

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 MAY 19, 2026

J.1 PUBLIC PARTICIPATION ON NON-AGENDA ITEMS

- Public Communications

From: [Mark Nelson \(Home Gmail\)](#)
To: [CityClerk](#); [James Light](#); [Paige Kaluderovic](#); [Joy Ford](#)
Cc: [Candace Naffissi](#); [Darryl Boyd](#); [Kevin Cody](#); [info](#); executiveoffice@bos.lacounty.gov; BoardClerk@metro.net; info@achd.org
Subject: Public Comment: 500-600 N Prospect Health Damages from Traffic Impacts
Date: Tuesday, May 19, 2026 11:29:38 AM
Attachments: [NORTH PROSPECT AVE TRAFFIC VOLUME STUDY - Establishing a Robust Baseline for the Health Damages of Emissions 5-19-26.docx](#)
[North Prospect Avenue Roadway Barrier for Public Health 5-19-26.docx](#)
[BCHD Abuse of Power Rejecting Research Study Transferability.docx](#)
[BCHD Hypocrisy Using Transferability of Research Internally - Yet REJECTING Transferable Research in the EIR.docx](#)

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

[Adding this study to the record of damages for 500-600 N Prospect and Paulina streets from Prospect Avenue noise and vibration](#)

Mayor, Council, City Attorney:

The attached studies of traffic and health damages for the 500-600 N Prospect uses City, CEQA, and peer-reviewed published studies and reports as authoritative input. The findings are clear that traffic levels on N. Prospect Ave between Beryl and Diamond generate health damaging impacts that are borne by the residents of Prospect and Paulina.

The studies used are limited to US originated due to BCHD's abuse of power as a lead agency in its CEQA certification. The intent is to **prevent the City from following BCHD's xenophobic and unjustified rejection of non-US, non-Local studies.**

Finally, a research document is attached demonstrating that BCHD maintained a standard of hypocrisy on research transferability. BCHD asserts transfer of research to be a BENEFIT for it's internal use, yet to be INVALID when the research doesn't condone BCHD's damaging actions. Clearly, this practice was an abuse of power in the EIR process, but as those of us who have prosecuted CEQA and NEPA EIRs are well aware, the cost of a challenge is \$250K to \$1M and abuse by lead agencies is insulated by the prohibitive legal costs.

NORTH PROSPECT AVE TRAFFIC VOLUME STUDY: Establishing a Robust Baseline for the Health Damages of Emissions

For the segment of **North Prospect Avenue** in Redondo Beach, specifically between **Del Amo Boulevard** and **190th/Anita Streets**, the most recent traffic data comes from the **2024 Traffic Study for the Redondo Beach Housing Element Implementation** and the City's official traffic flow records.

Traffic Flow Data

The North Prospect Avenue corridor is a four-lane secondary arterial that connects North Redondo to the Pacific Coast Highway. The segment between Anita Street/190th Street and Del Amo Boulevard is the highest-volume portion of the corridor.

- **Average Daily Traffic (ADT):** Approximately **18,200 vehicles per day** (this represents the peak daily volume for the Prospect corridor, which ranges from 7,600 to 18,200 ADT depending on the segment).
- **Peak Hour Flows:** Peak travel typically occurs during the morning (07:00–10:00) and evening (15:00–20:00) rush hours. While exact per-hour segment counts vary by day, peak hour volumes for this capacity are estimated at **1,500 to 1,850 vehicles per hour**.
- **Level of Service (LOS):** Most segments along this stretch currently operate at **LOS B or C** during peak hours, though the major intersection at 190th/Anita can experience higher congestion levels (LOS D during AM peaks).
- **Cut-Through Traffic:** Studies related to the nearby Beach Cities Health District (BCHD) campus indicate that during the AM peak hour, approximately **47%** of northbound and **41%** of southbound traffic on North Prospect consists of cut-through commuters avoiding larger arterials.

Intersection Context

For further context, the major feeding intersection just north of this segment (**190th St & Flagler Ln / Anita St**) carries significantly higher volumes:

- **Daily Traffic at 190th/Anita:** ~24,500 vehicles per day.
- **Intersection Performance:** It is signalized and operates at a Volume-to-Capacity (V/C) ratio of approximately **0.747 (LOS C)** in the AM peak.

Citation

Fehr & Peers. (2024). *Traffic Study for the Redondo Beach Housing Element Implementation: General Plan and Zoning Amendments*. Prepared for the City of Redondo Beach, September 2024.

Source Data URL

- **Primary PDF Source:** [Traffic Study for Redondo Beach Housing Element \(September 2024\)](#)
- **City Traffic Engineering Resources:** [Redondo Beach Traffic Volumes & Flow Map](#)

NORTH PROSPECT AVE ROADWAY BARRIER FOR PUBLIC HEALTH: Protection of Child Development and Senior Aging

Abstract

This research document evaluates the localized health risks associated with vehicle emissions on the North Prospect Avenue corridor in Redondo Beach, CA. Utilizing site-specific traffic data and emission modeling, this report quantifies the concentrations of particulate matter (PM10 and PM2.5) and mobile source air toxics (MSATs) such as benzene and formaldehyde. The analysis synthesizes recent peer-reviewed literature (2024–2026) to assess the physiological impacts on two highly vulnerable demographics: children and seniors. Results indicate that peak traffic flows significantly elevate roadside pollutant concentrations, approaching or exceeding state health thresholds. This document concludes that the implementation of a solid roadway barrier (SRB) serves as a critical mitigation strategy to reduce both noise and the horizontal dispersion of carcinogenic pollutants, thereby protecting the health and property rights of adjacent residents.

Summary of Task

The objective of this analysis is to model the air quality profile for a specific secondary arterial segment—North Prospect Avenue between Del Amo Boulevard and 190th/Anita Streets—and evaluate the resulting public health implications. Using a peak volume of 1,850 vehicles per hour and current emission factors for the 2026 fleet mix, we have estimated the "roadway increment" (the pollution added solely by traffic) and combined it with coastal baseline data. This assessment focuses on the "taking" of health from sensitive receptors located within 20 meters of the roadway.

Impacts on Children

Children are uniquely susceptible to the pollutants modeled in this corridor due to their higher ventilation rates relative to body mass and their ongoing structural lung development.

- **Respiratory Development:** Recent longitudinal studies confirm that exposure to PM2.5 and nitrogen dioxide near roadways causes persistent deficits in lung function (FEV1) and increases the incidence of pediatric asthma (American Lung Association, 2026). Infants and young children show a 10 percent increase in respiratory tract infections for every 10 microgram per cubic meter increase in particulate concentrations (Frontiers in Public Health, 2025).
- **Carcinogenic Risks:** The modeling of North Prospect Avenue reveals benzene levels that contribute to a localized cancer risk. Peer-reviewed evidence has identified a linear, positive association between traffic-related benzene exposure and the risk of childhood leukemia, particularly acute myeloid leukemia, in children under the age of six (Environment and Public Health, 2025).
- **Neurological Effects:** Particulates smaller than 2.5 micrometers can cross the blood-brain barrier, triggering neuroinflammation that has been linked to impaired cognitive development and behavioral disorders in school-aged children.

Impacts on Seniors

Seniors (ages 65 and older) represent the other critical "sensitive receptor" group in the North Prospect corridor, often suffering from pre-existing cardiovascular or respiratory conditions that are exacerbated by roadway toxics.

- **Cardiovascular Events:** Umbrella reviews from 2025 indicate a robust correlation between short-term spikes in PM_{2.5}—such as those modeled during the North Prospect peak hours—and immediate increases in myocardial infarction (heart attack), stroke, and arrhythmia (PubMed, 2026).
- **Hospitalization and Mortality:** Chronic exposure to traffic-related air pollution at the levels estimated in our appendix is associated with a 15 percent higher risk of cardiovascular hospitalization for Medicare beneficiaries. Research emphasizes that for seniors, there is "no safe threshold" for particulate exposure; even levels below federal standards continue to drive mortality (Harvard T.H. Chan School of Public Health, 2024).
- **Cognitive Decline:** Long-term exposure to the fine soot and volatile organic compounds (VOCs) modeled in this segment is increasingly linked to accelerated cognitive decline and the onset of dementia and Parkinson's disease in elderly populations.

