

# **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 MARCH 5, 2024**

### **J.1 PUBLIC PARTICIPATION ON NON-AGENDA ITEMS**

- **PUBLIC COMMUNICATIONS**

**From:** [Holly Osborne](#)  
**To:** [CityClerk](#)  
**Subject:** Comments for Redondo March 5 on Non Agenda (Green Line)  
**Date:** Tuesday, March 5, 2024 1:33:26 PM

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You don't often get email from nredschoool@yahoo.com. [Learn why this is important](#)

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Good evening

This is Holly Osborne, Redondo Beach.

This is regarding the width of the narrow part of the ROW on the Green Line in Lawndale; and I have 3 points to make.

Recall: The width was 75 ft in 2018.

It mistakenly grew to 81 ft, when Metro printed their TOWN HALL charts in **August 2022**. The ROW was just barely wide enough for the at-grade option with that width. (Metro had charts for **both** the at-grade and trench options at this width.)

Metro was reminded the width was 75 ft. They changed the at-grade chart and put it in the **Jan 2023 DEIR** package. BUT THERE WAS NO CORRESPONDING CHART FOR THE TRENCH. That is because the chart would have shown the trench was not a viable option. If Metro doesn't put the diagram in the package, it cannot be criticized.

Then along came Holly Mitchell and her walk this past December. With Metro people standing at 170th street in front of easels, the trench chart suddenly appeared at the 75 ft width, and it shows clearly things WILL NOT WORK. There is only a 4 ft maintenance area for the pipes, where there needs to be 12-14 ft. **The ROW is not wide enough.** (Note: The LRT takes up more width in the trench configuration than in the at-grade configuration: 38 ft vs 31 ft *See diagram below*).

**That is point 1.**

**Here is point 2.** The **Hybrid/ROW** in this narrow section is conceptually the at-grade option, **with trenches at 170th** (and 182nd) But, the trench part of the Hybrid option is basically the same as the trench part for the "full trench option." If the configuration does not fit for full trench at 170th **it does not fit for the Hybrid/ROW trench at 170th either.**

Metro has said they did not "anticipate" condemning properties. These pictures seem to contradict their words.

**Here is point 3.** There is an Appendix document with **detailed drawings for the at-**

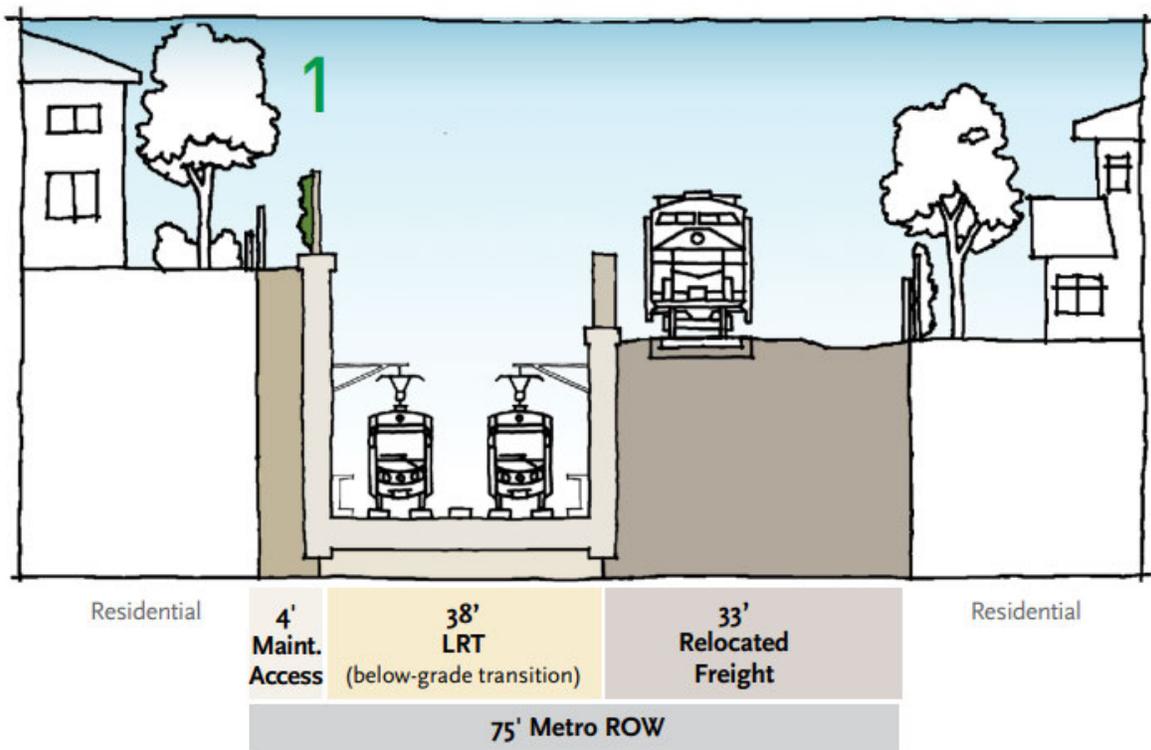
**grade option** between 170th and Artesia, **BUT NOT FOR THE TRENCH OPTION.** It is apparent that when Metro put out the DEIR, they had no idea how the trench option would work in that area. Further, the ROW takes a sudden jagged increase, and lo and behold the ROW is increased to 80-81 ft. There is so much illogical work in the Appendix on this part of the diagram, that none of it can be believed.

Thank you

Below is sketch from Dec. 16 . 2023 Metro Walk, between 170th and Artesia:

## Trench

> Looking south: Light rail crosses under 170th St then transitions to come at-grade to cross over Artesia Bl bridge



4' wide Maintenance area is not sufficient.

**From:** [Mark Nelson \(Home Gmail\)](#)  
**To:** [Communications; CityClerk; cityclerk@manhattanbeach.gov; cityclerk@hermosabeach.gov; executiveoffice@bos.lacounty.gov; info](#)  
**Subject:** BCHD's CEO Red Herring on Providing Services to Non-Residents  
**Date:** Tuesday, February 20, 2024 7:38:07 PM

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Public Comment - City Councils of Hermosa, Manhattan and Redondo Beach:

**At the end of this is the AI generated transcript segment of the BCHD CEO making unfounded and unsupported claims.**

**BCHD IS FULLY WITHIN TAXPAYER RIGHTS TO LIMIT SERVICE**

1) LALAFCO clearly stated that BCHD was fully within its right and the rights of the taxpayers to use a residency test for services. The transcript of that authority was captured by LALAFCO and provided to the public.

**BCHD (OPTIONAL AGENCY) HAS NO ANALOGY TO FIRE OR POLICE SERVICES (MANDATORY AGENCY)**

2) Mandatory Fire and Police services bear no relationship to Optional Health District services. The majority of LA County (95% by population) has no health district coverage. Only those areas that **LOCALLY FORMED, LOCALLY FUNDED, and LOCALLY CONTINUE TO PROVIDE TAXES** have Health Districts. Therefore, a mandatory service such as Police and Fire has **NO ANALOGY** to a health district.

**BCHD'S FLAWED ANALOGY WOULD RESULT IN NO NON-RESIDENT SERVICES BY PD OR FD FOR OPTIONAL SERVICES**

3) The closest, yet flawed analogy for a health district and Police Department would be for a non-resident to report a crime from another City to the Redondo Beach PD. In that case, the RBPD would **NOT** take the report and would instead return the non-resident to his/her proper jurisdiction.

4) The closest, yet flawed analysis for a health district and Fire Department would be for a non-resident to call the Rbfd and report a fire in a non-resident city and request service. Again, that would not occur and the non-resident would be redirected to his/her local jurisdiction.

**BCHD HAS NO ANALYSIS OR DATA**

BCHD has repeated stated that analysis of program public benefits is beyond BCHD's limited capabilities (per CPRA response). As a result, BCHD is incapable by their own admission in stating that providing allcove to 1.4M population service area (SPA8) has a net benefit to the District residents.

**BCHD must required to use facts and stop misleading the public.**

**From:** Mark Nelson (Home Gmail)  
**To:** PRR; Communications  
**Cc:** executiveoffice@bos.lacounty.gov; Holly J. Mitchell; senator.allen@senate.ca.gov; Al.Muratsuchi@asm.ca.gov; CityClerk; cityclerk@manhattanbeach.gov; cityclerk@hermosabeach.gov  
**Subject:** Re: CPRA - Gallup Survey  
**Date:** Wednesday, February 21, 2024 9:24:12 PM  
**Attachments:** image001.png

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Thank you for acknowledging that BCHD has no additional materials that might demonstrate the Gallup Survey's ability to measure causality. As such, the Gallup survey makes no findings regarding Blue Zones causality nor BCHD program causality.

cc: Public Comment, Hermosa, Redondo, Manhattan City Councils as owners of the District

On Wed, Feb 21, 2024 at 7:55 PM PRR <PRR@bchd.org> wrote:

Dear Mr. Nelson,

Please see below (in red) for the District's response to your public records request originally received 2/8/24 that reads:

CPRA Requests:

1. For the Gallup survey at [https://bchd.granicus.com/DocumentViewer.php?file=bchd\\_42cf4ed233a536488505da468677bb2c.pdf&view=1](https://bchd.granicus.com/DocumentViewer.php?file=bchd_42cf4ed233a536488505da468677bb2c.pdf&view=1), provide all documents demonstrating that the Blue Zones Project is causal to the differential in scores presented by Gallup for the District cities vs the US.
2. For the Gallup survey at [https://bchd.granicus.com/DocumentViewer.php?file=bchd\\_42cf4ed233a536488505da468677bb2c.pdf&view=1](https://bchd.granicus.com/DocumentViewer.php?file=bchd_42cf4ed233a536488505da468677bb2c.pdf&view=1), provide all documents demonstrating that the Blue Zones Project is causal to the differential in scores across time presented by Gallup for the District cities..
3. For the Gallup survey at [https://bchd.granicus.com/DocumentViewer.php?file=bchd\\_42cf4ed233a536488505da468677bb2c.pdf&view=1](https://bchd.granicus.com/DocumentViewer.php?file=bchd_42cf4ed233a536488505da468677bb2c.pdf&view=1), provide all documents demonstrating the differences in results of the District cities vs. the US are significant after controlling the CDC racial factors in the link presented, such as income, education level, household asset value, race, age, and other CDC identified factors.

The Gallup Well-Being Index Results presented by Dan Witters, Gallup Research Director, and the link to the Board Study Session are available below. There are no other responsive documents.

Gallup Slides: [BCHD BOD Study Session - Gallup Presentation January 24, 2024](#)

Link: [January 24, 2024 Study Session Video](#)

If you believe we have not correctly interpreted your request, please resubmit your request with a description of the identifiable record or records that you are seeking.

Please note that if records you are seeking do not exist, BCHD has no obligation to create new records, or to obtain records from other sources, unless those sources are considered "prepared, owned, used by, or retained by" by the District.

Please note that the District may not respond to questions or comments included with your request that are not themselves requests for identifiable public records under the California Public Records Act. The lack of response by the District to any such questions or comments, including follow-up questions and comments, is not an indication of the District's position on any topic or item, and should not be presented as such to any person.

Thank you.

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**From:** Mark Nelson (Home Gmail) <[REDACTED]>  
**Sent:** Thursday, February 8, 2024 2:45 AM  
**To:** PRR <PRR@bchd.org>  
**Cc:** info <info@lalafco.org>; executiveoffice@bos.lacounty.gov; Garth Meyer <gmeyer@easyreadernews.com>; lliu@scng.com; Vanessa I. Poster <Vanessa.Poster@bchd.org>; Noel Chun <Noel.Chun@bchd.org>; Michelle Bholat <Michelle.Bholat@bchd.org>; Jane Diehl <Jane.Diehl@bchd.org>; Martha Koo <Martha.Koo@bchd.org>  
**Subject:** CPRA - Gallup Survey

EXTERNAL EMAIL - CAUTION

**PUBLIC COMMENT ALL AGENCIES**

**PUBLIC COMMENT BCHD HALF DAY STRATEGIC PLANNING MEETING 2/16/24**

**BACKGROUND**

The characteristics of the District cities are substantially different from the US as a whole, and no demonstration of controls for those differences is presented by Gallup. Per the US CDC, the social determinants of health, such as income and race demonstrate substantially worse health outcomes, morbidity and mortality for non-whites, less educated, and those of lower income. As such, CDC finds that these variables must be considered (controlled for) for valid comparisons across locations.

