

June 8, 2021

To Whom it May Concern,

Please accept the attached comments from the Sierra Club PV/South Bay Group for the BCHD Healthy Living Campus DEIR.

Yours truly,

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Sierra Club, Palos Verdes-South Bay Regional Group

Comments for the Draft EIR

BCHD Healthy Living Campus Master Plan

State Clearinghouse No. 2019060258

2.5.1.5 Sustainability Features

MC-1 **Comment:** Explain why only 25-50% of rooftop area can be used for photovoltaic solar energy generation and solar hot water heating.

SECTION 3.2, AIR QUALITY

Air Quality Hazards affect everybody, but especially children and sensitive receptors.

Air Quality Hazards Affect children and sensitive receptors

The proposed project would expose thousands of residents, the public, and nearby schools to a minimum of 5 ACTIVE years of demolition and construction with exposure to dust and diesel exhaust. It is located in a densely populated area and would affect a large population.

The DEIR states that sensitive receptors would include local residences less than 100 ft away. In addition to nearby residents, there are schools a little farther away that would be exposed to air pollution from construction activities.

- MC-2
- **Towers Elementary school** with 600+ school children aged 4-10, teachers and staff are located just **350 ft. downwind** from the demolition and construction site
 - **Beryl Heights Elementary** school with 450+ school children is **~900 ft. away**
 - **Redondo Union and West High** schools with over 5,000 students combined are **0.3 and 0.7miles away.**

Table 3.2-10 Shows that the unmitigated construction Diesel Particulate Matter (DPM) emissions would exceed SCAQMD thresholds for cancer risk (1.0E-05 or 10 in a million) for nearby sensitive receptors during Project construction activities. The DEIR relies on use of Tier 4 diesel engines for construction equipment to reduce modeled DPM emissions for mitigation, to reduce the cancer risk from DPM below SCAQMD thresholds.

Comment: Explain how use of Tier 4 engines will be enforced.

MC-3 The DEIR states that diesel construction equipment and haul trucks would be prohibited from idling for longer than 5 minutes pursuant to California Idling Regulations as defined by CARB, which prohibits heavy duty diesel vehicles with a Gross Vehicle Weight Rating of 10,000 pounds or more from idling for longer than 5 minutes.
Page 3.2-36
Comment: The DEIR must explain who onsite will be enforcing this idling prohibition.

3.2.4 Project Impacts and Mitigation Measures

The DEIR states:

MC-4 Unmitigated localized construction emissions from the proposed Project would exceed SCAQMD's LSTs for PM10 and PM2.5 (fugitive dust). However, implementation of MM AQ-1 includes watering of exposed soil surfaces three times daily, which would achieve a fugitive dust reduction of 74 percent, and prohibiting demolition when wind speed is greater than 25 mph, which would achieve a fugitive dust reduction of 98 percent. Implementation of MM AQ-1 would reduce on-site construction emissions for PM10 and PM2.5 below the SCAQMD's LSTs.
Page 3.2-34

Comment: Wind can increase without warning, and contractors are typically not willing to stop work quickly. Please provide the professional individual and credentials for on-site enforcement to control dust migration.

MC-5 **Comment:** This is using a lot of water. Please provide methods to reduce water use while still decreasing off-site dust and particulate matter migration.

The Converse Phase II ESA Report states that PCE was detected in 29 of the 30 soil-vapor samples, with a maximum concentration of 2,290 ug/m³ in sample BC14-15.

MC-6 **Comment:** The DEIR does not address the issue of preventing PCE, volatilized from soil during excavation activities, from entering the air in harmful amounts that would be harmful to nearby sensitive receptors.

The DEIR Page 3.8-33 says:

MC-7 MM HAZ-2b Soil Vapor Monitoring. During soil disturbance activities with the potential to disturb tetrachloroethylene (PCE)-contaminated soil, soil vapor monitoring shall be conducted by the construction contractor using a photoionization detector (PID) 10.6 or 11.7 eV lamp. Use of the PID shall ensure that the Occupational Safety and Health Administration (OSHA) exposure limits for PCE and other volatile organic compounds (VOCs) are maintained. In the event that the OSHA exposure limits are exceeded, work within the confined space would be temporarily stopped until the use of a Soil Vapor Extraction (SVE) vacuum blower reduces it to below this limit

(see MM HAZ-2c)

MC-7
(cont.)

MM HAZ-2c Soil Vapor Extraction (SVE) Equipment. Use of an SVE vacuum blower (e.g., regenerative blowers, rotary lobe blowers, rotary claw blowers, centrifugal fan blowers, etc.) shall be implemented during construction within confined spaces, as necessary, to maintain Occupational Safety and Health Administration (OSHA) exposure limits or trichloroethylene (PCE) and other volatile organic compounds (VOCs).