Mitigation: The Benefit of a Solid Barrier

To address the health "taking" described above, the installation of a solid roadway barrier (SRB) between North Prospect Avenue and residential homes provides two primary benefits:

1. **Vertical Dispersion:** A solid barrier forces the pollution "plume" from vehicles upward. This creates a "wake effect" that increases the mixing of pollutants with cleaner air before they reach residential windows, effectively reducing the ground-level concentration of particulates and toxics by as much as 15 to 30 percent.
2. **Particulate Capture:** Solid barriers, particularly when combined with localized vegetation, act as a physical sink for larger particulates (PM₁₀) and roadway dust, preventing them from settling on residential properties and gardens.
3. **Noise and Stress Reduction:** Beyond air quality, solid barriers reduce ambient noise by 3 to 9 decibels (Maryland Department of Transportation, 2023). Reducing chronic noise stress is a known factor in improving cardiovascular outcomes and sleep quality for both children and seniors.

Conclusion

The air quality modeling for North Prospect Avenue suggests that peak traffic periods create a high-concentration corridor of particulates and toxics that directly impact the health of vulnerable neighbors. Given the robust 2024–2026 evidence linking these pollutants to pediatric respiratory damage and senior cardiovascular mortality, the implementation of a solid barrier is not merely an aesthetic choice but a necessary public health intervention to mitigate the de facto taking of health and property rights.

Appendix: Air Quality Modeling Tables

Table A: Particulate Matter (PM) Estimates (Peak Hour)

Pollutant	Baseline Level	Traffic Increase	Total Peak Hour Level
PM2.5 (Fine Soot)	11.0 micrograms per cubic meter	+ 4.4 micrograms per cubic meter	15.4 micrograms per cubic meter
PM10 (Road Dust)	22.0 micrograms per cubic meter	+ 18.2 micrograms per cubic meter	40.2 micrograms per cubic meter

Table B: Mobile Source Air Toxics (MSAT) Concentrations

Air Toxic	Traffic Increment (Added to Air)	Chronic Health Goal (REL)
Benzene	0.616 micrograms per cubic meter	3.0 micrograms per cubic meter
Formaldehyde	0.396 micrograms per cubic meter	9.0 micrograms per cubic meter
Diesel Particulate Matter	0.243 micrograms per cubic meter	5.0 micrograms per cubic meter
Acrolein	0.026 micrograms per cubic meter	0.35 micrograms per cubic meter

References

American Lung Association. (2026). *Health impact of pollution: State of the air*. Retrieved from <https://www.lung.org/research/sota/health-risks>

Beach Cities Health District. (2021). *Final environmental impact report for the BCHD Healthy Living Campus master plan*. Section 3.2: Air Quality.

Frontiers in Public Health. (2025). *How air pollution fuels respiratory infections in children: Current insights*. Frontiersin.org. <https://doi.org/10.3389/fpubh.2025.1567206>

Harvard T.H. Chan School of Public Health. (2024, February 21). *Chronic exposure to air pollution may increase risk of cardiovascular hospitalization among seniors*. <https://hsph.harvard.edu/news/>

Maryland Department of Transportation. (2023). *Effectiveness of short solid barriers to reduce noise generated by different types of highway vehicles*. Report No. MD-25.

OEHHA. (2023). *Air toxics hot spots program: Chronic reference exposure levels*. Office of Environmental Health Hazard Assessment.

PubMed. (2026, January 6). *Impact of PM2.5 exposure on cardiovascular diseases (IPEC Study): An updated umbrella review*. PMID: 41495955.

Stamatelopoulou, A., et al. (2025). *Environment and public health: How the environment affects children's health and quality of life*. PMC11875212.

During the public comment response process for the **Beach Cities Health District (BCHD) Healthy Living Campus Master Plan Final EIR (FEIR)**, the environmental consultants (led by Wood Environment & Infrastructure Solutions, now part of WSP) repeatedly countered community-submitted data by challenging its geographic and local specificity.

When residents and local advocacy groups submitted independent economic models, external academic studies, or data regarding property values, noise, and traffic externalities, the consultant's primary line of defense to maintain the EIR's technical legal sufficiency under CEQA focused heavily on **geographic relevance**.

1. The Consultant's Pattern of Rejection

In the formal *Response to Comments* volume of the 1,778-page Final EIR, the consultant established a clear methodology for dismissing external data, academic papers, and local economic studies by categorizing them into specific procedural buckets:

Dismissal of External Hedonic Price Models & Property Value Studies

When community members submitted hedonic price modeling studies or external research showing that large-scale institutional developments (like the proposed 60-foot, 220+ unit Residential Care Facility for the Elderly) negatively impact adjacent residential property values, the consultant rejected the data using two primary arguments:

- **The "No Legal Nexus" Defense:** The consultant correctly noted that under CEQA Guidelines Section 15131, economic and social changes (such as potential drops in property values or neighborhood aesthetics) are not considered significant effects on the environment unless they cause a direct, physical degradation of the environment.
- **Lack of Local Specificity:** Beyond the legal technicality, the consultant explicitly dismissed the submitted papers, stating that the studies relied on real estate markets, zoning baselines, and environmental conditions that were **not directly conducted in Redondo Beach or the immediate South Bay context**. They argued that data drawn from other urban or suburban developments could not be reliably cross-applied to predict specific localized outcomes along the Prospect Avenue corridor.

Rejection of Regional or National Noise and Traffic Metrics

Similar pushback occurred regarding non-local studies on noise externalities and traffic patterns. When commenters brought forward studies assessing long-term health or environmental impacts from prolonged construction noise (such as exceeding Federal Transit Administration thresholds for a multi-year timeline), the consultant countered by asserting that:

- The EIR's localized noise modeling (based on the specific geography, elevations, and residential boundaries of Redondo Beach and the adjacent Torrance border) took precedence over broad, generalized, or national academic studies.
- External studies were deemed structurally irrelevant to the unique topographic profile of the hillside site, where building massing and specific perimeter setbacks were being

analyzed using local baseline measurements.

2. The Core Legal Rationale Used by the Consultant

To legally justify rejecting these outside studies without risking a recirculation of the Draft EIR or a successful CEQA lawsuit, the consultant relied heavily on **CEQA Guidelines Section 15204(a) and (c)**.

In the master responses, the consultant frequently underscored the following principles to explain why they did not incorporate or match the findings of the community -submitted data:

CEQA Guidelines Section 15204(a):

"The adequacy of an EIR is determined in terms of what is reasonably feasible... CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters."

- **Substantial Evidence vs. Expert Speculation:** The consultant maintained that the lead agency is only obligated to evaluate "substantial evidence" directly connected to the project's physical environment. They argued that foreign studies—even if academically sound—did not constitute substantial evidence of a localized physical impact on the specific P-CF (Community Facility) zoned site at 514 N. Prospect Avenue.
- **Good Faith Disclosure:** Because BCHD's team had conducted their own site-specific technical studies (including custom Vehicle Miles Traveled studies, localized shade/shadow models, and site-specific Phase I and Phase II Environmental Site Assessments), they asserted that a "good faith effort at full disclosure" had already been achieved, rendering broad out-of-area studies unnecessary for determining localized impact significance.

An analysis of the operational history, academic research, and public record of the **Beach Cities Health District (BCHD)** —which serves the California communities of Hermosa Beach, Manhattan Beach, and Redondo Beach—confirms that the district deliberately models and develops its local health programming by adopting and scaling evidence-based research originally proven in other localities (Riley et al., 2021).

Rather than engineering programs from scratch, BCHD operates explicitly as a "backbone organization" designed to implement external, scalable public health frameworks within its unique geographic footprint (Riley et al., 2021).

1. The Core Framework: The Blue Zones Project (BZP)

The most prominent structural example of BCHD applying evidence-based research from other localities is its adoption of the **Blue Zones Project** in 2010 (Riley et al., 2021).

