10-2.402).

(c) Stories. No building shall exceed two (2) stories (see definition of story in Section 10-2.402).

(d) Setbacks. The minimum setback requirements shall be as follows:

(1) Front setback. There shall be a minimum front setback of five (5) feet the full width of the lot, except where a lot is contiguous to a residentially zoned lot fronting on the same street, in which case the required front setback shall be the same as required for the contiguous residential lot.

(2) Side setback.

a. There shall be a minimum side setback of ten (10) feet the full length of the lot on the street side of a corner or reverse corner lot.

b. No side setback shall be required along the interior lot lines, except where the side lot line is contiguous to a residential zone, in which case the following standards shall apply:

1. There shall be a minimum side setback of twenty (20) feet the full length of the lot;

2. The required side setback may be modified pursuant to Planning Commission Design Review (Section 10-2.2502).

(3) Rear setback. No rear setback shall be required, except where the rear lot line is contiguous to a residential zone, in which case the following standards shall apply:

a. There shall be a minimum rear setback of twenty (20) feet the full width of the lot;

b. The required rear setback may be modified pursuant to Planning Commission Design Review (Section 10-2.2502).

(e) General regulations. See Article 3 of this chapter.

(f) Parking regulations. See Article 5 of this chapter.

WB-19
cont.

- (g) Sign regulations. See Article 6 of this chapter.
- (h) Landscaping regulations. See Article 7 of this chapter.
- (i) Procedures. See Article 12 of this chapter.

Entitlement Criteria at Planning Commission

- Redondo Beach Municipal Code § 10-2.2506(b) Conditional Use Permits:

(b) **Criteria.** The following criteria shall be used in determining a project's consistency with the intent and purpose of this section:

(1) The site for the proposed use shall be in conformity with the General Plan and shall be adequate in size and shape to accommodate such use and all setbacks, spaces, walls and fences, parking, loading, landscaping, and other features required by this chapter to adjust such use with the land and uses in the neighborhood.

(2) The site for the proposed use shall have adequate access to a public street or highway of adequate width and pavement to carry the quantity and kind of traffic generated by the proposed use.

(3) The proposed use shall have no adverse effect on abutting property or the permitted use thereof.

(4) The conditions stated in the resolution or design considerations integrated into the project shall be deemed necessary to protect the public health, safety, and general welfare. Such conditions may include, but shall not be limited to:

- a. Additional setbacks, open spaces, and buffers;
- b. Provision of fences and walls;
- c. Street dedications and improvements, including service roads and alleys;
- d. The control of vehicular ingress, egress, and circulation;
- e. Sign requirements or a sign program, consistent with the Sign Regulations Criteria in Section 10-2.1802;
- f. Provision of landscaping and the maintenance thereof;
- g. The regulation of noise, vibration, odor and the like;

WB-20

WB-20
cont.

- h. Requirements for off-street loading facilities;
- i. A time period within which the proposed use shall be developed;
- j. Hours of permitted operation and similar restrictions;
- k. Removal of existing billboards on the site, subject to the findings required by Section 10-2.2006(b)(7); and
- l. Such other conditions as will make possible the development of the City in an orderly and efficient manner and in conformity with the intent and purposes set forth in this chapter and the General Plan.

WB-21

• Redondo Beach Municipal Code § 10-2.2502(b) Planning Commission Design Review:

(b) **Criteria.** The following criteria shall be used in determining a project's consistency with the intent and purpose of this section:

(1) **User impact and needs.** The design of the project shall consider the impact and the needs of the user in respect to circulation, parking, traffic, utilities, public services, noise and odor, privacy, private and common open spaces, trash collection, security and crime deterrence, energy consumption, physical barriers, and other design concerns.

(2) **Relationship to physical features.** The location of buildings and structures shall respect the natural terrain of the site and shall be functionally integrated with any natural features of the landscape to include the preservation of existing trees, where feasible.

(3) **Consistency of architectural style.** The building or structure shall be harmonious and consistent within the proposed architectural style regarding roofing, materials, windows, doors, openings, textures, colors, and exterior treatment.

(4) **Balance and integration with the neighborhood.** The overall design shall be integrated and compatible with the neighborhood and shall strive to be in harmony with the scale and bulk of surrounding properties.

(5) **Building design.** The design of buildings and structures shall strive to provide innovation, variety, and creativity in the proposed design solution. All architectural elevations shall

WB-21
cont.

be designed to eliminate the appearance of flat façades or boxlike construction:

a. The front façade shall have vertical and horizontal offsets to add architectural interest to the exterior of the building and where possible, bay windows and similar architectural projections shall be used.

b. The roof planes of the building, as well as the building shape, shall be varied where feasible, and a visible and significant roof line shall be used to soften the vertical mass.

c. Harmonious variations in the treatment or use of wall materials shall be integrated into the architectural design.

(6) **Signs.** Signs and sign programs shall meet the criteria established in Sign Regulation Criteria, Section 10-2.1802.

(7) **Consistency with residential design guidelines.** The project shall be consistent with the intent of residential design guidelines adopted by resolution of the City Council.

(8) **Conditions of approval.** The conditions stated in the resolution or design considerations integrated into the project shall be deemed necessary to protect the public health, safety, and general welfare. Such conditions may include, but shall not be limited to:

- a. Changes to the design of buildings and structures;
- b. Additional setbacks, open spaces, and buffers;
- c. Provision of fences and walls;
- d. Street dedications and improvements, including service roads and alleys;
- e. The control of vehicular ingress, egress, and circulation;
- f. Sign requirements or a sign program, consistent with the Sign Regulations Criteria in Section 10-2.1802;
- g. Provision of landscaping and the maintenance thereof;
- h. The regulation of noise, vibration, odor and the like;
- i. Requirements for off-street loading facilities;

WB-21
cont.

- j. Removal of existing billboards on the site, subject to the findings required by Section 10-2.2006(b)(7);
- k. Such other conditions as will make possible the development of the City in an orderly and efficient manner and in conformity with the intent and purposes set forth in this chapter and the General Plan.

These comments have been reviewed and approved by the Redondo Beach City Council at their July 16, 2019 public meeting. If BCHD has any questions regarding these comments, please contact Community Development Director Brandy Forbes at (310) 318-0637 x2200 or via email at brandy.forbes@redondo.org. Thank you for the consideration of our comments.

Sincerely,

Mayor William Brand

CC: City Council Members, City of Redondo Beach
Joe Hoefgen, City Manager
Brandy Forbes, Community Development Director



CITY OF TORRANCE

COMMUNITY DEVELOPMENT DEPARTMENT

DANNY E. SANTANA
COMMUNITY DEVELOPMENT
DIRECTOR

July 29, 2019

Mr. Nick Meisinger, Environmental Planner
Wood Environment & Infrastructure Solutions, Inc.
9210 Sky Park Court, Suite 200
San Diego, CA 92123
EIR@bchd.org

RE: Beach Cities Health District (BCHD) Healthy Living Campus Master Plan

Dear Mr. Meisinger,

RE: Notice of Preparation (NOP) Review and Comments & Scoping Meeting for the Beach Cities (BCHD) Healthy Living Campus Master Plan

The City of Torrance appreciates being notified of the release of the Notice of Preparation (NOP) Review and Comments & Scoping Meeting for the "Beach Cities (BCHD) Healthy Living Campus Master Plan" and that an Environmental Impact Report is necessary to comply with the California Environmental Quality Act.

The City of Torrance Community Development Department would like to ensure that the Draft Environmental Impact Report analyze the following:

- 1) Aesthetics/Assess the new placement and continuous structure designs and potential impacts to residents to the east and southeast from a scenic and lighting perspective.
- 2) Air Quality/Identify all haul routes, delivery/staging routes including soils remediation and oil well re-abandonment. Assess the potential construction and operating impacts to the sensitive receptors to Torrance residential communities, public/private schools, Large Family Daycares (LFDs), and City facilities within a mile radius of identified routes.
- 3) Biology/Further define the placement of improvements and assess the potential conflicts with City of Torrance Ordinances/Policies for portions of the site and proposed right-of-way areas that exist within the City of Torrance jurisdictional boundaries with all proposed construction activities, including buildings and walls, proposed slope modifications along the west side of Flagler and any streetscape modifications for the conceptual bike lanes.
- 4) Hazards and Hazardous Materials/ Assess the potential construction and operating impacts to the sensitive receptors to Torrance residential communities, public/private schools, Large Family Daycares (LFDs), and City facilities within a mile radius of identified routes.
- 5) Noise and Vibration/ Identify all demolition, grading and construction haul routes, delivery/staging routes including soils remediation and oil well re-abandonment and

operational aspects that may include permanent noise/vibration sources. Assess the potential construction and operating impacts to the sensitive receptors to Torrance residential communities, public/private schools, Large Family Daycares (LFDs), and City facilities within a mile radius of identified routes.

- 6) Transportation/Assess potential traffic impacts at each phase of development under ICU and HCM methodology for LOS for combined operations, construction parking analysis, haul/delivery routes with schools in session. *A project is considered to impose significant traffic impacts when the following conditions are met:*

Signalized Intersections (ICU Methodology)	
Pre-project LOS	Project V/C Increase
C	0.04 or more
D	0.02 or more
E/F	0.01 or more

Unsignalized Intersections	
Existing + Ambient Growth + Project HCM Methodology LOS	Signal Warrant Analysis Result
Degrades to E or F	Traffic signal is warranted

Two-Lane Residential Streets	
Projected ADT with Project	Project-Related Increase in ADT
0 to 999	120 or more
1,000 to 1,999	12% or more or final ADT
2,000 to 2,999	10% or more or final ADT
3,000 or more	8% or more or final ADT

Furthermore, analyze the impacts associated with accessing the parking structure off Flagler Lane (single entry point). Analyze impacts as if this were always to be the case. Full internal circulation should be required to avoid unnecessary roadway trips triggered by lack of on-site circulation/connectivity. Any permits from the City of Torrance in regards to roadway improvements are contingent on underlying fee ownership of Flagler Lane/Alley. Lastly, applicants shall contact the Public Works Department, Engineering Division at (310) 781-6900 prior to initiating any TIA. Applicants shall use the County of Los Angeles Department of Public Works "Traffic Impact Analysis Report Guidelines" dated January 1997 for general TIA format and requirements with the exception of two-lane residential roadways, which shall be assessed in general conformance with Section 2.3 of the City of Los Angeles Department of Transportation "Transportation Impact Study Guidelines" dated December 2016. Traffic growth forecasts shall use a 0.525% annual growth rate. The City reserves the right to modify the requirements of the TIA as needed to fully assess the impact of the proposed project. The following intersections shall be analyzed:

Intersections		
190 th St / Beryl St	190 th St / Flagler Ln	190 th St / Entradero Ave
190 th St / Anza Ave	190 th St / Hawthorne Blvd	190 th St / Inglewood Ave
Flagler Ln / Beryl Ave	Del Amo Blvd / Prospect Ave	Del Amo Blvd / Wayne Ave
Del Amo Blvd / Anza Ave	Del Amo Blvd / Victor St	Del Amo Blvd / Henrietta St
Torrance Blvd / Prospect Ave	Del Amo Blvd / Entradero Ave	Del Amo Blvd / Hawthorne Blvd
Anza Ave / Hallison St		

- 11 | 7) Cultural Resources & Tribal Cultural Resources/Assess potential impacts to Tribal and Cultural Resources based on SB18/AB52 requirements as they do not appear to have been included in the Initial Study.
- 1□ | 8) Alternatives/Include in the alternatives scenarios (1) a reduced scale scenario consisting of the removal of two full levels/stories from all proposed structures and (2) a reduced scale scenario with a modified placements to the west along Prospect, rather than Flagler, and access to Beryl rather than Flagler.

In addition, the City of Torrance Public Works Department has provided the following comments:

Wood Project Site Figure 2 (NOP p. 8)

□□-1□ | The City boundary line is shown incorrectly. This line should be corrected to show the entire Flagler Street Right-of-way within the City of Torrance and prolonged to the south to meet the line adjacent to Diamond Street.

Existing Site Access And Circulation (NOP p. 10-12)

□□-1□ | The description of Beryl Street should be expanded. To the west of Flagler Lane, Beryl is a one-lane street going westbound. However, Beryl has two lanes going eastbound with a trap right-turn pocket at Flagler Lane. Beryl Street east of Flagler lane should be included in the analysis due to its potential to be used as worker access and material haul routes. A description of Beryl east of Flagler should also be included indicating it is one lane in each direction with a class II bike lane in each direction and significantly narrower than west of Flagler. It should also be emphasized that there is currently no access to the project site from Flagler Lane.

Significant Environmental Resource Area: Recreation (NOP p. 25)

□□-1□ | Pedestrian and cyclist routes will be affected depending on haul truck routes and street and alley closures. Therefore, the Recreation box should be checked to indicate that this is an Environmental Resource Area that is Potentially Affected by the Healthy Living Campus Master Plan. BCHD can determine the level of potential impact. Furthermore, the EIR scope for this Area should include those pedestrians, students, and cyclists traveling from the east of the Project site.

Significant Environmental Resource Area: Transportation (NOP pp. 60-61)

□□-1□ | It is understood that the EIR will include a Traffic Study of the areas surrounding the Project Site, including the traffic in the adjoining Torrance neighborhoods. Beryl Street and these neighborhoods are affected by school traffic related to Towers Elementary School. Traffic counts for the Traffic Study must be conducted while school is in session.

□□-1□ | The Traffic analysis on City of Torrance Streets should be according to Torrance traffic Impact analysis (TIA) guidelines.

□□-1□ | The location, timing and methods to be used for dropping-off and picking up children at the Child Development Center should be identified. The EIR should describe the potential impact on the roadway where this drop-off and pick-up activity is to take place.

□□-1□ | Because the proposed Project may result in the development of a new entry to the subterranean parking lot along Flagler Lane, the EIR must clarify that its reference to "on-street parking spaces" indicates that it will assess the potential impacts of parking by construction workers and RCFE/BCHD employees traveling to the Project site as well as construction vehicles and equipment and construction materials deliveries to the area. The analysis should also take into account the likelihood that RCFE/BCHD employees, Center for Health and Fitness users, RCFE residents and families may find it convenient or necessary (particularly when the Campus

□□-1 □□□□□□□□
parking structure is full or before it is completed) to park in the adjoining Torrance residential neighborhood. This is in addition to the study of required temporary lane closures and sidewalk closures. The EIR should also determine the impact of the foregoing on pedestrians, cyclists, students and other existing users of Flagler Lane and Flagler Alley during the 15 year construction project.

□□-□□
□□-□1
Because the EIR is assuming the proposed Project would result in the development of a new entry to the Campus along Flagler Lane which is in the City of Torrance, the scope and methods of the Project-specific Traffic Study and associated EIR analysis must be made with direct input from both the City of Redondo Beach and the City of Torrance. Furthermore, the EIR should discuss different alternatives to reduce or eliminate through traffic, parking, noise, and pollution to the Torrance Neighborhood arising from that entry and exit. Such alternatives might include traffic diversion features toward Beryl Street and through traffic reduction or elimination barriers, which have been used on other Torrance roadways.

□□-□□
As Flagler Lane is 100% within the jurisdiction of the City of Torrance and Torrance has discretionary control over this segment of roadway. There is currently no vehicular access to private properties on Flagler Lane between Beryl Street and Towers Street. The project should consider an alternative that addresses the potential for no access from Flagler Street. The analysis with and without Flagler Lane alternatives should be addressed in the TIA.

Should you have any further questions of staff please do not hesitate to contact me at 310-618-5990.

Sincerely,

Danny E. Santana
Community Development Director

By 
Oscar Martinez
Acting Planning Manager

Attachments:

1. Correspondence

Cc: Torrance Mayor, City Council, City Manager, City Attorney, Public Works

From: EIR <eir@bchd.org>
Sent: Friday, August 02, 2019 1:51 PM
To: Meisinger, Nick
Subject: Fw: NO PROJECT! As Billy Idol musician sings: "START AGAIN".....

From: Melanie Cohen <melaniecohen372@gmail.com>
Sent: Monday, July 29, 2019 1:43 PM
To: EIR <eir@bchd.org>; HLCInfo <HLCInfo@bchd.org>
Subject: NO PROJECT! As Billy Idol musician sings: "START AGAIN".....

eir@bchd.org and ask them info stated above:hlcinfo@bchd.org.

M□-1 The Beach Cities Health District has taken on a project SO HUGE in scale as to cause an environmental and financial nightmare for the South Bay achieving JUST the opposite of their mission statement :To enhance community health through partnerships, programs and services for people who live and work in Hermosa, Manhattan and Redondo Beach. How is the Healthy Living Campus project within the scope of the mission statement? How was this project decided? According to a recent Daily Breeze article, the 450+ assisted living units was deemed necessary by a “marketing “ survey and a Gallup poll . Where is this information available to view?? Where will the 50 million dollar bond come from to pay for this project?? Will it be SHARED by all three Cities? Who will be the ADMINISTRATOR of the Project? Redondo Beach **already** has 60+ Alzheimer beds in the Silverado at BCHD currently. There are also 130 Alzheimers beds in a new unit on PCH and Knob Hill as well as various beds elsewhere in Redondo . There are 8 OTHER Senior living facilities in Redondo Beach that also have some assisted living units. The project is slated to extend over M□-□ 15 years . As you know, this is just an estimate because things can and DO cause delays. *Imagine* LOSS of traffic ingress and EGRESS for 15+ years and ITS effect on M□-□ EVERY intersection from 190th st on the North of Redondo Beach to Torrance Blvd on the southern end and of course EVERY intersection in between. Not to mention the 911 calls. M□-□ The Redondo Beach Fire department has made 321 calls this year to the Silverado. FREE OF CHARGE!! Can you IMAGINE the noise and the calls with an increase of 450+ units???

M□-□ Please, for the good that Beach Cities Health District has done over the years for our beach communities and Redondo Beach please opt for NO project and THIS TIME start slowly and see WHAT is necessary for Redondo Beach and its neighbors.

Melanie Cohen 26 year resident

115 S Guadalupe Avenue Unit H , Redondo Beach, Ca 90277 310-3744284

Ramos, Ryan

From: EIR <eir@bchd.org>
Sent: Thursday, July 25, 2019 10:32 PM
To: Meisinger, Nick
Subject: Fw: Proposed Construction at 514 N. Prospect Ave, Redondo Beach

From: Stevan Colin <stevan.colin@gabriel-law.com>
Sent: Wednesday, July 24, 2019 10:39 AM
To: EIR <eir@bchd.org>
Subject: Proposed Construction at 514 N. Prospect Ave, Redondo Beach

Good Morning: This is Stevan Colin, resident of Redondo Beach District Three Council district. Please address the environmental effect on residents of Redondo Beach and Torrance with respect to the effects (i.e. Traffic, construction vehicles, asbestos removal, hazardous dust, names of streets to be used to removed construction demolition and transport building materials into the site) of concurrent demolition and construction of the BCHD project and the demolition and construction of the AES power plant on Harbor Drive. Please also address what information your report will rely upon that shows a need for such assisted living residences in Redondo Beach, and address why no other sites outside of Redondo Beach have been considered for construction of the proposed project. Please address the zoning of the site (C-PF) and what projects are allowed to be constructed on the site. Please address whether the corner lot at Flagler and Beryl will require a change in zoning from commercial to some other zoning change, and whether that change will require a vote of the residents of Redondo Beach. Please address the anticipated calls for service for the number of residents anticipated in the proposed project, and the anticipated costs for Fire Department personnel (including paramedics). Please review the number of calls for service for BCHD's current facility, Silverado, summarize this information in your EIR, and state the anticipated increase in calls for service, especially for dementia afflicted residents at the proposed facility. Please review the history of Proposition FF that was voted on by Redondo Beach residents and residents' views on extending Flagler Lane around the current BCHD site to Diamond Street and Prospect Avenue. Please also address the issue of who is paying for the EIR being performed by all consultants relating to this project. Please acknowledge the current facilities of the BCHD site which have not been rented or leased, and what terms have been offered to medical facilities or practitioners to rent or lease said premises. Please state whether the cities of Hermosa Beach or Manhattan Beach are assisting in the payment of the EIR cost. Please also address the monthly cost of the residences for future patients, in comparison to the costs at The Kensington and The Sunrise. Please address where the money is coming from to pay for the consultants, and who will finance the construction of the proposed project. Please also address the cost of the proposed projects (all phases), and the financing mechanism to be employed by the BCHD or some other agent or partner of the District. Please also address whether the BCHD anticipates buying the current Vons Market site on Beryl Street and whether that acquisition will be a part of the currently proposed project. Please also address the health hazard remediation methods to be used to clean the commercial lot at Flagler and Beryl Street.

Thank you
Steven Colin, Esq., 801 Pacific Avenue, Long Beach, Calif. 90813

From: EIR <eir@bchd.org>
Sent: Friday, August 02, 2019 1:38 PM
To: Meisinger, Nick
Subject: Fw: BCHD - EIR Public Comments Att Nick Meseinger

From: Wayne Craig <wayne@waynecraighomes.com>
Sent: Monday, July 29, 2019 10:30 AM
To: EIR <eir@bchd.org>
Subject: BCHD - EIR Public Comments Att Nick Meseinger

Serious issues need to be addressed in the proposed Beach Cites District Environmental Impact Report.

While I could mention more, due to the short time period to respond publically I have limited my comments to the following areas:

Traffic

Impact on Redondo Beach City Fire and Emergency Services

Simultaneous Regional Construction Projects

Environmental Health Concerns

Traffic

The area currently experiences poor traffic and any change will exacerbate an already bad situation. The report should examine the impact before, during, and after the construction of the proposed project to accurately inform the public of what to expect. The study should not use outdated statistics and technical methods to determine the current traffic load as was done with the QIC project at the Galleria. In that case the study was several years old and didn't take in account the decrease in current traffic volume after the mall lost major department stores such as Nordstrom. That report erroneously stated traffic would not increase from current loads but failed to mention that was based on a report from several years earlier. Therefore the actual increase would be much more significant than what was portrayed.

Before Construction

Virtually all of the streets used to access the current facility site experience heavy traffic. These would include Prospect Blvd, Beryl Street, Del Amo Blvd, Pacific Coast Highway, and 190th. Each is used to service the community in normal commuter traffic to employment centers outside of the city as well as for children to access schools.

Currently the area already has poor traffic circulation during prime commute times and when schools are in session. By my count there are at least 7 public and one private school that will be impacted. These include Beryl Heights Elementary, Perras Middle School, Redondo Union High School, Redondo Shores, Jefferson Elementary, Towers Elementary, West High School, and Our Lady of Guadalupe School. There are also 4 community parks in the immediate area that include Dominguez Park, Entradero Park, and Sunnyglen Park.

Cut through traffic has already been identified as a problem by the adjacent community in Redondo Beach and should also be addressed in this study. The residents need to know how the project will impact them as recently the homes directly west of BCHD in Redondo Beach implemented traffic mitigation steps that will be completely negated by the project. The study needs to address this as well as the potential for an increase in injury accidents for children going to and from schools.

During Construction

With such a massive project that could take place over an estimated 15 years the community will be seeing heavy equipment and deliveries for a generation. Obviously this will impact the schools and commuters during peak times. It should not be averaged to show what it would be across a 24 hour period but instead show the real number during peak commute times. Since this number will change year by year it may be necessary to detail the impact with a new and revised EIR report as each phase is proposed for public approval.

After Completion

With an estimated 420 units of elder care that could house in excess of 600 people will require a substantial medical staff. By some estimates this could be at least 150 staff and with crew changes this will overlap during shift changes. Obviously this will permanently increase traffic and should be identified along with methods to mitigate.

2. Impact On Redondo Beach Fire and Emergency Services

Building 420 assisted care units as proposed will create a serious drain on Redondo Beach emergency services. This will result in increased response times across the city and a disproportionate financial impact to the City of Redondo Beach. Fire department personnel reported each call currently requires a crew compliment of 5 Redondo Beach FD staff (2 Paramedics, and 3 on an Engine) with 2 more non RBFD personnel in an ambulance. On occasion the Fire Department staff may also be required to follow an ambulance to the hospital which can take up to 45 minutes. This activity takes crews out of service for an extended period of time, puts increased strain on existing resources, and will negatively impact response times.

Silverado which is currently located on site has a population of around 100 residents. With the proposed increase of 5 or 6 times more residents will place a major drain on city services. This could by some estimates increase the call load to the Redondo Beach Fire Department by up to 8% per year. The net result will clearly negatively impact response times and cost the city additional money it currently has no budget to cover.

A great example of potential call load can be seen from the Kensington Memory Center on Pacific Coast Highway that opened on 7/11/19. With only 2 patients on the first day it was open for business already had 2 Fire Department calls. With a proposed population of 500 to 600 residents at BCHD we should be concerned about how many annual calls will be generated.

The EIR report must also identify the financial cost to the city for providing additional emergency service. BCHD must address who is going to reimburse the city of Redondo Beach for costs which will be disproportionately borne by them. The cities of Torrance, Manhattan Beach, and Hermosa will not be sharing in this cost as their emergency services will not be responding to these calls. It should be noted

the City of Redondo Beach is last year experienced a 2 million dollar structural budget deficit and cannot afford any additional costs.

Simultaneous Regional Construction Projects

The project by some accounts will be completed in 3 phases that could take as long as 15 years. In that time period it is anticipated work will also begin on many other regional projects. Two that will use the same road and traffic access will be the demolition and construction at the current AES power generation site, and the Redondo Beach Harbor renovation.

Not only will the report need to account for the impacts of these projects but how this will change over a period of nearly 15 years for residents in the surrounding 3 cities. It may therefore be necessary to have additional EIR reports generated at each of the 3 phases of construction proposed by BCHD.

Health issues

With any construction project one can expect noise, particulate debris and pollution from heavy equipment, as well as hazardous material release such as asbestos, benzene, and toluene.

The project is geo centered between the following 7 public schools: Beryl Heights Elementary, Parras Middle School, Redondo Union High School, Redondo Shores, Jefferson Elementary, Towers Elementary, West High School, Our Lady of Guadalupe School. Releasing these particulate hazards to the public could therefore be a medical experiment on a whole generation of children whose health may not be seriously impacted until decades later.

The EIR report may need to take in account these health impacts now and potential lawsuits later filed due to respiratory illness experienced by the community.

One specific location at the corner of Beryl Street and Flagler Lane was apparently a decommissioned oil drilling site. In the proposed plan this will be the future location of a child day care facility. The report must therefore detail how exposure to benzene and other petroleum based compounds be mitigated.

Sincerely,

Wayne Craig
511 S Broadway
Redondo Beach CA 90277
310-897-1756

From: EIR <eir@bchd.org>
Sent: Friday, August 02, 2019 1:33 PM
To: Meisinger, Nick
Subject: Fw: BCHD Environmental Report

From: Philip de Wolff <p4ew@aol.com>
Sent: Sunday, July 28, 2019 11:40 AM
To: EIR <eir@bchd.org>
Subject: BCHD Environmental Report

□ □ □ 1 It is not in any way acceptable for BCHD to believe that subjecting residents of Redondo Beach who live in close proximity to the proposed building of there project to live for TEN plus years in a construction zone, because it suits them financially. Three of the residents on our street suffer from heart ailments and it seems that we are at risk. The increased traffic and pollution from the building site especially large construction vehicles will definitely impact my health. The health district will become a health hazard.

Philip de Wolff
Diamond Street Redondo Beach

July 24, 2019

page 1 of 3

Re: BCHD Healthy Living Campus, proposed project

To whom it may concern:

BCHD serves Redondo, Manhattan and Hermosa Beach; consequently sent out "Healthy Living Campus" to the other cities. Our City doesn't have more room for more facilities for seniors; we with a big heart have allowed a lot of them eliminating grammar schools and contributing to the exodus of families with kids. Redondo is saturated with 7 senior complex and 2 assisted living facilities plus all over the city, board and care homes.

The irony is that in our City, for years were living many residents that are seniors now and only those are the ones that we need to take care first, particularly in emergencies.

RD-1 The first responders confirmed me that the first places they will go, in disasters, are where there is a concentration of senior facilities: housing or assisted living places. But the Redondo residents: young, the ones **old as the others** and in the middle in our community that have been living here and paying taxes for years, will be left behind!

RD-2 Prior to propose a project of this magnitude, that really is a concentration of the 420 units for the elderly, BCHD should have been doing a research in Redondo, as signal of respect to our residents, and also what is the situation in Hermosa and Manhattan that you serve too, regarding existing similar complex.

This is the list of existing senior housing and assisted living facilities in the city of Redondo

Salvation Army: corner of Beryl and Catalina Ave. across the Crown Plaza Hotel and next to Hotel El Redondo.

Casa de Los Amigos: by the beach, 123 S. Catalina Ave.

Seaside Village: 319 N. Broadway corner with Carnelian, across the City Hall.

Season: 109 S. Francisca Ave facing PCH, between Emerald St and Gardner St. former site of Mc Candles School demolished.

Heritage Point: 1801 Aviation Way [another school site eliminated]

The Montecito: 2001 Artesian Blvd corner with Green Ln. It is a 4 stories building [mixed use] that has affected all the properties behind.

Breathwater Village: 2750 Artesia Blvd, huge complex next to the Best Western Inn

Silverado: assisted living facility, 514 N. Prospect Ave inside the BCHD.

The Kensington: assisted living facility opened recently, 801 S. PCH location of Paterson School which was demolished.

Plus all over the City private board and care homes that have license to have certain amount of seniors.

Most of the **residents of those complex** and facilities are coming from all over the places, very **few are from Redondo.**

Giving room for this type of projects for the elderly, that they only benefit the outsiders, not our City, have changed the idiosyncrasy of our population: from a vibrant beach City where all ages were enjoying and related together, for a silent population of seniors that they are coming from everywhere. They are affecting our quality of life, our budget, putting pressure on our responders [that are paying for Redondo], to name few of the consequences. In addition are pushing families out, that we know for facts, they are moving to Manhattan or Palos Verdes Peninsula looking for better schools and more diverse community.

It has been proved all over the world that the seniors that have less chance to have dementia or Alzheimer are the ones that socialize with all different ages among the few benefits; besides that 99% like to **live and die in their own home..** BCHD should be aware of this information before move forward.

BCHD must send this 420 Residence Care for the Elderly Units to Manhattan that has only two [2] senior housing and its serve also for BCHD.

BCHD bought the corner lot of Flagler and Beryl, from a petroleum company that was pumping oil for years from that soil.

RD-3

Two years have passed, but BCHD has never responded to the question regarding if the soil has been tested for toxic substances and is not contaminated. Besides if the soil is contaminated: who will pay for the cleanup? The Petroleum Company or BCHD with the money it receives from our taxes.

BCHD stated that it: "has been working with the community to reimagine our aging campus to better reflect our mission and meet the current health needs of Hermosa, Manhattan and Redondo Residents".

RD-4

The above statement that sounds so good is totally a fallacy regarding both to work with the community, and the purpose of the project as I explained above. Very few people from Redondo assisted to the meetings, because they never were well promoted that every single one in the City of Redondo be aware what was behind the Healthy Living Campus. The ones that attended and push for the project in our City were residents of Manhattan Beach with the message NOT IN MY BACKYARD!

BCHD Healthy Living Campus is in reality a **concentration of 420 Residential Care for the Elderly units!!**, that they will be added to the collection that Redondo already has plus its consequences.

NO PROJECT is the only answer for the BCHD proposed project!

Redondo cannot be the dumping place of these types of projects, every city needs to share the burden, in this case in particular the others that BCHD serve!!!!

Page 3 Of 3



Rene' A. Diaz

District 3

From: EIR <eir@bchd.org>
Sent: Friday, August 02, 2019 1:53 PM
To: Meisinger, Nick
Subject: Fw: Public Comments on Proposed BCHD Expansion Project

From: Dave Dillard <mail@davedillard.com>
Sent: Monday, July 29, 2019 12:14 PM
To: EIR <eir@bchd.org>
Cc: Bruce and Theresa Steele <litespeedmtb1@verizon.net>; Abbas Khani <abbkh3@aol.com>; Aileen Pavlin <arpavlin@gmail.com>; Alice Wu <a64011@yahoo.com>; Santiago Santana <santiana@verizon.net>; Bill Shanney <wshanney@verizon.net>; Bob Ronne <r.ronne.apc@gmail.com>; Bruce Szeles <bruce.szeles@gmail.com>; Candy Yarborough <Yarborough@me.com>; Chad Butzine <ChadB@ascotlimousine.com>; Dah-Weih Duan (Sherry Hsieh) <dahweih@gmail.com>; Ed Arnn <edarnn@earthlink.net>; Eddie Choy <edchoy01@gmail.com>; Elaine & Jo Porzucki <elaineporzucki@gmail.com>; Ellie Reid <loicy@aol.com>; Erin Hicks <erin@hicksfamily.com>; Frank Briganti <fjbriganti@aol.com>; Frank von Coelln <von@earthlink.net>; Fred & Mary Lester <Fredmlester@prodigy.net>; Gary Teraoka <Mr-Rocky@socal.rr.com>; J Scott <jscott006@socal.rr.com>; Jack Holman (Danelle) <jack.holman@airnz.com>; James & Janice Clark <james.clark3@verizon.net>; Jan & Scott Vogt <janpug@verizon.net>; Jan McDonald <jantana11@hotmail.com>; Jerry & Irmi Lake <jmlake7@aol.com>; Jill and Mike Conover <jillconover@gmail.com>; Jim Childers <kinders3@verizon.net>; Joan Hardy <joantareshhardy@gmail.com>; Joann Arnn <joarnn@earthlink.net>; Joyce Stauffer <jostauffer@verizon.net>; Kathy Merkovsky <kmerkovsky@hotmail.com>; Linda Choy <ljochoy416@gmail.com>; Linda Feldman <imalinda@aol.com>; Lisa Limm <lclimm@yahoo.com>; LuJean Levy <levyclann@aol.com>; Lynn Hardy <lyn.hardy@gmail.com>; Lynne & Tim Meehan <ltkatee@gmail.com>; Mari Ramskill <mari.ramskill@gmail.com>; Maria Mocega <mocegom@yahoo.com>; mdgapg <mdgapg@verizon.net>; Michelle Eisenberg <micheisen@msn.com>; ninjabytes <ninjabytes@hotmail.com>; Phil Yarborough <pyarborough@me.com>; Phillip (Diamond) <p4ew@aol.com>; Raymond Johnson <rjohnson839@verizon.net>; Rich Matsui <rtmatsui@socal.rr.com>; Rick and Joan <joanrickca@gmail.com>; Robin & Alan Arehart <ararehart@yahoo.com>; Sabrina Barakat <sabsinla@hotmail.com>; Sandy Williamson <sjmwilliamson@hotmail.com>; Scott Vogt <gsvogt@verizon.net>; Seb Sarkisian <srsark1@msn.com>; Stephanie Ishioka <sishioka@yahoo.com>; Stephen and Scarlett <stevebillis@outlook.com>; Steve Ramskill <sramskill@decurion.com>; Steve Saber <backsaber@aol.com>; stffieri <stffieri@hotmail.com>; Susan Earnest <SusanEarnestRealtor@gmail.com>; Suzan Khani <suzankhani11@gmail.com>; Tamiko Sato <tammytammysugar@gmail.com>; teresa steele <tasteele1950@gmail.com>; Terry Hartigan <the4u@verizon.net>; Tim Ozenne <tozenne@gmail.com>; Wally Heser <wheser@verizon.net>; Ann Cheung <acheungbiz@gmail.com>; OMartinez@torranceca.gov <OMartinez@torranceca.gov>; Danny & Tara Fink <iamfinky@yahoo.com>; HLCInfo <HLCInfo@bchd.org>
Subject: Public Comments on Proposed BCHD Expansion Project

Mr. Nick Meisinger,

Please see my comments on the BCHD project below.

Thank you,
Dave Dillard

Traffic

□□-1 Regarding the EIR, one big concern is any additional traffic through our neighborhood that will result from this new development. Currently, we have a lot of “cut through” traffic (see map) along Redbeam and Mildred. Cut thru traffic flows from Flagler to Del Amo and vice-versa. At peak driving hours, morning and afternoon I have personally counted **200** cars per hour driving past our house on Redbeam Ave.

□□-□ I believe the best solution to reduce cut through traffic would be to move the ingress/egress on Flagler to Beryl Ave. This would keep the project totally within Redondo Beach and remove the need to coordinate with the City of Torrance regarding the “dumping” of traffic into the adjacent Torrance neighborhood. Torrance city officials could separately deal with cut through traffic based on the resident’s overall preferences.

Protracted 15 Year Development Plan

□□-□ Because BCHD does not currently have funds and investment partners to develop the entire site in one construction phase, they have decided to stretch the development time frame over 12-15 years. This plan is really the most unconscionable part of the BCHD proposal. It holds our neighborhood hostage for at least a decade and a half wondering what and when the next phase will begin and end. Given the history of projects of this size in Redondo Beach and the slow or no growth attitudes in the city, the 12-15 year time frame is very likely to be stretched out another 5-10 years.

Solution would be either develop site in one phase or sell it to some entity that has the resources to get the job done in a timely fashion.

Shadows

□□-□ Another concern is the “shadow” effect that the new development will have on those who live on Tomlee and Mildred. The BCHD project calls for the new building to be 60 feet high at the edge of the BCHD property. The height issue is exacerbated by a design that includes an open area underneath the proposed building along the eastern edge of the project.

Solution would be to re-design to put building at ground level at eastern edge or move buildings toward the center of the project.

Thank you for your time and consideration in this important matter.

Dave Dillard

From: EIR <eir@bchd.org>
Sent: Friday, August 02, 2019 1:55 PM
To: Meisinger, Nick
Subject: Fw: EIR feedback re: Healthy Living Campus

From: Lara Duke <larajs@yahoo.com>
Sent: Sunday, July 28, 2019 10:26 PM
To: EIR <eir@bchd.org>; Lara Duke <larajs@yahoo.com>
Cc: Bill Brand <bill.brand@redondo.org>; Laura Emdee <laura.emdee@redondo.org>; John Gran <john.gran@redondo.org>; District 2 City Councilmember Todd Loewenstein <todd.loewenstein@redondo.org>; Christian Horvath – Redondo Beach District 3 Council Member / Mayor Pro Tem <christian.horvath@redondo.org>; Nils Nehrenheim <nils.nehrenheim@redondo.org>
Subject: EIR feedback re: Healthy Living Campus

I continue to dispute the BCHD's ridiculous concept for a Healthy Living Campus. They assert, based on studies of dubious origin, that Redondo Beach needs 420 elderly care units at this site (Prospect/Beryl/Flagler/Diamond). In the South Bay, we in Redondo Beach already provide numerous senior and assisted living facilities; we have nine senior and assisted living facilities, while Manhattan Beach and Hermosa Beach each has a comically low number. The HLC would be in a neighborhood of single family homes. A multi-residential complex of this scale would crush the neighborhood character, not to mention fly in the face of BCHD's mission statement: "To enhance community health through partnerships, programs and services for people who live and work in Hermosa, Manhattan and Redondo Beach."

The HLC plan is a money-grab which would benefit a tiny number of residents who could afford these units, and have dire consequences on the local community. BCHD representatives are spinning the notion of "aging in place" to mean an elderly person no longer able to be in their home would have the good fortune of at least living in the same town as where their home was. The concept of "aging in place" should mean helping an elderly person actually remain in their home-- this is the true mission BCHD should be tackling—and it's one being tackled and successfully met on national and global levels.

The BCHD reps said at their presentation two years ago, that they are a public agency and each of us is a stakeholder. Our property taxes go into their budget and we have a say in what they do. As the official designated entity of South Bay community health, they should be reminded that Redondo Beach gets denser every day. In the last three decades, we have lost thousands of R-1 lots. Ironically, BCHD wants to do a project that impairs our health by causing more density, noise, blocks sky views and light, and creates longer wait times in traffic. Further, BCHD is supposed to be for the public at large, but this HLC plan would benefit only the very wealthy who could afford it. Questions asked of them about whether there will be affordable units, are met with mealy-mouthed replies hiding the fact that they will be striving primarily for market value units.

It's important to realize that the proposed site is zoned P-CF—(public-community facilities). It's rare zoning intended for the entire community's use. It's eleven acres that could be a flagship area befitting the BCHD *true* mission statement. The most recent iteration of the HLC looks like the mothership from the movie Close Encounters of the Third Kind, smack in the middle of a mostly R-1 Redondo Beach and Torrance neighborhood.

□□-□ The scope of this project is an insult on many fronts. The latest plan reduces the units from 460 to 420, and the height from 7 to 4 stories. The Kensington project on PCH and Knob Hill has 94 units and two stories. This HLC project even in its reduced form, would be quadruple that size, twice as tall, and in the middle of a small neighborhood zoned mostly R-1, putting major strains on both Torrance and Redondo residents. A smaller monstrosity is still a monstrosity. And this isn't event on a main strip, like PCH. It's the area between Flagler, Beryl, Prospect and Diamond.

Residential Care Facility is only a conditional use on this site, but this proposal is not even that—it's senior housing. There are zones for such projects as this one, and they're called RH for residential high density. RH4 in this case—if such a thing exists.

□□-□ The only allowable uses for this site (P-CF) are: parks, parkettes, open space, recreational facilities, and coastal bluffs. And even the conditional uses (of which Residential Care Facilities are included), are intended to be and should be public-oriented. They are uses like: Adult Education Centers, government buildings, agricultural, cultural institutions, performance arts facilities.

We should honor the public intent of the zoning on this space—it is necessary and rare in our built-out city. Instead we're seeing a greed-driven project before us, sold as BCHD solving a made-up crisis. Given the necessity of a Conditional Use Permit for this project to move forward, it will come before our City Council and Planning Commission in the future and I hope they'll consider what I've said. The Healthy Living Campus is a bogus concept, and one that should be rejected en masse for this area of land.

Thank you.
Lara Duke

July 24, 2019

Mr. Nick Meisinger, Environmental Planner
Wood Environmental & Infrastructure, Inc.
9210 Sky Park Court, Suite 200
San Diego, CA 92123

**Re: Beach Cities Health District Healthy Living Campus
Redevelopment Existing BCHD Campus**

Dear Mr. Meisinger,

This letter is in reference to the proposed project of the redevelopment of the existing BCHD campus located at 514 North Prospect Ave., Redondo Beach, CA. and the adjacent vacant lot on the southwest corner of Flagler Lane and Beryl Street.

As a long term homeowner living below the proposed project on Tomlee Ave., it is clear that this project will significantly impact all the homeowners in this neighborhood during and after the new construction. My biggest concern after reviewing the renderings (plans) of the construction, is the TRAFFIC! Giving public access to the facilities by way of Flagler with the subterranean parking will definitely impact the congestion and traffic of the homeowners while entering and exiting the neighborhood to the north.

GD-1

Furthermore, traffic within the neighborhood would increase as the streets in the neighborhood (Redbeam, Mildred, and Towers Street) would be used by the public to cut across to access BCHD Campus. More importantly, the safety of the children at Towers Elementary School is a concern as the corner of Redbeam and Towers is used to pick up and drop off kids using the alley way. Hence, the entrance and exit of the parking will not only cause more traffic in the neighborhood, but is definitely a safety hazard for the children and parents. Our neighborhood streets will be used for parking for those who want to visit the facilities without parking in the underground structure as well.

GD-2

GD-3

GD-4

How can BCHD propose a subterranean parking entrance and exit in their plans on Flagler? You must consider the traffic it will cause and the impact to the homeowners. Our peace, enjoyment and safety will be affected. Was there a study on how the neighborhood and the surrounding area will be impacted by traffic with 420 units, a Child Development Center, and a Health and Fitness Center being built? What are you plans to mitigate the traffic problems?

GD-5

In lieu of building the subterranean parking on Flagler, a new plan should be proposed to build the subterranean parking off of Diamond, or improve the existing entrance on Prospect with subterranean parking. If the new proposed plan isn't feasible after exhausting all possibilities, I suggest that BCHD make capital improvements to mitigate the traffic by widening the streets with added lanes to Flagler and Beryl Street, including a traffic signal at the corner of Flagler and Beryl. Furthermore, a one way exit from Towers to Flagler for the homeowners to exit the neighborhood is needed.

GD-6

My concerns and input would be highly appreciated.

Sincerely,

Gary Dyo
19715 Tomlee Avenue, Torrance, CA 90503
garysdyo@yahoo.com

Ramos, Ryan

From: EIR <eir@bchd.org>
Sent: Thursday, July 25, 2019 10:04 PM
To: Meisinger, Nick
Subject: Fw: CONCERNS to be Addressed in the EIR

From: Stephanie Dyo <steph.dyo@gmail.com>
Sent: Saturday, July 20, 2019 12:13 AM
To: EIR <eir@bchd.org>
Subject: CONCERNS to be Addressed in the EIR

To Whom it May Concern:

SD-1 I am a retired school teacher living in the Torrance neighborhood near BCHD. I am extremely concerned about how BCHD is portraying the impact of this 15 year project as mere inconveniences. Rather, these are tangible problems and will present harm specifically to the young and old. This must be researched and explored more.

SD-2 For example, "noise and vibration" are concepts that breathe life...Noise pollution has been documented to increase stress, which leads to heart disease, which in turn leads to early death. One must include the fact that NOT ALL residents have two parents who work during the day and are away from home, and their kids are away at school and the "extra noise" would have little effect on them. YOU must remember that this Torrance neighborhood ALSO INCLUDES residents who are OLDER and are home ALL DAY. This project will cause them real harm, it is not just annoying. In addition, the local neighborhood has Towers Elementary, and these 5-10 year old kids are not able to process noise and vibration the same like adults in their prime. It is not just an SD-3 "inconvenience" but research has shown that such continual noise and vibrations (kids also may mistake each vibration as a lifethreatening earthquake) can cause permanent physical and emotional harm. As a former teacher, I know student learning is impacted by noise when one must focus and learn, and listen to their teacher. Is BCHD willing to toy with kids physical and emotional well being?

SD-4 Another hazard is the dust and perhaps the noxious elements such as aerosol in form that are harmful to the young body. For a health district, YOU ARE NOT considering the health of the YOUNG and the OLD in the nearby neighborhood. The logistics of this project must be considered. Children spend a good portion of their day OUTSIDE on the playground, and are not in a protected indoor environment. Older residents will similarly be affected like the children will be. What may be annoying to a healthy young adult may be fatal for a frail or elderly person.

SD-5 There are SAFETY concerns you must consider more seriously. Descriptions and documentation of all incidents of drivers ignoring the stop sign at Towers and Mildred, as well as other instances of dangerous driving near the construction zone will all have the greatest impact yet AGAIN on those who are most vulnerable among us...the YOUNG and OLD. BCHD needs to protect these people, the YOUNG and the OLD, not expose them to

greater risk of harm. Kids are crossing the street daily and will be at risk of serious injury/death, and the consequences and risks will lie with those who carelessly approve such a DANGEROUS project.

SD-6 | There is a sensible ALTERNATIVE. BCHD must rally to CLOSE Towers Street at the Flagler intersection. Flagler becomes a one-way street as it heads towards Towers Street, and continues its one-way journey along Diamond Street out to Prospect Avenue. This is the ONLY solution which creates a safe "flow" of traffic which will eliminate the risk to children, and allows the permanent burdens be borne by those who benefit from the project.

SD-7 | And finally, BCHD must specify clearly, "Noise and Vibrations" are vague generalities. Please speak in specificity. How many decibels of noise are expected? For how long (both during the day and overall)? Any assessment of effect? Cumulative effect?

This project needs further research and guidance to show that BCHD cares for the residents most impacted by this project.

Sincerely,
Stephanie Dyo

July 29, 2019

Dear Mr. Meisinger,

Here are my input to the upcoming EIR study.

Main Concerns:

- ☐☐-1 • Project Scale - reduce size and pull buildings off of property line (privacy, shade concerns)
- ☐☐-☐ • Project Duration - construction should be limited to 3-5 years (reduces multiple concerns)
- ☐☐-☐ • Sea Breeze - create multiple buildings as to not block breeze (breeze concern)
- ☐☐-☐ • Parking Structure Exit - all ingress/egress should be from Prospect, and not through our neighborhood (traffic concerns)

Reference Section I, AESTHETICS

- ☐☐-☐ 1. A Key Viewing Location (KVL) to assess the impact for each attribute shall be identified from worst case vantage point for that attribute. (e.g. Shade: The impact to shade and shadow effects shall be assessed from vantage point of those residents just east of project site for evening sun, 5600 block of Towers St. Torrance, CA, etc).
- ☐☐-☐ 2. Impact to shade and shadow shall be provided in terms of increased shade time per month for each month across a calendar year. For 'shade and shadow' impact, the report shall identify: the method of measurement; the standard and source for determining the method of measurement; the instruments that will be used in taking the measurement; the date of last calibration of the instrument; the frequency of calibration for the instrument; the firm who will be taking the measurement; the certification and training records for those employees taking the measurement. The report shall state the time of day that the referenced KVL will enter into shade for each day of the year. The report shall provide a threshold for what change in shade and shadow that is deemed acceptable.
- ☐☐-☐ 3. EIR shall discuss issues and non-conformances related to California Environmental Quality Act (CEQA), as well as "issues related to conformance with the RBMC, City of Redondo Beach General Plan and other related City of Redondo Beach regulations governing scenic quality."
- ☐☐-☐ 4. **Project is grossly out of place and too large of scale for the residential area that it is in. The new buildings should be pulled away from the property lines and shifted to north side of the lot toward the Vons.**

Reference Section III, AIR QUALITY

- ☐☐-☐ 1. I challenge rating of Section 'd' of "Less Than Significant Impact", rating should be raised to "Potentially Significant Impact". You are unaware and uncertain of the emissions that will be coming from this construction site during demolition and removal. Since this is a 60+ year old medical facility, there are unknown chemicals, toxins, asbestos, mold and carcinogens that could be become airborne without your knowledge.
- ☐☐-1☐ 2. The report shall provide a list of pollutants that will be measured. And for each pollutant measured, the report shall identify: the method of measurement; the standard and source for determining the method of measurement; the instruments that will be used in taking the measurement; the date of last calibration of the instrument; the frequency of calibration for the instrument; the firm who will

be taking the measurement; the certification and training records for those employees taking the measurement.

- 3. The report shall calculate the amount (volume, weight) of construction dirt/dust/debris that will become airborne. The impacts from the airborne dirt/dust/debris shall be discussed and assessed.
- 4. The report shall calculate the amount of chemicals and medical hazard that will become airborne due to construction. The impacts from the airborne chemicals and medical hazard shall be discussed and assessed. Assessment shall include impacts to health (asthma, COPD, emphysema, cancer), as well as, cost impact from said health impacts. Assessment shall also include cost impact from sediment settling on personal property (cars, houses, inside homes, yards).
- 5. Report shall address impacts to Sunny Glen park.

Reference Section IV, BIOLOGICAL RESOURCES

- 1. Report shall address the presence of the Red Tailed Hawk that has been seen visiting our area and what measures will be performed to preserve their habitat.
- 2. Report shall address the presence of the migratory birds that has been seen visiting our area and what measures will be performed to preserve their habitat.
- 3. Report shall address the presence of the Palos Verdes blue butterfly that has been seen visiting our area and what measures will be performed to preserve or adding their food plant to the project site.
- 4. Report shall contact the conservatories in our area to address the possible re-introduction of native wetland habitat for native species of animals, water fowl and plant.
- 5. Report shall contact the conservatories in our area to address the possible re-introduction of native habitat for native species of animals, fowl and plant.

Reference Section XVI, RECREATION

- 1. Disagree that rating for item 'a' and 'b' would be "No impact", but would be at least "Less Than Significant Impact". Use of regional and area parks from residents, visitors and workers would increase and therefore maintenance requirements for these parks would necessarily increase, in kind.

Reference Section XVII, TRANSPORTATION

- 1. Report shall address traffic impacts from increased number of residents, workers (daily commuters), daily visitors, delivery trucks, service personnel. Impacts assessment shall include traffic onto Flagler Lane. Shall also separately include traffic to/from Towers, Redbeam Ave and Mildred Ave in Torrance.
- 2. Impact from increased traffic WILL BE SIGNIFICANT. **Parking entrance shall be moved from Flagler Lane to Diamond Ave or Prospect Ave.**
- 3. Report shall address impact to public transportation system due to project, all construction phases and ongoing for the project year-over-year (YOY) (e.g. capacity, need, cost, tax increase, etc.)
- 4. Although the project adds a single very short bicycle lane, there is an increased safety risk to cyclist and to pedestrian due the vastly increased amount of traffic. The report shall address the increased safety risk to pedestrians and cyclists in the area due to increased traffic. The report shall indicate measures that will be taken to eliminate those risks.
- 5. Report shall address traffic impacts from increased number of residents, workers (daily commuters), daily visitors, delivery trucks, service personnel. Impacts assessment shall include traffic onto Flagler Lane. Shall also separately include traffic to/from Towers, Tomlee, Redbeam Ave and Mildred Ave in Torrance.

- 00-00 6. Report shall include in assessment impact of BCHD visitors and workers parking on Flagler Lane, Towers Ave and other surrounding neighborhood streets.

Reference Section XVII, PUBLIC SERVICES

- 00-00 1. Challenge to rating for 'c', Schools as "No impact". Rating should be higher.
- Homes of older residents that move into the facility will be sold, rented or other. Younger families with school-aged children could move into the area and increase enrollment.
 - Families with school-aged children could move into the Beach Cities area for the sole purpose of being closer to their elder family members. This will could increase school enrollment.
- 00-00 2. Challenge to rating for 'd', Parks as "No impact". Rating should be higher. Reasons explained earlier in document.
- 00-00 3. Challenge to rating for 'e', Other as "No impact". Rating should be higher. Similar to reasons described in item number 1 above.

OTHER CONCERNS

- 00-00 1. Report shall detail impact to Torrance water supply, water pressure, impact of FIRE DEPT (time or ability) of extinguishing fires.
- 00-00 2. Report shall detail noise impact to Torrance residents during each of the construction phases and ongoing for the project YOY. Noise from construction, building site, delivery vehicles, residents, increased traffic, workers, visitors.
- 00-01 3. Impact from backfilling pulverized concrete into basement of old hospital... concrete may be contaminated with medical waste and affect water quality. How could this impact water quality? Does it add carcinogens to drinking water?
- 00-00 4. Should not allow pulverizing of construction material on-site. This act adds unnecessary dust and noise.
- 00-00 5. Report shall assess impact to sea breeze to adjacent neighborhood - from perspective of Mildred or Towers Ave.
- 00-00 6. Report shall address impact to privacy for homes on 19400 block of Tomlee Ave with the hundreds of new windows and people possibly staring down into the houses.

Thank you,

Jeff Earnest

Tomlee Avenue Resident

July 29, 2019

Dear Mr. Meisinger,

I am a Torrance resident (Pacific South Bay Tract) and I reside in one of the homes located directly behind the BCHD proposed project. Like my neighbors, I have many concerns relating to health, air quality, traffic, and safety and other important issues arising from this project.

Property Value

□□-1 One area of concern is the decline in property value. As a local realtor for almost 20 years, it will hurt our property value as it will degrade our neighborhood. If we decide to sell, we will be required to disclose in writing to potential buyers of the 15-year project as it will affect the incoming buyer. Who is going to want to pay top dollar for a home and deal with this burden for 15 years? The Pacific South Bay Tract is considered the crown jewel in West Torrance and one of the most sought after neighborhoods with the ocean breeze and known for its quiet and serene community. The project will increase traffic and there will be a loss of the ocean breeze and privacy with the gigantic development looming over our homes. There will be a shade that will cast over the tract, and glare from the windows that will definitely impact homes on Tomlee and Mildred. These are just some of the issues that will negatively impact the neighborhood and decrease our property value.

□□-□ This massive development should be relocated to a central location in the heart of Beach Cities to better serve its residents, and not on the Torrance border surrounded by residential homes. The colossal project is so out of place. It doesn't appear to conform or to be compatible with the surrounding neighborhoods in Torrance and Redondo. The renderings only show it from an aerial view and do not provide the perspective from the Pacific South Bay Tract neighborhood which will be directly impacted. I feel it is necessary for BCHD to consider dramatically □□-□ descaling the project and pulling it away from the property line or abandoning the project altogether.

15 Year Plan / Health / Air Quality

□□-□ The proposal for a 15-year construction plan is preposterous and unconscionable. It is unreasonable to expect Torrance and Redondo Beach citizens to endure 15 long years of construction. The plan to pulverize on-site is unacceptable. There is no way to control the wind □□-□ from blowing the toxins and debris into our neighborhood, Towers Elementary School and beyond. The elderly and the young and people with chronic pulmonary problems such as COPD and asthma will be severely affected.

Traffic

□□-□ The proposed expansion imposes enormous traffic issues during construction and post-construction. The underground parking located on Flager about 50 yards from the entrance of our neighborhood is unacceptable. The facility traffic should enter and exit via Prospect Avenue

□□-□□□□□□□□ which is a major street on the west side of the project. It should burden and affect Redondo Beach whose residents will reap the benefits from this development. Torrance will see an increase of traffic during construction and post-construction as the project is on the border of Torrance, thus, trucks and vehicles will be using Torrance streets and cutting through our neighborhood for ingress and egress. Towers Elementary School will be impacted and the increase in traffic present safety risks for children being dropped off and picked up.

□□-1□ Ironically, this project is supposed to be a wellness center for Beach Cities residents but it jeopardizes the health and well-being of the Torrance and Redondo residents during 15 years of construction. While the Beach Cities residents will enjoy all the benefits and wellness care, what about the wellness of the Torrance residents? This proposal lacks any consideration for Torrance residents, the young and the old, especially those of us who live in the Pacific South Bay Tract whose health will be severely impacted. The well-being of Torrance residents should matter and □□-11 be taken into consideration. I feel it is necessary for BCHD to consider dramatically descaling the project and pulling it away from the property line or abandoning the project altogether.

Thank you for your consideration.

Susan Earnest
Concerned Torrance Resident
Tomlee Avenue

From: EIR <eir@bchd.org>
Sent: Friday, August 02, 2019 1:32 PM
To: Meisinger, Nick
Subject: Fw: Unhealthy Living Campus

From: James Ecklund <james.ecklund@yahoo.com>
Sent: Saturday, July 27, 2019 7:25 PM
To: EIR <eir@bchd.org>
Subject: Unhealthy Living Campus

I changed the name of this project just as I'll ask the Daily Breeze, the Los Angeles Times, and Torrance City Council to say when referring to this unnecessary development. I live in Torrance East of said project and will not be supporting this as planned. I have the following suggestions in an attempt to satisfy most stakeholders:

- ☐☐☐-1 Reduce the size of this structure and offer a business justification for the current plan
- ☐☐☐ Move the building West to border Prospect where all the vehicles and patients MUST access this property at controlled traffic lights.
- ☐☐☐ Move the green space to the rear for the neighbors so they are not in a shadow all day.
- ☐☐☐ Most likely there are carcinogens, lead, asbestos, and possibly mercury present in old hospitals therefore abandon any plans to break concrete or other building materials on site.
- ☐☐☐ Restrict access to Prospect only, keeping all traffic out of the West Torrance neighborhood.
- ☐☐☐ Add a truck delivery dock underground and limit hours of operation and restrict from using Del Amo Blvd.

James Ecklund

To: EIR
Subject: RE: Public Comments, Healthy Living Project EIR

From: Barbara Epstein <justbarb56@gmail.com>
Date: July 28, 2019 at 4:46:23 PM PDT
To: hlcinfo@bchd.org
Subject: Public Comments, Healthy Living Project EIR

Dear Friends at Beach Cities Health District,

I have carefully examined the information regarding the proposed project.

I object to the project.

□□-1 | The first reason: I am morally opposed to this public facility contracting with a private business to take away public property, assets, and taxes from citizens for a project that does not directly benefit the general public. The City of Redondo beach has wrongly established this practice over the years, and it is not in the public interest.

□□-□ | The second reason: Our senior citizen demographic will never be able to live at the proposed residential facility because it will be too expensive for the average senior. I would withdraw this objection in the event that the residential portion of the project would become strictly non-profit, giving the senior community residential access with only a portion of their Social Security income.

□□-□ | The third reason: This project puts too much of an environmental burden on the surrounding neighborhoods in terms of air quality, noise, and traffic over a span of fifteen years, at least. None of this would fit in with the BCHD health goals.

□□-□ | The fourth reason: It is clear to me and most citizens that the size this entire project was designed to accommodate the developers of the residential portion of the project without regard to the community as a whole. Most residents think the size, height, and sheer mass of this plan is grossly excessive.

□□-□ | My suggestion: Cancel this project and start new plans to simply refurbish and renew existing buildings.

The public appreciates your efforts and would like to continue without the residential element.

Please send me an acknowledgement that you received this comment.

Thank You Very Much,

Barbara and Jack Epstein
230 The Village #305

Redondo Beach, 90277
justbarb56@gmail.com
310-378-7317

Ramos, Ryan

From: Leslie Dickey <Leslie.Dickey@bchd.org>
Sent: Monday, July 15, 2019 3:41 PM
To: Cristan Higa; Dan Smith
Cc: Ed Almanza; Meisinger, Nick
Subject: PROJECT QUESTION - Mary Ewell

I had a voice message from Mary Ewell. Just a request for a return call – no information provided.

ME-1 | I called her back - we had a bad connection. We could not hear each other very well. Mary has questions about the zoning of the property and how BCHD acquired the property.

She asked if BCHD was going to sell the property.

Someone should call her back.

Thank you,

Leslie Dickey

Executive Director of Real Estate

Beach Cities Health District

Leslie.Dickey@BCHD.org

Ph: 310-374-3426, x274

Fax: 310-376-4738

www.bchd.org

www.facebook.com/beachcitieshealthdistrict

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Ramos, Ryan

From: EIR <eir@bchd.org>
Sent: Thursday, July 25, 2019 9:58 PM
To: Meisinger, Nick
Subject: Fw: BCHD Healthy Living Campus Master Plan

From: Lisa Falk <kaholo@earthlink.net>
Sent: Tuesday, July 16, 2019 1:44 PM
To: EIR <eir@bchd.org>
Cc: Bill Brand <bill.brand@redondo.org>; todd.loewenstein@redondo.org <todd.loewenstein@redondo.org>; christian.horvath@redondo.org <christian.horvath@redondo.org>
Subject: BCHD Healthy Living Campus Master Plan

TO: Mr. Nick Meisinger, Environmental Planner

Good Afternoon!

I keep reading that the 'revised' plan addresses traffic mitigation - I've searched, but seen nothing concrete about what is planned / has been changed to help Prospect Avenue during commute times.

The stretch of Prospect between Del Amo Blvd. and 190th is severely congested daily from 7:30am-9:30am, as youth are dropped at or drive to the middle and high schools, and parents drop children at BCHD for child care, while people also arrive at BCHD for wellness endeavors.

There are only four north-south routes between Redondo Beach and El Segundo - Prospect Avenue is a major commute route for military and aerospace workers, in addition to the school / child care / wellness traffic that occurs during this time frame.

I'd very much appreciate knowing what is planned to mitigate extra impacts on this stretch of road from your development, and want to see the EIR address it specifically.

(For example, no wellness classes starting during main commuting hours; drop off for child care only from the southeast, via the small part of Diamond Street east of Prospect, not directly turning from Prospect, backing up an entire lane of traffic...etc.)

Lisa Falk
South Juanita Avenue
Redondo Beach

Ramos, Ryan

From: EIR <eir@bchd.org>
Sent: Thursday, July 25, 2019 9:59 PM
To: Meisinger, Nick
Subject: Fw: Re:redvelopment

From: Fred fasen <fasen@sbcglobal.net>
Sent: Tuesday, July 16, 2019 8:02 AM
To: EIR <eir@bchd.org>
Subject: Re:redvelopment

I attended the first public EIR meeting in Redondo.

After reading the articles concerning this issue in the daily breeze, I decided to see for myself.

FF-1 | I live about a mile from existing BCHD. I cannot fathom a project over 10 years in scope for this area!

FF-2 | I cannot think about the extra auto traffic for 10 years! I cannot guess the impact on air quality for 10years!

