# RESOLUTION NO. CC-2410-105

**A RESOLUTION OF THE CITY COUNCIL OF REDONDO BEACH, CALIFORNIA, CERTIFYING THE FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT (STATE CLEARINGHOUSE NUMBER 2023050732), ADOPTING FINDINGS PURSUANT TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT, ADOPTING A STATEMENT OF OVERRIDING CONSIDERATIONS, AND ADOPTING A MITIGATION MONITORING AND REPORTING PROGRAM FOR THE REDONDO BEACH FOCUSED GENERAL PLAN UPDATE, ZONING ORDINANCE UPDATE AND LOCAL COASTAL PROGRAM AMENDMENT**

WHEREAS, the City's current General Plan was adopted on May 26, 1992; and

WHEREAS, on March 29, 2016 the City Council approved the City's three-year Strategic Plan goal to "Ensure sustainability, livability, and health by completing the General Plan update and by implementing environmentally responsible programs"; and

WHEREAS, on October 4, 2016, the City Council awarded the contract for planning and environmental consulting services to Placeworks, Inc. for updates to the "Land Use Element" and "Conservation, Recreation and Parks, and Open Space Element" of the City's General Plan and preparation of the required environmental documents; and

WHEREAS, on December 13, 2016 the City Council approved Resolution No. CC-1612-122 establishing a 27-member General Plan Advisory Committee (GPAC) to provide direct community stakeholder input to the update of the Land Use and Conservation, Recreation and Parks, and Open Space Elements of the General Plan including analysis and recommendations regarding amendments to the Mixed-Use Zoning and Development Standards, and opportunities for additional recreation, parks, and open space areas; and

WHEREAS, on February 21, 2017 pursuant to Resolution No. CC-1612-122, the Mayor and City Council selected the members of the GPAC and the City Clerk reviewed all selections and confirmed each was a resident of Redondo Beach. Two (2) members were appointed by the Mayor, one (1) of whom served as the Chair, and each Council Member appointed five (5) members, three (3) of whom resided in their District; and

WHEREAS, the GPAC conducted a total of twenty-eight (28) noticed public meetings since April 27, 2017, with their final meeting being held on January 31, 2024. At the final meeting, GPAC completed their discussions and recommendations for the final draft focused General Plan, which includes a consistently formatted, comprehensive General Plan document with a new Introduction, along with updated Goals, Policies, and Implementation Measures for the Land Use, Open Space and Conservation, Safety, and Noise Elements; and

WHEREAS, the City determined that, pursuant to the California Environmental Quality Act (CEQA) (Pub. Resources Code § 21000, et seq.), a program environmental impact report (PEIR) would be required for the proposed focused General Plan Update and associated Zoning Ordinances and Local Coastal Program Amendments required for consistency and to implement the City's certified 6th Cycle 2021-2029 Housing Element (the Project) and issued a Notice of Preparation (NOP) on June 1, 2023. The NOP was sent to the State Clearinghouse, responsible agencies, trustee agencies, and interested parties.

WHEREAS, on February 29, 2024 the City's Draft General Plan document was released for comment on the City's website, allowing the public and other interested parties to comment directly on the Draft General Plan Document. Additionally, on March 20, 2024 City staff and Placeworks, Inc. conducted an open house meeting to present and take input on the City's Draft General Plan update; and

WHEREAS, concurrently with the City's work on the Focused General Plan Update, work was also initiated on the City's 6th Cycle 2021-2029 Housing Element; and

WHEREAS, the City's 6th Cycle 2021- 2029 Housing Element presents a framework for meeting the housing needs of existing and future resident populations within the City based on the Regional Housing Needs Allocation (RHNA) of 2,490 units. While the RHNA allocation is 2,490 units, when accounting for a credit of 451 units and 240 anticipated ADUs, the total need with a 10% buffer is 1,944 units; and

WHEREAS, the 6th Cycle 2021- 2029 Housing Element identifies strategies and programs to conserve and improve existing affordable housing; provide adequate housing sites; assist in the development of affordable housing; remove governmental and other constraints to housing development; and promote equal housing opportunities in a strategic manner; and

WHEREAS, the 6th Cycle 2021- 2029 Housing Element actualizes the noted strategies and programs with proposed additional residential densities within mixed-use designations, residential recycling, residential overlays in commercial and industrial zones, and residential development on religious properties through coordination with nonprofit organizations; and

WHEREAS, the City Council, at its duly noticed public meetings on April 20, May 4, May 11, and May 18, 2021, at which time all interested parties were given an opportunity to be heard and to present evidence, considered multiple land plans for the purpose of identifying housing sites throughout the City that would accommodate the City's RHNA; and

WHEREAS, the City Council at its duly noticed public meeting on June 15, 2021 approved a draft land use plan that identified housing sites that can accommodate the City's RHNA and other land use changes and adjustments to some commercial, industrial, and public institutional designations; and

WHEREAS, the City Council held a duly noticed public hearing on July 5th, 2022, at which time it considered evidence presented by staff, the consultant, and other interested parties and adopted the revised City of Redondo Beach 6th Cycle 2021-2029 Housing Element, incorporating the amendments recommended by the California Department of Housing and Community Development (HCD) and submitted the revised Housing Element to HCD on July 11, 2022; and

WHEREAS, on September 1, 2022, the City received a letter from HCD certifying the City of Redondo Beach's 6th Cycle Housing Element; and

WHEREAS, the City's Draft General Plan Land Use Element is consistent with, supports, and serves to implement the City's certified 6th Cycle 2021-2029 Housing Element; and

WHEREAS, the associated updates to the City's Zoning Ordinances and Local Coastal Program (LCP) required for consistency with the General Plan are also consistent with, support, and serve to implement the City's Housing Element inclusive of the "Housing Sites" and "Housing Programs", and also serve to update the City's Zoning Ordinances and LCP consistent with State Housing Laws; and

WHEREAS, on June 20, August 1, and August 15, 2024 the Planning Commission held multiple duly-noticed public hearings to take testimony from staff, the public and other interested parties, and to deliberate on updates to the City's General Plan Land Use, Open Space & Conservation, Noise, and Safety Element, and revisions to the City's Zoning Ordinances and LCP required for consistency and to implement the City's Housing Element; and

WHEREAS, on September 19, 2024 the Planning Commission held a final duly noticed public hearing and completed its deliberations on updates to the City's General Plan Land Use, Open Space & Conservation, Noise, and Safety Elements, and updates to the City's Zoning Ordinances and LCP required for consistency with and to implement the City's Housing Element, and took testimony from staff, the public and other interested parties, and considered the associated Draft Program Environmental Impact Report and made the following recommendations:

1. That the City Council certify, pursuant to CEQA, the Final Program Environmental Impact Report inclusive of its referenced appendices for the "Redondo Beach Focused General Plan Update, Zoning Ordinance Updates and Local Program Amendments", approve appropriate findings, a statement of overriding considerations, and mitigation monitoring and reporting program; and
2. That the City Council adopt a General Plan Amendment to update the City's Land Use, Open Space and Conservation, Noise, and Safety Elements with certain proposed changes and edits as set forth in Planning Commission Resolution No. 2024-09-PCR-09; and

3. That the City Council adopt amendments to the Redondo Beach Municipal Code, Title 10, Planning and Zoning, Chapter 1, Subdivisions, Chapter 2 Zoning and Land Use, Chapter 5 Coastal Land Use Plan Implementing Ordinance to make consistent the General Plan Update and to implement the 6th Cycle 2021-2029 Housing Element inclusive of the zoning amendments for implementing "Housing Sites" and "Housing Programs"; and
4. That the City Council adopt amendments to the City of Redondo Beach's Coastal Land Use Plan of the Local Coastal Program to make consistent the General Plan Update and to implement the 6th Cycle 2021-2029 Housing Element inclusive of the zoning amendments for implementing "Housing Sites" and "Housing Programs";

WHEREAS, pursuant to CEQA, a Draft Program Environmental Impact Report (Draft PEIR) has been prepared and was presented to the Planning Commission at the same time as the final draft of the General Plan Update, Zoning Ordinance Amendments, Zoning Ordinance for the Coastal Zone Amendments, and Local Coastal Program Amendments; and

WHEREAS, the overall purpose of the PEIR is to inform the City, responsible agencies, decision makers, and the public about the potential environmental effects resulting from full implementation of the proposed Redondo Beach General Plan Update, and the associated Zoning Ordinance, Zoning Ordinance for the Coastal Zone, and Local Coastal Program amendments that are required for consistency purposes and to implement the City's certified 6th Cycle 2021-2029 Housing Element; and

WHEREAS, the PEIR addresses effects that may be significant and adverse; evaluates alternatives to the project; and identifies mitigation measures and alternatives to reduce or avoid identified potentially significant impacts; and

WHEREAS, included as an appendix to the PEIR, Appendix A Buildout Methodology, explains the buildout assumptions and methodologies utilized for projecting the potential growth in the City over the next 25 years to the horizon year of the General Plan Update of 2050; and

WHEREAS, on August 1, 2024 an "Amended Notice of Availability of a Draft Environmental Impact Report" was issued to advise the public and interested parties that the City of Redondo Beach Planning Division had released the Draft PEIR addressing potential impacts associated with the Redondo Beach Focused General Plan Update, Zoning Ordinance Update and Local Coastal Program Amendment (proposed project) for a 47-day review period beginning on August 1, 2024, and ending on September 16, 2024; and

WHEREAS, the City timely received 18 written comments on the Draft PEIR; and

WHEREAS, all comments timely received on the Draft PEIR have been responded to and are included in the Final PEIR, which consists of the Draft EIR, responses to

comments timely received on the Draft PEIR, and clarifications/revisions to the Draft EIR; and

WHEREAS, on October 1, 15, and 29, 2024, and November 5, 2024, the City Council, at duly noticed public hearings, considered the Project and the Draft and Final PEIR, at which times the City staff presented its reports and interested persons had an opportunity to be heard and to present evidence regarding the Project and the Final PEIR; and

WHEREAS, multiple technical studies, environmental scoping meetings, community surveys, public meetings and workshops with the GPAC, the general public, the Planning Commission, and the City Council since 2016 have all served to engage and inform the general public including residents, business owners/operators, and other interested parties and have shaped the resulting draft General Plan Update, and the associated Zoning Ordinance, Zoning Ordinance for the Coastal Zone, and LCP amendments required for consistency and implementing the Housing Element.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF REDONDO BEACH DOES HEREBY FIND AS FOLLOWS:

1. That the City of Redondo Beach (City) has initiated a General Plan Amendment updating five of the State-required elements that make up the General Plan: the Land Use, Open Space and Conservation, Safety, and Noise elements. Updates to these elements will be accompanied by associated revisions to the City's Zoning Code and Local Coastal Program needed to make consistent and implement the updated goals and policies and also serve to implement the City's 6th Cycle Housing Element (previously defined as the Project).

2. That the Project was processed, including but not limited to all public notices, in the time and manner prescribed by State and local law, including CEQA and the State CEQA Guidelines (CEQA Guidelines) (14. Cal. Code Regs. § 15000 *et seq.*)

3. That pursuant to CEQA, the City is the lead agency for the Project because it is the public agency with the authority and principal responsibility for reviewing, considering, and potentially approving the proposed Project.

4. That the City determined a PEIR would be required for the proposed Project and issued a NOP on June 1, 2023. The NOP was sent to the State Clearinghouse, responsible agencies, trustee agencies, and interested parties. The purpose of the NOP was to receive comments and input from interested public agencies and private parties on issues to be addressed in the PEIR for the Project.

5. That in accordance with CEQA Guidelines Section 15082(c)(1), a scoping meeting was held on June 8, 2023. The purpose of the meetings was to solicit additional suggestions on the scope of the Draft PEIR.

6. That the scope of the Draft PEIR was determined based on the NOP, comments received in response to the NOP, and technical input from environmental consultants.

7. That the City contracted for the independent preparation of a Draft PEIR for the Project, including preparation and review, as applicable, of all necessary technical studies and reports in support of the Draft PEIR. The PEIR is a Program EIR, as defined under CEQA Guidelines Section 15168. As such, and in accordance with CEQA and the CEQA Guidelines, the PEIR analyzes the Project's potential impacts on the environment, potential mitigation, and potential alternatives to the Project. However, the Project will not involve the construction of any particular development project or infrastructure improvement. Therefore, in the absence of more detailed information regarding future development projects that may be proposed, the PEIR does not evaluate detailed, site-specific, and/or project-specific impacts associated with the development of individual parcels that would be regulated by the Project. Instead, the PEIR identifies the general and cumulative impacts of future development that could occur in the Project area.

8. That upon completion of the Draft PEIR in August 2024, the City initiated a public comment period by preparing and sending a Notice of Availability (NOA) for the Draft PEIR to all interested persons, agencies, and organizations; the NOA also was published in the Easy Reader; and were made available at the Redondo Beach Main Library and Redondo Beach North Branch Library. The City also filed a Notice of Completion (NOC) with the State Office of Land Use and Climate Innovation. The Draft PEIR was made available for a 47-day public review period beginning on August 1, 2024 and ending on September 16, 2024.

9. That copies of the Draft PEIR were sent to various public agencies, as well as to organizations and individuals requesting copies. In addition, copies of the documents have been available for public review and inspection at the Redondo Beach City Hall and the Redondo Beach Main Library and Redondo Beach North Branch Library. The Draft PEIR was also made available for download via the City's website: www.redondo.org/depts/community_development/planredondo/default.asp

10. That in response to the Draft PEIR, 18 written comments were timely received. In compliance with CEQA Guidelines Section 15088, the City prepared written responses to all comments that were timely received on the Draft PEIR. None of the comments presented any new significant environmental impacts or otherwise constituted significant new information requiring recirculation of the Draft PEIR pursuant to CEQA Guidelines Section 15088.5.

11. That the Final PEIR, which is on file with the City Clerk, is incorporated herein by this reference. The Final PEIR consists of the comments and responses to comments on the Draft PEIR, and clarifications/revisions to the Draft PEIR. The Final PEIR was made available to the public and provided to all commenting agencies on October 17, 2024, at least 10 days prior to certification of the Final PEIR, in compliance with Public Resources Code Section 21092.5(a).

12. That on September 19, 2024, the Planning Commission considered the Project and approved Planning Commission Resolution 2024-09-PCR-09, recommending the City Council certify the Final Program Environmental Impact Report, inclusive of its

referenced appendices for the "Redondo Beach Focused General Plan Update, Zoning Ordinance Update and Local Coastal Program Amendment", and approve appropriate Environmental Findings, a Statement of Overriding Considerations, and a Mitigation Monitoring and Reporting Program, adopt a General Plan Amendment to Update the City's Land Use, Open Space and Conservation, Noise, and Safety Elements, adopt amendments to the Redondo Beach Municipal Code, Title 10 Planning and Zoning, Chapter 1 Subdivisions, Chapter 2 Zoning and Land Use, and Chapter 5 Coastal Land Use Plan Implementing Ordinance, and adopt amendments to the City of Redondo Beach's Coastal Land Use Plan of the Local Coastal Program all of which serve to implement the City's 6th Cycle Housing Element.

13. That on October 1, and 15, 2024, the City Council, at duly noticed public hearings, considered the Project and the Draft PEIR, at which time the City staff presented its report and interested persons had an opportunity to be heard and to present evidence regarding the Project and the Draft PEIR.

14. That on October 29, and November 5, 2024, the City Council, at duly noticed public hearings, again considered the Project and also the Final PEIR, at which time the City staff presented its report and interested persons had an opportunity to be heard and to present evidence regarding the Project and the Final PEIR.

15. That Section 15091 of the CEQA Guidelines requires that a public agency, before approving a project for which a PEIR is required, make one or more of the following written finding(s) for each significant effect identified in the PEIR accompanied by a brief explanation of the rationale for each finding:

    a. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the Final PEIR; or,

    b. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency; or,

    c. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final PEIR.

16. That these required written findings are set forth in Exhibit A, attached hereto and incorporated herein by reference as if set forth in full, and are hereby adopted.

    a. Environmental impacts determined to have no impact or a less than significant impact without mitigation are described in Section III B of Exhibit A.

    b. Environmental impacts determined in the PEIR to be less than significant with mitigation are described in Section III C of Exhibit A.

c. Environmental impacts that remain significant and unavoidable despite the imposition of all feasible mitigation are described in Section III D of Exhibit A.

d. Alternatives that might eliminate or reduce significant environmental impacts are described in Section IV of Exhibit A.

17. That CEQA Guidelines Section 15093 requires that if a project will cause significant unavoidable adverse impacts, the public agency must adopt a Statement of Overriding Considerations prior to approving the project. A Statement of Overriding Considerations states that any significant adverse project effects are acceptable if expected project benefits outweigh unavoidable adverse environmental impacts. The Statement of Overriding Considerations is included in the findings in Section VII of Exhibit A, and is incorporated herein by reference as if set forth in full, and is hereby adopted.

18. That CEQA Section 21081.6 requires the City to prepare and adopt a Mitigation Monitoring and Reporting Program for any project for which mitigation measures have been imposed to ensure compliance with the adopted mitigation measures. The Mitigation Monitoring and Reporting Program is attached to the Final PEIR as Appendix C, and in this Resolution as Exhibit B, and is herein incorporated by reference as if set forth in full, and is hereby adopted.

19. That prior to taking action, the City Council has heard, been presented with, reviewed, and considered the information and data in the administrative record, including the Final PEIR, the written and oral comments on the Draft PEIR and Final PEIR, responses to comments, staff reports and presentations, and all oral and written testimony presented during the public hearing on the proposed Project.

20. That the City Clerk of the City of Redondo Beach is the custodian of records, and the documents and other materials that constitute the record of proceedings upon which this decision is based are located at the Office of the City Clerk, City of Redondo Beach, 415 Diamond Street, Redondo Beach, CA.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF REDONDO BEACH, CALIFORNIA, DOES RESOLVE AS FOLLOWS:

SECTION 1. That the above recitals and findings are true and correct, and are incorporated herein by reference as if set forth in full.

SECTION 2. That agencies and interested members of the public have been afforded ample notice and opportunity to comment on the Final PEIR and the proposed Project.

SECTION 3. That the City Council has independently considered the administrative record before it, which is hereby incorporated by reference and which includes the Final PEIR, the written and oral comments on the Draft PEIR, staff reports and responses to comments incorporated into the Final PEIR, and all testimony related to environmental issues regarding the proposed Project.

SECTION 4. That the Final PEIR fully analyzes and discloses the potential impacts of the proposed Project, and that those impacts have been mitigated or avoided to the extent feasible for the reasons set forth in the Findings attached as Exhibit A and incorporated herein by reference, with the exception of those impacts found to be significant and unmitigable as discussed therein.

SECTION 5. That the Final PEIR reflects the independent judgment of the City Council. The City Council further finds that the additional information provided in the staff reports, the minor edits recommended by staff or the Planning Commission, in comments on the Draft PEIR, the responses to comments on the Draft PEIR, and the evidence presented in written and oral testimony does not constitute new information requiring recirculation of the PEIR under CEQA. None of the information presented has deprived the public of a meaningful opportunity to comment upon a substantial environmental impact of the proposed Project or a feasible mitigation measure or alternative that the City has declined to implement.

SECTION 6. That the City Council certify the Final PEIR as being in compliance with CEQA. That the City Council further adopts the Findings pursuant to CEQA and the Statement of Overriding Considerations as set forth in Exhibits A, respectively, and adopts the Mitigation Monitoring and Reporting Program attached as Exhibit B. That the City Council further determines that all of the findings made in this Resolution (including Exhibit A) are based upon the information and evidence set forth in the Final PEIR and upon other substantial evidence that has been presented at the hearing before the City Council, and in the record of the proceedings. That the City Council further finds that each of the overriding benefits stated in Exhibit A, by itself, would individually justify proceeding with the proposed Project despite any significant unavoidable impacts identified in the Final PEIR or alleged in the record of proceedings.

SECTION 7. That the City Council hereby directs City staff to implement and to monitor the mitigation measures as described in Exhibit B.

SECTION 8. The City Council hereby directs staff to file a Notice of Determination as set forth in Public Resources Code Section 21152.

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PASSED, APPROVED AND ADOPTED this 5th day of November, 2024.

_____
James A. Light, Mayor

APPROVED AS TO FORM:

_____
Michael W. Webb, City Attorney

ATTEST:

_____
Eleanor Manzano, CMC, City Clerk

# CERTIFICATION

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

I, Eleanor Manzano, City Clerk of the City of Redondo Beach, California, do hereby certify that Resolution No. CC-2410-105 was passed and adopted by the City Council of the City of Redondo Beach, California, at a regular meeting of said City Council held on the 5th day of November, 2024, and there after signed and approved by the Mayor and attested by the City Clerk, and that said resolution was adopted by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

_____

Eleanor Manzano, CMC
City Clerk

RESOLUTION NO. CC-2410-105
A RESOLUTION OF THE CITY COUNCIL OF REDONDO BEACH, CALIFORNIA, CERTIFYING THE FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT (STATE CLEARINGHOUSE NUMBER 2023050732), ADOPTING FINDINGS PURSUANT TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT, ADOPTING A STATEMENT OF OVERRIDING CONSIDERATIONS, AND ADOPTING A MITIGATION MONITORING AND REPORTING PROGRAM FOR THE REDONDO BEACH FOCUSED GENERAL PLAN UPDATE, ZONING ORDINANCE UPDATE AND LOCAL COASTAL PROGRAM AMENDMENT

"EXHIBIT A"

**CEQA FINDINGS OF FACT AND STATEMENT OF OVERRIDING CONSIDERATIONS**

**REGARDING THE FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT FOR THE REDONDO BEACH FOCUSED GENERAL PLAN UPDATE, ZONING ORDINANCE UPDATES, AND LOCAL COASTAL PROGRAM AMENDMENT STATE CLEARINGHOUSE NO. 2023050732**

## I. SUMMARY OF FINDINGS

The City Council hereby finds that it has been presented with the Program Environmental Impact Report (PEIR) for the proposed Redondo Beach Focused General Plan Update, Zoning Ordinance Updates, and Local Coastal Program Amendment (proposed project), which it has reviewed and considered, and further finds that the PEIR is an accurate and objective statement that has been completed in full compliance with the California Environmental Quality Act (CEQA) and the State CEQA Guidelines. The City Council finds that the PEIR reflects the independent judgment and analysis of the City. The City Council declares that no evidence of new significant impacts or any new information of "substantial importance," as defined by State CEQA Guidelines Section 15088.5, has been received by the City after circulation of the Draft PEIR that would require recirculation. Therefore, the City Council hereby certifies the PEIR based on the entirety of the record of proceedings, as further set forth in the accompanying resolution.

## II. PROCEDURAL COMPLIANCE WITH CALIFORNIA ENVIRONMENTAL QUALITY ACT

The PEIR has been prepared in accordance with CEQA and the CEQA Guidelines, as amended. As authorized in State CEQA Guidelines Section 15084(d)(2), the City retained a consultant (PlaceWorks) to assist with the preparation of the environmental documents. City staff from multiple departments, representing the lead agency, have directed, reviewed, and modified where appropriate all material prepared by the consultant. The PEIR reflects the City's independent analysis and judgement. The key milestones for preparation of the PEIR are summarized below. An extensive public involvement and agency notification effort was conducted to solicit input on the scope and content of the PEIR and to solicit comments on the results of the environmental analysis presented in the Draft PEIR.

### A. PUBLIC NOTIFICATION AND OUTREACH

In conformance with CEQA, the State CEQA Guidelines, and the City of Redondo Beach CEQA Guidelines the City of Redondo Beach conducted an extensive environmental review of the proposed project.

- A Notice of Preparation (NOP) was circulated on June 1, 2023, to state, regional, and local agencies, organizations, and individuals. Copies of the NOP were made available for public review at the City of Redondo Beach, the City's website, the Governor's office of Planning and Research (OPR) State Clearinghouse website (CEQAnet) and the Los Angeles County Clerk website. Additionally, the NOP was advertised in the local newspaper, the Easy Reader.

- A scoping meeting was held on June 8, 2023, from 6:00 PM to 8:00 PM at Redondo Beach Main Library, Second Floor Conference Room, 303 N. Pacific Coast Highway, Redondo Beach, CA 90277. The notice of a public scoping meeting was included in the NOP.

- Seven agencies and 14 individuals responded to the NOP. (see Chapter 2, *Introduction*, Table 2-, *Summary of Comments on the Notice of Preparation*, of the Draft PEIR). Based on the scoping process, the primary areas of controversy known to the City include:

    - Zone changes to property on which Beach Cities Health District (BCHD) is located (See Section 3, *Project Description,* of the Draft PEIR)

    - Changes to floor area ratio (FAR) for Public Institutional (PI) land use and zoning designations (See Section 3, *Project Description*, of the Draft PEIR)

- The Draft PEIR was made available for a 47-day public review period beginning August 1, 2024, and ending September 16, 2024. The scope of the Draft PEIR was determined based on the CEQA Guidelines Appendix G Checklist, comments received in response to the NOP, and comments received at the scoping meeting. Chapter 5, *Environmental Analysis*, of the Draft PEIR describes the issues identified for analysis in the Draft PEIR. The Notice of Availability (NOA) for the Draft PEIR was made available for public review at the City of Redondo Beach, the City's website, OPR State Clearinghouse website (CEQAnet) and the Los Angeles County Clerk website. Additionally, the NOP was advertised in the local newspaper, the Easy Reader.

- The Final PEIR, including responses to comments, was released for a minimum 10-day agency review period on October 17, 2024 through October 27, 2024, prior to certification of the Final PEIR.

- Public hearings on the Draft PEIR included a Planning Commission hearing on September 19, 2024, and two City Council hearings on October 15 and 29, 2024.

- In summary, the City conducted all required noticing and scoping for the proposed project in accordance with Section 15083 of the CEQA Guidelines, and conducted the public review for the Draft PEIR, which exceeded the requirements of Section 15087 of the CEQA Guidelines.

## B. FINAL ENVIRONMENTAL IMPACT REPORT AND CITY COUNCIL PROCEEDINGS

The City prepared a Final PEIR, including responses to comments on the Draft PEIR. The Final PEIR contains comments on the Draft PEIR, responses to those comments, revisions to the Draft PEIR, and appended documents. A total of 18 comment letters were received. Of the 18 comment letters, 11 letters were from public agencies, tribes, and/or organizations, and 7 letters were from individuals.

The Final PEIR found that prior to mitigation, implementation of the proposed project would result in potentially significant impacts to Cultural Resources (Impacts 5.4-1 and 5.4-2), Geology and Soils, and Tribal Cultural Resources. However, mitigation measures were developed to avoid or reduce all of these impacts to levels considered less than significant. The Final PEIR also found that despite the implementation of recommended mitigation measures, impacts to Air Quality, Biological Resources,

Cultural Resources (Impact 5.4-1), GHG Emissions, Land Use and Planning, Noise, Population and Housing, and Transportation were significant and unavoidable. A Statement of Overriding Considerations was prepared for the Council's consideration.

Members of the public can view searchable agendas for scheduled City Council meetings and access agenda-related City information and services directly on the following website: https://www.redondo.org/government/mayor_and_city_council/index.php.

The Final PEIR document was posted for viewing and download with the previously posted Draft PEIR prior to the City's consideration of the Final PEIR and project recommendations on the City's website.

A date for consideration of the Final PEIR and project recommendations at the City Council was set for the proposed project, and notice of the meeting was provided consistent with the Brown Act (Government Code Sections 54950 et seq.).

## C. RECORD OF PROCEEDINGS

For purposes of CEQA and these Findings, the Record of Proceedings for the proposed project consists of, at a minimum, the following documents and other evidence:

- The NOP, NOA, and all other public notices issued by the City in conjunction with the proposed project.
- The Draft PEIR and Final PEIR for the proposed project.
- All written comments submitted by agencies or members of the public during the public review comment period on the Draft PEIR.
- All responses to written comments submitted by agencies or members of the public during the public review comment period on the Draft PEIR.
- All written and verbal public testimony presented during a noticed public hearing for the proposed project.
- The Mitigation Monitoring and Reporting Program.
- The Statement of Overriding Considerations.
- The reports and technical memoranda included or referenced in the Final PEIR.
- All documents, studies, EIRs, or other materials incorporated by reference in the Draft PEIR and Final PEIR.
- The Resolutions and Ordinances adopted by the City in connection with the proposed project, and all documents incorporated by reference therein.

- Matters of common knowledge to the City, including but not limited to federal, state, and local laws and regulations.

- Any documents expressly cited in these Findings.

- Any other relevant materials required to be in the record of proceedings by Public Resources Code Section 21167.6(e).

## D. CUSTODIAN AND LOCATION OF RECORDS

The documents and other materials that constitute the administrative record for the City's actions related to the proposed project are available at the City Clerk's Office, 415 Diamond Street, Redondo Beach, CA 90277. The City Planning Division is the custodian of the administrative record for the project. Copies of these documents, which constitute the record of proceedings, are and at all relevant times have been and will be available upon request at the offices of the Planning Division within the City's Community Development Department. This information is provided in compliance with Public Resources Code Section 21081.6(a)(2) and Guidelines Section 15091(e).

## E. PROJECT DESCRIPTION

The proposed project is an update of the Redondo Beach General Plan, Zoning Ordinance and Zoning Ordinance for the Coastal Zone, and Local Coastal Program (proposed project). The update includes the following chapters as individual elements that address all the required topics in state law:

- Land Use Element
- Open Space and Conservation Element
- Safety Element
- Noise Element

Implementation of the proposed project would result in significant and unavoidable impacts to Air Quality, Cultural Resources(Impacts 5.4-1 and 5.4-2), Energy, Greenhouse Gas Emissions, Land Use and Planning, Noise, Population and Housing, and Transportation.

## F. PROJECT OBJECTIVES

The City of Redondo Beach's vision and guiding principles for the proposed project prioritize quality of life, community character, health and vitality, and sustainable growth. Objectives of the proposed project are as follows:

1. Foster development of a variety of housing options citywide that accommodates the lifestyles and affordability needs of all residents, while meeting the State-mandated Regional Housing Needs Allocation (RHNA) requirements for the City's Sixth Cycle Housing Element.

2. Reduce automobile traffic volume and congestion by promoting safe, efficient, multimodal transportation that provides alternatives to the car.

3. Ensure that the City is both a place to live and work by matching its residents to jobs and promoting a workforce/jobs balance.

4. Protect and enhance the City's existing Aerospace Industry and economic identity.

5. Support resident's health and vitality through the preservation and expansion of public open space for active and passive recreation throughout the City.

6. Create more walkable and bike friendly interconnected neighborhoods through the development of new parks, trails, and sports facilities.

7. Promote creativity, innovation, and technological advances to attract businesses that are on the cutting edge of their industries.

8. Create unique destinations for residents, employers, and visitors, while maintaining existing neighborhoods and preserving public space.

9. Balance City growth in an environmentally, sustainably, economically, and fiscally responsible way.

# III. CALIFORNIA ENVIRONMENTAL QUALITY ACT FINDINGS

## A. INTRODUCTION

CEQA requires that a number of written findings be made by the lead agency in connection with certification of an EIR prior to approval of the project, pursuant to Sections 15091 and 15093 of the CEQA Guidelines and Section 21081 of the Public Resources Code. This document provides the findings required by CEQA. The potential environmental effects of the proposed project have been analyzed in a Draft PEIR (State Clearinghouse [SCH] 2023050732). A Final PEIR (Final PEIR) has also been prepared that incorporates the Draft PEIR and comments received on the Draft PEIR; responses to the individual comments; revisions to the Draft PEIR, including any clarifications based on the comments and the responses to the comments; and the Mitigation Monitoring and Reporting Program (MMRP) for the proposed project. This document provides the findings required by CEQA for approval of the proposed project.

### Statutory Requirements for Findings

CEQA (Pub. Res. Code Section 21000 et seq.) and the State CEQA Guidelines (14 Ca. Code Regs Section 15000 et seq.) require that the environmental impacts of a project be examined before a project is approved. Specifically, regarding findings, Guidelines Section 15091 states:

> (a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:
>
> 1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.

2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

(b) The findings required by subsection (a) shall be supported by substantial evidence in the record.

(c) The finding in subdivision (a)(2) shall not be made if the agency making the finding has concurrent jurisdiction with another agency to deal with identified feasible mitigation measures or alternatives. The finding in subsection (a)(3) shall describe the specific reasons for rejecting identified mitigation measures and project alternatives.

(d) When making the findings required in subdivision (a)(1), the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures.

(e) The public agency shall specify the location and custodian of the documents or other material which constitute the record of the proceedings upon which its decision is based.

(f) A statement made pursuant to Section 15093 does not substitute for the findings required by this section.

The "changes or alterations" referred to in Section 15091(a)(1) that are required in or incorporated into the project to mitigate or avoid the significant environmental effects of the project may include a wide variety of measures or actions, as set forth in Guidelines Section 15370, including:

(a) Avoiding the impact altogether by not taking a certain action or parts of an action.

(b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.

(c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.

(d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.

(e) Compensating for the impact by replacing or providing substitute resources or environments, including through permanent protection of such resources in the form of conservation easements.

Section 21002 requires an agency to "avoid or substantially lessen" significant adverse environmental impacts. Thus, mitigation measures that "substantially lessen" significant environmental impacts—even if they cannot completely avoid those impacts—satisfy section 21002's mandate.

"CEQA does not mandate the choice of the environmentally best feasible project if through the imposition of feasible mitigation measures alone the appropriate public agency has reduced environmental damage from a project to an acceptable level." *Laurel Hills Homeowners Assn. v. City Council* (1978) 83 Cal.App.3d 515, 521.

"There is no requirement that adverse impacts of a project be avoided completely or reduced to a level of insignificance . . . if such would render the project unfeasible." *Las Virgenes Homeowners Fed., Inc. v. County of Los Angeles* (1986) 177 Cal. App. 3d 300, 309.

While CEQA requires that lead agencies adopt feasible mitigation measures or alternatives to substantially lessen or avoid significant environmental impacts, an agency need not adopt infeasible mitigation measures or alternatives. If "economic, social, or other conditions make it infeasible to mitigate one or more significant effects on the environment of a project, the project may nonetheless be carried out or approved at the discretion of a public agency" (Pub. Res. Code, Section 21002.1(c)); also, an "EIR is not required to consider alternatives which are infeasible" (Guidelines, Section 15126.6(a)).

CEQA defines "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors" (Pub. Res. Code, Section 21061.1). The State CEQA Guidelines add "legal" considerations as another indicia of feasibility (Section 15364). Project objectives also inform the determination of feasibility. *Jones v. U.C. Regents* (2010) 183 Cal. App. 4th 818, 828–829.

"'[F]easibility' under CEQA encompasses 'desirability' to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors." *City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 417.

"Broader considerations of policy thus come into play when the decision making body is considering actual feasibility." *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 715; *Cal. Native Plant Soc'y v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 1000.

"[E]conomic, legal, social, technological, or other considerations" may justify rejecting mitigation and alternatives as infeasible. (Pub. Res. Code, Section 21081(a)(3)).

Environmental impacts that are less than significant do not require the imposition of mitigation measures. *Leonoff v. Monterey County Board of Supervisors* (1990) 222 Cal.App.3d 1337, 1347.

The California Supreme Court has stated, "The wisdom of approving . . . any development project, a delicate task which requires a balancing of interests, is necessarily left to the sound discretion of the

local officials and their constituents who are responsible for such decisions. The law as we interpret and apply it simply requires that those decisions be informed, and therefore balanced." *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 576. In addition, perfection in a project or a project's environmental alternatives is not required; rather, the requirement is that sufficient information be produced "to permit a reasonable choice of alternatives so far as environmental aspects are concerned." Outside agencies (including courts) are not to "impose unreasonable extremes or to interject [themselves] within the area of discretion as to the choice of the action to be taken." *Residents Ad Hoc Stadium Com. v. Board of Trustees* (1979) 89 Cal.App.3d 274, 287.

## Findings of Fact

Having received, reviewed, and considered the PEIR for the State Clearinghouse No. 2023050732, as well as other information in the record of proceedings on this matter, the Redondo Beach City Council adopts the following Findings of Fact in its capacity as the legislative body for the City of Redondo Beach, which is the CEQA lead agency. The Findings establish the environmental and other bases for current and subsequent discretionary actions to be undertaken by the City and responsible agencies for the implementation of the proposed project.

In addition, the Redondo Beach City Council hereby make findings pursuant to and in accordance with Section 21081 of the California Public Resources Code and State CEQA Guidelines Sections 15090 and 15091 and hereby certifies that:

(1) Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant environmental effect as identified in the final EIR.

(2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

(3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

## Program Environmental Report and Discretionary Actions

The PEIR addresses the direct, indirect, and cumulative environmental effects of construction and operation activities associated with the proposed project. The PEIR provides the environmental information necessary for the City to make a final decision on the requested discretionary actions for all phases of this project. The PEIR serves as the first-tier environmental analysis and encourages future projects to reuse data (through tiering) for a more streamlined process to support discretionary reviews and decisions by other responsible agencies.

Discretionary actions to be considered by the City may include, but are not limited to:

- Certification of the Redondo Beach Focused General Plan Update, Zoning Ordinance Update, and Local Coastal Program Amendment Program Environmental Impact Report (SCH No. 2023050732)
- Adoption of the Redondo Beach General Plan Update
- Adoption of the Findings of Fact and Statement of Overriding Considerations
- Adoption of the Mitigation Monitoring Program, finding that the MMRP is adequately designed to ensure compliance with the mitigation measures during project implementation; and determine that the significant adverse effects of the project either have been reduced to an acceptable level, or are outweighed by the specific overriding considerations of the project as outlined in this CEQA Findings of Fact
- Adoption of any ordinances, guidelines, programs, actions, or other mechanisms that implement the Redondo Beach General Plan Update

## Format

Section 15091 of the CEQA Guidelines requires that a lead agency make a finding for each significant effect for the project. This section summarizes the significant environmental impacts of the project, describes how these impacts are to be mitigated, and discusses various alternatives to the proposed project, which were developed in an effort to reduce the remaining significant environmental impacts. All impacts are considered potentially significant prior to mitigation unless otherwise stated in the findings.

This section is divided into the following subsections:

**Section III B, Findings Regarding Environmental Impacts Not Requiring Mitigation,** presents topical areas that would result in no impact or less than significant impacts in the Draft PEIR.

**Section III C, Findings on Significant Environmental Impacts That Can Be Reduced to Less Than Significant,** presents significant impacts of the proposed project that were identified in the Draft PEIR, the mitigation measures identified in the MMRP, and the rationales for the findings.

**Section III D, Significant Unavoidable Impacts That Cannot Be Mitigated to Below the Level of Significance,** presents significant unavoidable impacts of the proposed project that were identified in the Draft PEIR, the mitigation measures identified in the MMRP, and the rationales for the findings.

**Section IV, Alternatives to the Proposed Project,** presents alternatives to the project and evaluates them in relation to the findings in Section 15091(a)(3) of the State CEQA Guidelines, which allows a public agency to approve a project that would result in one or more significant environmental effects if the project alternatives are found to be infeasible because of specific economic, social, or other considerations.

**Section V, Additional CEQA Considerations,** presents additional CEQA considerations, including significant irreversible changes due to the proposed project and growth-inducing impacts of the proposed project.

**Section VI, Findings on Responses to Comments on the Draft PEIR and Revisions to the Final PEIR,** presents the City's findings on the responses to comments and revisions to Final PEIR, and whether a recirculated Draft PEIR is necessary.

**Section VII, Statement of Overriding Considerations,** presents a description of the proposed project's significant and unavoidable adverse impacts and the justification for adopting a statement of overriding consideration.

**Section VIII, Mitigation Monitoring Reporting Program,** presents the Mitigation Monitoring and Reporting Program.

**Section IX, Certification,** identifies the requirements for certification of the EIR.

## B. FINDINGS REGARDING ENVIRONMENTAL IMPACTS NOT REQUIRING MITIGATION

### Issues Deemed No Impact or Less Than Significant Impact

Pursuant to CEQA Guidelines Section 15060(d) and 15063, which allow a lead agency to skip preparation of an Initial Study and begin work directly on the EIR process, an NOP was issued for the proposed project without an accompanying Initial Study.

### Findings on "No Impact" and "Less Than Significant Impacts"

Based on the environmental assessments in the Final PEIR, the City determined that the proposed project would have no impact or less than significant impacts, including direct, indirect, and cumulative impacts, for the environmental issues summarized below. The rationale for the conclusion that no significant impact would occur in each of the issue areas is based on the environmental evaluation in the listed topical EIR sections in Chapter 5 of the Draft PEIR, which include Environmental Setting, Environmental Impacts, and Mitigation Measures.

The Draft PEIR concluded that all or some of the impacts of the proposed project with respect to the following issues either will not be significant or will be reduced to below a level of significance by implementing project design features or existing plans, programs, and policies detailed in Chapter 5 of the Draft PEIR. Those issues include the following topical areas in their entirety or portions thereof: Aesthetics, Air Quality, Biological Resources, Cultural Resources(Impact 5.4-3), Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning (Impact 5.10-1), Noise, Population and Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, and Utilities and Service Systems. CEQA Guidelines Section 15901 requires that an EIR not be certified for a project which has one or more significant environmental effects unless one of three possible findings is made for each significant effect. Since the following environmental issue areas were determined to have no impact or a less than significant impact, no rationale for findings for these issues are required.

## 1. Aesthetics

**Impact 5.1-1: The proposed project would not alter the visual appearance or damage scenic vistas of the City of Redondo Beach. [Thresholds AE-1]**

Because of the hilly topography of the southern portion of the City and the inland location of the northern portion of the City, the beach and ocean can only be viewed from a limited geographic area of the community. Future development facilitated by the proposed project could alter the appearance of the existing conditions as changes under the proposed project would be primarily to existing buildings and the reuse of properties. Future development facilitated by the proposed project would not occur in protected open space areas, including beaches and coastal bluffs, and thus would not affect scenic vistas from associated vantage points. Development would primarily be located around housing element sites and planned projects, clustered within the residential overlay areas, integrated throughout the R-2 and R-3 zones, and located within major project areas like the South Bay Galleria (South Bay Social District), areas where the allowable floor area ratio was raised including the Artesia Boulevard and Aviation Boulevard Special Policy Areas (SPA) and areas designated as I-1 and I-3 in the proposed land use plan. Regulatory compliance with development standards under the City's Municipal Code, such as height and setback requirements, as well as the City's commercial and residential design standards and guidelines, would guide future development characteristics and ensure consistency and compatibility. Development standards and design guidelines would ensure that the visual appearance and existing scenic vistas in the City are not significantly adversely affected. The proposed General Plan update includes policies that would protect scenic resources, such as Policy LU-5.7, which calls for the preservation of open space that contains scenic value, and Policy LU-2.1, which aims to protect Redondo Beach culture preserving visual character and scenic value.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impacts relating to scenic resources within a state scenic highway. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.1-9)

**Impact 5.1-2: The proposed project would not alter scenic resources within a state scenic highway. [Threshold AE-2]**

There are no scenic highways within or near the City of Redondo Beach (Caltrans 2019). No eligible scenic highways run through the City limits. The nearest eligible scenic highway is along a segment of Highway 1 located approximately 10 miles north. Future development would not interfere with scenic resources within a state highway. The City's primary arterial corridors are SR-1, which runs generally north-south and crosses the southwestern part of the City, and I-405, a north-south freeway that passes through the northeast tip of the City. Additionally, SR-95 (Artesia Boulevard) which runs east-west through the northern region of the City and serves as north Redondo's major commercial corridor, is also not a scenic highway.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impacts relating to existing visual character and quality of public views and conflict with applicable zoning and other regulations governing scenic quality. Accordingly, no changes or alterations to the

proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.1-9)

**Impact 5.1-3: Buildout in accordance with the proposed land use plan would alter the existing visual appearance of the City but would not substantially degrade its existing visual character or quality and would not conflict with applicable zoning and other regulations governing scenic quality. [Threshold AE-3]**

The proposed project is a regulatory document that sets the framework for future growth and development in the City and does not directly result in development. The City of Redondo Beach is predominantly built out with very few vacant sites available to accommodate future land use changes, requiring the City to look at very select areas to accommodate new uses. As discussed in Chapter 3, *Project Description*, Table 3-6, *Summary of Special Policy Areas*, within the Draft FPEIR, seven special policy areas have been identified in the Land Use Element that warrant special policy direction due to the role they play in the City. Policies targeted to these areas ensure the preservation and enhancement of the special character of these areas. Land use changes to these areas would occur where development currently exists and primarily focuses on the reuse or repurpose of underutilized sites. Changes to these special policy areas would not occur in protected areas such as the beaches. As discussed in the Draft FPEIR Chapter 3, *Project Description,* the amendments to the Zoning Ordinance will codify the community's vision as established in the Focused General Plan Update process, facilitate the implementation of key General Plan concepts related to land use, and implement required Zoning Map changes and programs pursuant to the City's existing, Certified Housing Element. Table 3-7, *Summary of Zoning Map, Regulations and Standards Updates,* in Chapter 3, *Project Description*, of the Draft FPEIR summarizes the proposed amendments to the City's Zoning Map to align with the General Plan Update. Table 3-8 *Administrative and Procedural Zoning Ordinance Updates to Align with State Laws*, summarizes the Zoning Ordinance updates that are procedural, administrative, or required to formally align the City's Municipal Code with state laws that are already in effect followed by a summary of the required amendments to the Zoning Ordinance text. Furthermore, to implement the changes proposed by the Focused General Plan Update and the proposed Zoning Ordinance Update within the coastal zone, the City must also amend portions of both the Coastal Land Use Plan (LUP) and Implementation Plan (IP) of its Local Coastal Program (LCP). Proposed changes to the LUP include updates to the Coastal Land Use Map consistent with the Land Use Map in the Focused General Plan Update. Proposed changes to the IP will include updates to the Zoning Map within the Coastal Zone to implement the Focused General Plan Update and updates to the Zoning Ordinance for the Coastal Zone that largely mirror the changes described in the tables 3-7 and 3-8, above.

Because the City is predominantly built out, redevelopment of sites would have the potential to alter the visual appearance of the City, but the design standards and Objective Residential Standards set by the City will ensure redevelopment would remain consistent with community expectations and would not substantially degrade the City's visual character or quality.

The proposed General Plan policies would ensure that future development would preserve and enhance the City of Redondo Beach's visual character and quality, such as, Policy LU-2.2 which aims to establish that any new projects are consistent and compatible with existing design quality, Policy LU-3.5 which ensures new projects are consistent with provisions and design policies outlined by the

City, and Goal OS-3, would ensure that prominent public viewpoints and scenic vistas are preserved, maintained and enhanced for public enjoyment. Updates to the Zoning Code and LCP would involve land-use changes that would be consistent with the General Plan Update.

Moreover, any future development under the proposed General Plan would be required to comply with existing City regulations that maintain the City's character such as the City's development standards and commercial and residential design standards and guidelines. The development standards and design standards and guidelines would ensure that development under the proposed project would continue to be maintained and be compatible with the City's visual character. As such, impacts would be less than significant.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impacts relating to visual appearance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.1-11)

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**Impact 5.1-4: The proposed project would not generate additional light and glare. [Threshold AE-4]**

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The two major causes of light pollution are glare and spill light. Spill light is caused by misdirected light that illuminates outside the intended area. Glare is light that shines directly or is reflected from a surface into a viewer's eyes. Spill light and glare impacts are effects of a project's exterior lighting on adjoining uses and areas.

Sources of light in the City include building lighting (interior and exterior), security lighting, sign illumination, and parking area lighting. These sources of light and glare are mostly associated with the residential, commercial, and industrial uses in the City. Other sources of nighttime light and glare include streetlights, vehicular traffic along surrounding roadways, and ambient lighting from surrounding communities.

Future development in accordance with the proposed project would allow for the intensification and redevelopment of existing land uses, which could increase nighttime light and glare in the City. For instance, the conversion of underutilized or vacant areas into residential or commercial uses would introduce new sources of light from windows, porches, security, parking areas, and landscaping. However, since the City is predominantly built out, new development would largely occur within areas where development already exists. In addition, future development and redevelopment projects in the City would be required to comply with City Municipal Code Section 10-2.912, which requires that outdoor lighting be designed to not adversely impact surrounding uses but also provide a sufficient level of illumination. The Objective Residential Standards also set standards regarding lighting. These standards ensure that adequate site lighting is provided while minimizing spill light and glare into surrounding properties. Policy OS-3.5 would also ensure that glare impacts would be reduced by requiring outdoor fixtures be fully shielded to prevent lighting up the sky rather than the ground. This would ensure that substantial light and glare does not extend substantially beyond the site where it is generated. Development in accordance with the proposed project would not generate substantial additional light and glare and the impact would be less than significant.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impacts relating to light and glare. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.1-11)

## 2. Air Quality

**Impact 5.2-5: The proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. [Threshold AQ-4]**

Growth within the City under the General Plan Update could generate new sources of odors. Nuisance odors from land uses in the SoCAB are regulated under South Coast AQMD Rule 402, *Nuisance*, which states:

> A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause injury or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

### Industrial Land Uses

Compost facilities, landfills, solid-waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), asphalt batch manufacturing plants, chemical manufacturing, and food manufacturing facilities are typical sources of odors from industrial land uses. Industrial land uses are required to comply with South Coast AQMD Rule 402. As identified above, the General Plan Update could result in a net increase of 3,859,102 square feet in new industrial/warehousing in the City. Industrial land uses are required to comply with South Coast AQMD Rule 402 and future environmental review, which would ensure that sensitive land uses are not exposed to objectionable odors. Updates to the Zoning Ordinance and LCP would not involve industrial land-use changes greater than what is considered under the Focused General Plan Update, therefore no additional impacts would occur. Overall, impacts from potential odors generated from industrial land uses associated with the proposed project are considered less than significant.

### Residential and Other Retail/Commercial Land Uses

Residential and other nonresidential, nonindustrial land uses that would be accommodated by the proposed project could result in the generation of odors such as exhaust from landscaping equipment and from cooking/restaurants. Buildout of the General Plan Update would result in a net increase of commercial (1.8 million square feet) land uses (see Table 3-1, *Existing Land Use Summary*, and Table 3-4, *Summary of Existing and Proposed Land Uses*). However, unlike industrial land uses, these are not considered likely potential generators of odor that could affect a substantial number of people. Nuisance odors are regulated under South Coast AQMD Rule 402, which requires abatement of any nuisance generating a verified odor complaint. Therefore, impacts from potential odors generated from

residential and other nonresidential land uses associated with the proposed project are considered less than significant.

### Construction

During construction activities of development projects that would be accommodated by the proposed project, construction equipment exhaust and application of asphalt and architectural coatings would temporarily generate odors. Any construction-related odor emissions would be temporary and intermittent. Noxious odors would be confined to the immediate vicinity of the construction equipment in use. By the time such emissions reached any sensitive receptor sites, they would be diluted to well below any level of air quality concern. Short term construction-related odors are expected to cease upon the drying or hardening of odor-producing materials. Therefore, impacts associated with construction-generated odors are considered less than significant.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impacts relating to other emissions, such as those leading to odors. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.2-53)

## 3. Biological Resources

**Impact 5.3-1: The proposed project would not have a substantial adverse effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or United States Fish and Wildlife Service. [Threshold B-1]**

Future development in accordance with the proposed project could potentially impact special-status species.

### Plants

A search of the CNDDB database queries identified a total of 46 special-status plant species as occurring in the City of Redondo Beach. Artificial and unvegetated biological communities, barren and or urban areas in the City are unlikely to support special-status plants. However, construction activities within habitat communities could potentially result in significant impacts on special-status plants. As shown in Table 5.3-1, Sensitive Plant Species Potentially Present in City and Vicinity, there are nine federally and/or State-listed plant species known to occur in the City.

### Wildlife

As shown in Table 5.3-2, Sensitive Animal Species Potentially Present in City and Vicinity, a total of 102 special-status wildlife species known to occur or have the potential to occur in the City (i.e., 60 birds, 18 insects, 10 mammals, six reptiles three fish, 3 mollusks, one amphibian, and one crustacean). Of those, 12 birds, 3 fish, 2 mammals, 2 insects, and a crustacean species are listed or considered federal- and/or State-listed wildlife species known to occur in the City. Development within or near habitat for special-status wildlife species could result in adverse impacts on these species.

### Fish

Impacts on fish from construction-related disturbances include increased sedimentation and turbidity, release of contaminants into surrounding water bodies, noise disturbance, and change in fish habitat. A change in fish habitat could result from the removal of terrestrial vegetation from streambanks, removal of riparian trees and aquatic vegetation, or rip-rapping banks for erosion control. Increases in sedimentation and turbidity have been shown to affect fish physiology, behavior, and habitat. Stress responses are generally higher with increasing turbidity and decreasing particle size. Migrating adult salmonids have been reported to avoid high waterways with silt loads or cease migration when such loads are unavoidable (Cordone and Kelley 1961).

Future construction activities may also involve the storage, use, or discharge of toxic and other harmful substances near water bodies or in areas that drain to these water bodies. Heavy construction equipment often uses petroleum products, such as fuels, lubricants, hydraulic fluids, and coolants, all of which may be toxic to fish and other aquatic organisms. An accidental spill or inadvertent discharge of these materials could affect the water quality of the river or water body and thereby affect fish or fish habitat.

### Impact Significance Determination

The proposed project is a regulatory document that sets the framework for future growth and development in the City and does not directly result in development. Before any development or redevelopment activities would occur in the City, all such activities would be required to be analyzed for conformance with the General Plan, zoning requirements, and other applicable local, state, and federal requirements. Therefore, adoption of the proposed project in itself would not lead to the direct development or redevelopment of a specific project. Future development facilitated by the proposed project could impact special-status species. However, the General Plan Update contains several policies in the Land Use Element and the Open Space Element and Conservation Element that would preserve and enhance areas that may provide habitat for special-status species, including Policies LU-5.7, OS-2.10, OS-8.1, OS-8.2, and OS-8.5. Updates to the Zoning Ordinance and LCP would involve land-use changes that would be consistent with the General Plan Update.

Compliance with FESA and CESA would require agencies to consult with the USFWS or CDFW on proposed actions that may affect any endangered, threatened, or proposed (for listing) species or critical habitat that may support the species. The MBTA implements international treaties between the U.S. and other nations devised to protect migratory birds, and any of their parts, eggs, and nests, from activities such as hunting, pursuing, capturing, killing, selling, and shipping, unless expressly authorized in the regulations or by permit. All future development within the City would be required to comply with the MBTA. Section 1600 of the California Fish and Game Code would require future projects to notify CDFW of any proposed alteration of streambeds, rivers, and lakes with the intention of protecting habitats that are important to fish and wildlife. The NPPA prohibits the take of rare and endangered plants, including special-status plant species and compliance with the NPPA would ensure that endangered or rare native plants are protected.

The goals and policies in the Land Use and Open Space and Conservation Elements of the proposed project and compliance with the policies and regulations under the FESA, MBTA, CESA, California

Fish and Game Code, CWA, and NPPA would ensure impacts to special-status species associated with new development allowed under the proposed project are less than significant.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impacts relating to habitat or special species. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.3-17)

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**Impact 5.3-2: The proposed project would not adversely impact sensitive natural communities, including wetlands and riparian habitat. [Threshold B-2 and B-3]**

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Sensitive natural communities are those that are ranked as critically imperiled, imperiled, or vulnerable, per the State ranking system. According to a CNDDB search, three sensitive natural vegetation communities were recorded within or near the City: Southern Coastal Salt Marsh, Southern Dune Scrub, and Southern Coastal Bluff Scrub.

While the City is mostly urbanized, it does contain open space areas that may be suitable for sensitive natural communities such as wetlands and riparian habitats. These habitats may support special-status plant and animal species and are known to be highly productive and diverse ecosystems. The City contains riparian communities adjacent to wetlands and near King Harbor Marina. Implementation of the proposed project would increase development in the City, which could indirectly impact sensitive natural communities with an overall increase in the City's population (resident and work).

Future development in accordance with the proposed project could impact waters and wetlands jurisdictional to the CCC, CDFW, USACE, and Los Angeles RWQCB. Waters of the United States are jurisdictional to the USACE; waters of the State are jurisdictional to the Los Angeles RWQCB and the CDFW; and wetlands meeting certain criteria are jurisdictional to the CCC, USACE and/or the CDFW.

Updates to the Zoning Ordinance and LCP would involve land-use changes that would be consistent with the General Plan Update. Construction projects in the City would also have the potential to affect riparian habitats by spreading or introducing invasive plant species to currently uninfected areas. Invasive species spread aggressively and crowd out native species, potentially altering the species composition of natural communities. A predominance of invasive species reduces the overall habitat quality for native plants and wildlife. However, the Land Use and Open Space and Conservation Elements of the General Plan Update include several policies that would mitigate potential impacts on natural communities such as riparian habitat and wetlands, including Polices LU-5.7, OS-8.2, OS-8.5, and OS-8.6.

