

# **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 JULY 16, 2024**

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

- **PUBLIC COMMUNICATIONS**

**From:** [Mark Nelson \(Home Gmail\)](#)  
**To:** [CityClerk](#); [Planredondo](#); [Sean Scully](#)  
**Subject:** Fwd: PUBLIC COMMENT - BCHD's ONGOING FALSE CLAIM ABOUT RB GENERAL PLAN  
**Date:** Monday, July 15, 2024 1:17:04 PM

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Public comment, City Council and Planning Commission

**NO. Redondo Beach did NOT only place a 0.75 floor area ratio (FAR) on the BCHD parcel. THAT IS SIMPLY FALSE and BCHD continues to email out that false claim over and over.**

All Public/Institutional (P/I) zoned land was designated 0.75 FAR except for a limited area of City-owned land that is held for development for the BENEFIT of CITY OF REDONDO BEACH RESIDENTS. All other similarly zoned P/I land, including the failed South Bay Hospital campus (assumed by BCHD) was zoned for 0.75 FAR.

Why would the City take this action? It's quite simple. The taller, larger and denser a development is, the more damage to surrounding health, quality-of-life, and property values it creates. That's a development fact. By limiting the FAR to 0.75, the City is protecting the health, quality-of-life, and property values of surrounding residents. In the special case where all the benefits of municipal development accrue almost exclusively to residents of Redondo Beach, the City increased the density of development to 1.25 FAR.

This isn't just about BCHD. But even if it were, BCHD's Healthy Living Campus is for the benefit of a supermajority of non-Redondo Beach residents. The HLC is 91% to 97% non-residents of Redondo Beach. So quite clearly, the damages of dense development overwhelm any benefits to nearby Redondo Beach neighborhoods as BCHD develops to house 91% non-RB resident tenants in the assisted living, 95% non-RB resident participants in allcove and 97% non-RB resident enrollees in PACE.

The City must create objective standards for development. The prior standard is no longer acceptable, and it was loosely "whatever the Planning Commission decided". That could have been an FAR of 0.1 to 2.0 or higher. Now, the FAR is 0.75 for all P/I development except a limited amount of City-owned land to be developed for resident benefit.

This is a Redondo Beach General Plan for the benefit of Redondo Beach residents. The City has no obligation to make any concessions to commercial developers like PMB LLC as they consume our precious P/I land on the BCHD campus for 95 years. We need local, not regional benefits in exchange for the give generations of residents who reside in Redondo who will be denied use of taxpayer owned land by BCHD as it services a supermajority of non-residents of the City.

Mark Nelson  
Redondo Beach

**From:** [Stop BCHD](#)  
**To:** [CityClerk](#); [cityclerk@hermosabeach.gov](mailto:cityclerk@hermosabeach.gov); [cityclerk@manhattanbeach.gov](mailto:cityclerk@manhattanbeach.gov); [rmiller@health-law.com](mailto:rmiller@health-law.com); [rlundy@health-law.com](mailto:rlundy@health-law.com); [info](#); [Garth Meyer](#); [tliu@scng.com](mailto:tliu@scng.com); [Nils Nehrenheim](#); [Todd Loewenstein](#); [Zein Obagi](#); [Paige Kaluderovic](#); [Scott Behrendt](#); [Planning Redondo](#); [planning@hermosabeach.gov](mailto:planning@hermosabeach.gov); [Planredondo](#); [executiveoffice@bos.lacounty.gov](mailto:executiveoffice@bos.lacounty.gov)  
**Subject:** Public Comment - BCHD's misinformation regarding FAR and Redondo Beach  
**Date:** Friday, July 12, 2024 5:56:24 PM

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Public Comment all Electeds, Agencies, and City Councils & Planning Commissions

Yet again, BCHD is caught not telling the entire story, and insinuating that ONLY BCHD is being treated differently regarding FAR at the City of Redondo Beach. That is a lie by Webster's definition.

During the City Council meeting on FAR and the GP, the Council zoned ALL Public use land to 0.75 FAR. Not just BCHD - ALL parcels. Later in the meeting, because the benefits of City of Redondo Beach operations accrue to City of Redondo Beach residents, the Council increased only 2 lots to 1.25 FAR.

The City of Redondo Beach is very much **unlike** BCHD. The City is a statutorily required entity while BCHD is fully optional. In fact, 95% of LA County has no health district. The City services overwhelmingly residents, while BCHD services 91% non-residents in the allcove service area (including Long Beach), and plans to service 80% non-resident tenants in the assisted living (100% privately owned and operated on 100% PUBLIC land), and 95% non-resident enrollees in PACE.