FF-3 | Since, a new hospital was built at Providence (little company) and a new one at Torrance Memorial and an Assisted Living facility at Knob Hill, the last thing we need is to build one at BCHD address!

There was not one resident in attendance who favored the project. That alone should tell you the project is not worth it!

Fred Fasen

Resident RB

Sent from my iPhone

From: EIR <eir@bchd.org>
Sent: Friday, August 02, 2019 1:35 PM
To: Meisinger, Nick
Subject: Fw: living campus

From: Fred Fasen <fasen@sbcglobal.net>
Sent: Sunday, July 28, 2019 7:27 PM
To: EIR <eir@bchd.org>
Subject: re: living campus

□□□-1 It is not a living campus. Its a assisted living facility for the elderly. It is just like all the other ones that are situated around Redondo Beach.

□□□-□ The land is also public land. It was not meant to be given away to for profit developers wanting to try to fit the square peg into the round hole.

□□□-□ A project that is projected to be completed in 3 phases over a 15 year period is doomed to fail on so many different fronts.

□□□-□ Cost control over 15 years is impossible. The needs for year one will be completely different than the needs for year 15.

□□□-□ Like all other projects designed for a small community this project is over sized and cannot be completely without hazardous conditions

surrounding the project from first truck of dirt to last truck of cement.

□□□-□ Evidently, it is not profitable enough to scale back the project to a manageable size and a controlable time frame.

□□□-□ The other problem, is that at the same time, the AES plant will be undergoing a change and will also take years to complete.

Dueling projects in the same area only make each project more problematic and more expensive.

It is not time to re-create BCHD to an assisted for profit living facility without the citizens of Redondo Beach voting for its

viability. You cannot take public lands away.

sincerely.

Fred Fasen
1103 opal st
Redondo beach, ca 90277

Ramos, Ryan

From: EIR <eir@bchd.org>
Sent: Thursday, July 25, 2019 10:27 PM
To: Meisinger, Nick
Subject: Fw: Proposed Beach Cities project at South Bay site

From: Linda Feldman <imalinda@aol.com>
Sent: Tuesday, July 23, 2019 9:21 PM
To: EIR <eir@bchd.org>
Subject: Proposed Beach Cities project at South Bay site

LF-1 I am concerned about the project and how it impacts the Pacific South Bay Tract. I especially don't like the exit and
LF-2 entrance of the parking garage onto Flagler . It will bring a lot of traffic through the tract. I am also concerned about the
height of the buildings and if that will restrict the breeze that we get from the ocean.

Thank you,
Linda Feldman
19515 Linda Drive
Torrance, Ca. 90503
Sent from Linda's iPad.

Ramos, Ryan

From: EIR <eir@bchd.org>
Sent: Thursday, July 25, 2019 10:34 PM
To: Meisinger, Nick
Subject: Fw: Beach Cities Project

From: joyce field <jafield@verizon.net>
Sent: Tuesday, July 23, 2019 4:59 PM
To: EIR <eir@bchd.org>
Subject: Beach Cities Project

JF-1 | I live below the project site on Tomlee Avenue. I am most concerned about the property on Flagler & Beryl. It is crowded at best when school is in session and we don't need any more traffic in our immediate area. Having the entrance and exit on Flagler would be a nightmare. Last year we went to a meeting and voiced our opinions and now it is starting over. Also I would like to know what is being done to clean the site to code since there was an oil pump on that site for years. Joyce Field

JF-2 |

Daniel Fink
19714 Tomlee Ave
Torrance, CA 90503
July 28, 2019

BY FIRST CLASS MAIL AND E-MAIL (EIR@bchd.org)
Wood Environment & Infrastructure Solutions
9210 Sky Park Court
Suite 200
San Diego, CA 92123

Attention: Mr. Nick Meisinger, NEPA/CEQA Project Manager

Re: Public Comments on Proposed BCHD
Expansion Project

Dear Mr. Meisinger:

It is with the greatest concern for the residents of both Redondo Beach and Torrance that I submit my comments below. Having been a longtime resident of both the Redondo Beach and Torrance communities, and after reviewing the construction plans for this effort, I feel compelled to recommend either a dramatic scaling back of this project or the complete abandonment of it altogether. The size and scope of this project is far better suited for an industrial zone, than a quiet, weather- and health-conscious beach community. I understand the desire for a healthy living campus to provide wellness consultations and support the needs of the burgeoning retirement community. Nevertheless, I find the approach this project is taking to address these issues will create negative impacts that far outweigh the benefits for Redondo Beach and the neighboring communities. My concerns for this project are broad, and I would like to concentrate on the following:

TRAFFIC

The entire premise of this project is to provide value and assistance in an effort to improve the entire neighborhood and its surrounding areas. However, this gargantuan development dropped right in the middle of a bedroom community is horrendously conceived from an ingress/egress perspective. I find it insulting that the planners of a massive 10.38 acre development built in the city of Redondo Beach believed that the best way to be a good neighbor was to place the primary entrance and exit in the city of Torrance. This brazen insensitivity and complete lack of consideration for the residents in the area is the clearest indication yet of the reckless lack of accountability this development plans to have during this entire process. The traffic that this project would introduce to this area will be suffocating. The elementary school that sits about a hundred feet from this port of entry would be placed in immediate danger from the endless cavalcade of cars, trucks, busses, and vans. I shudder to think of the safety of children whose lives will be endangered by the exploding traffic that will choke our neighborhood. All ingress/egress channels for this project must be located far away from our neighborhood community and be located solely within the high traffic areas of Redondo Beach. I feel a great deal of sorrow for the Redondo Beach residents of Prospect Avenue for the increased traffic they will have to endure. However, those residents purchased their property with full knowledge of four-lane traffic, and a 35 MPH posted speed limit.

HEALTH

□□□ The health impacts of this project will be significant and span a decade and a half if the construction is perfectly on-schedule. The demolition of the medical buildings will likely include the removal of a multitude of materials. Generally speaking, this would include concrete, metal rebar, iron beams, asphalt, copper plumbing, sewage lines, dirt, dirt, and more dirt. The destruction of these buildings will generate large clouds of dust and air pollution that will float directly into the Torrance community right behind it. One of the things I love most about my community is the strong breezes that flow over Redondo Beach and down into my street on Tomlee Ave. I am saddened to imagine the air pollution that will now replace the fresh air I currently enjoy. This pollution will be sustained over 15 years, covering our homes, our cars, our plants, and our residents. A significant analysis needs to be performed and drastic preventative steps need to be undertaken to minimize the air pollution this construction will generate from now through 2034. Perhaps HEPA filtration needs to be implemented throughout the construction phase to ensure our neighborhood is not buried in dust and dirt.

NOISE

□□□ On a personal note, I am hard of hearing and rely on hearing aids to pick up fine conversation notes. However, my hearing loss is not so great that I will be unable to hear a constant cacophony of banging, grinding, sawing, drilling, and hammering. I understand that all manner of heavy tooling, machinery, and large earthmoving equipment will be required for this construction. I have a great concern that the noise from the construction will be a constant source of aggravation and disruption to the daily lives of the residents of our community. The children at Towers elementary will hear this noise every day in their classrooms and while at recess. The homeowners of this community will be enveloped in a constant din of construction noises, and the beeping of earthmovers backing up. The construction times will need to be limited to a restricted schedule to minimize the impact on the neighboring residents.

PRIVACY

□□□ When completed, this project claims to have a 60-foot height, offering a vast panoramic view, overlooking the neighboring communities. This is also a very great source of concern for the residents of our neighborhood. Many of us bought homes in this area recognizing the immense value of the secluded nature of this community of homes. Our neighborhood is nestled away from noise, traffic, and exudes a sense of quiet, serene, privacy. This privacy will be all but lost for many homeowners with this project as it is currently conceived. Yes, I understand there are parts of the existing structure that are higher than the proposed construction (75-feet vs 60-feet). But let us not kid ourselves here. There is a world of difference between the existing 75-foot building that is at least 100 feet away from the edge of the property and the proposed 60-foot structure built all the way to the edge of the cliff and spanning almost 1,000 feet providing an unobstructed, birds-eye view from Beryl to Prospect. This development needs to be significantly scaled back, pulled away from the edge and a privacy barrier of trees, shrubs, and other plant life needs to be planted to maintain the privacy that this community has come to appreciate.

I understand the desire for this project and what it means to the City of Redondo Beach. However, there needs to be some significant modifications and reductions in size and scope in order to make this project tolerable for all the residents of this community.

Thank you for your consideration.

Danny Fink

WRITTEN COMMENT FORM
BEACH CITIES HEALTH DISTRICT
HEALTHY LIVING CAMPUS MASTER PLAN EIR

If you would prefer to submit written comments, please complete this written comment form. Continue on the back of the form or attach extra pages, as necessary.

In order to be addressed in the Draft Environmental Impact Report (EIR), written comments must be received by the close of the public comment period at 5:00 PM on July 29, 2019.

NAME: Marian Edger

TITLE/ORGANIZATION: _____

ADDRESS: 653 19th St Manhattan Bch
(Street) (City/State/Zip)

—COMMENTS—

ME-1
There are concerns about the current bike patch used by students going to middle & high school. The parking lot entrance will be right by it.

Please hand this completed form to Wood staff at the sign-in table or mail to:

Mr. Nick Meisinger, Environmental Planner
Wood Environment & Infrastructure Solutions, Inc.
9210 Sky Park Court, Suite 200
San Diego, CA 92123

Written comments may also be e-mailed to:
EIR@bchd.org

WRITTEN COMMENT FORM
BEACH CITIES HEALTH DISTRICT
HEALTHY LIVING CAMPUS MASTER PLAN EIR

If you would prefer to submit written comments, please complete this written comment form. Continue on the back of the form or attach extra pages, as necessary.

In order to be addressed in the Draft Environmental Impact Report (EIR), written comments must be received by the close of the public comment period at 5:00 PM on July 29, 2019.

NAME: Dean Francois

TITLE/ORGANIZATION: _____

ADDRESS: Bx 1544 Hermosa Beach, CA 9254
(Street) (City/State/Zip)

- ~~COMMENTS~~
- 1 ① Serious Consideration of ~~Renovating~~ Existing Buildings
 - 0 ② Redo Prospect Ave with Bike Lanes and Fund Traffic Calming on the rest of Prospect Ave.
 - 0 ③ Consider alternative of no new assisted living units
 - 0 ④ Why is this needed? What other alternatives should the BCHD be doing?
- _____

Please hand this completed form to Wood staff at the sign-in table or mail to:

Mr. Nick Meisinger, Environmental Planner
Wood Environment & Infrastructure Solutions, Inc.
9210 Sky Park Court, Suite 200
San Diego, CA 92123

Written comments may also be e-mailed to:
EIR@bchd.org

From: EIR <eir@bchd.org>
Sent: Thursday, July 25, 2019 10:15 PM
To: Meisinger, Nick
Subject: Fw: BCHD Healthy Living Campus Master Plan - EIR Scope Meeting Comments

From: Jaime Garcia <jaimefgarcia@icloud.com>
Sent: Tuesday, July 23, 2019 2:01 PM
To: EIR <eir@bchd.org>
Cc: Apple ID <jfgarcia1@verizon.net>
Subject: BCHD Healthy Living Campus Master Plan - EIR Scope Meeting Comments

Dear Mr. Nick Meisinger,

As a 31 year resident of the Redondo Beach community directly affected by the expansion of the BCHD campus, I would like to provide you and your committee with my initial concerns:

- JG-1 | 1) 450-545 Living units is simply way to many people residing in and accessing this residential community.
- JG-2 | 2) The entire area surrounding the BCHD project is zoned R1&R 2 at best, for residential housing. This massive project will directly impact the amount of traffic on all major roads leading to/from the project. Including, but not limited to 190th St. / Flager Ln / Prospect Ave. & Beryl St., all of which are the major access roads to/from the community and beach areas.
- JG-3 | 3) The sheer logistics of housing this many new occupants AND the many visitors to this single area will greatly impact and congest the quality of living and the road ways of the thousands of residents living in this long-time bedroom community.
- JG-4 | 4) Lastly, I do not object to remodeling and enhancing of the current facility, but it must be to "scale" for the sake of all the long-time residents of the South Bay community living within a one mile radius of the proposed project. As currently proposed, this build out will certainly create a massive influx of traffic/pollution adversely affect the quality of life for the local residents. A "not so healthy living" for those of us who make this area our home.

I also believe that any EIR will truly uncover the same logistical impact this large project poses to the quality of life for the many residents of the local community.

Please do let me know that someone has reviewed and shared my concerns regarding the proposed BCHD Campus project.

Regards,

J. Garcia
Redondo Beach, CA

From: EIR <eir@bchd.org>
Sent: Friday, August 02, 2019 1:34 PM
To: Meisinger, Nick
Subject: Fw: Proposed Beach Cities Health District Project

From: Marcia Gehrt <marciagehrt@gmail.com>
Sent: Sunday, July 28, 2019 1:57 PM
To: EIR <eir@bchd.org>
Subject: Proposed Beach Cities Health District Project

Attention Nick Meisinger, Environmental Planner

M□-1 I am a concerned resident that lives at 19935 Redbeam Ave, Torrance, CA 90503. I have been reviewing the proposed plans of this project and realize the traffic, noise and health related concerns that this project will mean for us. I am a member of the Beach Cities Gym and love its convenience and classes that I attend. I am not against upgrades and improvements but given the location of the parking garage as planned and the length of time this project will take, I feel compelled to write this urgent notice of appeal.

M□-□ The area on Towers just past the stop sign on Mildred before the turn to Redbeam is filled with school traffic and young children crossing the street. The volume of traffic this project will produce will place this entire area at an even greater safety risk than already exists.

M□-□ One solution would be to prohibit a right hand turn upon exiting the parking structure of the proposed project. Another solution might be to block the use of the entrance to this residential area from Del Amo altogether. This would help everyone in these residential areas. Please rethink your garage exit and entrance and eliminate construction traffic from these residential areas.

Thank you for your consideration,.

Marcia Gehrt

Ramos, Ryan

From: EIR <eir@bchd.org>
Sent: Friday, August 2, 2019 1:55 PM
To: Meisinger, Nick
Subject: Fw: HLC EIR

From: Geoff Gilbert <geoffgilbert2248@aol.com>
Sent: Monday, July 29, 2019 5:02 PM
To: EIR <eir@bchd.org>
Subject: Fwd: HLC EIR

-----Original Message-----

From: Geoff Gilbert <geoffgilbert2248@aol.com>
Sent: Mon, Jul 29, 2019 5:00 pm
Subject: HLC EIR

- GG-1 | The EIR NOP contains very few details regarding about the project in terms of air, noise, and light pollutants and traffic from construction vehicles and equipment, as well as pollutants from
- GG-2 | demolition and construction. The illustrations of the new facility do not show the scale of the buildings from the various neighborhoods in Redondo Beach and Torrance.
- GG-3 | There is no mention of maintaining the current green space between the new facility and residential homes.

The lack of details regarding the project which will have significant environmental impacts on the immediate and distant homes, schools and businesses is surprising and makes this NOP incomplete in its format.

Regards,
Geoff Gilbert
1406 Diamond St.
Redondo Beach, 90277

WRITTEN COMMENT FORM
BEACH CITIES HEALTH DISTRICT
HEALTHY LIVING CAMPUS MASTER PLAN EIR

If you would prefer to submit written comments, please complete this written comment form. Continue on the back of the form or attach extra pages, as necessary.

In order to be addressed in the Draft Environmental Impact Report (EIR), written comments must be received by the close of the public comment period at 5:00 PM on July 29, 2019.

NAME: Linda Goldman

TITLE/ORGANIZATION: _____

ADDRESS: 2111 Speyer Ln Redondo Beach 90278
(Street) (City/State/Zip)

—COMMENTS—

I am concerned about the bicycle path & its proximity to the parking lot entrance. The bike path is the way our ^{North Redondo} children go to school to avoid the prospect of Beryl intersection. Children should not be exposed to the traffic.

LG-1

Please hand this completed form to Wood staff at the sign-in table or mail to:

Mr. Nick Meisinger, Environmental Planner
Wood Environment & Infrastructure Solutions, Inc.
9210 Sky Park Court, Suite 200
San Diego, CA 92123

Written comments may also be e-mailed to:
EIR@bchd.org

Catherine Bem

From: Meisinger, Nick <nick.meisinger@woodplc.com>
Sent: Tuesday, July 16, 2019 6:51 AM
To: EIR
Subject: FW: Healthy Living Campus

From: Leslie Dickey <Leslie.Dickey@bchd.org>
Sent: Wednesday, July 03, 2019 1:18 PM
To: Cristan Higa <Cristan.Higa@bchd.org>; Dan Smith <Dan.Smith@bchd.org>; Ed Almanza <Ed.Almanza@bchd.org>; Meisinger, Nick <nick.meisinger@woodplc.com>
Subject: FW: Healthy Living Campus

FYI

Leslie Dickey

Executive Director of Real Estate
Beach Cities Health District

Leslie.Dickey@BCHD.org

Ph: 310-374-3426, x274

Fax: 310-376-4738

www.bchd.org

www.facebook.com/beachcitieshealthdistrict

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From: Ken Grossman <kengrb@gmail.com>
Date: Wednesday, July 3, 2019 at 1:12 PM
To: Leslie Dickey <leslie.dickey@bchd.org>
Cc: Cindy Foster <Cindy.Foster@bchd.org>, Julie Lumbao <Julie.Lumbao@bchd.org>
Subject: Healthy Living Campus

Hi Leslie-

Cindy Foster suggested I contact you regarding a question I have about the Healthy Living Campus. My question is regarding parking during the construction of the Healthy Living Campus. Currently there are times that I have not been able to find a parking place when going to the Center for Health and Fitness. It is not clear how the large number of parking places that would have to be taken away during construction of all three phases is going to be replaced. What is the plan for parking during the construction over the 15 years of construction of the three phases?

Thanks

Ken Grossman

Sent from Ken's iPhone

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Re: BCHD Healthy Living Campus, proposed project

To whom it may concern:

BCHD serves Redondo, Manhattan and Hermosa Beach; consequently sent out "Healthy Living Campus" to the other cities. Our City doesn't have more room for more facilities for seniors; we with a big heart have allowed a lot of them eliminating grammar schools and contributing to the exodus of families with kids. Redondo is saturated with 7 senior complex and 2 assisted living facilities plus all over the city, board and care homes.

The irony is that in our City, for years were living many residents that are seniors now and only those are the ones that we need to take care first, particularly in emergencies.

The first responders confirmed me that the first places they will go, in disasters, are where there is a concentration of senior facilities: housing or assisted living places. But the Redondo residents: young, the ones **old as the others** and in the middle in our community that have been living here and paying taxes for years, will be left behind!

Prior to propose a project of this magnitude, that really is a concentration of the 420 units for the elderly, BCHD should have been doing a research in Redondo, as signal of respect to our residents, and also what is the situation in Hermosa and Manhattan that you serve too, regarding existing similar complex.

This is the list of existing senior housing and assisted living facilities in the city of Redondo

Salvation Army: corner of Beryl and Catalina Ave. across the Crown Plaza Hotel and next to Hotel El Redondo.

Casa de Los Amigos: by the beach, 123 S. Catalina Ave.

Seaside Village: 319 N. Broadway corner with Carnelian, across the City Hall.

Season: 109 S. Francisca Ave facing PCH, between Emerald St and Gardner St. former site of Mc Candles School demolished.

Heritage Point: 1801 Aviation Way [another school site eliminated]

The Montecito: 2001 Artesian Blvd corner with Green Ln. It is a 4 stories building [mixed use] that has affected all the properties behind.

Breathwater Village: 2750 Artesia Blvd, huge complex next to the Best Western Inn

Silverado: assisted living facility, 514 N. Prospect Ave inside the BCHD.

The Kensington: assisted living facility opened recently, 801 S. PCH location of Paterson School which was demolished.

Plus all over the City private board and care homes that have license to have certain amount of seniors.

Most of the **residents of those complex** and facilities are coming from all over the places, very **few are from Redondo.**

Giving room for this type of projects for the elderly, that they only benefit the outsiders, not our City, have changed the idiosyncrasy of our population: from a vibrant beach City where all ages were enjoying and related together, for a silent population of seniors that they are coming from everywhere. They are affecting our quality of life, our budget, putting pressure on our responders [that are paying for Redondo], to name few of the consequences. In addition are pushing families out, that we know for facts, they are moving to Manhattan or Palos Verdes Peninsula looking for better schools and more diverse community.

It has been proved all over the world that the seniors that have less chance to have dementia or Alzheimer are the ones that socialize with all different ages among the few benefits; besides that 99% like to **live and die in their own home..** BCHD should be aware of this information before move forward.

BCHD must send this 420 Residence Care for the Elderly Units to Manhattan that has only two [2] senior housing and its serve also for BCHD.

BCHD bought the corner lot of Flagler and Beryl, from a petroleum company that was pumping oil for years from that soil.

Two years have passed, but BCHD has never responded to the question regarding if the soil has been tested for toxic substances and is not contaminated. Besides if the soil is contaminated: who will pay for the cleanup? The Petroleum Company or BCHD with the money it receives from our taxes.

BCHD stated that it: "has been working with the community to reimagine our aging campus to better reflect our mission and meet the current health needs of Hermosa, Manhattan and Redondo Residents".

The above statement that sounds so good is totally a fallacy regarding both to work with the community, and the purpose of the project as I explained above. Very few people from Redondo assisted to the meetings, because they never were well promoted that every single one in the City of Redondo be aware what was behind the Healthy Living Campus. The ones that attended and push for the project in our City were residents of Manhattan Beach with the message NOT IN MY BACKYARD!

BCHD Healthy Living Campus is in reality a **concentration of 420 Residential Care for the Elderly units!!**, that they will be added to the collection that Redondo already has plus its consequences.

NO PROJECT is the only answer for the BCHD proposed project!

Redondo cannot be the dumping place of these types of projects, every city needs to share the burden, in this case in particular the others that BCHD serve!!!!

Ramos, Ryan

From: EIR <eir@bchd.org>
Sent: Friday, August 2, 2019 1:52 PM
To: Meisinger, Nick
Subject: Fw: BCHD HEALTHY LIVING CAMPUS
Attachments: FioreDeptcall to BCHD(1).xlsx

From: Marcie Guillermo <marcieguillermo@aol.com>
Sent: Monday, July 29, 2019 2:12 PM
To: EIR <eir@bchd.org>
Subject: Fwd: BCHD HEALTHY LIVING CAMPUS

Good Afternoon Madam or Sir,

This email is to officially document my concerns with the proposed project. At this time I'm requesting that NO project should be considered until a NEEDS assessment study determines Redondo Beach needs more senior/Alzheimer housing. Also, the study should evaluate the other neighboring cities contribution to provide senior/Alzheimer housing.

It is sad that this project is being sold as a healthy living campus. When we know, it is not.
MG-1 | An alternative to the project is a REAL sports park and alternative health-related services.

Who will pay for this project? Please see documents below.

MG-2 | Review the number of trips paramedics did for Silverado. How much does that cost to the taxpayers of Redondo?

Now, add the new senior/Alzheimer buildings on Knob Hill and PCH? Who will pay for the paramedics calls generated by that facility?

Why would a Health District like to inflict a financial burden on the City of Redondo?

Please also review the BCHD Agenda dated April 29, 2019 attachment: **"A Special Meeting of the Finance Committee" [read Item IX]. This item stated..."where the maximum debt of the Bonds expected to be issued for phase 1 of the Project is \$50,000,000". The project has 3 phases!!!**

Please acknowledge that you have received my comment to the EIR and the attached Excel sheet and document below.

Thanks,

Marcie Guillermo
15-year District 1 Resident @RB



TO: FINANCE COMMITTEE

FROM: MR. VISH CHATTERJI

SUBJECT: CALL TO MEETING

A Special Meeting of the Finance Committee

DATE: April 29, 2014

TIME: 6:00 p.m.

PLACE: Beach Cities
Administrative Center
1st Floor Training Room
1200 Del Arroyo Blvd
Redondo Beach, CA 90278

VIII. Presentation and Discussion:
BCHD Healthy Living Campus Update

1. EIR Update
2. Implementation Financing Strategy
 - a. Equity
 - b. Debt
 - c. Capital Campaign
 - d. Other
3. Investor/Operator Strategy
 - a. Package/Collateral
 - b. RFQ
4. Other Matters (for future meetings)
 - a. Market Study
 - b. Risk Assessment
 - c. Understanding RCFE
 - d. Other

IX. Discussion and Potential Action Items
Review and recommend approval to
549 Reimbursement from the Process
Exempt Financings from Certain Expenses
Made in Connection with the Acquisition

7/25/2019

Mr. Nick Meisinger;

Dear Sir,

We have lived in our home for the past 50 years and have the peace and comfort of a wonderful neighborhood on Mildred Ave. We raised our family and had ^{good} neighborhood schools. We are very concerned by the proposed Beach Cities Health District Project - It will change our neighborhood drastically -

This construction Project affect our quality of life. The traffic will increase through our track immensely, making it noisy and not safe for our children + grandchildren.

Along with the added pollution it will cause, it will affect peoples health.

The school is close by and the children and teachers will be affected also; noise, pollution and safety.

There are so many concerns and we ask you to seriously consider all these things in your Environmental Impact Report.

Would you want your family living here under these bad conditions?

Thank you so much -

Sincerely - Clint + Carol Hala

19514 Mildred Ave
Torrance, CA 90503

2019

Nick Neisinger
Wood Environmental and Infrastructure Solutions
9210 Sky Park Court, Suite 200
San Diego, CA 92123

Dear Sir:

□□-1 I believe that there are alternatives to the BCHD proposed plan that have less effect on the local environment. These should be fully examined and evaluated before the Healthy Living Campus (HLC) is allowed to proceed. With that in mind I am providing the following comments that should be included in the Environmental Impact Report to accurately assess the significant impacts from the Project as proposed.

□□-□ The proposed entrance/exit on Flagler will greatly increase the traffic on Towers, Redbeam, and Linda streets. The square footage increase of 331,800 square feet will almost double the present square footage of the BCHD. This means that the number of medical professionals and their patients going to and from the site daily will almost double as well. Trips by the 420 residents and visits by their family members also will increase local traffic. The EIR must assess this impact on the Torrance neighborhoods east of the proposed Project.

□□-□ One of the two proposed entry points to the facility is on Flagler Lane. This egress means that a substantial amount of this increased traffic will travel on Towers, Mildred, Redbeam and Linda streets in Torrance. These streets are part of a residential neighborhood, not designed for this increase.

□□-□ It is well documented that proximity to traffic has an adverse effect on health. See for example, <https://www.everydayhealth.com/news/how-street-you-live-on-may-harm-your-health>. The detriment to health due to this increase in traffic on Towers/Mildred/Redbeam/Linda will not be as severe as that examined by the studies in the reference, but nevertheless, it is not zero. It is not zero. This is an important point. No matter what its magnitude, there is an adverse environmental effect on health that cannot be denied and must be addressed in the EIR.

□□-□ The proposed Flagler entrance for the HSC is a design convenience, not a requirement. The site is quite large. There must be many alternatives for the location of a second egress – if a second one is actually needed at all. In effect, the Torrance community is being asked to trade off a decrease in healthfulness in exchange for a mere convenience for the developers! This is patently unfair. It is immoral. There is no fundamental need for a second egress where it is presently planned. The EIR should assess the absolute necessity for this entrance, particularly because it is not in the Beach Cities and should indicate why one or more entrances in Redondo Beach are not feasible during Phases 1 and 2.

□□-□ It is hard to understand why the BCHD planners, ostensibly chartered to improve the healthfulness of the local community, is proposing a design that in fact reduces the healthfulness of the local community it is supposed to serve. The scope of the EIR should be expanded to include an assessment of the need to burden the health of the surrounding neighborhoods in both Redondo Beach and Torrance to benefit the Beach Cities as a whole. The assessment should include a determine in this case that the ends justify the means.

Sincerely,


Lyndon and Joan Hardy
19616 Redbeam Avenue
Torrance, CA 90503

From: EIR <eir@bchd.org>
Sent: Thursday, July 25, 2019 10:18 PM
To: Meisinger, Nick
Subject: Fw: EIR & BCHD

From: Terry Hartigan <the4u@verizon.net>
Sent: Monday, July 22, 2019 4:52 AM
To: EIR <eir@bchd.org>
Subject: EIR & BCHD

Terry Hartigan
19419 Linda Dr
Torrance, CA, 90503
310-371-7180

To: Mr. Nick Meisinger
Environmental Planner
Wood Environmental & Infrastructure Solutions, INC
9210 Sky Park Court, Suite 200
San Diego, CA 92123
EIR@bchd.org

Mr. Meisinger, my wife, Eunice, and I were at the meeting (07/18/2019 - West High School) with the EIR people for the BCHD proposal. This was not one of the regular scheduled meetings, but added to accommodate the need to express our neighborhood (just west) concerns. The numbers, which were 100+, showed the interest and concerns of what BCHD is projecting. Lots of frustration coming out of the meeting, since most of us look at this as a Redondo Beach cash cow, that will only benefit BCHD, and ruin our wonderful neighborhood. For an hour after the EIR presentation, we were allowed to vent our concerns. I have fifteen pages of email notes from concerns neighbors! Forwarding is not necessary, since Mr. Bruce Steel has done so already, but our concerns were about traffic, length of time and the environment. The 90 foot wall, that will exist west of us, is a major concern, since it will eclipse our light and air, especially for the homes west and across the street from BCHD.

T-1
It seems that most traffic issues for BCHD, on the east side (Flagler), would be eliminated if all accesses and entrances were off of Prospect Ave! Like they are now!! Drive through traffic and school safety are already major problems in and for our tract!

Respectfully – Terry Hartigan



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PATRICK HENRY

19601 Tomlee Avenue
Torrance, CA 90503

310-990-3100
patrick.henry@marshall.usc.edu

July 23, 2019

Nick Meisinger
Environmental Planner
Wood Environment & Infrastructure Solutions, Inc.
9210 Sky Park Court, Suite 200
Sand Diego, CA 92123

Re: Beach Cities Health District Project

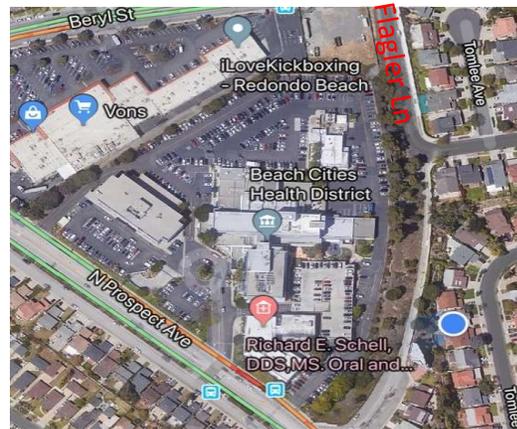
Dear Mr. Meisinger:

The impact of this project will be felt by the residents of Torrance, which don't seem to be a concern to the Redondo Beach planners!

- 1 Those of us who live on Tomlee Avenue in Torrance will be impacted by the multi-year construction project as we are consistently **“downwind”** of Redondo Beach. The two pictures show the proximity of my house and the project, less than 50 yards. In Picture 2 my house is denoted with the 'blue dot'.



Picture 1



Picture 2

- **Potential Asthma Inflammation** - As an asthma sufferer the constant flow of dust and other construction particulates will invade my surroundings.
- **Traffic Congestion & Access** - Flagler Ln. is the only access to our part of Tomlee from the north (Picture 2). During construction it is likely to be closed, at least part time.
- **Impact on Pool** – As you can see in Picture 2, I have a pool that will be constantly inundated by the residue of nearby construction. If this project does begin, I am expecting to be compensated.

My Torrance neighbors and I feel that the environmental impact on our lives should be considered!

Sincerely,

Ramos, Ryan

From: EIR <eir@bchd.org>
Sent: Friday, August 2, 2019 1:31 PM
To: Meisinger, Nick
Subject: Fw:

From: Agustin Hernandez <gusandlaurie@gmail.com>
Sent: Saturday, July 27, 2019 1:31 PM
To: EIR <eir@bchd.org>
Subject:

LH-1 | We are against closing down and redeveloping Silverado Senior Asst Living. As well as the old South Bay hospital.

Laurie Hernandez

Dear Nick,

EHD-1

I live in Torrance, the neighborhood east/southeast of BCHD. Let me start out by saying I am not opposed to the Senior Living Center. I have a grandmother who is in a facility. One of my concerns is the size of the facility for the space. The living center's height and width while sitting on a hill does not match the surrounding neighborhood and landscape.

Communication

EHD-2

- This neighborhood will be affected dramatically. Why is only a 1/2-mile radius of Torrance being notified about the meeting? It will affect nearly 2,800 students total between Towers Elementary School and West High School (I chose to only include the closest schools). West Torrance will not be able to benefit from this project the way the beach cities will. Yet, 90% of the issues affect us and our children. Why are we not getting the communication as effectively as the surrounding cities?
- Towers Elementary School has approximately 620 students. West Torrance High School has 2,050 students. That's a total of almost 2,800 students. Has the Torrance Unified School District been notified of this project?

EIR Concerns

Air Quality

EHD-3

- Neighborhood pollution concerns for children and seniors. Many children in the neighborhood suffer from Asthma. The debris from the project affecting the local neighborhood children, school children (Towers 620 kids), and the child development center on the facility.

EHD-3
cont.

- Events at Towers Elementary that are outside that can & will be affected by the construction: physical education, Track Meets, Friday assembles in the mornings, Awards Assemblies, Halloween Parade, Bike Rodeo and graduation.
- Concern for the seniors. The neighborhood has a senior on oxygen tanks. We are concerned that their golden years will be spent dealing with more health issues due to air quality/pollution.
- The neighborhood South of BCHD loves their ocean breeze. With this breeze, the neighborhood will get the dirt, dust, heavy machinery pollution, etc.

Transportation

EHD-4

- Traffic flow from Flagler to Del Amo Blvd (via Towers Street, Redbeam Avenue and Mildred Avenue).
- Traffic counts need to be done during school drop off & pick up times during the normal school year; not during summer. Traffic counts outside of that time-frame are not a true reflection of the neighborhood's traffic behavior. Optimal times are from 7:30 am to 9:30 am. This will give a real-world view of what morning traffic is currently like during commute times. School gets out between 2:50 pm and 3:10 pm. The best traffic count times are from 2:30 pm to 3:15 pm.
- We request additional traffic counts during evening commute times; suggested times are 5:00 pm to 7:00 pm. I would include counters on Redbeam Avenue and Mildred Avenue during these times. Cars cut through the entire neighborhood as a shortcut from Flagler Lane to Del Amo Blvd and vice-versa.

EHD-5

- What routes will construction vehicles be asked to use during this 10-year process?

Aesthetics

- EHD-6
- The corner of Flagler & Beryl. Is there a way to shift the design? Torrance home owner (home values sales are over a million dollars) are now getting the parking deck as well as the exit. Beryl is getting the pretty landscape and esthetics. Across from Beryl, 80% of what you are seeing are rentals. The renters in Redondo get the beautiful landscape. I would love to see if the design can be rotated in a way so the homeowners get a better view.
 - Homeowners on Tomlee Avenue have 2 concerns: First, they have to now look at a cement wall in their backyard. The parking deck will be their new view. Secondly, they will now not get the air flow or the amount of sunshine they currently enjoy.

Water Quality

- EHD-7
- I am very concerned about the water runoff from this project during construction. The water will run downhill causing water build up and possible flooding for the Torrance homeowners. What has been looked at to help prevent this from happening?
- EHD-8
- Once the assisted living apartments are completed, you now have 360 units, a cafeteria, a child development center, beautiful landscaping and the remaining campus. Where is this facility getting its water supply from? Will this affect the Torrance residents below? Will we have the same water supply and quality that we have now?

Construction on this project will last at least 10 years. Anyone that has built a home or done construction knows construction jobs always require more time than initially called for.

These are just a few of my concerns. I wanted to pick the ones that I feel are most important: Air Quality, Traffic, Water Quality and Aesthetics. These are in no particular order. I think communication and

partnering with your Torrance neighbors on this project will be extremely beneficial. Many of us are not completely against the project.

A point I have to make that is not a statistic, but a fact. These days, when you buy a house, most people are so busy, they don't get to know their neighbors. The neighborhood south of BCHD is a community. A neighborhood that ranges from newborns to those in their late 80's. There are people of diverse backgrounds; neighbors are Asian, African American, Latino, Middle Eastern and Caucasian. Religious backgrounds are just as diverse. We know our neighbors. We take in/out the trash, pick up the newspapers and mail when they are out of town. We take care of their pets like we would our own. We watch each other's children. We help with their families in a time of need. When you move into this neighborhood you get a community that truly supports and cares for each other. You cannot put a price tag on this small neighborhood. We live in a world that is changing in so many positive ways. Please don't change ours for the worse!

The last thought I'd like to leave you with. If this project was happening in your neighborhood, whether you lived 2 blocks or 2 miles away, would you be okay with the amount of time you had deal with the construction and all the other issues that will come along with it? I believe your answer would probably be "No". So why are we not going back to the drawing board and coming up with better plan?

Sincerely,

Erin Hicks Dawson

5615 Towers Street
Torrance, CA 90503

WRITTEN COMMENT FORM
BEACH CITIES HEALTH DISTRICT
HEALTHY LIVING CAMPUS MASTER PLAN EIR

If you would prefer to submit written comments, please complete this written comment form. Continue on the back of the form or attach extra pages, as necessary.

In order to be addressed in the Draft Environmental Impact Report (EIR), written comments must be received by the close of the public comment period at 5:00 PM on July 29, 2019.

NAME: MATTHEW HINSLEY

TITLE/ORGANIZATION: _____

ADDRESS: 1103 STANFORD AVE REDONDO BEACH, CA 90278
(Street) (City/State/Zip)

—COMMENTS—

THE SCOPING OF THE EIR IS A CRITICAL ASPECT TO THIS PROPOSED PROJECT AND MAY GREATLY IMPACT THE SMOOTH LAUNCH OF THIS PROJECT. EIR SHOULD LOOK AT EACH PHASE OF THE PROPOSED PROJECT SEPARATELY AND EVEN COMMIT TO MAKE PHASE 2 AND PHASE 3 ADJUSTMENTS BASED ON PHASE 1. IT IS

KNOWN CEQA HAS STRICT LIMITS ABOUT TRAFFIC AND ASSUMPTIONS. PLEASE GO ABOVE AND BEYOND THE CEQA MINIMUM TO PROVIDE ACTUAL TRAFFIC DATA IN

THE FUTURE. SPECIFICALLY WITH NEW HOUSING OPENING AND RB GALLERIA IN 2022

MAY IMPACT TRAFFIC FOR THE WHOLE CITY, WHILE BCHD SERVES THE WHOLE SOUTH BAY BUT LIVING WITH 420 HOUSING UNITS WILL SERVE MANY BUT NEGATIVELY

IMPACT THOSE RB

PERSONALLY I WANT

WITH AGING PARENTS

AND THINK IT IS A

ALL THAT STARTS

Please hand this completed form to Wood staff at the sign-in table or mail to:

Mr. Nick Meisinger, Environmental Planner
Wood Environment & Infrastructure Solutions, Inc.
9210 Sky Park Court, Suite 200
San Diego, CA 92123

Written comments may also be e-mailed to:
EIR@bchd.org

RESIDENTS NEAR BCHD.

THIS PROJECT TO SUCCEED AND YOUNG CHILD AT HOME

GOOD RE-IMAGINING THESE.

WITH SCOPING THE EIR

TO IDENTIFY, AT EACH PHASE INDEPENDENTLY, NEGATIVE ENVIRONMENTAL IMPACTS OF THE PROPOSED HEALTHY LIVING CAMPUS MASTER PLAN. START RIGHT AND RECEPTIVE TO THE IMPACTS TO REDONDO BEACH RESIDENTS.

MH1-1

MH1-2

Ramos, Ryan

From: EIR <eir@bchd.org>
Sent: Friday, August 2, 2019 1:26 PM
To: Meisinger, Nick
Subject: Fw: BCHD Healthy Living Campus Master Plan Scoping EIR Comments

From: Matthew Hinsley <matthewcolin@gmail.com>
Sent: Thursday, July 25, 2019 9:09 PM
To: EIR <eir@bchd.org>
Subject: BCHD Healthy Living Campus Master Plan Scoping EIR Comments

Hello,

I attended the public EIR scoping meeting held on Monday July 15, 2019 in Redondo Beach and I provided written comments at that meeting.

Upon further deliberation and review I would like to add an additional comment about the scoping of the upcoming EIR. My additional comment is:

MH2-2 "My first and main comment is that because this project is proposed in 3 phases over 15 years I implore the Beach Cities Health District (BCHD) to commit to and ultimately conduct a new EIR for each phase of the mast plan. Conducting one EIR to use throughout the 12 years before the start of Phase 3.

This is the only way I can see for the community to ultimately accept the impacts or the mitigation of the impacts that the EIR brings to light.

MH2-3 More specifically, each phase of the project needs to be examined in two parts, the impacts of the construction and the impacts of each phase of the project itself.

So each Phase has associated construction and the project itself once completed. Please consider each separately and address those in each of the 3 EIR.

MH2-4 When studying traffic in the EIR please consider construction phases and the project phase. Traffic is a huge issue in Redondo Beach where this project is.

Please present the traffic data both in Level of Service (car trips) and in newer modeling Vehicle Miles Traveled (VMT). You will likely need to do additional traffic studies after the first studies.

The community wants to know a lot of specifics. If the data is Level of Service (car trips). Are those AM, PM, north, south, etc. Please prepare for this additional data.

MH2-5 Another concern is the impact to fire, ambulance, emergency services that will be solely the burden of Redondo Beach. Consider negating or improving the use of those services as an impact as a result of this project. Adding potentially up to 420 housing units is a large concern and especially the persons there will require more than average emergency care.

Please remember that this step of scoping the EIR is seen by residents as a way to avoid controversy or resolve controversy early in the process."

Thank you,

Matthew Hinsley

Redondo Beach, CA

Ramos, Ryan

From: EIR <eir@bchd.org>
Sent: Tuesday, August 13, 2019 12:04 PM
To: Meisinger, Nick
Subject: Fw: Healthy Living Campus - General question

-----Original Message-----

From: Matthew Hinsley <matthewcolin@gmail.com>
Sent: Monday, July 29, 2019 8:54 AM
To: HLCInfo <HLCInfo@bchd.org>
Subject: Healthy Living Campus - General question

Hello,

My name is Matthew Hinsley and I am a resident of Redondo Beach.

I recently attended a meeting in Redondo Beach on the scoping of the EIR for the new BCHD Healthy Living Campus.

In general I am supportive of the project and the new direction of BCHD. Apart from the EIR, I had a general question about the HLC project.

MH3-1 | Who is funding the EIR and paying for the 3rd party company to prepare the EIR?

Thank you,

Matthew Hinsley

From: EIR <eir@bchd.org>
Sent: Thursday, July 25, 2019 10:26 PM
To: Meisinger, Nick
Subject: Fw: 515 prospect potential project

From: Mike Hirsh <mike@lastagecall.com>
Sent: Tuesday, July 23, 2019 8:07 PM
To: EIR <eir@bchd.org>
Subject: 515 prospect potential project

Hello EIR folks,

While I am not opposed to the concept of this project, I am very concerned about what the effect on local traffic will be.

Presently both Beryl and 190th as well as Prospect can be quite congested at any time, but particularly when school is dropping off or picking up.

My ultimate question is just how will the extra traffic from this project be mitigated to not make the locals finding themselves stuck in gridlock traffic?

Respectfully Yours

Michael Hirsh
527 North Lucia Ave.
Redondo Beach Ca. 90277

Ramos, Ryan

From: EIR <eir@bchd.org>
Sent: Friday, August 2, 2019 1:30 PM
To: Meisinger, Nick
Subject: Fw: EIR comments for the BCHD project

From: Jack Holman <Jack.Holman@airnz.co.nz>

Sent: Saturday, July 27, 2019 8:13 AM

To: EIR <eir@bchd.org>

Cc: OMartinez@torranceca.gov <OMartinez@torranceca.gov>; A Cheung <acheungbiz@gmail.com>; Aileen Pavlin <arpavlin@gmail.com>; Alice Wu <a64011@yahoo.com>; Anna & Santiago Santana <santiana@verizon.net>; Bill Shanney <wshanney@verizon.net>; Bob Ronne <r.ronne.apc@gmail.com>; Bruce Szeles <bruce.szeles@gmail.com>; Candy Yarborough <Yarborough@me.com>; Chad Butzine <ChadB@ascotlimousine.com>; Dah-Weih Duan (Sherry Hsieh <dahweih@gmail.com>; Danny & Tara Fink <iamfinky@yahoo.com>; Dave Dillard (Linda <mail@davedillard.com>; Ed Arnn <edarnn@earthlink.net>; Eddie Choy <edchoy01@gmail.com>; Ellie Reid <loicy@aol.com>; Erin Hicks <erin@hicksfamily.com>; Frank Briganti <fjbriganti@aol.com>; Frank von Coelln <von@earthlink.net>; Gary Teraoka <Mr-Rocky@socal.rr.com>; J Scott <jscott006@socal.rr.com>; Jack Holman <Jack.Holman@airnz.co.nz>; James & Janice Clark <james.clark3@verizon.net>; Jan & Scott Vogt <janpug@verizon.net>; Jan McDonald <jantana11@hotmail.com>; Jerry & Irmi Lake <jmlake7@aol.com>; Jill and Mike Conover <jillconover@gmail.com>; Joan Hardy <joantareshhardy@gmail.com>; Joann Arnn <joarnn@earthlink.net>; Joyce Stauffer <jostauffer@verizon.net>; Kathy Merkovsky <kmerkovsky@hotmail.com>; Linda Choy <ljochoy416@gmail.com>; Linda Feldman <imalinda@aol.com>; Lisa Limm <lclimm@yahoo.com>; LuJean Levy <levyclann@aol.com>; Lynn Hardy <lyn.hardy@gmail.com>; Lynne & Tim Meehan <ltkatmee@gmail.com>; Mari Ramskill <mari.ramskill@gmail.com>; Maria Mocega <mocemom@yahoo.com>; mdgapg <mdgapg@verizon.net>; Michelle Eisenberg <micheisen@msn.com>; ninjabytes <ninjabytes@hotmail.com>; Phil Yarborough <pyarborough@me.com>; Phillip (Diamond <p4ew@aol.com>; Raymond Johnson <rjohnson839@verizon.net>; Rich Matsui <rtmatsui@socal.rr.com>; Rick and Joan <joanrickca@gmail.com>; Robin & Alan Arehart <ararehart@yahoo.com>; Sabrina Barakat <sabsinla@hotmail.com>; Sandy Williamson <sjmwilliamson@hotmail.com>; Scott Vogt <gsvogt@verizon.net>; Seb Sarkisian <srsark1@msn.com>; Stephanie Ishioka <sishioka@yahoo.com>; Stephen and Scarletta <stevebillis@outlook.com>; Steve Ramskill <sramskill@decurion.com>; Steve Saber <backsaber@aol.com>; stffieri <stffieri@hotmail.com>; Tamiko Sato <tammytammysugar@gmail.com>; teresa steele <tastele1950@gmail.com>; Terry Hartigan <the4u@verizon.net>; Tim Ozenne <tozenne@gmail.com>; Vim Childers <kinders3@verizon.net>; Wally Hesper <whesper@verizon.net>; scott006@socal.rr.com <scott006@socal.rr.com>; Jeff Earnest <jeff.earnest1@gmail.com>; A W <annbrianw@gmail.com>; Ken <ksyano@verizon.net>

Subject: EIR comments for the BCHD project

Mr. Nick Meisinger,

I am a concerned citizen of the city of Torrance. I live on Redbeam Ave, and want to add my voice to the other residents about the proposed hospital and Residential Living project.

I share my outrage that this project will be using the infrastructure of Torrance for the construction thoroughfares, and for the resulting additional traffic at the projects conclusion. I can't believe we're looking at 12-15 years of this disruption to the serenity of our neighborhood.

JH-1

I have the same concerns about environmental pollution (affecting at least 2 high schools and 2 elementary schools) dust, noise, increased traffic, probable release of terrestrial contaminants long since dormant (my area, east of Tomlee, was once a pig farm and agricultural area) on which DDT was likely used a pesticide.

JH-2

I am certain that the water runoff from not only the construction process, but also from the rain will negatively affect the Torrance residents, and NOT affect the beach cities at all, since we are directly downslope, that runoff will literally land at our front doorsteps.

JH-3

I am also concerned with the electrical grid in our area. Having lived on Redbeam for 15 years—we have already experienced at least 3 blackouts, lasting more than 24 hours, due to deteriorating infrastructure. How much more stress will the entire complex’s electrical consumption cause on our neighborhood?

For us Torrance residents, there is NO upside.

If you can guarantee a change in the prevailing winds, and that none of the 3000+ trucks we were told to expect would come down Flagler and use Redbeam (the only through route from Beryl to Del Amo) I still wouldn’t like it. I agree with my Torrance neighbors on all of the concerns they have raised, many that I have not listed here, so I don’t feel the need to list them again.

I have also been in attendance to one of the many EIR meetings, and other issues and subjects came up which will also negatively impact our neighborhood, but with respect to the scope of this report, this is all I have to say.

Sincerely,
Jack Holman
19414 Redbeam Ave

Jack Holman Cgo Ops Spvr | Business Support P. +1 310 646 8204 E. Jack.Holman@airnz.com

From: Susan Earnest <susanearnestrealtor@gmail.com>
Sent: Friday, July 26, 2019 6:06 PM
To: litespeedmtb1@verizon.net
Cc: A Cheung <acheungbiz@gmail.com>; Aileen Pavlin <arpavlin@gmail.com>; Alice Wu <a64011@yahoo.com>; Anna & Santiago Santana <santiana@verizon.net>; Bill Shanney <wshanney@verizon.net>; Bob Ronne <r.ronne.apc@gmail.com>; Bruce Szeles <bruce.szeles@gmail.com>; Candy Yarborough <Yarborough@me.com>; Chad Butzine <ChadB@ascotlimousine.com>; Dah-Weih Duan (Sherry Hsieh) <dahweih@gmail.com>; Danny & Tara Fink <iamfinky@yahoo.com>; Dave Dillard (Linda) <mail@davedillard.com>; Ed Arnn <edarnn@earthlink.net>; Eddie Choy <edchoy01@gmail.com>; Ellie Reid <loicy@aol.com>; Erin Hicks <erin@hicksfamily.com>; Frank Briganti <fjbriganti@aol.com>; Frank von Coelln <von@earthlink.net>; Gary Teraoka <Mr-Rocky@socal.rr.com>; J Scott <jscott006@socal.rr.com>; Jack Holman <Jack.Holman@airnz.co.nz>; James & Janice Clark <james.clark3@verizon.net>; Jan & Scott Vogt <janpug@verizon.net>; Jan McDonald <jantana11@hotmail.com>; Jerry & Irmi Lake <jmlake7@aol.com>; Jill and Mike Conover <jillconover@gmail.com>; Joan Hardy <joantareshhardy@gmail.com>; Joann Arnn <joarnn@earthlink.net>; Joyce Stauffer <jostauffer@verizon.net>; Kathy Merkovsky <kmerkovsky@hotmail.com>; Linda Choy <ljochoy416@gmail.com>; Linda Feldman <imalinda@aol.com>; Lisa Limm <lclimm@yahoo.com>; LuJean Levy <levyclann@aol.com>; Lynn Hardy <lyn.hardy@gmail.com>; Lynne & Tim Meehan <ltkatmee@gmail.com>; Mari Ramskill <mari.ramskill@gmail.com>; Maria Mocega

WRITTEN COMMENT FORM
BEACH CITIES HEALTH DISTRICT
HEALTHY LIVING CAMPUS MASTER PLAN EIR

If you would prefer to submit written comments, please complete this written comment form. Continue on the back of the form or attach extra pages, as necessary.

In order to be addressed in the Draft Environmental Impact Report (EIR), written comments must be received by the close of the public comment period at 5:00 PM on July 29, 2019.

NAME: MIKO HOYER
TITLE/ORGANIZATION: RESIDENT
ADDRESS: 2821 MAY AVE REDONDO BEACH CA 90278
(Street) (City/State/Zip)

—COMMENTS—

1) ~~THE~~ WHAT IS THE IMPACT OF STORMWATER RUNOFF/MANAGEMENT? REDONDO BEACH MADE SOME IMPROVEMENTS TO MITIGATE ~~THE~~ FLOODING BY ~~THE~~ ELEMENTARY SCHOOL THAT PERIODICALLY OCCURRED DURING STORMS. THE SUBTERRANEAN PARKING LOT AND ~~THE~~ PAVING OF FLAGLER SEEM TO POSSIBLY HAVE IMPACT ON STORMWATER FLOW MANAGEMENT.

Please hand this completed form to Wood staff at the sign-in table or mail to:

Mr. Nick Meisinger, Environmental Planner
Wood Environment & Infrastructure Solutions, Inc.
9210 Sky Park Court, Suite 200
San Diego, CA 92123

Written comments may also be e-mailed to:
EIR@bchd.org

MH4-1

July 25, 2019

Wood Environment & Infrastructure Solutions
9210 Sky Park Court
Suite 200
San Diego, CA 92123

Attention: Mr. Nick Meisinger, Environmental Planner

Re: Public Comments on Proposed BCHD Expansion Project

Dear Mr. Meisinger:

It is my understanding that you are involved in the process of completing the scoping review and required analysis preliminary to the preparation of that Environmental Impact Report ("EIR", in any form) which will assess the viability of the Beach Cities Health District ("BCHD") proposed expansion of their campus located in Redondo Beach, CA, as outlined in their June 27, 2019 "Notice of Preparation" ("NOP") document.

I am a resident and homeowner on Tomlee Ave near the site of the proposed BCHD project. I have the following concerns regarding this development project. My concerns are as follows:

- 1) I am worried about the health effects during the construction of this new project. Since South Bay Hospital operated for many years between 1960 and 1980, the site likely has buried medical toxic waste that will be exposed during the construction and digging phase of the project. This waste could cause airborne contamination that will easily travel into my neighborhood since it is east of the construction site and the prevailing ocean winds blow to the east.
- 2) During general construction, there will be many heavy trucks traveling around the neighborhood presumably using Del Amo Blvd and Prospect Ave. The persistent noise and vibration from these heavy vehicles will be a continuing irritant to nearby residents over extended periods (months / years) for the duration of the construction project which will last for 15 years.
- 3) If the Flagler Ln parking structure driveway is built, the traffic flow will be greatly increased coming into the neighborhood on Flagler Ln, Towers St, and Redbeam Ave. Exit from the neighborhood to the north using Flagler Ln or to the south using Redbeam Ave will become more difficult due to the increase in traffic congestion. More traffic may lead to more crime in the neighborhood as well since there will be more look-li-loos passing through. Can this proposed Flagler Ln driveway be moved to the much higher traveled Prospect Ave, instead?
- 4) The proposed parking structure driveway on Flagler Ln, will also affect nearby Towers Elementary School daily school children drop-off and pick-up on Towers St. The significant increase in traffic will affect the safety of parents and children during drop-off / pick-up times.
- 5) Property values will drop considerably during construction according to a local real estate agent. This will be due to the noise from heavy vehicles in the area, additional pollution from vehicles and legacy building demolition. Why do our property values have to be suppressed for over a decade? After construction, the increased traffic on Flagler Ln, Towers St, Redbeam Ave will permanently suppress home values on / near those residential streets.
- 6) The final layout of the BCHD project looks massive. It appears overly grandiose and large compared to structures immediately surrounding it, including nearby apartment buildings and



the many single family homes in the immediate area. The grand scale doesn't 'fit' the neighborhood. Why must the new complex be so large? Can it be scaled down in size?

- 7) The years of peace and quiet that I have enjoyed in my neighborhood for the past several decades will be dramatically impacted from the construction noise and additional traffic.

Please take my concerns into consideration. Thanks for your time.

Sincerely,

Chiaki Imai

Home Maker

Torrance Homeowner and Resident

Ramos, Ryan

From: EIR <eir@bchd.org>
Sent: Friday, August 2, 2019 1:38 PM
To: Meisinger, Nick
Subject: Fw: BCHD Expansion Project - EIR Comments

From: Stephanie Ishioka <sishioka@yahoo.com>
Sent: Monday, July 29, 2019 10:09 AM
To: EIR <eir@bchd.org>
Cc: omartinez@torranceca.gov <omartinez@torranceca.gov>
Subject: BCHD Expansion Project - EIR Comments

Re: BCHD Healthy Living Campus Master Plan EIR

Mr. Nick Meisinger:

SI-1 Torrance is a wonderful city to live in, especially West Torrance to be exact, in the Pacific South Bay tract on Tomlee Avenue. Our community enjoys the sea breeze from the Pacific Ocean and the marine layer at times making our neighborhood's weather ideal all year. In addition, our award winning Towers Elementary School, Bert Lynn Middle School and West Torrance High School makes our neighborhood tract one of the most sought after places to live in. But not only for young families to live in but also for the elderly.

With the Beach Cities Health District construction project occurring over a fifteen (15) year period, it will disrupt our wonderful neighborhood and I have these concerns:

SI-2 Towers Elementary School is located nearby and downwind of the project and with the school kids outside for recess and lunch and also going to and from school, how will all the construction dust affect these kids, their parents and the neighbors? There will be fifteen (15) years of this dust from the demolition and construction and we won't know what kind of allergies or health problems will affect our community.

SI-3 There will also be increased traffic flow with big construction trucks and construction employees getting to and from the job site. Then there is the proposed entry/exit of the subterranean parking structure from Flagler Ln. which will also add to the increase of traffic flow once construction is complete. Waze and other traffic apps are leading more traffic through our neighborhood - Del Amo Blvd. to Redbeam Ave. to Towers St. to Flagler Ln. and reverse. With increased traffic will most surely lead to increased accidents and incidents. N Beryl St. is the point of entry for drop-off and pick-up for Towers Elementary School and there is also a "back gate" for drop-off and pick-up on Towers St. The safety of the school kids is a major concern.

SI-4 The buildings being built are stated as only to be 60 feet high yet they are pushed to the perimeter of the property thereby making them appear taller than the existing buildings on the property. As it is now during standard time or winter time, the existing buildings block the natural sun and it begins to darken in our neighborhood around 4-4:30pm and with these newly constructed tall buildings, it will

darken earlier and thus, we will need to use more electricity. Will the BCHD compensate our neighborhood for the added increase in our electricity bill? The tall buildings will also block our sea breeze. Would each resident need to purchase air conditioning? Another added expense.

SI-5 | Privacy will also be a concern with this massive building and its occupants peering into our homes and backyards.

SI-6 | The noise and vibration are also concerning. My house on Tomlee is the first street to the east of the proposed BCHD campus and we will have to endure fifteen (15) years of noise and vibration. That is a long time. My backyard is on a slope. Will all that vibration for fifteen (15) years cause my backyard to come crashing down into my house?

I stand united with my Torrance neighbors. BCHD and the City of Torrance needs to work towards an agreeable solution for all involved. Thank you for your time and consideration.

-Stephanie Ishioka
19000 block of Tomlee Avenue

July 26, 2019

Nick Meisinger
Environmental Planner
Wood Environment & Infrastructure Solutions
9210 Sky Park Court, Suite 200
San Diego, Ca 92123

Dear Nick Meisinger:

I am a long-time resident of Redondo Beach and I have many concerns regarding the proposed Healthy Living Campus Master Plan. The Beach Cities Health District is supposed to be promoting Blue Zones but this Health Living Campus Master Plan is not healthy for the Redondo Beach and Torrance communities and should be called the Toxic Zones Master Plan given what you will be subjecting the beach community to.

I have many concerns and a few suggestions. If this plan has to do with community health then
BJ-1 | downsize the construction projects. The scale of this project is way too big and does not fit with the
BJ-2 | aesthetics of the community. All the construction that you are proposing will subject the beach
BJ-3 | community to particulates coming into our homes and schools which will pose health hazards and
breathing difficulties to everyone during all the phases of construction over 15 years. In addition,
the traffic on 190th and Prospect will be terrible and the noise will impact schools and our
residential communities.

I also object to putting 420 assisted living facilities on this campus. Companies in the business of assisted living should buy property elsewhere and compete with the new Kensington and other facilities already in the area. The Healthy Living Campus is not the place for these facilities.

I support keeping the gym and offering grassy areas which should be grass not turf. What I envision is something closer to what they did when the Aviation High School was closed. The community got the running track and a large grassy area in the middle where community soccer and football games are played. The community also got to keep the gym with indoor basketball courts and the High School auditorium which became the Performing Arts Center.

I would also like to see outdoor exercise equipment installed for use by the community similar to what I've seen in the Kenneth Hahn Recreation Park with the Fitness Par Courses. It has ten station workout courses. I would like to see exercise workout equipment throughout the Healthy Living Campus and green areas where people could meet outdoors for yoga and other activities. These workout areas would benefit all the residents of Torrance, Redondo Beach, Hermosa Beach, and Manhattan Beach and would support the concept of BLUE ZONES.

Sincerely,

Bethany Johnson

Redondo Beach resident

Ramos, Ryan

From: EIR <eir@bchd.org>
Sent: Friday, August 2, 2019 1:52 PM
To: Meisinger, Nick
Subject: Fw: BCHD Comments from Torrance resident of Pacific South Bay Community

From: Raymond Johnson <rjohnson839@verizon.net>
Sent: Monday, July 29, 2019 2:48 PM
To: EIR <eir@bchd.org>
Cc: OMartinez@torranceca.gov <OMartinez@torranceca.gov>
Subject: BCHD Comments from Torrance resident of Pacific South Bay Community

Irene K. Johnson
19521 Mildred Ave.
Torrance, CA 90503
July 28, 2019

By First Class Mail and E-Mail
Wood Environment & Infrastructure Solutions
9210 Sky Park Court
San Diego, CA 92123

Attention: Mr. Nick Meisinger, NEPA/CEQA Project Manager

Re: Public Comments on Proposed BCHD Expansion Project

Dear Mr. Meisinger,

As a Torrance homeowner in the Pacific South Bay Community tract of homes for the past 43 years that will be directly impacted by the proposed BCHD expansion project, I feel it is vitally important that you know how not only myself but most all residents of this community feel about this enormous project. This neighborhood is truly special. It is close to the beach with fresh sea breezes, wide, quiet streets, within walking distance to the grocery store, the schools, and has many residents who have lived here since the tract originated in 1969. Many, many homeowners are elderly now, over 70 years old, and have chosen to live out their retirement years in this lovely location because it would be hard to find a better place to live at this stage

of life. Others are young families with school age children who have chosen this area specifically for the same reasons and because of the excellent schools, all three of which are within walking distance. These are all families who have contributed significantly not only to the City of Torrance, but also to the whole South Bay Area, the State of California and our entire country and world. Numerous aerospace engineers, doctors, lawyers, business owners, teachers, former school board members, retired military personnel, community volunteers, and the whole gamut of professions make up the fabric of this neighborhood. We actively participate in all elections and are a well-informed, educated community. We care deeply about issues and developments that affect all our lives. It is with this perspective that I would like to share my concerns about this project. They are:

SCALE OF PROJECT:

IJ-1 | This project is simply way too large for the surrounding residential communities that border it. As proposed, the residential living units would tower over our homes blocking out sunlight and sea breezes. It would change the feeling we have of living in a quiet, secluded neighborhood to one of a feeling of living in a city, closed in, surrounded by towering buildings. The project needs to be significantly scaled back for all communities concerned.

TRAFFIC:

IJ-2 | In the past few years, residents have experienced a significant increase of traffic down Flagler Lane through Redbeam and Mildred Avenues, especially during school drop-off and pick up times at the back entrance to Towers Elementary School. There are many parents parking along these streets during these hours, often double parking and hurrying to do so. This already has created a great deal of danger for the children and residents alike. You take your life in your hands to cross the street during these hours. We also have had at least two traffic accidents on Redbeam Avenue in the past couple of years due to automobiles speeding and cutting through this tract from Flagler to Del Amp Blvd. The stop signs are also usually ignored by non-residents, another danger.

