

**From:** Mark Nelson

**Sent:** Monday, November 23, 2020 1:32 PM

**To:** Communications <[communications@bchd.org](mailto:communications@bchd.org)>; EIR <[eir@bchd.org](mailto:eir@bchd.org)>

**Cc:** [jane.diehl@bchd.org](mailto:jane.diehl@bchd.org); [vanessa.poster@bchd.org](mailto:vanessa.poster@bchd.org); [noel.chun@bchd.org](mailto:noel.chun@bchd.org); [michelle.bholat@bchd.org](mailto:michelle.bholat@bchd.org); CityClerk <[CityClerk@redondo.org](mailto:CityClerk@redondo.org)>; [CityClerk@torranceca.gov](mailto:CityClerk@torranceca.gov)

**Subject:** Comment to the BCHD Board - BCHD has no demonstrated need or viability for a PACE facility to serve Manhattan, Hermosa and Redondo Beach Taxpayer Owners

TO: BCHD Board

CC: Redondo Beach and Torrance Mayors, Councils, and Planning Commissioners as a Public Comment

On June 12, 2020, BCHD provided a never before seen plan for the Healthy Living Campus that included a 400 person PACE facility. After only 3 business days of public review, analysis and comment, the BCHD Board approved the plan.

Subsequently, I filed a CPRA requesting all studies by BCHD of the need for PACE service in the specific BCHD owner cities footprint of Manhattan, Hermosa, and Redondo Beach. BCHD has failed to respond.

BCHD has a \$7.6M pre-development budget for HLC activity that is ample for BCHD to process California Public Records Act requests in a timely fashion. Yet, BCHD failed. Furthermore, BCHD has a \$10,000 per month communications consultant that could also allow BCHD to comply with the CPRA. Yet, BCHD failed.

Cain Bros., the \$300,000 contracted investment bankers for BCHD, without data, suggested that BCHD PACE could be patient funded, instead of Medicare+Medicaid, since many/most local residents are not Medicaid eligible. However, according to the National PACE Association, only 1% of PACE users are self-funded. 90% of users are Medicare+Medicaid, while 9% are Medicaid only. That suggests that only a total of 4 Beach Cities participants out of the 400 proposed users will meet the suggested Cain Bros. criteria of being a "cash" patient.

BCHD and its Cain Bros. consultants appear to have deliberately truncated the review and comment time of the public to summarily approve its ill-researched, and apparently non-financially viable PACE scheme.

Mark Nelson

Redondo Beach Property Owner

3+ Year BCHD HLC CWG Volunteer

**From:** Mark Nelson

**Sent:** Monday, November 23, 2020 6:41 PM

**To:** Communications <[communications@bchd.org](mailto:communications@bchd.org)>

**Cc:** [noel.chun@bchd.org](mailto:noel.chun@bchd.org); [michelle.bholat@bchd.org](mailto:michelle.bholat@bchd.org); [vanessa.poster@bchd.org](mailto:vanessa.poster@bchd.org); [jane.diehl@bchd.org](mailto:jane.diehl@bchd.org); CityClerk <[CityClerk@redondo.org](mailto:CityClerk@redondo.org)>; [CityClerk@torranceca.gov](mailto:CityClerk@torranceca.gov); David Rosenfeld <[drosenfeld@scng.com](mailto:drosenfeld@scng.com)>; Lisa Jacobs <[lisa.jacobs@tbrnews.com](mailto:lisa.jacobs@tbrnews.com)>; Judy Rae <[easyreader@easyreadernews.com](mailto:easyreader@easyreadernews.com)>

**Subject:** Re: Save the Date: Community Working Group Virtual Meeting Dec. 7

To the CWG with copies to the Media, and Redondo Beach and Torrance Mayors, Councils and Planning Commissioners as public comment:

I've provided a series of California Public Records Act requests to BCHD that will undoubtedly result in untimely replies from BCHD regarding communications with Youssef and payments for this "prudent" finding. This is a meaningless letter.

BCHD framed the question as: "BCHD finds that continued use with seismic retrofit is NOT cost-effective, therefore, we plan to tear down the building. If you accept our findings of 1) seismic retrofit is required, and 2) it is not cost-effective, then is it appropriate to tear down 514?" It is outside the scope of Youssef's role as a consulting engineer to choose between abandonment in place, demolition, or continued use without retrofit. Youssef's prior reports acknowledged that continued use of 514 was acceptable, and Youssef made no engineering safety finding that required 514 to be retrofitted, demolished, or abandoned. Youssef conditioned its reply on the fact that there are no ordinances supporting BCHDs perceived requirement to demolish 514. Therefore, this conditioned letter has no bearing on the future use of 514 for HLC.

**The appropriate question is, "if it is cost-effective to continue operation of 514 without seismic retrofit, does Youssef find that act to be IMPRUDENT, absent any ordinances requiring retrofit from a narrow engineering safety perspective."**

I assert that Youssef's prior reports already condone continued use of 514 absent retrofits. If posed the question above, Youssef's only consistent response with its reports must be to reinforce that continued use of the building is not unsafe. BCHD is doing a large, purely elective project that will have widespread environmental and economic damages to the surrounding communities, based on their misconception that seismic retrofit is REQUIRED. Per Youssef's letter and prior report, retrofit is NOT required and is a discretionary act that results in environmental carnage.

On Mon, Nov 23, 2020 at 5:55 PM Beach Cities Health District <[communications@bchd.org](mailto:communications@bchd.org)> wrote:

Dear Mark,

With the upcoming release - in early 2021 - of the Draft Environmental Impact Report (EIR) for the Healthy Living Campus project, please save the date for **our next CWG meeting Monday, December 7 at 6 p.m.** An agenda and Zoom link will be sent prior to the meeting.

We recently received a letter ([click here to view](#)) from Nabih Youssef Associates, our seismic consultant and thought you would be interested. We will discuss this letter at the meeting on December 7. I hope you will be able to join us!

Thank you again for volunteering your time and energy to serve as our community sounding board.

Best wishes for a Happy Thanksgiving to you and your family.

Sincerely,

**Dan Smith**

*Communications Manager*

Beach Cities Health District

Ph: 310-374-3426, x156

*Creating a healthy beach community.*

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**From:** Mark Nelson

**Sent:** Friday, November 27, 2020 10:17 AM

**To:** Communications <[communications@bchd.org](mailto:communications@bchd.org)>; [vish.chatterji@bchd.org](mailto:vish.chatterji@bchd.org); [jane.diehl@bchd.org](mailto:jane.diehl@bchd.org); [vanessa.poster@bchd.org](mailto:vanessa.poster@bchd.org); [michelle.bholat@bchd.org](mailto:michelle.bholat@bchd.org); [noel.chun@bchd.org](mailto:noel.chun@bchd.org); Martha Koo <[drkoo@neurowellnessspa.com](mailto:drkoo@neurowellnessspa.com)>; CityClerk <[CityClerk@redondo.org](mailto:CityClerk@redondo.org)>; [CityClerk@torranceca.gov](mailto:CityClerk@torranceca.gov); Brandy Forbes <[Brandy.Forbes@redondo.org](mailto:Brandy.Forbes@redondo.org)>

**Cc:** Lisa Jacobs <[lisa.jacobs@tbrnews.com](mailto:lisa.jacobs@tbrnews.com)>; Judy Rae <[easyreader@easyreadernews.com](mailto:easyreader@easyreadernews.com)>; David Rosenfeld <[drosenfeld@scng.com](mailto:drosenfeld@scng.com)>; [rosanna.xia@latimes.com](mailto:rosanna.xia@latimes.com)

**Subject:** Wood PLCs Lack of Environmental Credibility to Protect California and the Neighborhoods Surrounding Beach Cities Health District

TO: BCHD Board; Mayor, Council, Planning Commissions of Redondo Beach and Torrance; Media (cc); NGOs (bcc)

Through a loophole in State law that needs to be corrected, BCHD is allowed to both conduct and approve its own Environmental Impact Report (EIR) regarding its South Bay Galleria-sized, 793,000 sqft development complete with an 8-story parking garage. In an apparent effort to assure that BCHD was able to approve their over-sized development, they chose Wood PLC, a UK-based energy-engineering company to conduct the analysis that will “protect” the neighbors from environmental and economic injustice impacts and write the EIR. BCHD has never conducted an environmental analysis, and the City of Redondo Beach, an experienced agency, conducted the analyses for the prior two projects on the BCHD campus, the 510 and 520 Medical Office Buildings.

The California Legislature established policies in Public Resources Code (PRC) Sections 21000, 21001, 21002, and 21002.1 (collectively the California Environmental Quality Act or CEQA) concerning the maintenance of a quality environment for the people of the state as well as the enhancement of the environment and control of environmental pollution. This is broadly the task of the EIR process and CEQA.