BCHD dumps its damages from traffic, noise, chronic stress, and other operating hazards 100% into Redondo Beach. BCHDs programs will service 80% to 95% non-residents of the Health District under the proposed HLC plan. Worse yet, BCHD programs will service 91% to 95% non-residents of REDONDO BEACH - since Redondo Beach is only 50% of the District.

Redondo Beach should not be damaged by 100% of BCHDs over development while Redondo Beach residents received only 5% to 9% of the HLC development benefits.

When BCHD starts telling the WHOLE TRUTH about its future plans for non-resident services and discloses its \$175M allcove liability for 30 years of operation, THEN AND ONLY THEN, can we consider allowing them to overbuild a parcel that was condemned by testimony to the Superior Court that he District would serve the "residents who reside" within the District - not a supermajority of non-residents.

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StopBCHD.com ([StopBCHD@gmail.com](mailto:StopBCHD@gmail.com)) is a Neighborhood Quality-of-Life Community concerned about the quality-of-life, health, and economic damages that BCHDs 110-foot above the street, 800,000 sqft commercial development will inflict for the next 50-100 years. Our neighborhoods have been burdened since 1960 by the failed South Bay Hospital project and have not received the benefit of the voter-approved acute care public hospital since 1984. Yet we still suffer 100% of the damages and we will suffer 100% of the damages of BCHDs proposal.

**From:** [Stop BCHD](#)  
**To:** [CityClerk](#); [Planredondo](#); [Planning Redondo](#); [Sean Scully](#)  
**Cc:** [lisa.jacobs@scng.com](mailto:lisa.jacobs@scng.com); [Kevin Cody](#)  
**Subject:** Public Comment - P/I FAR should be 0.75  
**Date:** Monday, July 15, 2024 12:22:22 PM

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Public Comment City Council, Planning Commission, Planning Department

Back in early 2022, City staff along with the City Council were forced by a State law change to add rigor and pre-published standards to development in the City. One of the few land use/zonings with significant Planning Commission discretion was in the public sector.

For example, P-CF (Public – Community Facilities) zoning had only subjective standards on how much building could be crammed onto a P-CF zoned lot. The Planning Commission was free to allow only 1 story, or 10 stories. The Planning Commission could enforce an FAR (Floor Area Ratio) of 0.1 or 2.0. Essentially, there were no objective rules for P-CF development.

**“A design standard that involves no personal or subjective judgment by a public official and are uniformly verifiable by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant or proponent and the public official prior to submittal.” (California Government Code, Section 65913.4)**

As a result, the Council provided a base FAR of 0.75 for P/I public-institutional land use and allowed for a 1.25 FAR in certain areas of City owned property for public services development. This was merely a conformance with the change in State law and provided the required objective standards.

BCHD has elected to claim this is “spot zoning” and is a taking from the District. By law, that is not true. The prior flexibility used by the Planning Commission no longer meets State law. Furthermore, the Planning Commission was free under the prior Redondo Beach Code to issue BCHD an FAR of 0.5 for future development. That would have been completely compliant with City Code. So BCHD is actually better off with 0.75 than with subjective standards.

City Staff and Council provided the FAR 0.75 base FAR and 1.25 limited FAR to the General Plan Advisory Committee (GPAC) in March of 2022. The draft document was provided to the members and the public three times, in March, August and September. How it could be that few GPAC members bothered to review the draft document throughout 2022 is simply astounding. Some did, and they even filed comments.

**For the protection of the surrounding public, the City should assign the FAR for P/I to 0.75 uniformly.**

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and have not received the benefit of the voter-approved acute care public hospital since 1984. Yet we still suffer 100% of the damages and we will suffer 100% of the damages of BCHDs proposal.

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**Subject:** Public Comment: BCHD continued disinformation campaign regarding its proposed bond measure  
**Date:** Thursday, July 11, 2024 3:21:17 PM

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On BCHD's website at <https://www.bchd.org/healthmeasure>, it states the following:

"State of the Current Campus

Our campus is home to the 63-year-old former hospital building located at 514 North Prospect Avenue in Redondo Beach. In 1955, residents of Hermosa Beach, Manhattan Beach and Redondo Beach voted to fund and build South Bay Hospital. Over the years the building has evolved its services to meet the health needs of the community. To address escalating maintenance costs as well as seismic and structural issues common with buildings built in the 1950s, BCHD plans to demolish the building in 2027 and replace it with approximately two acres of public open space."

