BLUE FOLDER ITEM

Blue folder items are additional back up material to administrative reports and/or public comments received after the printing and distribution of the agenda packet for receive and file.

CITY COUNCIL MEETING
JANUARY 20, 2026

N.1 DISCUSSION AND POSSIBLE ACTION ON THE GENERAL PLAN-LAND USE ELEMENT UPDATE WITH A FOCUS ON THE BUILDING INTENSITY (FLOOR AREA RATIO) LIMITS FOR THE PUBLIC/INSTITUTIONAL (PI) AND "OTHER" NON-RESIDENTIAL GENERAL PLAN LAND USE DESIGNATIONS

CONTACT: MARC WIENER, COMMUNITY DEVELOPMENT DIRECTOR

- **PUBLIC COMMUNICATION**

From:	Carl Paquette
To:	CityClerk; James Light; Brad Waller; Chadwick B. Castle; Paige Kaluderovic; Zein Obagi; Scott Behrendt; Marc Wiener; Sean Scully
Subject:	Agenda Item N1
Date:	Monday, January 19, 2026 3:51:06 PM

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I have been against the over development of the land the BCHD wants to hand off to private developers that will be detrimental to the surrounding area and the Redondo Beach tax payers.

My biggest objection is to the additional traffic it will add to Beryl Street and to Prospect. The morning and afternoon traffic during the school year is already choked due to the narrow streets and traffic signs/signals.

It will also be detrimental to property values in the adjacent neighborhoods.

BCHD cannot be trusted to preserve neighborhood safety, character or value. BCHD must have a Floor Area Ratio cap of 0.5 (preferred) or 0.75 (maximum). The only reason that BCHD is requesting authority to DOUBLE the size of the campus must be due to a hidden plan. BCHD's doubling of the campus would lead to catastrophic negative impacts on the surrounding thousands of residents' health and welfare with traffic, noise, pollution and other negative impacts.

Thank you.

Respectfully submitted,

Carl Paquette
cdp56c@verizon.net

From:	Jill Klausen
To:	CityClerk; Zein Obagi; Scott Behrendt; Paige Kaluderovic; Brad Waller; Chadwick B. Castle; Joy Ford
Subject:	Agenda Item N1, In SUPPORT of limiting BCHD to a 0.5 FAR ONLY
Date:	Monday, January 19, 2026 3:47:15 PM

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BCHD must have a Floor Area Ratio cap of 0.5. Nobody in the area wants this monstrosity built. We have been fighting against this (and winning) for years. As OUR elected representatives on the council, it is your OBLIGATION to abide by the wishes of your constituents, not the graft or influence of private, for-profit corporations, which is what BCHD is advocating for with this project.

BCHD's doubling of the campus would lead to catastrophic negative impacts on the surrounding thousands of residents' health and welfare with traffic, noise, pollution, and a heavier burden on services, including 911 emergency calls.

Here are the facts: "According to a new AARP 'Home and Community Preferences Survey.' Data shows that 77 percent of adults 50 and older want to remain in their homes for the long term — a number that has been consistent for more than a decade. …

"Respondents said they value communities that provide access to clean water, healthy foods, quality health care and safe outdoor spaces."

https://www.aarp.org/home-living/home-and-community-preferences-survey-2021/

"A growing body of evidence shows that access to green space in urban areas can bring considerable benefits to the health and well-being of city residents. These benefits may include improved cognitive development and functioning, reduced symptom severity of attention deficit hyperactivity disorder, reduced obesity, and positive impacts on mental health."

https://www.yesmagazine.org/environment/2021/04/27/denver-community-health-green-space

A Health District that ignores the needs and desires of their constituents in the community for the sake of private corporate profits must be reined in by those we put in place to be our voices. That's you, by the way.

We are asking you to do the right thing for the community and LIMIT the FAR for BCHD to 0.5.

Thank you

From:	Stephanie Dyo
To:	Joy Ford; CityClerk; cityclerk@manhattanbeach.gov; cityclerk@hermosabeach.gov; James Light; Paige Kaluderovic; Mike Witzansky; Scott Behrendt; Chadwick B. Castle; Brad Waller
Subject:	BCHD
Date:	Monday, January 19, 2026 7:21:50 PM

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I SUPPORT passage of Agenda Item N1 - BCHD to a 0.5 or 0.75 FAR ONLY. BCHD's planned OVERDEVELOPMENT with 100% Private Developers should not be SUPERSIZED. Passage is required because BCHD cannot be trusted to self-limit its 100% PRIVATE DEVELOPERS.

BCHD has a history of lying to the public.

At the October 1, 2024 RB Council Meeting, BCHD Board Member Poster made the ABSOLUTELY FALSE STATEMENT TO THE COUNCIL "your own lawyers had to remind them during a public meeting and on the record to stop targeting BCHD in their remarks." RB Planning Commissioners came to the Council and demonstrated with TRANSCRIPTS that Poster lied to the City Council.

In a July 2025 ER News interview, CEO Bakaly claimed that the 4-story hospital was 60-feet tall. The Board has previously CERTIFIED to the STATE that the 4-story hospital is only 51.5-feet tall at the top of its parapet (the wall around the roof of the building) so that actual roof is under 50-feet, NOT 60-FEET.

Untruthful statements are made to the Council and the Public from the HIGHEST LEVELS OF BCHD. In fact, BCHD letter to the Council contains a variety of misleading statements as demonstrated below.

DO NOT ALLOW BCHD TO DESTROY OUR NEIGHBORHOODS WITH SUPERSIZED PRIVATE DEVELOPMENT TO SERVICE 80% OR MORE NON-RESIDENTS WHILE DAMAGES ARE ALL LOCAL!

REDLINE OF BCHD'S CLAIMS TO THE CITY OF REDONDO BEACH

Mayor and City Council:

Like the City of Redondo Beach, Beach Cities Health District's (BCHD) mission is focused on serving the long-term and evolving needs of the community. Unlike the City, BCHD extends its services via ALLCOVE to a service area of 1.4M population. Likewise, only TWO (2) BCHD Programs require residency. All other are open to all comers, inside or outside the District. Public institutions like the City and BCHD have remained responsive to changing demographics, service delivery models and community priorities, and BCHD values planning frameworks that support this adaptability while remaining compatible with the community.

As the City Council continues its deliberations on the General Plan update, I'd like to share the following perspective as part of the broader discussion on public institutional uses and Floor Area Ratio (FAR) caps. As you know, state law calls for general plans to address land use for public buildings and grounds and to include standards related to population density and building intensity across all land use categories (California Government Code § 65302(a)).

While state law requires general plans to include standards addressing building intensity, **it does not require a FAR to meet this obligation**. FAR is one commonly used measure, but California Code § 65302(a) provides flexibility for cities to rely on a range of development standards to address scale and intensity. Cities may satisfy section 65302(a) through other accepted development-intensity standards, such as dwelling units per acre, lot-coverage requirements, building-height limits, or other development standards that control the overall size or mass of development.

From BCHD's perspective, this flexibility has particular relevance for the General Plan and public institutional uses, which must remain adaptable to ensure public-serving facilities can continue to meet both current and future community needs. **BCHD recommends that the City of Redondo Beach not include FAR caps in the General Plan for public institutional uses**, where the State statute can be complied with by using more general development standards that regulate scale and intensity. BCHD is wishful, but inaccurate. Achieveable, up-front standards are the clear intention of the State policy. BCHD's wish for unlimited height and square feet is both non-compliant and a dangerous precedent.

BCHD also notes that public institutions are already accountable to the electorate through elections of governing board members every two years. FAR caps in the General Plan could duplicate existing oversight mechanisms and may limit the ability of future governing bodies to respond to changing community needs. Speaking of elections, BCHD's Measure BC ($30M to prepare the campus for redevelopment and build the 91% non-resident service territory ALLCOVE building) was soundly rejected in November of 2024. It was the ONLY revenue measure rejected. It failed to garner a

simple majority as $600M+ of other bond measures passed by 2/3rds votes. **BCHD DOES NOT HAVE VOTER SUPPORT FOR ITS OVERDEVELOPMENT SCHEME. In fact, voters wouldn't even approved PREPARATION for the BCHD DEVELOPMENT SCHEME.**

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If the City Council nonetheless chooses to proceed with a FAR cap for public institutional use, BCHD respectfully requests that it be consistent with the FAR applied to City Hall, the City's other large public institutional property. In the Fall of 2024, the City adopted an addendum to the Environmental Impact Report (EIR) concluding that maintaining the same FAR level (1.25) for these large public institutional properties would result in no significant environmental impacts. In light of that environmental review, applying a lower FAR standard in the General Plan to BCHD would raise concerns regarding internal consistency within the General Plan and give the appearance of targeting a specific property. **The City has no need for increased FAR caps at this time.** All Public land uses **should be capped at the maximum of their existing FAR or 0.5 to 0.75 FAR.**

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From: Frank Briganti
To: CityClerk
Subject: BCHD proposal
Date: Monday, January 19, 2026 11:33:48 AM

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Oppose FAR 1.25. Far too much building structures. Buildings higher than now.
construction ,noise, traffic all WILL severely impact over 300+ homes in the area!
BCHD has not produced documents showing: if there is any conflict of interest ,
BCHD has not produced any documents for': Completion Bonds & financial.
No construction site guidance for . Laborers,equipment,& TRUCK ROUTES!
Equipment & too many trucks will ingross are neighborhoods.
Towers street school (Beryl/Towers) will not be in a Safe Area!!
THERE IS MUCH MORE.
THANKS DR. FRANK B. TORRANCE

Sent from my iPad

From: Anita or Bob Caplan
To: CityClerk
Subject: BCHD
Date: Saturday, January 17, 2026 9:58:21 PM

You don't often get email from arcaplan2@gmail.com. Learn why this is important

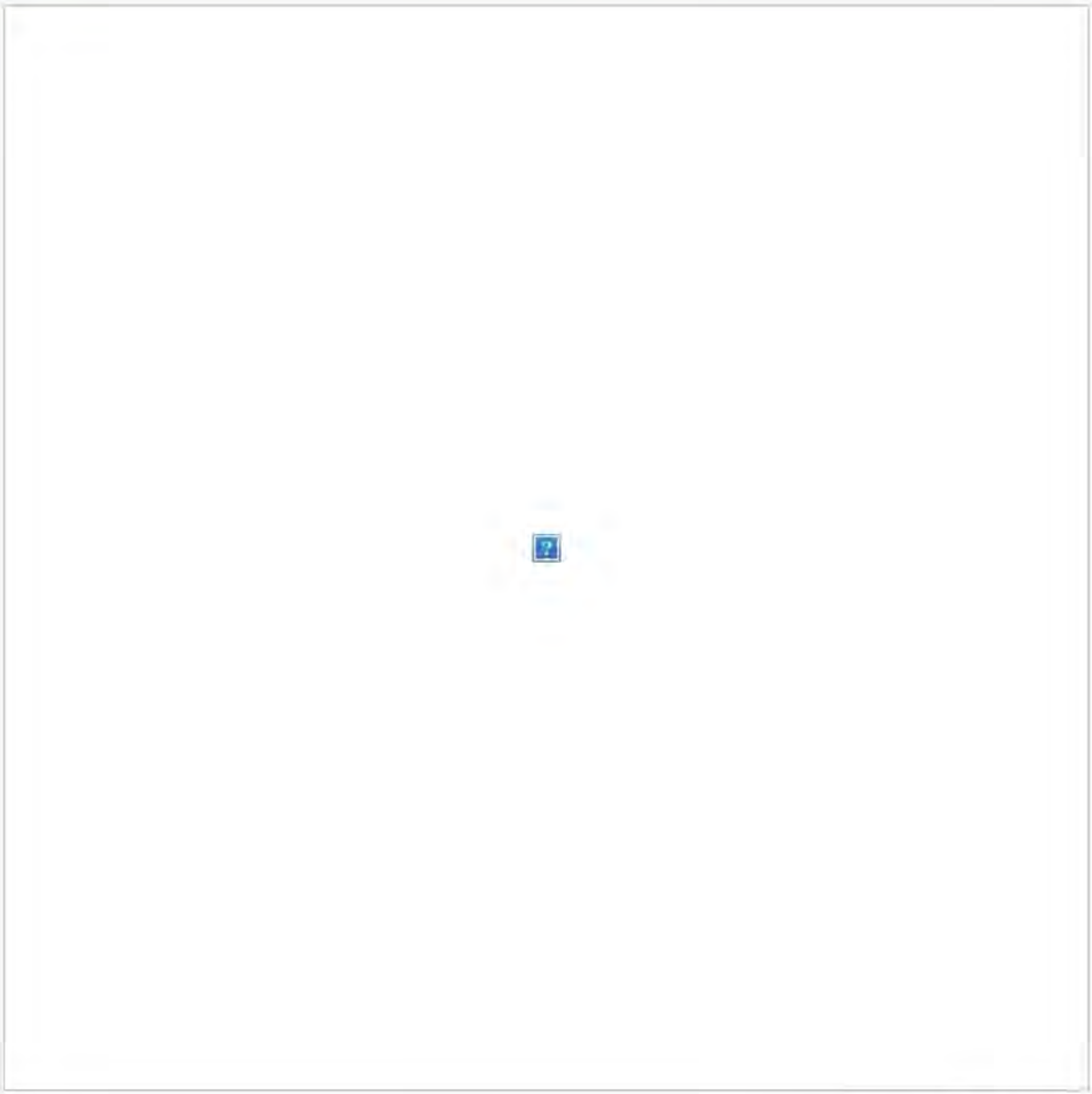
*CAUTION: Email is from an external source; **Stop, Look, and Think** before opening attachments or links.*

Oppose.
Regarding Agenda Item N1, I* OPPOSE limiting only BCHD to a 0.75 FAR while allowing higher FARs for other public institutional uses such as City Hall. *I SUPPORT a uniform 1.25 FAR for BCHD, City Hall and the Annex."

The center for health and fitness is terrific. So many of the programs to meet the needs of our residents.
Anita Caplan
Redondo Beach

From: Beach Cities Health District
To: CityClerk
Subject: City Council meets 1/20 - Support BCHD; Keep public institutional use levels the same for the Health District and City - Support a 1.25 FAR
Date: Saturday, January 17, 2026 1:44:49 PM

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January 17, 2026

Redondo Beach City Council expected to discuss Floor Area Ratio (FAR) during General Plan discussion Tuesday, Jan. 20

Your voice matters! Support Beach Cities Health District as the City Council

considers its General Plan update and a possible cap on Floor Area Ratio (FAR) for public institutional zones, which apply to public agencies like BCHD and the City.

The Redondo Beach City Council will continue its discussion and may take action on the City's General Plan update at its Jan. 20 meeting at 6 p.m. The General Plan update includes a proposed FAR limit for public institutional uses, which could affect campus redevelopment plans and our ability to provide health and wellness services to the community.

To best serve the community, flexibility in a FAR cap is important to ensure public-serving facilities can adapt over time, make efficient use of existing land and continue meeting the evolving needs of Beach Cities residents. Importantly, the City of Redondo Beach formally studied a 1.25 FAR for BCHD and recently found that it would result in no significant environmental impacts for the City.

The current proposal would apply lower FAR limits to BCHD than to select City of Redondo Beach properties with the same land use designation, resulting in unequal treatment of BCHD. This could limit BCHD's ability to sustain and expand vital community programs and services, including:

- The Center for Health & Fitness
- Social Workers for disabled and older adults
- allcove Beach Cities - youth wellness center
- Blue Zones Project
- LiveWell Kids Garden and Nutrition
- Summer Free Fitness and BCHD's numerous other free programs and services

Here are some ways you can support BCHD at the next City Council meeting on Tuesday, Jan. 20:

1) **Submit a Comment:**
   - E-comments may be submitted before and during the City Council meeting. eCOMMENT: Comments may be entered directly on the City's website at: https://redondo.granicusideas.com/meetings

Check the box "OPPOSE."
Here is suggested text for your comment: ***"Regarding Agenda Item N1, I OPPOSE limiting only BCHD to a 0.75 FAR while allowing higher FARs for other public institutional uses such as City Hall. I SUPPORT a uniform 1.25 FAR for BCHD, City Hall and the Annex."*** *You can also tell the City Council what BCHD Programs and Services mean the most to you.*

1. Public comments can be entered before and during the meeting.
2. Select a SPECIFIC AGENDA ITEM to enter your comment; **(N1 is the Item regarding BCHD and the General Plan update)**
3. The public will be prompted to sign up to create a free personal account (one-time), and then comments may be added to each Agenda item of

interest.

4. Public comments entered into eComment (up to 2200 characters; equal to approximately 3 minutes of oral comments) will become part of the official meeting record. Comments may be read out loud during the meeting.

2) Attend the City Council Meeting:

- Attend the City Council meeting in person
    - Make or submit a comment, OR just attend to show your support by wearing a BCHD t-shirt!
- Attend the meeting via Zoom and comment. (Zoom instructions are available on the meeting agenda)
  Date: Tuesday, January 20
  Time: 6:00 p.m.
  Location: City Council Chambers, 415 Diamond Street, Redondo Beach

Click here for City Council Meeting Information

3) Email the Redondo Beach City Clerk and City Council:

Tell them you support keeping public institutional land uses the same for BCHD and the City with a 1.25 FAR in the General Plan update.

EMAIL: To participate by written communication, EMAILS MUST BE RECEIVED BEFORE 3:00 P.M. THE DAY OF THE MEETING. Public comments may be submitted by email to cityclerk@redondo.org. In addition to emailing the City Clerk, cc: the Mayor and City Council members on your comments:

Mayor Jim Light: james.light@redondo.org
District 1: **Council Member Brad Waller**: brad.waller@redondo.org
District 2: **Council Member Chadwick Castle**: chadwick.castle@redondo.org
District 3: **Council Member Paige Kaluderovic**: paige.kaluderovic@redondo.org
District 4: **Council Member Zein Obagi, Jr**.: zein.obagi@redondo.org
District 5: **Mayor Pro Tem/Council Member Scott Behrendt**: scott.behrendt@redondo.org

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In Health,

Tom Bakaly
CEO
Beach Cities Health District

What is a Floor Area Ratio?

Floor Area Ratio (or FAR) – is a technical planning term that determines how much can be built on parcels throughout the city. It is calculated by dividing the gross floor area of a building by the total lot size.

Campus Progress Continues

Progress continues on the BCHD Campus with several key initiatives moving forward to serve the community:

Former South Bay Hospital

In November 2025, the Board decided to move forward with a Letter of Intent (LOI) for the Request for Expressions of Interest (RFEOI) for the former South Bay Hospital and parking lot. Mar Ventures/Continental Development has been identified as a potential partner. The LOI process is expected to begin in February 2026 and will guide potential partnerships and uses that align with community health and public benefit. A full update will be shared at the February Board meeting.





Center for Health & Fitness

The Center for Health & Fitness relocation is on schedule to move to the 510 Building, with a target move-in date of March 2027. This ensures continued access to fitness programs and services for the community.

allcove Beach Cities

allcove Beach Cities is moving forward with its plans and is targeting early Q2 2026 for groundbreaking. This will continue to bring vital mental health and wellness resources for young people to the campus.

PACE

BCHD has secured space on the campus for a Program for All-Inclusive Care for the Elderly (PACE) program, aiming to provide services to older adults and establish a long-term tenant in the 510 building.

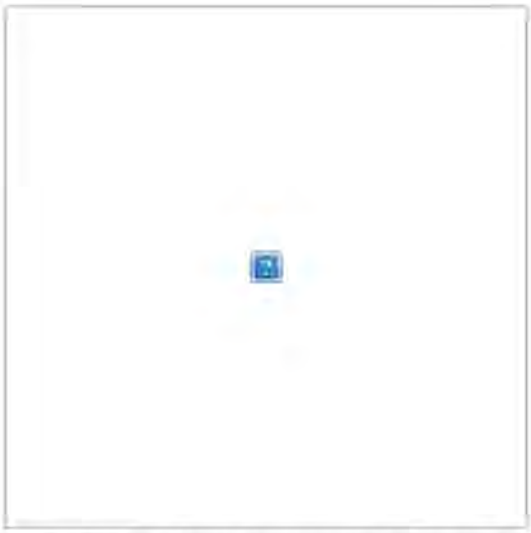
Bike & Pedestrian Path

The Diamond Street Bike and Pedestrian Path was completed in 2003. The project installed a Class I bike path, with new lighting, pavement, bicycle traffic signal sensors and new landscaping

Campus Facts

Beach Cities Health District has been working closely with the community since 2017 to reimagine our medical campus – home to our 64-year-old former hospital building located at 514 North Prospect Avenue in Redondo Beach – into a Healthy Living Campus for all ages. Since May 2017, BCHD has held more than 60 meetings, drawing more than 1,000 comments regarding the modernization of its property.

For accurate information regarding the Healthy Living Campus project, visit https://www.bchdcampus.org/.



extending from Diamond to Beryl and Prospect to Flagler



and former hospital site does not currently meet tenant needs and is in need of a seismic upgrade

Learn More

Hybrid BCHD Board Meeting

BCHD holds monthly public board meetings at 6:30 p.m. (except Aug. and Dec.). Details about the meeting and agenda can be found on our website - click the "Learn More" button below.

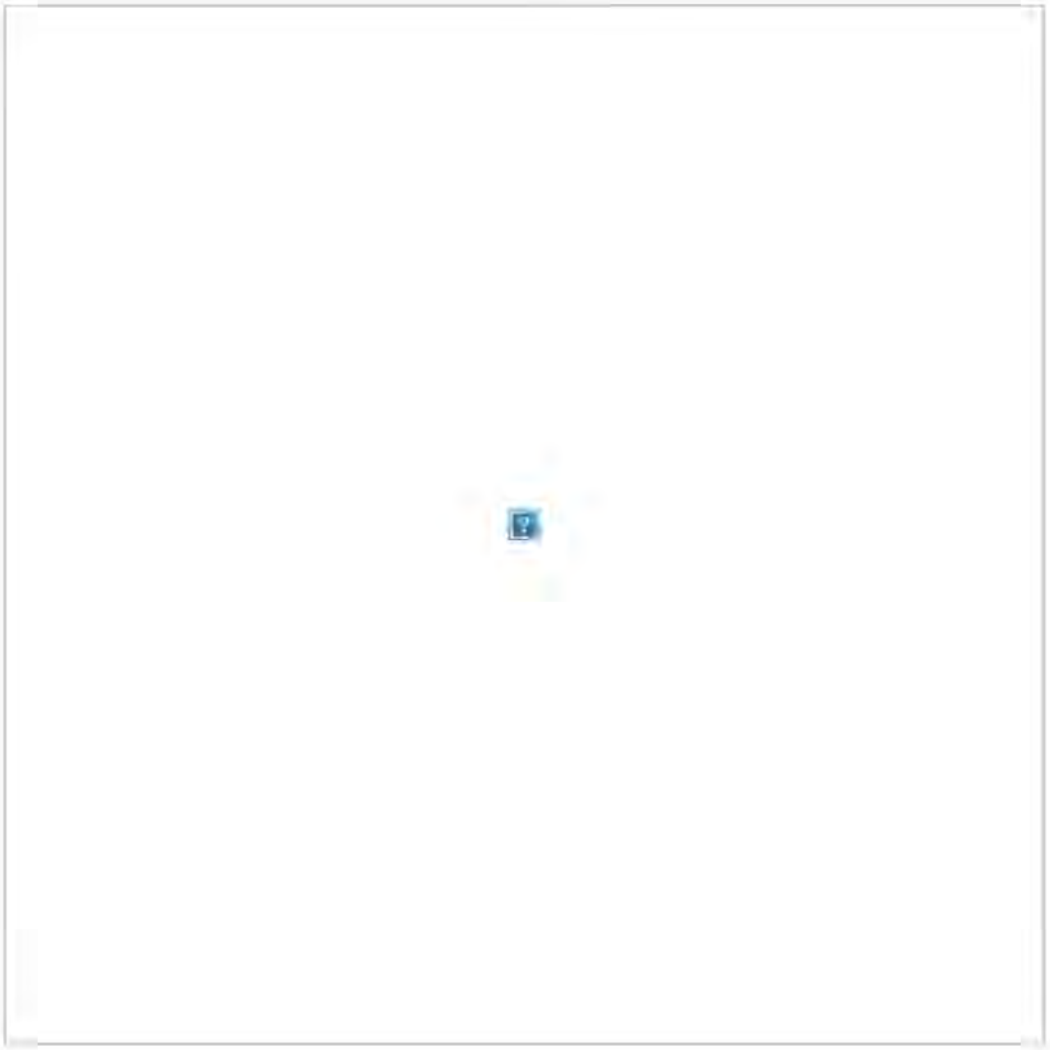
Wednesday, January 28, 2026

Board of Directors Meeting
6:30 p.m.

Learn More











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Constant Contact

From: Mike and Jill
To: Paige Kaluderovic; CityClerk; James Light
Subject: Comment on January 20 Agenda Item N1
Date: Sunday, January 18, 2026 3:24:49 PM

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Regarding Agenda Item N1,

I SUPPORT limiting BCHD to a 0.5 or 0.75 FAR ONLY, which is consistent with the current structure FAR on the Prospect Avenue site. This approach is a fair compromise between BCHD objectives and the surrounding neighborhoods.

Please do not allow BCHD to destroy the character of the surrounding residential neighborhoods!

Best Regards and Happy New Year to the City Council and Staff,

Mike Jamgochian

Redondo Beach

Open Access

Original Article

Consequences of traffic noise in residents of Karachi, Pakistan

Imtiaz Ather Siddiqui[1], Sohaib Nizami[2], Rida Rouf Chandio[3], Saad Nizami[4], Nazish Sikander[5], Sana Ashraf[6]

ABSTRACT

Objective: To find out effect of road traffic noise on human beings in busy places of Karachi, working at these places and to compare its results with the previously done studies on this subject.

Methods: This prospective epidemiological study was designed to evaluate effects of Noise induced hearing Loss due to road traffic at different places (Gurumander, Tibet Centre, Marry Weather Tower) of Karachi. A sample of 125 cases were randomly selected who had noise exposure of 90 dB or above of their surroundings for more than 6 months. The study was conducted from October 1st 2013 to January 1st 2013.

Results: The minimum age was 18 years while maximum age was 47 years. The age group found most affected was from 23 years to 27 years. The males were 84% and females 16%. Subjects exposed to noise for more than 12 hours per day were 36.8%.Varying degree of hearing loss was evaluated in subjects where 17.6% were normal, 33.6% had mild hearing loss, 45.6% had moderate and 3.2% had moderately severe hearing loss. Traffic noise was found to bother 55.2% of subjects.

Conclusion: Analysis of data indicates an enormous increase in noise levels as compared to previous studies. This study establishes that there exists a concrete direct link between NIHL and duration of exposure to noise above permissible levels. Traffic authorities should initiate measures to reduce the noise levels in the city particularly at more noisy places.

KEYWORDS: Noise, Traffic, Hearing impairment, Noise Pollution, Noise induced hearing loss, Tinnitus.

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* Final Revision Accepted: February 12, 2015

INTRODUCTION

Noise was born the day wheel was invented. In fact the invention of wheel is the birth of technology and noise both. Noise is any unjustifiable interference within the normal human hearing frequency range that is from 20 Hz to 20000 Hz (NIOSH, 1991).[1]

Rapid urbanization in the past many years has led to increase in noise pollution. It has adverse effects not only on hearing but has many psychological and pathological impacts on human health. Noise is a part of daily human activity and is thus unavoidable. Apparently one cannot distinguish between noise and sound.

Noise is any kind of sound that is perceived as unharmonious or disorganized. It is broadly categorized into occupational noise and environmental noise. Environmental noise is one originating from various activities except noise

produced at industrial workplace i.e. occupational noise. The major contributors to the environmental noise are road traffic, rail traffic and air traffic while the major contributors of occupational noise include industrial machinery, ventilation system, construction equipment and workplace noise along with industrial noise. Vulnerable groups within the population which are usually encountered are factory workers, labourers, auto rickshaw drivers, shopkeepers, street vendors, mechanics, denters and traffic Police personal.[2] Exposure to noise in day to day life leads to mood changes, anxiety, sleep disturbance and reduced work efficiency. Ceremonial noise in residential area is also a source of discomfort and agitation. NIHL may even cause platelet clumping which may lead to cardiovascular ailments.[3]

Prolonged exposure to noise can cause noise-induced hearing loss which is unknowingly harmful and leads to irreversible hearing impairment.[4] The people who are chronically exposed to noise are more prone towards developing reduced hearing sensitivity as compared to the non-exposed people. Industrial noise in Pakistan is greatest emerging from weaving looms of textile industry, steel mills and airports in the largest cities. For instance, average noise levels in a textile mill in Karachi were found to vary between 85 and 112 dB. In the sheet metal industry, 8% of workers had noise-induced hearing impairment. Another study of Karachi textile workers found that 22% of those exposed to noise had noise-induced hearing loss compared to 2% of controls. More than half of the cases with noise induced hearing loss also had tinnitus.[2] A significant difference in prevalence of hearing loss (more than 30db) between the noise exposed and non noise exposed group (P <0.5) in aviation workers was noted in a study conducted in Karachi.[4]

The permissible noise exposure varies from country to country. Occupational safety and Health Administration Agency (OSHA) in US allows exposure of up to 90 dB for a period of 8hours/ day, whereas most other countries allow 85 dB for 8 hours duration.[5] In Europe noise-induced hearing loss was estimated for 10.3% of all occupational diseases between 1999 and 2001. In Washington, USA, a survey was conducted in (2009) which had analyzed 1999–2004 data from the National Health and Nutrition Examination Survey (NHANES) to determine the burden of occupational exposure from self-report. They found out that 22 million workers (17% of the population-weighted survey) reported exposure to hazardous occupational noise and out of these, 34% reported nonuse of hearing protective devices (HPDs).[6]

The prevalence of NIHL in New Zealand as per ACC data reveals that there has been a substantial increase in the number of new NIHL claims annually, rising from 2823 in July 1995-June 1996, to 5580 in July 2005-June 2006.[7] In 2003 the relevant medical costs(hearing aids, treatment and assessment) were as high as five times the cost in 1995.[8] In Brazil, the presence of suspected NIHL was 28.5% and the finding was higher among those working in the noisier areas than those working in lower noise areas (38.8% versus 24.2%).[9] In India another study emphasized on the traffic policemen working for 10–12 hours daily in a noisy surroundings. 84% of the sample showed hearing loss and reported at least some hindrance in hearing by one or both ears.[10]

It has been officially recorded that Karachi is ranked eighth in world figures for noise pollution.[11] According to WHO, responsibility lies on the government to protect the community from exposure to unwanted noise and reduce noise emission and not just the sources and take necessary measures to protect risk groups.[2]

This study was planned to find out effect of road traffic noise on human livings and working at these places for protection of NIHL. The study was conducted in such a way that effects of noise on residents and workers of these noisy places were also determined. Another aim in starting this study was to compare its results with the previously done studies on this topic.

METHODS

A hospital based prospective epidemiological study was conducted at Jinnah Sindh Medical University (JSMU) designed to evaluate effects of noise-induced hearing loss due to road traffic at Gurumander, Tibet Center, Marry Weather Tower places of Karachi. A sample of 125 cases were randomly selected who had noise exposure of 90 db or above of their surroundings for more than 6 months.

Noise levels at different busy traffic intersections of Karachi were taken by a sound level meter branded "Standard Sound Level Meter ST-85A".The noise meter was calibrated as per specifications laid by American Audiological Academy. Five spots were selected where noise level was recorded between 100db to 110db from dawn to dusk. Subjects were selected who were workers of different trades at these places.

Data was collected on a specified Performa focused on subject's profession, duration of noise exposure at work place, presence of tinnitus and other symptoms of NIHL and community response to noise.

Consent was taken from each subject and pure tone audiometery was carried out in a sound proof room at ENT Department, Jinnah Postgraduate Medical Centre. Pure Tone Audiogram on a screening mode of 500Hz, 1000Hz, 2000Hz, 4000Hz and 8000Hz was obtained in a sound proof room. The biase were eliminated to significant degree during the study. The data was analyzed on IBM SPSS Statistics v20. The duration of study was from 1st October 2012 to 1st January 2013.

Exclusion Criteria: This consisted of:

- Age above 50 years and below 10 years.
- Any history of previous Otological disease.
- History of Ototoxic drug intake for a period of more than a month.
- History of high-grade fever for more than one week.
- Known case of Diabetes Mellitus, Hypertension or any systemic organic disease.

RESULTS

In a series of 125 subjects, the minimum age was 18 years while maximum age was 47 years. The mean age was calculated to be 30.87 years. The age group found most affected was from 23 years to 27 years.

The males were 84% (105) and females 16% (20). Male- to female ratio came 5.25:1. Subjects exposed to noise for more than 12 hours per day were 36.8% (46). Subjects who complained of tinnitus were 32.8% (41). A notch at 4000 Hz on PTA air conduction was found in 80% (100) Fig.1. This notch is pathognomonic of NIHL whereas only 12.8% (16) were aware of hearing impairment.

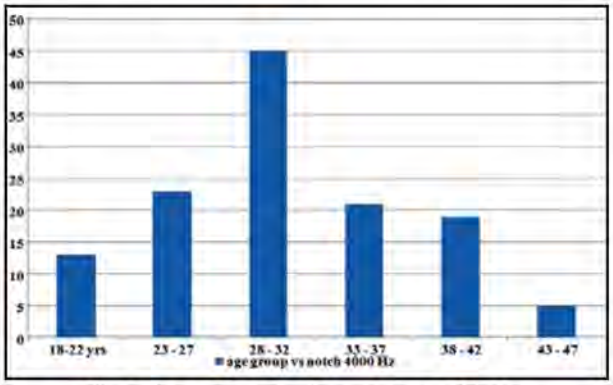


Fig.1: Age group having notch at 4000Hz.

Table-I: Degree of hearing loss encountered in subjects.

Hearing loss (Decibel)	*Degree of hearing loss*	*No. of subjects*
<26	Normal hearing	17.6 %
26-40	Mild	33.6 %
41-45	Moderate	45.6 %
56-70	Moderately Severe	3.2 %
71-90	Severe	0
>90	Profound	0

Varying degree of hearing loss was evaluated in subjects where 17.6% (22) were normal, 33.6% (42) had mild hearing loss, 45.6% (57) had moderate and 3.2% (4) had moderately severe (Table-I).

Subjects experiencing hearing impairment for loud conversation were 4% (5), for telephone bell 10.4% (13) and television 23.2% (29).Community response to noise was also assessed and 69.6% (87) experienced annoyance due to noise, 42.4% (53) suffered sleep disturbance and 45.6% (57) claimed their working capacity being compromised due to noise (Fig.2). Moreover, communication difficulties were encountered by 28% (35) and 13.6% (17) had vertigo. Traffic noise was found to bother 55.2% (69) of subjects.

DISCUSSION

Excessive noise is a health hazard across the globe with considerable social and physiological impacts including NIHL. Environmental noise among all categories of noise affects a bigger population than other categories. Road traffic noise has been established as the most significant source in the city of Karachi.[11] The population of Karachi remains unaware of this disability until irreversible damage has occurred. A substantial amount of Pakistan's population living in the mega metropolitan city of

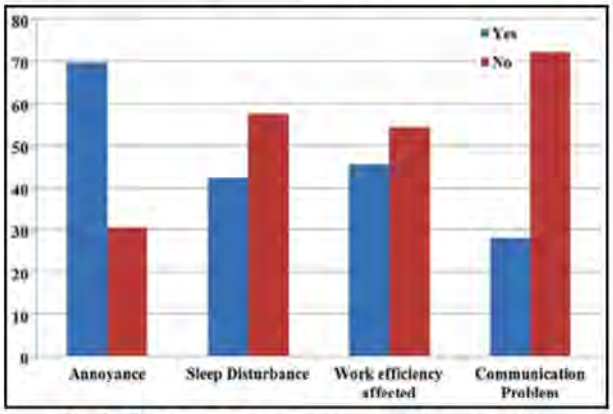


Fig.2: Community response of society to noise.

Karachi is at risk of hearing loss or this may lead to an overall high incidence of hearing impairment if drastic preventive measures are not taken.

This study was on traffic noise which affects adversely, unknowingly to all age groups of population. There are other studies carried out in Karachi such as study done by Itrat Javed et al.[12] This study encompasses almost most of our objectives but the gender is not mentioned which is presumably all subjects are males while our study has 84% males and 16% females. This represents more close analysis. This study is silent on the type, calibration of the Pure Tone Audiometer and environment of the recording. We have mentioned the type and adopted the American standards of calibration in our study. In Itrat Javed's study,[12] the subjects belong to three categories of noise affectees were selected i.e. Rickshaw drivers (13.5%), traffic constables (39.5%) and shopkeepers (29.5%). In our study there were eight categories comprising from all walks of life that are at a potential danger of hearing impairment due to road traffic noise. They are labourer working across the road (46.03%), auto rickshaw drivers (17.46%), shopkeepers (13.49), auto workshop mechanic (9.52%) traffic constables (5.58%) street venders (4.76%) and auto workshop denters (3.16%).

Another study on Spatial and Temporal patterns of noise exposure due to road traffic in Karachi[13] found that maximum peak noise was over 101 dB which is close to 110dB, this is the level which can cause possible hearing impairment as per WHO guide lines. In our study residents and workers of above mentioned places of Karachi has developed hearing impairment due to noise exposure. This needs attention of authorities to reduce noise level for prevention of hearing impairment and annoyance.

Earliest study on road traffic noise in Karachi was conducted by Zaidi S.H in 1989. Which noise levels were measured at similar locations of Karachi as in our study. In this study 99dB was the noise level while this has increased hence people suffering from hearing impairment have also increased in our study. Road Traffic was also identified as source of noise. Our study has validated this old finding as it is still there and needs attention for authorities to prevent hearing impairment.[14]

Keeping in view the sheer number of persons exposed to noise, probed in depth the relationship between environmental noise and its effect on health. Madrid (Spain) is a densely populated metropolitan city like Karachi. Here 80% of all environmental noise is attributed to road traffic. This is an identical situation to our study. The study carried out to quantify avoidable deaths due to impact of noise level on daily cardiovascular and respiratory mortality among age group>65 years in Madrid.[15] Our study shows an enormous increase in noise level in Karachi as compared to previous studies. This in turn increases the impact on cardiovascular and respiratory systems of Karachi citizens.

Traffic noise exposure being the dominant community, with annoyance, which is an indicator of chronic health conditions. A study was also conducted on adult Indian population to explore association between residential road traffic noise and self-reported annoyance. This cross sectional study revealed the prevalence of annoyance was more for males. The vulnerable age groups were 34-40 years followed by 50-60 years. It also found association of residential road traffic noise with annoyance.[16]

In contrast our study noise effected sub age group was different i.e. 28-32 followed by 23-27 years, indicating younger population in contrast to Indian study. While annoyance is almost reaching 70% in our study.

CONCLUSION

There is an enormous increase in noise levels in Karachi as compared to previous studies. This study establishes that there exists a concrete direct link between NIHL and duration of exposure to noise above permissible levels. Traffic authorities should initiate measures to reduce the noise levels in the city particularly at high noisy places. Noise meters should be installed on major noise producing intersections. When these noise meters indicate noise levels above 90 dB (permissible level) traffic should be diverted to other areas to reduce noise level.

Grant Support & Financial Disclosures: None.

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Authors' Contribution:

IAS: Conceived, designed, statistical analysis, editing of manuscript, review and final approval of manuscript.
SN, RRC, SN, NS and SA: Did data collection and manuscript writing.

From:	William Shanney
To:	Joy Ford; CityClerk; cityclerk@hermosabeach.gov; cityclerk@manhattanbeach.gov; James Light; Paige Kaluderovic; Mike Witzansky; Scott Behrendt; Chadwick B. Castle
Subject:	Fw: (FORWARD THIS EMAIL TO THE COUNCIL) Public Comment: Redline of BCHD Incorrect Statements in Bakaly Letter to RB City Council
Date:	Tuesday, January 20, 2026 5:40:48 AM
Attachments:	BCHD Claims Redline v1.pdf image.png image.png

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I SUPPORT passage of Agenda Item N1 - BCHD to a 0.5 or 0.75 FAR ONLY. BCHD's planned OVERDEVELOPMENT with 100% Private Developers should not be SUPERSIZED. Passage is required because BCHD cannot be trusted to self-limit its 100% PRIVATE DEVELOPERS.

BCHD has a history of lying to the public.

At the October 1, 2024 RB Council Meeting, BCHD Board Member Poster made the ABSOLUTELY FALSE STATEMENT TO THE COUNCIL "your own lawyers had to remind them during a public meeting and on the record to stop targeting BCHD in their remarks." RB Planning Commissioners came to the Council and demonstrated with TRANSCRIPTS that Poster lied to the City Council.

In a July 2025 ER News interview, CEO Bakaly claimed that the 4-story hospital was 60-feet tall. The Board has previously CERTIFIED to the STATE that the 4-story hospital is only 51.5-feet tall at the top of its parapet (the wall around the roof of the building) so that actual roof is under 50-feet, NOT 60-FEET.

Untruthful statements are made to the Council and the Public from the HIGHEST LEVELS OF BCHD. In fact, BCHD letter to the Council contains a variety of misleading statements as demonstrated below.

DO NOT ALLOW BCHD TO DESTROY OUR NEIGHBORHOODS WITH SUPERSIZED PRIVATE DEVELOPMENT TO SERVICE 80% OR MORE NON-RESIDENTS WHILE DAMAGES ARE ALL LOCAL!

Sincerely

William and Vivian Shanney

REDLINE OF BCHD'S FALSE CLAIMS TO THE CITY OF REDONDO BEACH

REDLINE OF BCHD'S CLAIMS TO THE CITY OF REDONDO BEACH

Mayor and City Council:

Like the City of Redondo Beach, Beach Cities Health District's (BCHD) mission is focused on serving the long-term and evolving needs of the community. Unlike the City, BCHD extends its services via ALLCOVE to a service area of 1.4M population. Likewise, only TWO (2) BCHD Programs require residency. All other are open to all comers, inside or outside the District. Public institutions like the City and BCHD have remained responsive to changing demographics, service delivery models and community priorities, and BCHD values planning frameworks that support this adaptability while remaining compatible with the community.

As the City Council continues its deliberations on the General Plan update, I'd like to share the following perspective as part of the broader discussion on public institutional uses and Floor Area Ratio (FAR) caps. As you know, state law calls for general plans to address land use for public buildings and grounds and to include standards related to population density and building intensity across all land use categories (California Government Code § 65302(a)).

While state law requires general plans to include standards addressing building intensity, **it does not require a FAR to meet this obligation**. FAR is one commonly used measure, but California Code § 65302(a) provides flexibility for cities to rely on a range of development standards to address scale and intensity. Cities may satisfy section 65302(a) through other accepted development-intensity standards, such as dwelling units per acre, lot-coverage requirements, building-height limits, or other development standards that control the overall size or mass of development.

From BCHD's perspective, this flexibility has particular relevance for the General Plan and public institutional uses, which must remain adaptable to ensure public-serving facilities can continue to meet both current and future community needs. **BCHD recommends that the City of Redondo Beach not include FAR caps in the General Plan for public institutional uses**, where the State statute can be complied with by using more general development standards that regulate scale and intensity. BCHD is wishful, but inaccurate. Achieveable, up-front standards are the clear intention of the State policy. BCHD's wish for unlimited height and square feet is both non-compliant and a dangerous precedent.-

BCHD also notes that public institutions are already accountable to the electorate through elections of governing board members every two years. FAR caps in the General Plan could duplicate existing oversight mechanisms and may limit the ability of future governing bodies to respond to changing community needs. Speaking of elections, BCHD's Measure BC ($30M to prepare the campus for redevelopment and build the 91% non-resident service territory ALLCOVE building) was soundly rejected in November of 2024. It was the ONLY revenue measure rejected. It failed to garner a

simple majority as $600M+ of other bond measures passed by 2/3rds votes. **BCHD DOES NOT HAVE VOTER SUPPORT FOR ITS OVERDEVELOPMENT SCHEME. In fact, voters wouldn't even approved PREPARATION for the BCHD DEVELOPMENT SCHEME.**

If the City Council nonetheless chooses to proceed with a FAR cap for public institutional use, BCHD respectfully requests that it be consistent with the FAR applied to City Hall, the City's other large public institutional property. In the Fall of 2024, the City adopted an addendum to the Environmental Impact Report (EIR) concluding that maintaining the same FAR level (1.25) for these large public institutional properties would result in no significant environmental impacts. In light of that environmental review, applying a lower FAR standard in the General Plan to BCHD would raise concerns regarding internal consistency within the General Plan and give the appearance of targeting a specific property. **The City has no need for increased FAR caps at this time.** All Public land uses **should be capped at the maximum of their existing FAR or 0.5 to 0.75 FAR.**

As the City of Redondo Beach considers these issues, BCHD looks forward to continued collaboration with the City as it plans for the future. Our shared goal is to ensure that public institutions remain able to meet the community's needs both today and in the years ahead.

--

From:	Darryl Boyd
To:	Joy Ford; CityClerk; cityclerk@manhattanbeach.gov; cityclerk@hermosabeach.gov; James Light; Paige Kaluderovic; Mike Witzansky; Scott Behrendt; Chadwick B. Castle; Brad Waller
Subject:	Fwd: (FORWARD THIS EMAIL TO THE COUNCIL) Public Comment: Redline of BCHD Incorrect Statements in Bakaly Letter to RB City Council
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Attachments:	image.png image.png BCHD Claims Redline v1.pdf

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As the City Council continues its deliberations on the General Plan update, I'd like to share the following perspective as part of the broader discussion on public institutional uses and Floor Area Ratio (FAR) caps. As you know, state law calls for general plans to address land use for public buildings and grounds and to include standards related to population density and building intensity across all land use categories (California Government Code § 65302(a)).

While state law requires general plans to include standards addressing building intensity, **it does not require a FAR to meet this obligation**. FAR is one commonly used measure, but California Code § 65302(a) provides flexibility for cities to rely on a range of development standards to address scale and intensity. Cities may satisfy section 65302(a) through other accepted development-intensity standards, such as dwelling units per acre, lot-coverage requirements, building-height limits, or other development standards that control the overall size or mass of development.

From BCHD's perspective, this flexibility has particular relevance for the General Plan and public institutional uses, which must remain adaptable to ensure public-serving facilities can continue to meet both current and future community needs. **BCHD recommends that the City of Redondo Beach not include FAR caps in the General Plan for public institutional uses**, where the State statute can be complied with by using more general development standards that regulate scale and intensity. BCHD is wishful, but inaccurate. Achieveable, up-front standards are the clear intention of the State policy. BCHD's wish for unlimited height and square feet is both non-compliant and a dangerous precedent.-

BCHD also notes that public institutions are already accountable to the electorate through elections of governing board members every two years. FAR caps in the General Plan could duplicate existing oversight mechanisms and may limit the ability of future governing bodies to respond to changing community needs. Speaking of elections, BCHD's Measure BC ($30M to prepare the campus for redevelopment and build the 91% non-resident service territory ALLCOVE building) was soundly rejected in November of 2024. It was the ONLY revenue measure rejected. It failed to garner a

simple majority as $600M+ of other bond measures passed by 2/3rds votes. **BCHD DOES NOT HAVE VOTER SUPPORT FOR ITS OVERDEVELOPMENT SCHEME. In fact, voters wouldn't even approved PREPARATION for the BCHD DEVELOPMENT SCHEME.**

If the City Council nonetheless chooses to proceed with a FAR cap for public institutional use, BCHD respectfully requests that it be consistent with the FAR applied to City Hall, the City's other large public institutional property. In the Fall of 2024, the City adopted an addendum to the Environmental Impact Report (EIR) concluding that maintaining the same FAR level (1.25) for these large public institutional properties would result in no significant environmental impacts. In light of that environmental review, applying a lower FAR standard in the General Plan to BCHD would raise concerns regarding internal consistency within the General Plan and give the appearance of targeting a specific property. **The City has no need for increased FAR caps at this time.** All Public land uses **should be capped at the maximum of their existing FAR or 0.5 to 0.75 FAR.**

As the City of Redondo Beach considers these issues, BCHD looks forward to continued collaboration with the City as it plans for the future. Our shared goal is to ensure that public institutions remain able to meet the community's needs both today and in the years ahead.

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StopBCHD.com (StopBCHD@gmail.com) is a Neighborhood Quality-of-Life Community concerned about the quality-of-life, health, and economic damages that BCHDs 110-foot above the street, 800,000 sqft commercial development will inflict for the next 50-100 years. Our neighborhoods have been burdened since 1960 by the failed South Bay Hospital project and have not received the benefit of the voter-approved acute care public hospital since 1984.Yet we still suffer 100% of the damages and we will suffer 100% of the damages of BCHDs proposal.
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Darryl Boyd - Broker/Owner, MRP, SFR, CPTS
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Expert Witness - Probate & Trust Valuation Disputes
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DARRYL B. BOYD, BROKER
811 N. Catalina Ave. Suite #2016
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CA DRE #01178871



From:	Carl Paquette
To:	Joy Ford; CityClerk; cityclerk@manhattanbeach.gov; cityclerk@hermosabeach.gov; James Light; Paige Kaluderovic; Mike Witzansky; Scott Behrendt; Chadwick B. Castle; Brad Waller
Subject:	Fwd: (FORWARD THIS EMAIL TO THE COUNCIL) Public Comment: Redline of BCHD Incorrect Statements in Bakaly Letter to RB City Council
Date:	Tuesday, January 20, 2026 12:49:14 PM

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

Begin forwarded message:

From: Stop BCHD <stop.bchd@gmail.com>
Subject: (FORWARD THIS EMAIL TO THE COUNCIL) Public Comment: Redline of BCHD Incorrect Statements in Bakaly Letter to RB City Council
Date: January 19, 2026 at 7:00:00 PM PST
To: Stop BCHD <stop.bchd@gmail.com>

<joy.ford@redondo.org>, <cityclerk@redondo.org>, <cityclerk@manhattanbeach.gov>, <cityclerk@hermosabeach.gov>, James Light <james.light@redondo.org>, Paige Kaluderovic <paige.kaluderovic@redondo.org>, <Mike.Witzansky@redondo.org>, <scott.behrendt@redondo.org>, <chadwick.castle@redondo.org>, <brad.waller@redondo.org>

From:	Mark Nelson (Home Gmail)
To:	Joy Ford; CityClerk; cityclerk@manhattanbeach.gov; cityclerk@hermosabeach.gov; James Light; Paige Kaluderovic; Mike Witzansky; Scott Behrendt; Chadwick B. Castle; Brad Waller
Subject:	I SUPPORT passage of Agenda Item N1 - BCHD to a 0.5 or 0.75 FAR ONLY. BCHD's planned OVERDEVELOPMENT with 100% Private Developers should not be SUPERSIZED. Passage is required because BCHD cannot be trusted to self-limit its 100% PRIVATE DEVELOPERS.
Date:	Monday, January 19, 2026 5:13:58 PM

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

I SUPPORT passage of Agenda Item N1 - BCHD to a 0.5 or 0.75 FAR ONLY. BCHD's planned OVERDEVELOPMENT with 100% Private Developers should not be SUPERSIZED. Passage is required because BCHD cannot be trusted to self-limit its 100% PRIVATE DEVELOPERS.

BCHD has a history of lying to the public.

At the October 1, 2024 RB Council Meeting, BCHD Board Member Poster made the ABSOLUTELY FALSE STATEMENT TO THE COUNCIL "your own lawyers had to remind them during a public meeting and on the record to stop targeting BCHD in their remarks." RB Planning Commissioners came to the Council and demonstrated with TRANSCRIPTS that Poster lied to the City Council.