The proposed project plans to put the entrance to the new BCHD from Flagler lane. Flagler lane belongs to the City of Torrance and Torrance residents should decide how this street is used. Most residents of the neighborhood use the Flagler lane exit daily. There are also two blind corners on Flagler lane. We DO NOT WANT an entrance/exit to the BCHD from Flagler lane. It would result in unbearable traffic cutting through our neighborhood to get to the BCHD, increase the danger to anyone walking and especially to the school children. All entrances to this project should be from Prospect Avenue only. To even design this project as it is shows great insensitivity to our community.

IJ-3

The amount of traffic that will be necessary by the thousands of trucks and other vehicle coming and going from this project for 15 years is unimaginable. And which routes to and from the projects are they likely to take? Probably right past Towers Elementary school or through our tract of homes. This is completely unacceptable.

HEALTH:

IJ-4

I am deeply concerned about the impacts to our health that this project will create. The existing hospital building was built ages ago when asbestos was commonly used. The demolition fall of these buildings will generate huge amounts of toxic dust and chemical particles in the air, only 100 feet from our backyards and Towers Elementary school, which couldn't be worse for the elderly and school age children. And to think the construction of this project is to last for 15 years is beyond my comprehension. Think of this, 15 years of living in a construction zone breathing toxic air, trying to endure the choked traffic congestion, incredible, non-stop noise pollution. These are seriously dangerous health hazards that no one should have to endure, yet let alone the elderly and school age children.

IJ-5

NOISE:

IJ-6

As mentioned earlier, this neighborhood is often very quiet and peaceful during the daytime hours. It is very peaceful to live here. The proposed project could completely destroy the quality of life we have all chosen this neighborhood for and to live out our retirement years in. The horrible noise that will be generated by 15 years of non-stop demolition and construction sounds is almost unbearable to even think about. Non-stop noise greatly affects a persons stress levels. The residents of this neighborhood do not deserve to have to live under such conditions for any amount of time, yet let alone for 15 years!

MISCELLANEOUS CONCERNS:

IJ-7

I believe there will be increased costs the the City of Torrance may not be fully aware of. Robert R. Ronne has addressed these well in his letter. They include increased for the use of services the may occur for the Torrance Fire and Police Departments. And the Torrance taxpayers pay for these services.

IJ-8

Mr. Ronne has also pointed out the potential depleting of the aquifers for a project of this enormous size and duration. We have all sacrificed during this period of drought and would continue to do so. I share Mr. Ronne's concerns and think they should be thoroughly researched and addressed well before starting any project.

I believe the BCHD envisions creating a new, improved Healthy Living facility that serves the Beach Cities with many services while simultaneously providing a large number of assisted living

units that will generate a great deal of money for the City of Redondo Beach. But to accomplish this goal I believe the BCHD is creating the exact opposite for the residents of this community and the other communities/neighborhood that border it, namely, a long-term, VERY UNHEALTHY LIVING environment. In the Sunday, July 29 edition of the Daily Breeze, Mr Tom Bakaly, the health district's CEO, stated "We are an organization who's goal is to reduce stress. So if our Healthy Living Campus is stressing people out then that's a problem for us." This is exactly what is occurring in this community. And.....this is especially sad when you think about how much the residents of this community have given back to communities everywhere.

Please reconsider every aspect of this project and it's terribly negative impacts on all of us before proceeding further.

Thank you for considering my concerns,

Irene K. Johnson

Catherine Bem

From: Amy Josefek <amy@josefekassoc.com>
Sent: Monday, July 29, 2019 5:00 PM
To: EIR
Subject: Comments re the BCHD Living Campus Master Plan EIR

When for-profit developers come to this area, they are usually very willing to allow the assumption to be that they are creating "affordable housing" (unless they are specifically planning for luxury units). Think the current Legado development on the Palos Verdes Inn property, where the developer actually bussed in El Camino college students, who testified to City Council that they wanted to be able to live in Redondo Beach. Clearly, Legado never mentioned to these kids the likely price tags of roughly \$3,000+monthly per unit.

Affordability is my number one issue for the BCHD plans, too. There are oh-so-many for-profit senior and assisted living residences throughout the South Bay, many of which are actually located in Redondo Beach, just like BCHD. The brand new Kensington facility is just in the process of completion. I believe they will be able to accommodate some 120 residents in 94 units. Lowest prices start around \$7,000.

I've had numerous conversations with BCHD staff over the past couple of months and years, regarding the new Living Campus Master Plan. My biggest issue is the fact that no one has indicated that South Bay residents will be given special rates, in order to allow them (us?) to remain, if not in place, then at least in our own neighborhood.

As we hear more and more discussion about affordable housing, I think that having BCHD pricing be comparable to for-profit corporate housing (Kensington, Sunrise, et al) is truly the wrong way to go. While I understand that income is needed to allow BCHD to continue to offer many excellent programs to the community, there's fair pricing, and then there's gouging. I think the South Bay residents might feel a lot better about this new plan if there knew that they (we) might actually be able to afford this, when/if the time comes.

Like many of my neighbors, I have great concerns about the mass sizing of the concrete walls to the outside, and the sheer mass of the concrete structure that will be visible for so many blocks around it. Does it include 60' high concrete walls that will be even taller, as they sit atop a hill?

It certainly doesn't fit aesthetically with the surrounding neighborhood.

Will it block airflow and light from this neighborhood? Are you going to have fewer parking spots then vs now, with higher client capacity? Developers always like to talk about the fact that fewer people will be driving in coming years, but we see very little to prove that is true NOW and when this project will be completed. Maybe it would be better to construct more spots, with the notion of converting them to other uses later, should traffic/driving habits actually change, as predicted.

And, the number of months/years during which nearby residents will have to undergo exposure to truckloads of dirt being moved, concrete pulverized, noise pollution, and more. Just seems difficult a burden to be living around such a work site for so very many years to come.

There are so many good people who are involved with BCHD. We do hope we can trust you to do the right thing for our community, with money not being the prime motivation in any of your decisions.

Thank you.
Amy Josefek

7/14/1997

Mr. Abbas G Khani
5674 Towers St.
Torrance CA 90503
Work: 331-1432 Home: 371-7434

City Of Torrance City Manager

CC; Mayor Office, Planning Department,

Dear Sir,

AK1-1

My fear for safety of my family is increasing far greater than the increase in number of the uncontrolled vehicles that ram into the curb in front of my house. I am so fearful that every time I back-up from my drive way, I think some vehicle is going to slam to the side of my car. Every time a member of my family parks his or her car across the street from our house, because we can not park on our side of street, they are liable of being hit by an uncontrolled speeding vehicle that goes around the 90 degree blind curb in front of my house. We are disturbed day and night by screech sound of uncontrolled vehicles going around the curve in front of my house.

I have attached copies of five reported accidents for your review. Two of these accidents has caused body injury to the driver or the passenger of the vehicles. In addition, to these five reported accidents, there have been several unreported accidents including two hit and runs. I can not even sell my house because of its potentially dangerous location.

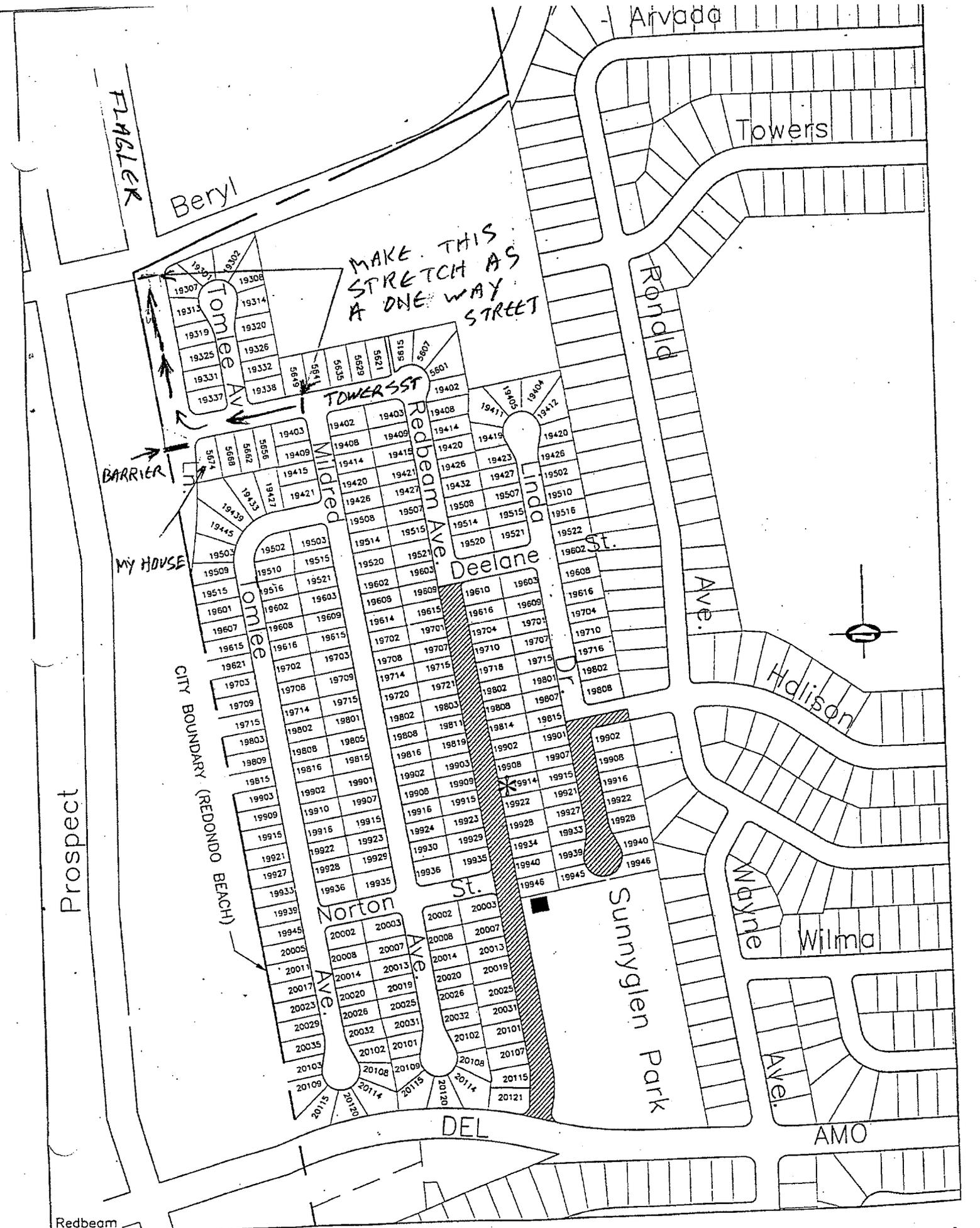
I am writing this letter in despair. I hope that your planning department will take this matter serious and will take care of this serious problem expeditiously.

My request is to close the entrance to Flagler street at cross section Beryl and Flagler to all vehicles. If this is not possible, as minimum, make the section of Towers street and Flagler a one way street north bound between Mildred street and Beryl.

Sincerely Yours,



Abbas G. Khani



Arvada

Towers

FLAGLER

Beryl

MAKE THIS STRETCH AS A ONE WAY STREET

Tomee AV

TOWERS ST

Rondid

BARRIER

MY HOUSE

CITY BOUNDARY (REDONDO BEACH)

omee

Milred

Redbeam

Deelane

INDO

St.

Ave.

Hollison

Prospect

Wayne

Wilma

Norton

St.

Sunnyglen Park

Ave.

AMO

Redbeam

DEL

TORRANCE TRAFFIC COLLISION REPORT

CHP / **ENTERED LB**
JUDICIAL DISTRICT
SO. BAY

SPECIAL CONDITIONS	NUMBER INJURED 0	HIT & RUN FELONY <input type="checkbox"/>	CITY TORRANCE	DR 93-22339
<input type="checkbox"/> NO FOLLOW UP	NUMBER KILLED 0	HIT & RUN MISD. <input checked="" type="checkbox"/>	COUNTY LOS ANGELES	CODE 51.02-05
			PDO <input checked="" type="checkbox"/>	CLASS <input type="checkbox"/> I <input checked="" type="checkbox"/> II <input type="checkbox"/> III

ACCIDENT OCCURRED ON
5674 TOWERS

MO. DAY YEAR: **12/05/93** TIME (2400): **0345**

DAY OF WEEK: **MTWTFSS** TOW AWAY: YES NO

PHOTOGRAPHS BY: _____ OFFICER I.D.: **12512**

YES NO STATE HWY RELATED

LOCATION: **5674 TOWERS** OF **FLAGLER**

FEET/MILES: _____

STATE: **CA** CLASS: **3** SAFETY EQUIP.: _____

VEH. YR.: **88** MAKE/MODEL/COLOR: **FORD, P/u BLUE/WHITE** LICENSE NUMBER: **4F37891** STATE: **CA**

PARTY 1 DRIVER'S LICENSE NUMBER: **C5836067**

DRIVER NAME (FIRST, MIDDLE, LAST): **GARY ALLEN GOLDING JR** OWNER'S NAME: **FISHER, CATHERINE D**

PEDESTRIAN: STREET ADDRESS: **621 BROADWAY** ADDRESS: **2608 1820 PL. REDONDO BCH, CA**

PARKED VEHICLE: CITY/STATE/ZIP: **REDONDO BCH CA 90277** INSURANCE CARRIER: **UNK**

BICYCLIST: RACE: **W** SEX: **M** HAIR: **BRN** EYES: **BRN** HEIGHT: **6-0** WEIGHT: **170** MO. BIRTHDATE DAY YEAR: _____

DISPOSITION OF VEHICLE: ON ORDERS OF: OFFICER DRIVER OTHER

OTHER: HOME PHONE: **(310) 540 1729** BUSINESS PHONE: **(818) 882 4722** **TOWED TO VAN LINGEN**

DIR. OF TRAVEL: **S** ON STREET OR HIGHWAY: **FLAGLER** SPEED LIMIT: **25** PCF: **22350**

ICC PUC CHP

PARTY 2 DRIVER'S LICENSE NUMBER: _____

DRIVER NAME (FIRST, MIDDLE, LAST): _____ OWNER'S NAME: _____

PEDESTRIAN: STREET ADDRESS: _____ ADDRESS: _____

PARKED VEHICLE: CITY/STATE/ZIP: _____ INSURANCE CARRIER: _____

BICYCLIST: RACE: _____ SEX: _____ HAIR: _____ EYES: _____ HEIGHT: _____ WEIGHT: _____ MO. BIRTHDATE DAY YEAR: _____

DISPOSITION OF VEHICLE: ON ORDERS OF: OFFICER DRIVER OTHER

OTHER: HOME PHONE: _____ BUSINESS PHONE: _____

DIR. OF TRAVEL: _____ ON STREET OR HIGHWAY: _____ SPEED LIMIT: _____ PCF: _____

ICC PUC CHP

PARTY 3 DRIVER'S LICENSE NUMBER: _____

DRIVER NAME (FIRST, MIDDLE, LAST): _____ OWNER'S NAME: _____

PEDESTRIAN: STREET ADDRESS: _____ ADDRESS: _____

PARKED VEHICLE: CITY/STATE/ZIP: _____ INSURANCE CARRIER: _____

BICYCLIST: RACE: _____ SEX: _____ HAIR: _____ EYES: _____ HEIGHT: _____ WEIGHT: _____ MO. BIRTHDATE DAY YEAR: _____

DISPOSITION OF VEHICLE: ON ORDERS OF: OFFICER DRIVER OTHER

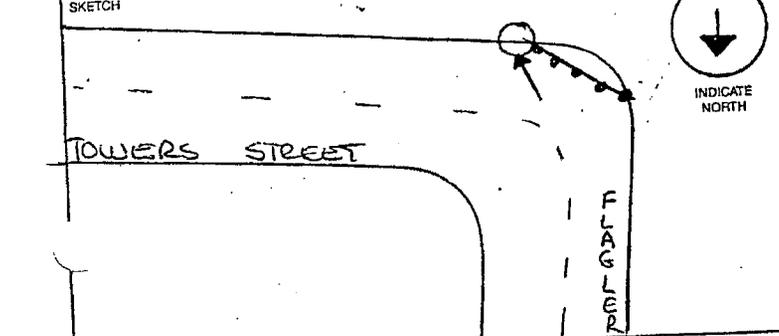
OTHER: HOME PHONE: _____ BUSINESS PHONE: _____

DIR. OF TRAVEL: _____ ON STREET OR HIGHWAY: _____ SPEED LIMIT: _____ PCF: _____

ICC PUC CHP

PROPERTY DAMAGE: OWNER'S NAME/ADDRESS: **CITY OF TORRANCE 3031 TORRANCE BLVD**

DESCRIPTION OF DAMAGE: **GUARD RAIL/FENCE AND 20' TREE**



SUMMARY

VEHICLE #1 DRIVING S/BOUND ON FLAGLER FAILED TO NEGOTIATE EASTBOUND CURVE FROM FLAGLER TO TOWERS STRIKING GUARD RAIL AND TREE AT 5674 TOWER STREET.

REPORTING OFFICER: **GALLEGOS** SERIAL NUMBER: **12512** APPROVED BY: **[Signature]** SERIAL NUMBER: **4735** DATE: **12/7/93**

TORRANCE TRAFFIC COLLISION REPORT

SPECIAL CONDITIONS <input type="checkbox"/> NO FOLLOW UP	NUMBER INJURED 1	HIT & RUN FELONY <input type="checkbox"/>	CITY TORRANCE	JUDICIAL DISTRICT SO. BAY	DR 92 3510
	NUMBER KILLED 0	HIT & RUN MISD. <input type="checkbox"/>	COUNTY LOS ANGELES	PDO <input type="checkbox"/>	CODE 112-111-714

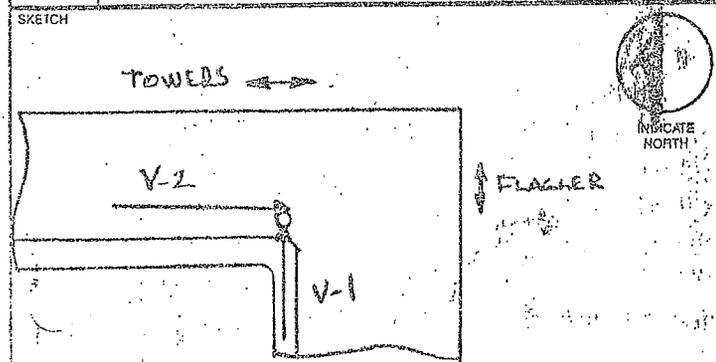
INCIDENT OCCURRED ON TOWERS	MO. DAY YEAR 02 20 92	TIME (2400) 1550	NCIC # 1972	OFFICER I.D. 8848
<input checked="" type="checkbox"/> AT INTERSECTION WITH FLAGLER	DAY OF WEEK S M T W T F S	TOW AWAY <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	PHOTOGRAPHS BY:	STATE HWY RELATED <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

PARTY 1	DRIVER'S LICENSE NUMBER NONE	STATE	CLASS	SAFETY EQUIP.	VEH. YR. MAKE/MODEL/COLOR MOTOCANE BIKE	LICENSE NUMBER N/A	STATE
DRIVER	NAME (FIRST, MIDDLE, LAST) DALE LI				OWNER'S NAME <input checked="" type="checkbox"/> SAME AS DRIVER		
PEDESTRIAN	STREET ADDRESS 510 SUSANA AVE				ADDRESS <input checked="" type="checkbox"/> SAME AS DRIVER		
PARKED VEHICLE	CITY/STATE/ZIP REDONDO BEACH CA 90277				INSURANCE CARRIER FARMERS		
BICYCLIST	RACE A-M	SEX M	HAIR BLK	EYES BRN	HEIGHT 5'8"	WEIGHT 120	BIRTHDATE 2 5 78
OTHER	HOME PHONE (310) 316-2620		BUSINESS PHONE NONE		DISPOSITION OF VEHICLE: ON ORDERS OF: <input type="checkbox"/> OFFICER <input checked="" type="checkbox"/> DRIVER <input type="checkbox"/> OTHER		
	DIR. OF TRAVEL S/B	ON STREET OR HIGHWAY FLAGLER	SPEED LIMIT 25	PCF 21804B	DESCRIBE VEHICLE DAMAGE: <input type="checkbox"/> UNK. <input type="checkbox"/> NONE <input type="checkbox"/> MINOR <input checked="" type="checkbox"/> MOD. <input type="checkbox"/> MAJOR <input type="checkbox"/> TOTAL		

PARTY 2	DRIVER'S LICENSE NUMBER K0031920	STATE CA	CLASS C	SAFETY EQUIP. G	VEH. YR. MAKE/MODEL/COLOR 89 HONDA/402/BIEGE	LICENSE NUMBER 2LH5660	STATE CA
DRIVER	NAME (FIRST, MIDDLE, LAST) MARTHA JUSTINE MADISON				OWNER'S NAME <input checked="" type="checkbox"/> SAME AS DRIVER		
PEDESTRIAN	STREET ADDRESS 320 MARYLAND #3				ADDRESS <input checked="" type="checkbox"/> SAME AS DRIVER		
PARKED VEHICLE	CITY/STATE/ZIP EL SEGUINO 90245				INSURANCE CARRIER FARMERS		
BICYCLIST	RACE W	SEX F	HAIR BRN	EYES BRN	HEIGHT 5'5"	WEIGHT 162	BIRTHDATE 29 11 83
OTHER	HOME PHONE (310) 322-8990		BUSINESS PHONE (310) 798-8646		DISPOSITION OF VEHICLE: ON ORDERS OF: <input type="checkbox"/> OFFICER <input checked="" type="checkbox"/> DRIVER <input type="checkbox"/> OTHER		
	DIR. OF TRAVEL W/B	ON STREET OR HIGHWAY TOWERS	SPEED LIMIT 25	PCF	DESCRIBE VEHICLE DAMAGE: <input type="checkbox"/> UNK. <input checked="" type="checkbox"/> NONE <input type="checkbox"/> MINOR <input type="checkbox"/> MOD. <input type="checkbox"/> MAJOR <input type="checkbox"/> TOTAL		

PARTY 3	DRIVER'S LICENSE NUMBER	STATE	CLASS	SAFETY EQUIP.	VEH. YR. MAKE/MODEL/COLOR	LICENSE NUMBER	STATE
DRIVER	NAME (FIRST, MIDDLE, LAST)				OWNER'S NAME <input type="checkbox"/> SAME AS DRIVER		
PEDESTRIAN	STREET ADDRESS				ADDRESS <input type="checkbox"/> SAME AS DRIVER		
PARKED VEHICLE	CITY/STATE/ZIP				INSURANCE CARRIER FARMERS		
BICYCLIST	RACE	SEX	HAIR	EYES	HEIGHT	WEIGHT	BIRTHDATE
OTHER	HOME PHONE		BUSINESS PHONE		DISPOSITION OF VEHICLE: ON ORDERS OF: <input type="checkbox"/> OFFICER <input type="checkbox"/> DRIVER <input type="checkbox"/> OTHER		
	DIR. OF TRAVEL	ON STREET OR HIGHWAY	SPEED LIMIT	PCF	DESCRIBE VEHICLE DAMAGE: <input type="checkbox"/> UNK. <input type="checkbox"/> NONE <input type="checkbox"/> MINOR <input type="checkbox"/> MOD. <input type="checkbox"/> MAJOR <input type="checkbox"/> TOTAL		

PROPERTY DAMAGE	OWNER'S NAME/ADDRESS	NOTIFIED <input type="checkbox"/> YES <input type="checkbox"/> NO
	DESCRIPTION OF DAMAGE	



SUMMARY
V-1 (BIKE) WAS S/B FLAGLER ON THE EAST SIDEWALK. V-1 LEFT THE SIDEWALK AND CROSSED TOWERS IN FRONT OF V-2 (W/B TOWERS) AND THEY COLLIDED

REPORTING OFFICER F. HESLER	SERIAL NUMBER 8848	APPROVED BY	SERIAL NUMBER	CLEARED BY	SERIAL NUMBER	DATE
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TORRANCE TRAFFIC COLLISION REPORT

JUDICIAL DISTRICT: **SO. BAY** CITY: **TORRANCE** DR: **97 5530**
 SPECIAL CONDITIONS: NO FOLLOW UP NUMBER INJURED: **2** HIT & RUN FELONY: COUNTY: **LOS ANGELES** CODE: **30.02-02**
 NUMBER KILLED: **0** HIT & RUN MISD.: COUNTY: **LOS ANGELES** CLASS: I II III

CHP

Emt 4-PR

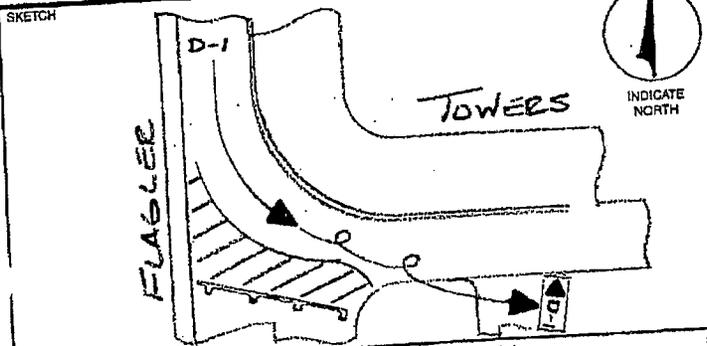
ACCIDENT OCCURRED ON: **TOWERS** MO. DAY YEAR: **3 30 97** TIME (2400): **1840** NGIC #: **1972** OFFICER I.D.: **14030**
 AT INTERSECTION WITH: OR: **20** FEET/MILES **EW** OF **FLAGLER** DAY OF WEEK: **(S) M T W T F S** TOW AWAY: YES NO PHOTOGRAPHS BY: **NONE** STATE HWY RELATED: YES NO

PARTY 1 DRIVER'S LICENSE NUMBER: **DL0673872** STATE: **CA** CLASS: **C** SAFETY EQUIP.: **C** VEH. YR.: **86** MAKE/MODEL/COLOR: **SUZUKI/SAMURAI/GRN** LICENSE NUMBER: **7R1F410** STATE: **CA**
 DRIVER NAME (FIRST, MIDDLE, LAST): **DONALD RAYE HAMMOND** OWNER'S NAME: SAME AS DRIVER
 STREET ADDRESS: **1823 MARSHALLFIELD LN** ADDRESS: SAME AS DRIVER
 CITY/STATE/ZIP: **P.B. CA 90278** INSURANCE CARRIER: **STATE FARM #7043310575** POLICY NUMBER: **7043310575**
 RACE: **W** SEX: **M** HAIR: **BRN** EYES: **BRN** HEIGHT: **5'01"** WEIGHT: **135** MO. BIRTHDATE DAY YEAR: **6 11 74** DISPOSITION OF VEHICLE: ON ORDERS OF: OFFICER DRIVER OTHER
 HOME PHONE: **(310) 372-0646** BUSINESS PHONE: **()** DESCRIBE VEHICLE DAMAGE: UNK. NONE MINOR MOD. MAJOR TOTAL SHADE IN DAMAGED AREA:

PARTY 2 DRIVER'S LICENSE NUMBER: **25 22350** STATE: **CA** CLASS: **C** SAFETY EQUIP.: **C** VEH. YR.: **86** MAKE/MODEL/COLOR: **VAN LINGEN TOW** LICENSE NUMBER: **()** STATE: **()**
 DRIVER NAME (FIRST, MIDDLE, LAST): **TOWERS** OWNER'S NAME: SAME AS DRIVER
 STREET ADDRESS: **()** ADDRESS: SAME AS DRIVER
 CITY/STATE/ZIP: **()** INSURANCE CARRIER: **()** POLICY NUMBER: **()**
 RACE: **()** SEX: **()** HAIR: **()** EYES: **()** HEIGHT: **()** WEIGHT: **()** MO. BIRTHDATE DAY YEAR: **()** DISPOSITION OF VEHICLE: ON ORDERS OF: OFFICER DRIVER OTHER
 HOME PHONE: **()** BUSINESS PHONE: **()** DESCRIBE VEHICLE DAMAGE: UNK. NONE MINOR MOD. MAJOR TOTAL SHADE IN DAMAGED AREA:

PARTY 3 DRIVER'S LICENSE NUMBER: **()** STATE: **()** CLASS: **()** SAFETY EQUIP.: **()** VEH. YR.: **()** MAKE/MODEL/COLOR: **()** LICENSE NUMBER: **()** STATE: **()**
 DRIVER NAME (FIRST, MIDDLE, LAST): **()** OWNER'S NAME: SAME AS DRIVER
 STREET ADDRESS: **()** ADDRESS: SAME AS DRIVER
 CITY/STATE/ZIP: **()** INSURANCE CARRIER: **()** POLICY NUMBER: **()**
 RACE: **()** SEX: **()** HAIR: **()** EYES: **()** HEIGHT: **()** WEIGHT: **()** MO. BIRTHDATE DAY YEAR: **()** DISPOSITION OF VEHICLE: ON ORDERS OF: OFFICER DRIVER OTHER
 HOME PHONE: **()** BUSINESS PHONE: **()** DESCRIBE VEHICLE DAMAGE: UNK. NONE MINOR MOD. MAJOR TOTAL SHADE IN DAMAGED AREA:

PROPERTY DAMAGE: OWNER'S NAME/ADDRESS: **()** DESCRIPTION OF DAMAGE: **()**



SUMMARY
D-1 A/B FLAGLER MAKES A LEFT TURN FOR W/B TOWERS, WHICH CAUSES THE CAR TO ROLL OVER. VIOLATION OF 22350 (CYCLUNSAFE SPEED FOR CONDITIONS). A01 26'E. OF THE E/C/L OF FLAGLER

REPORTING OFFICER: **SABBY** SERIAL NUMBER: **14030** APPROVED BY: **AGST IRVINE** SERIAL NUMBER: **12262** CLEAR BY: **(Signature)** SERIAL NUMBER: **4135** DATE: **3/31/97**

WRITTEN COMMENT FORM
BEACH CITIES HEALTH DISTRICT
HEALTHY LIVING CAMPUS MASTER PLAN EIR

If you would prefer to submit written comments, please complete this written comment form. Continue on the back of the form or attach extra pages, as necessary.

In order to be addressed in the Draft Environmental Impact Report (EIR), written comments must be received by the close of the public comment period at 5:00 PM on July 29, 2019.

NAME: ABOBS G KHANI

TITLE/ORGANIZATION: OWNER

ADDRESS: 5674 TOWERS ST TARRANT 90503
(Street) (City/State/Zip)

—COMMENTS—

1) I HAVE RESIDED FOR 28 YEARS IN MY HOUSE
ON THE CORNER OF FLAGLAR AND TOWERS.
I HAVE WITNESSED MANY ACCIDENTS WITH DOCUMENTED
POLICE REPORT ON THAT CORNER. CARS SPEED
UP AND IT IS A VERY UNSAFE/DANGEROUS WITH
THE CURRENT TRAFFIC. ~~THE~~ I WILL PROVIDE
POLICE REPORTS AND PICTURES IF REQUIRED.
THIS NEW DEVELOPMENT SHOULD NOT ADD ANY
EXTRA FLOW OF TRAFFIC INTO FLAGLAR &

AK2-1

Please hand this completed form to Wood staff at the sign-in table or mail to:

Mr. Nick Meisinger, Environmental Planner
Wood Environment & Infrastructure Solutions, Inc.
9210 Sky Park Court, Suite 200
San Diego, CA 92123

Written comments may also be e-mailed to:
EIR@bchd.org

—COMMENTS CONTINUED—

CONSEQUENTLY, TOWERS ST.

AK2-2
2) THIS DEVELOPMENT IS GOING TO LAST FOR 15 YEARS. I LIKE TO KNOW WHAT IMPACT THE DIRT, THE DUST, AND THE CONSTRUCTION CREW'S NOISE IS GOING TO HAVE ON THE IMMEDIATE RESIDENTS. IS BEACH CITY PROVIDE TEMPORARY HOUSING FOR THE IMMEDIATE RESIDENTS INCLUDING MY FAMILY?

3) I AM ABSOLUTELY AGAINST THIS PROJECT. I AM 75 YEARS OLD AND WILL NOT ALLOW THE REMAINDER OF MY LIFE TO BE TAKEN AWAY BY THIS PROJECT.

4) I DON'T KNOW WHAT ARE MY OPTIONS. HOWEVER, I AM WILLING TO SELL MY HOUSE TO THE BEACH CITY FOR THE FAIR MARKET PRICE, AS OF TODAY.

5) SHALL THIS PROJECT BE FORCED UPON THE COMMUNITY, THERE SHALL BE NO ENTRANCE OR EXIT TO THE FACILITY ON FLAGLER AND ITS CONTINUATION ALLY WAY.

ARABEL G. KHANI

Martinez, Oscar

From: Poirier, Rebecca
Sent: Monday, July 29, 2019 9:09 AM
To: Martinez, Oscar
Subject: FW: BCHD Healthy Living Campus Master plan EIR
Attachments: Accident Photo.pdf; Police Reports.pdf

-----Original Message-----

From: Abbes Khani [mailto:abbkh3@aol.com]
Sent: Saturday, July 27, 2019 4:16 PM
To: eir@bchd.org; michelle.bholat@bchd.org
Cc: Furey, Pat <PFurey@TorranceCA.gov>; Chen, George <GChen@TorranceCA.gov>; Griffiths, Mike <MGriffiths@TorranceCA.gov>; Herring, Milton <MHerring@TorranceCA.gov>; Mattucci, Aurelio <AMattucci@TorranceCA.gov>; Rizzo, Geoffrey <GRizzo@TorranceCA.gov>; Poirier, Rebecca <RPoirier@TorranceCA.gov>; Cortez, Dana <dcortez@TorranceCA.gov>; bill.brand@redondo.org; Nils.Nehrenheim@redondo.org; todd.loewenstein@redondo.org; christian.horvath@redondo.org; john.gran@redondo.org; laura.emdee@redondo.org; noel.chun@bchd.org; jane.diel@bchd.org; vanessa.poster@bchd.org; vish.chatterji@bchd.org
Subject: BCHD Healthy Living Campus Master plan EIR

WARNING: External e-mail
Please verify sender before opening attachments or clicking on links.

To Mr. Nick Meisinger & Ms. Michelle Bholat,

My name is Abbes Khani, I am a resident of the city of Torrance residing at 5674 Towers Street since 1989. My house is on the junction of Towers and continuation of Flagler Alley way. The Beach Cities Health District proposed project site is over the hill to my immediate west. Currently, the BCHD site has no entry, no exit and no pedestrian and vehicular interface with Flagler street. The empty plot of land on the corner of Flagler and Beryl also has no interface, no entry and no exit to Flagler. To my knowledge the portion of Flagler street between Towers and Beryl is in the city of Torrance and is a gateway to access single family homes located east of the BCHD site.

On the onset I am emphasizing that the BCHD site and its empty plot have no interface with Flagler street which is under jurisdiction of the city of Torrance and it SHALL REMAIN THAT WAY.

AK3-1 Among all the residential houses in the city of Torrance to be affected by the BCHD project, my house is the closest one and thus will be the most impacted. Because it is located directly next to and east of the construction site it will be subject to sound, vibration, and air pollutants. The effects and intensity of the sound and air pollutants will be compounded due to the ocean breeze which blows west to east.

BCHD and the city of Redondo Beach elected officials have no jurisdiction over me and my family and have no statutory authority to negatively impact our lives in any shape or manner. My sincere suggestion is that this project be filed and all activities cease all together and immediately. However, I know my family has no saying in this. Therefore, I am going to document the actions that I request to be addressed in the environmental study phase.

I am demanding that the Wood company specify the following in their EIR:

- AK3-2 1. What is the acceptable seismic vibration level going to be at my house during each phase of demolition and construction?
- AK3-3 2. What is the acceptable sound level going to be at my house in decibels and for what duration in each phase of the project?
- AK3-4 3. What is the acceptable size, intensity and chemical makeup of air pollutants that are going to be in and around my home and for what duration of time in each phase of this project?
- AK3-5 4. For questions 1 to 3, the report shall specify at what level and what duration it becomes a cause for short term and long term chronic sickness for my family members as young as two years old and as old as age 75?
- AK3-6 5. The report shall specify how these limits are going to be measured, monitored and recorded at and around my home during each phase of the project.
- AK3-7 6. The report shall specify what the construction contractor's obligation is to comply with and meet these limits?
- AK3-8 7. The report shall specify upon breach of above set limits who has the responsibility and authority to investigate and mitigate the issues.
- 8. The report shall set forth the monetary penalties for first time, second time and third time violations.
- 9. The report shall specify that upon the third violation, the activities shall be stopped until the cause of the issue is investigated and rectified permanently.
- 10. The report shall specify that the lead construction contractor shall install within 10 yards of my home, tamper proof sensors, detectors and pollutant/dust collection devices to measure and record the value, time and duration of the limits set forth above.
- AK3-9 11. The report shall specify that when the limits set above are breached, the monitoring system shall automatically alert the project manager as well as my house and family members via Internet.
- 12. The report shall specify that the collected pollutant/dust samples shall be periodically retrieved and sent to a certified and independent lab for analysis to determine the chemical contents. Upon detection of harmful substances, the results of the lab findings shall be shared with my family and our family Physicians via Internet.
- 13. Shall the requirements set forth in the above be breached and become reoccurring, the city of Redondo Beach municipality shall buy out my house immediately without bringing on a slew of lawyers and professionals upon me. My current house value is \$1,275,000.00. The take over / purchase value shall be upgraded for a 5% rate for cost of living increase per year. For example if this occurs in 3 years in July of 2022, my house should be purchased by the city of Redondo Beach for \$1,476,000.00.

AK3-10 With regard to traffic, I am attaching 5 police recorded accident reports that have occurred in front of my house. I am also attaching a picture of the Police recording an accident between a juvenile bicyclist and a car in front of my house, right at the very spot that is going to be the route of the proposed bike path.

As stated at the onset, the BCHD site and vacant lot have no interface with Flagler street and it shall remain that way. There shall be no vehicular and no pedestrian entry/exit way for the campus on Flagler street without the city of Torrance's approval. The City of Torrance shall grant its approval upon completion of its own thorough traffic study simulating the additional traffic that results from this massive project.

In conclusion, I understand that in the United States of America a person is entitled to his or her rights. In reality he or she has no rights unless he or she stands for them and I intend to stand for my rights in every step of the way with regard to this project. For example, it is my right to live in my house without any disturbance. It is my right to live a peaceful life. If this is violated, I intend to fight for this right.

Since my family did not vote for the Redondo Beach and BCHD elected officials, they have no right to infringe or impose any disturbances, disruptions, health hazards or stressful issues upon us except under provision of eminent domain laws. Otherwise they would be violating my right to a peaceful living.

With Great Concern,
Abbes G Khani

Ramos, Ryan

From: EIR <eir@bchd.org>
Sent: Friday, August 2, 2019 1:52 PM
To: Meisinger, Nick
Subject: Fw: BCHD scoping meeting

From: Sang Kim <sangarama@yahoo.com>
Sent: Monday, July 29, 2019 2:35 PM
To: EIR <eir@bchd.org>
Subject: BCHD scoping meeting

Hello Nick,

I attended the scoping meeting at West Torrance High School on Thursday 7/18/19. I am submitting comments as follows:

SK-1 (1) Towers Elementary (where both my children will be attending in the upcoming years) and Beryl Heights Elementary are within a very short distance from the construction site. Both offshore and onshore winds will carry dust and exhaust from the construction site to both schools. This is a scary and unacceptable situation that I'm not sure how can be mitigated.

SK-2 (2) If construction starts, when approaching Flagler from the east, or leaving Flagler towards the east, construction vehicles must not use Beryl Street, which borders Towers Elementary. Instead, they should use eastbound & westbound 190th St to Flagler, or Flagler to 190th St.

SK-3 (3) I'll mention what's been talked about a lot. The traffic on Redbeam and Mildred residential streets will turn into a highway. I'm already extremely cautious about walking with my kids from my home on Mildred Ave to Sunnyglen Park. I watch drivers roll through stop signs on Redbeam. And on a daily basis, drivers speed southbound on Mildred in an effort to cut through to Del Amo. Those southbound drivers often miss the intersection on Norton and speed through to the end of the cul de sac. This is definitely a cul de sac that gets speeding drivers both entering and exiting the cul de sac when they realize they missed their left turn on Norton towards Redbeam. We are already doing what we can to deal with the traffic. Additional traffic will undoubtedly make the neighborhood an unsafe area for families.

Sang Kim
Resident of Pacific South Bay, near Sunnyglen Park
sangarama@yahoo.com
310-257-1197

From: EIR <eir@bchd.org>
Sent: Thursday, July 25, 2019 10:40 PM
To: Meisinger, Nick
Subject: Fw: Beach Cities Health Project Comments

From: jmlake7@aol.com <jmlake7@aol.com>
Sent: Thursday, July 25, 2019 12:08 PM
To: EIR <eir@bchd.org>
Subject: Beach Cities Health Project Comments

I'm writing this e-mail in response to a recent notification regarding a giant new health and mixed services complex near the corner of Beryl and Flagler Streets in Torrance, Ca.

I have many concerns but I'll only address my top three: significantly increased neighborhood traffic, inappropriate aesthetics and pollution.

Traffic

I've been a resident of the Torrance neighborhood just east and south of the proposed development for the last 35 years, Unfortunately, my house is very near the corner on one of the most used traffic short cuts through our neighborhood. Drivers have used these shortcuts from Beryl (quite busy already) to major streets such as Del Amo and Anza to our south and east. The situation now is a steady stream of mostly speeding vehicles that ignore all the stop signs and roar around the corner without regard for any pedestrians, especially children going to a nearby school and/or park or any of us backing out of our driveways. There have been many accidents over the years including the death of one child about a half-mile into one of these shortcuts.

The proposed development includes a multi-unit assisted care facility, health club and other businesses that will significantly increase this shortcut traffic and further degrade our neighborhood. The health club will have people coming and going frequently in addition to many employees, doctors and emergency vehicles serving the assisted living/medical facilities. All of this is made worse by apparently the only access to planned underground parking being located on Flagler about 50 yards from the entry to our neighborhood. Flagler St. in this area is totally within the bounds of Torrance and all of us in the neighborhood will push hard for the city to close the street if the project continues as planned. The facility traffic should enter and exit via Prospect Avenue (major street) on the west side of the development. Then it would primarily affect Redondo Beach whose residents will supposedly benefit from its presence.

Aesthetics

My first thought when I saw the artist rendering of this development is that it looks like the headquarters of some Fortune 500 company or maybe something out of a Star Wars amusement park. It just totally overwhelms everything in that part of Torrance and Redondo Beach! Many of the proposed assisted care units will look directly down into the backyards of many residents. The overall height must be near 100 feet and it would be built on a hill to boot. It would simply destroy the quality of life for those residents nearest the facility.

Pollution

The project is stated to take 15 years to complete. During that time we will have all the construction vehicles and their associated pollution traversing our neighborhood and nearby streets. The construction dust and vehicular pollution will drift directly onto an elementary school not more than a couple of hundred yards away. There is a middle school about a mile away. As mentioned above, this construction traffic will further jeopardize the safety of our residents and especially the children walking to these nearby schools. This activity will also inevitably involve

  considerable noise pollution from all the trucks and other construction vehicles.

Summary

 I realize it is unreasonable to reject all development of this land parcel, It is equally unreasonable for the residents of our neighborhood and those nearby to experience the degraded quality of life threatened by such a massive development. I can only hope the scope of this monolith can be reduced. All of us involved in resisting this totally unsuitable development will be doing everything we can to stop it. Hopefully the leaders of Torrance will help us, even if it means closing off access to our neighborhood from that area.

Jerry Lake

From: EIR <eir@bchd.org>
Sent: Thursday, July 25, 2019 10:22 PM
To: Meisinger, Nick
Subject: Fw: Construction adjacent to our home

From: Paul Lieberman <lieberman.lra@gmail.com>
Sent: Tuesday, July 23, 2019 3:22 PM
To: EIR <eir@bchd.org>
Subject: Construction adjacent to our home

Gentlemen,

During the last construction period at that same site we had the following undesired negative effects:

- ☐☐-1 *Dust covered windows
- ☐☐-1 *Dust covered furniture in the house in spite of closed windows
- ☐☐-1 * We have asthma breathing problems
- ☐☐☐ *Rats fled from their homes under work site to our home
- ☐☐☐ *Noise started early in the morning and continued all day
- ☐☐☐ * Road closings
- ☐☐☐ * Reduced house value. Our house and garden are now valued at more than \$1, 400, 000. We plan to sell the house in the next 7 years. We expect that our house value will be lower by \$100,000 by having long term construction zone nearby.
- ☐☐☐ * Increased traffic to new buildings. It currently takes more than 15 minutes to get to 405 freeway on 190 th street.

We vote NO on this long term construction site.

Paul and Ilse Lieberman
19815 Mildred Avenue
Torrance, CA 90503-1121
310 371 2198
LIEBERMAN.LRA@GMAIL.COM

Ramos, Ryan

From: EIR <eir@bchd.org>
Sent: Friday, August 2, 2019 1:37 PM
To: Meisinger, Nick
Subject: Fw: BCHD EIR
Attachments: SB Hospitl from Mildred Ave.JPG

From: Lisa Limm <lclimm@yahoo.com>
Sent: Monday, July 29, 2019 9:17 AM
To: EIR <eir@bchd.org>
Cc: OMartinez@torranceca.gov <OMartinez@torranceca.gov>
Subject: BCHD EIR

Dear Mr. Meisinger,

Thank you for time during the scoping meeting at West High School. I live in Torrance on Mildred Avenue immediately east of BCHD's proposed Healthy Living Campus. I know you have received numerous remarks from my neighbors, so I will try not to repeat the most obvious concerns. Below are my comments regarding the impacts of the project.

- LL-1 • Length of the project: For the children in the neighborhood, the construction will outlast their childhood. For the retired members of the community, the construction may well outlast their lifespan.
- LL-2 • Size of the project: Attached is a view from my home of the current hospital. The size and location of the building does not overpower the neighborhood. However, in its proposed configuration, the BCHD facilities would dwarf our homes.
- LL-3 • Pollution: The playground of Towers Elementary School is less than 100 yards from the BCHD site. How will the dust, construction vehicle fumes and other airborne pollution be minimized to protect the children?
- LL-4 • Pedestrian safety during construction: I walk frequently from my home to the shopping center adjacent to the BCHD property. When the sidewalk along the corner of Flagler Lane and Beryl Street (the empty lot for the proposed child development center) was upgraded recently, I was forced to walk in the street to reach the grocery store. What will BCHD do to keep pedestrians safe from physical obstructions, construction vehicles and detoured commuter traffic?
- LL-5 • Pedestrian safety after completion: The proposed parking structure entrance on Flagler Lane likely will create more pass-through traffic on Redbeam Avenue and Mildred Avenue for vehicles going to/from Del Amo Boulevard. There has already been an increase in speeding cars in our neighborhood (regardless of added stop signs) with the advent of apps such as Waze. These vehicles drive past a park and the entrance to an elementary school. What will BCHD or the city of Torrance do to mitigate the additional traffic?

Thank you for your time.
Best regards,
Lisa Limm

Ramos, Ryan

From: EIR <eir@bchd.org>
Sent: Friday, August 2, 2019 1:38 PM
To: Meisinger, Nick
Subject: Fw: Proposed Beach Cities Health District Project

From: ARNOLD MAIER <arnoldflora@msn.com>
Sent: Monday, July 29, 2019 9:54 AM
To: EIR <eir@bchd.org>
Subject: Proposed Beach Cities Health District Project

Arnold and Flora Maier
19702 Tomlee Ave
Torrance, CA 90503

July 28 2019

I would like to let you know about my public concerns regarding the proposed Beach Cities Health District Project.

Since we live close to the construction area, we will be exposed to a considerable amount of noise, dust, exhaust fumes etc.

AM-1 This will affect our health and well being in our home

Towers Elementary school which has the playground close to the construction site will also be affected for the next 15 years.

With construction going on close to our neighborhood for approx. 15 years, this is no longer a pleasant and healthy area to live. Our houses will loose considerable amount of value

AM-2 The subterranean exit into Flagler Lane will be creating excessive amount of traffic into our residential neighborhood and also for the school children from Towers Elementary school.

This project is simply too large and too close to our residential neighborhood.

Respectfully
Arnold and Flora Maier

Ramos, Ryan

From: EIR <eir@bchd.org>
Sent: Thursday, July 25, 2019 10:33 PM
To: Meisinger, Nick
Subject: Fw: Beach Cities Health District project

From: BMATSUI@socal.rr.com <BMATSUI@socal.rr.com>
Sent: Wednesday, July 24, 2019 11:23 AM
To: EIR <eir@bchd.org>
Subject: Beach Cities Health District project

Mr. Meisinger,

I am writing in opposition to the proposed construction of the facility on the corner of Flagler and Beryl in the city of Redondo Beach. I am a home owner in the housing tract just southeast in the city of Torrance. So this project will literally be in my backyard. I have owned my property since 2002. And one of the main reasons my husband and I bought our home was because of the neighborhood. It's beautiful, peaceful, quiet, and a place where we have raised our children.

BM-1 The construction will draw many negative elements to our neighborhood. It will drive down home values. It
BM-2 will decrease our quality of living with the dust and noise pollution. It will increase traffic congestion to an
M- already busy location with the school nearby. Any construction project causes an inconvenience, but the
proposed 15 years is exorbitant.

Thank you in advance for considering my comments.

Sincerely,
Brenda Matsui

WRITTEN COMMENT FORM
BEACH CITIES HEALTH DISTRICT
HEALTHY LIVING CAMPUS MASTER PLAN EIR

If you would prefer to submit written comments, please complete this written comment form. Continue on the back of the form or attach extra pages, as necessary.

In order to be addressed in the Draft Environmental Impact Report (EIR), written comments must be received by the close of the public comment period at 5:00 PM on July 29, 2019.

NAME: Suzanne McCune

TITLE/ORGANIZATION: resident

ADDRESS: 1224 S. Bertuda Ave RB 90277
(Street) (City/State/Zip)

—COMMENTS—

Please don't build 420 units of senior housing or ~~assisted~~ ~~assisted~~ living units. The infrastructure can't handle more housing density. Thank you

SM-1

Please hand this completed form to Wood staff at the sign-in table or mail to:

Mr. Nick Meisinger, Environmental Planner
Wood Environment & Infrastructure Solutions, Inc.
9210 Sky Park Court, Suite 200
San Diego, CA 92123

Written comments may also be e-mailed to:
EIR@bchd.org

Ramos, Ryan

From: EIR <eir@bchd.org>
Sent: Friday, August 2, 2019 1:51 PM
To: Meisinger, Nick
Subject: Fw: BCHD concerns for Torrance

From: Jan McDonald <jantana11@hotmail.com>
Sent: Monday, July 29, 2019 2:05 PM
To: EIR <eir@bchd.org>
Subject: BCHD concerns for Torrance

Nick Meisinger,
Here is a list of my concerns for our neighborhood..

15 years of noise. That is so excessive.

Our air quality for 15 years.

We have a pool with the ocean breeze we will have crap in our pool. That will affect our pool filter which will eventually ruin our pump.

My father is 85 years old. He is on dialysis 3xs a week. It lowers his immune system. We have to open up our windows because we don't have air conditioning. All the junk in the air will affect him.

We live on Towers St our backyard backs up to Towers Elementary. I'm concerned about the kids having to deal with noise, air quality and all that goes with this 15 year construction.

The run off of stuff will come down our street. I know this because when the sewer backs up around Vons our street gets the milk and other junk flowing down our street.

All of the animals that live in the trees and bushes will come into our Torrance neighborhood not Redondo.

They will go into Towers school. There already is enough critters on the school grounds. I'm especially concerned about rats we already have enough around the school.

Traffic and parking on our street is already a problem. Especially when school is in session. Kids are running across the street. Drivers are blowing thru the stop sign.

Our house was the second house to be completed 50 years ago. That is when we moved in. We are still here. I moved back into the house 5 years ago to help my father.. Since we lived here our car, wall and tree have been hit. Just this past years there have been 5 car accidents right on the Towers/Redbeem curve. Our street is already unsafe. I don't want to deal with 15 years of out of control traffic.

Thank you,
Jan McDonald
5629 Towers St
Torrance, Ca. 90503

Ramos, Ryan

From: EIR <eir@bchd.org>
Sent: Friday, August 2, 2019 1:31 PM
To: Meisinger, Nick
Subject: Fw: BCHD Healthy Living Campus Master Plan - TJM Comments

From: Lynne Meehan <ltkatmee@gmail.com>
Sent: Saturday, July 27, 2019 5:16 PM
To: EIR <eir@bchd.org>
Cc: OMartinez@torranceca.gov <OMartinez@torranceca.gov>
Subject: BCHD Healthy Living Campus Master Plan - TJM Comments

Mr. Nick Meisinger,

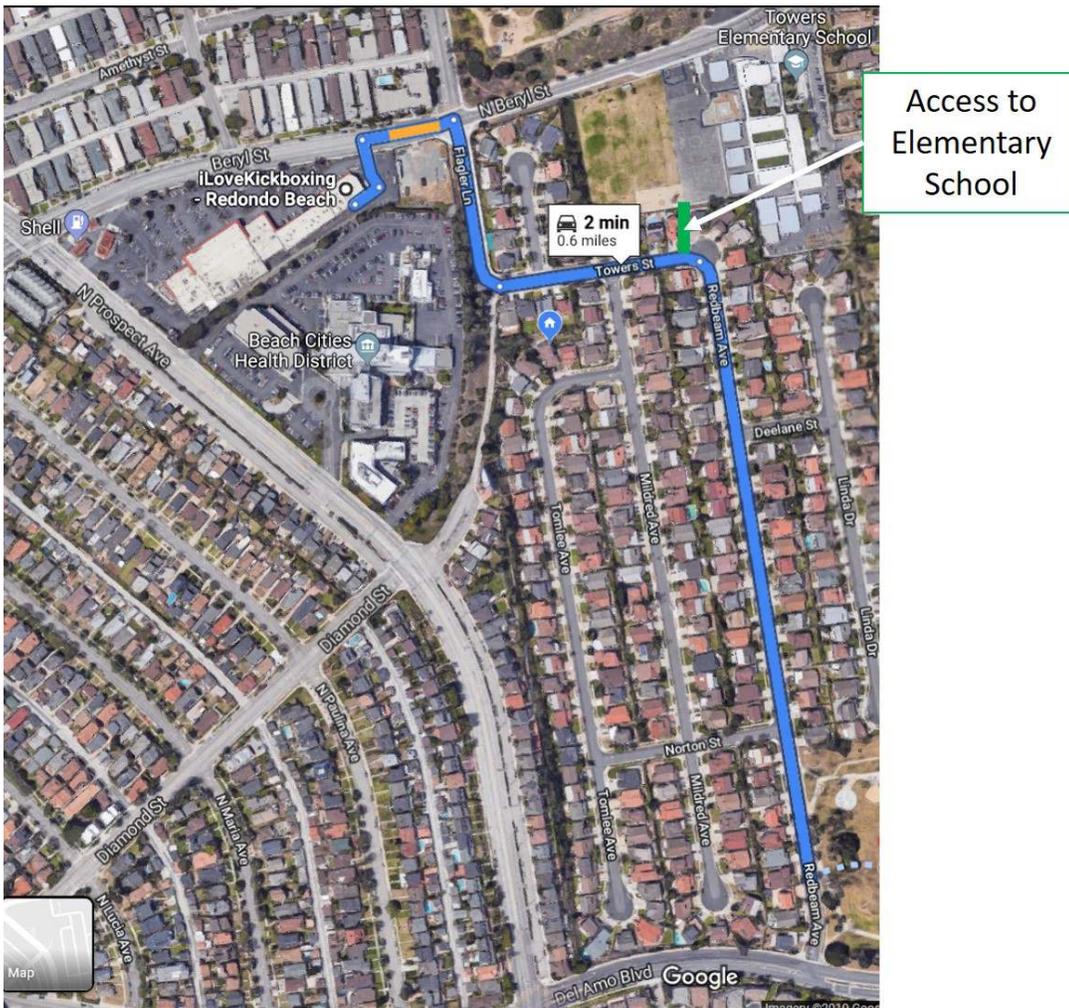
I have the following comment to the NOP.

Concern for impact to:

VXII. TRANSPORTATION

c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

TM-1 Introduction of ingress/egress to BCHD on Flagler and Beryl poses significant risk to population living/attending elementary school in residential neighborhood to the east of project (picture attached).



Suggestion to mitigate impact to population in residential neighborhood east of the project:

Suggest that all ingress/egress for parking should be from Prospect.

TM-2 Logic: Prospect is a main road. Can easily have multiple ingress/egress locations on Prospect (one at either end of complex). If only ingress/egress is on Prospect, fewer people will cut through residential neighborhood on east side because it would take longer to get to parking.

TM-3 Additionally, I would also suggest no personnel ingress from Flagler and Beryl (even for dropoff). This would also be necessary to reduce street traffic through the neighborhood. Similar logic as above. Limiting access to the facility ingress to Prospect would reduce the temptation to drive through or park in residential neighborhood to the east of the project. (understand if need to maintain egress for safety purposes).

TM-4 Construction of such a large campus near a residential area is out of character for the area (see picture) and will have significant impact to nearby residents, both during and after construction. There is really no comparison between the nearby residential VONs shopping center and the proposed Health complex. For this local area, projects of this magnitude are typically found in areas like the along Artesia, Hawthorne, Manhattan Beach Blvd, or waterfront (where more people have quick access).

Regards,

Tim Meehan
19427 Tomlee Ave, Torrance CA

Ramos, Ryan

From: EIR <eir@bchd.org>
Sent: Friday, August 2, 2019 1:55 PM
To: Meisinger, Nick
Subject: Fw: Public Comments on Proposed BCHD Project

From: Kathy Merkovsky <kmerkovsky@hotmail.com>
Sent: Monday, July 29, 2019 4:53 PM
To: EIR <eir@bchd.org>
Cc: OMartinez@torranceca.gov <OMartinez@torranceca.gov>
Subject: Public Comments on Proposed BCHD Project

Dear Mr. Nick Meisinger,

As a resident of the West Torrance neighborhood that will be impacted by the BCHD Project, I submit to you my concerns and comments.

- KM-1 • The project will increase noise and air pollution in our Torrance neighborhood as well as increase safety risks for those who live, walk and drive through our neighborhood. The study should include an analysis of these potential risks.
- KM-2 • As you may be aware, Towers Elementary has significant vehicle and pedestrian traffic during drop off and pick up times. Please ensure that your study tracks this traffic during the school year during those times.
- KM-3 • As a resident on Redbeam Avenue, my husband and I park our vehicles in our driveway with the vehicles' front ends facing the street due to the amount of traffic on our street. Backing a vehicle out of the driveway can be dangerous due to clueless drivers speeding around the corner going south on Towers which turns right on Redbeam. Another reason we park this way is so that we can easily maneuver our vehicles onto the street during drop off/pick up times at Towers Elementary when traffic is the heaviest. Your study should include the current residential parking situation in our neighborhood as well as the traffic at peak times.
- KM-4 • Parking for BCHD employees, construction workers, patients, residents and visitors will spill over into the Torrance neighborhood just east of the site. Unfortunately, parking is already tight in the area and becomes extremely difficult during Towers Elementary's drop off/pick up hours. BCHD employees, construction workers, patients, residents and visitors should park only on the BCHD site. Please ensure that the site can accommodate all these vehicles versus parking in our neighborhood.
- KM-5 • Drop off/pick up for BCHD's daycare parents will be using Flagler. The timing of this coincides with the drop off/pick up of students from Towers Elementary on Towers Street and Beryl Street, both of which intersect with Flagler. BCHD's daycare facility should be moved to the west side of the site so that those parents can use Prospect Avenue as their thoroughfare for drop off/pick up of their children so that it does not conflict with the drop off/pick up at Towers Elementary. Your analysis of the childcare drop off/pick up timings at the proposed location and another location, preferably Prospect Avenue, would be appreciated.
- KM-6 • Transportation of hazmat from the site should be studied. Use of Prospect and 190th would be the most ideal as those roads already handle heavy traffic. My concern is that hazmat vehicles will be transporting hazmat through our neighborhood and/or using Beryl Street. I can foresee a hazmat vehicle travelling south on Flagler, turning east on Towers, then turning south on Redbeam to access Del Amo Blvd. With the increase of hazmat transportation through this route, this would also increase the likelihood of an incident that could include a

hazmat spill in our neighborhood. Also, it is my understanding that our neighborhood streets were not designed for heavy transport traffic. Alternatively, if Beryl is used for the hazmat transports, this places the transporting vehicles in close proximity to Towers Elementary. Again, this would increase the likelihood of a hazmat spill close to the school and its students. Your study should include the best route for heavy vehicles and those transporting hazmat with the least amount of risk to the Torrance community, which includes the residents and the local students.

KM-7

- Since this is a Redondo Beach project, Redondo Beach roadways should be utilized instead of increasing the wear and tear of Torrance streets. Perhaps the currently closed portion of Flagler could be opened to allow one-way traffic south to Diamond, which would enable the traffic to empty onto Prospect. Redondo Beach owns the majority of Flagler and would have to work with Torrance on the portion they own to make this work. Your analysis of this option would be appreciated.

KM-8

- Consideration should be given to the closing of Towers Street at Flagler to prevent BCHD traffic from turning east onto Towers Street. This would eliminate the potential traffic burden to the West Torrance neighborhood and route the traffic through Redondo Beach through the use of Flagler, as mention in my previous point. Please determine if this is a viable option.

KM-9

- I'm not sure that you are aware, but Towers Elementary has a before school/after school care program for children that is run by the YMCA on Towers' campus. They utilize the portable classroom at the southern end of the campus, nearest to the homes at the end of the Linda Drive cul-de-sac. The children who participate in the YMCA's before/after school program at Towers Elementary will also be impacted by the noise and air pollution as well as traffic that will come with the BCHD project. Please include the before/after school program in your study.

KM-10

- The kids who have team practices at Entradero Park, particularly the softball and baseball teams, will be downwind of the BCHD project. Please include Entradero Park and the people that utilize this park in your studies.
- The adults who routinely walk around Sunnyglen Park utilizing its pathway and exercise equipment will be impacted as well as the families that visit and use the playground equipment and have soccer, baseball, and softball practices. Your study should include the folks that use Sunnyglen Park.

- Construction sites typically use water for dust control. There could also be stormwater runoff from the site. Any water runoff from the site will go downhill onto Beryl Street and also Towers Street from Flagler. Beryl Street has always flooded easily. During rainy weather, cautionary yellow flooding signs are placed on the roadway to warn drivers. Also, any runoff water will impact Towers Street, especially when the street is busy during Towers Elementary's drop off/pick up hours. Has the impact of any runoff water from the construction site been considered? Please assess the water runoff in your study.

KM-11

- Has there been any discussion with representatives from TUSD regarding this project and the potential impact to students, teachers and employees of the nearest schools? They need to be made aware in order to budget and fund for third party and workers' comp claims they are likely to receive from those impacted by this project. They also need to be aware of days when air quality standards may be impacted by the construction in order to keep children indoors on poor air quality days. Not knowing if your study includes impacts to other entities, I've decided to reference this anyways.

KM-12

- The construction site will impact property values of the Torrance homes east of the project. Ocean breezes from the west will no longer be a selling point as the air quality will be negatively impacted. Increased traffic from the construction site will increase the noise level in the area as well as decrease the safety of cars and pedestrians who will be forced to share the roads with the project site's vehicles. Who would want to buy a home in the shadow of a 15-year construction project? If your study also includes impact to property values, your analysis would be appreciated.

KM-13

- Ironically, the construction of the new BCHD will impact the health and wellness of Torrance residents and local TUSD students for the next 15 years. And, only beach residents from Redondo Beach, Hermosa Beach, and

Manhattan Beach are being offered facility discounts while Torrance residents are not and will be left in the dust, literally. If your study includes health and wellness opportunities for Torrance residents, your review of this matter would be appreciated.