To support their CEQA obligations, BCHD chose a firm with over 75% oil and chemical revenues to conduct the analysis. Here are some of Wood PLCs “environmental accomplishments”:

Wood specializes in offshore oil exploration, drilling and pumping (think – Deepwater Horizon debacle). Wood even has a catalog of their offshore oil rig designs.

[https://www.woodplc.com/\\_data/assets/pdf\\_file/0027/117099/Topsides-Design-Catalog.pdf](https://www.woodplc.com/_data/assets/pdf_file/0027/117099/Topsides-Design-Catalog.pdf)

Wood is “Proud” to be working in the Tar Sands – the dirtiest oil area on

Earth. <https://www.woodplc.com/news/2019/wood-opens-new-office-in-edmonton,-alberta>  
<https://www.nrdc.org/resources/stop-tar-sands-oil-expansion-and-infrastructure>

Wood was one of the firms developing the environmentally destructive and socially irresponsible Dakota Access Pipeline hauling fracking and tar sands oil.

[https://www.woodplc.com/investors?a=8183&fbclid=IwAR1P84W90wivgznga\\_Vra0SBHLjwfZWudyNCTZXDLA0HUdpU2VXeVOoWHig](https://www.woodplc.com/investors?a=8183&fbclid=IwAR1P84W90wivgznga_Vra0SBHLjwfZWudyNCTZXDLA0HUdpU2VXeVOoWHig)

[https://www.nrdc.org/experts/dan-west/huge-win-standing-rock-and-national-environmental-policy-act?fbclid=IwAR3yvj6Q9IUlw4jxwZiWFTa6rE5KbAWfqjBN\\_BMXNBoP\\_0795Tv1MCWvC4c](https://www.nrdc.org/experts/dan-west/huge-win-standing-rock-and-national-environmental-policy-act?fbclid=IwAR3yvj6Q9IUlw4jxwZiWFTa6rE5KbAWfqjBN_BMXNBoP_0795Tv1MCWvC4c)

Wood is an active partner in the first new oil refinery in decades – the Davis Refinery, being built next to



the Theodore Roosevelt National Park to process fracked oil.

<https://meridianenergygroupinc.com/wood-selected-by-meridian-energy-group-inc-to-partner-for-the-davis-refinery/>

Wood made the 2020 list of “Wreckers of the Earth” - quite an accomplishment for BCHDs “environmental” firm. <https://corporatewatch.org/wreckers-of-the-earth-london-company-directory/>

Wood earns the vast majority of its Americas revenues from oil and chemical exploration (45%), and extraction and processing support (30%).

[https://www.woodplc.com/\\_data/assets/pdf\\_file/0027/124974/Wood\\_Annual\\_Report\\_and\\_Accounts\\_2019\\_SCREEN.pdf](https://www.woodplc.com/_data/assets/pdf_file/0027/124974/Wood_Annual_Report_and_Accounts_2019_SCREEN.pdf)

[https://www.woodplc.com/\\_data/assets/pdf\\_file/0016/50920/Wood-brochure-Rio-Oil-and-Gas-2018.pdf](https://www.woodplc.com/_data/assets/pdf_file/0016/50920/Wood-brochure-Rio-Oil-and-Gas-2018.pdf)

BCHDs choice of a firm that draws the majority of its revenues, and therefore its executive management, Board, and investor support from toxic and environmentally damaging oil exploration, drilling and refining activities to “PROTECT” the surrounding neighborhoods is reason enough to REJECT BCHDs Oversized Development Scheme.

Mark Nelson

3+ Year Volunteer, BCHD Community Working Group

Redondo Beach Property Owner

Expert Witness

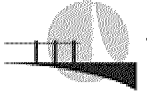
Current or former member of: NRDC, EDF, Sierra Club, TURN

## Khatirah Nazif

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**From:** Mark Nelson (Home Gmail) [REDACTED]  
**Sent:** Sunday, December 6, 2020 6:15 PM  
**To:** Communications  
**Cc:** CityClerk; CityClerk@torranceca.gov; Steven Keller; Tim Stowe; Brandy Forbes  
**Subject:** Re: Community Working Group Comments 12-7-2020 (3rd Edition, 12/6/2020)

**Categories:** Khatirah



ATTN: Email is from an external source; **Stop, Look, and Think** before opening attachments or links.

According to a zoning map kindly provided by Director Forbes of Redondo Beach, there are only 7 P-CF zoned parcels in Redondo Beach. NONE of them tower 8-15 stories above the surrounding neighborhoods. BCHD must conform with local height limits, which appear to be roughly 30 feet for the vast majority of bordering zoning of BCHD, especially since the only use ever approved by voters was for an emergency hospital sized exclusively for the use of the 3 beach cities that own, fund and funded South Bay Hospital and the subsequent BCHD that renamed SBHD after South Bay Hospital failed.

The P-CF parcels are:

Kensington  
Broadway Fire Station  
BCHD  
Police shooting range  
Andrews Park  
Grant Fire Station  
North Library

On Sun, Dec 6, 2020 at 3:07 PM Mark Nelson (Home Gmail) [REDACTED] wrote:

BCHD is proposing to build on the far edges of campus, adjacent to neighborhoods, with heights of 8-15 stories above surrounding residences



Mark Nelson (Home Gmail) [REDACTED]

to Communications, cityclerk, CityClerk, Brandy, EIR



ADDRESS	BASE ELEVATION (feet)	BCHD PROPOSED HEIGHT OVER HOMES (feet)	BCHD PROPOSED HEIGHT OVER HOMES (stories)
514 N Prospect Ave, Redondo Beach, California, 90277	169		
19714 Mildred Ave, Torrance, California, 90503	96	148	15
5607 Towers St, Torrance, California, 90503	97	147	15
19502 Tomlee Ave, Torrance, California, 90503	118	126	13
1200 Diamond St, Redondo Beach, California, 90277	119	125	13
1210 Diamond St, Redondo Beach, California, 90277	120	124	12
19338 Tomlee Ave, Torrance, California, 90503	126	118	12
1410 Diamond St, Redondo Beach, California, 90277	134	110	11
1400 Diamond St, Redondo Beach, California, 90277	136	108	11
1112 Beryl St, Redondo Beach, California, 90277	139	105	11
1219 Beryl St, Redondo Beach, California, 90277	142	102	10
1321 Beryl St, Redondo Beach, California, 90277	143	101	10
501 N Prospect Ave, Redondo Beach, California, 90277	153	91	9
601 N Prospect Ave, Redondo Beach, California, 90277	162	82	8

#### Elevations from USGS

On Sat, Dec 5, 2020 at 2:54 PM Mark Nelson (Home Gmail [REDACTED]) wrote:  
Public Comments to BCHD, CWG, City of Torrance, City of Redondo Beach, TUSD, RBUSD and Media

Due to a medical conflict, I am unable to attend the December 7, 2020 BCHD Community Working Group meeting.

These comments for the December 7, 2020 CWG meeting are with respect to the BCHD never before seen design that was released at 605PM on June 12, 2020 and board-approved on June 17, 2020 after only 3 business days of public review, analysis and input despite the project having an 11-year history and no public meetings, Zoom or otherwise, for months and months. The plan moved 160,000 sq ft of parking to the upper 4 stories of an 8-story parking structure at Prospect and Diamond, placed a 75-foot tall, 6-story, "upscale" \$12,000 monthly senior apartment building on the north lot line from the 520 building to Flagler, added a never before seen aquatic center, and lined Prospect from Diamond to the north entrance with buildings. This never before seen design with significantly different features and environmental damages than that disclosed in the NOP was only allowed 3 business days for the public before approval by the Board.

1. BCHD is proposing to do significant environmental damage to the surrounding neighborhoods by its voluntary early retirement, demolition, and rebuilding of the 514 building.