If the USACE determines that waters of the United States are present, a Section 404 permit from the USACE for placement of fill within waters of the United States and a Section 401 water quality certification from the RWQCB would be required. Placement of fill materials into waters of the United States would require compensation to ensure no net loss of aquatic resources. Additionally, disturbance or alteration of streams, lakes, or non-federally protected (non-jurisdictional) wetlands would require a permit, which would include conditions to protect these sensitive natural communities. A Section 1602

streambed alteration agreement would be needed from the CDFW prior to initiation of project construction activities within the City that would divert, obstruct, or change the natural flow of a river, stream, or lake or that would use material from a streambed. Non-jurisdictional wetlands include wetland features that are not hydrologically connected to navigable waters in rivers and are not under USACE jurisdiction. These wetlands would still be considered waters of the State and would be regulated according to waste discharge requirements that would be issued by the RWQCB.

Implementation of the General Plan Update goals and policies, with conditions associated with streambed alteration agreements and waste discharge requirements, would ensure that impacts on riparian corridors and other sensitive natural communities are less than significant.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impacts relating to sensitive natural communities. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.3-19)

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**Impact 5.3-3: The proposed project would not interfere with the movement of wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. [Threshold B-4]**

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The City of Redondo Beach is built out with urban land uses, and there is little native habitat available for wildlife movement remaining in the City. Thus, there are no major or regional officially designated wildlife corridors passing through the City. Furthermore, the City of Redondo Beach does not contain natural waterways that would allow for the movement of a native resident or migratory fish. Additionally, parks, the bluffs, and open space areas within and adjacent to the City could provide terrestrial connectivity.

The City lies within the Pacific Flyway, a bird migration route extending from the Arctic to South America. Two categories of birds use the Flyway: waterfowl, such as ducks and geese; and shorebirds (or waders) such as sandpipers, avocets, stilts, and plovers. Developed land uses in the City contain ornamental landscaping including trees and shrubs. Such vegetation may be used by migrating birds protected by the MBTA. The MBTA implements international treaties between the U.S. and other nations devised to protect migratory birds, and any of their parts, eggs, and nests, from activities such as hunting, pursuing, capturing, killing, selling, and shipping, unless expressly authorized in the regulations or by permit. All future development within the City would be required to comply with the MBTA.

Updates to the Zoning Ordinance and LCP would involve land-use changes that would be consistent with the General Plan Update. The Land Use and Open Space and Conservation Elements of the General Plan Update contain goals and policies that address potential impacts to native resident or migratory fish or wildlife species and corridors, such as Policy LU-5.7, which ensures connectivity of habitat with Torrance and Hermosa Beach and applies strategies and approaches to fund and incentivize expansion of native habitat and plants throughout the City on both public and private property. Policy OS-8.1 directs the City to coordinate with the neighboring cities, Los Angeles County, regional agencies, and environmental and conservation communities/groups to ensure critical habitat areas are preserved, expanded, and connected.

The proposed General Plan Update goals and policies, in combination with other federal and State policies and regulations, would ensure impacts to migratory species are less than significant.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impacts relating to wildlife or wildlife corridors. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.3-21)

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**Impact 5.3-4: The proposed project would not conflict with any local policies or ordinances protecting biological resources nor with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or State habitat conservation plan. [Thresholds B-5 and B-6]**

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The General Plan Update would not conflict with any local policies or ordinances protecting biological resources. The Beach Bluffs Restoration Project Master Plan aims to restore the natural diversity of the remnant dunes and bluffs along the Santa Monica Bay between Ballona Creek and the Palos Verdes Peninsula. This Master Plan prioritizes sites that could be restored and describes actions for education and community involvement. Furthermore, the goals of the Master Plan increase the ecological value of the beach bluffs by restoring the native vegetation, increase recreational value by providing stewardship opportunities for restored bluffs, and provide a public education program about the beach bluffs and their coastal environment. The City of Redondo Beach Municipal Code includes Title 10 Planning and Zoning, Chapter 5, Coastal Land Use Plan Implementing Ordinance, which prohibits trimming or disturbance of trees that have been used for breeding and nesting by bird species listed pursuant to the FESA, California bird species of special concern, and wading birds (herons or egrets) within the previous five years. The General Plan Update would be required to comply with all applicable policies and plans pertaining to biological resources and would not conflict with such policies and ordinances.

Additionally, Policy OS-8.4, Urban Forest, seeks to expand the City's urban forest in a consistent, coordinated, and environmentally conscious manner and prioritize native trees and associated companion species and habitats. Updates to the Zoning Ordinance and LCP would involve land-use changes that would be consistent with the General Plan Update. Therefore, the proposed project would not conflict with any local policies or ordinances protecting biological resources. No impact would occur in this regard.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impacts relating to conservation plans. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.3-21)

## 4. Cultural Resources

**Impact 5.4-3: Future development facilitated by the proposed project could potentially disturb human remains, including those interred outside of dedicated cemeteries. [Threshold C-3]**

Soil-disturbing activities associated with future development in accordance with the proposed project could result in the discovery of human remains. California Health and Safety Code, Section 7050.5; CEQA Section 15064.5; and PRC Section 5097.98 mandate the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery. Specifically, California Health and Safety Code, Section 7050.5, requires that if human remains are discovered on a project site, disturbance of the site shall remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the PRC. If the coroner determines that the remains are not subject to his or her authority, and if the coroner recognizes or has reason to believe the human remains are those of a Native American, he or she shall contact the Native American Heritage Commission by telephone within 24 hours. Subsequently, the Native American Heritage Commission shall identify the "most likely descendant." The most likely descendant shall then make recommendations and engage in consultation concerning the treatment of the remains as provided in PRC Section 5097.98. Although soil-disturbing activities associated with development in accordance with the proposed project could result in the discovery of human remains, compliance with existing law would ensure that significant impacts to human remains would not occur.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impacts relating to human remains. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.4-16)

### Energy

**Impact 5.5-1: Implementation of the proposed project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. [Threshold E-1]**

### Short-Term Construction Impacts

The proposed project is a regulatory document that sets the framework for future growth and development in the City and does not directly result in development. Construction of individual development project facilitated by the proposed project would create temporary demands for electricity. Natural gas is not generally required to power construction equipment, and therefore is not anticipated during construction phases. Electricity use would fluctuate according to the phase of construction. Additionally, it is anticipated that most electric-powered construction equipment would

be hand tools (e.g., power drills, table saws, compressors) and lighting, which would result in minimal electricity usage during construction activities.

Future individual development projects would also temporarily increase demands for energy associated with transportation. Transportation energy use depends on the type and number of trips, VMT, fuel efficiency of vehicles, and travel mode. Energy use during construction would come from the transport and use of construction equipment, delivery vehicles and haul trucks, and construction employee vehicles that would use diesel fuel or gasoline. The use of energy resources by these vehicles would fluctuate according to the phase of construction and would be temporary. It is anticipated that most off-road construction equipment, such as those used during demolition and grading, would be gas or diesel powered. In addition, all operation of construction equipment would cease upon completion of project construction.

Furthermore, the construction contractors would minimize nonessential idling of construction equipment during construction in accordance with the California Code of Regulations Title 13, Article 4.8, Chapter 9, Section 2449. Such required practices would limit wasteful and unnecessary energy consumption during the construction of individual development projects facilitated by the proposed project. Therefore, the construction of individual development projects facilitated by the proposed project would not result in wasteful, inefficient, or unnecessary consumption of fuel use (energy resources).

### Long-Term Impacts During Operation

Operation of new development projects accommodated under the proposed project would create additional demands for electricity and natural gas compared to existing conditions. Operational use of electricity and natural gas would include heating, cooling, and ventilation of buildings; water heating; operation of electrical systems; use of on-site equipment and appliances; and lighting. Updates to the Zoning Ordinance would reflect new land use designations and densities specified by the Focused General Plan Update. Updates to the LCP would include revisions to the Coastal Land Use Plan and Implementation Plan. These modifications would involve land-use changes that would be consistent with the Focused General Plan Update and the recently certified Housing Element and would not substantially affect energy.

#### *Nontransportation Energy*

Electrical service to the City is provided by SCE and CPA through connections to existing off-site electrical lines and new on-site infrastructure. As shown in Table 5.5-4 of the PEIR, *Year 2050 Forecast Electricity Consumption*, by horizon year 2050, electricity use in the City would increase by 230,624,940 kWh/year, or approximately 35 percent, from existing conditions.

As shown in Table 5.5-5 of the PEIR, *Year 2050 Forecast Natural Gas Consumption*, existing natural gas use in the City totals11,148,598 therms annually. By 2050, natural gas use in the City would increase by 2,623,262 therms annually, or approximately 24 percent, from existing conditions to a total of 13,771,860 therms per year.

While the electricity and natural gas demand for the City would increase compared to existing conditions, development accommodated under the General Plan Update would be required to comply with the current and future updates to the Building Energy Efficiency Standards and CALGreen, which

would contribute to reducing the energy demands shown in Tables 5.5- and 5.5-5. New and replacement buildings in compliance with these standards would generally have greater energy efficiency than existing buildings. It is anticipated that each update to the Building Energy Efficiency Standards and CALGreen would result in greater building energy efficiency and move closer toward buildings achieving ZNE.

In addition to the Building Energy Efficiency Standards and CALGreen, the General Plan Update includes policies to increase energy efficiency and reduce wasteful, inefficient use of energy resources. Policies S-10.1, S-10.4, and S-10.6 would support energy efficiency and renewable energy improvements at homes, businesses, and City-owned facilities. Encouraging sustainable and energy-efficient building practices and using more renewable energy strategies would further reduce energy consumption and move closer to achieving ZNE goals.

### *Transportation Energy*

The growth accommodated under the General Plan Update would consume transportation energy from the use of motor vehicles (e.g., gasoline, diesel, compressed natural gas, and electricity).

Table 5.5-6 of the PEIR, *Operation-Related Annual Fuel Usage: Net Change from Existing,* shows the net change in VMT, fuel usage, and fuel efficiency under horizon year 2050 General Plan Update conditions from existing baseline year 2023 conditions and existing uses under year 2050 conditions.

When compared to existing baseline year conditions, the General Plan Update would result in an increase in VMT for gasoline-, electric-, and diesel-powered vehicles. Although annual VMT would increase for gasoline- and diesel-powered vehicles, the fuel efficiency would increase by 6.84 mpg and 0.90 mpg, respectively. For electric-powered vehicles, annual VMT would increase by 53,072,198 miles and annual consumption would increase by 11,978,432 kWh. The large increase in VMT and fuel usage for electric-powered vehicles are primarily based on the assumption in EMFAC that a greater mix of light-duty automobiles would be electric-powered in future years based on regulatory (e.g., Advanced Clean Cars) and consumer trends. Overall, the increase in VMT would be primarily attributable to the population growth associated with the General Plan Update (see Table 5.12-7 in Chapter 5.12, *Population and Housing*).

Compared to existing uses under year 2050 conditions, the General Plan Update would result in an increase in VMT and fuel usage for all fuel types (see "Net Change from Existing Year 2050" column). However, the fuel efficiency between the existing uses under 2050 conditions and the uses under the General Plan Update buildout would be the same, and implementation of the General Plan Update would not result in less efficiency in transportation fuel usage.

The improvement in fuel efficiency would be attributable to regulatory compliance (e.g., CAFE standards), resulting in new cars that are more fuel efficient and the attrition of older, less fuel-efficient vehicles. The CAFE standards are not directly applicable to residents or land use development projects, but to car manufacturers. Thus, residents and employees of Redondo Beach do not have direct control in determining the fuel efficiency of vehicles manufactured and that are made available. However, compliance with the CAFE standards by car manufacturers would ensure that vehicles produced in future years have greater fuel efficiency and would generally result in an overall benefit of reducing fuel usage by providing the population of the City more fuel-efficient vehicle options. Furthermore, while

the demand in electricity would increase under the proposed project, in conjunction with the regulatory (i.e., Renewables Portfolio Standard, SB 350, and SB 100) and general trend toward increasing the supply and production of energy from renewable sources, it is anticipated that a greater share of electricity used to power electric vehicles would be from renewable sources in future years (e.g., individual photovoltaic systems, purchased electricity from SCE or CPA, and/or purchased electricity from SCE or CPA that is generated from renewable sources).

In addition to regulatory compliance that would contribute to more fuel-efficient vehicles and less demand for fuels, the General Plan Update includes policies that will contribute to minimizing overall VMT, and thus fuel usage associated with the City. Policies LU-2.8, LU-3.7, LU-4.6, OS-1.8, and OS-1.10 would encourage nonvehicular travel modes in the design and development of future projects. Policies LU-3.8, LU-3.10, and LU-6.22 would aid in minimizing VMT through incentives for vanpools or home-based businesses and improve corridor connectivity for passive uses along City streets.

Collectively, the policies and action listed above would minimize overall VMT, and thus fuel usage associated with potential future development in Redondo Beach. Furthermore, the proposed project would rely on mixed-use, transit-oriented development, and infill development for projected growth in the Redondo Beach region, thus contributing to reduced energy use from the transportation sector. For example, Policy LU-4.6 in the Land Use Element would encourage expansion of connectivity between residential neighborhoods and commercial corridors/businesses. Although population and VMT are projected to grow, the jobs-housing ratio would increase from 0.94 to 1.02—closer to a more equal distribution of employment and housing (see Impact 5.12-1 of this PEIR). Having a jobs-rich city would encourage employment opportunities for city residents and workers commuting out of Redondo Beach. Therefore, this could result in shorter distances traveled between where people work and live and to amenities.

Compliance with federal, State, and local regulations (e.g., Building Energy Efficiency Standards, CALGreen, Renewable Portfolio Standards, and CAFE standards) will increase building energy efficiency and vehicle fuel efficiency and reduce building energy demand and transportation-related fuel usage. Additionally, the General Plan Update includes policies related to land use, transportation planning, energy efficiency, and renewable energy generation that would contribute to minimizing the City's total energy consumption. Implementation of policies under the General Plan Update in conjunction with and complementary to regulatory requirements, will ensure that energy demand associated with growth under the proposed project would not be inefficient, wasteful, or unnecessary. Therefore, energy impacts associated with implementation and operation of land uses accommodated under the proposed project would be less than significant.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impacts relating to wasteful, inefficient, or unnecessary consumption of energy resources. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.5-27)

## 5. Geology and Soils

**Impact 5.6-1: Project residents and visitors would be subject to potential seismic-related hazards; however, development associated with the proposed project would adhere to existing structural safety requirements. [Threshold G-1i–iv])**

### Seismic Hazards

Earthquakes can be expected in the Redondo Beach area on any of the faults in the region listed in Table 5.6 1, Estimated Maximum Earthquake Magnitude and Distance to Faults Near Redondo Beach. In Redondo Beach, earthquake effects include possible ground shaking and secondary effects of earthquakes, including landslides, liquefaction, settlement, subsidence, collapse, ground lurching, and tsunami-related erosion.

Secondary effects are nontectonic processes such as ground deformation, including fissures, settlement, displacement, and loss of bearing strength, which are the leading causes of damage to structures during a moderate to large earthquake.

### Ground Shaking

The City is in a seismically active part of Southern California. Conformance with the CBC would reduce impacts to new development associated with strong seismically induced ground shaking to the maximum extent practicable, under currently accepted engineering practices. The CBC sets forth structural design parameters for buildings to withstand seismic shaking without substantial structural damage. Section 1803 of the CBC requires preparation of a site-specific geotechnical investigation to assess the degree of potential seismic hazards and recommend appropriate design/mitigation measures. The 2022 CBC contains standards and regulations relating to seismic safety and construction standards for building foundations. Conformance with the CBC, as required by State law, would minimize the potential for damage of new structures and their foundations.

### Liquefaction

Areas of concern for potential liquefaction in Redondo Beach are areas along the City's southwestern boundary, and the location of the sand and gravel-filled deposits that make up the sediment along the City's beaches. Research and historical data indicate that loose, granular materials at depths of less than 50 feet with silt and clay contents of less than 30 percent saturated by relatively shallow groundwater table are most susceptible to liquefaction. These geological conditions are typical in parts of southern California, including Redondo Beach, and in valley regions and alluvial floodplains. The City's southwestern edge along the coast is susceptible to liquefaction. Areas of liquefaction hazard are shown in Figure 5.6-3, Liquefaction Zones in Redondo Beach. Policy S-4.5 would require new development in liquefaction zones to implement specific measures in CBC Chapter 18 to reduce damage in an earthquake event. Redondo Beach includes both hillside topography with some areas of steep slopes and areas that are relatively flat. The City is made up of Pleistocene and Holocene soil deposits. These deposits make for stable soil conditions. Liquefaction related to potential erosion is still a concern for the City because coastal areas are made up of loose soils and are susceptible to liquefaction. Tsunamis from seismic-related events may also be potentially significant to the City in areas within a few miles

of the ocean, primarily along the southwestern edge of the City. Policy OS-6.4 addresses soil erosion in coastal areas and its applicable coordination with the county and other agencies when addressing the erosion hazards and impacts.

### Landslides

Marginally stable slopes (including existing landslides) may be subject to landslides caused by earthquakes. The landslide hazard depends on many factors, including existing slope stability, shaking potential, and presence of existing landslides. Although there are some areas of slope in the City, much of the terrain of the City is relatively flat and built up. Landslides are not a concern for the City of Redondo Beach (USGS 2024d). Although the City has varying topography in sections of the City, such as areas in the neighborhoods in the upper Avenues, Beryl Heights, and areas near Dominguez Park, soils in these areas tend to be compact in nature and would not affect existing facilities or future uses due to landslide hazards. Since Redondo Beach is mainly built-up and areas where there is varying topography, have established infrastructure, landslide susceptibility is not a concern for the City (USGS 2024e). Adherence to Policy S-4.4 would introduce notifications for owners on or near faults/newly discovered faults, and requirements for review of soils and their hazards, relative to seismicity prior to various steps in the planning process. Additional policies that would enforce regulations and mitigation efforts for seismicity include Policy S-2-1, Policy S 2-2, Policy S 3.1, Policy S-3.2, Policy S-4.1, Policy S-4.2, Policy S-4.3, Policy S-4.5, Policy S-4.6, Policy S-4.7, Policy S-4.9, Policy S-4.10, and Policy S-4.11. Impacts of seismic-related hazards would be less than significant.

### Settlement, Subsidence, and/or Collapse

Subsidence refers to the sudden sinking or gradual downward settling and compaction of soil and other surface material with little or no horizontal motion. It may be caused by a variety of human and natural activities, including underground mining, oil and gas extraction, sinkholes, or drainage and decomposition of organic soils. Most of the early documented cases of subsidence affected only agricultural land or open space. As urban areas have expanded, so too have the impacts of subsidence on structures for human occupancy. Although there have been isolated incidents, Redondo Beach is not susceptible to soil subsidence. (Redondo Beach 1993 USGS 2024e).

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impacts relating to seismic-related hazards. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.6-25)

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**Impact 5.6-2: Unstable geologic unit or soils conditions, including soil erosion and loss of topsoil, could result from development of the proposed project; however, such development would adhere to existing regulatory requirements. [Thresholds G-2, G-3, and G-4]**

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Development facilitated by the proposed project would involve soil disturbance, construction, and operation of developed land uses that could each be subject to unstable soil conditions.

### Soil Erosion

Soils are particularly prone to erosion during the grading phase of development, especially during heavy rains. The use of a Storm Water Pollution Prevention Plan (SWPPP), which specifies best management practices for temporary erosion control, would reduce the potential for erosion during construction activities. Standard erosion control measures would be implemented as part of a SWPPP for proposed projects within the City to minimize the risk of erosion or sedimentation during construction. The SWPPP must include an erosion control plan that prescribes measures, such as phased grading, limited areas of disturbance, designated restricted-entry zones, diversion of runoff from disturbed areas, protective measures for sensitive areas, outlet protection, and provisions for revegetation or mulching.

The young alluvial sediment underlying the City is generally granular, poorly consolidated, and very susceptible to erosion. Grading can increase the potential for erosion by removing protective vegetation, changing natural drainage patterns, and constructing slopes. General Plan Policy OS-6.4, would prevent erosion of beaches and coastal bluffs by maintaining stormwater systems, educating the public about erosion factors, restricting pedestrian access to vegetated areas, continuing beach bluff restoration, and coordinating with the County and other entities.

Mandatory compliance with existing regulations, including the preparation and submittal of a SWPPP and a soil engineering evaluation, and compliance with the Proposed General Plan policies, would help mitigate issues associated with erosion in the project area and would reduce the impacts to less than significant.

### Expansive Soils

Most of the City consists of alluvial sediments, and therefore there is some potential for expansive soils throughout the City. Expansive soils are possible wherever clays and elastic silts may be present, including alluvial soils and weathered granitic and fine-grained sedimentary rocks. The presence of expansive soils represents a potential hazard to structures and people.

The City has adopted the latest version of the CBC (2022 CBC), which requires that structures be designed to mitigate for expansive soils. Methods that could be used to reduce the impact of expansive soils include drainage control devices to limit water infiltration near foundation, over-excavation and recompacting of engineered fill, or support of the foundation with piles. Applicable General Plan policies include Policy S-4.5 and S-18, which would require adherence to the CBC and implementation of measures to reduce damage due to liquefaction, and requirements for geotechnical reports and EIRs to be adherent to the CBC which would map areas susceptible to landslides, and mudflows. The methods in the CBC, as well as policies in the Proposed General Plan, would reduce impacts related to expansive soils to less than significant.

### Settlement and Collapse

Settlement or collapse is a risk in areas with alluvial soils. Areas of large settlement can damage or destroy structures. Compressible soil in the City is a hazard to structures and people. The CBC requires that structures be designed to mitigate compressible soils. Methods that could be used to reduce the impact of compressible soils include using piles to transfer the weight of the structure to underlying noncompressible layers, and over-excavating compressible soils and recompacting with engineered fill.

Adherence to policies in the Proposed General Plan would help to mitigate problems associated with settlement or collapse, such as Policies S-4.5 and S-4.11, which would set standards and requirements for building or project planning that would identify multiple soil characteristics and their risks. These standards would reduce the impact of settlement or compressible soils to less than significant.

### Subsidence

Hazards surrounding subsidence are not a large issue in the City of Redondo Beach (USGS 2024e). Additionally, there are no active oil wells in the City that would cause a concern for subsidence, caused by oil wells. Subsidence-related hazards would be less than significant. Section 5.8.2, *Hazards and Hazardous Materials*, addresses oil wells and their current statuses, and there are no currently active oil wells within City boundaries that would pose a threat of subsidence.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impact relating to geologic hazards, erosion, and loss of topsoil. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.6-26)

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**Impact 5.6-3: Soil conditions may adequately support proposed septic tanks. [Threshold G-5]**

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Septic systems are allowed in the City if they adhere to Municipal Code Title 5, Chapter 7.111, which outlines the provisions on septic waste: "No person shall leave, deposit, discharge, dump, or otherwise expose any chemical or septic waste to precipitation in an area where a discharge to City streets or MS4 may or does occur," or are seeking improvements to existing single-family residences, in which a Coastal Development Permit would be required prior to implementation (Redondo Beach 2021). Redondo Beach has also adopted the 2022 CBC and the 2022 Plumbing Code, which outline provisions, regulations, and provisions associated with excavation and implementation for septic tanks.

In Redondo Beach, permits are required before installing a septic tank in areas where connection to the City's sewer facilities are not feasible. Pursuant to the CBC, a site investigation must determine that soil conditions are suitable. The provisions and requirements of the 2022 Plumbing Code and the CBC and the City's municipal code outline the provisions for installing septic tanks in the City; therefore, impacts would be less than significant.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impacts relating to geologic hazards and soil conditions. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.6-26)

## 6. Hazards and Hazardous Materials

**Impact 5.8-1: Project construction and operations would not create a significant impact due to the transport, use, and/or disposal of hazardous materials; and reasonably foreseeable upset and accident conditions; and would not impact an existing or proposed school. [Thresholds H-1, H-2, and H-3]**

### Construction

The proposed project is a regulatory document that sets the framework for future growth and development in the City and does not directly result in development. Updates to the Zoning Ordinance and LCP would involve land-use changes that would be consistent with the General Plan Update. Potentially hazardous materials used during construction include substances such as paints, sealants, solvents, adhesives, cleaners, and diesel fuel. There is potential for these materials to spill or to create hazardous conditions. However, the materials used would not be in such quantities or stored in such a manner as to pose a significant safety hazard. These activities would also be short term or one time in nature. Project construction workers would be trained in safe handling and hazardous materials use.

To prevent hazardous conditions, existing local, state, and federal laws—such as those listed under Section 5.8.1.2, *Regulatory Background*—are to be enforced at construction sites as well as during the transport and disposal of hazardous materials. For example, compliance with existing regulations would ensure that construction workers and the general public are not exposed to any risks related to hazardous materials during construction activities. Cal/OSHA has regulations concerning the use of hazardous materials, including requirements for safety training, exposure warnings, availability of safety equipment, and preparation of emergency action/prevention plans. For example, all spills or leakage of petroleum products during construction activities are required to be immediately contained, the hazardous material identified, and the material remediated in compliance with applicable state and local regulations for the cleanup and disposal of that contaminant. All contaminated waste encountered would be required to be collected and disposed of at an appropriately licensed disposal or treatment facility. Furthermore, strict adherence to all emergency response plan requirements set forth by the Los Angeles County Fire Department and the RBFD would be required throughout the duration of project construction. Therefore, impacts would be less than significant.

### Operations

The proposed project would allow for the development of a variety of land uses, including industrial, residential, commercial, office, civic/institutional, and open space uses. Industrial uses and some commercial uses utilize greater amounts of hazardous materials than other uses, such as residential uses and schools. Operation of future residential and some commercial uses that would be accommodated would involve the use of small quantities of hazardous materials for cleaning and maintenance purposes, such as paints, household cleaners, fertilizers, and pesticides. Operation of future industrial and some types of commercial uses would involve use of larger amounts of hazardous materials, such as fuel/diesel, and commercial grade chemicals, solvents, cleaners, etc. These types of industrial and commercial uses, and therefore, the specific types of hazardous materials to be used, are not yet known.

The use, storage, transport, and disposal of hazardous materials by future residents and commercial and industrial tenants/owners would be required to comply with existing regulations of several agencies, including the California Department of Toxic Substances Control, US Environmental Protection Agency, California Division of Occupational Safety and Health, California Department of Transportation, and LA County Fire Department. Regulations that would be required of the uses that involve transporting, using, or disposing of hazardous materials include RCRA, which provides the "cradle to grave" regulation of hazardous wastes; CERCLA, which regulates closed and abandoned hazardous waste sites; the Hazardous Materials Transportation Act, which governs hazardous materials transportation on U.S. roadways; International Fire Code, which creates procedures and mechanisms to ensure the safe handling and storage of hazardous materials; CCR Title 22, which regulates the generation, transportation, treatment, storage and disposal of hazardous waste; and CCR Title 27, which regulates the treatment, storage, and disposal of solid wastes. For development in California, Government Code Section 65850.2 requires that no final certificate of occupancy or its substantial equivalent be issued unless there is verification that the owner or authorized agent has met, or is meeting, the applicable requirements of the Health and Safety Code, Sections 25500 through 25520.

Compliance with applicable laws and regulations governing the use, storage, transport, and disposal of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts. Additionally, future residential and nonresidential uses under the proposed project would be constructed and operated with strict adherence to all emergency response plan requirements of the RBFD and County Fire.

County Fire's Health Hazardous Materials Division is the Certified Unified Program Agency (CUPA) for the City of Redondo Beach. County Fire and the RBFD work together to implement the City's proposed Emergency Operations Plan that addresses Redondo Beach's planned response to emergencies. The CUPA is responsible for managing the following programs in the county:

- Underground Storage Tank Program
- Aboveground Petroleum Storage Act Requirements
- Hazardous Waste Generator and Onsite Hazardous Waste Treatment Programs
- Hazardous Materials Release Response Plans and Inventories (Business Plan)
- California Accidental Release Prevention
- Hazardous Material Management Plans

Additionally, several policies in the General Plan Update would minimize risks from businesses that use hazardous materials. For Example, Policy S-8.3 would identify and coordinate with local businesses to minimize hazardous waste produced by businesses that must use those materials, and Policy S-8.7 would ensure that the use and disposal of hazardous materials in the City comply with local, regional, state, and federal safety standards. Additional policies that relate to storage, operation, transport, and emergency procedures for hazardous sites/wastes are S-8.1, S-8.2, S-8.4, S-8.5, S-8.6, S-8.8, and S-8-9. Therefore, impacts would be less than significant.

### Demolition

Future development projects under the proposed project may involve demolition of existing buildings and structures associated with a specific development site. Some building materials used in the mid-

and late-1900s are considered hazardous to the environment and harmful to people. For example, while asbestos was generally not used in building materials by 1980, it was still occasionally used until the late 1980s. Lead-based paint was banned for residential use in 1978 and phased out for commercial structures in 1993.

Typical hazardous materials of concern for existing older structures in the City include asbestos, lead, mold, PCBs, and radon.

For buildings constructed before the 1950s, it is likely that some contain ACMs and LBP as well as other building materials containing lead (e.g., ceramic tile and insulation). Demolition of these buildings could cause encapsulated ACM (if present) to become friable (i.e., easily crumbled or pulverized); once airborne, they are considered a carcinogen. Demolition could also cause the release of lead into the air. The EPA has classified lead and inorganic lead compounds as "probable human carcinogens," and such releases could pose significant risks to persons living and working in and around a proposed development site (EPA 2004).

The presence of visible water damage, damp materials, visible mold, or mold odor in buildings increases the potential risks for respiratory disease in occupants. According to the California Department of Public Health, known health risks include the development of asthma, allergies, and respiratory infections; the triggering of asthma attacks; and increased wheezing, coughing, difficulty breathing, and other symptoms.

PCBs are synthetic chemicals that were manufactured for use in various industrial and commercial applications—including oil in electrical and hydraulic equipment, and plasticizers in paints, plastics, and rubber products—because of their nonflammability, chemical stability, high boiling point, and electrical insulation properties. When released into the environment, PCBs persist for many years and bioaccumulate in organisms. The EPA has classified PCBs as probable human carcinogens. In 1979, the USEPA banned the use of PCBs in most new electrical equipment and began a program to phase out certain existing PCB-containing equipment.

State agencies, in conjunction with the EPA and OSHA, regulate removal, abatement, and transport procedures for asbestos-containing materials. Releases of asbestos from industrial, demolition, or construction activities are prohibited by these regulations; medical evaluation and monitoring are required for employees performing activities that could expose them to asbestos. The regulations include warnings and practices that must be followed to reduce the risk for asbestos emissions and exposure. Finally, federal, state, and local agencies must be notified prior to the onset of demolition or construction activities with the potential to release asbestos. Requirements for limiting asbestos emissions from building demolition and renovation activities are specified in South Coast AQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities). California Government Code Sections 1529 and 1532.1 provide for exposure limits, exposure monitoring, respiratory protection and good working practice by workers exposed to lead and ACMs. Therefore, impacts would be less than significant.

### Accidental Release

The use, storage, and transport of hazardous materials and hazardous wastes in compliance with the laws and regulations mentioned above would minimize the potential for releases of hazardous materials that could pose substantial hazards to the public or the environment and would entail prompt containment and cleanup of spills. Residential uses, some civic/institutional uses such as schools and parks, and some commercial uses utilize only small amounts of hazardous materials—such as cleansers, paints, fertilizers, and pesticides—and mostly or entirely for cleaning and maintenance purposes. Use of such small amounts of hazardous materials would not pose substantial hazards to the public or the environment through accidental releases. Businesses handling reporting quantities of hazardous or extremely hazardous materials would maintain business plans including: procedures in the event of a hazardous materials release, procedures for immediate notification of all appropriate agencies and personnel, identification of local emergency medical assistance, contact information for company emergency coordinators, a listing and location of emergency equipment at the business, an evacuation plan, and a training program for business personnel.

Under CalARP, Cal OES must adopt implementing regulations and seek delegation of the program from the EPA. CalARP aims to be proactive and therefore requires businesses to prepare risk management plans, which are detailed engineering analyses of the potential accident factors present at a business and the mitigation measures that can be implemented to reduce this accident potential. In most cases, local governments will have the lead role for working directly with businesses in this program. The Los Angeles County Fire Department is the CUPA designated as the administering agency for CalARP. Therefore, impacts would be less than significant.

### Pipelines

As noted in Section 5.8.1.3, *Existing Conditions*, hazardous pipelines run through the City (DOT 2024). (See Figure 5-8.1, *Gas Transmission Pipelines in Redondo Beach,* and Figure 5.8-2, *Hazardous Liquid Pipelines in Redondo Beach*.) Additionally, municipal code Section 11-4.16 would provide guidelines to follow within the City that concern coordination with the local fire department, producing a pipeline safety plan, and any other applicable law. Furthermore, policies such as Policy 6.8.1, Policy 6.8.2, Policy 6.8.3, and Policy 6.8.4 all pertain to petroleum utility operations encompassing improvements, maintenance, requirements, and overall work surrounding petroleum pipelines.

### Schools

There are currently 13 public schools and 12 private schools in Redondo Beach. Policy S-8.8 would prohibit any new facilities using, storing, or producing hazardous materials from being located directly adjacent to existing residential or school uses. Therefore, impacts would be less than significant.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impacts relating to transport, use, and disposal of hazardous materials, to release of hazardous materials, and to emission and handling of hazardous materials, substances, or waste. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.8-34)

**Impact 5.8-2: There are sites with the planning area that are on the list of hazardous materials sites but would not create a significant hazard to the public or environment. [Threshold H-4]**

There are currently 14 hazardous waste sites within the City (see Table 5.6-3, Active or Open Hazardous Waste Sites in Redondo Beach). Properties contaminated by hazardous substances are regulated at the local, state, and federal level and are subject to compliance with stringent laws and regulations for investigations and remediation. For example, compliance with the CERCLA, RCRA, CCR Title 22, and related requirements would remedy all potential impacts caused by hazardous substance contamination. Additionally, there are several policies in the General Plan Update that would ensure impacts as a result of hazardous materials would be reduced. For example, Policy S-8.1 would make sites coordinate with Los Angeles County to effectively manage hazardous waste facilities and materials, including household hazardous waste, through the enforcement of federal, state, and local regulations, to ensure safe handling, transport, use, and disposal of toxic and hazardous materials. Additionally, Policies S-8.2, S-8.3, S-8.4, S-8.5, S-8.6, S-8.7, S-8.8, and S-8.9 have set regulations and procedures to follow for sites that handle, store, operate, and dispose of hazardous materials. Therefore, impacts would be less than significant.

**Finding.** The proposed project would have no direct, indirect, or cumulative impacts relating to safety hazard to the public or environment. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.8-35)

**Impact 5.8-3: The project site is not located in the vicinity of an airport or within the jurisdiction of an airport land use plan. [Threshold H-5]**

Airport operations and their accompanying safety hazards require careful land use planning on adjacent and nearby lands to protect the residential and business communities from the potential hazards that could be created by airport operations. Pursuant to Section 21096 of the Public Resources Code, the lead agency must consider whether the project would result in a safety hazard for persons using the airport or for persons residing or working in a project area.

Redondo Beach is not within the vicinity of any airports or within the jurisdiction of an airport land use plan. The closest airport is approximately 1.6 miles southwest of the City. Therefore, no impacts would occur.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impact relating to airports in the area. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.8-35)

**Impact 5.8-4: Project development would not affect the implementation of an emergency responder or evacuation plan. [Threshold H-6]**

The regional access roads located in the City include SR-1 and SR-107. There are many local arterials in the City for accessibility of execution of emergency operations. Additionally, the proposed project has many policies associated with emergency operations. For example, Policy S-1.1 and Policy S-1.4 address cooperation and coordination with the City of Redondo Beach EOP, COOP, and the local Emergency Operations Center. Additional policies that would address emergency operations and preparedness include S-1.2, S-1.3, S-1.5, S-1.6, S-1.7, S-1.8, S-2.4, S-2.5, S-4.2, S-4.3, S-4.6, and S-5.2.

Regarding emergency operations and notification systems for citizens and visitors of Redondo Beach, many policies are in place to ensure public safety and early notification in the event of emergencies. For example, Policy S-1.3 and Policy S-1.7 aim to increase public awareness and knowledge of emergency response planning, procedures, and opportunities for public engagement, participation, and support. They provide for alerts about potential, developing, and ongoing emergency situations through extensive early-warning and notification systems that convey information to all residents in multiple languages and formats to ensure it is widely accessible.

Additionally, the use of Redondo Beach's LHMP would serve as a reference for available evacuation routes and procedures to accompany emergency operations. Policy S-1.5 aims to incorporate the current LHMP, most recently approved by FEMA and adopted by the City in July 2020, into the Safety Element by reference, as permitted by California Government Code Section 65302.6, to ensure that emergency response and evacuation routes are accessible throughout the City.

Furthermore, to better ensure adequate coordination and services are maintained during future hazardous events, the City plans to develop a COOP and EOP, which will provide procedures that address readiness, mobilization, and contingency planning to allow for uninterrupted delivery of essential functions during disasters. The COOP and EOP aim to save lives, prevent property damage, protect and assist the public with emergencies, and facilitate recovery after a disaster. Additional policies that would address emergency operations and preparedness include Policy S-1.1 and Policy S-1.4 that aim to adopt and maintain a COOP and EOP. Therefore, impacts would be less than significant.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impact relating to emergency response plans. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.8-36)

**Impact 5.8-5: The project site is not in a designated fire hazard zone and could expose structures and/or residences to fire danger. [Threshold H-7]**

The City of Redondo Beach is not in any fire severity zones (Los Angeles 2024). The City has policies in place that would help mitigate or assist in operations where fire may occur. Policy S-9.1 addresses fire services by providing fire prevention, protection, and emergency preparedness services that adequately protect residents, employees, visitors, and structures from fire and fire-related emergencies.

Policy S-9.3 addresses the City's coordination to continue to implement the regional fire protection agreement by continuing to cooperate with fire, paramedic, and emergency operations personnel in adjacent municipalities, the RBFD, and the County of Los Angeles to assist each other in carrying out the existing regional fire protection agreement. Policy S-9.4 addresses new development standards by continuing to enforce and, as necessary, adopt new development standards to reduce fire hazard risks for new and existing development to minimize property damage and loss of life. Therefore, impacts would be less than significant.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impact relating to fire zones. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.8-36)

## 7. Hydrology and Water Quality

**Impact 5.9-1: The proposed project would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. [Threshold HYD-1]**

The proposed project is a regulatory document that sets the framework for future growth and development in the City and does not directly result in development. Before any development or redevelopment activities would occur in the City, all such activities would be required to be analyzed for conformance with applicable local, state, and federal requirements. Therefore, adoption of the proposed project in itself would not lead to the direct development or redevelopment of a specific project. Updates to the Zoning Ordinance and LCP would involve land-use changes that would be consistent with the General Plan Update. Buildout consistent with the proposed project would involve soil disturbance, construction, and operation of developed land uses that could generate pollutants affecting stormwater. Buildout of the proposed project would add 4,956 dwelling units and 5,681,999 nonresidential square feet in the City based on the land use changes proposed under the proposed project (see Chapter 3, *Project Description*). Impacts related to the potential for accidental discharges of hazardous materials into receiving waters are addressed in Section 5.8, *Hazards and Hazardous Materials*.

### Construction

Clearing, grading, excavation, and construction activities associated with future buildout of the proposed project have the potential to impact water quality through soil erosion and increasing the amount of silt and debris carried in runoff. Additionally, the use of construction materials, such as fuels, solvents, and paints, may present a risk to surface water quality. Finally, the refueling and parking of construction vehicles and other equipment on-site during construction may result in oil, grease, or related pollutant leaks and spills that may discharge into the storm drain system.

To minimize these potential impacts, development pursuant to the proposed project must comply with the CGP Water Quality Order 2022-0057-DWQ, which requires the preparation and implementation of a SWPPP. A SWPPP requires the incorporation of BMPs to control sediment, erosion, and hazardous materials contamination of runoff during construction and prevent contaminants from reaching receiving water bodies. Examples of BMPs include jute swales, silt fencing, storm drain

protection, covering of soil and other similar measures designed to slow or stop the flow of water to allow sediment or debris from entering the storm drainage system. The SWRCB mandates that projects that disturb one or more acres of land obtain coverage under the Statewide CGP. The CGP also requires that prior to the start of construction activities, the project applicant must file PRDs with the SWRCB, including a Notice of Intent, risk assessment, site map, annual fee, signed certification statement, SWPPP, and post-construction water balance calculations. The construction contractor is always required to maintain a copy of the SWPPP at the site and implement all construction BMPs identified in the SWPPP. Prior to the issuance of a grading permit, the project applicant is required to provide proof of filing of the PRDs with the SWRCB, which includes preparation of a SWPPP. Categories of potential BMPs that would be implemented for this project are described in Table 5.9-5, *Construction BMPs*.

Construction activities are also regulated under Section 5-7.112 of the RBMC which requires proof of compliance with the NPDES Permit submitted to the City Engineer prior to the issuance of any grading, building or occupancy permits. Submittal of the PRDs and implementation of the SWPPP throughout the construction phase of projects pursuant to the proposed project will address anticipated and expected pollutants of concern as a result of construction activities associated with projects larger than one acre, reducing water quality impacts to less than significant.

Projects that disturb less than one acre must implement an effective combination of erosion and sediment control BMPs listed in Table 13, Minimum Set of BMPs for All Construction Sites, in the LA County MS4 Permit (NPDES No. CAS004001), to prevent erosion and sediment loss and the discharge of construction wastes. These BMPs include but are not limited to preservation of existing vegetation, providing sandbag barriers, water conservation practices, spill prevention and control, and stockpile management. Compliance with these BMPs would ensure that impacts related to construction activities for projects that disturb less than one acre are less than significant. As a result, water quality impacts associated with construction activities would be less than significant.

#### *Jurisdictional Waters and Wetlands*

Future development under the proposed project would also include construction work that could impact USACE and CDFW jurisdictional waters. Under Sections 401 and 404 of the CWA, a permit is required from the USACE, and a Water Quality Certification is required from the Los Angeles RWQCB for USACE jurisdictional waters. Under Section 1600 of the California Fish and Game Code, construction activities in CDFW jurisdiction are regulated by a lake or streambed alteration agreement. Additionally, compliance with construction BMPs in projects' SWPPPs would ensure construction activities would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface water quality related to jurisdictional waters.

#### *Dewatering*

Construction activities under the proposed project may also involve site dewatering. Dewatering is the process of removing unwanted water from excavations such as foundations or basements to enable construction. Any discharge of dewatered groundwater to surface waters must comply with the Los Angeles RWQCB adopted Order R4-2018-0215. Discharges to land would comply with SWRCB's Order No. 2003-0003-DWQ. Additionally, per LACDPW's Construction Site BMP Manual, discharge

of groundwater during dewatering activities to the LACSD sanitary sewer system, street/gutter, ground, or any other location would not be permitted until approved by the LACDPW Engineer. A construction dewatering plan must also be submitted to the LACDPW Engineer for approval, prior to any dewatering discharge. Compliance with these mandated regulations would ensure construction activities would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface water quality related to dewatering.

### Operation

Development resulting from the proposed project may have long-term impacts on the quality of stormwater and urban runoff, subsequently impacting downstream water quality. This development has the potential to increase the postconstruction pollutant loadings of certain constituent pollutants associated with the proposed land uses and their associated features, such as landscaping, parking lots, storage areas, and plaza areas.

Future development under the proposed project would prepare and submit SUSMPs, which would include LID/site design and source control BMPs to address post-construction stormwater runoff management, as required under the Los Angeles County MS4 Permit and RBMC Chapter 7, Stormwater Management and Discharge Control. Selection of LID and additional treatment control BMPs is based on the pollutants of concern for the specific project site and the BMP's ability to effectively treat those pollutants, in consideration of site conditions and constraints.

Policies under the proposed project also encourage the implementation of BMPs and other educational efforts that support maintaining water quality in receiving waters. Policy OS-7.3 in the Open Space Element requires the incorporation of BMPs such as maximizing permeable surfaces, using native landscaping, and installing stormwater gardens for new public and private projects in addition to expanding the application of the City LID stormwater management program in the LCP. For example, a stormwater garden, also known as a rain garden or bioretention cell, is a shallow depression in the ground that's planted with native plants to capture and filter stormwater runoff. Policies in the existing General Plan's Utilities Element also present strategies that help to reduce water quality impacts. Policy 6.2.9 directs the City to examine the feasibility of an improved filtering or purification system to treat collected stormwater prior to its discharge into Santa Monica Bay and the Pacific Ocean at the various drainage outfall points. Policy 6.2.14 encourages providing additional information and education of the proper or improper disposal of debris or materials into the storm drainage system, and Policy 6.3.9 directs the City to ensure continued monitoring and maintenance of water quality in the community's supply of potable water.

Implementation of these measures would ensure that projects effectively retain or treat the water runoff of the 85th percentile, 24-hour storm for pollutants such as bacteria, metals, nutrients, oil and grease, organics, pesticides, sediment, trash, and oxygen-demanding substances prior to discharge off their property. As properties in the City undergo redevelopment, existing properties that do not have water quality BMPs will be replaced with projects incorporating LID BMPs. Therefore, long-term surface water quality of runoff from development in the City would be expected to improve over existing conditions as more LID BMPs are implemented.

In addition to LID BMPs associated with development, the City is part of the Beach Cities Watershed Management Area, which requires the City to identify regional projects to improve water quality in the local receiving waters. Over the next 20 years, the City will contribute to engineering design, construction and operations, and maintenance of regional watershed improvement projects in accordance with the approved EWMP and in partnership with other cities and LA County.

Additionally, as part of the statewide mandate to reduce trash in receiving waters, the City is required to adhere to the requirements of the California Trash Amendments. The requirements include the installation and maintenance of trash screening devices at all public curb inlets, grate inlets, and catch basin inlets. The trash screening devices must be certified trash full-capture systems and must be installed on all inlets by 2030. Furthermore, all development that discharges stormwater associated with industrial activity shall also comply with the requirements of the Statewide General Industrial Permit (Order No. 2014-0057-DWQ), as amended in 2018 by Order No. 2015-0122-DWQ.

Compliance with these existing State, regional, and local plans, goals, policies, and regulations would ensure that impacts to surface water and groundwater quality are less than significant.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impacts relating to surface or groundwater quality. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.9-36)

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**Impact 5.9-2: The proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that it may impede sustainable groundwater management of the basin. [Threshold HYD-2]**

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The City overlies the West Coast Subbasin (West Coast Basin) within the Coastal Plain of Los Angeles Groundwater Basin. Groundwater from the West Coast Basin is actively managed by numerous water agencies and stakeholders, including the West Basin Municipal Water District and WRD. Stakeholders of the Basin agreed to adjudicate water from the Basin with a limiting APA of 80 percent; the City's APA is 4,070 afy from the Basin. Additionally, the West Coast Basin is currently categorized as a very low priority basin by DWR and therefore does not require the implementation of a GSP. Adjudication of groundwater from the basin ensures that excess production is restricted to emergencies. Furthermore, individual development projects under the proposed project would not utilize site-specific wells for groundwater supply. The implementation of LID features would allow for stormwater infiltration and therefore groundwater recharge at project sites.

Additionally, the General Plan Update includes policies that target groundwater recharge in the proposed Open Space Element. Policy OS-7.3 directs development to include BMPs such as maximizing permeable surfaces, using native landscaping, and installing stormwater gardens, on new public and private projects and retrofits to incorporate BMPs, and Policy OS-7.4 directs the City to coordinate with the County, utility companies, and other agencies operating in the City to replenish the groundwater supplies in the region. Through management by the local water districts, development under the proposed project would not result in interference with groundwater recharge or management of the groundwater basin.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impacts relating to impediment of sustainable groundwater management of the basin. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.9-37)

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**Impact 5.9-3: Development under the proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces in a manner which would: Result in a substantial erosion or siltation on- or off-site; Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; Impede or redirect flood flows. [Threshold HYD-3]**

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Development under the proposed project is largely expected to maintain existing drainage patterns and utilize the existing drainage facilities within the public right of way. Current runoff is captured and conveyed by existing City storm drain infrastructure that discharges to County flood control facilities and channels before ultimately reaching the Pacific Ocean. The City is primarily built out, so no major changes in flood flows are anticipated. The City and County have policies in place to require detention systems to mitigate peak flows for certain development projects, and/or if downstream drainage facilities ever become deficient.

### Erosion and Siltation

All potential future development pursuant to the proposed project would be required to implement construction-phase BMPs as well as post-construction site design, source control measures, and treatment controls in accordance with the requirements of the CGP; RBMC Title 5, Chapter 7; the Los Angeles RWQCB MS4 Permit; and the Beach Cities EWMP. As described in Impact 5.9-1, typical construction BMPs include silt fences, fiber rolls, catch basin inlet protection, water trucks, street sweeping, and stabilization of truck entrances/exits. Each new development or redevelopment project that disturbs one or more acre of land would be required to prepare and submit a SWPPP to the SWRCB that describes the measures to control erosion and sedimentation due to construction activities. For projects of less than one acre, the minimum BMPs for construction sites listed in the MS4 Permit would be required.

Once future development projects have been constructed, the MS4 permit requirements for new development or redevelopment projects must be implemented and include site design measures, source control measures, LID, and treatment measures that address stormwater runoff and would reduce the potential for erosion and siltation. LID measures include the use of permeable pavements, directing runoff to pervious areas, and the construction of bioretention areas. Project-specific SUSMPs submitted to the City must include BMPs that are maintained during the operational life of the project in accordance with the Los Angeles RWQCB MS4 Permit. Adherence to the streambed alteration agreement process under Sections 1600 to 1616 of the California Fish and Game Code and 404 and 401 permits, as applicable, would further reduce erosion and siltation impacts that may occur due to streambed alterations.

Additionally, the majority of storm drainage structures, streams, and channels that collect runoff in the City are concrete lined and not susceptible to scour or erosion. For areas that are tributary to streams and may be susceptible to scour, hydromodification requirements, as part of the regional MS4 permit, would ensure that impacts are minimized. Overall impacts to erosion and siltation as a result of development under the proposed project would be less than significant.

### Flooding On- or Off-Site

New development and/or redevelopment and changes in land uses could result in an increase in impervious surfaces, which in turn could result in an increase in stormwater runoff, higher peak discharges to drainage channels, and the potential to cause nuisance flooding in areas without adequate drainage facilities. For proposed development that would include storm drain system improvements that directly connect to Los Angeles County Flood Control systems, hydrology and LID studies would be prepared, reviewed, and approved by LACDPW. LACFCD's Hydraulic Design Manual presents the design criteria to be used for both closed conduits and open channels. Regulated projects must implement BMPs, pursuant to the Los Angeles RWQCB MS4 Permit, including LID BMPs and site design BMPs, which effectively minimize imperviousness, retain or detain stormwater on-site, decrease surface water flows, and slow runoff rates. Additionally, Chapter 14 of the 2006 Los Angeles County Department of Public Works Hydrology Manual includes procedures for requesting Q-allowable, or the maximum stormwater discharges that would be allowed from the proposed development associated with the proposed storm drain connection. Adherence to these regulatory requirements would minimize the amount of stormwater runoff from new development and redevelopment in the City. Therefore, potential future development under the proposed project would not result in flooding on- or off-site, and impacts would be less than significant.

### Stormwater Drainage System Capacity

As stated in the impact discussions above, an increase in impervious surfaces with new development or redevelopment could result in increases in stormwater runoff, which in turn could exceed the capacity of existing or planned stormwater drainage systems.

Development that meets the requirements of Section VI(D)(7)(b) (Section 5-7.113(d) in the RBMC) in the MS4 Permit would trigger the implementation of site design, source control, and stormwater treatment measures to reduce stormwater runoff, in the MS4 Permit. Prior to the issuance of grading permits, the City will require completion and submittal of a SUSMP report for review and approval to ensure that these requirements are met. Stormwater treatment measures must be sufficiently designed and constructed to treat or filter the first 0.75 inches of stormwater runoff from a 24-hour storm event, and postdevelopment peak runoff rates and volumes cannot exceed peak runoff rates and volumes of predevelopment conditions where the increased peak stormwater discharge rate will result in increased potential for downstream erosion. Implementation of the LID requirements and BMPs required by the MS4 Permit and RBMC would reduce the amount of stormwater runoff that is ultimately discharged to the receiving waters. Also, as part of the permitting process, future development would be required to pay drainage fees pursuant to RBMC Section 5-7.107. The fees are used to offset the City's costs of NPDES-related implementation and enforcement.

Furthermore, policies in the Utilities Element of the existing General Plan support the improvement of the City's storm drainage infrastructure. Policy 6.2.3 requires that the approval of new development in the City be contingent upon the ability of the project to be served with adequate storm drainage infrastructure and service. Policy 6.2.5 directs the City to plan and provide for the ongoing construction of upgraded and expanded storm drainage facilities in areas of the city currently underserved by such facilities. Policy 6.2.7 requires that improvements to or expansion of existing storm drainage facilities necessitated by specific new development projects be borne by the project proponent, either through the payment of impact fees or the actual construction of such improvements. These policies would further help to ensure that new development is served by storm drainage facilities.

With implementation of these provisions for new development and redevelopment projects, the proposed project would not result in significant increases in runoff that would exceed the capacity of existing or planned storm drain facilities, and the impact is less than significant.

### Redirecting Flood Flows

The discussion above regarding on- and off-site flooding is also applicable to the analysis of impeding or redirecting flood flows. Since new development projects are required to comply with the MS4 Permit and retain stormwater on-site via the use of bioretention facilities or other stormwater treatment measures, any flood flows would also be detained temporarily on-site, which would minimize the potential for flooding impacts. Impact 5.10-4 discusses the potential for impeding or redirecting flood flows with development in areas within areas at risk of flood hazards. Based on these discussions, impacts related to impeding or redirecting flood flows would be less than significant.

With compliance with the MS4 permit, the City's stormwater requirements, and the implementation of General Plan goals and policies in the Utilities Element which require the City to ensure adequate storm drainage, potential future development under the proposed project would not result in substantial erosion or siltation and would not substantially increase the rate of surface runoff which would result in flooding, impede or redirect flood flows, or exceed the capacity of the drainage system. Impacts would be less than significant.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impacts relating to alteration or addition of impervious surfaces. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.9-39)

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**Impact 5.9-4: The proposed project would not increase the risk of pollutant release due to inundation in flood hazard, tsunami, or seiche zones. [Threshold HYD-4]**

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### Pollutant Release in Flood Hazard Zones

While a majority of land in the City is outside the 100-year flood zone, areas adjacent to the coastline and other portions of the City defined as Zone AE and VE have a 1 percent chance of annual flood hazards, as shown on Figure 5.9-2. All development in these areas would require conformance with FEMA requirements and setbacks to adequately protect structures from flood hazards. Future development within the 100-year flood zones would also be subject to the floodplain requirements in

RBMC Chapter 12, Flood Damage Prevention, which requires new construction to be built above the base flood elevation or be designed to mitigate flooding impacts. Upon completion of a structure in an SFHA, the building must be certified by a registered civil engineer and verified by the community building inspector and City Floodplain Administrator. In general, the standards of construction include provisions for flood risk reduction, including anchoring and flood-resistant materials and construction methods, with the lowest floors elevated at or one foot above the base flood elevation. The City does not allow structures to be built within floodways, i.e., the drainage area necessary for a 100-year floodplain. Compliance with FEMA's National Flood Insurance Program requirements and RBMC requirements would reduce potential flood hazards and ensure that pollutants are not released during flood inundation.

Additionally, several policies from the proposed Safety Element would help to reduce flood risks for new development in the City. Policy S-6.1 encourages coordination between local, regional, State, and federal flood control agencies; Policy S-6.2 promotes public education of flood-control measures; Policy S-6.3 directs the City to ensure that City-owned buildings and infrastructure are fortified against flood hazards; and Policy S-6.5 requires new development in the 100-year or 500-year floodplain to comply with the City's Flood Damage Prevention Ordinance.

Conformance with the FEMA requirements and the provisions of Title 9 Chapter 12, Flood Damage Prevention, of the RBMC would reduce impacts related to flood hazards for new development or redevelopment to less than significant.