Gallup, BCHD, and Blue Zones comparison of data average from the District cities to the US Average must be controlled for these CDC identified factors to make valid comparisons. See <https://www.cdc.gov/minorityhealth/racism-disparities/index.html>

For example, US Census data for the US vs Manhattan Beach are available at <https://www.census.gov/quickfacts/fact/table/US.manhattanbeachcitycalifornia/PST045222>

Summary results are as follows:

<b>Social, Racial, and Income Conclusions from Census Comparison of MB to US</b>	<b>Census Factor</b>	<b>United States</b>	<b>Man Beach</b>	<b>US to MB</b>	<b>Notes</b>
<b>FEWER MINORITIES</b> - On average, the US is 34-times "Blacker" than Manhattan Beach.	Black	13.6%	0.4%	3400%	The US is 3400% more Black than Manhattan Beach
<b>BETTER EDUCATED</b> - On average, about 2.5-times more Manhattan Beach residents earned BS or better degrees compared to the US	BS or Higher	34.3%	78.2%	44%	Approximately 2.2X more Manhattan Beach residents have BS degrees or better than the US average
<b>FEWER DISABLED</b> - Manhattan Beach has less than half the disability rate of the US.	Disabled	8.9%	4.0%	223%	The US average for disabilities is over twice that of Manhattan Beach
<b>HIGHER INCOME</b> - Manhattan Beach income is over 2.5-times the US average	HH Income	\$ 75,149.00	\$ 187,217.00	40%	Manhattan Beach income is 2.5-times that of the US average
<b>FEWER MINORITIES</b> - On average, the US is 2.4-times more Hispanic than Manhattan Beach.	Hispanic	19.1%	8.0%	239%	The US has over twice as many Hispanic households on average than Manhattan Beach
<b>HIGHER HH HOME ASSET VALUE</b> - Manhattan Beach housing asset value is 7-times more than the US average	Housing Value	\$ 281,900.00	\$ 2,000,000.00	14%	Manhattan Beach housing asset value is greater than 7X that of the US average
<b>GREATER HEALTH INSURANCE COVERAGE</b> - Over 5-times more people in the US have no health coverage than in Manhattan Beach on average	No Health Insurance	9.3%	1.7%	547%	Nearly 550% more households in the US have no health insurance on average than Manhattan Beach
<b>LESS POVERTY</b> - The US poverty rate is over 3.5-time greater than Manhattan Beach	Poverty	11.5%	3.2%	359%	Poverty in the US is 3.5-times higher than in Manhattan Beach

**CPRA Requests:**

1) For the Gallup survey at [https://bchd.granicus.com/DocumentViewer.php?file=bchd\\_42cf4ed233a536488505da468677bb2c.pdf&view=1](https://bchd.granicus.com/DocumentViewer.php?file=bchd_42cf4ed233a536488505da468677bb2c.pdf&view=1), provide all documents demonstrating that the Blue Zones Project is causal to the differential in scores presented by Gallup for the District cities vs the US.

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3) For the Gallup survey at [https://bchd.granicus.com/DocumentViewer.php?file=bchd\\_42cf4ed233a536488505da468677bb2c.pdf&view=1](https://bchd.granicus.com/DocumentViewer.php?file=bchd_42cf4ed233a536488505da468677bb2c.pdf&view=1),

provide all documents demonstrating the differences in results of the District cities vs. the US are significant after controlling the CDC racial factors in the link presented, such as income, education level, household asset value, race, age, and other CDC identified factors.

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**From:** [Mark Nelson \(Home Gmail\)](#)  
**To:** [Communications](#); [CityClerk](#); [cityclerk@manhattanbeach.gov](mailto:cityclerk@manhattanbeach.gov); [cityclerk@hermosabeach.gov](mailto:cityclerk@hermosabeach.gov); [Vanessa I. Poster](#); [Jane Diehl](#); [Noel Chun](#); [Michelle Bholat](#); [Martha Koo](#)  
**Subject:** BCHD "Packs" the Strategic Half Day Meetings with PAID EMPLOYEES/CONSULTANTS/CONTRACTORS/VENDORS  
**Date:** Thursday, February 22, 2024 6:18:36 PM

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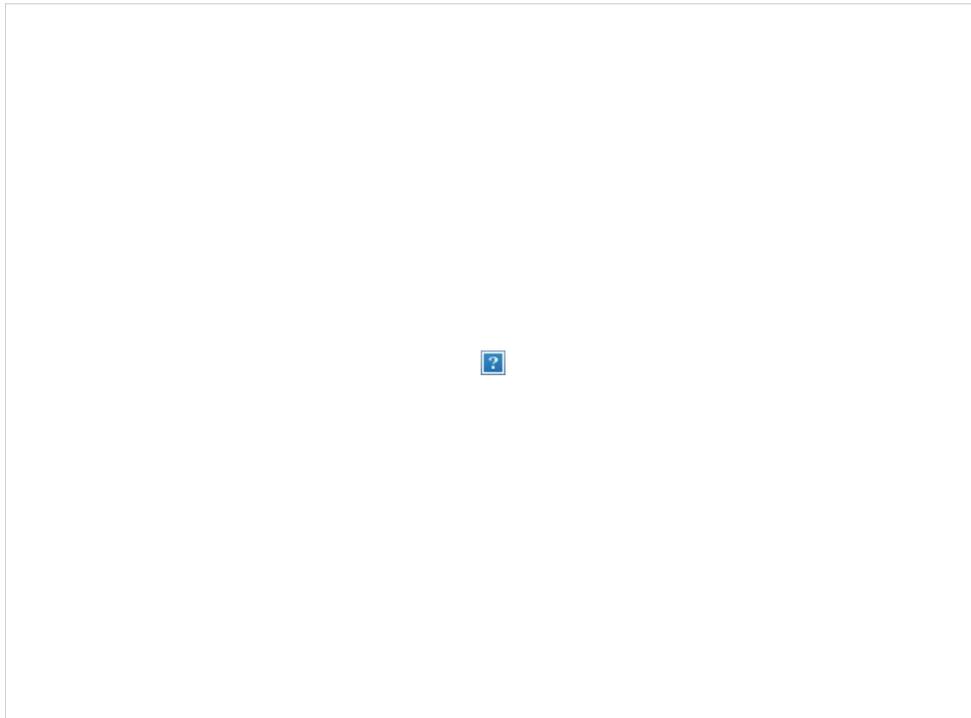
Public Comment - District Cities of Manhattan/Hermosa/Redondo Beach City Councils

## **BCHD Pays Two-Thirds of Attendees at its Half Day Meetings who Attend! That's PACKING THE MEETING!**

**From the prior Strategic Half Day we see from the Roster that 41% of attendees were paid staff, 25% of attendees were paid contractors/consultants/vendors, and 5% were the Board itself. So 71% of the attendees were either PAID AS BCHD EMPLOYEES or PAID CONSULTANTS/ CONTRACTORS/VENDORS or THE BOARD ITSELF.**

**ONLY 6% WERE UNAFFILIATED WITH BCHD!**

**BCHD deliberately STACKS THE DECK against the PUBLIC!**



<https://www.stopbchd.com/post/bchd-pays-two-thirds-of-attendees-at-its-half-day-meetings-who-attend-that-s-packing-the-meeting>

**From:** [Mark Nelson \(Home Gmail\)](#)  
**To:** [CityClerk; cityclerk@manhattanbeach.gov; cityclerk@hermosabeach.gov](#)  
**Cc:** [Communications; executiveoffice@bos.lacounty.gov; Holly J. Mitchell; Lisa Jacobs; Garth Meyer; Vanessa I. Poster; Noel Chun; Martha Koo; Jane Diehl; Michelle Bholat](#)  
**Subject:** BCHD Fails to Disclose that Gallup Survey does not Measure BCHD Activities or Programs  
**Date:** Thursday, February 22, 2024 7:32:49 PM

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Public Comment: Hermosa/Manhattan/Redondo Beach City Councils

BCHD recently sent out a **misleading advertising email** with the headline "**Beach Cities Scores High** on the 2023 Well-Being Index". BCHD's headline is deliberately using the "**Beach Cities Scores**" to imply that the survey was regarding BCHD. **It was NOT.**

The survey is regarding the three beach cities of Hermosa/Manhattan/Redondo Beach. Had BCHD not intended to misrepresent the survey, the correct headline would have been "Beach Cities Score High" - correctly reflecting the three beach cities. And we know BCHD action to be deliberate, as BCHD in the following link changes its language to TRUTHFULLY STATE "**WELL-BEING REMAINS HIGH IN THE BEACH CITIES.**"

Further, under public questioning, **Gallup was quick to admit that the survey does not evaluate any programs** and a BCHD meeting transcript reflects Dr. Witter on the record affirming that no evaluation occurred relating to BCHD.

**BCHD is engaging in a misinformation program regarding the GALLUP survey.**





**From:** [Mark Nelson \(Home Gmail\)](#)  
**To:** [CityClerk](#); [Zein Obagi](#); [Nils Nehrenheim](#); [Todd Loewenstein](#); [Paige Kaluderovic](#); [Scott Behrendt](#); [James Light](#); [Mike Witzansky](#); [Holly J. Mitchell](#)  
**Cc:** [RightOfSay/RBOol](#)  
**Subject:** Public Comment - Failing Jet Fuel Pipeline in RR ROW in Redondo Beach  
**Date:** Wednesday, February 28, 2024 1:40:10 PM  
**Attachments:** [Torrance Pipeline WORK PLAN MTA v2.pdf](#)

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Dear Mayor and Council:

First off, my condolences and sympathies to all over the loss of Bill Brand. I met Bill during the Heartburn of the City process. He was a truly special man that will be missed by all who knew him.

Secondly, congratulations to newly appointed Mayor Light. I believe the Council has done itself and the residents proud. I wish the new Mayor much success and longevity in the role.

Now to the topic of pipeline failure in the RR ROW. After 5 months, Metro has finally responded to a Public Records Request from October 2023 regarding the pipeline anomaly in the right of way. I was truly concerned to find that the "anomaly" was actually a compromised section of the jet fuel pipeline that runs under it. I've attached a work order for excavation, examination and repair that Metro provided.

I urge the City to take a long, hard look at the risks of adding 2 more 24/7/365 rail lines in a right-of-way through Redondo Beach residential areas that contains an active jet fuel pipeline. As a retired utility executive with experience in oil and gas, I believe that aging/failing pipelines in corrosive soil in high seismic areas should not be disturbed by additional 24/7 rail in an abundance of caution for the safety of the community.

Mark Nelson  
Retired VP MVL LLC and Director of Planning  
SCE and Mountainview Power LLC (an SCE company)

# WORK OVERVIEW

SEND TO PCC 48 HOURS PRIOR TO WORK - FIRST 2 PAGES ONLY  
 (VIA E-MAIL: [PipeLineControl1@pbfenergy.com](mailto:PipeLineControl1@pbfenergy.com) (PREFERRED) OR FAX (346) 814-6464)

## SECTION I - PCC NOTIFICATION

DESCRIPTION OF WORK	
<b>Title:</b>	M-141 Integrity Inspection & Repair
<b>Description of Work:</b>	<ul style="list-style-type: none"> <li>Locate, excavate &amp; expose pipeline, remove coating, power brush &amp; visually inspect; abrasive blast pipeline, complete pipeline inspection, report findings, perform repair, coat, backfill</li> <li>TLC to install a fence to delineate the Work Area from the property owner and secure site.</li> <li>TLC will be removing the fence/wall that is encroaching on MTA property that is in conflict with the proposed excavation. TLC will be submitting a dig alert ticket for this scope as it may include removal of trees, wall footing, and earth movement.</li> <li>Restoration of fence/wall and paving of excavation to be completed by TLC. (additional discussions with MTA to follow concerning MTA's acknowledgement of restoration plans including reimbursement costs)</li> </ul>
<b>NON-HRO Procedure – First Line Supervisor Approval</b>	
Start Date:	10/30/2023      Time: 7 AM      End Date: 11/13/2023      Time: 5 PM

**NOTE:** If work is going to exceed the above end date and time, notify PCC and the appropriate supervisor as soon as possible.