In a July 2025 ER News interview, CEO Bakaly claimed that the 4-story hospital was 60-feet tall. The Board has previously CERTIFIED to the STATE that the 4-story hospital is only 51.5-feet tall at the top of its parapet (the wall around the roof of the building) so that actual roof is under 50-feet, NOT 60-FEET.

Untruthful statements are made to the Council and the Public from the HIGHEST LEVELS OF BCHD. In fact, BCHD letter to the Council contains a variety of misleading statements as demonstrated below.

DO NOT ALLOW BCHD TO DESTROY OUR NEIGHBORHOODS WITH SUPERSIZED PRIVATE DEVELOPMENT TO SERVICE 80% OR MORE NON-RESIDENTS WHILE DAMAGES ARE ALL LOCAL!

REDLINE OF BCHD'S FALSE CLAIMS TO THE CITY OF REDONDO BEACH

From: Abbes Khani
To: CityClerk
Subject: In Support of Planing Commission's Recommendations 0.5 FAR
Date: Monday, January 19, 2026 7:41:54 PM

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

I support the Planning Commission's recommendation for 0.5 FAR for P/I land use in order to be compatible with surrounding residential and light commercial land uses. An increase to 1.25 FAR for P/I land use would be highly damaging to the character and quality of life of the City.

City of Redondo Beach Council should not Intimidated or influenced by BCHD board members, specifically, Vanessa Poster and its conniving and liar CEO Tom Bakaly. These two characters have been falsely claiming that BCHD buildings are in need of seismic renovation and since that is costly, therefore, they have to be replaced with new buildings four times the size of existing floor footage. They are trying to force Redondo Beach Planning Commission and City Council to abandon the governing rules of urban developments and are asking for 1.25 FAR which is 2.5 times larger than Commissioner's recommendations.

I am begging Redondo Beach City Council to adheres to the .5 FAR, as recommended by Planning Commissioner.

Respectfully,

Abbes G Khani

BCHD Beach Cities Health District
A Public Agency

Live Well. Health Matters.

January 20, 2026

Mayor and City Council:

On behalf of Beach Cities Health District ("BCHD"), we are submitting, for background and context, the enclosed letter dated September 30, 2024, which was previously provided to the City Council in advance of its October 1, 2024 meeting. This correspondence relates directly to Agenda Item N.1 on the City Council's January 20, 2026 agenda, entitled "Discussion and Possible Action on the General Plan–Land Use Element Update with a Focus on the Building Intensity (Floor Area Ratio) Limits for the Public/Institutional (PI) and 'Other' Non-Residential General Plan Land Use Designations," including the FAR applicable to the BCHD campus.

Given the passage of time since the Council last considered this issue, and recognizing that the Council and Planning Commission now include new members who were not involved in the 2024 deliberations, BCHD believed it would be helpful to provide this prior correspondence to assist the Council's review and to provide continuity and context as deliberations resume. The enclosed letter also reflects the procedural history and considerations that informed earlier Council direction.

BCHD appreciates the City Council's continued consideration of this matter and respectfully submits this correspondence to ensure a complete and informed record.

In Health,

Tom Bakaly
Chief Executive Officer
Beach Cities Health District

RUTAN
RUTAN & TUCKER, LLP

Joseph D. Larsen
Direct Dial: (714) 641-3418
E-mail: jlarsen@rutan.com

September 30, 2024

VIA E-MAIL

Mayor and City Council
City of Redondo Beach
Attn: Mike Witzansky
415 Diamond Street
Redondo Beach, California 90277

Email: Mike.Witzansky@redondo.org
GeneralPlanEIR@redondo.org

Re: Comments on Agenda Item for October 1, 2024 Meeting: Updates to General Plan Elements

Dear Mayor and City Council:

We are writing to provide comments on the agenda item scheduled for the upcoming meeting on October 1, 2024, titled "Public Hearing to Consider, Discuss, and Receive Public Input on Updates to Five General Plan Elements (Land Use, Open Space & Conservation, Noise, and Safety), Associated Amendments to the City's Zoning Ordinances and Local Coastal Program, and Certification of the Environmental Impact Report Procedures."

We are writing on behalf of Beach Cities Health District ("BCHD"), a public agency that provides a wide range of preventive health services to South Bay residents, including those in the City of Redondo Beach (the "City"). BCHD is concerned about that portion of the City's proposed update to its General Plan Land Use Element that would affect BCHD's 9.7-acre campus at 514 North Prospect Avenue (the "Campus").

The Campus is currently improved with medical offices, community wellness and memory care facilities, a maintenance building, and a parking structure. The Campus has a public or institutional (P) land use designation in the City's General Plan and is zoned as a community facility ("P-CF") under the City's zoning code. Currently, there is no specified maximum Floor Area Ratio ("FAR") for P-CF zoned parcels. Instead, the carefully crafted language of the existing General Plan allows for flexibility in terms of use by subjecting development to discretionary design review. (Redondo Muni Code § 10-2.1116.)

However, without any cogent explanation or rationale, the Planning Commission has recommended a maximum FAR on the Campus at 0.50. This is extremely troubling because, if adopted, it would make the existing improvements on the Campus nonconforming and virtually eliminate the possibility of modernizing BCHD's outdated and seismically deficient Campus.

The building on the Campus was originally constructed in 1958 and, because of its age and seismic deficiencies, must be replaced. Indeed, a seismic retrofit of the Campus is economically unfeasible. Moreover, due to their age, the Campus' existing buildings require substantial annual maintenance and, within the near future, BCHD's annual maintenance costs for the Campus are expected to exceed its annual operational revenues. If prolonged, this operational deficit will lead to a reduction in BCHD programs and may ultimately lead to insolvency. As a result, BCHD is in the process of modernizing the Campus in a way that will more efficiently connect City residents with health and wellness services, programs, and facilities. Since 2017, BCHD has engaged in public outreach to plan and design its Campus. The proposed modernization includes a residential care facility for the elderly (which will consist of memory care and assisted living units), space for a program for all-inclusive care for the elderly, community services, and a youth wellness center. More information is available online at https://www.bchdcampus.org/faq.

Originally, a FAR of 1.25 was proposed for all public land use areas, including the Campus, consistent with the current 1.25 FAR for the Civic Center and P-CIV zoned properties, as set forth in Redondo Beach Municipal Code section 10-2.1112(a). However, at the City Council meeting on May 18, 2021, a 0.75 FAR was proposed for the Campus, while the proposed 1.25 FAR remained for other City-owned/controlled properties.[1] It is important to note that, except for Councilmember Nils Nehrenheim – who proposed the reduction – it is unclear whether the City Council members fully understood the impact this would have on the BCHD Campus when it was discussed. At the last meeting of the General Plan Advisory Committee (GPAC), many members expressed concerns that the impacts of that proposal were not adequately discussed. When the proposal advanced to the Planning Commission, many of the objections raised in this letter were also presented to the Commission with regards to the proposed 0.75 FAR.[2]

Despite these objections, the Planning Commission has proposed to *further* reduce the FAR to 0.5, while carving out additional exceptions for fire stations and police properties. Planning Commissioner Gale Hazeltine, who initially proposed the 0.50 FAR reduction, expressly said at the September 19, 2024 Planning Commission meeting that the 0.50 FAR was an "arbitrary number." This decision effectively renders the BCHD Campus as the only property of its size and use subject to the 0.5 FAR, which is both inequitable and detrimental to the BCHD's ability to serve the community effectively. Upon adoption, the proposed FAR would completely undermine the viability of BCHD's revitalization of the Campus and thereby seriously compromise its ability to continue its mission of providing necessary public services, including preventative health care to the City and surrounding community. Without modernization in the coming years, BCHD will be unable to function at the Campus – resulting in a loss of necessary public health services to the Beach Cities area.

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1 The discussion on this issue begins at 5:27:12 in the meeting recording.

2 The July 15, 2024 letter to the Planning Commission is attached hereto and incorporated herein by this reference.

Based on numerous public statements made by commissioners, it is evident that the Planning Commission's action was driven by personal animus toward BCHD and the proposed modernization of the Campus. The Commission's actions obstruct the Campus modernization project through the back door, without procedural due process or a fair administrative hearing. In particular, BCHD previously submitted a letter dated July 15, 2024,[3] objecting to Commissioner Sheila Lamb's participation in the General Plan Advisory Committee ("GPAC") and Planning Commission proceedings concerning the BCHD Campus. BCHD raised concerns regarding Commissioner Lamb's long-standing and highly public opposition to the Campus project, which has been marked by vehement statements and actions that reflect an intent to block the Campus' modernization at all costs. Of specific concern is her involvement in shaping the proposed FAR that directly undermines BCHD's modernization efforts and lacks any legitimate planning objectives. Despite these objections, Commissioner Lamb participated in the General Plan update process, compromising the fairness and transparency of the proceedings. BCHD's objection letter, dated July 15, 2024 (attached hereto and incorporated by reference), thoroughly documents Commissioner Lamb's history of public attacks on BCHD and the Campus modernization project.

This pattern of conduct is not limited to Commissioner Lamb. Commissioners Rob Gaddis and Wayne Craig have also publicly expressed opposition to the project in various forums.[4] Specifically, in public comments to the BCHD Board at its meeting on or about June 17, 2020, Commissioner Gaddis voiced his ardent opposition to the Campus project. Commissioner Craig, through social media posts and comments on the Easy Reader News website, launched disparaging attacks on BCHD and the project, using inflammatory language, including referring to the Campus as "the Wealthy Dying Center." These public comments underscore that the Planning Commission's proposed FAR was driven by personal animosity toward BCHD and the Campus and not any legitimate planning objective, with the sole intent of defeating the Campus project through the back door, without procedural due process or a fair administrative hearing on the specific project itself.

Notably, the proposed maximum FAR is not consistently applied to all properties with a public or institutional (P) land use designation in the General Plan. For example, properties within the City's civic center, the City-owned/controlled property at the northeast corner of Pacific Coast Highway and Vincent Street, and fire and police properties have a proposed maximum FAR of

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[3] BCHD's July 15, 2024 letter to the City Attorney regarding Commissioner Lamb is attached hereto and incorporated herein by this reference. Notably, Commissioner Hazeltine repeatedly acknowledged at the Planning Commissioner meetings (August 1, 2024 and September 19, 2024) that she had ongoing *ex parte* communications with Commissioner Lamb regarding the proposed General Plan update. Given Commissioner Lamb's long-standing and highly public opposition to the Campus project and Commissioner Haseltine's acknowledged "arbitrary" FAR proposal, there is no question that these *ex parte* communications further compromised the fairness and transparency of the proceedings.

[4] Samples of their public opposition is attached to this correspondence.

1.25.[5] However, other properties with a public or institutional (P) land use designation, including the Campus and school sites within the City, have a maximum FAR of 0.50. It is important to note, however, that school sites have a different use and zone designation – school facilities (P-SF) – and may be exempt from local land use regulations under the Government Code. Moreover, schools and health facilities serve distinct purposes, leading to different spatial requirements. Schools need space to accommodate playgrounds, sports fields, and outdoor learning environments, which are essential for children's physical and social development. In contrast, health and medical facilities prioritize spaces for patient care, medical equipment, and administrative functions. While they may include some outdoor areas for patient relaxation and rehabilitation, the primary focus is on providing controlled environments for health treatments and procedures. Thus, the design and spatial needs of schools and health facilities reflect their unique roles in supporting education and healthcare, respectively.

The Planning Commission's attempt to equate the two uses for spatial and FAR requirements was arbitrary and capricious, failing to recognize the fundamentally different needs and functions of these uses. Indeed, the land use on the Campus is similar to the City's Civic Center. The FAR Comparison Analysis provided by City staff to the Planning Commission for its September 19, 2024 meeting illustrates this point. It identifies a current FAR of 0.87 for the Civic Center and 0.77 for the Campus. The discrepancy between the Planning Commission's treatment of the Campus and the Civic Center despite having similar FAR highlights the arbitrary and discriminatory nature of the proposed FAR restrictions on the Campus. BCHD's Campus is essentially the *only* property of its size and use affected by the proposed 0.50 limitation.

For the reasons set forth herein, BCHD respectfully requests that the City eliminate the proposed maximum FAR of 0.50 for the Campus and make the minimum FAR a uniform 1.25 across all properties with a public or institutional (P) land use designation in the General Plan and zoned P-CF or P-CIV.

A. THE PROPOSED FAR REQUIREMENTS FOR PROPERTIES WITH A PUBLIC OR INSTITUTIONAL (P) LAND USE DESIGNATION VIOLATE GOVERNMENT CODE § 65852.

The proposed FAR requirements violate the uniformity requirements of the Planning & Zoning Law. As required under Section 65852 of the Government Code, with regards to zoning districts: "All such regulations shall be uniform for each class or kind of building or use of land throughout each zone, but the regulation in one type of zone may differ from those in other types of zones." In *Neighbors in Support of Appropriate Land Use v. Tuolumne County* (2007), the

[5] According to Commissioner Wayne Craig at the September 19, 2024 Planning Commission meeting, the City does not want to "tie its hands" with its ability to use those properties, especially in light of the pending $93.3 million bond measure (Measure FP) aimed at modernizing the city's fire and police stations. However, it is clear that the City intends to "tie [BCHD's] hands" with regards to modernizing the Campus.

courts held that "the foundations of zoning would be undermined. . .if local governments could grant favored treatment to some owners on a purely ad hoc basis. Cities and counties unquestionably have the power to rezone and their decisions to do so are entitled to great deference; but rezoning, even of the smallest parcels, still necessarily respects the principle of uniformity. This is because a rezoning places a parcel within a general category of parcels (those in the new zone), all of which are subject to the same zoning regulations. The county's action in this case, by contrast, placed the [landowner's] land in a class by itself."

Similarly, there appears to be one parcel of its size with a public or institutional (P) land use designation and P-CF or P-CIV zoning designation subject to this proposed maximum FAR of 0.50 – the Campus. Why? Because the other similarly situated and sized properties in the City with a public or institutional (P) land use designation and P-CF or P-CIV zoning designation are owned and controlled by the City, for which there is a different maximum FAR of 1.25.[6] In essence, the City is seeking to establish a parcel-specific land-use restriction that limits the Campus to a unique 0.50 FAR not shared by its own public or institutional (P) designated properties of a similar size and use.

B. THE PROPOSED MAXIMUM FAR OF 0.50 VIOLATES BCHD'S RIGHTS TO DUE PROCESS.

The Due Process Clause of the Fourteenth Amendment to the United States Constitution prohibits a state from depriving a person of life, liberty, or property without due process of law. (*See also* Cal. Con., art. I, sec. 7.) The touchstone of substantive due process is the protection of the individual against arbitrary government action; the due process clause was intended to prevent government officials from abusing their power or employing it as an instrument of oppression. (*Wolff v. McDonnell*, 418 U.S. 539, 558 (1974); *Collins v. City of Harker Heights* (1992) 503 U.S. 115, 126.) A violation of substantive due process rights occurs if a government agency's actions are (1) irrational or arbitrary or (2) not rationally related to a legitimate government interest. (*Village of Euclid v. Ambler Realty Co.* (1926) 272 U.S. 365; *Lingle v. Chevron* (2005) 544 U.S. 528.) The test is disjunctive. Thus, a property owner need only demonstrate facts to support one of the two bases to state a viable due process claim.

If the City were to adopt the proposed 0.50 FAR for the Campus, its actions would be arbitrary and irrational and would constitute an abuse of power, subjecting it to liability under the Due Process Clause. In *Arnel Development Co. v. City of Costa Mesa* (1981) 126 Cal.App.3d 330, 337, the court ruled that the enactment of an initiative measure downzoning property was arbitrary and discriminatory where enacted without considering appropriate planning criteria and for the sole and specific purpose of defeating a single development. (*See also Fry v City of Hayward*

[6] The school properties that have a public or institutional land use designation are not similarly situated. They are zoned P-SF and, for school-related purposes, generally provide for large open park areas. Regardless, unlike the Campus, school properties may be exempted from local land use regulations (Gov. Code 53094(b)) and the proposed 0.50 FAR maximum.

(N.D. Cal. 1988) 701 F.Supp. 179 [zoning restrictions applicable to just one of several open space areas in City invalidated for denial of equal protection], *Del Monte Dunes, Ltd. v. City of Monterey* (9th Cir. 1990) 920 F.2d 1496, 1508 [allegations that city council approved a 190 unit project with conditions that had been substantially met, then same council members abruptly changed course and rejected the project motivated not by legitimate regulatory concerns, but by political pressure from neighbors to preserve property as open space, could constitute arbitrary and irrational conduct] and *Herrington v. County of Sonoma* (9th Cir. 1987) 834 F.2d 1488 [denial of subdivision and subsequent downzoning of property violated property owner's due process rights given evidence that county's general plan/subdivision inconsistency determination was irrational and arbitrary and aimed at defeating particular development project].)

Here, if the City were to adopt the proposed 0.50 for the Campus, it would be engaging in the same conduct that the court invalidated in the *Arnel* and *Fry* cases. Specifically, approval of the proposed 0.50 FAR would constitute irrational and arbitrary conduct not based on appropriate planning criteria and for the sole and specific purpose of defeating the proposed modernization of the Campus. Indeed, the very Commissioner who proposed the 0.50 FAR even described it as "arbitrary." And the numerous public statements made by Commissioners reveal that the Planning Commission's proposed FAR was a back-door attempt to defeat the Campus project and was not supported by legitimate planning objectives.

A planning regulation cannot be aimed at or discriminate against a particular property owner or applicant. (*See, e.g.*, *G&D Holland Construction Co. v. City of Marysville* (1970) 12 Cal. App.3d 989, 994 [when the police power has been exercised in such a manner as to oppress or discriminate against an individual or individuals or a particular parcel of land, it will be overturned]; *see also Lockary v. Kayfetz* (9th Cir. 1990) 917 F.2d 1150, 1155-1156 [if agency's moratorium on the issuance of new water hookups based on a water shortage was pre-textual, as alleged, owners could state viable substantive due process and equal protection claims].) Based on a review of the Planning Commission's hearings on the General Plan update, it is clear that the proposed 0.50 FAR is plainly and unmistakably aimed at blocking the redevelopment of the Campus. Indeed, virtually all of the public discussion surrounding the proposed General Plan update revolved around the FAR proposed for the Campus, with the intent of defeating its modernization. Because the proposed 0.50 FAR is an arbitrary and discriminatory action aimed at BCHD, it is not reasonably related to a legitimate state interest. (See, e.g., *Lockary*, *supra*, 917 F.2d at 1155 [court observes that the reasonable relationship test "will not sustain conduct by state officials that is malicious, irrational or plainly arbitrary"].)

In sum, enactment of the proposed 0.50 FAR, which subjects the Campus to different or more burdensome requirements than imposed on similarly situated properties (*i.e.*, the City's civic center), would deprive BCHD of its constitutionally protected right to due process.

C. ADOPTION OF THE PROPOSED 0.50 FOR THE CAMPUS WOULD VIOLATE BCHD'S RIGHT TO EQUAL PROTECTION.

The Fourteenth Amendment to the United States Constitution provides that no state shall deny to any person within its jurisdiction the equal protection of the laws. (*See also* Cal. Con., art. I, sec. 7.) The concept of equal protection has been defined to mean that no person or class of persons may be denied the same protection of law that is enjoyed by other persons or other classes in like circumstances. (*Hawn v. County of Ventura* (1977) 73 Cal.App.3d 1009, 1018.) A claimant must show that the state "has adopted a classification that affects two or more *similarly situated* groups in an unequal manner." (*Walgreen Co. v. City & County of San Francisco* (2010) 185 Cal.App.4th 424, 434 [emphasis in the original].) An equal protection challenge to a regulation that does not involve a suspect class or fundamental right must nevertheless bear a reasonable relationship to a legitimate state interest. (*Young v. American Mini Theaters* (1976) 427 U.S. 50.) "[A] deliberate, irrational discrimination, even if it is against one person (or other entity) rather than a group, is actionable under the equal protection clause." (*World Outreach Conference Center v. City of Chicago* (7th Cir. 2009) 591 F.3d 531, 538.)

The term spot zoning is used to describe a zoning action that violates the principle of equal protection because of its discriminatory nature. (*See, e.g., Ross v. City of Yorba Linda* (1991) 1 Cal. App.4th 954 [denial of rezoning to allow property owner to develop their property at densities similar to those on surrounding parcels, was arbitrary and discriminatory and thus unlawful]; and *Kissinger v. City of Los Angeles*, 161 Cal.App.2d 454, 460 (1958) [downzoning of an island surrounded by multi-family residential and commercial uses to single-family use found to be improper].)

Here, the Campus is designated for public use by the General Plan. The only other parcels of comparable size in the City that are likewise improved or designated for similar uses are City-owned properties. However, the proposed General Plan update carves out an exemption to the proposed 0.50 FAR for those City-owned properties. As in *Ross*, "the City's arbitrary line-drawing is antithetical to the individual right to equal protection of the law." (1 Cal.App.4th at 962.) Enactment of the proposed 0.50 for the Campus would thus constitute arbitrary and discriminatory spot zoning in violation of BCHD's right to equal protection.[7]

Considering the foregoing, enactment of the proposed 0.50 for the Campus, which subjects the Campus to different or more burdensome requirements than imposed on similarly situated properties, would deprive BCHD of its constitutionally protected right to equal protection under the law.

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[7] In an apparent recognition that what was being proposed was "spot zoning," Commissioner Wayne Craig asked City staff in the September 19, 2024 Planning Commission meeting to confirm his belief that spot zoning is permissible, based upon his internet search on that topic.

D. THE PROPOSED FAR LACKS CEQA REVIEW, AND THE CITY MUST PAUSE THE PROCESS UNTIL A STABLE PROJECT DESCRIPTION IS PROVIDED.

The introduction of this 0.5 FAR, which was proposed after the close of the public comment period on the Draft Program Environmental Impact Report ("DPEIR"), represents a significant change to the defined project.[8] Importantly, this change was not subject to proper environmental review under the California Environmental Quality Act ("CEQA), nor has the public had the opportunity to provide input on these revisions. These changes must be reviewed under CEQA and the public must be given the opportunity to comment on changes to the Project. (See *Save Our Capitol! v Department of Gen. Servs.* (2023) 87 Cal.App.5th 655, 676.) To date, this has not occurred in relation to the proposed 0.5 FAR. This ongoing series of revisions indicates that the General Plan Update remains in development, which makes it premature for the City to proceed with CEQA review at this stage.

These "shifting sands" in the project description create confusion and undermine the integrity of the environmental review process. As noted in *County of Inyo v. City of Los Angeles* (1997) 71 Cal. App. 3d 185, when an EIR contains an unstable or shifting project description, meaningful public participation is hindered. Furthermore, a lead agency's failure to provide a stable and consistent project description constitutes a prejudicial abuse of discretion under CEQA, as it prevents the EIR from serving as a reliable basis for informed decision-making on proposed discretionary actions.

At this point, the General Plan Update is not yet fully defined. Given this lack of a stable project description, it would be improper for the City to continue moving forward with the CEQA review process. A halt in the CEQA process is necessary to ensure that the DPEIR can accurately and thoroughly assess the potential environmental impacts of the General Plan Update. Only once a complete and stable project description is available can the public and decision-makers fully understand and provide meaningful input on the proposed project's impacts. BCHD respectfully requests that the City pause its CEQA review of the General Plan Update until the project description is fully defined, and the proposed changes—including the 0.5 FAR—have undergone proper environmental review with an opportunity for public comment. This is the only way to ensure that the General Plan Update complies with CEQA and that the public's right to participate in the process is protected.

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[8] Notably, there were other significant changes to the proposed General Plan Update made by the Planning Commission that were not analyzed in the DPEIR, including changes to multiple Goals, Policies, and Implementation Measures within the Land Use and Open Space and Conservation Elements of the General Plan Update the DPIR must be revised to assess the impacts of these changes to the Project and the public must be allowed to comment on them. (See *Save Our Capitol! v Department of Gen. Servs.* (2023) 87 Cal.App.5th 655, 676.).

E. THE PROPOSED MAXIMUM FAR OF 0.50 ON THE CAMPUS WILL RESULT IN THE LOSS OF PUBLIC SERVICES, CONFLICTING WITH THE DPEIR'S ASSUMPTIONS; THE CITY MUST RECONSIDER OR JUSTIFY THE LOSS WITH CLEAR EVIDENCE.

BCHD serves as a vital hub for public services, offering preventative health care, educational programs, community events, and outreach initiatives. These activities contribute significantly to the well-being of the community. Restricting BCHD's ability to replace outdated and seismically deficient buildings on the Campus would inevitably result in a loss of space and resources needed to deliver these essential services, significantly diminishing the overall quality of life in the area. There is no justification or rationale for imposing the proposed FAR on BCHD's Campus, particularly when other properties with the same land use designation are permitted a higher FAR of 1.25.

The DPEIR for the General Plan update outlines a buildout scenario for the Campus that exceeds the Planning Commission's proposed FAR limit. In fact, in the DPEIR, a buildout scenario is presented that assumes a higher FAR for the Campus, based on BCHD's Healthy Living Campus Master Plan. This is inconsistent with the Planning Commission's recommendation of a maximum 0.50 FAR for the Campus, creating a disconnect between the project assumptions in the DPEIR and the proposed limits of the General Plan update. This discrepancy results in the DPEIR analyzing the impacts of a buildout scenario that is not permissible under the proposed General Plan, rendering the analysis incomplete and inaccurate.

This inconsistency has significant implications. By analyzing a buildout scenario that exceeds the proposed FAR limit, the DPEIR fails to assess the true environmental impacts of the General Plan update as it relates to the Campus. Furthermore, the proposed 0.50 FAR would prevent BCHD from fully modernizing its Campus, which is necessary to continue providing essential public health services, including assisted living and memory care. Without the ability to proceed with the planned development, BCHD's capacity to serve the surrounding community will be compromised, leading to a loss of vital services for the elderly and disabled.

The City Council must review this discrepancy and consider a FAR that aligns with BCHD's operational needs, such as the 1.25 FAR proposed for other PI land use designations, which would better accommodate BCHD's Healthy Living Campus Master Plan. Alternatively, if the City moves forward with the 0.50 FAR, it should be accompanied by a detailed and evidence-based explanation, clearly outlining the rationale for this limitation and assessing the impacts of restricting essential public services.

The DPEIR and the General Plan update should be revised to provide a coherent and accurate project description that aligns with the proposed FAR limits, ensuring that all potentially significant environmental impacts are properly analyzed. Without this, the analysis is fundamentally flawed, and the public, as well as decision-makers, are deprived of the necessary information to make informed decisions regarding the future of the BCHD Campus and its ability

to provide critical services. These issues are more fully addressed in BCHD's September 11, 2024 comment letter to the DPEIR, which is attached thereto and incorporated herein by this reference.

F. THE PROPOSED FAR OF 0.50 IS INCONSISTENT WITH THE POLICIES OUTLINED IN THE DRAFT GENERAL PLAN.

The proposed maximum FAR of 0.50 in the draft General Plan update for the Campus is too restrictive and inconsistent with the policies and goals of the General Plan, especially regarding public and institutional uses, health and land use, and health partnerships.

The Campus aims to provide a hub of well-being that serves and connects Beach Cities residents of all ages with abundant health and wellness services, programs, and facilities. The proposed FAR of 0.50 would severely constrain the modernization of the aging and deficient Campus and prevent BCHD from achieving its vision and mission. Moreover, this FAR is inconsistent with the following policies identified in the draft General Plan:

- Policy LU-1.13: Public and Institutional Uses. This policy states that the City should "Provide for the continuation of existing and expansion of governmental administrative and capital facilities, schools, libraries, hospitals and associated medical offices, public cultural facilities, and other public uses, ancillary parks, recreation and open spaces and other public land uses and facilities to support the existing and future population and development of the City" (pg. 2-18). The Campus is a public and institutional use that provides health and wellness services and facilities to the community, and it must be allowed to be modernized to accommodate the growing and changing needs of the Beach Cities residents. The proposed FAR of 0.50 would effectively eliminate these health and wellness services.

- Policy LU-4.2: Health and Land Use. This policy states that the City should "Seek to incorporate health considerations into land use planning" (pg. 2-20). The Campus is a project that exemplifies this policy by creating a hub that promotes health and well-being for all generations. The proposed FAR of 0.50 would undermine this policy by restricting the floor area that can be allocated for health-related programs and facilities, such as the youth wellness center, a program for all-inclusive care for the elderly (PACE), a community wellness pavilion, and an aquatics center.

- Policy LU-4.7: Health Partnerships. This policy states that the City should "Build and maintain partnerships with the [sic][9], health care providers, health promoting

[9] This grammatical error arose from the deliberate deletion of a reference to BCHD, as requested by Commissioner Lamb. Her effort to erase all mentions of BCHD from the Land Use Element of the General Plan, while other public agencies like the Redondo Beach Unified School District and

non-profits and community-based organizations to evaluate and implement land use projects in a manner that improves community health" (pg. 2-21). The Campus is a project that reflects this policy by partnering with BCHD, a public agency that provides a wide range of preventive health services to South Bay residents, including those in the City. The proposed FAR of 0.50 would run contrary to this policy by limiting the Campus' ability to efficiently connect City residents with health and wellness services, programs, and facilities. By proposing this restrictive FAR, the City is essentially dismantling and disregarding any partnership it has with BCHD to accomplish the goal of promoting health in the City.

Therefore, we urge the Planning Commission to reconsider the proposed FAR of 0.50 for the Campus and to adopt a uniform FAR of 1.25 across all properties with a public or institutional (P) land use designation in the General Plan and zoned P-CF or P-CIV. That would be more in line with the policies and goals of the General Plan, and that would allow the Campus to fulfill its vision and mission of providing a hub of well-being for the Beach Cities residents.

G. BY LIMITING THE ABILITY TO PROVIDE ONGOING RESIDENTIAL CARE FOR THE CITY'S ELDERLY COMMUNITY, THE PROPOSED FAR OF 0.50 IS INCONSISTENT WITH THE CITY'S HOUSING ELEMENT.

The Campus is important in providing assisted living options for seniors in the City. The City's 6th Cycle 2021-2029 Housing Element acknowledges that elderly residents and individuals with disabilities have unique housing needs. (Housing Element, pg. 28.) In the City, disabled individuals make up 6.5% of the population, with 45% of them being aged sixty-five (65) and older. (*Ibid.*) Independent living difficulties are common among these elderly residents. (Housing Element, Table H-18.) However, housing options for persons with disabilities, including community care facilities, are limited in the City. Indeed, the City only has six residential care facilities for the elderly, with a total capacity of 282 beds. (2021-2029 Housing Element, pg. 30.) One of these facilities is located on the Campus.

The need for suitable housing options for persons with disabilities, including community care facilities, is crucial. In fact, the staff report for the Campus' 2006 Conditional Use Permit to convert part of its full-service community center into an assisted living facility explicitly emphasizes the urgent need for a residential care facility to cater to elderly individuals who require living assistance while desiring to remain in the South Bay area. Further, the staff report for the Campus' 2010 Conditional Use Permit to expand the assisted living facility explicitly noted, "[g]iven the aging demographics of [the City's] population, it is not surprising that this facility is looking to expand and it is likely that more of these facilities will be needed in the near future."

LA Metro remain referenced, further underscores her clear animus toward BCHD. This selective exclusion is unjustified and discriminatory, revealing an intent to single out BCHD in a manner that is both unfair and inappropriate.

However, the proposed FAR of 0.50 for the Campus limits its ability to provide ongoing residential care for the City's elderly community, which goes against the City's commitment to addressing their specialized housing needs. Moreover, any refusal to make reasonable accommodations in rules, policies, or practices when such accommodation is necessary to afford disabled seniors equal opportunity to residential care would violate the federal Fair Housing Act (42 U.S.C. §§ 3601-3631) and/or California's Unruh Civil Rights Act.

H. THE PROPOSED MAXIMUM FAR OF 0.50 VIOLATES SENATE BILLS 330 AND 8 (HOUSING CRISIS ACT OF 2019).

Governor Gavin Newsom enacted the Housing Crisis Act of 2019 ("HCA"), also known as SB 330 (Chapter 654, Statutes of 2019), on October 9, 2019, as a response to the housing crisis in California. The provisions of the HCA were later extended through SB 8 (Chapter 161, Statutes of 2021), signed by Governor Newsom on September 16, 2021.

One aspect of the HCA involves limitations on making changes to land use or zoning that would reduce residential density or the intensity of land uses compared to what was allowed under the regulations in effect on January 1, 2018. The law includes various factors in its definition of "less intensive use," including reductions in FAR.

Currently, the Campus permits residential care facilities. In fact, the City has identified potential locations for such facilities on the BCHD Campus to ensure compliance with SB 330. However, the proposed 0.50 FAR, which imposes stricter limitations on the Campus beyond what was allowed on January 1, 2018, would make even the existing facilities nonconforming. This violates the HCA.

I. THE CITY FAILED TO PROVIDE BCHD WITH AN ADEQUATE OPPORTUNITY TO BE INVOLVED IN THE PREPARATION OF THE GENERAL PLAN UPDATE, AS REQUIRED BY GOV. CODE §§ 65351, 65352, BEFORE BEING SUBMITTED TO ENVIRONMENTAL REVIEW.

According to Government Code § 65351, the City is required to involve public agencies in the preparation of any amendment to the General Plan. Furthermore, Government Code § 65352 mandates that the City refer any proposed action to amend the General Plan to specified governmental entities, including any special district, such as BCHD, that may be significantly affected by the proposed amendment. Each of these governmental agencies must be given a minimum of 45 days to review and comment on the proposed amendment.

BCHD did not receive any notice of the General Plan update, including the proposed maximum FAR until being served with the Notice of Preparation of Draft EIR. By failing to involve BCHD in the process, the City allowed land use practices that will compromise BCHD's ability to continue its mission of providing necessary public services, including preventative health

care to the City and surrounding community, to be included in the proposed General Plan update that is being submitted for environmental review.

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In summary, given the numerous constitutional, statutory, and procedural infirmities associated with the proposed 0.50 for the Campus (as set forth above), we trust that the City will act appropriately and remove the maximum FAR for the Campus and, instead, leave the matter to the City's design review, as currently is the case. Alternatively, the City should ensure that a uniform maximum FAR of 1.25 is applied uniformly to all similarly situated properties with a public or institutional land use designation and zoned C-PF of C-CIV.

We appreciate your consideration of BCHD's views on this matter. In the meantime, please do not hesitate to contact me with any questions concerning this correspondence.

Very truly yours,

RUTAN & TUCKER, LLP

Joseph D. Larsen

JDL

cc:
Tom Bakaly, CEO, Beach Cities Health District (Tom.Bakaly@bchd.org)
Monica Suua, CFO, Beach Cities Health District (Monica.Suua@bchd.org)
Michael W. Webb, City Attorney, City of Redondo Beach (Michael.Webb@redondo.org)

ATTACHMENT “1”

Beach Cities Health District
BCHD
A Public Agency

Live Well. Health Matters.

September 11, 2024

VIA E-MAIL AND

MESSENGER

City of Redondo Beach
Community Development Department, Door 2
415 Diamond Street
Redondo Beach, California 90277
Attn: Marc Wiener, Community Development Director
Sean Scully, Planning Manager

Email: GeneralPlanEIR@redondo.org

Re: Beach Cities Health District's Comment on Draft Program EIR
Redondo Beach Focused General Plan Update, Zoning Ordinance Update, and Local Coastal Program Amendment
(State Clearing House No. 2023050732)

Dear Mr. Wiener and Mr. Scully:

I am writing on behalf of Beach Cities Health District ("BCHD"), a public agency that provides a wide range of preventive health services to South Bay residents, including those in the City of Redondo Beach (the "City"). BCHD appreciates this opportunity to submit comments on the Draft Program Environmental Impact Report ("DPEIR") prepared in connection with the Redondo Beach Focused General Plan Update, Zoning Ordinance Update, and Local Coastal Program Amendment ("Project" or "General Plan Update").

Initially, BCHD feels compelled to observe the volume and purported scope of the DPEIR – encompassing a main volume in excess of 700 pages, and nine appendices over 700 pages.[1] An extension of the review and comment period – currently set at nearly the bare minimum number of days – is warranted to facilitate a thorough, comprehensive, and meaningful reading and evaluation of the materials.

At the same time, it is readily evident from the limited review that has been possible under the given period, that the DPEIR fails to conform to the requirements of the California Environmental Quality Act ("CEQA") (Pub. Res. Code §§ 21000, et seq.), and the State of California Guidelines for CEQA (14 Cal. Code Regs §§15000 et seq.). The DPEIR is replete with several serious deficiencies that mandate correction before any consideration of the Project can take place. These deficiencies consist of both general and specific matters as further discussed

[1] The text of a draft EIR should ordinarily be less than 150 pages and, for projects of "unusual scope or complexity," should normally not exceed 300 pages. (14 Cal Code Regs §15141; see also Pub Res C §21003(b)–(c).)

below. Accordingly, BCHD requests that the City suspend any further consideration of the Project until the DPEIR can be revised and recirculated for public review and comment to fully disclose and analyze the potential impacts of the Project and fully consider feasible alternatives to the Project.

I. INTRODUCTION

CEQA calls for a thorough analysis of a project's potentially significant environmental impacts as well as feasible means to avoid or substantially lessen such impacts. To serve its important public purposes of informing the public and decision-makers of the consequences of its action, such a review must occur before approval of a project. Such review is particularly important where, as here, it is anticipated that the proposed Project will have substantial impacts on and conflict with the authorities of other public agencies.

As such, thorough identification of the proposed Project, and candid disclosure of all phases of the Project and its potential impacts, are essential to ensure that the proposed Project will be planned and implemented in conformity with established community plans and policies and that environmental review is conducted with full consideration of all potentially significant environmental impacts as well as mitigation measures and alternatives designed to address those impacts. In addition, it will be important to consider the impacts of the proposed Project on the BCHD's community, mission, facilities, and operations. The City must therefore provide a meaningful opportunity for informed public review of and comment on a well-defined "project."

While we recognize the effort that has gone into the preparation of the current DPEIR, it is apparent that the document does not provide the information, evidence, or analysis required under CEQA. The DPEIR thus fails to fulfill its critical role as mandated by CEQA in educating the public generally, other affected regulatory agencies and governments, or the officials and City Council, as to the potential environmental significance and impacts of the proposed Project.

The necessary contents for an adequate Draft EIR are described in Public Resources Code § 21100. A Draft EIR must include "a detailed statement setting forth all of the following:

(1) All significant effects on the environment of the proposed project.

(2) In a separate section:

(A) Any significant effects on the environment that cannot be avoided if the project is implemented.

(B) Any significant effect on the environment that would be irreversible if the project is implemented.

(3) Mitigation measures proposed to minimize the significant effects on the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy.

(4) Alternatives to the proposed project.

(5) The growth-inducing impacts of the proposed project."

Article 9 of the CEQA Guidelines further expands on the contents of Draft EIRs. Specifically, a Draft EIR must contain the information required by CEQA Guidelines sections 15122 through 15131. (CEQA Guidelines § 15120.) Those sections require, among others, adequate consideration and discussion of (1) the Project Description, (2) the Environmental Setting, (3) Significant Environmental Impacts, (4) Mitigation Measures, (5) Alternatives, and (6) Cumulative Impacts.

As outlined in more detail below, the DPEIR fails to, among others: contain an adequate project description; properly identify the environmental setting; adequately assess the Project's potentially significant environmental effects, including those that cannot be avoided; and identify feasible mitigation measures and alternatives to avoid or substantially lessen the Project's significant environmental effects. It is therefore respectfully urged that the DPEIR be revised, corrected, and recirculated for public review and comment before the City proceeds with any further action on the proposed Project.

In addition, BCHD requests and expects that responses to each comment, whether in this letter or the exhibits attached hereto, will be provided as required by and in accordance with CEQA Guidelines section 15088.

II. THE DPEIR FAILS TO COMPLY WITH CEQA.

A. The DPEIR Does Not Provide A Full And Accurate Description Of The Project.

1. Deficient Project Description—In General

The DPEIR does not provide a full and accurate description of the "Project" as required by CEQA. (*See, e.g.*, CEQA Guidelines § 15124; *Laurel Heights Improvement Ass'n v. Regents of the University of California* (1988) 47 Cal.3d 376.) This deficiency undermines the document's compliance with CEQA guidelines and its effectiveness in informing the public and decision-makers about the potential environmental impacts of the Project.

An EIR must comprehensively review the proposed project in its entirety, considering all phases from planning to development and operation. This requirement reflects CEQA's definition of a "project" as the "whole of an action" that may result in a direct or reasonably foreseeable indirect physical change in the environment (Public Resources Code § 21065; CEQA Guidelines § 15378). The DPEIR falls short in this regard, failing to provide a complete and stable project description, which is essential for fulfilling CEQA's "public awareness" mandate. Specifically, portions of the General Plan Update were revised by the City's Planning Commission and an

revised General Plan Update reflecting those changes to the Project have yet to be released for public review.

In addition to being accurate and complete, a project description must be stable. (CEQA Guidelines § 15124; *County of Inyo v. City of Los Angeles* (1997) 71 Cal. App. 3d 185, 197.) Despite this, at its August 1, 2024 Special Meeting, the Planning Commission reached a consensus on several proposed changes to multiple Goals, Policies, and Implementation Measures within the Land Use and Open Space and Conservation Elements of the General Plan Update.[2] Per the staff report at the Planning Commission's August 15, 2024 meeting, the changed version of the General Plan Update, incorporating the Planning Commission's proposed modifications, is not scheduled to become publicly available until the Planning Commission's September 19, 2024 public hearing on the Project[3] – which is after the public's deadline to respond to the DPEIR. The public must be given the opportunity to comment on changes to the Project. (See *Save Our Capitol! v Department of Gen. Servs.* (2023) 87 Cal.App.5th 655, 676.)

Notably, at the August 15 Planning Commission meeting, Commissioner Sheila Lamb revealed her intent to propose additional changes to the City's Zoning Code relating the zoning and land use designation of the Campus.[4] However, she did not specify the proposed changes at that time, intimating that she preferred to introduce these changes at the next Planning Commission meeting – after the public review period for the EIR has closed – so that they may be included without environmental review and subject to public review and comment. This approach raises concerns about transparency and the adequacy of public participation in the environmental review process.

These ongoing revisions indicate that the General Plan Update is still in development, making it premature for the City to proceed with CEQA review at this stage. Such "shifting sands" in the project description mislead the public and undermine the EIR process. As noted in *County of Inyo v. City of Los Angeles*, *supra*, when an EIR contains an unstable or shifting project description, meaningful public participation is hindered. The lead agency's failure to provide a stable and consistent project description constitutes a prejudicial abuse of discretion under CEQA

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[2] The URL to the video of the Planning Commission's proposed changes to the General Plan update is as follows: https://youtu.be/ph7ZtvCVwJE?t=9007.

[3] The URL to the referenced staff report is as follows: https://redondo.legistar.com/View.ashx?M=PA&ID=1207077&GUID=50B43972-9154-49AF-9FC9-EDCBBFA1A695. The referenced language can be found on page 77 of the agenda packet (page 2 of the staff report).

[4] The URL to the video of the comments made by Commissioner Lamb is as follows: https://youtu.be/eylAOQHWL5o?t=15353.

and precludes this EIR from serving as the environmental basis for the proposed discretionary actions.

Given that the Project is not yet completely defined, the City must pause the CEQA review process until a complete and stable project description is available. This will ensure that the DPEIR can accurately assess the potential environmental impacts of the General Plan Update, as required by CEQA, and that the public and decision-makers have the necessary information to provide meaningful input.

2. Specific Comments on "Project Description" Text

The following comments and questions refer to specific portions or pages of Chapter 5 of the DPEIR:

a. Pp. 3-23 to 3-25 – Inconsistencies in FAR Application and Inadequate General Plan Buildout

BCHD's 9.7-acre campus at 514 North Prospect Avenue (the "Campus") is designated as public/institutional (PI) land use in the Project. (DPEIR, p. 3-20, Figure 3-5.) The Project's proposed land uses for each designation are detailed in Table 3-2. Table 3-2 sets a new maximum Floor Area Ratio (FAR) of 0.75 for the Campus. However, the DPEIR describes a buildout scenario for the Campus that exceeds this proposed maximum FAR. Specifically, page 3-25 of the DPEIR outlines a buildout scenario for the Campus with a FAR of 0.85, surpassing the Project's maximum allowable FAR:[5]

> Growth for [BCHD] was projected consistent with the site development plan/ program for phases 1 and 2, as described in the project description of the 2021 certified Final Environmental Impact Report (SCH No. SCH Number 2019060258) in the buildout methodology for the General Plan Update, including the following assumptions (Phase 1: Assisted Living: 157 units (203,700 sf); Memory Care: 50,000 sf (120 beds); PACE: 14,000 sf; Community Services: 6,270 sf; Youth Wellness Center: 9,100 sf. Phase 2: Wellness Pavilion: 37,150 sf; Aquatics Center (indoor area): 24,000 sf; Center for Health and Fitness: 20,000 sf), resulting in a FAR of 0.85.

The analyzed buildout scenario in the DPEIR appears to be tied to BCHD's Healthy Living Campus Master Plan. However, the defined Project prevents that very buildout scenario for the

[5] A similar paragraph is found in the DPEIR's Appendix, p. A-17.

Campus. By analyzing a buildout scenario that exceeds the Project's maximum FAR for the Campus, the DPEIR assesses the impacts of something other than the actual Project. Consequently, it fails to evaluate the true environmental impacts of the Project itself. Further, the DPEIR lacks a clear explanation or rationale for applying a buildout scenario for the Campus that conflicts with the defined Project.

By not applying the Project's maximum FAR of 0.75 for the Campus in its buildout scenario, the DPEIR avoids addressing the likely loss of essential public services provided by BCHD at the Campus, such as healthcare services to the surrounding community and residential care facilities for the elderly and disabled. This omission leads to an incomplete analysis of the environmental impacts associated with the proposed General Plan Update, particularly regarding its effects on the BCHD and the community. All potentially significant environmental impacts related to the new maximum FAR of 0.75 for PI land use designations should have been analyzed but were not because it analyzed a buildout scenario for the Campus that the Project itself prohibits.

An accurate and complete project description is crucial for a proper evaluation of the potentially significant environmental impacts of the agency's actions. (*Silveira v. Las Gallinas Valley Sanitary Dist.* (1997) 54 Cal.App.4th 980, 990.) Only a precise project description allows affected parties and decision-makers to balance the proposal's benefits against its environmental costs, consider mitigation measures, and weigh alternatives. (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 192-193.)

The DPEIR erroneously redefines the scope of its analysis to a buildout scenario that is precluded by the defined Project, making it impossible for public agencies and concerned individuals to conduct an effective review or provide meaningful comments on the proposed Project. CEQA review cannot be adequately undertaken unless the City identifies a buildout scenario for the Project that reflects the true impacts of the proposed Project. The DPEIR must be revised to include a complete and accurate project description, incorporating all components of the Project, including the proposed FAR on PI in the buildout, to enable informed public and agency input.

The DPEIR fails to recognize, let alone analyze, all potentially significant environmental impacts of the proposed 0.75 FAR on PI land use designations. It must be revised to include a comprehensive analysis of both the direct and reasonably foreseeable indirect impacts of the proposed FAR. Alternatively, the scope of the DPEIR and General Plan Update must be expanded to include a detailed, evidence-based explanation justifying the buildout assumptions that exceed the Project's scope and limits. (CEQA Guidelines § 15125; *Communities for a Better Environment v. South Coast Air Quality Management District* (2010) 48 Cal.4th 310.)

b. Pp. 3-23 to 3-25 – Factual Inaccuracy in the DPEIR Regarding BCHD Healthy Living Campus FAR and Resulting Implications

The above-referenced paragraph on page 3-25 of the DPEIR also contains an inaccuracy regarding the FAR for the BCHD Healthy Living Campus. It outlines a buildout scenario for the Campus with a FAR of 0.85, which is purportedly based on the site development plan described in the certified Final Environmental Impact Report for the BCHD Healthy Living Campus Master Plan. However, the 0.85 FAR referenced in the DPEIR is incorrect. The EIR for the BCHD Healthy Living Campus Master Plan evaluated a proposed project with a FAR that exceeds the 0.85 stated in the DPEIR, even without accounting for the vacant Flagler lot. Importantly, if the City applied a FAR of 1.25, which is proposed for other public/institutional land use designations, this would adequately accommodate the BCHD Healthy Living Campus Master Plan project.

Because of this incorrect information, even if the City is correct in ignoring the Project's maximum FAR of 0.75 for the Campus in its analysis, the DPEIR incorrectly identified the proposed FAR in BCHD's proposed Campus project, as analyzed in its EIR for the BCHD Healthy Living Campus Master Plan. A proper environmental analysis under CEQA depends on accurate data and assumptions, and in this case, the study has been fundamentally flawed because it relies on inaccurate data and assumptions. As a result, the DPEIR must be revised, corrected, and recirculated for public review and comment before the City proceeds with any further action on the proposed Project. This step is essential to ensure that the public and decision-makers are fully informed about the true environmental impacts of the Project.

B. The DPEIR Fails To Acknowledge And Analyze Various Significant Environmental Impacts.[6]

Given the improper buildout methodology used in the DPEIR, assessing impacts related to any environmental resource topic is premature, either on a project or cumulative basis. The "whole" of the Project must be analyzed in an EIR. The "whole" of the project cannot be analyzed with an incorrect buildout methodology. As such, a corrected buildout must be provided before these topics can be properly analyzed and mitigated in a revised and recirculated DPEIR. (CEQA Guidelines § 15151 ["An EIR should be prepared with a sufficient degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences" and that in reviewing an agency's efforts in preparing an EIR, courts look for "adequacy, completeness, and a good faith effort at full disclosure"]; *accord*, CEQA Guidelines § 15204(a) [requiring that a "good faith effort at full disclosure [be] made in the EIR."].)

[6] This Section provides comments on both the Environmental Setting (Chapter 4) and Environmental Analysis (Chapter 5) of the DPEIR.

The DPEIR must be revised and recirculated to contain a thorough analysis of all potentially significant impacts associated with all of the proposed Project's control measures as well as feasible mitigation measures and alternatives designed to avoid or substantially lessen those impacts.

The scope of the proposed DPEIR improperly excludes potentially significant impacts to, among other things, public services, population and housing, and land use and planning. Unless and until those areas are more fully addressed, the scope of the DPEIR is improperly limited and erroneously excludes areas requiring further assessment. In several respects, the DPEIR merely *assumes* the absence of potentially significant impacts, rather than factually demonstrating that significant impacts will not occur if the (unsettled) Project is adopted and implemented. This is insufficient under CEQA. (*City of Redlands v. County of San Bernardino* (2002) 96 Cal.App.4th 398.)

1. The DPEIR Fails To Evaluate the Impacts of the Project on Public Health Services.

Courts have held that an agency failed to proceed as required by law because the EIR's discussion and analysis of a mandatory EIR topic was nonexistent or so cursory it manifestly did not comply with the basic legal requirement that the issue be discussed and analyzed. (*See El Dorado Union High Sch. Dist. v City of Placerville* (1983) 144 Cal.App.3d 123, 132 [EIR contained no discussion of impacts on school district].) Here, the DPEIR wholly fails to address the impacts of the Project on public services provided by BCHD. In fact, the DPEIR conspicuously omits BCHD and public health from the list of "public services" within the Project area, while including things like library, school, fire, and police services. (DPEIR, p. 4-6, 5.13-1.)

BCHD is a public agency that provides preventive health services to South Bay residents, including those in the City. The City's proposed update to its General Plan Land Use Element affects BCHD's 9.7-acre Campus. The Campus is currently improved with medical offices, community wellness and memory care facilities, a maintenance building, and a parking structure. The Campus currently has a public or institutional (P) land use designation in the City's General Plan and is zoned as a community facility ("P-CF") under the City's zoning code. Currently, there is no specified maximum Floor Area Ratio ("FAR") for P-CF zoned parcels. Instead, the existing General Plan allows for flexibility in terms of use by subjecting development to discretionary design review. (Redondo Muni Code § 10-2.1116.)