**Pollutant Release from Dam Inundation, Tsunamis, and Seiches**

The King Harbor area, including the commercial/visitor accommodations west of Harbor Drive, is in a tsunami hazard zone. Based on the frequency of historical tsunamis, the probability of occurrence of any tsunami during buildout of the proposed project is low. In the unlikely event one does occur, the Redondo Beach Fire Department has recommended evacuation routes, a tsunami inundation map, and tsunami safety and awareness guidelines. Also, the National Weather Service's tsunami warning system would keep residents and businesses up to date on evacuation orders. The proposed Safety Element of the General Plan Update includes Policy S-5.2, which directs the City to obtain information from the U.S. Tsunami Warning System and the Tsunami Ready Communities program to send evacuation notices to community members in the event of a tsunami. Policy S-7.7 would require structures along to the coast to be built or upgraded to withstand strong waves from a storm surge. The City's LCP also requires development within a tsunami inundation zone to provide information concerning the height and force of likely tsunami run-up on the property.

All facilities within King Harbor are required to follow tsunami guidelines and emergency preparedness requirements, in addition to the City's policies that aim to reduce tsunami risks to the extent possible. These measures would reduce impacts to less than significant.

The City is not within proximity to any dam inundation areas, as determined by the DWR's Inundation Maps, and would therefore not be subject to dam breach inundation risks. The City may be subject to impacts from seiches on the Pacific Ocean. The policies and regulations that reduce risks associated with tsunamis would also reduce risks from seiches. For example, Policy S-7.7 would require structures

along the coast to be fortified against waves from a storm surge. Therefore, risks associated with seiches would also be less than significant.

### Pollutant Release Due to Sea Level Rise

Additionally, the City faces increased flooding risks associated with rising sea levels which are expected to increase by 13 to 23 inches on the California coast by 2050. As shown in Section 5.9.3, the proposed Safety Element of the General Plan Update includes policies that aim to locate new development outside of areas at risk of coastal inundation and increase the resiliency of structures within these areas. For example, Policy S-7.1 requires new development of residential buildings and critical infrastructure to be outside of the highest level of sea level rise expected during the life of the project. Policy S-7.4 directs the City to integrate nature-based solutions into sea level rise adaptation strategies, including the construction of living shorelines. Policy S-7.5 would integrate sea level rise projections into the City development and environmental review process. Policy S-7.7 would also help to protect structures from storm surges related to higher tides.

The City's 2020 LHMP includes hazard mitigation actions to help reduce flooding risks associated with coastal flooding, sea level rise, and storm surge. These actions include developing a Marina Climate Resiliency Master Plan, requiring structures along the coast to be built to withstand strong wave action from storm surge (also implemented by proposed Safety Element Policy S-7.7), and upgrading City-owned assets to withstand coastal hazards. The City's LCP also requires wave uprush studies to be submitted to the City for development in the Pier or Harbor area. These policies, strategies, and regulatory requirements would help to reduce the risks of coastal inundation for new development, ensuring impacts are less than significant.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impacts relating to risk of release of pollutants due to project inundation. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.9-41)

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**Impact 5.9-5: The proposed project would not conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan. [Threshold HYD-5]**

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New development and redevelopment under the proposed project would implement the requirements of the Statewide CGP, the Los Angeles County MS4 Permit, and Title 5 Chapter 7, Stormwater Management and Discharge Control, of the RBMC. Furthermore, Industrial development and redevelopment would abide by the Statewide General Industrial Permit. Policies in the proposed Open Space Element also promote efforts to sustainably manage the City's groundwater supply from the West Coast Basin. Policy OS-7.4 directs the City to coordinate with the County, utility companies, and other agencies operating in the City to replenish the groundwater supplies in the region, and Policy OS-7.3 directs development to include BMPs that improve natural groundwater recharge. Additionally, the Utilities Element of the General Plan contains policies that target the protection of groundwater supplies from saltwater intrusion, including Policy 6.7.1, which directs the City to ensure the continued operation, maintenance, upkeep, and expansion (as necessary) of the existing West Coast Basin Barrier Project groundwater (seawater) intrusion barrier. Policy 6.7.3 ensures that any new development

proposed in the area of the existing groundwater (saltwater) intrusion barrier and freshwater injection well facilities is reviewed to prevent potential impacts or damage to the system.

Adherence to these regulations ensures that surface and groundwater quality are not adversely impacted during construction and operation of development under the proposed project. As a result, site development would not obstruct or conflict with the implementation of the Basin Plan or California Ocean Plan. Proposed development would be connected to the City's public water supply, and no development would connect to on-site wells for use of groundwater. As discussed in Impact 5.9-2, increased demand due to development pursuant to the GPU would not adversely impact the sustainable management of the West Coast Basin. Due to its status as a low-priority basin, the West Coast Basin does not have an adopted GSP. The supply of the West Coast Basin is also adjudicated to ensure that stakeholders do not exceed the Allowable Pumping Allocation of the Basin. Therefore, the project would not obstruct or conflict with a water quality control plan or groundwater management plan, and impacts would be less than significant.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impacts relating to conflict with or obstruction of a water quality control plan or sustainable groundwater management plan. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.9-42)

## 8. Land Use and Planning

**Impact 5.10-1: Project implementation would not divide an established community. [Threshold LU-1]**

Division of an established community commonly occurs because of development and construction of physical features that constitute a barrier to easy and frequent travel between two or more constituent parts of a community. In Redondo Beach, SR-1, a north-south highway, bisects the southern portion of the City. Other barriers in the City may include incomplete trails, cul-de-sacs, or noise walls in an existing neighborhood that all require use of an automobile to get around.

The Land Use Element of the proposed project provides policies designed to ensure the prevention of dividing communities. The proposed project includes Policy LU-1.1, which aims to preserve existing residential neighborhood patterns, while balancing development trends and state mandates, Policy LU-3.8, which recognizes corridors and the importance of connectivity throughout Redondo Beach, and Policy LU-4.6, which aims to facilitate linkages to parks, beaches, residential neighborhoods, and commercial destinations.

As noted above, several policies of the proposed project would not only improve connectivity, but compatibility between existing and future development. A primary goal of the proposed project is to retain the City's current character, and several policies of the proposed project address consistency of new development with existing developments using materials, siting, and other design techniques, such as Policy LU-6.14, which requires new development and redevelopment projects to create unique, high-quality places that add value to and are complementary with the community, and Policy LU-3.1, which aims to foster compatibility between land uses to enhance livability and promote healthy

lifestyles. Updates to the Zoning Ordinance and LCP would involve amendments to land-use and development standards that would be consistent with the General Plan Update.

No aspect of the proposed project would divide the existing City. To the contrary, the proposed project includes provisions that directly address land use connectivity, compatibility, and encroachment of new development on existing neighborhoods and land uses. Therefore, the proposed project would not result in an impact regarding the division of an established community.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impacts relating to physical division of an established community. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.10-12)

### 9. Noise

**Impact 5.11-3: The proposed project would not expose people residing or working in the project area to excessive noise levels within the vicinity of a private airstrip or an airport land use plan. [Threshold N-2]**

Aircraft overflight occurs regularly as the City is near the Hawthorne Municipal Airport (two miles northeast), Torrance Municipal Airport (two miles southeast), and Los Angeles International Airport (three miles north). As previously described, the Los Angeles County Airport Land Use Commission's Airport Land Use Plan (adopted in 1991 and revised in 2004) covers all of the public airports in Los Angeles County. The Los Angeles County Airport Land Use Commission is responsible for promoting land use compatibility around the County's airports in order to minimize public exposure to excessive noise and safety hazards, and the Commission's Los Angeles County Airport Land Use Plan identifies noise compatibility zones in the form of airport noise contour graphics that are intended to prevent development that is incompatible with airport operations. No portions of the City are within the 65 dBA noise contours, or any noise contours, of any of these airports. Therefore, people within Redondo Beach would not be exposed to excessive noise levels and there would be no impact.

**Finding.** The proposed project would have no significant direct, indirect, and cumulative impacts relating to airport noise. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.11-45)

### 10. Population and Housing

**Impact 5.12-2: Project implementation would not result in displacing people and/or housing. [Threshold P-2]**

Redondo Beach is developed with a variety of land uses, and the proposed project includes minor changes in land use. Changes would occur on lands that offer opportunities for enhancement and in areas where business prosperity, job opportunities, and civic activity can be strengthened. These land use changes are intended to shape future development to protect existing residential neighborhoods, economically successful commercial and industrial districts, and parks and open spaces. Additionally,

some of these land use changes also seek to support transit-oriented development (TOD) principles and revitalization efforts of some commercial centers. Updates to the City's Zoning Ordinance, Zoning Ordinance for the Coastal Zone, and LCP would include modifications for consistency with the proposed Focused General Plan Update and would not involve land-use changes that would cause a greater increase in population and employment growth than what is considered under the Focused General Plan Update.

Land use changes under the proposed project would increase opportunities for housing in the City—for example, by converting commercial designations to mixed-use and increasing residential density in existing residential areas. The proposed Land Use Plan would provide land use designations for a variety of housing types and provide for additional residential opportunities throughout Redondo Beach. The proposed project would accommodate 4,956 new housing units compared to existing conditions, exceeding the RHNA goal of 2,490 new units. Therefore, impacts to the displacement of people and/or housing would be less than significant as a result of the proposed project implementation as existing residential uses within proposed commercial zones shall be considered legally conforming.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impacts relating to the displacement of people. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.12-12)

### 11. Public Services

**Impact 5.13-1: The proposed project would introduce new structures and residents into the Redondo Beach Fire Department service boundaries, thereby increasing the requirement for fire protection equipment and personnel. [Threshold FP-1]**

The proposed project is a regulatory document that sets the framework for future growth and development in the City and does not directly result in development. Future development and population growth in the City accommodated by the proposed project would increase the demand for the provision of local fire services including new fire apparatuses and personnel to maintain adequate response times. The proposed project would result in an increase of 8,667 people by 2050 buildout, resulting in a total of 78,978 people in the City.

RBFD did not identify any deficiencies in its department, and there are no intended improvements or expansions of the existing fire stations within Redondo Beach (Regan 2023). Implementation of the proposed project would require additional staffing at Stations #1 through #3 to continue delivering the current level of service to existing and new residents and businesses. Implementation of Policy S-9.2 will ensure that equipment and personnel keep pace with service demand.

Funds for facilities, equipment, and service personnel come from the City's property taxes. Funding from property taxes would be expected to grow roughly proportional to any increase in residential units, businesses, and/or industrial/manufacturing in Redondo Beach. The additional demand for fire services and protection generated in the City would be satisfied through property taxes. Development

in the City would also be reviewed by RBFD for compliance with applicable provisions of the California fire and residential codes.

Furthermore, policies S-9.1 through S-9.6 in the Safety Element of the Redondo Beach General Plan would ensure adequate protection of public health and safety related to fire and emergency services, by adopting new development standards to reduce fire hazard risks and support programs that assist in the reduction of fires. Compliance with these policies will ensure that the implementation of the proposed project would result in a less than significant impact. Funding for additional staff, equipment, and facilities to serve the City's future growth in residential/commercial/industrial developments and population would come from the City's property taxes. Therefore, impacts to fire protection and emergency services and facilities would be less than significant.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impacts relating to fire protection services. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.13-7)

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**Impact 5.13-2: The proposed project would introduce new structures, businesses, and residents into the Redondo Beach Police Department service boundaries, thereby increasing the requirement for police protection equipment and personnel. [Threshold PP-1]**

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As the City's population and employment growth increases, the need for police services is expected to grow. The Redondo Reach General Plan would result in an increase of 8,667 people by 2050 buildout, resulting in total of 78,978 people in the City.

RBPD's response time target to all calls is 30 seconds from the time of call. As noted above, the average time for Priority One calls was 2:54 minutes, and the average time for Priority Two calls was approximately 4:31 minutes. Increases in population in Redondo Beach have the potential to further impact service response times below the target goal established by the RBPD. If calls for service increase and exceed the capacity of RBPD's existing workforce, additional staff would be needed, and ongoing revenue would be needed to fund additional staff. The additional officers would not be hired all at the same time because the growth in population would occur over time. Moreover, the hiring of additional officers would be dependent on the department's assessed needs, based primarily on the growing number of calls for service or decreases in average response times in the future.

Funds for facilities, equipment, and service personnel come from the City's property taxes, the City's general fund, and are supplemented by State and Federal grant programs. Funding would be expected to grow roughly proportional to any increase in residential units, businesses, and/or industrial/manufacturing businesses in Redondo Beach. The additional demand for police services and protection generated within the City would be satisfied through property taxes and the general fund. Additionally, as identified in the service letter provided by RBPD, there are no existing deficiencies in the police department and the General Plan Update would not affect RBPD's ability to provide service (Sprengel 2024). Therefore, impacts to police services and facilities would be less than significant.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impacts relating to police protection services. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.13-11)

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**Impact 5.13-3: The proposed project would generate new students who would impact the school enrollment capacities of area schools. [Threshold SS-1]**

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The proposed project is a regulatory document that sets the framework for future growth and development in the City and does not directly result in development. Implementation of the proposed project would result in the development of additional dwelling units and an increase in population, resulting in an increase in student population in the City, which is served by RBUSD.

School districts use district-specific rates to project the number of students that will be generated by new residential development so they can plan for future facilities expansions or constructions. According to the Fee Justification Study prepared for RBUSD, by the 2028/2029 school year, the district is projected to have surplus capacity available throughout the school district.

The proposed project would result in an increase of 4,956 residential dwelling units. Of the 4,956 dwelling units, 1,408 would accommodate single family dwelling units and 3,548 would accommodate multi-family dwelling units. Therefore, based on RBUSD's established student generation rates shown in Table 13-4, implementation of the proposed project would result in approximately 1,751 students, which would include 823 elementary students, 383 middle school students, and 545 high school students. The City is served by eight elementary schools, two middle schools, two high schools, one adult school, and one alternative education school; these existing schools could likely serve these new students because districtwide, RBUSD has available capacity for additional students and historically the enrollment capacity has remained consistent (see Table 5.15-8). Additionally, RBUSD expressed that it may increase classrooms at the existing elementary schools to accommodate full-day kindergarten programs, which would continue to increase school and districtwide capacity (Naile 2023).

If RBUSD needs to expand and construct new facilities to accommodate the growth generated by buildout of the Redondo Beach General Plan, funding for new schools would be obtained from the fee program pursuant to SB 50, and state and federal funding programs. Pursuant to Section 65996 of the Government Code, payment of school fees is deemed to provide full and complete school facilities mitigation. At the general plan level of analysis, it is speculative and infeasible to evaluate project-specific environmental impacts associated with the specific construction of future school facilities since specific sites and time frames for development are unknown. When specific projects are necessary to meet the growth demands from buildout of the proposed project, the appropriate level of analysis required under CEQA would be conducted by the RBUSD. Furthermore, policies in the Land Use Element would ensure adequate school services, including Policies LU-1.5 and LU-1.13. Therefore, buildout of the proposed Redondo Beach General Plan would result in a less-than-significant impact related to schools.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impacts relating to school services. Accordingly, no changes or alterations to the proposed project were

required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.13-17)

**Impact 5.13-4: The proposed project would generate new residents who would impact the library capabilities of the City. [Threshold LS-1]**

The buildout of the proposed project would result in an increase in population and thus, a demand for library services. As described by Redondo Beach Library personnel, the two libraries are approximately 62,000 square feet and have a collection of 207,000 items. The Redondo Beach Library continues to assess the use of its materials and prepares a strategic plan. Therefore, any new increase in library uses would be assessed and addressed in the strategic plan (Vinke 2023).

Funding for library services comes primarily from the City's property taxes as well as library fines; fees collected from patrons; and state, federal, or local government aid. Therefore, as development occurs, property taxes would grow proportionally with the proposed new residents. Additionally, access to online resources, including e-books and audiobooks, are available at the Redondo Beach Libraries. Therefore, impacts to library facilities would be less than significant.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impacts relating to library services. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.13-19)

### 12. Recreation

**Impact 5.14-1: The proposed project would generate additional residents that would increase the use of existing park and recreational facilities. [Threshold R-1]**

The proposed project is a regulatory document that sets the framework for future growth and development in the City and does not directly result in development. Updates to the Zoning Ordinance and LCP would involve land-use changes that would be consistent with the General Plan Update. Buildout of the proposed project would allow for the development of up to 4,956 dwelling units, which would result in an estimated population of 8,667 residents. The proposed project would increase the existing population in the City from 70,311 residents to 78,978 residents by buildout. This increase in population would increase the use of existing park and recreational facilities and result in a demand for new parks.

Each jurisdiction determines the appropriate park standard based on the guidance provided by Section 66472 of the California Government Code, commonly referred to as the Quimby Act, which allows a City to require a standard of 3 acres of parkland per 1,000 residents. Currently, Redondo Beach has 148.8 acres of developed parkland. This excludes recreational opportunities at schools and other private facilities. As shown in Table 5.14-2, *Demand for Public Parks in the City at General Plan Buildout*, based on its current population of approximately 70,311, there are 2.12 acres of existing park land per 1,000 people; as a result, the City currently does not meet the recommended standard of 3 acres per 1,000 people. The proposed project would result in an anticipated increase of 8,667 people which

results in a demand for approximately 26 additional acres of parks to accommodate Redondo Beach's population at buildout.

The proposed project identifies two future opportunities to develop park facilities, totaling 38 acres, which include 34 acres associated with Southern California Edison Right-of-Way (includes portions used for nursery and turf areas that are not accessible to the public)and 3.2 acres of green spaces such as Wylie Sump, Don Owens Parkette and Edward P Greene Parkette. In addition, the AES Powerplant site may be redeveloped with non-industrial uses as it represents the largest opportunity for the City to reclaim land for parks and open space. While the powerplant is no longer operational, demolition, clean up, and other site mitigation could take time to achieve, and as a result, the site may not be available for conversion to public parkland during the 20-year planning horizon of this element. Furthermore, new residential subdivision development would be required to dedicate parkland or pay an in-lieu fee, as included in Policy OS-5.1, and OS-5.3, which would allow the for the establishment of financing districts to fund the acquisition, development, and maintenance of parkland and recreational facilities. The availability of new facilities would prevent the accelerated physical deterioration of existing facilities. Additionally, there are a number of other potential park and recreational facilities in the City, such as trails, recreational programs and amenities, and joint-use school facilities, to serve the proposed residents. Additionally, the proposed project includes several policies, OS-2.1, OS-2.5, OS-5.5, and OS-5.6, which support development of a variety of park types, upgrade existing facilities, and finding alternate funding to build new facilities. Therefore, with development of additional park facilities on the aforementioned opportunity sites, dedicated parkland or in-lieu fees as well as the goals, polices and implementation actions included as part of the proposed project, impacts would be less than significant.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impacts relating to the use of existing park facilities. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.14-15)

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**Impact 5.14-2: Project implementation would result in environmental impacts to provide new and expanded recreational facilities. [Threshold R 2]**

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Based on the City's population growth and availability of funds, portions of undeveloped land would be improved as parks and recreational facilities to provide residents with new recreational opportunities while meeting the parkland standard of 3 acres per 1,000 residents. Parks are also a permitted use under other land use designations (e.g., residential land uses), which could result in the development of additional parkland opportunities outside of park-designated parcels.

The proposed project identifies two future opportunities to develop park facilities, which include 34 acres associated with Southern California Edison Right-of-Way (includes portions used for nursery and turf areas that are not accessible to the public) and 3.2 acres of green spaces such as Wylie Sump, Don Owens Parkette and Edward P Greene Parkette. Development and operation of future new or expanded parks and recreational facilities may have an adverse physical effect on the environment, including impacts relating to air quality, biological resources, lighting, noise, and traffic. Environmental impacts associated with the construction of new and/or expansions of existing recreational facilities in

accordance with the proposed land use plan are addressed separately. Construction-related air quality and noise impacts of the proposed project are described in Section 5.3, *Air Quality,* and Section 5.13, *Noise*. Addressing the site-specific impacts of these parks at this time is beyond the scope of this EIR. Subsequent environmental review for individual park developments would be required. Further, potentially adverse impacts to the environment that may result from the expansion of parks and recreational facilities pursuant to buildout of the proposed land use plan would be less than significant upon the implementation of the Redondo Beach General Plan policies, such as Policy OS-2.1 and OS-2.5, and existing federal, state, and local regulations. Consequently, the proposed project would not result in significant impacts relating to new or expanded recreational facilities, and impacts would be less than significant.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impacts relating to construction or expansion of recreational facilities. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.14-15)

### 13. Transportation

**Impact 5.15-3: The proposed project would not result in a substantial increase in hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). [Thresholds T-3]**

The proposed project has been prepared at a programmatic level and does not propose any incompatible uses that would significantly increase hazards. Future development would undergo an extensive review process at the City to ensure consistency with adopted standards, including site plan review, and environmental review. Therefore, future development projects will be subject to the detailed project-level reviews, and any potential for hazards associated with geometric design features would be addressed through the environmental and site plan review of individual projects to include the provision of safe access for vehicles, pedestrian, and bicyclists, which would incorporate standards for adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls to protect pedestrian and enhance bicycle safety. Furthermore, the SBBMP safety policies target bicycle safety, bicycle facility improvements and bicycle-transit integration. This impact is considered to be less than significant for the proposed project and no mitigation is required.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impacts relating to hazards caused by geometric design features. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.15-45)

**Impact 5.15-4: The proposed project would not result in inadequate emergency access [Threshold T-4]**

The proposed project has been prepared at a programmatic level and does not include elements that would impede emergency vehicle access. Future development projects would be required to be reviewed and evaluated for emergency access, and other project-level reviews in the context of design and environmental review. Policy S-4.3 of the Safety Element would ensure that new development,

especially high-occupancy facilities, allow for evacuation of occupants through stabilized corridors and access points in the event of an emergency. Public roadways and buildings would require conformance to City and Fire Code standards for access. Additionally, a review of emergency access is included as part of the City's Design Review process. At that time, any specific improvements needed to maintain adequate emergency access would be identified and required of the development. Since all future projects will undergo such reviews and requirements to assess the potential for effects to emergency access, this impact is considered less than significant for the proposed project, and no mitigation is required.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impacts relating to emergency access. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.15-45)

### 14. Utilities and Service Systems

**Impact 5.17-1: Existing and/or proposed facilities would be able to accommodate project-generated wastewater infrastructure demands and not require or result in the relocation or construction of new or expanded wastewater treatment, the construction or relocation of which could cause significant environmental effects. [Threshold U-1]**

Implementation of the proposed project would require construction of new sewer infrastructure where existing sewer lines are not sufficient to accommodate the increased demand. These determinations would be made on a project-by-project basis, including site-specific sewer flow monitoring and hydraulic sewer analysis. Although the City's SSMP does not include criteria for determination of hydraulic capacity, typical criteria include D/d (flow depth over diameter ratio) of not greater than 50 to 75 percent. The CIP process along with the City's sewer impact and sewer user fees facilitates and funds City-constructed upgrades to sewer pipelines based on flow depth assumptions.

As noted above, the City's sewer infrastructure has struggled to meet the demand of new ADUs and higher density housing conversions. Preparation of a Sewer Master Plan would help prioritize future sewer upgrades and support the buildout of the City. Part of this process would include obtaining current sewer flow conditions to assist with capacity evaluations. All development or redevelopment projects resulting in changes to existing sewer flows would be required to perform sewer flow monitoring tests at specific manholes approved by the Public Works Department to confirm existing flow depths, D/d values and impacts of the proposed development on the existing sewer system. The developer or applicant would be responsible for any sewer upgrades needed to support the project while maintaining the sewer capacity for existing customers (Fuscoe 2024). As directed by Policies 6.1.7, 6.1.8, and 6.1.9 in the existing Utilities Element, the Sewer Master Plan should include a sewer rate study that would review existing sewer impact and user fees and connection fees (capital facility fee) to determine if adjustments and changes are required in order for the City to collect the adequate fees to maintain existing service and plan accordingly for future regional improvements.

The construction of on-site and off-site sewer lines and associated improvements would primarily include trenching for the pipelines. All construction would be performed in accordance with the

Construction General Permit, which would include the preparation of a Stormwater Pollution Prevention Plan if the area of disturbance exceeds one acre. Any work that may affect services to the existing sewer lines would be coordinated with the City and LACSD. LACSD shall review all future developments within the City to determine whether sufficient trunk sewer capacity exists to serve each development and if the LACSD's facilities would be impacted by the development. This review is accomplished through the LACSD's Will-Serve Program. A Will-Serve letter from LACSD would include information regarding the anticipated wastewater flows that would be generated by the proposed development, along with a statement of whether the LACSD's trunk sewer system would have capacity to accept the flows. The most recent data demonstrates that peak flows throughout the City are well below the design capacity of the LACSD trunk lines, indicating that there is sufficient capacity for growth, as stated in LACSD's response to the NOP for the proposed project (see Appendix A). The City also requires the approval of new development to be contingent upon the ability of the proposed development to be served by sewer infrastructure under Policy 6.1.5 in the existing Utilities Element.

Septic systems in the City are regulated under Section 5-7.111, of Title 5, Chapter 7, of the RBMC. While septic systems are permitted in the City, it is unlawful to leave, deposit, discharge, dump, or otherwise expose any chemical or septic waste to precipitation in an area that discharges to City streets or MS4. Septic systems are also regulated by the 2022 Plumbing Code (Title 24, Part 5 of the California Code of Regulations), which is adopted with amendments into the RBMC as Title 9, Chapter 5.

Furthermore, a Construction Management Plan or equivalent, which would ensure safe pedestrian access as well as emergency vehicle access and safe vehicle travel in general, would be implemented to reduce any temporary pedestrian and traffic impacts occurring as a result of construction activities from future development of wastewater facilities. Title 3, Chapter 14 of the RBMC requires construction activities in the right-of-way to obtain an encroachment permit. Compliance with LACSD procedures and City policy would ensure that impacts associated with the potential future construction of wastewater infrastructure would be less than significant.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impacts relating to construction and/or expansion of wastewater treatment facilities. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.17-14)

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**Impact 5.17-2: Project-generated wastewater could be adequately treated by the wastewater service provider for the project. [Threshold U-3]**

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Buildout of the proposed project would result in the addition of 4,956 dwelling units and 5,681,999 square feet of nonresidential uses. In lieu of City-specific sewer generation factors, the City of Los Angeles' "Sewerage Facilities Charge and Sewage Generation Factors for Residential and Commercial Categories" was used to estimate the net increase in sewer flows as a result of the General Plan buildout. Table 5.17-2, Proposed Project Sewer Generation, shows how the increases in dwelling units and nonresidential square footage under the proposed land use plan would increase sewer flows.

The buildout of the proposed project as a result of the proposed land use plan is estimated to result in an additional 960 acre-feet per year (afy) (0.86 million gallons per day) or approximately 0.86 mgd of sewer flows. These estimates are considered conservative since the available unit flow factors from the City of Los Angeles' Sewerage Facilities Charge are generalized for a limited number of land use categories. More information about the assumptions used to generate these sewer flow factors is provided in Appendix B and D of Appendix F.

Additionally, the projected increase in sewer flows shown in Table 5.17-2 is lower than estimates provided by LACSD in their formal comment letter associated with the Notice of Preparation (NOP) (See Appendix F). LACSD estimated that the General Plan Update would generate up to 2.8 mgd, but the calculations in Table 5.17-2 take into account a more detailed land use breakdown and assume lower sewer generation rates due to more recent trends in water use. Water demand rates have dropped significantly over the past decade due to drought caused water-saving requirements, improvements in water efficiency for new construction, and recognition that higher density residential tends to utilize less water per unit than other residential types. In general, local water providers have made significant strides to analyze and provide more current water demands influenced by these factors while sewer flow projections have remained conservative. In addition to conservation trends, legislation has also resulted in lower water demands, which in turn result in lower sewer demands. SB 1157 requires the standard for indoor water usage to be no more than 55 gallons per capita per day (gpcd) currently and reduces it to 47 gpcd in 2025. Based on these trends, agencies may produce water demand estimates that are lower than the sewer flow projections for the same project. Therefore, the City of Los Angeles' sewer generation rates were utilized as they are more reflective of current water and sewer demands.

While the land use plan under the proposed project is expected to increase sewer flows by approximately 0.86 mgd, this would be within the JWPCP's remaining treatment capacity of 156.9 mgd. Discharges from the JWPCP and its associated wastewater collection system and outfalls are required to comply with the Plant's NPDES Permit (NPDES No. CA0053813, Order No. R4-2023-0181). As development occurs, sewer flow increases would be evaluated alongside JWPCP's other service areas.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impacts relating to wastewater treatment. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.17-15)

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**Impact 5.17-3: The proposed project would not require the relocation or construction of new or expanded water facilities the construction or relocation of which could cause significant environmental effects. [Threshold U-1]**

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Buildout of the proposed project would add 4,956 dwelling units and 5,681,999 nonresidential square feet in the City, based on the land use changes proposed under the General Plan Update (see Chapter 3, Project Description). The City of Los Angeles' "Sewerage Facilities Charge and Sewage Generation Factors for Residential and Commercial Categories" was utilized to estimate changes in water demand associated with the changes in land use. Each of the proposed General Plan land uses was aligned to land use types listed on the sewerage facilities sheet and multiplied by 110 percent to yield a conservative indoor and outdoor water demand. Table 5.17-7, Net Change in Water Demand Under

the Proposed Project, shows the net change in water demand as a result of the proposed land use changes. As shown in the table, water demand would increase by 1,056 afy under proposed conditions.

Projects under the General Plan Update would require the construction of new water infrastructure where existing water lines are not sufficient to accommodate the increased supply demands. These determinations would be made on a project-by-project basis because development projects in the City would be required to obtain a Will-Serve letter from Cal Water, pay connection fees, and undergo site-specific fire-flow tests and hydraulic pressure analyses.

The Will-Serve process requires the applicant to provide a detailed description of the proposed project, including the existing water demands and the proposed water demands. Based on the increased demand, connection fees will be applied to ensure the water agency collects funds to provide the additional demand while maintaining services to existing consumers and set aside reserves for future upgrades where needed. The results of the fire flow and hydraulic pressure analyses determine the on-site and off-site improvements required to ensure proper water delivery and fire flow to the project site while maintaining services to existing clients. Cal Water typically requires a minimum of 20 psi (pounds per square inch) as a lower limit of pressure within the water pipeline during fire suppression operations. This ensures that firefighters have access to water of sufficient pressure. Additionally, the American Water Works Association recommends a normal static pressure of 60 to 75 psi throughout the water system. A minimum normal operating pressure of 35 to 45 psi is typically permitted for peak-hour flow conditions. Maximum allowable velocities within the pipelines range from 5 to 8 feet per second for peak-hour scenarios, and 10 to 12 feet per second for fire suppression operations. This process covers both potable water systems and recycled water systems.

Future improvements to the City's water system may include upsizing water lines on-site and off-site and the additions of boosters in low-pressure areas. Additionally, the 2025 UWMP for the Hermosa-Redondo District would be required to incorporate the proposed land use changes under the General Plan Update into its water demand and supply projections out to 2050.

Policies in the Utilities Element of the existing General Plan also ensure that new development is served by water infrastructure. For example, Policy 6.3.1 directs the City to provide adequate water supply, transmission, distribution, and storage throughout the City, while Policy 6.3.2 would ensure that these systems are upgraded and expanded as necessary to meet the demands of new development, and Policy 6.3.3 directs the City to replace and maintain these systems as necessary. Policy 6.3.5 also requires that the approval of new development be contingent on the ability of the development to be served by adequate water infrastructure and service. Policy 6.3.7 requires new development to pay its fair share for water supply and conveyance infrastructure through the payment of impact fees or by the actual construction of the necessary physical improvements.

Other existing State regulations and policies would also ensure that new development provides water service that meets adopted water conservation requirements. For example, new construction would be required to comply with the water-efficiency requirements of CALGreen, California Plumbing Code, and the City's MWELO. New construction for both residential and commercial land uses typically achieves a reduction in water usage rates of 20 percent through compliance with these regulations. Additionally, projects that meet the criteria under California Water Code Section 10912 would be

required to prepare a WSA that demonstrates that project water demands would not exceed water supplies. Furthermore, residential, commercial, and industrial water usage can be expected to decrease in the future as a result of the implementation of AB 1668 and SB 606, which set new standards for indoor and outdoor residential water use, commercial water use for landscape irrigation with dedicated meters, and water loss standards.

The construction of the on-site and off-site water lines and associated improvements would primarily include trenching for the pipelines. All construction would be performed in accordance with the Construction General Permit and associated requirements. Any work that may affect services to the existing water lines would be coordinated with the City and Cal Water, including the obtainment of encroachment permits from the City for all improvements within the public right-of-way. When considering impacts resulting from the installation of any required water infrastructure, all impacts are of a relatively short-term duration and would cease once the installation is complete. Therefore, impacts with the expansion of water infrastructure to serve the proposed project would be less than significant.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impacts relating to construction of new or expanded water facilities (potable and nonpotable). Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.17-37)

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**Impact 5.17-4: Available water supplies are sufficient to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. [Threshold U-2]**

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As shown in Table 5.17-4, the Hermosa-Redondo District estimates that from 2020 to 2045 water supply will decrease from 11,153 afy to 10,757 afy. Cal Water plans to purchase less imported water from WBMWD and rely more on groundwater from the West Coast Subbasin. This trend is a result of Cal Water's plans to maximize the use of its groundwater and recycled water supplies. The projected purchases from WBMWD shown in Table 5.17-8, *Purchased Water Supply*, are the differences between projected demand and other projected (groundwater and recycled water) supplies. The projected groundwater supplies match the Cal Water's total allowable pumping allocation of 4,070 afy.

The WBMWD Draft 2020 UWMP states that it will be able to serve 100 percent of projected demands in normal, single-dry, and multiple-dry years (WBMUD 2021). Because of this, Cal Water expects that, under all hydrologic conditions, purchased water supplies, in combination with groundwater and recycled supplies will fully meet future demands. Cal Water has purchased up to 10,450 afy of imported water through the WBMWD (as shown in Table 5.17-4). Table 5.17-8 shows the projected water supplies from Cal Water's 2015 UWMP. As shown in Table 5.17-8, Cal Water projected purchasing up to 8,527 afy by the year 2040 within its 2015 UWMP (Cal Water 2016).

The proposed project would result in an increase of 1,056 afy at buildout when compared to the current General Plan. As shown in Table 5.17-8, this increase is within the conservative residual water supply numbers available to Cal Water from WBMWD if needed.

New construction is also subject to a number of regulations and policies that would further reduce water use. For example, developments would be required to comply with the water efficient requirements of CALGreen, California Plumbing Code, and the City's MWELO. New construction for both residential and commercial land uses typically achieve a reduction in water usage rates of 20 percent through compliance with these regulations. Also, Policy OS-7.1 in the proposed Open Space and Conservation Element directs new development to adopt the most efficient available water practices. The City seeks to improve public education of water conservation practices through Policy OS-7.2 and improve coordination with its water purveyors to promote the most efficient operation and maintenance of the City's water supply, transmission, distribution, and storage system and facilities through Policy 6.3.5 in the existing Utilities Element.

As documented in Tables 5.17-5, the Hermosa-Redondo District can meet all customers' demands during normal year, single dry year, and multiple dry year conditions with excess water available. In addition, the District will continue to implement and expand its water conservation program, which includes water efficiency rebates to residential and commercial customers, water waste prevention ordinances, conservation pricing, and public education and outreach.

Water supplies would be available to meet the demand of the proposed project and therefore impacts would be less than significant.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impacts relating to water supply. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.17-38)

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**Impact 5.17-5: Existing and/or proposed facilities would be able to accommodate development pursuant to the proposed project and not require or result in the relocation or construction of new or expanded storm water drainage, the construction or relocation of which could cause significant environmental effects. [Threshold U-1]**

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The City is primarily built-out with buildings, roadways, pavement, and other impervious surfaces therefore no new sources of stormwater or flood flows are anticipated. Current runoff is captured and conveyed by existing City storm drain infrastructure throughout the City before discharging to County flood control facilities and channels and ultimately reaching the Pacific Ocean. New land development consistent with the proposed project would connect to the existing drainage facilities within the public right of way. Additionally, existing City and County regulations would ensure that new development and redevelopment does not exceed the capacity of storm drainage facilities.

For example, per the requirements of the LACDPW, as detailed in the Los Angeles County Hydrology Manual and the Los Angeles County Hydraulic Design Manual, development under the proposed project would be required to have site-specific hydrology and hydraulic studies to determine the capacity of the existing storm drain systems and project impacts on such systems prior to approval by the LACDPW. Development under the proposed project would be required to comply with site-specific "allowable discharge rates" that limit post-project peak-flow discharges compared to existing conditions, thus minimizing the potential for flooding on- or off-site and exceedance of the capacity

of existing or planned stormwater drainage systems. The hydrology and hydraulic studies must be submitted to the County for review and approval prior to the issuance of grading permits.

Development projects would also be required to prepare and submit a SUSMP per the MS4 permit and Section 5-7.113 of the RMBC, which would include applicable low impact development requirements in the MS4 permit and Low Impact Development Standards Manual. Projects would be designed to control pollutants, pollutant loads, and runoff volume as reasonably feasible by controlling runoff from impervious surfaces through infiltration, evapotranspiration, bioretention, and/or rainfall harvest and use. The final BMPs to be implemented for the proposed project would be determined through the City's review of the SUSMP, which would occur during the City's building plan check process. Additionally, the proposed project would incorporate into the project a stormwater mitigation plan, including the BMPs necessary to control stormwater pollution from project operations as set forth in the SUSMP. Structural or treatment control BMPs in project plans would meet the design standards in the SUSMP and MS4 permit. The project developer would also provide verification of maintenance provisions for treatment and structural control BMPs.

Furthermore, the City's policy on flood control requires that developers seeking to construct a multifamily residential project of more than four units or a commercial project of more than one acre will be allowed to discharge one cubic foot per second per acre of site area. Detention systems would be required, when necessary, to mitigate the drainage impacts.

Moreover, policies within the existing Utilities Element also ensure that new development is adequately served by storm drainage utilities. For example, Policies 6.2.1 and 6.2.2 require the City to provide, operate, maintain, and repair storm drainage facilities in the City. Policy 6.2.3 requires that the approval of new development be contingent upon the ability of the development to be served with adequate storm drainage infrastructure. Policy 6.2.5 also directs the City to upgrade and expand storm drainage facilities for areas currently underserved by such facilities. Policy 6.2.7 would ensure that expansions for service to new development are paid for by the project proponent.

In addition, the specific location and design of future storm drainage systems (new or expanded) required to provide services in accordance with the proposed project are not known at this time, and therefore it would be speculative to provide environmental analysis for construction-related impacts. Improvements would also be subject to the proposed General Plan goals and policies; federal, state, and local regulations; and applicable mitigation measures as detailed in each topical section of this Draft PEIR. Therefore, construction-related impacts are concluded less than significant.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impacts relating to relocation or construction of new or expanded storm drainage facilities. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.17-49)

**Impact 5.17-6: Existing and/or proposed facilities would be able to accommodate project-generated solid waste, and the proposed project would comply with related solid waste regulations and reduction goals. [Thresholds U-4 and U-5]**

The baseline solid waste disposal for the City (2022-2023) is estimated to be 78,704 tons. The existing (2023) service population in Redondo Beach is assumed to be 98,949, which accounts for employees and residents. Therefore, the baseline waste generation rate for the City is 0.8 tons/service population/year. The service population of the City under buildout of the General Plan is projected to be 115,605 residents and employees (see Table 3-4, *Summary of Existing and Proposed Land Uses*). Using the City's baseline waste generation rate, the anticipated waste generation for the City per year under buildout of the General Plan by 2050 is 92,484 tons.[1] This represents a net increase of 13,780 tons of waste by 2050. This assumes that the current diversion rate for Redondo Beach remains the same. It is likely that with the expansion of organics and recycling programs, the diversion rate would increase in the future, resulting in a decrease in solid waste landfill disposal.

A total of 13,780 tons/year would average about 46 tons/day (assuming 300 disposal days/year). This increase would be approximately 0.2 percent of the current excess capacity of 24,513 tons/day at the landfills listed in Table 5.17-10. In addition, these calculations conservatively assume that current diversion rates remain the same and there is no increased diversion rate for organics and recycling.

Furthermore, all development pursuant to the proposed project would comply with Section 4.408 of the 2022 California Green Building Code Standards, which requires that at least 65 percent of nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. The California Building Code and Redondo Beach Municipal Code also require a construction and demolition materials management plan prior to issuance of building permits for large projects. Furthermore, project-related construction and operation phases would comply with the following federal, state, and local laws and regulations that govern solid waste disposal:

- The Resource Conservation and Recovery Act of 1976 and the Solid Waste Disposal Act of 1965, which govern solid waste disposal.
- AB 939 (Integrated Solid Waste Management Act of 1989; Public Resources Code 40050 et seq.), which required diversion of 50 percent of waste from landfills and required each county to provide landfill capacity for a 15-year period.
- AB 1327 (California Solid Waste Reuse and Recycling Access Act of 1991) which requires local agencies to adopt ordinances mandating the use of recyclable materials in development projects.
- AB 1826, which mandates that businesses that generate two or more cubic yards of solid waste, recycling, and organic waste combined per week to start recycling organic waste.
- AB 341 that mandates recycling for commercial and multifamily residential land uses as well as schools and school districts. Businesses and housing that includes five or more units must also arrange for organic waste recycling services if they generate two or more cubic yards per week of

[1] 0.8 tons per service population per year * 115,605 service population = 92,484 tons per year

solid waste (including recycling and organic waste), in accordance with AB 1826. Organic waste generation would be reduced in line with the targets set by SB 1383.

Additionally, the policies listed in the City's existing Solid Waste Management and Recycling Element, including Policies 7.1.1 through 7.2.5, promote compliance with State and federal waste management policies and encourage monitoring of waste services to increase waste diversion in the City. Development under the General Plan would also be required to comply with the applicable provisions of Title 5, Sanitation and Health, of the RBMC. Article 7 of the RBMC requires covered projects to submit a recycling report after the completion of a demolition project in addition to a waste management plan, and Article 8 requires single-family residences and commercial businesses to dispose of organic waste. With continued compliance with the applicable regulations, leading to increased recycling and waste diversion and adherence to the General Plan goals, objectives, policies, anticipated rates of solid waste disposal would be less than significant.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impacts relating to solid waste. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.17-59)

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**Impact 5.17-7: Development pursuant to the proposed project would not require or result in the relocation or construction of new or expanded electric power, natural gas, and telecommunications facilities the construction or relocation of which could cause significant environmental effects. [Threshold U-1]**

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### Electricity

Electrical service to the City is provided by SCE and CPA through connections to existing off-site electrical lines and new on-site infrastructure. As shown in Section 5.5, Table 5.5-3, *Year 2050 Forecast Electricity Consumption*, by horizon year 2050, electricity use in the City would increase by 230,624,940 kWh/year, or approximately 35 percent, from existing conditions. The total mid-electricity consumption in SCE's service area is forecast to increase by approximately 23,200 GWh between 2022 and 2035 (CEC 2024c). Therefore, the forecast increase in electricity demand for the plan area is well within the forecast demand in SCE's service area. Buildout of the General Plan would not require SCE to obtain additional electricity supplies, and impacts would be less than significant.

In addition, any development pursuant to the proposed GPU would be required to comply with energy efficiency standards set forth by Title 24 of the California Administrative Code, appliance efficiency regulations set forth by Title 20 of the California Administrative Code, and CALGreen. Furthermore, several policies in the existing Utilities Element would ensure that new development is served by electrical utilities and that the utilities comply with energy efficiency standards. For example, Policy 6.4.2 requires that the approval of new development in the City be contingent upon the ability of the project to be served with adequate electrical infrastructure and service. Policy 6.4.7 directs the City to work with SCE to develop and implement a menu of programs for public information/education and action to encourage electricity conservation practices. Therefore, project development would not require SCE to obtain new or expanded electricity supplies, and impacts would be less than significant.

### Natural Gas

As shown in Table 5.5-4, *Year 2050 Forecast Natural Gas Consumption*, in Section 5.5, existing natural gas use in the City totals 11,148,598 therms annually. By 2050, natural gas use in the City would increase by 2,623,262 therms annually, or approximately 24 percent, from existing conditions to a total of 13,771,860 therms per year. This increase is less than 0.01 percent of the total natural gas consumed in the SoCalGas service area in 2022 of 6,565 million therms. SoCalGas forecasts that it will have sufficient supplies to meet demands in its service area (CGEU 2018).

Therefore, the net increase in natural gas demand due to the buildout of the proposed project is within the amount that SoCalGas forecasts that it will supply to its customers, and buildout would not require SoCalGas to obtain increased natural gas supplies over its currently forecast supplies. Additionally, policies in the existing Utilities Element would ensure that new development is served by natural gas utilities. For example, Policy 6.5.1 directs the City to improve communication with SoCalGas to ensure the most efficient and safe operation and maintenance of the City's natural gas supply system and facilities. Policy 6.5.2 requires that the approval of new development in the City to be served by natural gas be contingent upon the ability of the project to be served with adequate natural gas infrastructure and service. Policy 6.5.3 requires that all new development to be served by natural gas install on-site pipeline connections to distribution facilities underground. Therefore, development pursuant to the proposed project would not require SoCalGas to obtain new or expanded natural gas supplies, and impacts would be less than significant. Therefore, impacts to electrical and natural gas utilities would be less than significant.

### Telecommunications

Infrastructure supporting telecommunications services associated with the General Plan Update would be provided and installed in compliance with all State and local regulations. Furthermore, a number of franchised telecommunications providers are available in the region, and no significant expansion or construction of the telecommunications network is anticipated as a result of implementation of the proposed project. Additionally, several policies in the existing General Plan Utilities Element would also ensure that telecommunications infrastructure is modernized and provided where needed and when new infrastructure is added, so it does not result in impacts to the environment. For example, Policy 6.6.1 directs the City to provide for the continued development, expansion, and modernization of telecommunications systems, and Policy 6.6.3 directs the City to pursue the expansion of coverage and availability of local cable television programming for government and community service meetings and events, public service notices and activities, and other nonprofit or community-serving programs that may be of interest or value to the community. Policy 6.6.6 directs the City to work with telecommunications providers to ensure that outdoor telephone facilities are located and designed so as to prevent adverse impacts on surrounding properties. As discussed, the General Plan Update would not require new or expanded telecommunication facilities, the construction or relocation of which could cause significant environmental effects, and impacts would be less than significant.

**Finding.** The proposed project would have less than significant direct, indirect, and cumulative impacts relating to electric power, natural gas, or telecommunication facilities. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. (Draft PEIR pg. 5.17-70).

## C. FINDINGS OF SIGNIFICANT ENVIRONMENTAL IMPACTS THAT CAN BE REDUCED TO A LESS THAN SIGNIFICANT LEVEL

The following summary describes impacts of the proposed project that, without mitigation, would result in significant adverse impacts. The City Council hereby finds that mitigation measures have been identified in the EIR and these Findings will avoid or substantially lessen the following potentially significant environmental impacts to a less than significant level. Upon implementation of the mitigation measures in the EIR, these impacts would be considered less than significant.

### 1. Cultural Resources

**Impact 5.4-2: Future development facilitated by the proposed project could impact or cause substantial adverse changes in the significance of known and/or unknown archaeological resources. [Threshold C-2]**

Archaeological sites are protected by a wide variety of state policies and regulations enumerated under the PRC. Cultural resources are also recognized as nonrenewable and therefore receive protection under the PRC and CEQA. Per Section 21083.2 of CEQA, the lead agency is required to determine whether a development project may have a significant effect on archaeological resources. If the lead agency determines that the project may have a significant effect on unique archaeological resources, the project-level CEQA document being prepared for the development project is required to address the issue of those resources.

The proposed project is a regulatory document that sets the framework for future growth and development in the City and does not directly result in development. Before any development or redevelopment activities would occur in the City, all such activities would be required to be analyzed for conformance with the General Plan, zoning requirements, and other applicable local, state, and federal requirements and obtain all necessary clearances and permits. Updates to the Zoning Ordinance and LCP would involve land-use changes that would be consistent with the General Plan Update. Therefore, adoption of the proposed project in itself would not lead to the disturbance of archaeological resources.

Although the proposed project includes policies that would minimize impacts to archaeological resources, such as OS 2.10, long-term implementation of the proposed project could allow development (e.g., infill development, redevelopment, and revitalization/restoration), including grading, of unknown sensitive areas. Grading and construction activities of undeveloped areas or redevelopment that requires more intensive soil excavation than in the past could potentially cause the disturbance of archaeological resources. Therefore, future development could potentially unearth previously unknown/unrecorded archaeological resources, and impacts could be potentially significant.

#### Mitigation Measures

The following mitigation measures were included in the Draft PEIR and the Final PEIR in an abundance of caution and are applicable to the proposed project. The measures as provided include any revisions incorporated in the Final PEIR.

CUL-2 **Cultural Resources Assessment.** For discretionary projects that involve ground-disturbing activities during construction on areas where no previous ground disturbance or excavation has occurred, or ground-disturbing activities would occur in native soil, a site-specific cultural resources study shall be completed prior to project approval. The study shall include records searches of the California Historical Resources Information System and the Sacred Lands File maintained by the Native American Heritage Commission. The records searches shall determine if the proposed project has been previously surveyed for archaeological resources, identify and characterize the results of previous cultural resource surveys, and disclose any cultural resources that have been recorded and/or evaluated. If the records search identifies a sensitivity for archaeological resources, an archaeological resources assessment shall be performed under the supervision of an archaeologist that meets the Secretary of the Interior's PQS in either prehistoric or historic archaeology. If the archaeological assessment indicates the area to be of medium sensitivity for archaeological resources, an archaeologist who meets the PQS shall be retained on an on-call basis.

If the archaeological assessment indicated the area to be highly sensitive for archaeological resources, a qualified archaeologist shall monitor all ground-disturbing construction and pre-construction activities.

CUL-3 **All Projects.** If cultural resources are discovered during ground-disturbing activities, all ground-disturbing activities within 50 feet of the find shall be halted until a meeting is convened between the developer, archaeologist, tribal representatives, and the Director of the Community Development Department, or their assigned designee. At the meeting, the significance of the discoveries shall be discussed and after consultation with the tribal representatives, developer, and archaeologist, a decision shall be made, with the concurrence of the Director of the Community Development Department, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the cultural resources.

### Finding

Changes or alterations have been required in, or incorporated into, the proposed project that avoid or substantially lessen the significant environmental effect as identified in the Draft PEIR. These changes are identified in the form of the mitigation measures above. The City of Redondo Beach hereby finds that implementation of the mitigation measures is feasible, and the measures are therefore adopted.

### Rationale for Finding

Policies incorporated into the proposed project and Mitigation Measure CUL-2 would require specific measures to identify, protect, and preserve cultural resources such as conducting site-specific archeological resources studies, monitoring earth-disturbing activities, and evaluating and recovering cultural resources found during construction activities. Mitigation Measures CUL-2 and CUL-3 would reduce potential impacts associated with archaeological resources to a level that is less than significant

by avoiding or recovering the archaeological resource(s). Therefore, no significant adverse impacts relating to archaeological resources have been identified. (Draft PEIR pg. 5.4-15)

### 2. Geology and Soils

**Impact 5.6-4: Development under the proposed project could directly or indirectly destroy a unique paleontological resource or unique geologic feature. [Threshold G-6]**

Paleontological resources are recognized as nonrenewable and therefore receive protection under the California Public Resources Code and CEQA. Adoption of the proposed project would not directly affect paleontological resources. Long-term implementation of the General Plan update land use plan could allow development, including grading, of known and unknown sensitive areas. Grading and construction activities in undeveloped areas or redevelopment that requires more intensive soil excavation than in the past could potentially disturb paleontological resources. Therefore, future development accommodated by the proposed project could potentially unearth previously unrecorded resources. Review and protection of paleontological resources are afforded by CEQA for individual development projects subject to discretionary actions that are implemented in accordance with the land use plan of the Proposed General Plan.

Research conducted by Cogstone using the Natural History Museum of Los Angeles County, the University of California Museum of Paleontology database, the PaleoBiology Database, and various print sources, indicate that paleontological sensitivity rankings (see Table 5.6-2) do not surpass level 3, indicating moderate sensitivity. Within the given sensitivities, records show palaeontologic resources are mainly found in Pleistocene deposits.

Long-term implementation of the proposed project could allow development, including grading, on portions of the City with sensitivity to paleontological resources. Therefore, future development could potentially unearth previously unknown/unrecorded paleontological resources. Mitigation Measures GEO-1 requires evaluating paleontological sensitivities prior to grading, and GEO-2 dictates the required process in the event of fossil discovery. Additionally, Policy OS-2.10 requires proper planning when dealing with the preservation and enhancement of unique and valuable community resources as part of the planning and development of various projects within the City.

#### Mitigation Measures

The following mitigation measures were included in the Draft PEIR and the Final PEIR in an abundance of caution and are applicable to the proposed project. The measures as provided include any revisions incorporated in the Final PEIR.

GEO-1 **Low to High Sensitivity.** Prior to issuance of a grading permit for discretionary projects that involve ground disturbance in previously undisturbed areas mapped with "low-to-high" paleontological sensitivity, the project applicant shall consult with a geologist or paleontologist to confirm whether the grading would occur at depths that could encounter highly sensitive sediments for paleontological resources. If confirmed that underlying sediments may have sensitivity, a qualified paleontologist shall be retained to develop and implement a Paleontological Resources Impact

Mitigation Plan. The paleontologist shall have the authority to halt construction during ground disturbing activities as outlined in Mitigation Measure GEO-2.

GEO-2 **All Projects.** In the event of any fossil discovery, regardless of depth or geologic formation, ground disturbing activities shall halt within a 50-foot radius of the find until its significance can be determined by a qualified paleontologist. Significant fossils shall be recovered, prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility in accordance with the standards of the Society of Vertebrate Paleontology. The most likely repository is the Natural History Museum of Los Angeles County. The repository shall be identified, and a curatorial arrangement shall be signed as part of the Paleontological Impact Mitigation Plan (GEO-1) and prior to collection of the fossils.

### Finding

Changes or alterations have been required in, or incorporated into, the proposed project that avoid or substantially lessen the significant environmental effect as identified in the Draft PEIR. These changes are identified in the form of the mitigation measures above. The City of Redondo Beach hereby finds that implementation of the mitigation measures is feasible, and the measures are therefore adopted.

### Rationale for Finding

Mitigation Measures GEO-1 and GEO-2 prescribe requirements for monitoring based on the sensitivity of sites for paleontological resources. Under GEO-1, areas that range from high to low sensitivity are required to prepare a Paleontological Resources Monitoring and Mitigation Plan. With adherence to mitigation measures GEO-1 and GEO-2, Impact 5.6-4 would be less than significant. (Draft PEIR pg. 5.6-27)

## 3. Noise

**Impact 5.11-2: Buildout of the proposed project may expose sensitive uses to excessive levels of groundborne vibration [N-2]**

### Construction Vibration

Construction vibration is a potential occurrence within Redondo Beach and will continue to be so regardless of whether the General Plan Update is adopted. Construction-related vibration near individual construction sites associated with development and activities under the proposed General Plan Update would not be substantially different from what they would be under the existing 1992 City of Redondo Beach General Plan.

Construction activities will occur in a variety of locations throughout Redondo Beach and will most likely require the use of off-road equipment known to generate some degree of vibration. Construction activities that generate excessive vibration, such as blasting, would not be expected to occur from future development due to the geography of Redondo Beach and the small number of properties with potential development, which reduces the likelihood of blasting during construction.

Receptors sensitive to vibration include structures (especially older masonry structures), people (especially residents, the elderly, and the sick), and equipment (e.g., magnetic resonance imaging equipment, high resolution lithographic, optical and electron microscopes). Regarding the potential effects of ground borne vibration to people, except for long-term occupational exposure, vibration levels rarely affect human health. The majority of construction equipment is not situated at any one location during construction activities but spread throughout a construction site and at various distances from sensitive receptors. Since specific future projects under the proposed General Plan Update are unknown at this time, it is conservatively assumed that the construction areas associated with these future projects could be within 50 feet of sensitive structures. The primary vibration-generating activities would occur during grading, placement of underground utilities, and construction of foundations. Table 5.11-11, *Representative Vibration Source Levels for Construction Equipment*, shows the typical vibration levels produced by construction equipment at 50 feet.