GENERAL INFORMATION	
System / Facility Name:	M-141 MTA Right of Way N. of Artesia Blvd      Product: Jet Fuel
Dig Location:	~91+28 to ~91+38 (5'W x 10'L x 7'D) 33.8745687      -118.3587322

Name	Company	Title	Cellular
Jesse Lopez	Torrance Logistics Co	Inspector	(909) 702-8917
Richard Montejano	Torrance Logistics Co	Operations Supervisor	(310) 347-2203
Rachel Brossman	Torrance Logistics Co	Integrity Engineer Sup	(562) 241-9981
Joe Acuna	Torrance Logistics Co	Construction Supervisor	(310) 755-8156

EMERGENCY PHONE NUMBERS (IF OTHER THAN 911)				
Fire	Police	Sheriff	Hospital/Medical Emergency	Other
N/A	N/A	N/A	N/A	N/A

SPECIAL CONSIDERATIONS / COMMENTS
<ul style="list-style-type: none"> <li>When working in Railroad ROW (within 25' from rail), Flagman required. Training thru BSNF certificate also required.</li> <li>No abrasive blasting may take place if scale on the pipe is found &amp; wall thickness cannot be confirmed.</li> <li>Confirm remaining wall thickness is at or above 90% nominal at weld ends of full encirclement Type B sleeve. UT scan by certified NDT Technician. If below 90% wall thickness consult engineering and review NDT report to confirm landing strips for the full encirclement.</li> <li>Pipeline with 90% or more wall loss – An HRO procedure must be routed for review &amp; Area Manager Approval, before for abrasive blasting.</li> <li>Type of expected repairs:                             <ul style="list-style-type: none"> <li>Included in this procedure:                                     <ul style="list-style-type: none"> <li>✓ Type A/B Welded Sleeve</li> </ul> </li> </ul> </li> <li>Confirm clamp the size of the pipeline, ½ round bbl. on site before commencing any pipeline cleaning: Wire brushing or abrasive blasting.</li> <li>Consult Engineer for maximum flow rate while welding. Maximum flow rate while Welding per Engineer: _____</li> <li>The work site will need to be kept delineated, in order, and clean.</li> <li>Work site will require 24/7 security provided by TLC</li> </ul>

# WORK OVERVIEW

SEND TO PCC 48 HOURS PRIOR TO WORK - FIRST 2 PAGES ONLY

(VIA E-MAIL: [PipeLineControl1@pbenergy.com](mailto:PipeLineControl1@pbenergy.com) (PREFERRED) OR FAX (346) 814-6464)

Submitted by: TLC	Date: 10/24/23
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CONFIDENTIAL

## WORK OVERVIEW

SEND TO PCC 48 HOURS PRIOR TO WORK - FIRST 2 PAGES ONLY  
 (VIA E-MAIL: [PipeLineControl1@pbfenergy.com](mailto:PipeLineControl1@pbfenergy.com) (PREFERRED) OR FAX (346) 814-6464)

## SECTION II - WORK PROCEDURES

### 1.0 Scope

#### 1.1 Description of Work

Excavate, expose pipeline, wire brush, inspect pipe by Qualified NDE Contractor if dealing with internal or external corrosion otherwise inspector will visually inspect pipeline. Abrasive blast, inspection to take place by Qualified NDE Contractor, perform type A/B Sleeve, re-coat, slurry back fill.

#### 1.2 Schedule and Timing of Work: Start date: 10/30/2023; End date: 11/13/2023 Work Hours: 7 AM – 5 PM, 7 days/week

### 2.0 Permitting and Notification Requirements

#### 2.1 Internal

- A. Torrance Logistics Management Review and Approval – FLS Level
- B. Work Permit, Procedures, Checklist's and JSA's
- C. Pipeline Control Center (PCC)
- D. ROW
- E. Torrance Meters Operations
- F. Commercial

#### 2.2 External

- A. One Call / USA
- B. MTA
- C. BNSF (track control/flagging), if required

### 3.0 Environmental

**Contaminated Soil** - SCAQMD Rule 1166 testing will apply while digging.

Any contaminated soil (VOC reading above 50ppm) identified during the excavation will be placed in 20yrd bins & sent to Vernon Meters Warehouse (Temp Storage), a sample will be taken, analyzed & a profile issued for future disposal to an approved disposal site.

**Asbestos Coating** – SCAQMD Procedure 3 or Procedure 5 to be used. Treat all coating as asbestos containing material unless we are positive it does not contain asbestos or has been tested by a lab and comes back with less than 1% Asbestos content. Asbestos to be removed by approved Contractor always.

Procedure 3 can be utilized if once pipeline has been exposed and certified Asbestos Consultant has deemed that coating is undisturbed. Once Asbestos Consultant has deemed that coating is undisturbed and is less than 100sq ft, a 24 hour notification will be made to OSHA.

Procedure 5 will be utilized when removing more than 100 sq. ft. of coating or coating has been damaged or disturbed, in this case, it will require a 10 day notification.

### 4.0 Safety

#### 4.1 Hazard Analysis & Preventive Measures

- **Traffic (city streets)** – Follow traffic control plans & watch book if applicable.
- **Pipeline Leak** – Lay down excavation with visqueen type plastic (Min. 3 Mil) and prepare

## WORK OVERVIEW

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(VIA E-MAIL: [PipeLineControl1@pbfenergy.com](mailto:PipeLineControl1@pbfenergy.com) (PREFERRED) OR FAX (346) 814-6464)

- with a clamp the size of the pipeline, wooden plugs & PPE for responding to a potential leak. Evaluate the need to have the line down & isolated before wire brushing or abrasive blasting.
- **Railroad ROW** - Have flag man present during all work, if required
- **Contaminated soil** – If found, will be handled by an approved Contractor.
- **Slips, Trips, Falls & Pinch points** – Look for tripping hazards & possible pinch points before starting the job. Maintain clean area; Identify staging areas for Tools and Equipment
- **Public Safety** – Delineate work area & place fencing around or plates over the excavation when workday is completed.
- **Underground utilities and other pipelines** – Follow One Call procedures, ensure USA ticket is clear before starting, use probing techniques.
- **Hot Work:** Hot Work Permit required.
- **Confined Space:** Follow confined space entry HRO procedure & work permit requirements.
- **Hazardous atmosphere:** Comply with work permit requirements, ensure gas testing procedures are in place, follow JSA.
- **Manganese:** Wear Proper Level of Protection. When welding in a confined space, this will require either an FF Respirator or PAPR with Mechanical Dilution Ventilation.
- **Pipeline wall thickness:** Confirm sufficient wall thickness & no lamination at weld location by UT scan.
- **Pipeline Overheating/Burn through: caused by loss of flow, no flow:** Test and maintain reliable communication between PCC, and the weld site. Stop work immediately if no flow is reported while welding circumferential ends of Type B sleeve. PCC to notify the Inspector immediately if no flow is observed.

### 5.1 Product Description and SDS

- Jet Fuel. Product SDS will be available on site.

### 6.1 Critical Operating/Control Parameters

- Confirm visqueen has been laid down in the excavation, half round bbl., clamps the size of the line & PPE (rubber boots, full face respirator, FRC & rubber / nitrile gloves) to handle a leak.
- Work scope & procedures – All working crew needs to understand the work scope & the work planned for the day.
- JSA's must be reviewed in the morning, after each break & during the day as needed.
- Gas Testing must comply with Work Permit Requirements
- Scaling on pipeline, ensure all pipe is visually inspected by the Inspector, report any scale on the pipe to the FLS.
- Hand clean and power brush pipeline first. Inspector must visually inspect the pipeline before abrasive blasting.
- Identify upstream & downstream block valves to isolate line segment if needed.
- Ensure pipeline flow during welding of circumferential ends of Type B sleeve.
- PCC to notify the Primary Contact immediately if the product flow is stopped for any reason.
- Fire Watch, follow hot work permit requirements.
- Non-Hazardous Confined Space entry program.
- Visually inspect, UT scan pipeline to locate safe weld location (Not less than 90% wall).

## WORK OVERVIEW

SEND TO PCC 48 HOURS PRIOR TO WORK - FIRST 2 PAGES ONLY

(VIA E-MAIL: [PipeLineControl1@pbfenergy.com](mailto:PipeLineControl1@pbfenergy.com) (PREFERRED) OR FAX (346) 814-6464)

### 7.1 Special Equipment, Tools Required

- Backhoe / Dump Trucks or Bins
- Air Compressor / Generator
- Vacuum Truck – as needed
- Abrasive blasting equipment
- Hand tools
- 4 Gas monitors
- Backhoe
- Light tower (if needed)
- Welding Equipment
- Pipe Inspection Equipment – NDT Contractor
- Pipeline Clamp
- Blower, air compressor
- Tool truck
- Fire Retardant Clothing PPE
- Rod Scale (When Welding In Regulated Facility)

### 8.1 Detailed Work Procedures

**NOTE**

Items in these procedures that have a  in front of them require an action and **must** be checked **and** initialed by the person performing the task.

If multipliable JSAs are needed to cover several tasks during this project, a step needs to be included with a  \_\_\_\_\_ in the procedures to stop and review the JSA prior to performing that task.

### Preliminary Work

- \_\_\_\_\_ Review work scope with project lead and make necessary preparations i.e. special ops procedures, tools, supplies and manpower. Coordinate with waste management for all waste handling.
- \_\_\_\_\_ Perform a pre-job inspection at the site at least 48 hours in advance and with contractor Supervisor. Confirm with Contractor that USA/One-Call ticket has been cleared. Contact any City Inspector or Agency to notify of Start. Some Agencies require a 10 day notice prior to starting.
- \_\_\_\_\_ Install no parking signs in 172<sup>nd</sup> St. cul-de-sac to ensure access and enable parking of work vehicles.
- \_\_\_\_\_ Inspector & Contractor Supervisor to review procedures & JSAs at least 24 hrs before job start.
- \_\_\_\_\_ Review working crew OQs & Contractor(s) in ISNetwork.
- \_\_\_\_\_ Confirm with the Contractor the preparation for any possible leak: Clamp the size of the pipeline, Wooden Plugs, Type B Sleeve, half round bbl, plastic, cleanup material & PPE.
- \_\_\_\_\_ Review Contractor’s D&A DOT & Non DOT

## Work Steps

<b>Excavate &amp; expose pipeline from Rail Road ROW.</b>	
1.	<input type="checkbox"/> Review One Call and line markings, confirm with Contractor that USA ticket has been cleared line by

## WORK OVERVIEW

SEND TO PCC 48 HOURS PRIOR TO WORK - FIRST 2 PAGES ONLY

(VIA E-MAIL: [PipeLineControl1@pbfenergy.com](mailto:PipeLineControl1@pbfenergy.com) (PREFERRED) OR FAX (346) 814-6464)

	<input type="checkbox"/> Install fencing to delineate the work area and has removed approx. 55ft of fencing in conflict with the work area prior to moving on site.
2.	<input type="checkbox"/> Review procedures, work steps, and JSA's with contractor
3.	<input type="checkbox"/> Confirm clamp the size of the pipeline & wooden plugs are available on site.
4.	<input type="checkbox"/> Issue Cold / Hot work permit & Non-Haz Confined Space work permit if applicable
5.	<input type="checkbox"/> Set up Traffic Control according to Traffic Control Plans or Watch book, if required.
6.	<input type="checkbox"/> Delineate / barricade work area in highly visible manner
7.	<input type="checkbox"/> Inspect tools & equipment to be used in work process
8.	<input type="checkbox"/> Notify PCC prior to beginning.
9.	<input type="checkbox"/> Develop safe access for equipment to enter/exit work site. Remove any trees/ vegetation if conflict with the work zone.
10.	<input type="checkbox"/> Review safe excavation checklist and start Excavation
11.	<input type="checkbox"/> Use saw cutter and small track excavator to demo any asphalt or concrete in conflict with work activities.
12.	<input type="checkbox"/> Use excavator to excavate soil to expose the pipeline as needed to find the anomaly on the pipeline.
13.	<input type="checkbox"/> Use backhoe to shuttle dirt from excavation and load into a dump truck for disposal off site.
14.	<input type="checkbox"/> Probe as you go and check for sub-structures at least 6" across (no further than smallest known substructure) and 30" deep. If probing is not possible re-evaluate your excavation technique. (Hand dig, jack hammer, clay spade or vacuum excavation)
15.	<input type="checkbox"/> Once excavation becomes a non-permit confined space. <b>Stop</b> , issue for non-permit confined space entry (one time only), review confined space entry permit and JSA. Set up continuous gas monitoring.
16.	<input type="checkbox"/> Provide, install, and maintain shoring as needed for excavation per OSHA regulations. Expected pipeline depth is 6'-8'
17.	<input type="checkbox"/> Once the excavation reaches 6', install guard rails around the excavation( Or Bench Excavation) to comply with OSHA regulations
18.	<input type="checkbox"/> Excavate to within 18" of any pipeline and continue to expose the pipe by hand digging. Continue to expose our pipeline in preparation for inspection.
19.	<input type="checkbox"/> By the end of day, secure the worksite for public safety and pipeline protection. <ul style="list-style-type: none"> <li>• Install Plates over Excavation and Weld / Pin or Inset when required</li> <li>• Fence off access to the work area</li> </ul>
<b>Following Days – Pipeline Inspection &amp; Abrasive blasting</b>	
20.	<input type="checkbox"/> Repeat steps 2 through 8 on each subsequent day
21.	<input type="checkbox"/> Inspect trench and all shoring
22.	<input type="checkbox"/> Make confined space entry (Review Confined Space Permit & procedure HRO, gas test prior to entry.)
23.	<input type="checkbox"/> Confirm the following is on site: Clamp the size of the pipeline, Type B Sleeve, half round bbl., visqueen type plastic (Min. 3 Mil), cleanup material & PPE