**BCHD by deliberate choice omits facts that are critically necessary for voters to make an informed decision regarding the proposed bond measure.**

State of the Current Campus

Our campus is home to the 63-year-old former hospital building located at 514 North Prospect Avenue in Redondo Beach. In 1955, residents of Hermosa Beach, Manhattan Beach and Redondo Beach voted to fund and build South Bay Hospital (See #1 Below). Over the years the building has evolved its services to meet the health needs of the community. To address escalating maintenance costs as well as seismic and structural issues (See #2 Below) common with buildings built in the 1950s, BCHD plans to demolish the building in 2027 and replace it with approximately two acres of public open space.

**#1 -** According to District filings with the Superior Court, the District authority was based on providing services to the "residents who reside" within the District. ***BCHD no longer fulfills the voter approved mission of providing a public hospital for the "residents who reside" within the District*** due to expanded services for a supermajority of non-residents.

**allcove - 91% Non-Resident Service Area -** According to LA County Public Health records and BCHD press releases, the allcove youth mental health project services 91% non-residents of the District in the SPA8 service area. Further, BCHD has accepted a 30-year liability for providing all costs associated with the operation of the allcove building and services that we estimate at \$175M.

**Assisted Living - 80% Non-Resident Tenants by Zip Code -** Per BCHD's MDS consultant study, the zip codes of 90254, 90266, 90277 and 90278 will provide less than 20% of the prospective tenants for the planned, 100% privately owned and operated assisted living facility.

**PACE - 95% Non-Resident Enrollees -** BCHD refuses to provide its forecast of PACE use. As a result, the National PACE Association and US Census data were used to determine that

only 17 of 400 enrollees (5%) would be "residents who reside" in the District.

In conclusion, BCHD fails to disclose the limited geographic service area approved by voters "residents who reside" within the District from the District's pleading to Superior Court for land condemnation INGL-C-1594.

**#2** - According to District Consultant Reports - Seismic Best Practice allows up to 25 years of continued use of the building, and there is no legal requirement for BCHD to retrofit the building. **BCHD is proposing to demolish a TAXPAYER ASSET for 80%, 91% and 95% NON-RESIDENT SERVICES.**

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**Subject:** Public Comment: BCHD misrepresentations regarding seismic  
**Date:** Thursday, July 11, 2024 7:25:34 PM

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BCHD states at <https://www.bchd.org/healthmeasure> :

"Seismic and Maintenance Upgrades: \$90 Million

The cost of retrofitting the building to meet current seismic standards is not financially feasible. The District would need to charge approximately three times the average minimum monthly rental rate per square foot to fund debt service."

**BCHD implies an obligation for seismic retrofit, however, that is clearly a false statement.**

Seismic and Maintenance Upgrades: \$90 Million

The cost of retrofitting the building to meet current seismic standards (**See #1 below**) is not financially feasible. The District would need to charge approximately three times the average minimum monthly rental rate per square foot to fund debt service.

**#1** - According to BCHDs seismic consultant, Youssef Assoc., best seismic practice allows 25 years prior to retrofit or demolition, there is no existing ordinance requiring retrofit, and any action by BCHD is purely voluntary and not required. And in any event, retrofit to current standards is not REQUIRED.

**In conclusion, BCHD is attempting to mislead the public through deliberate omission of facts that are required by voters to make an informed decision.**

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**Subject:** Public Comment: BCHD misrepresentations regarding the beneficiaries of allcove costs related to bond funding proposal  
**Date:** Thursday, July 11, 2024 10:16:27 PM

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BCHD asserts that it seeks \$10M in bond funding for allcove. \$3M for the building upgrades and \$7M in earthmoving and parking lots (per The Beach Reporter interview with BCHD)

**BCHD hides the simple fact that allcove is 91% non-resident service area of the 3 beach cities of the District.**

BCHD agreed to accept \$2M in operating funding as a grant that required BCHD to accept LA County Service Planning Area 8 (1.4M population) as a service area. BCHD funding for allcove operations expires in June 2026.

BCHD agreed to accept \$6M in construction funds for an allcove building. Acceptance of that grant required 30 year continuous operation of allcove for the benefit of a 91% non-resident service area - both services and building.

BCHD conducted no financial analysis of the \$175M, 30-year obligation prior to acceptance.

**In conclusion, BCHD must stop misrepresenting the liability and service area of allcove. Absent \$175M in charity and other agency funding over the next 30 years, BCHD will have to turn to District taxpayers or the Courts to assess taxes to support the 91% non-resident service area allcove program and building.**

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