The City of Redondo Beach Municipal Code Section 4-24-503 of Article 5 states that all construction activity is prohibited, except between the hours of 7:00 a.m. and 6:00 p.m. on Monday, Tuesday, Wednesday, Thursday, and Friday and between the hours of 9:00 a.m. and 5:00 p.m. on Saturday. No construction activity is permitted on Sunday, or the days on which the holidays designated as Memorial Day, the Fourth of July, Labor Day, Thanksgiving Day, Christmas Day, and New Year's Day are observed. Furthermore, Section 4-24- 504 of Article 5 establishes requirements to protect the inhabitants of the City against ground borne vibration. Specifically, Section 4-24-504 states that the operation of any device which creates vibration which is above the vibration perception threshold of an individual at or beyond the property boundary of the source if on private property, or at 150 feet (46 meters) from the source if on a public space or public right of- way, is prohibited. For the purposes of this section, "vibration perception threshold" means the minimum ground or structure-borne vibrational motion necessary to cause a normal person to be aware of the vibration by such direct means as, but not limited to, sensation by touch or the visual observation of moving objects. Adherence to the City Municipal Code would ensure that vibration reduction is being provided to minimize temporary construction-related vibration impacts. However, as shown in the Table 5.11-11, vibration generated by construction equipment has the potential to be substantial, since it has the potential to exceed the FTA criteria for architectural damage (e.g., 0.12 inches per second [in/sec] PPV for fragile or historical resources, 0.2 in/sec PPV for nonengineered timber and masonry buildings, and 0.3 in/sec PPV for engineered concrete and masonry). Construction details and equipment for future project-level developments under the general plan buildout are not known at this time but may cause vibration impacts. Therefore, this would be a potentially significant impact.

### Operational Vibration Impacts

Industrial operations throughout the City would generate varying degrees of ground vibration, depending on the operational procedures and equipment. Such equipment-generated vibrations would spread through the ground and diminish with distance from the source. Because specific project-level information is not available at this time, it is not possible to quantify future vibration levels at vibration-sensitive receptors that may be near existing and future vibration sources. The proposed amendments to the Zoning Ordinance would facilitate the implementation of the General Plan updates related to land use and implement required Zoning Map changes and programs pursuant to the City's existing Certified Housing Element. The proposed project would also include amending portions of both the

Coastal Land Use Plan (LUP) and Implementation Plan (IP) components of its Local Coastal Program (LCP). Proposed changes to the LUP include updates to the Land Use Map consistent with the Land Use Map in the Focused General Plan Update. Therefore, with the potential for sensitive uses to be exposed to annoying and/or interfering levels of vibration from industrial operations, operations-related vibration impacts associated with implementation of the proposed project are considered potentially significant.

### Train Vibration

As discussed in Impact 5.11.4.2, the proposed project would not generate any new train trips through Redondo Beach. Vibration levels as a result of trains traveling along the existing railroad under the proposed General Plan Update would remain the same as existing conditions, unless otherwise changed by the respective rail authority. No impact would occur.

### Mitigation Measures

N-2 **Noise and Vibration Analysis**. Prior to issuance of a building permit for a project requiring pile driving during construction within 135 feet of fragile structures, such as historical resources, within 100 feet of nonengineered timber and masonry buildings (e.g., most residential buildings), or within 75 feet of engineered concrete and masonry (no plaster); or a vibratory roller within 25 feet of any structure, the project applicant shall prepare a noise and vibration analysis to assess and mitigate potential noise and vibration impacts related to these activities. This noise and vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer. The vibration levels shall not exceed Federal Transit Administration (FTA) architectural damage thresholds (e.g., 0.12 inches per second [in/sec] peak particle velocity [PPV] for fragile or historical resources, 0.2 in/sec PPV for nonengineered timber and masonry buildings, and 0.3 in/sec PPV for engineered concrete and masonry). If vibration levels would exceed these thresholds, alternative uses shall be used, such as drilling piles instead of pile driving and static rollers instead of vibratory rollers. If necessary, construction vibration monitoring shall be conducted to ensure vibration thresholds are not exceeded.

N-3 **Vibration Analysis**. Prior to discretionary approval by the City of Redondo Beach for development projects subject to review under the California Environmental Quality Act (CEQA) (i.e., nonexempt projects), that utilize equipment that has the potential to result in vibration (e.g., pile drivers, jack hammers, and vibratory rollers), a vibration analysis shall be conducted to assess and mitigate potential vibration impacts. This vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer and shall follow the latest CEQA guidelines, practices, and precedents.

### Finding

Changes or alterations have been required in, or incorporated into, the proposed project that avoid or substantially lessen the significant environmental effect as identified in the Draft PEIR. These changes

are identified in the form of the mitigation measures above. The City of Redondo Beach hereby finds that implementation of the mitigation measures is feasible, and the measures are therefore adopted.

### Rationale for Finding

Policies in the proposed project as well as Mitigation Measures N-2 and N-3 would reduce potential impacts associated with noise to a level that is less than significant. Therefore, no significant unavoidable adverse impacts relating to noise have been identified. (Draft PEIR pg. 5.11-45)

## 4. Tribal Cultural Resources

**Impact 5.16-1: The proposed project would cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources as defined in Public Resources Code section 5020.1(k). [Threshold TCR-1]**

The proposed project is a regulatory document that sets the framework for future growth and development in the City and does not directly result in development. Updates to the Zoning Ordinance and LCP would involve land-use changes that would be consistent with the General Plan Update. Before any development or redevelopment activities would occur in the City, all such activities would be required to be analyzed for conformance with the General Plan, zoning requirements, and other applicable local, state, and federal requirements and obtain all necessary clearances and permits. Therefore, adoption of the proposed project in itself would not lead to the disturbance of TCRs.

Although the proposed project includes policies that would minimize impacts to TCRs, such as OS-2.10, long-term implementation of the proposed project could allow development (e.g., infill development, redevelopment, and revitalization/restoration), including grading, of unknown sensitive areas. Grading and construction activities of undeveloped areas or redevelopment that requires more intensive soil excavation than in the past could potentially cause the disturbance of TCRs. Therefore, future development could potentially unearth previously unknown/unrecorded TCRS resources, and impacts could be potentially significant.

### Mitigation Measure

The following mitigation measures were included in the Draft PEIR and the Final PEIR in an abundance of caution and are applicable to the proposed project. The measures as provided include any revisions incorporated in the Final PEIR.

CUL-2 **Cultural Resources Assessment**. For discretionary projects that involve ground-disturbing activities during construction on areas where no previous ground disturbance or excavation has occurred, or ground-disturbing activities would occur in native soil, a site-specific cultural resources study shall be completed prior to project approval. The study shall include records searches of the California Historical Resources Information System and the Sacred Lands File maintained by the Native American Heritage Commission. The records searches shall determine if the proposed project has been previously surveyed for archaeological resources, identify

and characterize the results of previous cultural resource surveys, and disclose any cultural resources that have been recorded and/or evaluated.

If the records search identifies a sensitivity for archaeological resources, an archaeological resources assessment shall be performed under the supervision of an archaeologist that meets the Secretary of the Interior's PQS in either prehistoric or historic archaeology. If the archaeological assessment indicates the area to be of medium sensitivity for archaeological resources, an archaeologist who meets the PQS shall be retained on an on-call basis.

If the archaeological assessment indicated the area to be highly sensitive for archaeological resources, a qualified archaeologist shall monitor all ground-disturbing construction and pre-construction activities.

CUL-3 **All Projects.** If cultural resources are discovered during ground-disturbing activities, all ground-disturbing activities within 50 feet of the find shall be halted until a meeting is convened between the developer, archaeologist, tribal representatives, and the Director of the Community Development Department, or their assigned designee. At the meeting, the significance of the discoveries shall be discussed and after consultation with the tribal representatives, developer, and archaeologist, a decision shall be made, with the concurrence of the Director of the Community Development Department, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the cultural resources.

### Finding

Changes or alterations have been required in, or incorporated into, the proposed project that avoid or substantially lessen the significant environmental effect as identified in the Draft PEIR. These changes are identified in the form of the mitigation measures above. The City of Redondo Beach hereby finds that implementation of the mitigation measures is feasible, and the measures are therefore adopted.

### Rationale for Finding

Policies in the proposed project as well as Mitigation Measures CUL-2 and CUL-3 would reduce potential impacts associated with tribal cultural resources to a level that is less than significant. Therefore, no significant unavoidable adverse impacts relating to tribal cultural resources have been identified. (Draft PEIR pg. 5.16-8)

## D. SIGNIFICANT AND UNAVOIDABLE IMPACTS THAT CANNOT BE MITIGATED TO BELOW THE LEVEL OF SIGNIFICANCE

The following summary describes the unavoidable adverse impact of the proposed project where either mitigation measures were found to be infeasible, or the mitigation measures are under the control of another agency. The following impacts would remain significant and unavoidable.

### 1. Air Quality

**Impact 5.2-1: Buildout of the proposed project and associated emissions would exceed the assumptions of the South Coast AQMD's AQMP. [Threshold AQ-1]**

The South Coast AQMD is directly responsible for reducing emissions from area, stationary, and mobile sources in the SoCAB to achieve the National and California AAQS and has responded to this requirement by preparing an AQMP. The South Coast AQMD Governing Board adopted the 2022 AQMP, which is a regional and multiagency effort (South Coast AQMD, CARB, SCAG, and EPA).

A consistency determination with the AQMP plays an important role in local agency project review by linking local planning and individual projects to the AQMP. It fulfills the CEQA goal of informing decision makers of the environmental efforts of the project under consideration early enough to ensure that air quality concerns are fully addressed. It also provides the local agency with ongoing information as to whether they are contributing to the clean air goals in the AQMP.

The two principal criteria for conformance with an AQMP are:

1. Whether the project would exceed the assumptions in the AQMP.

2. Whether the project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timeline attainment of air quality standards.

SCAG is South Coast AQMD's partner in the preparation of the AQMP, providing the latest economic and demographic forecasts and developing transportation measures. Regional population, housing, and employment projects developed by SCAG are based, in part, on general plan land use designations. These projections form the foundation for the emissions inventory of the AQMP.

#### Criterion 1

Table 5.2-10, *Comparison of Population and Employment Forecast*, compares the population and employment growth forecast under the General Plan Update to the existing conditions. The table shows that the General Plan Update would result in more VMT because of an increase in population and employment. This leads to an increase in VMT per service population compared to the existing and current General Plan conditions. As a result, the General Plan Update would provide a less efficient land use that would increase VMT per resident and employee. Additionally, as shown in Table 5.2-10, the General Plan Update would also result in an increase in VMT per service population compared to the current General Plan. It is presumed that the land use designations of the current General Plan either directly or indirectly contributed to any SCAG projections used in the latest AQMP emissions inventory.

Updates to the Zoning Ordinance would reflect new land use designations and densities specified by the Focused General Plan Update. Updates to the LCP would include revisions to the Coastal Land Use Plan and Implementation Plan. These modifications would not involve land-use changes that would cause a greater increase in population and employment growth than what is considered under the Focused General Plan Update. Since the Focused General Plan Update would lead to an increase in VMT per service population compared to existing conditions and the current General Plan, implementation of the proposed project would not be consistent with the AQMP under the first criterion.

### Criterion 2

The SoCAB is designated nonattainment for $O_3$ and $PM_{2.5}$ under the California and National AAQS, nonattainment for $PM_{10}$ under the California AAQS, and nonattainment for lead (Los Angeles County only) under the National AAQS (CARB 2024a). Because the General Plan Update involves long-term growth associated with buildout of the City, cumulative emissions generated from operation of individual development projects would exceed the South Coast AQMD regional and localized thresholds (see Impact 5.2-3). Consequently, emissions generated by development projects in addition to existing sources in the City are considered to cumulatively contribute to the nonattainment designations of the SoCAB. Buildout of the proposed land use plan associated with the General Plan Update could contribute to an increase in frequency or severity of air quality violations and delay attainment of the AAQS or interim emission reductions in the AQMP, and emissions generated from buildout would result in a significant air quality impact.

Updates to the Zoning Ordinance and LCP would not involve land-use changes that would cause a greater increase in frequency or severity of air quality violations and delay attainment of the AAQS or interim emission reductions in the AQMP. However, as identified in Impact 5.2-3, the General Plan Update would result in a substantial increase in VOC, $NO_X$, and CO compared to existing conditions. Therefore, implementation of the proposed project would not be consistent with the AQMP under the second criterion.

### Summary

New growth would be focused in areas of the City where services exist and in proximity to existing major transit centers, which may contribute to reducing VMT per service population. However, as shown in Table 5.2-10, buildout of the proposed project would increase VMT per service population and would not be consistent with the AQMP under the first criterion. In addition, air pollutant emissions associated with buildout of the proposed project would cumulatively contribute to the nonattainment designations in the SoCAB. Therefore, the proposed project would be inconsistent with the AQMP.

### Mitigation Measures

The following mitigation measures were included in the Draft PEIR and the Final PEIR in an abundance of caution and are applicable to the proposed project. The measures as provided include any revisions incorporated in the Final PEIR.

AQ-1 Prior to discretionary approval by the City of Redondo Beach for development projects subject to CEQA (California Environmental Quality Act) review (i.e., nonexempt projects), project applicants shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts to the City of Redondo Beach Planning Division for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (South Coast AQMD) methodology for assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the South Coast AQMD–adopted thresholds of significance, the City of Redondo Beach Building & Safety Division shall require feasible mitigation measures to reduce air quality emissions. Potential measures shall be incorporated as conditions of approval for a project and may include, but are not limited to the following:

- Require fugitive dust control measures that exceed South Coast Air Quality Management District's Rule 403, such as:
  - Requiring use of nontoxic soil stabilizers to reduce wind erosion.
  - Applying water every four hours to active soil disturbing activities.
  - Tarping and/or maintaining a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.
- Using construction equipment rated by the United States Environmental Protection Agency as having Tier 4 interim or higher exhaust emission limits.
- Ensuring construction equipment is properly serviced and maintained to the manufacturer's standards.
- Limiting nonessential idling of construction equipment to no more than five consecutive minutes.
- Using Super-Compliant VOC paints for coating of architectural surfaces whenever possible. A list of Super-Compliant architectural coating manufactures can be found on the South Coast Air Quality Management District's website at: https://www.aqmd.gov/home/rules-compliance/compliance/vocs/architectural-coatings/super-compliant-coatings.

These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City's Planning Division.

AQ 2 Prior to discretionary approval by the City of Redondo Beach for development projects subject to CEQA (California Environmental Quality Act) review (i.e., nonexempt projects), project applicants shall prepare and submit a technical assessment evaluating potential project operation-phase-related air quality impacts to the City of Redondo Beach Planning Division for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (South Coast AQMD) methodology in assessing air quality impacts. If operation-related air pollutants are determined to have the potential to exceed the South Coast AQMD–adopted thresholds of significance, the City of

Redondo Beach Planning Division shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during operational activities. The identified measures shall be included as part of the conditions of approval. Possible mitigation measures to reduce long-term emissions could include, but are not limited to the following:

- For site-specific development that requires refrigerated vehicles, the construction documents shall demonstrate an adequate number of electrical service connections at loading docks for plug-in of the anticipated number of refrigerated trailers to reduce idling time and emissions.
- Applicants for manufacturing and light industrial uses shall consider energy storage and combined heat and power in appropriate applications to optimize renewable energy generation systems and avoid peak energy use.
- Site-specific developments with truck delivery and loading areas and truck parking spaces shall include signage as a reminder to limit idling of vehicles while parked for loading/unloading in accordance with California Air Resources Board Rule 2845 (13 CCR Chapter 10 § 2485).
- Provide changing/shower facilities as specified in the Nonresidential Voluntary Measures of CALGreen.
- Provide bicycle parking facilities per the Nonresidential Voluntary Measures and Residential Voluntary Measures of CALGreen.
- Provide facilities to support electric charging stations per the Nonresidential Voluntary Measures and Residential Voluntary Measures of CALGreen.
- Applicant-provided appliances shall be Energy Star–certified appliances or appliances of equivalent energy efficiency (e.g., dishwashers, refrigerators, clothes washers, and dryers). Installation of Energy Star–certified or equivalent appliances shall be verified by the City during plan check.

### Finding

Changes or alterations have been required in, or incorporated into, the proposed project that avoid or substantially lessen the significant environmental effect as identified in the Draft PEIR. These changes are identified in the form of the mitigation measures above. The City of Redondo Beach hereby finds that implementation of the mitigation measures is feasible, and the measures are therefore adopted.

The City finds that there are no other mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code Section 21081(a)(1), (3); Guidelines Section 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the City has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits,

including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

### Rationale for Finding

Incorporation of Mitigation Measures AQ-1 and AQ-2 into future development projects would reduce operation-phase criteria air pollutant emissions associated with buildout of the proposed project. Additionally, goals and policies in the General Plan would promote increased capacity for alternate transportation modes. Nevertheless, Impact 5.2-1 would remain **significant and unavoidable**. (Draft PEIR pg. 5.2-46)

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**Impact 5.2-2: Construction activities associated with future development that would be accommodated under the proposed project could generate short-term emissions in exceedance of the South Coast AQMD's threshold criteria. [Threshold AQ-2 and AQ-3]**

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Construction activities under the General Plan Update would also temporarily increase $PM_{10}$, $PM_{2.5}$, VOC, $NO_X$, $SO_X$, and CO regional emissions in the SoCAB. The primary source of $NO_X$, CO, and $SO_X$ emissions is the operation of construction equipment. The primary sources of particulate matter ($PM_{10}$ and $PM_{2.5}$) emissions are activities that disturb the soil, such as grading and excavation, road construction, and building demolition and construction. The primary sources of VOC emissions are the application of architectural coating and off-gas emissions associated with asphalt paving. A discussion of health impacts associated with air pollutant emissions generated by construction activities is included under "Air Pollutants of Concern" in Section 5.2.1, Environmental Setting.

Construction activities associated with the General Plan Update would occur over the buildout horizon of the plan, causing short-term emissions of criteria air pollutants. However, information regarding specific development projects, soil types, and the locations of receptors would be needed in order to quantify the level of impact associated with construction activity. Due to the scale of development activity associated with buildout of the General Plan Update, the projects cumulative emissions would likely exceed the South Coast AQMD regional significance thresholds. In accordance with the South Coast AQMD methodology, emissions that exceed the regional significance thresholds would cumulatively contribute to the nonattainment designations of the SoCAB.

Air quality emissions related to construction must be addressed on a project-by-project basis. For the General Plan Update, which is a broad-based policy plan, it is not possible to determine whether the scale and phasing of individual projects would exceed the South Coast AQMD's short-term regional or localized construction emissions thresholds. In addition to regulatory measures—e.g., South Coast AQMD Rule 403 for fugitive dust control, Rule 1113 for architectural coatings, and CARB's Airborne Toxic Control Measures—mitigation imposed at the project level may include extension of construction schedules and/or use of special equipment.

While individual projects under the General Plan Update may not exceed the South Coast AQMD regional significance thresholds, the likely scale and extent of the combined construction activities associated with the future development project under the General Plan Update would likely exceed the relevant South Coast AQMD thresholds. Updates to the Zoning Ordinance and LCP would not

involve land-use changes that would result in the generation of construction-related criteria air pollutant emissions greater than the General Plan Update. Overall, construction-related regional air quality impacts of developments that would be accommodated by the proposed project would be potentially significant.

### Mitigation Measures

The following mitigation measure was included in the Draft PEIR and the Final PEIR in an abundance of caution and is applicable to the proposed project. The measure as provided includes any revisions incorporated in the Final PEIR.

AQ-1 Prior to discretionary approval by the City of Redondo Beach for development projects subject to CEQA (California Environmental Quality Act) review (i.e., nonexempt projects), project applicants shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts to the City of Redondo Beach Planning Division for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (South Coast AQMD) methodology for assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the South Coast AQMD–adopted thresholds of significance, the City of Redondo Beach Building & Safety Division shall require feasible mitigation measures to reduce air quality emissions. Potential measures shall be incorporated as conditions of approval for a project and may include, but are not limited to the following:

- Require fugitive dust control measures that exceed South Coast Air Quality Management District's Rule 403, such as:
  - Requiring use of nontoxic soil stabilizers to reduce wind erosion.
  - Applying water every four hours to active soil disturbing activities.
  - Tarping and/or maintaining a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.
- Using construction equipment rated by the United States Environmental Protection Agency as having Tier 4 interim or higher exhaust emission limits.
- Ensuring construction equipment is properly serviced and maintained to the manufacturer's standards.
- Limiting nonessential idling of construction equipment to no more than five consecutive minutes.
- Using Super-Compliant VOC paints for coating of architectural surfaces whenever possible. A list of Super-Compliant architectural coating manufactures can be found on the South Coast Air Quality Management District's website at: https://www.aqmd.gov/home/rules-compliance/compliance/vocs/architectural-coatings/super-compliant-coatings.

These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City's Planning Division.

### Finding

Changes or alterations have been required in, or incorporated into, the proposed project that avoid or substantially lessen the significant environmental effect as identified in the Draft PEIR. These changes are identified in the form of the mitigation measure above. The City of Redondo Beach hereby finds that implementation of the mitigation measure is feasible, and the measure is therefore adopted.

The City finds that there are no other mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code Section 21081(a)(1), (3); Guidelines Section 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the City has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

### Rationale for Finding

Buildout in accordance with the proposed project would generate short-term emissions that would exceed South Coast AQMD's regional significance thresholds and cumulatively contribute to the nonattainment designations of the SCCAB. Mitigation Measure AQ-1 and the goals and policies of the Redondo Beach General Plan would reduce construction-related air pollutant emissions to the extent feasible. However, individual projects accommodated under the proposed project might exceed the South Coast AQMD's regional significance thresholds. Therefore, construction-related regional air quality impacts of developments that would be accommodated by the proposed project would remain **significant and unavoidable**. (Draft PEIR pg. 5.2-47)

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**Impact 5.2-3: Implementation of the proposed project would generate additional, long-term emissions in exceedance of South Coast AQMD's threshold criteria and cumulatively contribute to the South Coast Air Basin's nonattainment designations. [Threshold AQ-2]**

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The General Plan Update guides growth and development in the City by designating allowed land uses by parcel and through implementation of its goals and policies. New development would increase air pollutant emissions in the City and contribute to the overall emissions in the SoCAB. A discussion of health impacts associated with air pollutant emissions generated by operational activities is included under "Air Pollutants of Concern" in Section 5.2.1, Environmental Setting. The General Plan Update sets up the framework for growth and development, but does not directly result in development. Before development can occur, it must be analyzed for conformance with the general plan, zoning requirements, and other applicable local and State requirements; comply with the requirements of CEQA; and obtain all necessary clearances and permits.

### Criteria Air Pollutant Emissions Forecast

The emissions forecast for Redondo Beach is shown in Table 5.2-11, City of Redondo Beach Regional Criteria Air Pollutant Emissions Forecast. As shown in the table, buildout of the General Plan Update would continue to result in an increase in long-term emissions that exceed the daily South Coast AQMD thresholds for VOC, $NO_X$, and CO. Emissions of $SO_2$, $PM_{10}$, and $PM_{2.5}$ would slightly increase compared to the existing land uses in the City in 2050, but would not exceed the South Coast AQMD thresholds.

The increase in VOC emissions compared to the existing land uses is a result of the increase in residential uses, which results in an increase in consumer product use in the City. Emissions of VOC that exceed the South Coast AQMD regional significance thresholds would contribute to the $O_3$ nonattainment designation of the SoCAB. The increase in $NO_X$ and CO emissions is a result of the increase in mobile source and off-road equipment emissions within the City and are precursors to the formation of $O_3$. In addition, $NO_X$ is a precursor to the formation of particulate matter ($PM_{10}$ and $PM_{2.5}$). Therefore, emissions of $NO_X$ that exceed South Coast AQMD's regional significance thresholds would cumulatively contribute to the $O_3$ and particulate matter ($PM_{10}$ and $PM_{2.5}$) nonattainment designations of the SoCAB.

Furthermore, the General Plan Update includes policies that would contribute to reducing operational emissions associated with development projects. Policies S-10.1, S-10.4, and S-10.6 would reduce GHG emissions and energy demand to provide air quality co-benefits. Policies LU-3.7, LU-3.10, LU-4.6, and LU 6.22 would help reduce VMT and vehicle congestion to further improve air quality. Despite the policies in the General Plan Update, the General Plan Update would exceed the South Coast AQMD regional significance thresholds and would significantly contribute to the nonattainment designation of the SoCAB. Updates to the Zoning Ordinance and LCP would not involve major land-use changes that would cause a greater increase in criteria air pollutant emissions than what is considered under the Focused General Plan Update. However, since the Focused General Plan Update would exceed the South Coast AQMD regional significance thresholds, implementation of the proposed project would significantly contribute to the nonattainment designations of the SoCAB and result in a potentially significant impact.

### Mitigation Measures

The following mitigation measure was included in the Draft PEIR and the Final PEIR in an abundance of caution and is applicable to the proposed project. The measure as provided includes any revisions incorporated in the Final PEIR.

AQ 2 Prior to discretionary approval by the City of Redondo Beach for development projects subject to CEQA (California Environmental Quality Act) review (i.e., nonexempt projects), project applicants shall prepare and submit a technical assessment evaluating potential project operation-phase-related air quality impacts to the City of Redondo Beach Planning Division for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (South Coast AQMD) methodology in assessing air quality impacts. If operation-related air pollutants are determined to have the potential to

exceed the South Coast AQMD–adopted thresholds of significance, the City of Redondo Beach Planning Division shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during operational activities. The identified measures shall be included as part of the conditions of approval. Possible mitigation measures to reduce long-term emissions could include, but are not limited to the following:

- For site-specific development that requires refrigerated vehicles, the construction documents shall demonstrate an adequate number of electrical service connections at loading docks for plug-in of the anticipated number of refrigerated trailers to reduce idling time and emissions.
- Applicants for manufacturing and light industrial uses shall consider energy storage and combined heat and power in appropriate applications to optimize renewable energy generation systems and avoid peak energy use.
- Site-specific developments with truck delivery and loading areas and truck parking spaces shall include signage as a reminder to limit idling of vehicles while parked for loading/unloading in accordance with California Air Resources Board Rule 2845 (13 CCR Chapter 10 § 2485).
- Provide changing/shower facilities as specified in the Nonresidential Voluntary Measures of CALGreen.
- Provide bicycle parking facilities per the Nonresidential Voluntary Measures and Residential Voluntary Measures of CALGreen.
- Provide facilities to support electric charging stations per the Nonresidential Voluntary Measures and Residential Voluntary Measures of CALGreen. Applicant-provided appliances shall be Energy Star–certified appliances or appliances of equivalent energy efficiency (e.g., dishwashers, refrigerators, clothes washers, and dryers). Installation of Energy Star–certified or equivalent appliances shall be verified by the City during plan check.

**Finding**

Changes or alterations have been required in, or incorporated into, the proposed project that avoid or substantially lessen the significant environmental effect as identified in the Draft PEIR. These changes are identified in the form of the mitigation measure above. The City of Redondo Beach hereby finds that implementation of the mitigation measure is feasible, and the measure is therefore adopted.

The City finds that there are no other mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code Section 21081(a)(1), (3); Guidelines Section 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the City has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits,

including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

### Rationale for Finding

Buildout in accordance with the proposed project would generate long-term emissions that would exceed South Coast AQMD's regional significance thresholds and cumulatively contribute to the nonattainment designations of the SCCAB. Mitigation Measure AQ-2, in addition to the goals and policies of the proposed project, would reduce air pollutant emissions to the extent feasible. The measures and policies covering topics such as expansion of the pedestrian and bicycle networks, promotion of public and active transit, and support to increase building energy efficiency and energy conservation would also reduce criteria air pollutants in the city. However, Impact 5.2-3 would remain **significant and unavoidable** due to the increase in VOCs associated with the proposed project from consumer product use by residential development. (Draft PEIR pg. 5.2-49)

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**Impact 5.2-4: The proposed project could expose sensitive receptors to substantial criteria air pollutant and toxic air contaminant concentrations. [Threshold AQ-3]**

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Development and operation of new land uses accommodated under the proposed land use plan could generate new sources of localized criteria air pollutant and TACs in the City from area/stationary sources and mobile sources.

### CO Hotspots

Areas of vehicle congestion have the potential to create pockets of CO called hotspots. In 2007, the SoCAB was designated in attainment for CO under both the California AAQS and National AAQS. The CO hotspot analysis conducted for the attainment by South Coast AQMD did not predict a violation of CO standards at the busiest intersections in Los Angeles during the peak morning and afternoon periods. As identified in South Coast AQMD's 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan), peak carbon monoxide concentrations in the SoCAB in previous years, prior to redesignation, were a result of unusual meteorological and topographical conditions and not of congestion at a particular intersection (South Coast AQMD 1992; South Coast AQMD 2003).

Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection to more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal air does not mix—in order to generate a significant CO impact (BAAQMD 2023). Implementation of the General Plan Update under horizon year conditions would not result in hourly traffic increases of this magnitude. According to traffic volume data provided by Fehr & Peers, the intersection that would experience the greatest traffic volumes in the forecast year would be Artesia Boulevard east of Rindge Lane, with an estimated 31,800 average daily trips (ADT). The peak hour trips at this intersection would be even fewer than the estimated average daily trips. As an industry standard, the ADT are divided by 10 to identify the estimated peak hour traffic volumes at this intersection. Based on adjusting the ADT to identify the peak hour volumes, the intersection at Artesia Boulevard east of Rindge Lane would experience an estimated 3,180 peak hour vehicle trips. Thus, implementation of the General Plan Update would not produce the volume of traffic required to

generate a CO hotspot. Updates to the Zoning Ordinance and LCP would not involve major land-use changes that would produce a greater CO hotspot impact compared to buildout of the Focused General Plan Update. As such, the proposed project would result in a less than significant CO hotspots impact.

### Localized Significance Thresholds

Implementation of the General Plan Update could expose sensitive receptors to elevated pollutant concentrations during construction activities if it would cause or contribute significantly to elevating those levels. Unlike mass of emissions shown in Table 5.2-11, described in pounds per day, localized concentrations refer to an amount of pollutant in a volume of air (ppm or μg/m3) and can be correlated to potential health effects. LSTs are the amount of project-related emissions at which localized concentrations (ppm or μg/m3) would exceed the ambient air quality standards for criteria air pollutants for which the SoCAB is designated a nonattainment area.

#### *Construction LSTs*

Buildout of the General Plan Update would occur over the buildout horizon of the plan via several smaller projects, each with its own construction time frame and equipment. Because an LST analysis can only be conducted at a project-level, quantification of LSTs is not applicable for the program-level environmental analysis of the General Plan Update. Because potential development and redevelopment could occur close to existing sensitive receptors, future development projects that would be accommodated by the General Plan Update have the potential to expose sensitive receptors to substantial pollutant concentrations. Updates to the Zoning Ordinance and LCP would not involve major land-use changes that would expose sensitive receptors to substantial pollutant concentrations greater than what is considered under buildout of the Focused General Plan Update. Construction equipment exhaust combined with fugitive particulate matter emissions has the potential to expose sensitive receptors to substantial concentrations of criteria air pollutant emissions and result in potentially significant impacts.

#### *Operation LSTs*

The types of land uses that could generate substantial amounts of stationary source emissions include industrial land uses, which is an accommodated land use under the General Plan Update (see Table 3-1, Existing Land Use Summary, and Table 3-4, Summary of Existing and Proposed Land Uses). Implementation of the General Plan Update policies could contribute to reducing criteria air pollutant emissions to nearby sensitive receptors. Policies LU-5.7, and OS-8.4 would encourage expansion of urban forests and buffer distances to reduce air quality impacts in the City. Policy LU-3.4 and LU-5.5 would ensure proposed industrial and other non-residential development would be compatible with surrounding land uses to reduce environmental effects on sensitive receptors. Policy LU-5.1 would ensure new development would be compatible with existing development to minimize the impacts of future development on air quality in the City. The aforementioned policies of the General Plan Update would contribute to minimizing localized operation-related emissions from individual land use development projects accommodated in the General Plan Update to the extent possible.

However, per the LST methodology, information regarding specific development projects and the locations of receptors would be needed in order to quantify the levels of localized operation and

construction-related impacts associated with future development projects. Thus, because the General Plan Update is a broad-based policy plan and does not itself propose specific development projects, it is not possible to calculate individual project-related operation emissions at this time. Updates to the Zoning Ordinance and LCP would not involve major land-use changes that would generate greater localized operation impacts than what is considered under the Focused General Plan Update.

Overall, because of the likely scale of future development and the inclusion of industrial uses that would be accommodated by the General Plan Update, some development projects could likely exceed the LSTs. Therefore, localized operation-related air quality impacts associated with implementation of the proposed project are considered potentially significant impacts.

### Health Risk: Toxic Air Contaminants

The allowed development under the General Plan Update could elevate concentrations of TACs (i.e., DPM) in the vicinity of sensitive land uses during temporary construction activities that would use off-road equipment operating on-site, and at different levels depending on the type of activity (for example, limited to none during installation of utilities, and more during grading activities). Operation of the development allowed under the General Plan Update would also generate DPM emissions from diesel truck activity (truck maneuvering and idling), TRUs, and diesel-fueled off-road equipment (i.e., forklifts and yard trucks) in proximity to nearby sensitive receptors.

#### *Permitted Stationary Sources*

Various industrial and commercial processes (e.g., manufacturing, dry cleaning) allowed under the proposed land use plan would be expected to release TACs. Industrial land uses, such as chemical processing facilities, chrome-plating facilities, dry cleaners, and gasoline-dispensing facilities, have the potential to be substantial stationary sources that would require a permit from South Coast AQMD. As mentioned before, Policy LU 3.4, LU-5.1, and LU-5.5 would ensure development to be compatible with surrounding land uses to reduce environmental effects on sensitive receptors. Updates to the Zoning Ordinance and LCP would not involve industrial land-use changes (greater than what is considered under the Focused General Plan Update) that would have the potential to release TACs, therefore no impacts would occur. Moreover, emissions of TACs would be controlled by South Coast AQMD through permitting and would be subject to further study and health risk assessment prior to the issuance of any necessary air quality permits under South Coast AQMD Rule 1401, which would ensure less than significant impacts.

#### *Industrial Land Uses*

Warehousing or industrial operations generate substantial DPM emissions from off-road equipment use, truck idling, and/or use of transport refrigeration units for cold storage. The General Plan Update could result in a net increase of 3,859,102 square feet of industrial land use in Industrial I-1, Industrial I-3, and Industrial Flex zones (refer to Figure 3-6). Though stationary sources associated with the General Plan Update would be required to comply with South Coast AQMD Rule 1401, truck idling does not fall under the purview of the air district. However, Policy LU-3.4 calls for mitigating potential air quality impacts associated with industrial and other nonresidential land uses. Policy LU-5.5 would require new industrial and sensitive land uses to implement buffer distances as recommended by CARB. Overall, these policies would contribute to minimizing health risk impacts to the surrounding

sensitive receptors. However, until specific future development projects are proposed, the associated emissions and concentrations cannot be determined or modeled. Thus, health risk impacts from development of industrial land uses associated with the General Plan Update are considered potentially significant. Updates to the Zoning Ordinance and LCP would not involve industrial land-use changes greater than what is considered under the Focused General Plan Update therefore no additional impacts would occur.

### Environmental Justice (EJ)

South Coast AQMD is taking steps to address localized impacts and exposures in EJ communities, which are disproportionally impacted by various types of pollution and experience health, social, and economic inequalities. These inequities can also make residents of EJ communities more vulnerable to the effects of environmental pollution. These communities are often located near multiple air pollution sources, including mobile sources and commercial and industrial facilities (South Coast AQMD 2022). The most critical air pollutant affecting health in the SoCAB is PM2.5, which includes DPM. Although there are no identified EJ communities in the City, Policies LU-3.2, LU-3.4, LU-5.1, and LU-5.5 in the Land Use Element would ensure development to be compatible with surrounding land uses to reduce environmental effects on sensitive receptors.

### Mitigation Measures

The following mitigation measures were included in the Draft PEIR and the Final PEIR; and in an abundance of caution, is applicable to the proposed project. The measures as provided includes any revisions incorporated in the Final PEIR.

AQ-1 Prior to discretionary approval by the City of Redondo Beach for development projects subject to CEQA (California Environmental Quality Act) review (i.e., nonexempt projects), project applicants shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts to the City of Redondo Beach Planning Division for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (South Coast AQMD) methodology for assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the South Coast AQMD–adopted thresholds of significance, the City of Redondo Beach Building & Safety Division shall require feasible mitigation measures to reduce air quality emissions. Potential measures shall be incorporated as conditions of approval for a project and may include, but are not limited to the following:

- Require fugitive dust control measures that exceed South Coast Air Quality Management District's Rule 403, such as:
  - Requiring use of nontoxic soil stabilizers to reduce wind erosion.
  - Applying water every four hours to active soil disturbing activities.
  - Tarping and/or maintaining a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.
- Using construction equipment rated by the United States Environmental Protection Agency as having Tier 4 interim or higher exhaust emission limits.

- Ensuring construction equipment is properly serviced and maintained to the manufacturer's standards.
- Limiting nonessential idling of construction equipment to no more than five consecutive minutes.
- Using Super-Compliant VOC paints for coating of architectural surfaces whenever possible. A list of Super-Compliant architectural coating manufactures can be found on the South Coast Air Quality Management District's website at: https://www.aqmd.gov/home/rules-compliance/compliance/vocs/architectural-coatings/super-compliant-coatings.

These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City's Planning Division.

AQ 2 Prior to discretionary approval by the City of Redondo Beach for development projects subject to CEQA (California Environmental Quality Act) review (i.e., nonexempt projects), project applicants shall prepare and submit a technical assessment evaluating potential project operation-phase-related air quality impacts to the City of Redondo Beach Planning Division for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (South Coast AQMD) methodology in assessing air quality impacts. If operation-related air pollutants are determined to have the potential to exceed the South Coast AQMD–adopted thresholds of significance, the City of Redondo Beach Planning Division shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during operational activities. The identified measures shall be included as part of the conditions of approval. Possible mitigation measures to reduce long-term emissions could include, but are not limited to the following:

- For site-specific development that requires refrigerated vehicles, the construction documents shall demonstrate an adequate number of electrical service connections at loading docks for plug-in of the anticipated number of refrigerated trailers to reduce idling time and emissions.
- Applicants for manufacturing and light industrial uses shall consider energy storage and combined heat and power in appropriate applications to optimize renewable energy generation systems and avoid peak energy use.
- Site-specific developments with truck delivery and loading areas and truck parking spaces shall include signage as a reminder to limit idling of vehicles while parked for loading/unloading in accordance with California Air Resources Board Rule 2845 (13 CCR Chapter 10 § 2485).
- Provide changing/shower facilities as specified in the Nonresidential Voluntary Measures of CALGreen.
- Provide bicycle parking facilities per the Nonresidential Voluntary Measures and Residential Voluntary Measures of CALGreen.

- Provide facilities to support electric charging stations per the Nonresidential Voluntary Measures and Residential Voluntary Measures of CALGreen. Applicant-provided appliances shall be Energy Star–certified appliances or appliances of equivalent energy efficiency (e.g., dishwashers, refrigerators, clothes washers, and dryers). Installation of Energy Star–certified or equivalent appliances shall be verified by the City during plan check.

AQ-3 **Industrial and Warehouse Development Health Risk Assessments.** Prior to discretionary approval by the City of Redondo Beach, project applicants for new industrial or warehousing development projects that 1) have the potential to generate 100 or more diesel truck trips per day or have 40 or more trucks with operating diesel-powered transport refrigeration units, and 2) are within 1,000 feet of a sensitive land use (e.g., residential, schools, hospitals, nursing homes), as measured from the property line of the project to the property line of the nearest sensitive use, shall submit a health risk assessment (HRA) to the City of Redondo Beach Planning Division for review and approval. The HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment and the South Coast AQMD. If the HRA shows that the incremental cancer risk and/or noncancer hazard index exceeds the respective threshold, as established by the South Coast AQMD at the time a project is considered, the project applicant will be required to identify best available control technologies for toxics (T BACTs) and appropriate enforcement mechanisms and demonstrate that they are capable of reducing potential cancer and noncancer risks to an acceptable level. T-BACTs may include but are not limited to restricting idling on-site or electrifying warehousing docks to reduce diesel particulate matter, or requiring use of newer equipment and/or vehicles. T-BACTs identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site plan.

### Finding

Changes or alterations have been required in, or incorporated into, the proposed project that avoid or substantially lessen the significant environmental effect as identified in the Draft PEIR. These changes are identified in the form of the mitigation measures above. The City of Redondo Beach hereby finds that implementation of the mitigation measure is feasible, and the measure is therefore adopted.

The City finds that there are no other mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code Section 21081(a)(1), (3); Guidelines Section 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the City has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits,

including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

### Rationale for Finding

Buildout of the proposed project could expose sensitive receptors to substantial concentrations of toxic air contaminants. Buildout could result in new sources of criteria air pollutant emissions and/or TACs near existing or planned sensitive receptors. Review of development projects by South Coast AQMD for permitted sources of air toxics (e.g., industrial facilities, dry cleaners, and gasoline dispensing facilities) would ensure that health risks are minimized. Additionally, Mitigation Measure AQ-3 would ensure mobile sources of TACs not covered under South Coast AQMD permits are considered during subsequent project-level environmental review by the City of Redondo Beach. Individual development projects would be required to achieve the incremental risk thresholds established by South Coast AQMD, and TACs would be less than significant.

However, implementation of the proposed project would generate TACs that could contribute to elevated levels in the air basin. While individual projects would achieve the project-level risk threshold of 10 per million, they would nonetheless contribute to the higher levels of risk in the City as a whole. Therefore, the proposed project's cumulative contribution to health risk is **significant and unavoidable**. (Draft PEIR pg. 5.2-52)

## 2. Cultural Resources

**Impact 5.4-1: Future development facilitated by the proposed project could impact or cause substantial adverse change in the significance of an identified or potentially eligible historic resource. [Threshold C-1]**

The proposed project is a regulatory document that sets the framework for future growth and development in the City and does not directly result in development. Updates to the Zoning Ordinance and LCP would involve land-use changes that would be consistent with the General Plan Update. Before any development or redevelopment activities would occur in the City, all such activities would be required to be analyzed for conformance with the General Plan, zoning requirements, and other applicable local, state, and federal requirements and obtain all necessary clearances and permits. Therefore, adoption of the proposed project in itself would not lead to demolition or material alteration of any historic resource.

The proposed project includes policies that would minimize impacts to historic resources, such as LU-7.1, LU-7.2, LU-4.3, LU-4.4, and OS-2.10. However, identified historic structures and sites that are potentially eligible for future historic resources listing may be vulnerable to development activities accompanying infill, redevelopment, or revitalization that would be accommodated by the proposed project. For instance, the placement of new buildings adjacent to a historic resource may result in indirect impacts to access, visibility, and visual context, and renovations or modifications to historic resources may deteriorate or destroy the characteristics that make those resources important or unique. In addition, other buildings or structures that could meet the NRHP criteria upon reaching 50 years of age might be impacted by development or redevelopment activity that would be accommodated by the proposed project. Although Title 10, Chapter 4, Historic Resources Preservation, of the Redondo

Beach Municipal Code provides regulations to protect cultural and historical resources within the City limits, impacts to historic resources are considered potentially significant.

### Mitigation Measures

The following mitigation measures were included in the Draft PEIR and the Final PEIR in an abundance of caution and are applicable to the proposed project. The measures as provided include any revisions incorporated in the Final PEIR.

CUL-1 **Historical Resources Assessment.** For discretionary projects that involve construction activities that may adversely impact potentially eligible historical resources (i.e., structures 45 years or older), a historical resources assessment shall be performed by an architectural historian or a historian who meets the Secretary of the Interior's Professionally Qualified Standards (PQS) in architectural history or history. The assessment shall include a records search to determine if any resources that may be potentially affected by the project have been previously recorded, evaluated, and/or designated in the National Register of Historic Places, California Register of Historic Resources (CRHR), or local register of historic resources. Following the records search, the qualified historian or architectural historian shall conduct a reconnaissance-level and/or intensive-level survey in accordance with the California Office of Historic Preservation guidelines to identify any previously unrecorded potential historical resources that may be potentially affected by the proposed project. Pursuant to the definition of a historical resource under CEQA, potential historical resources shall be evaluated under a developed historic context. The assessment shall provide the historic context, methods, results, and recommendations for appropriate findings. The assessment shall be provided to the Director of the Community Development Department for concurrence as to the appropriate mitigation for historic resources.

### Finding

Changes or alterations have been required in, or incorporated into, the proposed project that avoid or substantially lessen the significant environmental effect as identified in the Draft PEIR. These changes are identified in the form of the mitigation measure above. The City of Redondo Beach hereby finds that implementation of the mitigation measure is feasible, and the measures are therefore adopted.

The City finds that there are no other mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code Section 21081(a)(1), (3); Guidelines Section 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the City has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

### Rationale for Finding

Policies in the proposed project as well as Mitigation Measure CUL-1 would reduce potential impacts associated with historic resources. However, if a proposed project would result in the demolition or significant alteration of a historical resource, it cannot be mitigated to a less than significant level. As a result, impacts on historic resources as a result of future development in accordance with the proposed project are **significant and unavoidable**. (Draft PEIR pg. 5.4-15)

## 3. Energy

**Impact 5.5-2: The proposed project would conflict with or obstruct a state or local plan for renewable energy or energy efficiency. [Threshold E-2]**

### California Renewables Portfolio Standard Program

The state's electricity grid is transitioning to renewable energy under California's RPS Program. Renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. As stated, the RPS goals have been updated since adoption of SB 1078 in 2002. In general, California has RPS requirements of 33 percent renewable energy by 2020 (SB X1-2), 40 percent by 2024 (SB 350), 50 percent by 2026 (SB 100), 60 percent by 2030 (SB 100), and 100 percent by 2045 (SB 100). SB 100 also establishes RPS requirements for publicly owned utilities that consist of 44 percent renewable energy by 2024, 52 percent by 2027, and 60 percent by 2030. The statewide RPS requirements do not directly apply to individual development projects, but to utilities and energy providers such as SCE and CPA, whose compliance with RPS requirements would contribute to the State of California objective of transitioning to renewable energy. The land uses accommodated under the proposed project would comply with the current and future iterations of the Building Energy Efficiency Standards and CALGreen.

Furthermore, as discussed for Impact 5.5-1, the General Plan Update includes Policies LU-5.3, S-2.6, and S-10.1, which would support the statewide goal of transitioning the electricity grid to renewable sources. Policy S-10.4 would promote energy efficient city-owned facilities, including battery storage systems. Therefore, implementation of the proposed project would not conflict with or obstruct implementation of California's RPS program, and no impact would occur.

### City of Redondo Beach Climate Action Plan

As mentioned previously, the City's CAP serves as a guide for action by setting GHG emission reduction goals consistent with the State's AB 32 GHG emission reduction targets and establishing strategies and policies to achieve desired outcomes over the next 20 years (Redondo Beach 2017). A consistency analysis with the applicable City's CAP goals is shown in Table 5.5-7, Consistency Analysis with the City of Redondo Beach Climate Action Plan.

The General Plan Update includes goals and policies that would contribute toward minimizing inefficient, wasteful, or unnecessary transportation energy consumption, increasing building energy efficiency, and ensure compliance with State, regional, or local plans for renewable energy. Moreover, the land uses accommodated under the General Plan Update would be required to comply with the current and future iterations of the Building Energy Efficiency Standards and CALGreen.

However, as identified in Table 5.5-7, while the General Plan Update would be consistent with many of the strategies in the City's CAP, the General Plan Update would not be consistent with Goal LUT: G – Land Use Strategies and several SCAG'S RTP/SCS goals (see Section 5.10, Land Use and Planning, Table 5.10-1, SCAG 2024 RTP/SCS Goal Consistency Analysis). Therefore, implementation of the General Plan Update could conflict with or obstruct implementation of the City's CAP, and impacts would be potentially significant.

### Mitigation Measures

There are no feasible mitigation measures for this impact.

### Finding

The City finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code Section 21081(a)(1), (3); Guidelines Section 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the City has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

### Rationale for Finding

There are no feasible mitigation measures that could fully mitigate the proposed project's population growth and VMT levels to less than significant and fully reduce the proposed project's inconsistencies with the goals of SCAG's 2024-2050 RTP/SCS. Implementation of the General Plan Update would result in beneficial energy impacts by contributing to reducing VMT, increasing energy and water use efficiency, and increasing renewable energy improvements. However, because the proposed project is a regulatory document that sets the framework for future growth and development in the City and does not directly result in development, and thus VMT, use of VMT reduction strategies would need to be assessed on a project-by-project basis. Therefore, the proposed project would continue to be inconsistent with the land use strategies of the City's CAP as it pertains to reducing VMT. Project and cumulative impacts would remain **significant and unavoidable.** (Draft PEIR pg. 5.5-31)

## 4. Greenhouse Gas Emissions

**Impact 5.7-1: Implementation of the proposed project would not result in a substantial increase in emissions but would not place the City on a trajectory to achieve the goals established under Executive Order S-03-05 or progress toward the State's carbon neutrality goal. [Threshold GHG-1]**

Development under the proposed project would contribute to global climate change through direct and indirect emissions of GHG from land uses in the City. A general plan does not directly result in development without subsequent approvals of development projects. Updates to the Zoning

Ordinance would reflect new land use designations and densities specified by the Focused General Plan Update. Updates to the LCP would include revisions to the Coastal Land Use Plan (LUP) and Implementation Plan (IP) consistent with the Land Use Map in the Focused General Plan Update. These modifications would not involve land-use changes that would cause a substantially greater impact in GHG emissions compared to what is evaluated from buildout of the Focused General Plan Update.

### Horizon Year 2050 Emissions Forecast

Buildout of the General Plan Update is not linked to a specific development time frame but is assumed over a 25-year horizon. Implementation of the General Plan Update by the horizon year of 2050 would result in a net increase of 8,667 residents and 7,989 employees in the City. Development that would be accommodated by the General Plan Update would generate a net increase of 266,380 daily VMT at buildout. The community GHG emissions inventory for the General Plan Update at buildout compared to existing conditions is in Table 5.7-5 of the PEIR*, City of Redondo Beach GHG Emissions Forecast*.

As shown in Table 5.7-5, buildout of the land uses accommodated under the General Plan Update would result in a net decrease of GHG emissions from existing conditions. In addition, GHG emissions per service population (SP) would decrease. The primary reason for the decrease in overall community-wide GHG emissions, despite an increase in population and employment in the City, is due to regulations adopted to reduce GHG emissions and turnover of California's on-road vehicle fleets.

### Consistency with the State's GHG Reduction Targets and Carbon Neutrality Goals

To determine whether the proposed project would result in a potentially significant impact, the proposed project must demonstrate consistency with the State's 2045 GHG reduction target of carbon neutrality. Under the General Plan Update, new growth would be focused on areas of the City where services exist or can be expanded and/or extended to serve additional and more intensive development and in proximity to existing and proposed major transit centers. However, even with the planned intensification of existing development and transit-oriented development, as identified in Table 5.7-5, the General Plan Update would result in a substantial increase in GHG emissions and would not achieve an 85 percent reduction in GHG emissions by 2045.

Reduction strategies to meet the long-term 2050 GHG reduction goal in addition to establishment of a 2050 reduction target would be required to be included in the planned future updates to the Climate Action Plan. Additionally, state strategies to achieve post-2030 targets would be necessary. Therefore, until such time, GHG emissions impacts for the General Plan Update are considered potentially significant in regard to meeting the long-term year 2050 reduction goal.

### General Plan Update Policies That May Reduce GHG Emissions

As identified in Table 5.7-5, the majority of emissions are from on-road transportation (40 percent) and building electricity (28 percent). While growth in the City would cumulatively contribute to GHG emissions impacts, implementation of the General Plan Update policies could also help minimize energy and mobile-source emissions. Policies S-10.1, S-10.4, and S-10.6 would contribute to reducing

emissions from energy consumption by increasing energy efficiency and renewable energy improvements in households, businesses, and City-owned facilities. Policies LU-2.8, LU-3.7, LU3.8, LU-4.6, and OS-1.8 contribute to reducing GHG emissions from mobile sources by promoting pedestrian access and public transportation, reducing vehicle congestion, and supporting TDM measures where feasible.

### Summary

It is anticipated that the proposed project would reduce energy sector emissions by increasing energy efficiency, energy conservation, and use of renewable energy. Implementation of these energy-related policies would contribute to minimizing GHG emissions associated with the City to the extent feasible. However, as described and shown in Table 5.7-5, GHG emissions reduction are only 1 percent less than the CEQA baseline and not the 85 percent necessary to ensure the City is on a trajectory to achieve the long-term reductions goals AB 1279 and substantial progress toward the State's carbon neutrality goals. Therefore, GHG emissions associated with the proposed project are considered potentially significant.

### Mitigation Measures

GHG-1 The City of Redondo Beach shall prepare an update Climate Action Plan (CAP) to achieve the greenhouse gas (GHG) reduction targets of Senate Bill (SB) 32 for the year 2030 and chart a trajectory to achieve the long-term GHG reduction goal set by Assembly Bill (AB) 1279. The updated CAP shall be completed within three years of certification of the General Plan EIR. The updated CAP shall be updated every five years to ensure the City is monitoring the plan's progress toward achieving the City's GHG reduction target and to require amendment if the plan is not achieving a specified level. The update shall consider a trajectory consistent with the GHG emissions reduction goal established under SB 32 for year 2030, AB 1279 for year 2045, and the latest applicable statewide legislative GHG emission reduction that may be in effect at the time of the CAP update.

The CAP update shall include the following:

- GHG inventories of existing and forecast year GHG levels.
- Tools and strategies for reducing GHG emissions to achieve the GHG reduction goals of Senate Bill 32 for year 2030.
- Tools and strategies for reducing GHG emissions to ensure a trajectory with the long-term GHG reduction goal and carbon neutrality goal for year 2045 of AB 1279.
- Plan implementation guidance that includes, at minimum, the following components consistent with the proposed updated CAP:
  - Administration and Staffing

- Finance and Budgeting
- Timelines for Measure Implementation
- Community Outreach and Education
- Monitoring, Reporting, and Adaptive Management
- Tracking Tools.

### Finding

Changes or alterations have been required in, or incorporated into, the proposed project that avoid or substantially lessen the significant environmental effect as identified in the Draft PEIR. These changes are identified in the form of the mitigation measures above. The City of Redondo Beach hereby finds that implementation of the mitigation measures is feasible, and the measures are therefore adopted.

### Rationale for Finding

Policies in the proposed project as well as Mitigation Measure GHG-1 would reduce potential impacts associated with GHG. However, it is possible that as a result of the proposed project the GHG emissions will not ensure carbon neutrality. As a result, impacts on GHG as a result of future development in accordance with the proposed project are **significant and unavoidable**. (Draft PEIR pg. 5.7-32)

## 5. Noise

**Impact 5.11-1: Construction activities associated with buildout of the proposed project would result in temporary noise increases at sensitive receptors. The proposed project would not result in the generation of substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. [Threshold N-1]**

The Noise Element of the proposed General Plan Update provides policy direction for minimizing noise impacts on the community and establishes noise control measures for construction and operation of land use projects. By identifying noise-sensitive land uses and establishing compatibility guidelines for those land uses, noise considerations would influence the general distribution, location, and intensity of future land uses. The result is that effective land use planning and project design can alleviate the majority of noise problems.

### Temporary Construction Noise

Under the proposed General Plan Update, the primary source of temporary noise within the City would be demolition and construction activities associated with development projects and activities. Construction activities would involve both off-road demolition/construction equipment (excavators, dozers, cranes, etc.), general demolition/construction equipment (compressors, jack hammers, saws), and transport of workers and equipment to and from construction sites. Table 5.11-8, Reference Construction Equipment Noise Levels (50 Feet from Source), shows typical noise levels produced by the types of demolition/construction equipment and off-road equipment that would likely be used

during future construction within Redondo Beach. It is noted that future development under the General Plan Update could potentially require installation of pile foundations that utilize impact pile drivers or similar equipment that generates high noise levels.

Construction noise is currently a substantial source of temporary noise within Redondo Beach and will continue to be so regardless of whether the General Plan Update is adopted. Noise levels near individual construction sites associated with development and activities under the proposed General Plan Update would not be substantially different from what they would be under the existing 1992 City of Redondo Beach General Plan. Since specific future projects within the City are unknown at this time, it is conservatively assumed that the construction areas associated with these future projects could be within 50 feet of sensitive land uses. As depicted in Table 5.11-8, noise levels generated by individual pieces of construction equipment typically range from approximately 74 dBA to 101.3 dBA Lmax at 50 feet and 67.7 dBA to 94.3 dBA Leq at 50 feet. Average hourly noise levels associated with construction projects can vary, depending on the activities performed. Short-term increases in vehicle traffic, including worker commute trips and haul truck trips, may also result in temporary increases in ambient noise levels at nearby receptors. During each stage of construction, a different mix of equipment would operate, and noise levels would vary based on the amount of equipment on-site and the location of the activity. Construction noise levels drop off at a rate of about 6 dBA per doubling of distance between the noise source and the receptor. Intervening structures or terrain would result in lower noise levels at distant receivers.