## WORK OVERVIEW

SEND TO PCC 48 HOURS PRIOR TO WORK - FIRST 2 PAGES ONLY

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24.	<input type="checkbox"/> Confirm that pipe is the correct pipe by checking: <input type="checkbox"/> Wall Thickness <input type="checkbox"/> Drawing Location <input type="checkbox"/> Type of Coating <input type="checkbox"/> Pipe Size  *Note – If un-able to determine, contact Corrosion Technician. Have CP Tech put interrupter on the line and test CP at excavation.
25.	Determine coating type and remove it with qualified personnel.
26.	Remove casing if needed to expose the pipe where the anomaly is located using ripping gun.
27.	Inspector to inspect pipe visually and physically for anomaly and any heavy scaling. Use of UT scan & pit gauge where possible for confirmation. Use Qualified NDE Contractor for any External or Internal Metal Loss before Sand Blasting. If scale is present on the pipeline that prevents any physical inspection, the FLS needs to be notified.
28.	Confirm existence of anomaly at the dig site before proceeding. Cross check stationing with ILI odometer readings & measure distance from closest girth weld to ensure dig location accuracy
29.	Confirm clamp the size of the pipeline, Type B Sleeve, half round bbl., plastic, cleanup material & PPE are onsite. Notify operations Supervisor of line condition before proceeding. Evaluate the need for shutting down & isolating the pipeline, discuss with FLS to determine if needed.
30.	Power brush and chip any rust, corrosion and scaling until line is clean. If pitting is determined to reach 75% and not yet clean, stop and notify FLS for further evaluation.
31.	Visually Inspect pipeline for anomaly and pitting using pit gauge & UT scan. If pitting is found to be over 50% of wall loss, notify supervisor an engineer for further instructions. No abrasive blasting may take place until Special Ops Procedures level II are developed & approved
32.	Abrasive blast pipeline segment only if pipeline area to be blasted can be confirmed with 50% or more wall thickness & that it has been visually inspected & confirmed good by the Inspector or Qualified NDE Contractor if Internal or External Metal Loss. If pipeline presents scale or wall thickness cannot be confirmed on any spot, no abrasive blasting can be performed.
33.	Confirm UT scan & pit gauge have been performed by a Qualified NDE Technician and has been confirmed by the Inspector. NDE Contractor should reference engineering dig guidance for all integrity related inspections provided by TLC Engineer.
34.	Conduct inspection of the anomaly in consultation with the Project Lead & determine repair method. *NDE Tech must not leave the site until engineer has received all information needed to make the repair call.
<b>Pipeline Repair &amp; backfill</b>	
35.	Utilize appropriate repair procedure to complete repairs Perform Non-HRO Repair: ✓ Type A/B Sleeve / Re-Coat Pipeline
36.	Verify with engineer what type of marker should be used to identify the repair, this could be Marker Bands cut from Full Encirclement sleeve, or welding triangle to the pipeline. Markers must be at the extents of the new coating.
37.	Re-attach test lead wires (if applicable). Make sure that test leads are in the brooks vaults and not buried.
38.	In consultation with Corrosion control tech Re-Coat the pipeline. (Verify coating is rated for pipeline temperatures)
39.	Let coating fully cure, Once coating is dry, Jeep piping and make any necessary repairs.
40.	Backfill, compact all areas excavated and pave.
41.	Complete post work documentation

## WORK OVERVIEW

SEND TO PCC 48 HOURS PRIOR TO WORK - FIRST 2 PAGES ONLY

(VIA E-MAIL: [PipeLineControl1@pbfenergy.com](mailto:PipeLineControl1@pbfenergy.com) (PREFERRED) OR FAX (346) 814-6464)

42. Notify PCC, Torrance Meters Ops when done for day or at the completion of the job.

### 9.0 Post Job Documentation

(These are examples of possible documentation needed to complete the job. It is not all-inclusive)

PL-2200 Work Permit

PL-751 Repair Form

PL-2502 Depth of Cover

PL-733 (if pipeline crossing identified)

NDE contractor inspection report (NDE)

Revise and Re-approve Procedures (as needed)

CONFIDENTIAL

Neighborhood Character  
Impacts of BCHD 103-foot tall,  
800,000 sqft Development

# From 501 N Prospect

4-story, 65-foot tall Health Club Pavilion (L)

10-1/2 Story Parking Ramp (R)



# From 511 N Prospect

4-story, 65-foot tall Health Club Pavilion (L)

10-1/2 Story Parking Ramp (R)



# From 521 N Prospect

6-story, 103-foot , \$12,000+/month Assisted Living (L)

4-story, 65-foot tall Health Club Pavilion (C)

10-1/2 Story Parking Ramp (R)



# From 601 N Prospect

6-story, 103-foot , \$12,000+/month Assisted Living (L)

4-story, 65-foot tall Health Club Pavilion (C)

10-1/2 Story Parking Ramp (R)



# From 611 N Prospect

6-story, 103-foot , \$12,000+/month Assisted Living (L)

4-story, 65-foot tall Health Club Pavilion (C)

10-1/2 Story Parking Ramp (R)



## From 621 N Prospect

6-story, 103-foot , \$12,000+/month Assisted Living (L)

4-story, 65-foot tall Health Club Pavilion (C)

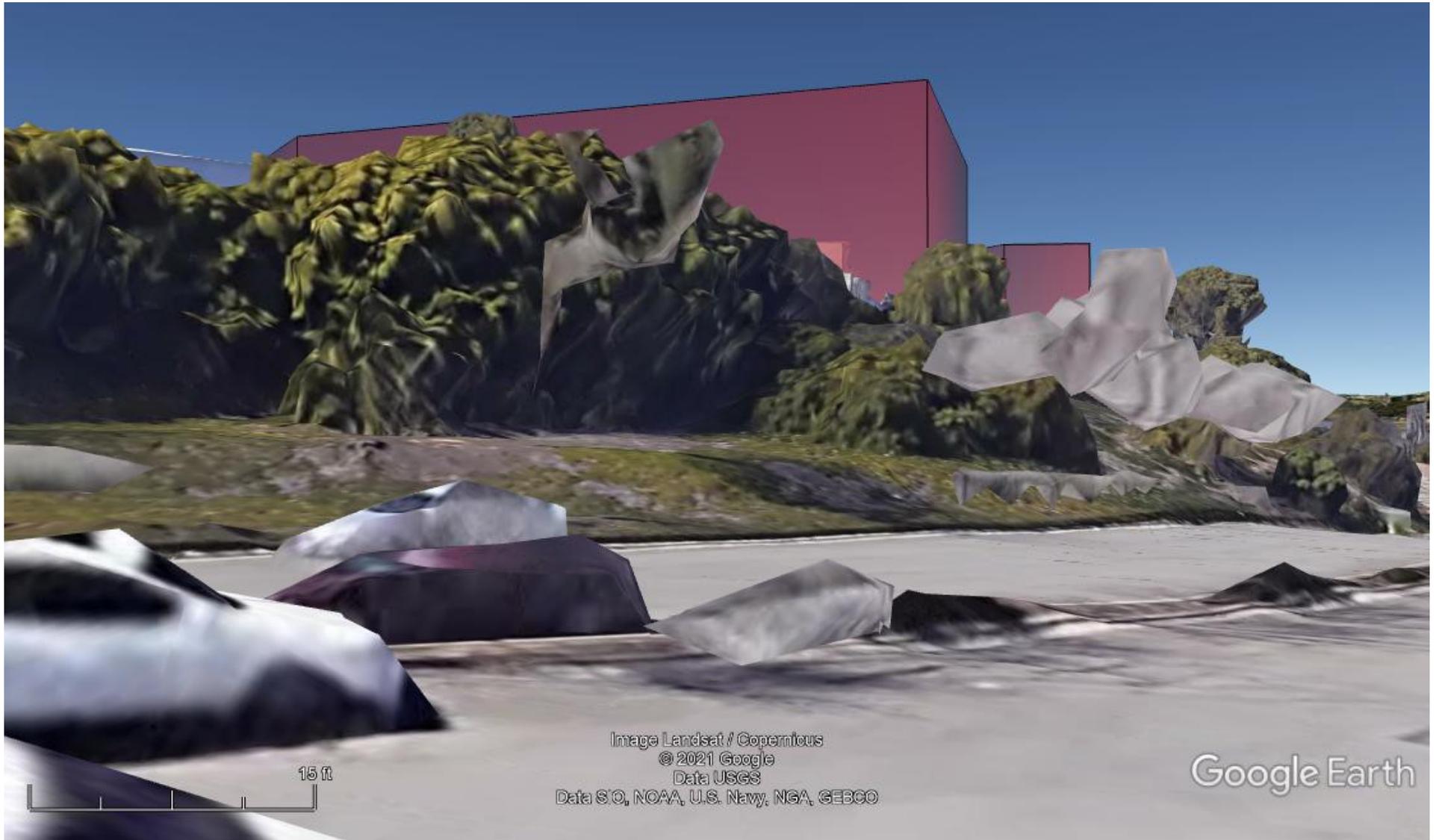
10-1/2 Story Parking Ramp (R)



From 1400 Diamond

10-1/2 Story Parking Ramp (L)

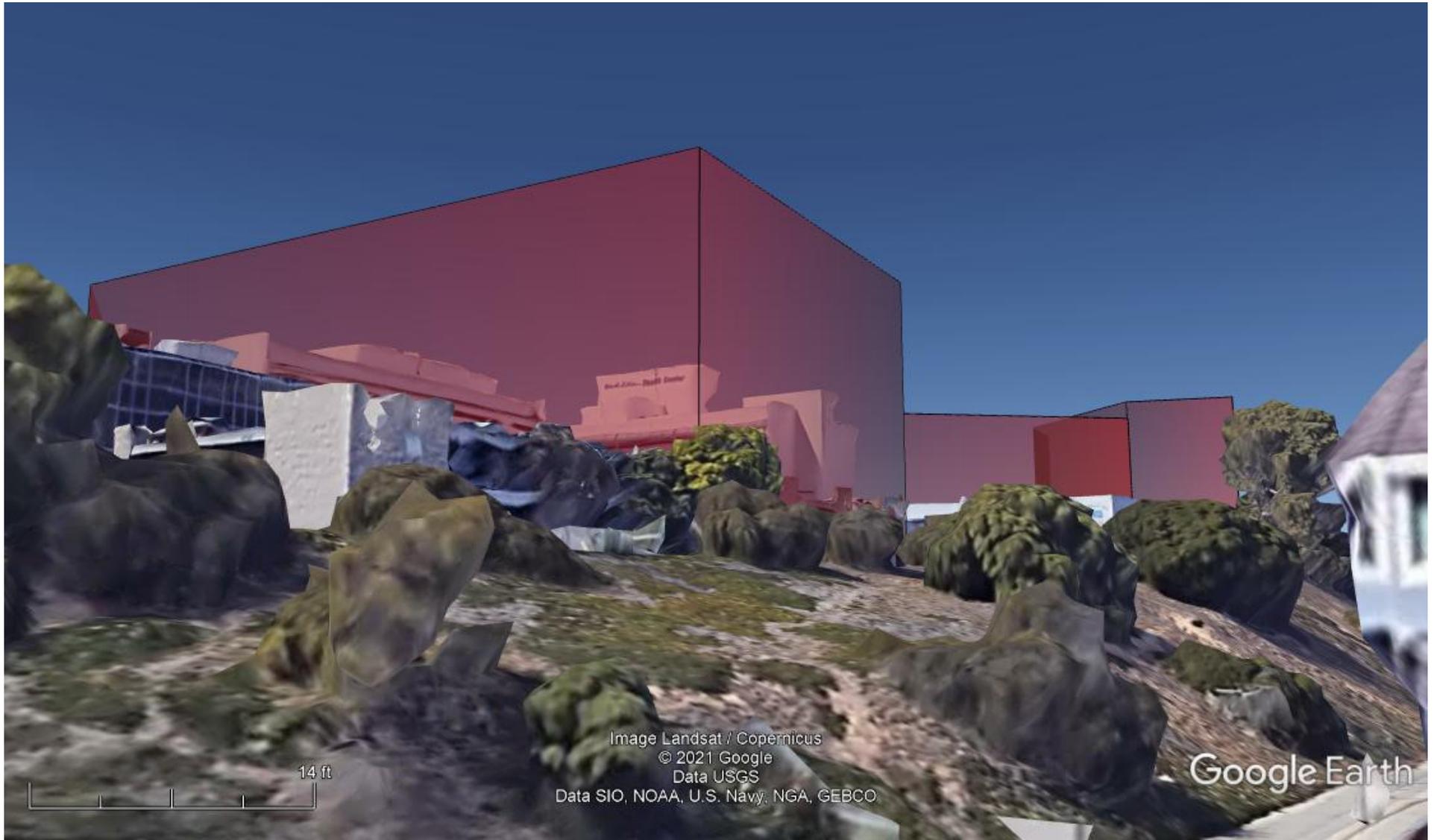
6-story, 103-foot , \$12,000+/month Assisted Living (R)