2. The City of Redondo, County of Los Angeles, and the State of California have no ordinances that require demolition or seismic retrofit of the 514 for non-hospital use. The environmental damage, landfilling of debris, and rebuilding of the 514 building is an exclusively discretionary, non-required act by BCHD.
3. Youssef Associates clearly states that retrofit or demolition is a voluntary act by BCHD. Further, Youssef also states that under the best practices ordinance of the City of LA (not applicable) the 514 would have approximately 20 years of existing life prior to retrofit or demolition. Absent BCHD internal decision that retrofit is required, Youssef would have no opinion.
4. BCHD and BCHD alone determined that 514 must be retrofitted or demolished. There is no Youssef determination in any Youssef reports.
5. BCHD has no professional opinion that 514 is unsafe for continued use and must be effectively "red tagged."
6. BCHD has conducted no Economic Justice analysis of its damages on the surrounding neighborhoods.
7. BCHD has conducted no Environmental Justice analysis of its damages on the surrounding neighborhoods.
8. BCHD has less than 1000 sqft of the campus at the building height of 75 feet (the penthouse), that highest point is nearly dead-center in the campus lot, and BCHD is using that 0.3% of the campus sqft to establish the proposed height to be built on the perimeter.
9. 75-foot tall perimeter construction is the equivalent of 300-foot tall construction at the campus center.
10. BCHD is weaponizing economic and environmental injustice by proposing the 75 foot, 6-story, "up-scale" senior apartments on the far north side of the campus against residential neighborhoods made up of young, economically disadvantaged renters with a larger minority fraction than the other "beach cities" that own and fund BCHD. These renters do not have the economic means to effectively oppose BCHD and that's likely why they were selected as powerless opponents to BCHD.
11. BCHD is proposing environmentally damaging noise, light, and particulate pollution of the surrounding neighborhoods at Prospect and Diamond with its 8-story, 800+ car parking structure.
12. When counting relevant, above ground development, BCHD June 17, 2020 Board approved design is more sqft than prior designs as BCHD moved 160,000 sqft of parking structure from underground to above ground atop the 8-story structure.

13. BCHD, RBUSD and TUSD are all aware that PM 2.5 pollution from construction and traffic lodges in the brainstems of children, causing Alzheimer's like conditions and delayed development, yet BCHD continues to propose to add to the PM 2.5 burden of Towers and Beryl Heights schools.

<https://pubmed.ncbi.nlm.nih.gov/27567860/>

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6138768/>

14. 95% of the housing BCHD has proposed serves persons outside of Redondo Beach 90277 according to MDS's study.

15. 80% of the housing BCHD has proposed serves non-residents of the 3 beach cities.

16. 100% of the Economic and Environmental Injustice burden of the proposed project to the 3 beach cities occurs in Redondo Beach 90277.

17. The South Bay Hospital was approved and funded by voters. After its failure in 1984 as a public hospital and subsequent failure in the mid-1990s as a leased facility (cite: Daily Breeze) it retained all voter approved assets and changed its name to BCHD.

18. South Bay Hospital provided a quid pro quo for its economic and environmental damages to the surrounding neighborhoods of an emergency hospital, as approved by voters. BCHD has no such approval nor emergency benefits to the surrounding neighborhoods. BCHDs location is not required to be at the Prospect campus.

19. There is a 1200 signature petition opposing BCHD development.

20. BCHD Board Member Vanessa I. Poster, caregiver to her 93 year old father, was unable to keep Covid out of her personal household. There will be over 700 tenants and PACE patients in the proposed BCHD facility and the demonstrated ineptitude of one Board member sends a clear signal of the ineptitude of the organization.

21. BCHD's so-called environmental firm, Wood PLC, earns the vast majority of its income supporting oil and chemicals business, including but not limited to the tar sands, fracking, and refining. Wood PLC is an immoral and unfit choice for environmental protection and CEQA execution.

#### TAR SANDS

<https://www.woodplc.com/news/2019/wood-opens-new-office-in-edmonton,-alberta>

#### FRACKING

<https://meridianenergygroupinc.com/wood-selected-by-meridian-energy-group-inc-to-partner-for-the-davis-refinery/>

#### REFINING

<https://minnesota.cbslocal.com/2020/01/10/planned-n-d-refinery-by-theodore-roosevelt-national-park-hurt-by-funding-lawsuits/>

Mark Nelson

3+ Year Volunteer to BCHD CWG

Redondo Beach Property Owner

Expert Witness

Member Sierra Club, NRDC, EDF, Nature Conservancy

**From:** Mark Nelson

**Sent:** Monday, December 7, 2020 9:48 AM

**To:** CityClerk <[CityClerk@redondo.org](mailto:CityClerk@redondo.org)>; [CityClerk@torranceca.gov](mailto:CityClerk@torranceca.gov); Brandy Forbes <[Brandy.Forbes@redondo.org](mailto:Brandy.Forbes@redondo.org)>

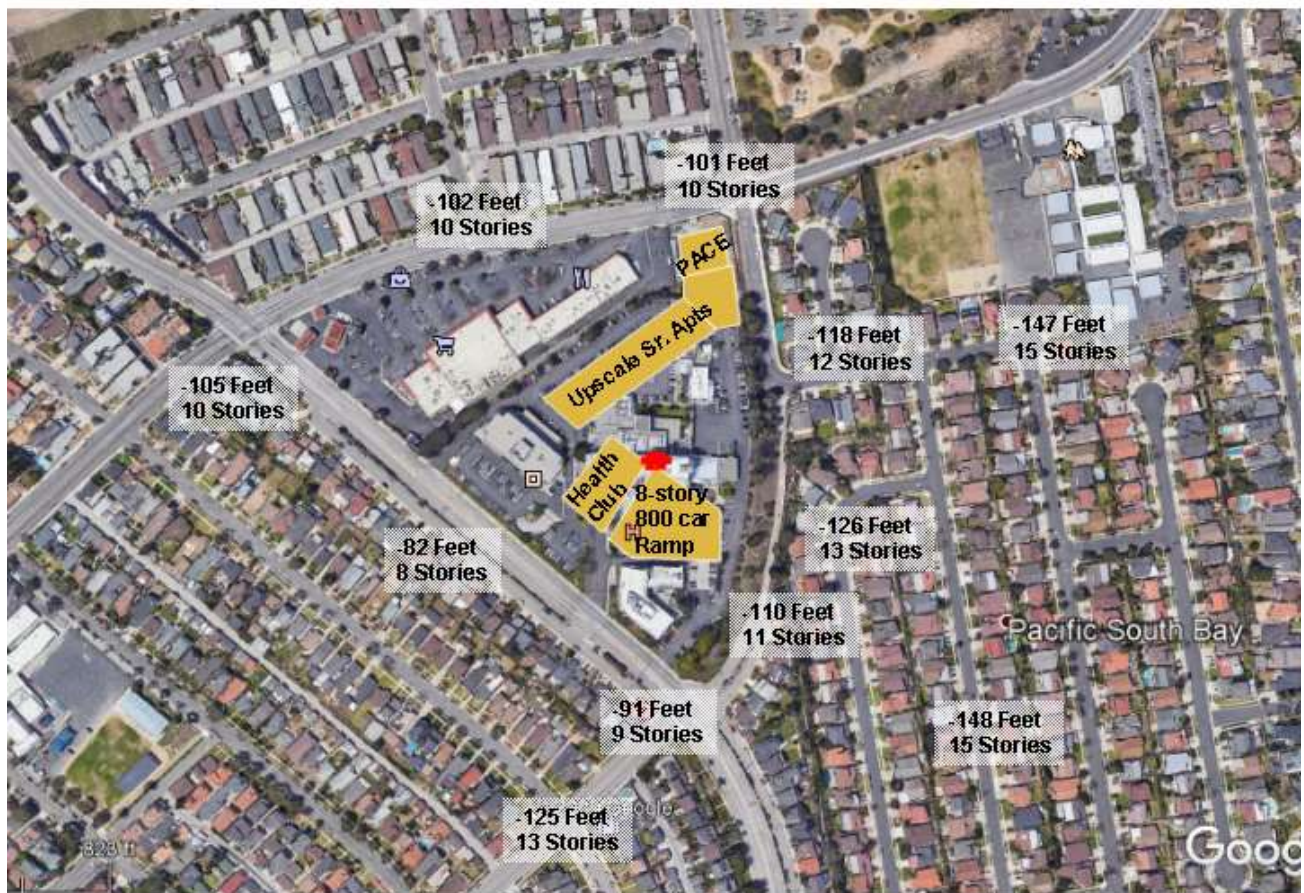
**Cc:** Communications <[communications@bchd.org](mailto:communications@bchd.org)>; Judy Rae <[easyreader@easyreadernews.com](mailto:easyreader@easyreadernews.com)>; Lisa Jacobs <[lisa.jacobs@tbrnews.com](mailto:lisa.jacobs@tbrnews.com)>

**Subject:** Public Comment - Map of BCHD Neighborhood Impacts

Redondo Beach and Torrance Mayor, City Council and Planning Commissions:

I have used USGS to map the impacts of the 6-story, \$12,500 per month apartments and 8-story, 800-car parking ramp on the surrounding neighborhoods. As you can see, the perimeter locations of BCHD over-development greatly increase the invasion into the local neighborhoods from the previous 514 Building. BCHD is planning to have 100,000s of square feet of perimeter 75-foot tall development on the site that previously had one single 900 sqft mechanical penthouse at 75-feet.