The building on the Campus, originally constructed in 1958, must be replaced due to its age and seismic deficiencies. [7] A seismic retrofit is economically unfeasible. [8] Additionally, the existing buildings require substantial annual maintenance and investment in the building infrastructure, and soon, BCHD's maintenance costs are expected to exceed its operational revenues. This operational deficit, if prolonged, will lead to a reduction in BCHD programs and ultimately insolvency. To address this, BCHD aims to modernize the Campus to better connect City residents with health and wellness services, programs, and facilities. Since 2017, BCHD has engaged in public outreach to plan and design the Campus. The proposed modernization includes a residential care facility for the elderly (with memory care and assisted living units), space for an all-inclusive care program for the elderly, community services, and a youth wellness center. More information is available online at https://www.bchdcampus.org/faq.

Without any cogent explanation or rationale, the Project sets a maximum FAR on the Campus at 0.75.[9] If adopted, this limit would hinder BCHD's efforts to modernize its outdated and seismically deficient Campus, compromising its ability to provide essential public services, including preventative health care, to the City and surrounding community. Without modernization in the coming years, BCHD will be unable to operate at the Campus, resulting in a loss of vital public health services for the Beach Cities area.

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would "Result in a substantial adverse physical impact associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services." Since none of the elements required to assess compliance with this standard are presented in the DEIR with regards to BCHD or public health generally, neither the City nor the affected public is provided the substantial information upon which a threshold determination may be derived.

The DPEIR must be revised, and the scope expanded, to include a detailed analysis, supported by substantial evidence, regarding potentially significant public services impacts relating to health as well as feasible mitigation measures and alternatives designed to address those impacts.

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[7] A copy of the Campus' Seismic Risk Consulting Report is enclosed as Attachment 1.

[8] A copy of the Bain Brothers feasibility report regarding a seismic retrofit is enclosed as Attachment 2.

[9] In fact, it appears that the proposed 0.75 FAR was advanced for the sole and specific purpose of defeating the proposed modernization of the Campus.

2. The DPEIR Fails To Effectively Evaluate The Impacts Of The Project On Housing And Population.

The DPEIR fails to effectively evaluate the impacts of the proposed Project on housing and population, particularly concerning BCHD's Campus, which plays a crucial role in providing assisted living options for seniors and disabled individuals in in City.

The City's 6th Cycle 2021-2029 Housing Element acknowledges that elderly residents and individuals with disabilities have unique housing needs. (2021-2029 Housing Element, p. 28.) Disabled individuals constitute 6.5% of our City's population, with 45% of them being aged 65 and older. (*Ibid.*) Independent living difficulties are common among these elderly residents. (2021-2029 Housing Element, Table H-18). However, housing options for persons with disabilities, including community care facilities, are limited. Currently, the City has only six residential care facilities for the elderly, with a total capacity of 282 beds. (2021-2029 Housing Element, p. 30). The BCHD Campus houses one of these critical facilities.

The need for suitable housing options for persons with disabilities, including community care facilities, is crucial. The staff report for the Campus' 2006 Conditional Use Permit, which allowed part of its full-service community center to be converted into an assisted living facility, emphasized the urgent need for such facilities to serve elderly individuals wishing to remain in the South Bay area. Similarly, the staff report for the Campus' 2010 Conditional Use Permit to expand the assisted living facility explicitly noted, "[g]iven the aging demographics of [the City's] population, it is not surprising that this facility is looking to expand and it is likely that more of these facilities will be needed in the near future."[10] Moreover, the General Plan Update expressly provides that "it will be important to provide a variety of future residential development for the senior population." (General Plan Update, p. 2-5.)

However, the proposed FAR of 0.75 for the Campus not only limits BCHD's ability to provide ongoing residential care for the City's elderly community but also threatens its overall operations. Without the necessary modernization, BCHD will be unable to continue its services, resulting in a significant loss of essential housing and care facilities for our elderly and disabled population. This restriction contradicts the City's commitment to addressing the specialized housing needs of its residents. (See e.g., DPEIR, p. 5.12-11 ["Proposed policies under the Redondo Beach General Plan's Housing and Land Use Elements would ensure the City supports a variety of housing types and densities and provides job growth to accommodate Redondo Beach's residents"].)

The implementation of a 0.75 FAR on the Campus will displace a substantial number of elderly and disabled individuals or reduce the availability of housing options for these vulnerable populations, necessitating the construction of replacement housing elsewhere. This displacement creates significant disruption and hardship for these vulnerable populations, further exacerbating the housing crisis for those with specialized needs.

[10] These CUPs and staff reports are included as Attachments 3 and 4.

Given these documented effects on our vulnerable senior and disabled population, the DPEIR must be revised, and the scope expanded, to include a detailed analysis, supported by substantial evidence, regarding these potentially significant impacts on housing and population. Furthermore, it should outline feasible mitigation measures and alternatives to address those impacts.

3. The DPEIR Fails to Analyze the Project's Environmental Justice Impacts.

Social and economic factors play an important and explicit part in the CEQA review process. The Legislature stated the intent of CEQA is in part to "[c]reate and maintain conditions under which man and nature can exist in productive harmony to fulfill the social and economic requirements of present and future generations." (Pub. Resources Code § 21001(e) [emphasis added].) Significantly, the economic and social effects of a project's physical changes to the environment may be considered in determining that the physical change is a significant effect on the environment. (CEQA Guidelines § 15064(e) ["If the physical change causes adverse economic or social effects on people, those adverse effects may be used as a factor in determining whether the physical change is significant. For example, if a project would cause overcrowding of a public facility and the overcrowding causes an adverse effect on people, the overcrowding would be regarded as a significant effect"]; CEQA Guidelines 15131(b) ["economic and social effects of a physical change may be used to determine that the physical change is a significant effect on the environment"].) Moreover, SB 1000, enacted in 2016, requires local governments in California to incorporate environmental justice into their general plans. This means they must identify and address the needs of disadvantaged communities that face disproportionate environmental and health risks.

The CEQA Guidelines illustrate how a physical change to the environment can be a significant impact based on the social or economic impact of that physical change: "For example, if the construction of a new freeway or rail line divides an existing community, the construction would be the physical change, but the social effect on the community would be the basis for determining that the effect would be significant." (CEQA Guidelines § 15131(b); see also CEQA Guidelines § 15382 ["A social or economic change related to a physical change may be considered in determining whether the physical change is significant"].)

Accordingly, an agency is required to find that a "project may have a 'significant effect on the environment'" if, among other things, "[t]he environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly." (Pub. Res. Code § 21083(b)(3).) An indirect effect that requires CEQA analysis can be an economic one: if a proposed development project may cause economic harm to a community's existing businesses, and if that could in turn "result in business closures and physical deterioration" of that community, then the agency "should consider these problems to the extent that potential is demonstrated to be an indirect environmental effect of the proposed project." (See *Citizens for Quality Growth v. City of Mt. Shasta* (1988) 198 Cal.App.3d 433, 446.)

Here, the DPEIR fails to meet these CEQA requirements for at least two significant reasons. First, the Project's proposed maximum Floor Area Ratio (FAR) of 0.75 effectively prevents the BCHD from modernizing its Campus, which currently provides essential health and housing services to disabled individuals. According to the Housing Element, 6.5% of the City's population is disabled, with 45% of these individuals being aged 65 and older (2021-2029 Housing Element, p. 28). The modernization of the BCHD Campus is crucial for continuing to offer these critical services to our disabled and aging residents.

Without the ability to modernize its facilities, BCHD will be unable to function effectively, resulting in the potential elimination of health services vital to the well-being of these vulnerable populations. The DPEIR does not address this significant impact, which disproportionately affects disabled and aging residents, thereby raising serious environmental justice concerns. Pub. Resources Code § 21083(b)(3) states that a project's environmental effects must be considered significant if they cause a substantial adverse effect on human beings. The failure to account for the Project's impact on the availability of health services for disabled and aging residents falls squarely within this criterion.

Second, the Project impacts employment in the healthcare sector due to the inability to modernize the Campus.[11] Health care is one of the largest occupational categories in the City of Redondo Beach, as outlined in the General Plan Update (DPEIR, p. 5.12-5). The Project's proposed maximum FAR of 0.75 precludes the BCHD from modernizing its Campus, which in turn hinders its ability to provide jobs in this crucial sector. Without modernization, the BCHD's ability to function and offer employment opportunities will be severely compromised, leading to a significant loss of jobs in the community.

The loss of these jobs would not only affect those employed in the healthcare sector but also have broader economic implications for the City, including reduced access to essential health services for residents. The DPEIR does not adequately address the potential social and economic impacts resulting from the loss of these jobs, particularly as they relate to environmental justice concerns. CEQA Guidelines Section 15131(a) requires the consideration of the economic and social effects of a project when they are related to the physical changes in the environment. The Project's impact on employment in the healthcare sector and the subsequent loss of services constitute a significant indirect physical effect that has not been sufficiently analyzed.

The proposed Project would deprive South Bay residents of critical health and housing opportunities, leading to irreparable social and economic impacts on public land uses in the City. Specifically, the Project would result in the loss of access to health and assisted living facilities, aging residents and health services, and critical employment opportunities. These impacts disproportionately affect vulnerable populations, particularly disabled and aging residents, and as such, should be carefully analyzed under the environmental justice provisions of CEQA.

[11] Additionally, the proposed FAR on the Campus is inconsistent with the General Plan Update's goal to "Maintain existing employers" (General Plan Update, p. 2-27). By hindering BCHD's ability to modernize, the Project contradicts this goal and threatens the stability of one of the City's employers.

The DPEIR must be revised to include a thorough analysis of the Project's environmental justice impacts, particularly as they relate to the potential loss of health services and employment opportunities for disadvantaged communities. Without this analysis, the EIR fails to comply with CEQA's mandate to protect the environment and public health, especially for those who are most vulnerable.

C. The DPEIR Fails to Recognize and Analyze Inconsistencies Between General Plan Update Land Use Policies and Proposed Maximum Density/Intensity for Land Use Designations.

CEQA mandates that an EIR must include a discussion of any inconsistencies between the proposed project and applicable general plans or regional plans, including all elements of the General Plan. (14 Cal Code Regs §15125(d)). This requirement is crucial because it ensures that the public and decision-makers are fully informed about the extent to which the proposed project aligns with or deviates from the long-term vision and policies set forth in the General Plan. Such an analysis is essential for evaluating whether the Project is consistent with the community's goals and whether the environmental review is based on a stable and accurate project description.

However, the DPEIR does not provide a thorough analysis of these inconsistencies. Instead, it largely overlooks how the Project may conflict with various elements of the proposed General Plan, including Land Use and Housing Elements. This omission undermines the DPEIR's compliance with CEQA and deprives the public and decision-makers of critical information needed to assess the Project's potential environmental impacts comprehensively.

For instance, the proposed maximum FAR is not consistently applied to all properties with a public or institutional (P) land use designation in the General Plan and zoned P-CF. For example, properties within the City's civic center and the City-owned property at the northeast corner of Pacific Coast Highway and Vincent Street have a proposed maximum FAR of 1.25. However, other properties with a public or institutional (P) land use designation, including the Campus and school sites within the City, have a maximum FAR of 0.75. It's important to note, however, that school sites have a different use and zone designation – school facilities (P-SF) – and may be exempt from local land use regulations under the Government Code. This means that BCHD's Campus is the *only* property of its size with a public or institutional (P) land use designation in the General Plan and zoned P-CF affected by this proposed limitation.

Further, the proposed maximum FAR of 0.75 in the draft General Plan update for the Campus is inconsistent with the land use policies and goals of the General Plan, especially regarding public and institutional uses, health and land use, and health partnerships. The Campus aims to provide a well-being hub that serves and connects Beach Cities residents of all ages with abundant health and wellness services, programs, and facilities. The proposed FAR of 0.75 would constrain the Campus' redevelopment and prevent BCHD from achieving its mission. Specifically, the FAR is inconsistent with the following policies identified in the draft General Plan Update:

- **Policy LU-1.13: Public and Institutional Uses.** This policy states that the City should "Provide for the continuation of existing and expansion of governmental

administrative and capital facilities, schools, libraries, hospitals and associated medical offices, public cultural facilities, and other public uses, ancillary parks, recreation and open spaces and other public land uses and facilities to support the existing and future population and development of the City." (Draft General Plan Update, p. 2-18; DPEIR, p. 5.10-7) The Campus is a public and institutional use that provides essential health and wellness services to the community. Without modernization, the Campus will be unable to meet the growing and changing needs of Beach Cities residents, leading to a loss of these critical services. The proposed FAR of 0.75 would undermine this policy by limiting the floor area available for these vital purposes, ultimately compromising the health and well-being of the community.

- **Policy LU-4.2: Health and Land Use**. This policy states that the City should "Seek to incorporate health considerations into land use planning decisions in a manner that improves health and well-being." (Draft General Plan Update, p. 2-20; DPEIR, p. 5.10-9) The Campus exemplifies this policy by creating a hub that promotes health and well-being for all generations. However, the proposed FAR of 0.75 would prevent the modernization of the Campus. Without the necessary modernization of the Campus, BCHD will be unable to operate, leading to a deterioration in community health and wellness.

- **Policy LU-4.7: Health Partnerships**. This policy states that the City should "Build and maintain partnerships with health care providers, health-promoting non-profits, and community-based organizations to evaluate and implement land use projects in a manner that improves community health." (Draft General Plan Update, p. 2-21).[12] The Campus reflects this policy by partnering with BCHD, a public agency that provides a wide range of preventive health services to South Bay residents, including those in the City. The proposed FAR of 0.75 would eliminate the Campus' ability to efficiently connect City residents with health and wellness services, programs, and facilities. By imposing this restrictive FAR, the City is essentially dismantling and disregarding its partnership with BCHD, jeopardizing the goal of promoting health in the City and leading to a significant loss of essential health facilities and services for Beach City residents.

Finally, the proposed FAR of 0.75 for the Campus limits its ability to provide ongoing residential care for the City's elderly and disabled community, which directly conflicts with the City's commitment to addressing their specialized housing needs as outlined in the Housing Element. (See e.g., 2021-2029 Housing Element, pp. 28-30, Table H-18). By imposing such a restrictive FAR, the Project undermines the City's ability to meet the growing demand for

[12] The DPEIR notably omits this policy from its environmental analysis (DPEIR, p. 5.10-9). The DPEIR must be revised to include this policy to evaluate its consistency with the General Plan Update's proposed land use designation limitations, particularly the maximum FAR of 0.75 on the Campus.

residential care facilities for elderly and disabled residents. This restriction is not only inconsistent with the goals and policies of the Housing Element but also jeopardizes the ability of seniors to access necessary care within their community.

The failure to address these inconsistencies not only violates CEQA Guidelines but also calls into question the validity of the DPEIR as a tool for informed decision-making. To remedy this deficiency, the City must revise the DPEIR to include a detailed analysis of all inconsistencies between the Project and the elements of the proposed General Plan, considering the Project's alignment with the community's long-term planning goals and evaluating the potential environmental consequences of any conflicts. Specifically, the DPEIR must address the inconsistencies between the General Plan Update's land use policies and the proposed maximum density/intensity for land use designations. Additionally, the DPEIR should include a detailed analysis, supported by substantial evidence, of the significant impact that the proposed FAR on public and institutional uses will have on the availability of essential health services and housing and care facilities for our elderly and disabled residents. It should also outline feasible mitigation measures and alternatives designed to address those impacts.

D. The Draft SEIR Fails To Adequately Analyze Feasible Alternatives.

CEQA requires that an EIR include a reasonable range of alternatives to the project that would feasibly meet most of the basic project objectives while avoiding or significantly reducing the project's significant impacts. (CEQA Guidelines § 15126.6.) The EIR's alternatives analysis does not comply with CEQA because it includes a legally infeasible alternative as well as an alternative that would not meet most of the basic project objectives and/or avoid or substantially lessen significant environmental impacts. Specifically, it does not analyze any alternative that would mitigate the environmental impacts identified in this letter.

E. BCHD was not provided an adequate opportunity to be involved in the preparation of the General Plan update, as required by Gov. Code §§ 65351, 65352, before being submitted to environmental review.

According to Government Code § 65351, the City is required to involve public agencies in the preparation of any amendment to the General Plan. Furthermore, Government Code § 65352 mandates that the City refer any proposed action to amend the General Plan to specified governmental entities, including any special district, such as BCHD, that may be significantly affected by the proposed amendment. Each of these governmental agencies must be given a minimum of 45 days to review and comment on the proposed amendment.[13] Toward that end,

[13] As set forth above, at the August 15 Planning Commission meeting, Commissioner Sheila Lamb disclosed her intent to propose additional revisions to the City's land use language relating to the Campus. She did not specify the proposed changes at that time, indicating that she preferred to introduce these changes at the next Planning Commission meeting—after the public review period for the EIR has closed. This approach would allow the changes to be included without environmental review and public scrutiny, including comments from the BCHD, which is a clear violation of not only these provisions, but also CEQA.

agencies are encouraged to "[c]onsult[] with state and local responsible agencies before and during preparation of an environmental impact report so that the document will meet the needs of all the agencies which will use it." (CEQA Guidelines, § 15006, subd. (g); *Banning Ranch Conservancy v. City of Newport Beach* (2017) 2 Cal.5th 918, 936.)

BCHD did not receive any notice of the General Plan Update, including the proposed maximum FAR until being served with the Notice of Preparation of Draft EIR. By failing to involve BCHD in the process, the City allowed land use practices that will jeopardize BCHD's ability to continue its mission of providing necessary public services, including preventative health care to the City and surrounding community, to be included in the proposed General Plan update that is being reviewed.

F. The DPEIR is So Fatally Flawed That Recirculation is Required.

CEQA requires that an EIR be recirculated when "significant new information is added to the EIR" before certification of the document. (See CEQA Guidelines § 15088.5.) "Significant new information" includes a disclosure that a "new significant environmental impact would result from the project" or the "draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded" (*Ibid.*)

For all of the reasons discussed above, the DPEIR's inaccuracies and omissions constitute a serious and significant failing of the process and run counter to CEQA's mandates that an "EIR is to inform other governmental agencies and the public generally of the environmental impact of a proposed project." (CEQA Guidelines, § 15003(d).) BCHD therefore objects to any further action on the Project until the necessary and proper environmental review has been completed and the public has been provided a meaningful opportunity to comment on the new EIR.

III. CONCLUSION

While it is plain that an EIR is needed in connection with this proposed Project, it is also clear that the DPEIR should be more complete than the version that was provided for public review and comment. The current version of the DPEIR fails to adequately describe the "Project" thereby thwarting effective public review and comment on the General Plan Update. In several key areas, it fails to thoroughly and adequately identify the Project's significant environmental impacts and propose feasible mitigation measures and alternatives to avoid or substantially lessen such impacts. As such, the DPEIR fails to comply with CEQA, and the DPEIR must therefore be revised, corrected, and re-circulated with all of the analysis and other content required by CEQA before the City may lawfully act on the Project.

Thank you for your consideration of BCHD's comments on the DPEIR. Please do not hesitate to contact the undersigned with any questions concerning this correspondence.

Very truly yours,

BEACH CITIES HEALTH DISTRICT

Tom Bakaly
Chief Executive Officer

cc: Monica Suua, CFO, Beach Cities Health District (monica.suua@bchd.org)
Joseph Larsen, Rutan & Tucker LLP (jlarsen@rutan.com)
Michael W. Webb, City Attorney, City of Redondo Beach
(michael.webb@redondo.org)

Attachment 1

Seismic Risk Consulting Report

by ImageCat, Inc.



Beach Cities Health Center

514 North Prospect Avenue
Redondo Beach, CA 90277

Prepared For:

Beach Cities Health District
514 North Prospect Avenue
Redondo Beach, CA 90277

October 21, 2021

ImageCat, Inc.

ImageCat, Inc.
400 Oceangate Ste. 1050
Long Beach, CA 90802
Phone: (562) 628-1675

October 21, 2021

Beach Cities Health District
514 North Prospect Avenue
Redondo Beach, CA 90277

Attention: Tom Bakaly, Chief Executive Officer

Report: **Seismic Risk Consulting – Beach Cities Health Center**
514 North Prospect Avenue, Redondo Beach, CA 90277

Dear Mr. Bakaly,

ImageCat, Inc. (ImageCat) is pleased to present this report to Beach Cities Health District (BCHD) for seismic risk consulting regarding the Beach Cities Health Center towers, located at 514 North Prospect Avenue, in Redondo Beach, California (ZIP 90277). The property consists of a 4-story medical office building with 1 subterranean level. It is of reinforced concrete construction, composed of the North Tower (built in 1957 with a low-rise extension to north), the South Tower (built in 1967), and the Elevator Tower (built in 1967). The North Tower, the South Tower and the Elevator Tower are all separated by seismic joints. The low-rise extension of the North Tower is not part of the scope for this study. We understand that this study is needed to inform your decision-making process related to redevelopment/retrofit plans to achieve seismic safety while continuing to provide services to the community.



Site View

Purpose of the Study

BCHD has asked ImageCat, working together with Nabih Youssef Associates, to consider a number of different alternatives for the future of the buildings: 1) maintain status quo (i.e., no action to be taken or NO PROJECT to be planned or executed), 2) demolish today, 3) demolish in 3-5 years, with completion of the construction for a replacement facility, and 4) seismic retrofit of the existing buildings. This report addresses all four alternatives. For alternative 1, we present the estimated probabilistic risks associated with the structures in their status quo condition, examined for various durations of future usage. For the other three alternatives, ImageCat has qualitatively described the likely outcomes and various implications to BCHD, its customers, and other stakeholders. For each of the itemized implications, BCHD may refer to results of previous analyses conducted by financial consultants for quantitative information on costs and/or benefits.

Scope of Study

In this study, ImageCat reviewed the earthquake hazards for the subject site (ground shaking, liquefaction, and surface fault rupture) using published geological maps and a recent geotechnical investigation report [Converse Consultants, 2016].

We reviewed various available Architectural and Structural design drawings (original and expansion sets), and the Seismic Evaluation report [Nabih Youssef Associates (NYA), 2018]. We conducted multiple discussions with Engineers from NYA to obtain a detailed understanding of their findings on the structures' characteristics and current conditions and shared our observations. A Structural Engineer from ImageCat conducted a visual survey at site to assess existing configuration, conditions, and usage of the structures.

To examine seismic risks for the structures in their status quo conditions, ImageCat performed risk analysis using SeismiCat, ImageCat' earthquake risk tool for individual sites. Results include tables and curves relating the severity of the estimated probabilistic risks for various durations of future usage (short- and long-term) along with corresponding information on building stability, and downtime.

ImageCat also qualitatively described the outcomes and implications of the other considered alternatives according to our understanding, conversations with BCHD, and review of preliminary financial feasibility studies conducted by other consultants (Cain Brothers, CBRE, 2020).

Reliance

This report may be used and relied upon by Beach Cities Health District (BCHD) and each of its respective successors and assigns.

Organization of This report

This report summarizes the results of ImageCat's seismic risk review and is organized as follows:

1. Site Seismic Hazards
2. Building Vulnerability
3. Seismic Risk Results
4. Limitations

Appendices

1. Site Seismic Hazards

The earthquake hazards we considered include strong ground shaking, soil liquefaction, surface fault rupture and slope instability. Findings are drawn from published maps, a recent site geotechnical investigation report [Converse Consultants, 2016] and the ground shaking models of the U.S. Geological Survey (USGS).

1.1 Seismic Setting

California is the most seismically active of the United States. The San Andreas Fault strikes north-northwest from the Mexican border, past Los Angeles, and San Francisco, until it veers offshore near Eureka. The San Andreas forms the active boundary between two tectonic plates in relative motion. To the west of the San Andreas Fault extends the Pacific Plate, while to the east lies the North American Plate. Along most of the fault, the boundary is held locked by tremendous forces as the plates build up strain energy. Eventually, the constraining forces are overcome along stretches of this boundary, allowing sudden relative motion between the two sides of the fault. The strain energy stored in the rock is violently released as seismic waves, radiating outward from the rupturing fault segment. At the ground surface, hazards that accompany large earthquakes may include strong ground shaking and surface fault rupture, liquefaction, and landslide.

Within the Los Angeles basin, a set of faults including the Malibu Coast, Hollywood, Santa Monica, Sierra Madre and Cucamonga faults, forms the boundary between two physiographic provinces. To the north of the boundary is the Transverse Ranges Province, where seismic activity dominated by reverse and thrust faulting, giving rise to the Santa Monica and San Gabriel mountains. To the south is the Peninsular Ranges Province which features strike-slip faulting such as the Newport-Inglewood and the Elsinore fault systems, and blind thrust faults, such as the San Joaquin Hills Thrust and the Puente Hills Thrust. The site is found south of the boundary, within the Peninsular Ranges. All of these local faults give rise to frequent earthquakes, with attendant strong ground shaking, soil liquefaction, surface fault rupture, landslide and other hazards.

Of particular interest to BCHD are the Palos Verdes Fault and the Newport-Inglewood Fault. These are the closest and most active faults that can strongly affect the building. The Newport-Inglewood Fault displays strike-slip motion and produced the 1933 Long Beach Earthquake (M6.3). It can produce an earthquake of M7.1 if its onshore segments rupture together. It is thought to link with offshore segments that continue south to the Rose Canyon Fault and are capable of producing a large event if they rupture together. The Palos Verdes Fault has been active in late Quaternary time and is capable of a M7.3 earthquake. Further details and technical fault descriptions from the USGS for the four closest faults are included in Appendix B.

1.2 Local Faulting

The closest significant regional faults and their distances to the project site are tabulated below. Figure 1 shows the site location with respect to regional faults. These known faults all contribute to the ground shaking hazard and associated hazards at the site. Other, hidden faults also contribute to the hazard, and all of these faults are comprehensively considered in the USGS model.

Distance from Site to Regional Faults

Fault Name	Type	Limiting Magnitude	Distance (mi.)
Compton	RV	7.4	1.8
Palos Verdes	SS	7.3	2.4
Redondo Canyon	SS	6.2	3.0
Newport-Inglewood	SS	7.1	6.5
San Pedro Escarpment	RV	7.1	9.5
Puente Hills	RV	6.8	11.7
Santa Monica	SS	6.7	13.2
Elysian Park	RV	6.8	13.7
San Pedro Basin	SS	7.0	14.6
San Vicente	SS	6.2	14.6
Malibu Coast	SS	6.6	14.7
Anacapa-Dume	SS	7.1	15.2
Hollywood	SS	6.6	15.7
North Salt Lake	RV	6.0	16.0
Anaheim	SS	6.2	18.1
Raymond	SS	6.6	20.6

SS = Strike-slip; RV = Reverse

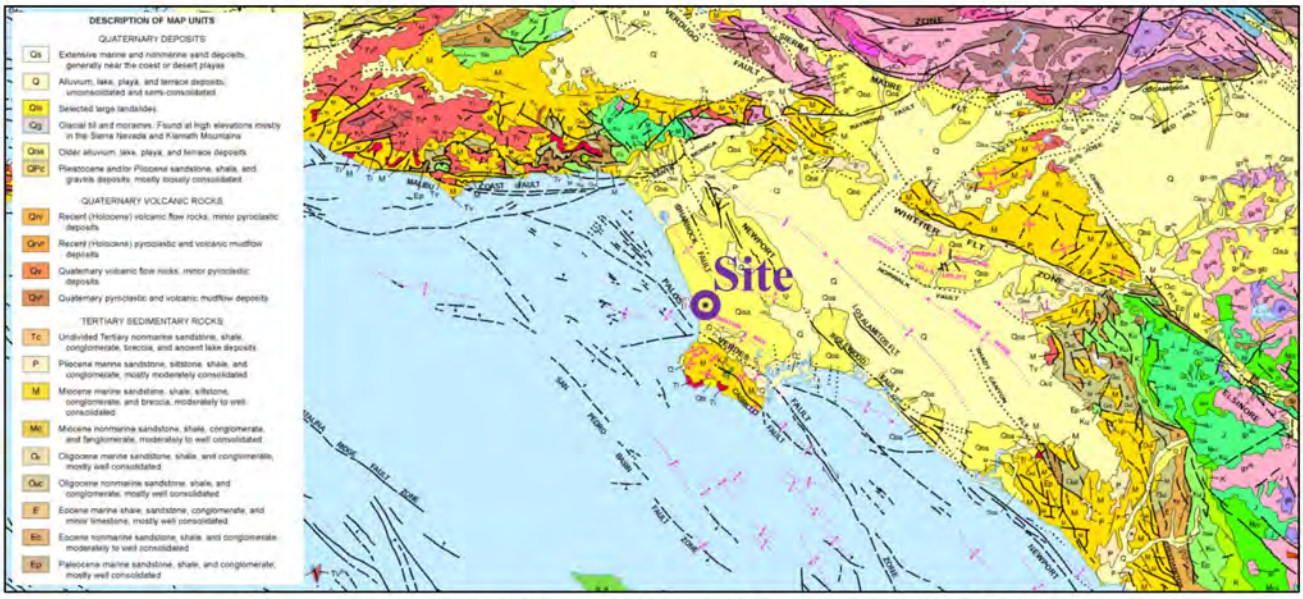


Figure 1 – Site Location, Geology and Local Faulting [CGS]

1.3 Surface Fault Rupture

Surface fault rupture can cause vertical and horizontal offsets that damage underground utilities and structural foundations that cross the fault. The State of California maintains maps of active faults known to rupture the ground surface [California Geologic Survey, SP-42] for the purpose of preventing structures from being built across the potential surface fault rupture. No known surface-rupturing faults cross the site [Redondo Beach quadrangle, CGS, 1999]. Based on this brief screening review of local faulting, we do not expect local surface fault rupture to contribute to the seismic risks at the site during the useful life of the buildings. BCHD's Geotechical Engineer, Converse Consultants, came to the same conclusion.

1.4 Landslide

Historically, landslides triggered by earthquakes have been a significant cause of earthquake damage. Areas that are most susceptible to earthquake-induced landslides are steep slopes in poorly cemented or highly fractured rocks; areas underlain by loose, weak colluvial soils; and areas near or within previous landslide deposits. The relatively flat site is NOT found within a Zone of Required Investigation for Landslide as defined by the State of California [Redondo Beach quadrangle, CGS, 1999]. We do not expect the site to be subject to earthquake-induced slope instability. BCHD's Geotechical consultant, Converse Consultants, also concluded that the site should not experience earthquake-induced slope instability.

1.5 Liquefaction

Earthquake-induced liquefaction is a ground failure phenomenon in which loose, sandy soils below the water table lose shear strength when subjected to many cycles of strong ground shaking. The effects of liquefaction may include settlement, lurching and lateral spreading. Where liquefaction occurs beneath building foundations, large settlements or dislocations can cause high levels of structural damage.

The site is NOT found within a Zone of Required Investigation for Liquefaction as defined by the State of California [Redondo Beach quadrangle, CGS, 1999]. According to the recent Geotechnical investigation report [Converse Consultants, 2016], the site soils consist of a fill layer underlain by alluvial soils extending to the maximum explored depth of 61.5 feet Below Ground Surface (BGS). The fill layer consist of silty sand and clayey sand to depths ranging between 3 to 13 feet BGS. The alluvial sediments consist of older dune and drift sand. Groundwater was not encountered during site explorations. Considering the relatively dense site soils and the absence of a shallow groundwater table, the Geotechnical Engineer concluded that potential for liquefaction risk at site is low.

1.6 IBC Classification of Soils

Site ground conditions affect the intensity and duration of ground shaking, as well as the shape of the ground motion response spectrum. In comparison to rock sites, soft soils amplify moderate ground motions, extending the duration of ground shaking, and shifting seismic energy to longer periods.

Based on the soil characteristics describe above and the site geotechnical report [Converse Consultants, 2016], ground conditions correspond to Site Class D as described in the International Building Code (IBC) and ASCE-7. The earthquake motions used in this study were computed directly for this condition.

1.7 Strong Ground Shaking

1.7.1 Previous Ground Shaking

The Redondo Beach site has not been subject to high levels of ground shaking since the construction of the buildings in question (1957-1967). Prior to the construction of the towers, the site was strongly shaken in the 1933 Long Beach Earthquake (M6.4). Maps of the earthquake show shaking in the general area may have corresponded to Modified Mercalli Intensity (MMI) of VIII. See Appendix C – Earthquake Risk Glossary for a description of the Modified Mercalli Intensity scale, used prior to the deployment of widespread strong motion instrumentation. Other earthquakes occurring over the life of the existing structures include 1971 Sylmar (M6.6), 1987 Whittier-Narrows (M6), 1992 Landers (M7.3) and Big Bear (M6.8), and the 1994 Northridge (M6.7) event. Ground shaking intensities in these events were generally slight or slight to moderate, and we know of no reported damage from any of these past events.

1.7.2 Future Ground Shaking

Using the comprehensive probabilistic seismic hazard model from the U.S. Geological Survey [Petersen, Frankel, et al, 2014; Schumway et al., 2018], ImageCat has estimated the site ground shaking hazards. This model includes all of the major known surface faults. It also accounts for the scattered seismicity that is not associated with these major faults.

As an example of the level of seismicity and ground shaking at this site, we have estimated the levels of motion that have a 10% chance of being exceeded within the 50-year exposure. This level of ground shaking may be viewed as having an average return period of 475 years. The peak ground acceleration **(PGA) is 0.47g**, the short-period spectral acceleration **(Ss) is 1.09g**, and the 1-second spectral acceleration **(S1) is 0.66g**. In our risk estimates in Section 3, we make use of probabilistic hazards for this site at a wide range of annual probabilities (or equivalently, for a wide range of return periods).

1.8 Other Seismic Hazards

The existing site grade is at elevations more than 150 feet above mean sea level. The site is not within a tsunami inundation zone [CGS] and we conclude that it should not be affected by tsunami hazards. Other seismic hazards such as fire and blast do not appear to affect this site.

1.9 Discussion of Hazards

The seismic hazards for the site at 514 North Prospect Avenue, in Redondo Beach are dominated by frequent strong ground shaking. Other hazards such as earthquake-induced landslide, soil liquefaction or surface fault rupture do not appear to be significant at this site. The ground shaking hazard is stronger than assumed in the original design codes (i.e., the 1955 and 1964 editions of the Uniform Building Code), and the buildings' design predates the Importance Factor (I-factor) in the code, which increased the ground motions and resulting design forces for essential facilities like hospitals. New design and construction at the site to current codes can easily account for the seismic hazards at the site to provide a higher level of earthquake resistance and more resilent performance.

2. Building Vulnerability

All three structures (i.e., the North Tower, the South Tower, and the Elevator Tower) are of reinforced concrete construction. They all have complete gravity and lateral load resisting systems. The gravity loads are carried by reinforced concrete floors (concrete slab and pan joist system) that rest on concrete girders, columns, load-bearing walls, and columns that carry the loads down to the reinforced concrete foundations.

Lateral loads in buildings are caused by earthquakes or winds. In California, lateral loads from earthquakes often govern the design for this type of buildings. Reinforced concrete floor slabs act as rigid diaphragms and collect lateral loads in each floor. These loads are then distributed to the vertical lateral load resisting elements such as reinforced concrete shear walls and reinforced concrete moment resisting frames. These elements carry the loads down to reinforced concrete foundations. The North Tower has shear walls in both the north-south and east-west directions. It also has additional moment resisting frames in the east-west direction. The south tower has shear walls in the east-west direction, and moment resisting frames in the north-south direction. The elevator tower has a core system with shear walls around its perimeter.

All three of these buildings were designed and constructed before 1970. During the past 50 years, many substantial changes have occurred in analysis and design codes and procedures for reinforced concrete structures, including increases in seismic hazard levels and the resulting design forces. Most of these changes were the results of lessons learned from past earthquakes. The 1971 San Fernando Earthquake (M6.7) exposed major strength and ductility deficiencies in concrete structures designed under then-current provisions of the Uniform Building Code (UBC). Good earthquake performance requires both "strength" and "ductility." Strength is needed to keep the structure undamaged under low-to-moderate earthquake motions. Ductility ("toughness") requires reinforcement detailing to confine the concrete and withstand overloads and large deformations while maintaining strength and stability. These observations of failures in led to major revisions in requirements for design of new concrete buildings.

For existing buildings (similar to the subject buildings), national standards like ASCE 41-17 "Seismic Evaluation and Retrofit of Existing Buildings" provide appropriate methods to identify the existence and severity of various seismic deficiencies that can affect building's performance in future events in terms of damage and stability. The standard also provides guidance on the retrofit methods. The seismic evaluation study by NYA (dated 2018) followed this standard to identify deficiencies that can lead to stability issues affecting life-safety, as well as affecting structural and nonstructural damage, with implications for repair costs and downtime. ImageCat's review of NYA's report and discussions with NYA have improved our understanding of these buildings.

We note that several cities in California (e.g., Los Angeles, San Francisco, Santa Monica, etc.) are now citing older, nonductile (or "brittle") reinforced concrete buildings under ordinances requiring evaluation of known typical deficiencies followed by seismic retrofit design and construction (or demolition) where these deficiencies are confirmed. At present, the City of Redondo Beach does not have such an ordinance in force, but it is possible in the future that the City will enact one. Any plans to continue use of these buildings over the long term should consider this possibility.

The sections below present findings from our review of original Structural drawings, visual site survey, and discussions with Structural Engineers from NYA in more detail and in technical terms.

2.1 Building Seismic Vulnerability

2.1.1 North Tower

Basis:	Original Architectural and Structural design drawings (dated 1957); Site geotechnical investigation report [Converse Consultants, 2016]; Seismic Evaluation Report [NYA, 2018]; Visual site survey by R. Imani PhD, PE, SE of ImageCat on 8/11/2021.
Architect:	Walker, Kalionzes, Klingernan Architects, Los Angeles, CA.
Structural Engineer:	Henry M. Layne, S.E.
Geotechnical Engineer:	The original Geotechnical Engineer is not identified on the drawings.
Year Built:	1957
Design Code:	The 1955 Edition of the Uniform Building Code (UBC)
Height:	4-story with a roof-top mechanical penthouse and 1 basement level.
Materials:	Concrete has 28-day compressive strength (f'c) of 2,000 psi for slab-on-grade, and 2,500 psi for all other elements. Reinforcing steel conforms to ASTM A305, intermediate grade. All steel pipe columns are ASTM A53, Grade B.
Foundations:	Reinforced concrete spread footings, continuous strip footings and a 4" thick slab-on-grade. Maximum allowable soil bearing pressure is 5,000 psf.
Gravity System:	One way reinforced concrete slab spans over reinforced concrete pan joists resting on reinforced concrete girders that are supported by reinforced concrete columns or load-bearing walls. These elements transfer the loads down to reinforced concrete foundations.
Lateral System:	Reinforced concrete floor slabs act as rigid diaphragms, collecting and redistributing lateral forces to reinforced concrete shear walls acting in both directions of the building. Deep reinforced concrete spandrel beams frame into concrete columns to form moment-resisting frames on the exterior lines in the east-west direction. These elements transfer the loads down to reinforced concrete foundations.
Remarks:	Reinforced concrete shear walls are 6" to 12" thick with 2 layers of vertical and horizontal reinforcement (except for the 6" thick walls). Distributed horizontal and vertical reinforcing typically consists of #4 bars spaced at 11 to 17 inches on center. Spandrel beams have #5, #6 or #9 continuous bars at top and bottom, and #3 or #4 stirrups spaced at 16 or 17 inches on center. Reinforced concrete columns have square, rectangular, or circular sections, with #6, #7 or #8 vertical bars and #2 ties spaced at 8 or 12 inches on center, or 3/8" diameter spirals with a 1-3/4" pitch. Transverse reinforcing for both spandrels and columns are significantly less than the ductility and

shear strength requirements of the current codes, making them vulnerable to brittle shear failure.

The roof-top mechanical penthouse has reinforced concrete shear walls around its perimeter.

A seismic gap of 4" exists between the North Tower and the low-rise (1- and 2-story) expansion building to the north.

The building has vertical irregularity deficiency in parts of the lateral load resisting system where discontinuous shear walls are supported by beams or columns of lower floors (e.g., penthouse shear walls supported by roof beams and two columns along the north side of the building supporting another discontinuous shear wall). This condition may lead to overstress with increased seismic damage or collapse in the supporting members.

Condition: Fair to good.

Architectural Notes: Exterior walls have painted concrete surfaces. The building has a built-up roof system.

Equipment Notes: Various types of equipment were observed to be well-anchored (HVAC units on roof, supply fans in roof-top penthouse, water heaters, elevator machinery, etc.

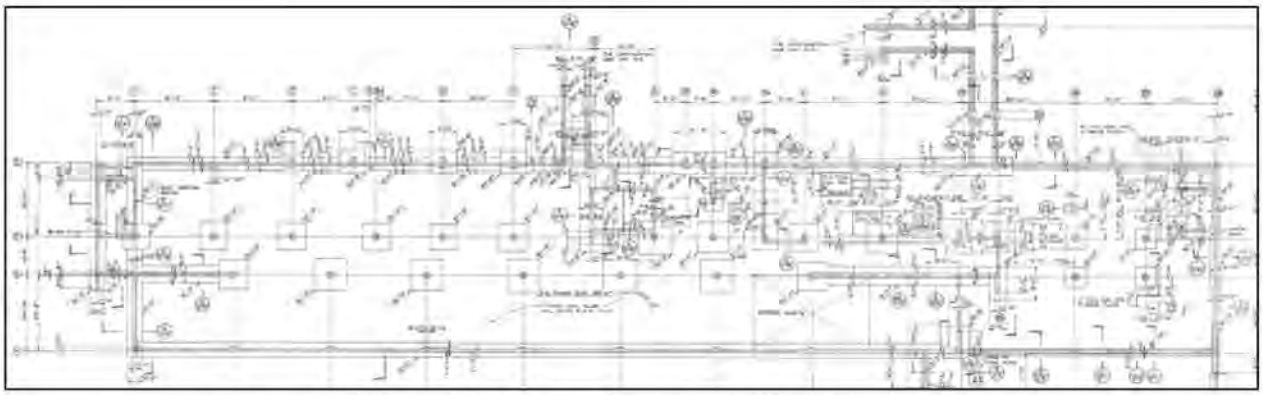


Figure 2 – Foundation and Basement Plan (North Tower)

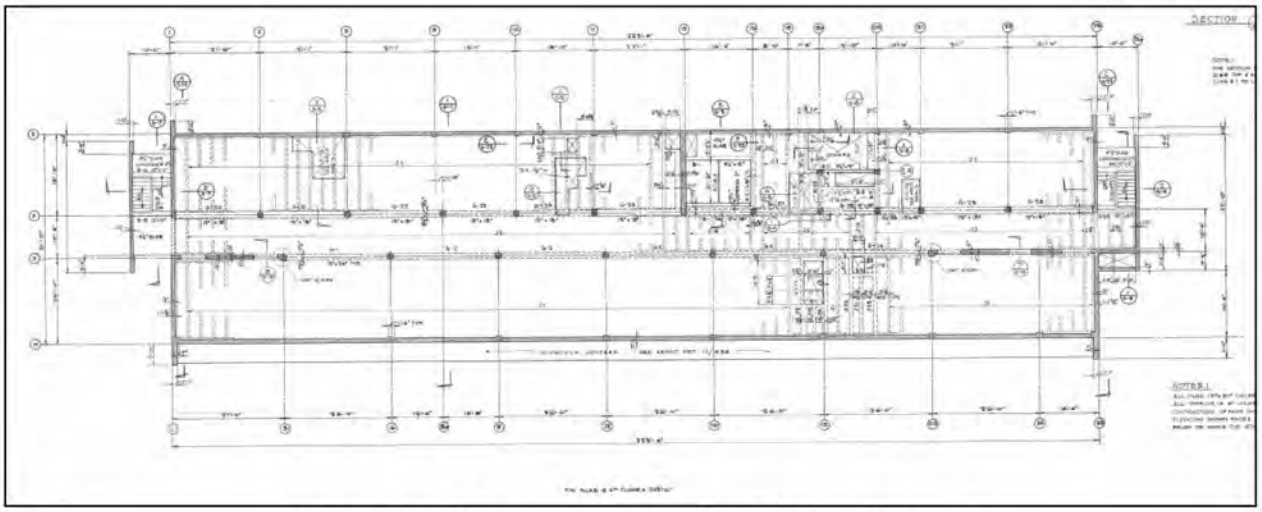


Figure 3 – 4th Floor Framing Plan (North Tower)

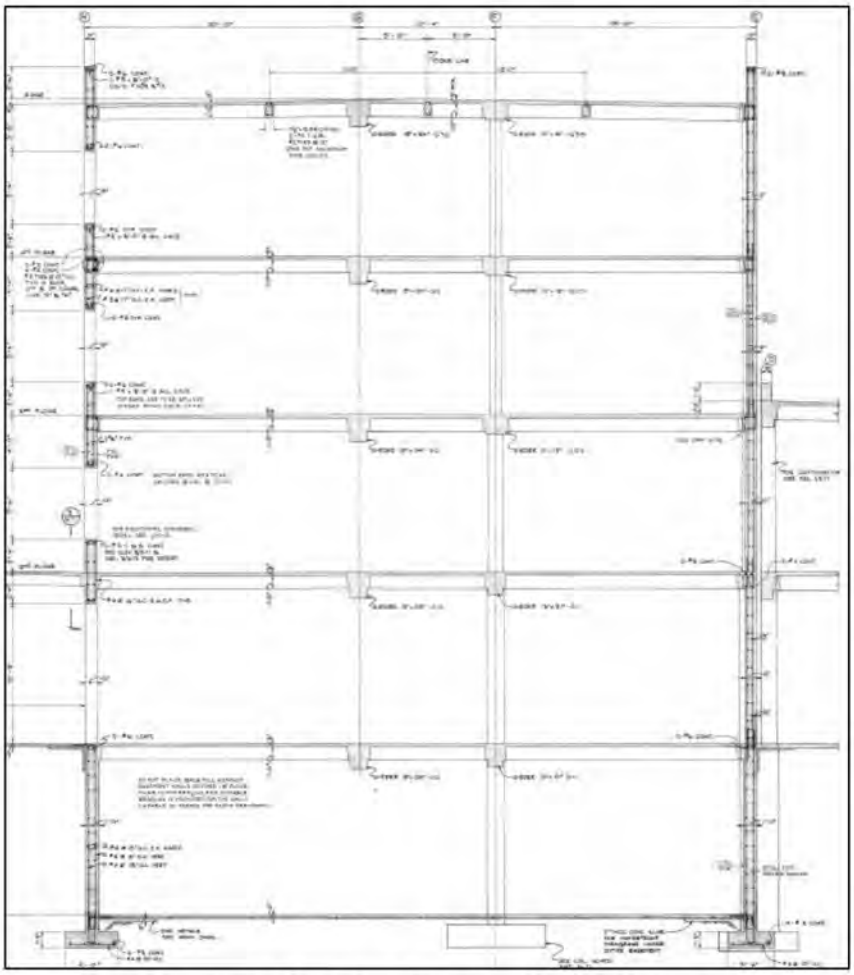


Figure 4 – Building Section (North Tower)

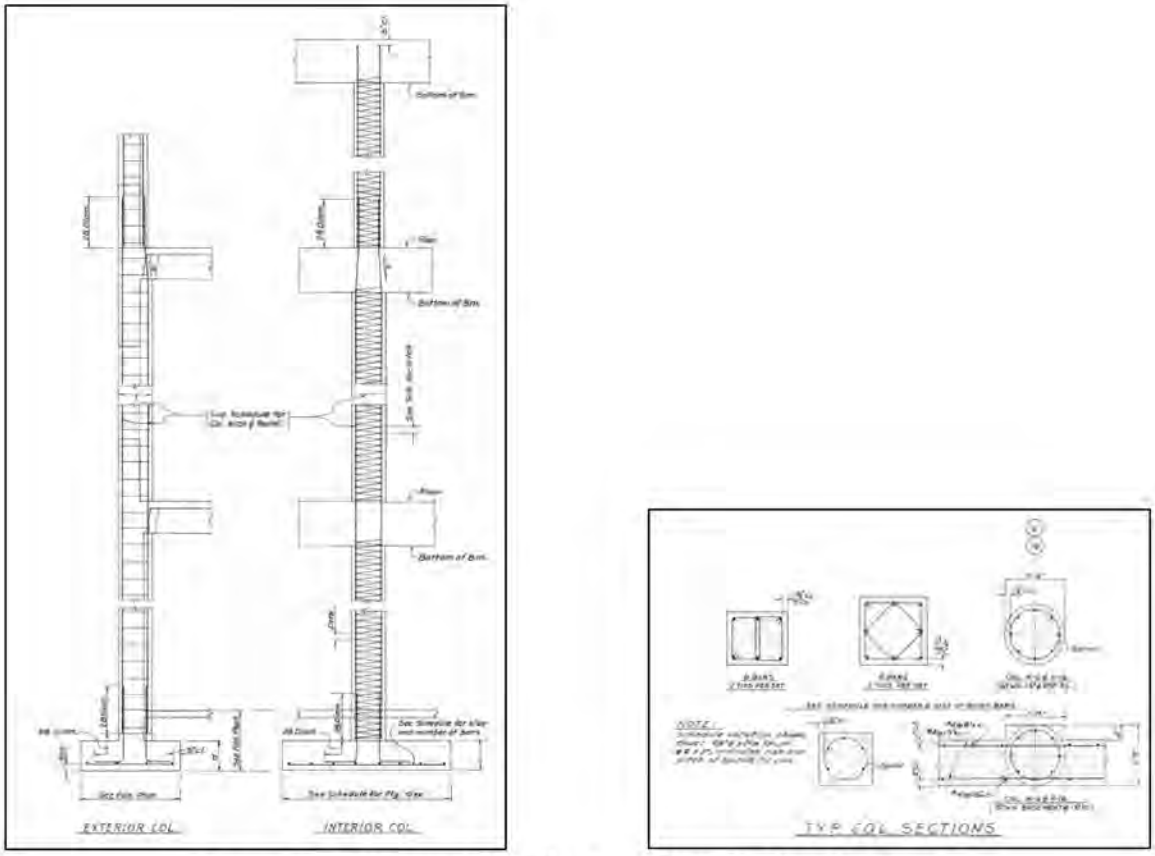


Figure 5 – Column Elevation and Details (North Tower)

2.1.2 South Tower and Elevator Tower

Basis:	Original Architectural and Structural design drawings (dated 1967); Site geotechnical investigation report [Converse Consultants, 2016]; Seismic Evaluation Report [NYA, 2018]; Visual site survey by R. Imani PhD, PE, SE of ImageCat on 8/11/2021.
Architect:	Kalionzes, Klingernan Architects, Los Angeles, CA.
Structural Engineer:	Henry M. Layne, S.E.
Geotechnical Engineer:	The original Geotechnical Engineer is unknown, but the Architectural drawings reproduce soil borings for the site.
Year Built:	1967
Design Code:	The 1964 Edition of the Uniform Building Code (UBC) assumed based on the year of construction. The Manual of Standard Practice for Reinforced Concrete Construction, Western Concrete Reinforcing Steel Institute is cited for concrete construction. The AISC Code (1963) is cited for steel construction.