From 1408 Diamond

10-1/2 Story Parking Ramp (L)

6-story, 103-foot , \$12,000+ /month Assisted Living (R)



# From 1201 Beryl

6-story, 103-foot , \$12,000+/month Assisted Living (L)

4-story, 65-foot tall Health Club Pavilion (R)



# From 1211 Beryl

6-story, 103-foot , \$12,000+/month Assisted Living (L)



7 ft

Image Landsat / Copernicus  
Data S.O, NOAA, U.S. Navy, NGA, GEBCO  
© 2021 Google  
© 2021 INEGI

Google Earth

# From 1221 Beryl

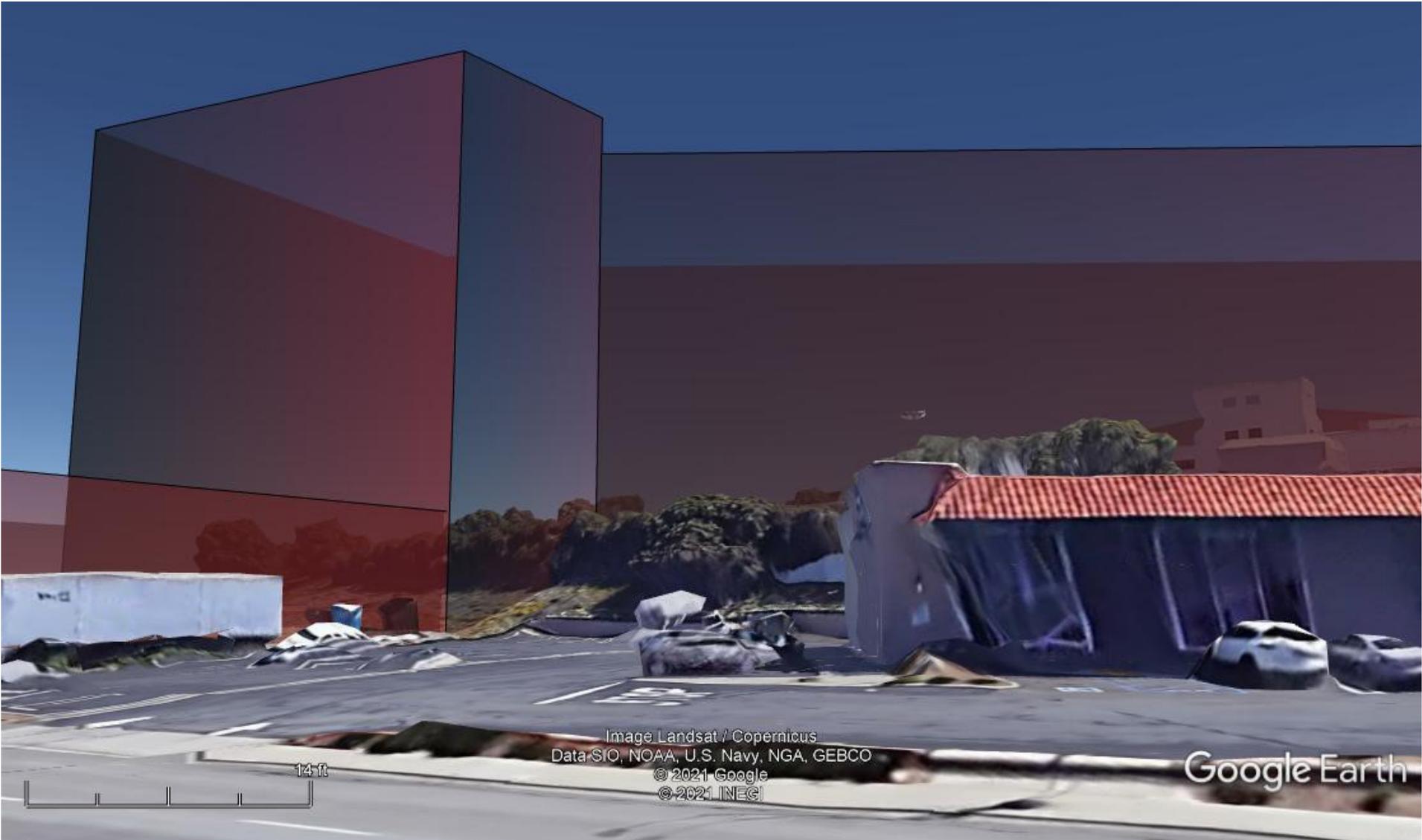
6-story, 103-foot , \$12,000+/month Assisted Living (L)



From 1311 Beryl

PACE (L)

6-story, 103-foot , \$12,000+/month Assisted Living (R)



From 1321 Beryl

PACE (Front)

6-story, 103-foot , \$12,000+ /month Assisted Living (Top + R)



# From Towers Elementary

PACE (R)

6-story, 103-foot , \$12,000+/month Assisted Living (C)

4-story, Health Club/Pavilion (C)

10-1/2 Story Parking (L)



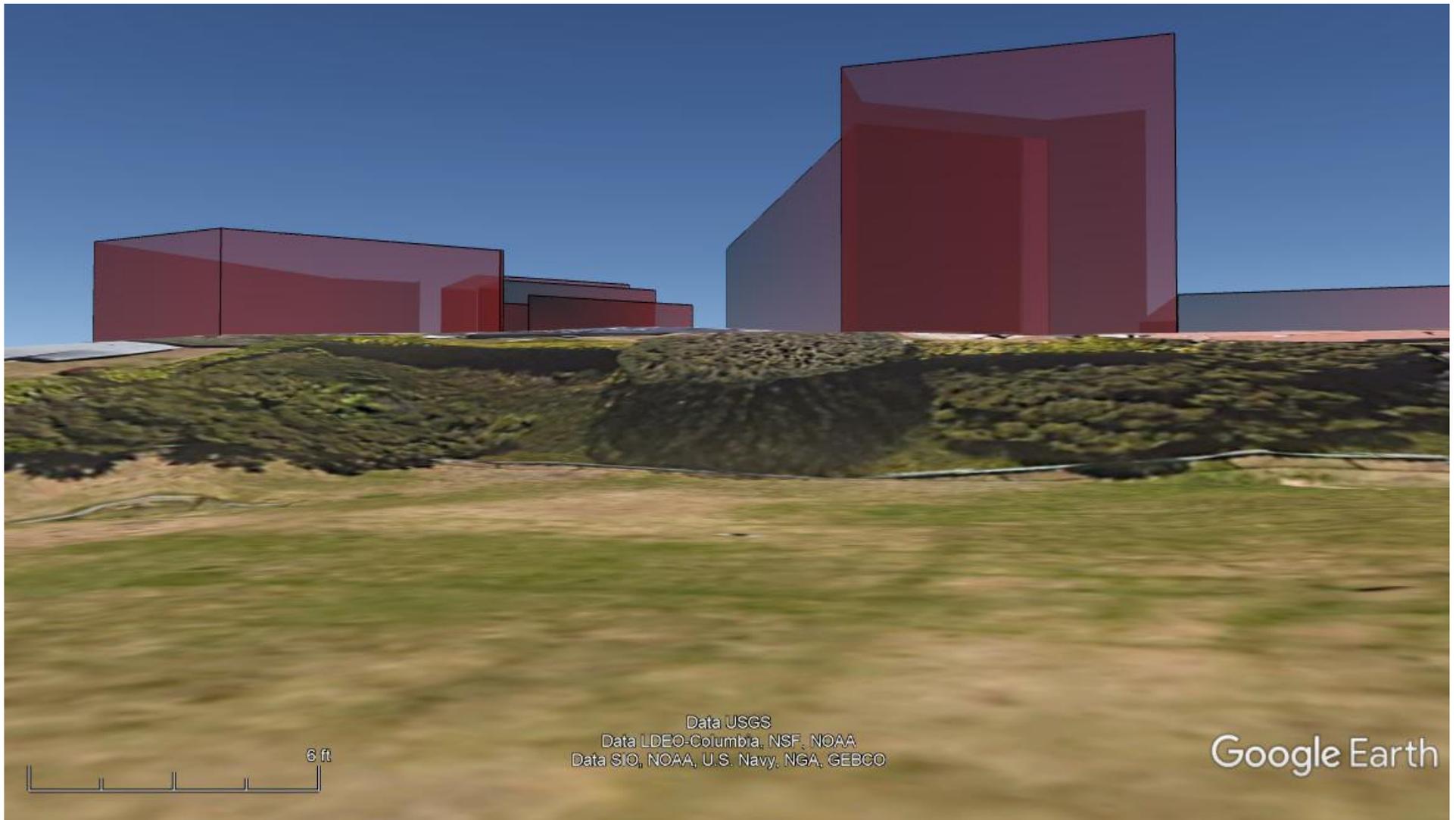
# From Towers Elementary School and Public Recreation Fields

PACE (R)

6-story, 103-foot , \$12,000+/month Assisted Living (C)

4-story, Health Club/Pavilion (C)

10-1/2 Story Parking (L)



# From 19301 Tomlee

10-1/2 Story Parking Ramp (L)

4-story, 65-foot tall Health Club Pavilion (C)

6-story, 103-foot , \$12,000+/month Assisted Living (R)



# From 19326 Tomlee

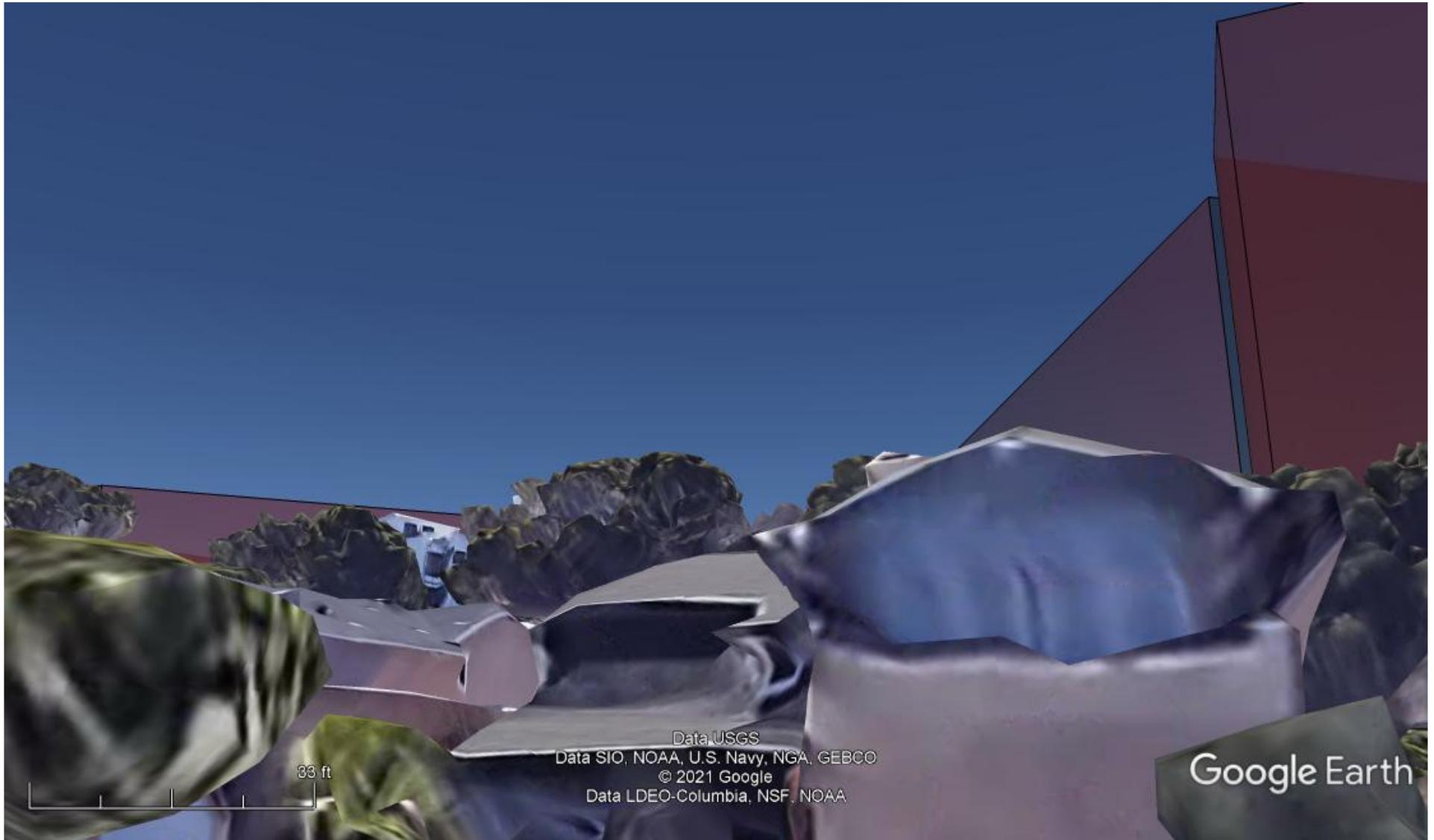
6-story, 103-foot , \$12,000+/month Assisted Living (R)