Given the elevation of the BCHD site, BCHDs over-development will create an 8-15 story elevation over the top of surrounding neighborhoods.



## Khatirah Nazif

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**From:** Mark Nelson (Home Gmail) [REDACTED]  
**Sent:** Monday, December 7, 2020 6:28 PM  
**To:** CityClerk; CityClerk@torranceca.gov; Brandy Forbes  
**Subject:** Public Comments to Torrance and Redondo Beach Mayor, Council and Planning Commissions  
**Attachments:** Redondo North Branch Library P-CF.PNG; Broadway Fire Station P-CF.PNG; Beryl Yard P-CF.PNG; Andrews Park P-CF.PNG; Grant Fire Station P-CF.PNG; Kensington P-CF.PNG  
**Categories:** Khatirah



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BCHD is the only incompatible zoning use in Redondo Beach in a P-CF zone. Structurally it is 3 times the height of surrounding neighborhoods, and due to the elevation of the site, it is 80 to 150 feet higher than visible homes, thereby devastating privacy and generating visual blight and noise. Historically, BCHD assumed the assets of the failed South Bay Hospital. Since South Bay Hospital was an emergency hospital, its location was relevant and a direct life-saving service as a quid pro quo to the surrounding community for the Environmental and Economic Injustice impacts. BCHD provides no such benefits and will only provide 5% of its planned services to south Redondo Beach 90277 while that same area suffers 100% of the damages.

There are only 7 parcels zoned P-CF in the City. Of the 7, only BCHD is incompatible with the surrounding neighborhoods visually and operationally and provides no quid pro quo.

BCHD will have 80% out of district tenants and up to 91% out of district daily PACE patients, thereby rendering its location largely irrelevant. Furthermore, its disparate services could be broken apart into various locations or privatized.

The following 6 locations are the other P-CF parcels. Note that NONE of them invades their areas the way the BCHD is planning with a 75 foot structure on a 35 foot elevated site, moved from the center of the campus to the extreme perimeters.

BCHD is an incompatible future use for the parcel.

Mark Nelson  
3+ Year Volunteer BCHD CWG  
Redondo Beach Property Owner  
Expert Witness  
Retired VP and Planning Director









19160 N Beryl St  
Torrance, California

Google

Street View



1828 Rockefeller Ln  
Redondo Beach, California

Google

Street View



Aid

Andrews  
Small open  
for picnics &

Aviation Blvd  
Grant Ave





2405 Grant Ave  
Redondo Beach, California

Google

Street View

Carnegie Ln  
Rockefeller Ln  
Grant Ave  
Huntington Ln  
Harrihan Ln  
Adams mi

Google

Image capture: Jan 2018 © 2020 Google United States Terms Report a problem



## Khatirah Nazif

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**From:** Mark Nelson (Home Gmail) [REDACTED]  
**Sent:** Monday, December 7, 2020 9:48 AM  
**To:** CityClerk; CityClerk@torranceca.gov; Brandy Forbes  
**Cc:** Communications; Judy Rae; Lisa Jacobs  
**Subject:** Public Comment - Map of BCHD Neighborhood Impacts  
**Attachments:** BCHD Stories.png

**Categories:** Khatirah



ATTN: Email is from an external source; **Stop, Look, and Think** before opening attachments or links.

Redondo Beach and Torrance Mayor, City Council and Planning Commissions:

I have used USGS to map the impacts of the 6-story, \$12,500 per month apartments and 8-story, 800-car parking ramp on the surrounding neighborhoods. As you can see, the perimeter locations of BCHD over-development greatly increase the invasion into the local neighborhoods from the previous 514 Building. BCHD is planning to have 100,000s of square feet of perimeter 75-foot tall development on the site that previously had one single 900 sqft mechanical penthouse at 75-feet.

Given the elevation of the BCHD site, BCHDs over-development will create an 8-15 story elevation over the top of surrounding neighborhoods.

December 11, 2020

Redondo Beach Planning Commission

by email to Brandy.Forbes@redondo.org

Dear Commissioners:

Beach Cities Health District's proposed development fails to interface with the surrounding neighborhoods that are generally zoned R-1 and RMD, both of which are 30-foot zoning limits. In fact, one could strongly argue that BCHD has elected to maximize, not minimize, its neighborhood impacts.

This is now important because the City of Redondo Beach had previously executed the environmental documents on behalf of BCHD/SBHD for the 510 and 520 buildings and BCHD has now elected to be the lead agency. As such, it self-certifies and overrides any environmental impacts. The only meaningful checks and balances on BCHD will be the City of Redondo Beach and the courts, and since BCHD has in a practical sense limitless taxpayer resources for litigation, the City of Redondo Beach needs to protect surrounding residents if the risk to taxpayer funds is to be limited.

Unlike South Bay emergency Hospital with 24/7 ER services, BCHD serves no emergency purpose and has no need to be located in any specific place within Redondo Beach or the three beach cities. In fact, BCHD's consultant, MDS, projects that 80% of RCFE tenants will be from outside the 3 beach cities, so it's unclear that the assisted living facility, a generally for-profit activity, should even be located in the 3 beach cities. Why should 100% of the environmental and economic injustice damages be borne in the beach cities for only 20% of the benefits? Further, Redondo Beach bears 100% of the damages for under 10% of the benefits. And the worst environmental and economic injustice is that south Redondo Beach 90277 receives under 5% of the benefit and 100% of the damages.

BCHD has no forecast of the home zip codes of the PACE facility users. According to the national trade organization, 90% of PACE users have both Medicare and Medicaid eligibility, while 9% have Medicaid only, and less than 1% are cash customers. It's difficult to imagine that a preponderance of the users will be from the 3 beach cities given the need for both Medicare and Medicaid eligibility.

The current proposed BCHD project, which increased height, moved 80% of site parking into an 8-story structure at Prospect and Diamond, and develops a 4-story health club pavilion against the western residential neighbors was developed in a vacuum by BCHD, with no input on those features from its community working group of nearly four years. We, the CWG members, were just as blindsided as the general public and also limited to 3 business days of comment on the \$400M plan.

I provide three examples below of how the current design fails to meet any reasonable standard of interface with the surrounding neighborhoods:

Example 1: Project Maximum Height

**CURRENT:** As a precursor, the existing height of the former South Bay Hospital building is irrelevant, since the plan is to tear it down. No past approval, especially in the case of a small mechanical room, ensures future project approval.

BCHD currently has a single, 900 sqft mechanical room (the "Penthouse") at a height of 75-feet on the campus. All other heights are 1-story or more shorter. The Penthouse is atop the 514 building, nearly



centered in the campus. Elementary geometry can easily demonstrate that the emergency hospital was placed in a position on the 10 acre parcel to reduce its visual impact. It was not until the leasing of the land for the 510 building and subsequent construction that South Bay Hospital ceased attempting to interface with the neighborhood.

**PROPOSED:** BCHD proposes to put 253,700 sqft at the 75-foot height, or over 250-times as many square feet at the maximum height as the current facility. Furthermore, BCHD has placed that 250,000+ sqft on the far north perimeter with no attempt to minimize its community impacts. The RMD zoned neighborhood that BCHD plans to exploit is generally renters, younger, less affluent, and composed of more residents of color per US Census block level data. As such, besides maximizing their impact on the community in general with the apartment building height and location, BCHD is also creating a significant environmental and social injustice burden. It is disappointing to see our public agency weaponizing environmental justice.

#### Example 2: Parking

**CURRENT:** BCHD currently has an approximately 3 story parking structure at the corner of Prospect and Diamond. The structure is up against the homes on Diamond. That structure is approximately 200 vehicles and represents 25% of the total parking available on the site. The other 75% of the parking is generally accessible through the 514 entrance and the driveway north of the 520 building.

**PROPOSED:** BCHD proposes a replacement 8-story, 800 car structure at that same location. This structure will also be up against the homes on Diamond, however, it will be approximately 110-feet above the height of local homes on Diamond and anywhere from 80 to 150-feet above other surrounding homes. As a 24/7/365 parking structure for employees, it will be a constant source of noise, headlights, PM2.5, toxic brake dust, auto emissions, and other environmental hazards. Furthermore, the traffic entering and exiting BCHD will now be 80% adjacent to the northbound Prospect intersection with Diamond, a location that is frequently backed up from RUHS traffic as is.

#### Example 3: Health Club

**CURRENT:** The current Center for Health and Fitness is approximately 1 floor internal to the existing 514 building that is centered in the campus.