Height:	4-story with a roof-top mechanical penthouse and 1 basement level.
Materials:	Concrete has 28-day compressive strength (f'c) of 2,500 psi for slab-on-grade and foundations, and 3,000 psi for all other elements. Reinforcing steel conforms to intermediate grade bar, with deformations per ASTM A305. Structural steel conforms to ASTM A53, Grade B for pipe columns and A36 for others.
Foundations:	Reinforced concrete spread footings, continuous strip footings and a 5" thick slab-on-grade.
Gravity System:	One way reinforced concrete slab spans over reinforced concrete pan joists resting on reinforced concrete girders that are supported by reinforced concrete columns. These elements transfer the loads down to reinforced concrete foundations.
Lateral System:	Reinforced concrete floor slabs act as rigid diaphragms, collecting and redistributing lateral forces to reinforced concrete shear walls in the east-west direction, and moment resisting frames (deep spandrel beams connected to columns) in the north-south direction of the South Tower. These elements transfer the loads down to reinforced concrete foundations. The elevator tower has a 3" seismic gap with the North and South Towers, with concrete shear walls around its perimeter that carry lateral loads to foundations.
Remarks:	Reinforced concrete shear walls are 10" thick (12" thick in the basement) with 2 layers of vertical (#4 bars spaced at 18" on center) and horizontal (#4 bars spaced at 16" on center) reinforcement. Reinforced concrete columns have rectangular sections of various sizes, with #7, #8 or #9 vertical bars and #4 ties spaced at 4 to 10 inches on center for columns on exterior lines. Interior columns have #3 ties spaced at 4 to 10 inches on center. Insufficient transverse reinforcement and lack of ductile detailing -- especially for the interior columns -- may lead to brittle shear failures when subjected seismic lateral movement (i.e., inter-story drift). Deep spandrels typically have #4 ties spaced at 12 inches on center (limited cases were seen with double #4 ties at 12 inches on center). These spandrels create captive columns along the east and west side the building that are prone to brittle shear failure during a seismic event. The roof-top mechanical penthouse has reinforced concrete shear walls around its perimeter. The building has vertical irregularity deficiency in parts of the lateral load resisting system where discontinuous shear walls are supported by beams or columns of lower floors (e.g., penthouse shear walls supported by roof beams and a column at the basement along the north

side of the building supporting another discontinuous shear wall). This condition may lead to additional seismic damage and overstress in the supporting members.

Condition: Fair to Good.

Architectural Notes: Exterior walls have painted concrete surfaces. The building has a built-up roof system.

Equipment Notes: Various types of equipment were observed to be well-anchored (HVAC units on roof, supply fans in roof-top pent-house, water heaters, elevator machinery, etc.)

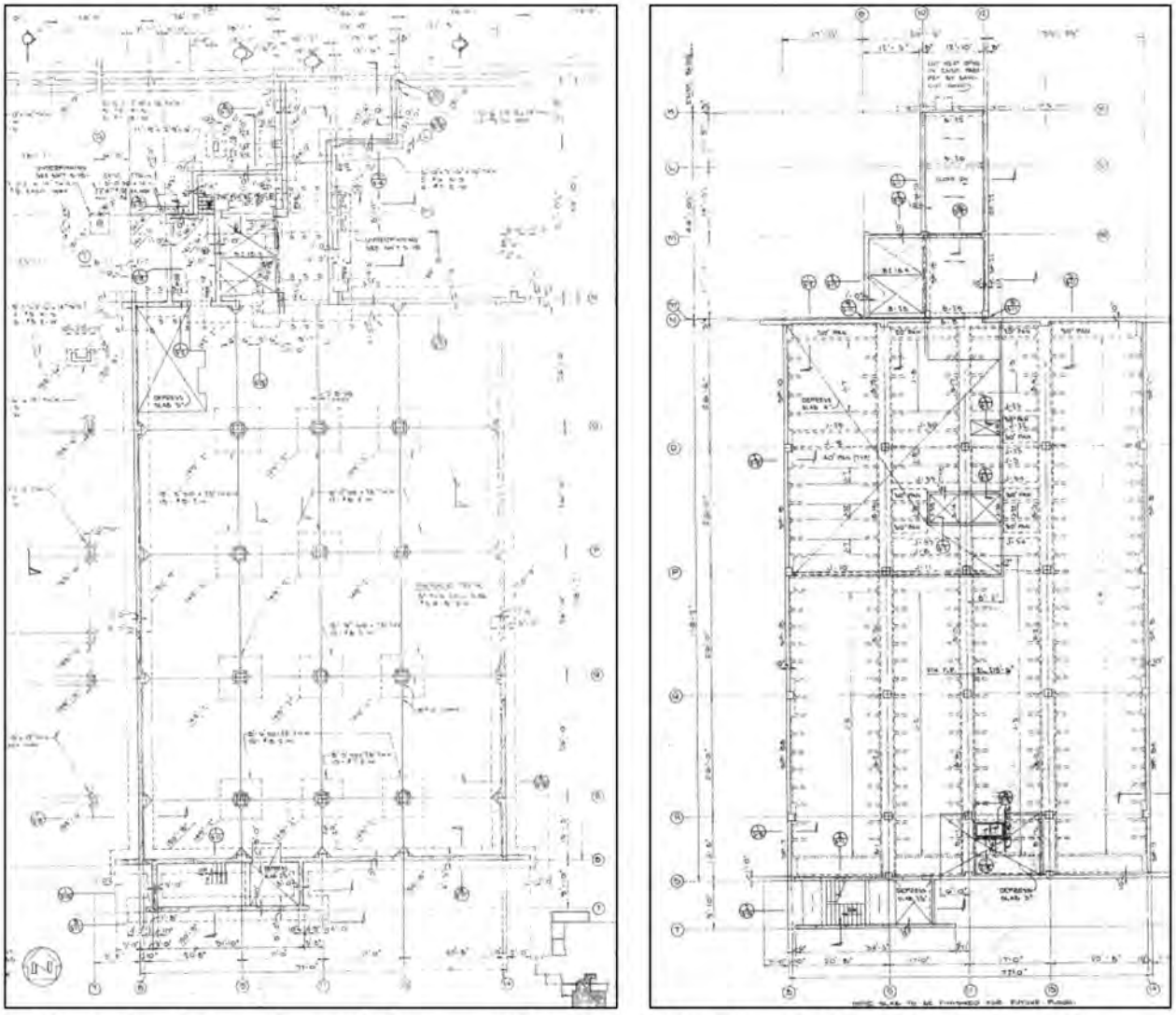


Figure 6 – Foundation and Basement Plan (Left), Roof Level Plan (Right) (South Tower and Elevator Tower)

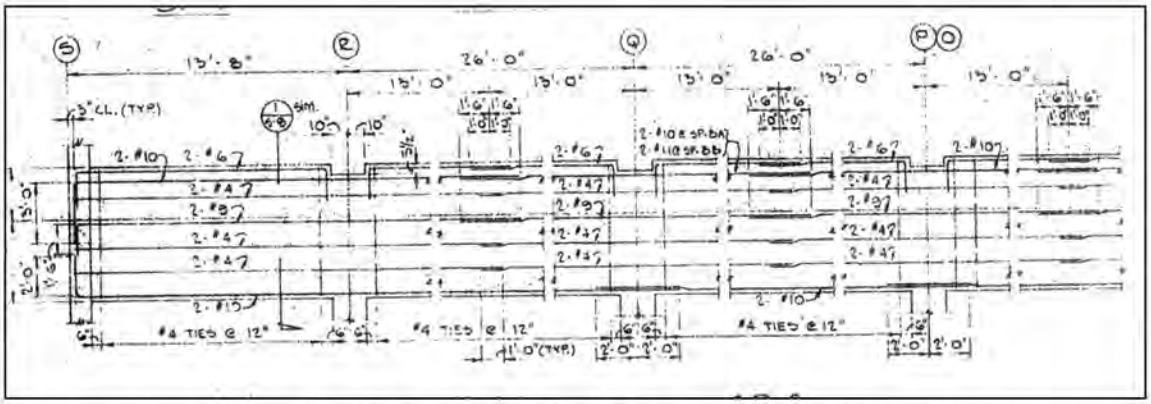


Figure 7 – Typical Spandrel Elevation (South Tower)

2.2 Additional Site Visit Notes

On August 11, 2021, R. Imani, Ph.D., P.E., S.E. of ImageCat conducted a visual survey of the 514 North Prospect building to observe current configuration, conditions, and usage. Dr. Imani met with Ms. Valerie Lee (Administrative Services Manager, BCHD) and a member of maintannce staff to walk the perimeter and inside of the buildings as well as on the roofs and in major equipment areas.

The site is generally flat. The exterior is mainly painted concrete surfaces and appears to be in good condition. The equipment at site is mostly at the same age as the buildings (with some new replacements) and appear to be anchored. These include HVAC units on the roof, supply fans and elevator machinery inside the mechanical penthouses, diesel fueled generators, transformers and other electrical panels inside rooms in the basement. Other equipment is located inside a separate building referred to as the Central Plant (located north-west of the North Low-Rise Building), which is not part of the scope for this study.

The buildings are in overall fair to good condition. Signs of age were observed, but no significant visible structural damage. Some rusting was visible on the exposed steel elements and anchorage material. The buildings are equipped with fire alarm and sprinkler systems. The main gas supply pipe observed outside the buildings is not equipped with an automatic earthquakle shut-off valve.

2.3 Building Stability and Qualitative Damage Discussion

All three structures (i.e., the North Tower, South Tower, and Elevator Tower) have complete and gravity load-carrying and lateral force-resisting systems. The North Tower was designed under the 1955 Uniform Bulding Code (UBC). The South and Elevator Towers were most probably designed under the 1964 edition of UBC. Both of these design codes pre-date the 1976 edition of UBC and, in addition to having a general seismic strength deficiency, can be classified in the non-ductile concrete structures, which are prone to brittle failure in seismic events due to lack of ductile detailing in various structural elements.

ImageCat has not performed structural calculations or developed detailed structural engineering models of the buildings. Instead, we have relied on the seismic evaluation performed by Nabih

Youssef Associates as documented in their report dated 2018. Their evaluation followed ASCE 41 methods, and included structural calculations and computer modeling.

Based on our review of the design documents and discussions with Engineers from NYA:

- In the North Tower, two columns along the north side of the building at level 2 are also supporting a discontinous shear wall. The elements supporting discontinous walls (i.e., beams, columns and diaphragm) can get overstressed during seismic events. Larger openings at first floor for some of the shear walls in the north-south direction may also lead to overstress in the shorter wall segments and a general lack of seismic strength in this floor. Captive columns created by deep spandrel beams along the north and south sides of the building are prone to brittle shear failure under seismic loading. The North Tower also has a vertical irregularity seismic deficiency caused by discontinuity of the shear walls around the roof-top penthouse, which are supported by roof-level beams.
- The South Tower has similar shear wall discontinuity issues (beams at roof level and a column in the basement are supporting shear walls above), and captive columns along the east and west sides of the building which are part of the moment frames as the only seismic load risisting elements in the north-south direction. These frames lack seismic strength and ductility and will be overstressed in seismic events.
- The elevator tower basically consists of a shear wall core that is continuous throughout its height to the foundations. Even though the level of seismic detailing is still below the minimums per current codes, the Elevator Tower should show generally adequate seismic performance.

Considering the deficiencies mentioned above, The North and South Towers in their current conditions may experience significant structural damage and do not meet the life safety requirements under the BSE-1E and BSE-2E hazard scenarios considered in the ASCE 41 standard for seismic evaluation of existing buildings.

In less technical terms, as these buildings undergo earthquake loads and experience lateral (sidesway) deformations, the lateral load resisting systems will get overstressed due to lack of strength. Overloading of these systems would lead to larger building deformations in ductile structures. However, since these buildings also lack ductility and cannot go through larger deformations, several elements including shear walls, columns and deep spandrel beams are expected to fail in a brittle manner (i.e., sudden breaking and failure rather than gradual deformation). For elements that are also carrying gravity loads, brittle failure from earthquake loads will lead failures in columns and other elements, resulting in partial or complete collapse. This translates to a significant life-safety concern. The significant damage or failure of structural systems is also combined by major damage to non-structural components (i.e., architectural finishes, ceilings, tiles, etc.) and building contents. A strong earthquake can lead to partial or complete collapse and loss of life, or result in damage that prompts the City to "red-tag" so that one or more of the buildings cannot be occupied. Even in less intense earthquake shaking, damage to non-structural components and contents can interrupt medical building operations for extended periods.

Estimated damage and collapse probablties (related to life-safety) under various hazard scenarios are studied in Section 3.

3. Seismic Risk Results

3.1 Brief Overview of Methods Used and Definitions

ImageCat performed seismic risk analysis based on the findings from review of the seismic hazards and the vulnerability assessment. In ImageCat's loss estimates, we have used ground motions from the 2014 USGS National Seismic Hazard Mapping Project. Structural damage models are adapted from "Code-Oriented Damage Assessment for Buildings" or CODA [Graf & Lee, EERI Earthquake Spectra Journal, February, 2009] and ATC-13, "Earthquake Damage Evaluation Data for California," [Applied Technology Council, Redwood City, CA, 1985 and ATC 13-1, 2002]. Seismic risk terminology follows guidelines issued by the American Society of Testing and Materials [ASTM E 2026-16a].

These models are semi-empirical, combining actual historical building performance data from past earthquakes, expert opinion, and other means to produce loss estimates for a particular class of structures. The models relate damage to seismic design parameters: building period (T), base shear (V/W or Cs), overstrength and ductility (through the R-factor). Engineering judgment is used to account for other building-specific structural features that affect structural performance (regularity, continuity, etc.). In this study, a Professional Engineer from ImageCat assessed the specific features of the building that affect seismic performance and adjusted the vulnerability models so that the risk results can reflect the particular building being examined.

Probable Loss (PL) describes the level of building damage from earthquake, expressed as a fraction of the building replacement value, having a stated probability of exceedance within a given exposure period. Alternatively, a level of earthquake damage having a stated return period. Probable Loss is found by considering all levels of earthquake hazard that may occur for the site in question, the building damage associated with each hazard level, and the variability of building damage within each hazard state. ImageCat recommends 'Probable Loss' (PL) as the best index of risk, since it relates loss directly as a function of probability.

3.2 Loss Estimates and Implications for Various Planning Alternatives

3.2.1 Maintain Status Quo – No Project to Be Planned or Executed (ALT 1)

Table A presents the probablistic seismic hazard intensities that have been used as input for the seismic risk assessment process for the buildings, examining time horizons of 3, 5, 10, 20, and 50 years. Each row in Table A provides various measures of intensity for a given probabilistic seismic hazard scenario. The intensity measures include Peak Ground Acceleration (PGA), the short-period (0.2 second) spectral acceleration (Ss), and the 1-second spectral acceleration (S1), all in units of g, where 1.0g is equal to the acceleration due to gravity.

Tables B and C below provide estimates of seismic risks for the buildings (i.e., North and South Towers) in their current condition, with no further actions taken. These estimates include building damage (a range of PL values as percentage of the total building replacement cost), downtime (a rough range of days to return to full operations), and probability of collapse (relevant to life-safety concerns). Results provided in each row only have a 10% probability of exceedance (i.e., becoming worse) during the period of considered exposure (i.e., 3, 5, 10, 20, and 50 years).

The ranges for the results attempt to indicate the level of uncertainty that should be considered for risk estimations of this type with complexities in characterization of both the seismic hazard and building vulnerability parameters.

Results are presented separately for the North and South Towers. As mentioned in the previous sections, even though the level of seismic detailing for the Elevator tower is still below the minimums per current design codes, it should generally provide adequate seismic performance due to the presence of continous shear wall core around its perimeter. The North and South Towers comprise the majority of value for the property and the major seismic deficiencies. As such, decisions for planning alternatives should be made according to results from the two towers.

Table A – Probabilistic Seismic Hazard Intensities

Seismic Hazard Scenario	PGA	Sa(0.2s)	S1
10% Probability of Exceedance in 3 Years	0.104g	0.265g	0.113g
10% Probability of Exceedance in 5 Years	0.146g	0.367g	0.163g
10% Probability of Exceedance in 10 Years	0.223g	0.544g	0.260g
10% Probability of Exceedance in 20 Years	0.318g	0.760g	0.398g
10% Probability of Exceedance in 50 Years	0.473g	1.090g	0.662g

Table B - Seismic Risk Estimates for the North Tower

Seismic Hazard Scenario	PL (%)	Downtime (Days)	Probability of Collapse
10% Probability of Exceedance in 3 Years	11-13%	135-175	1-3%
10% Probability of Exceedance in 5 Years	17-20%	210-255	3-8%
10% Probability of Exceedance in 10 Years	26-34%	270-345	9-19%
10% Probability of Exceedance in 20 Years	37-48%	390-525	20-34%
10% Probability of Exceedance in 50 Years	51-65%	570-750	37%-55%

Table C - Seismic Risk Estimates for the South Tower

Seismic Hazard Scenario	PL (%)	Downtime (Days)	Probability of Collapse
10% Probability of Exceedance in 3 Years	6-10%	110-140	1-2.5%
10% Probability of Exceedance in 5 Years	12-16%	165-205	3-7%
10% Probability of Exceedance in 10 Years	21-28%	255-330	8-16%
10% Probability of Exceedance in 20 Years	31-42%	350-465	18-30%
10% Probability of Exceedance in 50 Years	45-57%	510-690	35-49%

The 'status quo' alternative presents no upfront (immediate) costs or loss of service and income to BCHD, such as those that would result from demolition or retrofit construction. However, this exposes BCHD to significant levels of risk in terms of building damage and downtime losses and potential liability for loss of life, should an earthquake occur. **The building damage, downtime, and probability of collapse estimates with 10% probability of exceedance in the next 3 to 5 years are basically close to what would be expected, and deemed acceptable by most commercial lenders and institutional owners, from new buildings over a full lifetime (i.e., a 50-year exposure period).** Appendix E provides additional information on the objectives of seismic design codes and the corresponding acceptable risk. Appendix F provides information on common seismic risk criteria followed by commercial real estate lenders and institutional owners.

Beyond the next 3-5 years, the risk picture is different. Risk results presented for exposure periods of 10 to 50 years are significantly high, with probabilities of collapse that would likely be deemed unacceptable, especially for buildings that are used for assisted living, memory care, or other medical purposes.

3.2.2 Demolish Now (ALT 2)

This alternative would avoid any of the seismic risks described in the tables above. While a replacement building is being constructed (which may take 3 to 5 years), operations would need to be transferred to an alternative location, with the attendant costs and disturbance. The implications for this alternative include:

2a. Demolition costs - This includes permitting fees, basic demolition and disposal costs which can increase significantly if asbestos is confirmed to have been used during original construction, and debris hauling and landfill fees (if not included in the demolishing contractor's fees).

2b. Loss of service and income (temporarily or indefinitely) - As operations halt for demolition, and until a temporary off-site facility is procured or leased to transfer operations. Expected costs include:

2b.1 Initial setup and recurring annual costs of relocating BCHD's current operations (including community health and fitness programs which are separate from other private leases) to an off-site facility.

2b.2 Loss of annual rental income from various private leases currently active in the 514 N. Prospect building. In addition to loss of income, there may be additional implications for BCHD due to breaking of ongoing leases prior to their expiration dates, unless relevant exceptions were provided in the lease terms.

2b.3 If BCHD decides to construct a new replacement facility, costs of funding the planning and construction process would also apply to this alternative. These are described further in the next alternative.

3.2.3 Demolish in the Next 3-5 Years with Completion of a Replacement Facility (ALT 3)

This alternative balances near-term needs for service continuity with substantial progress toward seismic resilience. It presumes acceptance of the seismic risks described above for the next 3 to 5 years. Construction of a new facility could commence as the existing buildings continue current operations without loss in service or revenue, and with transfer of operations upon completion, followed by demolition and removal of the older buildings.

BCHD has already conducted preliminary studies on the market demand and financial feasibilty of constructing a new Assisted Living (AL) and Memory Care (MC) facility by considering two scenarios (i.e., a 5-story vs a 6-story building). The 6-story option was recommended to be pursued [Cain Brothers, 2020]. We note that those studies are preliminary and BCHD may conduct further reviews and updates based on the evolving market conditions, especially with regard to COVID 19.

If this alternative is pursued, Implications for BCHD include:

3a. No disruption of service or loss of income from the current activities as the existing buildings will remain operational until a coordinated transfer occurs upon completion of construction of the new facility.

3b. Construction of a new AL and MC facility (3 to 5 years):

3b.1 Project planning, financing (debt + equity from investors), design, and construction needs to be completed in the next 3-5 years, during which seismic risks for the existing buildings are acceptable.

3b.2 Since this is a new design project, BCHD would have the opportunity to set objectives for functionality (per current and future market demand), and for building performance, i.e., code-minimum or beyond current codes for Structural, Architectural, and for performance of Mechanical/Electrical/ Plumbing (M/E/P) equipment and medical service equipment. For instance, BCHD may wish to specify seismic performance criteria which is beyond minimum code requirement of achieving life-safety, leading to a design with a much-improved functional recovery time after a seismic event. This is highly recommended as relocation of residents of the AL and MC facilities can become extensively challenging post event. Having a higher seismic rating can also make the new facility attractive in a highly seismic area.

3b.3 BCHD will need to plan for a coordinated transfer of current operations to the new facility while minimizing potential disruptions. This includes operations run by BCHD or any long-term leases for tenants that would need to be transferred to the new facility.

3c. Demolition costs to remove the older building (similar to item 2a above).

3.2.4 Seismic Retrofit of the Existing Buildings (ALT 4)

Due to the complexities of the seismic deficiencies in these buildings, an effective retrofit design may require large portions or all of the buildings to be vacated during construction. As such, even though the cost of retrofit may be lower than cost of construction for a new replacement facility, much or all of the costs associated with relocation of current operations to another location may be incurred as for alternative 2 (i.e., demolish now). Further, there are limits to the improvements in seismic performance that can be achieved through retrofit at acceptable cost.

BCHD engaged NYA to conduct a seismic evaluation of the existing 514 N. Prospect building. NYA identified several seismic deficiencies for the North and South Towers, and provided a list of recommended seismic retrofit items. These recommendations were "conceptual" and intended to describe scope for rough order-of-magnitude cost estimation purposes [NYA, 2018]. According to ImageCat's conversations with BCHD, Cain Brothers conducted a financial feasibility study for the seismic retrofit alternative, using cost estimations for the retrofit project that were provided by CBRE based on NYA's recommendations. Considering retrofit costs and other financial information related to BCHD's current and potential future operations and revenue, Cain Brothers concluded that the seismic retrofit alternative is not financially feasible [Cain Brothers, 2020]. ImageCat is not in a position to verify the accuracy of the retrofit cost estimates and has asked BCHD to share additional documents with NYA, so they can (if desired) verify that current cost estimates reasonably represent

NYA's list of recommended retrofits and the incidental costs that would be incurred. These estimates should also need to be updated for current market conditions. However, ImageCat can qualitativly describe the following implications for the seismic retrofit alternative:

4a. Loss of service and income (temporarily until completion of the retrofit project), costs incurred due to transfer of operations to an offsite facility and other implications regarding breaking of on-going private leases (see items 2b.1, 2b.2 and 2b.3 above for more details as this is a shared implication with the "demolish now" alternative).

4b. Retrofit Project

4b.1 Financing, design and construction for the retrofit program needs to be completed in a reasonable time to reduce negative financial impacts. This was deemed to be financially infeasible by other consultants as mentioned above.

4b.2 Seismic retrofit projects are usually restricted from various aspects (time, costs, space) as they need to be done within the existing conditions of the building and still end up more cost-efficient compared to new construction. Given these restrictions, there are limits to the improvements that can be made to the structure's seismic performance. For the current 514 N. Prospect building, a cost-effective seismic retrofit can improve the life-safety performance up to a reasonable extent. However, attempts to achieve higher performance objectives that may be desired by BCHD (e.g., improving the performance to current code level or beyond) would lead to costs that are comparable or more than new construction.

4b.3 Seismic retrofit will improve structural performance, but the functionality of the building will be constrained by its original configuration, layout and systems of the 1950s and 1960s. This will not be in line with the demands of the current market. This challenge can only be addressed by combining the structural retrofit with a comprehensive renovation project, which could increase costs to surpass new construction. Making significant changes in various building elements would also trigger requirements to upgrade many or all of the M/E/P equipment in the building.

4c. Once the project is over, BCHD would need to increase current rental rates significantly for many years to reach the break-even point with regard to retrofit costs and the income lost during the retrofit project. The project will also significantly deplete BCHD's cash reserves.

4d. Finally, the retrofitted building would still expose BCHD to a higher level of risk in terms expected damage and downtime from earthquakes over the remaining life of the building, compared to reduced risk levels that can be achieved via new construction.

3.3 Summary and Recommendation

The following table summarizes the risks and implications described above for the four alternatives considered in this study.

Table D – Summary of Risks and Implications for Various Alternatives			
No.	**Description**	**Seismic Risks**	**Implications**
1	No Action – No Project to be Planned or Executed (Maintain Status Quo)	*Next 3-5 years:* See seismic risks described for alternative 3. *Next 10-50 years:* Estimated risks are significantly high, with probabilities of collapse likely deemed unacceptable, especially for buildings that are used for assisted living, memory care, or other medical purposes.	This alternative has no immediate costs, but will expose BCHD to significant (and likely deemed unacceptable) economic and life-safety risks due to future probabilistic seismic activity in the area.
2	Demolish Now	N/A	This alternative avoids seismic risks, but leads to loss of service and income (temporarily or indefinitely), as operations halt for demolition, and until a temporary off-site facility is procured or leased with the attendant costs to transfer operations.
3	Demolish in the Next 3-5 Years and Replace with New Buildings	The building damage, downtime, and probability of collapse estimates with 10% probability of exceedance in the next 3 to 5 years are generally consistent with those deemed acceptable by most commercial lenders and institutional owners, from new buildings over a full lifetime (i.e., a 50-year exposure period).	This alternative balances near-term need to maintain service with the long-term goal to improve seismic resilience. It presumes acceptance of the seismic risks described for the next 3 to 5 years. BCHD will have the opportunity to set objectives for building functionality (per current and future market demand), and performance (architectural, structural, and M/E/P). This option has been deemed financially feasible in preliminary studies by other consultants.
4	Seismic Retrofit of Existing Buildings	While the retrofit project is being planned and constructed, seismic risk levels are similar to those mentioned in alternative 3, except for the reduced life-safety concerns as the buildings will be vacated, leaving just the construction crew at site during the retrofit project. Seismic risks after the completion of the project will substantially reduce in terms of life-safety, with less likely reductions in the building damage and downtime categories due to the limitations of cost-effective retrofit projects.	Complexities of the retrofit construction will necessitate vacating the existing buildings, thereby requiring procurement of off-site temporary facilities with the attendant costs to transfer operations. There are limits to the improvements in seismic performance that can be achieved through retrofit at acceptable cost. The functionality of the building will also be limited by its original configuration from 1960s. This option has been deemed financially infeasible in preliminary studies by other consultants.

From the above table, it appears that Alternative No. 3, "Demolish in the Next 3-5 Years and Replace with New Buildings" provides the best choice among the four alternatives, consistent with BCHD's defined objectives.

4. Limitations

All work was performed by Professional Engineers (Civil and Structural). The scope of work performed included assessment of geologic hazards based on published maps, the recent geotechnical investigation report [Converse Consultants, 2016], and ground shaking models adapted by ImageCat from the U.S. Geological Survey.

We reviewed various available Architectural and Structural design drawings (original and expansion sets), and the Seismic Evaluation report [Nabih Youssef Associates (NYA), 2018]. We conducted multiple discussions with Engineers from NYA to obtain a detailed understanding of their findings on the structure's characteristics and current conditions and shared our observations. A Structural Engineer from ImageCat conducted a visual survey at site to assess existing configuration, conditions, and usage.

To examine seismic risks for the structures in their status quo conditions, ImageCat performed risk analysis using SeismiCat, ImageCat' earthquake risk tool for individual sites. Results include tables and curves relating the severity of the estimated probabilistic risk to various return periods (short- and long-term) along with corresponding information on building stability, and downtime.

ImageCat also qualitatively described the outcomes and implications of the other considered alternatives according to our understanding, conversations with BCHD, and review of various financial and feasibility studies conducted by other consultants [Cain Brothers, CBRE, 2020].

ImageCat did not design the buildings, and design and construction professionals bear responsibility for the structure. Additional design deficiencies may be revealed through detailed structural analysis and calculations -- beyond the scope of the current review. Our seismic risk findings assume that the construction will utilize good materials, conforming to the prevailing code and good practice. Additional risk (unexpected earthquake damage) may result if poor materials or construction practices are used, or if the completed construction deviates from the approved designs. Construction quality should be verified upon completion.

Seismic risk assessment is subject to many uncertainties – in the estimation of seismic hazards, and in estimating building performance given the seismic hazards. The models used reflect the current state of knowledge and its limitations.

ImageCat warrants that its services are performed with the usual thoroughness and competence of the consulting profession, in accordance with the current standard for professional services, in the location where the services are provided. No other warranty or representation, either expressed or implied, is included or intended in its proposals or reports.

- o O o -

We are pleased to have the opportunity to provide seismic risk consulting services to BCHD. Should you have any questions regarding the results of this seismic risk assessment, please email or call.

Sincerely,

ImageCat, Inc.

Reza Imani, PhD., P.E., S.E.
Manager, Structural Engineering & Risk Mitigation

William P. Graf, P.E. Civil
Vice President, Engineering

Attached:

A. Nabih Youssef Associates, March 27, 2018, "Seismic Evaluation of Beach Cities Health District 514 North Prospect Avenue & Central Plant Redondo Beach, CA"
B. Fault Descriptions
C. Earthquake Risk Glossary
D. Qualifications
E. Seismic Design Code Objectives
F. Commercial Real Estate Lender and Owner Criteria for Seismic Risk

Appendix A – NYA's Seismic Evaluation Report

Nabih Youssef Associates, March 27, 2018, "Seismic Evaluation of Beach Cities Health District 514 North Prospect Avenue & Central Plant Redondo Beach, CA"

SEISMIC EVALUATION
Of

Beach Cities Health District

514 North Prospect Avenue & Central Plant
Redondo Beach, CA

Prepared for:

Beach Cities Health District
514 North Prospect Avenue, 1st Floor
Redondo Beach, CA 90277



Prepared by:

Nabih Youssef Associates
Structural Engineers
550 South Hope Street, Suite 1700
Los Angeles, California 90071
NYA Job # 17171.00

March 27, 2018

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2.0 SEISMIC EVALUATION
- 2.1 Identified Deficiencies

3.0 RECOMMENDATIONS

1.0 BUILDING DESCRIPTION

The former hospital building at 514 North Prospect was originally constructed in 1958 and consists of a 4-story tower (referred to hereinafter as the north tower) and single-story extension to the north. The south tower and elevator tower were added in 1967 and each consists of 4-stories. The north tower, elevator tower, and south tower have a single story basement. There are seismic joints that structurally separate the north low rise, north tower, elevator tower and south tower into four discrete structures. The central plant is a stand-alone single-story building. Refer to Figure 1 for an aerial view of the project site.

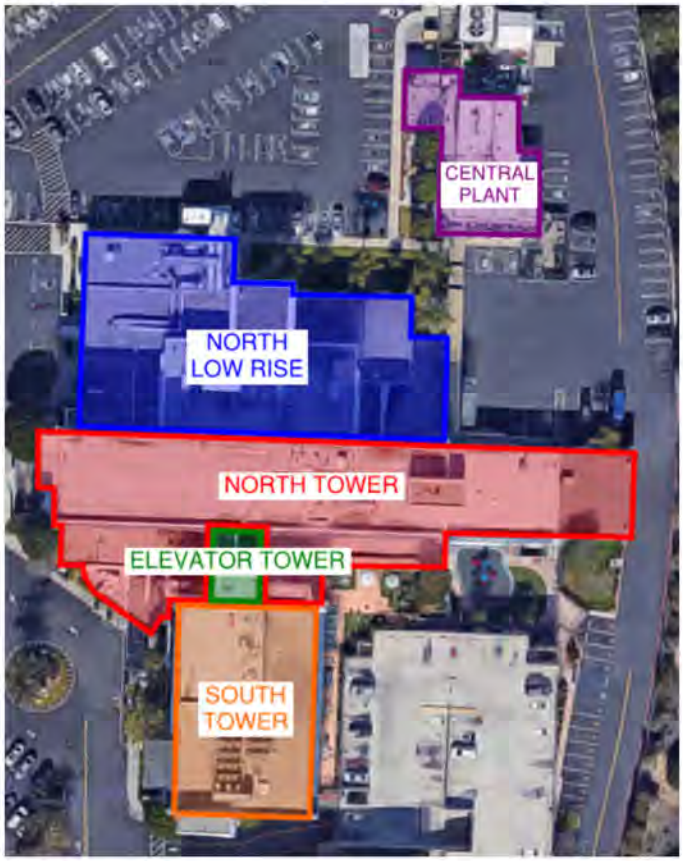


Figure 1 – Aerial View of 514 North Prospect and Central Plant

1.1 Gravity System

The gravity framing system for the north low rise, north tower, elevator tower, and south tower typically consists of concrete slabs 3-4 ½" thick supported by concrete joists and girders. The floor and roof framing is supported by concrete columns that extend down to the foundation.

The gravity framing system for the central plant consists of plywood sheathing at the roof supported by timber joists and girders. The timber girders are supported by steel pipe columns at the interior of the building and reinforced masonry walls along the perimeter.

1.2 Lateral System

The lateral force resisting system for the north tower consists primarily of concrete shear walls in both directions of the building. There are also deep concrete spandrels framing to concrete columns along the north and south sides of the building that act as moment frames (refer to figure 2). The floors and roof contain concrete slabs that form rigid diaphragms that distribute seismic induced forces to the walls and frames.



Figure 2 – View of South Side of North Tower

The lateral force resisting system for the east-west direction of the south tower consists of concrete shear walls located along the north and south sides of the building. In the north-south direction there are deep concrete spandrels framing to concrete columns (similar to the north tower) that act as moment frames. The floors and roof contain concrete slabs that form rigid diaphragms that distribute seismic induced forces to the walls and frames.

Both towers have a mechanical penthouse that sits on top of the roof that contains concrete shear walls around the perimeter. Most of the shear walls at both penthouses are discontinues and supported by concrete beams at the roof.

The lateral force resisting system for the north low rise building consists of multiple concrete shear walls in both directions of the building. The roof consists of a concrete slab that forms a rigid diaphragm that distributes seismic induced forces to the shear walls.

The lateral force resisting system for the elevator tower consists of concrete shear walls forming a core around the elevator that are continuous to the foundation.

The lateral force resisting system of the central plant consists of reinforced masonry shear walls around the perimeter of the building. The roof consists of a plywood diaphragm and anchors connecting the perimeter masonry walls to the timber framing (refer to figure 3).



Figure 3 –View of Central Plant

2.0 SEISMIC EVALUATION

A Tier 1 and deficiency only Tier 2 evaluation of the building's expected seismic performance was performed using ASCE 41-13, *Seismic Evaluation and Retrofit of Existing Buildings*. ASCE 41 is a national standard used to seismically evaluate existing buildings. The parameters used to for the evaluation are listed in Table 1. Assumed properties used in the evaluation were based on existing drawings and ASCE 41-13.

Table 1 – Evaluation Parameters

Performance Level	Life Safety Collapse Prevention
Seismic Hazard Level	BSE-1E (20% in 50 year event) BSE-2E (5% in 50 year event)
Level of Seismicity	High (S_{ds} > 0.5g and S_{d1} > 0.2g)
Building Type	C1 (Concrete Moment Frames) C2 (Concrete Shear Walls, Stiff Diaphragm) RM1 (Reinforced Masonry Bearing Walls, Flexible Diaphragm)
Soil Type	D
Seismic Parameters	$S_{XS,BSE-1E}$ = 0.762g $S_{X1,BSE-1E}$ = 0.419g $S_{XS,BSE-2E}$ = 1.192g $S_{X1,BSE-2E}$ = 0.660g

2.1 Identified Deficiencies

Based on the results of the analysis performed, extensive deficiencies were identified in both the north and south towers, and minor deficiencies were identified in the central plant. No deficiencies were identified for either the north low rise or elevator tower.

The identified deficiencies in the north tower include the following:

- The concrete beams at the roof that support the discontinuous shear walls in the penthouse above are overstressed in shear and flexure.
- Portions of the roof diaphragm are overstressed in shear.
- Two columns along the north side of the building at level 2 that support a discontinuous shear wall are overstressed.
- The deep concrete spandrels along the north and south sides of the building create captive columns that are susceptible to shear failure in a seismic event.
- Three concrete shear walls in the north-south direction have additional openings at the first and/or basement levels that result in the remaining wall being overstressed.

The identified deficiencies in the south tower include the following:

- The concrete beams at the roof that support the discontinuous shear walls in the penthouse above are overstressed in shear and flexure.
- One column along the north side of the building at the basement level that supports a discontinuous shear wall is overstressed.
- Many interior concrete columns have insufficient confinement reinforcement for seismic drift induced forces (i.e. deformation compatibility).
- The deep concrete spandrels along the east and west sides of the building create captive columns that are susceptible to shear failure in a seismic event. These frames are the only existing lateral system in the north-south direction of the south tower and are highly overstressed in flexure and shear.

The identified deficiencies in the central plant include the following:

- The existing ties between the perimeter reinforced masonry walls and plywood diaphragm are deficient.

3.0 RECOMMENDATIONS

Recommended seismic improvements have been developed based on the assessment of the existing building seismic performance using ASCE 41-13 criteria. The proposed strengthening is conceptual and is intended to identify representative scope for rough order of magnitude estimate of cost.

Recommended seismic strengthening for the north tower includes:

- Strengthen concrete beams below the discontinuous penthouse walls.
- Strengthen overstressed portions of the roof diaphragm.
- Strengthen columns at discontinuous shear walls.
- Slot cut the deep spandrel beams along the north and south sides of the building.
- Infill select openings in the north-south concrete shear walls.
- Strengthen foundations below the infilled concrete shear walls.

Recommended seismic strengthening for the south tower includes:

- Strengthen concrete beams below the discontinuous penthouse walls.
- Add new braced frames in the north-south direction. Two bays of braced frames at both the east and west sides of the building (four bays total) just outboard of the existing concrete frames recommended.
- Strengthen columns at new braced frames.
- Add new collectors along the east and west sides of the building to drag load into the new braced frames.
- Add fiber reinforced polymer (FRP) wrap around interior concrete columns.
- Slot cut the deep spandrel beams along the east and west sides of the building.
- Strengthen foundations below new braced frames.

Recommended seismic strengthening for the central plant includes:

- Add new Simpson straps and blocking at the roof to brace the perimeter reinforced masonry.

Appendix B – Fault Descriptions

Redondo Canyon Fault
Palos Verdes Fault
Compton Thrust Fault
Newport-Inglewood-Rose Canyon Fault Zone

Quaternary Fault and Fold Database of the United States

Redondo Canyon fault (Class A) No. 130

Citation Treiman, J.A., compiler, 1998, Fault number 130, Redondo Canyon fault, in Quaternary fault and fold database of the United States:

Synopsis There is little published information on this fault; it may receive some slip transferred from the Palos Verdes fault zone and is interpreted to accomodate uplift of the Palos Verdes Hills; location and activity based on marine geophyisical interpretation.

Name comments First located by Emery (1960 #6130) and later by Yerkes and others (1967 #6132) along axis of canyon; later work by Nardin and Henyey (1978 #6131) identified the fault as a reverse fault on the south flank of the canyon rather than along the canyon axis; to the east the fault the joins Palos Verdes fault zone [128].

Fault ID: Refers to number 436 (Redondo Canyon fault) of Jennings (1994 #2878); Fault ID 8 of Hecker and others (1998 #6118); number 36 (Redondo Canyon fault) of Ziony and Yerkes (1985 #5931).

County(s) and State(s) LOS ANGELES COUNTY, CALIFORNIA (offshore)

Physiographic province(s) PACIFIC BORDER (offshore)

Reliability of location Poor

Compiled at 1:100,000 scale.

Comments: Inferred trace digitized at 1:100,000 from photo-enlargement of original 1:250,000 map (Vedder and others, 1986 #5971).

Geologic setting High-angle, down to the north, reverse fault separates Palos Verdes Hills structural block from the Santa Monica basin to the north; may absorb some dextral slip from Palos Verdes fault zone [128] or may transfer this slip further offshore.

Length (km) 12 km.

Average strike N90°WW

Sense of movement Reverse

Comments: Described as a north-dipping normal fault by earlier workers.

Dip Direction S Comments: High-angle dip is assumed as summarized by Hecker and others (1998 #6118).

Paleoseismology studies

Geomorphic expression Fault zone may have provided structural control for Redondo Canyon (submarine), but fault is identified along south flank of canyon rather than along canyon axis; scarps and warps also summarized by Hecker and others (1998 #6118) from Nardin and Henyey (1978 #6131); in a larger sense, the Palos Verdes Hills may represent uplift of the south side of the fault.

Age of faulted surficial deposits Presumed Holocene sediments (Nardin and Henyey, 1978 #6131; Vedder and others, 1986 #5971)

Historic earthquake

Most recent prehistoric deformation latest Quaternary (<15 ka)

Comments: Timing of most recent movement based on marine geophysical interpretation.

Recurrence interval

Slip-rate category Between 0.2 and 1.0 mm/yr

Comments: Slip rate is inferred to be similar to the vertical uplift rates for Palos Verdes fault zone [128].

Date and Compiler(s) 1998

Jerome A. Treiman, California Geological Survey

Palos Verdes fault zone, Palos Verdes Hills section (Class A) No. 128b

County(s) and State(s) LOS ANGELES COUNTY, CALIFORNIA

Physiographic province(s) PACIFIC BORDER

Reliability of location Poor

Compiled at 1:250,000 scale.

Length (km) This section is 12 km of a total fault length of 73 km.

Average strike N57°W (for section)

Sense of movement Right lateral

Dip 50° SW. to 90°

Historic earthquake

Most recent prehistoric deformation late Quaternary (<130 ka)

Slip-rate category Between 1.0 and 5.0 mm/yr

Compton thrust fault (Class A) No. 133

Citation	Fisher, M.A., and Bryant, W.A., compilers, 2017, Fault number 133, Compton thrust fault, in Quaternary fault and fold database of the United States
Synopsis	The Compton thrust fault (blind) extends below the western Los Angeles Basin, lying entirely within Mesozoic metamorphic basement (Catalina Schist) (Shaw and Suppe, 1996). Most of the thrust fault is a ramp that rises to the southwest from depths as great as 10 km up to 5 km. The ramp connects the Central Basin Decollement, a thrust flat below the Los Angeles Basin, with shallower parts of the thrust fault near its tip below the Palos Verdes Peninsula. Leon and others (2009) identified 6 events in the past 14 ka, established event dates, and estimated a thrust fault slip rate of 1.2+0.5, -0.3 mm/yr.
Name comments	Variously referred to as the Compton Thrust, Compton ramp, Compton thrust ramp, and Compton thrust system by Shaw and Suppe (1996). Also referred to as the Compton-Los Alamitos trend in reference to the growth fold above the Compton ramp.
County(s) and State(s)	LOS ANGELES COUNTY, CALIFORNIA
Physiographic province(s)	PACIFIC BORDER
Reliability of location	Compiled at 1: scale. *Comments:* Location of fault from Qt_flt_ver_3-0_Final_WGS84_polyline.shp (Bryant, W.A., written communication to K.Haller, August 15, 2017) based on geometric representation of Compton Thrust Fault ramp is from Community Fault Model (Plesch and others 2007).
Geologic setting	The Compton thrust fault is one several blind thrust faults that pose an earthquake hazard to urban Los Angeles. Miocene through Quaternary sedimentary rocks within the Los Angeles Basin and the upper part of their Mesozoic basement are transported upward and southwestward along the Compton thrust fault.
Length (km)	km.
Average strike	
Sense of movement	Thrust
Dip	0–28° NE. *Comments:* Fault is flat lying beneath offshore and coastal areas and dips 22° NE. east of the coastal zone (Shaw and Suppe, 1996; Leon and others 2009).
Paleoseismology studies	Site 133-1 – Stanford Avenue site by Leon and others (2009) involved the interpretation of high resolution seismic reflection lines and the excavation of ten 25–35 m deep, continuously cored boreholes along Stanford Avenue, Los Angeles. Leon and others (2009) identified as many as 6 discrete fold scarps associated with displacement along the Compton thrust fault ramp, and estimated a slip rate (thrust) of 1.2+0.5, -0.3 mm/yr.
Geomorphic expression	The fault does not extend to the ground surface, but Quaternary sediment apparently is flexed upward in the kink band associated with the Compton thrust ramp, indicating Quaternary activity (Shaw and Suppe, 1996). Leon and others (2009) identified Holocene fluvial deposits deformed within back-limb fold structure during uplift events associated with displacement along the Compton thrust fault ramp. Ages, based on calibrated radiocarbon dates from 30 humic, charcoal, and bulk soil samples indicate sediment accumulation over the past 14 ka.
Age of faulted surficial deposits	
Historic earthquake	
Most recent prehistoric deformation	latest Quaternary (<15 ka) *Comments:* Possibly inactive during the late Quaternary (since about 1.5 Ma, Foxall, 1997); however, the Palos Verdes fault [128] is kinematically related to the Compton thrust fault and the Holocene activity along the Palos Verdes fault could suggest the underlying Compton thrust fault was active in the Holocene as well.
Recurrence interval	Leon and others (2009) identified six paleoseismic events at the Stanford Avenue [133-1] site: Event 1: 0.7–1.75 ka Event 2: 1.9–3.4 ka Event 3: 5.6–7.2 ka Event 4: 5.4–8.4 ka Event 5: 10.3–12.5 ka Event 6: 10.3–13.7 ka
Slip-rate category	Between 0.2 and 1.0 mm/yr *Comments:* Shaw and Suppe (1996) estimated long term slip rate of 1.4±0.4 mm/yr. Leon and others (2009) calculated average Holocene (past 14 ka) slip rate of 1.2+0.5/-0.3 mm/yr using cumulative thrust displacement of 16.9+7.5/-6.9 m derived from dip of 28±3° dip of Compton thrust fault ramp.
Date and Compiler(s)	2017 Michael A. Fisher, U.S. Geological Survey William A. Bryant, California Geological Survey

Newport-Inglewood-Rose Canyon fault zone, south Los Angeles Basin section (Class A) No. 127b

Synopsis

General: Data on this fault zone is variable. Fault locations onshore and in some limited offshore areas are generally well located. The large central portion of the fault zone is offshore and less well defined. Urbanization in the San Diego area has also somewhat limited the accurate location of some of the fault strands. The northern onshore portion is demonstrably Holocene based on numerous geotechnical studies as well as the historic Long Beach earthquake. The southern onshore portion, through San Diego, is also demonstrably active based on geotechnical and research studies. The intermediate offshore portion is presumed Holocene based on sparse evidence of displacement of presumed young Holocene sediments offshore as well as its continuity to the better-defined onshore sections. There are three detailed study sites along the fault zone. Grant and others (1997 #1366) reported evidence for 3–5 earthquakes in the past 11.7 ka, but stated that the recurrence interval varied from 1,200 yr to 3,000 yr. Slip rate is not fully constrained, but appears to be approximately 1.0±0.5 mm/yr in the north, increasing to 1.5±0.5 mm/yr in the south.

Sections: This fault has 7 sections. Section designations after Fischer and Mills (1991 #6468) who designated three segments offshore, two segments onshore south of La Jolla and one southern segment within the Los Angeles basin (thereby implying a northern, 7th segment as well). Sections were distinguished based on asperities (bends), steps and seismicity. The division of the Los Angeles basin part of the fault zone into two segments is based on slight differences in geometry (discussed by several workers, including Wright (1991 #5950), seismicity differences (Hauksson, 1987 #6475), and the subsurface extent of the 1933 Long Beach earthquake rupture (Wesnousky, 1986 #5305; Hauksson and Gross, 1991 #6476). Fischer (1992 #6467) designates one additional segment offshore. Working Group on California Earthquake Probabilities (1995 #4945) and Petersen and others (1996 #4860) identify three sections: Newport-Inglewood, Newport-Inglewood offshore and Rose Canyon (the latter including offshore faults north to Oceanside).

Name comments

General: Entire fault zone referred to as Newport-Inglewood-Rose Canyon fault zone by Greene and others (1979 #6470). Newport-Inglewood fault: onshore structural zone first recognized as a zone of folding by Mendenhall (1905 #6488). Hamlin (1918 #6473) associated seismicity and faulting with the zone; first mapped and named by Taber (1920 #6491) as the Inglewood-Newport-San Onofre fault; called Newport-Inglewood fault by Hoots (1931 #5921). Eaton (1933 #6463) was first to suggest continuity to Rose Canyon fault in the San Diego area; offshore portion was called the South Coast Offshore fault by utility consultants (Southern California Edison Co. and San Diego Gas and Electric Co., 1972 #6490), and the South Coast Offshore Zone of Deformation by Woodward-Clyde Consultants (1979 #6496). Rose Canyon fault: Fairbanks (1893 #6466) suggested presence of fault and Ellis and Lee (1919 #6465) were the first to show part of the fault on a map. Hanna (1926 #6474) referred to the Soledad Mountain fault; Hertlein and Grant (1939 #6477) were the first to refer to the Rose Canyon fault; Kennedy (1975 #6478) and Kennedy and others (1975 #6480) mapped the fault in greater detail. See sections 127f and g for additional fault strands.

Section: Section name from Fischer and Mills (1991 #6468); includes Cherry-Hill fault, Northeast Flank fault, Reservoir Hill fault, Seal Beach fault, and North and South Branch Newport-Inglewood faults; North Branch fault has also been called the High School fault; section extends southeastward from the Dominguez Hills to Newport Beach.

Fault ID: Refers to numbers 434 (Potrero, Inglewood and Avalon-Compton faults), 439 (South Branch, Newport-Inglewood fault zone), 440 (North Branch, Newport-Inglewood fault zone), 441 (Cherry-Hill, Reservoir Hill and Seal Beach faults), 465 (Newport Inglewood-Rose Canyon fault zone, offshore), 487 (Mission Bay fault), 490 (Coronado fault, offshore), 490A (Spanish Bight fault, offshore), 491 (Rose Canyon fault zone), 492 (Old Town fault), and 493A (Silver Strand fault, offshore) of Jennings (1994 #2878). Also refers to numbers 30 (Newport-Inglewood, north section) and 31 (Newport-Inglewood, south section) of Hecker and others (1998 #6118), and to numbers 25 (Inglewood fault), 26 (Potrero fault), 27 (Avalon-Compton fault), 28 (Cherry-Hill fault), 29 (Reservoir Hill fault), 30 (Newport-Inglewood North Branch), 31 (Newport-Inglewood, South Branch), and 32 (Faults offshore of San Clemente) of Ziony and Yerkes (1985 #5931).

County(s) and State(s)

LOS ANGELES COUNTY, CALIFORNIA
ORANGE COUNTY, CALIFORNIA

Physiographic province(s)

PACIFIC BORDER

Reliability of location

Good
Compiled at 1:24,000; 1:31,680; 1:48,000 and unspecified scale.

Comments: Location of fault from Qt_flt_ver_3-0_Final_WGS84_polyline.shp (Bryant, W.A., written communication to K.Haller, August 15, 2017) attributed to Bryant (1985, 1988), California Department of Water Resources (1966), Guptil and Heath (1981), Morton and Miller(1981), and Poland and others (1956).

Geologic setting

This fault zone is a major structural element within the Peninsular Ranges. Both onshore, to the north, and in the offshore region the fault zone separates contrasting Mesozoic basement terrane-Catalina Schist on the west and metasediments, intrusives and volcanics to the east (Yerkes and others, 1965 #5930).