KM-14

- The third phase of the development is not funded; therefore, the center of the project will be vacant land until there is funding. Without funding, the center of the site could be vacant forever. Ideally, the majority of the vacant land should be located at the eastern side of the property, closest to Flagler and the Torrance city boundary. This vacant land can be converted to open air parking as needed covered by solar panels. Solar panels would be a win-win situation by providing decreased costs for BCHD and eliminating the need to create subterranean parking for a Phase 3 site that is not funded. There is no reason to create unnecessary subterranean parking with so much unused space on the site. Other design options should be considered based upon funding, best use of land, reducing impact to the West Torrance neighborhood, and common sense. Your analysis of this option would be appreciated.

KM-15

Thank you for allowing me the opportunity to share my concerns and comments with you.

Sincerely,
Kathy Merkovsky

From: EIR <eir@bchd.org>
Sent: Thursday, July 25, 2019 10:00 PM
To: Meisinger, Nick
Subject: Fw: New construction at Beryl & Flagler

From: v minami <evirginias@hotmail.com>
Sent: Thursday, July 18, 2019 9:37 PM
To: EIR <eir@bchd.org>
Subject: New construction at Beryl & Flagler

Hi,

□M-1 I am hoping that you can consider the impact your project will have on the residents nearby. Would you like to live in a construction zone for 15 years? There are health issues for residents and pets I am sure with this extended amount of noise and pollution. I would also prefer for there to be no entry to the site from the Flagler/ Beryl side. I think it is Waze that made our quiet neighborhood into a short cut for some who don't pay attention to speed or stop signs. Towers Elementary's back entry is here and I hope you can consider the safety of the little ones.

□M-□ Thank you,
Virginia Minami

Sent from my iPhone

From: EIR <eir@bchd.org>
Sent: Thursday, July 25, 2019 10:10 PM
To: Meisinger, Nick
Subject: Fw: Comments Regarding Proposed Beach Cities Health District Project

From: Mark & Donna Miodovski <dzahyna@verizon.net>
Sent: Tuesday, July 23, 2019 12:25 PM
To: EIR <eir@bchd.org>
Subject: Comments Regarding Proposed Beach Cities Health District Project

MM-1 Thank you for the opportunity to comment on the proposed Beach Cities Health District project. As a resident of the adjacent housing tract to the east of the project on Redbeam Avenue, my comments concern the possible adverse impacts that the project as proposed will have on vehicular traffic in our neighborhood. I look forward to reviewing whatever changes and/or mitigation measures will be developed to address these concerns.

The Initial Study document appears to have an inconsistency in how it discusses proposed access to the new two-level, 120,00 sq. ft. parking garage. On page 13, it notes that: *"Access to this new parking garage would be via the northern entrance along North Prospect Avenue and/or a new entrance off of Flagler Lane, located approximately 100 feet south of its intersection with Beryl Street."* On page 20 however, it states only that *"Access to this new parking garage would be via a single entrance off of Flagler Lane, located approximately 100 feet south of its intersection with Beryl Street."*

MM-1 Please remedy this inconsistency in your EIR. Access to the parking garage should only be provided along Prospect Avenue, as that is the current traffic pattern for the facility. By providing a different access point for vehicular traffic on Flagler Lane, you would be diverting substantial traffic into a residential community. In order to access the parking garage via Flagler Lane, many motorists approaching the facility from the south and east will use Redbeam Avenue and Towers Street as a cut-through, rather than use Prospect (then having to turn right at Beryl and right at Flagler).

As a resident of Redbeam Avenue, I can personally attest to the fact that many motorists already use our street as a shortcut to avoid traffic on other major streets, such as Del Amo Boulevard, Prospect Avenue, and 190th Street. My neighbors and I have been soliciting the help of the Torrance City Council and Police Department for many years to crack down on motorists who speed through Redbeam as their shortcut; unfortunately requests for speed bumps have been repeatedly denied. The City did erect a new stop sign at the corner of Redbeam and Norton Street (near Sunnyglen Park), which has had a minor effect on vehicle speed, but not vehicle volume. If you examine vehicle volume studies, you will see that Redbeam Avenue has much greater activity than one would assume for a small residential street. I fear that by providing access to the parking garage from Flagler Lane, you would only exacerbate the traffic situation in our neighborhood. Please reconsider the recommendation to place an access point to the parking garage on Flagler Lane without effective mitigation measures.

MM-1 I would also note that the large two-tiered stairway on Flagler Lane adjacent to the Child Development Center appears to be excessive, if not impractical. Without a dedicated lane for dropping off users and visitors, cars stopping to drop off and pick up passengers at this point will cause additional traffic back-ups. A more feasible solution would be to: 1) eliminate the stairway on the east side of the project; 2) create a dedicated lane on Beryl Street for dropping off and picking up passengers; and 3) expand the facility to the east (toward Flagler Lane) where the proposed stairway is currently situated, and reposition the stairway to the west side (adjacent to the shopping center parking lot).

Sincerely yours,

Mark Miodovski
19710 Redbeam Avenue
Torrance, CA 90503

(310) 465-9953
dzahyna@verizon.net

From: EIR <eir@bchd.org>
Sent: Thursday, July 25, 2019 10:11 PM
To: Meisinger, Nick
Subject: Fw: Beach Cities Development

From: Tom <otterpop5@yahoo.com>
Sent: Tuesday, July 23, 2019 12:59 PM
To: EIR <eir@bchd.org>
Subject: Beach Cities Development

Dear Nick,

It has come to my attention that a massive new complex is being proposed in the current Beach Cities Health District campus. We in the community have major concerns as to this development.

TM-1 First, the development is scheduled to take 15 years to complete, which will involve years and years of noise pollution, construction, traffic delays on Flagler, potential contaminants becoming airborne in the region including the possibility of asbestos as the old buildings are torn down, etc. We are very concerned about the idea of something like 9 years of construction and extreme noise pollution disrupting our neighborhoods.

TM-□ Of additional concern is the total disruption of Flagler and the Vons shopping center by the building of a massive parking structure in that area. It sounds like years and years of construction work that will totally disrupt the surrounding communities who depend on that street and that shopping center. We do not want a parking structure there.

TM-□ We ask what are the plans to mitigate construction noise pollution and to avoid contamination, particularly asbestos, from becoming airborne and affecting the surrounding neighborhoods?

TM-□ We ask what are the ramifications for wildlife and endangered species in the region?

TM-□ We ask why the BCHD feels the need to impose an elder living facility in this area when it was not requested nor desired? We are concerned that the influx of 545 residents in that area, coming and going, plus buses to transport them, will clog residential streets and change the quiet nature of our community.

TM-□ We ask who is the funding sponsor behind this development and who stands to profit from this "non-profit" development?

TM-□ We also ask how this massively tall set of structures will impact nearby houses by casting permanent shadows over yards and houses below it which will reduce property values in the area.

TM-□ In short, we, as a community, are against this development as planned and we resist the imposition of it on our neighborhoods and the total disruption of our community for 9-15 YEARS of construction.

TM-□ At the very least, we request that this structure be reduced in size and scope and that construction disruption of our community will NOT last years and years. We request a thorough environmental impact study be conducted that will address wildlife in the region as well as LOCAL COMMUNITIES and how noise pollution and construction and contaminants will impact the nearby neighborhoods. We also

TM-1□ request that a study be done to assess the impact of this development on the future of our community, from traffic to noise to influx of residents to disruption of the peace and quiet of current neighborhoods nearby. We also request a study of the impact

TM-11□ on school children walking to and from school along the affected routes and also an impact on the local high schools and middle schools nearby. Construction and noise pollution will totally disrupt classes going on nearby for YEARS.

Please pass this along to the powers that be and consider it a firm resistance to this project by the community at large.

Regards,

Tom Momary

Ramos, Ryan

From: EIR <eir@bchd.org>
Sent: Friday, August 2, 2019 1:35 PM
To: Meisinger, Nick
Subject: Fw: Project Concerns

From: Justine Muus <justinedmuus@hotmail.com>
Sent: Sunday, July 28, 2019 9:02 PM
To: EIR <eir@bchd.org>
Cc: HLCInfo <HLCInfo@bchd.org>
Subject: Project Concerns

JM-1 | We are right below on Tomlee Ave. A very quiet neighborhood. Obviously 15 years of construction is going to make a lot of noise and flying dust debris. Also coming in and out of Flagler with so many kids it's such a tiny street.

Ramos, Ryan

From: EIR <eir@bchd.org>
Sent: Friday, August 2, 2019 1:28 PM
To: Meisinger, Nick
Subject: Fw: BCHD Healthy Living Campus

From: Candace Allen Nafissi <candacekallen@gmail.com>
Sent: Friday, July 26, 2019 4:19 PM
To: EIR <eir@bchd.org>
Subject: BCHD Healthy Living Campus

To whom it may concern:

Beach Cities Health District serves Redondo, Manhattan and Hermosa Beach. Yet the City of Redondo is bearing the consequence of this project. We live in an incredibly densely populated and overdeveloped city, we can't afford to have this project. Redondo is saturated with 7 senior complex and 2 assisted living facilities.

CN-1 The first responders have shared that the first places they will go in a disaster is where there is a concentration of seniors; which will be assisted living facilities. There will be an increase in the need for first responders and the current residents will be asked to foot the bill. Secondly, we can't even afford to pay the first responders what they deserve and now we are asking them to be more responsive?

CN-2 Prior to proposing a project of this magnitude of 420 units for the elderly, BCHD should have been doing research in Redondo, to ensure that you are really meeting the needs of this population and doesn't impact the first responders.

This is the list of existing senior housing and assisted living facilities in the city of Redondo are as follows:

- Salvation Army: corner of Beryl and Catalina Ave. across the Crown Plaza Hotel and next to Hotel El Redondo.
- Casa de Los Amigos: by the beach, 123 S. Catalina Ave.
- CN-3 · Seaside Village: 319 N. Broadway corner with Carnelian, across the City Hall.
- Season: 109 S. Francisca Ave facing PCH, between Emerald St and Gardner St. former site of Mc Candles School demolished.
- Heritage Point: 1801 Aviation Way [another school site eliminated]
- The Montecito: 2001 Artesian Blvd corner with Green Ln. It is a 4 stories building [mixed use] that has affected all the properties behind.
- Breakwater Village: 2750 Artesia Blvd, huge complex next to the Best Western Inn
- Silverado: assisted living facility, 514 N. Prospect Ave inside the BCHD.
- *Opened this year* The Kensington: assisted living facility, 801 S. PCH location of Paterson School which was demolished.

Most of the residents in the complexes above are coming from all over the south bay-- very few are from Redondo only. This project doesn't even secure spots for Redondo residents, yes the Redondo residents bear all the impacts—is ridiculous. Adding residents that impact our services, affect our quality of life, increase our city budget, and place pressure on our first responders and residents [that are paying for Redondo] without sufficient community input—is ludicrous.

CN-4 I strongly urge that BCHD consider a different location outside Redondo Beach AND scale down the size of the project. In addition, BCHD bought the corner lot of Flagler and Beryl, from a petroleum
CN-5 company that was pumping oil for years from that soil. Besides if the soil is contaminated: who will pay for the cleanup? The Petroleum Company or BCHD with the money it receives from our taxes. BCHD stated that it: “has been working with the community to reimagine our aging campus to better reflect our mission and meet the current health needs of Hermosa, Manhattan and Redondo
CN-6 Residents”. Never once have the residents on Paulina Avenue (One street over) been contacted to get engaged.

Very few surrounding neighbors were informed of the meetings, because they never were well promoted. BCHD Healthy Living Campus is in reality a concentration of 420 Residential Care for the Elderly units!!, that they will be added to the collection of senior facilities that Redondo already has plus its consequences. Redondo cannot be the dumping place of a project of this magnitude, every beach city needs to share the burden, in this case in particular the other cities that BCHD serve.

At your service,

Candace Allen Nafissi, MPA

Los Angeles County Beaches & Harbor Commissioner

Redondo Beach Library Commissioner

Redondo Beach General Plan Advisory Committee Member

Telephone: 310-245-5871

Email: Candacekallen@gmail.com

NATIVE AMERICAN HERITAGE COMMISSION

Cultural and Environmental Department

1550 Harbor Blvd., Suite 100

West Sacramento, CA 95691 Phone (916) 373-3710

Email: nahc@nahc.ca.govWebsite: <http://www.nahc.ca.gov>

Twitter: @CA_NAHC



July 23, 2019

Ed Almanza
Beach Cities Health District
1200 Del Amo Street
Redondo Beach, CA 90277

RE: SCH# 2019060258 Beach Cities Health District Healthy Living Campus Master Plan, Los Angeles County

Dear Mr. Almanza:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

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The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a. Whether the proposed project has a significant impact on identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

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7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
 - a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
 - a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
 - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
 - a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18's provisions include:

1. **Tribal Consultation**: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation**. There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality**: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation**: Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

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Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

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3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

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If you have any questions or need additional information, please contact me at my email address: Steven.Quinn@nahc.ca.gov.

Sincerely,



for Steven Quinn
Associate Governmental Program Analyst

cc: State Clearinghouse

Ramos, Ryan

From: EIR <eir@bchd.org>
Sent: Friday, August 2, 2019 1:29 PM
To: Meisinger, Nick
Subject: Fw: Healthy Living Campus

From: Neal Linda <lindarneal@gmail.com>
Sent: Friday, July 26, 2019 8:35 PM
To: EIR <eir@bchd.org>; HLCInfo <HLCInfo@bchd.org>
Subject: Healthy Living Campus

To BCHD Board

I went to earlier meetings but haven't been able to go to the recent ones.

LN-1 I have serious concerns about the size and scope of the plan. I want a center for the community, not a senior living facility.

A place for the public to go for classes, a gym, an amphitheater, open space. a picnic area, a park, maybe a dog park, places for the public to gather. 400+ housing units seems like an awful lot for this space if we are thinking at all about community activities to serve all the citizens.

I repeat, I have reservations about the current plan for this space on Prospect.

Sincerely,
Linda Neal
1110 Ynez Avenue
Redondo Beach, CA 90277
310.316.9931
lindarneal@gmail.com

April 22, 2019

Mark Nelson

menelson@gmail.com

CWG Member – Redondo Beach local neighborhood, Prospect Ave.

Comments on Potential BCHD HLC Project and NOP/EIR Formulation

BCHD Board of Directors and Staff:

As a member of the Community Working Group, I have made many of these comments in writing or in discussion during our group meetings. Typically however, our discussions in the CWG are more along the lines of framing the project and reacting to proposals, and they are less about the multi-facets of the environmental analysis and City of Redondo permitting. In any event, my prior comments have not been made in light of a potential NOP, and as such, I am using typical portions of an EIR table of contents to guide this comments.

These comments are predominantly written from the perspective of the local Redondo Beach Beryl Heights neighborhood where I live, which is most likely to be impacted by the project in both the construction phases and the ongoing operations.

Project and Program Description

As is mandatory for an undertaking such as the Healthy Living Campus, the project must be described in detail. Because this is mixed-use (residential, public, professional, food service, and perhaps retail), the neighborhood residents will require significant detail to evaluate and determine its ultimate support or opposition based on the benefits and detriments of the proposal. A number of specific issues come to mind, including but not limited to descriptions and dispositions of: the specific facilities for use by area residents, the timing of development of those facilities, the displacement (and accommodation) of medical services that many of us currently use in the 510 building, anticipated phasing and timing, operating days and hours, and the project's physical characteristics. Because this is a program, that is, a series of related projects across a significant timespan and likely several management teams (up to 15 years), a detailed description of each phase, its timing, and its linkages to other parts of the mixed-use campus is required. An example would be the timing and linkages of residential housing, the Center for Health and Fitness replacement, meeting rooms, cafes, etc. Also, the impacts cannot be determined without an understanding of pricing and subsidy policies, such as: pricing policy for residential assisted living, food service, fitness clinic, and other products and services.

Alternatives

The CWG has had only brief discussions about alternatives, and they included additional/replacement land leases such as 510 and 520. No other uses other than the HLC have been brought forth that I am aware of, and I believe that a robust set of alternative uses of the BCHD land is needed.

No Project Alternative

The CWG has had a limited discussion of the No Project Alternative in the form of some financial projections of the retirement of 514. The No Project Alternative is not well understood to my thinking, and it requires significant development and explanation such that the surrounding neighborhood can understand what happens if the HLC or one of its alternatives fail to move forward. Some examples include: a parallel to the AES Power Plant (shutdown, decommission, park land), sale for real estate or other development, alternative use of the existing buildings, termination of BCHD, etc.

Purpose and Need

BCHD and its activities were a deviation from the South Bay Hospital that preceded it. The HLC will be a deviation in some activities (district owned rental housing) from the BCHD activities to date.

Given that health districts in California have a variety of functions, a crisp discussion of the purpose and need of the project will be very helpful. Over two years of discussion, the CWG has inferred

- MN1-5 purpose and need, but communications to the adjacent landowners will need to be full, concise and persuasive. Further, recent CWG discussions have focused on the HLC being a financial engine for the BCHD other activities, and also as an engine to discount the cost of assisted living for financially
- MN1-6 qualified local residents. That discussion seems to be an integral part of purpose and need that is currently lacking a concise written form.

Aesthetics

From the local neighborhood perspective, I continue to have my stated concerns about mass, height, setbacks, artificial lighting, sun reflection, and invasion of the visual privacy of the surrounding homeowners. Simulations, elevations, illustrations, and models will be needed to provide an adequate disclosure of the design. Again, because this is phased, it will be important to understand timing and activities on the BCHD site during the decade to 15 year interim period.

- MN1-7

Air Quality

While I don't currently anticipate any specific air quality issues, I am concerned that exhaust from the underground parking and from any food preparation facilities are not a burden on the local receptors.

- MN1-8 As a result, the program should disclose and analyze emissions beyond any onsite cooling towers, generators, boilers or other equipment and include food preparation and parking ventilation at a minimum. Construction is another issue however with respect to air quality impacts, with demolition debris, truck and transport emissions, PM2.5s and PM10s from all sources, concrete flydust, fugitive dust, portable generators, construction equipment, and other concerns. It is likely that the buildings are
- MN1-9 laden with asbestos (to be discussed in HazMat) and any wind drift causing toxins to spread will be unacceptable to the neighborhood, therefore, any potential winddrift accumulated biohazard will need to be managed during demolition.

Biology

The biological impacts of the changing use of the BCHD campus will be analyzed, with special emphasis needed on urban wildlife such as coyotes, raccoons, opossums, rats, mice, raptors, feral cats, nuisance animals and insects, etc. The neighborhood, its children and pets are at risk from potential disease and attack.

- MN1-10

Energy

Neighborhood concern regarding energy would arise in the long term if the facility had significant onsite generation that would either pose a potential fuel and emissions hazard, or, a local area line voltage fluctuation. Concerns over diesel fuel generator use during construction are needed, and disclosure is required for the neighborhood's review.

- MN1-11

Geotechnical

Aside from proper retaining walls, removal (not abandonment) of buried piping and tanks, etc., I see no particular geotechnical concerns from a neighborhood perspective. The standard analysis should suffice, including disclosure of the local seismic background.

- MN1-12

GHG

MN1-13

GHG is a global issue. Again, the neighborhood may have concerns if BCHD uses onsite alternative energy generation to mitigate GHGs, as wind turbines and solar panels can have unintended side effects to wildlife, create noises that curtail neighborhood quiet enjoyment of our property, or create solar panel glare or heat islanding. Any plans for onsite GHG mitigation should be disclosed.

HazMat

MN1-14

Biohazards, biowaste, asbestos, PM_{xx}, diesel, fuel oil, underground tanks, buried pipelines, etc. both during demolition and during long term operation are a neighborhood concern that will require disclosure.

Hydrology

MN1-15

Water capture (rain), water runoff (rain), and water runoff (irrigation) are at present the only impacts that I see of concern to the neighborhood. BCHDs analysis will need to assess their needs for construction.

Land Use/CUP

MN1-16

A clear understand of the future land uses for the project, alternatives and no project will be needed for the local area to understand its optionality with respect to the project. Covenants on long term use may be required for neighborhood support to assure that the site does not become an incompatible use with the neighborhood, for example. Notwithstanding legal opinions, the local area may opt to sponsor a local initiative “vote of the people” for any change in use of the site that was originally, legislatively a hospital and was never contemplated for 400 residential units.

Noise

MN1-17

The current facility has significant operational noise with emergency vehicles, vehicle traffic, loading and unloading, trash collection, night and weekend maintenance, etc. that impact the adjacent neighborhood. A curtailment of long run noise is compatible with the housing component of the project and with the neighborhood. A decade of construction noise and any amplified or acoustically concentrated (constructive wave interference) noise from the green space or circular building will need to managed heavily as well. If the Beryl Heights neighborhood is at the mouth of a de facto amphitheater, it is unlikely that the neighborhood will support the project. Noise, both long term and construction, is a very, very important design factor and concern.

Population and Housing

MN1-18

The Residential Care Facility for the Elderly (or assisted living) housing will be 400 beds from our initial understanding. That is equivalent to about 125 local area homes homes, or roughly 4 blocks of the surrounding homes worth of additional population and housing. While that doesn't seem large, it will be incumbent on BCHD to explain the impacts from services, occupant traffic, visitor traffic, rideshare traffic, and other ancillary local impacts.

Public Services and Utilities

MN1-19

California is in the midst of a homeless crisis. Large open spaces are double-edged swords, and will require tight management by the BCHD or lessees in order to assure that the neighborhood does not end up with an encampment or increased levels of transients. Thus, a full description of both private security and policies, along with a participating agency analysis by the RBPD and perhaps surroundings Pds will be needed for local neighborhood assessment of the project. In addition, the usual gas, water, sewer, and power analysis by local suppliers will be required to understand any local impacts, such as drainage, sewer, water supply, gas/power, or other public utility services.

Transportation and Parking

MN1-20

South Bay Hospital had a very negative relationship with the local community with regard to parking. Undersizing the parking at BCHD, or assuming high proportions of rideshare or other parking-reducing actions must be revealed and carefully analyzed. In the 1980s and 90s, the surrounding neighborhoods were forced to use permit parking as result insufficient and overpriced parking at South Bay Hospital, along with poorly managed employee parking policies. That has happened once, and cannot be allowed again.

MN1-21

BCHD traffic emerging from the 510/514 shared driveway has been a long term, unsafe situation. Emerging traffic often does not yield for pedestrians in the crosswalk, creating an unsafe situation. Further, the same traffic heading south asserts an illegal right-of-way and fails to yield to traffic exiting the Prospect frontage road that has the clear, legal right-of-way. As a result, traffic control at the intersection must be modified during this development to assure the legal traffic rights of the area residents. Perhaps the 510/514 driveway should be removed, with access points limited to the existing exits on Prospect to the south of 510 and the north of 520. In any event, the current situation is unacceptable.

This is not intended to be a complete issue listing, however, it will hopefully provide a view from a local resident, who in my case, is approximately 100 feet from my east lot line to BCHDs west lot line at the 510 building according to inspection using Google Earth. Thank you for the ability to participate in this process from the beginning, which will hopefully avoid many of the project pitfalls and conflicts that I've witnessed over the past several decades. Assuming my schedule cooperates, I plan to attend the BoD meeting on the 24th of April.

Mark Nelson

From: Leslie Dickey <Leslie.Dickey@bchd.org>
Sent: Tuesday, July 09, 2019 8:26 AM
To: Cristan Higa; Dan Smith; Meisinger, Nick; Ed Almanza
Subject: FW: Is someone working on the rest of the construction traffic estimates?

FYI

Leslie Dickey

Executive Director of Real Estate

Beach Cities Health District

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From: "Mark Nelson (Home Gmail)" <menelson@gmail.com>
Date: Monday, July 8, 2019 at 1:02 PM
To: Ed Almanza <Ed.Almanza@bchd.org>, Leslie Dickey <leslie.dickey@bchd.org>

Subject: Is someone working on the rest of the construction traffic estimates?

As a first cut, I used FEMA guidelines for demolition/haul-away and a 300,000 sqft City of LA senior citizen complex's EIR traffic estimates for inbound materials/inspection and I get about 30,000 total trips between excavation, demo, concrete, materials and inspections, not counting any worker traffic that I assume will be all off-site with shuttles. If not, the numbers go up considerably.

M□□-1

I'd be interested if you have anything underway or completed yet, since I'd hate to see this dumped on the neighborhood late in the EIR process. The construction plan traffic plan is definitely a major sticking point. Several times at CWG I have brought this up and proposed grading the Flagler & Beryl lot for use with heavy demolition traffic. This isn't new info from me. Using the Prospect frontage only for heavy haul, debris, etc. is going to be a non-starter with the local neighborhoods.

I don't want this to come out of left field ... since it's been served up several times before.

From: Ed Almanza <Ed.Almanza@bchd.org>
Sent: Tuesday, July 16, 2019 11:13 AM
To: Meisinger, Nick; Gira, Daniel
Subject: Fw: scoping comments

Nick, Dan

Below, Mark responds to my earlier follow up questions, asking for more info on comments he made before the NOP went out. I'm glad to have this info, as it's useful for the EIR's description of existing conditions as well as a heads up on potential noise sources and other issues of the project. This and future emails from him during the scoping period I will pass on to be treated as NOP responses. (His responses are at the tail end of my questions.

Thanks.

Ed

From: Mark Nelson (Home Gmail) <menelson@gmail.com>
Sent: Monday, July 15, 2019 7:58 PM
To: Ed Almanza
Subject: Re: Still reading the NOP

see below

On Mon, Jul 1, 2019 at 6:40 AM Ed Almanza <Ed.Almanza@bchd.org> wrote:

Mark,

Thanks for sending these questions and thoughts.

Yes, agree, the need for the project needs to be discussed in the EIR, and that relates directly to the alternatives.

The no project alternative is required by CEQA, of course, but the full range of alternatives is developed as a result of the impacts assessment (it wouldn't be presented in an NOP).

Bldg heights and views from key public viewpoints -- will also be presented and discussed in the EIR.

Can you share more information from your earlier comment on existing operational noise generated at the site?

There's a fair amount of late night noise that reverbs off the front of the bldgs and shakes glass across the street. I don't know if it's carpet cleaning or drain cleaning or stream cleaning - but usually 10PM - 4AM. Periodic daytime shredder truck in front of 510 doors that makes a fair amount of noise. last example i recall was concrete cutting all night in 510, but must have had doors open, because it was not contained noise.

MN3-1

Do you have thoughts on any site-specific circulation hazards (existing conflicts between pedestrians and vehicles, for example) in the vicinity?

MN3-2 I saw Dennis Heck was worried about crossing to BCHD for the gym. There's a problem with egress from the main entrance - BCHD traffic fails to yield when turning left/south and I have one car that was hit (I still have it). They also don't yield to pedestrians.

MN3-3 Illegal U turns of north traffic at the 514 stoplight are frequent are are illegal lefts that run the red light to turn into BCHD on southbound traffic.

MN3-4 There's been a number of asks to separate the Prospect Frontage egress from the BCHD egress so they don't compete. pat flannery can give you more info of that.

Thanks.
Ed

From: Mark Nelson (Home Gmail) <menelson@gmail.com>
Sent: Sunday, June 30, 2019 1:41:32 PM
To: Ed Almanza; Leslie Dickey
Subject: Re: Still reading the NOP

MN3-5 I don't see the no project alternative anywhere (or any other alternatives)

MN3-6 As a public agency, it seems that at a minimum, BCHD needs to make the case that 1) adequate housing would not be developed by the market for the service area, 2) other sites would have at least equal, if not greater impacts, and 3) this housing would be at least as affordable, if not more affordable than market housing for the service area. The issue that's been brought up of this being merely an economic engine for BCHD will need to be dealt with, because all the environmental impacts flow directly from that issue.

Thx.

On Sat, Jun 29, 2019 at 8:15 PM Mark Nelson (Home Gmail) <menelson@gmail.com> wrote:

few questions

1) way back when, the CWG saw a plot plan that showed the new building footprints superimposed over the existing. can you send me that?

MN3-7 2) can you provide the specific heights of 510 bldg at the prospect frontage, and the heights of the new building in phase 3? It's a steep drop off on the road, so an easy height would be the one at the north driveway.

MN3-8

3) Any reason that you didn't provide estimates of truck traffic from construction? I found a 350,000 sqft senior project CEQA from a few years back (started pre-recession, emerged something like 201) and they had to have estimates for the traffic study, so I used theirs and non-worker materials construction traffic is a pretty large number

4) having done more than one of these, I assume the CAD program of the architects can provide an simulation from the frontage side of the road. Can we get that from a pedestrian standing at the light waiting to cross from the west side, or, from the lot line of the owners in the 501-511 strip of N Prospect?

Thanks!

Mark Nelson
menelson@gmail.com
BCHD HLC CWG Member

July 29, 2019

BCHD Board of Directors HLCInfo@bchd.org
EIR NOP Comment Processor EIR@bchd.org

SUBJECT: Comments on NOP and Response to Public Meeting Presentations

As I noted in my April 2019 letter and comments to the BCHD Board (attached and formally submitted as additional NOP comments as well), the work on the HLC has been high level to date, and we have in several meetings acknowledged that the Devil is in the details. We are at that stage requiring details, and it is very difficult for the local neighborhoods to understand a project of this magnitude without understanding the construction project details first, and they derive from the project details. Those details needed involve the specific site layout, the paths and timing of the tens of thousands of construction vehicle trips, the plan for the hundreds of thousands of worker trips, the ingress and egress from the site, detailed renderings and lot plans demonstrating receptor views from street level in each neighborhood, and definitive setbacks from each lot line. The NOP and related presentations contain generally “beauty shot” aerial views of the project that are intended to sizzle, not to inform. They provide no specific receptor views of “as is” and “as proposed.” Without at least such views, I cannot imagine how local residents can make informed comments on the NOP, especially on project mass, privacy invasion, night lighting, sun glare and exterior signage. We are currently light on details based on my personal project experience as both proponent and opponent of other projects.

Below are comments on the project and process as requested in the public meetings, and specific comments on the NOP. In addition I have included some mitigations as discussed and circulated in the local neighborhood for incorporation into my NOP comments and for the Board record. Further, I have put forward a set of principles for decision-making for the rest of the HLC and EIR process.

We are at the front end of the process and more information about the project needs to be developed and/or disclosed soon to the surrounding neighborhoods, and not as part of an FEIR comment document over the winter holidays as currently scheduled in the draft schedule I received. I was out of town when the NOP schedule came out and like roughly 20 of the 24 CWG members (based on my understanding) I was unable to attend the June 2019 meeting. I believe the NOP and EIR are premature, and that more work and information was needed in order to gain understanding of the EIR and CUP by the adjacent landowners and neighborhoods. However, we are where we are, and the path forward is likely rockier than it might have been and requires robust responses and community discussion, especially of the local neighborhoods that have wholly disproportionate burden-to-benefit profiles from all other participants.

Sincerely,

Mark Nelson
BCHD CWG Neighboring Resident

Attachments

Note: In order to avoid any ambiguity, this document and all emailed attachments with its transmission are submitted in their entirety as comments to the NOP and to the BCHD BoD.

Introductory Comments

As I've been reiterating in the Community Working Group meetings over the past 2 years, the "Devil is in the details" when it comes to specifying the project, construction methods, and mitigation in order to make a determination of acceptability to the local neighborhoods that surround the project. With the release of the NOP and an in-progress analysis, we have now reached the point where more information about the specifics of construction methods needs to be disclosed and analyzed with the local neighborhoods to determine whether or not the residents of the surrounding areas will support or oppose the project as presented. The construction methods should not be presented with a 45 day comment period as part of the draft FEIR that is scheduled to appear during the holiday period at the end of 2019. The NOP during June 2019 has been a struggle for local neighborhoods as it overlapped with both the end of the 2018-19 school year and the summer vacation season.

MN4-1

The concluding project year, 2033, is beyond the lifespan of many neighbors who should not spend their final years with congested traffic, flying dirt, noise, and other impacts for which they will gain no likely benefit. Mitigation to less than significant on all CEQA impacts is fair and required. Unfortunately, there are two obstacles. The intergenerational nature of the project requires that the impacts and costs be borne by those who will benefit, and the local neighborhood is significantly, and likely non-mitigably impacted and unlikely to be able to recoup the burden load from the project.

Viewing the Proposed BCHD Project Through the Lens of History

When South Bay Hospital was formed, and a location was selected, and a parcel tax was approved, and no one anticipated its ultimate failure as a hospital and conversion to a health care district with a very, very different objective. As a result, no one could have foreseen the substantive change of use of the location from a hospital with associated medical services to what is outlined in the Notice of Preparation (NOP) as a 420 unit specialty apartment complex for assisted living and beyond. Per the NOP, there are planned to be 162 units in Phase 1, 99 additional units in Phase 2, and 159 units in Phase 3, for a total of 420 units across the three phases. By any standards, a 420 unit apartment complex filled with tenants who either cannot, or choose not to live without assistance will become a burden on local emergency resources due to frequent ambulance, paramedic and coroner visits, as well as, the adjacent local community that never agreed to a such a large, ongoing project that will, in general, not be affordable to them based on income requirements in the BCHD sponsored studies. Those studies show after-tax cash flow requirements of target households of \$10,000 to \$13,000 per month, which is well above the local neighborhood averages for 65 and 75 year old head of household homes. While unstated in the report as I read it, the after-tax cash flow requirements of the target households is assumed to a PER RCFE OCCUPANT price tag. That unlikelihood of affordability for adjacent neighbors, is amplified by the other services that are planned to be offered at the site and their related construction, traffic and services vehicles.

MN4-2

MN4-3

MN4-4

In short, the local neighborhood never signed up for the construction impacts of this sort of project, and with the high levels of income required, the local neighborhood is generally locked out of its benefits as well without a firm, written commitment to subsidies for the local neighborhoods. Based on the market study, a majority of non-BCHD zipcodes are under consideration that expand project size beyond the Beach Cities jurisdiction and its own mission statement to serve the Beach Cities and those who work there. Even taken most liberally, that implies no obligation, nor authorization, to size facilities using market studies that project unit occupancy by non-Beach Cities residents.

The Change from Hospital to Residential Living has Dis-benefited the Surrounding Neighborhoods
South Bay Hospital provided much needed emergency services to the community that have been shut down for over 25 years. If the local community does not receive substantial aging in place assistance from this BCHD project – or other services applicable to the directly local residents included explicitly in the program plan - then the local community is worse off from supporting 10-15 years of construction and 50 years of sirens, traffic and increased residential density, and the local community should petition the City to deny the conditional use permit.

MN4-5 The Construction Burden Alone is Significant, the Project is larger then CenterCal’s Proposed Development in both Demolition and New Build Square Footage, and undoubtedly Non-mitigable to less than significant to the Surrounding Community`

A tabular summary of the project construction is below. The structure demolition truck trips are estimated using standard FEMA 329 guidelines and methods. The non-worker, construction truck trips represent an estimate based from a recent CEQA EIR for a 336,000 square foot senior living center, with construction traffic analysis from 2012. The results are remarkably close to the draft FEIR transportation estimates of the CenterCal FEIR.

MN4-6 While the BCHD project is different than the CenterCal proposed project, it is larger both in terms of demolition and terms of construction and it’s impact on the immediate surrounding neighborhoods will be significant and non-mitigable for commuters and residents if consistent with the Fehr work from CenterCal draft FEIR. CenterCal has the ocean to the west, commercial to the north and south, and limited direct abutment of residential to its east. BCHD is an island in a sea of residential housing, except for a small strip mall that specifically services the neighborhood. As noted above and discussed below, it is much less clear that the local neighborhood will benefit from the project, but 100% certain the local neighborhood will be burdened.

Estimated Construction Burden from Proposed Project¹

	SQFT Build	SQFT Demo	Res Units	Time (yrs & const.)
Phase 1	170,000	163,000	162	2021-24 (3 yr)
Phase 2	130,000		99	2026-2029 (3 yr)
Phase 3	300,000	106,000	159	2030-33 (3 yr)
Total BCHD	600,000	269,000	420	2021-33 (9 yr)
CenterCal EIR	511,000	207,000	n/a	Approx 2-2.25 yrs per EIR

	Excavation Demo Truck Trips	Bldg Demo Truck Trips <u>FEMA 329 method</u> (8 CY)	Concrete Delivery Truck Trips	Materials Delivery Truck Trips 2001-1196-EIR (3 trips/100 sqft @ 50% of max daily traffic)	Total Truck Trips, Light and Heavy (non worker)	Calcs
Phase 1	3500-5000	2500	950-1200	5100	12000-14000	$((163000*10*.33)/27)/8$
Phase 2	750-1500		450-575	5000-7000	6000-9000	
Phase 3	Unknown	1600	850-1050	9000	11000-12500	$((106000*10*.33)/27)/8$
Total	4250-6500	4100	2250-2825	19000-21000	29000-35000	
CenterCal EIR	n/a	n/a	n/a	n/a	Truck=53,200 Worker=350,000	133/day * 2 yr * 200 days (per EIR)

MN4-7 As the analysis shows, building on the work attached to the NOP using FEMA and City of LA ENV 2001-1196-EIR , there will be nearly 10,000 heavy truck trips of 8-10 cubic yards to remove excavation, buildings, and parking ramps. There will be roughly another 20,000 materials and construction trips (not including worker traffic) with a variety of vehicle types across the period. This represents an enormous burden that many original owners and elderly in the surrounding neighborhoods will not see to completion due to the advanced age and declining health.

MN4-8 Phase 3 Appears Under-defined and Cannot be Analyzed or Certified as Written
 MN4-9 Phase 3 in general has too little detail to complete an EIR, and as a result, additional work or covenant constraints are required or Phase 3 should be removed entirely from the EIR process. In terms of covenant constraints, some examples are: the existing 510 N. Prospect Building must be required to govern the minimum setback from N. Prospect Ave., the maximum height of Phase 3, and the maximum frontage width of the replacement Phase 3 building. The current NOP document does not have sufficient detail to analyze the impacts of Phase 3, however, based on renderings, Phase 3 appears to be closer to N. Prospect (reduced setback), taller than the existing building, and to have a substantially wider frontage than 510 N. Prospect. The mass, coupled with anticipated mid-day to

¹ Little construction detail was available in any of the attached reports distributed with, or referred to, in the NOP. This resulting in the need to estimate the burdens in order to provide NOP comments as to the extreme importance of and burden of construction on the local neighborhoods.

MN4-10 | sundown window glare, outdoor lighting, increased noise, loss of adjoining home visual privacy, other impacts render such an implementation to be a significant, non-mitigable environmental impact against the local community. An alternative is to recognize that Phase 3 is under-specified and speculative and remove it from the project.

Environmental Checklist Comments

Project Alternatives Analysis

MN4-11 Appropriate study required. In reviewing the market survey for assisted living housing conducted by BCHD (<http://www.bchd.org/docs/hlc/2016MarketFeasibilityStudy.pdf>) I cannot determine if the report provides a view on whether or not the amount of senior housing in the area will be deficit, or, if BCHD will be displacing housing that would have otherwise been built. In the event the latter is true, then the proper No Project Alternative seems to be no BCHD project, and instead, projects developed, owned and operated by the private sector. In that case, the environmental impacts of in-fill projects such as the one at PCH and Knob Hill would be reasonable environmental comparisons.

See addendum for further specific recommended project alternative for analysis.

Purpose and Need – Project Scope and Planning Area

MN4-12 Appropriate study required. At this point, I find no support that it is necessary to the Beach Cities (now and hereafter defined as the residents of Hermosa Beach, Manhattan Beach and Redondo Beach who charter and regulate the BCHD), nor even preferred to the Beach Cities, to have BCHD build a residential care for the elderly (RCFE) project instead of allowing the private market to do it. There is no evidence presented of a potential shortfall in assisted living housing serving residents of the Beach Cities, and in fact the study has to reach into other areas (Torrance and Palos Verdes Peninsula) to find adequate market. In fact, it is my specific recollection that when the CWG discussed making the project larger so that it might be more attractive to developers, the CWG was told that a larger project reduced rents and oversaturated the expected market, suggesting that this project is marginal to the supply of assisted living units in the area. The BCHD mission is to serve the Beach Cities and those who work here.² That implies no obligation, nor authority, to build residential care for the elderly units beyond the needs of the Beach Cities specific communities. The NEED for the project is insufficient and it likely needs to be resized or subject to a public vote.

In summary, this project needs to demonstrate that it meets a need to the Beach Cities without competing with the free market. Further, the No Project Alternative needs to recognize that this is an investment for BCHD to create future revenue, and is therefore entirely a discretionary action.

Purpose and Need – Investment Income for BCHD

MN4-13 Appropriate study required. From the Community Working Group meetings and the financial analysis shown, along with comments from community members at Board meetings, it's clear that the residential and memory care units are an economic investment for the BCHD as much, or perhaps more, than they are developed to meet an unserved community need. They are not low income units. They are not limited to residents of the Beach Cities. The market appears to be adequately serving assisted living at this time and there's no evidence that it won't continue to do so. In short, whether or not environmental damage, especially any that is unavoidable and non-mitigable should be undertaken for an economic investment is very unclear. To the best of my awareness, the CWG was never shown a no project alternative that considered other options, such as reduced services, alternative investments, partition and sale of the site, etc. To be clear, financial investments by public agencies should not degrade the environment.

² Mission: To enhance community health through partnerships, programs and services for people who live and work in Hermosa, Manhattan and Redondo Beach.

Purpose and Need – Specific Explanation of Mission Creep Required

Appropriate study required. BCHD is chartered as a derivative of the South Bay Hospital District of Manhattan, Redondo and Hermosa beaches. They are taxed annually on property taxes and control the district, its scope, and activities. BCHDs mission is to serve the residents of the abovementioned Beach Cities and those who work in Redondo Beach. It's unclear when the scope expansion to out-of-Beach Cities workers occurred. In any event, a major capital project to create beds for elderly care for residents outside of the Beach Cities is beyond the scope of BCHD and cannot be used for sizing of the project.

Aesthetics

Appropriate study required. Because the of the development is at the fringe of the site, and the elevated nature of the site, the mass of the proposed development will have a significant impact on the west (Prospect Ave), south (Diamond St) and east (Torrance) single family residence communities and the north (Beryl) multi-family communities. Of the 420 residential units, it can be reasonable expected that approximately half will be on the perimeter in elevated locations that will significantly and irreversibly degrade the privacy of the surrounding residential neighborhood in a way that the original scope and mission of the South Bay Hospital District did not. The Residential Design Guideline for Beryl Heights clearly did not envision the infestation of 420 apartments into an area with approximately 350 single family homes. As such, pushing the development deeper into the available space at BCHD and removing it from the local neighborhood is one way to partially mitigate the significant impacts. There appears to be ample open space in the center of the site to increase the setbacks. See <https://www.redondo.org/civicax/filebank/blobdload.aspx?BlobID=2905>

In summary, specific aesthetic alternatives to the presented preferred case include: developing a modification to maximum height that further reduces it proportionate to the project's distance from residential areas (taller inside the site, shorter on perimeter), increasing the setbacks of the structures in all phases, removing/reducing windows that face residential areas, removing/reducing all lighted external signage, removing/reducing external lighting, removing/reducing external reflective surfaces, enclosing walls of parking structures that face residential areas, or reducing the overall size of the project. The lack of receptor simulations makes the current design deceiving based on aerials only.

Air Quality

Appropriate study required. Requires a full analysis of emissions, including commercial and demonstration cooking. Again, this project is larger than the 370 homes in the Beryl Heights neighborhood as defined by the City of Redondo Beach and its emissions are de facto significant.

Further, the construction emissions may be significant and non-mitigable to the local area if the only construction path for 10-15 years and 30,000-50,000 heavy truck trip loads plus several hundred thousand worker trips is the main BCHD entrance in the 500 block of N. Prospect Ave. If the burden can be shared with the Flagler and Beryl property via a graded ramp for the duration, the fugitive dust, PMx, asbestos, and other carcinogens may be able to be diluted into a state where they can be mitigated. Construction emissions impact mitigations include: BCHD funded air filtration systems for homes in the plume of emissions and fugitive dust, limited work hours based on air quality forecasts, hard-covered heavy haul trucks, active suppression during all excavation, demolition and loading activities, and independent on-site emissions monitoring equipment accessible in real-time by residents via the internet.

It is also unclear if the Towers Elementary receptor will be subject to construction fugitive dust, vehicle emissions, and site emissions and if it is, what mitigations are possible.

Biological Resources

MN4-21 | Appropriate study required.

Cultural Resources

MN4-22 | Appropriate study required.

Energy

MN4-23 | Appropriate study required. In addition, as a public health agency, a formal statement of the BCHD position on carbon and criteria pollutant abatement and neutrality, including life cycle construction impacts, should be developed and made a formal part of the project statement.

Geology

MN4-24 | Appropriate study required with emphasis on offsite impacts that will be created from saturation, excavation, fill, construction and the subsequent land shift impacting all downhill property and the potential for slab and stucco cracks, door frame and window shifting, and disruption of the scientifically selected seawater intrusion barrier known as the West Coast Basin Barrier Project (WCBBP) that was selected for injection and monitoring wells along Prospect Avenue through Torrance, Redondo and Hermosa Beach. This barrier prevents seawater from polluting freshwater wells that are relied up by the residents of the LA Basin.

MN4-25 | The plan for using on-site generated demolition materials to effectively create a percolation basin beneath the site is, on its face, dangerous. It is the equivalent of creating an underground lake during runoff times, and since BCHD is 30-50 feet above surrounding grade, it has short term and long term likelihood of saturating surrounding properties and increasing slide activity, such as that which naturally occurs on the south side of the site on the former Flagler alley. Any base construction plan must include removal of all demolition materials, and not plan on creation of the under-site basin.

MN4-26 | In addition, the stability of the existing structures during construction requires examination due to on-site vibration, excavation, and soil shifts. I do not know the maximum peak ground acceleration (pga) for design at the site, however, over a 15 year period, a significant event probability is significant.

Greenhouse Gas Emissions

MN4-27 | As a public health agency, a formal statement of the BCHD position on carbon and criteria pollutant abatement and neutrality, including life cycle construction impacts, should be developed and made a formal part of the project statement.

Hazards

MN4-28 | Appropriate study required that includes the potential for biohazards, medical contamination, and nuclear material from prior hospital, emergency room, and diagnostic use.

MN4-29 | Further, the hazards may be significant and non-mitigable to the local area if the only construction path for 10-15 years and 30,000-50,000 heavy truck trips plus 300,000 or more worker trips is the main BCHD entrance in the 500 block of N. Prospect Ave. If the burden can be shared with the Flagler and Beryl property via a graded ramp for the duration, the various toxic hazards may be able to be reduced to a state where they can be mitigated.

Hydrology

MN4-30

Appropriate study required with emphasis on offsite impacts from saturation and land subsequent land shift impacting all downhill property and the potential for slab and stucco cracks, door frame and window shifting, and disruption of the scientifically selected seawater intrusion barrier known as the West Coast Basin Barrier Project (WCBBP) that was selected for injection and monitoring wells along Prospect Avenue through Torrance, Redondo and Hermosa Beach. This barrier prevents seawater from polluting freshwater wells that are relied up by the residents of the LA Basin. See prior discussion of impact of percolation basin from Geology.

Land Use

MN4-31

Appropriate study required. Mandatory reconciliation with the intent of the Beryl Heights neighborhood residential design guidelines. It is not at all clear that the interpretation of P-CF or CF provides for a 420 unit residential apartment development on the site that is larger than the adjacent Beryl Heights neighborhood. The site was “zoned” for the South Bay Hospital by a vote of the people. A public vote to rezone (or in the case issue a CUP) is therefore appropriate to determine subsequent use of the site for residential housing.

Mineral Resources

Appropriate study required.

Noise and Vibration

MN4-32

Appropriate study required. The embedded estimates based on FEMA and City of LA EIR analysis of a smaller senior housing complex construction show nearly 30,000 truck trips during the proposed project, including heavy haul of excavation, debris, and hazardous waste, as well as, inbound cement, steel, cranes, and materials. Damage to adjacent resident foundations, slabs, lots, framing, stucco, and other structures is highly likely, as well as substantial construction noise and potential operating noise. Vehicle counts do not include worker traffic.

MN4-33

Further, the construction noise and vibration may be significant and non-mitigable to the local area if the only construction path for 10-15 years and 30,000 loads plus worker traffic is the main BCHD entrance in the 500 block of N. Prospect Ave. If the burden can be shared with the Flagler and Beryl property via a graded ramp for the duration, the noise and vibration may be reduced via partitioning into a state where they can be mitigated.

MN4-34

Mitigations include claims and grant processes for the local neighborhood for soundproofing homes (especially for day sleepers and the chronically ill), repairing cumulative damage from the truck traffic, cleaning due to fugitive dust caused by vibration of construction and hauling, limits on hours of construction and active noise cancellation.

Population and Housing

MN4-35

This project proposes to double the size of the Beryl Heights neighborhood area. For a decade and a half it will disrupt daily activity, traffic, day sleepers, home businesses, etc. The impacts on the surrounding housing are significant and reduction of project size or the No Project Alternative may reduce the impacts.

Public Services

MN4-36

Appropriate study required. The project and its tax exempt status as a public agency are likely to impact the revenues to schools, parks and other public facilities that would otherwise be enjoyed if the

MN4-36 cont. project were built, owned and operated by a wholly private entity. At a minimum, tax losses and other fees foregone need to be quantified and mitigated by the project.

Recreation

MN4-37 Appropriate study required. The NOP errs in its a priori speculative finding that the project will not have an adverse physical impact on the environment. I was recently made aware that according to a newspaper article <https://easyreadernews.com/redondo-beach-homelessness-resident-anger/> the 9th Circuit Court of Appeals in Martin versus the City of Boise decision, neither BCHD nor the City of Redondo Beach will be able to bar the unsheltered from camping on the public space created as part of this public project without providing adequate shelter to house all the unsheltered. BCHD as a public entity will *de facto* be an invitation for unsheltered housing as endorsed by the 9th Circuit. As a private entity has no such obligation, a similar project with exactly the same characteristics could be legally protected from becoming such a magnet. Thus, the mere creation of the public space by removing the concrete, and the public nature of BCHD, creates a non-mitigable impact for the project. Also see <https://cdn.ca9.uscourts.gov/datastore/opinions/2018/09/04/15-35845.pdf>

Transportation

MN4-38 Appropriate study by time period is required, including a full estimation of all construction loads and transport. Furthermore, the new entrance from the Flagler lot should be analyzed as a construction entrance with direct access to 190th/Anita for the DURATION of the project for all cement, heavy haul, and ordinary construction equipment to minimize the burden for emergency equipment, commuters, residents and school children dependent on Prospect.

The neighborhood cannot and will not rely on a future study and must have appropriate construction and heavy haul estimates and paths that do not burden the local neighborhood for over a decade.

MN4-39 Based on square feet of demolition and construction, this project is larger than the CenterCal project that was voted down. Simple math shows it would have required over 50,000 heavy truck trips and over 300,000 worker commuter trips. The 500-600 block of North Prospect between Diamond and Beryl cannot support that many additional vehicle trips, nor is it apparent that it can be mitigated to less than significant. As a result, the mitigation would be to exit somewhere other than onto Prospect, and/or reduce the project scope and size.

MN4-40 In terms of permanent egress and ingress, a possible mitigation is to close Flagler at Beryl (or make Flagler one-way north at Beryl) and put an egress-ingress onto Beryl. It's unclear what the precise intersection would look like, although a light would be required for left turns onto west bound Beryl.

See addendum for further traffic mitigation recommendations and map.

Utilities

MN4-41 Appropriate study required. Degradation of local power, fresh water, and sewer service is envisioned from the 400 unit apartment building complex. As part of economic justice, all costs caused by the project need to be borne by the project as a matter of equity. While EIRs are not cost sensitive, as we cannot put a price on the environment, the allocation of costs is a proper consideration and the cost causation dictates the project bear 100% of its costs.

Wildfire

No comment. Likely no impacts.

Suggested Mitigation Alternatives from Neighborhood Discussions (adopted into and included as my comments to the NOP)

-Construction Impacts on Local Neighborhoods-

Need to mitigate the disproportionate burden on the adjacent neighborhoods

Provide free/discounted Center for Health and Fitness memberships for adjacent neighborhoods in Redondo Beach and Torrance

Provide discounted assisted living charges for adjacent neighborhoods in Redondo Beach and Torrance

Provide discounted memory care charges for adjacent neighborhoods in Redondo Beach and Torrance

Provide discounted fees on all other BCHD services for adjacent neighborhoods in Redondo Beach and Torrance

-Reduce the size of the project

Construct the project more quickly and cut down on the decade long impact

Size the project explicitly to serve the beach cities only, not surrounding areas as a commercial RCFE venture by BCHD

-Move the project to another site, or multiple sites-

Spreads out impacts of both construction and operation

-Traffic-

Ban the expected 400,000 big truck and workers' vehicle trips during commute and school dropoff/pickup times (traffic estimate based on CenterCal EIR)

Require all workers to park offsite and use natural gas or electric buses to shuttle them during only off-peak times

Make a construction truck entrance to BCHD for the duration of the project at the Flagler and Beryl lot that BCHD already owns, providing direct access to 190th and the freeway

-Diesel emissions-

Require use of natural gas and electric vehicles and construction equipment like the ports

Require use of diesel emissions traps on any diesel fueled equipment

Ban the use of portable generators and other diesel fueled equipment

-Noise-

Ban construction noise outside of 9AM - 5PM (or some time)

Build protective sound walls around the construction area

Fund the soundproofing of adjacent neighborhoods like LAX did

-Dust and Dirt-

Frequent watering of dirt piles

Active watering during excavation

Project-paid house cleaning crews available for adjacent neighborhoods due to flying dirt, dust, concrete powder, and other messes

-Aesthetics (How the project looks)-

The project is on the highest ground in the area, BCHD must minimize view impacts and privacy invasions

Make the height of the project more similar to the existing neighborhood

Reduce all residence facing buildings to 2 stories on the perimeter of the development

MN4-42

Increase the setbacks from the streets and other homes to reduce noise, be better in scale, and increase privacy
Ban windows that overlook residential homes and yards to maintain existing privacy
Ban outdoor lighting that will shine into adjacent neighborhood

MN4-43
cont

-Public Services-

Despite BCHDs tax-exempt status

Make sure that the project fully funds police, fire, paramedics and other services that it might need

Make sure that the project fully funds traffic lights, road improvements, and needed traffic-related changes

Proposed Principles for Further Development and Analysis of the HLC and Provided as a Formal Comment on the Purpose and Need of the BCHD HLC submitted in the NOP

1. Increased assisted living and dementia care will be needed as the Manhattan Beach, Hermosa Beach, and Redondo Beach populations age (the “Beach Cities” of BCHD).
2. As planned, BCHD assisted living will charge full market-based, non-discounted fees for assisted living and related support.
3. The free market is currently adding those needed resources to serve local needs, such as the recent 94-unit Kensington Redondo Beach at PCH and Knob Hill. There is no explicit shortfall in services.
4. BCHD is not a required supplier of assisted living housing or dementia care in addition to the free market to meet the Beach Cities needs.
5. The project is being completed as an investment and revenue source for BCHD future operations.
6. The environment should not suffer damage caused by public agencies for projects that do not meet explicit shortfalls in public services. This is a VERY IMPORTANT premise.
7. Environmental impacts caused by BCHD due to investments and revenue sources that are not required to meet explicit shortfalls in public services should be mitigated to LESS THAN SIGNIFICANT in each and every case.
- MN4-44 8. Surrounding Torrance neighborhoods, which are not one of the Beach Cities in BCHD, along with the surrounding Redondo Beach neighborhoods will be heavily impacted by the project construction and operating burdens listed above.
9. Local neighborhoods and residents face project burdens from construction and operation that are wholly disproportionate with any benefits they are likely to receive from the project.
- MN4-45 10. Moving forward, BCHD must recognize, address and mitigate the project’s construction impacts on the local Redondo Beach and Torrance neighborhoods, including, but not limited to: traffic, noise, dust, toxic particulates, and all other CEQA criteria to LESS THAN SIGNIFICANT in each and every case.
11. Moving forward, BCHD must recognize, address and mitigate the project’s long term impacts on the local Redondo Beach and Torrance neighborhoods, including but not limited to: traffic, noise, loss of visual privacy, outdoor floodlighting, and all other CEQA criteria to LESS THAN SIGNIFICANT in each and every case.

12. Moving forward, BCHD should provide the local neighborhoods that disproportionately shoulder the burden of construction and ongoing operations of the proposed project free or subsidized services, including, but not limited to: Center for Health and Fitness memberships, reduced fee assisted living costs, reduced fee dementia care costs, and other subsidized services as provided by BCHD or in the Pavilion.

Addendum – EIR Mitigation for Construction Transportation

Specific Proposed Construction Traffic Route for Light and Heavy Vehicles

The thick black line below in the northeast corner of the map represents the recommended ingress and egress for construction equipment. It will require developing an appropriate grade and surface for heavy vehicles (common, especially in new construction development) and modification of the construction plan to leave the construction traffic pathway open and available through demolition of the 510 and 514 buildings and construction of all final phases in 2033. I have brought this up in several CWG meetings, so it should be understood to BCHD. Vehicles will need to use 190th for freeway access and as such, this reduces their total travel time and distance, minimizes engine runtime, expedites their access to the 405 or other freeways, reduces their impacts to Prospect and surrounding areas by leaving Prospect as a functional north-south artery, decreases vehicles carbon and cancerous PMx and other criteria pollutants, and partially mitigates neighborhood project impacts.



Addendum – Project Alternative

Greenspace for Beach Cities Use and Rented to Others – Supported by Peer-reviewed Research

MN4-47 I was approached by a neighbor with an idea that I am adopting as my own and submitting. It is a project alternative. According to recent journal studies, “Residential green space in childhood is associated with lower risk of psychiatric disorders from adolescence into adulthood.”³ The peer-reviewed study and its 53 citations demonstrate the effectiveness of creating a green space program for youth. The suggested alternative project is the development of a garden park on the maximum acreage possible at BCHD, without any further development, and making the garden park accessible on a regular basis only to Beach Cities residents and workers in Beach Cities. Non-residents could purchase annual access passes for revenue generation. The park would be available for special events, such as meetings, weddings, etc. and would generate further revenue. Programs for youth could be developed, not unlike Bluezones where BCHD pays some form of continued fees, and instead the program could be syndicated. The monetized mental health benefits, and avoided disbenefits, along with other revenues could fund additional BCHD, and additional programs would only be available to the extent that they are funded. This is a project alternative intended to increase mental health with a side benefit of revenue generation.

³ <https://www.pnas.org/content/116/11/5188>

Ramos, Ryan

From: EIR <eir@bchd.org>
Sent: Friday, August 2, 2019 1:55 PM
To: Meisinger, Nick
Subject: Fw: Comments for EIR NOP and BCHD BoD

From: Mark Nelson (Home Gmail) <menelson@gmail.com>
Sent: Monday, July 29, 2019 4:52 PM
To: EIR <eir@bchd.org>; HLCInfo <HLCInfo@bchd.org>
Subject: Comments for EIR NOP and BCHD BoD

Mark Nelson
menelson@gmail.com
BCHD CWG Member

July 29, 2019

HLCInfo@bchd.org
EIR@bchd.org

SUBJECT: Supplemental Comments to EIR and Supplemental Comment to the BCHD BoD

The following are submitted as my own for the process of the EIR NOP and for the information of the BCHD Board of Directors, although some were provided by me to residents that round the process to be too complex or did not have adequate time or availability to make comments.

1. Unlike a fire station or police station or power plant, this EIR is for a non-urgent, wholly discretionary project. In the absence of this project, the private sector will provide sufficient, market-rent RCFE.

MN5-1 The comment period for the NOP should be extended and the draft, proposed calendar for processing should be changed such that the draft FEIR comment period does not begin until mid to late January 2020 at earliest to avoid another conflict with school schedules and vacations, such as we just experienced with the NOP comments. Having the draft FEIR comment period beginning prior to all Beach Cities schools being back in session from winter holiday break is not acceptable.

MN5-2 2. Assuming the financial estimates are correct in the Daily Breeze article and this is a \$500M property project, what amount of property tax will be paid by the project, since it is serving a competitive commercial process and in theory should not be wholly tax exempt, especially as a "flip" investment transaction by a commercial developer? I assume that it will be paying full property tax rates at least on all the RCFE property? If not, please advise how the City of Redondo Beach will make up the \$5M annual shortfall in compensatory property tax revenues from the project not paying property taxes.

MN5-3 3. Comment providers have let me know that they are NOT receiving receipts when they comment. Receipts should be added to the EIR and HLCinfo email addresses to complete the process.

MN5-4 4. Please provide details on the process that selected RCFE over all other potential health related services as the "Purpose" of the project. Please advise in the Purpose and Need discussion.

MN5-5 5. Because RCFE is a high capital project that is only tangentially related to health care and does not require the intervention of the public sector, as the private sector can provide RCFE services at market prices also, what other health related services were considered? Current issues that could raise significant revenues from lesser capital outlay and environmental damage include: child and adult internet addiction in-patient and out-patient treatment and other cutting-edge mental health treatments. Please advise in the Purpose and Need discussion.

6. As quoted in the Daily Breeze, the BCHD has a mission to reduce stress. What stress reducing projects/programs were considered when developing the Purpose and Need for the current EIR? Please advise in the Purpose and Need discussion.

Ramos, Ryan

From: EIR <eir@bchd.org>
Sent: Friday, August 2, 2019 1:55 PM
To: Meisinger, Nick
Subject: Fw: Comment on NOP EIR Project Alternatives

From: Mark Nelson (Home Gmail) <menelson@gmail.com>
Sent: Monday, July 29, 2019 4:55 PM
To: HLInfo <HLInfo@bchd.org>; EIR <eir@bchd.org>
Subject: Comment on NOP EIR Project Alternatives

I just received the following suggestion and I am adopting and providing it for analysis and discussion.

MN6-1 | Has BCHD considered developing a health-focused, high tech incubator with either rents and/or equity shares in the tenants? This would not require significant renovation since the use would not be residential. Both 510 and 514 could be suitable buildings. Please analyze and comment in the EIR as a project alternative.

Catherine Bem

From: Nomen Nescio <nobody@dizum.com>
Sent: Sunday, July 28, 2019 10:40 PM
To: EIR
Subject: BCHD Project Comments

Johnson Family
501 Maria
Redondo Beach, Calif 90277

To whom it may concern:

This is summer. We are vacationing. Making comments are very hard.

BCHD president Bakely says that BCHD just wants to make money. Rehabilitation houses for drugs and alcohol, and halfway houses for recent released criminals make a lot of money. Prospect already has both halfway houses and rehab houses, so why not just buy all the houses on Diamond to the east of Prospect, and all the houses on in the 500 and 600 blocks of North Prospect and make more health-related halfway houses and rehab houses? It would make at least \$10,000 per house per month, for 50 houses, so that's \$6M a year without much new construction. Masada Corporation already makes a fortune with them, so BCHD could subcontract out operation of the houses.

The owners of the existing houses would need to be compensated at market price of the house, plus the cost of any Prop 13 tax increases for the next 20 years, plus some sort of a length of residence premium for their experiences and memories, such as \$10,000 per year as a homeowner or resident. For example, a \$1M home with a \$500K basis and a 20 year homeowner would get \$1M + \$5000/yr Prop 13 increase * 20 years + 20 years * \$10,000 = \$1.3M That's the LEAST that BCHD can do for the local homeowners and it will make a lot of money for the non-bashful president Bakely.

I guess this is an alternative project to consider in the EIR that would substitute for the huge project that is planned. I'm looking forward to BCHD analysis, because I think this is even more valuable than I've estimated, with either 4 or 8 tenants per home at a minimum of \$8000 a month to a maximum of \$80,000 per house per month. Please seriously consider this idea to pay back society, the homeowners, and make great returns for the BCHD.