From 19326 Tomlee

10-1/2 Story Parking Ramp (L)

6-story, 103-foot , \$12,000+/month Assisted Living (R)

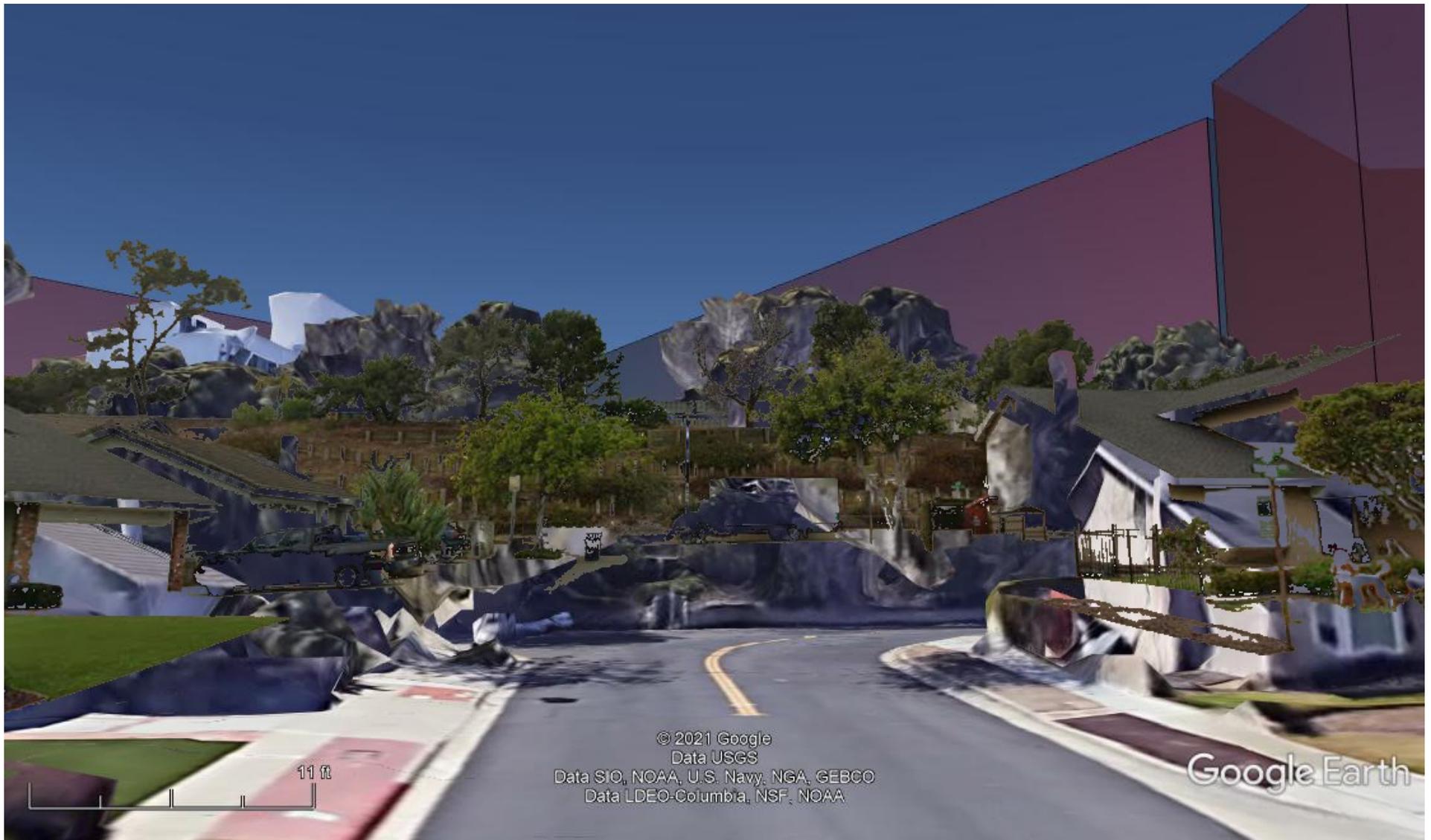


# From 5656 Towers

6-story, 103-foot , \$12,000+/month Assisted Living (R)

4-story, 65-foot tall Health Club Pavilion (C)

10-1/2 Story Parking Ramp (L)



# From 5635 Towers

6-story, 103-foot , \$12,000+/month Assisted Living (R)

4-story, 65-foot tall Health Club Pavilion (C)

10-1/2 Story Parking Ramp (L)



From 19510 Tomlee

6-story, 103-foot , \$12,000+/month Assisted Living (R)

4-story, 65-foot tall Health Club Pavilion (C)

10-1/2 Story Parking Ramp (L)



# From 19802 Tomlee

6-story, 103-foot , \$12,000+/month Assisted Living (R)

4-story, 65-foot tall Health Club Pavilion (C)

10-1/2 Story Parking Ramp (L)



# From 827 Anita

6-story, 103-foot , \$12,000+ /month Assisted Living



# From 600 Anita

6-story, 103-foot , \$12,000+ /month Assisted Living (L)

4-story, 65-foot tall Health Club Pavilion (C)

10-1/2 Story Parking Ramp (L)



# From 700 N Paulina

6-story, 103-foot , \$12,000+/month Assisted Living (L)

4-story, 65-foot tall Health Club Pavilion (C)

10-1/2 Story Parking Ramp (L)



**From:** [Mark Nelson \(Home Gmail\)](#)  
**To:** [Planredondo](#); [CityClerk](#); [Michael Webb](#)  
**Subject:** Fwd: Comments on Significant Visual Character Impacts of the BCHD Project  
**Date:** Thursday, February 29, 2024 12:31:28 AM  
**Attachments:** [Aesthetics - Significant Neighborhood Character Impacts.pdf](#)

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

Public Comment: Mayor, Council, Planning Commissioners, City Attorney, GPAC Record

On April 7, 2021, a detailed analysis of the impacts of the height and mass of BCHD's proposed development on P-CF zoned property was entered into the record of the GPAC. It reflected the negative impacts of excessive height and square feet on the community surrounding P-CF zoning using the example of BCHD's proposed nearly 800,000 sf Phase 1 and Phase 2 commercial development. The document was provided to the Planning Director and GPAC for review in determining appropriate height and density limits for the general P-CF zoning. FAR is a common method of creating a numerical standard.

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

**From:** **Mark Nelson (Home Gmail)** [REDACTED]  
**Date:** Wed, Apr 7, 2021 at 5:54 PM  
**Subject:** Comments on Significant Visual Character Impacts of the BCHD Project  
**To:** <[PlanRedondo@redondo.org](mailto:PlanRedondo@redondo.org)>, Brandy Forbes <[brandy.forbes@redondo.org](mailto:brandy.forbes@redondo.org)>

Attached is the latest modeling of the significant impacts to neighborhood visual character for both Redondo and Torrance neighborhoods. It is important that GPAC keeps its eye on the ball when making recommendations, so that well-intended policies don't leave other neighborhoods with out of character 103-foot, 800,000 sqft development proposals to fight.

cc: Redondo Beach Planning Commissioners as Public Comment

**From:** [Mark Nelson \(Home Gmail\)](#)  
**To:** [CityClerk](#); [Planredondo](#); [Michael Webb](#)  
**Subject:** Fwd: Public Comments to Torrance and Redondo Beach Mayor, Council and Planning Commissions  
**Date:** Thursday, February 29, 2024 12:37:10 AM  
**Attachments:** [Redondo North Branch Library P-CF.PNG](#)  
[Broadway Fire Station P-CF.PNG](#)  
[Beryl Yard P-CF.PNG](#)  
[Andrews Park P-CF.PNG](#)  
[Grant Fire Station P-CF.PNG](#)  
[Kensington P-CF.PNG](#)

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

Public Comment: Mayor, Council, Planning Commission, City Attorney, GPAC

On December 7, 2020, a public comment document was provided into the record of the Mayor, Council, Planning Commission and Planning Director describing the general character of existing P-CF structures and their surrounding neighborhoods for the purpose of comparison of height, mass, character and density of P-CF development. As noted, a nearly 100-foot above the street, 800,000 sf P-CF development is far, far different than any other existing P-CF land use.

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

**From:** **Mark Nelson (Home Gmail)** [REDACTED]  
**Date:** Mon, Dec 7, 2020 at 6:27 PM  
**Subject:** Public Comments to Torrance and Redondo Beach Mayor, Council and Planning Commissions  
**To:** <[cityclerk@redondo.org](mailto:cityclerk@redondo.org)>, <[CityClerk@torranceca.gov](mailto:CityClerk@torranceca.gov)>, Brandy Forbes <[brandy.forbes@redondo.org](mailto:brandy.forbes@redondo.org)>

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

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

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

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

BCHD is an incompatible future use for the parcel.

Mark Nelson

3+ Year Volunteer BCHD CWG

Redondo Beach Property Owner

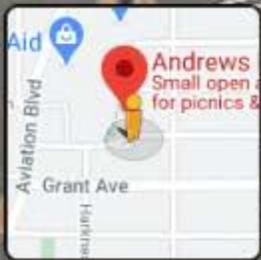
Expert Witness

Retired VP and Planning Director

1828 Rockefeller Ln  
Redondo Beach, California



Street View



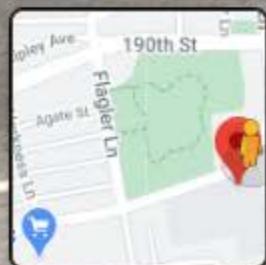
Google

19160 N Beryl St

Torrance, California



Street View



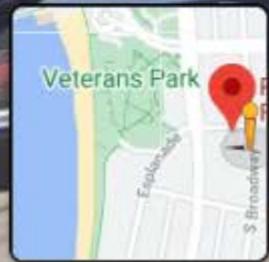
Google

406 S Broadway

Redondo Beach, California



Street View

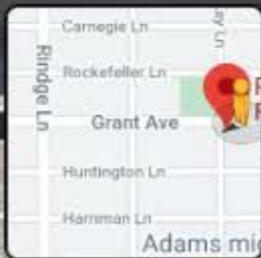


Google

2405 Grant Ave  
Redondo Beach, California



Street View

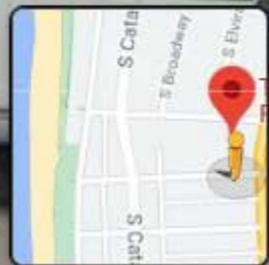


Google

228 Avenue A  
Redondo Beach, California



Street View

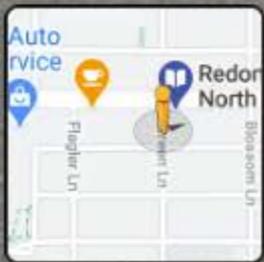


Google

1952 Green Ln  
Redondo Beach, California



Street View



Google

**From:** [Mark Nelson \(Home Gmail\)](#)  
**To:** [CityClerk](#); [Planredondo](#); [Michael Webb](#)  
**Subject:** Fwd: BCHDs Proposed Overdevelopment is Inconsistent with More Current P-CF Zoned Development  
**Date:** Thursday, February 29, 2024 1:14:23 AM  
**Attachments:** [Required Approvals - BCHD Proposal Inconsistent with current P-CF development.pdf](#)

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Public Comment Mayor, Council, Planning Commission, City Attorney, GPAC

On June 7, 2021, the City of Redondo Beach was presented with a detailed analysis of ALL P-CF parcels in the City, including photos, impacts, and neighborhoods. The analysis clearly showed that a tall, high mass, high FAR development on P-CF was both inconsistent with existing P-CF, but at 800,000 sqft and over 100-feet tall, it was a wildy out of scale and character with surrounding neighborhoods. This detailed analysis was reviewed by the Planning Director and available to GPAC and any City Department.