The onshore Los Angeles basin reach of the fault zone is marked by a northwesterly trending line of generally en echelon anticlinal folds and faults that extends 40 miles from Newport Mesa to the Cheviot Hills along the western side of the Los Angeles Basin (Barrows, 1974 #6460); the zone is tentatively extended northward to the Santa Monica [101] and Hollywood [102] faults by Wright (1991 #5950). The onshore structural zone is an important petroleum-producing region.

The offshore reach of the fault zone continues southeastward until offshore of Oceanside where it bends and steps and continues on a more south-southeast trend, paralleling the coastline. The Rose Canyon fault [127e, 127f] comes onshore at La Jolla and is characterized by zones of compression and extension associated with restraining and releasing bends in the faults. The fault zone is locally more than 1 km wide and is composed of both dip-slip and strike-slip en echelon faults that together extend from La Jolla Cove 50 km to San Diego Bay and beyond on the south (Treiman, 1993 #6494).

Length (km)

This section is 34 km of a total fault length of 209 km.

Average strike

N51°W (for section) versus N29°W,N27°W,N31°W (for whole fault)

Sense of movement

Right lateral

Comments: Legg and Kennedy (1991 #6486) report pure dextral strike slip; supported by seismicity as reported by Hauksson (1990 #6879).

Dip Direction

NE; SW

Comments: Dip assumed by Petersen and others (1996 #4860); generally high-angle to near vertical, but locally dips either NE or SW (Wright, 1991 #6878).

Numerous consulting studies (on file with the California Geological Survey, Alquist-Priolo Earthquake Fault Zoning project) have addressed location and recency of faulting.

Paleoseismology studies

Site 127-2: Huntington site by Grant and others (1997 #1366) involved drilling and analyzing 72 CPT borings, spaced between 7 to 30 m apart across the North Branch fault just northwest of Huntington Mesa. Grant and others (1997 #1366) identified at least three and possibly five surface-rupturing earthquakes in the past 11.7 ka. Dates of the events were established using 14C dates from samples collected from continuously cored borings.

Geomorphic expression

Large-scale features include a line of hills underlain by en echelon anticlinal folds and faults; small- to intermediate-scale features include scarps, pressure ridges, deflected drainages, linear drainages, closed depressions and troughs (Bryant, 1988 #6461).

Age of faulted surficial depos

Holocene alluvial deposits and soils; late Pleistocene Inglewood Formation; late Pleistocene marine and non-marine terrace deposits; Pleistocene Lakewood Formation (Bryant, 1988 #6461).

Historic earthquake

latest Quaternary (<15 ka)

Comments: Timing of most recent paleoevent is poorly constrained. Historic events (without surface rupture) include 1933 M6.3 Long Beach earthquake and perhaps 1812 (12/08/1812); no details available on individual or most recent pre-historic events.

Most recent prehistoric defor

1,200–3,000 yr

Comments: Recurrence interval reported by Freeman and others (1992 #6469) and Grant and others (1997 #1366). Grant and others (1997 #1366) recognized at least three and as many as five surface-rupturing earthquakes in the past 11.7 ka at the Huntington site. The two oldest Holocene events occurred within approximately 1,200 yr of each other, but at least 3,000 yr passed between early and middle Holocene events.

Recurrence interval

Between 1.0 and 5.0 mm/yr

Comments: 0.5 mm/yr long-term horizontal geologic slip-rate derived from offset facies in oil well logs (Freeman and others, 1992 #6469); Wesnousky (1986 #5305) and Working Group on California Earthquake Probabilities (1995 #4945) assume 1.0 mm/yr; Clark and others (1984 #2876) reported 0.6–1.2 mm/yr vertical slip rate at Bolsa Chica Mesa which may not be representative of total slip on the deeper seismogenic structure.

Slip-rate category

1999

Date and Compiler(s)

Jerome A. Treiman, California Geological Survey
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Appendix C – Earthquake Risk Glossary

Acceleration	The rate of change of velocity. As applied to strong ground motions, the rate of change of earthquake shaking velocity of a reference point. Commonly expressed as a fraction or percentage of the acceleration due to gravity (g), wherein g = 980 centimeters per second squared.
Active Fault	An earthquake fault that is considered to be likely to undergo renewed movement within a period of concern to humans. Faults are commonly considered to be active if they have moved one or more times in the last 10,000-11,000 years, but they may also be considered potentially active when assessing the hazard for some applications even if movement has occurred in the Quaternary Period (2M years). See also *fault.*
Aggregate Loss Curve	Also known as risk curves. A curve that present risk severity (dollars lost, lives lost, injuries, days of business interruption, etc.) versus frequency or probability. The plots in this report show annual probability of exceedance as the Y-axis, and portfolio-wide loss ($) as the X-axis. The Y-axis (probability of exceedance) is also translated into average return period – the average time between loss levels of the same severity.
Alluvium	A soil type consisting of loosely compacted gravel, sand, silt, or clay deposited by streams.
Amplification	An increase in seismic wave amplitude as the waves propagate through certain soils, in sedimentary basins, or in certain topographic configurations (e.g. along ridge lines).
Average Annual Loss	The loss per annum due to hazards, calculated as the probabilistic loss contribution of all events. The expected annual loss is the expectation of the probability distribution of loss per annum, and under certain assumptions may be calculated as the probability-weighted average-of loss due to all possible hazard events.
Alquist-Priolo (A-P) Special Studies Zone	More recently known as Earthquake Fault Zone (EFZ). In California, these are defined areas surrounding active faults, as defined by the State Geologist, within which it is necessary to perform fault location studies in order to construct buildings for human occupancy. Buildings for human occupancy may not be constructed within a prescribed distance of the identified fault rupture trace. Details of the regulations are presented in Special Publication 42, published by the California Division of Mines and Geology (CDMG).
Attenuation	The rate at which seismic, wind, or water intensities decrease with distance from their sources or shoreline landing points.
Average (Expected) Annualized Loss	*See Average Annual Loss.*

Business Interruption (BI) Loss	Economic loss associated with loss of function of a commercial enterprise.
Cat Bond	Catastrophe Bond. An alternative risk financing instrument which exploits the capital markets for insurance capacity. A number of different forms exist. In a parametric Cat bond, investors purchase the bonds at a face value, and will receive principal and interest after a specified period, provided a defined event does not occur. The event is defined by objective parameter, determined by a neutral, authoritative third party. For an earthquake Cat bond, the event may be defined according to magnitude and epicenter location, and the degree of forfeiture by the bond investor typically varies according to a schedule of event thresholds and geographic bounds.
Damage	Physical disruption, such as cracking in walls or overturning of equipment (often used synonymously but erroneously with Loss).
Damping	The dissipation of energy in the process of viscous flow, deformation of viscoelastic materials, frictional sliding, or permanent material deformation or yielding (hysteretic damping).
Deductible (Insurance)	The amount of loss above which an insurance payment is due to the insured.
Deterministic	A method of engineering and decision-making evaluation based solely on the selection of a few natural hazards events used as scenarios. For instance, an historical earthquake may be taken as a scenario to see what would happen if that earthquake recurred. Deterministic methods are typically based on source models and intensity propagation methods that exclude random effects.
Ductility	The ability to sustain deformation beyond the elastic limit (yield) without material failure.
Ductile Detailing	Design details specifically intended to achieve an intended stable yielding mechanism in a building structure or equipment support structure. For example, special requirements for the placement of the reinforcing steel within structural elements of reinforced concrete and masonry construction necessary to achieve non-brittle, ductile behavior (ductility). Ductile detailing may include close spacing of transverse reinforcement to attain confinement of a concrete core or to prevent shear failures, appropriate relative dimensioning of beams and columns and 135 degree hooks on lateral reinforcement.
Duration	The time interval in earthquake ground shaking during which motion exceeds a given threshold. For example, the measure of duration to be used as a measure of damage potential to buildings might be the time interval over which acceleration at the base of a building exceeds, say, 5 percent of the acceleration of gravity.
Earthquake	A sudden ground motion or trembling caused by an abrupt release of accumulated strain acting on the tectonic plates that comprise the Earth's crust. A sudden motion or trembling in the earth caused by the abrupt release of slowly accumulated strain.

Earthquake Fault Zone	See also Alquist-Priolo Special Studies Zone. In California, these are defined areas surrounding active faults, as defined by the State Geologist, within which it is necessary to perform fault location studies in order to construct buildings for human occupancy. Buildings for human occupancy may not be constructed within 50 feet of the identified fault rupture trace. Details of the regulations are presented in Special Publication 42, published by the California Division of Mines and Geology (CDMG).
Earthquake Hazard	The representation of an earthquake hazard can cover ground shaking, response spectra (peak spectral acceleration, peak spectral velocity, peak spectral displacement), peak ground velocity, peak ground acceleration, duration of significant shaking, time-history evaluation, and/or permanent ground deformation including fault offset.
Energy Dissipation Systems	Various structural devices that actively or passively absorb a portion structures of the intensity in order to reduce the magnitude or duration (or both) of a structure response. These devices include active mass systems, passive viscoelastic dampers, tendon devices, and base isolation, and may be incorporated into the building design.
Epicenter/Hypocenter	The point of initial rupture of a fault in an earthquake occurs deep beneath the ground surface at a location referred to as the hypocenter. The point at the ground's surface which is vertically above the hypocenter is called the epicenter. These locations may be estimated by triangulation from a number of different seismographic stations. For uniform ground conditions, ground shaking tends to decrease in intensity with increasing distance from the part fault which ruptured. Since the horizontal extent of fault rupture is short for small-magnitude (e.g. M<5.5) earthquakes, ground shaking tends to decrease with the distance of a site from the epicenter for such events. However, for larger earthquakes (M>6.5), the rupture extends for a significant distance (tens to hundreds of kilometers), making epicentral distance an unreliable estimator of ground shaking intensity.
Exposure	The number, types, qualities, and monetary values of various types of property or infrastructure, life, and environment that may be subject to an undesirable or injurious hazard event. Exposure Period The period of time over which risk is to be computed; the period of time over which a facility or population at risk is subjected to a hazard.
Fault Rupture	The differential movement of two land-masses along a fault. A concentrated, permanent deformation that occurs along the fault trace and caused by slip on the fault.
Fault Scarp	A step-like linear land form coincident with a fault trace and caused by geologically recent slip on the fault.
Fault Trace	An intersection of a fault with the ground surface; also, the line commonly plotted on geologic maps to represent a fault.

Fault Types	*Strike-slip* - a fault along which relative movement tends to occur in a horizontal direction parallel to the surface trace of the fault. The San Andreas is one of the most well known strike-slip faults, although some segments exhibit other kinds of fault behavior. The strike of the fault refers to the angle between the surface trace of the fault and north. *Dip-slip* - A fault for which relative motion occurs parallel to the direction of dip (the deviation of the fault plane from the vertical) of the fault, e.g., motion occurs perpendicular to the surface trace of the fault, at some angle with the vertical. Such faults produce scarps when fault rupture reaches the surface. *Normal* - Dip-slip movement in which the overhanging side of the fault moves downward. *Reverse* - Dip-slip movement in which the overhanging side of the fault moves upward. *Thrust* - A low-angle reverse fault. The 1987 Whittier-Narrows and 1994 Northridge earthquakes occurred on blind thrust faults - thrust faults with no surface expression. *Oblique* - A fault combining strike-slip and dip-slip motion.
Frequency	In the context of risk analysis, this refers to how often an event or outcome will occur, given a specified exposure period. For example, annual frequency is the number of events per year.
Fundamental Period	The longest period of oscillation for which a structure shows a maximum response (the reciprocal of natural frequency).
Geographic Correlation Index (GCI)	An index developed by URS Corporation [W. Graf, 7NCEE, 2002] to indicate the relative severity of risks from a particular building or site on the aggregate losses of a geographically distributed portfolio of buildings or other values at risk from earthquake hazards.
Ground Failure	A general reference to fault rupture, liquefaction, landsliding, and lateral spreading that can occur during an earthquake or other land movement causes.
Ground Shaking	The energy created by an earthquake as it radiates in waves from the earthquake source. A general term referring to the qualitative or quantitative aspects of movement of the ground surface from earthquakes. Ground shaking is produced by seismic waves that are generated by sudden slip on a fault and travel through the earth and along its surface.
Hazard	A natural physical manifestation of the earthquake peril, such as ground shaking, soil liquefaction, surface fault rupture, landslide or other ground failures, tsunami, seiche. These hazards can cause damage to man-made structures. This is an event or physical condition that has the potential to cause fatalities, injuries, property damage, infrastructure damage, agricultural loss, damage to the environment, interruption of business, or other types of harm or loss.
Irregularity (see also Regularity)	

	Describes deviations from optimal seismic structural configuration. Common irregularities are divided into vertical and plan irregularities: Plan irregularities - common cases include reentrant corners, non-symmetric distribution of mass, strength or stiffness within any given story. Vertical irregularities - abrupt changes in plan dimensions, weight, strength or stiffness from one story to another. One common vertical irregularity is the soft or weak story, often the first story, which may lead to structural collapse as earthquake ductility demands concentrate in one story, rather than distributing more uniformly over the height of the building.
Lateral Spread	The landsliding of gentle, water-saturated slopes with rapid fluid-like flow movement caused by ground shaking and liquefaction. Large elements of distributed, lateral displacement of earth materials.
Limit of Liability	(Insurance) The maximum payment amount which an insured may receive for a covered loss.
Liquefaction	When the pressure of the pore water, water located in spaces between soil particles, exceeds particle friction forces, particularly in loose sands with high water content. The soil becomes a soil-water slurry with significantly reduced shear strength. The result can be foundation bearing failure, differential settlement, lateral spreading, or floating of underground components. A process by which water-saturated soil temporarily loses shear strength due to build-up of pore pressure and acts as a fluid.
Local Seismic Hazards	The phenomena and/or expectation of an earthquake-related agent of damage, such as vibratory ground motion (i.e., ground shaking), inundation (e.g., tsunami, seiche, dam failure), various kinds of permanent ground failure (e.g., fault rupture, liquefaction), fire or hazardous materials release.
Loss	The human or financial consequences of damage, such as human death or injury, cost of repairs, or disruption of social, economic, or environmental systems.
Magnitude (M)	Magnitude (M) is the most widely used measure of the size of an earthquake (see also Richter Scale). Magnitude scales are logarithmic, found by taking the common logarithm (base 10) of the largest ground motion recorded at the arrival of the type of seismic wave being measured (a typical seismogram will display separate arrival times for a P-wave - compressional - , an S-wave - shear -, and a train of Rayleigh waves) and correcting for the distance to the earthquake's epicenter. Thus, an increase in magnitude by one unit would correspond to a tenfold increase in measured wave amplitude. Moreover, the energy released by an earthquake increases by a factor of about 30 for each unit increase in magnitude.
Mean	Arithmetic mean or average value in a statistical distribution.
Median	The value in a distribution for which 50% of the distribution values are greater or less than the median value.

Mitigation — Sustained action taken to reduce or eliminate long-term costs and risks to people and property from hazards and their effects. Mitigation distinguishes actions that have a long-term impact from those that are more closely associated with preparedness for, immediate response to, and short-term recovery from a specific event.

Model — A representation of a physical system or process intended to enhance our ability to understand, predict, or control its behavior

Modified Mercalli Intensity (MMI) (abridged) — A numerical scale ranging from I to XII which describes local ground earthquake intensity in terms of local earthquake effects. In many historical earthquakes (1900 to 1970's), few ground shaking instruments were deployed, and ground shaking maps were compiled on the basis of observed effects, using scales like the Modified Mercalli Intensity (MMI) scale. As a result, most building damage statistics are correlated to the MMI scale, since instrumental strong motion data was rare (see Peak Horizontal Acceleration).

I-V	Not significant to structures or equipment.
VI	Felt by all; many are frightened and run outdoors. Some heavy furniture moved; a few instances of fallen plaster or damaged chimneys. Damage slight.
VII	Everybody runs outdoors. Damage negligible in buildings of good design and construction; slight to moderate in well-built ordinary structures; considerable in poorly built or badly designed structures; some chimneys broken. Noticed by persons driving motorcars.
VIII	Damage slight in specially designed structures; considerable in ordinary substantial buildings, with partial collapse; great in poorly built structures. Panel walls thrown out of frame structures. Chimneys, factory stacks, columns, monuments, and walls fall. Heavy furniture overturned. Disturbs persons driving motorcars.
IX	Damage considerable in specially designed structures; well-designed frame structures thrown out of plumb; damage great in substantial buildings, with partial collapse. Buildings shifted off foundations. Ground cracked conspicuously. Underground pipes broken.
X	Some well-built wooden structures destroyed; most masonry and frame structures destroyed, along with foundations; ground badly cracked. Rails bent. Landslides considerable from river banks and steep slopes. Shifted sand and mud. Water splashed (slopped) over banks.
XI	Few, if any, (masonry) structures remain standing. Bridges destroyed. Broad fissures in ground. Underground pipelines completely out of service. Earth slumps and land dips in soft ground. Rails bent greatly.
XII	Damage total. Waves seen on ground surfaces. Lines of sight and level distorted. Objects thrown upward into the air.

Peak Ground Acceleration (PGA). — The maximum amplitude of recorded acceleration. If not specifically stated, this usually refers to horizontal accelerations.

Peak Horizontal Acceleration (PHA) — An instrumental measure of earthquake ground motion intensity, normally taken from a triaxial earthquake accelerogram as the maximum value recorded from

	either of the 2 horizontally-oriented axes. See also Peak Ground Acceleration and Acceleration.
Portfolio	Within the context of typical building seismic risk studies, this refers to a geographically-distributed set of facilities or values-at-risk.
Probability and Frequency	Frequency measures how often an event (including a natural hazard event, a state or condition of a component, or a state or condition of the system) occurs. One way to express expected frequency is the average time between occurrences or exceedances (non-exceedances) of an event. The mean annual rate of occurrence of a hazard parameter within a range of values is another way to express expected frequency of a hazard. Probabilities express the change of the event occurring or being exceeded (not exceeded) in a given unit of time. Whereas probabilities of occurrence cannot exceed 1.0, expected frequencies (for a given time unit) can exceed 1.0. For instance, expected frequencies of an auto accidents in Washington D. C. for a given year are far in excess of 1.0 even though the probability of an auto accident within a given year can only approach very closely 1.0.
Probabilistic Methods	Scientific, engineering, and financial methods of calculating severities and intensities of hazard occurrences and responses of facilities that take into account the frequency of occurrence as well as the randomness and uncertainty associated with the natural phenomena and associated structural and social response.
Probable Loss	A level of building damage from earthquake, expressed as a fraction of the building replacement value, having a stated probability of exceedance within a given exposure period. Alternatively, a level of earthquake damage having a stated return period. Probable Loss is found by considering all levels of earthquake hazard that may occur for the site in question, the building damage associated with each hazard level, and the variability of building damage within each hazard state.
Probable Maximum Loss	A term used in the past to characterize the risk of earthquake damage to buildings.
Probability of Exceedance	In the context of these risk reports, this is the probability that a specified level of damage will be surpassed within the exposure period (related to building life or investment term), given the site's earthquake environment and the facility's seismic vulnerability. The probability of exceedance and exposure period are related to the average return interval of the loss. For example, a loss level that has a 10% chance of exceedance in a 30-year exposure period may be described as having a 285-year average recurrence interval. A loss level that has a 10% chance of exceedance in a 50-year exposure period has a 475-year average recurrence interval.
Recurrence Interval	See Return Period.
Redundancy	The ability of more than one component to fail prior to system failure. In the 1997 Uniform Building Code, a Reliability/Redundancy Factor is defined as the ratio of the design story shear in the most heavily loaded element, divided by the total story shear. In this definition, a low ratio (say 0.1 or less) would imply greater

redundancy, since a single element failure would be unlikely to produce a lateral force system failure at that story.

Regularity

For optimum seismic performance, a building structure should be regular, with:
- balanced earthquake resisting elements (in strength and stiffness)
- symmetrical plan (to reduce torsion or twisting)
- uniform cross section in plan and elevation
- maximum torsional resistance
- short member spans
- direct load paths
- uniform story heights
- redundancy (no single component failure should cause system failure)

Residual Risk

The remaining risk after risk management techniques have been applied.

Response Spectrum

A plot of maximum amplitudes (acceleration, velocity or displacement) of a damped, single degree of freedom oscillator (SDOF) as the natural period of the SDOF is varied across a spectrum of engineering interest (typically, for natural periods form 0.03 to 3 or more seconds, or frequencies of 0.3 to 30+ hertz). Response spectra are tabulated or plotted for specified levels of equivalent viscous damping, typically 5%.

Return Period

The average time span between like events (such as large hazard intensities exceeding a particular intensity) at a particular site or for a specific region (also termed return period). Return period provides a clear and convenient way to express probability. For non-varying random processes, a Poissonian model provides the relationship:

$P = 1 - exp(-t/T)$

P = Probability of exceedance in exposure period, t [years]

T = Average return period [years]

For a 50-year exposure period (t), the normal useful life of a building:

Probability of Exceedance	Return Period
50%	72 years
10%	475 years
5%	950 years
2%	2,475 years

Richter Scale

A system developed by American seismologist Charles Richter in 1935 to measure the strength (or magnitude) of an earthquake, indicating the energy released in an event. Owing to limitations in the instrument used (a Wood-Anderson Seismograph) and the waves it measures, this scale has been supplement by other, more comprehensive measure of earthquake size (often moment magnitude).

Risk

The chance of adverse consequences. The combination of the expected likelihood (frequency) and the defined consequences)severity) of incidents that could result from a particular activity. The chance or probability that some defined undesirable outcome, such as injury, damage or loss, will occur during a specified exposure period.

Risk Assessment	An evaluation of the risk associated with a specific hazard. Quantitative elements of this assessment are defined in terms of probabilities and/or frequencies of occurrence and severity of consequences.
Risk Reduction Measures	Those activities that reduce overall the costs and risks associated with specific hazards.
Scenario	A type of event as defined by its natural hazard source parameters. That is, a scenario is defined by the source (the initiating event, e.g., the initial location and its severity expressed in such terms as magnitude or wind velocity), which may have many variable consequences dependent on random factors. A simulation is the assessment of these random factors to define specifically the consequences of the specific source event.
Scenario Loss	The loss from one scenario event (given specific values of the random values for other factors not defining the specific scenario). Alt., per ASTM Standard Guide E 2026-16a, a level of building damage from earthquake, expressed as a fraction of the building replacement value, associated with a stated earthquake hazard scenario. In these reports, probabilistic seismic hazards are used, and the stated scenario is based on the level of ground shaking that has a 10% chance of being exceeded in the exposure period specified by the user. Scenario Loss is further specified as the mean loss (Scenario Expected Loss or SEL) or the 90% nonexceedance loss (Scenario Upper Loss or SUL) for the stated hazard.
Seiche	A standing wave oscillation of an enclosed water body that continues, pendulum fashion, after the cessation of the originating force, which may have been either seismic or atmospheric.
Seismicity	The geographic distribution of past historic or future expected earthquakes, based upon historical or instrumental records, geologic evidence, or other means. The annual rate of occurrence of earthquakes, greater than or equal to a given magnitude, within a defined geographic area.
Seismic Zonation	Geographic delineation of areas having different potentials for hazardous effects from future earthquakes. Seismic zonation can be done at any scale—national, regional, or local. For example, California has two Seismic Zones as identified in the 1997 Uniform Building Code (UBC): Zone 3 and Zone 4. Zone 3 is the less seismically active area and is located in the northern-central valley of the State extending from the northern border to Bakersfield, plus a portion of the desert area east of the San Bernardino Mountains. This is a large portion of the State and includes Sacramento. Zone 4 is the most seismically active area and is located along the western coast of the state extending from Eureka to San Diego.
Slip	The relative displacement of formerly adjacent points on opposite sides of a fault, measured on the fault surface.
Slip Model	A kinematic model that describes the amount, distribution, and timing of slip associated with a real or postulated earthquake.

Slip Rate	The average rate of displacement at a point along a fault as determined from geodetic measurements, from offset man-made structures, or from offset geologic features whose age can be estimated.
Soil Profile	The vertical arrangement of soil horizons down to the parent material or to bedrock. Under current building codes (e.g., the Uniform Building Code, the International Building Code) and FEMA NEHRP guidelines, the soil profile may be categorized by average shear wave velocity in the upper 30m of sediments.
Source	The geologic structure that generates a particular earthquake or class of earthquakes.
Subduction Zone	An area in the earthquake lithosphere (crust) in which two tectonic plate are converging, and one plate is being thrust (subducted) under the other. Where a continental plate and an oceanic plate converge, generally the thinner oceanic plate is subducted. A subduction zone may exhibit seismicity in the form of large interplate events, in which slip occurs along the shallow dipping surface between the plates, or intraplate events (i.e., occurring within either plate, rather than along the boundary (Benioff zone) between the plates. Shallow seismicity may occur in the upper plate. Volcanic activity is usually associated with subduction zones, from the melting of the subducting plate creating buoyant magmas.
Vulnerability	The susceptibility of a building, equipment item or component to damage or loss from a specific hazard. Syn.: Fragility
Tsunami	Seismic seawave. Tsunamis may be generated from earthquakes beneath the ocean, by submarine volcanic eruptions, and by slope failures in underwater canyons. Regions of the Pacific with subduction zones (such as the Pacific Northwest, the Aleutian Islands or the area east of Japan) present tsunami hazards to the Pacific coastline. Tsunami waves may travel great distances and cause damage many hours after the causative earthquake or slide. As fast traveling deep-ocean waves approach shallow areas along the shore, they slow down and increase in height. Near-shore bathymetry and onshore topography control run-up. Structures may be damaged by inundation, impact from fast-moving water and the debris it transports.

Appendix D – Qualifications

Reza Imani, Ph.D., P.E., S.E.

Manager, Structural Engineering & Risk Mitigation, ImageCat, Inc.

Reza Imani received his Ph.D. degree in Civil (Structural) Engineering from the University at Buffalo (SUNY) in 2014 and is a registered Professional Engineer (Civil) in the State of California.

Mr. Imani has 9 years of combined research and practice experience in analysis, risk evaluation and design of structures subjected to multi-hazard loading conditions (e.g. earthquake, fire, wind) and extreme events (e.g. post-earthquake fires). Reza's research and practice experience also involve application of the Performance-Based Design method to structures under seismic and fire loads. Clients include lenders, building owners, property insurers, government agencies, issuance brokers, municipal bond rating agencies and bond insurers. Prior to joining ImageCat, Reza was a Project Engineer with Thornton Tomasetti, Inc (San Francisco Office). During his 5 years in TT, Reza was involved in various seismic design, risk assessment/evaluation and retrofit projects both within and out of the U.S. from commercial, sports, education and healthcare sectors. Reza was also a member of TT's Forensics team, using advanced analytics and engineering principles to investigate causes of failure or other concerns in behavior of structures.

Relevant Publications include:

Imani R., Ghisbain P., Ashrafi A., (2016). "Performance-based Fire Engineering: Sensitivity Analysis on Design Parameters", Published in Proceedings of the 9th International Conference on Structures in Fire (SiF 2016), Princeton University, June 2016.

Imani, R., Bruneau., (2015) "Effect of Link-beam Stiffener and Brace Flange Alignment on Inelastic Cyclic Behavior of Eccentrically Braced Frames", AISC Engineering Journal, Vol. 52, No. 2, pp 109-124.

Imani, R., Mosqueda G., Bruneau, M., (2015) "Finite Element Simulation of Concrete-Filled Double-Skin Tube Columns Subjected to Post-Earthquake Fires", ASCE Journal of Structural Engineering, Vol.141, No.12, DOI: 10.1061/(ASCE)ST.1943-541X.0001301.

Imani, R., Mosqueda G., Bruneau, M. (2014), "Experimental Study on Post-Earthquake Fire Resistance of Ductile Concrete Filled Double-Skin Tube Columns", ASCE Journal of Structural Engineering, Vol.141, No.8 DOI: 10.1061/(ASCE)ST.1943-541X.0001168.

R. Rofooei, F., Imani, R., (2011). "Evaluating the Damage in Steel MRF under Near Field Earthquakes from a Performance Based Design Viewpoint", Procedia Engineering, 14: 3325-3230, The Proceedings of the Twelfth East Asia-Pacific Conference on Structural Engineering and Construction, Kowloon, Hong Kong.

Imani, R., Bruneau, M., (2014). "Post-Earthquake Fire Resistance of Ductile Concrete Filled Double-Skin Tube Columns" Technical Report MCEER-14-0008, MCEER, Univ at Buffalo, Buffalo, NY.

W. P. Graf, M.S., P.E.

Vice President of Engineering, ImageCat, Inc.

William P. Graf, P.E. received an M.S. degree in Structural Engineering from UCLA (1981) and is a registered Professional Engineer (Civil) in the State of California.

Mr. Graf has 40 years of experience in seismic and other natural hazard and risk analyses for individual buildings, building portfolios, and lifeline structures. Bill also performs analyses of structures subject to earthquake or other loads, and develops seismic strengthening schemes. Bill is a member of the Earthquake Engineering Research Institute, and a member of the subcommittee for PML standards, ASTM E 2026 and E 2557. Clients include lenders, building owners, property insurers, government agencies, issuance brokers, municipal bond rating agencies and bond insurers. Prior to joining ImageCat, Bill was with the Los Angeles of URS Corporation for 24 years, where he managed of earthquake risk services. Bill started his engineering career with Bechtel Power Corporation, designing buildings and utility structures for 7 years.

Bill has conducted field surveys for damage to buildings and equipment from the following earthquakes: 1987 Whittier-Narrows, 1989 Loma Prieta, 1991 Sierra Madre, 1992 Desert Hot Springs, 1992 Landers/Big Bear, 1994 Northridge and 1995 Tauramena (Colombia) earthquakes.

Publications include:

Characterizing the Epistemic Uncertainty in the USGS 2014 National Seismic Hazard Mapping Project (NSHMP) (second author, with Y. Lee and Z. Hu), Bulletin of the Seismological Society of America, 2018.

"Collateral Damage from the Collapse of Tall Buildings from Earthquakes in an Urban Environment," with Jerry Lee and Michael Eguchi, Third International Conference on Urban Disaster Reduction, 2014.

"Epistemic Uncertainty, Rival Models, and Closure," with C.E. Taylor, R. Murnane and Y. Lee (3rd author), Natural Hazards Review, February, 2013.

"Earthquake Damage to Wood-Framed Buildings in the ShakeOut Scenario," with Hope A. Seligson, Earthquake Spectra Journal, May 2011

"Code-Oriented Damage Assessment," EERI Spectra Journal, February, 2009 (with Jerry Lee).

"A Geographic Correlation Index For Portfolio Seismic Risk Analysis," 7th U.S. National Conference on Earthquake Engineering, Boston, July, 2002.

"Developments In Single-site Earthquake Risk Assessment," 6th International Conference on Seismic Zonation, Palm Springs, California, November, 2000.

"Analysis and Testing of a Flat Slab Concrete Building", Tenth World Conference on Earthquake Engineering, Madrid, Spain, July 1992 (co-authored with M. Mehrain).

"Dynamic Analysis of Tilt-up Buildings", Fourth U.S. National Conference on Earthquake Engineering, Palm Springs, California, May 1990 (co-authored with M. Mehrain).

"Lenders, Insurers, and Earthquake Loss Estimation", Fourth Annual National Earthquake Hazards Reduction Program Workshop, Puget Sound, Washington, April, 1990 (co-authored with C. Taylor and C. Tillman).

Appendix E – Seismic Design Code Objectives

Seismic Design Code Objectives for New Buildings

The provisions for seismic design of new buildings in building codes typically assume that a building will have a 50-year useful life. When these buildings were designed, the governing code in the Western United States was the Uniform Building Code, and the design motions were typically intended to capture the maximum intensity of shaking that might be expected for the site during its useful life. Redondo Beach was always in the highest seismic zone recognized by the Uniform Building Code. As ground shaking hazard models improved, the hazard level was further specified to have a 10% chance of exceedance within the 50-year assumed design life. This is equivalent to a ground shaking hazard level with a 475-year average recurrence (or a "return period" of 475 years). The objective of the seismic design code was not and is not to prevent all damage or render the building "earthquake-proof," but rather to prevent gross collapse and thereby to achieve an acceptable level of life-safety.

For "essential facilities" such as hospitals, building codes since the 1970s have required design for higher ground motions in an effort to reduce damage and ensure rapid (or immediate) resumption of essential services. After the 1971 Sylmar Earthquake, hospitals in California were designed under the supervision of the Office of the State Architect. In the early 1980s, the California Office of Statewide Health Planning and Development (OSHPD, now HCAI) took over oversight of acute-care hospital design in California. After the 1994 Northridge Earthquake caused damage to hospitals in southern California, Senate Bill 1953 was passed and administered by OSHPD, requiring the seismic retrofit of structural and nonstructural systems of older acute-care hospital buildings found to be seismically deficient. A summary of these regulations may be viewed at:

https://hcai.ca.gov/construction-finance/seismic-compliance-and-safety/program-overview/

Since January, 2008, the State of California has used the International Building Code (IBC) as the basis for seismic design of new buildings. The IBC defines the Maximum Considered Earthquake (MCE) ground motions as the hazard level associated with a 2% chance of exceedance in 50 years, or having a 2,475-year return period. Design-level motions are taken as 2/3 of the MCE level. The ground motions are further modified to result in designs for ordinary buildings that will resist the MCE with less than a 10% probability of collapse. *This design approach is viewed as having collapse probabilities of 1% or less in the 50-year typical building life.* Essential buildings are designed for higher loads, with the result that they should exhibit higher safety and damage resistance.

Seismic Evaluation and Retrofit Standards for Existing Buildings

The current national standard for seismic evaluation and retrofit of existing buildings is ASCE 41-17. It permits the selection of several levels of performance (e.g., life-safety, collapse preventions, etc.) for structural and nonstructural systems based on two hazard levels:

BSE-1E: Basic Safety Earthquake-1 for use with the Basic Performance Objective for Existing Buildings, taken as a seismic hazard with a 20% probability of exceedance in 50 years.

BSE-2E: Basic Safety Earthquake-2 for use with the Basic Performance Objective for Existing

Buildings, taken as a seismic hazard with a 5% probability of exceedance in 50 years.

ASCE 41 is cited by various jurisdictions in California for use in design to meet mandatory seismic retrofit ordinances, and is often used by Structural Engineers in voluntary seismic retrofits. A number of local building jurisdictions in California (e.g., City of Los Angeles, City of Santa Monica, etc.) have enacted mandatory seismic retrofit ordinances for older concrete buildings such as the towers at 514 North Prospect Avenue. The City of Redondo Beach has not indicated that it intends to pass such an ordinance.

Appendix F – Commercial Real Estate Lender and Owner Criteria for Seismic Risk

Seismic risk assessments for property transfer due-diligence generally follows two standards established by ASTM:

E2026-16a: Standard Guide for Seismic Risk Assessment of Buildings

E2557-16a: Standard Practice for Probable Maximum Loss (PML) Evaluations for Earthquake Due-Diligence Assessments

Seismic risk assessments are conducted by experienced Professional Engineers, working with other professionals (e.g., Geotechnical Engineers) as needed. Seismic risk assessments are typically conducted in seismically active areas (e.g., California, and western Washington and Oregon).

According to the Standards mentioned above, any seismic risk assessment as part of the due-diligence process includes:

1) A seismic hazard assessment to estimate ground motion intensities and an evaluation of site stability, considering surface fault rupture, soil liquefaction and earthquake-induced landslide.

2) A building stability assessment to assess safety and identify serious seismic deficiencies that might result in collapse under intense ground shaking in large earthquakes.

3) A building damage assessment to estimate the repair cost (as a fraction of building replacement value) under a scenario earthquake usually defined as the 475-year recurrent ground shaking and associated hazards.

Lenders and institutional purchasers typically require that both the building and the site be deemed "stable," and that the damage levels be less than some acceptable level that they designate. The acceptable level differs for various lenders and investors, as some may have be willing to take more risks. For example, some lenders require a Scenario Expected Loss (SEL) values of less than 20%. Other with lower levels of acceptable risk may require a Scenario Upper Loss (SUL) value that is less than 20%. If a building is deemed unstable or the projected damage is surpassing the mentioned limits, mitigation measures are recommended, including seismic retrofit and/or earthquake insurance. When these mitigation measure are not financially feasible, some lenders or investors may decide not to pursue the deal.

Attachment 2

The Healthy Living Campus

Evaluation of Development Strategy: Seismic Retrofitting Alternative

June 12, 2020

CAIN BROTHERS
A division of
KeyBanc Capital Markets

BCHD
A Public Agency
Beach Cities Health District

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Situational Background

- The District plans to redevelop its 11-acre campus in Redondo Beach as the Healthy Living Campus. Plans for the Healthy Living Campus include a variety of senior living, post-acute care, and ancillary health programs and services to promote wellness and active living

- The District has been working with a team of consultants for several years to evaluate ideas and concepts and create preliminary redevelopment plans

- One of the early concepts was the retrofitting of the existing 514 N Prospect Building ("514 Building"), which was evaluated by the District and determined to be financially infeasible, a conclusion which the District asks Cain Brothers to review

- One of the challenges facing the District is the need to replace approximately $3.75 million annual net cash flow from the existing 514 Building (which will be retrofitted in the seismic option) and the Lazar Ducot Note Receivable/Note Payable which will be paid off in 2024

- The District has approximately $15 million in cash and reserves which can be used to support or fund the redevelopment of the Healthy Living Campus

Key Assumptions

- The District has evaluated the costs and considerations of retrofitting the 514 Building
- The redevelopment strategy would involve:
  - Estimated $93 million construction costs ($2023)
  - 18 month construction period
  - 143,000 sf net rentable space
  - Vacating the building of current tenants
    - >$3.3 million annual revenue
    - >Monthly rental rate: $2.65/sf (Includes BOE Reimbursement)
    - >104,775 sf currently rented
- The District's evaluation concluded that retrofitting the 514 Building would not be a feasible alternative
- The District also asked CBRE/Manhattan Realty to independently evaluate the opportunity to retrofit the 514 Building
  - CBRE/Manhattan Realty utilized a discounted cash flow approach to evaluate the economics of the retrofitting strategy and came to same conclusion, that retrofitting the 514 Building was not financially feasible strategy (see page 3)

CBRE Analysis - 514 Q&D Rehabilitation Feasibility

- Based on a discounted cash flow methodology, the current value of 514 Building is $85.7 million
- Total cost of retrofitting 514 Building is approximately $119 million, including construction costs, tenant build-out credits and contingency
- If the District does not increase monthly rental rates, the retrofitting strategy produces loss of $33.4 million value
- To produce a $119 million break even value for 514 Building, the District would need to increase monthly rental rates to $5.76/sf
- However, $119 million value does not necessarily provide sufficient annual cash flow to support District activities

CBRE/Manhattan Realty Analysis (1)

	Scenario I (Market Rent)			Scenario II (Break Even)		
Rent	143,371	$4.50	$7,742,029	143,371	$5.76	$9,909,797
Vacancy	15%		$1,161,304	15%		$1,486,469
EGI			$6,580,724			$8,423,327
Expenses	143,371	$13.00	$1,863,822	143,371	$13.00	$1,863,822
NOI			$4,716,903			$6,559,505
Cap Rate			5.50%			5.50%
Stabilized Value			$85,761,866			$119,263,735
Less Rehab			$93,000,000			$93,000,000
Less Tenant Buildout	143,371	$150.00	$21,505,635	143,371	$150.00	$21,505,635
Contingency/Other	$93,000,000	5%	$4,650,000	$93,000,000	5%	$4,650,000
Pre-Absorption Value			($33,393,769)			$108,100

Notes:

- The above does not include any costs associated with lease-up, i.e., downtime, commissions, legal, etc.
- Lease-up could be starting from zero as previous tenants might not come back after relocating to allow the retrofit.
- The depth of the market demand is a concern.
- There doesn't seem to be any discount compared to new construction.
- New construction could be sized to match expected demand.
- Construction of a new MOB could potentially be timed to capture/accommodate the tenant relocations from 514 and possibly 510 as well (which is starting to appear more imminent).

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(1) Source: CBRE/Manhattan Realty Analysis dated 03/13/2020

Cain Brothers' Analysis

- Cain Brothers also independently evaluated the financial consequences of retrofitting the 514 Building by analyzing the annual cash flow and monthly rental rates/sf
- Key assumptions include:
  - $93 million retrofitting costs are funded with long-term, fixed rate tax-exempt bonds
  - Resulting in annual debt service of approximately $5.8 million
  - Community Health & Fitness program would be relocated offsite during retrofitting construction
  - District cash reserves would be used to:
    - >Fund initial costs to set up offsite Community Health & Fitness space
    - >Ongoing incremental "off-site" costs of operating Community Health & Fitness space
    - >Replace $2.5 million ongoing net annual rental income from 514 Building
    - >Replace $437K ongoing net cash flow related to Lazar Ducot Note Receivable/Note Payable
- Conclusion:
  - The District would need to charge a minimum of $6.11 – $7.47/sf (depending on how much space in the retrofitted building will be occupied by District activities) for monthly rental rates to fund debt service and support other District programs currently subsidized by the rental activity of 514 Building
  - The District would use $9.0 - $10.4 million of its cash reserves to fund this strategy

Analysis of BCHD Projected Cash Flow and Targeted 514 Revenue

	Budget 6/30/2020	Adjustments		Stabilized Operations
Revenues				
Health & Fitness	2,994,398	No change	-	2,994,398
Property Tax	3,930,505	No change	-	3,930,505
Property Lease	4,812,639	Eliminate Building 514	(3,307,428)	1,505,211
		Termination of Lazar Ducot N/R	(1,157,659)	(1,157,659)
Interest	965,861	No change	-	965,861
Limited Partnership	2,162,000	No change	-	2,162,000
Donations & Other	52,315	No change	-	52,315
Total Revenues	**14,917,718**			**10,452,631**
Expenses				
Health & Fitness	3,199,020	No change		3,199,020
Life	4,228,915	No change		4,228,915
Volunteer,	2,065,434	No change		2,065,434
Property	2,410,343	Debt service on retrofitting costs	5,737,000	8,147,343
Support Services	2,295,593	Ducot Notes Payable	(720,000)	1,575,593
Total Expenses	**14,199,305**			**19,216,305**
Operating Income	**718,413**			**(8,763,674)**

Cash Flow Gap (Projected compared to Budget)		9,482,087
NIADS Target with DSCR =	1.30	7,458,100
Revenue Gap		10,484,774
Building 514 Rentable Space After Retrofit		143,000
Target Annual Rent/sf		$ 73.32
Target Monthly Rent/sf		$ 6.11
Current Monthly Rent/sf (Includes BOE Reimbursement)		$ 2.65

Analysis of BCHD Cash Reserves

The District would use between $9.0 - $10.4 million of its cash reserves to replace the 514 Building net cash flow that currently supports other District programs and to fund relocations costs associated with Community Health & Fitness program

	Average	Conservative	Aggressive
Cash Reserves - 12/31/2019	15,000,000	15,000,000	15,000,000
Less 514 Revenue			
Annual Rent (not including BOE)	2,500,000	2,500,000	2,500,000
Years of Demolition	3	3	3
Total 514 Subsidy	7,500,000	7,500,000	7,500,000
Less CHF Relocation Costs			
Initial Set up	360,000	460,000	260,000
Annual Subsidy for Offsite Rent	600,000	800,000	400,000
Years of Relocation	3	3	3
Total Annual CHF Subsidy	1,800,000	2,400,000	1,200,000
Ending Cash Reserves	5,340,000	4,640,000	6,040,000

Notes:

- Aggressive = Lower initial set up cost of CHF offsite location and lower annual offsite location rent subsidy
- Conservative = Higher initial set up cost of CHF offsite location and higher annual offsite location rent subsidy
- Additional funds from cash reserves may be needed to pay for offsite rent for Administrative offices currently at 1200 Del Amo Blvd

Analysis of Retrofitted 514 Building Rental Rates

The targeted monthly rental rate for 514 Building third party tenants depends on the amount of space used by the District for Community Health & Fitness, Community Services, and/or Administrative Space. The more space occupied by the District, the higher the monthly rental rates for third party tenants.

Gross Building Space (sf)	160,000
Net Rentable Space (sf)	143,000
Community Health and Fitness (sf)	12,000
Community Services (sf)	6,000
Administrative Space (sf)	8,000
Targeted 514 Annual Revenue	$ 10,484,774

Net Rentable Space (sf)	Community Health and Fitness (sf)	Community Services (sf)	Administrative Space (sf)	Third Party Tenants (sf)	Third Party Monthly Rent/sf
143,000	12,000	6,000	8,000	117,000	$ 7.47
143,000	12,000	6,000		125,000	$ 6.99
143,000	12,000			131,000	$ 6.67
143,000				143,000	$ 6.11

Attachment 3

RESOLUTION NO. 2010-10-PCR-035

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF REDONDO BEACH APPROVING AN EXEMPTION DECLARATION AND GRANTING THE REQUESTS FOR AMENDMENTS TO AN EXISTING CONDITIONAL USE PERMIT AND EXISTING PLANNING COMMISSION DESIGN REVIEW TO ALLOW THE EXPANSION OF A RESIDENTIAL CARE FACILITY WITHIN AN EXISTING MEDICAL BUILDING ON PROPERTY LOCATED WITHIN A PUBLIC-COMMUNITY FACILITY (P-CF) ZONE AT 514 NORTH PROSPECT AVENUE (CASE NO. 2010-10-PC-023)

WHEREAS, an application was filed on behalf of the owner of the property located at 514 North Prospect Avenue for approval of an Exemption Declaration and consideration of amendments to an existing Conditional Use Permit and existing Planning Commission Design Review to allow the expansion of a residential care facility within an existing medical building on property located within a Public-Community Facility (P-CF) zone; and

WHEREAS, notice of the time and place of the public hearing where the Exemption Declaration and the applications would be considered was given pursuant to State law and local ordinances by publication in the Beach Reporter, by posting the subject property, and by mailing notices to property owners within 300 feet of the exterior boundaries of the subject property; and

WHEREAS, the Planning Commission of the City of Redondo Beach has considered evidence presented by the applicant, the Planning Department, and other interested parties at the public hearing held on the 21st day of October, 2010, with respect thereto.

NOW, THEREFORE, THE PLANNING COMMISSION OF THE CITY OF REDONDO BEACH DOES HEREBY FIND:

1. In accordance with Section 10-2.2506 of the Redondo Beach, Municipal Code, the request for a Conditional Use Permit is in accord with the criteria set forth therein for the following reasons:

    a) The proposed expansion of the assisted residential care facility for seniors is permitted in the land use district in which the site is located, and the site is adequate in size and shape to accommodate the use and all yards, open spaces, walls, and fences, parking, landscaping and other features, and the project is consistent with the requirements of Chapter 2, Title 10 of the Redondo Beach Municipal Code, to adjust the use with the land and uses in the neighborhood.

b) The site has adequate access to a public street of adequate width to carry the kind and quantity of traffic generated by the proposed expansion of the assisted residential care facility for seniors.

c) The proposed expansion of the assisted residential care facility for seniors has no adverse effect on abutting property or the permitted use thereof, subject to the conditions of approval.

d) The expansion of the assisted residential care facility for seniors is consistent with the Comprehensive General Plan of the City.

2. In accordance with Section 10-2.2502(B) of the Redondo Beach Municipal Code, the applicant's request for Planning Commission Design Review is consistent with the criteria set forth therein for the following reasons:

   a) The project, which consists primarily of the interior remodel of an existing structure considers the impact and needs of the user in respect to circulation, parking, traffic, utilities, public services, noise and odor, privacy, trash collection, security and crime deterrence, energy consumption, physical barriers, and other design concerns.

   b) The project, which consists primarily of the interior remodel of an existing structure, includes the installation of new landscaping and irrigation where a sidewalk was previously located.

   c) The project, which consists primarily of the interior remodel of an existing structure, is harmonious and consistent within the existing architectural style of the structure in so far as it includes the replacement of a set of exterior doors with new windows on the west-facing elevation.

   d) The project, which consists primarily of the interior remodel of an existing structure with the exception of the replacement of a set of exterior doors with new windows on the west-facing elevation, has no impacts on the neighborhood nor the scale and bulk of surrounding properties.

3. The plans, specifications and drawings submitted with the applications have been reviewed by the Planning Commission, and approved.

4. Pursuant to Chapter 3, Title 10 of the Redondo Beach Municipal Code, the project is exempt from the preparation of environmental documents pursuant to Section 15301 of the Guidelines for Implementation of the California Environmental Quality Act (CEQA).

5. The Planning Commission hereby finds that the proposed project will have no impact on Fish and Game resources pursuant to Section 21089(b) of the Public Resources Code.

NOW, THEREFORE, THE PLANNING COMMISSION OF THE CITY OF REDONDO BEACH DOES HEREBY RESOLVE AS FOLLOWS:

Section 1. That based on the above findings, the Planning Commission does hereby approve the Exemption Declaration and grant the amendments to the existing Conditional Use Permit and existing Planning Commission Design Review pursuant to the plans and applications considered by the Planning Commission at its meeting of the 21st day of October, 2010.

Section 2. This permit shall be void in the event that the applicant does not comply with the following conditions:

1. That the approval granted herein is for the conversion of space and use on the first floor of the south tower of the most centrally located structure, known as 514 N. Prospect Avenue, from a medical diagnostic use and a physical therapy use to an assisted residential care facility for seniors, as is reflected on the plans reviewed and approved by the Planning Commission at its meeting on October 21, 2010.

2. That the conversion of the first floor of the structure to an expanded residential care facility for seniors shall substantially conform to the plans reviewed and approved by the Planning Commission at its meeting of October 21, 2010.

3. That a landscaping plan be developed to re-landscape the area directly in front of the building where the exterior ingress/egress doors are to be removed and replaced with windows.

4. That the Planning Department shall be authorized to approve minor changes to the conversion of the first floor of the structure of the new residential care facility for seniors.

5. That the conversion of the first floor of the structure to an expanded residential care facility for seniors shall comply with all applicable codes and regulations implemented by the Building Division, the Fire Department and any other agencies with jurisdiction over the project.

6. That all state and local regulations relating to the construction of the proposed project shall be adhered to.

7. That, in the event of a disagreement in the interpretation and/or application of these conditions, the issue shall be referred back to the Planning Commission for a decision prior to the issuance of a building permit.

8. That the conditions of Planning Commission Resolutions 2006-05-PCR-020 and 2007-09-PCR-033 shall remain in full force and effect except as amended herein.

9. That the Planning Commission shall retain jurisdiction of the matter for the purpose of enforcing compliance with these conditions and for the purpose of modification thereof as circumstances may subsequently indicate.

Section 3. That the approved amendments to the existing Conditional Use Permit and existing Planning Commission Design Review shall become null and void if not vested within 36 months after the Planning Commission's approval of the project.

Section 4. That, prior to seeking judicial review of this resolution, the applicant is required to appeal to the City Council. The applicant has ten days from the date of adoption of this resolution in which to file the appeal.

FINALLY RESOLVED, that the Planning Commission forward a copy of this resolution to the City Council so the Council will be informed of the action of the Planning Commission.

PASSED, APPROVED AND ADOPTED this 21st day of October, 2010.