**PROPOSED:** The proposed health club and pavilion is a stair stepped 80,000 sqft structure (approximately the size of the 510 and 520 buildings combined), and it is STAIR STEPPED AWAY from the residential neighborhoods to the west. Instead of attempting to minimize the height and bulk of the building and interface with surrounding neighborhoods, BCHD appears to have used the stair step feature “backwards” to minimize the building’s impact on the internal campus, while maximizing its impact on surrounding neighborhoods.

As noted above, a case can be made that BCHD has ignored its obligation, especially as a public agency, to interface appropriately with surrounding neighborhoods. In fact, based on the three examples, BCHD has instead only concerned itself with its own benefits, and maximized its impact on the surrounding neighborhoods. BCHD has retained an investment banker supported the 6-story, ocean view, “upscale” senior apartments. It’s entirely possible BCHD’s investment banker has also encouraged BCHD to ignore environmental and economic justice as well.

The other P-CF zoned parcels in Redondo Beach have all been designed and developed far more thoughtfully and appropriately according to codes. Kensington is 2-story and architecturally consistent with upgrades going on in the surrounding residential neighborhoods. The Broadway and Grant fire

stations are both roughly the same height as the surrounding neighbors, perhaps lower. The north Library is also consistent with the surrounding RMD and light commercial zoning. The Beryl Street City yard across from Towers school is largely in an “industrial” area near the Edison 220Kv towers. And the last P-CF is Andrews Park. Clearly, none of these facilities has ignored or abused its neighborhood obligation to interface in a compatible manner with the local neighborhoods as BCHD plans to do.

Sincerely,

Mark Nelson  
Retired VP and Director of Planning SCE and subsidiaries  
Redondo Beach Property Owner  
3+ Year BCHD Planning Volunteer  
Expert Witness  
Member - Sierra Club, NRDC, EDF, Nature Conservancy

**From:** [Brandy Forbes](#)  
**To:** [Lina Portolese](#)  
**Subject:** FW: PUBLIC COMMENT Fwd: Thank You for Your Service: CWG Dec. 7 Meeting  
**Date:** Monday, December 14, 2020 8:45:21 AM  
**Attachments:** [image001.png](#)

---

Lina,

Please provide to the Planning Commission.

Thank you,

**Brandy Forbes**  
**Community Development Director**

Department of Community Development  
415 Diamond Street  
Redondo Beach, CA 90277  
(310) 318-0637 x2200  
[brandy.forbes@redondo.org](mailto:brandy.forbes@redondo.org)  
[www.redondo.org](http://www.redondo.org)



---

**From:** Mark Nelson (Home Gmail) [REDACTED]  
**Sent:** Saturday, December 12, 2020 11:41 AM  
**To:** Lisa Jacobs <lisa.jacobs@tbrnews.com>; Judy Rae <easyreader@easyreadernews.com>; CityClerk <CityClerk@redondo.org>; CityClerk@torranceca.gov; Brandy Forbes <Brandy.Forbes@redondo.org>  
**Subject:** PUBLIC COMMENT Fwd: Thank You for Your Service: CWG Dec. 7 Meeting



*ATTN: Email is from an external source; **Stop, Look, and Think** before opening attachments or links.*

Public Comment to Redondo Beach and Torrance Mayor, City Council and Planning Commissions:

----- Forwarded message -----

**From:** Mark Nelson [REDACTED]  
**Date:** Fri, Dec 11, 2020 at 11:08 PM  
**Subject:** Fwd: Thank You for Your Service: CWG Dec. 7 Meeting  
**To:** <[Al.Muratsuchi@asm.ca.gov](mailto:Al.Muratsuchi@asm.ca.gov)>

FYI - the current design by BCHD is theirs and theirs alone. We, the Community Working Group had the same 3 business days to review, analyze and comment as the general public on the never-before-seen design.

----- Forwarded message -----

From: **Mark Nelson** [REDACTED]  
Date: Fri, Dec 11, 2020 at 10:57 PM  
Subject: Re: Thank You for Your Service: CWG Dec. 7 Meeting  
To: Tom Bakaly <[tom.bakaly@bchd.org](mailto:tom.bakaly@bchd.org)>

BCC: CWG

I want to be very clear, the CWG did not agree to, nor play any role in BCHDs redesign of the 2019 plan that resulted in the June 12, 2020 never-before-seen plan. The CWG had no role in BCHD's creation of "expansive view" and "upscale" (Cain's language) 6-story, 75-foot tall apartments on the north lot line, nor with BCHDs creation of an 8-story, 800-car parking structure on the Prospect and Diamond corner, nor BCHDs creation of a 4-story, 65-foot health club pavilion lining Prospect from 510 to 520. Those were solely the act of BCHD and its consultants. The CWG, like the public, received that final, Board approved design at 605PM on June 12, 2020 and was afforded 3-business days to review, analyze and comment on it, the same as the general public.

On Thu, Dec 10, 2020 at 3:59 PM Tom Bakaly, Beach Cities Health District <[tom.bakaly@bchd.org](mailto:tom.bakaly@bchd.org)> wrote:



## **Thank You for Your Service on Our Healthy Living Campus Community Working Group**

Dear Mark,

Thank you for your participation during the past three years of planning and conceptual design refinement of the Healthy Living Campus project.

The Community Working Group process helped refine the Draft Master Plan that attempts to address community input, while aligning with the project objectives and pillars, protects the future of BCHD's health and wellness programs and services we provide to Beach Cities residents. Several trade-offs were made,

including:

- Reduced assisted living units from 420 to 220 and repositioning buildings away from neighbors living near the eastern border of the Campus.
- Expanded green space to 2.5 acres by creating a more compact building area, which could possibly increase building heights.
- Construction time reduced from three phases over nine years to two phases in five years.
- Total new developed building area (square footage) reduced 18% in the 2020 plan (665,820 sq. ft.) compared to the 2019 version (815,000 sq. ft.).

**The December 7 meeting was our 17th Community Working Group Meeting and will be our last for now.** There may be other opportunities in the future to participate - please stay tuned for more information on this.

Please keep in mind we are currently in the midst of the EIR process, so no final decisions regarding the proposed campus have been made.

For those unable to attend the final CWG meeting on December 7, our agenda included:

- Draft Environmental Impact Report (EIR) Timeline & Program Phase II
- General Updates & PACE
- Draft Master Plan FAQ
- Community Working Group Future Opportunities
- Questions/Comments

Please view the materials, presentation and video from the December 7 meeting here:

- [December 7 CWG Presentation](#)
- [December 7 CWG Summary Report](#) *(includes link to video of the meeting)*

Healthy Living Campus project materials are available at [bchdcampus.org/campus](http://bchdcampus.org/campus), and Board Meeting agendas, minutes and videos can be found at [bchd.org/board-directors-meetings](http://bchd.org/board-directors-meetings).

Please contact me at [tom.bakaly@bchd.org](mailto:tom.bakaly@bchd.org) at any time to share ideas, concerns and/or to request a presentation to a community group.

Thank you again for your collaboration over the last three years. We appreciate the time you took to contribute to the Healthy Living Campus.

In Health,

**Tom Bakaly***Chief Executive Officer*

Beach Cities Health District

Ph: 310 374-3426, x118

[www.bchd.org](http://www.bchd.org)[www.facebook.com/beachcitieshealth](https://www.facebook.com/beachcitieshealth)*Creating a healthy beach community.*

Beach Cities Health District | 514 N. Prospect Ave., 1st Floor, Redondo Beach, CA 90277

[Unsubscribe menelson@gmail.com](mailto:unsubscribe.menelson@gmail.com)[Update Profile](#) | [About our service provider](#)Sent by [tom.bakaly@bchd.org](mailto:tom.bakaly@bchd.org) powered by[Try email marketing for free today!](#)

**From:** Mark Nelson

**Sent:** Monday, December 14, 2020 5:33 PM

**To:** Communications <[communications@bchd.org](mailto:communications@bchd.org)>

**Cc:** CityClerk <[CityClerk@redondo.org](mailto:CityClerk@redondo.org)>; [CityClerk@torranceca.gov](mailto:CityClerk@torranceca.gov); Brandy Forbes <[Brandy.Forbes@redondo.org](mailto:Brandy.Forbes@redondo.org)>

**Subject:** Public Comments - Excessive Visual Height and Mass of the BCHD Proposed Development

Because the public and the Community Working Group were only afforded a scant 3 business days to review, analyze and comment on the never-before-seen BCHD HLC plan that was released at 605PM on Friday night June 12, and approved by the Board on June 17, 2020 without inclusion of an architectural visualizations, intelligent participation was denied to the public. In order to help inform the public of the excess height of the proposed BCHD HLC Board approved redesign, and in light of the recent dissolving of the CWG, I have used my personal time to approximate the design and heights and completed before and after visualizations from various neighborhoods. As an experienced developer, I fully expected BCHD and its fleet of consultants to provide this type of information prior to their Board approval to assist the public, however, that was not the case. BCHD is operating under a misconception that the CEQA comment process is the appropriate time and place to provide the public with information. Any experienced developer knows that is not the case, and that the project description that is used in the EIR process should be well vetted (not just 3 business days) prior to its commitment to CEQA. As an agency that has never served as a CEQA lead agency (BCHD deferred to the City of Redondo for the 510 and 520 medical office buildings), BCHD demonstrates little experience or understanding of the CEQA process.