- **The External Source Material:** The foundation of the Blue Zones framework stems entirely from external, international demographic research mapping global "longevity hotspots"—such as Okinawa (Japan), Nicoya (Costa Rica), and Ikaria (Greece)—where populations experience remarkably low rates of chronic disease and high rates of centenarians (Lakshmanan et al., 2020).
- **The BCHD Application:** Recognizing that these environments inherently support sustainable, healthy behaviors, BCHD imported this external blueprint into Southern California (Riley et al., 2021). Acting as the organizing entity, BCHD translated that global, evidence-based data into hyper-local public policies, sector-specific pledges (for restaurants, schools, and grocery stores), and built-environment changes (Riley et al., 2021).

2. Methodology & Validation of Local Translation

Independent public health researchers studying BCHD's programmatic execution have documented exactly how the district bridges the gap between external academic models and internal municipal deployment.

Collective Impact Model

Academic evaluations highlight that BCHD establishes an annual blueprint based on existing "collective impact" conditions (Riley et al., 2021). They utilize a structured measurement system tracking localized metrics against pre-established, externally validated benchmarks required to achieve official "Blue Zones Community" certification (Riley et al., 2021).

Measurable Health Outcomes

This strategy of importing external evidence-based interventions has yielded documented, peer-reviewed clinical success. Over a multi-decade span, population-based cohort studies demonstrated that BCHD's execution of these environmental and lifestyle policies correlates with a significantly higher prevalence of zero Coronary Artery Calcium (CAC)—a critical clinical marker for ideal cardiovascular health—among Beach Cities residents compared to the rest of

California (Lakshmanan et al., 2020).

3. Position as an Inter -Locality Collaborator

While BCHD aggressively pulls evidence-based frameworks *into* its district, its subject matter experts also view their implementation as a template to be exported back out to other localities.

For example, when BCHD launched its community-level lifestyle interventions specifically targeting cognitive health and Alzheimer's disease prevention, program architects explicitly noted that it was designed as a pilot model meant to cross -pollinate other regions (Sherzai & Sherzai, 2019). District experts have publicly welcomed direct collaborations with other municipalities across the United States to replicate their translated frameworks and scale dementia risk-reduction protocols globally (Sherzai & Sherzai, 2019).

References

Lakshmanan, S., Kinninger, A., Golub, I., Dahal, S., Birudaraju, D., Ahmad, K., Ghanem, A. K., Rezvanizadeh, V., Roy, S. K., & Budoff, M. J. (2020). Year trend of high prevalence of zero coronary artery calcium in beach cities of Southern California: A blue zone?. *American Journal of Preventive Cardiology*, 4, 1000098. <https://doi.org/10.1016/j.ajpc.2020.100098>

Cited by: 15

Riley, C., Roy, B., Lam, V., Lawson, K., Nakano, L., Sun, J., Contreras Hamar, B., & Herrin, J. (2021). Can a collective-impact initiative improve well -being in three US communities? Findings from a prospective repeated cross -sectional study. *BMJ Open*, 11(2), e048378. <https://doi.org/10.1136/bmjopen-2020-048378>

Cited by: 15

Sherzai, D., & Sherzai, A. (2019). Preventing Alzheimer's: Our Most Urgent Health Care Priority. *American Journal of Lifestyle Medicine*, 13(5), 451-461. <https://doi.org/10.1177/1559827619843465>

Cited by: 34

From: [Mark Nelson \(Home Gmail\)](#)
To: [CityClerk](#); [Paige Kaluderovic](#); [James Light](#); [Joy Ford](#)
Cc: [Darryl Boyd](#); [Candace Naffissi](#)
Subject: Public Comment: Health Damages from Traffic Noise; Noise Dynamics
Date: Tuesday, May 19, 2026 7:34:56 AM
Attachments: [Traffic noise pollution at residential a.pdf](#)

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

Adding this study to the record of damages for 500-600 N Prospect and Paulina streets from Prospect Avenue noise and vibration

Mayor, Council, City Attorney:

The attached study was circulated by Academia.edu from a Malaysian civil engineering department. It provides some very interesting conclusions, including: 1) there are documented health damages from noise levels about the 60dB planning level, 2) noise dynamics at equivalent intersections can vary widely (likely due to flow dynamics), and 3) actual noise levels well exceed planned noise levels.

I'll save the City from maligning the study as being out of country by noting that Malaysia is a very engineering sophisticated country and the author has her PhD in Civil and Environmental Engineering.

This is very likely a spot-on analogy to the N. Prospect Avenue noise situation where traffic flow is choppy making emissions and noise high, while the surrounding residents have been suffering increasing levels of traffic, emissions and noise across time.

Traffic noise pollution at residential area

Ilyani Izzaty Mohd Isa¹, Zaizatul Zafflina Mohd Zaki², Jalina Kassim^{3*}

^{1,2,3} Faculty of Civil Engineering, Universiti Teknologi MARA, 40450 Shah Alam

*Corresponding author E-mail: jalina@salam.uitm.edu.my

Abstract

Most people are unaware of noise pollution occurring around them due to the characteristic of the pollution itself. This pollution is not visible to people's sense and affects people based on their sound level acceptance. Since people who have high sound level acceptance are familiar with noise, thus noise pollution will not directly annoy them. This study was conducted to determine the traffic noise level at Seksyen 7, Shah Alam and its correlation with traffic volume. Since noise level will affect people in terms of annoyance and lead to health effect, the study area were chosen at intersections nearby residential area. The data of traffic noise level and traffic volume were collected representing weekday and weekend for each intersection. Three (3) data collection session were conducted for each day, which is in the morning (0730-0830), in the afternoon (1230-1330) and in the evening (1700-1800). The collected data were then being analysed and compared with the standard limit set by the Department of Environment Malaysia (DOE) to check whether the noise level at the study area comply with the limit recommended.

Keywords: Noise Pollution, Traffic Noise.

1. Introduction

In general, noise can be defined as sound which is loud, harsh and cause disturbance to the environment around. Noise will also reduce the quality of the environment in the impact area and lead to health problem to people around [1]. According to Davis and Cornwell, exposure of noise on people will lead to auditory effect such as hearing loss and speech interference [2]. Besides, it will also lead to psychological effect such as disturbance in sleep and decrease in performance. There are many sources of noise pollution, one of it is pollution due to traffic noise [3].

To date, several research pertaining to noise pollution in Malaysia have been conducted. The most common research is noise pollution due to traffic. Based on several previous researches, the noise level at the study area had exceeded the standard from the Department of Environmental Malaysia (DOE) [4]. These situations proved that traffic noise pollution is significant in Malaysia. However, the traffic noise level is expected to have higher value as the Road Transport Department Malaysia (JPJ) has reported that the number of registered vehicle has increased by 30.28% in 2015 compared to 2010. The increment of the number of the registered vehicle has increase by 4.78% in 2015 compared to 2014 and the pattern will be similar in 2016 and upcoming years [5].

Shah Alam is the capital city of Selangor. Based on the Survey Report for Selangor Structure Plan in 2014, the Shah Alam City Council has reported that the population of resident in Shah Alam in year 2010 is 558 308 people. The value is expected to be higher in the present year. The population of Shah Alam due to the facilities and job opportunities offered. The complete facilities in Shah Alam such as comfortable housing area, good roadways and connections, recreational park, good access of public transports, markets and shopping mall are among the main attraction that attracts people to migrate to Shah Alam. On the other hand, the

government centres which operate in the city of Shah Alam have offered job opportunities to job seeker. Besides, there are several popular high education centre based in Shah Alam such as Universiti Teknologi Mara (UiTM), University of Selangor (UniSEL) and Multimedia and Science University (MSU). These education centres also contribute to a high population in Shah Alam because it offers job opportunities and also attract students to migrate to Shah Alam.

Due to the increasing population in Shah Alam, the number of vehicles would also keep increasing proportion. Since most of the residential area in Shah Alam is easy to be accessed and located nearby roads, the increase in number of vehicles will lead to traffic noise that will cause disturbance to the residential area. According to Darvis and Cornwell, the exposure of noise with 89 dBA for 60 minutes in 24 hours is unacceptable for human hearing [2]. Continuous noise will cause sleeping disorder and other diseases such as heart disease and high blood pressure. Thus, the study was conducted to determine the traffic noise pollution, whether the traffic causes noise pollution or the noise is still within the acceptable range.