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

**From:** **Mark Nelson (Home Gmail)** <[REDACTED]>  
**Date:** Mon, Jun 7, 2021 at 3:32 PM  
**Subject:** BCHDs Proposed Overdevelopment is Inconsistent with More Current P-CF Zoned Development  
**To:** Eleanor Manzano <[cityclerk@redondo.org](mailto:cityclerk@redondo.org)>, Brandy Forbes <[brandy.forbes@redondo.org](mailto:brandy.forbes@redondo.org)>  
**Cc:** <[zein.obagi@redondo.org](mailto:zein.obagi@redondo.org)>, Christian Anthony Horvath <[REDACTED]>, <[todd.loewenstein@redondo.org](mailto:todd.loewenstein@redondo.org)>, Nils Nehrenheim <[nils.nehrenheim@redondo.org](mailto:nils.nehrenheim@redondo.org)>, Laura Emdee <[laura.emdee@redondo.org](mailto:laura.emdee@redondo.org)>, Christian Horvath – Redondo Beach District 3 Council Member <[christian.horvath@redondo.org](mailto:christian.horvath@redondo.org)>, Bill Brand <[bill.brand@redondo.org](mailto:bill.brand@redondo.org)>

PUBLIC COMMENT

Dear Mayor, Council and Commission:

The attached PDF shows all 7 P-CF parcels in the City of Redondo Beach and demonstrates how they conform to a consistency requirement of the local neighborhoods. The proposed BCHD is well outside 2 standard deviations of the local neighborhoods in both height and size.

Please include comments in the DEIR demonstrating the City's concern regarding the BCHD project's lack of conformance with required approvals.

## BCHDs Proposed Overdevelopment is Inconsistent with More Current P-CF Zoned Development

From: Mark Nelson  
Redondo Beach Property Owner  
3+ Year BCHD Volunteer, Community Working Group

Based on information from the City of Redondo Beach, there are seven (7) P-CF parcels in Redondo Beach. They are:

- |                                   |  |
|-----------------------------------|--|
| 1) Andrews Park                   | 1801 Rockefeller Ln, Redondo Beach, CA 90278     |
| 2) Beach Cities Health District   | 514 N. Prospect Av, Redondo Beach, CA 90277      |
| 3) Broadway Fire Station (#1)     | 401 S Broadway, Redondo Beach, CA 90277          |
| 4) City of Redondo Beach Facility | 1513 Beryl St, Redondo Beach, CA 90277           |
| 5) Grant Fire Station (#2)        | 2400 Grant Ave, Redondo Beach, CA 90278          |
| 6) Kensington Assisted Living     | 801 S Pacific Coast Hwy, Redondo Beach, CA 90277 |
| 7) North Branch Library           | 2000 Artesia Bl, Redondo Beach, CA 90278         |

With the exception of BCHD, the former South Bay Hospital parcel and the City of Redondo Beach multiple use facility, the remaining five (5) P-CF parcel uses appear to be consistent with surrounding land uses from a design, height, and traffic perspective. Both the current BCHD and the 103-foot tall, 800,000 sqft proposed overdevelopment are inconsistent with more current, allowed P-CF development.

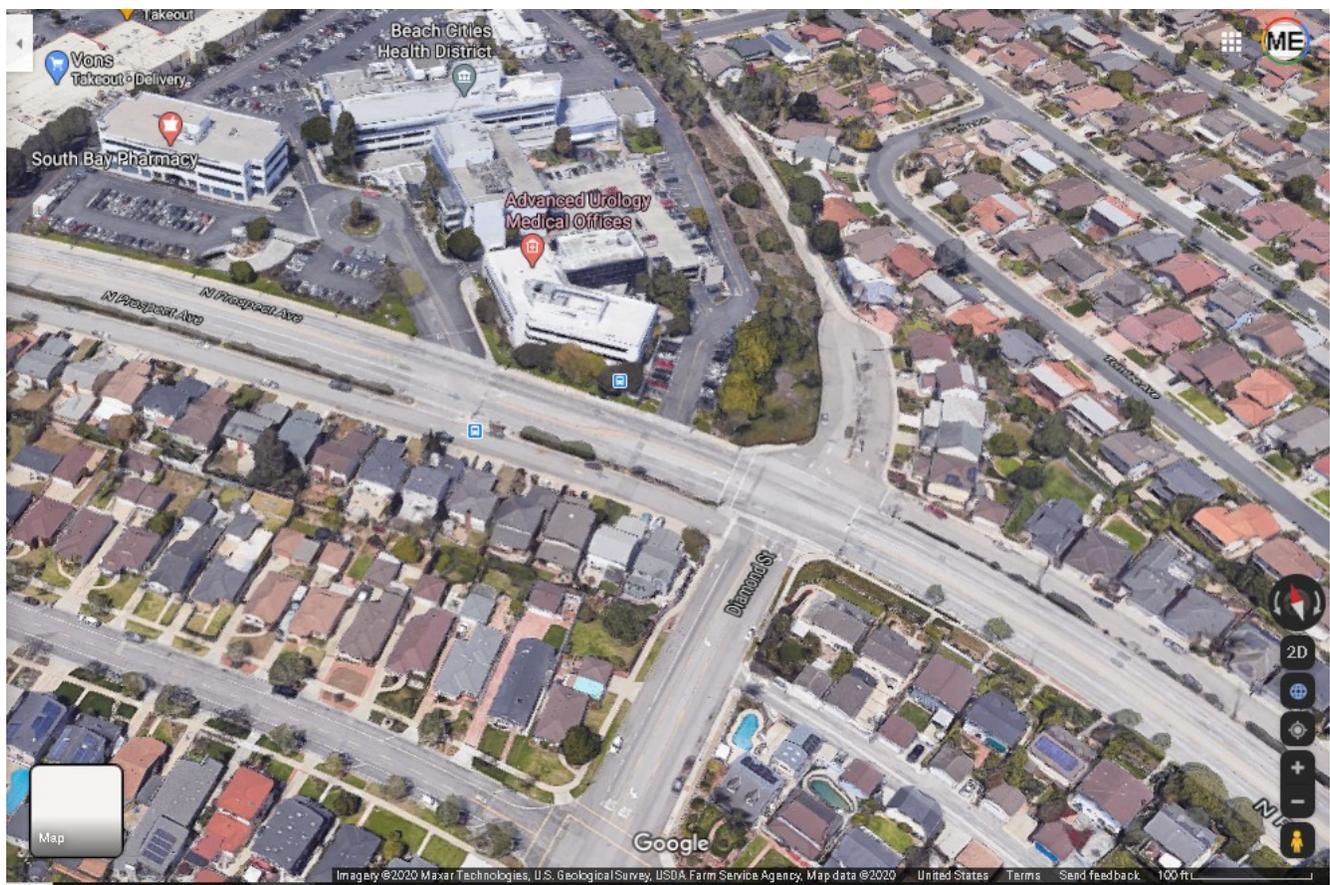
### Andrews Park

Per the City of Redondo Beach, Andrews Park is local neighborhood recreation facility, “Andrews Parkette is a 1.61 acre park located just north of Grant Avenue in Redondo Beach. The park features grass, trees, play equipment, picnic tables and picnic shelter.” Based on observation, there are no features at Andrews Park, such as commercial buildings or tall parking structures that are inconsistent with the surrounding neighborhood uses and design. Andrews Park is a recreation facility per the City of Redondo Beach.



### Beach Cities Health District (BCHD)

BCHD was renamed from South Bay Hospital District (SBHD) in 1993 following the 1984 failure of South Bay Hospital as a publicly-owned emergency hospital, and the subsequent failure as a leased facility to AMI/Tenet. Per Google Earth Pro (GEP) measurements, the hospital towers are generally 4-story, 60-feet tall. Per BCHD, there is a single, 968-sqft “penthouse” mechanical room atop the 514 N. Prospect hospital building at 75-feet. That represents 0.3% of the approximately 300,000-sqft of the existing campus buildings. At 75-feet, BCHD is 250% the height of surrounding 30-foot height zoning limits. SBHD also allowed construction of two (2) medical office buildings on land it leased to third (3rd) parties. These buildings are both 3-stories and 40-feet, also according to GEP measurements. They are both 130% of local zoning height restrictions and the 510 N. Prospect building is built at the west-most lot line, increasing its mass, noise reflection, and visual height to a maximum for its construction. At 130% to 250% in excess of surrounding zoning height limits, with concrete sound-reflective walls, substantial reflective glass, night time outdoor lighting, traffic, and emergency siren activity, BCHD is not consistent with the surrounding neighborhoods in function nor design.



### Broadway Fire Station (#1)

Per in-person visual inspection, the Broadway Fire Station is a corner lot with general building height of 1-story, except for a specialized small footprint multistory tower. The overall facility is generally lower height than surrounding residential and multi-family facilities and built in a not dissimilar architectural design to minimize its impacts.



### City of Redondo Beach Facility (Beryl St)

Per in-person visual inspection, this multi-use facility houses both the police shooting range and a number of public works functions. It is in the southeastern most corner of the Dominguez Park parcel, adjacent to the Edison right-of-way and across the street from Towers Elementary. The Edison right-of-way to the north is utility/industrial use and the park to the west is public use and significantly elevated above the parcel. The Torrance public facility, Towers Elementary is to the south. There is some residential to the east behind a sound wall. On three (3) sides, the use of this parcel is consistent with its surrounding public facility zoning, although the police shoot range has decades of controversy surrounding it. The residential to the east is buffered by a strip of land and the road. Most of this parcel's surrounding neighbors are consistent uses.



### Grant Fire Station (#2)

Per in-person visual inspection, the Grant Fire Station is a corner lot with general building height of 1-1/2-stories, except for a specialized small footprint multistory tower. The overall facility is generally lower height than surrounding residential and multi-family facilities except for the specialized tower, and built in a not dissimilar architectural design to minimize its impacts.



### Kensington Assisted Living

Per the City of Redondo Beach EIR, the project includes an 80,000-square foot assisted living facility with 96 suites and 11,000-sqft of common space on 3.37 acres gross. The footprint of the facility buildings is 1.15 acres based on aerial analysis. The architecture and design is earth tone Spanish revival and at 33-foot maximum height is very consistent with the surrounding single and multifamily residential.



### North Branch Library

Based on aerial analysis and GEP, the North Library is approximately 12,000 sqft footprint and surrounded on three (3) sides by commercial development. To the south is multifamily residential. Based on in-person inspection, the interface of the tallest point of the library and the multi-family to the south are approximately equal height at two (2) stories. The mixed use to the north of the Library is nominally 4-stories and more visually massed than the Library. The Library has clean design and is consistent with the adjoining land uses visually and in terms of height, is lower than the land use to the north.



### Conclusion

Based on this analysis, only BCHD is vastly out of scale and design with surrounding neighborhoods. Except for a small, local servicing strip mall to its north, the 30-foot elevated site of BCHD is visible to all residential construction on all four (4) sides of the lot. Noise, aesthetic blight, glare, reflection, night

time lighting, traffic, sirens, and associated PM2.5 emissions are inconsistent with surrounding land uses, notwithstanding any CEQA self-certification by BCHD.

Further, BCHD had developed a moral obligation to protect the community standard that is more stringent than laws and ordinances. This moral obligation standard was used by BCHD to justify seismic retrofit or demolition of the 514 hospital building. Consistent application of the standard to the surrounding neighborhoods, 60+ years of economic and environmental injustice by SBHD and BCHD, and a proposed 50-100 years more of economic and environmental injustice renders this overdevelopment unbuildable.