Halfway houses charge \$2000 per person per month

<https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.therecoveryvillage.com%2ftreatment-program%2faftercare%2ffaq%2fwhat-is-a-halfway-house%2f&c=E,1,hV6TGx6rxB0ylo7lItcvfQOGCfoMJexL5xYNfb5Pj0Peer-yu79ZdS4BwSdhVrmTlzJJTh6ZNVJQNfqN18s0m47BmdHKzGYOBXqN7IHspA,,&typo=1>

Drug and alcohol rehabilitation houses charge \$5000-10000 per person per month

https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.addictioncenter.com%2frehab-questions%2fcost-of-drug-and-alcohol-treatment&c=E,1,3i1I1x6HJuVu5K8hzTJVqwbXC_Ga1rNmX9WsOdNGTfgzJKLbfi1FvZuUbgZjTgKQMgihNvh9J8bqqgbsBfGU DgYTF3NL5wRYOlweZUx0ecQIXswZqUEA&typo=1

Ramos, Ryan

From: EIR <eir@bchd.org>
Sent: Friday, August 2, 2019 1:33 PM
To: Meisinger, Nick
Subject: Fw:

From: peggy north <peggy58north@gmail.com>
Sent: Sunday, July 28, 2019 11:44 AM
To: EIR <eir@bchd.org>
Subject:

Regarding the Inviromental impact the project would have on the residents just east of the project. We live where Flagler ends at Towers St. We already have so much traffic thru our tract with parents dropping off and picking their kids from school. We have a problem backing out of our driveway any time near 9:am and 3:pm..

This would not be a good.

Peggy North

PN-1

Catherine Bem

From: Holly Osborne <nredschoo@yahoo.com>
Sent: Monday, July 29, 2019 3:14 PM
To: EIR
Subject: Re: Questions for BCHD on EIR report

I meant to say Monday July 29, below.

On Monday, July 29, 2019 02:59:37 PM PDT, Holly Osborne <nredschoo@yahoo.com> wrote:

Dear BCHD: please give consideration to the following comments. (These are submitted at 3:00 PM Monday July 27)

The BCHD has said they plan to build 360 assisted living units (in addition to the existing 60 unit memory care capacity, to be relocated.)

The BCHDs mission is to serve the needs of the entire Beach Cities Health District Population, not just the assisted living.

If the BCHD built both "regular" units and "assisted living units", it could serve the needs of more of the population.

What about **200** assisted living units, and **100 regular units**? (By "regular" I do not mean "independent" assisted living units, I mean **regular** apartments.)

However, at least half (i.e. 50) of the "regular" apartments should be built of a **very modest size**, in order to make them budget friendly. A smaller size apartment might be attractive to retired or near retired folks on limited income and they would be near to all the medical facilities of the assisted living people, so that they could walk to appointments. A grocery store is nearby, so they could walk to that, too. A walkable community would be very environmentally friendly and also promote healthy living by keeping folks active. .

Older people in the regular apartments would be near to assisted living units, should they ever have to move.

Smaller size apartments could also serve the needs of young people, just starting out.

Make sure the parking is adequate.

And since the Beach cities residents have paid the taxes on this place, then preference should be given to Beach cities residents who have been here at least 6 months (or some other set time).

Holly Osborne

Ramos, Ryan

From: EIR <eir@bchd.org>
Sent: Friday, August 2, 2019 1:35 PM
To: Meisinger, Nick
Subject: Fw: Environmental Concerns for Beach Cities Health District

From: Stephanie Pao <stephiepao@gmail.com>
Sent: Sunday, July 28, 2019 8:02 PM
To: EIR <eir@bchd.org>
Cc: HLCInfo <HLCInfo@bchd.org>
Subject: Environmental Concerns for Beach Cities Health District

Hello,

I'm a new homeowner whose home happens to be directly across the street from this large project. As a millennial who graduated into the great recession, it has been difficult to both make a living and save as the cost of housing continues to rise. However, I was able to do it and purchased a condo in Redondo after months of hectic bidding and negotiations, after losing time and time again to people with more cash or down payments.

SP-1 Now, less than two years into my time at my condo I'm learning that it will not be a pleasant place to live and I will probably be listening to construction noise, environmental debris and increased traffic for decades. Making the home I've worked so hard for nearly unlivable. I do not want to put my health at risk for decades and do not want the burden of dealing with construction for decades.

I beg you to reconsider this project.

Kind regards,
Stephanie Pao

Ramos, Ryan

From: EIR <eir@bchd.org>
Sent: Thursday, July 25, 2019 10:37 PM
To: Meisinger, Nick
Subject: Fw: Beach Cities Health District Project

From: Hamant and Robin Patel <hamrobpatel@gmail.com>
Sent: Wednesday, July 24, 2019 5:47 PM
To: EIR <eir@bchd.org>
Subject: Beach Cities Health District Project

Hi,

I have a couple of comments regarding the Beach Cities Health District Project:

Corner of Flagler and Beryl

RP-1 | Currently there is a 4 way stop on the corner of Flagler and Beryl. If there is going to be an entrance/exit on Flagler, consideration should be made to whether there should be a signal at this location (and possibly at 190th and Flagler). Currently, there is always confusion at the corner due to cars turning right (from all directions)...cars turn right without any consideration of "right away" traffic. An increase in traffic flow would increase the confusion.

Another thought would be to make the Flagler entrance a right turn only from Beryl and the exit a left turn only using the design to make it impossible to make illegal turns onto/from Flagler.

Corner of Flagler and Towers

RP-2 | Cars tend to speed around the corner and roll through the stop sign at Mildred and Towers. Redondo Union High School students cut through the "alley" on Flagler behind BCHD and cross Towers at the corner where there is no crosswalk. In addition the proposed bike path is projected to cross the same corner. Consideration should be made to make the corner safe (I don't think a "median" solves the problem). A stop sign would slow traffic although, cars tend to roll through all the stop signs on the street.

There is a slight downhill on Towers and cars pick up speed heading into the "blind" curve at Redbeam. There have been several accidents (including a fatality) over the years. Towers Elementary school has an exit on Towers between Mildred and Redbeam, so there are many children and parents walking across the street before and after school.

Construction

It is my understanding that this project will span 15 years.

- RP-3 |
- Will there be on site parking for construction workers?...otherwise their cars will be parked in the surrounding areas adding congestion to the residential area.

RP-3
cont

- Will construction trucks be required to come in off of Prospect and not "cut through" the residential area behind BCHD where the Towers Elementary school back entrance/exit is located?

RP-4

- Will construction be limited to the hours between 8 am - 5 pm, M-F...or will residents be subject to the noise and disruption before/after for 15 years? Also consideration for the school start and stop time should be included to minimize risk to students and parents with the additional traffic.

RP-5

- Will the construction site be designed to limit the pollution (dust et al) that will blow from the site to the neighboring areas that sit below (both in Torrance and Redondo Beach) since BCHD sits on a hill above the neighboring areas.

RP-6

- Will construction site have a plan in place to check that trash from the site will not find it's way (either blown or thrown) into the neighboring areas? Is there a plan to prevent water, mud, debri, etc from the site will not flow into the streets or worse, into the yards of the homes that back up to site?
- Will BCHD do anything for the neighboring residents who are going to be inconvenience with the construction for years?

RP-7

- Will the construction impact any utilities for the neighboring residential areas?

RP-8

I am assuming that the environmental study is reviewing that the location will be stable enough to hold a facility of this size, that the depth at which the construction will be done will not degrade the stability of the surrounding areas, the infrastructure (parking and people) will be sufficient for a facility of this size, and that the landscaping will be designed to prevent future water run-off into the lower areas.

Thank you.
Robin Patel

Ramos, Ryan

From: EIR <eir@bchd.org>
Sent: Friday, August 2, 2019 1:30 PM
To: Meisinger, Nick
Subject: Fw: Beach Cities Health District Project

From: Aileen Pavlin <arpavlin@gmail.com>
Sent: Saturday, July 27, 2019 9:48 AM
To: EIR <eir@bchd.org>
Cc: OMartinez@torranceca.gov <OMartinez@torranceca.gov>
Subject: Beach Cities Health District Project

Mr. Meisinger,

I am sending this email to document my full support of the concerns and the solutions that Torrance residents have sent to you over last few months. We are very fortunate to have so many individuals who have articulated these issues to your committee. As an original home owner on Mildred Ave, I can clearly see the impact this will have on the traffic, health and safety of this community.

Again, I am in complete agreement with all these concerns that have been sent to you and do not feel they need to be listed again. Please take these issues seriously before moving forward with this project!!

Thank you for time,

Aileen Pavlin
19515 Mildred Ave.
Torrance

--

Joyce Peim
20002 Tomlee Avenue
Torrance, CA 90503
jpeim@aol.com

July 25, 2019

Mr. Nick Meisinger, Environmental Planner (via email at: EIR@bchd.org)
Wood Environmental & Infrastructure, Inc.
9210 Sky Park Court, Suite 200
San Diego, CA 92123

Dear Mr. Meisinger:

Please accept these comments as part of the public review period for the NOP related to the BCHD Healthy Living Campus Master Plan.

- (1) The Health and Safety of School Children Must Not Be Put at Risk;
West High School Must Be Included in the Impact Assessment

(a) Airborne Toxins and Other Particulate

The elevation of the site and its proximity to the ocean and exposure to the effects of ocean breezes must be properly and thoroughly assessed to ensure that the children attending schools near the site are not exposed to any increased risks to their health. This requires inclusion of all schools in the vicinity, and correct measurements as to the elevation of the site.

□□-1

The NOP states that the current facilities to be demolished contain asbestos and lead-paint, and that Tower Elementary School is a mere 350 feet from the site. (NOP, p. 47.) Of the three schools noted in the NOP, Tower Elementary, which is in Torrance, is the closest school and, along with Beryl Heights Elementary School which is 900 feet from the site, provides education to the youngest students. The NOP references Redondo Union High as being located 0.30 miles to the southwest of the site, but omits West High School, which is just over one mile southeast from the site as measured from the site to Henrietta Street and Del Amo Blvd., which is the western side of West High School.

□□-□

The NOP provides conflicting measurements for the elevation of the site. First it states the elevations is 166 feet above MSL at its highest point, 146 feet above MSL at the southern point, 30 feet above MSL at Flagler and 15 feet above MSL at Beryl. (NOP, p. 7.) However, in relation to the effect of a tsunami on pollutants, the NOP states the site is 97 feet above MSL and within one mile of the ocean. (NOP, p. 51.)

□□-□

While of particular concern for school children, the adverse impact of airborne particulate affects teens, adults and seniors living in the nearby areas, including Torrance.

□□-□

(b) Increased Traffic/Lane Closures

The NOP acknowledges the significant impact as to the movement and access to emergency service providers in Redondo Beach. (NOP, p. 61.) The NOP ignores the impact on Tower Elementary School in Torrance, despite the fact that the demolition and construction involves Flagler Lane, (NOP, p. 61,) which is wholly within Torrance, is very close to Tower Elementary School, and is one of only two access routes into West Torrance.

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(2) Interference with Residential Single Family Homes

The north side, west side, and parts of the southern side, of the site, are in Redondo Beach; the eastern and southern sides are in Torrance. The NOP turns a blind eye to the secluded, residential single-family homes immediately next to the site in Torrance, and those to the west and south of the site in both Redondo Beach and Torrance, when it states the Project is located in a "highly urbanized area of Redondo Beach." (NOP, p. 29.) To the contrary, the area is "highly suburbanized," and the rights of quiet enjoyment of the homeowners in those areas will be dramatically affected by the demolition, construction and continuing presence of the Project.

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To be proper and adequate the assessment must be based on accurate characteristics of the areas surrounding the site.

(3) Sunlight

The NOP does not address the impact on available natural light to the surrounding areas, and shadows that will be cast from the Project, including demolition, construction and after completion.

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(4) Unnatural Light

The NOP states new sources of unnatural light and glare have a potentially significant impact. (NOP, p. 28.) This assessment requires accurate elevation measurements, which currently are in conflict as stated above, and must include the residential parts of Torrance that are immediately adjacent to, and directly below, these unnatural lights, particularly with the planned housing units being a 24-hour presence.

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Mr. Nick Meisinger, Environmental Planner
July 25, 2019
Page Three

(5) Cell Tower/Signal Interference

The NOP does not address potential interference with cell towers and signal available in the surrounding areas.

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Thank you for your time and consideration of these matters.

Very truly yours,



Joyce Peim
20002 Tomlee Avenue
Torrance, CA 90503
jpeim@aol.com

Martinez, Oscar

From: Joyce Peim <jpeim@aol.com>
Sent: Friday, July 26, 2019 5:25 PM
To: Martinez, Oscar
Subject: Fwd: BCHD -Impact on Torrance Children, Public Schools and Homeowners
Attachments: BCHD Healthy Living Campus Public Comments.pdf

Categories: Red Category

WARNING: External e-mail

Please verify sender before opening attachments or clicking on links.

Dear Mr. Martinez: I understand you are our point of contact, so I am forwarding to you the public comments I previously sent to Mayor Furey and the City Council Members. Thank you so much for your time and consideration of this very serious issue. Sincerely, Joyce Peim

-----Original Message-----

From: Joyce Peim <jpeim@aol.com>
To: PFurey <PFurey@TorranceCA.Gov>; GChen <GChen@TorranceCA.gov>; TGoodrich <TGoodrich@TorranceCA.Gov>; MGriffiths <MGriffiths@TorranceCA.Gov>; MHerring <MHerring@TorranceCA.Gov>; Mattucci <Mattucci@TorranceCA.Gov>; GRizzo <GRizzo@TorranceCA.Gov>; PSullivan <PSullivan@TorranceCA.gov>
Sent: Thu, Jul 25, 2019 7:49 pm
Subject: BCHD Healthy Living Campus Master Plan Impact on Torrance Children, Public Schools and Homeowners

Dear Mayor Furey and City Council Members: The proposed BCHD Project is immediately adjacent to Tomlee Avenue, where my husband and I own our single-family home. Significantly, Tower Elementary School is within 350 feet of the site. The elevation of the site, and its proximity to the ocean and ocean breezes, indicates the effects of the demolition and construction will impact the western, southern and eastern parts of Torrance. I respectfully urge you to become involved in ensuring that there will be no adverse impact to, and/or increased risks to, the health and safety of our children, seniors, residents and homeowners, as a result of this project being planned by the BCHD. Toward that end I am attaching the comments I provided to the Environmental Planner overseeing the project. Thank you for your time and consideration. Very truly yours, Joyce Peim 20002 Tomlee Avenue Torrance

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Robert and Arlene Pinzler
1801 Stanford Avenue
Redondo Beach, CA 90278
bpinzl@gmail.com
apinz@roadrunner.com

July 24, 2019

Nick Meisinger,
Environmental Planner
Wood Environment & Infrastructure Solutions, Inc.
9210 Sky Park Court, Suite 200
San Diego, CA 92123

VIA EMAIL

RE: Comments on the Beach Cities Health District's proposed Health Living Campus Master Plan Notice of Preparation

Dear Mr. Meisinger:

Please consider the following comments as you design the Draft EIR for this project:

- 1) The plans for the proposed Healthy Living Campus are entirely conceptual at this point, according to Beach Cities Health District (BCHD) officials. This makes it very difficult to determine with any accuracy the full range of potential environmental impacts.

For example, according to BCHD officials, it is possible that the Health and Wellness Pavilion currently in Phase II of the proposed plan may never be built due to potential financial issues. Aside from the fact that this feature has been presented by BCHD officials as a key element in its case for the Healthy Living Campus as a place where the health and well-being of the entire community would be promoted, this prospect poses serious issues for the current EIR process. We strongly suggest that the Draft EIR process be postponed until the BCHD is prepared to resubmit a revised project plan that it can commit in much greater detail and with far greater certainty.

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- 2) Short of a revised project and delayed EIR process as described in item 1 above, the BCHD should commit to breaking up the EIR process for this project into three separate reviews. The proposed Healthy Living Campus project currently has a three-phase building plan, each phase lasting five years for a total of fifteen years. Since anticipating potential environmental impacts that stretch that far into the future is a task best left to clairvoyants, the Draft EIR should include a commitment by the BCHD to providing an updated EIR for each of the succeeding phases in order to properly reflect reality on the ground.

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(Continued)

3) Especially given the lack of any firm commitment from the BCHD on the maximum number of people who would reside at the Health Living Campus, the Draft EIR should rest all of its conclusions on potential environmental impacts on the maximum number of people that would be allowed to reside there under current law, and on the number of staff members it would take to ensure the facility and all its residents are well served.

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4) Along with gathering sufficient data on the increased traffic and noise that would potentially be generated by the Healthy Living Campus over current conditions, the Draft EIR needs to fully account for the expected increased call for paramedic, ambulance and hospital services in Redondo Beach and the surrounding cities. This would include: a.) potential changes in emergency response times; b.) the impacts of an expected increased call for paramedic, ambulance and hospital services in Redondo Beach and all the other South Bay cities; and c.) the impact on county hospitals that would be expected to provide back-up whenever hospitals closer to the Campus are over-extended.

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In the case of Redondo Beach, paramedics do not transport patients to a hospital. This means that each call for service that results in a transfer to a hospital involves two separate vehicles trips. All other South Bay cities should be asked to provide information on their current emergency responder practices, and this data should be included in the Draft EIR's analysis of the impacts on emergency services.

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Thank you for your consideration.

Sincerely,

Robert and Arlene Pinzler

Ellie Preston Reed
5601 Towers
Torrance, CA 90503

Attention:

Mr. Nick Meisinger, NEPA/CEQA
Project Manager

Dear Mr. Meisinger:

I am an original owner residing in the Pacific South Bay community since 1969. I have seen a lot of changes in our neighborhood; some good and some clearly not so good. This proposed project is one of the "not so good"! With that in mind I am providing the following comments that should be included in the Environmental Impact Report to accurately assess the significant impacts from the Project as proposed:

TRAFFIC

My foremost concern has always been the traffic. The cut through traffic coming from Del Amo and from Beryl/Flagler has increased significantly in the last 10 years. The type of vehicles driving through our streets also concerns me. I see school buses that are not Torrance buses, tow trucks that are not here to tow a vehicle, cement trucks going to a project not within our neighborhood. I know they are cutting through because I live at the corner of Redbeam and Towers and can see them making a right turn to proceed to Beryl. None of the cut through drivers observe the speed limits. They cut over the center line going South and north around a blind corner (Redbeam/Towers). Having a 10% grade coming downhill south from Flagler to make that blind curve makes the turn even more dangerous.

We have a school gated entrance off Towers. When children are being dropped off by their parents, the traffic congestion is even worse; which makes dangerous conditions for the children.

This traffic will get much worse with the projected BCHD project. This is just unacceptable. Flagler should be closed to through traffic.

The EIR must assess this impact on the Torrance neighborhoods east of the proposed Project. There should be a traffic study in these neighborhoods that include physical traffic counters.

HEALTH

Another concern is the dust and dirt coming from the project. We have many elderly adults and children with either COPD or Asthma. To think that they will have to worry about this affecting their health for up to 15 years is just inexcusable!

BCHD needs to review their plans and find ways to adjust their project. The scope of the EIR should be expanded to include an assessment of the need to burden the health of the surrounding neighborhoods in both Redondo Beach and Torrance to benefit the Beach Cities as a whole. The assessment should include a determination in this case that the ends justify the means.

Thank you for your consideration,
Ellie Preston Reed

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Lamb, Kaylan

From: EIR <eir@bchd.org>
Sent: Thursday, July 25, 2019 10:23 PM
To: Meisinger, Nick
Subject: Fw: my submission regarding BCHD project

From: srfmom@aol.com <srfmom@aol.com>
Sent: Tuesday, July 23, 2019 3:57 PM
To: EIR <eir@bchd.org>
Subject: my submission regarding BCHD project

First of all, why was our neighborhood, which would be adversely effected, the last to know. Just because the city of Redondo Beach doesnt think it would effect our neighborhood they can just propose this monstrosity and think we are not going to say anything!!!!

First of all the length of this project is very detrimental to all concerned in the area besides our neighborhood. The Towers elementary school is directly downwind from this project and that dust and noise will greatly effect the children attending that school I live on Mildred Avenue and this would effect my health and quality of life I paid a pretty penny to live in this neighborhood and have terrible allergies and the thought of the dust for 15 years is not gonna work for me. The traffic if you close off Flager will be a nightmare leaving only redbeam which is also a nightmare to leave the neighborhood onto Del Amo due to REDONDO's high school and junior high and this project would just make matters 100 times worse.

I vote definitely NO and No to this 15 year project. There has to be another alternative than disrupting the lives and endangering a whole neighborhood for Redondo's benefit.

Sheri and Rick Pruden
19915 Mildred Avenue
Torrance, ca 90503

Lamb, Kaylan

From: EIR <eir@bchd.org>
Sent: Thursday, July 25, 2019 10:25 PM
To: Meisinger, Nick
Subject: Fw: Beach Cities Health District project

From: R. Quan <rq23@yahoo.com>
Sent: Tuesday, July 23, 2019 7:00 PM
To: EIR <eir@bchd.org>
Subject: Beach Cities Health District project

July 24, 2019

Nick Meisinger
Environmental Planner
Wood Environment & Infrastructure Solutions, Inc.
9210 Sky Park Court, Suite 200
San Diego, CA 92123

Dear Mr. Meisinger,

We are writing to you to express our concern with the proposed Beach Cities Health District project.

We live on Tomlee Ave. in Torrance which abuts the site of the project – the site is literally in our backyard! So imagine the concern we have for the amount of noise and construction dust that will be wafting into our house on a daily basis for the next 15 years if this project comes to fruition. This is in addition to the literal shadow a multi-story building would cast over our house and neighborhood, decreasing both our quality of life and our property values. □□-1

Further, the project calls for a multi-level parking structure on the corner of Flagler Lane and Beryl St, with an exit from the structure feeding directly into Flagler Lane. Flagler Lane is one of the few entrances to access our housing tract, so an increase in traffic into what is truly a residential street would create daily traffic nightmares getting into and out of our tract. Not to mention the increased pollution that would impact our family and others in the neighborhood, as well as the young students at Towers Elementary School which is only yards away from the proposed structure. □□-□

We strongly urge you to reconsider the scope of this project. The area surrounding the footprint of this development is predominantly residential, and a commercial project at the scale with which this one is proposed has no place in this neighborhood. □□-□

Thank you for your consideration.

Randy & Pamela Quan
20011 Tomlee Ave.
Torrance, CA 90503

July 27, 2019

Nick Meisinger, Environmental Planner
Wood Environmental & Infrastructure Solutions, Inc.
9210 Sky Park Court, Suite 200
San Diego, CA 92123

Re: Beach Cities Health District Healthy Living Campus Master Plan

Dear Mr. Meisinger, and anyone else this may pertain to,

□□-1 I've recently been made aware of BCHD's proposal to extensively develop/build/restructure on their campus located on Prospect and involving the empty lot on Beryl and Flagler. To say this concerns me is an understatement. The sheer magnitude of the proposal, with 3 phases spanning 15 years, will cause a considerable, if not, intolerable, amount of congestion and pollution in that area that will not only be present during the interminable construction period, but also from that point forward, as the proposed four to five hundred plus assisted living residences will most certainly create increased congestion from the families of those residents along with the enormous staff needed to maintain those residences.

□□-□ The amount of demolition involved in the proposal is most certain to bring all sorts of debris, chemicals and hazards, known and as yet unknown, to the surrounding neighborhood, not to mention the two schools nearby. It is not acceptable to jeopardize the health of those residents and children attending those schools.

□□-□ The environmental impact report stated numerous categories in which there is potential for significant impact, including spewing hazardous emissions as a by-product of the construction, as well as degrading water quality, increasing traffic congestion and having the strong potential for adverse environmental effects on human beings. Neither one of those by itself is acceptable, let alone all of them.

□□-□ The proposed subterranean parking entrance on Flagler is absurd as Flagler is a small street not meant to be used as an entrance to a huge parking structure. The significant increase in the volume of cars traversing through there will create bottlenecks at a small intersection that already sees its fair share of traffic congestion during morning and afternoon rush hours. The bike lane serves little to no purpose and I would argue may even increase congestion as it passes right in front of the parking structure entrance. Flagler needs to be closed off where it meets Towers in order for there to be any proposed parking or vehicular entrance/exit point near that intersection.

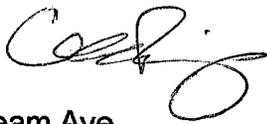
□□-□ The residential care units will be built all the way to the edge of the campus which abuts Flagler lane and the bike path behind Tomlee. This will decrease the amount of sunlight that the adjacent streets receive and negatively impact the vista of this neighborhood. Again, this is not an area meant for that sort of a building and we do not appreciate having a behemoth of a building looming over where we live.

□□-□ The preliminary findings from the EIR indicated several important categories (such as air quality, water quality, hazardous emissions, cumulative negative effects, noise levels and

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aesthetics) that can be potentially significantly affected by this proposed project. I would like to know what sort of emissions and particles will be in the air during the construction period (and after) and what the effects of those are on humans, in particular children with developing bodies as well as in elderly people and in people with breathing/health issues such as asthma or COPD. There needs to also be an extensive study on how the increase in traffic will affect all the surrounding neighborhoods, especially with such a significant increase in construction vehicles and workers and then subsequently the significant increase in employees and residents at the new campus. There should also be analysis of the impediment to natural lighting and views to the immediate surrounding neighborhood created by this project.

□□-□
In short, this proposal by BCHD will have a great negative impact on the health and wellness of those nearby and in the surrounding vicinity by polluting the air we breathe, creating significant traffic congestion, causing noise pollution and deteriorating the existing aesthetics of the area. I would like to know in detail how this project can overcome those hurdles, or greatly minimize them. Otherwise I kindly suggest that this proposal be significantly scaled down in scope.

Sincerely,



Cecilia Raju
19915 Redbeam Ave.
Torrance, 90503

July 27, 2019

Nick Meisinger, Environmental Planner
Wood Environmental & Infrastructure Solutions, Inc.
9210 Sky Park Court, Suite 200
San Diego, CA 92123

Re: Beach Cities Health District Healthy Living Campus Master Plan

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The amount of demolition involved in the proposal is most certain to bring all sorts of debris, chemicals and hazards, known and as yet unknown, to the surrounding neighborhood, not to mention the two schools nearby. It is not acceptable to jeopardize the health of those residents and children attending those schools.

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The residential care units will be built all the way to the edge of the campus which abuts Flagler lane and the bike path behind Tomlee. This will decrease the amount of sunlight that the adjacent streets receive and negatively impact the vista of this neighborhood. Again, this is not an area meant for that sort of a building and we do not appreciate having a behemoth of a building looming over where we live.

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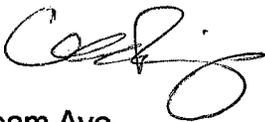
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In short, this proposal by BCHD will have a great negative impact on the health and wellness of those nearby and in the surrounding vicinity by polluting the air we breathe, creating significant traffic congestion, causing noise pollution and deteriorating the existing aesthetics of the area. I would like to know in detail how this project can overcome those hurdles, or greatly minimize them. Otherwise I kindly suggest that this proposal be significantly scaled down in scope.

□□-□

Sincerely,



Cecilia Raju
19915 Redbeam Ave.
Torrance, 90503

Mr. Vinay Raju
19915 Redbeam Ave.
Torrance, CA 90503

July 27, 2019

Mr. Nick Meisinger, Environmental Planner
Wood Environmental & Infrastructure, Inc.
9210 Sky Part Court, Suite 200
San Diego, CA 92123
EIR@bchd.org

Re: Beach Cities Health District (BCHD) Healthy Living Campus Master Plan

Dear Environmental Planner Nick Meisinger,

I read the Notice of Preparation (NOP) dated June 27, issued by Beach Cities Health District (BCHD) regarding the Environmental Impact Report (EIR) that is being prepared, and would like to comment on it here. BCHD is supposed to stand for health, yet this proposed 15-year BCHD Healthy Living Campus Master Plan (Project) would appear to potentially cause significant negative health impacts to the local community. BCHD proposes some steps to mitigate these impacts, but the mitigation steps sound like lip service, as opposed to actual ideas which could realistically lessen the numerous potential impacts outlined in the NOP. This concerns me a great deal, especially as a resident and father of two elementary school children whose entire childhood would be impacted by this project.

The table below summarizes the potential impacts described in the NOP. All quotes are taken directly from the NOP. Looking at this, you can see that the vast majority of categories show potentially significant impacts. The ones that are especially important to me are: Air Quality, Hazardous Materials, Water Quality, Noise, Population and Housing, Public Services, and Utilities and Service Systems. These categories affect the health and well being of my family and the local community. The NOP indicates that the Project may have a Potentially Significant Impact on all of these most important categories. Note that I added boldness to some text of the excerpt to help readers find key issues.

Category	Level of Impact	Excerpt from NOP
I. AESTHETICS	Potentially Significant Impact	“substantial adverse effect on a scenic vista” “substantially degrade the existing visual character or quality of public views of the site and its surroundings” “Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area”
II. AGRICULTURE AND FORESTRY RESOURCES	No impact	“Because there is no farmland on-site or in the immediate vicinity of the Project site, the proposed Project would not cause direct or indirect impacts...”

Category	Level of Impact	Excerpt from NOP
III. AIR QUALITY	Potentially Significant Impact	<p>“Project would generate criteria air pollutant emissions [National Ambient Air Quality Standards (NAAQS) for ozone (O3), lead (Pb), and fine particulate matter less than 2.5 microns in diameter (PM2.5), . . . fine particulate matter less than 10 microns in diameter (PM10), carbon monoxide (CO), and nitrogen dioxide (NO2)] during each phase of the three construction phases.”</p> <p>“The generation of these compounds during and after construction could exceed the federal and state standards for such emissions”</p> <p>“Expose sensitive receptors to substantial pollutant concentrations” . . . “Sensitive receptors are defined as locations where uses or activities result in increased exposure of persons more sensitive to the unhealthful effects of emissions (e.g., children and elderly residences, etc.)”</p>
IV. BIOLOGICAL RESOURCES	No impact / Less than significant	<p>“Implementation of the proposed Project would likely result in removal and or relocation of approximately 120 trees, . . . These trees may provide nesting habitat or other temporary stopover habitat for migratory birds”</p>
V. CULTURAL RESOURCES AND TRIBAL CULTURAL RESOURCES	Potentially Significant Impact	<p>“The original . . . structure is over 50 years old, which is the threshold for a built resource to be eligible for listing on the California Register of Historical Resources (CRHR). Therefore . . . will incorporate the historical architectural assessment of the building and assess the extent to which the original architecture has been compromised to the extent that it does or does not retain the character associated with the 1960’s style and form.”</p>
VI. ENERGY	Potentially Significant Impact	<p>“the inefficient use of energy may be potentially significant under the proposed Project”</p>
VII. GEOLOGY AND SOILS	Potentially Significant Impact	<p>“Given the regional seismicity, impacts are considered potentially significant”</p> <p>“Construction activities including demolition of existing surface parking lots, excavation of approximately 65,000 cy of soil for the construction of a new subterranean parking garage, trenching for utility relocation, etc. would have the potential to result in erosion and/or topsoil loss.”</p> <p>“Soils that are potentially unstable can fail when a new load is placed atop the soil, such as the construction of a new building.” . . . “Such movement</p>

Category	Level of Impact	Excerpt from NOP
		can occur on slope gradients of as little as one degree but is more common in areas that contain an exposed slope.”
VIII. GREENHOUSE GAS EMISSIONS	Potentially Significant Impact	“Construction and operation of the proposed Project would generate GHG emissions, both directly and indirectly.” “. . . activities would result in prolonged sources of GHGs”
IX. HAZARDS AND HAZARDOUS MATERIALS.	Potentially Significant Impact	<p>“(DOGGR) identified a former oil and gas well located on the vacant Flagler Lot.”</p> <p>“Asbestos Containing Material . . . commonly used as insulation and fire retardant when the existing facility was constructed over 50 years ago. Inhaling asbestos fibers has been shown to cause lung disease (asbestosis) and lung cancer (mesothelioma) (DTSC 2019).”</p> <p>“Lead was formerly used as an ingredient in paint . . . Lead is listed as a reproductive toxin and a cancer-causing substance; it also impairs the development of the nervous system and blood cells in children (DTSC 2008)”</p> <p>“The nearest existing schools to the Project site are Tower Elementary School (350 feet to the east), Beryl Heights Elementary School (approximately 900 feet to the west), and Redondo Union High School (located approximately 0.30 miles to the southwest).” “impacts on hazardous materials sensitive receptors”</p>
X. HYDROLOGY AND WATER QUALITY	Potentially Significant Impact	“Construction activities during each of the three phases could potentially degrade water quality and could lead to a potential violation of water quality standards or waste discharge requirements.”
XI. LAND USE AND PLANNING	Potentially Significant Impact	“Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect”
XII. MINERAL RESOURCES	No Impact	
XIII. NOISE AND VIBRATION	Potentially Significant Impact	<p>“The operation of heavy equipment during construction would generate noise both on- and off-site.”</p> <p>“the noise generation during each of these phases could result in potentially significant impacts.”</p> <p>“located approximately 75</p>

Category	Level of Impact	Excerpt from NOP
XIII. NOISE AND VIBRATION (continued)		<p>feet from the nearest residence across Flagler Lane. Towers Elementary School and Beryl Heights Elementary School are also located in close proximity to the Project site. Given the proximity of adjacent development and sensitive receptors, construction activities, particularly along the margins of the Project site, could also result in potentially significant ground borne vibration impacts.”</p> <p>“In particular, the proposed entrance to the proposed subterranean parking structure along Flagler Lane could introduce substantial vehicle traffic in this area, entering and exiting from the newly established driveway.”</p> <p>“Additionally, a potential increase in noise from emergency response vehicle sirens may occur due to the increased elderly residential population resulting from the proposed Project.”</p>
XIV. POPULATION AND HOUSING	Potentially Significant Impact	<p>“Following the complete. . . Master Plan, 420 units would be available to residents of the Beach Cities and surrounding communities. This redevelopment would result in a minor increase to the local population”</p>
XV. PUBLIC SERVICES.	Potentially Significant Impact	<p>“420 units would be available to residents of the Beach Cities and surrounding areas. Such senior facilities may create substantial demand for first responder services, particularly from paramedic or ambulance services.”</p> <p>“Project may result in an increased demand for police services, potentially resulting in the need for new or expanded police facilities.”</p>
XVI. RECREATION	No Impact	
XVII. TRANSPORTATION	Potentially Significant Impact	<p>“Construction workers traveling to the Project site as well as construction vehicles and equipment and construction materials deliveries would generate vehicle trips to the area.”</p> <p>“Construction activities may also require temporary lane closures, sidewalk closures, and or create potential conflicts with vehicles pulling out of surrounding residential neighborhoods.”</p> <p>“construction activities on the Project site (e.g., vehicles pulling in and out of the designated construction entrance and transiting nearby streets) may result in hazardous conditions in the Project vicinity</p>

Category	Level of Impact	Excerpt from NOP
XVII. TRANSPORTATION (continued)		<p>throughout the duration of construction activities”</p> <p>“Additionally, given the proximity of existing residences, schools, and parks, heavy haul truck trips required for export from the Project site and/or materials delivery to the Project site could result in potentially hazardous conditions off-site as well.”</p> <p>“Operationally, the proposed Project would result in the development of an additional entry to the subterranean parking garage off of Flagler Lane. Additionally, the vehicle circulation area proposed as a part of Phase 3 would also include substantial reconfiguration of the main entrance to provide for ride-share drop-off and short-term parking. These improvements could result in potential vehicle queues that may result in potentially hazardous conditions where cars from turn lanes operating above capacity may back into traffic lanes, obstructing through traffic along the adjacent roadways including Flagler Lane, Beryl Street, and North Prospect Avenue.”</p>
XIX. UTILITIES AND SERVICE SYSTEMS	Potentially Significant Impact	<p>“The proposed Project would require the relocation of existing utilities, potentially including water, storm water drainage, wastewater, electrical power, natural gas, and/or telecommunications lines. This would likely require extensive trenching within and immediately adjacent to the Project site”</p> <p>“the increase in assisted living units under the proposed Project would result in an increase for the demand of a long-term supply of water. Therefore, a supply of water sufficient to serve the proposed Project would potentially impact or alter the supply of water currently serving other uses. Impacts to water supply would potentially be significant”</p> <p>“Solid waste generated during operation, as well as construction and demolition material, would have the potential to exceed the capacity of Athens Services facility and other local and regional solid waste facilities, and could potentially conflict with established local, regional, and statewide solid waste regulations. Therefore, the proposed Project could result in potentially significant impacts to solid waste generation”</p>
XX. WILDFIRE	No Impact	

Category	Level of Impact	Excerpt from NOP
XXI. MANDATORY FINDINGS OF SIGNIFICANCE	Potentially Significant Impact	<p>“Project could result in potential operational impacts – including impacts related to air quality, greenhouse noise, transportation and traffic, etc. – the proposed Project has been designed for long-term benefit, including addressing seismic issues associated with existing buildings, the provision of additional green space, and the provision of additional health and fitness offerings serving the Beach Cities.”</p> <p>“The proposed Project, in conjunction with other past, present, and reasonably foreseeable future related projects, may have the potential to result in significant cumulative impacts when the independent impacts of the proposed Project and the impacts of related cumulative projects combine to create impacts greater than those of the proposed project alone.”</p>

Toward the end of the NOP, there is a sentence, which I’ve included below, with some items highlighted in bold by me.

Potentially significant impacts to the following resources may have potential to cause **substantial adverse effects on human beings**: aesthetics, **air quality**, **biological resources**, cultural resources and tribal cultural resources, energy, geology and soils, greenhouse gas emissions, **hazards and hazardous materials**, **hydrology** and **water quality**, land use and planning, **noise and vibration**, **population** and housing, **public services**, **transportation and traffic**, and **utilities** and service systems.

Certainly, one may point out that the report’s findings indicate that the Project “may” have a “potential” impact. I would point out, though, that the report has categorized impacts which I’ve highlighted in the table, as Potentially **Significant**, whereas categories of other items were one of the following:

- Less than Significant with Mitigation Incorporated
- Less than Significant
- No Impact

□□-1

So, the findings are significant, and mitigation is not incorporated. The mitigation steps indicated by the NOP and BCHD website appear to be weak-- not really addressing the impacts. For example, the project, upon final completion, would have an “active green space.” The pictures of grass fields and trees, called the “Community Wellness Pavillion” look nice, but wouldn’t be completed until phase 2 of the master plan, which is scheduled to finish in 2029. This does not appear to mitigate anything. The proposed space is small enough, that it does not offset the vast potentially significant hazards and issues the Project could cause. This is not enough of a mitigation, nor do I see any real indication that BCHD wants to seriously mitigate, or has the ability and funding to mitigate the potentially significant impacts caused by the Project.

□□-□

Also mentioned is a 50 foot bike lane. Really? 50 feet. The picture in the report shows a bike lane which appears to starts out of no where, and go no where. It is just ridiculous, and not the least bit

□□-□□ helpful. In fact, the bike lane would run right in front of the new entrance-- causing traffic jams as cars wait for cyclists to go by. The bike lane is absolute absurdity, not realistic, and the fact that it is included in the Project, illustrates that BCHD is desperately grasping for mitigation ideas, but clearly doesn't have anything that comes close to mitigating the potentially significant impacts.

□□-□□ To mitigate some of the traffic issues that may affect the community directly east of the Project site, I suggest closing off car traffic to Towers St. from Flagler lane. Vehicles could access the Project site from Flagler, but nothing else. I'm suggesting to make Flagler a dead end. Residents can access the area through other streets, such as Del Amo Blvd, and 190th St. The wall should allow pedestrian and bicycle access.

□□-□□ BCHD's project appears to have little to do with improving the community's health. I don't see how it would help the Beach Cities community or anyone who is not using the proposed assisted-living facilities. In fact, the Project appears that it may **significantly negatively** impact the health of the community during the 15 years of construction. Children could end up growing up walking to various places, such as nearby Towers Elementary School, and nearby parks, while being inundated with the noisy din of construction, choked by the pollutants, particulates, and falling rocks, all while being overshadowed by the enormous construction site, looming above the nearby community. No one who really stood for health would undertake such a plan that would shroud the local community in misery for 15 years or more (and when has a construction project of this magnitude been completed on time?)

□□-□□ I propose that BCHD does one or more of the following:

- 1. Decrease scope of the Project to something significantly more manageable, significantly less hazardous, and/or significantly less costly
- 2. Come up with a significant number of mitigation ideas that are practical, and could actually mitigate the potentially significant hazards and issues described in the NOP.
- 3. Spread the Project over multiple sites so that each site is not potentially impacted so significantly, for such a potentially significant amount of time.
- 4. Imagine that your kids went to Towers Elementary School, "approximately 350 feet to the east" and re-think the Project so that it doesn't potentially poison, pollute, and severely impact the lives of children in the community. How would you implement this in your backyard?

BCHD should reconsider the Project. BCHD's decision to go forward with such an enormous project with ridiculously weak mitigation strategies would prove it doesn't care about my community's health.

Sincerely,
Vinay Raju
Vinay Raju

Ramos, Ryan

From: EIR <eir@bchd.org>
Sent: Tuesday, August 13, 2019 12:04 PM
To: Meisinger, Nick
Subject: Fw: BCHD Healthy Living Campus Master Plan

From: Vin Raju <vinraju@yahoo.com>
Sent: Monday, July 29, 2019 12:32 AM
To: HLCInfo <HLCInfo@bchd.org>
Subject: BCHD Healthy Living Campus Master Plan

Dear BCHD,

I read the Notice of Preparation (NOP) dated June 27, issued by Beach Cities Health District (BCHD) regarding the Environmental Impact Report (EIR) that is being prepared, and would like to comment on it here. BCHD is supposed to stand for health, yet this proposed 15-year BCHD Healthy Living Campus Master Plan (Project) would appear to potentially cause significant negative health impacts to the local community. BCHD proposes some steps to mitigate these impacts, but the mitigation steps sound like lip service, as opposed to actual ideas which could realistically lessen the numerous potential impacts outlined in the NOP. This concerns me a great deal, especially as a resident and father of two elementary school children whose entire childhood would be impacted by this project.

The NOP document describes numerous potential impacts of the Project. The vast majority of impacts are indicated as "potentially significant." The ones that are especially important to me are: Air Quality, Hazardous Materials, Water Quality, Noise, Population and Housing, Public Services, Transportation, and Utilities and Service Systems. These categories affect the health and well being of my family and the local community. The NOP indicates that the Project may have a Potentially Significant Impact on all of these most important categories.

Toward the end of the NOP, there is a sentence, which I've included below, with some items highlighted in bold by me.

Potentially significant impacts to the following resources may have potential to cause **substantial adverse effects on human beings**: aesthetics, **air quality**, **biological resources**, cultural resources and tribal cultural resources, energy, geology and soils, greenhouse gas emissions, **hazards** and **hazardous materials**, **hydrology** and **water quality**, land use and planning, **noise and vibration**, **population** and housing, **public services**, **transportation** and **traffic**, and **utilities** and service systems.

Certainly, one may point out that the report's findings indicate that the Project "may" have a "potential" impact. I would point out, though, that the report has categorized impacts as Potentially **Significant**, whereas categories of other items were one of the following:

Less than Significant with Mitigation Incorporated
Less than Significant
No Impact

So, the findings are potentially significant, and mitigation is not incorporated. The mitigation steps indicated by the NOP and BCHD website appear to be weak-- not really addressing the impacts. For example, the project, upon final completion, would have an "active green space." The pictures of grass fields and trees, called the "Community Wellness Pavillion" look nice, but wouldn't be completed until phase 2 of the master plan, which is scheduled to finish in 2029. This does not appear to mitigate anything. The proposed space is small enough, that it does not offset the vast potentially significant hazards and issues the Project could cause. This is not enough of a mitigation, nor do I see any real indication that BCHD wants to seriously mitigate, or has the ability and funding to mitigate the potentially significant impacts caused by the Project.

Also mentioned is a 50 foot bike lane. Really? 50 feet. The picture in the report shows a bike lane which appears to start from no where, and go no where. It is just ridiculous, and not the least bit helpful. In fact, the bike lane would run right in front of the new entrance-- causing traffic jams as cars wait for cyclists to go by. The bike lane is absolute absurdity, not realistic, and the fact that it is included in the Project, illustrates that BCHD is desperately grasping for mitigation ideas, but clearly doesn't have anything that comes close to mitigating the potentially significant impacts.

To mitigate some of the traffic issues that may affect the community directly east of the Project site, I suggest closing off car traffic to Towers St. from Flagler lane. Vehicles could access the Project site from Flagler, but nothing else. I'm suggesting to make Flagler a dead end to prevent additional traffic from trying to get through the residential area from Flagler. Without this closure, I foresee much

VR2-1 increased traffic through the residential area. Residents can access the area through other streets, such as Del Amo Blvd, and 190th St. The dead end should allow pedestrian and bicycle access.

BCHD's project appears to have little to do with improving the community's health. I don't see how it would help the Beach Cities community or anyone who is not using the proposed assisted-living facilities. In fact, the Project appears that it may **significantly negatively** impact the health of the community during the 15 years of construction. Children could end up growing up walking to various VR2-2 places, such as nearby Towers Elementary School, and nearby parks, while being inundated with the noisy din of construction, choked by the pollutants, particulates, and falling rocks, all while being overshadowed by the enormous construction site, looming above the nearby community. No one who really stood for health would undertake such a plan that would shroud the local community in misery for 15 years or more (and when has a construction project of this magnitude been completed on time?)

I propose that BCHD does one or more of the following:

- VR2-3 1. Decrease scope of the Project to something significantly more manageable, significantly less hazardous, and/or significantly less costly
- 2. Come up with a significant number of mitigation ideas that are practical, and could actually mitigate the potentially significant hazards and issues described in the NOP.
- VR2-4 3. Spread the Project over multiple sites so that each site is not potentially impacted so significantly, for such a potentially significant amount of time.
- 4. Imagine that your kids went to Towers Elementary School, "approximately 350 feet to the east" and re-think the Project so that it doesn't potentially poison, pollute, and severely impact the lives of children in the community. How would you implement this in your backyard?

BCHD should reconsider the Project. BCHD's decision to go forward with such an enormous project with ridiculously weak mitigation strategies would prove it doesn't care about my community's health.

Of course, I would like to receive regular project updates. Please keep me informed.

Sincerely,
Vinay Raju

Lamb, Kaylan

From: EIR <eir@bchd.org>
Sent: Thursday, July 25, 2019 10:39 PM
To: Meisinger, Nick
Subject: Fw: BCHD Expansion Project

Importance: High

From: Ramskill, Steven <sramskill@decurion.com>
Sent: Wednesday, July 24, 2019 10:16 PM
To: EIR <eir@bchd.org>
Subject: BCHD Expansion Project

Hi

I wanted to share my thoughts and concerns regarding the proposed BCHD expansion project. My family moved into the neighborhood 5 years ago as we were expecting our second child and looking for a larger home in a more family friendly neighborhood. Soon after we moved in it was clear we made a great decision and had found our family home where are kids could grow-up in a safe environment with wonderful neighbors and great access to local amenities. This was also a significant investment that my wife and I decided to make for the benefit of our family. While I was aware of the proposed project and attended a meeting with BCHJD last year to discuss, it wasn't until I attended the Torrance meeting at West High school last week that the magnitude and foreseeable impact became clear and deeply concerning and upsetting. While I share the concerns of many of my neighbors specifically regarding the impact this project will have on air and noise pollution, traffic and overall safety concerns given the logistics and activity of the project, the broader concern I have relates to the overall quality of life for my family, neighbors and other local residents. This was intended to be our family home where our two children (William 8, Isabella 5) would grow up and likely spend their next 12-15 years. I am now faced with a serious decision as to whether I want my children to remember the vast portion of their time at their family home having a construction site in their back yard or to time the sale of my property to minimize any financial loss based on what this project will have on our home values. I'd love to know how those who make the decisions would think if their children had a huge construction project spanning over 15 years on their doorstep.

My son has suffered from child asthma and occasionally needs his nebulizer, so the thought of poor air quality (pollution) is of great concern. Our safe neighborhood allows us to leave our front door open and enjoy the wonderful sea breeze that prevents the need to purchase AC and was a big sell even noted on the home sale leaflet (wonderful Million Dollar Sea Breeze). Traffic has always been the one key concern since moving in as our road (I live on the corner of Towers and Redbeam) is a very popular cut through and too often idiot drivers screech by as they cut the corner and often ignore the stop signs. This project, unless the road is blocked to through traffic which I strongly advocate for despite the inconvenience to myself will exacerbate this issue and I am very concerned will increase the risk of injury or worse given the school activities and simply neighbors being outside enjoying a walk etc.

The hardest part to swallow is that this project is to benefit Redondo Beach, Manhattan Beach and Hermosa Beach (I used to live in Redondo Beach) in many ways, including financially and yet it seems that out

neighborhood will be the most impacted negatively and the icing on the cake is that we get to see the back of the proposed facility and we get the entrance and exit to the parking structure which one would agree is always the worst aspect of any construction.

I would be happy to discuss my thoughts on a viable project that considers air pollution, traffic, scope, project length and greater consideration for its Torrance neighbors as I believe in what BCHD is looking to provide but in no way support the current proposal.

Many Thanks,

Steven G. Ramskill
Food and Beverage Director

ArcLight Cinemas | Pacific Theaters
120 N. Robertson Blvd
Los Angeles, CA 90048

+1 (310) 855-8205 direct
+1 (323) 363-3390 mobile

19402 Redbeam Avenue
Torrance, CA
90503



Lamb, Kaylan

From: EIR <eir@bchd.org>
Sent: Friday, August 02, 2019 1:32 PM
To: Meisinger, Nick
Subject: Fw: BCHD- Public Comments on Proposed Project

From: Alice Ronne <akronne17@gmail.com>
Sent: Saturday, July 27, 2019 8:29 PM
To: EIR <eir@bchd.org>
Cc: OMartinez@torranceca.gov <OMartinez@torranceca.gov>
Subject: BCHD- Public Comments on Proposed Project

Alice K. Ronne
19945 Tomlee Avenue
Torrance, CA 90503

TO: EIR@bchd.org
Nick Meisenger, NEPA/CEQA Project Manager
Wood Environment & Infrastructure Solutions
9210 Sky Park Court, Suite 200
San Diego, CA 92123

RE: Beach Cities Health District proposed project
Comments to be entered into the study for the EIR draft

Dear Mr. Meisinger;

I am writing to you in regards to the proposed BCHD Healthy Living Campus . It is my understanding that my document will be entered as a public comment on or relating to the BCHD project.

As a resident of Torrance (specifically Tomlee Avenue) I find it appalling that no where in any of the BCHD documents has the health and welfare of Torrance residents been addressed. I find it very disturbing that the most impacted designation, Towers Elementary

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School was not even included in the overall photos/renderings presented by BCHD. How can you ignore an entire campus of kids? With an enrollment of approximately 600 students and being downwind of the project, there has been no identification of these issues provided by BCHD as to the devastating effects on children 5-11 years of age. It is BCHD's responsibility to include in their scope of review impacts which will allow studies (findings, notations, informative facts) to show that they have thoroughly and properly "done their homework" to protect the health and safety of these kids. This is an obviously flawed project.

In reference to the school, there have not been any concise statements made to address the health and safety of the public (both the students and elderly) in the neighborhoods directly east of the proposed facility. All attention has been focused on areas that are referred to as "Beach Cities" - Redondo, Hermosa and Manhattan. The HLC is located on the most eastern boundary of Redondo Beach. Generalizations seem to be BCHD's forte since Torrance will be impacted the most with health (air quality, noise, traffic and construction aspects) issues and they have not addressed any of these topics other than vague generalizations. I want to know how they will monitor all of the above before, during and after school hours (they provide after-school day-care with the YMCA). No remarks have been made as to the great possibility of having to stop work/transporting if there is an "abuse" of limits to any of the above mentioned items. If you take the daily schedule of a Towers student (or any students in the area) it is comprised of drop-off in the morning, snack recess in mid-morning and lunch mid-day. The upper grades also have another recess in the afternoon. All of these "breaks" include playing on the playground(s). There are no precautions to monitor the areas that are played in/on. It is a positive fact that the dust particles will drift over and settle on the playground equipment, grass areas and their belonging stored outside of the classroom (racks now hold backpacks at Towers as there are no lockers there). Towers has a reputation of being an outstanding school in a neighborhood that has supported the education aspect of living. If these impacts on the children cannot be eliminated, this project cannot and must not go forward.

Traffic safety issues again are an enormous concern for this neighborhood. There is constant traffic racing through here, ignoring the stop on Mildred/Towers and negotiating the turn at Flagler Lane/Towers. Even the thought of putting a subterranean garage there is shocking! Imagine kids going to and from school (Redondo residents use Flagler Lane to commute on foot, bicycles/skateboards also), cars using that entrance, of which appears on the plans to be THE only entrance and exit for the Child Development Agency, senior living AND the Health Fitness Center is disasterous. BCHD MUST address all these issues over the entire timeline that has been featured as 15 years. Combined with the fact that emergency vehicles will be using that area to answer calls AND construction will be taking place in other

areas, the total picture is that there is a gigantic safety issue with this terrible plan which has not been addressed.



BCHD has made no effort to address the needs of the people who live in the community of Torrance. Their effort to schedule a “last minute” meeting, of which residents were left with a letter on their doorstep about the scoping meeting in the late afternoon of the day before, indicates to this individual that that not much consideration was given to anyone not in the BCHD. Yet all of the critical issues of air quality (release of hazardous elements in the construction stages), traffic safety issues, the use of Flagler Lane as the in/out to their garage (Flagler Lane is within the municipal boundaries of Torrance) and the impact of all of this to the students of the school have not been addressed for this project.



This morning the Daily Breeze released an article about BCHD’s plans for HLC. In it you will find statements that refer to the fact that it will cost \$530 million. They stated that they do NOT have a “partnership” to build the senior housing so how can they even consider a project of this magnitude to “happen”? You can refer to this article at:
<https://www.dailybreeze.com/2019/07/26/beach-cities-health-district-eyes-next-step-for-its-530-million-healthy-living-campu-in-redondo-beach/>



Mr. Bakaly, CEO, stated that he didn’t want to “stress people out”. If he is sincere about his comment, why is it that we are ALL stressed about his project? Why do we not get answers/comments from him? Is this an example of “healthy living”? Please address in the EIR draft BCHD’s plan to address the severe impact of stress upon the health, mental well-being, and quality of life of those residents including me within the construction zone of the project.



The quality of life here is something that no administrative person from BCHD can imagine. We chose this area for the schools when we were a young family. We’ve enjoyed the benefits of a quiet neighborhood with outstanding schools, a stellar medical community, close proximity to the LA Airport, fresh air and numerous other “bonuses”.

My love of gardening has brought about Monarch butterflies, El Segundo blue butterflies and a female duck with 11 ducklings that spent time this spring in our backyard. Along with the squirrels, racoons, possums and skunks, we have managed to co-exist with all of this. Working for an environmental company, can you imagine what this fatally flawed project will do to that balance of living in our area? It is inconceivable that this project has taken any of this into consideration.



Again please express in your draft EIR the BCHD plan to prevent destruction of the El Segundo Blue butterfly habitat in my yard as well as how you'll prevent impacts to migratory ducks and harm to my garden which I enjoy and which helps preserve a variety of protected wildlife species. I also like to garden as a way of fostering good mental health and the noise and air pollution will severely impact my ability to de-stress in my garden.



Our quality of life, health, and safety will be drastically impacted.

Thank you for addressing my concerns.

Sincerely,

Alice K. Ronne

**Robert R. Ronne
LAW OFFICE OF ROBERT R. RONNE, APC
Post Office Box 3211
Redondo Beach, CA 90277
(310) 322-1696**

□

July 22, 2019

BY FIRST CLASS MAIL AND E-MAIL (EIR@bchd.org)

Wood Environment & Infrastructure Solutions
9210 Sky Park Court
Suite 200
San Diego, CA 92123

Attention: Mr. Nick Meisinger, Environmental Planner

Re: Public Comments on Proposed BCHD Expansion Project

Dear Mr. Meisinger:

It is my understanding that you are involved in the process of completing the scoping review and required analysis preliminary to the preparation of that Environmental Impact Report (“EIR”, in any form) which will assess the viability of the Beach Cities Health District (“BCHD”) proposed expansion of their campus located in Redondo Beach, CA, as outlined in their June 27, 2019 “Notice of Preparation” (“NOP”) document (all of which actions are hereinafter sometimes and generally referred to as “the process”).

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It is my further understanding that the process, including assessment and preparation of the EIR, are governed by all applicable law and regulations, including but not limited to the California Environmental Quality Act (“CEQA”, California Public Resources Code, §§ 21000, et. seq.); and, the regulations promulgated thereunder (14 CCR §§ 15000, et. seq.)

Mr. Nick Meisinger, Environmental Planner
July 22, 2019
Page Two

I am a Torrance homeowner, residing in an area (Tomlee Avenue) which will be directly, indirectly, seriously, and irrevocably harmed by the BCHD proposal, and make those comments below as a member of the public so that they may be part of the record, as a matter of right.

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If I am mistaken in any assumptions, please advise immediately. I have the following.

1. Introduction.

A. Purpose of the Process.

The purpose of this process as a whole is to insure that: “All phases of a project must be considered when evaluating its impact on the environment: planning, acquisition, development, and operation.” (14 CCR § 15126).

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A fair review of the record and process to date discloses that BCHD has made every effort to avoid that required careful, comprehensive, and detailed review of the impacts. For example, page 20 of the NOP references Flagler Lane (a road wholly within the City of Torrance, and thus not within any of the municipalities which are part of the BCHD) as the “single entrance” to the newly proposed parking garage, as well as a potential entrance for other parts of the project.

Deliberately vague, where there is an entrance, there must be an exit. That issue is avoided, as are the serious risks presented by a “single” point of access for massively increased traffic on a residential street. This bald assertion without the ability for anyone to consider “all phases” of this project and their impacts is illustrative of BCHD’s cavalier approach to a serious process. Based on that conduct alone, the project need be rejected as inadequately framed. Therefore, this process may not proceed at all, until such time as legitimate submissions are made by BCHD which comply with all laws.

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Mr. Nick Meisinger, Environmental Planner
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Page Three

Further, even if the process based on current BCHD filings, applications, and proposals were allowed to continue (which should not occur), “alternatives to the proposed project” are required to be considered. (14 CCR § 15126 (f).) The full and fair review BCHD seeks to avoid would disclose the best “alternative” is no project at all.

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B. The Right of Public Participation.

Public participation is “...an essential part of the CEQA process”. (14 CCR § 15201).

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Indeed, in the process “... the public holds a ‘privileged position’...”, which is based “...on a belief that citizens can make important contributions to environmental protection and on notions of democratic decision making.” (See generally *Concerned Citizens of Costa Mesa, Inc. v. 32nd District Agricultural, Assoc.* (1986) 42 Cal. 3d 929.)

2. A Review of the Narrow Scope Presented by BCHD Discloses the Process is Flawed and Need Restart from the Beginning.

A. BCHD Failures Which are Fatal to its Submissions.

1) BCHD seeks to replace its own obligations with public input.

Regrettably, BCHD seems to ignore its own obligations by conflating the publics’ right to participate with satisfying its own duties. The regulatory guidelines provide to the contrary, and state:

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“Each public agency is responsible for complying with CEQA and these Guidelines. A public agency must meet its own responsibilities under CEQA and shall not rely on comments from other public agencies or private citizens as a substitute for work CEQA requires the Lead Agency to accomplish. For example, a Lead Agency is responsible for the adequacy of its environmental documents”. (14 CCR § 15020)

Mr. Nick Meisinger, Environmental Planner
July 22, 2019
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The NOP carefully avoids a number of issues, which cannot be cured by scoping meetings, or public comment submissions. In short, BCHD may not use the statements of members of the public (including this one) to either cure its own omissions, or to shirk its own legal obligations.

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2) BCHD need thoroughly address all significant impacts.

The superficial nature of BCHD’s submissions evidences its desire to avoid a legally complete EIR. Thus, while BCHD nominally notes that the project will create significant impacts stemming from “noise and vibration”, “transportation”, and “air quality” (amongst many others), the stunning lack of details on items such as those is telling.

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Just one example is found at page 32 of the NOP. There, it is noted that a Torrance school, Towers Elementary School, is 350 feet from the project. Without fail, this project will impact hundreds of children merely hundreds of feet away from the massive project. By ignoring impacts, and simply nominally and cursorily referencing places and distances, BCHD offers no legally sufficient details on which a proper assessment and analysis can begin. Further, such vague assertions blatantly and willfully seek to prevent the legally mandated and “privileged” public review of the project.

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Another example is found at page 20 of the NOP. There, Flagler Lane (a road wholly within the City of Torrance, and thus not within any of the municipalities which are part of the BCHD) is referenced as the “single entrance” to the newly proposed parking garage, as well as a potential entrance for other parts of the project. That reference is buried in the middle of a paragraph, and reflects an attempt not to address impacts, but to conceal them. We have no guidance from BCHD about how to begin to even assess how a sole area of ingress of what promises to be a commercial enterprise onto a residential street will affect transportation, noise and vibration, air quality, public services, or any of the other impacts identified.

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Mr. Nick Meisinger, Environmental Planner
July 22, 2019
Page Five

A fair review of the record and process to date discloses that BCHD has made every effort to avoid a careful, comprehensive, detailed review of the impacts. Because BCHD has not come close to satisfying its obligations, their submissions are void and the process ends. Unless and until BCHD makes a prima facie showing, they may proceed no further.

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The rule is clear: BCHD may not “...release a deficient document hoping that public comments will correct defects in the document.” (14 CCR § 15020). Because BCHD is attempting to do just that, the current process is void. They must start over.

B. BCHD Fails to Identify Every Significant Impact During “All phases “of its Proposed Project.

BCHD must disclose and place within the scope of review all facts and issues which may arise from their project during the process. Their obligation is clear, and non-delegable: “All phases of a project must be considered when evaluating its impact on the environment: planning, acquisition, development, and operation.” (14 CCR § 15126).

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As noted, even a cursory review of the process reveals that BCHD has not even come close to complying with its obligations. Their failures provide further evidence of bad faith in even invoking the process.

C. BCHD Impermissibly Narrows the Focus of Issues for Review.

BCHD seems intent on narrowing, minimizing, or outright ignoring their duty to identify impacts in a fair manner in order to permit the legally required proper scoping of the issues, along with informed public commentary.

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The rule is unambiguous: The sufficiency of BCHD submissions is determined by whether they identified and analyzed "...the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated." (14 CCR § 15204). Because the NOP attempts to narrow and ignore in their NOP impacts which are severe and pervasive, the process fails at this early stage.

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By way of illustration, BCHD was obligated to identify and address factors which include "...the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project...". (Id.)

Even a brief review of each of those three (3) required factors shows BCHD inadequately discharged even the most basic of their obligations.

- Magnitude of project.

The project is massive, and proposed changes to the environment are as devastating as they are many. BCHD made no effort to identify the magnitude of impacts, or place them in any context of how the project will be implemented, who will be affected, how, and to what degree. To the extent any issues are mentioned, they are minimized rather than the impacts being fairly disclosed.

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-Severity of impacts.

An impartial reading of BCHD's submissions reveals they assiduously avoid identifying the severity of the impacts of their project.

Death, long term health hazards to all nearby residents and invitees (especially the vulnerable young and old, many of whom reside in, travel to, or spend the day in the impacted project zone) all are impacts that must be evaluated. One suspects that those impacts are ignored, omitted, and/or minimized as BCHD know that careful assessment of each significant impact would terminate the project.

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Mr. Nick Meisinger, Environmental Planner
July 22, 2019
Page Seven

-Geographic scope of the project.

The scope of the sprawling campus proposed is staggering. (See above and below discussions). The project is so disproportional, so impractical, so out of character with its geographical surroundings that it will suffice to say that the overall environmental impact would be like placing the Titanic in my bathtub.

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3. The Impacts of the BCHD Project are Negative, and Devastingly So.

We have seen over and over again that BCHD has shown bad faith in the process, which should require them to start over. If, however, by some quirk of fate BCHD is allowed to continue the process, 14 CCR § 15126.2 (a) provides guidance on the minimum assessment and analysis that need be considered.