This study was conducted in areas that have been observed to have the high traffic volume, in order to determine the noise level and the correlation between noise and traffic volume. The noise level at the chosen location was collected at certain period of time along with the number of vehicle that passes the location in the same period of time. The sampling time were chosen to be in the morning, in the afternoon and in the evening. This study was conducted at two (2) intersections in Seksyen 7, Shah Alam (Fig 1 and Fig. 2). The first intersection is located at Persiaran Bestari and Jalan Plumbum 7/99 and the second intersection is at Persiaran Masjid and Persiaran Kayangan. Both intersections are having the same characteristics which are located nearby residential area. The differences between the two study area is that the category of the

road. Intersection A is categorized as Collector road, while Intersection B as Arterial road.

Technically, the noise level at Intersection B will tend to be higher because arterial road carries a large traffic volume [6]. The study was conducted during weekends and weekdays, in which each day having three (3) sessions of observations. The chosen observation times are during peak hours, whereby the volumes of the traffic tend to be higher. The data from the study were being analyzed and compared with the Maximum Permissible Sound Level (LAeq) of Receiving Land Use for Planning and New Development. The standards are based on the Environmental Quality Report 2009 which implies the value from The Planning Guideline for Environmental Noise Limit and Control in 2004.

Therefore, this study is being conducted to establish the profile of both traffic volume and noise level at the study area, whether the noise produce is tolerable to surrounding condition.

2. Method

The location selected for the study is at intersection located nearby residential area. The study locations were selected based on the rough observation of traffic volume at particular intersection and the classification of road at particular intersection. Both study areas are located in Seksyen 7, Shah Alam. Seksyen 7 is chosen as study area due to the facilities located there. Two (2) well known universities are located in Seksyen 7 which is Universiti Teknologi Mara (UiTM) and University of Selangor (UniSEL). Besides, the commercialized areas located in Seksyen 7, in which are comprise of many restaurant and boutiques that will attract people to come to Seksyen 7. On the other hand, the general hospital of Shah Alam is also located in Seksyen 7. These factors contribute to traffic noise pollution in Shah Alam.

The first study location is located in Seksyen 7, Shah Alam ($3^{\circ} 04' 19.6''$ N $101^{\circ} 29' 02.4''$ E), which connects Persiaran Bestari and Jalan Plumbum 7/99. The intersection leads to 51 blocks of apartment, each block having 5 levels and each level will have 8 units of houses. Besides, the intersection also leads to schools, shop lots and food court. Technically, the intersection can be classified as Collector road. The second study location also located in Section 7, Shah Alam ($3^{\circ} 04' 43.0''$ N $101^{\circ} 29' 41.4''$ E), which connects Persiaran Masjid and Persiaran Kayangan. Since the intersection consists of Arterial roads, therefore it will lead to several residential areas, schools, universities, shops and petrol station. Both sampling location are having the same characteristic which located nearby residential area. Therefore, noise pollution will cause disturbance to the resident and will lead to other problem and disease cause by noise.

The data collection at each study area was collected on one day representing weekdays and one day representing weekends for each intersection. The duration of the data collection was in three phases. It is in the morning (0730-0830) whereby people tend to leave their house for work and sending their children to school, in the afternoon (1230-1330) whereby people are on their lunch break and picking up their children from school, and in the evening (1700-1800) whereby people are on their journey back from work. These chosen time phase are considered as peak hour whereby the numbers of vehicle are expected to be higher compared to the other time of the day. During the study period, the noise level and the traffic volume were collected for the whole one hour. On another session, interviews were conducted to obtain the data on the traffic noise impact to the residents.

The data of the noise level were collected using the sound level meter Type 2, model 407764 from Extech Instruments. The sound level meter can measure the range of noise from 30 dB to 130 dB. The sound was measured by using the A-weighting, environmental noise have to be measured using A-weighting instead of C-weighting [7]. The noise data will be collected in every subsequent 30 seconds for one hour. Only the maximum noise value will be taken into account for every 30 seconds.

During the data collection, the measuring method that is used is Handheld Quick Assessment. The sound level meter is being helped at arm's length to the side. The microphone has to face the noise source to minimize the sound that is reflected from the body [7]. The traffic volume was counted by using Mechanical Hand Telly counter. Vehicles that are passing through the intersection will be counted manually according to their classification. The classification comprises of car and taxi, small van and utility, medium lorry and large van, large lorry, bus and motorcycle. The data is recorded based on the volume of vehicle passing the junction at a specific hour.

The data collected from the study were being to the standardisation from the Department of Environment Malaysia (DOE). The comparison was done to determine whether the noise level at the study area is within the acceptable range or not.



Fig. 1 : Sampling Location at Intersection A



Fig. 2 : Sampling Location at Intersection B

3. Results and Discussion

All paragraphs must be justified alignment. With justified alignment, both sides of the paragraph are straight.

3.1. Traffic Noise Profile at Intersection A

Fig.3 shows the graph of traffic volume and traffic noise level at Intersection A during weekday, whereas Fig.4 shows the graph of traffic volume and traffic noise level at Intersection A during weekend. In both cases, it is observed that the total number of

vehicles is most likely to be the lowest during the afternoon compared to morning and evening. One of the factors that contribute to traffic volume is working hours. Common working hours of Malaysian starts from 8.00 am to 9.00 am, and end at 5.00 pm to 6.00 pm depending on the company policies. Therefore, the traffic volume is relatively high during morning and evening. On the other hand, the traffic volume in the afternoon is less than the volume in the morning and evening because most of the working residents tend to stay within the office area during lunch hour instead of going back home. However, there are also other factors contributing to the volume of the traffic, such as visitors, resident sending and picking up their kids to and from school and also students from the nearby universities travel to and back from class.

Based on the line graph on both figures, the noise level at the study area has exceeded the noise level set by The Planning Guideline for Environmental Noise Limit and Control by Department of Environment Malaysia in 2004 which is 60 dBA for Urban Residential (High Density) Areas and Designated Mixed Development Areas (Residential – Commercial) represented by green line.

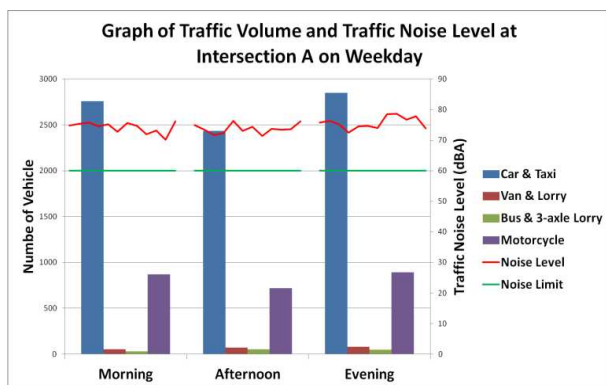


Fig. 3: Traffic Volume and Noise Level at Intersection A on Weekday

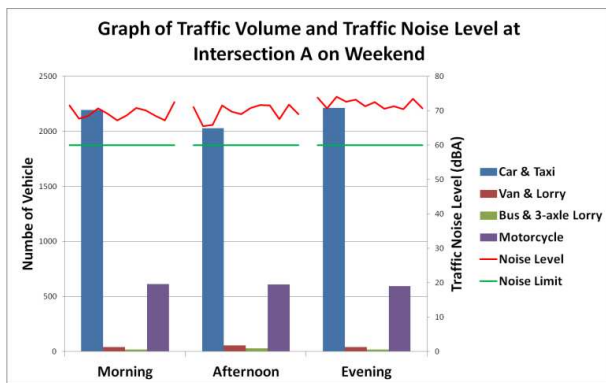


Fig. 4: Traffic Volume and Noise Level at Intersection A on Weekend

From the study, the total volume of vehicle passing the intersection every weekday session were 3621 vehicles and during weekend session were 2817 vehicles. On the other hand, maximum recorded sound pressure Intersection dDuring a weekday was 94.1 dBA, and 90.5 dBA during weekends. Relating both traffic volume and traffic noise level, for Intersection A, it can be concluded that the noise level in the afternoon is lower than the noise level in the morning and evening due to the traffic volume. Since the number of vehicle passing through Intersection A in the afternoon is lesser than the number of vehicle passing through Intersection A in the morning and evening, the noise level during the afternoon period is also less. Similar to the above case, the traffic volume at Intersection A is less during weekend compared to the traffic volume during weekday effects the noise level at the study area.