This representation of the BCHD campus buildings is now known to be too short, that is, the BCHD proposed buildings are in fact taller than released on June 12, 2020 based on BCHDs CWG information release showing a series of mechanical penthouses on the roof. I expect the honest height of the project is approximately 88-feet above grade, or, 256-feet above sea level. That will place it between 150-feet and 200-feet above surrounding Torrance home levels.

The following visualizations are being entered into the record at BCHD and to a variety of other jurisdictions, agencies and organizations in order to demonstrate how BCHDs development fails to interface in any meaningful way with the surrounding residential neighborhoods. The design is simply too tall and in most cases exceeds 8-10 stories visually when interpreted at the 514 location due to the BCHD-selected lot-line perimeter locations of the 6-story \$12,000 monthly rent "upscale, expansive view" (Cain language) apartments; the 8-story 800 vehicle parking structure; and the 4-story 65-foot health club/pavilion that is stair-stepped away from the surrounding neighborhoods - exactly the opposite of a visual interface minimization strategy.

In short, BCHD appears not to have considered its significant impacts on the surrounding neighborhoods caused by its June 12, 605PM, Board approved campus design.

Perhaps most disappointing is BCHDs exploitation of the multifamily, modest-income, low average age, neighborhood of color directly to the north of the high-rise apartments between Beryl and Anita/190th. US Census block-level demographics easily demonstrate that of the surrounding areas, that one has the least economic and social power to battle a well-funded public agency that can self-certify its self-completed environmental report and declare any significant environmental impacts as insufficient to halt their project. BCHD must reduce the height of its development to a reasonable, neighborhood zoning consistent level. Environmental justice is a required attribute of CEQA and EIRs in California.



The attached link provides the visualizations and they are also attached as files.

Attachment: Dec 2020 Visualization of the Mass and Height of BCHDs Proposed Development

<https://bit.ly/BCHDHeight>

<https://www.facebook.com/bigbadbchd/posts/136497831570443>

[https://nextdoor.com/news\\_feed/?post=170740285](https://nextdoor.com/news_feed/?post=170740285)

CC: Public Record of Redondo Beach and Torrance Mayors and Councils, and Planning Commissions

# Visual Simulations of BCHD 793,000 SQFT Proposed Development

Simulated using Google Earth Pro  
December 2020

## BCHD Today 312,000 sqft



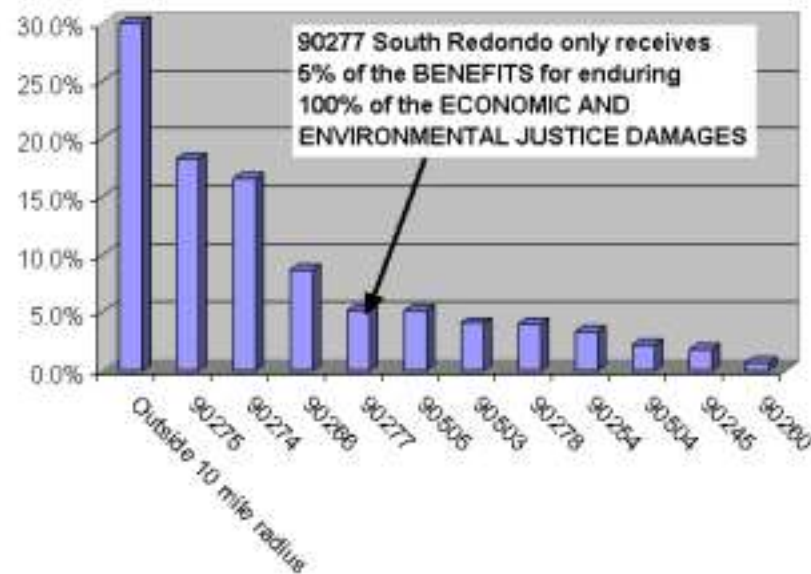
## BCHD Proposed 792,000 sqft



### SUMMARY

- BCHD proposes to allow a development built by a commercial 3<sup>rd</sup> party on publicly owned land at the failed South Bay Hospital campus.
- Land was bought and paid for with bond revenues approved by voters for an emergency hospital, not for commercial real estate development.
- The original emergency hospital study sized the facility for the 3 beach cities that formed and funded BCHD.
- The land that BCHD plans to lease will be encumbered for generations and unavailable for future use by taxpayer-owners of BCHD.
- 80% of expected tenants of the \$12,000 per month "upscale" "expansive view" apartments will be from outside the 3 beach cities.
- 95% of expected tenants of the \$12,000 per month "upscale" "expansive view" apartments will be from outside of 90277, the area that bear 100% of the environmental and economic injustice damages and had borne 100% of the EJ damages from the failed hospital and BCHD for 60 years.

### BCHD Consultant MDS Targeted Renters for Senior Housing Project are 80% Outside Manhattan, Hermosa, and Redondo Beach that OWN BCHD





**Current BCHD Campus View from Beryl & Prospect – RED is 75 foot tall  
“900sqft Penthouse” ILLUSTRATIVE MARKER POLES are 100 foot, 150  
foot and 200 foot**



**Proposed BCHD Campus View from Beryl & Prospect – BCHD  
PROPOSED BUILDINGS appear over 100 FEET TALL due to being BUILT  
ON EXTREME EDGE OF CAMPUS instead of being BUILT IN THE MIDDLE!**