Douglas Kim, Chair
Planning Commission
City of Redondo Beach

ATTEST:

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) SS
CITY OF REDONDO BEACH)

I, Aaron Jones, Planning Director of the City of Redondo Beach, California, do hereby certify that the foregoing Resolution No. 2010-10-PCR-035 was duly passed, approved and adopted by the Planning Commission of the City of Redondo Beach, California, at a regular meeting of said Planning Commission held on the 21st day of October, 2010, by the following roll call vote:

AYES: Chair Kim, Commissioners Benning, Garten, Zager, Sanchez, and Parsons

NOES: None

ABSENT: Commissioner Biro

Aaron Jones, Planning Director

APPROVED AS TO FORM:

City Attorney's Office

Administrative Report

Planning Commission Hearing Date: **October 21, 2010**

AGENDA ITEM: 12 (PUBLIC HEARINGS)

PROJECT LOCATION: 514 NORTH PROSPECT AVENUE

APPLICATION TYPE: EXEMPTION DECLARATION, AMENDMENTS TO A CONDITIONAL USE PERMIT AND PLANNING COMMISION DESIGN REVIEW

CASE NUMBER: 2010-10-PC-023

APPLICANT'S NAME: SILVERADO SENIOR LIVING

APPLICANT'S REQUEST AS ADVERTISED:

Consideration of an Exemption Declaration and amendments to an existing Conditional Use Permit and Planning Commission Design Review to allow an expansion of a residential care facility within an existing medical building on property located within a Public-Community Facility (P-CF) Zone.

DEPARTMENT'S RECOMMENDATION:

The Planning Department recommends that the Planning Commission make the findings as set forth in the staff report, adopt the Exemption Declaration and approve amendments to the Conditional Use Permit and Planning Commission Design Review, subject to the plans and applications submitted, and the conditions below.

DEPARTMENT'S ANALYSIS OF REQUEST:

BACKGROUND/EXISTING CONDITIONS:

The subject property is developed with a 37,000 square foot facility, built in 1976, that consists of three separate buildings (510, 514 & 520 Prospect) surrounded by various parking structures and parking lots. Access to the site is provided via three (3) driveways off of North Prospect Avenue. The centrally located driveway is the public entrance, while the driveway to the south is a designated staff entrance.

The facility is occupied by a variety of health care providers including an Imaging Facility, Ob/Gyn-Infertility Office, Massage-acupuncture-hypnotherapy Services, Pulmonary/Internal Medicine, Family Practice, Internal Medicine, Dermatology, Cardiology, Ophthalmology and Physical Therapy Services, a Surgery Center, a Gym

offering yoga and pilates, a Lab, a Dialysis Center, Cancer Care, the BCHD offices, Urgent Care and a pharmacy.

The subject property is surrounded by a variety of uses including single-family residences to the west, south and east, and a shopping center and service station to the north.

On May 18, 2006, the Planning Commission approved a Conditional Use Permit (see attached Staff Report and Resolution No. 2006-05-PCR-020) to allow the reconfiguration of the 2nd, 3rd and 4th floors of the medical facility with acute care beds to residential care beds for the elderly. The new facility was designed specifically for seniors with Alzheimer's and is operated by a company known as Silverado Senior Living. The total project area is 27,300 square feet in size with 9,100 square feet of space on each floor consisting of the small residential units and common areas: a living area; dining areas; an activity area; spa; and other miscellaneous areas. There is also a 3,780 square foot outdoor garden located on a terrace beside the south tower cafeteria.

On September 20, 2007,the Planning Commission also approved a Planning Commission Design Review for the facility (see attached Staff Report and Resolution No. 2007-09-PCR-033) to allow for various exterior façade modifications including the addition of new balconies/decks adjacent to each of the three floors, two (2) new glass canopies and other changes in the window and door openings and formations.

The Silverado facility has been operational with 88 beds since March 2009.

CURRENT REQUEST:

The applicant is seeking approval to amend the existing Conditional Use Permit and Planning Commission Design Review to allow the expansion of the Silverado Senior Living facility, located on the 2nd, 3rd and 4th floors of the south tower of 514 N. Prospect, to the first floor. The first floor area under consideration is currently occupied by an imaging center and a cardio-pulmonary rehabilitation center.

The first floor expansion consists of the interior remodel of 10,735 square feet of gross floor area. 4,720 square feet of the area will be used to construct 16, two (2) bedroom units. The remaining area will be remodeled to create residents' activity areas, a dining area, restrooms, administrative offices and other support uses. Once the first floor remodel is complete it will connect to the rest of the facility by way of stairs or an elevator located in the lobby at the north end of each of the four floors.

Currently there are west-facing doors on the first floor that provide exterior ingress and egress to the first floor area. These doors, which are set in approximately eight (8) feet from the exterior wall, are to be removed and replaced with windows that will be flush with the exterior wall. The new windows will match the existing windows along the west-facing elevation. In addition, the small section of sidewalk that currently leads to the

doors will be removed and replaced with new landscaping to match the existing landscaping.

EVALUATION OF REQUEST:

The proposed project requires the approval of an amendment to the existing Conditional Use Permit and the Planning Commission Design Review.

CONDITIONAL USE PERMIT

The purpose of a Conditional Use Permit is to ensure that the site is appropriate for the proposed use, that the site has adequate access to a public street that can accommodate the traffic generated by the use, that the proposed use will not have an adverse effect on the surrounding neighborhood and that the project is consistent with the City's General Plan.

The original project, as approved in 2006, is located entirely within the 514 N. Prospect structure, with the exception of a small outdoor garden area located on a south-facing terrace and the enclosed balconies located off of the 2nd, 3rd and 4th floors. The proposed expansion will also be located within the footprint of the 514 N. Prospect structure with the exception of an 8 foot by 8 foot area, 64 square feet in total that will be gained by removing ingress/egress doors and replacing them with windows flush with the exterior windows.

The following information was taken into consideration in approving the ratio of one parking space for every three (3) beds when the project was first approved in 2006.

a. All the residents of Silverado Senior Living have Alzheimer's or Dementia and are no longer self-mobile or can no longer drive an automobile.

b. Many of the employees utilize ridesharing, bicycling, or public transit for their commute due to the close proximity to their homes.

c. Families and visitors of the Silverado residents usually visit after commuting hours in the evening. Families typically come to see their loved ones on the weekends and after work.

d. Silverado provides a community shuttle that transports their residents, their families and employees for visits, special events, shopping and other excursions, greatly reducing the number of trips made from the site.

The operators of the facility have found the above considerations to be true. The current facility has been operating since March, 2009 with no impacts on on-site parking. Therefore, the conversion of 10,735 square feet of gross floor area from physical rehabilitation uses, which requires one parking space for every 300 square feet or a total of 36 parking spaces, to an assisted residential care use with 32 beds,

which requires one parking space for every three (3) beds or 11 parking spaces, will result in a reduction in the demand for on-site parking.

In 2006, staff completed Initial Environmental Study No. 2006-03-IES-MND-005. Among other things the study examined the trip generation potential for the proposed use. The trip generation study, based on information provided by the Institute of Transportation Engineers (ITE) Trip Generation Report, 7th Edition, indicated that the assisted residential care use would generate considerably less traffic, only about 20% as much, as the previous use. Information contained in the Institute of Transportation Engineers (ITE) Trip Generation Report, 8th Edition confirms that the proposed use will generate less traffic than the existing use. Representatives of Silverado and BCHD indicate that there have not been any negative impacts on traffic circulation as a result of the new facility. Therefore, the conversion of 10,735 square feet of gross floor area from a medical diagnostic use and a physical rehabilitation use to an assisted residential care use with 32 beds will result in a decrease in the average vehicle trips to and from the subject property thereby reducing the current demands on the on-site and off-site traffic circulation systems.

According to representatives of BCHD, the operation of the existing facility has not had an adverse effect on any of the other uses on the subject property. It is logical to conclude, therefore, that a small expansion of the existing facility will not cause negative impacts on the other uses on the campus.

The expansion of the existing assisted residential care facility is consistent with the City's General Plan which states that it is the goal of the City to provide the types and mix of land uses necessary to serve the needs of existing and future residents. This site is designated "P" Public in the General Plan. Policy 1.46.1 of the General Plan permits "human health" and "human services" on properties designated "P" Public. Given the aging demographics of our population it is not surprising that this facility is looking to expand and it is likely that more of these facilities will be needed in the near future.

PLANNING COMMISION DESIGN REVIEW

The purpose of Planning Commission Design Review is to ensure compatibility, originality, variety, and innovation in the architecture, design, landscaping, and site planning of developments in the community. Thoughtful consideration of urban design helps preserve or sometimes improves property values, prevents the blight and deterioration of neighborhoods, promotes sound land use, encourages design excellence, and protects the overall health, safety, and welfare of the City.

In this instance, the proposed expansion to the existing assisted residential care facility is primarily an interior remodel and has minimal impact on the architecture of the existing structure. The removal of a set of exterior doors on the west-facing elevation will result in a small, 64 square foot, expansion of the interior space. As per the plans, the doors are to be replaced by windows that will be flush with the exterior wall and will

match the existing windows on that elevation. The existing sidewalk that leads to the doors will be removed and replaced with landscaping and irrigation. The applicant will be required to provide landscape plans during the plan check phase to show that appropriate plantings will be installed in that area.

ENVIRONMENTAL STATUS:

The project is Categorically Exempt pursuant to section 15301 of the California Environmental Quality Act (CEQA).

FINDINGS:

1. In accordance with Section 10-2.2506 of the Redondo Beach, Municipal Code, the request for a Condition Use Permit is in accord with the criteria set forth therein for the following reasons:

   a) The proposed expansion of the assisted residential care facility for seniors is permitted in the land use district in which the site is located, and the site is adequate in size and shape to accommodate the use and all yards, open spaces, walls, and fences, parking, landscaping and other features, and the project is consistent with the requirements of Chapter 2, Title 10 of the Redondo Beach Municipal Code, to adjust the use with the land and uses in the neighborhood.

   b) The site has adequate access to a public street of adequate width to carry the kind and quantity of traffic generated by the proposed expansion of the assisted residential care facility for seniors.

   c) The proposed expansion of the assisted residential care facility for seniors has no adverse effect on abutting property or the permitted use thereof, subject to the conditions of approval.

   d) The expansion of the assisted residential care facility for seniors is consistent with the Comprehensive General Plan of the City.

2. In accordance with Section 10-2.2502(B) of the Redondo Beach Municipal Code, the applicant's request for Planning Commission Design Review is consistent with the criteria set forth therein for the following reasons:

   a) The project, which consists primarily of the interior remodel of an existing structure considers the impact and needs of the user in respect to circulation, parking, traffic, utilities, public services, noise and odor, privacy, trash collection, security and crime deterrence, energy consumption, physical barriers, and other design concerns.

b) The project, which consists primarily of the interior remodel of an existing structure, includes the installation new landscaping and irrigation where a sidewalk was previously located.

c) The project, which consists primarily of the interior remodel of an existing structure, is harmonious and consistent within the existing architectural style of the structure in so far as it includes the replacement of a set of exterior doors with new windows on the west-facing elevation.

d) The project, which consists primarily of the interior remodel of an existing structure with the exception of the replacement of a set of exterior doors with new windows on the west-facing elevation, has no impacts on the neighborhood nor the scale and bulk of surrounding properties.

3. The plans, specifications and drawings submitted with the applications have been reviewed by the Planning Commission, and approved.

4. Pursuant to Chapter 3, Title 10 of the Redondo Beach Municipal Code, the project is exempt from the preparation of environmental documents pursuant to Section 15301 of the Guidelines for Implementation of the California Environmental Quality Act (CEQA).

5. The Planning Commission hereby finds that the proposed project will have no impact on Fish and Game resources pursuant to Section 21089(b) of the Public Resources Code.

CONDITIONS:

1. That the approval granted herein is for the conversion of space and use on the first floor of the south tower of the most centrally located structure, known as 514 N. Prospect Avenue, from a medical diagnostic use and a physical therapy use to an assisted residential care facility for seniors, as is reflected on the plans reviewed and approved by the Planning Commission at its meeting on October 21, 2010.

2. That the conversion of the first floor of structure to an expanded residential care facility for seniors shall substantially conform to the plans reviewed and approved by the Planning Commission at its meeting of October 21, 2010.

3. That a landscaping plan be developed to re-landscape the area directly in front of the building where the exterior ingress/egress doors are to be removed and replaced with windows.

4. That the Planning Department shall be authorized to approve minor changes to the conversion of the first floor of structure the new residential care facility for seniors.

5. That the conversion of the first floor of the structure to an expanded residential care facility for seniors shall comply with all applicable codes and regulations implemented by the Building Division, the Fire Department and any other agencies with jurisdiction over the project.

6. That all state and local regulations relating to the construction of the proposed project shall be adhered to.

7. That, in the event of a disagreement in the interpretation and/or application of these conditions, the issue shall be referred back to the Planning Commission for a decision prior to the issuance of a building permit.

8. That the conditions of Planning Commission Resolutions 2006-05-PCR-020 and 2007-09-PCR-033 shall remain in full force and effect except as amended herein.

9. That the Planning Commission shall retain jurisdiction of the matter for the purpose of enforcing compliance with these conditions and for the purpose of modification thereof as circumstances may subsequently indicate.

Prepared by:

Anita Kroeger
Associate Planner

Approved by:

Aaron Jones
Planning Director

attachments

- Planning Commission Staff Report, May 18, 2006
- Resolution No. 2006-05-PCR-020
- Planning Commission Staff Report, September 20, 2007
- Resolution No. 2007-09-PCR-033

CITY OF REDONDO BEACH

EXEMPTION DECLARATION
PURSUANT TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

DATE: October 21, 2010

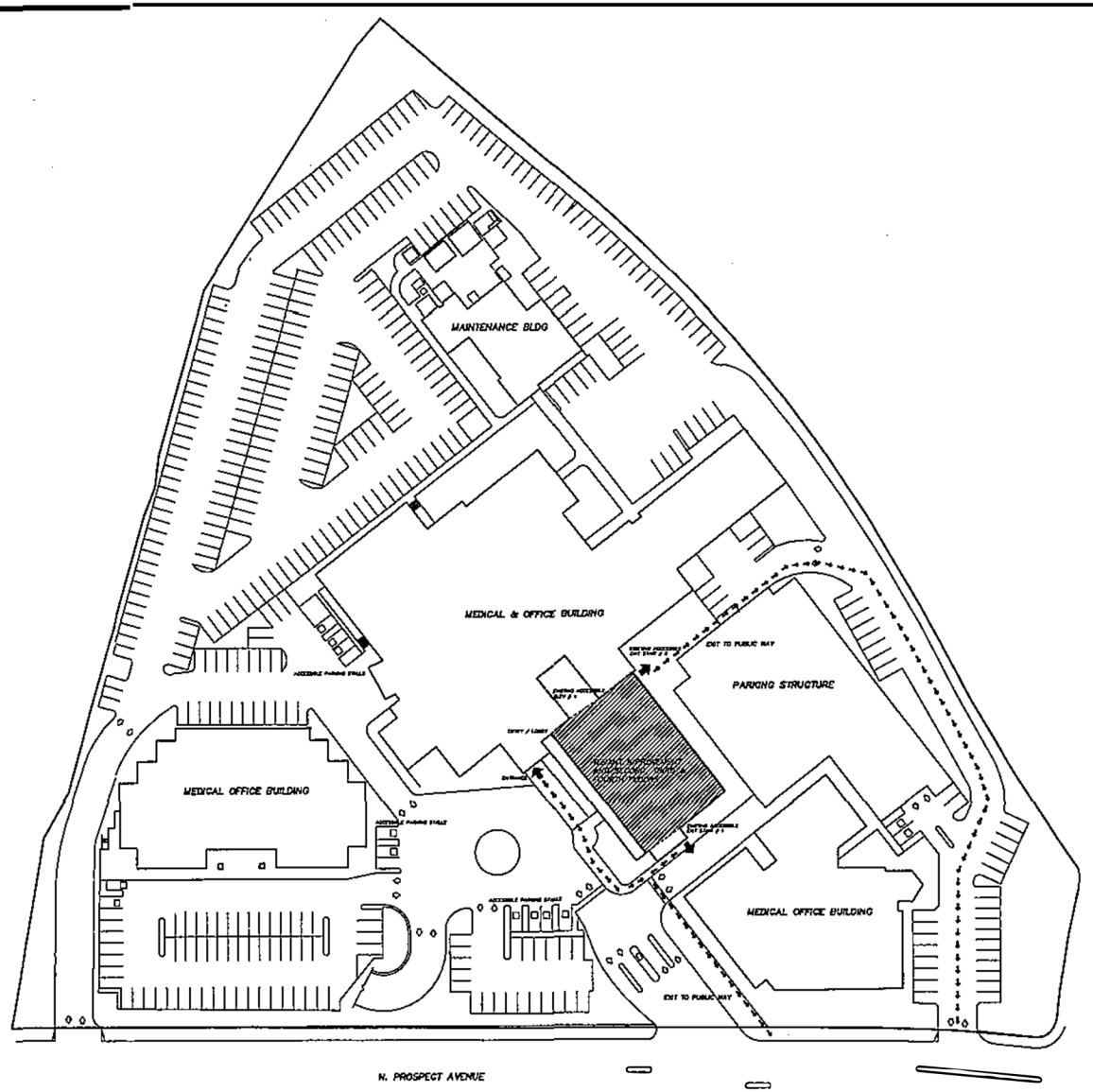
PROJECT ADDRESS: 514 North Prospect Avenue

PROPOSED PROJECT: Consideration of an Exemption Declaration for the approval of amendments to an existing Conditional Use Permit and Planning Commission Design Review to allow an expansion of a residential care facility within an existing medical building on property located within a Public-Community Facility (P-CF) Zone.

In accordance with Chapter 3, Title 10, Section 10-3.301(a) of the Redondo Beach Municipal Code, the above-referenced project is Categorically Exempt from the preparation of environmental review documents pursuant to:

> Section 15301 of the Guidelines for Implementation of the California Environmental Quality Act (CEQA) states, in part, that projects involving minor alteration of existing facilities with negligible or no expansion are categorically exempt from the preparation of environmental documents. This finding is supported by the fact that the proposed project consists of the expansion of a residential care facility within an existing medical building on property located within a Public-Community Facility (P-CF) Zone.

Anita Kroeger
Associate Planner



SITE PLAN NOTES

REFER TO ADDITIONAL NOTATIONS ON SHEETS A-1.0 & A-1.1

SITE PLAN (FIRST FLOOR) 1/32" = 1'-0" 1

KEY PLAN

IRWIN PANCAKE
ARCHITECTS
ARCHITECTURE
PLANNING
CONSULTING
343 FISCHER AVENUE
SUITE B-D
COSTA MESA
CALIFORNIA 92626
TEL 714-556-3724
FAX 714-556-1572
www.irwin-pancake.com

SILVERADO SENIOR LIVING
SOUTH BAY
415 N PROSPECT AVE
REDONDO BEACH CA

SITE PLAN

A-0.1

Attachment 4

RESOLUTION NO. 2006-05-PCR-020

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF REDONDO BEACH APPROVING A NEGATIVE DECLARATION AND GRANTING THE REQUESTS FOR A CONDITIONAL USE PERMIT AND PLANNING COMMISSION DESIGN REVIEW TO PERMIT THE CONVERSION OF THREE FLOORS OF AN EXISTING MEDICAL FACILITY TO A RESIDENTIAL CARE FACILITY (ASSISTED LIVING) WITH 84 BEDS ON PROPERTY LOCATED WITHIN A PUBLIC-COMMUNITY FACILITY (P-CF) ZONE AT 514 NORTH PROSPECT AVENUE (CASE NO. 2006-04-PC-017)

WHEREAS, an application was filed on behalf of the owner of the property located at 514 North Prospect Avenue for approval of a Negative Declaration, consideration of a Conditional Use Permit and request for Planning Commission Design Review to permit the conversion of three floors of an existing medical facility to a residential care facility (assisted living) with 84 beds on property located within a Public-Community Facility (P-CF) zone; and

WHEREAS, notice of the time and place of the public hearing where the Negative Declaration and the applications would be considered was given pursuant to State law and local ordinances by publication in the Easy Reader, by posting the subject property, and by mailing notices to property owners within 300 feet of the exterior boundaries of the subject property; and

WHEREAS, the Planning Commission of the City of Redondo Beach has considered evidence presented by the applicant, the Planning Department, and other interested parties at the public hearing held on the 18th day of May, 2006, with respect thereto.

NOW, THEREFORE, THE PLANNING COMMISSION OF THE CITY OF REDONDO BEACH DOES HEREBY FIND:

1. In accordance with Section 10-2.2506 of the Redondo Beach, Municipal Code, the request for a Condition Use Permit is in accord with the criteria set forth therein for the following reasons:

    a) The proposed use is permitted in the land use district in which the site is located, and the site is adequate in size and shape to accommodate the use and all yards, open spaces, walls, and fences, parking, landscaping and other features, and the project is consistent with the requirements of Chapter 2, Title 10 of the Redondo Beach Municipal Code, to adjust the use with the land and uses in the neighborhood.

b) The site has adequate access to a public street of adequate width to carry the kind and quantity of traffic generated by the proposed use.

c) The proposed use has no adverse effect on abutting property or the permitted use thereof, subject to the conditions of approval.

d) The project is consistent with the Comprehensive General Plan of the City.

2. The plans, specifications and drawings submitted with the applications have been reviewed by the Planning Commission, and approved.

3. The Planning Commission hereby finds that Negative Declaration No. 2006-02-IES-ND-005 has been prepared and circulated in compliance with the provisions of the California Environmental Quality Act (CEQA), and the procedures set forth in the ordinances of the City of Redondo Beach.

4. The Planning Commission hereby finds and determines that the proposed project will not have a significant effect on the environment, subject to the modifications of the design review and conditions of approval.

5. The Planning Commission hereby finds that the proposed project will have a "de minimis" impact on fish and game resources pursuant to Section 21089(b) of the Public Resources Code.

6. The Planning Commission further finds that in reviewing the Negative Declaration it has exercised its own independent judgment.

NOW, THEREFORE, THE PLANNING COMMISSION OF THE CITY OF REDONDO BEACH DOES HEREBY RESOLVE AS FOLLOWS:

Section 1. That based on the above findings, the Planning Commission does hereby approve the Negative Declaration and grant the Conditional Use Permit and Planning Commission Design Review pursuant to the plans and applications considered by the Planning Commission at its meeting of the 18th day of May, 2006.

Section 2. This permit shall be void in the event that the applicant does not comply with the following conditions:

1. That the approval granted herein is for the conversion of space and use on the second, third and fourth floors of the south tower of the most centrally located building (514 N. Prospect Avenue) from acute care facilities to an assisted living residential care facility for seniors, as is reflected on the plans reviewed and approved by the Planning Commission at its meeting on May 18, 2006.

2. That the conversion of the second, third and fourth floors of the hospital building to a new residential care facility for seniors shall substantially conform to the plans reviewed and approved by the Planning Commission at its meeting of May 18, 2006.

3. That long-term parking spaces be designated for residents to store their vehicles as required.

4. That a landscaping plan be developed to re-landscape the area directly in front of the building and adjacent to and within the enclosed patio/outdoor garden, to be created for the residential care facility patients in conformance with water-conservation requirements.

5. That the Planning Department shall be authorized to approve minor changes to the conversion of the second, third and fourth floors of hospital building to new residential care for seniors.

6. That the conversion of the second, third and fourth floors of hospital building to the new residential care for seniors shall comply with all applicable codes and regulations implemented by the Building Division, the Fire Department and any other agencies with jurisdiction over the project.

7. That all state and local regulations relating to the construction of the proposed project shall be adhered to.

8. That, in the event of a disagreement in the interpretation and/or application of these conditions, the issue shall be referred back to the Planning Commission for a decision prior to the issuance of a building permit.

9. That the Planning Commission shall retain jurisdiction of the matter for the purpose of enforcing compliance with these conditions and for the purpose of modification thereof as circumstances may subsequently indicate.

Section 3. That the requests for a Conditional Use Permit and Planning Commission Design Review shall become null and void if not vested within 36 months after the Planning Commission's approval of the project.

Section 4. That, prior to seeking judicial review of this resolution, the applicant is required to appeal to the City Council. The applicant has ten days from the date of adoption of this resolution in which to file the appeal.

FINALLY RESOLVED, that the Planning Commission forward a copy of this resolution to the City Council so the Council will be informed of the action of the Planning Commission.

PASSED, APPROVED AND ADOPTED this 18th day of May, 2006.

Lenore Bloss, Vice-Chair
Planning Commission
City of Redondo Beach

ATTEST:

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) SS
CITY OF REDONDO BEACH)

I, Randy Berler, Planning Director of the City of Redondo Beach, California, do hereby certify that the foregoing Resolution No. 2006-05-PCR-020 was duly passed, approved and adopted by the Planning Commission of the City of Redondo Beach, California, at a regular meeting of said Planning Commission held on the 18th day of May, 2006, by the following roll call vote:

AYES: Vice-Chair Bloss, Commissioners Garten, Kim, Kilroy, and Houterman

NOES: None

ABSENT: Commissioner Zager

Randy Berler, Planning Director

APPROVED AS TO FORM:

Assistant City Attorney

Administrative Report

Planning Commission Hearing Date: **May 18, 2006**

AGENDA ITEM: 10 (PUBLIC HEARINGS)

PROJECT LOCATION: 514 NORTH PROSPECT AVENUE

APPLICATION TYPE: CONDITIONAL USE PERMIT, PLANNING COMMISSION DESIGN REVIEW AND NEGATIVE DECLARATION

CASE NUMBER: 2006-04-PC-017

APPLICANT'S NAME: SILVERADO SENIOR LIVING

APPLICANT'S REQUEST AS ADVERTISED:

Consideration of a Negative Declaration, Planning Commission Design Review and Conditional Use Permit to allow the conversion of three floors of an existing medical facility to a residential care facility (assisted living) with 84 beds, on property located within the Public-Community Facility (P-CF) zone.

DEPARTMENT'S RECOMMENDATION:

The Planning Department recommends that the Planning Commission make the findings as set forth in the staff report, adopt the Negative Declaration and approve the Planning Commission Design Review and Conditional Use Permit, subject to the plans and applications submitted, and the conditions below.

DEPARTMENT'S ANALYSIS OF REQUEST:

BACKGROUND/EXISTING CONDITIONS:

The subject property is developed with a 37,000 square foot facility, built in 1976, that consists of three separate buildings surrounded by various parking structures and parking lots. Access to the site is provided via two driveways off of North Prospect Avenue. The centrally located driveway is the public entrance, while the driveway to the south is a designated staff entrance.

The facility is occupied by a variety of health care providers including the Little Company of Mary Women's Wellness Center and Rehab Center, Beach Cities Ambulatory Care, Beach Cities Health District Center for Health & Fitness, an Urgent Care Center, a Dialysis Center and an Imaging Facility.

The subject property is surrounded by a variety of uses including single-family residences to the west, south and east, and a shopping center and service station to the north.

CURRENT REQUEST:

The applicant is seeking approval to remodel and establish new uses on the second, third and fourth floors of the south tower of the most centrally located structure (514 N. Prospect Avenue). More specifically, the proposed project is to convert areas previously used for acute care nursing units to an assisted living residential care facility for seniors. The project includes the reconfiguration of the 2nd, 3rd and 4th floors from 77 acute care beds to 84 residential care beds for the elderly.

The total project area is 27,300 square feet with 9,100 square on each of the 2nd, 3rd, and 4th floors of the south tower, which are to be converted into small residential units and common areas including a living area, dining areas, activity area, spa and other miscellaneous areas. The units will consist of six (6) one-bed units, 275 square feet in size, and thirty-nine (39) two-bed units, 300 square feet in size.

A 3,780 square outdoor garden is to be created next to the south tower cafeteria. The secured garden area will only be accessible from the inside of the facility. The area will be completely landscaped and will feature a curved pathway and a small seating area.

Exterior modifications will occur on the north side only. The modifications include new balconies to be installed on the north side of each of the three floors with a trellis over the fourth floor balcony, the removal of some of the windows, the installation of double doors that will lead onto the balconies and the construction of a new quarter glass canopy. All exterior colors and materials are designed to match the existing colors and materials.

A sign advertising the facility is to be installed over the fourth floor windows directly east of the new balconies.

It should be noted that a similar request for a 57-bed assisted living facility was approved by the Planning Commission on April 21, 2005. However, the plans with that operator did not work out.

EVALUATION OF REQUEST:

The proposed project requires the approval of a Conditional Use Permit. The purpose of a Conditional Use Permit is to ensure that the site for the proposed use is appropriate for that specific use, that the site has adequate access to a public street that can accommodate the traffic generated by the use, that the proposed use will not have an adverse effect on the surrounding neighborhood and that the project is consistent with the City's General Plan.

The subject property and the improvements located on the site are adequate to accommodate the proposed assisted living residential care facility. The facility will be located entirely within an existing structure, with the exception of a small outdoor garden area, and will require interior modifications to the floor plans and some minor, cosmetic exterior modifications. The proposed project will not affect any existing conditions on the site such as building setbacks, parking, circulation, landscaping or other features.

The site has access to a public street that is adequate in width to carry the traffic generated by the proposed use and other existing uses on the subject property. As is stated in the environmental document, Initial Environmental Study No. 2006-02-IES-ND-005, the proposed use is expected to generate considerably less traffic (230 daily trips) than the former hospital use (909 daily trips). These calculations are based on trip generation figures contained in the Institute of Traffic Engineers, Trip Generation Manual (7th Edition, 2003), which indicates that residential care facilities generate 2.74 round trips per bed versus 11.81 roundtrips per hospital bed. There is more than sufficient on-site parking. A very limited number of long-term parking spaces may need to be designated for the few residents who own cars. Most of the residents will not own cars.

The project will not have an adverse effect on the surrounding areas because the proposed use will not generate any additional traffic or parking demands, noise or other undesirable impacts. The proposed facility will provide a much needed residential care facility for the elderly who require living assistance and who wish to remain living in the South Bay area.

The approval of an assisted living residential care facility for the seniors is consistent with the City's General Plan which states that it is the goal of the City to provide the types and mix of land uses necessary to serve the needs of the existing and future residents. This site is designated "P" Public in the General Plan. Policy 1.46.1 of the General Plan permits "human health" and "human services" is areas designated "P". Given the aging demographics of our population it is likely that more of these facilities will be needed in the near future.

ENVIRONMENTAL STATUS:

Pursuant to the California Environmental Quality Act (CEQA), staff prepared an Initial Environmental Study (2006-02-IES-ND-005) to evaluate the potential environmental impacts attributable to the project. The IES found that the proposed project could not have a significant adverse effect on the environment and as such Negative Declaration No. 2006-02-IES-ND-005 has been prepared.

FINDINGS:

1. In accordance with Section 10-2.2506 of the Redondo Beach, Municipal Code, the request for a Condition Use Permit is in accord with the criteria set forth therein for the following reasons:

   a) The proposed use is permitted in the land use district in which the site is located, and the site is adequate in size and shape to accommodate the use and all yards, open spaces, walls, and fences, parking, landscaping and other features, and the project is consistent with the requirements of Chapter 2, Title 10 of the Redondo Beach Municipal Code, to adjust the use with the land and uses in the neighborhood.

   b) The site has adequate access to a public street of adequate width to carry the kind and quantity of traffic generated by the proposed use.

   c) The proposed use has no adverse effect on abutting property or the permitted use thereof, subject to the conditions of approval.

   d) The project is consistent with the Comprehensive General Plan of the City.

2. The plans, specifications and drawings submitted with the applications have been reviewed by the Planning Commission, and approved.

3. The Planning Commission hereby finds that Negative Declaration No. 2006-02-IES-ND-005 has been prepared and circulated in compliance with the provisions of the California Environmental Quality Act (CEQA), and the procedures set forth in the ordinances of the City of Redondo Beach.

4. The Planning Commission hereby finds and determines that the proposed project will not have a significant effect on the environment, subject to the modifications of the design review and conditions of approval.

5. The Planning Commission hereby finds that the proposed project will have a "de minimis" impact on fish and game resources pursuant to Section 21089(b) of the Public Resources Code.

6. n The Planning Commission further finds that in reviewing the Negative Declaration it has exercised its own independent judgment.

CONDITIONS:

1. That the approval granted herein is for the conversion of space and use on the second, third and fourth floors of the south tower of the most centrally located building (514 N. Prospect Avenue) from acute care facilities to an assisted living residential care facility for seniors, as is reflected on the plans reviewed and approved by the Planning Commission at its meeting on May 18, 2006.

2. That the conversion of the second, third and fourth floors of hospital building to the new residential care facility for seniors shall substantially conform to the plans reviewed and approved by the Planning Commission at its meeting of May 18, 2006.

3. That long-term parking spaces be designated for residents to store their vehicles as required.

4. That a landscaping plan be developed to re-landscape the area directly in front of the building and adjacent to and within the enclosed to and within the enclosed patio/out door garden to be created for the residential care facility patients in conformance with water-conservation requirements.

5. That the Planning Department shall be authorized to approve minor changes to the conversion of the second, third and fourth floors of hospital building to the new residential care for seniors.

6. That the conversion of the second, third and fourth floors of hospital building to the new residential care for seniors shall comply with all applicable codes and regulations implemented by the Building Division, the Fire Department and any other agencies with jurisdiction over the project.

7. That all state and local regulations relating to the construction of the proposed project shall be adhered to.

8. That, in the event of a disagreement in the interpretation and/or application of these conditions, the issue shall be referred back to the Planning Commission for a decision prior to the issuance of a building permit.

9. That the Planning Commission shall retain jurisdiction of the matter for the purpose of enforcing compliance with these conditions and for the purpose of modification thereof as circumstances may subsequently indicate.

Prepared by:

Anita Kroeger
Senior Planner

Approved by:

Randy Berler
Planning Director

ATTACHMENT “2”

RUTAN
RUTAN & TUCKER, LLP

Joseph D. Larsen
Direct Dial: (714) 641-3418
E-mail: jlarsen@rutan.com

July 15, 2024

VIA E-MAIL AND
FIRST CLASS MAIL

Planning Commission
City of Redondo Beach
Attn: Sean Scully
415 Diamond Street
Redondo Beach, California 90277

Email:
GeneralPlanEIR@redondo.org
Sean.Scully@redondo.org

Re: Comments on Agenda Item for July 18, 2024 Meeting: Updates to General Plan Elements

Dear Planning Commission:

We are writing to provide comments on the agenda item scheduled for the upcoming meeting on July 18, 2024, titled "Public Hearing to Introduce Updates to the City's General Plan Land Use, Open Space & Conservation, Noise, and Safety Elements Recommendation."

We are writing on behalf of Beach Cities Health District ("BCHD"), a public agency that provides a wide range of preventive health services to South Bay residents, including those in the City of Redondo Beach (the "City"). BCHD is concerned about that portion of the City's proposed update to its General Plan Land Use Element that would affect BCHD's 9.7-acre campus at 514 North Prospect Avenue (the "Campus").

The Campus is currently improved with medical offices, community wellness and memory care facilities, a maintenance building, and a parking structure. The Campus has a public or institutional (P) land use designation in the City's General Plan and is zoned as a community facility ("P-CF") under the City's zoning code. Currently, there is no specified maximum Floor Area Ratio ("FAR") for P-CF zoned parcels. Instead, the carefully crafted language of the existing General Plan allows for flexibility in terms of use by subjecting development to discretionary design review. (Redondo Muni Code § 10-2.1116.)

However, the proposed General Plan update, without any cogent explanation or rationale, sets a maximum FAR on the Campus at 0.75. This is extremely troubling because, upon adoption, it would substantially limit BCHD's ability to modernize its outdated and seismically deficient Campus.

The building on the Campus was originally constructed in 1958 and, because of its age and seismic deficiencies, must be replaced. Indeed, a seismic retrofit of the Campus is economically unfeasible. Moreover, due to their age, the Campus' existing buildings require substantial annual maintenance and, within the near future, BCHD's annual maintenance costs for the Campus are expected to exceed its annual operational revenues. If prolonged, this operational deficit will lead to a reduction in BCHD programs and may ultimately lead to insolvency. As a result, BCHD is in the process of modernizing the Campus in a way that will more efficiently connect City residents with health and wellness services, programs, and facilities. Since 2017, BCHD has engaged in public outreach to plan and design its Campus. The proposed modernization includes a residential care facility for the elderly (which will consist of memory care and assisted living units), space for a program for all-inclusive care for the elderly, community services, and a youth wellness center. More information is available online at https://www.bchdcampus.org/faq.

Upon adoption, the proposed FAR would significantly undermine the viability of BCHD's revitalization of the Campus and thereby seriously compromise its ability to continue its mission of providing necessary public services, including preventative health care to the City and surrounding community. Without modernization in the coming years, BCHD will be unable to function at the Campus – resulting in a loss of necessary public health services to the Beach Cities area.

Notably, the proposed maximum FAR is not consistently applied to all properties with a public or institutional (P) land use designation in the General Plan and zoned P-CF. For example, properties within the City's civic center and the City-owned property at the northeast corner of Pacific Coast Highway and Vincent Street have a proposed maximum FAR of 1.25. However, other properties with a public or institutional (P) land use designation, including the Campus and school sites within the City, have a maximum FAR of 0.75. It's important to note, however, that school sites have a different use and zone designation – school facilities (P-SF) – and may be exempt from local land use regulations under the Government Code. This means that BCHD's Campus is the *only* property of its size with a public or institutional (P) land use designation in the General Plan and zoned P-CF affected by this proposed limitation.

For the reasons set forth herein, BCHD respectfully requests that the City eliminate the proposed maximum FAR of 0.75 for the Campus or make the minimum FAR a uniform 1.25 across all properties with a public or institutional (P) land use designation in the General Plan and zoned P-CF.

A. THE PROPOSED FAR REQUIREMENTS FOR PROPERTIES WITH A PUBLIC OR INSTITUTIONAL (P) LAND USE DESIGNATION VIOLATE GOVERNMENT CODE § 65852.

The proposed FAR requirements violate the uniformity requirements of the Planning & Zoning Law. As required under Section 65852 of the Government Code, with regards to zoning districts: "All such regulations shall be uniform for each class or kind of building or use of land

throughout each zone, but the regulation in one type of zone may differ from those in other types of zones." In *Neighbors in Support of Appropriate Land Use v. Tuolumne County* (2007), the courts held that "the foundations of zoning would be undermined. . .if local governments could grant favored treatment to some owners on a purely ad hoc basis. Cities and counties unquestionably have the power to rezone and their decisions to do so are entitled to great deference; but rezoning, even of the smallest parcels, still necessarily respects the principle of uniformity. This is because a rezoning places a parcel within a general category of parcels (those in the new zone), all of which are subject to the same zoning regulations. The county's action in this case, by contrast, placed the [landowner's] land in a class by itself."

Similarly, there appears to be one parcel of its size with a public or institutional (P) land use designation and P-CF zoning designation subject to this proposed maximum FAR of 0.75 – the Campus. Why? Because the other similarly situated and sized properties in the City with a public or institutional (P) land use designation and P-CF zoning designation are owned and controlled by the City, for which there is a different maximum FAR of 1.25.[1] In essence, the City is seeking to establish a parcel-specific land-use restriction that limits the Campus to a unique 0.75 FAR not shared by its own public or institutional (P) designated properties of a similar size and use.

B. THE PROPOSED MAXIMUM FAR OF 0.75 WOULD VIOLATE BCHD'S RIGHTS TO DUE PROCESS.

The Due Process Clause of the Fourteenth Amendment to the United States Constitution prohibits a state from depriving a person of life, liberty, or property without due process of law. (*See also* Cal. Con., art. I, sec. 7.) The touchstone of substantive due process is the protection of the individual against arbitrary government action; the due process clause was intended to prevent government officials from abusing their power or employing it as an instrument of oppression. (*Wolff v. McDonnell*, 418 U.S. 539, 558 (1974); *Collins v. City of Harker Heights* (1992) 503 U.S. 115, 126.) A violation of substantive due process rights occurs if a government agency's actions are (1) irrational or arbitrary or (2) not rationally related to a legitimate government interest. (*Village of Euclid v. Ambler Realty Co.* (1926) 272 U.S. 365; *Lingle v. Chevron* (2005) 544 U.S. 528.) The test is disjunctive. Thus, a property owner need only demonstrate facts to support one of the two bases to state a viable due process claim.

If the City were to adopt the proposed 0.75 FAR for the Campus, its actions would be arbitrary and irrational and would constitute an abuse of power, subjecting it to liability under the Due Process Clause. In *Arnel Development Co. v. City of Costa Mesa* (1981) 126 Cal.App.3d 330,

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[1] The school properties that have a public or institutional land use designation are not similarly situated. They are zoned P-SF and, for school related purposes, generally provide for large open park areas. Regardless, unlike the Campus, school properties may be exempted from local land use regulations (Gov. Code 53094(b)) and the proposed 0.75 FAR maximum.

337, the court ruled that the enactment of an initiative measure downzoning property was arbitrary and discriminatory where enacted without considering appropriate planning criteria and for the sole and specific purpose of defeating a single development. (*See also Fry v City of Hayward* (N.D. Cal. 1988) 701 F.Supp. 179 [zoning restrictions applicable to just one of several open space areas in City invalidated for denial of equal protection], *Del Monte Dunes, Ltd. v. City of Monterey* (9th Cir. 1990) 920 F.2d 1496, 1508 [allegations that city council approved a 190 unit project with conditions that had been substantially met, then same council members abruptly changed course and rejected the project motivated not by legitimate regulatory concerns, but by political pressure from neighbors to preserve property as open space, could constitute arbitrary and irrational conduct] and *Herrington v. County of Sonoma* (9th Cir. 1987) 834 F.2d 1488 [denial of subdivision and subsequent downzoning of property violated property owner's due process rights given evidence that county's general plan/subdivision inconsistency determination was irrational and arbitrary and aimed at defeating particular development project].)

Here, if the City were to adopt the proposed 0.75 for the Campus, it would be engaging in the same conduct that the court invalidated in the *Arnel* and *Fry* cases. Specifically, approval of the proposed 0.75 FAR would constitute irrational and arbitrary conduct not based on appropriate planning criteria and for the sole and specific purpose of defeating the proposed modernization of the Campus.

A planning regulation cannot be aimed at or discriminate against a particular property owner or applicant. (*See, e.g.*, *G&D Holland Construction Co. v. City of Marysville* (1970) 12 Cal. App.3d 989, 994 [when the police power has been exercised in such a manner as to oppress or discriminate against an individual or individuals or a particular parcel of land, it will be overturned]; *see also Lockary v. Kayfetz* (9th Cir. 1990) 917 F.2d 1150, 1155-1156 [if agency's moratorium on the issuance of new water hookups based on a water shortage was pre-textual, as alleged, owners could state viable substantive due process and equal protection claims].) The proposed 0.75 FAR here is plainly and unmistakably aimed at blocking redevelopment of the Campus. Because the proposed 0.75 FAR is an arbitrary and discriminatory action aimed at one particular user, it is not reasonably related to a legitimate state interest. (*See, e.g.*, *Lockary*, *supra*, 917 F.2d at 1155 [court observes that the reasonable relationship test "will not sustain conduct by state officials that is malicious, irrational or plainly arbitrary."].)

In sum, enactment of the proposed 0.75 FAR, which subjects the Campus to different or more burdensome requirements than imposed on similarly situated properties, would deprive BCHD of its constitutionally protected right to due process.

C. ADOPTION OF THE PROPOSED 0.75 FOR THE CAMPUS WOULD VIOLATE BCHD'S RIGHT TO EQUAL PROTECTION.

The Fourteenth Amendment to the United States Constitution provides that no state shall deny to any person within its jurisdiction the equal protection of the laws. (*See also* Cal. Con.,

art. I, sec. 7.) The concept of equal protection has been defined to mean that no person or class of persons may be denied the same protection of law that is enjoyed by other persons or other classes in like circumstances. (*Hawn v. County of Ventura* (1977) 73 Cal.App.3d 1009, 1018.) A claimant must show that the state "has adopted a classification that affects two or more *similarly situated* groups in an unequal manner." (*Walgreen Co. v. City & County of San Francisco* (2010) 185 Cal.App.4th 424, 434 [emphasis in the original].) An equal protection challenge to a regulation that does not involve a suspect class or fundamental right must nevertheless bear a reasonable relationship to a legitimate state interest. (*Young v. American Mini Theaters* (1976) 427 U.S. 50.) "[A] deliberate, irrational discrimination, even if it is against one person (or other entity) rather than a group, is actionable under the equal protection clause." (*World Outreach Conference Center v. City of Chicago* (7th Cir. 2009) 591 F.3d 531, 538.)

The term spot zoning is used to describe a zoning action that violates the principle of equal protection because of its discriminatory nature. (*See, e.g., Ross v. City of Yorba Linda* (1991) 1 Cal. App.4th 954 [denial of rezoning to allow property owner to develop their property at densities similar to those on surrounding parcels, was arbitrary and discriminatory and thus unlawful]; and *Kissinger v. City of Los Angeles*, 161 Cal.App.2d 454, 460 (1958) [downzoning of island surrounded by multi-family residential and commercial uses to single-family use found to be improper].)

Here, the Campus is designated for public use by the General Plan and zoned P-CF. The only other parcels of comparable size in the City that are likewise improved or designated for such uses are City-owned properties. However, the proposed General Plan update carves out an exemption to the proposed 0.75 FAR for those City-owned properties. As in *Ross*, "the City's arbitrary line-drawing is antithetical to the individual right to equal protection of the law." (1 Cal.App.4th at 962.) Enactment of the proposed 0.75 for the Campus would thus constitute arbitrary and discriminatory spot zoning in violation of BCHD's right to equal protection.

Considering the foregoing, enactment of the proposed 0.75 for the Campus, which subjects the Campus to different or more burdensome requirements than imposed on similarly situated properties, would deprive BCHD of its constitutionally protected right to equal protection under the law.

D. THE PROPOSED MAXIMUM FAR OF 0.75 ON THE CAMPUS WILL RESULT IN THE LOSS OF PUBLIC SERVICES, INCLUDING THE LOSS OF PREVENTATIVE HEALTH CARE AND ASSISTED LIVING, RESULTING FROM.

BCHD serves as a vital hub for public services, offering preventative health care, educational programs, community events, and outreach initiatives. These activities contribute significantly to the well-being of the community. Restricting BCHD's ability to replace outdated and seismically deficient buildings on the Campus would inevitably result in a loss of space and resources needed to deliver these essential services, significantly diminishing the overall quality

of life in the area. There is no justification or rationale for imposing the proposed FAR on BCHD's Campus, particularly when other properties with the same land use designation and zoning are permitted a higher FAR of 1.25.

E. THE PROPOSED FAR OF 0.75 IS INCONSISTENT WITH THE POLICIES OUTLINED IN THE DRAFT GENERAL PLAN.

The proposed maximum FAR of 0.75 in the draft General Plan update for the Campus is too restrictive and inconsistent with the policies and goals of the General Plan, especially regarding public and institutional uses, health and land use, and health partnerships.

The Campus aims to provide a hub of well-being that serves and connects Beach Cities residents of all ages with abundant health and wellness services, programs, and facilities. The proposed FAR of 0.75 would severely constrain the redevelopment potential and the design flexibility of the Campus and prevent it from achieving its vision and mission. Moreover, this FAR is inconsistent with the following policies identified in the draft General Plan:

- Policy LU-1.13: Public and Institutional Uses. This policy states that the City should "Provide for the continuation of existing and expansion of governmental administrative and capital facilities, schools, libraries, hospitals and associated medical offices, public cultural facilities, and other public uses, ancillary parks, recreation and open spaces and other public land uses and facilities to support the existing and future population and development of the City" (pg. 2-18). The Campus is a public and institutional use that provides health and wellness services and facilities to the community, and it must be allowed to expand and accommodate the growing and changing needs of the Beach Cities residents. The proposed FAR of 0.75 would undermine this policy by substantially limiting the amount of floor area that can be used for these purposes.

- Policy LU-4.2: Health and Land Use. This policy states that the City should "Seek to incorporate health considerations into land use planning" (pg. 2-20). The Campus is a project that exemplifies this policy by creating a hub that promotes health and well-being for all generations. The proposed FAR of 0.75 would undermine this policy by restricting the floor area that can be allocated for health-related programs and facilities, such as the youth wellness center, a program for all-inclusive care for the elderly (PACE), a community wellness pavilion, and an aquatics center.

- Policy LU-4.7: Health Partnerships. This policy states that the City should "Build and maintain partnerships with the [sic], health care providers, health promoting non-profits and community-based organizations to evaluate and implement land use projects in a manner that improves community health" (pg. 2-21). The Campus is a project that reflects this policy by partnering with BCHD, a public agency that

provides a wide range of preventive health services to South Bay residents, including those in the City. The proposed FAR of 0.75 would run contrary to this policy by limiting the Campus' ability to efficiently connect City residents with health and wellness services, programs, and facilities. By proposing this restrictive FAR, the City is essentially dismantling and disregarding any partnership it has with BCHD to accomplish the goal of promoting health in the City.

Therefore, we urge the Planning Commission to reconsider the proposed FAR of 0.75 for the Campus and to adopt a uniform FAR of 1.25 across all properties with a public or institutional (P) land use designation in the General Plan and zoned P-CF. That would be more in line with the policies and goals of the General Plan, and that allows the Campus to fulfill its vision and mission of providing a hub of well-being for the Beach Cities residents.

F. BY LIMITING THE ABILITY TO PROVIDE ONGOING RESIDENTIAL CARE FOR THE CITY'S ELDERLY COMMUNITY, THE PROPOSED FAR OF 0.75 IS INCONSISTENT WITH THE CITY'S HOUSING ELEMENT.

The Campus is important in providing assisted living options for seniors in the City. The City's 6th Cycle 2021-2029 Housing Element acknowledges that elderly residents and individuals with disabilities have unique housing needs. (Housing Element, pg. 28.) In the City, disabled individuals make up 6.5% of the population, with 45% of them being aged 65 and older. (*Ibid.*) Independent living difficulties are common among these elderly residents. (Housing Element, Table H-18.) However, housing options for persons with disabilities, including community care facilities, are limited in the City. Indeed, the City only has six residential care facilities for the elderly, with a total capacity of 282 beds. (2021-2029 Housing Element, pg. 30.) One of these facilities is located on the Campus.

The need for suitable housing options for persons with disabilities, including community care facilities, is crucial. In fact, the staff report for the Campus' 2006 Conditional Use Permit to convert part of its full-service community center into an assisted living facility explicitly emphasizes the urgent need for a residential care facility to cater to elderly individuals who require living assistance while desiring to remain in the South Bay area. Further, the staff report for the Campus' 2010 Conditional Use Permit to expand the assisted living facility explicitly noted, "[g]iven the aging demographics of [the City's] population, it is not surprising that this facility is looking to expand and it is likely that more of these facilities will be needed in the near future." However, the proposed FAR of 0.75 for the Campus limits its ability to provide ongoing residential care for the City's elderly community, which goes against the City's commitment to addressing their specialized housing needs. Moreover, any refusal to make reasonable accommodations in rules, policies, or practices when such accommodation is necessary to afford disabled seniors equal opportunity to residential care would violate the federal Fair Housing Act (42 U.S.C. §§ 3601-3631) and/or California's Unruh Civil Rights Act.

G. THE PROPOSED MAXIMUM FAR OF 0.75 LIKELY VIOLATES SENATE BILLS 330 AND 8 (HOUSING CRISIS ACT OF 2019).

Governor Gavin Newsom enacted the Housing Crisis Act of 2019 ("HCA"), also known as SB 330 (Chapter 654, Statutes of 2019), on October 9, 2019, as a response to the housing crisis in California. The provisions of the HCA were later extended through SB 8 (Chapter 161, Statutes of 2021), signed by Governor Newsom on September 16, 2021.

One aspect of the HCA involves limitations on making changes to land use or zoning that would reduce residential density or the intensity of land uses compared to what was allowed under the regulations in effect on January 1, 2018. The law includes various factors in its definition of "less intensive use," including reductions in FAR.

Currently, the Campus permits residential care facilities. In fact, the City has identified potential locations for such facilities on the BCHD Campus to ensure compliance with SB 330. However, the proposed 0.75 FAR, which imposes stricter limitations on the Campus beyond what was allowed on January 1, 2018 likely violates the HCA.