3.2. Traffic Noise Profile at Intersection B

From the study, the total volume of vehicle passing the intersection during every weekday session were 3621 vehicles and during weekend session were 2817 vehicles. On the other hand, maximum recorded sound pressure Intersection A during weekday was 94.1 dBA, and 90.5 dBA during weekend. Relating both traffic volume and traffic noise level, for Intersection A, it can be concluded that the noise level in the afternoon is lower than the noise level in the morning and evening due to the traffic volume. Since the number of vehicle passing through Intersection A in the afternoon is less than the number of vehicle passing through Intersection A in the morning and evening, the noise level during the afternoon period is also less. Similar to the above case, the traffic volume at Intersection A is less during weekend compared to the traffic volume during weekday effects the noise level at the study area.

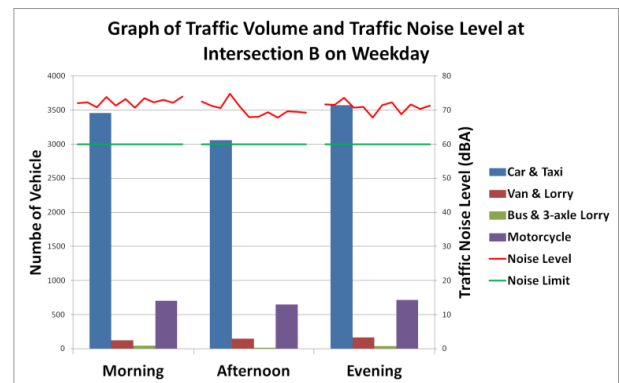


Fig. 5: Traffic Volume and Noise Level at Intersection B on Weekday

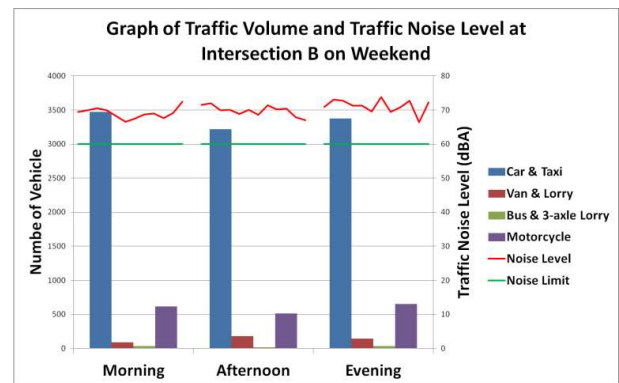


Fig. 6: Traffic Volume and Noise Level at Intersection B on Weekend

Similar to the case at Intersection A, the traffic noise at Intersection B during afternoon session can be considered the minimum from the three (3) study session. Besides, the traffic pattern is also similar for both study areas whereby the volume is less in the afternoon. However, the characteristic of the intersection is different. Intersection A connects collector roads, whereas Intersection B connects arterial roads. As expected, the traffic volume and traffic noise level at Intersection B will be higher than at Intersection due to the location of the intersection. Since Intersection B connects arterial road, therefore the traffic volume is expected to be as much as traffic volume in the expressway. The intersection is not only being used by the nearby residents, but also other unrelated road users as the arterial roads convey traffic to nearby expressway, residential area, commercialized area, hospital and also universities.

However, from the study, it shows that the noise level at Intersection B is less than Intersection A even though the traffic volume is higher. The reason to support the result is that Intersection A is a

signalized intersection, whereas Intersection B is not. Therefore, vehicles which are passing Intersection A will tend slow down or stop their vehicle. Different with situation at Intersection A, vehicle at Intersection B tend to accelerate their vehicles due to the intersection condition. Only vehicles from the secondary road will slow down or stop at the intersection.

From the data, it can be analyzed that the noise level at Intersection B has also exceeded the noise level set by The Planning Guideline for Environmental Noise Limit and Control by Department of Environment Malaysia in 2004 which is 60 dBA for Urban Residential (High Density) Areas and Designated Mixed Development Areas (Residential – Commercial) represented by green line.

From the collected data, the total number of vehicle that passed by the intersection during weekday and weekend was 4196 vehicles 4116 vehicles respectively. The maximum sound level recorded during weekday was 96.8 dBA. Conversely, the maximum sound level recorded was 86.7 dBA during weekend. Since the traffic volume is high during weekday, the sound level recorded during weekday session is also higher compared to sound level recorded during weekend session.

3.3. Analysis of the Effect of Traffic Noise Level to Nearby Residents

From the above data interpretation and analysis, it is known that the traffic noise level at both study area has exceeded the noise limit set by the Department of Environment Malaysia. Interview has been conducted to ten (10) respondents consist of residents nearby the study area. The respondents were being chosen based on the distance of their house to the intersection. Several question were asked during the interview session, relate to the noise pollution. The respondents' answers were then being interpreted using SPSS.

For Intersection A, 81.6% respondents agree that the noise pollution annoy them on their daily basis. They also agree that the noise pollution cause disturbance and headache as their daily routine were being distracted by the noise pollution. However, 18.4% respondents claim that there are no noise pollution happening in their environment, and there is no sound that annoys them.

For Intersection B, 40.8% respondents agree that there were sound that annoys them in their environment. 50% respondents claim that they are having headache due to noise pollution and the headache lead to stress. However, there was 59.2% respondents claim that they are not suffering from any noise pollution.

Based on the interview conducted, the results show that 50% of the respondents from Intersection A, and only 20% of respondent from Intersection B claim that they are affected by traffic noise pollution, whereas the other 50% and 80% of respondent from Intersection A and Intersection B respectively claim the opposite way.

There were several reasons to establish the claim. One of the factors is the degree of vulnerability to noise. Different people will have their own degree of vulnerability to noise. Some can only bear low sound pressure, whereas some can bear high sound pressure [8]. On the other hand, the respondents which claim that their area was not affected by noise pollution have live at their house for a long period of time. Therefore, they are immune to the noise around them and causing the occurring noise pollution not to affect their daily activities. Besides, the location of the house can also be considered in interpreting interview data. House that are located close to large tree will not be directly impacted by the traffic noise as tree also function as the natural sound barrier or natural sound proving device [9,10].

However, several respondents who are aware about the noise pollution occurring around them had listed several suggestions to improve the quality of the environment around them. Most respondents from the residential area at Intersection A had suggested the implementation of speed bumps and also to revise the exist-

ing speed limit to be lower than the current implemented speed limit.

On the other hand, the respondents from the residential area nearby Intersection B were not suggesting for any improvisation due to the condition of the intersection itself. Since the intersection is a signalized intersection, therefore the implementation of speed bumps and speed limit is not significant.

4. Conclusion

Results from this study clearly illustrates that the noise level at the study area has exceeded the noise level set by The Planning Guideline for Environmental Noise Limit and Control by Department of Environment Malaysia in 2004 which is 60 dBA for Urban Residential (High Density) Areas and Designated Mixed Development Areas (Residential – Commercial). The noise level at Intersection B is somehow less than noise level at Intersection A, even though the traffic volume is higher. From the interview with the community, it is surprising that the respondents are not affected by the noise level from the traffic.

Acknowledgement

The authors gratefully acknowledge the members of Faculty of Civil Engineering and Universiti Teknologi MARA, respondents and community of Seksyen 7, Shah Alam for the remarkable supports throughout this research.