The City of Redondo Beach Municipal Code, Article 5, Section 4-24-503, states that all construction activity is prohibited, except between the hours of 7:00 a.m. and 6:00 p.m. on Monday, Tuesday, Wednesday, Thursday, and Friday and between the hours of 9:00 a.m. and 5:00 p.m. on Saturday. No construction activity is permitted on Sunday or the days on which the holidays designated as Memorial Day, the Fourth of July, Labor Day, Thanksgiving Day, Christmas Day, and New Year's Day are observed. It is common for cities to regulate construction noise in this manner because construction noise is temporary, short term, and intermittent in nature, and ceases upon completion of construction. Additionally, Noise Element Policy N-1.10 of the proposed General Plan addresses construction noise by minimizing the impacts of construction noise on adjacent uses through the enforcement of mitigation requirements established in the City's Noise Ordinance, such as legal hours of operation, advance noticing of construction operations, incorporating physical barriers as necessary, and using tools and equipment properly outfitted with sound-dampeners. Implementation would be as follows:

- Implementation Measure N-20: Construction Noise. Continue to implement best practices in controlling construction noise including designated work hours, noise dampening equipment, noise barriers, and public noticing. The City's Municipal Code Section 4-24-503 of Article 5 ensures that noise limitations are imposed to minimize temporary noise impacts associated with construction by restricting it to the daytime hours when many people are away from their residences. Through implementation of proposed General Plan Policy N-1.10, the City would require construction noise limits, including through limiting construction hours, consistent with the City Municipal Code. Lastly, Implementation Measure N 20 requires best practices be implemented at construction sites to control construction noise.

The City's Municipal Code Section 4-24-503 of Article 5 ensures that noise limitations are imposed to minimize temporary noise impacts associated with construction by restricting it to daytime hours. Through implementation of proposed General Plan Policy N- 1.10, the City would require construction noise limits, including through limiting construction hours, consistent with the City Municipal Code. Lastly, Implementation Measure N-20 requires best practices be implemented at construction sites to control construction noise. However, because construction activities associated with any individual development may occur near noise-sensitive receptors and because, depending on the project type, equipment list, time of day, phasing and overall construction durations, noise disturbances may occur for prolonged periods of time or during the more sensitive nighttime hours, construction noise impacts associated with implementation of the proposed project are considered potentially significant.

### Stationary Source Noise

The development of residential, automotive, industrial, or other uses and activities under the proposed General Plan Update could generate substantial stationary noise. Such sources could generate noise from heating, ventilation, and air conditioning (HVAC) mechanical equipment, back-up diesel generators in some cases, parking lot activity, backup beepers from internal truck and equipment maneuvering, and other sources. Table 5.11-9, Stationary Source Noise Levels, identifies noise levels generally associated with common stationary noise sources.

Stationary source noise is currently a substantial source of noise within Redondo Beach and will continue to be so regardless of whether the proposed General Plan Update is adopted. Noise levels near individual sources under the proposed General Plan Update would not be substantially different from what they would be under the existing 1992 City of Redondo Beach General Plan. The Noise Element of the proposed General Plan addresses stationary noise with Policies N-1.1, N-1.4, N-1.5, and N-1.6 and the following implementation measures:

- Implementation Measure N-1: Noise Evaluation. Continue to evaluate the noise impacts of new projects during the development review process; begin evaluation of the impacts cumulative noise conditions may have on proposed noise-sensitive uses, including residential, during the development review process; consider requirements for noise analysis conducted by an acoustical specialist for projects involving land uses where operations are likely to impact adjacent noise sensitive land uses.

- Implementation Measure N-3: Mitigate Existing Impacts. Identify existing business operations that produce exterior noise above the maximum levels specified in the City's General Plan or noise ordinance for adjacent land uses. Reach out to those businesses to provide educational resources about best practices for noise prevention and mitigation. Assist businesses to implement mitigation strategies through permit assistance, expedited permitting, and other incentives. If the noise impact cannot be mitigated, provide site selection assistance to help businesses relocate to other areas of the City.

- Implementation Measure N-4: Best practice. Conduct a study of best practices for the prevention and mitigation of noise impacts on sensitive land uses caused by existing or new business operations.

- Implementation Measure N-7. Site Design and Technology. Require designs of parking structures, terminals, and loading docks for noise-generating land uses that minimize the potential noise impacts of vehicles on-site and on adjacent land uses. Encourage and/or require feasible technological options to reduce noise to acceptable levels.

Policy N-1.1 would require the integration of noise considerations into land use planning decisions to minimize new noise impacts, including noise impacts from stationary sources, from new development and new uses. Implementation Measure N-1 and Policies N-1.4 and N-1.5 would require an acoustical analysis for all new projects and consideration of identified noise-reducing measures. Implementation Measure N-3 would seek to identify existing business operations that produce exterior noise above the maximum levels specified in Table N-01 of the proposed General Plan and then to assist these businesses to implement noise-reduction mitigation strategies through permit assistance, expedited permitting, and other incentives. Implementation Measure N-4 would instigate an analysis of best practices for the prevention and mitigation of noise impacts on sensitive land uses caused by existing or new business operations while Policy N-1.6 requires the mitigation of identified noise impacts of business operations that are persistent, periodic, or impulsive on surrounding neighborhoods and nearby sensitive receptors. Similarly, Implementation Measure N-7 would require designs of parking structures, terminals, and loading docks for noise-generating land uses that minimize the potential noise impacts of vehicles on-site and on adjacent land uses. With implementation of the proposed General Plan policies and Implementation Measures identified above, future development and activities under the proposed General Plan Update would result in a less than significant impact related to stationary noise sources.

### Rail Noise

Freight and Metrolink trains are a mobile noise source at the eastern edge of the City. The single railway corridor affecting the City enters Redondo Beach just north of the Hawthorne Boulevard/W 190th Street intersection and generally traverses north-south, skirting residences and El Nido Park before crossing 182nd Street. The corridor continues north-south past the Pacific Crest Cemetery, Target shopping center, and residences before crossing Artesia Boulevard and exiting the City. This rail corridor reenters the City at Inglewood Avenue, traversing an industrial-commercial area before once again exiting the City at Marine Avenue. The Metrolink railway currently ends west of the I-405 near the intersection of Marine Avenue and Redondo Beach Avenue.

Noise levels along the existing railroad under the proposed General Plan Update would remain the same as existing conditions; any changes to the frequency of trains or to train equipment would be initiated and implemented by the respective rail authority rather than the City of Redondo Beach, and they are not part of the proposed General Plan Update.

No aspect of the proposed General Plan Update would increase railway noise levels along the existing railroad corridor. Adherence to the proposed General Plan policy provisions identified above would ensure that the noise environment in Redondo Beach does not increase in a manner that worsens existing noise compatibility or exposes noise-sensitive land uses to "unacceptable" noise levels. Therefore, this impact is less than significant.

### Traffic Noise

Future development and activities under the proposed General Plan Update are expected to affect the community noise environment mainly by generating additional traffic. Transportation-source noise levels were calculated using the FHWA Highway Noise Prediction Model (FHWA-RD-77-108) with traffic counts provided by Fehr & Peers (2024). The model calculates the average noise level at specific locations based on traffic volumes, average speeds, roadway geometry, and site environmental conditions. The average vehicle noise rates (energy rates) used in the FHWA model have been modified to reflect average vehicle noise rates identified for California by Caltrans. The Caltrans data shows that California automobile noise is 0.8 to 1.0 dBA higher than national levels and that medium and heavy truck noise is 0.3 to 3.0 dBA lower than national levels. Future traffic noise contours are mapped on Figure 5.11-3, Future Traffic Noise Contours. Table 5.11-10, Future Roadway Noise Levels, shows the calculated off-site roadway noise levels under existing traffic levels compared to future buildout under the proposed General Plan Update.

As previously described in Section 5.11.1.1, a 5 dBA change is required before any noticeable change in community response is expected. Based on this fact, a significant increase in traffic noise is considered to be an increase in the existing ambient noise environment of at least 5 dBA Ldn. As reflected in Table 5.11-10, this analysis included a large sample of local roadways segments but did not include all roadways within Redondo Beach. The analyzed segments were selected to illustrate potential changes in roadway noise throughout Redondo Beach. Therefore, additional roadways segments in Redondo Beach may experience increased traffic noise.

As shown in Table 5.11-10, no City roadway segment would experience an increase of more than 5.0 dBA Ldn over existing conditions with buildout anticipated under the proposed General Plan Update. It is noted that despite projected increases in regional population in the Redondo Beach area, automobile traffic and thus traffic noise, is projected to decrease slightly over time on several roadways within Redondo Beach. The traffic modeling includes both the citywide and regional changes in housing units, employment and regional transportation projects that would occur over the life of the General Plan Update (Fehr & Peers, 2024). Changes in both citywide and regional land use patterns and transportation networks, such as the increased development of mixed-use areas or changing concentrations of job opportunities from certain locations to others, particularly those accessible to existing and planned public transit can result in a shift in traffic patterns thereby decreasing traffic on certain roadways.

The Noise Element of the proposed General Plan addresses traffic noise with Policies N-1.1, N-1.7, and N 1.11 and implementation measures N-1, N-15, N-16, N-17, N-21, and N-22.

The proposed amendments to the Zoning Ordinance would facilitate the implementation of the General Plan updates related to land use and implement required Zoning Map changes and programs pursuant to the City's existing Certified Housing Element. The proposed project would also include amending portions of both the Coastal Land Use Plan (LUP) and Implementation Plan (IP) components of its Local Coastal Program (LCP). Proposed changes to the LUP include updates to the Land Use Map consistent with the Land Use Map in the Focused General Plan Update. With implementation of the proposed General Plan policies and implementation measures identified above,

future development and activities under the proposed project would result in a less than significant impact related to traffic noise sources.

### Mitigation Measures

N-1 Construction Noise Measures. Construction contractors shall implement the following measures for construction activities conducted in the City of Redondo Beach. Construction plans submitted to the City shall identify these measures on demolition, grading, and construction plans. The City of Redondo Beach Planning and Building Divisions shall verify that grading, demolition, and/or construction plans submitted to the City include these notations prior to issuance of demolition, grading, and/or building permits.

- During the entire active construction period, equipment and trucks used for project construction shall use the best-available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds), wherever feasible.
- Impact tools (e.g., jack hammers and hoe rams) shall be hydraulically or electrically powered wherever possible. Where the use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used along with external noise jackets on the tools.
- Stationary equipment, such as generators and air compressors, shall be located as far as feasible from nearby noise-sensitive uses.
- Stockpiling shall be located as far as feasible from nearby noise-sensitive receptors.
- Construction traffic shall be limited, to the extent feasible, to approved haul routes established by the City Planning, Engineering, and Building Divisions.
- At least 10 days prior to the start of construction activities, a sign shall be posted at the entrance(s) to the job site, clearly visible to the public, that includes permitted construction days and hours, as well as the telephone numbers of the City's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint. If the authorized contractor's representative receives a complaint, he/she shall investigate, take appropriate corrective action, and report the action to the City.
- Signs shall be posted at the job site entrance(s), within the on-site construction zones, and along queueing lanes (if any) to reinforce the prohibition of unnecessary engine idling. All other equipment shall be turned off if not in use for more than 5 minutes.
- During the entire active construction period and to the extent feasible, the use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for

safety warning purposes only. The construction manager shall use smart back-up alarms, which automatically adjust the alarm level based on the background noise level or switch off back-up alarms and replace with human spotters in compliance with all safety requirements and laws.

- If construction is anticipated for prolonged periods, as required by the Community Development Director or their assigned designee, erect temporary noise barriers (at least as high as the exhaust of equipment and breaking line-of-sight between noise sources and sensitive receptors), as necessary and feasible, to maintain construction noise levels at or below the performance standard of 80 dBA Leq. Barriers shall be constructed with a solid material that has a density of at least 4 pounds per square foot with no gaps from the ground to the top of the barrier.

### Finding

Changes or alterations have been required in, or incorporated into, the proposed project that avoid or substantially lessen the significant environmental effect as identified in the Draft PEIR. These changes are identified in the form of the mitigation measure above. The City of Redondo Beach hereby finds that implementation of the mitigation measures is feasible, and the measures are therefore adopted.

### Rationale for Finding

Implementation of Mitigation Measure N-1 would reduce potential noise impacts during construction to the extent feasible through implementation of construction best management practices. However, due to the potential for proximity of construction activities to sensitive uses, the number of construction projects occurring simultaneously, and the potential duration of construction activities, Impact 5.11-1 could result in a temporary substantial increase in noise levels above ambient conditions. Therefore, impacts would remain **significant and unavoidable**. (Draft PEIR pg. 5.11-43)

## 6. Land use and Planning

**Impact 5.10-2: Project Implementation would conflict with applicable plans adopted for the purpose of avoiding or mitigating an environmental effect. [Threshold LU-2]**

### SCAG Connect SoCal Consistency

The proposed project would include climate benefits, land use patterns, and goals and polices that align with the RTP/SCS. Implementation of the proposed project would support a variety of land use types including high-density housing and mixed-use development that encourages better connectivity to employment and commercial uses, and in closer proximity to public transit. However, as discussed below in Table 5.10-2, *SCAG Connect SoCal Consistency Analysis*, the proposed General Plan Update would not be consistent with several of the goals of SCAG's 2024-2050 RTP/SCS at buildout. As discussed in Section 5.2, *Air Quality,* Section 5.8, *Greenhouse Gas Emissions*, and Section 5.15, *Transportation,* impacts associated with air quality, GHG and VMT would be significant. Therefore, the proposed project would conflict with SCAG's Connect SoCal goals aimed at improving air quality and reducing GHG emissions and impacts would be considered significant.

**Table 5.10-2 SCAG Connect SoCal Consistency Analysis**

| Connect SoCal Goals | Project Consistency Analysis |
|---|---|
| **Mobility: Build and maintain an integrated multimodal transportation network.** | |
| Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions. | **Inconsistent.** Although the proposed project would include climate benefits, land use patterns, and goals and polices that align with the RTP/SCS, as discussed in Section 5.2, *Air Quality,* Section 5.8, *Greenhouse Gas Emissions*, and Section 5.15, *Transportation,* impacts associated with air quality, GHG and VMT would be significant and therefore, the proposed project would not be consistent with this goal. |
| Ensure that reliable, accessible, affordable and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities. | **Consistent.** See Section 5.15, *Transportation,* of this DEIR, which discusses transportation, mobility, and circulation and how the proposed project, including the proposed policies, would align with RTP/SCS goals and policies. |
| Support planning for people of all ages, abilities and backgrounds. | **Consistent.** The proposed project includes many policies throughout the General Plan Elements to support the health of its residents and ensure equitable access to resources, including Policy LU-3.1 through LU-4.6, which encourage compatibility between land uses to promote healthy lifestyles, active transportation, access to transit, new open space and parkland opportunities, and bicycle and pedestrian connectivity to recreational amenities. See also section 5.15, *Transportation,* of this DEIR, which discusses transportation, mobility, and circulation and how the proposed project, including the proposed policies, would align with RTP/SCS goals and policies. |
| **Communities: Develop, connect and sustain livable and thriving communities.** | |
| Create human-centered communities in urban, suburban and rural settings to increase mobility options and reduce travel distances. | **Consistent.** See section 5.15, *Transportation,* of this DEIR, which discusses transportation, mobility, and circulation and how the proposed project, including the proposed policies, would align with RTP/SCS goals and policies. |
| Produce and preserve diverse housing types in an effort to improve affordability, accessibility and opportunities for all households. | **Consistent.** The proposed project supports a variety of housing types, including High Density Residential, Residential Overlays, and mixed-use development to encourage better connectivity to employment and commercial uses. Policies LU-1.1 through LU 1.10 encourage a balanced land use pattern, a diversity of housing types, jobs-housing balance, and transit-oriented development. Therefore, the proposed project would be consistent with this policy. |
| **Environment: Create a healthy region for the people of today and tomorrow.** | |
| Develop communities that are resilient and can mitigate, adapt to and respond to chronic and acute stresses and disruptions, such as climate change. | **Inconsistent.** Although the proposed project would include climate benefits, land use patterns, and goals and polices that align with the RTP/SCS, as discussed in Section 5.2, *Air Quality* and Section 5.8, *Greenhouse Gas Emissions*, impacts associated with VMT, air quality and GHG, would be significant and therefore, the proposed project would not be consistent with this goal. |
| Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emission and enable more sustainable use of energy and water. | **Inconsistent.** See section 5.15, *Transportation,* of this DEIR, which discusses transportation, mobility, and circulation and how the proposed project, including the proposed policies, would align with RTP/SCS goals and policies. Although the proposed project would include climate benefits, land use patterns, and goals and polices that align with the RTP/SCS, as discussed in Section 5.2, *Air Quality* and Section 5.8, *Greenhouse Gas Emissions*, impacts associated with VMT, air quality and GHG, would be significant and therefore, the proposed project would not be consistent with this goal. |
| Conserve the region's resources. | **Consistent.** The proposed project contains several policies in the Land Use and Open Space & Conservation Elements that would preserve and enhance areas that may provide habitat for special-status species (LU-5.7, OS-2.10, OS-8.1, OS-8.2, OS-8.5 and OS-8.6). Therefore, the proposed project would be consistent with this policy. |
| **Economy: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all people in the region.** | |
| Improve access to jobs and educational resources. | **Consistent.** This RTP/SCS goal focuses on adopting policies and investments in regional infrastructure in support of improving regional economic development and competitiveness. Proposed Land Use policies such as LU-1.4, LU-1.9, LU-1.14 and LU-3.9 encourage employment opportunities and infrastructure improvements. Therefore, the proposed project would not adversely affect the ability of SCAG to align plan investments and policies with economic development and competitiveness and would contribute to achieving this goal by advancing the other RTP/SCS goals. |

**Table 5.10-2 SCAG Connect SoCal Consistency Analysis**

| Connect SoCal Goals | Project Consistency Analysis |
|---|---|
| Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities. | **Consistent**. This RTP/SCS goal focuses on adopting policies and investments in regional infrastructure in support of improving regional economic development and competitiveness. Proposed Land Use policies such as LU-1.4, LU-1.9, LU-1.14 and LU-3.9 encourage employment opportunities and infrastructure improvements. Therefore, the proposed project would not adversely affect the ability of SCAG to align plan investments and policies with economic development and competitiveness and would contribute to achieving this goal by advancing the other RTP/SCS goals. |

### Consistency with City Land Use Plans and Regulations

The proposed project is a regulatory document that sets the framework for future growth and development in the City and does not directly result in development. As discussed in Chapter 1, *Executive Summary*, Section 1.2.2, *Type and Purpose of This DEIR*, use of this Program DEIR provides the City an opportunity to consider broad policy and program wide mitigation measures to address project-specific and cumulative environmental impacts on a comprehensive scale.

As discussed in Chapter 3, *Project Description* the amendments to the Zoning Ordinance will codify the community's vision as established in the Focused General Plan Update process, facilitate the implementation of key General Plan concepts related to land use, and implement required Zoning Map changes and programs pursuant to the City's existing Certified Housing Element as discussed in Chapter 3, *Project Description*. Table 3-7, *Summary of Zoning Map, Regulations and Standards Updates,* in Chapter 3, *Project Description*, summarizes the proposed amendments to the City's Zoning Map to align with the General Plan Update and implement the City's existing, Certified Housing Element. Table 3-8 *Administrative and Procedural Zoning Ordinance Updates to Align with State Laws*, summarizes the Zoning Ordinance updates that are procedural, administrative, or required to formally align the City's Municipal Code with state laws and it's Certified Housing Element inclusive of all its "Programs" followed by a summary of the required amendments to the Zoning Ordinance text.

Furthermore, to implement the changes proposed by the Focused General Plan Update and the proposed Zoning Ordinance Update within the coastal zone, the City must also amend portions of both the Coastal Land Use Plan (CLUP) and Implementation Plan (IP) of its Local Coastal Program (LCP). Proposed changes to the CLUP include updates to the Land Use Map consistent with the Land Use Map in the Focused General Plan Update. Proposed changes to the IP will include updates to the Zoning Map within the Coastal Zone to implement the Focused General Plan Update and updates to the Zoning Ordinance for the Coastal Zone that largely mirror the changes described in the tables 3-7 and 3-8, above. Therefore, the General Plan Update would not conflict with the City's Zoning Ordinance or the LCP.

### Mitigation Measures

There are no feasible mitigation measures for this impact.

### Finding

The City finds that there are no mitigation measures that are feasible to fully reduce the proposed project's inconsistencies with the goals of SCAG's 2024–2050 RTP/SCS. As a result, future development in accordance with the proposed project would conflict with plans adopted for the purpose of avoiding or mitigating an environmental effect and project impacts, and cumulative impacts.

### Rationale for Finding

There are no feasible mitigation measures that could fully mitigate the proposed project's population growth and fully reduce the proposed project's inconsistencies with the goals of SCAG's 2024-2050 RTP/SCS. Implementation of the General Plan Update would foster development of a variety of housing options citywide that accommodates the lifestyles and affordability needs of all residents, while meeting the State-mandated Regional Housing Needs Allocation (RHNA) requirements for the City's Sixth Cycle Housing Element. Additionally, the proposed project would balance land uses with anticipated growth, including residential, retail, employment, open space, and public uses with existing land uses and community character. However, because the proposed project is a regulatory document that sets the framework for future growth and development in the City and does not directly result in development, changes to land uses would be assessed on a project-by-project basis. Therefore, the proposed project would continue to be inconsistent with the goals of SCAG's 2024-2050 RTP/SCS. Project and cumulative impacts would remain significant and unavoidable. (Draft PEIR pg. 5.10-15).

## 7. Population and Housing

**Impact 5.12-1: The proposed project would directly result in population growth in the project area. [Threshold P-1]**

One of the purposes of a general plan is to adequately plan for and accommodate future growth. As shown in Table 5.12-7, *Buildout Comparison of Existing Conditions to the Redondo Beach General Plan 2050*, implementation of the proposed project would allow for an increase of 4,956 housing units, 8,667 residents, and 7,989 jobs over approximately 20 years (see Appendix B, Buildout Methodology). Population projections are a conservative/reasonable estimate based on full buildout of the 2050 proposed project for the purpose of the CEQA analysis; however, it is worth noting that the current general plan failed to reach its population projection during the plan period.

### Housing and Population Growth

At the projected buildout, there would be 33,314 households and 78,978 people in Redondo Beach. As shown in Table 5.12-8, Buildout Comparison of the Redondo Beach General Plan to SCAG Projections, the forecast population and households (78,978 persons and 33,314 households) at proposed project buildout would exceed the SCAG growth projections (73,100 persons and 30,948 households) by 8 percent and 8 percent, respectively.

It is important to note the differences between project buildout and SCAG projections. SCAG projections are utilized in this analysis for general comparison purposes. Buildout of the City is not

linked to a development timeline and is based on a reasonable buildout of the parcels in the City. The proposed project is a regulatory document that sets the framework for future growth and development in the City and does not directly result in development. SCAG projections are based on annual increments in order to develop regional growth projections for land use and transportation planning over a 20-year horizon to 2050.

A comparison of the proposed project buildout to SCAG's population, housing, and employment projections assists in providing context for comparison. More importantly, the state of California has a shortage of housing. In 2019, Governor Newsom signed several bills to address the need for more housing, including the Housing Crisis Act of 2019 (SB 330). As discussed in Section 3, Project Description, of this PEIR, the buildout of the proposed project is consistent with other elements of the General Plan update and includes growth in the areas identified in the certified Housing Element as suitable for housing development by 2029. The proposed Land Use designations target change in areas essential to satisfy the City's State-mandated obligation to demonstrate it could meet its RHNA requirements for housing. The Redondo Beach Housing Element and the Land Use Element of the proposed project include policies to support a variety of housing types and densities. For example, Policies LU-1.1 and 1.2 of the Land Use Element require the City to provide a diversity of residential densities, product types, lot sizes, and designs to meet the community's demand. Thus, increases to population and housing units would be greater than SCAG's regional forecasts for 2050.

### Employment Growth

The proposed project would allow for 5,681,999 square feet of additional nonresidential development. The development would consist of job-generating land uses, such as commercial, office, industrial, and institutional uses. These uses are estimated to generate a total of 36,327 jobs, approximately 7,989 more jobs compared to existing conditions. This is considered a substantial increase in employment and an increase that would indirectly induce population growth. The forecast for employment (36,327 jobs) in the City at proposed project buildout would exceed the SCAG growth projections (31,100 jobs) by 17 percent. The Land Use Element identifies several policies aimed at promoting employment growth for Redondo Beach residents, such as Policy LU-6.3, LU-6.9, and LU-6.21. Nonetheless, buildout of the proposed project would directly and indirectly induce population and employment growth.

### Jobs-Housing Balance

As stated above, implementation of the proposed project would create up to 36,327 jobs and 35,387 residential units in Redondo Beach. This would result in the City's job-housing ratio increasing from 0.94 to 1.02 which would below APA's recommended range target of 1.5 jobs per housing unit and recommended range of 1.3 to 1.7 jobs per housing unit. The proposed project would introduce more job-generating land uses than are currently available. In general, the land uses identified in the proposed project would provide opportunities for residents to both live and work in the City rather than commuting to other areas. The Land Use Element identifies several policies aimed at promoting workforce/job balance for Redondo Beach residents, such as Policies LU-1.4, -6.2, -6.3, -6.9, and -6.21. Therefore, though buildout of the proposed project would directly and indirectly induce population and employment growth, the jobs-housing ratio in the City would improve the job-housing balance with implementation of the proposed project compared to both existing conditions and SCAG projections.

### Conclusion

Implementation of the proposed project would directly induce population and employment growth in the area but would slightly improve the jobs-housing balance. The proposed project would accommodate future growth by providing for infrastructure and public services to accommodate the projected growth (see Section 5.9, *Hydrology and Water Quality*; Section 5.13, *Public Services*; Section 5.15, *Transportation*; and Section 5.17, *Utilities and Service Systems*). Proposed policies under the Redondo Beach General Plan's Housing and Land Use Elements would ensure the City supports a variety of housing types and densities and provides job growth to accommodate Redondo Beach residents. Updates to the City's Zoning Ordinance and Zoning Ordinance for the Coastal Zone would include modifications for consistency with the proposed Focused General Plan Update, recently adopted Housing Element, and in the context of State laws such as Senate Bills 35 and 330. Updates to the Local Coastal Program (LCP) would include revisions to the Coastal Land Use Plan and Implementing Plan. These modifications would not involve land-use changes that would cause a greater increase in population and employment growth than what is considered under the Focused General Plan Update. Nonetheless, as the proposed project's buildout projections are greater than the projected growth through SCAG, implementation of the proposed project would result in a potentially significant impact related to population and employment growth.

### Mitigation Measures

The city finds that there are no feasible mitigation measures for this impact.

### Finding

The City finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code Section 21081(a)(1), (3); Guidelines Section 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the City has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

### Rationale for Finding

There are no feasible mitigation measures to reduce the proposed project's impacts to population growth. As a result, impacts to population growth, and cumulative impacts, as a result of future development in accordance with the proposed project, are ***significant and unavoidable*** (Draft PEIR pg. 5.12-13).

## 8. Transportation

**Impact 5.15-1: The proposed project would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. [Threshold T-1]**

The purpose of this section is to determine whether the proposed project conflicts with transportation-related programs, plans, ordinances, or policies addressing the circulation system. The proposed project is evaluated against the documents detailed in Section 5.15.1.1, Regulatory Background. In general, those documents focus on promoting multimodal transportation, reducing GHG emissions, and improving accessibility and safety for all users. Furthermore, the focus on complete streets, promotion of active transportation (e.g., walking, biking), and enhancing transit systems are relatively consistent across the policies and plans.

Table 5.15-3 of the PEIR, Programs, Plans, Ordinance, and Policy Consistency Review, details an evaluation of the regional and local plans and policies with which the proposed General Plan would have the potential to be inconsistent. As summarized in Table 5.15-3, several potential conflicts are identified with respect to SCAG's 2024-2050 RTP/SCS.

As shown in Table 5.15-3, the proposed project would conflict with some policies from SCAG's 2024–2050 RTP/SCS, as buildout facilitated by the proposed project would increase VMT per service population beyond the threshold (16.8% below SBCCOG Baseline Conditions) and would result in a significant impact, as further discussed below under Impact 5.15-2. Accordingly, the proposed project would generate long-term emissions that would exceed South Coast AQMD's regional significance thresholds and cumulatively contribute to the nonattainment designations of the SoCAB (see Section 5.2, Air Quality). Additionally, given the growth in population and employment within the City and the magnitude of GHG emissions reductions needed to achieve the GHG reduction target, GHG emissions are considered significant (see Section 5.7, Greenhouse Gas Emissions). Although the proposed project would include climate benefits, land use patterns, and goals and polices that align with the RTP/SCS, and would otherwise be consistent with implementation of programs, plans, ordinances, and policies addressing the circulation system, including transit, roadway, and bicycle and pedestrian facilities, impacts associated with VMT, Air Quality and GHG, would be significant and therefore, the proposed project would not be consistent with SCAG's 2024–2050 RTP/SCS and impacts would be significant.

### Mitigation Measures

The city finds that there are no feasible mitigation measures for this impact.

### Finding

The City finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of

these Findings (Public Resources Code Section 21081(a)(1), (3); Guidelines Section 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the City has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

### Rationale for Finding

There are no feasible mitigation measures to fully reduce the proposed project's inconsistencies with the goals of SCAG's 2024–2050 RTP/SCS. As a result, future development in accordance with the proposed General Plan Update may conflict with programs and plans addressing the circulation system and project and cumulative impacts would be ***significant and unavoidable.*** This conclusion does not preclude a finding of less-than-significant impacts at the project level (Draft PEIR pg. 5.15-49).

## IV. ALTERNATIVES TO THE PROPOSED PROJECT

An EIR must briefly describe the rationale for selection and rejection of alternatives. The lead agency may make an initial determination as to which alternatives are feasible and therefore merit in-depth consideration, and which ones are infeasible.

Section 15126.6 of the State CEQA Guidelines requires an EIR to describe a range of reasonable alternatives to the project, or to the location of the project that could feasibly achieve most of its basic objectives but would avoid or substantially lessen any of the significant effects identified in the EIR analysis. An EIR is not required to consider every conceivable alternative to a proposed project. Rather, an EIR must consider a reasonable range of alternatives that are potentially feasible; an EIR is not required to consider alternatives that are infeasible. In addition, an EIR should evaluate the comparative merits of the alternatives. Therefore, this section describes the potential alternatives to the project analyzed in the EIR and evaluates them in light of the objectives of the project, as required by CEQA.

Key provisions of the State CEQA Guidelines relating to the alternatives' analysis (Section 15126.6 et seq.) are summarized below:

- "The discussion of alternatives shall focus on alternatives to the Project or its location which are capable of avoiding or substantially lessening any significant effects of the Project, even if these alternatives would impede to some degree the attainment of the Project objectives or would be more costly." (CEQA Guidelines Section 15126.6[b]).

- "The specific alternative of 'no project' shall also be evaluated along with its impact." (CEQA Guidelines Section 15126.6[e][1])

- "The no project analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the 'no project' alternative,

the EIR shall also identify an environmentally superior alternative among the other alternatives." (CEQA Guidelines Section 15126.6[e][2])

- "The range of alternatives required in an EIR is governed by a 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project." (CEQA Guidelines Section 15126.6[f])

- "Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries…, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)" (CEQA Guidelines Section 15126.6[f][1]).

- "Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR." (CEQA Guidelines Section 15126.6[f][2][A])

- "An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative." (CEQA Guidelines Section 15126.6[f][3])

## A. RATIONALE FOR SELECTING POTENTIALLY FEASIBLE ALTERNATIVES

The alternatives must include a no-project alternative and a range of reasonable alternatives to the Project if those reasonable alternatives would attain most of the project objectives while substantially lessening the potentially significant project impacts. The range of alternatives discussed in an EIR is governed by a "rule of reason," which the State CEQA Guidelines Section 15126.6(f)(3) defines as:

> . . . set[ting] forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision-making.

Among the factors that may be taken into account when addressing the feasibility of alternatives (as described in the State CEQA Guidelines Section 15126.6(f)([1]) are environmental impacts, site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the project proponent could reasonably acquire, control, or otherwise have access to an alternative site. An EIR need not consider an alternative whose effects could not be reasonably identified, and whose implementation is remote or speculative.

For purposes of this analysis, the project alternatives are evaluated to determine the extent to which they attain the basic project objectives while significantly lessening any significant effects of the project.

## B. ALTERNATIVES CONSIDERED AND REJECTED DURING THE SCOPING/PROJECT PLANNING PROCESS

The following is a discussion of the alternatives considered during the scoping and planning process and the reasons why they were not selected for detailed analysis in the Draft PEIR.

### Alternative Location

The proposed project covers the entire City of Redondo Beach. Alternative locations are typically included in an environmental document to avoid, lessen, or eliminate the significant impacts of a project by considering the proposed development in an entirely different location. To be feasible, development of off-site locations must be able to fulfill the project purpose and meet most of the project's objectives. Given the nature of the proposed project (adoption of a Redondo Beach General Plan, Zoning Ordinance Updates, and Local Coastal Program Amendment for the entire City), it is not possible to consider an off-site alternative. For this reason, an offsite alternative was considered infeasible pursuant to State CEQA Guidelines Section 15126.6(c) and rejected as a feasible project alternative.

#### Finding

The City finds that there are no alternative development areas for the proposed project as the City does not have jurisdiction over land uses outside of the City's boundaries. As described in these Findings of Fact, the proposed project would result in less than significant impacts or impacts that can be mitigated to less than significant. For significant and unavoidable impacts, the City has determined that these impacts are acceptable because of specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment, as described in the Statement of Overriding Considerations.

### Reduced Residential Density and Intensity Alternative

A Reduced Residential Density and Intensity Alternative would result in fewer residences and nonresidential uses, which would theoretically reduce traffic and thereby reduce community impacts such as air quality, GHG emissions, noise, and demand for utilities and public services. However, such an alternative would not achieve or would only partially achieve the proposed project objectives of providing for growth and job creation within the City. This alternative would not be consistent with regional planning strategies that require accommodation of regional housing needs as established by the State of California and would be inconsistent with the existing certified Housing Element. Finally, by restricting residential and nonresidential growth, the environmental impact of the projected growth would increase development pressure elsewhere in the region, which could increase vehicle miles travelled (VMT) and thereby further degrade air quality and increases in GHG emissions. If regional growth estimates remain constant, it is reasonable to assume that a Reduced Residential Density and Intensity Alternative would relocate impacts from development to other agencies outside of the City and would not meet the project objectives locally or regionally, therefore this option was not evaluated in the Draft PEIR.

### Finding

The City finds that this alternative would not be consistent with the Housing Element and would not meet regional housing needs. As described in these Findings of Fact, the proposed project would result in less than significant impacts or impacts that can be mitigated to less than significant. For significant and unavoidable impacts, the City has determined that these impacts are acceptable because of specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment, as described in the Statement of Overriding Considerations.

## C. ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

The following alternatives were determined to represent a reasonable range of alternatives with the potential to feasibly attain most of the basic objectives of the project but avoid or substantially lessen any of the significant effects of the project.

### No Project Alternative

Under the No Project/Existing General Plan Alternative, the proposed General Plan Update, Zoning Ordinance, and Local Coastal Amendment would not be implemented by the City. The current General Plan, Zoning Code, and Local Coastal Program would remain in effect. Buildout statistics for the proposed project and the current General Plan are compared in Table 6-1. It should be noted that the existing conditions within the City do not meet the current General Plan buildout, therefore there would still be growth within the City under this alternative. The proposed land use designations under the proposed project would not be implemented under this alternative.

Impacts of the No Project/Existing General Plan alternative would be similar for aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, energy, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, mineral resources, noise, population and housing, transportation, tribal cultural resources, and wildfire. Impacts would be greater for land use and planning. Impacts would be reduced for public services, recreation, and utilities and service systems.

### Finding

The No Project/Existing General Plan Alternative would meet most of the project objectives but to a lesser extent and would not meet the objectives of 1, 2, and 9; however, this alternative would not implement the proposed project policies, which are designed to further enhance the project objectives compared to the current General Plan. Under this alternative, the current Redondo Beach General Plan would not be updated to address changes in state laws and the Redondo Beach General Plan would continue to be out-of-compliance with the latest legislation. The City Council hereby rejects the No Project/Current General Plan Alternative for the foregoing reasons, each of which, standing alone, is sufficient to justify rejection of the Alternative.

### Increased Residential Density and Intensity in Transit Oriented Design (TOD) Areas Alternative

The Increased Residential Density and Intensity in TOD Areas Alternative would increase buildout beyond what is projected by the proposed project and would concentrate the additional residential and non-residential growth in TOD areas. While growth would occur citywide, and in compliance with the certified housing element, like the proposed project, and the No Project Alternative, under this alternative residential density and non-residential intensity would increase in Special Policy Areas 1, Tech District, and 2, Galleria District (see Figure 3-5, Proposed Land Use Plan), which are located in close proximity to existing and proposed metro stations. As shown below in Table 6-2, the Increased Residential Density and Intensity in TOD Areas Alternative would result in an approximately 9.7% increase in population (7,671 persons), 9.6% more dwelling units (3,424 dwelling units) and 8.1% more non-residential square footage (1.4 million square feet) compared to the proposed project.

Under this alternative, residential density and nonresidential land use intensity would occur throughout the City consistent with the proposed project; however, the additional growth would be concentrated and increased in Special Policy Areas 1, Tech District, and 2, Galleria District. Under this alternative, non-residential growth would need to increase relative to the increase in residential density in TOD areas in order to implement a land use pattern that reduces VMT. Implementation of this alternative would require greater FAR and residential density, as compared to the proposed project, which would likely result in changes to development standards within the TOD areas to allow for increased building heights and minimal setbacks to accommodate greater development.

#### Finding

Impacts of the Increased Residential Density and Intensity in TOD Areas Alternative would be similar for agriculture and forestry resources, biological resources, cultural resources. geology and soils, hazards and hazardous materials, hydrology and water quality, noise, mineral resources, tribal cultural resources, and wildfire. Impacts would be greater for aesthetics, population and housing, public services, recreation, and utilities and system services. Impacts would be slightly reduced for air quality, energy, GHG emissions, land use and transportation. The Increased Residential Density and Intensity in TOD Areas Alternative would meet three project objectives to a lesser extent, and would only meet one project objective to a greater extent as compared to the proposed project. The City Council hereby rejects the Increased Residential Density and Intensity in TOD Areas Alternative for the foregoing reasons, each of which, standing alone, is sufficient to justify rejection of the Alternative.

## D. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The Increased Residential Density and Intensity in TOD Areas Alternative would slightly reduce impacts to air quality, energy, GHG emissions, and transportation. Other impacts would increase as compared to the proposed project, such as aesthetics, population and housing, public services, recreation, and utilities and system services. The Increased Residential Density and Intensity in TOD Areas Alternative would slightly reduce the effect on the environment with respect to regional VMT and thus air quality and GHG emissions, and energy, but would not eliminate a significant impact identified in the Draft PEIR. Therefore, the Increased Residential Density and Intensity in TOD Areas Alternative is the "environmentally superior" alternative as it slightly reduces the overall impact on the

environment compared to the proposed project. Table 6-3 shows how each of the alternatives meets the project objectives. The Increased Residential Density and Intensity in TOD Areas Alternative would meet all the project objectives but to a lesser extent. Although the Increased Residential Density and Intensity in TOD Areas Alternative is deemed the "environmentally superior" alternative, all the alternatives would result in the same determination in terms of their level of impact, No Impact; Less than Significant; Less than Significant with Mitigation Incorporated; Significant and Unavoidable for each of the issue areas analyzed.

## V. ADDITIONAL CEQA CONSIDERATIONS

## A. SIGNIFICANT IRREVERSIBLE CHANGES DUE TO THE PROJECT

Section 15126.2(c) of the State CEQA Guidelines requires that an EIR describe any significant irreversible environmental changes that would be caused by the proposed project should it be implemented. Specifically, the State CEQA Guidelines state:

> Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highways improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Generally, a project would result in significant irreversible environmental changes if:

- The primary and secondary impacts would generally commit future generations to similar uses;
- The project would involve a large commitment of nonrenewable resources;
- The project would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- The proposed irretrievable commitments of nonrenewable resources are not justified (e.g., the project involves the wasteful use of energy).

In the case of the proposed project, implementation would cause the following significant irreversible changes:

- Implementation of the proposed project would include construction activities that would entail the commitment of nonrenewable and/or slowly renewable energy resources; human resources; and natural resources such as lumber and other forest products, sand and gravel, asphalt, steel, copper, lead, other metals, water, and fossil fuels. Future developments in accordance with the proposed project would require the use of natural gas and electricity, fossil fuels, and water. The commitment of resources required for the construction and operation of the proposed project would limit the availability of such resources for future generations or for other uses during the life of the project.

- An increased commitment of social services and public maintenance services would also be required (e.g., police, fire, schools, libraries, and sewer and water services). The energy and social service commitments would be long-term obligations in view of the low likelihood of returning the land to its original condition once it has been developed.

- Population growth related to project implementation would increase vehicle trips over the long term. Emissions associated with such vehicle trips would continue to contribute to the South Central Coast Air Basin's nonattainment designation for ozone ($O_3$) and particulate matter ($PM_{10}$).

- Future development in accordance with the proposed project is a long-term irreversible commitment of vacant parcels of land or redevelopment of existing developed land in the city.

Given the low likelihood that the land would revert to lower intensity uses or to its current form, the proposed project would generally commit future generations to these environmental changes.

## B. GROWTH-INDUCING IMPACTS OF THE PROPOSED PROJECT

Pursuant to Section 15126(d) and 15126.2(d) of the State CEQA Guidelines, this section is provided to examine ways in which the Project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. To address this issue, potential growth-inducing effects will be examined through analysis of the following questions:

- Would this project remove obstacles to growth, e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development?

- Would this project result in the need to expand one or more public services to maintain desired levels of service?

- Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?

- Would approval of this project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?

Please note that growth-inducing effects are not to be construed as necessarily beneficial, detrimental, or of little significance to the environment. This issue is presented to provide additional information on ways in which this project could contribute to significant changes in the environment, beyond the direct consequences of developing the land use concept examined in the preceding sections of this EIR.

**Would this project remove obstacles to growth, e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development?**

Future growth facilitated by the proposed project would allow for infill development and intensification in the City. This would indirectly induce construction of site-specific infrastructure

upgrades, extensions, and improvements, such as roadways, storm drains, sewer lines, water pipes, solid waste collection systems, and energy/communications extensions. Additionally, the proposed project would induce growth through the removal of obstacles to development by simplifying and streamlining land use and zoning regulations for the project area. The proposed project does not, however, propose any specific infrastructure improvements that would result in growth. The proposed project does not approve the construction of specific development projects and would largely accommodate growth based on specific, future development proposals pursuant to market conditions. However, in some locations, the project would allow increased development intensity and/or mix of land uses (e.g., residential development of different densities on the same property, or a combination of retail and/or office land uses and residential land uses) compared to existing conditions. Specifically, the proposed project provides opportunities for intensification or reuse of focused areas of the City and targets change in areas essential to satisfy the City's State-mandated obligation to demonstrate it could meet its Regional Housing Needs Allocation (RHNA) requirements for housing. Therefore, the proposed project removes regulatory obstacles to growth and is considered growth inducing.

**Would this project result in the need to expand one or more public services to maintain desired levels of service?**

The proposed project is a regulatory document that sets the framework for future growth and development in the City and does not directly result in development. Direct growth-inducing impacts are commonly associated with the extension of new public services, utilities, and roads into areas that have previously been undeveloped. Growth facilitated by the proposed project would allow for infill development and intensification in the City, which is already served by public services. As discussed in Section 5.13, *Public Services*, there are several mechanisms in place to ensure there is adequate funding for expansion of services as buildout facilitated by the proposed project continues, such as budgets, development impact fees, and coordination with local and regional agencies. Future projects facilitated by the proposed project would be evaluated on an individual basis for conformance with funding mechanisms as applicable. Over time, the City anticipates the need to expand services to meet the needs of growth envisioned in the proposed project.

**Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?**

Implementation of the proposed project would encourage or facilitate economic effects. Temporary jobs would be created during development of future projects (e.g., design, planning, engineering, construction, etc.), facilitated by the proposed project, which would result in direct economic effects. As the population grows and occupies new dwellings units in accordance with the proposed project, new residents would seek shopping, entertainment, employment, home improvement, and other economic opportunities in the surrounding area. This would facilitate economic transactions of goods and services and could, therefore, encourage the creation of new businesses and/or the expansion of existing businesses to address these economic needs. Furthermore, the proposed increases in development capacity for office, commercial, and retail uses would serve the shopping and services needs of the future residents and would generate additional employment opportunities. The physical impacts of job growth are reflected in the analysis in the Draft PEIR and are expected to be localized in the City. As the proposed project is a regulatory document and does not directly result in development, before any development or redevelopment activities would occur in the City, such

activities would be analyzed for conformance with applicable local, state, and federal requirements to ensure that future projects would not adversely affect the environment. There is nothing unusual about the anticipated growth facilitated by the proposed project that would significantly affect the environment.

**Would approval of this project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?**

Cities and counties in California periodically update their general plans elements pursuant to California Government Code Sections 65300 et seq., and the adoption of these types of plans do not necessarily set a precedent that could encourage and facilitate other activities that may significantly affect the environment. The General Plan Update refines and adds to the goals and policies and changes land uses in the City. New and/or modified goals and policies in the proposed General Plan Update either replace, supplement, or elaborate on those in the existing General Plan. Updates to the Zoning Ordinance and Local Coastal Program (LCP) would involve land-use changes that would be consistent with the General Plan Update. Development facilitated by the proposed project would be reviewed for consistency with the General Plan and may tier from the General Plan EIR if appropriate. Future development proposals would be reviewed on a project-by-project basis for conformance with the General Plan, zoning requirements, and other applicable local, state, and federal requirements to ensure that future projects would not adversely affect the environment. Moreover, no changes to any of the City's building safety standards (building, grading, plumbing, mechanical, electrical, fire codes) are proposed or required to implement the proposed project. Although the proposed project would include actions that set precedents within the City to facilitate future growth, these precedents are not anticipated to encourage and/or facilitate other activities that could significantly affect the environment.

## VI. FINDINGS ON RESPONSES TO COMMENTS ON THE DRAFT PEIR AND REVISIONS TO THE FINAL PEIR

The Final PEIR contains response to comments, clarifications, revisions, and corrections to the Draft PEIR. The focus of the response to comments is on the disposition of significant environmental issues raised in the comments, as specified by State CEQA Guidelines Section 15088(b). In Section 2 of the Final PEIR, the City provided written responses to each comment made by a public agency, pursuant to State CEQA Guidelines Section 15088(b), and revisions and corrections to the Draft PEIR are in Section 3 of the Final PEIR.

CEQA requires that a lead agency recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review, but before certification. "Information" includes changes in the project. Recirculation is not required where the new information added to the EIR merely clarifies, amplifies or makes insignificant modifications in an adequate EIR.

New information is not considered significant unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect, that the project's proponents have declined to implement. "Significant new information" includes a disclosure showing that:

- A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented;

- A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted;

- A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it; or

- The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

Based on the responses to comments, the Planning Commission's recommendations, and in those instances noted below, planning staff recommendations, changes to the project considered include the following:

- In response to a comment letter submitted by the California Department of Conservation, references to the State Tsunami Hazard Area Maps and ASCE Tsunami Design Zone Maps were incorporated; The correction of the sources and updates to figures does not change the conclusions reached by the Draft PEIR.

- In response to public comments and Planning Commission's recommendations proposed changes/edits to the Land Use Element and Implementation Actions (See Section 3, *Revisions to the Draft PEIR* of the Final PEIR) are being considered. These proposed text updates to the policies and implementation actions of the Land Use Elements do not change the conclusions reached by the Draft PEIR.

- In response to a letter submitted to the City by the Redondo Beach Unified School District (RBUSD) on the General Plan Update (dated July 17, 2024), revisions have been considered to change the proposed land use designation of Open Space (OS) to Public Institutional (PI) at the Lincoln Elementary School Fields and Blacktop Area, the Alta Vista Elementary School Fields, and the former Franklin School Site. This change to the proposed land use does not change the analysis or impact conclusion of the Final PEIR as the three subject properties are currently designated as Public Institutional (PI), which is consistent with the current and future intended use of the property. These three sites were not factored into the open space calculations included in the Open Space and Conservation Element and reverting the properties back to their original designation will have no material effect on the Final PEIR.

- In response to planning staff's and the Planning Commission's recommendations, revisions have been considered to not change the existing land use designation of the AES powerplant site and the SCE ROW site to Public Utility (PU) but retain their Public or Institutional (P) designations. The current General Plan includes a "P" (Public or Institutional) designation for the AES powerplant site and the SCE ROW and the only permitted uses allowed by the Zoning Ordinance and LCP for the AES site are park/open space and utilities. The SCE ROW also conditionally permits agricultural uses, parking lots, and accessory structures in addition to the uses allowed on

the AES site. The updated General Plan considered changing these properties to a newly created designation, Public Utility (PU), which is defined as providing "for utility uses including easements with public access for recreation and parking." Since the time that this designation was created, the powerplant has been decommissioned and is no longer in operation. Additionally, some changes are likely to the associated SCE ROW infrastructure in the future. Staff and the Planning Commission therefore recommends maintaining the original designation of these properties as "P" (Public or Institutional), which provides Governmental administrative and capital facilities, parks, schools, libraries, hospitals and associated medical offices, public cultural facilities, public open space, utility easements, and other public uses. Therefore, maintaining the properties with their original designation will have no material effect on the Final PEIR.

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- In response to planning staff's and the Planning Commission's recommendations, revisions have been considered to raise the proposed minimum non-residential FAR from 0.35 to 0.40 for all Mixed-Use land use designations. This revision would have no material effect on the FPEIR.

- In response to planning staff's and the Planning Commission's recommendations, revisions have been considered to change all Utility (U) designation to Public (P). The proposed Public/Utility (U) land use designation provides for utility uses including easements with public access for recreation and parking. Maximum FAR 0.10. Therefore, this revision would have no material effect on the FPEIR.

None of this material constitutes the type of significant new information that requires recirculation of the Draft PEIR for further public comment under CEQA Guidelines Section 15088.5. None of this new material indicates that the project will result in a significant new environmental impact not previously disclosed in the Draft PEIR. Additionally, none of this material indicates that there would be a substantial increase in the severity of a previously identified environmental impact that will not be mitigated, or that there would be any of the other circumstances requiring recirculation described in Section 15088.5 of the CEQA Guidelines.

## VII. STATEMENT OF OVERRIDING CONSIDERATIONS

CEQA requires decision makers to balance the benefits of the proposed project against its unavoidable environmental risks when determining whether to approve the project. If the benefits of the project outweigh the unavoidable adverse effects, those effects may be considered "acceptable" (State CEQA Guidelines Section 15093[a]). CEQA requires the agency to support, in writing, the specific reasons for considering a project acceptable when significant impacts are infeasible to mitigate. Such reasons must be based on substantial evidence in the Final PEIR or elsewhere in the administrative record (State CEQA Guidelines Section 15093 [b]). The agency's statement is referred to as a Statement of Overriding Considerations.

The following provides a description of the project's significant and unavoidable adverse impact and the justification for adopting a statement of overriding considerations.

## A. SIGNIFICANT AND UNAVOIDABLE IMPACTS

Although most potential project impacts have been substantially avoided or mitigated, as described in the Findings of Fact, 12 project impacts remain for which complete mitigation is not feasible. The EIR identified the following significant unavoidable adverse impacts of the project.

### Air Quality

- **Impact 5.2-1**
- **Impact 5.2-2**
- **Impact 5.2-3.**
- **Impact 5.2-4**

### Cultural Resources

- **Impact 5.4-1.**

### Energy

- **Impact 5.5-2**

#### Greenhouse Gas Emissions

- **Impact 5.7-1.**
- **Impact 5.7-2**

#### Land Use and Planning

- **Impact 5.10-2**

#### Noise

- **Impact 5.11-1**

#### Population and Housing

- **Impact 5.12-1**

#### Transportation

- **Impact 5.15-1**

## B. PROJECT BENEFITS IN SUPPORT OF THE STATEMENT OF OVERRIDING CONSIDERATIONS

This section describes the benefits of the proposed project that outweigh the project's unavoidable adverse effects and provides specific reasons for considering the project acceptable even though the Final PEIR has indicated that 12 significant project impacts cannot be mitigated to a less-than-significant level. Pursuant to CEQA Guidelines Section15093(c), the Statement of Overriding

Considerations will be included in the record of the project approval and will also be noted in the Notice of Determination. Each of the benefits identified below provides a separate and independent basis for overriding the significant environmental effects of the proposed project.

Having reduced the potential effects of the proposed project through all feasible mitigation measures, as described previously, and balancing the benefits of the proposed project against its potential unavoidable adverse impacts on air quality, cultural resources, energy, GHG emissions, land use and planning, noise, and population and housing, and transportation, the City finds that the following legal requirements and benefits of the proposed project individually and collectively outweigh the potentially significant unavoidable adverse impacts for the following reasons.

### Implements the Objectives Established for the Proposed Project

The proposed project would provide goals and policies that would facilitate and achieve the project objectives:

1. Foster development of a variety of housing options citywide that accommodates the lifestyles and affordability needs of all residents, while meeting the State-mandated Regional Housing Needs Allocation (RHNA) requirements for the City's Sixth Cycle Housing Element.

2. Reduce automobile traffic volume and congestion by promoting safe, efficient, multimodal transportation that provides alternatives to the car.

3. Ensure that the City is both a place to live and work by matching its residents to jobs and promoting a workforce/jobs balance.

4. Protect and enhance the City's existing Aerospace Industry and economic identity.

5. Support resident's health and vitality through the preservation and expansion of public open space for active and passive recreation throughout the City.

6. Create more walkable and bike friendly interconnected neighborhoods through the development of new parks, trails, and sports facilities.

7. Promote creativity, innovation, and technological advances to attract businesses that are on the cutting edge of their industries.

8. Create unique destinations for residents, employers, and visitors, while maintaining existing neighborhoods and preserving public space.

9. Balance City growth in an environmentally, sustainably, economically, and fiscally responsible way.

### Accommodates an Increase in Housing That Helps Achieve the City's Regional Housing Needs

The proposed project would accommodate 4,956 new housing units compared to existing conditions, exceeding the RHNA goal of 2,490 new units. To make meaningful reforms to the housing crisis in California, the State Department of Housing and Community Development (HCD) recently declared

that cities and counties in Southern California will have to plan for the construction of 1.3 million new homes in the next decade. The Southern California Association of Governments (SCAG) distributed the increased targets to jurisdictions based on factors such as jobs, households, and affordability that were considered in the City's 2021-2029 Housing Element Update. For cities and counties that do not perform, the state can withhold state transportation revenue generated from Senate Bill 1 (2017). The proposed project includes refinements to the Policy Plan to comply with State housing mandates and accommodate the mandatory Regional Housing Needs Assessment (RHNA) allocation.

## Conclusion

The City Council hereby declares that, pursuant to the State CEQA Guidelines section 15093, the City Council has balanced the benefits of the proposed project against any unavoidable environmental impacts in determining whether to approve the proposed project. Pursuant to the State CEQA Guidelines, if the benefits of the proposed project outweigh the proposed project's unavoidable adverse environmental impacts, those impacts may be considered "acceptable."

Having reduced the adverse significant environmental effects of the proposed project to the extent feasible by adopting the mitigation measures in the EIR, the Mitigation Monitoring and Reporting Program (MMRP), and this Resolution; having considered the entire administrative record on the proposed project; and having weighed the benefits of the proposed project against its unavoidable adverse impact after mitigation, the City Council has determined that each of the following social, economic, and environmental benefits of the proposed project, separately and individually, outweighs the proposed project's potential unavoidable adverse impacts and renders those potential adverse environmental impacts acceptable based on the following overriding considerations. In addition to providing goals and policies that would facilitate and achieve the project objectives as described in Section VII, B, the proposed project will:

A. Update to the Redondo Beach General Plan to include goals and policies that comply with new State laws.

B. Balance land uses with anticipated growth, including residential, retail, employment, open space, and public uses with existing land uses and community character.

C. Link Redondo Beach's community goals and vision related to land use, housing, safety, and open space and conservation to the General Plan Update.

D. Provide employment and housing opportunities within the City consistent with the goals of the Southern California Association of Governments' Sustainable Communities Strategy.

E. Foster the development of pedestrian- and transit-oriented environments that create appealing and safe pedestrian areas to reduce automobile dependence.

F. Maintain Redondo Beach's existing neighborhoods and districts to foster a positive sense of identity and belonging among residents and businesses.