H. THE CITY FAILED TO PROVIDE BCHD WITH AN ADEQUATE OPPORTUNITY TO BE INVOLVED IN THE PREPARATION OF THE GENERAL PLAN UPDATE, AS REQUIRED BY GOV. CODE §§ 65351, 65352, BEFORE BEING SUBMITTED TO ENVIRONMENTAL REVIEW.

According to Government Code § 65351, the City is required to involve public agencies in the preparation of any amendment to the General Plan. Furthermore, Government Code § 65352 mandates that the City refer any proposed action to amend the General Plan to specified governmental entities, including any special district, such as BCHD, that may be significantly affected by the proposed amendment. Each of these governmental agencies must be given a minimum of 45 days to review and comment on the proposed amendment.

BCHD did not receive any notice of the General Plan update, including the proposed maximum FAR until being served with the Notice of Preparation of Draft EIR. By failing to involve BCHD in the process, the City allowed land use practices that will compromise BCHD's ability to continue its mission of providing necessary public services, including preventative health care to the City and surrounding community, to be included in the proposed General Plan update that is being submitted for environmental review.

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In summary, given the numerous constitutional, statutory, and procedural infirmities associated with the proposed 0.75 for the Campus (as set forth above), we trust that the City will act appropriately and remove the maximum FAR for the Campus and, instead, leave the matter to

the City's design review, as currently is the case. Alternatively, the City should ensure that a uniform maximum FAR of 1.25 is applied uniformly to all similarly situated properties with a public or institutional land use designation and zoned C-PF.

We appreciate your consideration of BCHD's views on this matter. In the meantime, please do not hesitate to contact me with any questions concerning this correspondence.

Very truly yours,

RUTAN & TUCKER, LLP

Joseph D. Larsen

JDL

cc:
Tom Bakaly, CEO, Beach Cities Health District (Tom.Bakaly@bchd.org)
Monica Suua, CFO, Beach Cities Health District (Monica.Suua@bchd.org)
Michael W. Webb, City Attorney, City of Redondo Beach (Michael.Webb@redondo.org)

ATTACHMENT “3”

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July 15, 2024

VIA E-MAIL AND
FIRST CLASS MAIL

Michael W. Webb, Esq. Michael.Webb@redondo.org
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City of Redondo Beach
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Re: Disqualification of Planning Commissioner Sheila Lamb

Dear Mr. Webb:

As you know, this office represents Beach Cities Health District ("BCHD"), a public agency that provides a wide range of preventive health services to South Bay residents, including those in the City of Redondo Beach (the "City"). BCHD is extremely concerned by some of the actions of one of the City's planning commissioners, Sheila Lamb, concerning BCHD's 9.7-acre campus at 514 North Prospect Avenue (the "Campus"). Commissioner Lamb's public opposition to the Campus and involvement with the City's General Plan Advisory Committee ("GPAC") over several years disqualifies her from participating in any Planning Commission proceedings involving the Campus, including the proposed update to the General Plan.

BACKGROUND

The Campus provides essential health and wellness services to the residents of the City and surrounding communities. BCHD seeks to replace its aging and seismically deficient buildings on the Campus, improve service delivery, and create a more sustainable and resilient Campus. However, the City proposes to update its General Plan with a maximum Floor Area Ratio (FAR) of 0.75 on the Campus, without any clear justification. This would severely limit BCHD's ability to modernize the Campus and jeopardize its ability to provide essential public health services to the Beach Cities area.

Commissioner Lamb has publicly and repeatedly expressed her opposition to the Campus project over several years, through opinion letters, public meetings, and emails. She has also actively supported candidates who oppose the project in local elections. Her unwavering stance and actions raise serious doubts about her impartiality and objectivity as a Planning Commissioner. Commissioner Lamb's demonstrated bias and influential role in the General Plan update threaten the fair and transparent review of the Campus project. Indeed, BCHD suspects that Commissioner Lamb used her position as a member of GPAC to influence those who assisted in preparing the

draft General Plan to include the proposed 0.75 FAR to undermine BCHD's attempts to modernize the Campus.

As you know, the GPAC provides input and recommendations on the General Plan update. For some inexplicable reasons, Commissioner Lamb served on the GPAC while simultaneously serving as a member of the Planning Commission. Those two offices are incompatible considering that the Planning Commission is charged with considering the recommendations of the GPAC. Regardless, as a GPAC member, Commissioner Lamb had ample opportunity to influence the preparation of the draft General Plan, particularly the proposed FAR limitation. BCHD is concerned that Commissioner Lamb's involvement in the GPAC compromised the integrity and objectivity of the General Plan update process concerning BCHD and the Campus.

For the reasons set forth herein, BCHD respectfully requests that Commissioner Lamb be disqualified from participating in any Planning Commission proceedings involving the Campus project, including the consideration of the General Plan update. BCHD believes that Commissioner Lamb's disqualification is necessary to ensure a fair and unbiased evaluation of the proposed General Plan vis-à-vis the Campus and BCHD. BCHD also believes that Commissioner Lamb's disqualification is in the best interest of the public health and welfare of the Beach Cities residents, who rely on BCHD's services and programs.

IMPLICATIONS OF SHEILA LAMB'S SIMULTANEOUS ROLES IN GPAC AND PLANNING COMMISSION: UNDERMINING TRUST AND CONFIDENCE IN THE GENERAL PLAN UPDATE.

BCHD is concerned about the apparent conflict involving Sheila Lamb, who served as a member of both the GPAC and the Planning Commission. The GPAC was tasked with making recommendations to the Planning Commission (see City Resolution No. CC-1612-122), which is responsible for reviewing and approving the General Plan Update before it is presented to the City Council.

Section 2-9.100(c) of the City's Municipal Code expressly prohibits members of the Planning Commission from simultaneously serving on other boards or commissions. Despite this, Commissioner Lamb served on the GPAC while also being a Planning Commissioner. As a member of both the GPAC and the Planning Commission, Commissioner Lamb held incompatible offices. The doctrine of incompatible offices prohibits a public official from holding two different public offices simultaneously if the offices have overlapping and conflicting public duties. In this case, the roles of a GPAC member and Planning Commissioner clash significantly due to their respective responsibilities. The GPAC advises the Planning Commission, which has the authority to accept, modify, or reject the GPAC's recommendations. This situation compromises Commissioner Lamb's ability to impartially fulfill the duties of both roles.

Furthermore, allowing Commissioner Lamb to participate in the General Plan Update process in both capacities is not in line with public policy. It undermines public trust and the perceived transparency of the process.

Notably, as a GPAC member, Commissioner Lamb sought to remove references to BCHD from the General Plan. This action contradicts the charge in the City's Statement on GPAC Duties and Responsibilities that a GPAC member, "irrespective of individual perspectives or preferences, seek the benefit of the entire community in recommendations." Commissioner Lamb's evident hostility toward BCHD, as detailed below, is not reflective of someone who is concerned about the community. Rather, it is indicative of someone driven by personal bias. As a result, Commissioner Lamb should be disqualified from considering the draft General Plan Update as a Planning Commissioner.

COMMISSIONER LAMB HAS DEMONSTRATED HER OPEN OPPOSITION TO THE CAMPUS REGARDLESS OF ITS MERITS, AND SHOULD THEREFORE BE DISQUALIFIED FROM HEARING OR PARTICIPATING IN ANY PROCEEDINGS INVOLVING THE CAMPUS.

For several years, Commissioner Lamb has expressed frequent and ardent opposition to the Campus. Commissioner Lamb has authored several opinion letters in the Daily Breeze and Easy Reader, local community news sources, expressing her position against the Campus. Excerpts from these pieces include:

- August 8, 2019: Commissioner Lamb called the Campus Project an "overpriced showpiece" and accused it of coming with "significant negative health impacts[.]" She also contended that the Campus Project would "cause a drain on city services and an increase in city expenses," cause "privacy and lighting issues, and accused BCHD of not presenting "clear evidence that there is a community need for this facility[.]" Available at https://easyreadernews.com/letters-to-the-editor-8-15-19/.

- August 8, 2019: Commissioner Lamb argued that "[i]nstead of another senior housing project that we don't need, residents of RB want a facility that will improve the health and well-being of all residents, young and old. We want a facility that doesn't come with the magnitude of negative impacts that are evident in this current [Campus Project] proposal." Available at https://www.dailybreeze.com/2019/08/08/letters-senior-living-foilers-beware-smoking-week-of-august-8/.

- August 29, 2019: Commissioner Lamb asserted that "BCHD needs to come up with an alternative plan for the property [to be used for the Campus Project] that serves the entire community and celebrates the worth of elders not demeans them as merely commodities in the marketplace." Available at https://www.dailybreeze.com/2019/08/29/letters-emoji-house-seniors-county-fire-week-of-august-29/.

- October 23, 2019: Commissioner Lamb contended "[w]ith no significant evidence of a community benefit and substantial evidence of negative community impacts over the 15 year building period, [the Campus Project] should be vigorously opposed by Beach Cities residents." Available at https://www.dailybreeze.com/2019/10/23/letters-candidate-letters-rb-sales-tax-desalination-week-of-october-24/.

- November 28, 2019: Commissioner Lamb wrote that the Campus Project is "completely unnecessary and should be vigorously opposed by Redondo Beach residents." Available at https://www.dailybreeze.com/2019/11/28/lettersbchd-expenditures-desalination-week-of-november-28/.

- January 2, 2020: Commissioner Lamb wrote that "Beach Cities Health District is planning a massive, unnecessary construction project in Redondo Beach that will negatively impact the health of community residents." She went on to opine that the construction of the Campus Project "will harm the health of our residents, especially our children and older adults" due to pollution and that the "BCHD board is putting residents' health at risk with this development plan and in doing so they compromise the integrity of their mission to improve the health of our community." Available at https://easyreadernews.com/letters-to-the-editor-1-2-2020/.

- February 13, 2020: Commissioner Lamb challenged the need for an assisted living facility, stating: "assum[ing] that a growing senior population will require more assisted living facilities, let alone high end facilities, is a speculative marketing strategy, not a fact." Available at https://easyreadernews.com/letters-to-the-editor-2-13-2020/.

- February 19, 2020: Commissioner Lamb opposed BCHD's decision to partner with an assisted living facility through the Campus Project by stating that "BCHD must rethink its 'need' for additional revenue and abandon this RISKY investment strategy." Available at https://www.dailybreeze.com/2020/02/19/letters-mb-athletic-complex-costs-vaping-ban-measure-fd-week-of-february-20/.

- February 20, 2020: Commissioner Lamb argued that the "proposed senior housing project [that is part of the Campus Project] is not in the best interests of Redondo Beach." Available at https://easyreadernews.com/letters-to-the-editor-2-20-20202/.

- July 2, 2020: Commissioner Lamb criticized BCHD's communications regarding the Campus Project, stating that "[w]e must not fall for BCHD's marketing gimmicks and we must say no to this new development plan." Available at https://easyreadernews.com/letters-to-the-editor-7-2-2020/.

- September 17, 2020: Commissioner Lamb stated "[q]uite simply, we don't need a Healthy Living Campus" and that now is not the time for "building a campus we don't need."

Available at https://www.dailybreeze.com/2020/09/17/letters-face-masks-bchd-campus-and-candidate-support-letters-week-of-september-17/.

- March 31, 2021: Commissioner Lamb advocated that "Redondo Beach residents must reject BCHD's plan to privatize our public land and we must insure that any use of our public land has a clear benefit for all members of the community." Available at https://easyreadernews.com/letters-to-the-editor-april-1-hermosaparking-redondo-garden-manhattan-apology-let-er-rip-peterson/.

- April 1, 2021: Commissioner Lamb argued that "[t]he BCHD development proposal monetizes public land, not for use by the public, but for the sole benefit of a select few. This is an improper use of our public land . . . . Redondo Beach residents must reject BCHD's plan to privatize our public land and we must ensure that any use of our public land has a clear benefit for all members of our community." Available at https://www.dailybreeze.com/2021/04/01/letters-bike-lanes-bchd-plans-and-bruces-beach-apology-week-of-april-1/.

- June 3, 2021: Commissioner Lamb wrote that "BCHD must put its financial house in order and leave public land for public uses[,]" implying that BCHD should not pursue the Campus Project, which is a private-public partnership. Available at https://www.dailybreeze.com/2021/06/03/letters-to-the-editor-week-of-june-3/.

- August 26, 2021: Commissioner Lamb asserted that construction of the assisted living project will "significantly disrupt the lives of residents for many years" and that BCHD should keep its administrative costs low instead of "financializing public land for revenue gain and massive construction disruption." Available at https://easyreadernews.com/easy-reader-letters-to-the-editor-aug-26-2021-vaccination-questions-school-masks-trees-in-the-city/.

- September 5, 2021: in a comment on an Easy Reader article (not in an op-ed), Commissioner Lamb set forth her view that BCHD was improperly allocating revenue to administrative costs and "[t]here is no reason we should be subsidizing these [Campus Project] operations." Available at https://easyreadernews.com/beach-city-health-district-to-vote-on-healthy-living-campus-eir-in-redondo-beach/.

- October 1 and September 16, 2021: Commissioner Lamb called into question whether BCHD is "a good steward of public funds" in comments about the Campus Project. Available https://www.dailybreeze.com/2021/09/16/letters-to-the-editor-week-of-september-16/. Tom Bakaly, BCHD CEO, responded to this letter on September 23, pointing out errors in Commissioner Lamb's letter. Available at https://www.dailybreeze.com/2021/10/01/letters-to-the-editor-week-of-sept-23/. Commissioner Lamb, still engaged in the discussion, followed up on October 1, asking for

more information about how BCHD allocates funding for community programs and services. Available at https://www.dailybreeze.com/2021/10/01/letters-to-the-editor-week-of-september-30/.

Additionally, Commissioner Lamb has made her opposition to the Campus apparent during various public meetings where she has made statements on the record. Examples of Commissioner Lamb's public statements include:

- November 20, 2019, Regular Meeting of the Board of Directors of BCHD: Commissioner Lamb stated the Campus plan is "over the top" and "overkill" and comes at "too great a cost." She concluded that the project should be "vigorously opposed by Redondo Beach residents." A video of the meeting is available online at https://www.bchd.org/board-directors-meetings (starting at minute 10, 50 seconds).

- January 22, 2020, Regular Meeting of the Board of Directors of BCHD: Commissioner Lamb discussed BCHD's "unnecessary massive project that [she] opposes" referring to the Campus Project. She went on to say that "[w]e must say no to unnecessary construction projects that will harm the health of our residents, especially children and older adults." A video of the meeting is available online at https://www.bchd.org/board-directors-meetings (starting at minute 41, 37 seconds).

- February 26, 2020, Regular Meeting of the Board of Directors of BCHD: Commissioner Lamb demanded that the BCHD Board of Directors "abandon the risky investment strategy" of partnering with an assisted living facility for the Campus. Meeting minutes are available at https://bchd.granicus.com/MinutesViewer.php?view_id=2&clip_id=389&doc_id=843422f8-a475-11ea-9e08-0050569183fa.

- June 17, 2020, Special Meeting of the Board of Directors of BCHD: Commissioner Lamb, referring to the Campus Project, stated that new construction is not necessary and will not benefit the public. Meeting minutes are available at https://bchd.granicus.com/DocumentViewer.php?file=bchd_a75c34671bec7bbe69534ca0cfdc7edb.pdf&view=1.

- March 24, 2021, Special Meeting of the Board of Directors of BCHD: Commissioner Lamb stated that data indicated that there is a lack of demand or need for BCHD programs or services and questioned the justifications for constructing a Campus that she believed residents would not use. Meeting minutes are available at https://bchd.granicus.com/DocumentViewer.php?file=bchd_1f0bd09dcb9bc1ac16190acb65598f2a.pdf&view=1.

- September 8, 2021, Regular Meeting of the Board of Directors of BCHD: Commissioner Lamb made comments about the Final Environmental Impact Report ("FEIR") for the Campus Project. Among other comments, she stated that although there may be demand for RCFEs near a beach, there is no evidence demonstrating a need for such facilities. A video of the meeting is available online at https://www.bchd.org/board-directors-meetings (starting at one hour, 16 minutes and 28 seconds).

Furthermore, Commissioner Lamb has made her opposition to the Campus apparent in emails to Paul Novak, Executive Officer of the Local Agency Formation Commission for the County of Los Angeles. Examples of Commissioner Lamb's email communications with Mr. Novak include:

- November 3, 2020 email: "Beach Cities residents continue to have major concerns regarding the financial activities of this public entity, especially in light of their recent actions to develop a $250,000,000 Healthy Living Campus."

- December 28, 2020 email: "BCHD claims that the organization will soon face a revenue shortfall and must build a Residential Care for the Elderly facility in order to increase revenues to meet the projected expenses. BCHD asserts that many of the programs and services listed above will be discontinued if the RCFE facility isn't built. Many in my community of Redondo Beach are opposed to this RCFE development. We have circulated a petition gaining 1,200 signatures of those who are opposed to the development. We believe that the remedy for fixing the revenue shortfall is addressing the fiscal and operational inefficiencies of the district."

Commissioner Lamb's repeated expressions of opposition against the Campus Project have gone beyond the mere expression of personal opinion. They represent instead a concerted effort to advocate against the BCHD's Campus Project and encourage others to oppose it. This is reflected in many of Commissioner Lamb's statements cited above in which she urges residents to oppose the Campus Project.

Commissioner Lamb's opposition to BCHD and the Campus Project is also evidenced by tangible actions she has taken to stop it. For example, in 2020, she actively supported two candidates for election to the BCHD Board who expressed concern over the Campus Project and who presumably would vote against it. See, e.g. https://www.dailybreeze.com/2020/10/22/letters-more-candidate-support-government-transparency-and-missing-yard-signs-week-of-october-22/; see also https://easyreadernews.com/letters-to-the-editor-10-22-2020/.

Even more significant are her activities concerning the City and its update of the General Plan. On May 4, 2021, she spoke before the City Council regarding the Land Use Definitions and the P-CF zones as they relate to residential care facilities for the elderly. Since the Campus is zoned P-CF and BCHD is planning to build an RCFE on the property, she knew her comments would

directly impact the BCHD project. In an apparent attempt to kill the project, she expressly advocated that RCFEs "shouldn't be allowed in the P or PCF zones . . ." Meeting minutes available at https://redondo.legistar.com/View.ashx?M=M&ID=824662&GUID=A634A98F-17B9-4E5AAF6C-618F58068B8D.

Finally, BCHD has good reason to believe that Commissioner Lamb will not change her viewpoint regarding BCHD and the Campus Project or relent in her opposition to it. In a conversation with Tom Bakaly, the Chief Executive Officer of BCHD, she stated: "Tom, you will never wear me down on this project" and made it clear that her opposition would never change. BCHD believes these are not the words of a person who has an open mind and is willing to hear and consider evidence fairly and impartially.

LEGAL STANDARD: PROCEEDINGS BEFORE PLANNING COMMISSIONS ARE INVALID IF THERE IS A PROBABILITY OF ACTUAL BIAS

Proceedings before planning commissions are invalid where there is an "unacceptable probability of actual bias" on the part of the planning commission. (*Nasha v. City of Los Angeles* (2004) 125 Cal.App.4th 470.) Importantly, "the rule against bias has been framed in terms of probabilities, not certainties." (*Woody's Group, Inc. v. City of Newport Beach* (2015) 233 Cal.App.4th 1012, 1021.) The law does not require proof of actual bias. (*Ibid.*)

Nasha, a leading case addressing what constitutes an unacceptable probability of actual bias is especially relevant here. In *Nasha*, a member of the Southern Valley Area Planning Commission wrote an article attacking a project that the planning commission was scheduled to consider. (*Nasha, supra*, 125 Cal.App.4th at 473.) The project at issue was a five-residence development project, which a city planning director approved. (*Ibid.*) However, a resident and a conservancy advocacy group appealed the city planning director's decision to the planning commission, arguing that the project would have adverse impacts on wildlife and wildlife habitat. (*Id.* at p. 475.)

While the approval of the development project was pending before the planning commission, a member of the planning commission, Commissioner Lucente, wrote an article hostile to the project, which was published in a homeowner's association newsletter. (*Nasha, supra*, 125 Cal.App.4th at 476.) The article was unsigned, but Commissioner Lucente later admitted that he wrote it. (*Ibid.*) Commissioner Lucente also invited the resident who appealed the city planning director's decision to a homeowner's association meeting. (*Ibid.*) Commissioner Lucente introduced the resident at the meeting, and the resident spoke against the development project. (*Ibid.*) Commissioner Lucente did not disclose his authorship of the article or his contact with the resident appealing the city planning director's decision during the planning commission hearing on the project. (*Id.* at p. 477.)

The planning commission overturned the city planning director's approval of the project. (*Nasha, supra*, 125 Cal.App.4th at 477-478.) Nasha, the entity that owned the land the project sought to develop, sought reconsideration and eventually filed a writ of mandate to overturn the planning commission's decision. (*Id.* at pp. 478-479.) Among other things, Nasha argued that Commissioner Lucente's conduct amounted to a reasonable appearance of bias requiring recusal and that Commissioner Lucente's vote and the planning commission's decision should be set aside. (*Id*. at pp. 479-480.) The trial court entered judgment against Nasha. (*Id.* at p. 481.)

The Court of Appeal ruled in favor of Nasha, reversing the trial court's ruling. (*Nasha, supra,* 125 Cal.App.4th at 482-486.) The Court concluded that the planning commission's decision was "tainted by bias and must be vacated." (*Id*. at pp. 485-486.) The Court held that Nasha established "an unacceptable probability of actual bias" on the part of Commissioner Lucente with "concrete facts." (*Id.* at p. 482; see id. at p. 483.)

The Court reasoned that the newspaper article Commissioner Lucente wrote attacking the project, on its own, gave rise to an unacceptable probability of bias. (*Nasha, supra*, 125 Cal.App.4th at 483-484.) The Court's opinion included the portions of the "offending article" to illustrate that the article "clearly advocated a position against the project, which it characterized as 'a threat to wildlife corridor[:]'"

> MULTIVIEW DRIVE PROJECT THREAT TO WILDLIFE CORRIDOR [¶] A proposed project taking five legal lots totaling 3.8 acres for five proposed large homes with swimming pools served by a common driveway off Multiview Drive is winding its way through the Planning process.... [¶] After wildlife leaves Briar Summit heading eastward they must either head south towards Mt. Olympus or north to the slopes above Universal City. The Multiview Drive site is an absolutely crucial habitat corridor. Please contact Paul Edelman with the Conservancy at 310/ ... or Mark Hennessy who lives adjacent to the project at 323/ ... if you have any questions."

(*Id*. at p. 484.) Although the "offending article" seems rather restrained compared to Commissioner Lamb's statements, the Court nevertheless found that it rose to the level of an unacceptable probability of actual bias. Commissioner Lamb's statements "clearly advocated a position against the project" in terms far more explicit than Commissioner Lucente's. Commissioner Lamb has plainly stated that the Campus Project should be "vigorously opposed by Redondo Beach residents"; she has also argued that the Campus Project is "unnecessary" and there is a lack of "demand" for it. Like Commissioner Lucente, Commissioner Lamb has made such statements in a local publication, but Commissioner Lamb has gone even further than Commissioner Lucente. Commissioner Lamb has made multiple statements, not just one, and she

made her statements in two publications circulated throughout the city, in her name, not just anonymously in a neighborhood association newsletter.

Other cases have discussed the existence of actual or apparent bias where an official opposed a project outside of the proceedings regarding the project. For example, in *Woody's Group, supra*, 233 Cal.App.4th, the Court concluded that there was an unacceptable probability of actual bias on the part of a city councilmember because, in part, of an email the city councilmember sent to the city clerk seeking to appeal a planning commission decision to award a CUP. The email stated that the councilmember sought the appeal because "he 'strongly believ[ed]' the 'operational characteristics requested in the application and the Planning Commission's decision are inconsistent with the existing and expected residential character of the area and the relevant policies of the voter approved 2006 General Plan.'" (*Id.* at p. 1017.) The Court reasoned that the email showed the city councilmember "was strongly opposed to the planning commission's decision on [the] application" so "as in *Nasha*, he 'took a position against the project.'" (*Id.* at pp. 1022-1023.)

Likewise, Commissioner Lamb has taken an advocacy position against the Campus Project, and in terms more explicit than in *Woody's Group*. Commissioner Lamb has expressed more than her belief; she has baldly stated that the Campus Project is "an improper use of [] public land" and she has urged "Redondo Beach residents [that they] must reject BCHD's plan to privatize our public land." She has further stated that "[q]uite simply, we don't need a Healthy Living Campus" and that now is not the time for "building a campus we don't need." Commissioner Lamb's strong opposition to the Campus meets the standard in *Woody's Group*.

Her statements demonstrate that she has not only prejudged the Campus Project but that she has advocated against it by inducing others to oppose it, too. And, as evidenced by her statement to Tom Bakaly that "you will never wear me down on this project", BCHD has no reason to believe that she will relent in her opposition. Therefore, BCHD believes there is an "unacceptable probability" that she will bring actual bias to her role as a member of the Planning Commission when it considers matters related to the Campus.

Finally, as discussed above, BCHD is very concerned about the influential role Commissioner Lamb has had in the General Plan update process and how she used her position to advocate for a 0.75 FAR as a backdoor attempt to defeat the Campus project. Such a backdoor attempt to defeat the Campus project violates BCHD's right to due process and equal protection. (*Arnel Development Co. v. City of Costa Mesa* (1981) 126 Cal.App.3d 330, 337; *Fry v City of Hayward* (N.D. Cal. 1988) 701 F.Supp. 179; *Herrington v. County of Sonoma* (9th Cir. 1987) 834 F.2d 1488

COMMISSIONER LAMB SHOULD BE DISQUALIFIED FROM CONSIDERING THE DRAFT GENERAL PLAN UPDATE

For the reasons set forth herein, BCHD respectfully requests that Commissioner Lamb be disqualified from participating in any Planning Commission proceedings involving the Campus, including the consideration of the General Plan update.

We appreciate your consideration of this important matter and look forward to your response. We are available to speak with you or meet with you at your convenience to discuss these issues if you believe it would be helpful.

Very truly yours,

RUTAN & TUCKER, LLP



Joseph D. Larsen

JDL

cc: Cheryl Park, Assistant City Attorney, City of Redondo Beach (Cheryl.Park@redondo.org)
Tom Bakaly, Chief Executive Officer, Beach Cities Health District (Tom.Bakaly@bchd.org)

ATTACHMENT "4"

IV Rob Gaddis

Dear BCHD Board of Directors,

I oppose the proposed BCHD Assisted Living Facility proposed in South Redondo. The proposed Beach Cities Health District project on Prospect is way too large for our neighborhood. We neighbors do not want a supersized project of a huge building hulking over our homes, schools and parks. It's just plain too big. The increased traffic activity will congest our streets, and the high building will block our sun.

We love seniors, but we have plenty of elderly-care institutions in Redondo Beach. It's time for other member cities of the District to take on more of senior-living requirements, rather than concentrating it in a giant building in our neighborhood. This would convert this residential neighborhood into an institutional neighborhood.

Thank you,

Rob Gaddis
Beryl Heights Neighborhood
Redondo Beach, CA

ATTACHMENT “5”

Wayne Craig
October 15, 2020 ·

If you need another reason to not vote for any of the BCHD incumbents look no further than the letter of endorsement from Arnette Travis. She is the "Court Confirmed" shill who can't keep her stories straight and according to legal experts committed perjury on the witness stand.

It's also the whole community that is against BCHD's bloated and unnecessary $400 Million Dollar "Wealthy Seniors Last Rites Housing" project not just a few people as Travis claims. We would have thought Travis would stop using that same tired phrase since it worked so well for her with trying push the CenterCal Harbor Mall on Redondo Beach residents.

Instead of touting failed BCHD board members (Vanessa Poster, Jane Diehl, and Vish Chatterji) maybe Travis and her accomplice Chris Voisey should instead focus on paying back the nearly $1.5M in legal fees they owe after being named "Court Confirmed Shills" in the thinly veiled SLAPP lawsuit they allegedly filed on their own but was actually financed by CenterCal, its CEO Fred Bruning, and Gregory Geiger who is on the board at Torrance Memorial Hospital. (See link) http://www.rescueourwaterfront.org/.../judgement-day.../

I urge everyone to watch the forum and see how the current board has no idea if the 40 programs they are paying for are even cost effective. https://www.youtube.com/watch?v=2ePOD95YvWk

Both Diehl and Poster had to continually refer to their crib notes and "text messages from who knows" to answer things they should know from serving on the board. Poster was especially out of touch since she couldn't articulate her work on the board for over a quarter century. That and the fact Poster forgot to mention on occasion she ran unopposed.

Vish as always likes to tout his past experience but one has to ask where has he applied it to his time on the board the past 4 years? Plus he couldn't even answer the question about how the healthy living campus would disproportionately impact Redondo Beach. Most interesting was he tried to distance himself from the "Wealthy Seniors Last Rites Housing" project he has been pushing for so long. Vish tried to pawn it off as something that started well before he sat on the BCHD Board as if that explains his aggressive support.

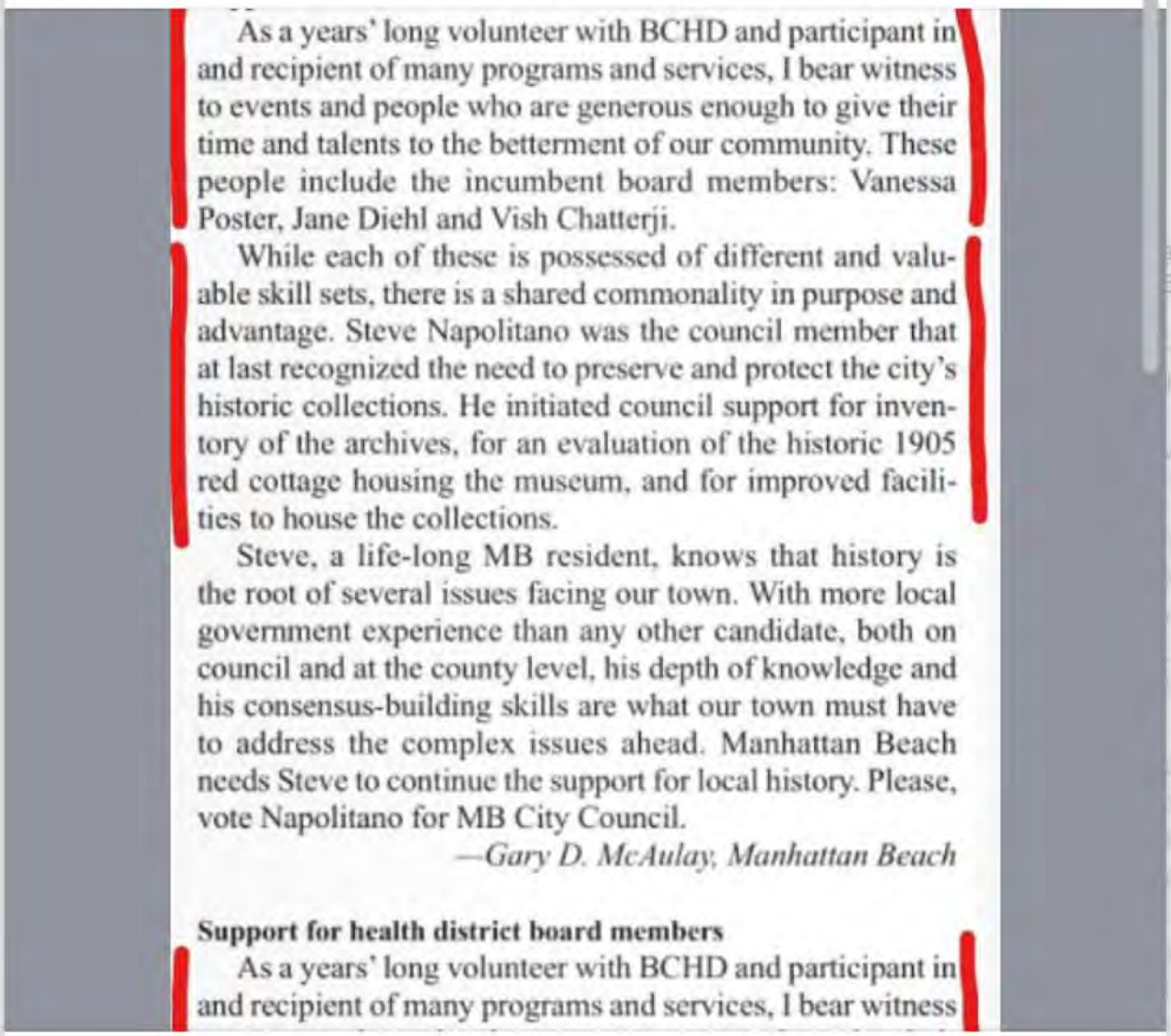
Please watch for yourself and you will see why Karen Komatinsky and Dr Martha Koo are who we need to be on the BCHD board.



Wayne's Post

Redondo Beach Neighbors For a Better Artesia Blvd.
Wayne Craig · October 15, 2020 ·

Who's writing the BCHD Support Letters?
Take a look at a pic of two letters printed today in the Beach Reporter and at the areas highlighted in red. One is from a resident of Manhattan Beach and the other Redondo Beach. If they look familiar they are word for word in the first two paragraphs.
We always doubted "court confirmed" Shill Arnette Travis was actually writing letters to the editor. Now we have proof someone else is doing it and apparently forgot to tell the recipients to make edits so they don't look exactly the same.
Is it the same PR firm BCHD hired to promote the Wealthy Dying Center? Maybe someone can make a public records request and see if our tax dollars are being spent on this as well.



As a years' long volunteer with BCHD and participant in and recipient of many programs and services, I bear witness to events and people who are generous enough to give their time and talents to the betterment of our community. These people include the incumbent board members: Vanessa Poster, Jane Diehl and Vish Chatterji.

While each of these is possessed of different and valuable skill sets, there is a shared commonality in purpose and advantage. Steve Napolitano was the council member that at last recognized the need to preserve and protect the city's historic collections. He initiated council support for inventory of the archives, for an evaluation of the historic 1905 red cottage housing the museum, and for improved facilities to house the collections.

Steve, a life-long MB resident, knows that history is the root of several issues facing our town. With more local government experience than any other candidate, both on council and at the county level, his depth of knowledge and his consensus-building skills are what our town must have to address the complex issues ahead. Manhattan Beach needs Steve to continue the support for local history. Please, vote Napolitano for MB City Council.

—Gary D. McAulay, Manhattan Beach

Support for health district board members

As a years' long volunteer with BCHD and participant in and recipient of many programs and services, I bear witness

https://easyreadernews.com/letters-to-the-editor-10-15-2020/?fbclid=IwY2xjawFfx3tleHRuA2FIbQIxMQABHZ2gTG_GIhWuZK6fZaFLecbB_fnaXoOgvh2yJaJJ2Tc1uOu0oMQ-eZf_oA_aem_NRV6aVOv

Add a comment...

Wayne Craig

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I urge everyone to watch the forum and see how the current board has no idea if the 40 programs they are paying for are even cost effective. https://www.youtube.com/watch?v=2ePOD95YvWk

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Vish as always likes to tout his past experience but one has to ask where has he applied it to his time on the board the past 4 years? Plus he couldn't even answer the question about how the healthy living campus would disproportionately impact Redondo Beach. Most interesting was he tried to distance himself from the "Wealthy Seniors Last Rites Housing" project he has been pushing for so long. Vish tried to pawn it off as something that started well before he sat on the BCHD Board as if that explains his aggressive support.

Please watch for yourself and you will see why Karen Komatinsky and Dr Martha Koo are who we need to be on the BCHD board.

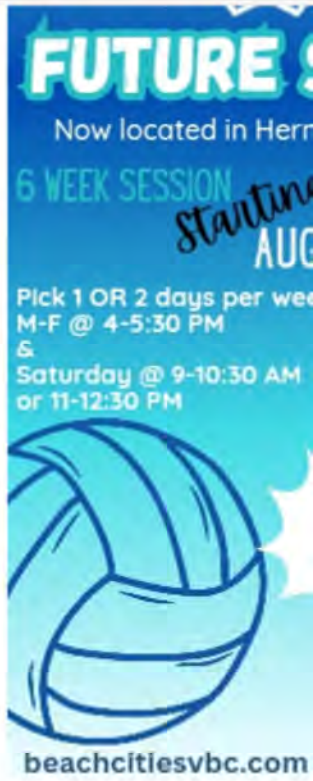
Like · Reply · 3y

Mark Nelson

80% of the BCHD tenants will be from outside the Beach Cities that own BCHD. 95%+ will be from outside 90277 that absorbs the negative impacts and environmental and economic injustice of BCHD and SBH. At least SBH had an ER. BCHD will do yoga on you if you are hit by a car .... What a poor trade BCHD was for the neighborhood compared to an emergency hospital.

Like · Reply · 3y

Facebook Comments Plugin





From: Robin Potchka
To: CityClerk
Date: Monday, January 19, 2026 8:04:53 AM

You don't often get email from drpotchka@gmail.com. Learn why this is important

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

I oppose any increase in FAR for bchd.

Dr. Robin Potchka
Jane Addams Middle School
Grade 7 Teacher

From: Stephen Parker
To: CityClerk; Zein Obagi; Scott Behrendt; Paige Kaluderovic; Brad Waller; Chadwick B. Castle; Joy Ford
Subject: Making my voice heard
Date: Monday, January 19, 2026 10:41:04 AM

You don't often get email from sparker100@verizon.net. Learn why this is important

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Please pass on the city council members for their January 20th meeting

***Regarding Agenda Item N1,* I SUPPORT limiting BCHD to a 0.5 or 0.75 FAR ONLY. BCHD's planned OVERDEVELOPMENT with 100% Private Developers should not be SUPERSIZED.**

George Stephen Parker
Lomax Lane
Redondo Beach 90278

From: Marcia Gehrt
To: CityClerk
Subject: Oppose any Increase in the FAR
Date: Tuesday, January 20, 2026 10:01:43 AM

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

Redondo Beach City Council:

I SUPPORT a 0.5 to 0.75 FAR cap for BCHD and oppose any increase in FAR for BCHD. Any increase for BCHD would be excessive for their non-emergency services and out of scale with the character of the City and surrounding areas.

Thank you for your consideration,

Marcia Gehrt

From:	Rosann Taylor
To:	CityClerk; Zein Obagi; Scott Behrendt; Paige Kaluderovic; Brad Waller; Chadwick B. Castle; Joy Ford
Cc:	Geoff Gilbert
Subject:	Please limit the FAR for BCHD to 0.5 or 0.75 FAR only. Do not allow BCHD a FAR of 1.25 or more.
Date:	Monday, January 19, 2026 11:49:54 PM

You don't often get email from rosanntaylor@mac.com. Learn why this is important

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

I live nextdoor to the BCHD. I don't want to see our public land leased to a private developer to build an enormous building for their financial gain. We have been objecting to this for how many years!?! A huge structure towering over us will be a blight to the residential areas which surround it and to the character of Redondo Beach as well.

I beseech the City to **protect us homeowners** ~ our quality of life and our property values.

Please DO NOT hand the BCHD a FAR of 1.25 or more. It will give them a green light to build whatever they want and they'll be off and running

Please limit the FAR for BCHD to 0.5 or 0.75.

Also, I agree with my neighbor, Geoff Gilbert who states:

Once again Beach Cities Health District is pushing the City of Redondo Beach to allow a much larger "Floor Area Ratio"
for the private, for profit, elder care and independent living housing development it wants built next door to our homes.

The FAR limits the size of the building which the developer plans to build. The City has proposed an FAR (building to land size ratio)
of 0.5 to 0.75 to apply to this type of development **while BCHD wants the limit to be 1.25 to even 1.50.**

The developer "must" have this "supersize" construction authority to build this huge, expansive facility.
We will again have the prospect of having a massive multi story structure overlooking our homes and even more
traffic and noise from this commercial enterprise. And, as they have planned to do in the past, BCHD could remove the green
zone that now exists between the facility and our street for part of this construction. This will also significantly reduce the values of our homes, something BCHD has never addressed in its very
flawed environmental impact report that they themselves commissioned and certified.

Aloha! ♀

From:	Stop BCHD
To:	James Light; CityClerk; cityclerk@manhattanbeach.gov; cityclerk@hermosabeach.gov; Paige Kaluderovic; Mike Witzansky
Subject:	Public Comment - Disregard BCHD Board Member Poster - She has a history of lying to the Council
Date:	Monday, January 19, 2026 6:33:15 PM

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We have noticed that BCHD Board Member Poster has commented on the FAR with the FOLLOWING:

Vanessa Poster at January 19, 2026 at 12:08pm PST Oppose

Regarding Agenda Item N1, I OPPOSE limiting only BCHD to a 0.75 FAR while allowing higher FARs for other public institutional uses such as City Hall. I SUPPORT a uniform 1.25 FAR for BCHD, City Hall and the Annex. I am so proud of the work BCHD does to support residents in all age groups from birth to death, helping people to live longer, happier lives with vitality until the end.

To be clear - the last time FAR came to the City Council, Poster LIED TO THE COUNCIL and stated ON THE RECORD that the City Attorney had admonished the Planning Commission due to targeting BCHD. That is a TOTAL lie.

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StopBCHD.com (StopBCHD@gmail.com) is a Neighborhood Quality-of-Life Community concerned about the quality-of-life, health, and economic damages that BCHDs 110-foot above the street, 800,000 sqft commercial development will inflict for the next 50-100 years. Our neighborhoods have been burdened since 1960 by the failed South Bay Hospital project and have not received the benefit of the voter-approved acute care public hospital since 1984.Yet we still suffer 100% of the damages and we will suffer 100% of the damages of BCHDs proposal.

From:	Mark Nelson (Home Gmail)
To:	CityClerk
Subject:	Public Comment - Mayor and Council - N1 "Oppose" and "Support" is inaccurate - people are confused about what each means.
Date:	Monday, January 19, 2026 8:22:22 PM

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The issue is confusing. Many of the "supports" has OPPOSE text. The statistic off of Granicus will either need to be ignored or hand tallied.

From:	Mark Nelson (Home Gmail)
To:	CityClerk; mike.witzanzky@redondo.org; Joy Ford; James Light; Scott Behrendt; Zein Obagi; Paige Kaluderovic; Brad Waller; Chadwick B. Castle
Subject:	Public Comment - No Increase in Public FAR Required: According to Public Meetings, the RBFD and RBPD replacements will be roughly the same size as existing buildings
Date:	Sunday, January 18, 2026 4:27:34 PM

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Apparently the City Council sized the bond measure such that it would only replace the RBFD and RBPD facilities in like size. That was the result of the Council's collective view that voters would not support any additional funding beyond the ask in the recent bond measure. If that is accurate, then the increase in FAR for the City facilities is unnecessary and should not be included in the General Plan. That would allow all Public use land to be 0.5 or 0.75 FAR.

From the Easy Reader:

Witzansky responded that the city did consider running a higher-priced bond, which could have included a larger new police station, all under one roof, no need for the annex. The estimate for that was $98 million, not including the two fire stations.

“We chose the (smaller scope) because, from a prudent calculation, we thought that’s what the residents would support…” he said. “In an ideal world we’d have another $50 million to play with."

From:	Stop BCHD
To:	Martha Koo; Jane Diehl; Noel Chun; Michelle Bholat
Cc:	CityClerk; cityclerk@hermosabeach.gov; cityclerk@manhattanbeach.gov; cityclerk@torranceca.gov; info; executiveoffice@bos.lacounty.gov; Holly J. Mitchell; Los Angeles County District Attorney"s Office
Subject:	Public Comment (all agencies) and Formal Written Complaint (BCHD Governance): BCHD is denying remote public participation
Date:	Thursday, January 15, 2026 11:47:46 PM
Attachments:	BCHD Retreat Agenda.pdf BCHD Retreat Agenda Pkt.pdf Beach Cities Health District.pdf Board of Directors Meetings - Beach Cities Health District.pdf

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Beach Cities Health District (BCHD, Redondo Beach, CA) has failed to provide public notice of a remote participation option for its Friday Jan 16, 8AM meeting. The meeting begins in less than 9 hours and BCHD cannot meaningfully mitigate its failure to notice remote participation.

This failure has denied the public the right to participate in the process of governance of BCHD, and the meeting must be cancelled and re-noticed properly.

At present, it is unclear if this is a failure on BCHD's part, or a willful violation. An investigation is required.

Attachment - posted Agenda, posted Agenda Pkt, PDF of BCHD Board meeting notice webpage, PDF of BCHD eComment webpage

All PDFs carry the date and time of their downloads at approximately 1145PM Pacific on Thursday 11/15/26

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StopBCHD.com (StopBCHD@gmail.com) is a Neighborhood Quality-of-Life Community concerned about the quality-of-life, health, and economic damages that BCHDs 110-foot above the street, 800,000 sqft commercial development will inflict for the next 50-100 years. Our neighborhoods have been burdened since 1960 by the failed South Bay Hospital project and have not received the benefit of the voter-approved acute care public hospital since 1984.Yet we still suffer 100% of the damages and we will suffer 100% of the damages of BCHDs proposal.

From:	Stop BCHD
To:	Joy Ford; CityClerk; cityclerk@manhattanbeach.gov; cityclerk@hermosabeach.gov; James Light; Paige Kaluderovic; Mike Witzansky; Scott Behrendt; Chadwick B. Castle; Brad Waller
Cc:	Kevin Cody; executiveoffice@bos.lacounty.gov; info; Residents Against Overdevelopment
Subject:	Public Comment All Agencies: Redline of BCHD Incorrect Statements in Bakaly Letter to Council
Date:	Sunday, January 18, 2026 5:49:20 PM
Attachments:	image.png image.png BCHD Claims Redline v1.pdf

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REDLINE OF BCHD'S FALSE CLAIMS TO THE CITY OF REDONDO BEACH

REDLINE OF BCHD'S CLAIMS TO THE CITY OF REDONDO BEACH

Mayor and City Council:

Like the City of Redondo Beach, Beach Cities Health District's (BCHD) mission is focused on serving the long-term and evolving needs of the community. Unlike the City, BCHD extends its services via ALLCOVE to a service area of 1.4M population. Likewise, only TWO (2) BCHD Programs require residency. All other are open to all comers, inside or outside the District. Public institutions like the City and BCHD have remained responsive to changing demographics, service delivery models and community priorities, and BCHD values planning frameworks that support this adaptability while remaining compatible with the community.

As the City Council continues its deliberations on the General Plan update, I'd like to share the following perspective as part of the broader discussion on public institutional uses and Floor Area Ratio (FAR) caps. As you know, state law calls for general plans to address land use for public buildings and grounds and to include standards related to population density and building intensity across all land use categories (California Government Code § 65302(a)).

While state law requires general plans to include standards addressing building intensity, **it does not require a FAR to meet this obligation**. FAR is one commonly used measure, but California Code § 65302(a) provides flexibility for cities to rely on a range of development standards to address scale and intensity. Cities may satisfy section 65302(a) through other accepted development-intensity standards, such as dwelling units per acre, lot-coverage requirements, building-height limits, or other development standards that control the overall size or mass of development.

From BCHD's perspective, this flexibility has particular relevance for the General Plan and public institutional uses, which must remain adaptable to ensure public-serving facilities can continue to meet both current and future community needs. **BCHD recommends that the City of Redondo Beach not include FAR caps in the General Plan for public institutional uses**, where the State statute can be complied with by using more general development standards that regulate scale and intensity. BCHD is wishful, but inaccurate. Achieveable, up-front standards are the clear intention of the State policy. BCHD's wish for unlimited height and square feet is both non-compliant and a dangerous precedent.-

BCHD also notes that public institutions are already accountable to the electorate through elections of governing board members every two years. FAR caps in the General Plan could duplicate existing oversight mechanisms and may limit the ability of future governing bodies to respond to changing community needs. Speaking of elections, BCHD's Measure BC ($30M to prepare the campus for redevelopment and build the 91% non-resident service territory ALLCOVE building) was soundly rejected in November of 2024. It was the ONLY revenue measure rejected. It failed to garner a

simple majority as $600M+ of other bond measures passed by 2/3rds votes. **BCHD DOES NOT HAVE VOTER SUPPORT FOR ITS OVERDEVELOPMENT SCHEME. In fact, voters wouldn't even approved PREPARATION for the BCHD DEVELOPMENT SCHEME.**

If the City Council nonetheless chooses to proceed with a FAR cap for public institutional use, BCHD respectfully requests that it be consistent with the FAR applied to City Hall, the City's other large public institutional property. In the Fall of 2024, the City adopted an addendum to the Environmental Impact Report (EIR) concluding that maintaining the same FAR level (1.25) for these large public institutional properties would result in no significant environmental impacts. In light of that environmental review, applying a lower FAR standard in the General Plan to BCHD would raise concerns regarding internal consistency within the General Plan and give the appearance of targeting a specific property. **The City has no need for increased FAR caps at this time.** All Public land uses **should be capped at the maximum of their existing FAR or 0.5 to 0.75 FAR.**

As the City of Redondo Beach considers these issues, BCHD looks forward to continued collaboration with the City as it plans for the future. Our shared goal is to ensure that public institutions remain able to meet the community's needs both today and in the years ahead.

--
StopBCHD.com (StopBCHD@gmail.com) is a Neighborhood Quality-of-Life Community concerned about the quality-of-life, health, and economic damages that BCHDs 110-foot above the street, 800,000 sqft commercial development will inflict for the next 50-100 years. Our neighborhoods have been burdened since 1960 by the failed South Bay Hospital project and have not received the benefit of the voter-approved acute care public hospital since 1984.Yet we still suffer 100% of the damages and we will suffer 100% of the damages of BCHDs proposal.

From: Gil Escontrias
To: CityClerk; Brad Waller; James Light; Castle Chadwick; Paige Kaluderovic; Zein Obagi; Scott Behrendt
Subject: Public Comment on Agenda Item N1 — FAR Limits and Community Impact
Date: Tuesday, January 20, 2026 9:15:03 AM

You don't often get email from gmescontrias@gmail.com. Learn why this is important

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

Honorable Mayor and Members of the Redondo Beach City Council,

I am writing regarding Agenda Item N1 to express my **OPPOSITION TO OVERDEVELOPMENT and support for limiting the Beach Cities Health District's development to a Floor Area Ratio, or FAR, of no more than 0.5, or at most 0.75 in the General Plan update.**

BCHD's current plans reflect what I believe to be clear overdevelopment, particularly given that the project relies entirely on private developers. This type of supersized development does not fit the scale, character, or capacity of this area and should not be approved under the banner of a public health district.

Infrastructure concerns have not been adequately addressed. Traffic congestion, parking, emergency access, utilities, and overall neighborhood impacts remain unresolved. This site was designed to serve South Bay residents, and further intensification will only increase congestion and strain on streets and services that are already heavily used.

It also appears that BCHD is seeking to expand its reach beyond serving the South Bay, without meaningful public communication or consent from the communities it was created to serve. In my view, this direction is inconsistent with BCHD's stated mission and purpose and raises serious concerns about whether the current proposal exceeds the intent and authority of the District.

For these reasons, I respectfully urge the City Council and Mayor to support strict FAR limits of 0.5, or no more than 0.75, and to oppose large-scale, privately driven development that would permanently change this site and negatively impact surrounding neighborhoods.

Thank you for your time, your consideration, and your service to our community.

Respectfully,
Gil Escontrias

District 1

From:	Stop BCHD
To:	CityClerk; cityclerk@manhattanbeach.gov; cityclerk@hermosabeach.gov; cityclerk@torranceca.gov; info; executiveoffice@bos.lacounty.gov; citycouncil@manhattanbeach.gov; City Council; Kevin Cody
Subject:	Public Comment: BCHD"s EIR Allows for Significant Health and Hearing Damage to Surrounding Residents
Date:	Sunday, January 18, 2026 3:02:09 PM
Attachments:	Consequences_of_traffic_noise_in_residen.pdf

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Cities and Agencies Impacted by BCHD Proposed Commercial Development
Note: Hermosa, Manhattan and Redondo Beach have fiduciary responsibilities to their residents as joint City and Health District taxpayers.