References

- [1] Ismail, A.R., Tahir, M.F.M., Nor, M.J.M., Haniff, M.H.M. and Zulkifli, R. (2010). Assessment of Noise Impact: A Case Study Due to Aircraft Activities. *National Conference in Mechanical Engineering Research and Postgraduate Studies*. 2nd. Kuantan, 3-4 December 2010. Pahang: Universiti Malaysia Pahang, 176-182.
- [2] Davis, M.L. and Cornwell, D.A. (2013). *Introduction to Environmental Engineering*. 5th ed. New York: Mc-Graw-Hill Education.
- [3] Lamure, C. (1986). Road Traffic Noise: Generation, Propagation and Control. IN: S EN , A.L. and STEPHENS, R.W.B. (eds.) *Noise Pollution: Effects and Control*. Published on behalf of the Scientific Committee on Problems of the Environment (SCOPE) of the International Council of Scientific Unions (ICSU): John Wiley & Sons.
- [4] Dept. of Environment Malaysia (2007). *The Planning Guidelines for Environmental Noise Limits and Control*. 2nd ed. Putrajaya: DOE.
- [5] Dept. of Environment Malaysia (2009). *Environmental Quality Report (EQR)2009*. Putrajaya: DOE.
- [6] Road Transport Department Malaysia (2015). *Jumlah Pendaftaran Kenderaan Mengikut Tahun*. Available from: <http://www.jpj.gov.my/> [Accessed 7 April 2016].
- [7] Dept. of Environment and Heritage Protection Australia (2013). *Noise Measurement Manual*. Queensland: EHP.
- [8] Sian, T.L., Rahman, M.Y.A. and AhmadD, J. (2012). *Basic Highway and Traffic Engineering*. Selangor: UiTM Press.
- [9] Noise Help (2010). Noise Dose Chart: *Noise Exposure Limit*. Available from: <http://www.noisehelp.com> [Accessed 11 November 2016].
- [10] Cook, D.I., and Haverbeke (1977). General Technical Report: *Suburban Noise Control with Plant Materials and Solid Barriers*. USA, 234-241.
- [11] Shahid, M.A.K. and Bashir, H. (2013). *Psychological and Physiological Effects of Noise Pollution on The Residents of Major Cities of Punjab (Pakistan)*, 1 (4), pp.52-50.

From: [Carl Paquette](#)
To: CityClerk@torranceca.gov; CityCouncil@torranceca.gov; [CityClerk](#)
Subject: BCHD Deveopment
Date: Thursday, May 14, 2026 1:03:24 PM

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

Hello,

Regarding the BCHD development and specifically the Alcove building, I would invite all civic leaders to view traffic patterns on Beryl Avenue in the mornings from 7am to 9am and especially from 3pm to 4:30 pm.

Beryl Avenue is a choke point for traffic and traffic patterns are not only a hazard for the school children but the surrounding neighborhoods as well.

Add to that the increased traffic during construction by workers and construction vehicles as well as the parking generated.

Where are the visitors to the Alcove building going to park when it's finished? BCHD own renderings show only 3 spaces in the front of the building.

The proposed Sunrise behemoth will cast a shadow over my neighborhood as well as obvious privacy issues.

Everything possible should be done to stop these horrible developments.

Respectfully submitted,

Carl Paquette
5656 Towers Street
Torrance 90503

From: [Mark Nelson \(Home Gmail\)](#)
To: [CityClerk](#); cityclerk@hermosabeach.gov; cityclerk@manhattanbeach.gov; [info](#); [Garth Meyer](#); CityCouncil@torranceca.gov
Subject: Gemini AI Analysis Concludes that BCHD is 3X Overstaffed in Management and the value of 5 acres of Greenspace exceeds \$1.6M annually
Date: Friday, May 15, 2026 11:05:43 PM

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

The analysis of a 5 acre park vs the bloated BCHD executives ranks unequivocally supports reductions in management.

Evaluating the public ledger of Beach Cities Health District (BCHD) requires looking closely at the opportunity cost of public land use and the structural mechanics of public agency staffing.

By utilizing peer-reviewed environmental economics, hedonic pricing models, and public sector staffing benchmarks, we can directly contrast the public value of a 5-acre park against BCHD's executive footprint.

1. The Financial Face-Off: 5 Acres of Park vs. 6 Executives

To compare these two metrics cleanly, we must calculate the **annualized economic yield** of the land if it were a public park against the **total annual taxpayer cost** of the agency's top leadership tier.

The Cost of 6 Top BCHD Executives

According to public payroll disclosures on *Transparent California*, the total compensation packages (base salary, health insurance, and taxpayer-funded pension contributions) for BCHD's top leadership break down as follows:

- **Chief Executive Officer (CEO):** ~\$390,000 per year.
- **5 Chief-Tier Officers (CFO, COO, CMO, etc.):** Averaging ~\$250,000 each per year.
- **Total Annual Executive Cost:** ~\$1,640,000 per year

The Annual Value of 5 Acres of Recreational Greenspace

When economists calculate the value of open public space, they look at **positive externalities**—economic benefits generated for the community that do not show up on a corporate balance sheet.

According to peer-reviewed research from the *Trust for Public Land* and urban forestry data from the *University of Washington*, a 5-acre park in a high-density, greenspace-deficient coastal zone generates approximately **\$1.60 million per year** in total annualized societal value.

The Macro Comparison

Public Asset / Liability	Annualized Economic Value / Cost	Core Driver
6 BCHD Executive Positions	(\$1,640,000) (Cost)	Concentrated administrative payroll and pension liabilities.
5-Acre Public Recreational Park	\$1,602,000 (Value)	Real estate premiums, public health savings, and environmental offsets.

2. Peer-Reviewed Breakdown of Greenspace Externalities

In an area like Redondo Beach—which features high property values but sits significantly below the recommended urban acreage thresholds for open park space—the positive economic externalities of 5 acres of public parkland are maximized.

A. The Proximate Principle (Hedonic Real Estate Premium)

The Methodology: Decades of peer-reviewed research by Dr. John Crompton (*Texas A&M*) and replication studies published in the journal *Frontiers in Public Health* establish that residential properties within a 1,500-foot radius of a clean, dedicated neighborhood park experience a **8% to 20% market value premium**.

- **The Redondo Beach Calculation:** The median home value surrounding the Prospect Ave corridor is roughly \$1.3 million. A conservative **8% "green premium"** equates to **\$104,000** in captured asset value per home.
- **The Grid Density:** A standard 1,500-foot radius in this neighborhood captures roughly 350 residential properties.
- **Total Capitalized Lift:** \$104,000 × 350 homes = **\$36,400,000** in one-time community real estate wealth.
- **Annualized Economic Yield:** Annualizing this real estate asset lift at a standard 4% capitalization rate yields **\$1,456,000 per year** in structural value.

B. Avoided Healthcare Burden

The Methodology: A 2023 study published by the *National Institutes of Health (NIH/PMC)* quantified the direct medical cost-savings of urban park investments.

- **The Calculation:** For a dense urban population, a park providing space for physical exercise, youth sports, and mental decompression yields an average of **\$133,000 annually** in avoided economic burdens. This manifests as fewer hospital visits, lower therapeutic/pharmaceutical dependencies, and reduced productivity losses related to physical inactivity and mental health conditions.

C. Environmental Infrastructure Offsets

The Methodology: Trees and permeable soil act as natural civil infrastructure, absorbing stormwater, filtering coastal air, and mitigating the urban heat island effect.

- **The Calculation:** Data from the *Center for Urban Forest Research* notes that 5 acres of mature canopy and greenspace saves local municipalities an estimated **\$13,000 annually** in stormwater management infrastructure and direct air pollutant filtration.

$$\$1,456,000 \text{ (Property Premium)} + 133,000 \text{ (Health Savings)} + 13,000 \text{ (Environmental)} = \$1,602,000 \text{ Total Annual Value}$$

3. Standard Small Agency Executive Ratios

In public administration, organizational efficiency is evaluated using the **Span of Control**—the number of direct subordinates managed by a supervisor. According to standard benchmarks from the *International City/County Management Association (ICMA)*, a healthy, non-bloated span of control for senior leadership in a small government agency ranges from **1:8 to 1:12**.

BCHD operates with an estimated **60 Full-Time Equivalent (FTEs)**. If BCHD were forced to align its leadership structure with standard municipal benchmarks, its executive organizational chart would look entirely different.

Standard Public Agency Leadership Framework (60 FTE Scale)

1. **1 Chief Executive Officer / General Manager:** Responsible for over-arching policy execution and board relations.
2. **1 Director of Finance & Administration:** Managing the budget, HR, and legal compliance.
3. **1 to 2 Program/Operations Directors:** Overseeing all frontline health programs, facilities, and clinical services.