Last, the current BCHD has only 0.3% of its campus sqft at 75-feet tall. The 514 building is on average just slightly over 30-feet tall, and as such, that average height should serve as the average height cap to any future site development under a CUP for P-CF zoning.

#### Redondo Beach Code Conformance

The current BCHD at 312,000 sqft does not appear to conform with existing Redondo Beach code for issuance of a Conditional Use Permit. The proposed 793,000 sqft, 103-feet tall, 6-story senior apartments and 10-1/2 story, car parking structure violate the following RBMC section based on height, noise, invasion of privacy, and excess generated traffic. In addition, the proposed BCHD overdevelopment is inconsistent with design guidelines for Beryl Heights.

#### 10-2.2506 Conditional Use Permits.

(a) Purpose. The purpose of a Conditional Use Permit shall be to review certain uses possessing unique characteristics, as listed in Article 2 of this chapter, to **insure that the establishment or significant alteration of those uses will not adversely affect surrounding uses and properties** nor disrupt the orderly development of the community. The review shall be for the further purpose of stipulating such conditions regulating those uses to assure that the criteria of this section shall be met.

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

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

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

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

**From:** [Mark Nelson \(Home Gmail\)](#)  
**To:** [CityClerk](#); [Planredondo](#); [Michael Webb](#)  
**Subject:** Fwd: CPRA - FAR components for P-CF zoned parcels  
**Date:** Thursday, February 29, 2024 12:26:04 PM

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

#### Public Comment

As noted below in the email of Sep 27, 2021, the Planning Director was again put on notice that the FAR was an issue with P-CF and that sufficient public data was not even available to compute the FARs of the P-CF parcels in Redondo Beach. Throughout the activity of the GPAC, FAR for P-CF was an issue and was presented to the Planning Director, Mayor, Council, Planning Commission and GPAC.

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

**From:** **Mark Nelson (Home Gmail)** [REDACTED]  
**Date:** Mon, Sep 27, 2021 at 5:08 PM  
**Subject:** CPRA - FAR components for P-CF zoned parcels  
**To:** Eleanor Manzano <[cityclerk@redondo.org](mailto:cityclerk@redondo.org)>  
**Cc:** Brandy Forbes <[brandy.forbes@redondo.org](mailto:brandy.forbes@redondo.org)>

After searching the public record and the county assessor records, I cannot find sufficient data to compute the Floor Area Ratios of the P-CF zoned parcels, with the exception of Kensington using the EIR data (i.e., 80,000 sqft facility on a 3.37 acre parcel) and BCHD (i.e., 312,000 sqft on a 10.4 acre parcel). The same data is not available for Fire Station 1 or 2, the North library, the maintenance facility on Beryl, or the park.

Request: Please provide the lot size and building sqft values needed to compute the FAR for the P-CF parcels.

If the city concurs that the BCHD and Kensington data that I cite is accurate, then please provide the other 5 locations. If the City does not concur with my BCHD and Kensington data, then provide data for all 7 P-CFs

Thank you.

**From:** Mark Nelson (Home Gmail)  
**To:** City Clerk; Niki Niehreneheim; Todd Loewenstein; Zein Ohagi; Paige Kaluderovic; Scott Behrendt; Planredondo; Sean Scully; James Light  
**Cc:** Lisa Jacobs; Kevin Conry; Garth Meyer; llu@scng.com  
**Subject:** PUBLIC COMMENT: GPAC PUBLIC/INSTITUTIONAL/OPEN SPACE F.A.R. GPAC PUBLIC RECORD  
**Date:** Thursday, February 29, 2024 7:50:43 PM  
**Attachments:** [image.png](#)  
[image.png](#)  
[image.png](#)  
[image.png](#)

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

Public Comment: All agencies and electeds

The public record of the GPAC and of public comments is progressive and extensive on the matter of Public/Institution FAR. With the exception of member Lamb, no written comments appear on the topic of the FAR (subject to check) by other GPAC members. As is clear to any reader, there is a robust discussion/simulation/documentation of the impacts of height, mass, and FAR differences in Public (P-CF) usage submitted to the record. The damaging impact of excessive FAR development is demonstrated with visualizations.

In addition, the GPAC had a paid consulting firm to provide support, analysis and respond to questions. As typical public committees go, GPAC was relatively resource rich during its operation.

**CONCLUSION**

- 1) The assignment of 0.75 FAR for most P/I/O (Public zoning) is consistent with the surrounding neighborhoods.
- 2) Furthermore, removing the subjectiveness of the FAR determination from the CUP process for P-CF is consistent with the State mandate of objective standards in planning and design requirements and remove (to the extent possible) the subjective standards.

**PUBLIC COMMENT DEC 7, 2020 "BCHD is the only incompatible zoning use in Redondo Beach in a P-CF zone"**

Email with 6-page simulation attachment comparing P-CF implementations in the City of Redondo Beach  
 BCHD is identified as a clear land use outlier  
 Provided to the Planning Director and City Clerk for distribution

**PUBLIC COMMENT APRIL 7, 2021 "Comments on Significant Visual Character Impacts of the BCHD Project"**

26-page Google Earth-based simulation of BCHD's proposed roughly 100-foot tall, 800,000 sf Phase 1 & 2 project.  
 Provided to demonstrate the negative impacts of height, mass, and high FAR  
 Provided to both PlanRedondo and the Planning Director for distribution

**PUBLIC COMMENT JUNE 7, 2021 "CHDs Proposed Overdevelopment is Inconsistent with More Current P-CF Zoned Development"**

6-page detailed analysis of ALL P-CF zoned sites in Redondo Beach demonstrating how existing uses are reflect an outlier.  
 Demonstrates the negative impacts visually of height, mass, and FAR in varying neighborhoods  
 Provided to City Council, City Clerk, and Planning Director for distribution

**GPAC 24 AGENDA PACKET FAR EXCERPT (0.75 to 1.25) 03312022**

Land Use Category definitions

- **Accept GPAC recommendation for:**
  - Mixed-Use
- **Revise and accept GPAC recommendation for:**
  - Commercial Neighborhood (allow 1.5 FAR along Artesia Blvd)
  - Industrial Flex (remove incubator space as a use)
  - Public/Institutional (remove residential care facilities for the elder, reduce FAR to 0.75 with exceptions for City Hall and City Annexation site which allow up to 1.25 FAR)
  - Parks and Open Space (reduce FAR to 0.20)
- **Retain current GP definitions for:**
  - All residential designations except RH
  - All commercial designations
  - Industrial designation I-2
- **Revise current GP definitions for:**
  - RH (retain description, but increase max density to 30 du/ac)
  - Note that existing commercial uses within residential land use districts are considered legally non-conforming
  - Industrial I-1 and I-3 (increase FAR to 1.00)
- **Change Residential Overlay Areas definition to reflect the adopted Housing Element:**
  - Commercial areas in Kingsdale neighborhood
  - North Tech Focus Area – North of 405
  - South of Galleria - near future transit center
  - 190<sup>th</sup> Street industrial areas
  - South PCH (Fed Ex/Lenscrafter)

PLAN redondo BEACH 16

**GPAC 25 FAR DRAFT EXCERPT (0.1 to 1.0) 08312022 FOR Public Facility**

Agendas & Staff Reports > 2022 > General Plan Advisory Committee > AG PKT 2022-08-31 GPAC

114 / 229 View plain text

RC	Recreational	rentals, restaurants, snack shops, retail, lodging accommodations, entertainment and similar uses	1.0 - 1.75 FAR
GC	Gateway	Lower floor community or regionally-oriented commercial uses with upper floor high-visitor office uses or hotel uses	1.0 - 2.0 FAR
SC	Service	Home improvement stores, furniture stores, auto dealerships, and light automotive service stations	0.25 - 0.5 FAR
CI	Light Industrial	Production uses for light manufacturing, creative art, or design services with professional office as an allowed accessory use	0.25 - 1.0 FAR
PF	Public Facility	Civic-related offices, community centers, operational facilities and educational/institutional facilities	0.10 - 1.0 FAR
		Passive and active park, recreational, open space	0.0 - 0.5 FAR

GPAC 25 FAR EXPECTED (0.75 to 1.25) 08312022

I-2-R <sup>2</sup>	I-2 with Residential Overlay	Max. FAR 1.00 / Up to and including 55 du/ac	FAR 1.0	FAR 1.0 / 55.0 du/ac	*	
I-3	Industrial (I-3)	Max. FAR 1.00	—	1.00 FAR	0.75	—
IF	Industrial Flex (IF)	Max. FAR 1.00	—	1.00 FAR	0.70	—
IF-R	IF with Residential Overlay	Max. FAR 1.00 / Up to and including 55 du/ac	FAR 2.0	FAR 1.0 / 55.0 du/ac	*	*
PI	Public/Institutional (PI)	Max. FAR 0.75 1.25 FAR at City Hall bounded by PCH, Broadway, Carnelian St, and Diamond St 1.25 FAR at the Annex site on Northeast Corner of PCH and Vincent St Subject to Planning Commission Design Review	—	0.75 FAR, du/ac as assumed in Housing Element	0.75 or 1.25	As assumed in Housing Element
U	Public/Utility (U)	Max. FAR 0.10	—	0.10	—	—
OS	Parks and Open Space (OS)	Max. FAR 0.05	—	0.05	—	—

- Source: PlaceWorks, 2022 and City of Redondo Beach
- Units on church properties are projected at 55 du/ac as allowed under state law and as identified in the Housing Element. Approximately 5 acres of church properties are included under the R-3 (26 units) and RH (12 units) designations.
  - See the 2021-2019 Housing Element Residential Sites Inventory for narrative description of Residential Overlay areas. See Table H-43 for development capacity within these areas.

MEMBER LAMB CLARIFYING COMMENT EXCERPT TO THE RECORD (FAR 1.25 for only 2 City properties) 08252022

LAND USE ELEMENT SUGGESTIONS  
Sheila W. Lamb  
8/25/2022

Page #	Existing Language	Proposed Change	Reason for Change
LU 1	"...this element is also a tool to...address long-term environmental issues such as air quality, climate change, and preservation of natural resources."	Add drought conditions/water shortage as an environmental issue in this sentence.	California is experiencing unprecedented drought conditions that will be a serious issue for the next 10 plus years. The land use element should contain at least one policy to address this issue.
LU 5	"Redondo Beach has maintained a steady annual average increase of 0.22% and is projected to reach a population of over 70,000 in 2020."	Change language to reflect current population numbers and state how the .22% is derived by comparing population numbers over time.	It is good practice to use updated population numbers and verify how percentages are derived. Doing so builds community trust.
LU 7	Redundant bullet points	Delete bullet point that is redundant.	No explanation needed
LU-9	RH-up to and including 30 du/ac	The existing regulations show 28 du/ac. Revert to existing du/ac.	Is there a compelling reason to go to 30 du/ac? In reference to the asterisk, the proposed residential overlay has its own requirements of "20 to 55 du/ac."
LU 10	MU-TC : 1)does not specify distance from a transit center; 2) location of offices on second floor to facilitate walkability is not specified.	1)include distance from transit center for clarification; 2) to increase walkability potential, office facilities should be located only on second floors.	As we have seen in other cities, walkability is reduced when offices are located on the ground floor. These locations should be reserved for restaurants, art shops, coffee shops, and other retail.
LU 11	Public/Institutional Maximum FAR 1.25	For residents, it is unclear whether the maximum FAR 1.25 is only for the city hall and the annex. It would be good if that is stated.	Although city staff and planning professionals may know what is meant, residents often need the next level of clarity.
LU 16	Build Out Estimate: 1) The table only includes the	Include in this table 1) a column with the	1) While the information in the table is

GPAC 26 FAR EXPECTED (0.75 to 1.25) (EXCERPT) 09292022 MEETING HANDOUT (unchanged from GPAC 25)

I-R	I with Residential Overlay	Max. FAR 1.00 / Up to and including 55 du/ac	FAR 2.0	FAR 1.0 / 55.0 du/ac	*	*
PI	Public/Institutional (PI)	Max. FAR 0.75 1.25 FAR at City Hall bounded by PCH, Broadway, Carnelian St, and Diamond St 1.25 FAR at the Annex site on Northeast Corner of PCH and Vincent St Subject to Planning Commission Design Review	—	0.75 FAR, du/ac as assumed in Housing Element	0.75 or 1.25	As assumed in Housing Element
U	Public/Utility (U)	Max. FAR 0.10	—	0.10	—	—

Conclusion - Except for 2 City of Redondo Beach uses, the P/I FAR is 0.75.

Mark Nelson  
Retired VP Mountainview LLC (an SCE Company)  
Retired Director of Planning SCE  
Expert Witness