G. Establish a framework for using and managing the city's natural resources sustainably.

The City Council hereby declares that the foregoing benefits provided to the public through the approval and implementation of the proposed project outweigh the identified significant adverse environmental impacts of the proposed project that cannot be mitigated. The City Council finds that each of the proposed project's benefits separately and individually outweighs all of the unavoidable adverse environmental effects identified in the EIR, and therefore finds those impacts to be acceptable.

## VIII. MITIGATION MONITORING AND REPORTING PROGRAM

Pursuant to Public Resources Code section 21081.6, the City Council hereby adopts the Mitigation Monitoring and Reporting Program ("MMRP") attached as Exhibit "C." Implementation of the mitigation measures in the MMRP is hereby made a condition of approval of the project. In the event of any inconsistencies between the mitigation measures herein and the MMRP, the MMRP shall control.

## IX. CERTIFICATION

The City Council finds that it has been presented with the EIR, which it has reviewed and considered, and further finds that the EIR is an accurate and objective statement that has been completed in full compliance with CEQA, the State CEQA Guidelines, and the City's local CEQA procedures, and that the EIR reflects the independent judgment and analysis of the City Council.

The City Council declares that no evidence of new significant impacts that would require recirculation, as defined by State CEQA Guidelines Section 15088.5, has been received by the City Council after circulation of the Draft PEIR.

Therefore, the City Council hereby certifies the EIR based on the entirety of the record of proceedings.

RESOLUTION NO. CC-2410-105

A RESOLUTION OF THE CITY COUNCIL OF REDONDO BEACH, CALIFORNIA, CERTIFYING THE FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT (STATE CLEARINGHOUSE NUMBER 2023050732), ADOPTING FINDINGS PURSUANT TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT, ADOPTING A STATEMENT OF OVERRIDING CONSIDERATIONS, AND ADOPTING A MITIGATION MONITORING AND REPORTING PROGRAM FOR THE REDONDO BEACH FOCUSED GENERAL PLAN UPDATE, ZONING ORDINANCE UPDATE AND LOCAL COASTAL PROGRAM AMENDMENT

"EXHIBIT B"

October 2024 | Final Program Environmental Impact Report
State Clearinghouse No. 2023050732

# REDONDO BEACH FOCUSED GENERAL PLAN UPDATE, ZONING ORDINANCE UPDATE, AND LOCAL COASTAL PROGRAM AMENDMENT

City of Redondo Beach


*Prepared for:*
**City of Redondo Beach**
Contact: Marc Wiener, Community Development Director
Sean Scully, Planning Manager
415 Diamond Street
Redondo Beach, California 90277
310.318.0637

*Prepared by:*
**PlaceWorks**
Contact: Mark Teague, Principal
3 MacArthur Place, Suite 1100
Santa Ana, California 92707
714.966.9220
info@placeworks.com
www.placeworks.com


PLACEWORKS

# Table of Contents



## APPENDICES



## LIST OF TABLES

# Table of Contents

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# 1. Introduction

## 1.1 INTRODUCTION

This Final Program Environmental Impact Report (FPEIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code §§ 21000 et seq.) and CEQA Guidelines (California Code of Regulations §§ 15000 et seq.).

According to the CEQA Guidelines, Section 15132, the FPEIR shall consist of:

(a) The Draft Program Environmental Impact Report (DPEIR) or a revision of the Draft;

(b) Comments and recommendations received on the DPEIR either verbatim or in summary;

(c) A list of persons, organizations, and public agencies commenting on the DPEIR;

(d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and

(e) Any other information added by the Lead Agency.

This document contains responses to comments received during the public review period on the DPEIR for the Redondo Beach Focused General Plan Update, Zoning Ordinance Updates, and Local Coastal Program Amendment, which began August 1, 2024, and closed September 16, 2024. This document has been prepared in accordance with CEQA and the CEQA Guidelines and represents the independent judgment of the Lead Agency ("City of Redondo Beach" or "City"). This document and the circulated DPEIR and Mitigation Monitoring and Reporting Program (MMRP) comprise the FPEIR, in accordance with CEQA Guidelines, Section 15132. The MMRP is included as Appendix C to this FPEIR.

## 1.2 FORMAT OF THE FPEIR

This document is organized as follows.

***Section 1, Introduction.*** This section describes the relevant CEQA requirements for and contents of this FPEIR.

***Section 2, Response to Comments.*** This section provides a list of agencies and interested persons commenting on the DPEIR, copies of comment letters received during the public review period, and individual responses to written comments. To facilitate review of the responses, each comment letter has been reproduced and assigned a number (A1 through A3 for letters received from agencies, O1 through O3 for letters received from organizations, and R1 through R7 for letters received from community members). Individual comments within each comment letter have also been numbered, and each comment letter is followed by responses that reference the corresponding comment number.

***Section 3. Revisions to the Draft PEIR.*** This section contains revisions to the DPEIR's text and figures proposed as a result of the comments received by agencies and interested persons, as described in Section 2, and/or errors and omissions discovered subsequent to release of the DPEIR for public review.

The responses to comments contain material and revisions that will be added to the text of the FPEIR. The City of Redondo Beach staff has reviewed this material and determined that none of this material constitutes the type of significant new information that requires recirculation of the DPEIR for further public comment under CEQA Guidelines Section 15088.5. None of this new material indicates that the project will result in a significant new environmental impact not previously disclosed in the DPEIR. Additionally, none of this material indicates that there would be a substantial increase in the severity of a previously identified environmental impact that will not be mitigated, or that there would be any of the other circumstances requiring recirculation described in Section 15088.5.

## 1.3 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204(a) outlines parameters for submitting comments and reminds persons and public agencies that the focus of review of and comments on DPEIRs should be

> ... on the sufficiency of the document in identifying and analyzing possible impacts on the environment and ways in which significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that 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. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.

CEQA Guidelines Section 15204 (c) further advises, "Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence." Section 15204 (d) also states, "Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency's statutory responsibility." Section 15204 (e) states, "This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section."

In accordance with CEQA, Public Resources Code Section 21092.5, copies of the written responses to comments submitted by public agencies will be forwarded to those agencies at least 10 days prior to certifying the environmental impact report. The responses will be forwarded with copies of this FPEIR, as permitted by CEQA, and will conform to the legal standards established for response to comments on DPEIRs.

# 2. Response to Comments

Section 15088 of the CEQA Guidelines requires the Lead Agency (City of Redondo Beach) to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the DPEIR and prepare written responses. This section provides all comments received on the DPEIR and the City's responses to each comment. Comment letters and specific comments within those comment letters are given letters and numbers for reference purposes. Where sections of the DPEIR are excerpted in this document, the sections are shown indented. Changes to the DPEIR text are shown in underlined text for additions and ~~strikeout~~ for deletions.

Table 2-1, *List of Commenters,* provides a list of agencies and persons that submitted comments on the DPEIR and the General Plan Update during the public review period held between August 1, 2024 through September 16, 2024, and Planning Commission hearings held on September 19, 2024. In addition to the comment letters received on the DPEIR, this section of the FPEIR also notes the recommendations from planning staff on proposed changes to the General Plan Update and provides responses on the effect of the proposed changes to conclusions presented in the DPEIR.

Table 2-1 List of Commenters

| Number Reference | Commenting Person/Agency | Date of Comment | Page No. |
|---|---|---|---|
| Agencies | | | |
| A1 | California Coastal Commission | 8/7/24 | 2-3 |
| A2 | Los Angeles County Airport Land Use Commission | 8/15/24 | 2-5 |
| A3 | California Geological Survey | 9/6/24 | 2-7 |
| A4 | Beach Cities Health District | 9/11/24 | 2-14 |
| A5 | Los Angeles County Metropolitan Transportation Authority | 9/16/24 | 2-38 |
| Organizations | | | |
| O1 | Morongo Band of Mission Indians | 8/16/24 | 2-44 |
| O2 | StopBCHD | 9/20/24 | 2-46 |
| O3 | StopBCHD | 9/19/24 | 2-50 |
| O4 | Mark Nelson on behalf of StopBCHD | 9/17/24 | 2-58 |
| O5 | Mark Nelson on behalf of StopBCHD | 9/17/24 | 2-61 |
| O6 | Mark Nelson on behalf of StopBCHD | 9/17/24 | 2-63 |

# 2. Response to Comments

Table 2-1 List of Commenters

| Number Reference | Commenting Person/Agency | Date of Comment | Page No. |
|---|---|---|---|
| Residents | | | |
| R1 | Geoff Gilber | 8/15/24 | 2-65 |
| R2 | Mark Nelson | 8/15/24 | 2-68 |
| R3 | Mark Nelson | 8/15/24 | 2-71 |
| R4 | Mark Nelson | 8/15/24 | 2-73 |
| R5 | Mark Nelson ` | 8/19/24 | 2-75 |
| R6 | Frank Briganti | 8/15/24 | 2-78 |
| R7 | Charlie S | 8/15/24 | 2-80 |

## LETTER A1 – California Coastal Commission

Comment Letter A1

**From:** Seifert, Chloe@Coastal <chloe.seifert@coastal.ca.gov>
**Sent:** Wednesday, August 7, 2024 10:14 AM
**To:** Sean Scully <Sean.Scully@redondo.org>
**Cc:** Marc Wiener <Marc.Wiener@redondo.org>; Dobson, Amber@Coastal <amber.dobson@coastal.ca.gov>
**Subject:** Draft EIR (General Plan Update)

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

Good morning Sean,

Staff received the draft EIR notice for the City of Redondo's General Plan update. The description suggests some of the changes will eventually be applied to the LCP. C you share the draft General Plan updates (or the draft EIR, if the updates aren't ready to be shared)? We'd appreciate the opportunity for a quick preliminary look and discussion.

Thanks!
**Chloe Seifert | Coastal Program Analyst**
**CALIFORNIA COASTAL COMMISSION**
South Coast District Office
301 E. Ocean Blvd, Suite 300
Long Beach, CA 90802
(562) 590-5071

*Please note all Commission offices are open weekdays from 8am to 5pm, but public counter hours may be* ***limited to appointment only****. In addition to appointments in our offices, Commission staff is available by phone, email, and regular mail. Please make sure to send a copy of all correspondence or other documents electronically b email to the relevant Commission staff, in addition to the regular means required by regulations or statute. If you are not sure who to contact, please consult the Distric and Programs Contact list.*

*Please note that email correspondence with the City of Redondo Beach, along with attachments, may be subject to the California Public Records Act, and therefore may be subject to disclosure unless otherwise exempt. The City of Redondo Beach shall not be responsible for any claims, losses or damages resulting from the use of digital data that may be contained in this email.*

A1-1

# 2. Response to Comments

**A1. Response to Comments from the California Coastal Commission, dated August 7, 2024.**

A1-1 This comment confirms receipt of the notice for the DPEIR. The commenter requests to view the DPEIR and General Plan Update as they relate to changes in the Local Coastal Program. The City provided the commenter with the available links to the DPEIR, draft General Plan Update, and draft Local Coastal Program and Coastal Zoning ordinance amendments. This comment does not raise any environmental issue regarding the adequacy of the DPEIR; therefore, no further response is required pursuant to CEQA. The comment is acknowledged for the record.

LETTER A2 – Los Angeles County Airport Land Use Commission

**LOS ANGELES COUNTY AIRPORT LAND USE COMMISSION**

PAM O'CONNOR, Chair
DAVID W. LOUIE, Vice Chair
YOLANDA DUARTE-WHITE, Commissioner
ELVIN W. MOON, Commissioner
MICHAEL R. HASTINGS, Commissioner

August 15, 2024

City of Redondo Beach Community Development Department
ATTN: Marc Wiener, Community Development Director
415 Diamond Street
Redondo Beach, CA 90277

Comment Letter A2-1

**SUBJECT: Redondo Beach Focused General Plan Update, Zoning Ordinance Update and Local Coastal Program Amendment**

Dear Mr. Wiener:

Thank you for the opportunity to comment on the above referenced project. Staff of the Los Angeles County Airport Land Use Commission (ALUC) reviewed the submitted document and has the following comments.

The project is not located within an Airport Influence Area (AIA) of any airport in Los Angeles County. The nearest AIA is Torrance Municipal Airport, which is approximately 1.6 miles to the southeast. Therefore, the proposed project is not subject to ALUC review in accordance with Section 21676 of the California Public Utilities Code. There is no need for further review and staff has no additional comments on the project. A2-1

If you have any questions regarding this matter, please contact Lauren De La Cruz at (213) 974-6432 or via email at ldelacruz@planning.lacounty.gov, between 7:30 am and 5:30 PM, Monday through Thursday. Our office is closed on Fridays.

Sincerely,

DEPARTMENT OF REGIONAL PLANNING
Amy J. Bodek, AICP
Director

A. Bruce Durbin
Digitally signed by A. Bruce Durbin
Date: 2024.08.14 08:08:39 -07'00'

Bruce Durbin, Supervising Regional Planner
Ordinance Studies Section/ALUC Staff

LA COUNTY PLANNING

320 West Temple Street, Los Angeles, CA 90012 • 213-974-6411 • TDD: 213-617-2292
@LACDRP • planning.lacounty.gov

# 2. Response to Comments

**A2. Response to Comments from Los Angeles County Airport Land Use Commission, dated August, 15, 2024.**

A2-1 The commenter acknowledges the DPEIR and appreciates the opportunity to provide comments on the proposed project. The comment confirms that the proposed project is not within an Airport Influence Area of any airport in Los Angeles County and is not subject to review, which is consistent with the findings disclosed in the DPEIR. This comment does not raise any environmental issue regarding the adequacy of the DPEIR and the comment is acknowledged for the record.

LETTER A3 – California Geological Survey

California
Department of Conservation
California Geological Survey

Gavin Newsom, Governor
Gabe Tiffany, Acting Director

Comment Letter A3

September 6, 2024

Nick Graehl
California Geological Survey
715 P Street, MS 1901, Sacramento, CA 95814

To whom it may concern:

The California Geological Survey has reviewed the 2024 Draft Program Environmental Impact Report for Redondo Beach and has provided the following comments for your consideration. These comments are intended to offer insights and recommendations to ensure that the environmental impact assessment accurately reflects tsunami considerations pertinent to the project. Should you have any questions or require further clarification, do not hesitate to reach out. A3-1

1. Page 5.6-5 bullet Title 10 Chapter 5. 1542.
    a. Instead of an elevation datum (i.e., 15 feet MSL), consider having the applicant review the State Tsunami Hazard Area maps (https://www.conservation.ca.gov/cgs/tsunami/maps) and ASCE Tsunami Design Zone maps (https://asce7tsunami.online/) to identify their appropriate tsunami hazard.
2. Page 5.9-13 Chapter 5, Coastal Land Use Plan Implementing Ordinance
    a. Refer to comment 1a about using an elevation datum to define areas that require an application for development.

A3-2

3. Page 5.9-23 Figure 5.9-3 Tsunami Hazards Areas in Redondo Beach
    a. Confirm that the mapped tsunami area shown on this figure is the California Geological Survey's 2021 Tsunami Hazard Area Map for Los Angels County.
        i. State of California, 2021. Tsunami Hazard Area Map, Los Angeles County; produced by the California Geological Survey and the California Governor's Office of Emergency Services; dated 2021, displayed at multiple scales.
    b. If it is indeed the State of California (2021) map, then update the reference within the figure (California Geological Survey 2021).
    c. For clarification, the Tsunami Hazard Area maps are not inundation zones. They are intended for local jurisdictional, coastal evacuation planning uses only. They are not legal documents and do not meet disclosure requirements for real estate transactions nor for any other regulatory purpose. See the Tsunami Hazard Area

A3-3

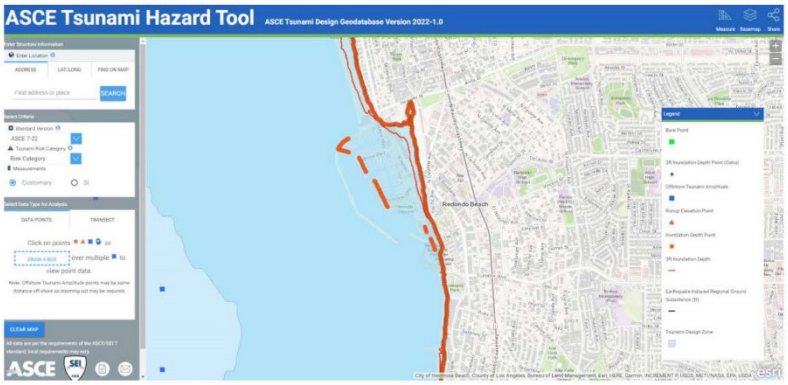
State of California Natural Resources Agency | Department of Conservation
Office of the State Geologist, 715 P Street, MS 1901, Sacramento, CA 95814
conservation.ca.gov | T: (916) 445-1825

# 2. Response to Comments

online metadata for additional information.
https://www.conservation.ca.gov/cgs/tsunami/maps

A3-3 Cont'

d. Consider including a Figure for the ASCE Tsunami Design Zones at Redondo Beach.

i. 


4. Page 5.9-25 Tsunami
   a. Consider using the term "Tsunami Hazard Area" to describe the tsunami area/maps, as these are not inundation maps. Refer to comment 3c for more information.
   b. Update reference to Tsunami Hazard Area Map for Los Angeles (see 3ai).
   c. Please refer to the following table for distant and local tsunami source information:

A3-4

## Tsunami Source Scenario Model Results for Los Angeles County

2019 UPDATE - Near shore tsunami heights (flow depths) for both local and distant source scenarios, in FEET above Mean Sea Level.
NOTE: The projections do not include any adjustments for ambient conditions, such as storm surge and tidal fluctuations, and model error (it is very important to note this difference, as those numbers can increase the projected water height during an event).

| | TSUNAMI SOURCES | Approximate Travel Time | Leo Carrillo State Beach | Malibu Beach/ Lagoon | Santa Monica Pier | Marina Del Rey | Manhattan Beach | Redondo Beach | Palos Verdes Hills | San Pedro-POLA | Long Beach Middle Harbor-POLB | Long Beach | Naples-Alamitos Bay | Catalina Avalon | Catalina Two Harbors |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Local Sources | M7 Newport Inglewood Fault | 10-15min | | | | | | | | 2 | 3 | 3 | 3 | | |
| | M7.5 Channel Isl. Thrust Fault | 10-15min | 4 | | 3 | 2 | 3 | 3 | 3 | | | | | | |
| | M7.2 Anacapa Dume Thrust Fault | 10-15min | | 8 | 6 | 3 | 6 | 6 | 5 | | | | | | |
| | Palos Verdes Landslide 1 | 10-15min | | | 7 | 4 | 6 | 10 | 20 | 4 | 4 | 4 | 5 | | |
| | Palos Verdes Landslide 2 | 10-15min | | | | | | | | 6 | 5 | 5 | 5 | 12 | 16 |
| | M7.1 Santa Monica Thrust Fault | 10-15min | | 4 | 5 | 3 | 3 | 4 | 3 | | | | | | |
| | M7.7 Catalina Fault | 15-20min | 4 | 6 | 6 | 5 | 6 | 6 | 6 | 5 | 7 | 7 | 7 | 27 | 10 |
| Distant Sources | M9 Cascadia-full rupture | 2hr | | | 4 | 4 | 4 | 4 | 3 | 3 | 4 | 4 | 4 | 3 | 3 |
| | M9.2 Alaska 1964 EQ | 6hr | 5 | 5 | 7 | 6 | 5 | 4 | 4 | 8 | 7 | 9 | 8 | 4 | 4 |
| | M9.3 Alaska-Fast Aleutians | 6hr | 7 | 8 | 14 | 14 | 9 | 8 | 7 | 9 | 8 | 12 | 13 | - | - |
| | M8.9 Central Aleutians I | 6hr | 3 | | 5 | 5 | 4 | 4 | 4 | 4 | 5 | 5 | 4 | | |
| | M8.9 Central Aleutians II | 6hr | | | 3 | 4 | 3 | 4 | 3 | 3 | 3 | 4 | 4 | | |
| | M9.2 Central Aleutians III | 6hr | 6 | 7 | 10 | 10 | 7 | 6 | 5 | 13 | 10 | 11 | 13 | 5 | 5 |
| | M9 Kamchatka 1952 EQ | 9hr | 3 | | | | | | | | | | | | |
| | M8.8 Kurill Islands II | 10hr | | | 3 | 2 | 3 | 2 | 2 | 2 | 3 | 3 | 3 | | |
| | M8.8 Kurill Islands III | 10hr | | | 3 | 3 | 3 | 3 | 2 | 2 | 3 | 3 | 3 | | |
| | M8.8 Kurill Islands IV | 10hr | | | 3 | 3 | 3 | 3 | 2 | 2 | 3 | 3 | 3 | | |
| | M8.8 Japan II | 11hr | | | 3 | 3 | 3 | 3 | 2 | 2 | 3 | 3 | 3 | | |
| | M9.5 Chile 1960 EQ | 13hr | | | 5 | 5 | 4 | 4 | 4 | 4 | 7 | 9 | 10 | 3 | 3 |
| | M9.4 Chile North | 13hr | 5 | 5 | 5 | 6 | 5 | 5 | 5 | 4 | 10 | 9 | 11 | 4 | 5 |
| | **Maximum Runup - Local Source** | | **4** | **9** | **8** | **5** | **7** | **11** | **24** | **7** | **8** | **8** | **8** | **30** | **18** |
| | **Maximum Runup - Distant Source** | | **7** | **9** | **11** | **11** | **8** | **7** | **5** | **15** | **12** | **13** | **15** | **7** | **7** |
| | **UPDATED Maximum Runup - Distant Source** | | **8** | **9** | **15** | **15** | **10** | **9** | **9** | **10** | **10** | **14** | **15** | - | - |

2019 Updated Source Information

A3-4 Cont'

d.
e. Please update distant/local source text in this section to align with this table.
f. Consider adding a section here on ASCE Chapter 6 standards, as they are used in the CBC for specific risk category structures.

A3-5

5. Page 5.9-26 Seiche
   a. Consider that seiche may occur within King Harbor.
6. Page 5.9-40 Pollutant Release from Dam Inundation, Tsunamis, and Seiches
   a. See comment 4a on "Tsunami Hazard Area".
   b. CGS has completed Probabilistic Tsunami Hazard Analyses (PTHA) at several return periods (i.e., 72, 100, 200, 475, 975, 2475, 3000-year average return periods) found online here: https://www.conservation.ca.gov/cgs/tsunami/reports#other

### Other Reports and Data

**Community exposure to tsunami hazards in California (PDF)** - Wood, N., Ratliff, J., and Peters, J., 2013, U.S. Geological Survey Scientific Investigations Report 2012-5222, 49 p.

**Probabilistic tsunami hazard analysis (PTHA) data for California (2023 release)** - This dataset represents the modeled tsunami flood hazard for California, originating from tsunami sources located in the Pacific Ocean, and covers a range of average return periods. For more information, please see the **PTHA data "Read Me" file** and the **AECOM report, *Probabilistic Tsunami Hazard Maps for the State of California (Phase 2)***.

⚠ THESE DATA ARE CONSIDERED "UNVERIFIED" WITH UNKNOWN ERRORS. Where errors exist, they are likely related to inaccuracies within the digital elevation model used during the numerical tsunami modeling process.

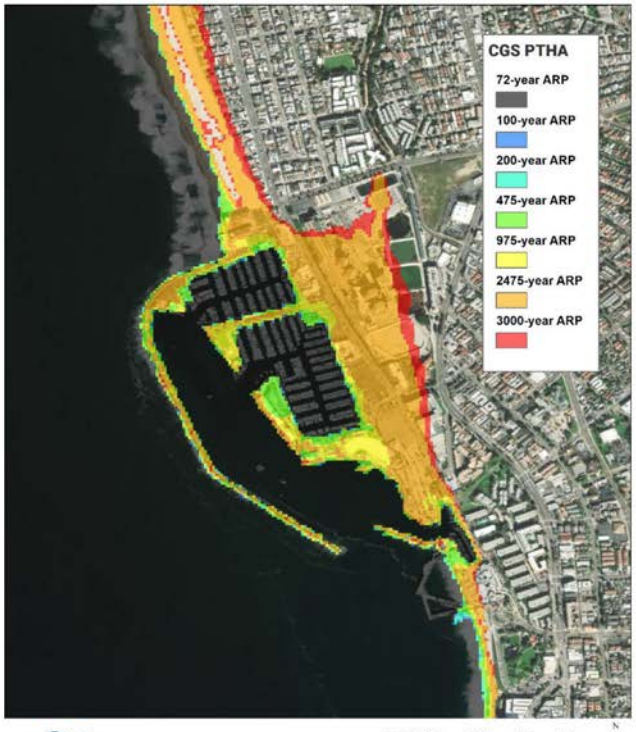
⚠ DO NOT USE THESE DATA FOR TSUNAMI EVACUATION PLANNING. Tsunami Hazard Area maps for evacuation planning are available at the **California Tsunami Maps web page**.

A3-6

c.
d. The PTHA data can be used to assess the impact of tsunami at Redondo Beach at each return period.

Page 3 of 5

# 2. Response to Comments




**Redondo Beach Tsunami Hazard Levels**

e.
f. The National Tsunami Warning Center (NTWC) provides tsunami alert information to the public. NTWC does not provide information on evacuation orders/warnings; that is done by local officials. Consider modifying text to clarify the difference.

7. Page 5.9-43 References
   a. Update tsunami map reference (see comment 3ai).
   b. Consider adding a reference to the ASCE Chapter 6 tsunami standards and online ASCE Tsunami Hazard Tool (https://asce7tsunami.online/)
8. Page 5.9-44 References

   Los Angeles County Office of Emergency Management (LACOES). 2006, March 29. Los Angeles County Operational Area Emergency Response Plan, Tsunami Annex. https://ceo.lacounty.gov/wp-content/uploads/OEM/Tsunami%20Annex.pdf

   a.
   b. Consider using a newer LA County Office of EM's OA Emergency Response Plan Tsunami annex, *if available*. The 2006 Tsunami Annex predates both of our CGS 2021 Tsunami Hazard Area maps and 2009 Tsunami Inundation Maps.
9. Page 13-3 Reference

A3-6 Cont'

A3-7

A3-8

A3-9

Page 4 of 5

California Department of Conservation (CDOC). 2009. Los Angeles County Tsunami Inundation Maps. https://www.conservation.ca.gov/cgs/tsunami/maps/los-angeles.

a.
b. Update reference (see comment 3ai)

A3-9 Cont'

Very respectfully,

**Nick Graehl**
Engineering Geologist | Tsunami Unit
**California Geological Survey**
715 P St, MS-1901 Sacramento, CA 95814
M: (661) 549-7788 W: (916) 879-1850
Nicholas.Graehl@conservation.ca.gov
State Tsunami Info: www.tsunami.ca.gov

# 2. Response to Comments

**A3. Response to Comments from California Geological Survey, dated September, 6, 2024.**

A3-1 This comment introduces a comment letter submitted by the California Geological Survey (CGS) that provides recommendations regarding tsunami considerations associated with the proposed project. Responses to these topics are provided below. This specific comment does not raise any environmental issue regarding the adequacy of the DPEIR; therefore, a response is not required pursuant to CEQA. However, the comment is acknowledged for the record and comments on tsunami considerations are further discussed below.

A3-2 This comment points to the regulatory background of Section 5.6, *Geology and Soils*, of the DPEIR, and recommends that future applicants of development projects facilitated by the proposed project also review the State Tsunami Hazard Area Maps and ASCE Tsunami Design zone maps in addition to Title 10, Chapter 5.1542, of the City's Municipal Code. The information presented is acknowledged for the record, and additional references regarding the State Tsunami Hazard Area maps and ASCE Tsunami Design Zone maps have been added as part of the FPEIR (see Section 3, *Revisions to the Draft PEIR*). The proposed project is a regulatory document that sets the framework for future growth and development in the city but does not directly result in development. Future development would be required to undergo the necessary approvals and would undergo individual project-level analysis under CEQA as appropriate. The addition of this source does not change the conclusions reached by the DPEIR.

A3-3 This comment requests clarification for the reference used in Figure 5.9-3, Tsunami Hazards Areas in Redondo Beach. The reference to CGS 2009 for the Figure 5.9-3 in the DPEIR has been corrected in the FPEIR to reference the CGS 2021 source for identifying Tsunami Hazard Zones (see Section 3, *Revisions to the Draft PEIR*). The correction of the source does not change the conclusions reached by the DPEIR. The commenter provides links to maps and data to prepare the recommended map to be included in the DPEIR. The commenter also recommends including a figure for the ASCE Tsunami Design Zones at Redondo Beach. An additional figure for the ASCE Tsunami Design Zones at Redondo Beach has been added as part of the FPEIR (see Section 3, *Revisions to the Draft PEIR*). No additional environmental issues were raised regarding the adequacy of the DPEIR. Therefore, no further response is warranted.

A3-4 This comment recommends using the term "Tsunami Hazard Area" instead of inundation to describe the tsunami area/maps. The comment also requests that the distant/local source text align with the table provided in the comment letter. The comment also suggests that a section on ASCE Chapter 6 standards be added in Section 5.9, *Hydrology and Water Quality*. ASCE Chapter 6 standards cover the design of buildings and other structures to withstand tsunami loads and effects. The General Plan Policy S-7.7 would require structures along the coast to be fortified against waves from a storm surge. Please see Section 3, *Revisions to the Draft PEIR,* for revisions made in response to this comment. The addition of this source does not change the conclusions reached by the DPEIR.

A3-5 This comment recommends considering that a seiche may occur in King Harbor. As discussed on page 5.9-40 of the DPEIR, King Harbor is in a tsunami hazard zone, and the city may be subject to impacts from seiches. The policies and regulations that reduce risks associated with tsunamis would also reduce risks from seiches. Therefore, the DPEIR contains sufficient analysis and no changes are necessary. The comment is acknowledged for the record.

A3-6 This comment provides a link for Probabilistic Tsunami Hazard Analysis (PHTA) that can be used to assess the impact of tsunamis. The comment also suggests that the text referring to the National Tsunami Warning Center (NTWC) be modified to make it clear that the NTWC does not provide information on evacuation orders/warnings. General Plan Policy S-5.2 would obtain information from the U.S. Tsunami Warning System and the Tsunami Ready Communities program to send evacuation notices to community members in the event of a tsunami. Additionally, the DPEIR references the National Weather Service rather than the NTWC. Therefore, the DPEIR provides accurate information regarding tsunami alert systems. No changes to the DPEIR are necessary. The comment is acknowledged for the record.

A3-7 This comment requests that the Tsunami map reference for Figure 5.9-3 be updated in the References section and recommends adding ASCE Chapter 6 tsunami standards and online ASCE Tsunami Hazard Tool. Please see Response to Comment A3-3, above, and Section 3, *Revisions to the Draft PEIR,* for revisions made to references as a response to this comment. The correction of the source does not change the conclusions reached by the DPEIR. The comment is acknowledged for the record.

A3-8 This comment suggests using a newer version of the Los Angeles County Office of Emergency Response Plan, Tsunami Annex, if available, rather than the reference cited in the DPEIR from 2006. The most recent version available is from 2018. Please see Section 3, *Revisions to the Draft PEIR,* for revisions made to references in response to this comment. The correction of the source does not change the conclusions reached by the DPEIR.

A3-9 This comment requests that the reference to the California Department of Conservation on DPEIR page 13-3 be updated to be consistent with the reference discussed in comment A3-3. Please see Section 3, *Revisions to the Draft PEIR,* for revisions made to references as a response to this comment. The correction of the source does not change the conclusions reached by the DPEIR.

# 2. Response to Comments

Letter A4 – Beach Cities Health District

Comment Letter A4

Beach Cities Health District
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September 11, 2024

**VIA E-MAIL AND**

**MESSENGER**

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

Email: GeneralPlanEIR@redondo.org

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

Dear Mr. Wiener and Mr. Scully:

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

Initially, BCHD feels compelled to observe the volume and purported scope of the DPEIR – encompassing a main volume in excess of 700 pages, and nine appendices over 700 pages.[1] An extension of the review and comment period – currently set at nearly the bare minimum number of days – is warranted to facilitate a thorough, comprehensive, and meaningful reading and evaluation of the materials. A4-1

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

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

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

A4-1 Cont'

**I. INTRODUCTION**

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

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

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

A4-2

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

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

(2) In a separate section:

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

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

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

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(4) Alternatives to the proposed project.

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

Article 9 of the CEQA Guidelines further expands on the contents of Draft EIRs. Specifically, a Draft EIR must contain the information required by CEQA Guidelines sections 15122 through 15131. (CEQA Guidelines § 15120.) Those sections require, among others, adequate consideration and discussion of (1) the Project Description, (2) the Environmental Setting, (3) Significant Environmental Impacts, (4) Mitigation Measures, (5) Alternatives, and (6) Cumulative Impacts. A4-2 Cont'

As outlined in more detail below, the DPEIR fails to, among others: contain an adequate project description; properly identify the environmental setting; adequately assess the Project's potentially significant environmental effects, including those that cannot be avoided; and identify feasible mitigation measures and alternatives to avoid or substantially lessen the Project's significant environmental effects. It is therefore respectfully urged that the DPEIR be revised, corrected, and recirculated for public review and comment before the City proceeds with any further action on the proposed Project. A4-3

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

**II. THE DPEIR FAILS TO COMPLY WITH CEQA.**

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

**1. Deficient Project Description—In General**

The DPEIR does not provide a full and accurate description of the "Project" as required by CEQA. (*See, e.g.*, CEQA Guidelines § 15124; *Laurel Heights Improvement Ass'n v. Regents of the University of California* (1988) 47 Cal.3d 376.) This deficiency undermines the document's compliance with CEQA guidelines and its effectiveness in informing the public and decision-makers about the potential environmental impacts of the Project. A4-4

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

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

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

A4-4 Cont'

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

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

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

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

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

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

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

A4-4 Cont'

**2. Specific Comments on "Project Description" Text**

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

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

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

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

A4-5

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

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

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

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

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

A4-5
Cont'

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

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

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

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

A4-5 Cont'

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

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

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

A4-6

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

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

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

A4-6 Con't

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

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

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

A4-7

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

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

A4-7
Con't

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

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

[7] A copy of the Campus' Seismic Risk Consulting Report is enclosed as Attachment 1.
[8] A copy of the Bain Brothers feasibility report regarding a seismic retrofit is enclosed as Attachment 2.
[9] In fact, it appears that the proposed 0.75 FAR was advanced for the sole and specific purpose of defeating the proposed modernization of the Campus.

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

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

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

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

A4-8

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

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

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

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

A4-8 Cont'

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

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

A4-9

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

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

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

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

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

A4-9
Cont'

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

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

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

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

A4-9 Cont'

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

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

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

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

A4-10

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

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

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

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

A4-10
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- **Policy LU-4.7: Health Partnerships**. This policy states that the City should "Build and maintain partnerships with health care providers, health-promoting non-profits, and community-based organizations to evaluate and implement land use projects in a manner that improves community health." (Draft General Plan Update, p. 2-21).[12] The Campus reflects this policy by partnering with BCHD, a public agency that provides a wide range of preventive health services to South Bay residents, including those in the City. The proposed FAR of 0.75 would eliminate the Campus' ability to efficiently connect City residents with health and wellness services, programs, and facilities. By imposing this restrictive FAR, the City is essentially dismantling and disregarding its partnership with BCHD, jeopardizing the goal of promoting health in the City and leading to a significant loss of essential health facilities and services for Beach City residents.

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

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

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

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

A4-10 Cont'

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

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

A4-11

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

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

A4-12

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

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

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

A4-12 Cont'

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

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

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

A4-13

**III. CONCLUSION**

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

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

A4-14

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Very truly yours,

BEACH CITIES HEALTH DISTRICT

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**A4. Response to Comments from the Beach Cities Health District, dated September 11, 2024.**

A4-1 This comment introduces the Beach Cities Health District (BCHD) as a public agency that provides preventive health services to residents of the South Bay, including the City of Redondo Beach. The commenter raises concerns regarding the public review period and states that the amount of time to review the DPEIR was not sufficient considering the DPEIR is over 700 pages long, as are the appendices. The commenter requests an extension of the review and comment period to thoroughly review a document of this volume. Under CEQA Guidelines Section 15105, a minimum 45 day public review period for a draft Environmental Impact Report is required is it is submitted to the State Clearinghouse for review by state agencies, extensions of the review period occur under . unusual circumstances. Unusual circumstances are at the discretion of the lead agency and are not warranted at this time. The public review period for the DPEIR was 47 days, meeting the requirements under CEQA. Additionally, the commenter raises concerns regarding the DPEIR and how it fails to meet the requirements of CEQA and requests the recirculation of the DPEIR. As further discussed in the responses provided below, no further analysis is required and recirculation of the DPEIR is not warranted. Please refer to the comments below that address these comments in greater detail.

A4-2 This comment further introduces the concerns raised in this letter. The comment outlines the necessary contents of a Draft EIR pursuant to CEQA Guidelines, which include (1) the Project Description, (2) the Environmental Setting, (3) Significant Environmental Impacts, (4) Mitigation Measures, (5) Alternatives, and (6) Cumulative Impacts. As discussed in DPEIR section 1.2.2, *Type and Purpose of this Draft PEIR*, a Program EIR was prepared for the proposed project in accordance with CEQA Guidelines, Section 15168, and includes all of these components. No environmental issues were raised in this comment regarding the adequacy of the DPEIR and no further analysis is warranted.

A4-3 This comment states the DPEIR fails to contain an adequate project description, properly identify the environmental setting, adequately assess the proposed project's potentially significant environmental effects, and identify feasible mitigation measures and alternatives to avoid or lessen significant environmental impacts. Issues raised in this comment are addressed in detail in comments A4-4 through A4-13. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

A4-4 This comment states the DPEIR does not provide a full and accurate description of the proposed project. The commenter also expresses concerns regarding the opportunity to provide comments on modifications of the proposed project after the public review period. As discussed in DPEIR Section 3, *Project Description*, California state law requires each city and county to adopt a comprehensive, long-term general plan. Consistent with this requirement, the City is updating five of the State-required elements that make up the City of Redondo Beach General Plan. Updates to these elements are accompanied by associated revisions to the City's Zoning Ordinances and Local Coastal Program (LCP). The project description of the DPEIR contains accurate and detailed information

explicitly describing all the components of the proposed project, including summaries of the general plan element updates, the zoning updates, the updates to the City's LCP, and the City's objectives. Multiple Tables and Figures are included in the project description to further illustrate and clarify the scope of the project.

Additionally, revisions proposed by the Planning Commission are recommendations only and not formal changes to the project being proposed and analyzed. Proposed changes discussed by the Planning Commission are within the scope of the EIR. Additionally, revisions often occur in response to the comments and concerns received during the public review period. However, changes that do not significantly change the analysis of the DPEIR would not result in recirculation. Therefore, no revisions are necessary. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

A4-5 This comment raises concerns regarding inconsistencies in floor area ratio (FAR) application and inadequate General Plan buildout. As discussed on Page 3-25 of the DPEIR, the Public Institutional (PI) land use designation was analyzed for reasonable growth by 2050 at a FAR consistent with the proposed land use designation, existing conditions, and known projects with application and/or certified EIR at the time of release of the Notice of Preparation. Specifically, growth for BCHD was projected consistently with the site development plan/program for phases 1 and 2, as described in the project description of the 2021 certified final environmental impact report in the Table titled "Proposed Project at a Glance" on page 2-1 of that documents Project Description section (SCH No. 2019060258 ) in the buildout methodology for the General Plan Update (see Appendix B, *Buildout Methodology*, of the DPEIR). When considering buildout conditions, the need for new public and institutional development building space is often minimal in a built out city, even when new residential and nonresidential growth is forecast throughout the balance of the city. Often, the incremental increased need for public services is accommodated within existing building and property footprints. While some facilities may get redesigned and rebuilt (due to aging of infrastructure or buildings), the average intensity of building space for public and institutional development is primarily driven by the intensity of existing facilities, almost all of which are currently far below (less than half) of the maximum allowable FAR. The BCHD is an existing non-conforming use that currently exceeds (by 0.02) the maximum FAR of 0.75; however, the buildout assumes 0.85 FAR to align with the proposed development plan/program in the property's proposed Healthy Living Campus Master Plan FEIR. The General Plan and Zoning Ordinance currently do not place a cap on the FAR for most of the PI zones, with the exception of City Hall and the Annex located on the northeast corner of PCH and Vincent Street, which have a FAR of 1.25. Under the proposed project, the maximum FAR for the PI land use designation would remain at 1.25 for the City Hall and the Annex and be designated at0.75 for all other PI designated properties. Moreover, in contrast with commercial and industrial uses, the shape and size of public and institutional uses are subject to different market forces and are less predictably driven by the maximum

development intensity allowed. Changes to the land use designation, including the PI land use, are consistent with the General Plan buildout; therefore, the DPEIR contains sufficient analysis at a program level and no changes are necessary.

A4-6 This comment states that the DPEIR fails to acknowledge and analyze various significant environmental impacts due to improper buildout methodology. As discussed in comment A4-5, changes to land use designation in the DPEIR are consistent with General Plan Update buildout since there are several areas within the PI land use category where change is not anticipated and because the City is built out, the proposed plan anticipates that any increase in services within this land use category would be accommodated on existing sites and within existing building footprints. Additionally, a maximum FAR was added to comply with State Law requiring cities to establish standards of population density and building intensity. Additionally, the proposed project is a regulatory document that sets the framework for future growth and development in the city and does not directly result in development. At the general plan level, it is speculative and infeasible to evaluate project-specific environmental impacts associated with specific construction of development since specific sites and time frames for development are unknown. When specific projects are necessary to meet the growth demand from buildout, the appropriate level of analysis required under CEQA would be conducted.

A4-7 This comment states that the DPEIR fails to evaluate impacts to public health services. Impacts to public services, including fire, police, school and library facilities, are addressed in Section 5.13 of the DPEIR. The CEQA Guidelines do not require analysis of a project's potential impacts upon public health services; CEQA is focused on potential impacts to the physical environment. The proposed project is a regulatory document that sets the framework for future growth and development in the city and does not directly result in development. At the general plan level, it is speculative and infeasible to evaluate project-specific environmental impacts associated with specific construction of projects since specific sites and time frames for development are unknown. There are no pending applications, including from BCHD, related to these PI sites. This DPEIR fulfills the requirements for a Program EIR. Once a Program EIR has been prepared, subsequent activities within the program must be evaluated to determine whether an additional CEQA document is necessary. Use of a Program EIR gives the lead agency an opportunity to consider broad policy alternatives and program wide mitigation measures, as well as greater flexibility to address project-specific and cumulative environmental impacts on a comprehensive scale. When specific projects are necessary to meet the growth demand from buildout, the appropriate level of analysis required under CEQA would be conducted.

A4-8 This comment states that the DPEIR fails to effectively evaluate impacts on housing and population, specifically related to assisted living options. The comment raises concerns regarding land use changes associated with PI designations and states that the proposed FAR will result in a significant loss of essential housing for the elderly and disabled. Concerns raised regarding proposed FAR are addressed in comment A4-5, above.

Buildout of the proposed project is not linked to a development timeline and is based on a reasonable buildout of the parcels in the city, nor would proposed land use changes change existing uses on site. No limitations on overall operation of the campus would be placed as a result of the proposed project. As noted in this DPEIR, Appendix B, *Buildout Methodology*, assisted living units, have aspects of both residential and non-residential uses, but they must be analyzed as either a residential use or a non-residential use in the technical studies of the PEIR to avoid double-counting associated impacts. The DPEIR conservatively analyzed all assisted living facilities in the City as residential uses. Where FARs for facilities with assisted living are identified, however, the FAR includes the building square footage associated with the assisted living facility. Additionally, the proposed project is a regulatory document that sets the framework for future growth and development in the city and does not directly result in development. Lastly, the City of Redondo Beach General Plan contains a Senior Citizen/Childcare Services Element that is designed to address the needs and preferences of the senior population; no changes to this element are proposed for updates as part of this effort.

A4-9 This comment states that the DPEIR fails to analyze environmental justice impacts. Environmental justice is not a topic under CEQA. Furthermore, there are no environmental justice communities in the City of Redondo Beach. However environmental justice may be indirectly addressed under the topic of housing and population, which involves ensuring that the environmental impacts of a proposed project do not displace communities. As discussed in DPEIR Section 5.12, *Population and Housing*, the proposed project would increase opportunities for housing, provide a variety of housing types, and exceed the RHNA goal for new housing units. Therefore, the proposed project would not displace housing. Additionally, there are no environmental justice communities in the city. The proposed project is a regulatory document that sets the framework for future growth and development in the city and does not directly result in development. The proposed project was analyzed at the program-level and would not eliminate any existing improvements or housing. The proposed project would also result in an increase in employment by 16% above existing conditions (see page 5.10-6 of the DPEIR). The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

A4-10 This comment states that the DPEIR fails to recognize and analyze inconsistencies between General Plan Update Land Use Policies and proposed maximum density for land use designations, including FAR. Concerns raised regarding proposed FAR are addressed in comment A4-5. As discussed in comment A4-5, changes to land use designation in the DPEIR are consistent with the General Plan Update buildout since there are several areas within the PI land use category where change is not anticipated and because the City is built out, the proposed plan anticipates that any increase in services within this land use category would be accommodated on existing sites and within existing building footprints. Additionally, a maximum FAR was added to comply with State Law requiring cities to establish standards of population density and building intensity. Existing uses in the PI

land use category where the FAR in the proposed plan has been set to 0.75 include: 12 public schools, 1 private school, 2 fire stations, a water storage facility and adjacent open space area, the City Yard, the parking lot in Riviera Village, the North Redondo Beach Library, the Kensington Assisted Living Community (developed on school property), and Beach Cities Health District. As discussed in Section 5.10, *Land Use and Planning*, a primary goal of the proposed project is to retain the City's current character, and several policies of the proposed project address consistency of new development with existing development. Additionally, as discussed previously, the proposed project exceeds the RHNA goal for new housing units and would increase opportunities for housing. However, this comment does not raise any environmental concerns regarding the adequacy of the DPEIR analysis, therefore no revisions to the DPEIR are necessary. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

A4-11 This comment states that the DPEIR fails to analyze feasible alternatives. DPEIR Chapter 6, *Alternatives to the Project*, includes a reasonable range of feasible alternatives to the project that meet the defined basic objective of the project but avoid or substantially lessen identified significant environmental impacts, as defined in CEQA Guidelines Section 15123.6(a). Additional alternatives to the project were considered but rejected, as detailed in Chapter 6 of the DPEIR. Additionally, the DPEIR does not need to address all possible alternatives and there are no additional impacts that the DPEIR has not disclosed. Therefore there is no need for additional alternatives to address concerns raised in this letter.

A4-12 This comment states that the BCHD was not given adequate opportunity to be involved in the preparation of the General Plan Update. The BCHD met with members of the General Plan Advisory Committee (GPAC) as well as presented on the topic of "Blue Zones" in September of 2018. This meeting agenda included as the priority task to discuss and reach consensus on Draft Land Use definitions. BCHD was also notified of preparation of the DPEIR during the EIR scoping process. BCHD was sent a Notice of Preparation (NOP) via certified mail on June 1, 2023. A representative on behalf of BCHD, from the law firm Rutan & Tucker LLP, attended the EIR scoping meeting on June 8, 2023. At the scoping meeting, BCHD stated its concern related to the proposed 0.75 FAR for the PI land use designation. Following the scoping meeting, BCHD submitted a comment letter (dated June 26, 2023) reiterating its concerns associated with the proposed 0.75 FAR for PI land use designation (see Appendix A*, Notice of Preparation and Public Comment Letters*, of the DPEIR). BCHD was sent via certified mail a Notice of Availability (NOA) of the release of the DPEIR on August 1, 2024, notifying BCHD of the 47-day review period. As discussed above under Response to Comment A4-5, and on Page 3-25 of the DPEIR, the Public Institutional (PI) land use designation analyzed reasonable growth by 2050 at a FAR consistent with the proposed land use designation, existing conditions, and known projects with application and/or certified EIR at the time of release of the Notice of Preparation. Specifically, growth for BCHD was projected

consistently with the site development plan/program for phases 1 and 2, as described in the project description of the 2021 certified final environmental impact report in the Table titled "Proposed Project at a Glance" on page 2-1 of that documents Project Description section (SCH No. 2019060258 ), in the buildout methodology for the General Plan Update (see Appendix B, *Buildout Methodology*, of the DPEIR). As BCHD was involved with the City's General Plan Advisory Committee as early as 2018 and as proper noticing for the DPEIR was completed pursuant to the CEQA Guidelines and the buildout methodology associated with the PI land use accounted for known projects at the time of the preparation of the NOP, no revisions to the DPEIR are necessary. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

A4-13 This comment requests recirculation of the DPEIR as a result of the issues raised in this letter. Recirculation of a DPEIR under CEQA is required for significant changes to the project after the Draft EIR is released that may result in new or increased significant environmental impacts; for new information that was not available during the initial review period and could affect conclusions in the Draft EIR; for revisions that affect impact analysis; or if numerous public comments reveal significant issues not previously addressed that would lead to new environmental impacts. The DPEIR accurately analyzes impacts on a program-level. Section 1.2.2, *Type and Purpose of this Draft PEIR*, page 1-3, lays out the requirements of the CEQA Guidelines and why a program-level EIR is the appropriate level of CEQA review to support the proposed project. The proposed project is a regulatory document that sets the framework for future growth and development in the city and does not directly result in development. Therefore, this section of the DPEIR accurately describes the processes that the City must take to ensure CEQA compliance for any future projects that may be facilitated by the proposed project. No further analysis is required and recirculation of the DPEIR is not warranted.

A4-14 This comment concludes and summarizes the letter written by the BCHD. Please see the responses provided above that address each of the issues outlined in this comment. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

A4 Attachment 1

The letter includes a Seismic Risk Consulting Report. This attachment does not warrant changes under CEQA. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration. (See Appendix A of this FPEIR.)

A4 Attachment 2

This letter includes a report: Evaluation of Development Strategy: Seismic Retrofitting. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration. (See Appendix A of this FPEIR.)

A4 Attachments 3 and 4

This letter includes resolutions and administrative reports for the Planning Commission Hearings. These attachments do not warrant changes under CEQA. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration. (See Appendix A of this FPEIR.)

# 2. Response to Comments

## LETTER A5 – Los Angeles County Metropolitan Transportation Authority

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

Metro

Comment Letter A5

September 16, 2024

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

Sent by Email: GeneralPlanEIR@redondo.org

RE: Redondo Beach Focused General Plan Update
Amended Notice of Availability of Environmental Impact Report (EIR)

Dear Director Wiener and Mr. Scully:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed Redondo Beach Focused General Plan Update, Zoning Ordinance Update and Local Coastal Program Amendment (Plan Update) located in the City of Redondo Beach (City). Metro's mission is to provide a world-class transportation system that enhances quality of life for all who live, work, and play within Los Angeles County. As the County's mass transportation planner, builder and operator, Metro is constantly working to deliver a regional system that supports increased transportation options and associated benefits, such as improved mobility options, air quality, health and safety, and access to opportunities. A5-1

Per Metro's area of statutory responsibility pursuant to sections 15082(b) and 15086(a) of the Guidelines for Implementation of the California Environmental Quality Act (CEQA: Cal. Code of Regulations, Title 14, Ch. 3), the purpose of this letter is to provide the City with specific detail on the scope and content of environmental information that should be included in the Environmental Impact Report (EIR) for the Project. Effects of a project on transit systems and infrastructure are within the scope of transportation impacts to be evaluated under CEQA.[1]

**Plan Update Description**

The Plan Update effort focuses on updating four (4) elements (Land Use, Open Space and Conservation, Safety, and Noise) that were last updated in 1992. These four elements will combine with elements that are not being updated to compose the City's comprehensive General Plan. A5-2

[1] See CEQA Guidelines section 15064.3(a); Governor's Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts In CEQA, December 2018, p. 19.

Page 1 of 4

Redondo Beach Focused GPU Notice of Availability
Notice of Availability – Metro Comments
September 16, 2024

The focused update also includes a new Introduction, which includes a vision statement (Vision 2050), Guiding Principles developed as part of the process by the City's General Plan Advisory Committee (GPAC), growth projections by 2050, and implementation actions.

A5-2 Cont'

**Comments**

*Transit Services and Facilities*

The Plan Update and associated EIR should include updated information on existing and planned transit services and facilities within the Plan Update area. In particular, Metro's NextGen Bus Plan (completed in December 2021) should be used as a resource to determine the location of high-frequency bus services and stops within the Plan Update area. For more information, visit the NextGen Bus Plan's website at https://www.metro.net/projects/nextgen/. The most recent transit schedule and stop information is available at https://www.metro.net/riding/schedules-2/.
In addition, the Plan Update and EIR should include stations for all rail lines that are existing and under construction. Please refer to Metro's 2020 Long Range Transportation Plan and Measure M Expenditure Plan.

A5-3

*Adjacency to Planned Light Rail Facilities*

The Plan Update area includes the Metro-owned Right-of-Way (ROW) and planned light rail facilities for C Line Extension to Torrance. The project would extend transit service from the Redondo Beach (Marine) Station where it currently ends to the new Mary K. Giordano Regional Transit Center (Torrance Transit Center). Metro released a Draft EIR in January 2023. In May 2024, the Metro Board of Directors selected the Hybrid Alternative as the Locally Preferred Alternative (LPA), including a future station that would be located adjacent to the existing Redondo Beach Transit Center located on Kingsdale Avenue, and directed staff to continue the EIR process in compliance with CEQA; complete studies to respond fully to public comments received on the ROW and Hawthorne Blvd Alignments in the Final EIR; and continue to develop refined cost estimates for the LPA on the ROW alignment and develop a refined funding plan that includes the identification of all federal, State, and local funding sources to implement the project.

To avoid any confusion, the Plan Update and EIR should note that the correct name of the existing line is the C Line (Green). This is the official designation of the light rail used by Metro.

Metro recommends that the Plan Update consider appropriate and compatible uses along the rail corridor and development standards for new development projects adjacent to the planned light rail corridor to ensure safety and maintenance. See the Metro Adjacent Development Handbook for best practices (available at https://www.metro.net/devreview). Please contact Georgia Sheridan, Senior Director, for more information on the C Line Project, at sheridang@metro.net. The project website is at metro.net/clineext.

A5-4

Page 2 of 4

# 2. Response to Comments

Redondo Beach Focused GPU Notice of Availability
Notice of Availability – Metro Comments
September 16, 2024

**Transit Orientation Considerations**

Considering the Plan Update area's inclusion of the planned light rail, as well as several key bus lines, Metro would like to identify the potential synergies associated with transit-oriented development:

1. Land Use: Metro supports development of commercial and residential properties near transit stations and understands that increasing development near stations represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of developments. Metro encourages the City to be mindful of proposed developments in proximity to Metro Rail stations, including orienting pedestrian pathways towards the station.

2. Transit Connections and Access: Metro strongly encourages the City to install Project features that help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from the proposed development site and nearby destinations. The City should consider requiring the installation of such features as part of the Plan's development standards, including:

    a. Walkability: The provision of wide sidewalks, pedestrian lighting, a continuous canopy of shade trees, enhanced crosswalks with ADA-compliant curb ramps, and other amenities along all public street frontages of the development site to improve pedestrian safety and comfort to access Metro Rail stations and Metro Bus stops.

    b. Bicycle Use and Micromobility Devices: The provision of adequate short-term bicycle parking, such as ground-level bicycle racks, and secure, access-controlled, enclosed long-term bicycle parking for residents, employees, and guests. Bicycle parking facilities should be designed with best practices in mind, including highly visible siting, effective surveillance, ease to locate, and equipment installation with preferred spacing dimensions, so bicycle parking can be safely and conveniently accessed. Similar provisions for micro-mobility devices are also encouraged. The City should also coordinate with the Metro Bike Share program to explore potential Bike Share stations in the Plan Update area.

    c. First & Last Mile Access: The City should address first-last mile connections to transit and is encouraged to support these connections with wayfinding signage inclusive of all modes of transportation. For reference, please review the First Last Mile Strategic Plan, authored by Metro and the Southern California Association of Governments (SCAG), available on-line at: http://media.metro.net/docs/sustainability_path_design_guidelines.pdf.

3. Parking: Metro encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements and the exploration of shared parking opportunities. These strategies could be pursued to reduce automobile-orientation in design and travel demand.

A5-5

A5-6

A5-7

Page 3 of 4

Redondo Beach Focused GPU Notice of Availability
Notice of Availability – Metro Comments
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4. Wayfinding: Wayfinding signage should be considered as part of the Plan Update to help people navigate through the Plan Update area to all modes of transportation. Any temporary or permanent wayfinding signage with content referencing Metro services or featuring the Metro brand and/or associated graphics (such as Metro Bus or Rail pictograms) requires review and approval by Metro Signage and Environmental Graphic Design.