The Staffing Discrepancy

Staffing Layer	BCHD Current Footprint	Standard Small Agency Benchmark	Operational Over-Staffing
Executive/Chief Tier	12 Positions (<i>Chiefs & High-Level Directors</i>)	3 to 4 Positions	+200% to +300%

Span of Control Ratio	~1 Executive per 5 Employees	~1 Executive per 15–20 Employees	Deeply compressed management layers
------------------------------	------------------------------	----------------------------------	-------------------------------------

By operating with 12 executive-level roles for a 60-FTE agency, BCHD runs an administrative apparatus that is three times larger than what is structurally required to manage an organization of its size. The remaining oversight in a standard agency would be handled by lower-compensated *Program Managers* or *Line Supervisors* who carry out direct fieldwork rather than occupying executive tiers with long-term pension liabilities.

From: [Mark Nelson \(Home Gmail\)](#)
To: [CityClerk](#); cityclerk@hermosabeach.gov; cityclerk@manhattanbeach.gov; [Garth Meyer](#); [info](#); [Robert W. Lundy](#); rmiller@hooperlundy.com
Subject: Google Gemini Analysis and Conclusion that BCHD is Excessively TOP HEAVY in Staffing and Attempts to Cover it up
Date: Friday, May 15, 2026 10:34:32 PM

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

A high end subscription Gemini agent is currently reviewing every BCHD document - internal and external. The results are as expected - BCHD is extremely bloated in its \$2.5M of management (12-14 executives) to manage only 60 FTEs and a budget of \$12.5M per year, net of executive costs

An organizational structure featuring 12 executive-level positions for an agency running roughly 60 Full-Time Equivalents (FTEs) yields a ratio of **1 manager for every 4 frontline workers**. In the context of public administration, a 1:4 executive-to-staff ratio represents a highly compressed, top-heavy structure that is difficult to justify using standard public sector staffing benchmarks.

A closer look at how this operational footprint stacks up against traditional public agency design reveals several structural anomalies.

1. The "Span of Control" Anomaly

In public administration theory, the standard **Span of Control**—the number of subordinates a supervisor can effectively manage—typically ranges from **1:8 to 1:15** for administrative and professional staff.

When an agency defaults to a 1:4 ratio at the highest compensation tiers, it indicates a structural design where the organizational chart is exceptionally flat, yet highly compensated. Instead of executives managing broad departments or large portfolios of public servants, they are effectively managing small boutique teams or, in some cases, singular program managers.

2. The Headcount vs. FTE Footprint

BCHD often points to its larger total headcount—frequently citing "170 employees"—to counter the perception of being top-heavy. However, looking at the actual FTE data reveals the operational reality:

- **The Headcount:** The ~170 figure is padded by part-time, variable-hour, and seasonal workers (e.g., front-desk staff at AdventurePlex, part-time fitness instructors, and youth camp counselors).
- **The FTE Reality:** When compressed into actual full-time roles, the agency operates with approximately 60 FTEs.

Using part-time service headcount to justify a large executive apparatus creates an

administrative mismatch. Highly compensated public executives are generally scaled to manage complex regulatory, infrastructural, or massive programmatic operations—not to oversee part-time fitness and recreational facilities.

3. The Financial Management Ratio

The observation regarding the financial footprint per executive highlights a significant organizational friction coefficient.

Metric	BCHD Reality	Standard Public Health/Municipal Agency
Budget Managed per Exec	~\$1 Million	\$10 Million to \$50 Million+
FTEs Managed per Exec	~4 Staff Members	40 to 100+ Staff Members
Structural Overhead	Extremely High	Balanced via broader tiers of middle-management

In a typical county public health department or mid-sized city government, a single Director or Chief-level position manages tens of millions of dollars in budgetary allocations and oversees hundreds of personnel. At BCHD, because the \$15 million gross budget is distributed across so many executive roles, the actual "yield" of public good produced per dollar spent on management is deeply diluted.

Why This Structure Persists

This ultra-low span of control persists because BCHD functions less like a traditional public health department (which handles massive regional operations like disease control, restaurant inspections, and public clinics) and more like a hybrid administrative trust. It primarily manages property, coordinates volunteers, and distributes grants.

Because the agency lacks the massive frontline labor force of a standard health department, it does not naturally scale downwards. Instead, the administrative core remains fixed and highly paid, leaving a very narrow base of actual operational staff to execute the actual community programs.

FOR PUBLIC COMMENT AT COUNCIL MEETING

Subject: Formal Notice Regarding Repeated Non-Compliance with the California Public Records Act

Copies should be given to : Each Member of the City Council, the Office of the City Attorney, City Clerk and City Manager.
City of Redondo Beach,

As a resident and taxpayer of the City of Redondo Beach, I write to formally raise serious concerns regarding what appears to be repeated failures by the City to comply with the requirements of the California Public Records Act (CPRA).

Citizens have both the right and the responsibility to ensure appropriate checks and balances within their local government. One of the most important tools available to the public to accomplish this is the ability to request and obtain records concerning the operation of the City and the expenditure of public funds through the public records laws established by the State of California.

California law is clear regarding these requirements. Under California Government Code 7922.535, a public agency must determine whether requested records will be disclosed and notify the requester of that determination **within ten (10) days of receiving a request**. While the law allows limited extensions under unusual circumstances, **California Government Code §7922.540 requires that the requester be notified of the reason for the delay and the date by which a determination is expected**.

It appears that these statutory requirements have not been followed. On numerous occasions, requests for public records have reportedly gone months without acknowledgement or response, and in some cases responses have taken up to a year or more to be provided. In many of these instances there has been no explanation, no status update, and no indication that the request is being actively processed.

Additionally, residents have frequently submitted follow-up inquiries requesting status updates on pending public records requests, yet in many cases those follow-up inquiries have also gone unanswered. When citizens are forced to repeatedly ask for updates and those inquiries are ignored, it further undermines confidence that requests are being processed in accordance with the law.

Even in instances where responses are eventually provided, the replies are often vague, indifferent, or dismissive in nature, frequently including general statements such as *“these things take time”* or similar vague language that does not provide a meaningful explanation. Such responses typically fail to provide any realistic estimated completion date, projected timeline, or structured update schedule. Without a clear timeframe or periodic update mechanism, these responses do little to satisfy the transparency requirements intended under the California Public Records Act and instead leave residents uncertain as to whether their requests are being addressed at all.

Additional concerns have arisen regarding the handling of redactions within documents that are eventually released. On several occasions, documents have been provided that were heavily redacted without a clear explanation or citation of the legal exemption supporting those redactions. Under California Government Code 7922.000, when an agency withholds or redacts records it must justify that decision by identifying the applicable statutory exemption and explaining the basis for withholding the information. In some instances where clarification has been requested regarding the legal basis for certain redactions, the same records were later provided with significantly fewer redactions or without those redactions at all, raising questions about the consistency and appropriateness of those initial redactions.

Further, there have been occasions where records specifically requested in clear and detailed terms were not provided, and instead the response contained materials that were unrelated to the request or otherwise inaccurate. When the request itself is specific and clearly defined, the provision of unrelated or erroneous materials creates the appearance that the request has been answered when, in fact, the requested records were not produced.

The practical effect of such responses is that the requester must then submit additional new requests or clarifications simply to obtain the records originally requested. When this occurs repeatedly, it creates the appearance that the response process is being used in a manner that discourages further inquiry or creates unnecessary administrative barriers for members of the public seeking information.

California law further places an affirmative obligation on public agencies to assist requesters in identifying responsive records. Under California Government Code 7922.600, agencies must make reasonable efforts to assist members of the public in

making focused and effective requests that reasonably describe identifiable records. This includes helping requesters identify records and information that are responsive to their requests and providing guidance when clarification may be needed. Responses that provide unrelated materials or that fail to assist requesters in identifying the appropriate records do not appear consistent with the spirit or intent of this statutory duty.

These do not appear to be isolated incidents. Rather, it appears to represent a clear pattern of repeated delays and failures to comply with the statutory obligations imposed by California law. The frequency of these occurrences suggests that the issue may reflect a broader administrative practice or standard operating approach within City staff, rather than a single isolated oversight.

It must therefore be asked whether the individuals responsible for administering public records requests are unable to comply with the law, unwilling to comply with the law, or potentially receiving direction not to comply with the law. Any of these possibilities raises serious concerns regarding the City's compliance with transparency requirements and its exposure to legal liability.

Under California Government Code 7923.000, any person may institute court proceedings to enforce their right to inspect or obtain public records. Furthermore, California Government Code 7923.115 requires that a court award court costs and reasonable attorney's fees to a requester who prevails in such litigation.