“An EIR shall identify and focus on the significant environmental effects of the proposed project. ... **Direct and indirect significant effects** of the project on the environment **shall be clearly identified and described**, giving due consideration to **both the short-term and long-term effects**. The **discussion should include relevant specifics of the area, the resources involved, physical changes, alterations to ecological systems, and changes induced in population distribution, population concentration, the human use of the land (including commercial and residential development), health and safety problems** caused by the physical changes, and other aspects of the resource base such as water, historical resources, scenic quality, and public services.” (Emphasis added)

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Any further BCHD efforts to advance the process (which should not be allowed until a fair submission is made, if ever) must at a bare minimum, include the following for analysis, review, assessment, consideration, and evaluation.

A. Significant Impacts.

Worth emphasizing, BCHD's submissions contain nothing but vague generalities. BCHD has provided no path by which identified impacts such as "noise and vibration", "transportation", and "air quality" (listed only for illustration) can be fully and properly evaluated.

For example, how much noise (how many decibels?) For how long? Who will be affected? How? What is the vulnerability level of those impacted (e.g., very young and very old)? What is the cumulative effect of the noise?

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Vibration from what source? Trucks? How many? What size? Where and when will these trucks be coming from (e.g., routes, road closures, and whatever else BCHD omitted)? What contaminants or particulates will be emitted? Who will they impact? How will those people be impacted?

Vague, incomplete, and potentially purposefully evasive submissions are not what was envisioned or permitted by the CEQA.

B. Direct and indirect impacts.

BCHD appears to "merge" all harmful impacts into one "basket". This is a practice which is used by those who prefer to conceal the discrete impacts which might be found at each stage of this multi-pronged, multi-decade project. Thus, a fair discussion about the multiple and various age groups and populations affected is avoided. Again, this is not what the law encourages or permits.

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C. Short- and long-term impacts.

The same problem exists here. No effort is made to compartmentalize the impacts into time frames over the decades of the project.

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For example, at various points, traffic and transportation issues may be a nuisance for a short period of time but may create dangers of serious injury or death over other, more significant periods of time, including over the long term. By compacting time frames and vaguely addressing points, BCHD seeks to avoid a full, thorough EIR process.

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By way of not all-inclusive examples of impacts, who will pay for the additional wear and tear on roads? Will trucks carrying heavy loads on local streets (many of which are characterized by steep grades) be able to make it uphill? If they lose control on a downhill run, will escape lanes (such as seen on steeply graded highways) be necessary to prevent fatalities? How will vehicles be prevented from careening into someone's living room?

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What routes will be taken? Some are closed to heavy loads. Others traverse directly in front of the Towers Elementary School. That "impact" is too great a risk, but is ignored by the Lead Agency, BCHD.

BCHD (which by definition is an agency which only serves Redondo Beach, Hermosa Beach, and Manhattan Beach) proposes to use only Torrance roads during portions of construction. For some parts of the project, they later use those roads exclusively for ingress and possibly for egress. Where is the equity in placing the sole burden on a non-beneficiary municipal entity and residents? Thus, yet another compelling example of BCHD ignoring impacts, especially those which are likely to lead to serious physical injury or death, is in the record.

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In fact, a fair finding may be there are no routes which construction vehicles are either permitted to traverse at all; or, even if permitted, which may be safely traversed in order to access the construction project.

BCHD obviously would prefer to avoid evaluation and assessment of such impacts. Yet, the law and rules are clear: It was the obligation of BCHD to bring forward impact issues. With certainty, this and other public comments will be incomplete. As noted, the public is not expected to "fill in the gaps" for BCHD.

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Hence, the process has not been properly invoked and must await satisfactory filings by BCHD.

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D. Health and safety impacts.

The impacts upon the “population” (one of the identified impacts, and a required area of discussion, “health and safety” under 14 CCR § 15126.2 (a)) are paramount.

Here the impacts from the BCHD project range (by way of example) from fatal traffic patterns and incidents to fatal health issues affecting the vulnerable (young and old) especially.

As to air quality and air borne toxins and pollutants, it should be emphasized here that it is not clear what construction materials will be used on the project, or what pollutants or toxic materials will be found during excavation. (Apparently there is the potential for toxic soils, which might require reporting, remediation, or some other legally mandated action). Materials contained in demolished structures which are released as the project progresses are at risk of forming “toxic clouds”. Toxins will float east with the wind, descending upon the children at Towers; on those in the abutting neighborhood; on the elderly who are home all day; and, on all others who happen to be situated yards east of the project on those days.

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Bottom line: These impacts, and more, are risks which create devastating, life threatening health problems. The project impacts include irreversible harms to the nearby population. Yet, BCHD choses to ignore the impacts on the children, the elderly, and anyone else who has the temerity to reside east of their project. The failure to include such serious and significant environmental impacts within the scope of the EIR is appalling.

-Safety Concerns and the young.

Even without the project, the number of incidents of drivers ignoring the stop sign at Towers and Mildred, as well as other instances of dangerous driving near the construction zone, are many. Adding the project’s impacts will endanger everyone within the project area, especially the most vulnerable among us.

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Hundreds of children walk, bike, skateboard, or are dropped off daily within (BCHD admits) a few hundred feet of a massive construction zone. Every day that population will be exposed to serious risk of injury or even death. The responsibility for those impacts falls on those who would carelessly and callously propose such a dangerous project.

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-Schools and the young.

=Summary.

Again, BCHD paints with a broad a brush, ignoring specifics. In addition to the safety issues, “noise and vibration” admittedly created by the project occurs merely 350 feet from the Towers school. By not being specific, BCHD hopes such impacts will either be ignored, or be seen as merely “inconvenient”. Providing details risks disclosing the significant environmental impacts, which evaluation BCHD seeks to avoid.

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While noise and vibration may be a serious impact for a healthy adult, the impact on a child can be so negative, so life changing, such a future destroying event that it would be unconscionable to allow a project to impose those harmful impacts. Here are the facts which support that conclusion.

=Background.

The local Torrance neighborhood invites over 500 elementary school children into it every day. We know that Towers Elementary School is identified in the NOP as being so close (350 feet) to the project as to be essentially part of and located within the project. The Towers demographic is 5 to 10-year-old kids. Again, by not being specific, BCHD avoids a discussion of the range of impacts and harms caused by “noise”. Even a cursory review of that type of impact shows us that noise and vibration do not create a trivial impact on children. Rather, impacts are permanent, including learning deficiencies, along with physical and emotional harm.

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=Noise

The National Institute of Health supports this conclusion. Here is a portion of their findings on the hazards of “noise exposure” to the school age population:

“Observational and **experimental studies have shown that noise exposure impairs cognitive performance in schoolchildren....** In this Review, **we stress the importance of adequate noise prevention and mitigation strategies for public health**”. Emphasis added.

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3988259/>

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=Vibration.

Not only is noise a documented health hazard, vibrations are frightening as well. In light of recent events, we appear to be in an “active” period for earthquakes after decades of dormancy. Children may easily mistake construction vibrations for a life-threatening earthquake. That could be traumatic to a child in the extreme.

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=Particulates and air quality.

Another impact is particulates (dust and maybe more noxious elements), perhaps in aerosol form, all of which are particularly harmful to the young body.

To make matters worse, the vast majority of the time, the prevailing winds flow directly over the project and onto and over Towers Elementary School, as well as nearby residential units. The influence of those sea driven winds is so pervasive that air pollution and particulates have been discovered and scientifically documented to travel hundreds of miles inland. It is more than foreseeable that whatever air borne materials are generated by the project will travel the hundreds of feet to Towers and residents.

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On top of that, all of the dust, aerosols, and other particulates will be emitted merely feet from a site where hundreds of children spend their entire day, much of it outside on the playground or open field (both of which are closest to the project).

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-Elderly.

Abutting the project is a Torrance neighborhood where residents (some less than 100 feet away) may be at home all day. Some are very old, and this project will not simply annoy them, but the impacts will include real harm.

Older residents are also more susceptible to the impacts of noise, vibration, and air quality. Such events include impacts which are fatal for a frail or elderly person. (No doubt BCHD current residents will also suffer from these impacts)

The National Institute of Health again speaks to the impacts of such hazards:

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“Observational and **experimental studies have shown that noise exposure** leads to annoyance, **disturbs sleep** and causes daytime sleepiness, **affects patient outcomes** and **staff performance in hospitals, increases the occurrence of hypertension and cardiovascular disease...** In this Review, **we stress the importance of adequate noise prevention and mitigation strategies for public health**”. Emphasis added.

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3988259/>

-Other impacts and concerns

Again, it was the duty of BCHD to identify proper impacts. The public does not have fair notice of significant environmental impacts and is largely left to “guess” at what they may be.

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Page Fourteen

Until BCHD starts from the beginning and provides proper filings, one is left in the limbo. The public has the right to a fair process. If that occurs, it need include all impacts, including an evaluation of an increase in crime associated with construction sites (many projects employ 24/7 guards who live on site to mitigate that impact. That does not solve for the abutting neighborhoods, however). Traffic deaths and injuries will follow the project from a variety of sources (e.g., the construction itself, and the increased traffic from a completed project, adding tinder to an already dangerous dynamic).

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If, on the first day of proposed construction, Towers Street at the Flagler intersection could be closed, with Flagler becoming a one-way street as it heads towards Towers Street, and continues its one-way journey along Diamond Street out to Prospect Avenue, it is possible some impacts could be mitigated.

In all events, because all of those roads belong to the City of Torrance, either Torrance must agree or the project must completely fail. Without a safe “flow” of traffic which eliminates the risk to children, and which allows the permanent burdens be borne by those who benefit from the project, no viable project exists.

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The most likely result of a full and complete evaluation is that no safe traffic flow can be created because the magnitude, severity of impacts, and geography just won’t permit it. BCHD has not adequately framed or scoped the issues to be addressed in the EIR. (Perhaps BCHD avoided identifying all serious, significant environmental impacts as it dooms the project).

In addition, an El Segundo Blue Butterfly was recently spotted in the area near the project. It may be that the protected endangered species of butterfly is attempting to restore its original habitat, which includes the project zone.

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Similarly, recently migrating water fowl are more frequently seen in the project area. The project is located in the dunes, historically, as noted, the Blue Butterfly habitat, and all of which is part of a wetland ecosystem. As such, migratory birds are federally protected. Again, one can only conclude BCHD ignored in its submission these critical issues of the environmental impact on migrating species as identifying them would render its project not feasible.

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In short, BCHD in its filings, including the NOP, impermissibly fails to address at any level the severe environmental impact on protected, endangered wildlife.

E. Public services

The Torrance residents in the impacted zone draw not on Torrance water, but instead on the same source as BCHD does, California Water Service.

Even without added service areas, the water pressure is low. To address this problem, a pumping station was added within the last several years at West High in Torrance.

This not a mere inconvenience. The low water pressure could reach critical levels with added drains from construction, and then later adding service locations, such as those proposed by BCHD would enhance the impacts.

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In addition, the water is at risk of becoming brackish, and frequent testing is done by California Water at Prospect and Del Amo. In short, there are numerous water quality and water delivery issues which the project would impact.

Add to this the antiquated electrical system in the area, inadequate roads to serve current residents, commuters, and other users, one can see there are yet more additional serious environmental impacts which were ignored by BCHD, merely strengthening the conclusion that they are acting in bad faith during the process.

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Another excellent example of BCHD’s two-fold efforts to ignore impacts and to (covertly) transfer those impacts created by the project to residents outside of the BCHD district is the conclusion reached in the NOP that extensive fire and police service impacts will be felt only in Redondo Beach.

As noted, police services in Torrance will almost certainly be impacted. Similarly, fire services, especially for toxic releases (with excavation of old oil wells and demolition of old, perhaps asbestos filled buildings which might ignite) will be needed. The Torrance Fire Department has experience in those areas, and will be called upon. Beyond that, common practice is for neighboring cities to commit police and fire resources even in routine matters, let alone to toxic events. The proximity of Torrance to the project makes service impacts severe.

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In the end, BCHD seems to have “carved out” impacts based on arbitrary standards which cannot serve as the basis for a proper assessment.

F. BCHD is acting contrary to its stated public purpose.

The mission of BCHD is to foster “health”. The project is dubbed the “Healthy Living Campus”. In commenting on a prior iteration of the project which was even more enormous, Tom Bakaly, the CEO of BCHD stated the project was “stressing people out”. (See the “Easy Reader” print newspaper, July 18, 2019 edition) He further stated, “That’s not OK for us.... We want to make sure we’re addressing all of the environmental impacts, and that’s why we need the communities help in determining those.” (Id)

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Two things.

First, the inconsistency between the project and the stated goals of BCHD evidences bad faith.

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Second, while public comment is necessary and privileged, the quote evidences the intent of BCHD to use the public comment as a substitute for discharging its own duties. That is legally improper, as has already been demonstrated. (Lead Agencies, including BCHD may not "...release a deficient document hoping that public comments will correct defects in the document." (14 CCR § 15020).)

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The number and variety of impacts BCHD did not identify are so numerous, so serious, and so compelling that one wonders why if BCHD wanted to "make sure" all impacts were addressed, they didn't.

G. Projects that can't be remediated or mitigated should not go forward.

There are too many omissions, too many impacts with serious, even fatal consequences which have not been addressed let alone identified. Projects in this early stage are not ready to proceed with the process.

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Thank you for considering my thoughts.

Very truly yours,

Robert R. Ronne

ROBERT R. RONNE

RRR/

**Robert R. Ronne
LAW OFFICE OF ROBERT R. RONNE, APC
Post Office Box 3211
Redondo Beach, CA 90277
(310) 322-1696**

□

July 24, 2019

BY FIRST CLASS MAIL AND E-MAIL (EIR@bchd.org)

Wood Environment & Infrastructure Solutions
9210 Sky Park Court
Suite 200
San Diego, CA 92123

Attention: Mr. Nick Meisinger, NEPA/CEQA Project Manager

Re: Public Comments on Proposed BCHD Expansion Project

Dear Mr. Meisinger:

As a member of the public, and as a Torrance homeowner residing in an area (Tomlee Avenue) which will be directly, indirectly, seriously, and irrevocably impacted and harmed by the BCHD proposal, I provide public comments supplemental to my July 22, 2019 submission, all of which should be part of the record, as a matter of right.

1) Police Services.

In the NOP, BCHD provides incomplete and inadequate evaluations and assessment, causing an improper narrowing of the scope of the review of the BCHD project. That tactic deprives the public of a full review and study of impacts, especially on Torrance residents, and as related also to the Torrance Police Department (“TPD”). There are at least two significant omissions. First, the focus of the NOP is on how police services (in Redondo Beach) might be impacted once the project is completed, which is many years down the road. BCHD has an obligation to address the impacts over the entire timeline of the project, from day one, through projected future issues.

Mr. Nick Meisinger, NEPA/CEQA Project Manager

July 24, 2019

Page Two

Second, in the NOP, BCHD essentially ignores how their project might impact services to the local communities which are provided by the TPD. As an example of clear and obvious omissions in the NOP by BCHD, the first phase of the project is certain to make heavy use of Torrance roads. The TPD would be required to investigate truck and other vehicle or pedestrian collisions, injuries, and fatalities occasioned by the BCHD project.

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Further, any crime associated with the BCHD construction project (construction sites are “magnets” for crime) is unlikely to be confined only to RB. Yet, BCHD portrays as fact in the NOP that only Redondo Beach will be impacted by a greater need for police services; and, again, they focus only on some obscure point in the indefinite future. Again, BCHD has a legal obligation to address every time frame of the project, every impact during each time frame, and to disclose each and every significant impact. Their failure to do so is more evidence of bad faith.

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In addition, one could reasonably anticipate that those committing crimes in and around the BCHD project would use Torrance roads as an escape route, implicated the involvement of the TPD. Further, “crimes of opportunity” will follow once it is noticed that the construction site is not in a remote area, but instead is in a residential area.

BCHD simply ignores the fact that TPD services will be impacted by the project. In addition to all of the above, other impacts could include the diversion of police resources, which is likely to result in diminished response times when Torrance residents are in need of services.

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These adverse impacts, outcomes, and results cannot be remediated or mitigated, which causes the BCHD project to fail.

3) Fire Services.

Please see discussion above. This impact looms large over Torrance residents because there is no doubt asbestos in the buildings BCHD proposes to be demolished. Any fire occurring would not only cause the contaminated cloud to waft over Torrance (prevailing winds would drive it), a Hazmat response would also be necessitated. With an oil refinery in Torrance, the TFD is expert in such matters, and would no doubt be called in by BCHD and Redondo Beach to assist, again depleting and diverting Torrance residents' resources.

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4) Water Services.

This point is largely overlooked because, yet again, because BCHD improperly and illegally narrows the issues. Water resources are not discrete, but are systems, including wells, aquifers, and delivery mechanisms. Thus, while BCHD includes some discussion in the NOP of water usage and related issues (NOP, pages 62-63), the discussion is again far too narrow. BCHD focuses exclusively on Redondo Beach. (Torrance is barely mentioned in the NOP, except in parts where BCHD shockingly checks "no impact" boxes). This is the exact opposite of what CEQA requires. BCHD is required to disclose all issues, not "cherry pick" to limit the EIR, and not to limit it only to impacts in BCHD zones.

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Here are some (non-exclusive) issues.

First, because part of the Torrance water supply is well water, the BCHD project will necessarily impact those wells. Will contaminants enter the ground during construction impacting water quality? (BCHD references "drainage" channels and "wastewater" vaguely and incompletely). Will the project draw on local wells? (The NOP discusses "water supply" and "reliability, but is again vague with a narrow, insular focus, mainly on Redondo Beach).

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Mr. Nick Meisinger, NEPA/CEQA Project Manager

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Page Four

Construction projects consume enormous amounts of water (a point only vaguely and incompletely referenced in the NOP). Where will the construction water come from? Will drawing that water deplete aquifers in Torrance? Will drawing that water so close to the coast deplete wells and make them more brackish? Will the project diminish water pressure? To what end and impact?

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5) Miscellaneous Points.

Torrance in general, including West Torrance, and the Pacific South Bay tract thereof, are those places which will be most impacted by BCHD's project. Each is a "destination" spot for young families, those wishing to "retire in place", and many others. The impact of this project will essentially devastate an entire neighborhood, including the schools within that neighborhood. To propose a project with that level of severe and irremediable impact, and then to fail to include any identification, assessment, or evaluation of those impacts in their NOP, is beyond bad faith and requires rejection of the BCHD project in full.

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Thank you for considering my thoughts.

Very truly yours,

Robert R. Ronne

ROBERT R. RONNE

RRR/

Martinez, Oscar

From: Ellis, Dorothy
Sent: Friday, July 26, 2019 2:04 PM
To: r.ronne.apc@gmail.com
Cc: Rizzo, Geoffrey; Mattucci, Aurelio; Chen, George; Santana, Danny; Martinez, Oscar; Aoki, Denise
Subject: FW: Health and Safety (and Other) Issues Arising from the Beach Cities Health District Proposed Massive Development Project
Attachments: z.Public.Comments.2019.07.22.pdf; z.Public.Comments.2019.07.24.pdf

Thank you, Mr. Ronne –

I have forwarded your email to Councilmembers Chen, Mattucci and Rizzo. I notice in your original notice below their email extensions are missing characters, i.e. the ‘v’ in .gov and the **CA** following Torrance. I also included the City’s Community Development staff.

Dorothy Ellis

Supervising Administrative Assistant – Office of the City Manager
City of Torrance | 3031 Torrance Boulevard | Torrance CA 90503 | 310.618.5880 voice | 310.618.5891 fax | DELLIS@TorranceCA.gov | www.TorranceCA.gov | www.Twitter.com/TorranceCA

From: Robert Ronne [mailto:r.ronne.apc@gmail.com]
Sent: Friday, July 26, 2019 10:03 AM
To: Ellis, Dorothy <DELLIS@TorranceCA.gov>
Subject: Fwd: Health and Safety (and Other) Issues Arising from the Beach Cities Health District Proposed Massive Development Project

WARNING: External e-mail
Please verify sender before opening attachments or clicking on links.

For your review, and please forward to Messrs. Chen, Rizzo, and Mattucci, whose e-mail addressed appear to be non-functional.

----- Forwarded message -----

From: Robert Ronne <r.ronne.apc@gmail.com>
Date: Fri, Jul 26, 2019 at 9:27 AM
Subject: Health and Safety (and Other) Issues Arising from the Beach Cities Health District Proposed Massive Development Project
To: <AMattucci@torrance.gov>, <GChen@torranceca.gov>, <GRizzo@torrance.gov>, <MGriffiths@torranceca.gov>, <TGoodrich@torranceca.gov>, <PFurey@torranceca.gov>, <MHerring@torranceca.gov>
Cc: <PSullivan@torranceca.gov>

Honorable Mayor, City Councilmembers, and City Attorney:

I write to you to with the hope of focusing your attention on the threats of serious harm, including death, posed by the expansion project ("the project") of Beach Cities Health District ("BCHD"). To be constructed on the western border of Torrance, each, every, and all Torrance residents will be impacted by the project with devastating consequences.

Please do not consider this communication to be merely a diatribe from a "grumpy NIMBY". The bad actors in this saga are those at BCHD who authorized a legally deficient Notice of Preparation ("NOP") of an Environmental Impact Report ("EIR") in relation to the project.

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Even a cursory review of the NOP will inform you that BCHD minimized or ignored harms to Torrance and our residents, exaggerated minimal issues so as to raise "straw men" issues they could easily defeat, and violated their most fundamental duty to provide a full, complete, and fair review of harms. Instead, they have attempted to shift their burden onto the citizens of Torrance.

A good example of BCHD's deceptive behavior is found in their promotional brochures. As will be noted, Towers Elementary School and its students will suffer intense harm from the project. Yet, in each "artist's rendering" of the project, and in all photographs of the site, Towers is either "cropped out" or not depicted. There is no greater act of bad faith than a governmental entity, such as BCHD, trying to deceive those who would be harmed into thinking they won't be.

Please don't take my word for it. Attached are three (3) PDF documents: The "NOP" (mislabelled "EIR"), 68 pages; my July 22, 2019 public comments regarding same, including properly scoping the EIR, 17 pages; and my July 24, 2019 public comments, 4 pages.

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Even a cursory review of those documents will disclose that BCHD acted improperly, and that we all have a duty to fully oppose the project moving forward even one more minute. Worse yet, the public comment period for the BCHD project closes at 5:00 P.M. on Monday, July 29, 2019. It is imperative that the City and its attorneys act timely and decisively to protect the health, safety, and welfare of Torrance residents, as well as valuable City resources, including tax payers dollars, all of which are in jeopardy from the project.

I provide here a brief, not all-inclusive summary of harms proposed to be inflicted on Torrance by the project. (For more details, please see the attached, and any other sources on which you chose to draw).

Health and Safety.

-Towers Elementary School.

=Air Pollution.

Directly downwind of the project, dust, fumes, and more toxic concoctions (perhaps in aerosol form, including asbestos and medical waste contaminants from demolition, lead, and other harmful elements) will waft over the school.

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=Death or Injury from Increased Traffic.

Already burdened by serious traffic hazards, hundreds of children are in the area every day. Construction vehicles, increased traffic, and other factors will elevate the risk of serious harm, including death, to those children. We are all duty bound to take action in light of this risk.

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=Noise Pollution.

Well documented, the ability of children to learn in a noisy environment is diminished. That, and other effects, will degrade our valuable Torrance schools, and more importantly, will harm our Torrance children.

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Police Services.

- Increased service requirements.

=Traffic collision impacts.

The first phase of the project will impact Torrance roads heavily. The TPD would be required to investigate truck and other vehicle or pedestrian collisions occasioned by the BCHD project.

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=Crime impacts.

Any crime associated with the BCHD construction project will not be confined to Redondo Beach. The number and frequency of calls by Torrance residents requesting services from TPD will increase.

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-Impacts on Torrance residents.

The BCHD project will thus divert TPD resources, diminish response times when Torrance residents are in need of services, and cause **all** Torrance residents to pay higher taxes for the increased burden on the TPD of the project.

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Fire Services.

-Same as above.

The impact on the TFD, and Torrance citizens and taxpayers, is even more compelling.

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For example, when a fire breaks out during demolition, the asbestos (and other toxic materials necessarily present in the buildings of the medical type) a Hazmat response will be needed. With the oil refinery in Torrance, the TFD is expert in such matters, and would no doubt be called in by BCHD/Redondo Beach to assist.

Water Services.

Torrance is barely mentioned in the NOP, except in parts where BCHD checks “no impact” boxes. Construction projects need a lot of water (a point BCHD noted, but only vaguely).

Where will that water come from? Will drawing that water deplete aquifers in Torrance? Will drawing that water so close to the coast deplete wells and make them more brackish? Will the project diminish water pressure? To what end and impact?

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I believe our elected officials would want to know how the Torrance water supply will be impacted by the project.

Quality of Life; a Fight for the Identity of Torrance.

The City of Torrance in general, including West Torrance, and the Pacific South Bay tract in particular, are “destination” spots for young families, those wishing to “retire in place”, and others. This is not only a neighborhood issue, however. As noted, all of Torrance will be required to suffer, including in the wallet, from this BCHD project. Even for those of you serving areas not on the west portion of the City, I wonder how all Torrance residents will feel when the increased financial burden imposed by the project foisted upon us by BCHD takes the form of the City of Torrance increasing revenue (i.e., more taxes) to pay for BCHD's “gold mine” of high-end care facilities.

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I can think of no reason why the Mayor, City Council, and all Administrative units within Torrance would not be 100% behind preserving the west side neighborhood, and Torrance overall, as the great place we know it to be. If you do not agree with that assessment, I would want to know why.

In the final analysis, the BCHD project is so out of line, so out of character, so inconsistent with any reasonable behavior that it is, as I noted in a submission, "like placing the Titanic in my bathtub".

Each and every citizen of Torrance looks forward to those who we entrust with the levers of power to manage our City to do the right thing and file public comments by Monday to protect the public health, to prevent death and serious injury, to preserve the quality of services we receive, to prevent health problems in the young and elderly, and to **prevent the inevitable tax increase** which the citizens of Torrance would bear for a project which benefits others while imposing virtually all the burdens on Torrance and its residents.

Please do not abandon us during this critical time.

Sincerely, Robert Ronne.
Concerned Torrance Citizen and Resident.

□□□-1□
□□□□□

Robert R. Ronne
LAW OFFICE OF ROBERT R. RONNE, APC
Post Office Box 3211
Redondo Beach, CA 90277
(310) 322-1696

July 27, 2019

BY FIRST CLASS MAIL AND E-MAIL (EIR@bchd.org)

Wood Environment & Infrastructure Solutions
9210 Sky Park Court
Suite 200
San Diego, CA 92123

Attention: Mr. Nick Meisinger, NEPA/CEQA Project Manager

Re: Public Comments on Proposed BCHD Expansion Project

Dear Mr. Meisinger:

As a member of the public, and as a Torrance homeowner residing in an area (Tomlee Avenue) which will be directly, indirectly, seriously, and irrevocably impacted and harmed by the BCHD proposal, I provide in this communication public comments supplemental to my July 22, 2019 and July 24, 2019 submissions, all of which should be part of the record, as a matter of right.

1) Speculative Nature of the BCHD Proposal.

a. Background.

The NOP references “financing consideration” three times (at pages 3, 13, and 22 therefor). Each reference is made in passing, and each relates to phase 1 only, usually and particularly to a parking structure.

Mr. Nick Meisinger, NEPA/CEQA Project Manager

July 27, 2019

Page Two

BCHD, not in the NOP, claims that the project is expected to cost \$530,000,000.00. (That figure is almost certainly low, in that it is unlikely cost over runs which are endemic to any construction project have been accounted for; or that an increase in costs occasioned by delays from the admitted lack of financing, obstacles in the permit process, or discovery of additional construction impediments of any type or nature have been included in the cost estimate. As has become the pattern, BCHD fails to disclose important and necessary impacts.)

Of that \$530,000,000.00, BCHD expects to use reserve funds of \$26,000,000 as a “down payment”. That down payment amount reflects about 4.9% of the total estimated project cost. Such an expenditure is said to leave BCHD with “roughly six months” of operating cost reserves (which small amount seems reckless, at best)

To make matters worse, the remaining \$504,000,000.00 (i.e., over *half a billion* dollars) is to somehow magically appear from a “partner” who will “operate” the assisted living facilities, as well as from “borrowing”.

Yet, BCHD has secure revenue (from tax receipts) of only \$3.7 million. Looked at another way, BCHD has verifiable income which amounts to merely 0.7% of their proposed debt. Any payments on over half a billion dollars in debt would no doubt be staggering, creating a debt to income ratio for BCHD of over 100%. Such a precarious financial state is not only untenable, it may well be illegal for a public entity that is not the federal government.

Where is the “white knight” partner expected to solve this financial nightmare? BCHD tells us that they don’t actually exist. And a committed lender who will fund the hoped-for borrowing? Also a ghost.

Mr. Nick Meisinger, NEPA/CEQA Project Manager

July 27, 2019

Page Three

Beach Cities Health District could solve this financial problem easily. As a governmental entity, with, inter alia, the ability to tax, to issue general obligation bonds to finance projects such as the one proposed, and the right of eminent domain (which would enable them to find a more suitable construction site), they have powers that others don't obtain (in advance of the project) a secure, steady, reliable source of construction funding.

b. The Illusory and Amorphous BCHD Project.

Yet, BCHD tells us that they have disdained the use of their only viable source to finance a capital improvement; their ability to tax. Their deception becomes a CEQA issue because scoping impacts becomes hypothetical, thus more problematic. We are faced with an exercise in fiction really. To borrow a phrase, BCHD attempts to turn the CEQA process into a riddle within an enigma.

The facts lead inevitably to the following conclusions.

- BCHD has no project. At all.
- Instead, what they propose depends fully on:
 - =the vagaries of financial markets,
 - =a non-existent "partner",
 - =the credit markets, and
 - =the economy.

The speculative, ever changing project which we now find has been proposed on a "hope and a prayer" is, at best, illusory. That fact, and plans to stretch the project very far into the future, eliminates any opportunity for impacted agencies, entities, business, and the public to receive a fair opportunity to assess and evaluate the BCHD project fully and fairly.

Unless and until all impacts can be reasonably identified and subjected to the legally required, mandatory CEQA processes, this project may not go forward.

□□-1 □
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c. Alternatives.

BCHD has a number of legitimate alternatives for making the project real so it can actually be legally and properly assessed and evaluated. They include:

-Have a general obligation bond, secured by general tax revenues in the district, in place *before* invoking the CEQA process.

□□-□ -Use their power of eminent domain to find a more suitable site, further north and west in their district. (The proposed project is so far on the fringe of the BCHD service area as to be largely useless to most Manhattan Beach, Hermosa Beach, and Redondo Beach residents)

A far more reasonable, sensible alternative is to place the benefits of this project, and its impacts, in the geographical heart of the district so that all may enjoy its alleged bounty. BCHD selecting an alternative which causes the project to actually exist is prerequisite to their invoking the CEQA processes.

d. Bad Faith of BCHD.

The further evidence of bad faith in BCHD's starting the CEQA process now is disturbing. Such includes:

□□-□ -The pattern and practice of lack of disclosure; or, when disclosing, continuing a pattern of providing false or misleading information.

- Concealing the fact BCHD proposes that (unknown and undisclosed) private entities will control a 95% interest in the project. That fact changes the entire dynamic and flouts the CEQA process.

BCHD is a governmental entity. While their consistent lack of transparency is appalling (not least because it is illegal), adding some private concern to the analysis which is not governed by the same rules adds to the discomfiture.

- Increased impacts from risk.

Instead of a public purpose project, BCHD will have less than 5% “skin in the game”, while a private entity may hold up to a 95% interest.

Not only does that surreptitious maneuver call into question the motives and intent behind the BCHD project, it adds substantial risk. Such includes lack of public input and lack of transparency. Private entities, especially outside “operators” and developers, routinely use a vast array of business and corporate structures to conceal identity, conceal financial distress, and to limit liability.

The consequences and impacts include a failure of accountability to the public; and, an inability to create a fair EIR, given the impacts have not only been not disclosed, but have been concealed and can’t be fully scoped.

Further, these obtuse private structures (holding a 95% interest) will dominant the (as yet non-existent) project.

Significantly, the project BCHD wants to have is not the one which they propose in their CEQA filings. Thus, their false and misleading NOP is void, and the process must summarily end now.

2) Risks from Failed or Abandoned Project.

- a. Private investment creates serious risk and thus more impacts.*

Yet another set of undisclosed risks with serious impacts are presented. The project as proposed has essentially a 100% risk of failure. Such failure will inevitably be followed by the abandonment of the construction site.

By way of example only (not all inclusive), additional impact risks include:

-Bankruptcy and/or transfer of public rights to private interests.

Private concerns have the right to, and at the “first sign of trouble” will declare bankruptcy. The project would be abandoned and left partially finished. (Different, more strict bankruptcy rules apply to governmental entities).

With a 95% private ownership ratio, the risk of either a private “takeover” of public facilities, a bankruptcy filing at some point over the proposed length of this project, or both, are extreme.

-Inadequate funding.

Undercapitalization or expansion of a business well beyond its means are the best paths to follow if one wants to insure failure of a project. (See link below to American Express comments on “7 ways rapid growth can kill your business”.)

<https://www.americanexpress.com/en-us/business/trends-and-insights/articles/business-growing-pains-7-ways-rapid-growth-can-kill-your-business/>

In proposing this project, BCHD has created the “poster child” for how to guarantee this project will fail. For example:

=BCHD refuses to use the taxing authority they have. Seeking taxes to fund this project would guarantee not only financial solvency, but the vote required would be a strong indicator of whether anyone really wants this project.

=BCHD has (woefully) inadequate funds to finance this project.

=BCHD, even though admitting the project is completely dependent on “financing considerations” (NOP, pages 3, 13, and 22), has no commitment from anyone to finance this project,

+Not one “private investor” is identified.

+Not one financial institution is named.

Mr. Nick Meisinger, NEPA/CEQA Project Manager
July 27, 2019
Page Seven

In short, there is more than ample factual support for the conclusion that this BCHD project proposal as submitted will be abandoned during construction. The impacts of that result need be assessed.

b. An abandoned project would be a disaster on all levels.

□□-□ BCHD has, on page 25 of the NOP, “checked” some boxes, and not others. This project as proposed should be in the “checks all boxes” category, and a failed project will remain in the category of maximum harmful impacts.

Below is a comment on merely some of the impacts an abandoned site would cause. (Again, the list is not inclusive. As a reminder, the law requires BCHD, not the public, create a legally sufficient document scoping **ALL** impacts):

BCHD may not “...**release a deficient document hoping that public comments will correct defects in the document.**” (Emphasis added. 4 CCR § 15020).

□□-□ -Aesthetics

What looks worse than a massive hole in the ground, or a partially completed structure?

□□-□ -Biological resources

All of the impacts identified by the public would remain, and are likely to be more severe.

□□-□ -Geology and soils

Same as above. DDT used in the area and exposed by the excavation would now combine with the soil, seeping into our water and blowing onto our children.

-Hydrology and water quality

□□-□

See geology discussion.

-Noise and vibration

□□-1□

Collapses of remnants of the structure, as well as efforts by someone at some point to demolish the abandoned structure will re-impose these impacts.

-Recreation

□□-11

The hundreds of young people who walk, ride, and skate board in the area daily will see an abandoned construction site as a unique recreational opportunity. The project will become an attractive nuisance, harming a number of visitors.

-Wildfire

□□-1□

Fire risk will remain extreme. No one will be on site. Fires may be started by those using the abandoned structure for untoward purposes, and with winds they spread fast.

-Agricultural resources

□□-1□

With the DDT, medical waste, and other contaminants running off of and seeping down into the ground from the site, a different very harmful ecosystem will be created by the abandoned site, harming plants, gardens, and crops of all types.

-Greenhouse gas emissions

□□-1□

Will continue, if nothing more during the time of demolition or restoration of the abandoned site.

Mr. Nick Meisinger, NEPA/CEQA Project Manager

July 27, 2019

Page Nine

-Land use and planning

□□-1□

The ultimate disaster, a partially constructed abandoned building. Often a haven for those using illicit substances, various land use issues will arise.

-Population and housing

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Abandoned construction sites are havens for the homeless. In fact, BCHD allowed, for many years, a homeless encampment to exist on the very site it proposes to now start to build and then could abandon.

-Transportation

□□-1□

Abandoned sites are often used as “short-cuts”, for example by those walking to Vons. Increased danger of falling into pits, being exposed to toxins, or being struck by inadequately secured structures are impacts which will occur.

-Air quality

□□-1□

Dust will continue to migrate onto Torrance residents with ocean winds (and onto Redondo Beach with Santa Ana winds). But the particulates won't be beach sand. Instead, the winds will bring toxic hazards and airborne pollutants.

-Energy

□□-1□

The abandoned site will leave lines and pipes exposed. The excavation area is on or near Chevron gas pipelines. Multiple risks of greater exposure to toxin leaks or explosions are serious impacts.

Mr. Nick Meisinger, NEPA/CEQA Project Manager
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-Hazards and hazardous materials

□□-□□

See above. The amount and nature of these materials on site is great. The impact of an abandoned site is to disturb them and insure their distribution into our lungs and blood streams.

-Mineral resources

□□-□1

The abandoned construction is over an abandoned oil well.

-Public services

□□-□□

Police, fire and other impacts remain, especially to Torrance, and impacts may be enhanced as the young are hurt interacting with the attractive nuisance, and as crimes increase.

-Utilities and service systems

□□-□□

As noted, water supplies, underground cables, pipelines, electrical lines, and other impacts will no doubt be felt.

Thank you for considering my thoughts.

Very truly yours,

Robert R. Ronne

RS/RS

ROBERT R. RONNE

RRR/

Lamb, Kaylan

From: EIR <eir@bchd.org>
Sent: Friday, August 02, 2019 1:32 PM
To: Meisinger, Nick
Subject: Fw: Healthy Living Campus

From: Steve Saber <backsaber@aol.com>
Sent: Saturday, July 27, 2019 9:57 PM
To: EIR <eir@bchd.org>
Subject: Healthy Living Campus

Dear Mr. Meisinger,

I attended the meeting at West High School and heard your presentation regarding the upcoming report you plan to submit to BCHD and their proposal for the 15 year project slated to begin in the Summer of 2021. I also have personally met with our representative City Council member.

Without repeating the important concerns of the homeowners within the region of this project I have and will be providing support to my fellow neighbors. Our concerns focus on overwhelming traffic and safety issues not to mention zoning laws to be taken up by the City of Torrance. Environmental and biological manifestations that undoubtedly will be uncovered, and the overall size and consequences that will impact us both financially and our quality of life will be detailed for analysis. I will be studying in the next few weeks and reading the reports that have been performed prior to our notifications. I have already seen discrepancies regarding what has been said to us and information from the 2016 400+ page already filed as the Geotechnical Report. □□-1

I have been a resident on Towers Street for 21 years and have enjoyed raising my family here. I do not feel, nor does anyone else, that this project has been fully scrutinized on the impact it has on our district. The City of Redondo Beach has quietly been moving along while the City of Torrance just has replied to us that it is now very much on their radar. We fully intend to put it on target. I am sure we will all be able to work together in a positive manner in order to reduce further conflict both legally and all other ways available to us as a community. □□-□

Thank You,
Dr. Steven M. Saber
Vicki A. Saber, CSR
5607 Towers St.
Torrance CA
90503
Backsaber@aol.com

Sent from my iPad

Comments Regarding EIR for BCHD Healthy Living Campus Master Plan

One area of particular concern that has been heavily discussed is traffic impacts and the NOP has stated that the EIR will assess all aspects of traffic impact. However, over and above increased traffic, is increased parking congestion; specifically, parking for the workers. Once the parking lot is demolished for the new project, there may not be adequate on premise parking, construction workers as well as employees will likely park in the adjacent neighborhoods. What can be done to accommodate these cars? Simply allowing parking in the nearby neighborhoods will create problems especially on street cleaning days. Also, after completion, the addition of 360 assisted living spaces will require more employees from current levels. However, it looks like there will be a reduction in parking spaces (from 814 to 690); this will aggravate an already tight parking situation. This needs to be assessed by the EIR.

□□1-1

The NOP says that the Child Development Center will have curbside drop-off/pick-up. This implies that there isn't short term parking for drop-off/pick-up. However, very few if any parents would drop off their 2 – 5 year old at the curb and have them walk in alone. Also, at the end of the day I would assume all children must be signed out to an approved adult for security reasons; therefore, curbside pick-up will not work. Unless there is a lot of curbside parking there will be high congestion at the curb as parents leave their vehicles to escort their children. The need for short term parking needs to be assessed.

□□1-□

All phases of the project will require hundreds of large trucks coming and going with many potentially going through the Torrance neighborhood. These roads will degrade more rapidly than normal. The cumulative damage on the neighborhood roads should be assessed.

□□1-□

Will there be a period or periods of time in which the Beach Cities Health and Fitness Center is closed during the remodel? If so the will the Fitness Center patrons be given other options? The EIR should capture these impacts.

□□1-□

Everyone is concerned about the impacts that the major remodel project proposed by the Beach Cities Health District will have on their daily lives. It is inevitable that some impact will occur and the EIR will document this. The question is what level of impact is acceptable? In some peoples mind no degradation is the requirement; however, this is not realistic. Some impact is unavoidable. For each impact where does the ultimate authority lie to decide what is acceptable and what is not acceptable? Who decides if impact mitigations are adequate or if project scope changes or design adjustments are required to reduce impacts?

□□1-□

David Sam
20108 Tomlee Avenue
Torrance, CA 90503

Lamb, Kaylan

From: EIR <eir@bchd.org>
Sent: Friday, August 02, 2019 1:34 PM
To: Meisinger, Nick
Subject: Fw: Beach Cities Health District Master Plan Campus NOP/EIR Concerns & Comments

From: susie sam <samsusie1@yahoo.com>
Sent: Sunday, July 28, 2019 4:50 PM
To: EIR <eir@bchd.org>
Subject: Re: Beach Cities Health District Master Plan Campus NOP/EIR Concerns & Comments

I am a Torrance resident that lives in the neighborhood that would be most affected by the proposed BCHD New campus Master Plan). I have several concerns. Some that will be reviewed as part of the EIR and some I am not sure that will be addressed based on what I read on the website. Below are concerns/comments:

1) As a result of construction, heavy trucks will most likely shortcut through the neighborhood to get to and from the worksite for 15 years. This will cause considerable usage/wear and tear on our neighborhood streets. Who will repair the damaged to the roads? □□-1

2) Current parking at the BCHD currently is 814. The proposed amount of parking is 690 spaces. There will be an increase in the number of new workers/visitors since adding assisted living units, community wellness pavillion with public presentation halls, and outdoor meetings spaces. Inevitably, there seems there would not be enough parking and our neighborhood streets will become parked up so that it will be difficult for us to park in our own neighborhood. Is this being reviewed? □□-□

3) West High is also a school that is close to the construction site and should be considered in the environment impact study. I did not see it mentioned in the EIR. □□-□

4) We hear all the construction when homes along Prospect perform short term home improvements since it echos through our neighborhood below. I am concerned that the noise levels will be constant for the duration of the project. Fifteen years is quite a long time to endure construction noise. What will be done to mitigate the noise? □□-□

5) The new assisted living units in phase 2 will be pushed up against the edge that looks directly down into our neighborhood. It may be 60 ft tall but based on where it sits, it will tower 90 feet over the neighborhood. It is a solid building that spans along the current edge of the parking lot. It will block the wind flow into the neighborhood and potentially the lights may directly shine into the neighborhood. These concerns need to be looked at. □□-□

6) Is water runoff during and after construction phase being looked at on how it affects would affect the residents? □□-□

7) We typically do not have air conditioning in the neighborhood and leave our windows open to get the ocean breeze. With construction, I understand that the existing building will be pulverized onsite thus causing significant dust/micro construction material that will can be carried downwind towards our homes. What will be done so we do not experience getting construction pollution into our homes? □□-□

Sincerely,

Susie Sam
20108 Tomlee Ave

Torrance, CA

WRITTEN COMMENT FORM
BEACH CITIES HEALTH DISTRICT
HEALTHY LIVING CAMPUS MASTER PLAN EIR

If you would prefer to submit written comments, please complete this written comment form. Continue on the back of the form or attach extra pages, as necessary.

In order to be addressed in the Draft Environmental Impact Report (EIR), written comments must be received by the close of the public comment period at 5:00 PM on July 29, 2019.

NAME: Mary Caroline Sanjuan

TITLE/ORGANIZATION: Resident of Redondo Beach

ADDRESS: 808 Harkness Ln Redondo Beach CA 90278
(Street) (City/State/Zip)

—COMMENTS—

Why is the central building circular seems to be an illogical choice as well as extremely expensive and space wasting way of building a functional space.

MS-1

Please hand this completed form to Wood staff at the sign-in table or mail to:

Mr. Nick Meisinger, Environmental Planner
Wood Environment & Infrastructure Solutions, Inc.
9210 Sky Park Court, Suite 200
San Diego, CA 92123

Written comments may also be e-mailed to:
EIR@bchd.org

Catherine Bem

From: Santiago Santana <santiana@verizon.net>
Sent: Monday, July 29, 2019 5:04 PM
To: EIR
Cc: OMartinez@TorranceCA.gov; asantana@univision.net
Subject: Beach Cities Health District Healthy Living Campus Master Plan; Torrance Scoping Comments to EIR Initial Study

Mr. Nick Meisinger,

My husband and I have attended a couple of the meetings in regards to the construction of the new Beach Cities hospital and Residential Living project. We moved to West Torrance approximately 11 years ago. We live on Tomlee Avenue, directly below the current Beach Cities complex. One of the reasons why we chose the area was because of the proximity to great schools and the tranquility of the neighborhood. This project threatens to disrupt our neighborhood not only for the 12- 15 years the construction will take place but far beyond that. The fact that the proposed project will take 15 years to be finished is just unprecedented. The disruption that this project will cause and the environmental impact will be felt in Torrance for years to come.

We are extremely concerned about the increased traffic in the area and how this will affect directly the schools in Torrance. Beryl will become a main entrance to thousands of trucks that will be bringing many tons of materials. The children who attend Towers Elementary now will have to deal with constant noise, dust and terrestrial contaminants that are certain to travel downwards to the neighborhood. During the school year, hundreds of parents use Beryl to access Towers Elementary this access will be highly disrupted for 15 years during the construction process. Think about the fact that kids that are barely starting kindergarten will have their entire elementary years impacted by increased traffic, contaminants in the water runoff, dust and other harmful particles released by excavating and the construction in general.

The proposed project also shows the main entrance to parking structures and complex on Flagler Lane. I invite you to go to the area during the school year when you will see many kids using that street to get to Redondo High. How is traffic going to be controlled in that area to ensure the physical safety and health of the many kids walking and biking through there? Our high school will also be highly impacted by the traffic as most students, parents and school personnel use Del Amo as their main way to access the school.

We're also very concerned about the electrical grid and our area and how is that going to affect the neighborhood and schools in general. In the past few years we have seen many new families with younger kids move into this area. This means more computers, TVs, etc. which in turn means more electrical demands.

Other issues have arisen in the meetings we have attended having to do with the impact the dust and materials being released into the air will have in our families. In our area there are many elderly individuals that have been there since the 70's. How is Redondo going to ensure that we're not affected by all the contaminants from the excavations they plan on doing?

We agree with all the many concerns that have been raised but many of our Torrance neighbors that this is a project that will impact our community for years to come and will create much harm to the environment of our community.

Regards,

Santiago and Ana Santana
19445 Tomlee Ave.
Torrance

Lamb, Kaylan

From: EIR <eir@bchd.org>
Sent: Thursday, July 25, 2019 10:26 PM
To: Meisinger, Nick
Subject: Fw: Proposed BCHD Project Local Home owners concerns

From: Lis Schneider <lis3111940@gmail.com>
Sent: Tuesday, July 23, 2019 9:16 PM
To: EIR <eir@bchd.org>
Subject: Proposed BCHD Project Local Home owners concerns

To Whom It May Concern,

I am a local Tomlee resident who is greatly concerned with the health ramifications of the proposed building project. I have COPD and already suffer from breathing problems. The proposed pulverization of concrete and the effect of concrete silicon blown in the air will greatly affect those living near this development project. There are young children in nearby schools and elderly that this has great health ramifications and concerns.

□□-1

Sincerely,
A Concerned Citizen

Sandra Schreyer
19338 Tomlee Avenue
Torrance, Ca 90503
slschreyer@icloud.com

July 26, 2019

Nick Meisinger, Environmental Planner
Wood Environmental and Infrastructure Solutions, Inc.
9210 Sky Park Court, Suite 200
San Diego, Ca 92123

To Whom It May Concern,

I am writing in regard to the proposed modifications to the Beach Cities Health District campus in Redondo Beach, California. I would like the following concerns to be addressed in the Environmental Impact Report.

1. Perform a complete bottoms-up analysis of the # of parking spaces required.
 - A. Start by analyzing the current parking problem. There is not enough parking on campus for the existing businesses. What is the current deficit?
 - B. Analyze the parking requirements for new tenants that will be housed on the campus. For each tenant, how many professionals, support personnel, and customers will be expected at each time of day. Keep in mind that each tenant will experience higher volume at specific times of day.
 - C. Analyze the parking requirements for the senior living units. Take into account the cars that the tenants own, plus parking for their caregivers, their visitors, and support personnel like housekeepers and cafeteria cooks.
 - This will vary by type of senior living unit — independent, assisted, and memory care. Remember that even assisted living seniors can keep their own car.
 - A while ago I looked up the Redondo Beach city planning documents. They said that only one tenth of a parking spot is required for each disabled person. This is insufficient. Adherence to the current city codes is not acceptable.
 - EXAMPLE: A disabled person cared for at home needs 2.2 parking places. Rationale: One full-time parking place is required for the disabled person's car, a second full-time parking place is required for the caregiver's car and a third part-time parking place is shared by the gardener, house-keeper, and personal trainer. Conclusion: More than one parking place is needed for each living unit.
 - Determine the amount of parking needed by people using the gym, attending wellness sessions, and using the childcare center.
 - D. Design your parking structures to accommodate the complete number of parking spaces required, plus an additional percentage to allow for future growth.
2. Once you have a good estimate of the number of cars that will be parked on campus, calculate the additional amount of traffic on neighboring Torrance streets like Flagler, Towers, and Redbeam.
 - A. Will the number of cars per minute cause traffic flow problems in this residential neighborhood?
 - B. Will the amount of traffic be a safety hazard to children crossing the street and entering Towers School by the Tower's Street walkway.

□□-1

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3. Analyze the effect of an entrance/exit to the parking structure on Flagler.

- A. Flagler is one lane wide in each direction. Estimate the number of additional accidents that will occur when cars pull out of the parking lot.
- B. Keep in mind that the neighborhood currently has a problem with cars traveling south of Flagler too fast, missing the left turn onto Towers, and hitting the house on the corner. The cinder block barrier placed in front of the house is there to protect the inhabitants from further accidents.

4. When (not if) the campus parking structure is full, examine the effects of overflow parking on the streets around the campus (e.g., Towers, Tomlee, Mildred, Redbeam)

- A. There is currently insufficient parking in this area when Towers Elementary School gets out in the afternoon.
- B. The parking restrictions on street sweeping days are: no parking on one side of each street on Wednesdays from 10:00am to 1:00pm, and no parking on the opposite side of the street on Thursdays from 8:00am to 11:00am.
- C. How many additional cars will be parking in this neighborhood due to the new facilities at Beach Cities campus?
- D. Analyze the effect on your campus if Torrance initiates a "resident permit parking pass" system to keep campus visitors from parking in Torrance.

5. How will this campus increase air pollution? How much will it raise the coarse particulate matter (dust), and fine particulate matter in the air?

- A. Calculate this for the construction, for each year during the construction.
- B. Calculate this for the additional cars that will be parked in the campus' parking structures and on neighboring streets.
- C. Calculate this for the additional traffic on the streets around the campus, as the visitors circle around, looking for a parking space to become available.
- D. Analyze how this increased pollution will affect the health of people who live on the campus and on neighboring streets.

6. Address the geological risks.

- A. The campus is being constructed on Pleistocene sand dunes. How will your construction prevent soil liquefaction during a major earthquake?
- B. The campus is being constructed on a lot that, as late as the 1970s, contained oil wells. How will you keep the oil from escaping from the capped wells and polluting the surrounding soil?
- C. There are numerous observational studies indicating that people who live near active oil wells have a higher rate of cancer, respiratory illnesses, and other health ailments. Complete a meta-analysis to determine if this conclusion persists when applied to non-active oil wells, like we have on the corner of Flagler and Beryl. Use public health records to determine if there already is a "cancer hot spot" around the campus before construction begins.
- D. How would the soil, and slopes on the campus handle the amount of rain that fell during the winter of 1861 and 1862? Will there be landslides blocking Flagler? How much flooding would be expected in the subterranean parking structures?

7. Address how the proposed campus will greatly increase the urbanization of this area of Redondo Beach. I am concerned with the high density of health-vulnerable people in this area.

- A. What additional peak usage of utilities will be required? Can the local electrical grid handle this, on a hot day when the campus requires the use of air conditioning?

Ramos, Ryan

From: Meisinger, Nick
Sent: Tuesday, August 13, 2019 12:35 PM
To: Meisinger, Nick
Subject: Sandra Schreyer

Sandra Schreyer
sandy_schreyer@yahoo.com

SS2-1 I am extremely concerned about parking for an additional 420 assisted living units. Currently, there is insufficient parking at the Prospect Avenue campus. Adding additional medical offices and living units will exacerbate the existing problem. Where is there a complete, bottoms up analysis of the amount of parking required? Each living unit needs its own parking place, whether they be disabled or not (NOT 1/10 parking place allocated for each disabled tenant, the minimum allowed by law) for their own car, caregivers, personal trainers, visiting nurses and other medical professionals, family, and guests. If there is insufficient parking, the assisted living population will get fewer visitors. Also, the surrounding neighborhood in Torrance will have its street parking taken up by people visiting your facility. NO PARKING LOT ENTRY ON FLAGLER! We already have a traffic flow problem, as evidenced by the barrier in front of the house on the corner of Flagler and Towers. Don't make it worse!

Lamb, Kaylan

From: EIR <eir@bchd.org>
Sent: Thursday, July 25, 2019 10:33 PM
To: Meisinger, Nick
Subject: Fw: Input to EIR for BCHD Healthy Living Campus Master Plan

From: Judy Scott <jscott006@socal.rr.com>
Sent: Wednesday, July 24, 2019 11:11 AM
To: EIR <eir@bchd.org>
Subject: Input to EIR for BCHD Healthy Living Campus Master Plan

Nick Meisinger, Environmental Planner
Wood Environment & Infrastructure Solutions, Inc.
9210 Sky Park Court, Suite 200
San Diego, CA 92123

Dear Mr. Meisinger,

I am writing to express my concerns about the current proposal of the Beach Cities Health District (BCHD) in Redondo Beach for their Healthy Living Campus Master Plan. In their Notice of Preparation dated June 27, 2019, activities are delineated that will result in significant and unacceptable environmental impacts on our Torrance neighborhood.

Flagler Lane has been designated as the single entrance to a planned subterranean garage with 320 parking spaces, which will be expanded in the second phase by 120 additional spaces. The Construction Management Plan calls only for "review and approval by the City of Redondo Beach," but the impact of this structure on Torrance residents will be much greater. This narrow lane is on the western perimeter of our quiet neighborhood and currently is used mainly by people entering or leaving the tract. The plans would create a tremendous increase in traffic, congestion, air pollution, light glare, and noise in this area at all hours of the day and night.

Another area of my concern is the stated plan to pulverize the existing reinforced concrete on site. As a retired chemist, I am acutely aware of the dangers of exposure to respirable crystalline silica dust, which would be generated in enormous amounts. Even with the best practices available, there would be respirable particulate escape. This site is approximately 350' from Towers Elementary School, and the prevailing wind pattern would result in exposure of hundreds of school children to fugitive silica dust and fine particulate matter. The long term health effects of such exposure have been well documented. It is one thing to pulverize concrete at a remote industrial site, but planning such an activity this close to sensitive receptors is unconscionable. The estimated "3500 - 5000 heavy haul truck trips," "950 - 1200 cement truck trips," not to mention additional trips to bring in construction materials, will also contribute to an increase in air pollution for this vulnerable population.

I urge you to consider all of these factors as you prepare your Environmental Impact Report. I would request that I be put on distribution for this report. Thank you.

Yours truly,

Judith A. Scott
19510 Linda Drive
Torrance, CA. 90503
Jscott006@socal.rr.com

Mr. Nick Meisinger, NEPA/CEQA Project Manager

Re: Public Comments on Proposed BCHD Expansion Project"

We are residents of the short Tomlee Ave cul-de-sac across Flagler Ln from the vacant lot (19300 block). The proximity of the proposed construction to our home causes us grave concerns. Our cul-de-sac has 14 homes, 7 of which are occupied by retired senior citizens. One of our neighbors is permanently disabled and several others have respiratory and allergy problems. The excess noise and dust will have health impacts.

Specific concerns:

1. Public safety:

- a. Towers Elementary School has 600 students. The south west entrance on Towers St is right along the proposed construction traffic route. There have already been 4-5 recent accidents on the Redbeam/Towers curve, additional traffic will increase accident risk. The curve is already choked with parents dropping off their children between 8-9AM.
- b. The entrance to our little cul-de-sac would be blocked if there were significant truck traffic on Towers St. As it is, our visibility is very limited to Towers traffic, large trucks would make that worse. Truckers also have a superiority complex and think nothing of blocking intersections for their convenience. Since we have a large number of senior citizens in our neighborhood, we are also very concerned about the ability of emergency vehicles to get to our homes. The noisy trucks with their diesel fumes are objectionable, especially considering the long time frame of this project.
- c. Traffic in general is high in this neighborhood during rush hour due to non-residents using it for a short cut to Beryl St. The stop signs that were installed to regulate traffic flow are largely ineffective because drivers simply do not stop, and we have little enforcement.

2. Parking:

- a. Parking is very limited in our neighborhood. This is made worse on Tuesday for trash pick-up and alternate side parking Wednesday and Thursday for street cleaning. So, 3 of the 5 work days we have only half the full parking available. There will be hundreds of workers required to do the proposed project. Where will they park? A detailed plan is required to prevent our neighborhood from becoming a parking lot.
- b. The entry/exit of the parking garage onto Flagler Ln is a huge safety issue. There is too much traffic during rush hour and school drop off and pick up times to have additional traffic from the proposed child development center which would peak in this same time frame. A far better solution is to rearrange your plans to use Diamond as your parking entrance/exit. It is a little used street with a traffic light on Prospect.

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3. Aesthetics:

- a. Having an 80' structure in our back yard is objectionable. It will be an eyesore and have a negative effect on property values. You think of it as a 60' structure, but it is on a 20' hill from our side. It is very obvious that no consideration for your Torrance neighbors has gone into this plan.

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4. Public Health:

- a. What is the impact to our water supply? How will you ensure no reduction in pressure, contamination or loss of service to our neighborhood which also uses the California Water Service?
- b. It is well known the dust and noise are detrimental to the health of children and senior citizens:

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The National Institute of Health supports this conclusion. Here is a portion of their findings on the hazards of "noise exposure" to the school age population:

"Observational and experimental studies have shown that noise exposure impairs cognitive performance in schoolchildren...in this Review, we stress the importance of adequate noise prevention and mitigation strategies for public health". __Emphasis added.

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<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3988259/>

Not only is noise a documented health hazard, vibrations are frightening as well. In light of recent events, we appear to be in an "active" period for earthquakes after decades of dormancy. Children may easily mistake construction vibrations for a life-threatening earthquake. That could be traumatic to a child in the extreme.

Another impact is particulates (dust and maybe more noxious elements), perhaps in aerosol form, all of which are particularly harmful to the young body.

To make matters worse, the vast majority of the time, the prevailing winds flow directly over the project and onto and over Towers Elementary School, as well as nearby residential units. The influence of those sea driven winds is so pervasive that air pollution and particulates have been discovered and scientifically documented to travel hundreds of miles inland. It is more than foreseeable that whatever air borne materials are generated by the project will travel the hundreds of feet to Towers and residents.

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- c. Dust will be in the air continuously during any major construction activity. Most of us do not have air conditioning and during the hot summer months keep our windows open for ventilation. Your project will force us to close our windows and live in hot homes. This can have serious health effects on the large senior citizen population in the Torrance neighborhood. We will also lose access to our yards during construction times. Who will reimburse us for extra cleaning costs? We get no benefit to justify such extreme inconvenience and health risks.

5. Other concerns:

- a. Every time the vacant lot on the corner of Flagler and Beryl is used our yard becomes infested by rats. What will BCHD do to prevent this?
- b. I operate an Amateur Radio Station. It is against Federal Law to interfere with the operation of any licensed radio station. What measures will you put in place to prevent interference? Radio Frequency noise generated by construction equipment, gym machines and any consumer electronics can be a problem. See 47 U.S.C. § 333 and related regulations.

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In summary, we feel insufficient thought has been given to the serious impacts to the surrounding communities. Your Torrance neighbors are being inconvenienced the most and have nothing to gain from this project. While we appreciate being involved in the planning process we will work with our city government to prevent this development as planned.

Sincerely,

William and Vivian Shanney
19313 Tomlee Ave
Torrance, CA 90503
wshanney@verizon.net

Catherine Bem

From: Cheryl Shenefield <cshenefi@yahoo.com>
Sent: Monday, July 29, 2019 3:08 PM
To: HLCInfo; EIR
Subject: BCHD new campus project

This is a massive project that will create problems with access to the West Torrance neighborhood for way too many years on Flagler. It will impact the safety and access to Students going to Towers Elementary school and require anyone driving in and out of that neighborhood to have to take a lengthy detour to get avoid all the construction. This is not acceptable. In addition, this project is only for the purpose of enterprising on the assisted living part as a money hungry venture with minimal benefit to the local taxpayers of the district. This project is a coverup to hide the money that will be made by the assisted living complex. Currently there are a lot of locals depending on easy access to medical facilities which we will be at a loss of those and the gym are removed forcing persons to get medical services a lot further from home. A better solution would be to rehab and retrofit the current buildings one by one. There is currently no funding secured to build a 350 million dollar project. And no guarentee to be fully funded. Thank you for your time. Cheryl Shenefield West Torrance

[Sent from Yahoo Mail on Android](#)

Lamb, Kaylan

From: EIR <eir@bchd.org>
Sent: Friday, August 02, 2019 1:35 PM
To: Meisinger, Nick
Subject: Fw: Healthy Living Campus Master Plan

From: A <dhowdi@aol.com>
Sent: Sunday, July 28, 2019 8:07 PM
To: EIR <eir@bchd.org>
Subject: Healthy Living Campus Master Plan

Nick Meisinger:

I writing to give a voice to my negative reaction to the above plan which will impact our household at 19710 Linda Drive, Torrance, CA. 90503. My husband and I are both in our 70's and have lived her for 42 years. We like the quiet neighborhood where the air is clean and healthy for us. We both have allergy problems and construction at the above site would definitely affect our well being. The noise with the construction over a 15 year time span would make it unbearable for us. We currently use the Beach Cities Fitness Center so i'm disappointed how this is impacting all of us.

Our daughter went to school at Towers, Bert Lynn and West High School which I'm sure the children attending the nearby school would likely be affected by the construction due to the air quality, noise, etc.

If you have any feedback for us, please email us.

Thank you.

Howard and Diane Shinmoto

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Lamb, Kaylan

From: EIR <eir@bchd.org>
Sent: Friday, August 02, 2019 1:33 PM
To: Meisinger, Nick
Subject: Fw: Concerns regarding BCHD project to Nick Meisinger

From: ckshoda@aol.com <ptshoda@aol.com>
Sent: Sunday, July 28, 2019 1:21 AM
To: EIR <eir@bchd.org>
Subject: Concerns regarding BCHD project to Nick Meisinger

Paula Shoda
19602 Linda Drive
Torrance, CA 90503
July 28, 2019

Nick Meisinger
Environmental Planner
Wood Environment & Infrastructure Solutions, Inc.
9210 Sky Park Court, Suite 200
San Diego, CA 92123

Dear Nick Meisinger:

This letter is to inform you of my concerns regarding the proposed Beach Cities Health District project. It will have a definite negative impact on residents in Torrance, more so than in Redondo Beach, because of its location and design. Adequate notice was not given to Torrance residents in this area to voice their concerns.