BCHD's EIR vendor is known for its work on industrial clients, such as refineries. In fact, BCHD's EIR vendor was the partner for a refinery located adjacent to a U.S. National Park. As a result, Wood PLC (a UK company) has demonstrated itself as very pro-industrial.

BCHD has elected to override the health damages from noise in its final EIR for the Healthy Living Campus. That is both immoral and ironic.

BCHD's EIR vendor incorrectly allowed no transferability of research on the damages caused by BCHD, such as the attached article on noise damage that will be equivalent to that caused during the 100% private development planned for the BCHD site. It's unclear if this transferability of research was due to BCHD implicit racism bias (the work was done on a brown population outside the US) or simply ignored in order to achieve BCHD's goals at all costs to surrounding property and residents.

In any event, BCHD uses the same transferability of research on all of its existing programs, since it clearly states them to be evidence based ,yet BCHD has repeatedly stated that it doesn't have the skills to evaluate programs.

--
StopBCHD.com (StopBCHD@gmail.com) is a Neighborhood Quality-of-Life Community concerned about the quality-of-life, health, and economic damages that BCHDs 110-foot above the street, 800,000 sqft commercial development will inflict for the next 50-100 years. Our neighborhoods have been burdened since 1960 by the failed South Bay Hospital project and have not received the benefit of the voter-approved acute care public hospital since 1984.Yet we still suffer 100% of the damages and we will suffer 100% of the damages of BCHDs proposal.

From: Charlie Velasquez
To: CityClerk
Cc: Tom Bakaly (he/him/his)
Subject: Public Comment: FAR Agenda Item
Date: Tuesday, January 13, 2026 1:19:18 PM
Attachments: image001.png
BCHD Public Comment - FAR Action Item.pdf

You don't often get email from charlie.velasquez@bchd.org. Learn why this is important

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

Hello,

Please find attached letter from BCHD as a public comment on the FAR Agenda Item for next week's city council meeting.

Best Regards,
Charlie Velasquez
(he/him)
Executive Assistant to the CEO
Beach Cities Health District
Ph: 310 374-3426, x 8213
Fax: 310-376-4738
www.bchd.org
www.facebook.com/beachcitieshealth

Creating a healthy beach community.
THE PRECEDING E-MAIL, INCLUDING ANY ATTACHMENTS, CONTAINS INFORMATION THAT MAY BE CONFIDENTIAL, BE PROTECTED BY ATTORNEY CLIENT OR OTHER APPLICABLE PRIVILEGES, OR CONSTITUTE NON-PUBLIC INFORMATION. IT IS INTENDED TO BE CONVEYED ONLY TO THE DESIGNATED RECIPIENT. IF YOU ARE NOT THE INTENDED RECIPIENT OF THIS MESSAGE, PLEASE NOTIFY THE SENDER BY REPLYING TO THIS MESSAGE AND THEN DELETE IT FROM YOUR SYSTEM. USE, DISSEMINATION, DISTRIBUTION, OR REPRODUCTION OF THIS MESSAGE BY UNINTENDED RECIPIENTS IS NOT AUTHORIZED AND MAY BE UNLAWFUL.
PLEASE NOTE THAT CORRESPONDENCE WITH THE BEACH CITIES HEALTH DISTRICT, ALONG WITH ALL ATTACHMENTS OR OTHER ITEMS, MAY BE SUBJECT TO DISCLOSURE IN ACCORDANCE WITH THE CALIFORNIA PUBLIC RECORDS ACT. THE BEACH CITIES HEALTH DISTRICT SHALL NOT BE RESPONSIBLE FOR ANY CLAIMS, LOSSES OR DAMAGES RESULTING FROM THE DISCLOSURE OR USE OF ANY INFORMATION, DATA OR OTHER ITEMS THAT MAY BE CONTAINED IN ANY CORRESPONDENCE.

BCHD Beach Cities Health District
A Public Agency

Live Well. Health Matters.

January 7, 2026

Mayor and City Council:

Like the City of Redondo Beach, Beach Cities Health District's (BCHD) mission is focused on serving the long-term and evolving needs of the community. Public institutions like the City and BCHD have remained responsive to changing demographics, service delivery models and community priorities, and BCHD values planning frameworks that support this adaptability while remaining compatible with the community.

As the City Council continues its deliberations on the General Plan update, I'd like to share the following perspective as part of the broader discussion on public institutional uses and Floor Area Ratio (FAR) caps. As you know, state law calls for general plans to address land use for public buildings and grounds and to include standards related to population density and building intensity across all land use categories (California Government Code § 65302(a)).

While state law requires general plans to include standards addressing building intensity, **it does not require a FAR to meet this obligation**. FAR is one commonly used measure, but California Code § 65302(a) provides flexibility for cities to rely on a range of development standards to address scale and intensity. Cities may satisfy section 65302(a) through other accepted development-intensity standards, such as dwelling units per acre, lot-coverage requirements, building-height limits, or other development standards that control the overall size or mass of development.

From BCHD's perspective, this flexibility has particular relevance for the General Plan and public institutional uses, which must remain adaptable to ensure public-serving facilities can continue to meet both current and future community needs. **BCHD recommends that the City of Redondo Beach not include FAR caps in the General Plan for public institutional uses**, where the State statute can be complied with by using more general development standards that regulate scale and intensity.

BCHD also notes that public institutions are already accountable to the electorate through elections of governing board members every two years. FAR caps in the General Plan could duplicate existing oversight mechanisms and may limit the ability of future governing bodies to respond to changing community needs.

If the City Council nonetheless chooses to proceed with a FAR cap for public institutional use, BCHD respectfully requests that it be consistent with the FAR applied to City Hall, the City's other large public institutional property. In the Fall of 2024, the City adopted an addendum to the Environmental Impact Report (EIR) concluding that maintaining the same FAR level (1.25) for these large public institutional properties would result in no significant environmental impacts. In light of that environmental review, applying a lower FAR standard in the General Plan to BCHD would raise concerns regarding internal consistency within the General Plan and give the appearance of targeting a specific property.

1200 Del Amo Street, Redondo Beach, CA 90277
Phone: (310) 374-3426 • Fax: (310) 376-4738 • www.bchd.org

As the City of Redondo Beach considers these issues, BCHD looks forward to continued collaboration with the City as it plans for the future. Our shared goal is to ensure that public institutions remain able to meet the community's needs both today and in the years ahead.

In Health,

Tom Bakaly
Chief Executive Officer
Beach Cities Health District

From:	gtafremow@verizon.net
To:	Joy Ford; CityClerk; cityclerk@manhattanbeach.gov; cityclerk@hermosabeach.gov; James Light; Paige Kaluderovic; Mike Witzansky; Scott Behrendt; Chadwick B. Castle; Brad Waller
Subject:	Public Comment: Redline of BCHD Incorrect Statements in Bakaly Letter to RB City Council
Date:	Tuesday, January 20, 2026 11:40:48 AM
Attachments:	image001.png image002.png

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We SUPPORT passage of Agenda Item N1 - BCHD to a 0.5 or 0.75 FAR ONLY. BCHD's planned OVERDEVELOPMENT with 100% Private Developers should not be SUPERSIZED. Passage is required because BCHD cannot be trusted to self-limit its 100% PRIVATE DEVELOPERS.

BCHD has a history of lying to the public.

At the October 1, 2024 RB Council Meeting, BCHD Board Member Poster made the ABSOLUTELY FALSE STATEMENT TO THE COUNCIL "your own lawyers had to remind them during a public meeting and on the record to stop targeting BCHD in their remarks." RB Planning Commissioners came to the Council and demonstrated with TRANSCRIPTS that Poster lied to the City Council.

In a July 2025 ER News interview, CEO Bakaly claimed that the 4-story hospital was 60-feet tall. The Board has previously CERTIFIED to the STATE that the 4-story hospital is only 51.5-feet tall at the top of its parapet (the wall around the roof of the building) so that actual roof is under 50-feet, NOT 60-FEET.

Untruthful statements are made to the Council and the Public from the HIGHEST LEVELS OF BCHD. In fact, BCHD letter to the Council contains a variety of misleading statements as demonstrated below.

DO NOT ALLOW BCHD TO DESTROY OUR NEIGHBORHOODS WITH SUPERSIZED PRIVATE DEVELOPMENT TO SERVICE 80% OR MORE NON-RESIDENTS WHILE DAMAGES ARE ALL LOCAL!

REDLINE OF BCHD'S CLAIMS TO THE CITY OF REDONDO BEACH

Mayor and City Council:

Like the City of Redondo Beach, Beach Cities Health District's (BCHD) mission is focused on serving the long-term and evolving needs of the community. Unlike the City, BCHD extends its services via ALLCOVE to a service area of 1.4M population. Likewise, only TWO (2) BCHD Programs require residency. All other are open to all comers, inside or outside the District. Public institutions like the City and BCHD have remained responsive to changing demographics, service delivery models and community priorities, and BCHD values planning frameworks that support this adaptability while remaining compatible with the community.

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BCHD also notes that public institutions are already accountable to the electorate through elections of governing board members every two years. FAR caps in the General Plan could duplicate existing oversight mechanisms and may limit the ability of future governing bodies to respond to changing community needs. Speaking of elections, BCHD's Measure BC ($30M to prepare the campus for redevelopment and build the 91% non-resident service territory ALLCOVE building) was soundly rejected in November of 2024. It was the ONLY revenue measure rejected. It failed to garner a

simple majority as $600M+ of other bond measures passed by 2/3rds votes. **BCHD DOES NOT HAVE VOTER SUPPORT FOR ITS OVERDEVELOPMENT SCHEME. In fact, voters wouldn't even approved PREPARATION for the BCHD DEVELOPMENT SCHEME.**

If the City Council nonetheless chooses to proceed with a FAR cap for public institutional use, BCHD respectfully requests that it be consistent with the FAR applied to City Hall, the City's other large public institutional property. In the Fall of 2024, the City adopted an addendum to the Environmental Impact Report (EIR) concluding that maintaining the same FAR level (1.25) for these large public institutional properties would result in no significant environmental impacts. In light of that environmental review, applying a lower FAR standard in the General Plan to BCHD would raise concerns regarding internal consistency within the General Plan and give the appearance of targeting a specific property. **The City has no need for increased FAR caps at this time.** All Public land uses **should be capped at the maximum of their existing FAR or 0.5 to 0.75 FAR.**

As the City of Redondo Beach considers these issues, BCHD looks forward to continued collaboration with the City as it plans for the future. Our shared goal is to ensure that public institutions remain able to meet the community's needs both today and in the years ahead.

Best regards,
Long Time Residentse

From:	p Yee
To:	CityClerk; cityclerk@manhattanbeach.gov; cityclerk@hermosabeach.gov; James Light; Paige Kaluderovic; Mike Witzansky; Scott Behrendt; Chadwick B. Castle; Brad Waller; Joy Ford
Subject:	Public Comment: Redline of BCHD Incorrect Statements in Bakaly Letter to RB City Council
Date:	Monday, January 19, 2026 7:14:13 PM
Attachments:	BCHD Claims Redline v1.pdf image.png image.png

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Send to: <

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From:	Stop BCHD
To:	CityClerk; cityclerk@manhattanbeach.gov; cityclerk@hermosabeach.gov; cityclerk@torranceca.gov; City Council; citycouncil@manhattanbeach.gov; Paige Kaluderovic; James Light; joyce field; Mike Witzansky; Kevin Cody; Residents Against Overdevelopment
Subject:	Public Comment: Voters REJECTED BCHD"s Plan for CAMPUS EXPANSION - No funding for ALLCOVE and Demolition of the Hospital
Date:	Sunday, January 18, 2026 5:20:49 PM
Attachments:	image.png

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Measure BC failed. It was the ONLY revenue bond measure in the Beach Cities that FAILED.

$600M in bonds passed, but BCHD's Measure BC didn't even get a simple majority, though two-thirds was needed.

IN SHORT - VOTERS REJECTED BCHD'S PLANS.

Any claim by BCHD, its CEO, its Board or its $2.5M per year in executives that VOTERS WANT A SUPERSIZED DEVELOPMENT MUST BE REJECTED.

BCHD is either delusional or outright lying.

Voters approved over $600M in bonds and REJECTED BCHD's $30M bond issuance to finish the 91% non-resident service area ALLCOVE building and demolition to clear the way for a 100% PRIVATE DEVELOPMENT.

November 2024 Election: Beach Cities Bond Measures					
Measure	**Description**	**Amount**	**Result**	**Voter Percent (Yes)**	**Required**
Measure BC (BCHD)	**Health & Wellness Campus: youth mental health center and open space.**	**$30 Million**	**Fail**	**~46.76%**	**2/3rds**
Measure RLS (Manhattan Beach USD)	School improvements: repairs to roofs, plumbing, and safety upgrades.	$200 Million	**Pass**	~67.0%	2/3rds
Measure S (Redondo Beach USD)	School facility repairs: replacing leaky roofs and outdated HVAC systems.	$278 Million	**Pass**	~66.18%	2/3rds
Measure HV (Hermosa Beach CSD)	School modernization: updating classrooms and safety systems.	$28.7 Million	**Pass**	~60.26%	2/3rds
Measure FP (Redondo Beach City)	Public safety: upgrading fire operations and facilities.	$93.35 Million	**Pass**	~71.15%	2/3rds

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StopBCHD.com (StopBCHD@gmail.com) is a Neighborhood Quality-of-Life Community concerned about the quality-of-life, health, and economic damages that BCHDs 110-foot above the street, 800,000 sqft commercial development will inflict for the next 50-100 years. Our neighborhoods have been burdened since 1960 by the failed South Bay Hospital project and have not received the benefit of the voter-approved acute care public hospital since 1984.Yet we still suffer 100% of the damages and we will suffer 100% of the damages of BCHDs proposal.

From:	Stephanie Ishioka
To:	CityClerk; James Light; Brad Waller; Chadwick B. Castle; Paige Kaluderovic; Zein Obagi; Scott Behrendt; Marc Wiener; Sean Scully
Subject:	Public Comments for N1 - Oppose increase in FAR for BCHD
Date:	Tuesday, January 20, 2026 10:45:46 AM

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I SUPPORT a 0.5 to 0.75 FAR cap for BCHD and oppose any increase in FAR for BCHD. Any increase for BCHD would be excessive for their non-emergency services and out of scale with the character of the City and surrounding areas.

Thank you.
-Stephanie Ishioka

From:	Jeff Earnest
To:	CityClerk; James Light; Brad Waller; Chadwick B. Castle; Paige Kaluderovic; Zein Obagi; Scott Behrendt; Marc Wiener; Sean Scully
Cc:	Jeff Earnest
Subject:	Public Comments for N1 - Oppose increase in FAR for BCHD
Date:	Monday, January 19, 2026 8:23:43 PM

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To Whom It May Concern,

I am writing to express my opposition to any increase in the Floor Area Ratio (FAR) for the Beach Cities Health District (BCHD).

I believe any such increase would be excessive for the non-emergency services provided and would be out of scale with the character of the city and its surrounding neighborhoods.

Best regards,
JDE - RB resident

From:	Skye
To:	CityClerk; James Light; Brad Waller; Chadwick B. Castle; Paige Kaluderovic; Zein Obagi; Scott Behrendt; Marc Wiener; Sean Scully
Subject:	Public Comments for N1 - Oppose increase in FAR for BCHD
Date:	Monday, January 19, 2026 9:00:40 AM

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All,

I oppose any increase in FAR for BCHD. Any increase would be excessive for their non-emergency services and out of scale with the character of the City and the surrounding areas.

Thank you for your consideration.

Skye

From: Hamant and Robin Patel
To: CityClerk
Subject: Public Comments for N1 - Oppose increase in FAR for BCHD
Date: Monday, January 19, 2026 7:03:14 AM

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

I oppose any increase in FAR for BCHD. Any increase would be excessive for their non-emergency services and out of scale with the character of the City and surrounding areas.

Robin Patel

From:	JOHN STAUFFER
To:	CityClerk; James Light; Brad Waller; Chadwick B. Castle; Paige Kaluderovic; Zein Obagi; Scott Behrendt; Marc Wiener; Sean Scully
Subject:	Public Comments for N1 - Oppose increase in FAR for BCHD
Date:	Monday, January 19, 2026 5:38:16 AM

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

WE oppose any increase in FAR for BCHD. Any increase would be excessive for their non-emergency services and out of scale with the character of the City and surrounding areas.

Joyce and John Stauffer
19411 Linda Drive
Torrance, CA 90503

From: Lisa Kirkwood
To: CityClerk
Subject: Public Comments for N1 - Oppose increase in FAR for BCHD
Date: Monday, January 19, 2026 10:26:05 AM

You don't often get email from lisa.j.kirkwood@gmail.com. Learn why this is important

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

I oppose any increase in FAR for BCHD. Any increase would be excessive for their non-emergency services and out of scale with the character of the City and surrounding areas.

Thank you,
Lisa Kirkwood
Sent from my iPhone

From: Laura Zahn
To: CityClerk
Cc: James Light
Subject: Public Comments for N1- I OPPOSE increase for BCHD
Date: Monday, January 19, 2026 5:21:51 PM

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

I oppose the proposed increase of 1.25 far for BCHD's Private Development scheme on Public Land. None of BCHD's "Services" are Essential, just like… none of BCHD's "Services" are ORIGINAL… BCHD Borrows existing established programs from other organizations, puts a new Spin on it and then tries to Capitalize on it for THEIR own Financial gain and glory. In the Animal Kingdom BCHD's actions would be called Predatory, in the Plant Kingdom BCHD's actions would be called Parasitic, in the music/ publishing/acting world BCHD's actions would be called Plagiarism.

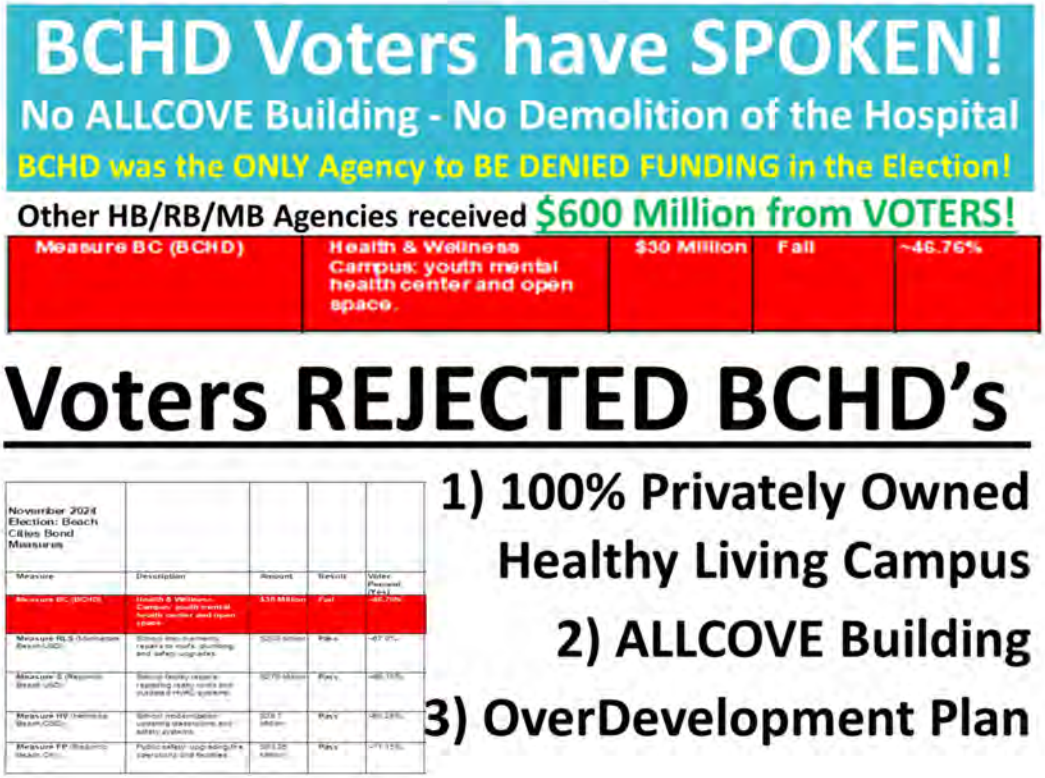
BCHD has for decades caused SO much turmoil, divisions, and strife for the Residents of Redondo specifically (because of their relentless pursuit of controlling the development of the Public Land in question) In addition to wasting millions of taxpayers dollars EVERY year with yet another "Development Scheme" or BCHD trying to woo another "partner " who is a legitimate established and funded organization in an effort to LOOK-GOOD so as to capture some of that organization's funding. Enough is enough as I have said numerous times over the years. Can you please just dissolve your Board… and leave the citizens of Redondo Beach, Hermosa Beach, and Manhattan Beach alone.

Laura Zahn

Sent from my iPhone

From:	Mark Nelson (Home Gmail)
To:	Joy Ford; CityClerk; cityclerk@manhattanbeach.gov; cityclerk@hermosabeach.gov; James Light; Paige Kaluderovic; Mike Witzansky; Scott Behrendt; Chadwick B. Castle; Brad Waller
Subject:	Re: I SUPPORT passage of Agenda Item N1 - BCHD to a 0.5 or 0.75 FAR ONLY. BCHD's planned OVERDEVELOPMENT with 100% Private Developers should not be SUPERSIZED. Passage is required because BCHD cannot be trusted to self-limit its 100% PRIVATE DEVELOPERS.
Date:	Monday, January 19, 2026 6:06:02 PM
Attachments:	image.png

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



On Mon, Jan 19, 2026 at 5:10 PM Mark Nelson (Home Gmail) <menelson@gmail.com> wrote:

> **I SUPPORT passage of Agenda Item N1 - BCHD to a 0.5 or 0.75 FAR ONLY. BCHD's planned OVERDEVELOPMENT with 100% Private Developers should not be SUPERSIZED. Passage is required because BCHD cannot be trusted to self-limit its 100% PRIVATE DEVELOPERS.**
>
> BCHD has a history of lying to the public.
>
> At the October 1, 2024 RB Council Meeting, BCHD Board Member Poster made the ABSOLUTELY FALSE STATEMENT TO THE COUNCIL "your own lawyers had to remind them during a public meeting and on the record to stop targeting BCHD in their remarks." RB Planning Commissioners came to the Council and demonstrated with

TRANSCRIPTS that Poster lied to the City Council.

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Untruthful statements are made to the Council and the Public from the HIGHEST LEVELS OF BCHD. In fact, BCHD letter to the Council contains a variety of misleading statements as demonstrated below.

DO NOT ALLOW BCHD TO DESTROY OUR NEIGHBORHOODS WITH SUPERSIZED PRIVATE DEVELOPMENT TO SERVICE 80% OR MORE NON-RESIDENTS WHILE DAMAGES ARE ALL LOCAL!

REDLINE OF BCHD'S FALSE CLAIMS TO THE CITY OF REDONDO BEACH



From:	Mark Nelson (Home Gmail)
To:	Joy Ford; CityClerk; cityclerk@manhattanbeach.gov; cityclerk@hermosabeach.gov; James Light; Paige Kaluderovic; Mike Witzansky; Scott Behrendt; Chadwick B. Castle; Brad Waller
Subject:	Re: I SUPPORT passage of Agenda Item N1 - BCHD to a 0.5 or 0.75 FAR ONLY. BCHD's planned OVERDEVELOPMENT with 100% Private Developers should not be SUPERSIZED. Passage is required because BCHD cannot be trusted to self-limit its 100% PRIVATE DEVELOPERS.
Date:	Monday, January 19, 2026 6:11:25 PM
Attachments:	image.png image.png image.png

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BCHD repeatedly lies to the Council and the Public. These redlines help correct BCHD's generally skewed record.

REDLINE OF BCHD'S CLAIMS TO THE CITY OF REDONDO BEACH

Mayor and City Council:

Like the City of Redondo Beach, Beach Cities Health District's (BCHD) mission is focused on serving the long-term and evolving needs of the community. Unlike the City, BCHD extends its services via ALLCOVE to a service area of 1.4M population. Likewise, only TWO (2) BCHD Programs require residency. All other are open to all comers, inside or outside the District. Public institutions like the City and BCHD have remained responsive to changing demographics, service delivery models and community priorities, and BCHD values planning frameworks that support this adaptability while remaining compatible with the community.

As the City Council continues its deliberations on the General Plan update, I'd like to share the following perspective as part of the broader discussion on public institutional uses and Floor Area Ratio (FAR) caps. As you know, state law calls for general plans to address land use for public buildings and grounds and to include standards related to population density and building intensity across all land use categories (California Government Code § 65302(a)).

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From BCHD's perspective, this flexibility has particular relevance for the General Plan and public institutional uses, which must remain adaptable to ensure public-serving facilities can continue to meet both current and future community needs. **BCHD recommends that the City of Redondo Beach not include FAR caps in the General Plan for public institutional uses**, where the State statute can be complied with by using more general development standards that regulate scale and intensity. BCHD is wishful, but inaccurate. Achieveable, up-front standards are the clear intention of the State policy. BCHD's wish for unlimited height and square feet is both non-compliant and a dangerous precedent.-

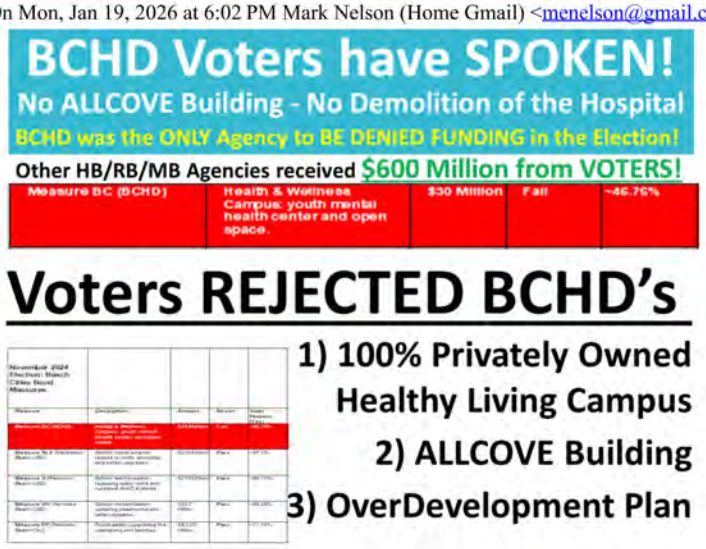
BCHD also notes that public institutions are already accountable to the electorate through elections of governing board members every two years. FAR caps in the General Plan could duplicate existing oversight mechanisms and may limit the ability of future governing bodies to respond to changing community needs. Speaking of elections, BCHD's Measure BC ($30M to prepare the campus for redevelopment and build the 91% non-resident service territory ALLCOVE building) was soundly rejected in November of 2024. It was the ONLY revenue measure rejected. It failed to garner a

simple majority as $600M+ of other bond measures passed by 2/3rds votes. **BCHD DOES NOT HAVE VOTER SUPPORT FOR ITS OVERDEVELOPMENT SCHEME. In fact, voters wouldn't even approved PREPARATION for the BCHD DEVELOPMENT SCHEME.**

If the City Council nonetheless chooses to proceed with a FAR cap for public institutional use, BCHD respectfully requests that it be consistent with the FAR applied to City Hall, the City's other large public institutional property. In the Fall of 2024, the City adopted an addendum to the Environmental Impact Report (EIR) concluding that maintaining the same FAR level (1.25) for these large public institutional properties would result in no significant environmental impacts. In light of that environmental review, applying a lower FAR standard in the General Plan to BCHD would raise concerns regarding internal consistency within the General Plan and give the appearance of targeting a specific property. **The City has no need for increased FAR caps at this time.** All Public land uses **should be capped at the maximum of their existing FAR or 0.5 to 0.75 FAR.**

As the City of Redondo Beach considers these issues, BCHD looks forward to continued collaboration with the City as it plans for the future. Our shared goal is to ensure that public institutions remain able to meet the community's needs both today and in the years ahead.

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I SUPPORT passage of Agenda Item N1 - BCHD to a 0.5 or 0.75 FAR ONLY. BCHD's planned OVERDEVELOPMENT with 100% Private Developers should not be SUPERSIZED. Passage is required because BCHD cannot be trusted to self-limit its 100% PRIVATE DEVELOPERS.

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At the October 1, 2024 RB Council Meeting, BCHD Board Member Poster made the ABSOLUTELY FALSE STATEMENT TO THE COUNCIL "your own lawyers had to remind them during a public meeting and on the record to stop targeting BCHD in their remarks." RB Planning Commissioners came to the Council and demonstrated with TRANSCRIPTS that Poster lied to the City Council.

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REDLINE OF BCHD'S FALSE CLAIMS TO THE CITY OF REDONDO BEACH



From: Dency Nelson
To: CityClerk
Cc: James Light; Brad Waller; castle@redondo.org; Paige Kaluderovic; Zein Obagi; Scott Behrendt
Subject: Regarding Agenda Item N1 - OPPOSE Limiting Only BCHD to a 0.75 FAR
Date: Monday, January 19, 2026 2:28:56 PM

You don't often get email from dln52hb@gmail.com. Learn why this is important

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I OPPOSE limiting only BCHD to a 0.75 FAR while allowing higher FARs for other public institutional uses such as City Hall. I SUPPORT a uniform 1.25 FAE for BCHD, City Hall and the Annex. BCHD is as valuable a "Third Place" for citizens to come to for healthy bodies, healthy minds and healthy spirits and should be provided the space equal to the other public locations that offer benefits to the community.

Thank you for your attention to this matter!

Dency Nelson
DLN52HB@gmail.com
310-710-3189

From: D. Dangelo
To: CityClerk
Subject: Subject: "Regarding Agenda Item N1, I SUPPORT limiting BCHD to a 0.5 or 0.75 FAR ONLY. BCHD's planned OVERDEVELOPMENT with 100% Private Developers should not be SUPERSIZED."
Date: Monday, January 19, 2026 2:06:38 PM

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Dear City Clerk's office and Redondo Beach City Council,

BCHD cannot be trusted to preserve neighborhood safety, character or value. BCHD must have a Floor Area Ratio cap of 0.5 (preferred) or 0.75 (maximum). The only reason that BCHD is requesting authority to DOUBLE the size of the campus must be due to a hidden plan. BCHD's doubling of the campus would lead to catastrophic negative impacts on the surrounding thousands of residents' health and welfare with traffic, noise, pollution and other negative impacts.

I am a twenty-five year educator with RBUSD, AND even more importantly, a sixty-five year resident of Redondo Beach. So I live and work in Redondo Beach!
Listen to your constituents!

Regards,

Denise Dangelo

From:	Mark Nelson (Home Gmail)
To:	CityClerk; Zein Obagi; Scott Behrendt; Paige Kaluderovic; Brad Waller; Chadwick B. Castle; Joy Ford
Subject:	SUPPORT Item N1 - limiting BCHD to a 0.5 or 0.75 FAR ONLY. BCHD's planned OVERDEVELOPMENT with 100% Private Developers should not be SUPERSIZED
Date:	Sunday, January 18, 2026 4:38:22 PM

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

I SUPPORT ITEM N1 - the limiting of all Public land use to 0.75 or 0.5 with NO INCREASE to 1.25. The City has no use for the 1.25 FAR for the bond issue. There is no need for an unnecessary loophole that creates EXCESSIVE DEVELOPMENT

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From: Gordon Davis
To: CityClerk; Zein Obagi; Scott Behrendt; Paige Kaluderovic; Brad Waller; Chadwick B. Castle; Joy Ford
Subject: Support Item N1, limiting BCHD to a 0.5 or 0.75 FAR ONLY
Date: Tuesday, January 20, 2026 7:27:24 AM

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SUPPORT N1 AS THE PLANNING COMMISSION AUTHORED IT." NO EXPANSION OF THE HEIGHT OR SQFT OF BCHD!
Gordon and Suelynne Davis

And time, A maniac scattering dust
And life, A fury slinging flame

From:	Marcia Gehrt
To:	Joy Ford; CityClerk; cityclerk@manhattanbeach.gov; cityclerk@hermosabeach.gov; James Light; Paige Kaluderovic; Mike Witzansky; Scott Behrendt; Chadwick B. Castle; Brad Waller
Subject:	Support passage of Agenda Item N1
Date:	Tuesday, January 20, 2026 10:05:07 AM

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

I SUPPORT passage of Agenda Item N1 - BCHD to a 0.5 or 0.75 FAR ONLY. BCHD's planned OVERDEVELOPMENT with 100% Private Developers should not be SUPERSIZED. Passage is required because BCHD cannot be trusted to self-limit its 100% PRIVATE DEVELOPERS.

Please honor the existing CAP limit on the FAR. Do not bend to the administration of BCHD for the sake of the future of the City.

Thank you,

Marcia Gehrt

From:	LINDA Zelik
To:	Joy Ford; CityClerk; cityclerk@manhattanbeach.gov; cityclerk@hermosabeach.gov; James Light; Paige Kaluderovic; Mike Witzansky; Scott Behrendt; Chadwick B. Castle; Brad Waller
Subject:	Re : Item #N1 - Support of keeping existing FAR limits of .5 to .75
Date:	Tuesday, January 20, 2026 1:24:29 PM
Attachments:	image.png image.png BCHD Claims Redline v1.pdf

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Dear Sirs and Madams;
I support passage of Agenda item #N1 to limit the overdevelopment of public land to a FAR of 0,5 to 0.75
To give this land to private developers so Tom Bakley and his cohorts can realize a huge profit is unethical and against the intended use of the land!
The citizens overwhelmingly object to the commercial development of the land as witnessed by the recent failure of Bond Measure BC to pass.
We, as private citizens living in the surrounding areas, realize what a disaster this would be for the homes, schools and traffic congestion.
Please do not allow these board members to coerce you into destroying our beloved Beach Cities as a place to live, work and provide a safe environment for our school children.

Respectfully, Linda Zelik

Begin forwarded message:

From: Stop BCHD <stop.bchd@gmail.com>
Subject: (FORWARD THIS EMAIL TO THE COUNCIL) Public Comment: Redline of BCHD Incorrect Statements in Bakaly Letter to RB City Council
Date: January 19, 2026 at 7:00:00 PM PST
To: Stop BCHD <stop.bchd@gmail.com>

Send to: <joy.ford@redondo.org>, <cityclerk@redondo.org>, <cityclerk@manhattanbeach.gov>, <cityclerk@hermosabeach.gov>, James Light <james.light@redondo.org>, Paige Kaluderovic <paige.kaluderovic@redondo.org>, <Mike.Witzansky@redondo.org>, <scott.behrendt@redondo.org>, <chadwick.castle@redondo.org>, <brad.waller@redondo.org>

I SUPPORT passage of Agenda Item N1 - BCHD to a 0.5 or 0.75 FAR ONLY. BCHD's planned OVERDEVELOPMENT with 100% Private Developers should not be SUPERSIZED. Passage is required because BCHD cannot be trusted to self-limit its 100% PRIVATE DEVELOPERS.

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As the City of Redondo Beach considers these issues, BCHD looks forward to continued collaboration with the City as it plans for the future. Our shared goal is to ensure that public institutions remain able to meet the community's needs both today and in the years ahead.

--

StopBCHD.com (StopBCHD@gmail.com) is a Neighborhood Quality-of-Life Community concerned about the quality-of-life, health, and economic damages that BCHDs 110-foot above the street, 800,000 sqft commercial development will inflict for the next 50-100 years. Our neighborhoods have been burdened since 1960 by the failed South Bay Hospital project and have not received the benefit of the voter-approved acute care public hospital since 1984.Yet we still suffer 100% of the damages and we will suffer 100% of the damages of BCHDs proposal.

REDLINE OF BCHD'S CLAIMS TO THE CITY OF REDONDO BEACH

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From: ree
To: CityClerk
Subject: Support the lowest FAR possible for the land occupied by bchd
Date: Tuesday, January 20, 2026 1:29:33 PM

You don't often get email from msesi@aol.com. Learn why this is important

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

Dear Public Leaders of the City of RB,

I strongly support a FAR of less than or equal to 0.75.

BCHD wants a higher FAR in order to make the parcel more attractive to a private developer.

If a private developer takes the long term land lease, the public has no right to use it. That was not intended in the beginning, and should not take place.

Please do not raise the FAR.

Sincerely,
Maher Sesi
Redondo Beach

From:	Mary Drummer
To:	James Light; Brad Waller; Chadwick B. Castle; Paige Kaluderovic; Zein Obagi; Scott Behrendt; CityClerk
Subject:	I oppose Agenda Item N1
Date:	Tuesday, January 20, 2026 2:31:52 PM

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Agenda Item N1: I oppose a restriction of a FAR for BCHD and support a uniform 1.25 FAR for BCHD, City Hall, the Annex, and all other agencies that support the Citizens of Redondo Beach. Citing catastrophic repercussions in the neighborhood and surrounding areas is fear mongering, inaccurate and misleading.

Thank you for considering my response.

Mary Drummer
District 1, Redondo Beach

From:	Emily Bodkin
To:	Khatirah Nazif
Cc:	Eleanor Manzano; Laura Diaz
Subject:	Public Comment on Comcate Case #52407 for 1/20/26 CC
Date:	Tuesday, January 20, 2026 2:31:11 PM
Attachments:	image001.png

Hi Khatirah,

Please see the below Public Comment submitted on Comcate Case #52407 at 1:32 PM:

Regarding Agenda Item N1, I OPPOSE limiting only BCHD to a 0.75 FAR while allowing higher FARs for other public institutional uses such as City Hall. I SUPPORT a uniform 1.25 FAR for BCHD, City Hall and the Annex. BCHD is only asking for logical, reasonable and uniform requirements for ALL public institutions. This is necessary for BCHD to continue to support our South Bay residents in the future.

Respectfully submitted.

Heck, Dennis

Please let me know if additional information is needed.

Thank you,

Emily Bodkin

Administrative Specialist | City Clerk's Office

310.697.3176

Emily.Bodkin@redondo.org

REDONDO BEACH

From: mjteola@aol.com
To: CityClerk
Subject: Public Comments for N1 - Oppose increase in FAR for BCHD
Date: Tuesday, January 20, 2026 2:37:21 PM

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I SUPPORT a 0.5 to 0.75 FAR cap for BCHD and oppose any increase in FAR for BCHD. Any increase for BCHD would be excessive for their non-emergency services and out of scale with the character of the City and surrounding areas.

How many more times will this issue be addressed. The Planning Commission gave a recommendation. Follow it!

From:	ajsams@verizon.net
To:	CityClerk; James Light; Brad Waller; Chadwick B. Castle; Paige Kaluderovic; Zein Obagi; Scott Behrendt; Marc Wiener; Sean Scully
Subject:	Public Comments for N1 - Oppose increase in FAR for BCHD
Date:	Tuesday, January 20, 2026 2:40:02 PM

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I oppose any increase in FAR for BCHD. Any increase would be excessive for their non-emergency services and out of scale with the character of the City and surrounding areas. It is only going to hurt the homeowners in the surrounding areas. The land and area there was not created for overbuilding. Put this in your own backyard.

Jennifer Sams

From:	waynecraighomes@gmail.com
To:	Eleanor Manzano; CityClerk
Cc:	James Light; Brad Waller; Chadwick B. Castle; Paige Kaluderovic; Scott Behrendt; Zein Obagi
Subject:	Blue Folder Supplemental Information - For City Council Agenda Item N1 1/20/25
Date:	Tuesday, January 20, 2026 2:55:08 PM
Attachments:	School Zone Property Up Zoned.pdf

You don't often get email from waynecraighomes@gmail.com. Learn why this is important

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

Mayor and City Council,

Item N1 has the potential to change the zoning of school property that could in the future be deemed as surplus property.

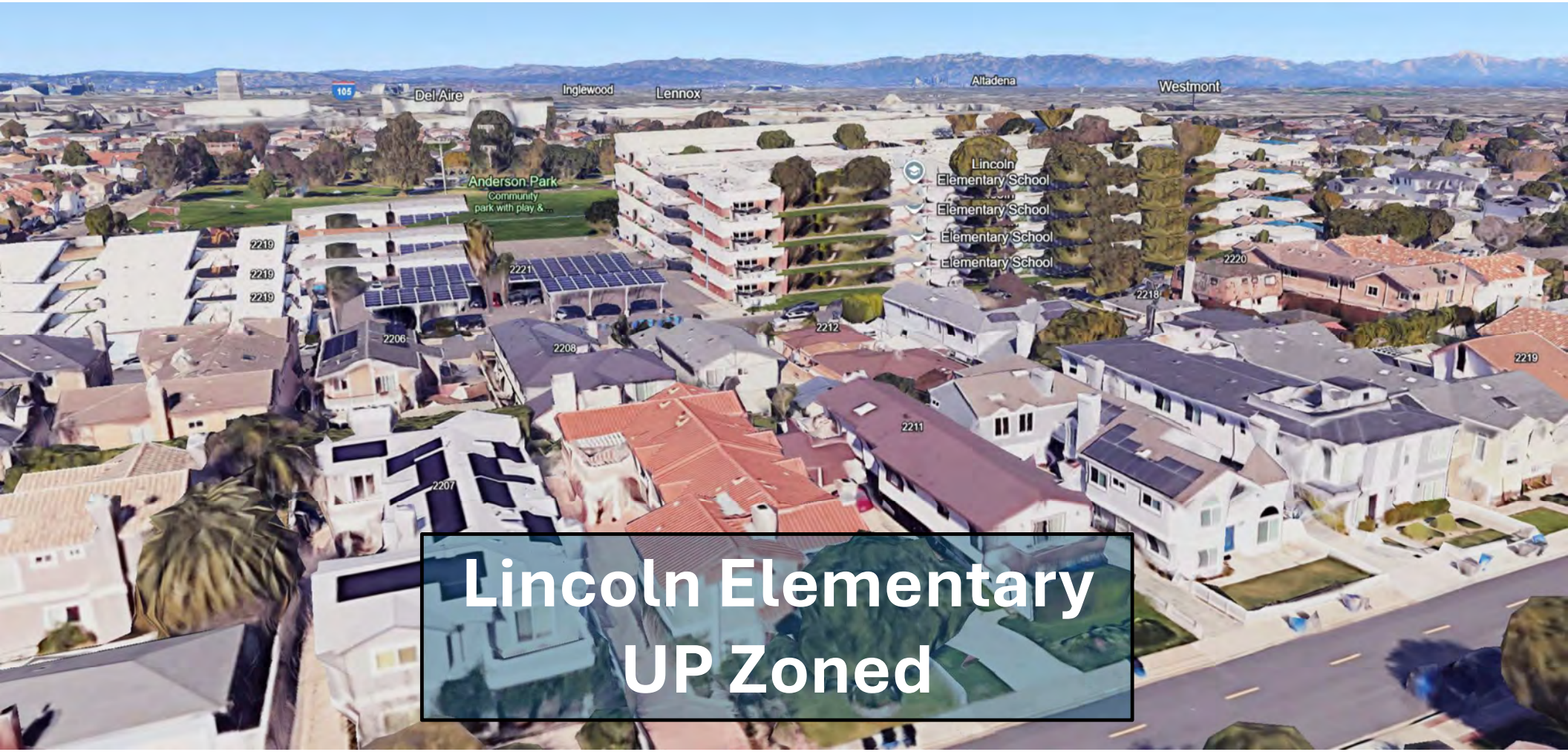
Attached is a rough representation of what that could look like with current housing bills coming out of Sacramento.

Sincerely,

Wayne Craig
Redondo Beach



Lincoln Elementary


105
Del Aire
Inglewood
Lennox
Altadena
Westmont
Anderson Park
Community
park with play &...
Lincoln
Elementary School
Elementary School
Elementary School
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Lincoln Elementary
UP Zoned



Jefferson Elementary



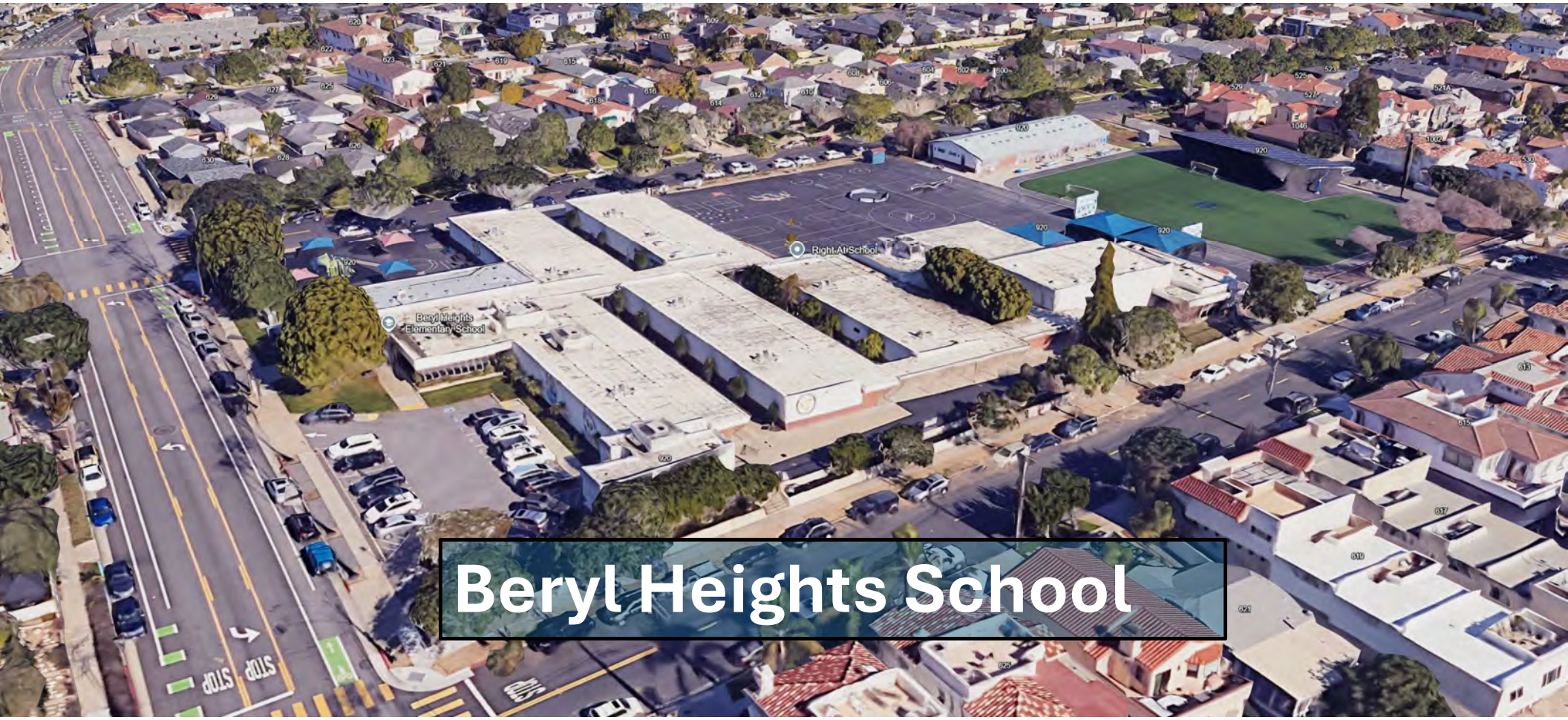
Jefferson Elementary
UP Zoned



Alta Vista School



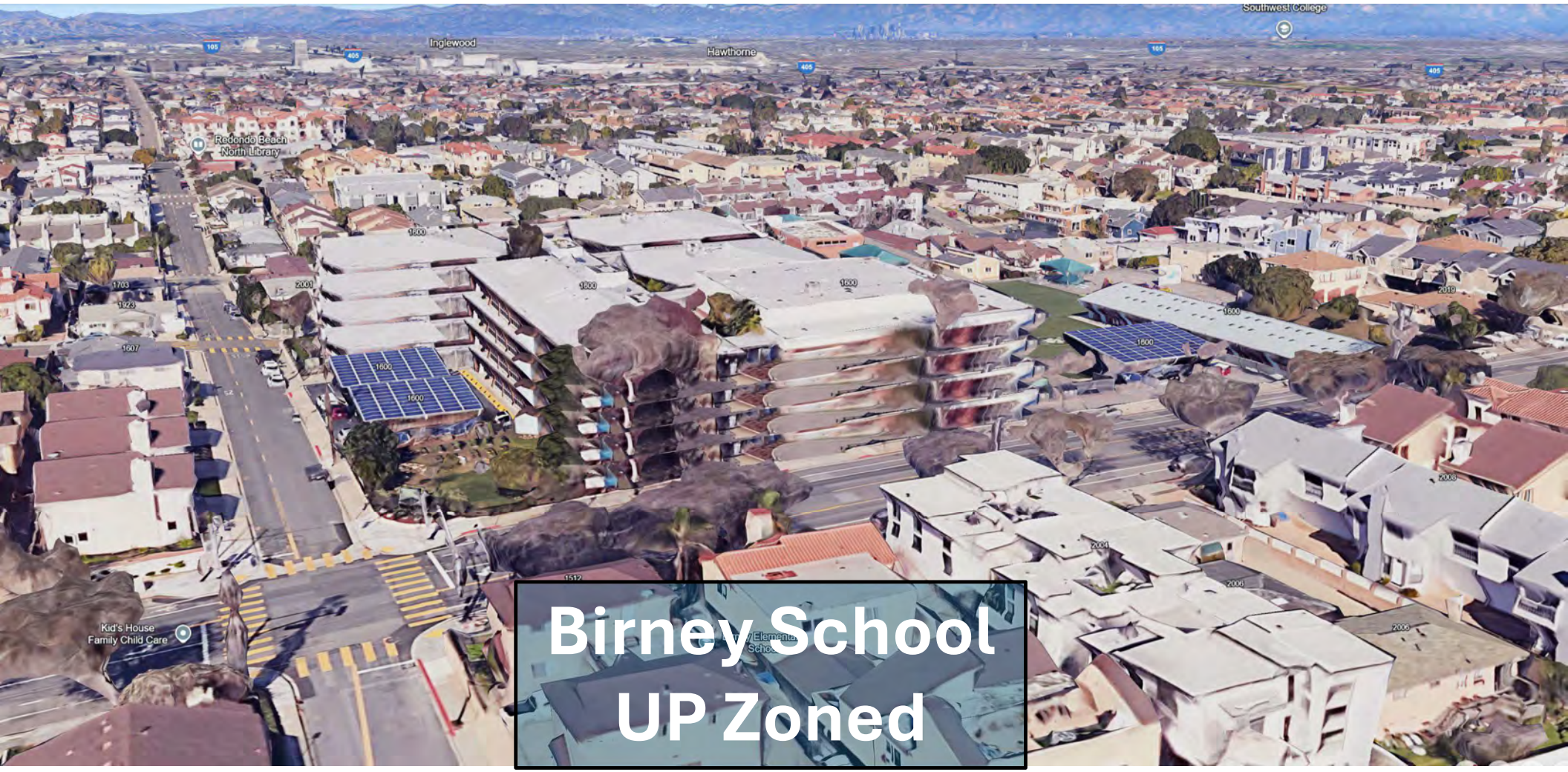
Alta Vista School
UP Zoned


Beryl Heights School
Beryl Heights Elementary School
Right At School
STOP
STOP
STOP



Beryl Heights School
UP Zoned


Southwest College
Inglewood
Hawthorne
Redondo Beach North Library
Kid's House Family Child Care
Birney School


Southwest College
Inglewood
Hawthorne
105
405
Redondo Beach
North Library
Kid's House
Family Child Care
Birney School
UP Zoned