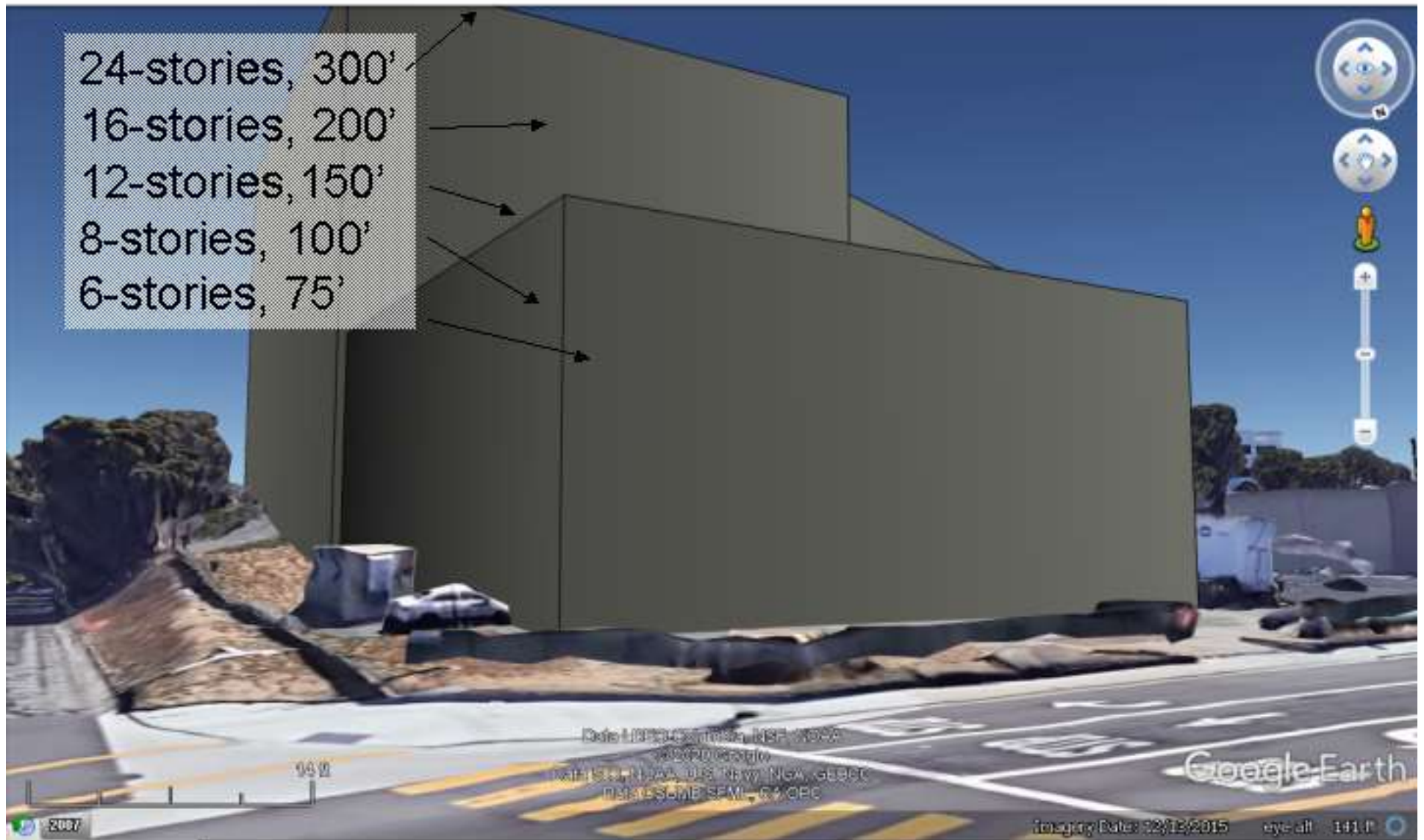




**Current BCHD Campus View from Beryl & Flagler – RED is 75 foot tall**  
**“900sqft Penthouse” ILLUSTRATIVE MARKER POLES are 100 foot, 150**  
**foot and 200 foot**



**Proposed BCHD Campus View from Beryl & Flagler – BCHD PROPOSED BUILDINGS appear over 300 FEET TALL due to being BUILT ON EXTREME EDGE OF CAMPUS instead of being BUILT IN THE MIDDLE!**





**Current BCHD Campus View from Beryl & Harkness – RED is 75 foot tall  
“900sqft Penthouse” ILLUSTRATIVE MARKER POLES are 100 foot, 150  
foot and 200 foot**





**Proposed BCHD Campus View from Beryl & Harkness – BCHD  
PROPOSED BUILDINGS appear over 130 FEET TALL due to being BUILT  
ON EXTREME EDGE OF CAMPUS instead of being BUILT IN THE MIDDLE!  
VISUALLY JUST LIKE REBUILDING THE HOSPITAL AS 10-STORIES TALL  
ALL THE WAY FROM PROSPECT TO FLAGLER!**



**Current BCHD Campus View from Prospect & Diamond – RED is 75 foot tall “900sqft Penthouse” ILLUSTRATIVE MARKER POLES are 100 foot, 150 foot and 200 foot**





**Proposed BCHD Campus View from Prospect & Diamond – BCHD  
PROPOSED BUILDINGS appear over 100 FEET TALL due to being BUILT  
ON EXTREME EDGE OF CAMPUS instead of being BUILT IN THE MIDDLE!  
VISUALLY JUST LIKE REBUILDING THE HOSPITAL AS 9-STORIES TALL**



**Current BCHD Campus View from 514 Prospect Entrance – RED is 75 foot tall “900sqft Penthouse” ILLUSTRATIVE MARKER POLES are 100 foot, 150 foot and 200 foot**





**Proposed BCHD Campus View from 514 Prospect Entrance – BCHD  
PROPOSED BUILDINGS are both TALLER than the existing hospital and  
CLOSER to the street, appearing over 125 FEET TALL!  
VISUALLY JUST LIKE REBUILDING THE HOSPITAL AS 10-STORIES TALL  
FROM THE 510 to the 520 Medical Office Buildings**



**Current BCHD Campus View from 514 Prospect Entrance – RED is 75 foot tall “900sqft Penthouse” ILLUSTRATIVE MARKER POLES are 100 foot, 150 foot and 200 foot**





**Proposed BCHD Campus View from 190<sup>th</sup> & Flagler – BCHD PROPOSED BUILDINGS TALLER than the existing hospital and CLOSER to the street, appearing over 100 FEET TALL!**

**VISUALLY JUST LIKE REBUILDING THE HOSPITAL AS 8-STORIES TALL FROM PROSPECT TO FLAGLER**

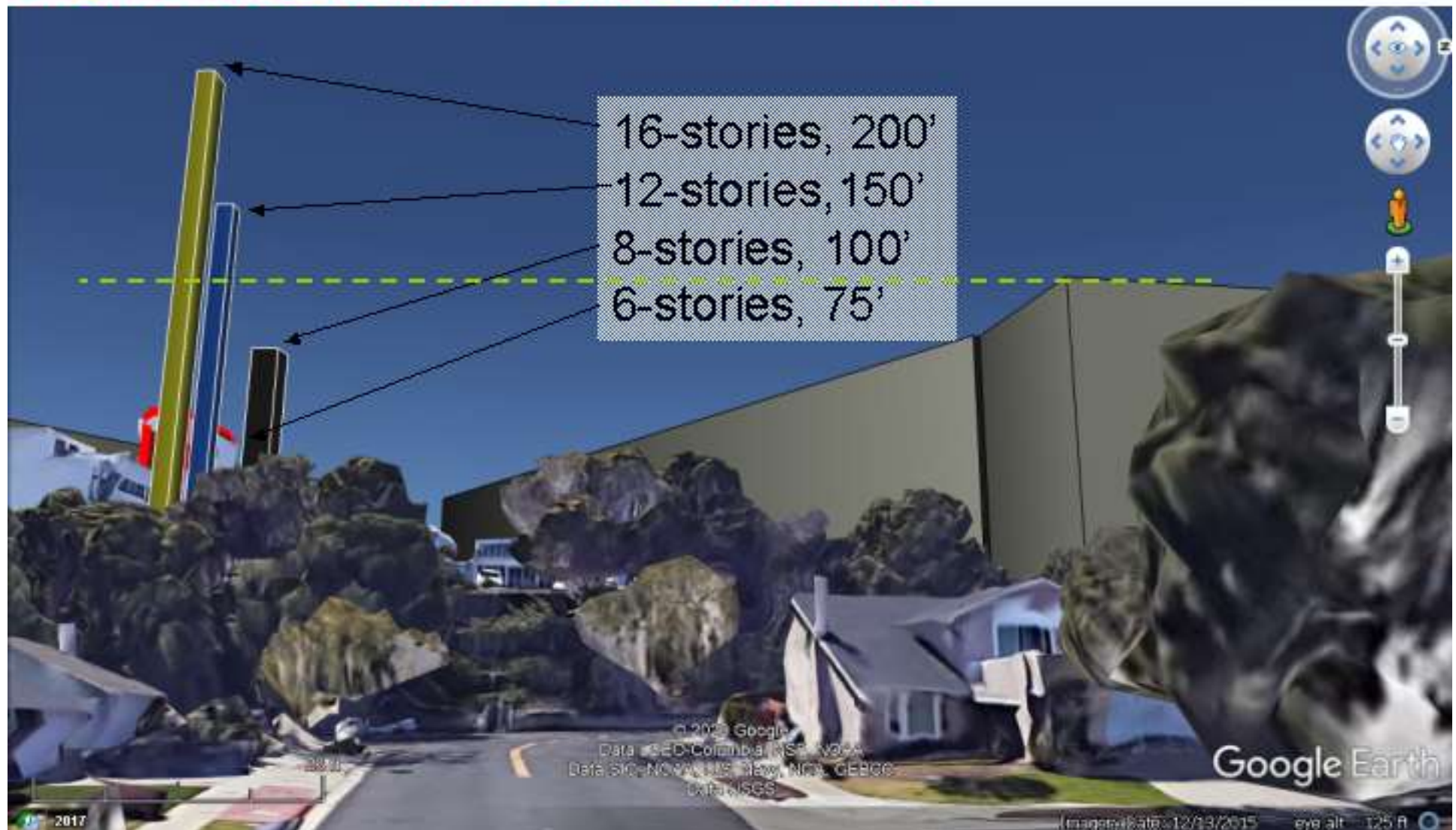


**Current BCHD Campus View from Towers & Tomlee – RED is 75 foot tall  
“900sqft Penthouse” ILLUSTRATIVE MARKER POLES are 100 foot, 150  
foot and 200 foot tall.**





**Proposed BCHD Campus View from Towers & Tomlee – BCHD  
PROPOSED BUILDINGS TALLER than the existing hospital and CLOSER  
to the street, appearing about 135 FEET TALL!  
VISUALLY JUST LIKE REBUILDING THE HOSPITAL AS 10-STORIES  
ALONG FLAGLER ABOVE TOMLEE RESIDENTS**