Children's safety is of paramount importance. The long-term construction project is merely 75 feet to the east of Torrance residences, and only 350 feet away from Towers Elementary. Children walk along Flagler Alley and Flagler Lane especially before and after school. Residents are aware of this walkway and are careful to avoid these distracted pedestrians, but traffic currently is light there. The proposed subterranean parking garage has a capacity of 199 cars. If they put the proposed parking entrance at Flagler Lane, they will drastically increase traffic here and through the adjacent residential area. This planned entrance is already recognized in the report as a possible source of hazardous conditions from causing traffic lanes to operate above capacity. Currently, the entrance to the Bay Cities businesses is along Prospect. The project will put children and other pedestrians at risk and subject our quiet residential neighborhood to dangerous business traffic. Keep the traffic on Prospect, where it is at present. The project would also add obtrusive light and glare from almost 200 passing cars to nearby homes, decreasing the residents' quality of life. If the parking lot fills up, business patrons may take up residential street parking in front of homes, as well.

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The close proximity of the proposed construction to Towers Elementary and Torrance residences is alarming, considering the long list of hazards in the report. 15 years of increased exposure to air pollutant emissions seem unsafe, unreasonable, and unfair. Oil, gas, benzene, asbestos, lead... prolonged exposure to our residents, especially our vulnerable developing children, is not right. I trust that Beach Cities will guarantee to compensate residents for any injuries from these chemicals, as well as damages caused by landslides or earthquakes during and following the construction project, since they list these as potentially significant risks. Asking residents and their children to bear 15 years of noise and vibration from heavy equipment is too much. How can our children function at school with all these distractions? How can we rest in our own homes? The negative impact this proposed project will have on our lives is irreparable.

Thank you for your prompt attention to this matter.

Sincerely,

Paula Shoda

Lamb, Kaylan

From: EIR <eir@bchd.org>
Sent: Friday, August 02, 2019 1:38 PM
To: Meisinger, Nick
Subject: Fw: Beach Cities Healthy Campus

From: Janet Smolke <jsmolke@gmail.com>
Sent: Monday, July 29, 2019 10:56 AM
To: EIR <eir@bchd.org>; HLCInfo <HLCInfo@bchd.org>
Subject: Beach Cities Healthy Campus

There are many concerns regarding the building of this campus.

1. The project is too big for the area and the time schedule is too long. It is wrong to have such a huge project so close to schools, parks, and residential areas. All the dust created by this project will be a health hazard for those who live in the vicinity and want to live a "healthy life" in their own community.

2. The project funding plan seems tenuous at best. The current CEO says they have \$26 million in reserves to use as a down payment and for about 6 months of operating costs with the total cost of \$530 million. The remaining cost will be obtained through a partnership with the operator of the assisted living facility and through some bond or borrowing plan. This doesn't sound like good planning financially with the "maybe" factor of where the money is coming from. After about 6 months there is currently no guaranteed funding.

3. Truckloads of debris containing hazardous dirt and building materials will be traveling our streets for 15 years. How can this be allowed? The nearby residents have to endure this for 15 years. Can you see the irony in this plan? The health risks that will be imposed on the residents for 15 years to build something that is suppose to be for "healthy living?"

4. The subterranean parking structure shows the entrance on Flagler. It doesn't say where the exit is, but it is most likely at the same location. This would increase traffic through the nearby Torrance neighborhoods. Available parking on site will be less than what the area currently has. If there is not adequate parking than street parking will increase around the campus and in residential "Torrance" neighborhoods.

5. Another concerning issue is that since this is a Beach City Campus, Torrance residents will be able to use the facilities only on a limited basis. Assisted living and elder care facilities would go first to residents of Hermosa Beach, Manhattan Beach and Redondo Beach. My thought is that since it is mostly for beach city residents, but the inconvenience of the building process and traffic problems will have a major impact for Torrance the project should be scaled down.

6. The traffic congestion on nearby streets like Beryl and 190th seems to indicate that these roads are near maximum usage. Imagine the impact on our streets with the addition of continuous truckloads of debris, delivery of building materials, workers, etc. will have. Also the damage from the heavy equipment traveling daily on the streets will cause our roads and highways to deteriorate at a faster rate.

In conclusion, the impact of this project on the surrounding neighborhood is too great for any benefits that may never be realized. I recommend that the project be scaled back to match the community it is in or build it somewhere else in the beach area.



Janet Smolke



Virus-free. www.avast.com

Ramos, Ryan

From: Meisinger, Nick
Sent: Tuesday, August 13, 2019 12:34 PM
To: Meisinger, Nick
Subject: Joseph Sonandres

Joseph Sonandres
joe@calcoastophthalmic.com

JS-1 | We are homeowners on Tomlee Ave since 2003 . Our concern will be the impact on our daily lives that includes noise, air quality, traffic, access to our own neighborhood, and property value impact over the next several years.

Ramos, Ryan

From: Meisinger, Nick
Sent: Tuesday, August 13, 2019 12:37 PM
To: Meisinger, Nick
Subject: Ruby Sonandres

Ruby Sonandres
rsonandres@yahoo.com

Hello,

I am a resident on Tomlee Ave in Torrance where I enjoy the quiet neighborhood atmosphere . Recently it has come to my attention your BCHD project. I am very concerned about the environmental issues that a project of this magnitude will have on my neighborhood. Not only could it bring down the value of my property, it could possibly effect my health. A project taking so much time to complete could have long term effects as far as the air quality is concerned.

RS-1 The local school, Towers Elementary, could perhaps start seeing more children at risk, especially those with health concerns such as asthma. The poor air quality as well as debris in air will cause all neighbors not only excess dust but possible health issues.

RS-2 I am also concerned with the flow of traffic that could effect my quiet neighborhood with patients cutting through a residential area to get to the facility. Putting your main entrance to underground parking on Flagler is a disaster just waiting to happen. Creating a makeshift bike lane is no remedy for this debacle. Putting main traffic in a residential area is simply NOT fair to local residence.

As a concerned citizen and neighbor I look forward to you finding solutions during your environmental impact statement.

Thank you,

Ruby Sonandres

Lamb, Kaylan

From: EIR <eir@bchd.org>
Sent: Friday, August 02, 2019 1:32 PM
To: Meisinger, Nick
Subject: Fw: Public Comments on Proposed BCHD Expansion Project

From: D&N <stffieri@hotmail.com>
Sent: Saturday, July 27, 2019 9:10 PM
To: EIR <eir@bchd.org>
Cc: OMartinez@torranceca.gov <OMartinez@torranceca.gov>
Subject: Public Comments on Proposed BCHD Expansion Project

Dear Mr. Meisinger,

We are proud West Torrance homeowners who reside on Tomlee Avenue. We live in a charming, quiet family neighborhood with beautiful ocean breezes. This has always been the draw for residents who move and stay here. We continue to enjoy and appreciate our small cul-de-sac. Our cul-de-sac is also located behind Flagler Lane, directly behind the proposed Beach Cities Health District Expansion Project. We have grave concerns regarding the impact of the short-term (10-15 years) construction and the long-term consequences of the enormity of the proposed project. As a result, this letter serves as our public comments regarding this proposal.

Specific concerns:

1. Traffic and Safety - The current plan includes a single ingress and egress for a parking structure on Flagler Lane which is located in the city of Torrance (not Redondo Beach). This would result in major traffic and safety risks for local residents due to the significant number of construction vehicles which would literally be in our backyards. The visibility in attempting to exit our street onto Towers (whether to turn east on Towers or curving right onto Flagler Lane) is already extremely limited. The volume of construction vehicles for the next 10-plus years as well as the increased traffic for cars attempting to access the BCHD parking structure will most definitely result in accidents. In addition, there is an entrance to Towers Elementary School just down the hill on Towers Street where parents pick up and drop off their children Monday through Friday. As it currently stands, many drivers who drive south on Flagler Lane and head east on Towers do not stop at the stop sign which is where many of the families are attempting to cross. This situation will only become worse as this street will become a major thoroughfare for a business. We are a neighborhood of single family homes, not a business route. What consideration was given to establishing an ingress and egress on Prospect Avenue or Diamond? Both of these streets already have traffic signals in place which is surely a safety and preventive measure. It seems that these viable options should be considered given that they are both roads that belong to the city of Redondo Beach. It is beyond our understanding why Torrance residents should suffer the negative impact of the expansion project for the benefit of the beach cities (of which Torrance is not included).

2. Health and Quality of Life - Good health is of utmost concern to everyone, including the residents of our neighborhood. The demolition of the existing buildings and lots as well as the construction of the planned parking structure (over the next 10-plus years) will result in significant dust and unforeseen chemical particles entering our homes, yards, and water. This will be especially harmful to the young children and senior citizens in our neighborhood. Additionally, what will happen when the vacant lot is developed and the rodents find alternate "homes" nearby in our own homes? Has BCHD taken this into consideration? We are currently experiencing very hot weather. In the short term (it is difficult to comprehend that 10 years is considered "short term"), we will have to keep our doors and windows closed all day during the excessive heat just to keep out the dust and fumes from the development. In the long term, we will lose that clean, healthy ocean breeze (an important consideration for many of us who bought in this development) due to the proposed size of the parking structure.

We understand the business of doing business. The BCHD plan will benefit many residents in the beach cities communities (Redondo Beach, Manhattan Beach, Hermosa Beach). However, we strongly object to the plan for a single ingress/egress on Flagler Lane in West Torrance. This proposed expansion project, specifically the ingress/egress plan, provides no benefits to West Torrance residents and results in only negative ramifications. West Torrance residents should not be negatively impacted by this aspect of the project when there are other, more viable options to consider.

Thank you for your consideration in this very important matter,
David and Nancy Staffieri (proud West Torrance homeowners)
19302 Tomlee Avenue
Torrance, CA 90503

Lamb, Kaylan

From: EIR <eir@bchd.org>
Sent: Friday, August 02, 2019 1:26 PM
To: Meisinger, Nick
Subject: Fw: Proposed BCHD Expansion Project

From: Joyce Stauffer <jostauffer@verizon.net>
Sent: Friday, July 26, 2019 6:07 AM
To: EIR <eir@bchd.org>
Cc: PFurey@torranceca.gov <PFurey@TorranceCA.Gov>; GChen@torranceca.gov <GChen@TorranceCA.gov>; GRizzo@torranceca.gov <GRizzo@TorranceCA.Gov>; TGoodrich@torranceca.gov <TGoodrich@TorranceCA.Gov>
Subject: Proposed BCHD Expansion Project

Nick Meisinger, Environmental Planner
Wood Environment & Infrastructure Solutions, Inc.
9210 Sky Park Court, Suite 200
San Diego, CA 92123

Dear Mr. Meisinger,

We are writing to express our concerns about the current proposal of the Beach Cities Health District (BCHD) in Redondo Beach for their Healthy Living Campus Master Plan.

We are original owners (since 1969) of our property on Linda Drive in Torrance. We have seen many changes during that time resulting in the neighborhood becoming one of the most desirable areas to live in. We raised our children here and plan to spend our retirement years here. We believe activities delineated in BCHD Notice of Preparation will result in significant and unacceptable environmental impact on our Torrance neighborhood.

Flagler Lane has been designated as the single entrance to a planned subterranean garage with an overall total of 440 parking spaces. The Construction Management Plan calls only for "review and approval by the City of Redondo Beach," but the impact of this structure on Torrance residents will be much greater. This narrow lane is on the western perimeter of our quiet neighborhood and currently is used mainly by people entering or leaving the tract. The plans would create a tremendous increase in traffic, congestion, air pollution, and noise in this area at all hours of the day and night, especially endangering the children who walk to and from school each day. The traffic on Towers and Redbeam is already heavy. This plan would increase the traffic to an extremely dangerous level. We believe a more feasible plan would be to place the parking structure entrance/exit on Beryl or Prospect, much larger streets, and better able to handle the traffic. This change would reduce street traffic through our neighborhood.

Another area of my concern is the stated plan to pulverize the existing reinforced concrete on site. We are aware of the dangers of exposure to respirable crystalline silica dust, which would be generated in enormous amounts. Even with the best practices available, there would be respirable particulate escape. The health risks of the BCHD project fall squarely on the young and our aging population. This site is approximately 350' from Towers Elementary School, and the prevailing wind pattern would result in exposure of hundreds of school children to fugitive silica dust and fine particulate matter. The long term health effects of such exposure have been well documented. It is one thing to pulverize concrete at a remote industrial site, but planning such an activity this close to sensitive receptors is unconscionable. The estimated "3500 - 5000 heavy haul

truck trips," "950 - 1200 cement truck trips," not to mention additional trips to bring in construction materials, will also contribute to an increase in air pollution for this vulnerable population.

We urge you to respect and preserve our neighborhood as you prepare your Environmental Impact Report.

Joyce and John Stauffer
19411 Linda Drive
Torrance, CA 90503

Cc:
Patrick Furey, Mayor, City of Torrance
Tim Goodrich, Councilmember
Geoff Rizzo, Councilmember
George Chen, Councilmember

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BRUCE AND TERESA STEELE
19420 REDBEAM AVENUE
TORRANCE, CA
310-780-0343

July 18, 2019

Mr. Nick Meisinger
Environmental Planner
Wood Environmental & Infrastructure, Inc.
9210 Sky Park Court, Suite 200
San Diego, CA 92123

HAND DELIVERED

Dear Mr. Meisinger,

Enclosed please find our comments on the Initial Study which accompanies the Notice of Preparation of the Environmental Impact Report to be prepared in connection with the Beach Cities Health District Healthy Living Campus Master Plan.

We would appreciate the opportunity to access all comments submitted by all interested parties in connection with the Initial Study, the NOP, and the EIR.

If you have any questions regarding our comments, please do not hesitate to contact us.

Yours truly,

Two handwritten signatures in blue ink. The first signature is on the left and the second is on the right.

Bruce and Teresa Steele

Beach Cities Health District Healthy Living Campus Master Plan

Environmental Impact Report Scoping Comments

The following are comments on those areas of the NOP where it is believed that additional or further analysis is required by the Draft Environmental Impact Report. However, as a general observation,

(1) The scope of the EIR should take into account that the proposed Project may also be subject to the policies of the City of Torrance Strategic Plan and other applicable City plans, regulations, and policies, pursuant to CEQA Guidelines §15125(d),

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(2) It would be helpful to have an explanation of why a separate EIR need not be completed for Phase 3, which is not scheduled to begin, at the earliest, until the Summer of 2030. It is possible that many conditions, laws, regulations, ordinances, zoning, density, resident needs, traffic patterns and the environment will have changed considerably in the intervening years, and

(3) There should be a clarification in the EIR regarding the proposed Flagler Lane entrance/exit. At a number of places in the NOP it is described as either "potential" or "actual". This is critical as the answer will probably have a great impact on the neighborhood east of the Project site. Consequently, the EIR should discuss different alternatives to reduce or eliminate through traffic, parking, noise, and pollution to the Torrance Neighborhood arising from that entry and exit. Such alternatives might include traffic diversion features on Flagler Lane toward Beryl Street, as well as through traffic reduction or elimination barriers which have been used on other Torrance roadways.

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Wood Project Site Figure 2 (NOP p. 8)

The Boundary Legend showing Flagler Lane within the City of Redondo Beach is incorrect. It is in the City of Torrance. However, the Boundary Legend showing the demarcation line between the Cities of Redondo Beach and Torrance in the Flagler Alley appears to be correct. This is likely an oversight in the NOP as BCHD is aware of the actual Boundary.

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Existing Site Access And Circulation (NOP p. 10-12)

The description of Beryl Street is incorrect and incomplete. To the west of Flagler Lane, Beryl is a one-lane street going west to Prospect with two left turn lanes. However, going east from Prospect it is a two-lane street to Flagler Lane, becoming a right turn only lane at Flagler. There should also be a description stating that Beryl narrows east of Flagler Lane to a two-lane road with Class II bike lanes on each side of the roadway. While it may not technically be within the "four corners" of the Project site, much of the analyses in the EIR would include that part of Beryl Street east of Flagler Lane, e.g., Significant Environmental Resource Area: Recreation (NOP p. 25) and Significant Environmental Resource Area: Transportation (NOP pp. 60-61). If the truck haul route runs through Beryl from 190th Street it will create a serious traffic issue because this is a heavily used roadway, particularly during morning/evening commutes and school time drop off/pickup times. This roadway goes by Towers School.

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Significant Environmental Resource Area: Recreation (NOP p. 25)

Pedestrian and cyclist routes will be affected depending on haul truck routes and street and alley closures, e.g., the Beryl bike lanes. Therefore, the Recreation box should be checked to indicate that this is an Environmental Resource Area Potentially Affected by the Healthy Living Campus Master Plan. BCHD should determine the level of potential impact and the EIR scope for this Area should include a study of pedestrians, students, and cyclists traveling on roadways from the east of the Project site.

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Significant Environmental Resource Area: Aesthetics (NOP pp. 26-28)

There should be a full description of use, storage location, and length of time of the heavy construction equipment and building materials within the Project site. Additionally, the location, size and length of time of the construction zone fencing should be described, consistent with RBMC § 9-1.16.

According to the Wood Project Site Figure 5 (NOP p. 17) there appears to be open space with trees at the corner of Flagler and Beryl, potentially providing a noise buffer between the Child Development Center and the residential neighborhood to the east. This will be a desirable feature of the Master Plan.

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The EIR should state that, unlike the existing buildings (some of which may reach 75 ft in height), the RCFE building to be constructed will be placed almost at the edge of the Campus property line and will wrap around the northern, eastern, and southeastern boundaries of the Project site, rising 90 ft above Flagler Lane and Flagler Alley. This height does not include the projections for the permitted elements (e.g., elevator shafts, stairs, solar panels, etc.). Height flags should be installed to give Torrance and Redondo Beach residents a visual site line of the proposed buildings for the entire Project site.

Significant Environmental Resource Area: Air Quality (NOP pp. 31-33)

It would be helpful to answer the question of how an accurate pollution emissions analysis can be currently accomplished given the projected 15-year term of the Project and potential changes in the measurement criteria. The EIR should assess the pros and cons of this proposed pollution projection.

The EIR should determine the extent that Sensitive Receptors surrounding the Project Site are subject to prevailing winds and breezes. For example, the Torrance neighborhoods and Towers Elementary School to the east of the project site are subject to onshore breeze and wind, beginning early in the morning and continuing at varying intensities throughout the day and into the evening. This condition continues throughout the year.

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Since the Child Development Center will be developed during Phase 1 the EIR scope should expressly include the children who use the Center as Sensitive Receptors who will be very close to the Phase 2 and, later Phase 3, construction.

Significant Environmental Resource Area: Hazards and Hazardous Materials (NOP pp. 45-48)

Is there more to say in the EIR about the possibility of encountering additional unknown contamination during the excavation of the campus?

Is there more to say in the EIR about the possibility of encountering Asbestos-containing Materials before demolition of the buildings on the campus?

Because Towers Elementary School is within .25 mile of the Project Site, that school should be expressly included, along with the Redondo Beach schools, in the assessment of impacts on hazardous materials sensitive receptors, including potential impacts related to demolition and transport. Furthermore, the Torrance Unified School District should be questioned to determine whether additional schools are planned close to the Project site through the projected end of the Project construction.

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See comment on Significant Environmental Resource Area: Air Quality (NOP pp. 31-33) for a discussion of the Child Development Center.

See comment at Significant Environmental Resource Area: Public Services (NOP pp. 57-58) for comment on responder travel routes and restrictions in the emergency response and evacuation plans.

The Construction Management Plan should be expanded to include the proposed locations of construction worker and RCFE employee parking, as well as likely commuting routes (including routes from the south and east) to and from the Project Site and the Campus both during and after construction. This should be included in the proposed EIR Traffic Study.

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See comment on Significant Environmental Resource Area: Transportation (NOP pp. 60-61) for further discussion of this issue.

Significant Environmental Resource Area: Hydrology and Water Quality (NOP pp. 49-51)

The Storm Water Pollution Prevention Plan (SWPPP) should include the Water Service to the Torrance neighborhoods close to the project site. Also, the Torrance neighborhoods should be included in the Water Quality Management Plan (WQMP) required at the end of construction.

The EIR should include a study of the effect of potential pollutant carrying stormwater runoff on surrounding neighborhoods, including Torrance, during and after the construction process.

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The EIR should state that compliance with the required NPDES permit should include the adjoining neighborhoods downslope from the Project site.

As an adjunct to this analysis, the Campus Stormwater Capture System's goal of reducing the overall stormwater runoff from the Project site should ensure no off-site escape of stormwater, expressly including the 14,000-cy proposed rainwater storage area in the converted basement of the Beach Cities Health Center area.

Significant Environmental Resource Area: Land Use and Planning (NOP p. 52)

The EIR should include an analysis of whether the proposed use of Flagler Lane and Flagler Alley in connection with the proposed Project is subject to the policies of the City of Torrance Strategic Plan and other existing adopted policies, plans and regulations. The EIR should also state that such use is consistent with them.

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Significant Environmental Resource Area: Noise and Vibration (NOP pp. 54-55)

The EIR should clarify that its quantification and analysis of noise generated from current operations and future operations of proposed uses on-site will include testing of surrounding residential areas, parks and schools. The detailed modeling of noise sources, including airborne noise, groundborne vibration, and attenuation should also include those surrounding residential areas. See comment on Significant Environmental Resource Area: Air Quality (NOP pp. 31-33) for a discussion of the Child Development Center.

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Significant Environmental Resource Area: Population and Housing (NOP p. 56)

The EIR should clarify what is meant by "Following implementation of the proposed BCHD... Master Plan, 420 units would be available to residents of the Beach Cities *and surrounding communities.*" [Italics Added] Many of the residents of the nearby Torrance neighborhood are now elderly, having lived there since the neighborhood was developed in the late 1960s or early 1970s. In view of their close proximity to the lengthy construction contemplated at the Project site it would be very desirable for residents to be given a nearby assisted living opportunity. Therefore, the EIR and subsequent Master Plan should specify that Torrance residents would have an equal opportunity to reside in these assisted living units when the units become available from time to time.

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The EIR should include the basis for its statement that “no new roads” would be required. It is possible that new roads may be required, not only to provide access to the Project site but also to reduce the traffic burden on neighborhood residents, consumers, and other users of the Redondo Beach and Torrance roadways. This traffic burden is likely as a result of the Project site construction impacts over the 15 year period, as well as the period beginning with the completion of Phase 1 where employees, CHF users, assisted living resident friends/families, other visitors to the Campus, and delivery vehicles use the roadways leading to the Campus from all directions.

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Because EIR is proposing a new vehicle entry and exit to and from the Campus along Flagler Lane it is quite likely that it will bear the most burden of vehicle traffic at least during the first two Phases of the Master Plan. Therefore, the EIR should discuss different alternatives to reduce or eliminate noise, vibration, and pollution to the Torrance Neighborhood arising from that entry and exit.

Significant Environmental Resource Area: Public Services (NOP pp. 57-58)

There should be a clarification in the EIR that the emergency response and evacuation plans will not involve the use of Torrance residential neighborhood roadways directly east of the Campus (e.g., Towers Mildred, and Redbeam streets). Further, a statement should be included clarifying that if a Flagler Lane entrance/exit is included in the Project, beach cities emergency responders will be required to only use the Beryl roadway to access 190th street or other roadways that it intersects to access the BCHD Campus and the RCFE buildings. There should also be a statement of compliance with California Fire Code § 503

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Significant Environmental Resource Area: Transportation (NOP pp. 60-61)

It is understood that the EIR will include a Traffic Study of the areas surrounding the Project Site, including the traffic in the adjoining Torrance neighborhoods. It is critical that the traffic study include a physical traffic count throughout the day, using temporary vehicle traffic counters on the Torrance neighborhood roadways, expressly including Mildred, Redbeam, Deelane, and, possibly, Norton between Mildred and Redbeam as these roadways are experiencing a significant increase in cut through traffic.

The EIR should also include a discussion and analysis of the safety issues that can result from the increase in traffic, particularly including large trucks, resulting from the Project. This should include specific ways to reduce the potential for vehicle, pedestrian, and cyclist injuries resulting from the increased traffic.

Because Beryl Street and these neighborhoods are burdened by parents dropping off/picking up Towers Elementary School students it is important that the Traffic Study be conducted during the school year which begins August 26, 2019 for Torrance schools and August 21, 2019 for Redondo Beach schools.

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The same timing as stated above also applies to the Child Development Center. There should be an indication where the Child Development Center drop off/pick up area will be located and the EIR should describe the potential impact on the roadway where this area will be placed.

Because EIR is proposing a new vehicle entry and exit to and from the Campus along Flagler Lane the EIR must clarify that its reference to “on-street parking spaces” indicates that it will assess the potential impacts of parking by construction workers and RCFE/BCHD employees traveling to the Project site as well as construction vehicles and equipment and construction materials deliveries to the area.

The analysis should also take into account the likelihood that RCFE/BCHD employees, Center for Health and Fitness users, RCFE residents and families may find it convenient or necessary (particularly when the Campus parking structure is full or before it is completed) to park in the adjoining Torrance residential neighborhood.

This is in addition to the study of required temporary lane closures, sidewalk closures, and the potential conflicts with vehicles pulling out of surrounding residential neighborhoods. The EIR should also determine the impact of the foregoing on pedestrians, cyclists, students and other existing users of Flagler Lane and Flagler Alley during the 15-year construction project.

See comment at Significant Environmental Resource Area: Recreation (NOP p. 25) for further discussion of this issue.

See comment at Significant Environmental Resource Area: Public Services (NOP pp. 57-58) for comment on responder travel routes and restrictions in the emergency response and evacuation plans.

Because EIR is proposing a new vehicle entry and exit to and from the Campus along Flagler Lane which is in the City of Torrance, the scope and methods of the Project-specific Traffic Study and associated EIR analysis must be made with direct input from both the City of Redondo Beach and the City of Torrance.

Furthermore, the proposed new vehicle entry/exit on Flagler Lane is very likely to bear the most burden of vehicle traffic to and from the RCFE Building, the Center For Health and Fitness, the BCHD Offices, and the Child Development Center, at the very least during the first two Phases of the Master Plan. Therefore, it is extremely important that the EIR explore different alternatives to reduce or eliminate through traffic, parking, noise, and pollution to the Torrance Neighborhood arising from that entry/exit. Such alternatives might include traffic diversion features on Flagler Lane toward Beryl Street, as well as through traffic reduction or through traffic elimination barriers, which have been used on other Torrance roadways.

Significant Environmental Resource Area: Mandatory Findings of Significance (NOP pp. 65-66)

The EIR must assess whether the proposed BCHD Healthy Living Campus Master Plan can be completed in less time than the proposed three 36-month-long construction phases. This lengthy period will impose an aggregate of 15 years of intermittent major construction activities on the surrounding neighborhoods of Redondo Beach and Torrance. The potential operational impacts – including but not limited to impacts related to aesthetics, air quality, biological resources, hazards and hazardous materials, greenhouse gas emissions, noise and vibration, transportation and traffic, etc. – may outweigh the long-term benefit if it damages the health of the surrounding residents, particularly the elderly, children, and those with health issues such as asthma, i.e., the Sensitive Receptors.

The operation of heavy equipment during construction will generate noise both on- and off-site. Given the phased implementation of the proposed Project, elevated noise levels would be produced over each of the three 36-month-long construction phases. Given the proximity of surrounding residential areas as well as proximity of residences along potential haul truck routes (i.e., as close as 20 feet from the existing paved roadway width), the noise generation during each of these phases could result in potentially significant impacts. For example, the vacant Flagler Lot, which would be developed as a Child Development Center, is located approximately 75 feet from the nearest residence across Flagler Lane. Towers Elementary School, Beryl Heights Elementary School, and Redondo Union High School are also located in close proximity to the Project site. Given the proximity of adjacent development and Sensitive Receptors, construction activities, particularly along the margins of the Project site, could also result in potentially significant groundborne vibration impacts. Additional on-site Sensitive Receptors that would be sensitive to noise and vibrational impacts would include the existing 60 memory care units in the Beach Cities Health Center as well as the other medical uses within the existing campus. Further, given the volume of grading/excavation, heavy haul trucks and/or materials delivery trucks could result in potentially significant off-site noise and vibration impacts.

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Teresa Steele
19420 Redbeam Avenue
Torrance, CA 90503

Attention: Mr. Nick Meisinger, NEPA/CEQA
Project Manager

Subject: Public Comments on Proposed BCHD Expansion Project

Dear Mr. Meisinger:

I am Pacific South Bay community property owner. My husband and I moved to this wonderful neighborhood five years ago this August 3rd. I am submitting my concerns about the proposed BCHD project referenced above.

TRAFFIC

BCHD's plan to have the Egress/Ingress on Flagler (Torrance property) is a blatant attempt to keep Redondo Beach citizens from complaining about traffic on Prospect; where it should be and is currently. The traffic in our neighborhood is already a major concern. When we purchased our home here, we had no idea that our street and overall neighborhood was a cut through for vehicles coming from Del Amo going North to Beryl or from Beryl going South. In the last two years traffic through our neighborhood has easily doubled. In 2015 we lost our legally parked Tundra to four 18-year-old girls who were taking 4-20 seriously (they threw their bong under our truck). The driver drove into the back of our truck without breaking. Had my husband been unloading the back of the truck at this time he most certainly would have been killed. This is just one of at least 6 accidents that have happened on Redbeam alone since we moved in only 5 years ago.

There is a downhill grade of between 9-10% going south on Towers which turns onto Redbeam. A good percentage of cut through drivers run the stop sign prior to the turn which creates a very dangerous 90-degree blind curve. One rainy night a cut through driver didn't make the turn and ended up in our neighbor's yard. Had her daughter not just driven away she would have been hit. One of these days we will have a head on collision resulting in a death. Hopefully it won't come to this before Flagler will be closed to through traffic going south!

The EIR must assess the impact on our Torrance neighborhood east of the proposed project. There should be a traffic study that includes physical traffic counters. The EIR should assess how these streets can handle the increased traffic or find that this significant impact can't be remediated.

HEALTH

The idea that this project is deemed a Healthy Living Campus seems ludicrous when considering what the demolition will contribute to our neighborhood. We currently have a wonderful ocean breeze which will certainly bring all the dirt, dust and contaminants our way. I have asthma and get a weekly allergy shot. I know of elderly people in the neighborhood with COPD. Children at Towers Middle school will be put at risk as well. The scope of the EIR should be expanded to include an assessment of the need to burden the health of the surrounding neighborhoods in both Torrance and Redondo Beach to benefit the Beach Cities as a whole.

Thank you for your consideration of this very important matter.

T□-1

T□-□

Sincerely, Teresa Steele

WRITTEN COMMENT FORM
BEACH CITIES HEALTH DISTRICT
HEALTHY LIVING CAMPUS MASTER PLAN EIR

If you would prefer to submit written comments, please complete this written comment form. Continue on the back of the form or attach extra pages, as necessary.

In order to be addressed in the Draft Environmental Impact Report (EIR), written comments must be received by the close of the public comment period at 5:00 PM on July 29, 2019.

NAME: Jim STICKLER

TITLE/ORGANIZATION: _____

ADDRESS: 620 N. IRENA REDONDO BEACH, CA 90277
(Street) (City/State/Zip)

—COMMENTS—

Bicycle access to the campus is on Prospect Ave. Prospect does not have a bicycle lane, it is a dangerous high speed road. Please consider creating space for a bicycle lane on Prospect.

□□-1

Please hand this completed form to Wood staff at the sign-in table or mail to:

Mr. Nick Meisinger, Environmental Planner
Wood Environment & Infrastructure Solutions, Inc.
9210 Sky Park Court, Suite 200
San Diego, CA 92123

Written comments may also be e-mailed to:
EIR@bchd.org

WWW.BCHD.ORG/EIR

Lamb, Kaylan

From: EIR <eir@bchd.org>
Sent: Friday, August 02, 2019 1:54 PM
To: Meisinger, Nick
Subject: Fw: Regarding BCHD construction project

From: ellaine derayunan <ejsder@yahoo.com>
Sent: Monday, July 29, 2019 3:23 PM
To: EIR <eir@bchd.org>
Cc: HLCInfo <HLCInfo@bchd.org>
Subject: Regarding BCHD construction project

To Whom It May Concern,

My family is one of the thousands that will be affected by this project. Our child goes to Towers Elementary School and he bikes around this area of our neighborhood. I'm sure I'm not the only one expressing concern about the pollution that will be created by this construction project spanning 15 years!

□T-1

The scope of this venture will affect our neighborhood and children for years. My sister has asthma, and a lot of my friends' kids. Creating that underground parking structure will in itself, spew all these pollutants and possible harmful chemicals in the air that we will breathe for years. Plus the fact that the trucks and construction machinery that will be going up and down the street creating their own traffic, pollution and confusion in this area where our children goes to school.

□T-□

I beseech you to stop this project as the risks are greater than the benefits it advertised. Please listen to the voice of the people.

Sincerely,
Ellaine Tefft
(Concerned neighbor and Mother)

[Sent from Yahoo Mail for iPhone](#)

Lamb, Kaylan

From: EIR <eir@bchd.org>
Sent: Friday, August 02, 2019 1:34 PM
To: Meisinger, Nick
Subject: Fw: Comments regarding the BCHD Living Campus Master Plan EIR

From: April Telles <afrosttelles@yahoo.com>
Sent: Sunday, July 28, 2019 7:11 PM
To: EIR <eir@bchd.org>
Subject: Comments regarding the BCHD Living Campus Master Plan EIR

28 July, 2019

To whom it may concern, regarding the BCHD Living Campus Master Plan EIR

1) First let me say that my main concern is the sheer size/height/design of the outside wall of the main (assisted living) structure. At the scoping meetings the diagrams suggest that the height is 60 ft from grade but given much of the property is on a hill this could mean that a structure could be a height of 100 ft above the adjacent streets. This will block airflow and sight lines of any properties within several blocks of the new campus. You may have one currently existing structure that is 75 ft high from grade but that is very different than this structure which runs along much of the outside perimeter of said property.

- Aesthetically, it does not integrate well into the surrounding neighborhood.
- It will block air space/flow and cast significant shadows
- Energy - I'm sure there are certain building energy standards that will be adhered to such as use of LED lighting. Beyond that I suggest the property integrate solar panels to reduce energy usage and especially fossil fuels.

2) Your flyer states approx 420 units (360 assisted living, 60 for memory impaired) to accommodate approximately 450-545 residents. I saw no estimates for staff employed on the premises nor visitors to residents or for classes, daycare, etc. As with item 1) above the impacts are mostly due to the sheer size. It is too big for the area!

Significant Impacts:

- Parking. It doesn't sound like the planned parking spots (reduced from 800+ to less than 700) will be sufficient. I currently have trouble parking on the property at peak times.

- Traffic congestion and Circulation - Multiple Traffic studies need to be conducted at peak times and on both weekdays and weekends

- Air Quality & Green House Gas (GHG) Emissions - Given the increased traffic, and especially if cars are idling, the fossil fuel fumes will contribute to green house gas emissions and air pollution. This is an obvious contributor to climate change and will also negatively impact anyone in the area breathing that air.

Are you going to encourage the use of electric (zero emission) vehicles by providing chargers to those driving such vehicles? Especially your employees?

- Noise Pollution - With the increased traffic it is also imperative that noise levels be accurately estimated and mitigated. This could be a huge health detriment to residents/employees on your new campus as well as those residents already living in the area.
- Do you plan to promote use of public transportation to help mitigate these concerns? Perhaps run shuttles to/from your location or perhaps to/from the closest green line.

T-

3) The construction is in 3 phases over 15 years - 2021 - 2036. It will be unlivable for people bordering the property. The plan is to pulverize all of the excavated concrete on site. Who knows what that will put into the air we breath in addition to the noise and vibration. I am also concerned about the demolition of older buildings which may contain asbestos and lead paint and who knows what else. In addition 100s of concrete trucks and other equipment on the streets of 190th, prospect beryl, etc for 15 years will negatively impact everyone living in or passing through the area on their way to/from work. BCHD is about health and yet you could be killing your neighbors. I hope no one with compromised lungs (asthma, COPD, etc) lives east of your construction as the prevailing winds most likely will blow all that debris their way. Are you going to be accountable for increased health issue to your neighbors including increased incidence of cancers in the years to come?

T-

Impacts:

- Increased Health Impacts
- Air Quality and Green House Gas (GHG) Emissions
- Noise & Vibration
- Hazards & Hazardous Materials
- Transportation & Circulation

4) A lot of digging in Phase 1 to add more subterranean parking.
- Have Geologic/Hydrologic Studies been conducted?
- Noise & Vibration - This may be the biggest impact due to this digging. Is this land stable? Is there a fault line nearby? Risk of liquefaction?
- Increased Health Impacts (depending on what particulates are released into the air)
- Air Quality and Green House Gas (GHG) Emissions
- Hazards & Hazardous Materials
- Transportation - to haul all that dirt out

T-

5) Active green space to replace acres of asphalt. That sounds like a good improvement. But I have concern that what that will be is not yet defined. Will it be turf?
- Potential Biological and Hydrological Impact:

It is crucial that water use be minimized and that ground cover be water permeable. We cannot have the water running downhill to the storm drains to the ocean. Also given our current climate crisis it is imperative we reduce (not increase) Green House Gases. Turf is not water permeable and even if it was it heats the ground and provides home to no life. Any green space should be used as an opportunity to use drought tolerant, native plants to ensure as little water usage as possible in the future while creating habitat for native species and restoring Redondo Beach closer to what it once was.

T-

6) It was stated at your meeting that several large trees on the southern hill of the property may be removed and that timing would be considered to not be during bird nesting season.

Biologic Impact - I appreciate that but there is a biologic impact beyond nesting birds. In clearing the land there could be impact removing native plants as well as impact to native species of insects, animals, etc. There could be beehives destroyed or eggs, homes, etc of protected species.

T-

It is also imperative that you plant more trees than you remove. Again, this is an opportunity to plant native shade trees.

- This would address Climate Change, Air Quality, Water Retention, and Green House Gasses

□T-□
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7) A corner of the lot (Flagler in Torrance) is currently a vacant lot which I did not know has an abandoned oil well beneath it. I have grave concerns over the development of that. Extensive studies should be done regarding that area before it is disturbed or used for any purpose whatsoever.

Unknown but potential impacts:

- Increased Health Impacts
- Air Quality and Green House Gas (GHG) Emissions
- Hazards & Hazardous Materials
- Biological, Hydrology

□T-□

8) The drawing currently shows the new child development area alongside a busy street. This makes no sense to me regarding child safety both physically (being taken by a stranger) nor regarding their exposure to traffic noise and pollutants. It seems that the children should be in the most protected green space in the proposed courtyard.

I have enjoyed BCHD and blue zones activities for many years including (but not limited to) zumba and yoga.

I find it shockingly contradictory that BCHD would propose a development of this magnitude. The proposed design, height, size, and length of time to develop is going to damage the health and quality of life of residents nearby for 15 years! Not to mention the value of their homes.

□T-□

Does the development have to be so detrimental to the residents and be a massive eyesore from then forward?

Again, traffic, noise, odors, what we breath, GHG contribution will be horrendous for 15 years and beyond.

At a minimum it needs to be downsized considerably.

Again, this is the opposite of everything blue zones promotes. This project will destroy many residents' health and quality of life for the purpose of providing care for other people in the future. That should not be an acceptable tradeoff nor is it necessary. If this development goes through as proposed I will choose on principle not to use any of your facilities/programs in the future.

Sincerely,
April Telles
112 Via El Chico
Redondo Beach, CA 90277

Marianne Teola
1737 Van Horne Lane
Redondo Beach, Ca 90278

Mr. Nick Meisinger, Environmental Planner
Wood Environment & Infrastructure Solutions, Inc.
9210 Sky Park Court, Suite 200
San Diego, CA 92123

The Beach Cities Health District Healthy Living Campus Master Plan is detrimental to the health and safety of the residents of Torrance and Redondo Beach.

According to The Environmental Impact Report, “the Project could potentially result in significant environmental impacts to the following resource areas checked below”. The final sentence under Discussion mentions that this issue will be further assessed in the EIR. What are the implications of further assessment? How will the community be notified that these areas have been corrected?

- * I question the use of the word “potentially” when sixteen of the twenty areas have been checked. In the areas checked, fifteen areas have the majority of checks in the area of “Potentially Significant Impact.”
- * Within the areas, based on the Environmental Checklist, the majority of checks are under the column, “Potentially Significant Impact”.

- Aesthetics (3/4)
- Air Quality (3/4)
- Cultural Resources & Tribal Cultural Resources (3/4)
- Energy (1/2)
- Geology and Soils (5/6)
- Greenhouse Gas Emissions (2/2)
- Hazards and Hazardous Materials (3/7)
- Hydrology & Water Quality (4/5)
- Land Use and Planning (1/2)
- Noise and Vibration (2/3)
- Population and Housing (1/2)
- Public Services (2/5)
- Transportation (4/4)
- Utilities & Service Systems (5/5)
- Mandatory Findings of Significance (3/4)

MT-1

Areas in Need of Further Clarification and Consideration – In reference to the Environmental Impact Report, the following items are in need of review.

- * ***There are 320 parking spaces, but there is no mention of how they leave the parking structure?*** Flagler Lane in Figure 3 looks like a street, when in reality it is narrow and resembles an alley. According to the plan, the entrance to the new parking structure will be via the north entrance along Prospect/and a new entrance off Flagler Lane.

MT-□

***Where are the pictures of Prospect in the morning when parents are driving children to school? Where are the pictures of traffic in the afternoon on Prospect?** In Figure 3, there are four cars on Beryl Street. Depending on when this picture was taken, this is not an accurate representation of that intersection. If pictures are to be taken of traffic patterns, those pictures should accurately note day and time.

MT-☐

*** If distance between the Beach Cities Health District and schools in the area are mentioned, then all schools that are impacted by this development should be mentioned in the Environmental Impact Report.** There is no mention of Parras Middle School, which is across the street from Redondo Union High School. How is the high school impacted and not the middle school a block away? What about the schools north of this project and those students and staff: Our Lady of Guadalupe on Prospect and Jefferson on Harkness, will they not be affected by noise pollution, air pollution and traffic?

MT-☐

*** Under Public Services, there is mention of dog parks?** There is only one dog park. It is managed by Friends of the Dog Park. Public Works empties trash once a week and provides some maintenance. The Dog Park is built on a landfill?

MT-☐

*** This project is slated to last fifteen years, during this time, what guarantee is there that the health of the community will not be compromised? What guarantee is there that the value of our homes will not be adversely affected by the construction.** During this time, the community will be subjected to concrete particles due to pulverization; noise/traffic from cement trucks and heavy haul trucks; air pollutant emissions; odor emissions from construction equipment exhaust and application of asphalt and architectural coatings; the transport, use and disposal of hazardous materials such as paints, solvents, oils, grease, and caulking; possible contamination from the oil and gas well located on the empty lot; potential impact from previous contamination (former underground storage tank), potential presence of asbestos and lead-base paint, construction activities could degrade water quality, etc.

MT-☐

*** There is no mention of afternoon breezes or air current that permeate the beach community. Will construction dust and pollution impact the citizens residing in other cities of the South Bay?**

MT-☐

Construction of the South Bay Hospital and parking lot began in May 1958. The Hospital opened in August 1960. There have been many changes to the city with regard to population growth and residential growth. The hospital was closed in 1998. Without the hospital, there is no need for Beach Cities Health District as it currently functions. Many of the health and wellness programs could be assumed by the private sector.

MT-☐

July 29, 2019

WRITTEN COMMENT FORM
BEACH CITIES HEALTH DISTRICT
HEALTHY LIVING CAMPUS MASTER PLAN EIR

If you would prefer to submit written comments, please complete this written comment form. Continue on the back of the form or attach extra pages, as necessary.

In order to be addressed in the Draft Environmental Impact Report (EIR), written comments must be received by the close of the public comment period at 5:00 PM on July 29, 2019.

NAME: Gary Teraoka

TITLE/ORGANIZATION: _____

ADDRESS: 19427 Redbeam Ave Torrance, CA, 90503
(Street) (City/State/Zip)

—COMMENTS—

Need to address increase in traffic in the residential street in Torrance due to the Flagler entrance/exit on Flagler for the new subterranean parking.

T-1

Possible alternative design is to move Flagler parking entrance to Diamond which will only access from Prospect.

T-2

Please hand this completed form to Wood staff at the sign-in table or mail to:

Mr. Nick Meisinger, Environmental Planner
Wood Environment & Infrastructure Solutions, Inc.
9210 Sky Park Court, Suite 200
San Diego, CA 92123

Written comments may also be e-mailed to:
EIR@bchd.org

7-24-19

TO : NICK MEISINGER, ENVIRONMENTAL PLANNER
WOOD ENVIRONMENT/INFRASTRUCTURE SOLUTIONS
9210 SKY PARK COURT, SUITE 200
SAN DIEGO, CA 92123

FR : JOSEPH TOMPKINS
19439 TOMLEE AVE
TORRANCE, CA 90503

RE : PLANNED BCHD PROJECT

SINCE 1970 (FOR 49 YEARS) I HAVE LIVED AT THE BASE OF THE BCHD HILL, BEHIND THE FACILITY. I HAVE FELT THE EFFECTS OF VARIOUS PAST CONSTRUCTION/DESTRUCTION PROJECTS ON THE HILL. I HAVE ENDURED THE FOLLOWING DELETERIOUS EFFECTS OF SUCH PROJECTS:

NOISE FROM THE HILL ABOVE US, NOISE RESONATES DOWN UPON US, UNATTENUATED BY ANY MITIGATING OBSTRUCTIONS, LIKE TREES, ETC. IT-1

VIBRATION PAST PROJECTS HAVE CAUSED HOUSE VIBRATIONS THAT HAVE RATTLED WINDOWS, DISHES, GLASSWARE, ETC., AKIN TO A MINI-EARTHQUAKE, COMING DIRECTLY THROUGH THE GROUND, DIRECTLY DOWN FROM ABOVE.

DUST CARRIED BY OFTEN STRONG PREVAILING WINDS FROM THE OCEAN, DEMOLITION DUST HAS BEEN DEPOSITED FROM ABOVE US, COATING HOUSES, PATIOS, TREES, CARS, STREETS, ETC. IT-C

SMOG DIESEL EXHAUSTS FROM ENGINE-RUNNING TRUCKS PARKED ABOVE HAVE ALMOST SUFFOCATED US SEVERAL TIMES IN THE PAST; THIS IS CERTAIN TO HAPPEN CONTINUOUSLY AS DEMOLITION DEBRIS IS LOADED INTO IDLING TRUCKS. IT-C

(OVER)

(NOPE MANY TIMES IN THE PAST I HAVE
HAD TO GO UP ON THE HILL TO DEMAND THE
STOP TO THE OFFENDING ACTIVITY.)

DESTRUCTION THIS PLANNED PROJECT WILL
CAUSE THE DESTRUCTION OF THE PEACE
AND QUIET OF AN ENTIRE, OTHERWISE
TRANQUILL, NEIGHBORHOOD. PLEASE STOP
THIS EXTRAVAGANT PROJECT IMMEDIATELY!

Joseph Toupin

July 24, 2019

from: Delia A. Vechi

page 1 of 3

Re: BCHD Healthy Living Campus, proposed project

To whom it may concern:

BCHD serves Redondo, Manhattan and Hermosa Beach; consequently sent out "Healthy Living Campus" to the other cities. Our City doesn't have more room for more facilities for seniors; we with a big heart have allowed a lot of them eliminating grammar schools and contributing to the exodus of families with kids. Redondo is saturated with 7 senior complex and 2 assisted living facilities plus all over the city, board and care homes.

The irony is that in our City, for years were living many residents that are seniors now and only those are the ones that we need to take care first, particularly in emergencies.

The first responders confirmed me that the first places they will go, in disasters, are where there is a concentration of senior facilities: housing or assisted living places. But the Redondo residents: young, the ones **old as the others** and in the middle in our community that have been living here and paying taxes for years, will be left behind!

Prior to propose a project of this magnitude, that really is a concentration of the 420 units for the elderly, BCHD should have been doing a research in Redondo, as signal of respect to our residents, and also what is the situation in Hermosa and Manhattan that you serve too, regarding existing similar complex.

This is the list of existing senior housing and assisted living facilities in the city of Redondo

Salvation Army: corner of Beryl and Catalina Ave. across the Crown Plaza Hotel and next to Hotel El Redondo.

Casa de Los Amigos: by the beach, 123 S. Catalina Ave.

Seaside Village: 319 N. Broadway corner with Carnelian, across the City Hall.

Season: 109 S. Francisca Ave facing PCH, between Emerald St and Gardner St. former site of Mc Candles School demolished.

Heritage Point: 1801 Aviation Way [another school site eliminated]

The Montecito: 2001 Artesian Blvd corner with Green Ln. It is a 4 stories building [mixed use] that has affected all the properties behind.

Breathwater Village: 2750 Artesia Blvd, huge complex next to the Best Western Inn

Silverado: assisted living facility, 514 N. Prospect Ave inside the BCHD.

The Kensington: assisted living facility opened recently, 801 S. PCH location of Paterson School which was demolished.

Plus all over the City private board and care homes that have license to have certain amount of seniors.

Most of the **residents of those complex** and facilities are coming from all over the places, very **few are from Redondo.**

Giving room for this type of projects for the elderly, that they only benefit the outsiders, not our City, have changed the idiosyncrasy of our population: from a vibrant beach City where all ages were enjoying and related together, for a silent population of seniors that they are coming from everywhere. They are affecting our quality of life, our budget, putting pressure on our responders [that are paying for Redondo], to name few of the consequences. In addition are pushing families out, that we know for facts, they are moving to Manhattan or Palos Verdes Peninsula looking for better schools and more diverse community.

It has been proved all over the world that the seniors that have less chance to have dementia or Alzheimer are the ones that socialize with all different ages among the few benefits; besides that 99% like to **live and die in their own home..** BCHD should be aware of this information before move forward.

BCHD must send this 420 Residence Care for the Elderly Units to Manhattan that has only two [2] senior housing and its serve also for BCHD.

BCHD bought the corner lot of Flagler and Beryl, from a petroleum company that was pumping oil for years from that soil.

Two years have passed, but BCHD has never responded to the question regarding if the soil has been tested for toxic substances and is not contaminated. Besides if the soil is contaminated: who will pay for the cleanup? The Petroleum Company or BCHD with the money it receives from our taxes.

BCHD stated that it: "has been working with the community to reimagine our aging campus to better reflect our mission and meet the current health needs of Hermosa, Manhattan and Redondo Residents".

The above statement that sounds so good is totally a fallacy regarding both to work with the community, and the purpose of the project as I explained above. Very few people from Redondo assisted to the meetings, because they never were well promoted that every single one in the City of Redondo be aware what was behind the Healthy Living Campus. The ones that attended and push for the project in our City were residents of Manhattan Beach with the message NOT IN MY BACKYARD!

BCHD Healthy Living Campus is in reality a **concentration of 420 Residential Care for the Elderly units!!**, that they will be added to the collection that Redondo already has plus its consequences.

NO PROJECT is the only answer for the BCHD proposed project!

Redondo cannot be the dumping place of these types of projects, every city needs to share the burden, in this case in particular the others that BCHD serve!!!!

Delia A. Vechi
District 2

Ramos, Ryan

From: EIR <eir@bchd.org>
Sent: Tuesday, August 13, 2019 11:59 AM
To: Meisinger, Nick
Subject: Fw: BCHD HEALTHY LIVING CAMPUS

From: Delia Vechi <pelu1917@yahoo.com>
Sent: Monday, July 29, 2019 12:25 PM
To: HLCInfo <HLCInfo@bchd.org>
Subject: BCHD HEALTHY LIVING CAMPUS

July 29, 2019
To: HLCINFO
Re: BCHD HEALTHY LIVING CAMPUS
To whom it may concern:

DV-1 | I have the curiosity to know: How BCHD is planning to finance this proposed project?

DV-2 | In addition, according to the National Association of Home Builders [NAHB] is a boom in the last 5 years the **aging in place remodeling**, it is proving again what the AARP stated: that 99% of the seniors want to die in the homes where they are living.

The above question and comment should be added to my opinion sent July 24, 2019 regarding the BCHD Healthy Living Campus which I consider in two words a NO PROJECT! Please acknowledge this e-mail and have the courtesy to do the same thing with the comments that I have sent 7-24-19 as I have requested.

Thank you,
Delia A.
Vechi

District 2

Lamb, Kaylan

From: EIR <eir@bchd.org>
Sent: Thursday, July 25, 2019 10:02 PM
To: Meisinger, Nick
Subject: Fw: BCHD Healthy Living Campus Project

From: Janis Vogt <janpug@verizon.net>
Sent: Friday, July 19, 2019 6:45 PM
To: EIR <eir@bchd.org>; HLCInfo <HLCInfo@bchd.org>
Subject: BCHD Healthy Living Campus Project

To whom it may concern:

Pertaining to the Beach Cities Health District (BCHD) Healthy Living Campus Project, please consider the following concerns. Most of these concerns have been voiced by others at the meetings though a few are new. I am just trying to capture and document concerns already identified by others and add my additional concerns.

1. It appears notification may have only gone into Torrance within 0.5 miles of the proposed project. However students at Towers Elementary live well beyond that distance. Please notify their parents. □□-1
2. The duration was described to be 15 years in total at the West High meeting. No one disputed that. Documentation of the estimated time to complete on the BCHD web site also implies a similar duration. I have never heard of any construction project of this size taking that long. This duration will be an inconvenience for everyone. □□-□
3. The removal of the existing building materials may involve hazards. These materials (potentially Asbestos etc) could be carried into the neighborhood directly east of the project site. This neighborhood is in Torrance. □□-□
4. Note that the hazards discussed in item 3 may also be carried on to the Towers Elementary campus and the playground and dog park just Northeast of the proposed project site. □□-□
5. As the breeze may carry the hazards into these areas during construction, once completed the breeze may be blocked by the new buildings. That may cause an increase in energy use during the summer. □□-□
6. There have been several accidents over the years in the Torrance neighborhood just east of the project site. A driveway into Flagler may contribute to more accidents due to traffic. □□-□
7. The risk identified in item 5 from traffic also applies to pedestrians and children. Note that the area on Towers St. just west of Redbeam is extremely crowded with children during the school year at various times. The times vary due to changes in start time, school closing time, and the existence of a children's YMCA program before and after school at Towers Elementary. □□-□
8. The traffic increase may also increase noise in that neighborhood. □□-□
9. The project duration as described in item 2 is a concern as the construction may create additional noise, pollution, hazards as defined in item 3, dust, and congestion in general that will go on for a long time. □□-□
10. A specific to item 8 is trucks driving on Beryl, will create noise that impacts learning at Towers Elementary and will create a traffic and pedestrian hazard at the Towers Elementary entrance on Beryl. □□-□

11. Another specific to children, is many Redondo Beach Union High School students take the Flagler alley as a walk way to Diamond Street to get to school in the morning and take the same route to get home. Some of these students are on skate boards. There may be a risk to them during and after the construction.

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12. There is also a concern about dirt run off from the project site during storms. This may make the roads more slick and increase the probability of accidents. Additionally it may be messy.

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13. It appears that the shopping center just north of the project site may be impacted. Shoppers may be reluctant to patronize the stores, shops, and eateries due to traffic, noise, dust and any other potentially harmful materials.

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14. There is a concern of potential impact to property values in the Torrance neighborhood just east of the project site. It may be very difficult to command market value when there is a lot of construction traffic, noise, dust and potential hazards as described in item 3. An open house that experiences these distractions or sees the potential of these distractions may limit buyers interest and thus reduce property values. This situation could turn out to be very unfair to the owners of the property in that neighborhood.

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In general there may be some severe negatives to Torrance property owners and renters, Towers Elementary students, Redondo Union High School students, businesses (see item 12) and others who reside in the vicinity of the project site. However it is unclear what benefit these people and businesses obtain from this project. There could be a "fairness" that is very lopsided against these neighborhoods and businesses.

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One observations is this site is surrounded by neighborhoods, businesses, schools, and playgrounds. Other designs along Lomita Boulevard between Hawthorne Boulevard and Crenshaw Boulevard are not mixed in with neighborhoods etc. Another comparison is Rosecrans Street between Aviation Boulevard and Pacific Coast Highway has similar designs that are also not mixed in with neighborhoods etc.

Please consider these concerns in the Environmental Impact Report as well as the project design in general.

I look forward to any responses in meetings, environmental impact reports, and designs.

A Torrance Resident.

Lamb, Kaylan

From: EIR <eir@bchd.org>
Sent: Friday, August 02, 2019 1:26 PM
To: Meisinger, Nick
Subject: Fw: Public Comment on Construction

From: aiko wada <aikowada721@gmail.com>
Sent: Thursday, July 25, 2019 7:23 PM
To: EIR <eir@bchd.org>
Subject: Public Comment on Construction

I live in Torrance a few hundred feet directly east of the proposed BCHD construction project. I am nearly 91 years old with a variety of health problems. I am required to walk and exercise regularly to keep my health up, but with the construction, my lungs will not be able to take the dust and any other materials that blow with the wind towards my house and the area I walk in. □□ -1

Also, my hearing aids pick up all noises large and small, and amplify them. I will not be able to read, watch my television, or work on my puzzles with constant irritating construction noise. □□ -□

I am very frightened about the increase in traffic the project will cause. I had a pick-up truck come from Flagler down Towers, that missed the curve. He landed in my flower bed in front of my front door. I was terrified, scared, and stay awake at night wondering how this project will harm me. □□ -□

My granddaughter is getting married next year and I don't want to die because of this project before then. I eventually want to be a great-grandmother. Please stop this project.

Thank you,
Aiko Wada

Ramos, Ryan

From: EIR <eir@bchd.org>
Sent: Tuesday, August 13, 2019 12:07 PM
To: Meisinger, Nick
Subject: Fw: BCHD Project

From: Melissa White <melissarwhite13@gmail.com>
Sent: Sunday, July 28, 2019 12:40 PM
To: EIR <eir@bchd.org>
Subject: BCHD Project

Hello,

MW-1 | My kids attend Beryl Heights Elementary. I am concerned about the environmental effects of the BCHD project on my kids. I have heard that the building currently at the site is old and contains a lot of asbestos and other harmful materials within the walls, and the kids will be exposed to these substances with demolition and construction. Is there something being done to minimize the potential health impact of the project? If so, what? And how can we be assured that our children will not be harmed?

Thank you,
Melissa White

Ramos, Ryan

From: EIR <eir@bchd.org>
Sent: Tuesday, August 13, 2019 11:57 AM
To: Meisinger, Nick
Subject: Fw: Comments on Potential HLC Project and NOP/EIR, etc

From: Patrick Wickens <patwickens@verizon.net>
Sent: Monday, July 29, 2019 5:19 PM
To: HLCInfo <HLCInfo@bchd.org>
Subject: Comments on Potential HLC Project and NOP/EIR, etc

Management, BCHD Board of Directors and Staff, and Whom It May Concern,

With regards to this huge and extremely risky Program Description, only one conclusion is warranted....THE NO PROJECT ALTERNATIVE.....

As a resident and homeowner in District 3 for 37 years, I have seen decades of financial mismanagement by BCHD Board of Directors, and the previous CEOs which have resulted in waste and abuse due in large part to little business experience and almost no oversight. This has put the District in its present dire circumstances and its desperate attempt to become a retirement center for the extremely wealthy (i.e.) Palos Verdes....for which they have no experience, training, or knowledge.

And this will be putting all the home owners in the Beach Cities at a huge property tax increase, Bond obligations, etc and risk of even greater financial obligation.

This mis-guided project will disrupt the entire city of Redondo Beach for decades for a highly risky venture for which the BOD and BCHD management have no experience, training, or expertise.

The conclusion is : THE NO PROJECT ALTERNATIVE

Patrick Wickens
Resident of District 3-Redondo Beach

Lamb, Kaylan

From: EIR <eir@bchd.org>
Sent: Friday, August 02, 2019 1:37 PM
To: Meisinger, Nick
Subject: Fw: BCHD project

From: Sandra Williamson <sjmwilliamson@hotmail.com>
Sent: Monday, July 29, 2019 9:10 AM
To: EIR <eir@bchd.org>
Subject: BCHD project

To Whom It May Concern:

There is a major safety issue presented by positioning an egress on Flagler. Within a short half block, students from Towers Elementary School enter and exit the school. More traffic in that area presents a major safety problem for our children and those who may be accompanying them. As it is, a teacher needs to be at that exit in an attempt to keep children safe from all the traffic.

Since Del Amo Blvd. was extended many people use Redbeam Avenue and Mildred Avenue as shortcuts to get to Beryl and this has caused increased danger on our streets. If Flagler is used as a point of egress this issue will be compounded. Our streets need to be kept safe!

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Sent from my iPhone

Beach Cities Health District
Healthy Living Campus Master Plan EIR
Written Comment Form

July 27, 2019

TO: Mr Nick Meisinger, Environment Planner
Wood Environment & Infrastructure Solutions, Inc.
9210 Sky Park Court, Suite 200
San Diego, CA 92123
EIR@bchd.org

Dear Mr. Meisinger,

My comments to be addressed in the Draft Environmental Impact Report (EIR) for the BCHD Healthy Living Campus Master Plan are outlined below.

Regards,

Brian Wolfson
Resident City of Torrance
19802 Tomlee Ave.
Torrance, CA 90503
annbrianw@gmail.com

Encourage the BCHD to start over and set their sites on achieving something truly transformative. The proposed concept is incompatible with the surrounding neighborhood and unnecessary given the variety of facilities available throughout the area. Instead of increasing the population density of the South Bay by adding hundreds of senior housing units, the developers should greatly reduce the number of rooms and consider how to best maximize the site of the old Southbay Hospital for all age groups in the South Bay. Embrace the concept of a 21st Century Intergenerational Health Center that promotes and fosters healthy living and community interaction. Make it something the community would be proud to promote and people of all ages and incomes might live.

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As proposed, the \$537 million, 420 unit assisted living center for the elderly as well as the three phases of construction it is going to require would be overwhelming. The

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concept destroys the aesthetic character of the neighborhood, a greatly reduced campus could be moved to the center of the 11 acre site away from the perimeter to minimize its scale. The reclaimed green space could then be better used to create a grand outdoor sanctuary for healthy living, exercise and leisure. Before going forward with the EIR seek input from environmental groups like the Palos Verdes Land Conservancy, Madrona Marsh and others who can best help in restoring native plants and species.

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To ensure the best use of the site and to prevent its misuse, the following specific deficiencies within the NOP must be fully addressed and brought to the attention of the cities of Redondo Beach, Torrance, Hermosa Beach and Manhattan Beach before the BCHD can make any further decisions.

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Relocate the public entrance/exit identified as part of Phase I to the North/West driveway on Prospect Ave. In order to reduce transportation impacts and ensure the safety of children going to Towers elementary school there can't be public access via Flagler Lane. The Towers Ave. entrance to the playground is less than 300 feet from the site and is used five days a week by children in the morning and afternoon.

Change the determination found in the Notice of Preparation (NOP) Environmental Checklist (EC) under III Air Quality, item d., from "Less Than Significant" to "Potentially Significant Impact" and needs further assessment in the EIR. It is not for the applicants to determine that construction exhaust from equipment and application of asphalt may generate only minor temporary odors during the 15 years of construction. Fifteen years is a lifetime for sensitive receptors and others and this needs to be professionally studied to conclude it is not a health risk.

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Reduce the number of units to avoid a substantial adverse effect on the scenic vista (NOP EC I Aesthetics a., c., & d.). Effectively mitigating this problem by reducing the building height of the RCFE units from 3 to 2 floors.

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Relocate the child development center to the interior of the project to mitigate the adverse effects on children of air pollutant emissions generated during construction and by motor traffic at the intersection of Beryl and Flagler Lane. (NOP EC III Air Quality d.).