A5-8

Metro looks forward to continuing to collaborate with the City to effectuate policies and implementation activities that promote transit-oriented communities. If you have any questions regarding this letter, please contact me by phone at 213.418.3484, by email at DevReview@metro.net, or by mail at the following address:

Metro Development Review
One Gateway Plaza, MS 99-22-2
Los Angeles, CA 90012-2952

Sincerely,

Digitally signed by Shine Ling
DN: C=US, E=lingsx@metro.net, O=Los Angeles County Metropolitan Transportation Authority (Metro), OU=Transit Oriented Communities, CN=Shine Ling
Date: 2024.09.16 11:58:35-07'00'

Shine Ling, AICP
Senior Director, Development Review Team
Transit Oriented Communities

Attachments and links:

- Adjacent Development Handbook: https://www.metro.net/projects/devreview/

Page 4 of 4

**A5. Response to Comments from the Los Angeles County Metropolitan Transportation Authority, dated September 16, 2024.**

A5-1 The Los Angeles County Metropolitan Transportation Authority (Metro) has submitted a comment letter that provides transit systems and infrastructure information for consideration in the DPEIR. This comment does not raise concerns regarding the adequacy of the DPEIR, and the specific comments in this letter are further addressed below. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

A5-2 This comment summarizes the proposed project's efforts to update the General Plan, including a vision statement, guiding principles, implementation actions, and growth projections by 2050. This comment does not raise concerns regarding the adequacy of the DPEIR. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

A5-3 This comment suggests that Metro's NextGen Bus Plan be used as a resource to determine transit services and facilities in the planning area. The comment provides links for further information. As discussed on page 5.15-6 of the DPEIR, Metro's NextGen Bus Plan was incorporated into the description of transit routes in the planning area. This comment does not raise concerns regarding the adequacy of the DPEIR. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

A5-4 This comment provides background information for the planned light rail facilities and notes that the correct name for the existing line is the C Line (Green), which is the official designation of the light rail used by Metro, and that it should be referred to as such in the DPEIR. The comment also provides a link for the Metro Adjacent Development Handbook for best practices. Page 5.15-20 of the DPEIR discusses the Metro C Line (Green) accurately, consistent with the comments in Metro's letter. No changes to the DPEIR are necessary. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

A5-5 This comment shares Metro's support for development of commercial and residential properties near transit stations and encourages the City to be mindful of proposed development in proximity to Metro Rail stations, including orientation of pedestrian pathways. Goals and policies implemented by the proposed project would facilitate streetscape improvements, encourage pedestrian access for new development, support location of transit stations, and facilitate bicycling and pedestrian linkages (Policies LU 2.7, 2.8, 3.6, 3.8, and 4.6). This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

A5-6 This comment encourages the installation of safe and convenient connections for pedestrians, people riding bicycles, and transit uses. Goals and policies implemented by the proposed project would facilitate streetscape improvements, encourage pedestrian access for new development, support location of transit stations, and facilitate bicycling

and pedestrian linkages (Policies LU 2.7, 2.8, 3.6, 3.8, and 4.6). This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

A5-7 This comment encourages the incorporation of transit-oriented, pedestrian-oriented parking strategies. Parking requirements were adjusted as part of the proposed project to implement Housing Element Program 13 (see Table 3-7 on page 3-33 of the DPEIR). This comment does not raise concerns regarding the adequacy of the DPEIR. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

A5-8 This comment suggests that wayfinding signage be considered to help people navigate through the planning area to all modes of transportation. Policy P33 of the Transportation and Circulation Element would enhance transit wayfinding and signage at transit stops, which would remain consistent with the proposed Land Use Element policies (see page 5.15-8 of the DPEIR). This comment does not raise concerns regarding the adequacy of the DPEIR. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

# 2. Response to Comments

## LETTER O1 - Morongo Band of Mission Indians

TRIBAL HISTORIC PRESERVATION OFFICE

Comment Letter O1

VIA ELECTRONIC MAIL

GeneralPlanEIR@redondo.org

MORONGO BAND OF MISSION INDIANS
A SOVEREIGN NATION

Marc Wiener
City of Redondo Beach
415 Diamond Street
Redondo Beach, CA 90277

August 12, 2024

**Re: Notice of Availability Draft Environmental Impact Report Focused General Plan Update, City of Redondo Beach, California**

The Morongo Band of Mission Indians (Tribe/MBMI) Tribal Historic Preservation Office received your letter regarding the above referenced Project. The proposed Project is not located within the boundaries of the ancestral territory or traditional use area of the Cahuilla and Serrano people of the Morongo Band of Mission Indians.

Thank you for notifying the MBMI about this project. MBMI encourages your consultation with tribes more closely associated with the lands upon which the project is located.

O1-1

Respectfully,

Bernadette Ann Brierty

Bernadette Ann Brierty
**Tribal Historic Preservation Officer**
**Morongo Band of Mission Indians**

CC: Morongo THPO

12700 Pumarra Road – Banning, CA 92220 – (951) 755-5259 – Fax (951) 572-6004 – THPO@morongo-nsn.gov

**O1. Response to Morongo Band of Mission Indians, dated August 18, 2024.**

O1-1 The commenter acknowledges receipt of the Notice of Availability (NOA) for the DPEIR. The commenter confirms that the proposed project is not within the boundaries of the area of the Morongo Band of Mission Indians, and as such no consultation is requested. This comment does not raise any environmental issue regarding the adequacy of the DPEIR; therefore, a response is not required pursuant to CEQA. This comment is acknowledged for the record.

# 2. Response to Comments

## LETTER O2 – StopBCHD

Comment Letter O2

Outlook

**FYI - BCHD Unimpressive Health Outcomes**

**From** Stop BCHD <stop.bchd@gmail.com>
**Date** Fri 2024-09-20 1:21 AM
**To** Planredondo <Planredondo@redondo.org>; Planning Redondo <PlanningRedondo@redondo.org>; Sean Scully <Sean.Scully@redondo.org>; GeneralPlanEIR <GeneralPlanEIR@redondo.org>; Marc Wiener <Marc.Wiener@redondo.org>

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

O2-1

**LA County Health did a fair unbiased Health Survey in 2023 and published it this year. Of the 50 highest income Cities in the County, 19 were large enough to get valid survey results and they are below.**

(We used the odd Gallup ranking methodology for the "value" of health outcomes, since BCHD made Taxpayers fund it – likely as an ADVERTISEMENT for their Bond Measure)

**Manhattan Beach** (#6 City in income in LA County) was Top 25% in high income City health outcomes in the 2023 LA County Health Survey.

**Hermosa Beach** (#16 in income) was too small population for valid survey data.

**Redondo Beach** (#22 in income) was in the below average in health outcomes.

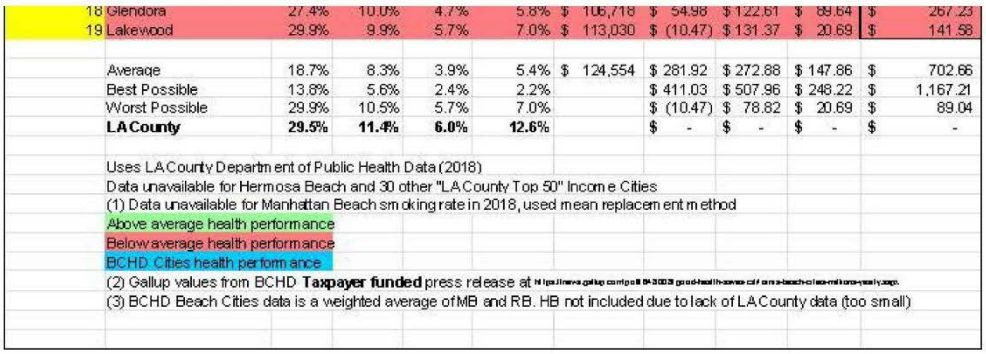
**BCHD's Beach Cities** (averaged together) were just slightly above "average" in health outcomes.

# REMEMBER – NO OTHER TOP 50 INCOME CITIES IN LA COUNTY HAVE A HEALTH DISTRICT – WHY ARE BCHD Beach Cities Health Outcomes ONLY AVERAGE?

| Gallup Methodology Health "Savings" Rating | | Obesity | Diabetes | Smoking | Uninsured | HH Income | Gallup per capita Obesity Value (2) | Gallup per capita Diabetes Value (2) | Gallup per capita Smoking Value (2) | Per Person "Savings" vs. LA County Average Health Performance |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | $ 2,618 | $ 8,758 | $ 6,895 | |
| 1 | Calabasas | 14.8% | 5.6% | 2.4% | 3.8% | $ 154,079 | $ 384.85 | $ 507.96 | $ 248.22 | $ 1,141.03 |
| 2 | Bev Hills | 14.1% | 5.6% | 2.9% | 6.2% | $ 116,771 | $ 403.17 | $ 507.96 | $ 213.75 | $ 1,124.88 |
| 3 | Santa Monica | 14.9% | 5.6% | 3.4% | 6.1% | $ 106,797 | $ 382.23 | $ 507.96 | $ 179.27 | $ 1,069.46 |
| 4 | **Manhattan Beach (1)** | 13.8% | 6.0% | 3.9% | 2.2% | $ 187,217 | $ 411.03 | $ 472.93 | *$ 144.80* | $ 1,028.75 |
| 5 | Rancho PV | 14.6% | 7.6% | 3.0% | 4.0% | $ 166,747 | $ 390.08 | $ 332.80 | $ 206.85 | $ 929.74 |
| 6 | Culver City | 18.3% | 6.1% | 4.0% | 5.3% | $ 114,429 | $ 293.22 | $ 464.17 | $ 137.90 | $ 895.29 |
| 7 | So. Pasadena | 15.0% | 8.3% | 2.6% | 5.4% | $ 127,882 | $ 379.61 | $ 271.50 | $ 234.43 | $ 885.54 |
| 8 | Claremont | 17.3% | 7.9% | 3.7% | 4.8% | $ 115,091 | $ 319.40 | $ 306.53 | $ 158.59 | $ 784.51 |
| | **BEACH CITIES (3)** | 16.7% | 7.3% | 4.8% | n/a | n/a | $ 336.29 | $ 362.46 | $ 80.71 | $ 779.46 |
| 9 | Cerritos | 16.2% | 9.4% | 2.6% | 4.7% | $ 124,460 | $ 348.19 | $ 175.16 | $ 234.43 | $ 757.78 |
| 10 | Walnut | 14.7% | 10.5% | 3.1% | 6.9% | $ 130,444 | $ 387.46 | $ 78.82 | $ 199.96 | $ 666.24 |
| 11 | **Redondo Beach** | 18.1% | 7.9% | 5.3% | 4.9% | $ 134,033 | $ 298.45 | $ 306.53 | $ 48.27 | $ 653.25 |
| 12 | Santa Clarita | 27.3% | 6.2% | 4.4% | 6.6% | $ 116,186 | $ 57.60 | $ 455.42 | $ 110.32 | $ 623.33 |
| 13 | Arcadia | 14.8% | 10.2% | 4.1% | 6.1% | $ 108,214 | $ 384.85 | $ 105.10 | $ 131.01 | $ 620.95 |
| 14 | Diamond Bar | 15.4% | 10.5% | 3.9% | 5.4% | $ 106,881 | $ 369.14 | $ 78.82 | $ 144.80 | $ 592.76 |
| 15 | La Mirada | 25.0% | 9.9% | 3.5% | 5.5% | $ 104,130 | $ 117.81 | $ 131.37 | $ 172.38 | $ 421.56 |
| 16 | Torrance | 21.0% | 9.8% | 5.7% | 7.0% | $ 109,554 | $ 222.53 | $ 140.13 | $ 20.69 | $ 383.34 |
| 17 | Altadena | 23.3% | 10.4% | 4.4% | 5.2% | $ 123,869 | $ 162.32 | $ 87.58 | $ 110.32 | $ 360.22 |

O2-1
Con't

# 2. Response to Comments



| | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| 18 | Glendora | 27.4% | 10.0% | 4.7% | 5.8% | $ 106,716 | $ 54.98 | $ 122.61 | $ 89.64 | $ 267.23 |
| 19 | Lakewood | 29.9% | 9.9% | 5.7% | 7.0% | $ 113,030 | $ (10.47) | $ 131.37 | $ 20.69 | $ 141.58 |
| | | | | | | | | | | |
| | Average | 18.7% | 8.3% | 3.9% | 5.4% | $ 124,554 | $ 281.92 | $ 272.88 | $ 147.86 | $ 702.66 |
| | Best Possible | 13.8% | 5.6% | 2.4% | 2.2% | | $ 411.03 | $ 507.96 | $ 248.22 | $ 1,167.21 |
| | Worst Possible | 29.9% | 10.5% | 5.7% | 7.0% | | $ (10.47) | $ 78.82 | $ 20.69 | $ 89.04 |
| | **LA County** | **29.5%** | **11.4%** | **6.0%** | **12.6%** | | $ - | $ - | $ - | $ - |

Uses LA County Department of Public Health Data (2018)
Data unavailable for Hermosa Beach and 30 other "LA County Top 50" Income Cities
(1) Data unavailable for Manhattan Beach smoking rate in 2018, used mean replacement method
Above average health performance
Below average health performance
BCHD Cities health performance
(2) Gallup values from BCHD **Taxpayer funded** press release at https://news.gallup.com/poll/194303/good-health-scarce-california-beach-cities-millions-yearly.aspx.
(3) BCHD Beach Cities data is a weighted average of MB and RB. HB not included due to lack of LA County data (too small)

O2-1 Cont'

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

**O2. Response to Comments from the StopBCHD dated September 20, 2024.**

O2-1 This comment was received from the StopBCHD organization, which is a neighborhood quality-of-life community that raises concerns regarding BCHD's commercial development. This comment provides a summary of a survey taken in 2023 on Fair Unbiased Health. This comment does not raise concerns regarding the adequacy of the DPEIR. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

# 2. Response to Comments

## LETTER O3 – StopBCHD

Comment Letter O3

Outlook

**StopBCHD submission on FAR for P-CF Zoning**

**From** Stop BCHD <stop.bchd@gmail.com>
**Date** Thu 2024-09-19 2:52 PM
**To** Planredondo <Planredondo@redondo.org>; Planning Redondo <PlanningRedondo@redondo.org>; GeneralPlanEIR <GeneralPlanEIR@redondo.org>; Sean Scully <Sean.Scully@redondo.org>; CityClerk <CityClerk@redondo.org>

1 attachments (12 MB)
DEIR - BCHD - Analysis of P-CF Zoning Integration.odt;

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

Public Comment: City Council, Planning Commission, GPAC, General Plan record, General Plan EIR

In 2020, StopBCHD provided comments to the City and BCHD on the BCHD Draft EIR for the Wealthy Living Campus. Those comments included the attached document that provides photos and descriptions of all the P-CF parcels as of 2020. It is clear from that material that BCHD is an outlier in FAR as built, and that BCHD's proposed 793,000 sqft full build-out with an FAR of nearly 2.0 would irreparably damage the surrounding neighborhood character and property value. O3-1

The 2020 document is attached.

We stand by our analysis that 0.75 is a maximum FAR and that left unchecked, BCHD will destroy the surrounding neighborhood character and property value.

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

Analysis of the Neighborhood Impacts of P-CF Zoned Parcels in Redondo Beach, CA

Based on information from city Director Brandy Forbes, 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.

Andrews Park

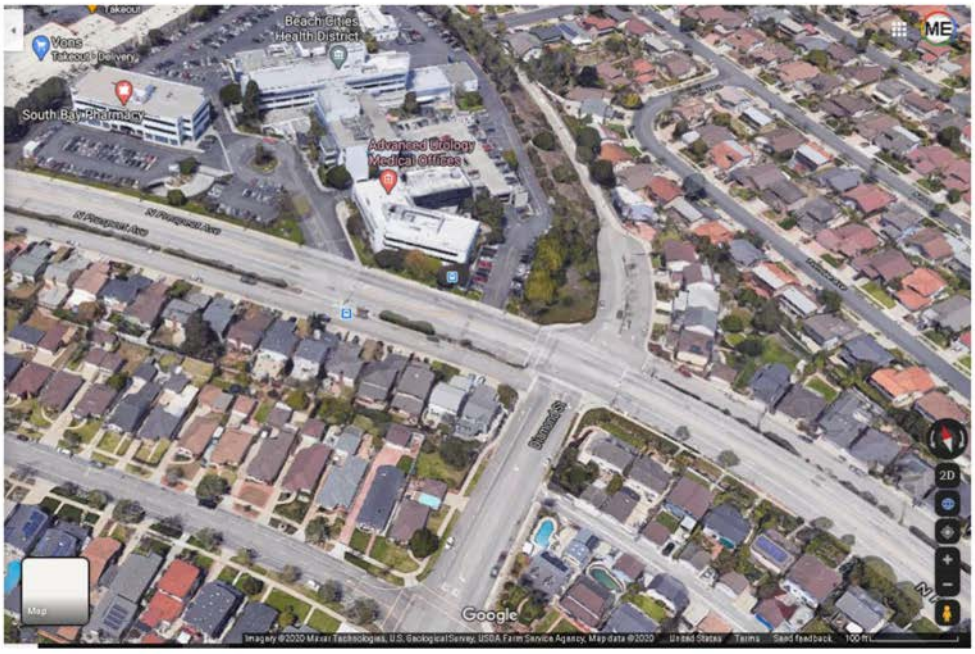
Per the City of Redondo Beach, Andrews Park is local neighborhood recreation facility, "Andrews Parkette is a 1.61 acre park located just north of Grant Avenue in Redondo Beach. The park features grass, trees, play equipment, picnic tables and picnic shelter." Based on observation, there are no features 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, 900-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

# 2. Response to Comments

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.

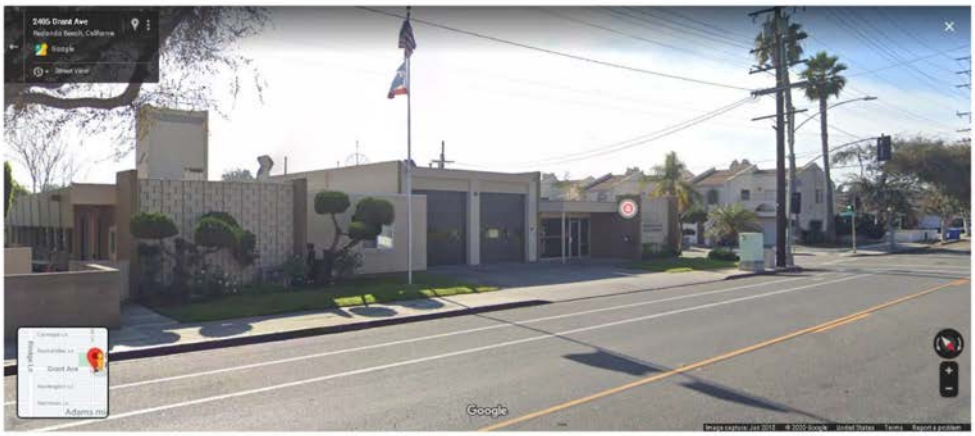

City of Redondo Beach Facility (Beryl St)

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)

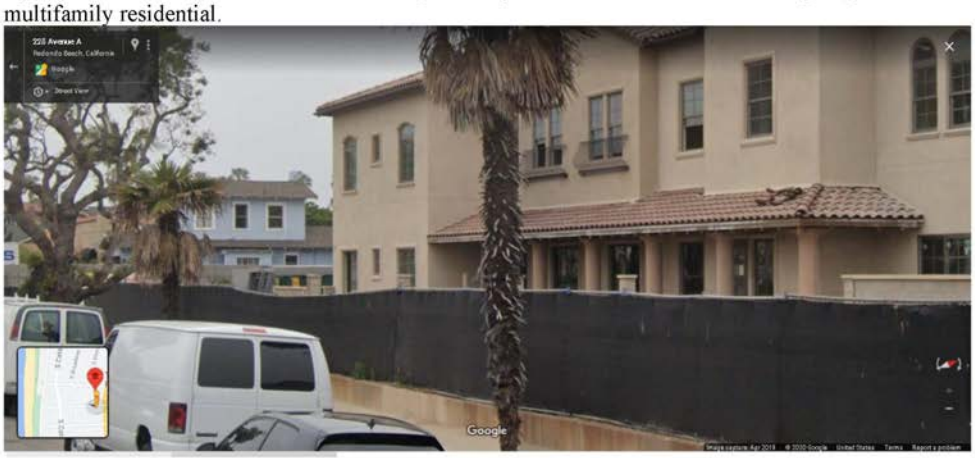
# 2. Response to Comments

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-feet 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.

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, 6-story senior apartments and 8-story, 800+ car parking structure violate the following RBMC section based on height, noise, invasion of privacy, and excess generated traffic.

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:

# 2. Response to Comments

(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.**

**O3. Response to Comments from the StopBCHD, dated September 19, 2024.**

O3-1 This comment is in support of a maximum FAR of 0.75 for the P/I land use designation for BCHD and raises concerns for the preservation of neighborhood character and property value. As discussed in the General Plan Update and DPEIR, implementation of goals and policies would ensure that community character is preserved and consistent with existing uses. Policy LU-2.2 and Policy LU-2.3 would ensure that new projects are compatible with their adjacent neighborhoods. Additionally, goal LU-3 would preserve and improve the character and integrity of existing neighborhoods and districts. As discussed in Section 5.1, *Aesthetics*, of the DPEIR, the City also adopted Objective Residential Standards that provide criteria to maintain residential neighborhood character and ensure new or renovated residential developments are compatible with existing development. Additionally, changes to land use designation analyzed in the DPEIR, including changes to FAR, are consistent with the General Plan buildout; therefore, no changes to the DPEIR are necessary. This comment does not raise concerns regarding the adequacy of the DPEIR. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

# 2. Response to Comments

## LETTER O4 – Mark Nelson

Comment Letter O4

Outlook

**Fwd: Public Comment - Agenda Item J1 Planning Commission**

**From** Stop BCHD <stop.bchd@gmail.com>
**Date** Thu 2024-09-19 5:45 PM
**To** Marc Wiener <Marc.Wiener@redondo.org>; Sean Scully <Sean.Scully@redondo.org>; CityClerk <CityClerk@redondo.org>; Planredondo <Planredondo@redondo.org>; Planning Redondo <PlanningRedondo@redondo.org>; GeneralPlanEIR <GeneralPlanEIR@redondo.org>



Distribute to City Council and Planning Commissioners

Mark Nelson
Representing the participants of StopBCHD.com

First, I remind the commission that BCHD had a $200K per year consultant as the chair of the General Plan Advisory Committee. An enviable position for a pending major developer like BCHD. I wonder if CenterCal or CBRE will sponsor the next GPAC chair? O4-1

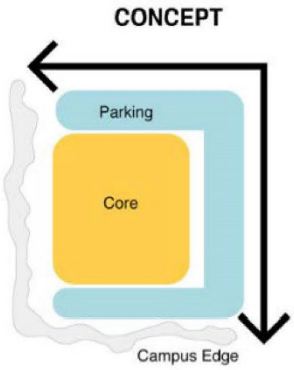
Thank you to Planning staff. Staff's exhibit on pages 99-113 clearly demonstrates the outlier that a 1.25 FAR would be in the public/institutional sector. It also shows excessive developments in other land uses.

BCHD demonstrated to the Community Working Group an FAR 1.95, 793,000 sqft project with 80% to 95% non-resident users according to BCHD's consultant analysis, BCHD's allcove state funding grants, and the national PACE association's analysis. StopBCHDs FAR analysis of P-CF in 2020 also concluded that BCHD was an outlier and that the future development should be restricted to the current FAR via the PCDR process.

We support a MAXIMUM 0.75 FAR for P/I. We are sympathetic to the City of Redondo Beach's needs and due to its nearly 100% service to residents of the City, we can support a higher FAR for the City. The City is also a trustworthy counterparty, unlike our experience with BCHD. O4-2

In May of 2017, at the very first CWG meeting, BCHD committed to protecting surrounding property owners and neighborhoods by building in the center of the campus. (ref, p 25 of 5/2017). BCHD broke that commitment immediately and now plans to MAXIMIZE local damage by building exclusively on the perimeter that it swore to protect. BCHD proposes a 110-feet above Beryl St, 110-150-feet above the Torrance homes on the east, 80-100 feet above the homes on Diamond with a giant parking structure, and 75-100 feet above Prospect homes. Clearly, we cannot leave any facet of BCHD development to chance.

## Healthy Living Campus Parking Approach




We urge the City of limit FAR to 0.75 for P/I.

O4-2
Cont'

# 2. Response to Comments

**O4. Response to Comments from Mark Nelson dated September 17, 2024.**

O4-1 This comment is from Mark Nelson on behalf of the StopBCHD organization. This comment acknowledges BCHD involvement in the General Plan Advisory Committee. This comment does not raise concerns regarding the adequacy of the DPEIR. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

O4-2 This comment is in support of a maximum FAR of 0.75 for the P/I land use designation. Changes to land use designation analyzed in the DPEIR, including changes to FAR, are consistent with the General Plan buildout; therefore, no changes to the DPEIR are necessary. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER O5 – Mark Nelson

Comment Letter O5

Outlook

**Public Comment - 0.75 FAR for P/I Land Use is consistent with protecting surrounding neighborhoods**

**From** Mark Nelson
**Date** Tue 2024-09-17 10:05 PM
**To** Planredondo <Planredondo@redondo.org>; Planning Redondo <PlanningRedondo@redondo.org>; Sean Scully <Sean.Scully@redondo.org>; CityClerk <CityClerk@redondo.org>; GeneralPlanEIR <GeneralPlanEIR@redondo.org>; TRAO News <traonews@gmail.com>

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

Based on the FAR analysis tables in the Planning Commission Agenda Packet beginning on Page 99, it's clear that 1.25 FAR is an outlier and creates eyesores that are inconsistent with neighborhoods. P/I should have a maximum FAR of 0.75 with a grandfather for current structures at their current FAR if it exceeds 0.75. One only needs to look at the FARs above 1.0 in the provided data to understand the magnitude of the mistake of allowing an FAR above 0.75. O5-1

Mark Nelson
Property Owner
StopBCHD.com

# 2. Response to Comments

**O5. Response to Comments from Mark Nelson dated September 17, 2024.**

O5-1 This comment is from Mark Nelson on behalf of StopBCHD organization. This comment is in support of a maximum FAR of 0.75 for the P/I land use designation. Changes to land use designation analyzed in the DPEIR, including changes to FAR, are consistent with the General Plan buildout; therefore, no changes to the DPEIR are necessary. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

## LETTER O6 – Mark Nelson

### Comment Letter O6

Outlook

**BCHD's Lot Size is Incorrect in the Table.**

From Mark Nelson
Date Tue 2024-09-17 8:19 PM
To Planredondo <Planredondo@redondo.org>; Planning Redondo <PlanningRedondo@redondo.org>; CityClerk <CityClerk@redondo.org>; Sean Scully <Sean.Scully@redondo.org>; GeneralPlanEIR <GeneralPlanEIR@redondo.org>

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

Public Comment - Redondo Beach City Council, Planning Commission, General Plan record.

406626 sqft is 9.33 acres. BCHD stated in its preliminary CUP, and the City of Redondo Beach did not comment, that the site is 9.94 acres, or 432986 sqft. That yields an FAR of 0.72. I presume that BCHD had a current survey completed and update the prior +/- that was measured in the 1950s manually. BCHD's Murdoch consultant either misled the City or can provide evidence to support his filing.

From Page 2 of the 2/2022 BCHD drawing set submitted in good faith to the City by BCHD

| | |
|---|---|
| AIN: | 7502-017-903 |
| ZONING DISTRICT | P-CF COMMUNITY FACILITY ZONE |
| LAND USE: | P PUBLIC OR INSTITUTIONAL |
| AREA: | 9.94 ACRES |

| Address | Existing Use | Proposed FAR (CC approved) | Lot Area SF | Building SF | Existing FAR | Aerial View | Street View |
|---|---|---|---|---|---|---|---|
| 514 N Prospect | PI-BCHD | 0.75 | 406,626.00 | 312600 | 0.77 |  |  |

O6-1

# 2. Response to Comments

**O6. Response to Comments from Mark Nelson dated September 17, 2024.**

O6-1 This comment is from Mark Nelson on behalf of the StopBCHD organization. This comment provides information on BCHD and claims that the site is 9.94 acres which yields a FAR of 0.72. This comment does not raise concerns regarding the adequacy of the DPEIR. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER R1 – Geoff Gilbert

## Comment Letter R1

**From:** Geoff Gilbert
**To:** Planredondo; CityClerk; Sean Scully
**Cc:** [redacted] Rosann Taylor; [redacted] Todd Loewenstein; [redacted] Margaret Mckenzie; Mark Nelson (Home Gmail); Paige Kaluderovic; Nils Nehrenheim; Robert Ronne; Residents Against Overdevelopment
**Subject:** Opposing BCHD"s request for exemption of the proposed FAR limits for its Healthy Living Campus
**Date:** Thursday, August 15, 2024 2:53:14 PM

You don't often get email from [redacted] Learn why this is important

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

To the Planning Commission and all concerned;

The Redondo Beach Planning Commission has been working on long term goals and policies for the City's development for the next 30 years.
No easy crystal ball fortune telling here, but a deliberate, critical undertaking to shape and prepare our city for the next two or three generations and beyond.
So, I agree with the proposed 0.75FAR limitations (and the exception of 1.25FAR for City Hall and Planning Commission Annex). We do not have room for "urban sprawl" and increasing the density of development will negatively affect our community.

R1-1

Beach Cities Health District, however, seeks exemption from the 0.75FAR for its "Healthy Living Campus" and has lobbied the public and media for support to pressure the City to allow it to have the same 1.25FAR proposed for the City buildings. It claims the 0.75FAR would prevent it from constructing Phase I of its HLC, thus "limiting health uses on our campus". BCHD's attorney stated the FAR "limits the District's ability to modernize the seismically deficient facility and will result in a reduction of services for the community". Furthermore, that, "it's not uniformly applied" and "*attacks* a particular project", the HLC.

BCHD goes on telling the public what's at risk if the 0.75FAR is approved; the already existing allcove project and Fitness Center. These are good components of BCHD's business but they are already housed in the 514 Building and can be moved almost anywhere. They are really not at risk, nor are the other community health services of BCHD.

What is at risk, and what BCHD continues to deliberately fail to *fully and publicly* explain to the public and media is the Residential Care Facility for the Elderly which is the primary focus of HLC Phase I.

Unlike the Beach Cities Hospital which the citizens voted on to create for the community, this RCFE is a commercial development, to be controlled and operated by a third party developer using our public land and tax dollars. It is not being created specifically for our Beach Cities residents like the former hospital, but for anyone who can afford its premium cost. BCHD weakly explains that any revenue it receives from the developer would essentially trickle down to unspecified services to the Beach City

R1-2

# 2. Response to Comments

community. These unspecified services, if any, are the "health uses" that might be at risk.
The "seismically deficient" buildings are not unsafe. They just do not meet the current seismic building codes, much like most of the public buildings and schools in LA County. This is backed up by BCHD's own seismic consultant. The seismic issue is again a scare tactic BCHD is using to build its RCFE.
**The HLC RCFE therefor is exactly like other commercial assisted living businesses such as Kensington, Sunrise, Oakmont, etc., etc., etc. BCHD's RCFE must follow the same FAR limits as any other commercial development.**
BCHD has not, cannot, give real support to its "warning" that the FAR will "limit health uses" . It has enough resources to maintain its commendable community projects.
.
Finally, the voters of Redondo Beach, Hermosa Beach and Manhattan Beach did not approve the construction of the HLC as they did the original hospital.
Yet, like the hospital that failed under the management of BCHD, the residents will be fiscally liable for the HLC for well over the next 30 years.

Do not make any FAR exceptions to the BCHD HLC commercial development project which meets no standards whatsoever to allow such a waiver.

Sincerely,
Geoff Gilbert
Redondo Beach

R1-2
Cont'

**R1. Response to Comments from Geoff Gilbert, dated August 15, 2024.**

R1-1 This comment acknowledges the City's efforts for long-term goals and policies for development for the next 30 years. The comment is in agreement with the proposed FAR for the BCHD land use designation and states that increasing the density of development will negatively affect the community. This comment does not raise concerns regarding the adequacy of the DPEIR. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

R1-2 This comment notes BCHD's goal to seek exemption from the proposed FAR and summarizes the efforts made by the BCHD to oppose the FAR under its land use designation. The comment requests that no exceptions are made to FAR for the BCHD land use designation. This comment does not raise concerns regarding the adequacy of the DPEIR. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

# 2. Response to Comments

LETTER R2 – Mark Nelson

## Comment Letter R2

**From:** Mark Nelson (Home Gmail)
**To:** Planredondo; Planning Redondo; Sean Scully
**Subject:** PUBLIC COMMENT - Fwd: Gallup study PRA - Lack of Socioeconomic Controls in the Gallup Study
**Date:** Thursday, August 15, 2024 10:53:46 PM

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

Public Comment - Planning Commission - BCHD's vendor Gallup's lack of evidence-based analysis

This California Public Records Request is in and waiting for a response from BCHD's vendors.

---------- Forwarded message ---------
From: **Mark Nelson (Home Gmail)** <[redacted]
Date: Thu, Aug 15, 2024 at 4:04 PM
Subject: Gallup study PRA - Lack of Socioeconomic Controls in the Gallup Study
To: PRR <[redacted] Communications <[redacted]
<[redacted] info <[redacted]

Provide documents demonstrating the statistical control for the following variables directly impacting health levels and outcomes:

| | BCHD | US | BCHD |
|---|---|---|---|
| HH Income | $157.0K | $74.6K | Twice the HH Income of the National average |
| No Health Coverage | 2.4% | 7.9% | One-third of the lack of Health Coverage as the Nation |
| Poverty Rate | 5.0% | 11.5% | Less than one-half the National poverty rate |

These factors are causal for health outcomes and are unrelated to BCHD.

"Across the lifespan, residents of **impoverished communities are at increased risk** for mental illness, chronic disease, higher mortality, and lower life expectancy.9,13–17 Children make up the largest age group of those experiencing poverty.18,19 **Childhood poverty** is associated with developmental delays, toxic stress, chronic illness, and nutritional deficits.20–24 Individuals who experience childhood poverty are more likely to experience poverty into adulthood, which contributes to generational cycles of poverty.25 In addition to lasting effects of childhood poverty, **adults living in poverty are at a higher risk of adverse health effects from obesity, smoking, substance use, and chronic stress**.12 Finally, **older adults with lower incomes** experience higher rates of disability and mortality.6 One study found that men and women in the top 1 percent of income were expected to live 14.6 and 10.1 years longer respectively than men and women in the bottom 1 percent."

https://health.gov/healthypeople/priority-areas/social-determinants-health/literature-summaries

Institute of Medicine (US) Committee on the Consequences of Uninsurance. Care Without

R2-1

Coverage: Too Little, Too Late. Washington (DC): National Academies Press (US); 2002. 3, Effects of Health Insurance on Health. Available from: https://www.ncbi.nlm.nih.gov/books/NBK220636/

Barakat C, Konstantinidis T. A Review of the Relationship between Socioeconomic Status Change and Health. Int J Environ Res Public Health. 2023 Jun 29;20(13):6249. doi: 10.3390/ijerph20136249. PMID: 37444097; PMCID: PMC10341459.

R2-1
Cont'

# 2. Response to Comments

**R2. Response to Comments from Mark Nelson, dated August 15, 2024.**

R2-1 This comment raises concerns regarding impacts to health levels and outcomes. This comment also provides information and links for more information on the relationship between socioeconomic status and health. This comment does not raise concerns regarding the adequacy of the DPEIR. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

.

LETTER R3 – Mark Nelson

## Comment Letter R3

**From:** Mark Nelson (Home Gmail)
**To:** Communications; Jane Diehl; Michelle Bholat; Noel Chun; Martha Koo; Planredondo; Planning Redondo; Paige Kaluderovic; Nils Nehrenheim; Todd Loewenstein; Scott Behrendt; Zein Obagi; Sean Scully
**Subject:** Public Comment - Planning Commission - OPPOSE BCHD"s HLC Plans for FAR of 1.83
**Date:** Thursday, August 15, 2024 4:24:49 PM

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

Per BCHD's planning documents, it seeks a 792,500 sf buildout which yields an FAR of 1.83. With all facilities built at 100-feet or more above the adjacent residential land uses, that is TOTALLY UNACCEPTABLE both in density and height.

Because 99.7% of the entire campus square feet and 99.4% of the hospital square feet are under 52-feet tall, BCHD should be limited to 52-feet with deep setbacks to respect the natural elevated terrain.

An FAR of 0.5 would be the most consistent with the surrounding residential and commercial land uses.

R3-1

# 2. Response to Comments

**R3. Response to Comments from Mark Nelson, dated XX, 2024.**

R3-1 This comment raises concerns for BCHD's proposed FAR compared to the proposed FAR presented in this DPEIR. The commenter suggests a 0.5 FAR in order to be most consistent with surrounding uses. Changes to land use designation, including changes to FAR presented in the DPEIR, are consistent with the General Plan buildout; therefore, no changes to the DPEIR are required. This comment does not raise concerns regarding the adequacy of the DPEIR. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER R4 – Mark Nelson

Comment Letter R4

**From:** Mark Nelson (Home Gmail)
**To:** Sean Scully; Planredondo; Planning Redondo; CityClerk
**Subject:** Public Comment - Planning Commission
**Date:** Thursday, August 15, 2024 7:45:54 PM

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

Regarding Public/Institutional Land Use

We have been considering 0.75 and 1.25 FAR for P/I

I would like to add 0.5 FAR as well into consideration. Many, if not all, P/I sites are surrounding by commercial or residential, both of which are either FAR 0.5 or equivalent. The use of a 0.5 FAR would avoid character assassination of the surrounding neighborhoods.

An FAR bonus system could be used, based on the proposed resident use of the site. For example, City of Redondo Beach facilities are typically used by and benefit residents and that could provide a large FAR bonus. Other facilities, such as a regional jail facility, would get its bonus, if any, based on the fraction of use by the City of Redondo Beach and its residents.

Alternatively, bad development actors could also be managed by requirements in the Zoning requirements. Dynamic height limits could be set by the surrounding property height limits. Setbacks could be a percentage, such as 10% of lot depth with a maximum of 50-feet, as an example.

Unfortunately, I don't know how to assure that these types of Zoning restrictions are assured implementation following the General Plan process and approval.

I'm inclined to limit the FAR to 0.5 or 0.75 to manage the protection of surrounding neighborhoods, unless objective restrictions could be assured during Zoning implementation.

R4-1

# 2. Response to Comments

**R4. Response to Comments from Mark Nelson, dated August 15, 2024.**

R4-1 This comment raises concerns for potential changes of character of surrounding neighborhoods associated with a proposed FAR of 0.75 for the P/I land use designation. The comment requests consideration of 0.5 FAR for the P/I land use designation. As discussed in the General Plan Update, and thus the DPEIR, implementation of goals and policies would ensure that community character is preserved and consistent with existing uses. Policy LU-2.2 and Policy LU-2.3 would ensure that new projects are compatible with their adjacent neighborhoods. Additionally, goal LU-3 would preserve and improve the character and integrity of existing neighborhoods and districts. As discussed in Section 5.1, *Aesthetics*, of the DPEIR, the City also adopted Objective Residential Standards that provide criteria to maintain neighborhood character and ensure new or renovated residential developments are compatible with existing development. Additionally, changes to land use designations analyzed in the DPEIR, including changes to FAR, are consistent with the General Plan buildout; therefore, no changes to the DPEIR are necessary. This comment does not raise concerns regarding the adequacy of the DPEIR. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER R5 – Mark Nelson

## Comment Letter R5

**From:** Mark Nelson (Home Gmail)
**To:** Sean Scully; Planning Redondo; Planredondo; CityClerk
**Subject:** PUBLIC COMMENT: BCHD Apparently Misled the State in its Funding Application for allcove
**Date:** Monday, August 19, 2024 2:14:44 PM

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

Public Comment: City Council, Planning Commission, General Plan

In order to make the Beach Cities Health District more attractive to State investment (likely reason), BCHD included areas of lower income, racial diversity, healthcare provider shortage areas (HPSA) and disadvantaged communities (DC) to its largely White and affluent resident base. Sadly, BCHD has only provide token benefit to the MHSA and DC communities with allcove.

The District consists of Hermosa, Manhattan and Redondo Beach with an average household income of $157,000 per year and a 68.1% White residency. In order to be more attractive for grant purposes (likely reason) BCHD added more diverse cities from SPA8.

The allcove program currently services enrollees that are 74% Hermosa, Redondo, Manhattan, and Torrance. That allcove area has an average household income of $145,000 and is 59.4% White. That is still a solid majority of the demographics that BCHD seems to sought to dilute

However, the 14 SPA8 cities that represent the mental Healthcare Provider Shortage Areas and the Disadvantaged communities have only a household income of $74,000 annually (50% of the current allcove 4-city supermajority), are 75.8% of the SPA8 population (compared to under 20% for the 4-cities), only receive 13.4% of allcove services (compared to 74% of the 4-cities) and are 80.6% non-White.

Based on statistics alone, BCHD appears to have diversity-washed its allcove service area, but failed to provide any meaningful level of services to the downtrodden of SPA8. Further, an Uber RT from Long Beach, the largest constituent of allcove, is approximately $70. Those youth, along with many of the other disadvantaged communities, are economically deprived of participation. BCHD's philosophy of allcove at the beach is disingenuous and continues to keep the segregation of income, race, and health care availability alive and well.

R5-1

**FROM BCHDs FUNDING APPLICATION - BCHD HAS FAILED TO SERVICE THE DISADVANTAGED IN ANY MEANINGFUL WAY**

FROM BCHD FILING WITH THE STATE OF CALIFORNIA
**7. Describe State Priorities**
**Please describe how your project meets the priorities you have selected above (limit 500 words).**
allcove Beach Cities targets 7 of the required state priorities:

# 2. Response to Comments

***Invest in behavioral health and community care options that advance racial and geographic equity***: Through funding from
California's Mental Health Services Oversight and Accountability Commission, BCHD is opening allcove Beach Cities this fall
to expand services to communities in Service-Planning Area 8, including 16 cities and communities of the City of Los
Angeles, which includes more than 1,000,000 people. **allcove Beach Cities will be able to provide services to those 12-25
years old, including 49% Latino population, followed by 26% white, 15% Asian, 8% African American and 2% other.**
**Address urgent gaps in the care continuum for people with behavioral health conditions, including children and youth**: While

R5-1
Cont'

**R5. Response to Comments from Mark Nelson, dated August 19, 2024.**

R5-1 This comment states that BCHD has failed to service the disadvantaged and provides background information on BCHD and its funding application. This comment does not raise concerns regarding the adequacy of the DPEIR. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

# 2. Response to Comments

## LETTER R6 – Frank Briganti

**From:** CityClerk
**To:** Planning Redondo
**Subject:** FW: BCHD massive buildings Project:
**Date:** Monday, August 19, 2024 4:21:40 PM

Hello,

Our apologies, we missed this public communication for the August meeting. It can be added to the next one under public comment.

Thank you,

Melissa Villa
Analyst
City of Redondo Beach | City Clerk's Office
415 Diamond Street | Redondo Beach, CA 90277
[redacted]

Comment Letter R6

-----Original Message-----
From: Frank Briganti <[redacted]
Sent: Thursday, August 15, 2024 10:05 AM
To: CityClerk <[redacted]
Subject: Re: BCHD massive buildings Project:

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

FOR PUBLIC. RECORD & COMMENT
*****For Aug 15,24 Planning Comm Meeting.* 1. Concerns & Questions:
No consideration for 300+ homes & Towers School regarding **Skyline (HillSide Comm ). ** West Torrance PSB within the High Buildings area.
Codes.
No documented safe guards( hazardous medical waste,dust,noise, traffic,etc) for the West surrounding homes!
Allocove structure -Beryl/Flagler(Torr), capped oil well , no documented water table & soil EPAreports. & No traffic/pedestrian impact studies?
This area had been CONTAMINATED WITH BENZENE, TRICHLORETHYLENE, ETC from dry cleaning Bussiness in Von,s area!
This serves NO Health issues to the Southbay residents (RB,HB, MHB) Taxed!
The extended building will be a continued to be revenue$$$$ generating money for BCHD administration .ex, Silverado, medical, lab ,radiology, pharmacy, urgent care, surg center etc. Providence is a revenue source.
Need a forensic audit of BCHD financial BOOKS. - Admin Salaries, Lawyers, PR firms, etc.
This is a Project for a PRIVATE(100%) company?

R6-1

THE 0.5 factor would be the right start , TOsee how this goes for EVERYONE!!!!
THANKS Dr. Frank Tomlee av

R6-2

Sent from my iPad

**R6. Response to Comments from Frank Briganti, dated August 15, 2024.**

R6-1 This comment raises concerns for general health issues associated with uses from the BCHD campus. As discussed in Section 5.8, *Hazards and Hazardous Materials*, this site is not identified as a hazardous site, and implementation of regulatory compliance governing use and transport of hazardous materials would be required for future development. This comment does not raise concerns regarding the adequacy of the DPEIR. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

R6-2 The commenter suggests a FAR of 0.5 for the P/I land use designation. Changes to land use designations analyzed in the DPEIR, including changes to FAR, are consistent with the General Plan buildout; therefore, no changes to the DPEIR are necessary. This comment does not raise concerns regarding the adequacy of the DPEIR. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

# 2. Response to Comments

LETTER R7 – Charlie S.

## Comment Letter R7

**From:** Charlie S
**To:** Planning Redondo; CityClerk
**Cc:** Sean Scully; Eleanor Manzano
**Subject:** RE: BCHD issue is FAR beyond floor space
**Date:** Sunday, August 18, 2024 4:11:58 PM
**Importance:** High

You don't often get email from [redacted] Learn why this is important

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

I would like to understand why my comment below is not shown in the Planning Commission Meeting Minutes on the date of the email.
Thanks, Charlie Szymanski

**From:** Charlie S <[redacted]
**Sent:** Thursday, August 15, 2024 1:39 PM
**To:** [redacted]
**Cc:** 'Charlie Szymanski' <[redacted] 'Sean Scully' <[redacted]
**Subject:** BCHD issue is FAR beyond floor space
**Importance:** High

Dear Commission and Residents:

Plain and simple, Redondo Beach should not be in the passive real estate business. Any public lands and services should be directed to consumptive services for residents or alternatively as chartered.

What I mean by that is that day in and day out our residents need active support from all city resources, whether city employees and staff, our contractors, including for example LA County Lifeguards, and so forth, and any other services paid for and designated for the benefit of taxpayers and residents. Every day or frequently the resources are mostly used up for residents' benefit. Health care in the US being primarily a free market, visionaries decades ago designated this approximately 11 acres toward the everlasting benefit of health improvement for residents. Because the commitment was larger than supportable, other communities were also designated participants. R7-1

When you look at health care, it is the ultimate in a consumptive service. When you use the resources including personnel, equipment, and land and so forth, all that is left is better health and living residents. One could argue that this is the ultimate in good things. The land should be designated for the highest benefit of daily resident users for their benefit or their health. Here we see an organization that wants to use a great deal of 11 acres to benefit a few hundred paying individuals as a passive investment. The greatest good use for this land would be if it can benefit the greatest number of residents in the designated communities. This is FAR BELOW the best benefit of this land to the communities and the about 120,000 individuals to be served. BCHD should not be in the real estate business, no matter who the residents are nor how they benefit. We should have facilities and space to R7-2

serve the active health of the beneficiaries. Discussing FAR for this property is quite appropriate, and as public land the FAR should be less, as it's institutional in nature and esthetics and legacy matter. But limiting the discussion to FAR misses the bigger picture of APPROPRIATE USE FOR THE BENEFIT OF THE COMMUNITY'S HEALTH. Read the Charter and Mission Statement of BCHD; you will find this enterprise does not suit them.

R7-2
Cont'

Charlie Szymanski

[redacted] Nehrenheim

# 2. Response to Comments

**R7. Response to Comments from Charlie S., dated August 18, 2024.**

R7-1 This comment raises concerns regarding the adequacy of City services and resources and emphasizes health care services that would benefit the community. This comment does not raise concerns regarding the adequacy of the DPEIR. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

R7-2 This comment states that as public institutional land, FAR should be less than that proposed under the General Plan buildout. Changes to land use designations analyzed in the DPEIR, including changes to FAR, are consistent with the General Plan buildout; therefore, no changes to the DPEIR are necessary. This comment does not raise concerns regarding the adequacy of the DPEIR. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

## 2.1 PROPOSED CHANGES TO GENERAL PLAN UPDATE

In addition to the comment letters received on the DPEIR, this section of the FEIR also notes the recommendations from planning staff on proposed changes to General Plan Update and provides responses on the effect of the proposed changes to conclusions presented in the DPEIR.

- In response to public comments and planning staff's recommendations proposed changes/edits are being made to the Land Use Element and Implementation Actions. The proposed text updates to the policies and implementation actions of the Land Use Elements do not change the conclusions reached by the DPEIR. (see Section 3, *Revisions to the Draft PEIR*).
- In response to a letter submitted to the City by the Redondo Beach Unified School District (RBUSD) on the General Plan Update (dated July 17, 2024), revisions have been made to change the proposed land use designation of Open Space (OS) to Public Institutional (PI) at the Lincoln Elementary School Fields and Blacktop Area, the Alta Vista Elementary School Fields, and the former Franklin School Site. This change to the proposed land use does not change the analysis or impact conclusion of the FPEIR as the three subject properties are currently designated as Public Institutional (PI), which is consistent with the current and future intended use of the property. These three sites were not factored into the open space calculations included in the Open Space and Conservation Element and reverting the properties back to their original designation will have no material effect on the FPEIR. (see Section 3, *Revisions to the Draft PEIR*).
- Planning staff is recommending to leave the existing Public or Institutional (P) designation of the AES powerplant site and the SCE ROW sites and not amend their designation to Public Utility (PU) as proposed by the Planning Commission. The current General Plan includes a "P" (Public or Institutional) designation for the AES powerplant site and the SCE ROW and the only permitted uses allowed by the Zoning Ordinance and LCP for the AES site are park/open space and utilities. The SCE ROW also conditionally permits agricultural uses, parking lots, and accessory structures in addition to the uses allowed on the AES site. The updated General Plan had proposed to change these properties to a newly created designation, Public Utility (PU), which is defined as providing "for utility uses including easements with public access for recreation and parking." Since the time that this designation was created, the powerplant has been decommissioned and is no longer in operation. Additionally, some changes are likely to the associated SCE ROW infrastructure in the future. Staff therefore recommends maintaining the original (existing) designation of these properties as "P" (Public or Institutional), which provides Governmental administrative and capital facilities, parks, schools, libraries, hospitals and associated medical offices, public cultural facilities, public open space, utility easements, and other public uses. Therefore, maintaining the original/existing designations for these properties will have no material effect on the FPEIR. (see Section 3, *Revisions to the Draft PEIR*).
- In response to the Planning Commission's recommendations to reduce the proposed FAR associated with the Public Institutional land use designation from 0.75 to 0.50 FAR, the General Plan and Zoning Ordinance currently does not place a cap on the FAR for most of the PI zones, with the exception of City Hall and the Annex located on the northeast corner of PCH and Vincent Street, which have a FAR of 1.25. As discussed in detail in Appendix B, *Buildout Methodology*, of the FPEIR, existing uses in the Public Institutional land use category where the FAR in the proposed Land Use plan was set to 0.75 include: 12

public schools, 1 private school, 2 fire stations, a water storage facility and adjacent open space area, the City Yard, the parking lot in Riviera Village, the North Redondo Beach Library, the Kensington Assisted Living Community (developed on school property), and Beach Cities Health District. Estimates for existing uses on public and private school sites and the library range from 0.15 FAR to 0.37 FAR. Other uses (water towers, parking lots, and City Yard) range from 0.00 to 0.09 FAR. The two fire stations are built at 0.28 and 0.53 FAR, respectively. Therefore, reducing the proposed FAR from 0.75 to 0.5 would have no material effect on the FPEIR.

- In response to planning staff's recommendations, to change the proposed C-4 land use designation to C-2 for sites fronting Pacific Coast Highway (PCH), The proposed C-4 land use designation includes a FAR of 1.00 and the same uses proposed under the C-2 land use designation. The C-2 land use designation allows for a FAR of 0.50. Therefore, this change would not result in modifications to the conclusion disclosed in the FPEIR.
- In response to the Planning Commission's and planning staff's recommendations, revisions have been made raise the proposed minimum non-residential FAR from 0.35 to 0.40 for all Mixed-Use land designations. This revision would have no material effect on the FPEIR. (see Section 3, *Revisions to the Draft PEIR*).
- In response to the Planning Commission's and planning staff's recommendations, revisions have been made to revert all proposed Utility (U) designations to their existing Public (P) designation. The proposed Public/Utility (U) land use designation provides for utility uses including easements with public access for recreation and parking is similar in use and intensity to the Public (P) designation. Maximum FAR 0.10. Therefore, this revision would have no material effect on the FPEIR. (see Section 3, *Revisions to the Draft PEIR*).

# 3. Revisions to the Draft PEIR

## 3.1 INTRODUCTION

This section contains revisions to the DPEIR based upon (1) additional or revised information required to prepare a response to a specific comment; (2) applicable updated information that was not available at the time of DPEIR publication; and/or (3) typographical errors.. Changes made to the DPEIR are identified here in ~~strikeout text~~ to indicate deletions and in underlined text to signify additions. This section also includes revisions to additional documents that are part of the proposed project (e.g., technical reports, existing conditions reports, etc.).

The revisions made to the DPEIR merely provide clarification and amplification of issues and impacts already addressed in the DPEIR, and do not disclose any new or more severe impacts. As such, none of the information proposed to be added to the DPEIR is significant new information requiring recirculation pursuant to Public Resources Code Section 21092.1 and CEQA Guidelines Section 15088.5.

## 3.2 REVISIONS IN RESPONSE TO WRITTEN COMMENTS

The following text has been revised in response to comments and recommendations received during the public comment period and Planning Commission hearings.

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In response to Letter A3, page 5.6-29, *References*, of the DPEIR, was revised to add references to the State Tsunami Hazard Area Maps and ASCE Tsunami Design Zone Maps.

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California Geological Survey (CGS) and the California Governor's Office of Emergency Services. 2021. Tsunami Hazard Area Map for Los Angeles County. Multiple scales. https://www.conservation.ca.gov/cgs/tsunami/maps.

American Society of Civil Engineers (ASCE). 2021. ASCE Tsunami Hazard Tool. https://asce7tsunami.online/.

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In response to Letter A3, Figure 5.9-3, *Tsunami Hazards Areas in Redondo Beach*, of the DPEIR, has been revised for accuracy. The following text has been added to address changes.

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### Tsunami

The southwestern portion of the City is in a State of California Tsunami Hazard ~~Inundation~~ Zone Area, as shown in Figure 5.9-3, *Tsunami Hazards Areas in Redondo Beach* ~~(CDOC 2009)~~ (CGS 2021). Tsunamis are a series of large ocean waves generated by large undersea disturbances, such as a major earthquakes or landslides on the sea floor. Tsunamis are not affected by tides or currents—in a tsunami, the whole column of water is moving, not just the surface. When tsunami waves enter shallow water, they rise to form massive moving water

columns called "run-up." The run-up of water many feet high rushes onto shore, striking the coast with tremendous destructive force.

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In response to Letter A3, Section 5.9, Hydrology and Water Quality, of the DPEIR, the following text has been added to address new figures added to the chapter.

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### Tsunami

The southwestern portion of the City is in a State of California Tsunami Hazard ~~Inundation~~ Zone Area, as shown in Figure 5.9-3, *Tsunami Hazards Areas in Redondo Beach* ~~(CDOC 2009)~~ (CGS 2021). Tsunamis are a series of large ocean waves generated by large undersea disturbances, such as a major earthquakes or landslides on the sea floor. Tsunamis are not affected by tides or currents—in a tsunami, the whole column of water is moving, not just the surface. When tsunami waves enter shallow water, they rise to form massive moving water columns called "run-up." The run-up of water many feet high rushes onto shore, striking the coast with tremendous destructive force.