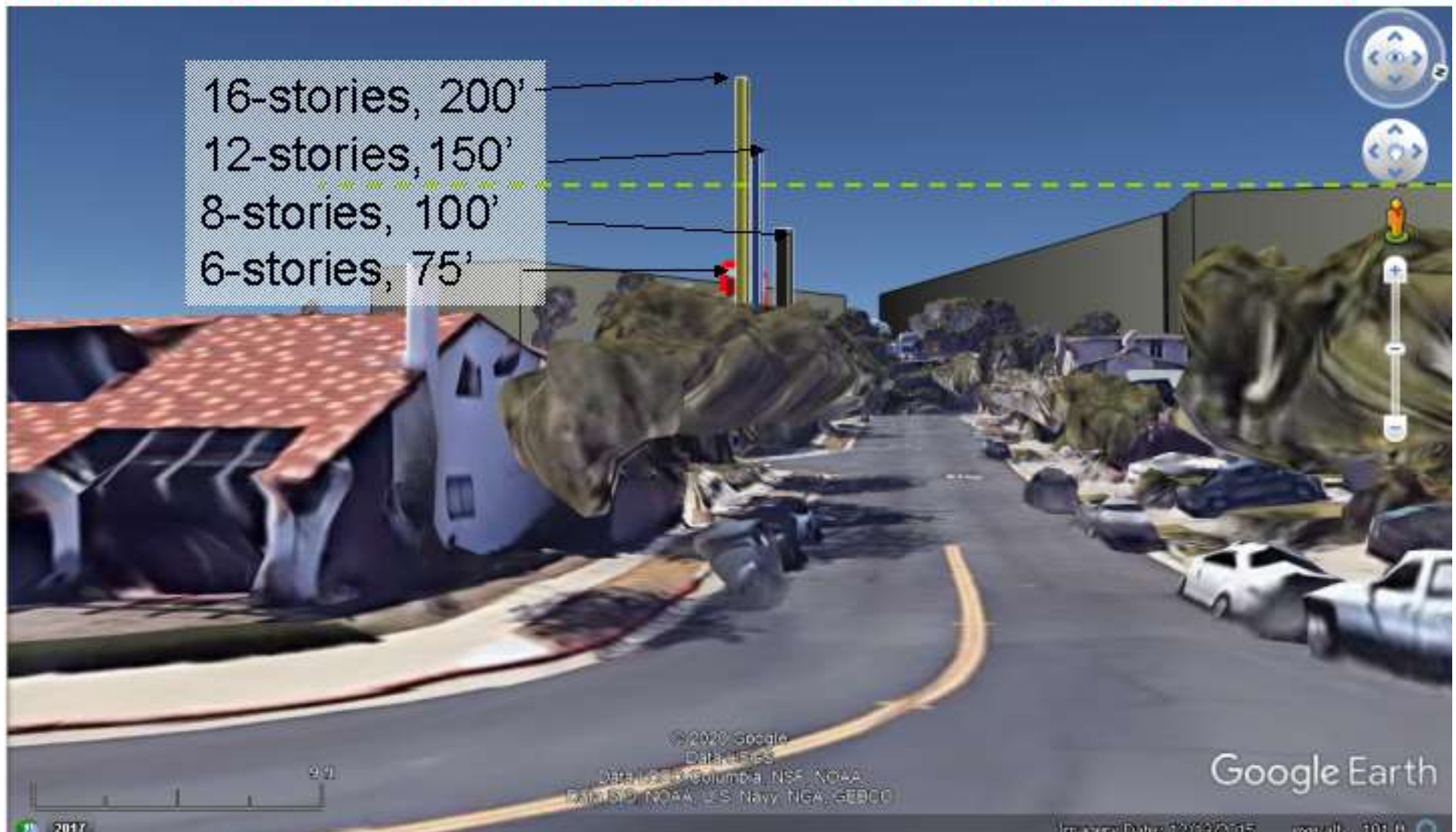
**Current BCHD Campus View from Towers & Redbeam – RED is 75 foot tall**  
**“900sqft Penthouse” ILLUSTRATIVE MARKER POLES are 100 foot, 150**  
**foot and 200 foot tall.**



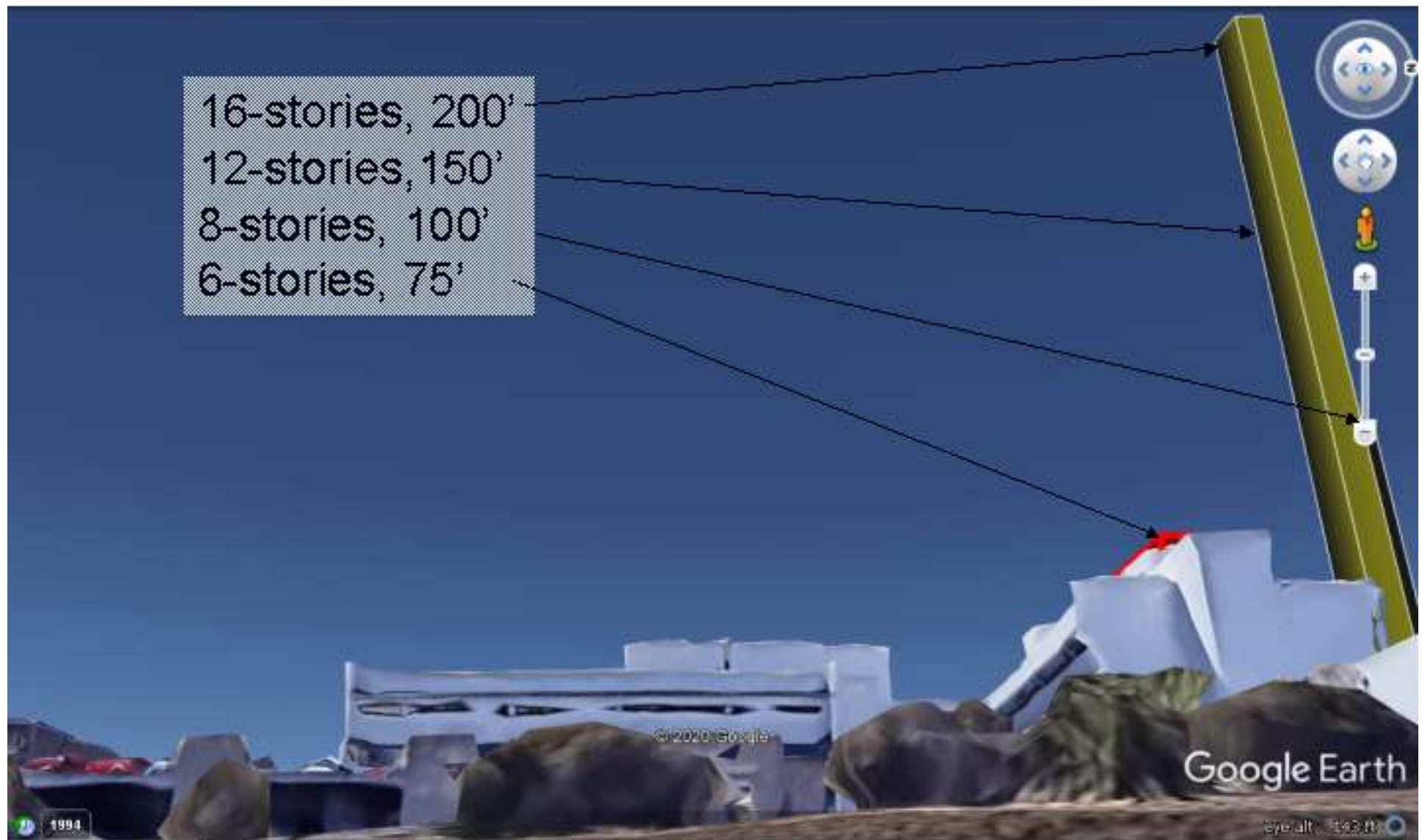


**Proposed BCHD Campus View from Towers & Redbeam – BCHD  
PROPOSED BUILDINGS TALLER than the existing hospital and CLOSER  
to the street, appearing about 135 FEET TALL!**

**VISUALLY JUST LIKE REBUILDING THE HOSPITAL AS 10-STORIES  
ALONG FLAGLER ABOVE REDBEAM/MILDRED/TOMLEE RESIDENTS**



**Current BCHD Campus View from Diamond culdesac – RED is 75 foot tall  
“900sqft Penthouse” ILLUSTRATIVE MARKER POLES are 100 foot, 150  
foot and 200 foot tall.**





**Proposed BCHD Campus View from Diamond culdesac – BCHD  
PROPOSED BUILDINGS TALLER than the existing hospital and CLOSER  
to the street, appearing about 125 FEET TALL!  
VISUALLY JUST LIKE REBUILDING THE HOSPITAL AS 10-STORIES  
ALONG DIAMOND EAST OF PROSPECT AT 510 MOB PARKING LOT/CDC**