In practical terms, this means that repeated failures to comply with the California Public Records Act expose the City of Redondo Beach to avoidable lawsuits, embarrassment, and significant financial liability, the costs of which would ultimately be borne by the taxpayers of this City.

Equally concerning is the practical imbalance created when residents seeking basic public information are effectively placed in a position where litigation becomes the only viable means of obtaining records to which they are legally entitled. A municipal government cannot rely upon or benefit from the financial advantage created by the use of taxpayer-funded legal resources as a means of discouraging residents from exercising their statutory rights. The public should not be placed in the position of having to incur personal legal expenses simply to obtain records that the law already requires to be disclosed.

Government transparency laws exist specifically to prevent such circumstances. The City cannot shield itself behind the financial resources of the public treasury or rely

on the practical difficulty faced by individual residents in pursuing litigation. Allowing such a situation to persist creates the appearance that access to public records is being conditioned on a citizen's willingness or ability to undertake legal action. This undermines both the intent and the public policy underlying the California Public Records Act and erodes public confidence in the transparency of municipal government.

This matter therefore raises not only transparency concerns but also serious financial and legal exposure for the City.

The City Attorney has a clear professional responsibility to protect the City from unnecessary litigation and legal liability. When there is a pattern of conduct that may violate statutory obligations and could foreseeably lead to lawsuits, it is incumbent upon the City Attorney to review the matter and take appropriate action to ensure compliance with the law.

Accordingly, this correspondence should serve as formal notice to both the City Council, City Clerk, City Manager and the Office of the City Attorney that repeated delays and failures to comply with the requirements of the California Public Records Act appear to be occurring and that corrective action is necessary.

The City Council also bears a fiduciary responsibility to the taxpayers of Redondo Beach to ensure that City operations comply with the law and that public funds are not unnecessarily expended due to preventable legal violations.

In the interest of public transparency and accountability, a copy of this complaint and notice will also be made available to residents who have submitted public records requests and have not received responses, as well as to appropriate parties responsible for ensuring compliance with applicable laws governing public access to information.

It is unfortunate that the circumstances described above give the appearance that a blatant disregard for the requirements of the law may be continuing without meaningful accountability or corrective action.

For these reasons, it is respectfully requested that the City Council:

1. Initiate a review or investigation into the handling of public records requests by the City Clerk's Office.

2. Ensure that the custodians of records are complying with the timelines and requirements established under California Government Code 7922.535 and 7922.540.
3. Implement procedures requiring prompt acknowledgement of requests and periodic status updates to requesters.
4. Establish and maintain a formal tracking log documenting each request, responses provided, and reasons for any delay.
5. Establish clear accountability measures to ensure future compliance with the law.

Transparency and accountability are not optional components of government; they are fundamental obligations owed to the public.

This correspondence therefore serves as formal notice that repeated failures to comply with the requirements of the California Public Records Act cannot be ignored and must be addressed.

Respectfully,

Kevin Bolaski

Resident and Taxpayer
City of Redondo Beach

From: [Mark Nelson \(Home Gmail\)](#)
To: [CityClerk](#); cityclerk@hermosabeach.gov; cityclerk@manhattanbeach.gov; [CityClerk](#)
Subject: Letter to the Editor - Voters Rejected Paying for ALLCOVE Cost Overruns - So BCHD FORCED THEM TO PAY
Date: Friday, May 15, 2026 12:19:46 PM

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

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

From: **Mark Nelson (Home Gmail)** <menelson@gmail.com>
Date: Fri, May 15, 2026 at 12:04 PM
Subject: LTE
To: Judy Rae <easyreader@easyreadernews.com>

BCHD's PR machine has been promoting the ALLCOVE building to anyone with a pulse. The rejection of BCHD's proposed Measure BC (ERNews 11/7/2024, "Redondo Beach election results: all city measures passing, except BCHD bond") was a rejection by District taxpayers of funding for the cost overruns of the ALLCOVE building project. About one-third of the bond measure was earmarked for ALLCOVE. Voter's obviously didn't want to pay for ALLCOVE, since Measure BC's \$30M ask was the only bond measure of over \$600M to fail. So what did BCHD do next? It seized the funds from voters by taking out a loan to cover the ALLCOVE cost overruns. Taxpayer funding will be required to pay off the loan, because all BCHD funding is taxpayer funding. It's either from property taxes or rental income from taxpayer bought-and-paid-for land and buildings. Summary: Taxpayers voted NO on ALLCOVE building funding, so BCHD forced them to pay for it anyway.

Mark Nelson
Redondo

From: [Mark Nelson \(Home Gmail\)](#)
To: [CityClerk](#); cityclerk@hermosabeach.gov; cityclerk@manhattanbeach.gov; [CityClerk](#)
Subject: Letter to the Editor: BCHD is Evicting Silverado Memory Care Patients while Lying to their Families
Date: Friday, May 15, 2026 12:21:12 PM

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

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

From: **Mark Nelson (Home Gmail)** <menelson@gmail.com>
Date: Fri, May 15, 2026 at 12:17 PM
Subject: LTE
To: Judy Rae <easyreader@easyreadernews.com>

The families of Silverado memory care attended the April BCHD Board meeting to object to the eviction of their loved ones with dementia from the taxpayer-owner former hospital building. Their pleas fell on deaf ears at the Board. CEO Bakaly reported that the building did not meet seismic standards and must be demolished. That's not true. The former hospital at 514 N Prospect Ave meets every applicable seismic standard for continued operation. No, it doesn't meet 2026 seismic standards, but neither does any other building that wasn't built under the current code. The 2026 seismic standards are not applicable to the former hospital, BCHD knows it, but it tried to mislead the Silverado families. When that didn't work, Board President Diehl made the false claim that "it's the law" that the building has to be demolished, because it was a hospital. That's not true. At the next public comment period, former Redondo Beach Councilmember Horvath read the State law to the room, demonstrating that the law clearly exempts memory care and skilled nursing use from seismic retrofit requirements. Why does BCHD continue to lie to the public, and especially to the Silverado families who are being forced to relocate their loved ones? CEO Bakaly's statement that "there's 1600 available memory care beds within 60 miles" was little solace and it was a highly inappropriate, empathy-free statement in response to the shared grief at the meeting.

Mark Nelson

From: [Mark Nelson](#)
To: [CityClerk](#)
Subject: Public comment traffic running the red light to exit prospect has cut through
Date: Wednesday, May 13, 2026 1:08:26 PM
Attachments: [80482C28B2AC20260513130552_album_local_cache.MP4](#)

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

Notice the white Mercedes SUV below the red light. Toward the end of this video clip, you can clearly see that the light turns red and after it's fully red, the Mercedes comes flying off of the north prospect frontage onto big prospect. Will use different cameras and pull the license plate number from the Mercedes.

Sent from my iPhone

From: [Mark Nelson \(Home Gmail\)](#)
To: [CityClerk](#); mike.witzanzky@redondo.org; [Joy Ford](#); [Paige Kaluderovic](#); [Marc Wiener](#)
Subject: This ALLCOVE facility requires 31 on-site parking spaces. There are 8 per the plan
Date: Friday, May 15, 2026 9:53:00 PM

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

The closest offsite parking is at 514 N Prospect and it is nearly one-half mile walking from Flagler & Beryl to Beryl & Prospect to BCHD driveway to the closest non-disabled parking.

If the City has approved this, we need to have a public hearing to protect the surrounding neighborhood from having all its parking consumed. Recall that residents of Prospect and Diamond were forced by the District's poor parking behavior to institute permit parking until the early 1990s.

Construction Information

On April 16, BCHD held a community meeting regarding the upcoming construction for allcove Beach Cities and the relocation of the Center for Health & Fitness (CHF). The summary report from that meeting is available below.

Work on both locations is expected to begin this month. We encourage neighbors to sign up for our construction e-newsletter at, www.bchd.org/construction.

Here's the latest allcove Beach Cities and CHF updates.

1272 Beryl Street Lot allcove Beach Cities

- New two-story, 9,400 sq. ft., wellness center for young people ages 12-25
- Groundbreaking Ceremony: Saturday, May 16, at 10:00 a.m.
- Opening planned for spring 2027