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Change the NOP EC XV Public Services c., d., & e. from "No Impact" to "Potentially Significant Impact." The NOP erroneously states the "residents would be expected to utilize the active green space and health facilities provided on the BCHD Healthy Living Campus". There is no way to predict what people will do after moving

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into their units. The drain on public services can't be minimized and must be studied as part of the EIR before any consideration of viability can be evaluated by all affected parties including City of Torrance.

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Change the NOP EC XVI Recreation a. & b. from "No Impact" and no further study needed to "Potentially Significant Impact." Again, it's not the role of the BCHD to determine what will and will not be assessed further in the EIR. The BCHD rationalization that "residents would be expected to utilize the active green space" etc. is a straw man designed to avoid further assessment in the EIR. The full impact on the city owned recreational facilities surrounding the project must be determined properly. Might special accommodations or increased staffing be required to maintain Dominguez Ball Field, Dominguez Dog Park, Entradero Park Baseball Field, Basketball Courts, playgrounds and nature preserve? It's not within the scope of the BCHD to determine that these facilities "could reasonably accommodate additional users." Could these restroom facilities absorb the additional service-needs as well as the new users brought about by the addition of 360 new assisted living units and the impact that a 15-year construction plan would bring about? This item must be studied further and objectively via the EIR as required by law.

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Revise the NOP EC VXII (I think this should be numbered XVII) Transportation b., from: "direct input of the city of Redondo Beach Planning Department." To: "direct input of the cities of Redondo Beach and Torrance Planning Departments." The BCHD is requesting access to and from the site via Flagler Lane. The BCHD NOP recognized the potential for "hazardous conditions" and "obstructing through traffic." along adjacent roadways but fails to name the City of Torrance which will be significantly burdened, therefore this condition must be further assessed in the EIR.

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Revise the NOP EC XIII Noise and Vibration, c., from "No Impact" to "Potentially Significant Impact" needs further study. Additionally, change the text to include Zamperini Field southeast of the project site. The Torrance airport does generate noise that may subject residents, workers, etc. to disruptive noise and vibrations.

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Change the NOP EC VII Geology and Soils a., ii, iii, and iv, from "Potentially Significant Impact" to "Less than Significant Impact." This designation is misleading and erroneous. The BCHD points out that a Geotechnical Study prepared for the project has confirmed that there are no known active faults on or near the site. (Converse Consultants 2016) and that no mitigating measures are needed other than to comply with modern building codes - as are all projects subject to California Building Code Title

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9, Chapter I, Section 9-1.00. The focus on earthquakes in the BCHD's public comments stokes fear and falsely validated the inevitability of the proposed redevelopment.

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Within the NOP EC IV Biological Resources c., review changing the determination of "No Impact" to another determination if the Project Specific Biological Resources Survey (Hamilton Biological 2019) did not evaluate and consider any potential adverse effects on the Entradero Park Nature Habitat during the construction period.

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Within the NOP EC IV Biological Resources d. & e., change from "Less Than Significant Impact" to "Potentially Significant Impact" to ensure if removing trees affected by the project proposal within the boundaries of the City of Torrance do not violate any California wildlife regulations or violate any city or county biological regulations. Change the text of the EIR to include "plan revisions" by the City of Torrance, which is a "Tree City USA" designated city and have the proposed mitigation plan for birds under item e. reviewed by the appropriate state agencies.

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Within the NOP EC IV Biological Resources f., change the designation from "No Impact" to "Potentially Significant Impact" to ensure that a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan agency assesses the proposed plans fully to ensure no impact to biological resources and to incentivise the BCHD to expand the greenspace and to replant the area using only native species including those known to be a feed source for all species previously known to have been within the vicinity of the Project site. Including the El Segundo flower-loving butterfly, Palos Verdes Blue butterfly, red tailed hawk and various hummingbirds and native sparrows.

Lastly the KVLs have not been made public but should be available for public review in the draft EIR. The KVLs must include multiple locations in and around Entradero Park, Sunnyglen Park, all schools in the vicinity of the project, the Dominguez Park Baseball fields. 190th Street between Flagler and Entradero street, Redondo Beach Union High School outdoor swimming pool and all key streets within the Pacific South Bay tract, Redondo Beach and Hermosa Beach. Without such documentation it will nearly impossible to evaluate the true impact of the construction and proposed plans.

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The BCHD is shirking its responsibilities as a publicly funded agency that pledges to enhance community health. We need scientists, engineers, politicians and community

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members to actively work as one to help better manage this site and the proposed land development. Don't allow the BCHD to use a \$537 million undertaking to enrich themselves.

Public Comments to the Healthy Living Campus Master Plan NOP

July 28, 2019

Ann Wolfson
19802 Tomlee Ave.
Torrance, CA 90503

To:
Mr. Nick Meisinger, Environmental Planner
Wood Environmental & Infrastructure, Inc.
9210 Sky Park Court, Suite 200
San Diego, CA 92123
EIR@bchd.org

Dear Mr. Meisinger,

I am a resident in West Torrance and recently learned about the current BCHD development, the “Healthy Living Campus”. The following documents my serious concerns, not only as a long-time resident of West Torrance, but as a lifetime resident of both Torrance and Redondo Beach.

It was with due diligence that I read the entire BCHD NOP after learning of the project at the Torrance Scoping meeting. The massive scope of the project and the serious, harmful impacts both near and long-term through the 15-year construction period, and after completion was frankly shocking and alarming.

The immense negative ramifications on our neighborhood, environment, and community are both staggering, and if by chance the proposed project is approved and implemented, irreversible.

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One example of the harm that is inherent in this project is the timeline of the construction project itself: three construction phases of three years each over 15 years.

Fifteen years is an entire childhood from toddler to adult. This is a prime demographic of our community – families with young children looking for a safe neighborhood with good schools in which to raise their kids. It is the reason we bought our home here in Torrance as my oldest son was about to enter kindergarten.

Fifteen years is a lifetime for a senior. This is another prime demographic of our community, older residents including original owners who, if nothing is done to prevent this project, will live the rest of their lives in a construction zone. In addition, to the potential significant health hazards, the damage to quality of life affects this generation and those generations to come.

I hope that you take due diligence to read and address my concerns and all constituents' comments in the draft EIR.

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Concerns include but are not limited to:

- Proposed 120,000 ft. subterranean parking structure, excavated off a residential road that leads into a West Torrance housing tract, with construction haul street and proposed sole entrance to it 20 ft. away from the nearest home
- Project site 350 ft. away and directly downwind and down slope of Towers Elementary school which has ~600 students from 5 to 10 years of age, and residential tract backing up to site
- Construction timeline of 15 years which includes three 3-year increments of heavy demolition, grinding of materials onsite, excavation, construction, noise, traffic hazards and significant health risks to humans and environment and wildlife in all surrounding areas, and in particular West Torrance downwind and downslope of project
- Aesthetic hazards to all surrounding vistas in the surrounding communities during 15-year construction timeline, and final proposed build which is built high on the perimeter of the 11-acre site, on a 30 ft. high sloped bluff.
- Lack of Approval rights by the City of Torrance though they are listed as one of two "Responsible Agencies" on the NOP
- Lack of official communications and information about BCHD project to affected Torrance residents, nearby schools and Torrance public at large

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For ease of use, my comments are organized following the order of the original NOP and Environmental checklist. My comments are listed below. My requests are in italic.

Items that I'd like to bring to your attention for the draft EIR:

Omissions

1. Public Communication regarding BCHD project

- a. The planned BCHD EIR/NOP scoping meetings were set up for and communicated to the cities of Redondo Beach, Hermosa Beach and Manhattan Beach only. They did NOT include Torrance. A hastily set-up Scoping meeting was held at request of the City of Torrance hours before it took place. No notification or communication of any kind was published for or sent to Torrance residents, even the most affected citizens directly in its path. I can find no evidence that the BCHD project at large was ever communicated to Torrance residents before the Scoping meeting on July 17. None of the people I know that live in the affected areas of Torrance knew about this. No one I know saw it coming.
- b. NOP Approval and Commenting Period Timing – Scoping meetings were initiated more than two weeks into the 30-day process. This left little over a week to read, analyze and respond to a 68-page NOP after attending the

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Torrance meeting. Only a few residents at the meeting had heard of this project that if approved, will dramatically affect their family's lives.

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=>Include City of Torrance residents on ALL communications regarding this BCHD project going forward.

2. Responsible Agencies and Approvals

- a. City of Redondo Beach and City of Torrance are designated as the sole two "Responsible Agencies" yet there is NO authority given to City of Torrance as approver. Sole approver is currently the City of Redondo Beach.
- b. Although Torrance is listed one of two Responsible Parties (City of Redondo Beach and City of Torrance) in the NOP, under Approvals, the City of Torrance is only listed as may have discretionary approval for potential Bike Path (see below).

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"The City of Torrance may also be asked to consider one or more discretionary approvals associated with potential bicycle and pedestrian improvements along Flagler Alley between Flagler Lane and Diamond Street. "

The City of Torrance is grossly impacted by the project. The proposed entrance to the new 30 ft. deep, 120,000 sq. ft. subterranean parking is on Flagler Lane located in the City of Torrance on a short residential road that leads into the Pacific South Bay tract.

=>Include the City of Torrance as a final approver over anything that is within or touches its borders, or severely affects its residents. Ensure it falls within the City of Torrance Planning guidelines.

3. **Omissions from NOP's Overview.** The overview of the project fails to mention key information regarding the proximity of the construction zone to residences, potential affects to environment and potentially affected areas of Torrance that are adjoining and downwind of the project. Omissions from the NOP and additions that I request to add to the Draft EIR are as follows:

- a. Omission: Proximity to homes. The nearest residence in the Torrance Pacific South Bay tract is actually 20 ft. from the site and faces the proposed new subterranean parking entrance. The first house in the tract would be directly in front of the ingress and egress of the proposed parking area which is proposed as the sole ingress and egress of the structure.

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=>Description minimizes effect on neighborhood, and location of proposed new subterranean parking structure, and construction roads used. Include detailed description in draft EIR of how many truckloads, how many cubic ft. of soil, etc. is proposed to pass through the residential Flagler Lane road south of Beryl.

=>Include detailed photos and information on the location and proximity to the Pacific South Bay tract which backs up to Flagler Lane and Flagler Alley, particularly the residences most affected. Show KVLs from the sidewalks of these for the public.



b. Omission: West High is not mentioned in the writeup on nearby schools.

=>Include and study impact to West Torrance High ~0.7 miles from the project. Factor all of West High's core hours and after hours and weekend outdoor activities such as sports practices, games, meets, band practice, etc. held there.

c. Entradero Park has a Nature habitat and pond that captures overflow water from the area. What effect would the water and air-bound dust, contaminants, and noise factors have on it and the wildlife it supports?

=>Include and study the Nature and Wildlife Habitat in Entradero Park which is directly downwind of project.

d. Entradero Park is home to West Torrance Little League

=>Include and study the effect on the Little League Baseball Fields in Entradero Park, who's users include sensitive receptors

4. Proposed 15-year Project Timeline for Construction and Completion

a. Construction timeline of 15 years includes three 3-year phases. Each 3-year phase will include heavy demolition of old buildings, grinding of materials onsite, excavation, construction, noise, vibrations, traffic hazards and significant health risks including toxic airborne contaminants that will significantly impact children, the elderly, and public at large; the environment and wildlife in surrounding areas. In particular West Torrance is directly downwind and downslope of project.

=>Study the cumulative effects of prolonged exposure (15 years) to heavy construction sites including concrete dust, soil, potential hazardous materials, increased GHGs, noise, vibrations, traffic, etc.

=>Report out on the physical, physiological, and mental ramifications of being exposed for this length of time for sensitive receptors and the public at large.

b. Three 3-year phases over a 15-year period are currently covered in a single EIR.

=>Ensure a new EIR is completed at each phase of the proposed project. Changes to regulations, site, environmental factors, financing will change over the long time period.

5. Environmental Checklist Omissions: Things to Study, Analyze and Address in EIR.

a. Aesthetics

i. Imposing Height, Build and Location of RCFE. (ref. p. 26, I,a)

1. The proposed 60-ft. height of the continuous RCFE building runs the perimeter of the site along the South, East, and North sides. It is situated on a 30-ft. bluff making it a 90-ft. high fortress-like monolith. This imposing design of the RCFE is incongruent and completely out of proportion with any type of similar facility currently in the Beach Cities, and beyond. (Note: the only buildings that come close to this magnitude may be large Sports venues or large public performance venues designed for entertainment for all the public to use.)

First and foremost, the BCHD project is an assisted living building for the aged. The project itself states it is for Redondo Beach, Hermosa Beach and Manhattan Beach residents.

=>Go back to Design stage.

=>For current visualization add the total dimensions of the RCFE including actual length and depth of the continuous structure. Make public conceptual visualizations and provide to the public KVLs from all sides of the project, specifically from the Eastern view which directly abuts and towers above the West Torrance residences.

ii. Continuous, 4-story building design presents inherent hazards for emergencies, particularly for the aged and infirm, including evacuations due to fire (elevators would be blocked, stairwells must be used), exposure to biological hazards, loss of power, and/or natural disasters such as earthquakes. Current sensitive receptors: memory care unit patients and children at the child development center will be living in the middle of the construction zone for many years.

=>Go back to design stage or simply retrofit the existing building to bring up to modern earthquake codes.

=>If proposed project somehow moves forward, reduce the number of units by half. Develop lower modular campus-style buildings that are friendlier to the targeted user group and organically integrated into the site. Move to the interior of the site, with green space around to improve airflow, interaction, and create a friendlier village-like atmosphere.

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- iii. **Blocked Sight Lines.** (ref. p. 26, I,c) The location on the perimeter of the site and the design of the continuous 4-story RCFE effectively destroys sight lines from three out of four directions – views of the PV Peninsula from the Northern border, Western views toward the ocean from the Eastern border, and Los Angeles views from the South. The Eastern border in particular is in close proximity and dwarfs the neighborhood below.
- iv. **15-Year Construction Span of Time.** Three 3-year construction phases leaves both the unsightly and unhealthy massive construction site highly visible for unacceptable lengths of time. In fact, construction fencing around the site could be up in some form for 15 years.
- v. **Destroyed views from all KVLs** – the prominent site up on a bluff is highly visible from all sides. KVLs to study need to be from all directions of public areas including the local schools such as Towers Elementary that is 350 ft. directly behind the project.
- vi. **Effects of Shade and Shadows.** The placement, height and continuous build of the proposed RCFE has the most damaging effects for shade and shadows, particularly for the neighborhood on the South and East of the project. Pacific South Bay residents’ backyards directly back up to the project site.

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=>Study the effect of airborne and rain runoff toxins, noise, vibrations, etc. on residential streets/homes most affected along the Eastern perimeter. Publish the diminished hours of sunlight and ramifications.

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=>Study the effect of close proximity of construction sites on home values.

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=>Again, go back to Design phase and reduce the height, move buildings away from perimeter to reduce the negative impacts of the proposed RCFE.

- vii. **Substantial New Light and Glare** (ref. p. 26, I,d). The increased light and glare from having the **4-story, continuous building** on the **perimeter** of the site and bluff directly and substantially affects all sides and sight lines of the project. Of particular impact is the East side of project with backyards that back up to the Flagler Alley. How does this project measure against light and glare standards for residential areas in Redondo Beach and in Torrance?

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=>Go back to design stage. Reduce the scope down to multiple lower modular buildings on the interior of the site. The proposed 4-story, continuous build design placed on the perimeter of the elevated site causes the highest level of aesthetic damage in totality to the

neighborhood residences, schools, parks, surrounding public vistas, and community at large.

=> For proposed design, we need RCFE/project visualizations from the most affected KVLs: neighborhood public views from the East including view from Tomlee sidewalks and sidewalks of closest houses to project, Towers Elementary School playground, Sunnyglen Park, etc.

=>Add height stakes and flags now at current site to show the actual proposed height, length of the building.

b. Air Quality (ref. p. 31, III)

- i. Emission Levels and Impact of Coastal Wind Patterns.** The location of the project on a bluff with strong sea breezes blowing from west to easterly directions needs to be studied. How far does the dust, particulate matter, potential hazardous materials when pulverized, air pollutants and toxic air contaminants blow? Immediately in its Easterly path are the Pacific South Bay tract, other West Torrance neighborhoods, Towers Elementary School, Entradero Park with Nature Habitat and Little League baseball fields, Sunnyglen Park with children's playground, etc.

=>Analyze and report out on effects in particular to the sensitive receptors, and public at large in the areas downwind (to the East) of the project.

=>Study and report out on effect of bluff topography and design of building on edge of bluff. How does the prominent height/topography of the project site and proposed building, and wind patterns unique to coastal areas (e.g., roughly 1 mile from ocean) and affect the distance the TACs and particulate matter from construction blow and affect?

ii. Odors (p.31, III d)

=>Change odors from No Impact to Potentially Significant Impact.

c. Biological Resources (p. 34 IV)

- i.** *=>Study the affected parks including the Nature habitat at Entradero Park.*

In addition to habitats on project site, nature habitats both downwind and receiving runoff from the project site would be affected.

- ii.** *=>Regarding removal of 120 mature trees; adjust plan to include original trees and augment with new planting as needed.*

Mature trees of their age cannot be replaced. Planting new trees will not have the "buffer" impact of 60+ year old trees currently on site.

d. Hazards and Hazardous Materials (p. 45, IX)

- i.** *=>Change from Less Than Significant Impact to Potentially Significant Impact for "a. Create a significant hazard to the public..."*

The proposed construction takes place over the course of 15 years (9 years actual construction time) in a heavily populated, heavily trafficked area, including on a residential street and in close proximity to other residential streets and nearby elementary schools. There is major probability that accidents or mishandling of materials could result in the thousands of trips needed to use or dispose of such materials.

=>Due to the magnitude of this project, due diligence indicates the EIR should address as “potentially significant impact”.

e. Land Use (p.52, XI)

- i. *=>Add the City of Torrance and ensure their review and approval consistent with City of Torrance general and strategic plan. The proposed subterranean parking entrance is in the City of Torrance and affects the City’s residences.*

f. Noise and Vibration

- i. The project site is 350 ft from Towers Elementary school affecting 600 children, not only during core school hours but also for after school activities, after-hour and sports activities (e.g., AYSO Soccer), and summer school held at the site.
=>Establish non-working hours during the school day when school is in attendance

=>Include in your study not only the physical effects both high decibel and prolonged but the psychological and physiological effects of noise and vibration on elementary school-aged children and their ability to learn.

=>Study the correlation of the chaos and hazards of living in construction zones with a school’s academic scores

=>Look beyond the core hours of school. After hours and weekend sports programs, summer school and other activities take place at the school.

- ii. As mentioned before the project site is located on a promontory bluff that often has the same effect as an echo chamber – the current noise seems to bounce off and noise is amplified.

=>Study and report on the effects of this unique topology on noise impact.

g. Recreation (p. 56, XVI a)

- i. *=>No Impact should be changed to Potentially Significant Impact on increased use of existing regional parks or recreational facilities resulting in their physical or accelerated deterioration.*

The significant addition of 360 new RCFE units, Child Development Center, construction workers at the site, workers at the proposed built site, visitors to the RCFE and overall project site will have a significant impact on our recreational areas over the prolonged life of the construction and after the proposed completion. E.g., if you are working in a massive construction zone, or living on site in the massive

construction zone, you are likely not going to stay on the site grounds for recreation or outings.

- h. **Transportation** – Transportation to and from the construction zone creates an insurmountable conflagration of safety hazards and environmental hazards in addition to noise and traffic nuisances over a prolonged 15-year construction period and beyond.

=>The EIR needs to clearly outline each of the hazards for all, and specifically for residents immediately in the area. Towers Elementary school has two primary entrances directly on the roads affected. The only outcome can be: Go back to Design phase. Move the entrance to any parking structure to the main thoroughfare of Prospect.

- i. **Mandatory Findings of Significance** (p.65 XXI c, d). This last mandatory category bears repeating here.

“Does the project have impacts which are individually limited, but cumulatively considerable?”

“Does the project have environmental effects which will have substantial adverse effects on human beings, directly or indirectly?”

Sixteen of 20 major categories are listed at the highest risk. Others are requested to be added for further study. The totality of the proposed project’s scope and effect on those bordering the project, its physical size and design, traffic issues, air quality, potentially hazardous impact to a residential area and schools, is ultimately unconscionable.

=>Both singular and cumulative hazardous effects of the project on people and the environment tells us this project cannot go forward as proposed.

=>Please ensure that the Draft EIR thoroughly takes the cumulative effects of all significant risk categories into careful consideration and addresses the comments you are gathering from the public and those who live in the affected areas.

In the meantime, the BCHD “Healthy Living Campus”, as proposed in the NOP, creates the opposite - an unhealthy, stressful, potentially hazardous environment for not only sensitive receptors, but all residents living in its path.

Lamb, Kaylan

From: EIR <eir@bchd.org>
Sent: Thursday, July 25, 2019 10:00 PM
To: Meisinger, Nick
Subject: Fw: proposed project at corner of Flagler and Beryl

From: marinafinearts@aol.com <marinafinearts@aol.com>
Sent: Thursday, July 18, 2019 10:09 AM
To: EIR <eir@bchd.org>
Subject: proposed project at corner of Flagler and Beryl

Hello, I want to express my opposition to your proposed project at the corner of Flagler/Beryl for a subterranean parking lot and Child Development Center. The increased traffic and density is much more than our neighborhood can stand. I live on Tomlee Ave, in the tract due east of the proposed project. The pass thru traffic is already bad and if this project goes thru, then it will be impossible. I AM NOT IN FAVOR OF THIS PROJECT AS PLANNED, Mike Woolsey

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E-MAIL (EIR@bchd.org)
Wood Environment & Infrastructure Solutions
9210 Sky Park Court
Suite 200
San Diego, CA 92123

Philip L Wu
19409 Mildred
Avenue Torrance, CA
90503 July 28, 2019

Attention: Mr. Nick Meisinger, NEPA/CEQA Project
Manager

Re: Public Comments on Proposed BCHD
Expansion Project

Dear Mr. Meisinger:

Torrance Pacific South Bay is a very unique residential community. Its ideal location provides its residents the best living environment in the Torrance areas - it's one mile away from the Pacific ocean front. The sea breeze from the ocean provides fresh air and temperate weather all year round. Due to its exclusive location, it's like a gated community even though we don't have gates established. So the traffic and public noises are relatively light compared to the rest of the surrounding communities. It is for these reasons that we consider our community as one of the most desirable areas in Torrance.

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However, the proposed BCHD re-construction project is going to destroy our community for good. The damage to our living environment will be irreparable and the property value will also be substantially degraded.

As a member of the public, and as a Torrance homeowner residing in the Pacific South Bay community, I am providing public comments to the proposed BCHD project as follows:

TRAFFIC

The existing traffic in the community is getting congested especially during school hours. Towers Elementary school is only a hundred feet away. With added vehicles during the 15 years of construction period, one can expect more traffic accidents and much less space for public parking as we have now.

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HEALTH

15 years of construction work will certainly generate dust and unforeseen chemical particles that are harmful, especially to children and our elderly residents. BCHD must act responsibly to consider these unhealthful repercussions and to not jeopardize people's well-being.

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NOISE

No one can endure 15 years of daily noise due to building demolition, ground excavation, and earth compacting. And yet, all of these activities are proposed to happen at just 100 feet above our back yard.

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AESTHETIC

The proposed facilities will be situated 60 feet on the top of the existing hill. It's like having a mountain at the back of our community. We would live under the shadow of BCHD's buildings most of the afternoon.

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In conclusion, I sincerely request that BCHD submit a new proposal which will not only mitigate all of my concerns, but also comply with the law (including CEQA).

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Thank you for your consideration.

Sincerely,
Philip L. Wu

July 28, 2019

Mr. Nick Meisinger, Environmental Planner
Wood Environment and Infrastructure Solutions, Inc
9210 Sky Park Ct. Suite 200
San Diego, CA 92123

Submitted by email to: EIR@bchd.org

Subject: BCHD Healthy Living Campus Master Plan

Dear Nick:

I am enclosing my comments to the Environmental Impact Review for the BCHD Healthy Living Project Plan. I have read the Notice of Preparation (NOP) and found that it is inadequate. There is insufficient detail given in the NOP so accurate assessments of the environmental impact cannot be made. I would ask that you please address the following omissions in more detail.

- 1) The number of children attending the Child Development Center is not described, nor is the number of staff members. This will affect traffic and parking near the center.
- 2) The drop-off zone for parents at the center is not described. Will it be in the underground parking lot, on Beryl Street, or on Flagler Street. Each of these has its own particular problem.
- 3) The physical size, and the number of members, of the new Fitness Facility is not described. A comparison of the old versus the new is needed to assess the traffic and parking issues.
- 4) The maximum number of people who can stay in the 420 rooms in the assisted living and memory units is not stated. This will affect staffing levels and parking requirements.

I hope that you will broaden the scope of issues and provide more definitive answers in your draft EIR. I will address my concerns in more detail in the following paragraphs.

Earthquake

One of the drivers of this new project is that the old South Bay Hospital does not meet seismic standards. Yet in your Notice of Preparation, you lessen earthquakes as a concern because the land is not over a major fault. Which is it? Can you address these apparent contradictions? Furthermore, if you are concerned about seismic safety, why have you housed and continue to house, a memory care facility, a fitness facility, and a child care facility in the old hospital? If the health and safety of the users of the facility is at issue now, why haven't all the operations been moved out of the old hospital.

Traffic Issues (Construction)

The area surrounding the proposed facility has a sparsity of four-lane roads that can accommodate the heavy loads projected for this project. South of 190th St, there are two roads, Prospect Avenue and Anza Avenue. Each of these ends as a four lane road at 190th Street. The primary road north of the project is 190th Street. This street cannot be used for heavy loads because of its steep gradient (in excess of 20 percent) in both directions. The primary road south of the Project is Del Amo Blvd, which becomes a two-lane road west of Prospect. So there are no obvious routes for delivery or material removal that do not pass by residential communities. Can you address your plan for material transfer and how you will mitigate any traffic and noise problems? Can you address how these traffic problems affect the safety of people, especially children, near the transportation corridors?

Take the example of concrete delivery. Assuming delivery from the concrete plant at Aviation Boulevard and El Segundo Boulevard, the truck will have to head south on Aviation before turning south on Sepulveda. To get to the site, the truck would have to turn east on Beryl Street (a two-lane road) past Beryl Heights Elementary School, then south on Prospect to the project site. An alternative would be taking Rosecrans Ave east from Aviation, then south on Inglewood, then west on 190th Street. Next the truck would turn on Beryl Street heading west, (a two-lane street) past Towers Elementary School, before heading south on Prospect. About 3000 trucks with 20+ton loads deliveries will need to pass elementary schools. Won't this be detrimental to the education of these children? Are you concerned about their health and safety?

The same problem exists for the delivery of construction materials. What is your plan for alleviating traffic slowdowns and jams owing to the large number of heavy trucks? Can you delineate your material delivery and removal truck routes? Are you also considering alternate routes? Do any of these routes minimize the disturbance to schools and residents?

The problem is largely the same for construction debris. I estimated that 70,000 cubic yards of dirt will be excavated to build the underground parking lot during Phase 1. Although the statement was made that some of it would be used as fill, a large portion would have to be hauled away. The difficulty of transportation described above would apply here as well. What would your plan be for hauling dirt away if the dirt is contaminated? Do you have a hazardous waste disposal plan filed?

About ten thousand truck round trips are needed just for the concrete delivery and dirt removal. What is your estimate for the number of round trips for delivery of steel and other building materials? The large number of trips would put a severe strain on traffic on the surrounding roads for the duration of the project. What is your plan for alleviating or relieving this traffic problem?

Traffic Issues (Residents)

The increased traffic on Prospect, Beryl, and Flagler will depend on how many people will be using the facility. As I stated in the opening paragraphs, the number of people was not adequately described to get to a comparison of “before” and “after”. How many people do you estimate will work at the site daily? How many visitors do you estimate will arrive daily? How many people will visit the Community Wellness Center daily? How many cars will drop off and pick up children at the Child Development Center? How much will this extra traffic affect commute times in the morning and evening rush hours? What is the effect on the stress levels of those forced to endure longer commutes? How will the increased noise affect the health of commuters?

Traffic on Flagler will increase significantly if the entrance/exit to the parking garage is on Flagler. Essentially all the parents dropping off children at the Child Development Center will use Flagler if the drop-off point is in the underground parking facility. Furthermore, traffic through the Pacific South Bay subdivision (just east of the project site) will increase dramatically. As traffic builds on surrounding roads, phone apps (such as Waze) will recommend going through the Pacific South Bay Subdivision. Cars will cut through the neighborhood from Del Amo Blvd via Redbeam and/or Mildred and Towers en route to Flagler and the Child Development Center. There is an elementary school (Towers) with a drop-off/pick-up point on Towers St. The mingling of traffic trying to get to the child-care center and the elementary school will cause traffic jams in the area and endanger young children. Have you considered the danger involved to children that would be created by this traffic pattern? Have you considered the danger to children if people park on Flagler or Beryl as the drop off point if congestion in the parking garage forces this option? Do you think this is healthy living?

The increase of traffic on Beryl towards the Child Development Center will also mean that traffic on Beryl from Flagler to 190th St will also be heavier. The north entrance to Towers Elementary is on this street. During the morning drop-off and the evening pick-up traffic is already congested. Adding the drop-off and pick-up of the Child Development Center will make it worse. Have you considered how this could endanger the safety of the children? Have you estimated how much extra time will be needed to drop children off because of the congestion?

Parking

The existing site has space for 815 cars. The proposed facility has only 690 spaces. This does not make sense. First, I expect that the Fitness Facility and its membership will be expanded. This will mean more parking spaces will be needed. Second, the addition of 360 assisted living care units will mean increased staffing

and visitors which will further strain parking. Have you monitored the current parking situation at the Fitness Facility? Do you expect that reducing the number of spaces, increasing the size of the facility, adding 360 assisted living units, and adding a Community Wellness Pavilion will improve the parking situation?

The problem with insufficient parking is that parking will spill over into the surrounding neighborhoods causing further traffic congestion. Do you have a contingency plan if the parking is insufficient for the number of workers and visitors? Have you considered the traffic back-ups that could occur on both Flagler and Prospect if people have to circle around to find parking?

Where are you planning to have the construction workers park? As you reduce parking spaces by tearing out the existing parking, will construction workers have to find parking in adjacent residential areas?

The lack of parking spaces around the back of the assisted living buildings means that there is no convenient place for EMS personnel to respond to emergencies. They must park on the Prospect side of the property then go by foot to the units that are near Flagler. Is this a wise design to not have parking nearer all of the units? Are you willing to endanger a life in a critical situation where minutes can matter?

Noise

Construction noise will fill the community for nine years. All of the surrounding residential areas will suffer. There are seven schools in close proximity to the project (Beryl Heights, Jefferson Elementary, Towers, West High, Redondo High, Bert Lynn Middle School, and Parras Middle School). It may be difficult for children to concentrate under such noise levels. People will have to shut their windows to mitigate the noise. During the summer, this will mean uncomfortable temperatures for those without air conditioning. The increased noise level for such a long time (9 years) will increase the stress level, which is detrimental to health and well-being. How do you plan to alleviate these stress-induced health problems?

Do you plan to monitor the noise levels during the construction process? Construction equipment generates significant noise in excess of 100 dB. Something like a jack hammer will generate 110 dB.

Demolishing the concrete structure of the old hospital may generate noise in excess of 110dB. Pulverizing the concrete and separating it from the reinforcing bars will also cause deafening noise levels to those homes closest to the job site. The removal of concrete from the reinforcing bars is a time consuming process that can release harmful particles. (see Environmental Factors)

The noise of trucks delivering and taking away construction materials must also be considered. The large number of truck round trips (over 10,000 by my estimate)

passing near schools will generate noise that will disturb schools. What is your plan to mitigate the disturbance to schools and residents?

Furthermore, the Phase 1 construction and demolition of the old hospital will occur when the child-care facility and memory-care facility are on the same site. Your plan is to then build the Community Wellness Pavilion and more assisted living units in Phases 2 and 3. Do you realize that you will be subjecting the residents of the memory care facility and children of the child development center to deafening noise levels in all three phases? Depending on the distance to the noise source, noise levels of greater than 80 dB can be expected. Since both these facilities will be next to the construction, can you guarantee that the noise levels will be safe? Are you willing to destroy the hearing of the patients? At what levels will young children's hearing be permanently damaged by such excessive noise? Will extended periods of noise cause additional problems with the memory care patients?

There is also the noise generated by EMT vehicles when they visit the assisted living or memory care facilities. The sirens will disturb the surrounding neighborhoods. Have you predicted how often this will occur and what the effect of disturbed sleep will be on the surrounding community?

Environmental Factors

The subterranean parking lot and Child Development Center are proposed to be located near the site of an old oil well. According to the Notice of Preparation, hydrocarbon residues have been found in the soil. The spectrum of products was not described, but it is possible that carcinogenic agents, such as benzene, could be found. If this happens, what will be the plan? Have you surveyed parents who would use the Child Development Center whether they would like to have their children housed over an abandoned oil well? Have you evaluated the presence of young children near a source of hydrocarbon residues over extended periods (more than 40 hrs per week, 52 weeks per year)?

Pulverizing roughly 25 tons of concrete from the old South Bay Hospital will generate both noise and dust. Concrete dust, especially the small particles, can cause silicosis. The dust can also exacerbate the conditions of people with asthma, COPD, and emphysema. If one percent of the concrete was transformed into dust, then 500,000 pounds of dust could be borne by the wind to the surrounding communities. What is your plan to mitigate this danger? Are you willing to jeopardize the health of thousands to add just 360 assisted living units?

The old hospital was built in an era when asbestos was widely used. It is highly probable that the building contains asbestos floor tiles, asbestos in the drywall or plaster. Have you tested the concrete and/or the concrete caulking used in the

building for asbestos? What other tests for asbestos have been done? When can we see the results of these tests?

Dust generation is a given in projects such as this. The excavation of about 70,000 cubic yards of dirt for the underground garage, the scraping of ground level parking to get rid of asphalt, and the grading of ground in preparation for building all contribute dust. This dust will generally travel east with the prevailing breeze and can cause health problems in people with respiratory conditions. Have you estimated the amount of dust that will drift into the surrounding areas, particularly into Towers Elementary? If there are contaminants found in the excavated dirt around the old oil well, what is your plan for dust containment? Contaminated dust spreading into the surrounding areas will certainly be detrimental to health.

Aesthetics

The proposed building will tower 90 feet above houses only 75-ft away. Have you considered what this will do to the neighborhood? The building will block the sun for roughly a quarter of the day in the afternoon. The glass panels will also reflect the morning sun into the homes below. So for a quarter of the day the homes will be super bright and for a quarter of the day, the homes will be in shadow. The tall and wide building will also block the westerly wind from reaching houses in its wake depriving the homes from the cooling sea breezes. Have you assessed how these changes might affect the mental health of the residents to the east?

Summary

Has anyone looked at alternatives, like retrofitting the old hospital to meet seismic standards? Other structures, such as freeway on-ramps, office buildings, and medical buildings, have been retrofitted in the LA area. Most of these retrofits involve wrapping columns to prevent buckling in an earthquake. Other alternatives, such as moving the assisted living facility elsewhere could be considered. There is no reason that this has to be in the same location as the other facilities currently operating at the old South Bay Hospital. Have you considered other locations for this facility?

It seems ironic to me that an organization striving to improve the health of people is planning a project that could have deleterious effects on the health and safety of thousands of people in the community. The primary victims will be young children, the elderly, and the ill. This project will also affect the mental health of the surrounding community. Have you taken into account what this 15-year project will do to people's well being?

Preparing this response and attending the scoping meetings have created a high level of stress in our community. My wife and I have not been sleeping well because we are concerned about the detrimental effects on our neighborhood. Does it justify making thousands miserable, so you can build 360 assisted-living units?

BCHD should have been able to identify all of the issues I have raised here before the NOP was published since BCHD had hired an environmental firm specializing in handling these issues. Can you explain why BCHD failed to do this? Why have you failed to point out the myriad of problems that will affect the health and safety of the surrounding community?

Kenneth T. Yano
19921 Tomlee Ave
Torrance, CA 90503

July 28, 2019

Mr. Nick Meisinger, Environmental Planner
Wood Environment & Infrastructure Solutions, Inc.
9210 Sky Park Court, Suite 200
San Diego, CA 92123
email: EIR@bchd.org

Dear Mr. Meisinger,

I have questions and concerns regarding the impact of the Beach Cities Health District (BCHD) Healthy Living Campus Master Plan project that need to be addressed in the Environmental Impact Report (EIR):

Aesthetics

1. How many feet above the intersection of Towers and Flagler will the proposed building be?
2. How many feet separate the proposed building from the property line on the east side? Does the proposed project satisfy all setback requirements in all jurisdictions?
3. What will be the length of shadows cast by the proposed building on structures and homes to the east during spring, summer, winter and fall?
4. What intensity of glare will the proposed building and its windows cast on homes and structures to the east during the morning and to the west in the afternoon? Will this increase temperatures anywhere in the area? If so, where?
5. What trees will be removed during construction? Will there be green space separating the proposed site from the homes to the east and the businesses to the north? If so, when will this green space be planted?
6. What are the prevailing winds in the area? Does the proposed facility block winds coming off the ocean to homes and structures to the east? If winds are blocked, what temperature changes could occur to any homes/structures in the area?
7. The proposed project is divided into 3 phases over at least a 9-year construction period. What will this construction site look like over the 3 phases? Will it just be exposed dirt?
8. What will be the impact on residents from increased temperatures, less light, less vegetation, and blockage of wind?

Biological Resources

1. An assisted-living facility with up to 545 occupants is proposed. What medical/biological wastes will be generated? How will they be disposed of? How will exposure to any toxins affect the elderly, the ill and the young in the surrounding neighborhoods and how can negative impacts be prevented?
2. If the old South Bay Hospital building is to be demolished, what medical/biological wastes will have to be disposed of? Will they be handled as hazardous waste meeting all government disposal regulations? How will that impact those people downwind of the project?
3. What carcinogens must be disposed of in the demolition of the buildings on the proposed site? How will exposure to carcinogens be prevented?

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Geology and Soils

1. What are the components of the dirt on the proposed site? What amount of sand is in the dirt?
2. Will pilings be needed on any portion of the site to stabilize the foundation? If so, how would they be inserted? What noise levels would be generated by pile-drivers? For how long?
3. What guarantees can BCHD provide that the slope to the east of the building site is stable, especially since it is proposed that part of that slope be excavated for an underground parking garage?
4. An old capped oil well sits on a vacant lot at the corner of Flagler and Beryl. The BCHD proposes putting a child development facility on or near that corner. What contaminants are in the soil? What carcinogens are in the soil? If so, how will that soil be removed? How much soil would have to be removed? What regulations must be followed in removing contaminated soil? How does BCHD guarantee the safety of the children at the facility if there is contaminated soil?
5. To build the proposed parking garage, a large amount of soil must be removed. How much soil will be removed? How many truckloads would it require to remove that soil? Which roads would these trucks have to use in the area? Over the entire time of the project, how will soil removal, truck traffic, etc. impact people's health; safety; air quality; exposure to hazardous waste, carcinogens, toxins, dust, or any other dangerous substances; quality of life?

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Hydrology and Water Quality

1. If water is used to keep down dust during the proposed 9-plus years of construction, how many gallons of water would be required?
2. Would there be water runoff and if so, how many gallons per day?

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3. Beryl Avenue has a steep slope and often floods during rains. Would any water runoff flow down Beryl from the proposed site?
4. Would removal of the capped oil well in any way affect water quality in the area?
5. Are there water pipelines in the areas of excavation? If so, how will they be protected from any contaminants? If any pipelines are broken, who is the responsible party for fixing them and who would be liable for any damages to property or loss of water service for any amount of time? How will that water usage impact the viability of water resources in surrounding neighborhoods, including Torrance?

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Noise and Vibration

1. The proposed plan calls for pulverizing concrete on site. How many tons of concrete will be pulverized? What tools will be used to pulverize the concrete on site? Will jackhammers be used? How many days will it take to pulverize the concrete? How many hours each day will concrete be pulverized on site?
2. Pulverizing concrete sounds like a noisy process. What decibels of noise will be emitted? How far will the noise travel?
3. There are a number of schools within blocks of the proposed site (Bert Lynn, West High, Towers Elementary, Beryl Heights, Jefferson, Perras and Redondo Union schools.) If concrete is to be pulverized at the proposed site, what noise levels will reach the schools in the area? For how long a period? For how long each day that concrete is to be pulverized?
4. What noise level is expected at the Child Development Center and the memory care units which will be located right at the construction site? Are there federal, state and local government regulations regarding the maximum noise levels acceptable for children?
5. What vibrations are produced by the construction trucks (both when empty and when full of materials) to be used on this project? Will these trucks pass by or near schools? What impacts and harm could be caused by vibrations and noise and how will they be prevented?

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Greenhouse Gas Emissions

1. How many concrete trucks will be required on this project? How many loads of concrete will they carry in total? (Is 3,000 loads of concrete the correct number? If not, what is the projected number?) How many dump trucks and any other type of vehicles will be required to remove the dirt for the proposed underground parking garage? (Is about 70,000 tons of dirt the correct number? If not, what is the amount of dirt that must be removed?) How many miles will be traveled by the total number of vehicles and what will be the total greenhouse gas emissions of these vehicles?
2. If these trucks pass by or near schools or residential communities, do they have to

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meet any EPA standards? What are those standards? How are these trucks monitored to ensure they meet all applicable environmental standards?

3. If each truck does not meet environmental standards, is there a procedure for stopping the use of a certain truck or stopping the project until all vehicles comply?

4. What are all the types of emissions that will occur during the lifetime of the project? How will each type of emission affect the health of people, especially the old, the young and ill or frail people over the lifetime of the project?

5. How many old, young and frail people will be exposed to these emissions over the project's lifetime?

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Land Use and Planning

1. BCHD has distributed a number of brochures and other marketing/public-relations materials depicting what the buildings will look like upon completion. The site sits in the middle of a largely residential area. Does the large scope of the for-profit assisted-living facility fit in with the surrounding neighborhood? Have surrounding "neighbors" been polled as to its suitability? If so, how many households favored the building design and how many households opposed the building design?

2. BCHD is a non-profit organization tasked with improving the health of the beach cities (Manhattan, Hermosa and Redondo Beach). How does a for-profit assisted living facility fit into its charter? Can land acquired by a non-profit organization be used by a money-making organization? Who or what organization will run the assisted-care facility and how much money does this organization project to make in its first 5 years of operation? How much money would go to BCHD? How would BCHD use that money?

3. If BCHD is supposed to serve all 3 beach cities, why are these proposed facilities not more centrally located to these cities? How far will Manhattan Beach residents have to drive to drop off children at the development center or use the fitness facility?

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4. How many square feet will the child development facility be? How many children will this facility accommodate?

5. How many square feet is the fitness facility? How many people will use this facility?

6. How many square feet is the for-profit assisted-living facility? What is the maximum number of residents that this proposed facility could handle? What is the proportion of the maximum number of residents in the assisted-living facility to the total number of residents in the 3 beach cities? Is this the best land use to benefit the maximum number of beach cities residents?

7. A large part of the proposed facility backs up onto Torrance streets (Flagler Lane and Flagler Alley) and a Torrance residential neighborhood. Has BCHD or anyone it has hired or anyone associated with the assisted-living facility contacted or consulted with anyone in the Torrance government or planning department? If so, who and when? How has Torrance been included in land-use decisions?

8. As currently depicted, there is little to no green space to the east of the proposed buildings. How many square feet of green space would separate the building from the residents to the east and south?

9. There appears to be green space surrounding the proposed fitness facility. Would anyone, including Torrance residents, be able to use that space for recreational or health purposes (such as walking, tai chi, picnics, etc.)? This green space is right in front of the assisted-living facility so how are people to enjoy the space looking right into the windows of a care facility? Wouldn't public use of the space also disturb residents?

10. This appears to be the worst location for these facilities to serve beach cities residents. Have you addressed finding better locations for this project to serve your constituents? What other locations have been considered? Why did you decide this was the best location?

Population and Housing

1. How many people will reside at this proposed site when completed?

2. How many people will work at this site on weekdays? On weekends?

3. How many visitors are projected each day? (This would include family, doctors and other medical-support personnel visiting residents of the proposed assisted-living facility.)

4. How will the increased number of residents, workers and visitors impact traffic, quality of life, crime, air pollution over the entire lifetime of the project?

5. This project has and will cause enormous stress to myself and many other residents in the communities surrounding it. What is BCHD's plan to mitigate or eliminate this stress?

Transportation

1. Traffic is already challenging for those people living in the area. Has there been a traffic study during morning commute hours, school start and end times, lunchtime, and evening commute hours in the areas on the north, south, east and west sides of the proposed facilities?

2. Right now the entrance to the proposed underground parking garage is on Flagler Lane/Flagler Street. What is the projected total number of cars that would be using that entrance on a weekday? On Saturday? On Sunday?

3. What is the total number of people who will be working at the fitness center? The child development center? The assisted-living facility? How many of these workers will be using the parking garage?

4. Will there be a drop-off point for the child development facility? If so, where?

5. Is there a plan to prevent people from cutting through the Torrance residential streets of Towers, Flagler, Redbeam and Mildred to reach the parking garage entrance or to drop their children at the child development facility?

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6. There are several blind turns in the area of the parking entrance. Has a traffic analysis been done for different times of the day on the Towers “curve” and the Redbeam “curve”?

7. Has there been a traffic analysis done for Prospect Avenue on the west side of this proposed project?

Mandatory Findings of Significance

1. If I understand correctly, BCHD hired Mr. Ed Almanza as a consultant. He in turn hired Wood Environment & Infrastructure Solutions, Inc., to prepare the Environmental Impact Report.

2. Is BCHD paying Mr. Almanza? Is BCHD paying Wood? Is Mr. Almanza paying Wood? Is there anyone not being paid directly or indirectly by BCHD analyzing the environmental impact of this 9-year (or more) demolition/construction project?

3. Has there been any independent or government analyses of the geology at this site?

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4. Have any independent or government-sponsored traffic analyses of the major streets bordering this site been done?

5. Has an independent or government air quality analysis been done?

6. Does BCHD have funding to complete this project? What happens if there are not enough funds to complete this project? Does the site become a partially-filled dirt lot, an eyesore or worse?

7. How can a non-profit organization such as BCHD (with an operating budget of \$11 million —according to the BCHD website) afford to build a 420-unit assisted-living facility, a child development center and a fitness center? How much money is this really going to cost and where is this money coming from? What happens if the funding runs out? Will the neighborhood be left with an unfinished eyesore, a pile of dirt, or worse?

Air Quality

1. How many tons of concrete will be pulverized on site? What percentage will end up as dust? How much of that dust could become airborne? How far can that dust be carried?

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2. Will dust from the proposed site affect the children in the child development center (since it is being built in Phase 1)? How could it affect children’s health?

3. How do you plan to ensure that no dust reaches surrounding schools and residential areas? What air quality monitoring systems are planned throughout the entire project?
4. If any dust escapes the proposed site, what diseases can it cause or exacerbate? Can it cause silicosis? Will people with COPD, asthma, respiratory or lung diseases be affected by this dust? How?
5. In excavating the underground parking garage, how much and what type of particulate and contaminants will be released into the air?
6. Will all releases of dust and/or contaminants fall within EPA guidelines? Is there a plan in place to guarantee that EPA guidelines are met?
7. In the Notice of Preparation (NOP), BCHD indicates work at the site will stop for 2 years so BCHD can obtain funding for the next phase. What will be the condition of the site for these 2 years (or longer if funding is not obtained)? Will there be dirt, dust or other material being blown about? Who will pay for monitoring air quality during the time between construction/demolition phases?
8. Can any escaped dust or dirt reach Sunnyglen Park, Entradero Park, Dominguez Park and dog run, West High athletic fields? Will there be monitoring at each of these sites as well as any other public use spaces?
9. Does BCHD have a plan to determine levels of pollutants and particulates at which the young, the old and the sick will suffer an impact on their health?
10. When those levels of pollutants and particulates which adversely affect health are detected, will BCHD stop construction?
11. Has BCHD notified the South Coast Air Quality Management District of this EIR?
12. Diesel trucks emit diesel fumes which contain particulate matter. How many diesel truck trips (one-way and round-trip) will be required over the lifetime of this project?
13. What other toxic and hazardous air emissions will be caused by this project, including but not limited to: sulfur dioxide, lead, ozone, nitrogen dioxide, carbon monoxide, and fine particulate matter?

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Hazards and Hazardous Materials

1. Will any of the following materials be located at or dispersed from the demolition/construction site: hydrocarbons, asbestos, mercury, lead and/or leaded paint, concrete dust?
2. What other hazardous materials might be released into the air, the ground or any water supplies because of construction/demolition?
3. What is BCHD's plan to prevent the impact of exposure to all of the above hazardous materials over the entire life of the project?

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Public Services

1. How long will it take for paramedics or other emergency services to reach the residents in the assisted-living facility located behind the fitness center? How many calls for emergency services are expected each year at that proposed facility? Does Redondo Beach pay for these services? How much is projected for the first year alone?
2. Will there be an increase in noise pollution due to sirens?
3. Has there been an analysis of the impact of increased crime as a result of construction, underground parking, fields left vacant, or any other causes over the lifetime of the project? I assume there will be night shifts working at the assisted-living and memory-care facility so would the parking garage be open 24 hours a day? Have there been any studies if this would be inducive to crime or use by the homeless?
4. With construction traffic spread over a 9-plus year period, what effect on road conditions will there be? Who pays for road repairs? What roads will be most severely impacted?
5. What would be the impact on police services over the lifetime of the project? What would be the impact on police services for the safety of the underground parking garage?
6. What is BCHD's plan to prevent the adverse impact on public services (police, fire, emergency services, paramedic visits, traffic control, traffic violations and court appearances, and all other public services)? Will there be additional costs to local fire, police, emergency responders, or any other public service? Who would pay the cost for any additional services?

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Sincerely,

Susan Yano
19921 Tomlee Avenue
Torrance, CA 90503

WRITTEN COMMENT FORM
BEACH CITIES HEALTH DISTRICT
HEALTHY LIVING CAMPUS MASTER PLAN EIR

If you would prefer to submit written comments, please complete this written comment form. Continue on the back of the form or attach extra pages, as necessary.

In order to be addressed in the Draft Environmental Impact Report (EIR), written comments must be received by the close of the public comment period at 5:00 PM on July 29, 2019.

NAME: Glen Yokoe

TITLE/ORGANIZATION: Torrance resident (42 yrs)

ADDRESS: 19307 Tomlee Ave. Torrance 90503
(Street) (City/State/Zip)

—COMMENTS—

A big concern is the air we, as residents will breathe. Will analysis and continued monitoring of be conducted and reported to us. Will the City of Torrance, L.A. County, the state of CALIF or the EPA be involved?

If we have concerns/complaints during entire process will there be a live person to talk to about these issues?

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Please hand this completed form to Wood staff at the sign-in table or mail to:

Mr. Nick Meisinger, Environmental Planner
Wood Environment & Infrastructure Solutions, Inc.
9210 Sky Park Court, Suite 200
San Diego, CA 92123

Written comments may also be e-mailed to:
EIR@bchd.org

WRITTEN COMMENT FORM
BEACH CITIES HEALTH DISTRICT
HEALTHY LIVING CAMPUS MASTER PLAN EIR

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NAME: Nancy Yokoe

TITLE/ORGANIZATION: _____

ADDRESS: 19307 Tomlee Ave 90502
(Street) (City/State/Zip)

~~COMMENTS~~
Will there be a signal at Redbeam and Del Amo. Will there be a signal at Beryl and Fladler.

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Have there been studies done on the soil and buildings for asbestos, lead or any toxic materials?

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How high will building be.

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Hours of work 8-5 no weekends.

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How many entrances into parking lot?

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San Diego, CA 92123

Written comments may also be e-mailed to:
EIR@bchd.org

—COMMENTS CONTINUED—

Aren't there going to be fewer parking sites? You can hardly find a parking site now.

Martinez, Oscar

From: Glen and Nancy Yokoe <ninjabytes@hotmail.com>
Sent: Monday, July 29, 2019 1:25 PM
To: Martinez, Oscar
Subject: Fw: BCHD Proposed 15 Year Project

WARNING: External e-mail

Please verify sender before opening attachments or clicking on links.

Dear Mr. Martinez,

I am sending you an email that we wrote to Mr Nick Meisinger, NEPA/CEQA Project Manager, regarding the BCHD proposed project that will dwarf, nearly engulf and probably negatively impact our West Torrance neighborhood. I hope you will support our efforts at oversight and concern.

Respectfully, Glen and Nancy Yokoe

From: Glen and Nancy Yokoe
Sent: Monday, July 29, 2019 2:06 PM
To: eir@bchd.org <eir@bchd.org>
Subject: BCHD Proposed 15 Year Project

Dear Mr Meisinger,

We are long time Torrance residents(42 years) of the northern Tomlee Ave. cul de sac, the rear of our home facing the intersection of Beryl and Flagler. We live here to enjoy the health benefits of fresh ocean air provided by a near constant sea breeze.

But, that same wind that benefits our health and wellbeing will soon be a conduit for noise and pollution, especially from this proposed 3 phase, 15 year behemoth project.

No matter what assurances are given to residents of West Torrance, it's inevitable that some evaluations, procedures, and monitoring will slip through the cracks without anyone's knowledge. This could negatively impact our neighborhood for years, if not decades.

I have spoken to and read all my neighbors concerns and completely agree with their assessments and concerns. I firmly believe more thought and perhaps replanning to a downsized and less intrusive project must be considered.

Their BCHD stated purpose is to promote healthy living and stress reduction. Such a monstrous and prolonged endeavor, with likely environmental harm, totally invalidates and refutes the BCHD fundamental purpose.

Respectfully, Glen and Nancy Yokoe

From: EIR <eir@bchd.org>
Sent: Friday, August 02, 2019 1:24 PM
To: Meisinger, Nick
Subject: Fw: BCHD Healthy Living Campus Master Plan -Environmental Impact Report Comments

Importance: High

From: Lynne Yorita <lynneyorita@gmail.com>
Sent: Thursday, July 25, 2019 4:45 PM
To: EIR <eir@bchd.org>
Subject: BCHD Healthy Living Campus Master Plan -Environmental Impact Report Comments

Nick Meisinger, Environmental Impact Planner
Wood Environment & Infrastructure Solutions, Inc.
9210 Sky Park Court, Suite 200
San Diego, CA 92123

We are the homeowners of 20102 Tomlee Avenue in Torrance, and are writing to express our concerns regarding the redevelopment of the Beach Cities Health District (BCHD) campus. While we support the need for additional services and facilities, we are deeply concerned about the scope of the project and the direct impact it will have on traffic and safety of our particular neighborhood.

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Of extreme worry is the vehicle entrance to the subterranean parking along Flagler Lane. The Flagler Lane entrance to the subdivision intersects Towers Street with the neighborhood access to Towers Elementary School. Many parents and caregivers are accompanied by younger siblings when dropping off and picking up children from the school. We have a grandson that will be attending Towers Elementary in a few years. We really don't need or want non-residents cutting through the subdivision to access the BCHD campus. We would prefer all access to the campus be confined to Prospect Avenue. There should not be any entrance or exit on Flagler Lane.

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We are also concerned about the noise and traffic created by construction of the project. The neighborhood is currently very quiet and peaceful at all times with the occasional siren of an emergency vehicle on Prospect Avenue. This is a valued quality of the neighborhood.

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Respectfully submitted,

Steven Yorita
Lynne Yorita
20102 Tomlee Avenue
Torrance, CA 90503
lynneyorita@gmail.com

Catherine Bem

From: Laura Zahn <myhomecastle@yahoo.com>
Sent: Monday, July 22, 2019 11:20 AM
To: EIR
Cc: myhomecastle@yahoo.com
Subject: Beach Cities Healthy Living Campus Master Plan

Since your "organization" is a business and ALL business want to be profitable what is your organization's intention to FILL empty rooms and or beds IF there is not enough Seniors (elderly folks) to meet the profitability threshold that is needed to be successful?

Other SIMILAR type "campuses" whatever they may be called...Senior Centers, Senior Housing, Assisted-Living, Retirement Centers etc., utilize a little known and OFTEN unidentified OPTION of filling those rooms, those beds with NON- Senior Folks. Folks that say... are Drug Addicts, Alcoholics, folks that have DEEP mental and emotional issues OR other conditions that render them incapable of living independently within society.

WHAT assurance can your organization provide to the residents... the TAX paying residents of the City of Redondo Beach and then the GREATER South Bay Area that your organization will NOT be providing live-in habitation for those mentioned above?

The cost to live at a facility such as your organization is presenting will be beyond what most LOCAL residents and or their family members can afford. This IS fact...

However IF... your organization INTENDS to "rent" rooms and or beds to individuals who ARE Drug Addicts, Alcoholics, and those that have DEEP Mental and Emotional issues, OR other conditions that render them incapable of living independently within society WHO CAN ACCESS funds from County, State and Federal agencies that PAY for folks with these "conditions" THEN... the playing field of Providing housing FOR SENIORS is tilted.

IF folks live and or "stay" at your facility for an undetermined period of time OR for a determined period of time who can because of their "condition" ACCESS Government (local, State, Federal) funds IS this really being fair OR honest to the Seniors who ONLY have their retirement funds, their Pension funds, their investment funds, and or their families income to finance their accommodations? I believe not!

Other cities across the state have REALIZED only after-the-fact that what they were TOLD was to be a nice housing place FOR Seniors ended up housing Drug Addicts, Alcoholics, mentally challenged folks and or others, UNDER the ruse... "well there were not enough Seniors to FILL the rooms/beds...so we took in "other folks" to meet capacity". Those cities and their residents are appalled that their "neighbors" are not all Senior Citizens. They are appalled that the facility they were TOLD was FOR Seniors now has those from society that have truly fallen OFF the rails.

PLEASE assure the tax paying residents of Redondo Beach and then the Greater South Bay Area that WHEN your organization says SENIOR it means 100 percent those 55 and better WHO were once responsible members of a civil society.

Do NOT place the BURDEN of housing residents that may cause harm to themselves or others due to their condition(s) on the residents and City of Redondo Beach.

Respectfully,

Laura D. Zahn
2735 190th Street (19)
Redondo Beach, CA 90278

Sent from my iPhone

WRITTEN COMMENT FORM
BEACH CITIES HEALTH DISTRICT
HEALTHY LIVING CAMPUS MASTER PLAN EIR

If you would prefer to submit written comments, please complete this written comment form. Continue on the back of the form or attach extra pages, as necessary.

In order to be addressed in the Draft Environmental Impact Report (EIR), written comments must be received by the close of the public comment period at 5:00 PM on July 29, 2019.

NAME: LORI ZAREMSKI

TITLE/ORGANIZATION: Dr.

ADDRESS: 3221 Gibson Place Redondo Bch
(Street) (City/State/Zip) 90278 CA

—COMMENTS—
—NOW AWFUL!

- 1 | Concerns: TRAFFIC, Congestion, Impact of Public
- | Services, Fire Dept overwhelmed, Many
- | trips by ER through Areas, 15 years of
- | Construction - Any newborn child whole
- childhood & adolescence till sophomore
- year of HS in a construction zone
- | • Senior housing should be equally distributed
- | • TRIPS in's out for 1,000 people per day

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Wood Environment & Infrastructure Solutions, Inc.
9210 Sky Park Court, Suite 200
San Diego, CA 92123

Written comments may also be e-mailed to:
EIR@bchd.org



Concerns:

—COMMENTS CONTINUED—

- ◻ Z-1 ◻ The exhaust pouring out of the cars caught in traffic daily
- ◻ Z-1 ◻ Out of Area people move into the campus displacing RB residents
- ◻ Z-1 ◻ Need 3 separate EIR's to address each separate phase
- ◻ Z-1 ◻ The Seniors will generate more impact on all local hospitals - what will that do to the local
- ◻ Z-11 ◻ The BCTD has not demonstrated good management & has run out of money & now wants to go into the Real Estate Business
- ◻ Z-1 ◻ This has not been a transparent

From: EIR <eir@bchd.org>
Sent: Thursday, July 25, 2019 10:05 PM
To: Meisinger, Nick
Subject: Fw: Proposed construction at Flagler and Beryl

From: LINDA Zelik <linzelik@gmail.com>
Sent: Sunday, July 21, 2019 11:44 AM
To: EIR <eir@bchd.org>
Subject: Proposed construction at Flagler and Beryl

Dear Mr. Meisinger;

My husband and I live at 19405 Linda Drive, right behind Towers Grade School. We are about 1/4 mile, as the crow flies from the proposed site.

If you proceed with this enormous building it will severely impact traffic in our neighborhood. Not only all the residences which are east of the location

but the many schools surrounding the area as well. In addition to the two Torrance schools in the vicinity, Towers and West High. Additionally, there are many Redondo Beach

schools which will be severely affected due to the increased volume of traffic. These include Redondo High, as well as several primary and middle schools in the vicinity.

Our other concern is how it will restrict our ability to get into and out of our neighborhood. I understand that you will be building underground parking for 700 cars, is that correct?

This neighborhood simply cannot support that amount of traffic and it's resultant congestion. Would you want this project built in your neighborhood?

Please reconsider this plan! There are already sufficient convalescent hospitals and residences in the vicinity which accommodate the needs of the population.

Thank you, Linda Zelik

From: EIR <eir@bchd.org>
Sent: Friday, August 02, 2019 1:31 PM
To: Meisinger, Nick
Subject: Fw: Environmental Impact of Proposed BCHD Development at Flagler & Beryl Sts.

From: Joseph Zelik <rtanque@verizon.net>
Sent: Saturday, July 27, 2019 3:40 PM
To: EIR <eir@bchd.org>
Subject: Environmental Impact of Proposed BCHD Development at Flagler & Beryl Sts.

Mr. Meisinger:

My wife and I live at 19405 Linda Drive, adjacent to Towers Grade School and less than 1000 ft. from the proposed new BCHD site which borders on Flagler and Beryl Streets.

At present, west bound traffic congestion in the mornings makes exiting our neighborhood slow & difficult. Some of this congestion is due to the many schools in this area. Many children have to cross streets to walk or bicycle to school. This enormous BCHD development will greatly add to this traffic congestion all day long and make the streets much more hazardous to children.

Another major concern is greatly increased traffic cutting through our development from del Amo Ave. to Beryl St. to get to the proposed development. Besides the noise & aggravation to the residents, this would greatly increase the probability of someone getting hit by a car.

From our vantage point and that of many of our neighbors, the proposed development will be a giant eye-sore looming above us on the hillside to the west. It may also cut off the ocean breezes that we so much love in this neighborhood.

This area simply cannot support the amount of traffic, congestion, incursion and concentration of people your development will bring.

Please reconsider this plan! There are already sufficient convalescent hospitals, personal care and senior residences in the vicinity which accommodate the needs of the population quite well.

Sincerely,

Joseph Zelik

From: EIR <eir@bchd.org>
Sent: Friday, August 02, 2019 1:27 PM
To: Meisinger, Nick
Subject: Fw: BCHD Healthy Living Campus Master Plan

From: Toni Ziegler <toniz25@yahoo.com>
Sent: Friday, July 26, 2019 7:43 AM
To: EIR <eir@bchd.org>
Subject: BCHD Healthy Living Campus Master Plan

Dear Mr. Meisinger,

Thank you for the opportunity to respond with our strenuous support of the project. There is obviously a need for the improvements proposed, especially those related to senior citizens.

We are very disappointed with our neighbors who have been leaving anonymous flyers on our doorstep with uninformed and erroneous negative claims about the project. They seem to think that, because the project will not be completed for 15 years, there will be continuous construction during that period. They obviously don't understand the concept of "phasing." Also, dust and noise will be required to be mitigated to acceptable levels as part of the developer's responsibilities.

It seems that this type of information should be made available to our community members, so that they are aware that the project will not be a detriment to our neighborhood. Perhaps, another direct mailing could address these issues.

Sincerely,

Jon and Antoinette Ziegler
19426 Mildred Avenue
Torrance, CA 90503

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