Comment: It is important to protect workers. However, blowing unhealthy concentrations of perchloroethylene or other VOCs into the air exposes people downwind to these vapors. The exhaust from the blowers should go through activated charcoal or otherwise treated to avoid exposure to residents of harmful VOCs.

MC-8

Comment: MM HAZ-2c refers to trichloroethylene as PCE. Actually, PCE is the abbreviation for perchloroethylene (tetrachloroethylene), which is the VOC found in high concentrations in the soil vapor samples.

3.3 Biological Resources

3.3.3 “However, street trees and other landscaped trees throughout the cities provide potential nesting and roosting sites for resident and migratory birds.”

Significant Impacts:

Over 100 mature trees are to be removed, just for Phase 1.

The proposed position of the massive facility and other structures, planned to be built out to the perimeter of the property, relies on removing HALF of the trees on site.

Tree removal approximately:

MC-9

20 trees along Flagler Lane, north of Towers Street. (*must have permit approval from Public Works, City of Torrance)

60 trees along the northern perimeter of the campus to clear for the city block long RCFE

20 trees along Diamond Street for the SCE Substation Yard.

DEIR states:

“The Tree Inventory Report prepared by Carlberg Associates (2019) concluded that 219 of the 228 of the landscaped trees located on the Project site are in good condition.

...redevelopment of the Project site would require the direct removal of approximately

half of the existing landscaped trees as well as a number of shrubs and other non-native ground cover.

MC-9
(cont.)

Additionally, adjacent vegetation, not proposed for removal, could be indirectly impacted by intrusion into their root zone.”

Loss of 100 mature trees will increase CO2 (a major contributor to the greenhouse effect) and deprive birds of nesting areas.

Comment: DEIR fails to adequately mitigate the reduction or loss of trees that will affect the environment and migratory birds’ nesting areas.

MC-10

Comment: Use of local native plants rather than drought-tolerant plants from other parts of the world would greatly increase habitat value for wildlife.

3.5 ENERGY

Projected natural gas usage would be 48,007 Therms/year, more than twice the existing usage.

MC-11

Comment: Natural gas usage needs to decrease rapidly to avoid further global warming. Constructing new buildings that use natural gas instead of electricity would probably continue use of gas for the lifetime of the building, since retrofits are not easy.

The project should minimize use of natural gas and use heat pump HVAC, and heat pump water heating to back up solar water heating. Please provide provisions to decrease usage.

3.7 Greenhouse gas emissions

Greenhouse gas emissions are significant:

Table 3.5-6. Comparison of Project-related Diesel Fuel Consumption to Annual County Diesel Fuel Consumption (Gallons)

Annual Los Angeles County (2018) 228,000,000

Total Project Construction

(including Phase 1 and Phase 2) 1,910,839

Source: CEC 2018a.3.5-18

MC-12

Comment: Burning about 2,000,000 gallons of diesel fuel is significant. Please provide methodology to lower greenhouse gas emissions.

3.7_9

MC-13 | “By 2020, California shall reduce GHG emissions to 1990 levels”

MC-13 (cont.) Please provide measures to ensure that California, and Redondo Beach, will meet these levels with the increases shown with the project.

3.8. Hazards and Hazardous Materials

MC-14 **Comment:** Although the DEIR refers to information from the Phase I and Phase II Environmental Site Assessment Reports from Converse Consultants, it does not provide an easily findable link for the public to read these reports.

5.0 ALTERNATIVES

DEIR is required to analyze a “Do Nothing” alternative.

MC-15 A Do Nothing alternative would mean leaving all the existing buildings and grounds in place, just as they are. Instead, the DEIR incorrectly labeled the “Do Nothing” alternative as an alternative that included demolishing the existing buildings. “Do Nothing” actually has continued to meet the objectives of the BCHD, and may continue to meet the objectives.

The DEIR must analyze the “Do Nothing” alternative.

5.4 ALTERNATIVES CONSIDERED BUT REJECTED FROM FURTHER ANALYSIS

MC-16 The DEIR rejected for further review the alternative “Upgrade the Beach Cities Health Center (No Seismic Retrofit)”. This is a major fault of this DEIR. This could be considered the most environmentally favorable alternative and could be selected as the best course of action. The DEIR states it does not meet the project objectives, but it can continue to meet the objectives of the BCHD.

A complete analysis should be done for 2 alternatives: 1) remodel and 2) remodel to include retrofit. Either of these would be environmentally friendly alternatives. And, the “Do Nothing” alternative analysis needs to be conducted.