Coastal areas in Los Angeles County are vulnerable to both local (<621 miles away) and distant-source tsunamis, although a local tsunami would be more devastating and could reach the coast in less than 30 minutes after the initial earthquake. The source of most local-source tsunamis will be earthquakes and landslides off the Cascadia subduction zone, the closest subduction zone to the California coast (LACOES 2006). According to the City's LHMP, approximately 600 households and nine key facilities in the City are within the Tsunami Inundation Zone Area (Redondo Beach 2020).The National Weather Service monitors for tsunamis and facilitates the tsunami warning system to alert areas that may face tsunamis. The Redondo Beach Fire Department also provides information for evacuation routes in the City and a guide for tsunami safety and awareness on its website (RBFD 2024). Provisions in the City's LCP, RBMC, and LHMP include requirements for development in order to reduce the effects of tsunami flooding hazards. Additionally, the ASCE Standards Committee has developed Chapter 6, Tsunami Loads and Effects, which provides standards to five western states, including California, for building design and other structures to withstand the effects of tsunamis. See Figure 5.9-3, *ASCE Tsunami Design Zone in Redondo Beach*, which showcases appropriate tsunami design zones in the city (ASCE 2021).

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In response to Letter A3, pages 5.9-43 through 5.9-44, *References*, of the DPEIR, references have been revised for accuracy.

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~~California Department of Conservation (CDOC). 2009. Los Angeles County Tsunami Inundation Maps. https://www.conservation.ca.gov/cgs/tsunami/maps/los-angeles.~~

California Geological Survey (CGS) and the California Governor's Office of Emergency Services. 2021. Tsunami Hazard Area Map for Los Angeles County. Multiple scales. https://www.conservation.ca.gov/cgs/tsunami/maps.

American Society of Civil Engineers (ASCE), 2021. ASCE Tsunami Hazard Tool. https://asce7tsunami.online/.

———. 2015. ASCE 7 Tsunami Loads and Effects Design Standard. https://ascelibrary.org/doi/10.1061/9780784479117.124#:~:text=The%20Tsunami%20Loads%20and%20Effects%20Subcommittee%20of,and%20Effects%20chapter%20will%20become%20the%20first.

Los Angeles County Office of Emergency Management (LACOES). 2018, June ~~2006, March 29~~. Los Angeles County Operational Area Emergency Response Plan, Tsunami Annex. https://ceo.lacounty.gov/wp-content/uploads/OEM/Tsunami%20Annex.pdf.

In response to Letter A3, page 5.13-1 through 5.13-15, *Bibliography*, of the DPEIR, have been revised for accuracy.

~~California Department of Conservation (CDOC). 2009. Los Angeles County Tsunami Inundation Maps. https://www.conservation.ca.gov/cgs/tsunami/maps/los-angeles.~~

California Geological Survey (CGS) and the California Governor's Office of Emergency Services. 2021. Tsunami Hazard Area Map for Los Angeles County. Multiple scales. https://www.conservation.ca.gov/cgs/tsunami/maps.

American Society of Civil Engineers (ASCE), 2021. ASCE Tsunami Hazard Tool. https://asce7tsunami.online/.

———. 2015. ASCE 7 Tsunami Loads and Effects Design Standard. https://ascelibrary.org/doi/10.1061/9780784479117.124#:~:text=The%20Tsunami%20Loads%20and%20Effects%20Subcommittee%20of,and%20Effects%20chapter%20will%20become%20the%20first.

Los Angeles County Office of Emergency Management (LACOES). 2018, June ~~2006, March 29~~. Los Angeles County Operational Area Emergency Response Plan, Tsunami Annex. https://ceo.lacounty.gov/wp-content/uploads/OEM/Tsunami%20Annex.pdf.

The following are proposed changes/edits to the Draft "Land Use Element" for the City Council's consideration as recommended by the Planning Commission at their public hearings on August 1, 2024 and September 19, 2024.

Global Changes throughout the DPEIR. The following text has been revised to reflect changes in the General Plan Update.

- **Policy LU-1.11 Creation and Distribution of Parkland**. Promote the creation of new open space and community serving amenities throughout Redondo Beach to achieve minimum parkland standards and to keep pace with the increase in multi-unit housing development. This policy includes specific prioritization of opportunities at the current power plant site and powerline right of ways. Additionally, the City will prioritize opportunities for parkland expansion in park deficient areas. The Housing Element indicates there will be 9,400 new residents by 2040 with full development buildout. If Redondo Beach does not increase its park acreage (current total equals 148.8 acres), instead of the current 3.1 acres per 1,000 residents (low ratio by many standards) the City will only have 1.9 acres per 1,000 residents. Locations of additional parkland sites is essential for the city to maintain its existing parkland ratio.

# 3. Revisions to the Draft EIR

Page 5.4-13, Section 5.4.3*, Proposed General Plan Goals and Policies*, of the DPEIR, was revised to reflect changes in the General Plan Update.

- **Policy LU-7.1: Historic landmarks and districts.** Encourage the voluntary designation of potentially historic resources as landmarks or historic districts. Strengthen the City's objective identification of potentially historic buildings, resources, landmarks, or historic districts in residential, commercial, public/institutional, and industrial zones.

Page 5.9-29, Section 5.9.3, *Proposed General Plan Goals and Policies*, of the DPEIR, was revised to reflect changes in the General Plan Update.

- **Policy LU-5.10 Develop a Green Infrastructure Plan.** Green infrastructure is an approach to water management that protects, restores, or mimics the natural water cycle. Green infrastructure is effective, economical, and enhances community safety and quality of life. It means planting trees and restoring wetlands rather than building a costly new water treatment plant.

Page 5.16- 6, Section 5.16.3, *Proposed General Plan Goals and Policies*, of the DPEIR, was revised to reflect changes in the General Plan Update.

- **Policy LU-7.1: Historic landmarks and districts.** Encourage the voluntary designation of potentially historic resources as landmarks or historic districts. Strengthen the City's objective identification of potentially historic buildings, resources, landmarks, or historic districts in residential, commercial, public/institutional, and industrial zones.

Page 5.11-49, Section 5.11, *Noise*, of the DPEIR, was revised to address a typographical error in the impact statement which should state 5.11-3.

Implementation of Mitigation Measures N-2 and N-3 would reduce Impact ~~5.13-3~~ 5.11-2 to less-than-significant levels.

Page 3-4, Section 5.13.1, *Fire Protection and Emergency Services*, of the DPEIR, was revised to address a typographical error in the impact statement which should state 5.13-1.

Impact 5.1~~5~~3-1: The proposed project would introduce new structures and residents into the Redondo Beach Fire Department service boundaries, thereby increasing the requirement for fire protection equipment and personnel. [Threshold FP-1]

Appendix I General Plan Implementation. The following text has been revised to reflect changes as recommended by the Planning Commission at their public hearings on August 1, 2024, and September 19, 2024.

Land Use Element Implementation Actions

| Implementation Action | | Applicable Policy | Responsible Department | Time Frame |
|---|---|---|---|---|
| IM-LU-14 | **Redondo Beach objective design standards and applicant guidelines.** Update the residential design guidelines that direct architectural design, building siting and orientation, neighborhood identity including monumentation, wayfinding, placemaking elements, and other public realm features for mixed-use areas, transit-oriented higher intensity areas, and residential overlays. | LU-2.2, LU-2.3, LU-2.5, LU-2.6, LU-2.8, LU-3.2, LU-3.3, LU-3.5, LU-6.14 | Community Development | Short, ongoing. The Objective Design Standards will be reviewed every three years. |
| IM-LU-34 | **Public noticing and education**. Review and evaluate existing public noticing requirements for development projects to ensure adequate public awareness. Develop a public education and outreach plan for land use related issues which can be iterated and utilized throughout the year. | LU-3.11 | Community Development | Short term |
| IM-LU-37 | **Health in corridors.** Require a Health Risk Assessment to identify best practices to minimize air quality and noise impacts when considering new residential uses within 500 feet of a freeway. Continue to use appropriate risk assessment standards. | LU-4.2 | Community Development | Short term |

# 3. Revisions to the Draft EIR

## Land Use Element Implementation Actions

| Implementation Action | | Applicable Policy | Responsible Department | Time Frame |
|---|---|---|---|---|
| IM-LU-39a | **Harbor amenities plan.** Implement the Harbor Amenities Plan. The Harbor Amenities Plan serves to promote and enhance the City's coastal amenities and provide improved coastal access and coastal recreational opportunities. | LU-4.3 | Community Development and Waterfront Economic Development | Short, Midterm |
| IM-LU-42 | **CAP.** Continue to implement the strategies identified in the City of Redondo Beach Climate Action Plan (CAP). Update the City's existing Climate Action Plan. | LU-5.2, LU-5.5, LU-5.6 | Community Development, Public Works | Short, ongoing |
| IM-LU-44 | **Landscaping**. Evaluate the potential of establishing landscape design criteria/guidelines that require the exclusive use of native California ~~and~~ drought resistant vegetation in all housing and commercial developments. | LU-5.2, LU-5.5 | Community Development | Short term |
| IM-LU-45 | **Urban Forest.** Continue to investigate the development of an urban forest ordinance to provide for the consistent use of street trees to identify City streets, neighborhoods, commercial districts, and community gateways, consistent with the City's list of approved tree species. Conduct a survey of public streets, and identify areas where street trees do not exist, but could be supported. Partner with community groups and seek funding to expand the urban forest in these areas, with priority given to areas identified as park-deficient in the Parks Master Plan or Open Space and Conservation Element. Conduct an accurate count of tree acreage (percentage of the city's total area) and establish a tree coverage target percentage of 29%. | LU-5.8, LU-5.9 | Public Works, Community Development | Midterm |

Land Use Element Implementation Actions

| Implementation Action | | Applicable Policy | Responsible Department | Time Frame |
|---|---|---|---|---|
| IM-LU-46a | **Heat island mitigation.** Develop a "heat island" mitigation plan that includes guidelines for cool roofs, cool pavements, and strategically placed shade trees. Require all new development and major rehabilitation (i.e., additions of 25,000 square feet of office/retail commercial or 50,000 square feet of industrial floor area) projects to incorporate any combination of the following strategies to reduce heat gain for 50 percent of the non-roof, impervious-site landscape, which includes roads, sidewalks, courtyards, parking lots, and driveways: shaded within five years of occupancy; paving materials with a Solar Reflectance Index (SRI) of at least 29; open grid pavement system; and parking spaces underground, under deck, under roof, or under a building. Any roof used to shade or cover parking must have an SRI of at least 29. | LU-5.6 | Community Development and Public Works | Midterm |
| IM-LU-46b | **Green infrastructure plan.** Update Municipal Code to include regulations for green roofs, vertical meadows, retention wells/ponds, rain gardens, curb cuts for bioswales, and permeable surfaces. | LU-5.10 | Community Development and Public Works | Midterm |
| IM-LU-46c | **Environmental sustainability civic engagement plan.** Development an education and public outreach environmental sustainability plan in partnership with local environmental non-profit organizations. | LU-5.11 | Community Development and Public Works | Midterm |

# 3. Revisions to the Draft EIR

## Land Use Element Implementation Actions

| Implementation Action | | Applicable Policy | Responsible Department | Time Frame |
|---|---|---|---|---|
| IM-LU-60 | **Historic properties**. Update, expand, and periodically update the Citywide Historic Properties Survey to identify potential historic resources for placement on local Register and those that are at risk of losing their historic value. Include details documenting architecturally significant features that could be salvaged and reused. Consider including historically significant public landscape features, including specimen trees be designated as landmarks and preserved. | LU-2.1, LU-7.1, LU-7.3, LU-7.4, LU-7.9 | Community Development | Short term |
| IM-LU-66 | **Historic preservation ordinance**. Update and periodically review the historic preservation ordinance to incorporate findings of the updated Historic Resources Survey. Develop the City processes and ordinances to objectively designate historic buildings, resources, landmarks, and historic districts. Develop the City processes and ordinances required to protect and preserve historic buildings, resources, landmarks, and historic districts that have been designated as historic. | LU-7.9 | Community Development | Short term |

Land Use Element Implementation Actions

| | Implementation Action | Applicable Policy | Responsible Department | Time Frame |
|---|---|---|---|---|
| IM-LU-67 | **Special Policy Areas.** Identify and prioritize which special policy areas would most benefit from an area plan, specific plan, or corridor plan. As resources permit, develop and implement identified plans in order of priority. Resulting plans may include, but are not limited to the following, as appropriate for each area:<br>• Strategies to promote desired reinvestment and redevelopment;<br>• Regulations, and design standards with consideration of the character, history and uniqueness of existing corridors and neighborhoods. (Including standards that minimize impact of higher intensity development near established neighborhoods, and minimize viewshed impacts of new development on established neighborhoods)<br>• A public realm plan to achieve a unified vision for long-term improvements to streets, sidewalks, plazas, other public spaces, and placemaking elements including landscaping palettes that uniquely identify unique commercial districts and residential neighborhoods in the City.<br>• Public improvement priorities and pilot projects for inclusion in the City's Capital Improvement Program. | SPA-1, SPA-4, SPA-5, SPA-6, SPA-7 | Community Development | Short, Midterm |

# 3. Revisions to the Draft EIR

**Land Use Element Implementation Actions**

| Implementation Action | Applicable Policy | Responsible Department | Time Frame |
|---|---|---|---|
| • Strategies to integrate improvements that facilitate transit use.<br><br><u>Identify Special Policy Areas PCH North (SPA-5A), PCH Central (SPA-5B), and Torrance Blvd. (SPA-5C) as a priority and establish new parking ratio and increased FAR standards as a short-term action item.</u> | | | |

Figure 3-5, *Proposed Land Use Plan*, page 3-21, *Project Description,* and Table 3-4, *Summary of Existing and Proposed Land Uses*, page 3-23, of the DPEIR, has been revised in response to a letter submitted to the City by the Redondo Beach Unified School District (RBUSD) on the General Plan Update (dated July 17, 2024), to change the proposed land use designation of Open Space (OS) to Public Institutional (PI) at the Lincoln Elementary School Fields and Blacktop Area, the Alta Vista Elementary School Fields, and the former Franklin School Site.

Figure 3-5, *Proposed Land Use Plan*, page 3-21, *Project Description*, and Table 3-4, *Summary of Existing and Proposed Land Uses*, page 3-23, of the DPEIR, has been revised in response to Planning Commission's and planning staff's recommendations to change the proposed land use designation of the AES powerplant site and the SCE ROW site from Public Utility (PU) to Public or Institutional (P).

Table 3-4, *Summary of Existing and Proposed Land Uses*, page 3-23, of the DPEIR, has been revised in response to Planning Commission's and planning staff's recommendations to raise the proposed minimum non-residential FAR from 0.35 to 0.40 the proposed C-4 land use designation to C-2 for sites fronting Pacific Coast Highway (PCH). C-4 land use designation has the same uses as C-2 land uses and therefore would not affect the analysis of the DPEIR.

Figure 3-5, *Proposed Land Use Plan*, page 3-21, *Project Description*, and Table 3-4, *Summary of Existing and Proposed Land Uses*, page 3-23, of the DPEIR, has been revised in response to Planning Commission's and planning staff's recommendations, revisions to revert all Utility (U) designation to Public (P). The proposed Public/Utility (U) land use designation provides for utility uses including easements with public access for recreation and parking is similar in use and intensity to the Public (P) designation. Maximum FAR 0.10. Therefore, this revision would have no material effect on the FPEIR. .

# Appendix A Attachments to Comment Letter A3

# Appendices

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# Notable Historical Tsunamis in Los Angeles County

Run-up amplitude, in feet, above normal tide conditions

OBS = observed tsunami activity
NR = No damage or severe conditions reported

- Distant Source - Tsunamis without felt earthquakes

- Local Source - Earthquake and tsunami together

| Date | Magnitude-Source area | Tsunami location | Run-Up/Amp | Remarks |
|---|---|---|---|---|
| 7/10/1855 | multiple local Eqs | Santa Monica | ? | "...considerable commotion in the water, attended by a strong rushing sound..." |
| 8/13/1868 | M8.5 - Chile | LA/San Pedro | 2 ft | "...the loading dock was submerged..." |
| 5/10/1877 | M8.3 - Chile | LA/San Pedro | 6 ft | "...The current was frightfully swift to look at..." |
| 8/10/1879 | moderate local EQ | Santa Monica | ? | Minor "tidal wave" followed EQ |
| 4/13/1923 | M7.2 - Kamchatka | LA/San Pedro | ? | "...ships had difficulty holding their lines due to swirling tides..." |
| 8/30/1930 | meteotsunami? | Santa Monica | 10 ft | One person killed due to high surf; conjecture on tsunami source; possible LS from local M5.2 EQ |
| 4/1/1946 | M8.8 – Aleutian Islands | LA/San Pedro | 3 ft | Broke ships from moorings |
| | | Long Beach | 1 ft | NR |
| | | Catalina | 6 ft | Damage to docks |
| 11/4/1952 | M9.0 - Kamchatka | Santa Monica | 2 ft | NR |
| | | LA/San Pedro | 1 ft | Docking ferry problematic |
| | | Long Beach | 1 ft | NR |
| 3/9/1957 | M8.6 - Aleutian Islands | Santa Monica | 2 ft | NR |
| | | LA/San Pedro | 1 ft | NR |
| | | Long Beach | 1 ft | NR |
| 5/22/1960 | M9.5 - Chile | Santa Monica | 5 ft | NR |
| | | LA/San Pedro | 3 ft | One death (swimmer); $1M in damages; 800 small craft unmoored, 200 damaged, 40 sunk |
| | | Long Beach | 3 ft | Dock damage |
| | | Alamitos Bay | 2 ft | NR |
| | | Catalina | 2 ft | NR |
| 3/28/1964 | M9.2 – Alaska | Santa Monica | 3 ft | One boat sunk; $100k damage at Marina Del Rey |
| | | LA/San Pedro | 2 ft | One death to longshoreman by falling object; $250k in damages; 100 boats unmoored, 6 sunk |
| | | Long Beach | ? | $100k in damages |
| | | Alamitos Bay | 2 ft | NR |
| | | Catalina | 2 ft | NR |
| 11/29/1975 | M7.1 - Hawaii | Catalina | 4 ft | Damage to dock and boats |
| 9/29/2009 | M8.0 – Samoa | LA/San Pedro | 1 ft | NR |
| 2/27/2010 | M8.8 – Chile | Santa Monica | 2 ft | Minor damage in Marina Del Rey |
| | | LA/San Pedro | 1 ft | Minor damage to docks and boats |
| | | Long Beach | ? | NR |
| | | Catalina | 3 ft | Minor damage to several docks |
| 3/11/2011 | M9.0 - Japan | Santa Monica | 3 ft | Minor damage in Marina Del Rey |
| | | Redondo B. | 2 ft | One dock, five boats damaged; $15K in damage |
| | | LA/San Pedro | 2 ft | Minor damage to boats and docks |
| | | Long Beach | ? | Damage to dock and boats |
| | | Catalina | ? | Damage to several docks and boats |

CGS CALIFORNIA GEOLOGICAL SURVEY
Cal OES GOVERNOR'S OFFICE OF EMERGENCY SERVICES
USC UNIVERSITY OF SOUTHERN CALIFORNIA
NOAA
FEMA
THE NATIONAL TSUNAMI HAZARD MITIGATION PROGRAM (U.S.)

# Tsunami Source Scenario Model Results for Los Angeles County

2019 UPDATE - Near shore tsunami heights (flow depths) for both local and distant source scenarios, in FEET above Mean Sea Level.
NOTE: The projections do not include any adjustments for ambient conditions, such as storm surge and tidal fluctuations, and model error (it is very important to note this difference, as those numbers can increase the projected water height during an event).

| | TSUNAMI SOURCES | Approximate Travel Time | Leo Corrillo State Beach | Malibu Beach/ Lagoon | Santa Monica Pier | Marina Del Rey | Manhattan Beach | Redondo Beach | Palos Verdes Hills | San Pedro-POLA | Long Beach Middle Harbor-POLB | Long Beach | Naples-Alamitos Bay | Catalina-Avalon | Catalina-Two Harbors |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Local Sources | M7 Newport-Inglewood Fault | 10-15min | | | | | | | | 2 | 3 | 3 | 3 | | |
| | M7.5 Channel Isl. Thrust Fault | 10-15min | 4 | | 3 | 2 | 3 | 3 | 3 | | | | | | |
| | M7.2 Anacapa Dume Thrust Fault | 10-15min | | 8 | 6 | 3 | 6 | 6 | 5 | | | | | | |
| | Palos Verdes Landslide 1 | 10-15min | | | 7 | 4 | 6 | 10 | 20 | 4 | 4 | 4 | 5 | | |
| | Palos Verdes Landslide 2 | 10-15min | | | | | | | | 6 | 5 | 5 | 5 | 12 | 16 |
| | M7.1 Santa Monica Thrust Fault | 10-15min | | 4 | 5 | 3 | 3 | 4 | 3 | | | | | | |
| | M7.7 Catalina Fault | 15-20min | 4 | 6 | 6 | 5 | 6 | 6 | 6 | 5 | 7 | 7 | 7 | 27 | 10 |
| Distant Sources | M9 Cascadia-full rupture | 2hr | | | 4 | 4 | 4 | 4 | 3 | 3 | 4 | 4 | 4 | 3 | 3 |
| | M9.2 Alaska 1964 EQ | 6hr | 5 | 5 | 7 | 6 | 5 | 4 | 4 | 8 | 7 | 9 | 8 | 4 | 4 |
| | M9.3 Alaska-East Aleutians | 6hr | 7 | 8 | 14 | 14 | 9 | 8 | 7 | 9 | 8 | 12 | 13 | - | - |
| | M8.9 Central Aleutians I | 6hr | 3 | | 5 | 5 | 4 | 4 | 4 | 4 | 5 | 5 | 4 | | |
| | M8.9 Central Aleutians II | 6hr | | | 3 | 4 | 3 | 4 | 3 | 3 | 3 | 4 | 4 | | |
| | M9.2 Central Aleutians III | 6hr | 6 | 7 | 10 | 10 | 7 | 6 | 5 | 13 | 10 | 11 | 13 | 5 | 5 |
| | M9 Kamchatka 1952 EQ | 9hr | 3 | | | | | | | | | | | | |
| | M8.8 Kuril Islands II | 10hr | | | 3 | 2 | 3 | 2 | 2 | 2 | 3 | 3 | 3 | | |
| | M8.8 Kuril Islands III | 10hr | | | 3 | 3 | 3 | 3 | 2 | 2 | 3 | 3 | 3 | | |
| | M8.8 Kuril Islands IV | 10hr | | | 3 | 3 | 3 | 3 | 2 | 2 | 3 | 3 | 3 | | |
| | M8.8 Japan II | 11hr | | | 3 | 3 | 3 | 3 | 2 | 2 | 3 | 3 | 3 | | |
| | M9.5 Chile 1960 EQ | 13hr | | | 5 | 5 | 4 | 4 | 4 | 4 | 7 | 9 | 10 | 3 | 3 |
| | M9.4 Chile North | 13hr | 5 | 5 | 5 | 6 | 5 | 5 | 5 | 4 | 10 | 9 | 11 | 4 | 5 |
| | **Maximum Runup - Local Source** | | **4** | **9** | **8** | **5** | **7** | **11** | **24** | **7** | **8** | **8** | **8** | **30** | **18** |
| | **Maximum Runup - Distant Source** | | **7** | **9** | **11** | **11** | **8** | **7** | **5** | **15** | **12** | **13** | **15** | **7** | **7** |
| | **UPDATED Maximum Runup - Distant Source** | | **8** | **9** | **15** | **15** | **10** | **9** | **9** | **10** | **10** | **14** | **15** | - | - |

THE NATIONAL TSUNAMI HAZARD MITIGATION PROGRAM (U.S.)

2019 Updated Source Information

# Appendix B Attachments to Comment Letter A4

# Appendices

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# Attachment 1

# Seismic Risk Consulting Report

**by ImageCat, Inc.**


## Beach Cities Health Center

**514 North Prospect Avenue**
**Redondo Beach, CA 90277**

**Prepared For:**

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

**October 21, 2021**

ImageCat, Inc.

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

October 21, 2021

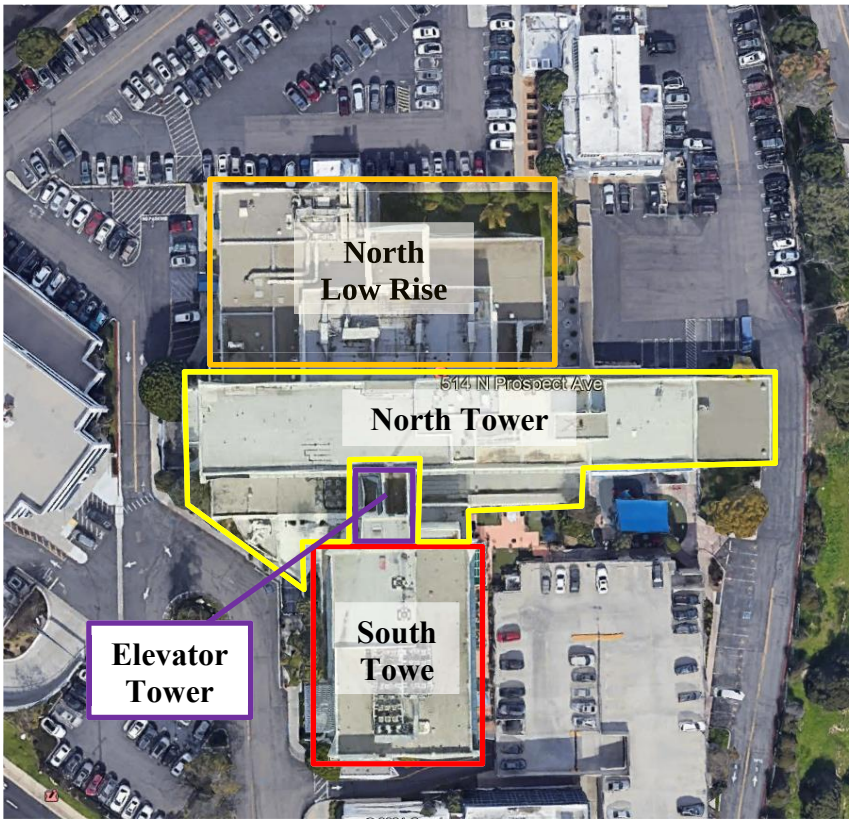
Beach Cities Health District
514 North Prospect Avenue
Redondo Beach, CA 90277

Attention: Tom Bakaly, Chief Executive Officer

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

Dear Mr. Bakaly,

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




**Site View**

## Purpose of the Study

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

## Scope of Study

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

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

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

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

## Reliance

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

## Organization of This report

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

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

Appendices

# 1. Site Seismic Hazards

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

## 1.1 Seismic Setting

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

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

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

## 1.2 Local Faulting

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

**Distance from Site to Regional Faults**

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

*SS = Strike-slip; RV = Reverse*

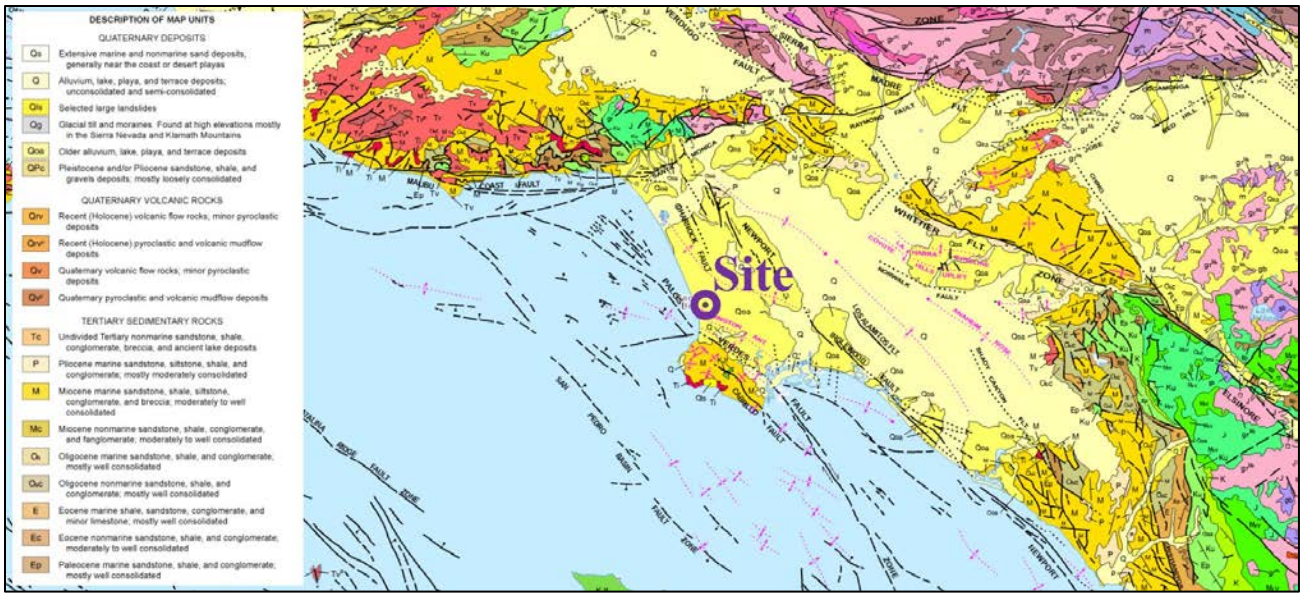



**Figure 1 – Site Location, Geology and Local Faulting [CGS]**

### 1.3 Surface Fault Rupture

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

### 1.4 Landslide

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

### 1.5 Liquefaction

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

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

### 1.6 IBC Classification of Soils

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

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

## 1.7 Strong Ground Shaking

### *1.7.1 Previous Ground Shaking*

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

### *1.7.2 Future Ground Shaking*

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

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

## 1.8 Other Seismic Hazards

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

## 1.9 Discussion of Hazards

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

# 2. Building Vulnerability

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

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

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

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

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

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

## 2.1 Building Seismic Vulnerability

*2.1.1 North Tower*

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

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

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

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

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

*Condition:* Fair to good.

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

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

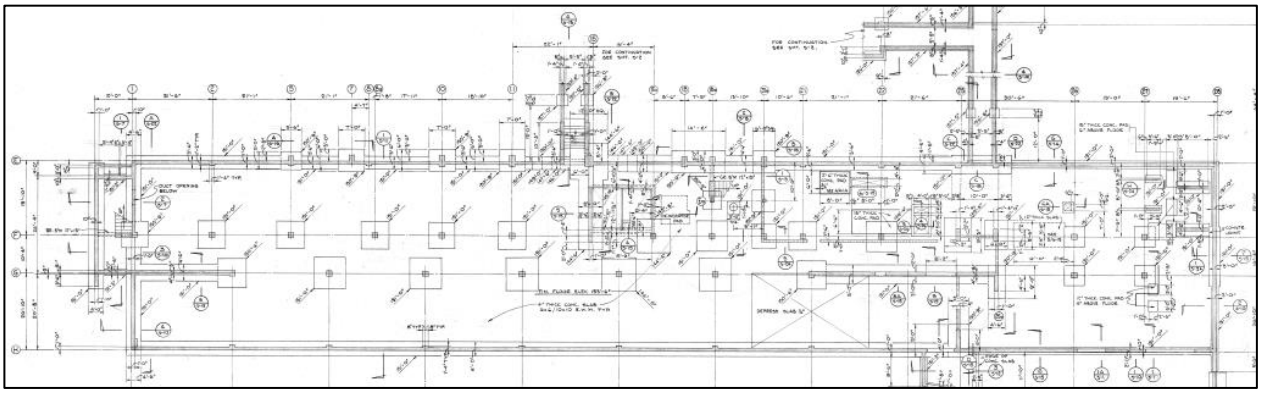


**Figure 2 – Foundation and Basement Plan (North Tower)**

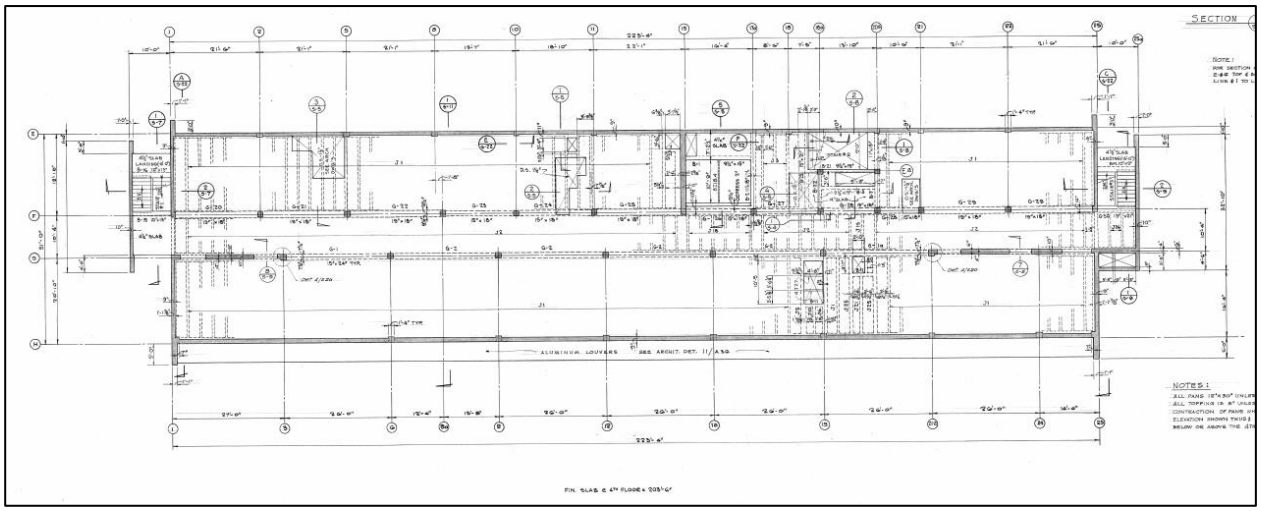


**Figure 3 – 4th Floor Framing Plan (North Tower)**

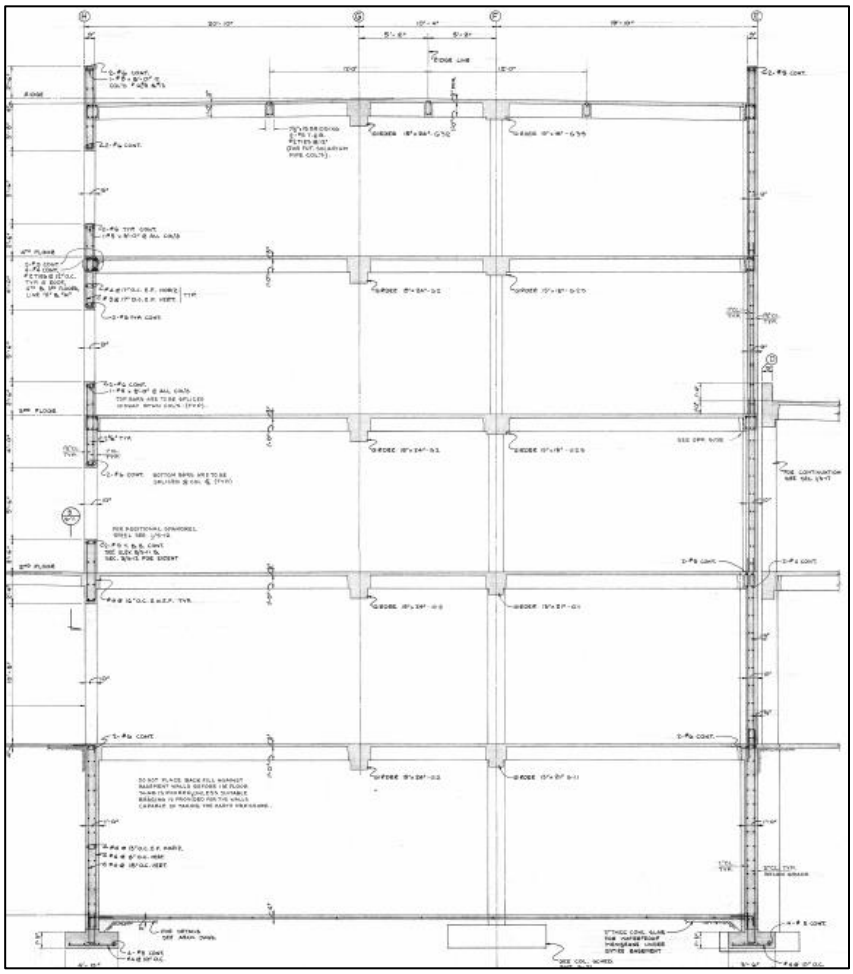


**Figure 4 – Building Section (North Tower)**

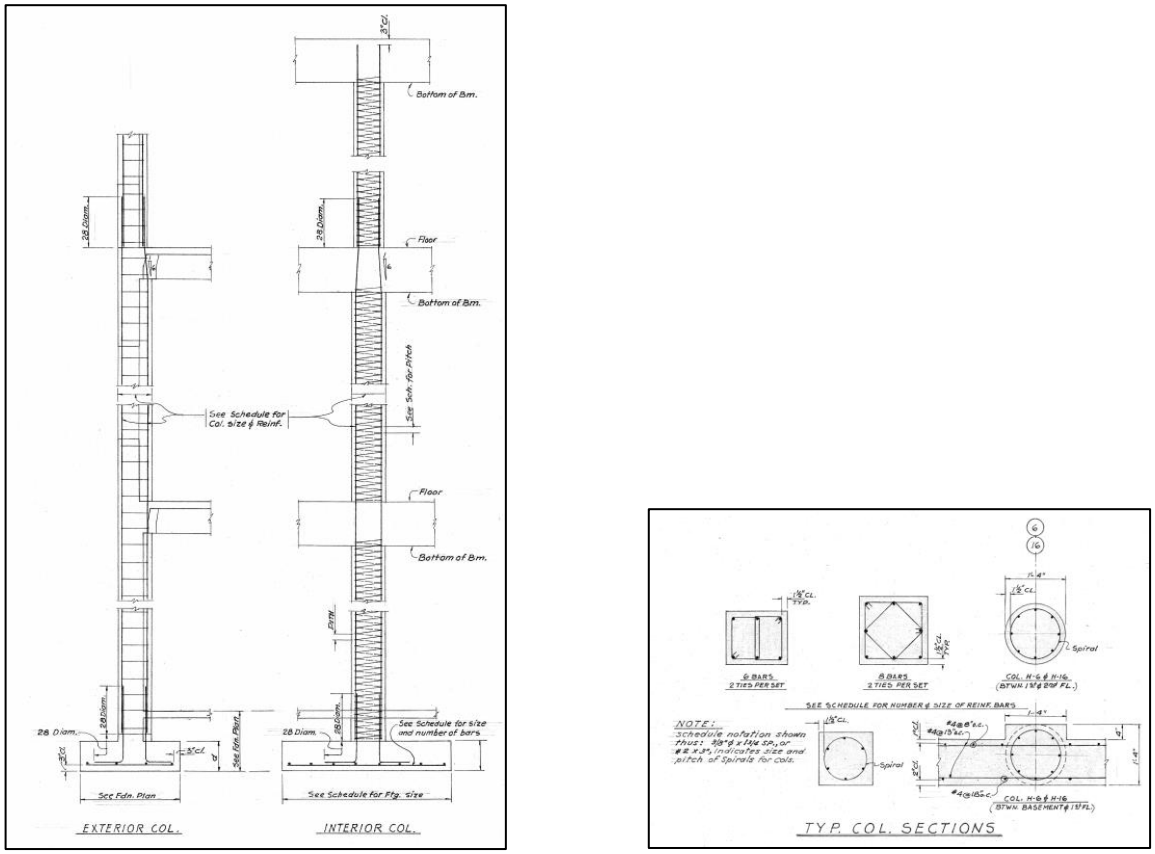



**Figure 5 – Column Elevation and Details (North Tower)**

*2.1.2 South Tower and Elevator Tower*

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

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

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

*Condition:* Fair to Good.

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

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

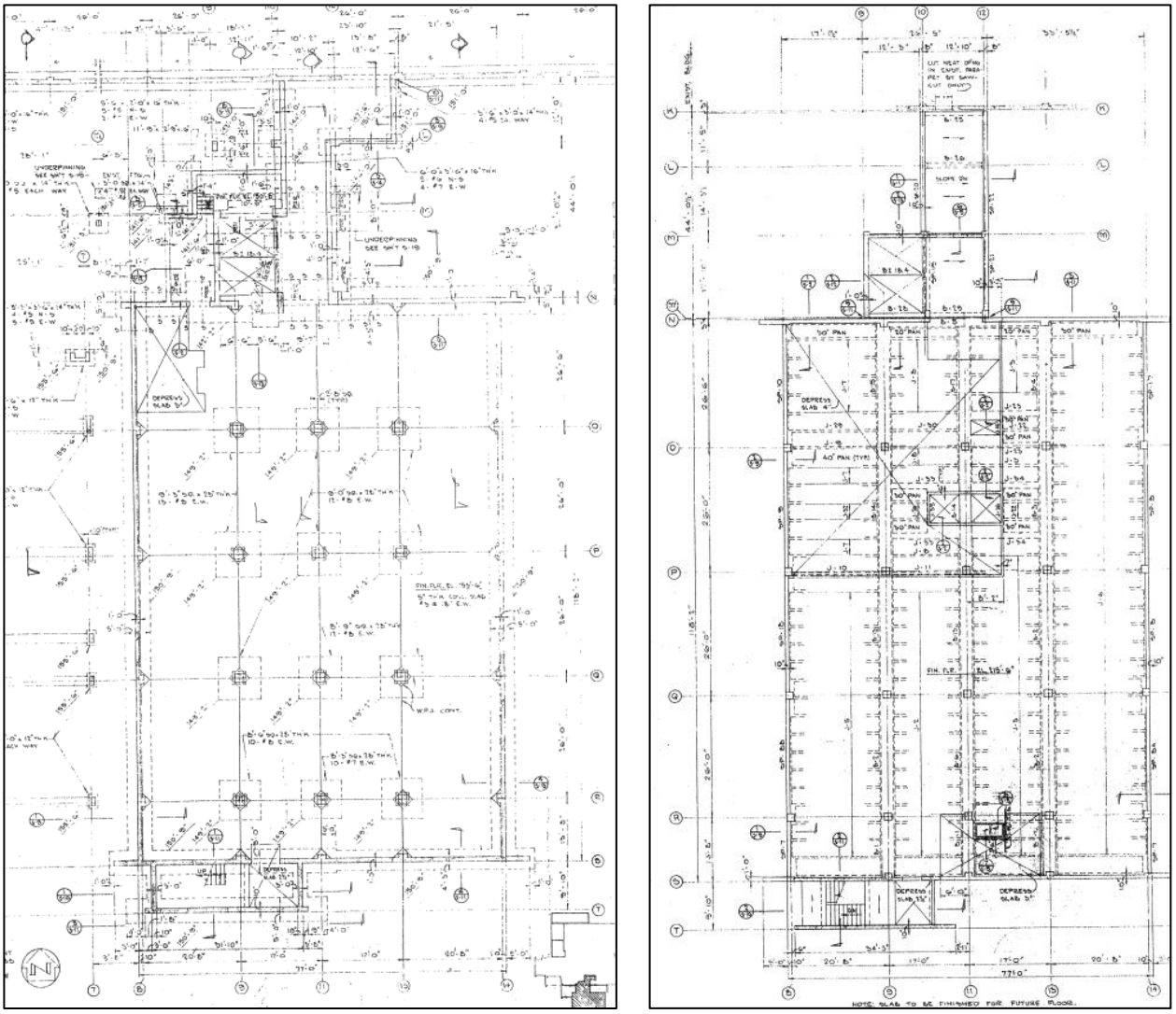


**Figure 6 – Foundation and Basement Plan (Left), Roof Level Plan (Right) (South Tower and Elevator Tower)**

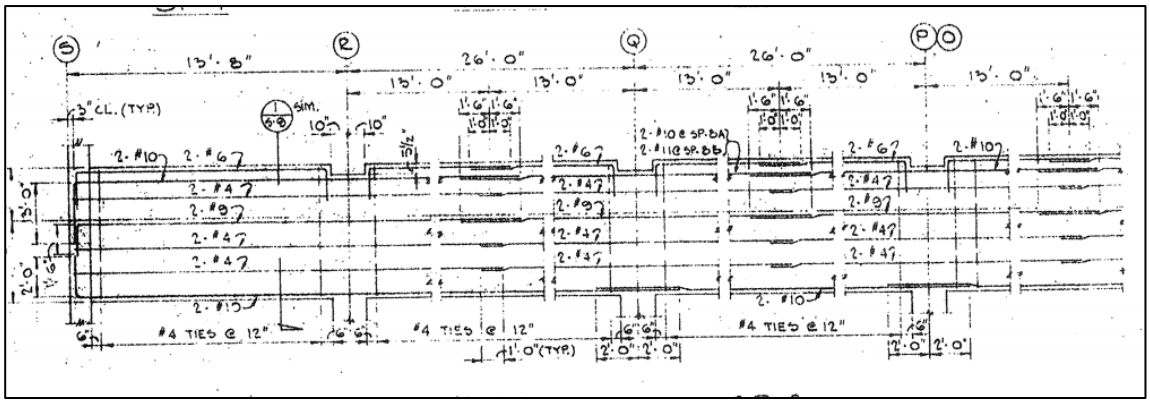



**Figure 7 – Typical Spandrel Elevation (South Tower)**

## 2.2 Additional Site Visit Notes

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

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

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

## 2.3 Building Stability and Qualitative Damage Discussion

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

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

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

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

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

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

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

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

# 3. Seismic Risk Results

## 3.1 Brief Overview of Methods Used and Definitions

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

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

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

## 3.2 Loss Estimates and Implications for Various Planning Alternatives

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

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

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

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

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

**Table A – Probabilistic Seismic Hazard Intensities**

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

**Table B - Seismic Risk Estimates for the North Tower**

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

**Table C - Seismic Risk Estimates for the South Tower**

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

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

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

*3.2.2 Demolish Now (ALT 2)*

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

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

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

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

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

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

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

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

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

If this alternative is pursued, Implications for BCHD include:

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

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

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

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

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

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

### *3.2.4 Seismic Retrofit of the Existing Buildings (ALT 4)*

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

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

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

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

4b. Retrofit Project

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

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

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

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

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

### 3.3 Summary and Recommendation

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

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

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

# 4. Limitations

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

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

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

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

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

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

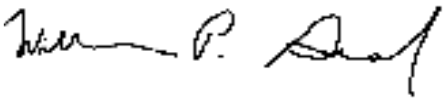
ImageCat warrants that its services are performed with the usual thoroughness and competence of the consulting profession, in accordance with the current standard for professional services, in the location where the services are provided. No other warranty or representation, either expressed or implied,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

- o O o -

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

Sincerely,

**ImageCat, Inc.**



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

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

Attached:

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

# Appendix A – NYA's Seismic Evaluation Report

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

**SEISMIC EVALUATION**
Of

# Beach Cities Health District

**514 North Prospect Avenue & Central Plant**
**Redondo Beach, CA**

Prepared for:

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


Prepared by:

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

March 27, 2018

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## 1.0 BUILDING DESCRIPTION

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

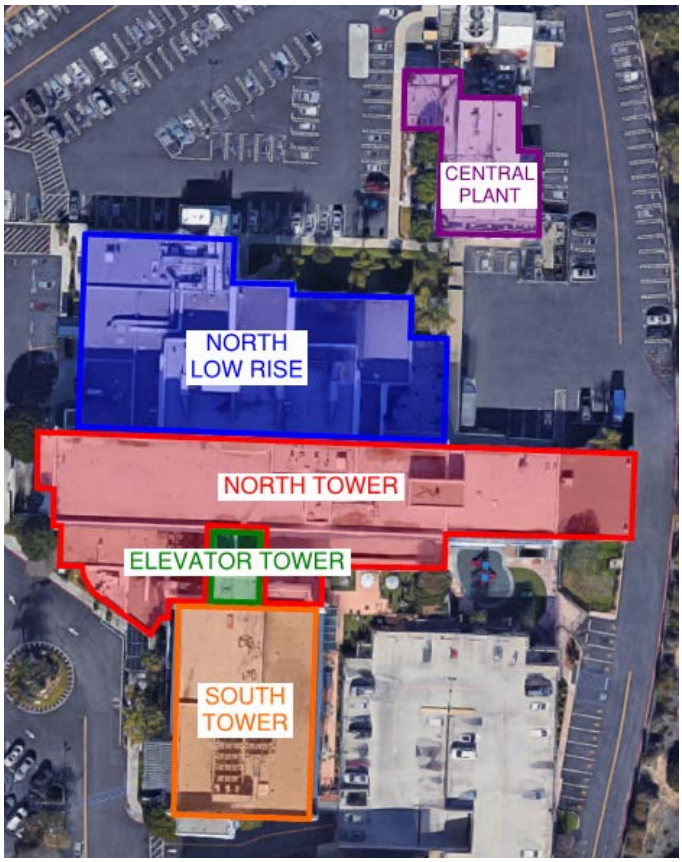


**Figure 1 – Aerial View of 514 North Prospect and Central Plant**

### 1.1 Gravity System

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

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

## 1.2 Lateral System

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


**Figure 2 – View of South Side of North Tower**

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

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

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

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

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

**Figure 3 –View of Central Plant**

# 2.0 SEISMIC EVALUATION

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

**Table 1 – Evaluation Parameters**

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

## 2.1 Identified Deficiencies

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

The identified deficiencies in the north tower include the following:

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

The identified deficiencies in the south tower include the following:

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

The identified deficiencies in the central plant include the following:

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

## 3.0 RECOMMENDATIONS

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

Recommended seismic strengthening for the north tower includes:

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

Recommended seismic strengthening for the south tower includes:

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

Recommended seismic strengthening for the central plant includes:

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

# Appendix B – Fault Descriptions

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

# Quaternary Fault and Fold Database of the United States

## Redondo Canyon fault (Class A) No. 130

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

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

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

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

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

**Physiographic province(s)**
PACIFIC BORDER (offshore)

**Reliability of location**
Poor
Compiled at 1:100,000 scale.

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

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

**Length (km)**
12 km.

**Average strike**
N90°WW

**Sense of movement**
Reverse

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

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

**Paleoseismology studies**

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

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

**Historic earthquake**

**Most recent prehistoric deformation**
latest Quaternary (<15 ka)

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

**Recurrence interval**

**Slip-rate category**
Between 0.2 and 1.0 mm/yr

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

**Date and Compiler(s)**
1998
Jerome A. Treiman, California Geological Survey

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

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

**Physiographic province(s)**
PACIFIC BORDER

**Reliability of location**
Poor
Compiled at 1:250,000 scale.

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

**Average strike**
N57°W (for section)

**Sense of movement**
Right lateral

**Dip**
50° SW. to 90°

**Historic earthquake**

**Most recent prehistoric deformation**
late Quaternary (<130 ka)

**Slip-rate category**
Between 1.0 and 5.0 mm/yr

## Compton thrust fault (Class A) No. 133

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

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

**Synopsis**

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

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

**Name comments**

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

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

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

**County(s) and State(s)**

LOS ANGELES COUNTY, CALIFORNIA
ORANGE COUNTY, CALIFORNIA

**Physiographic province(s)**

PACIFIC BORDER

**Reliability of location**

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

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

**Geologic setting**

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

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

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

**Length (km)**

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

**Average strike**

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

**Sense of movement**

Right lateral

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

**Dip Direction**

NE; SW

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

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

| | |
|---|---|
| **Paleoseismology studies** | Site 127-2: Huntington site by Grant and others (1997 #1366) involved drilling and analyzing 72 CPT borings, spaced between 7 to 30 m apart across the North Branch fault just northwest of Huntington Mesa. Grant and others (1997 #1366) identified at least three and possibly five surface-rupturing earthquakes in the past 11.7 ka. Dates of the events were established using 14C dates from samples collected from continuously cored borings. |
| **Geomorphic expression** | Large-scale features include a line of hills underlain by en echelon anticlinal folds and faults; small- to intermediate-scale features include scarps, pressure ridges, deflected drainages, linear drainages, closed depressions and troughs (Bryant, 1988 #6461). |
| **Age of faulted surficial depos** | Holocene alluvial deposits and soils; late Pleistocene Inglewood Formation; late Pleistocene marine and non-marine terrace deposits; Pleistocene Lakewood Formation (Bryant, 1988 #6461). |
| **Historic earthquake** | latest Quaternary (<15 ka)<br><br>*Comments:* Timing of most recent paleoevent is poorly constrained. Historic events (without surface rupture) include 1933 M6.3 Long Beach earthquake and perhaps 1812 (12/08/1812); no details available on individual or most recent pre-historic events. |
| **Most recent prehistoric defor** | 1,200–3,000 yr<br><br>*Comments:* Recurrence interval reported by Freeman and others (1992 #6469) and Grant and others (1997 #1366). Grant and others (1997 #1366) recognized at least three and as many as five surface-rupturing earthquakes in the past 11.7 ka at the Huntington site. The two oldest Holocene events occurred within approximately 1,200 yr of each other, but at least 3,000 yr passed between early and middle Holocene events. |
| **Recurrence interval** | Between 1.0 and 5.0 mm/yr<br><br>*Comments:* 0.5 mm/yr long-term horizontal geologic slip-rate derived from offset facies in oil well logs (Freeman and others, 1992 #6469); Wesnousky (1986 #5305) and Working Group on California Earthquake Probabilities (1995 #4945) assume 1.0 mm/yr; Clark and others (1984 #2876) reported 0.6–1.2 mm/yr vertical slip rate at Bolsa Chica Mesa which may not be representative of total slip on the deeper seismogenic structure. |
| **Slip-rate category** | 1999 |
| **Date and Compiler(s)** | Jerome A. Treiman, California Geological Survey<br>Matthew Lundberg, California Geological Survey |

# Appendix C – Earthquake Risk Glossary

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

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

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

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

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

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

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

Modified Mercalli Intensity (MMI) (abridged)

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

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

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

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

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

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

**Regularity**

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

**Residual Risk**

The remaining risk after risk management techniques have been applied.

**Response Spectrum**

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

**Return Period**

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

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

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

$T$ = Average return period [years]

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

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

**Richter Scale**

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

**Risk**

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

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

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

# Appendix D – Qualifications

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

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

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

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

*Relevant Publications include:*

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

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

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

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

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

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

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

## Vice President of Engineering, ImageCat, Inc.

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

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

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

*Publications include:*

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

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

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

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

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

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

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

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

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

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

# Appendix E – Seismic Design Code Objectives

## Seismic Design Code Objectives for New Buildings

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

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

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

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

## Seismic Evaluation and Retrofit Standards for Existing Buildings

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

# Attachment 2

# The Healthy Living Campus

## Evaluation of Development Strategy: Seismic Retrofitting Alternative

June 12, 2020

CAIN BROTHERS
A division of
KeyBanc Capital Markets

BCHD Beach Cities Health District

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# Situational Background

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

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

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

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

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

# Key Assumptions

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

# CBRE Analysis - 514 Q&D Rehabilitation Feasibility

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

**CBRE/Manhattan Realty Analysis (1)**

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

**Notes:**

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

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

# Cain Brothers' Analysis

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

# Analysis of BCHD Projected Cash Flow and Targeted 514 Revenue

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

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

# Analysis of BCHD Cash Reserves

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

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

**Notes:**

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

# Analysis of Retrofitted 514 Building Rental Rates

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

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

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

# Attachment 3

**RESOLUTION NO. 2010-10-PCR-035**

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

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

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

B-66

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Douglas Kim, Chair
Planning Commission
City of Redondo Beach

ATTEST:

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

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

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

NOES: None

ABSENT: Commissioner Biro

Aaron Jones, Planning Director

APPROVED AS TO FORM:

City Attorney's Office

# Administrative Report

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

**AGENDA ITEM:** 12 (PUBLIC HEARINGS)

**PROJECT LOCATION:** 514 NORTH PROSPECT AVENUE

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

**CASE NUMBER:** 2010-10-PC-023

**APPLICANT'S NAME:** SILVERADO SENIOR LIVING

**APPLICANT'S REQUEST AS ADVERTISED:**

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

**DEPARTMENT'S RECOMMENDATION:**

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

**DEPARTMENT'S ANALYSIS OF REQUEST:**

**BACKGROUND/EXISTING CONDITIONS:**

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

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

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

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

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

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

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

**CURRENT REQUEST:**

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

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

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

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

## EVALUATION OF REQUEST:

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

### CONDITIONAL USE PERMIT

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

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

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

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

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

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

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

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

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

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

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

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

PLANNING COMMISION DESIGN REVIEW

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

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

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

## ENVIRONMENTAL STATUS:

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

## FINDINGS:

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

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

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

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

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

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

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

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

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

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

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

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

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

**CONDITIONS:**

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

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

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

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

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

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

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

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

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

Prepared by:

Anita Kroeger
Associate Planner

Approved by:

Aaron Jones
Planning Director

attachments

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

# CITY OF REDONDO BEACH

## EXEMPTION DECLARATION
## PURSUANT TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

**DATE:** October 21, 2010

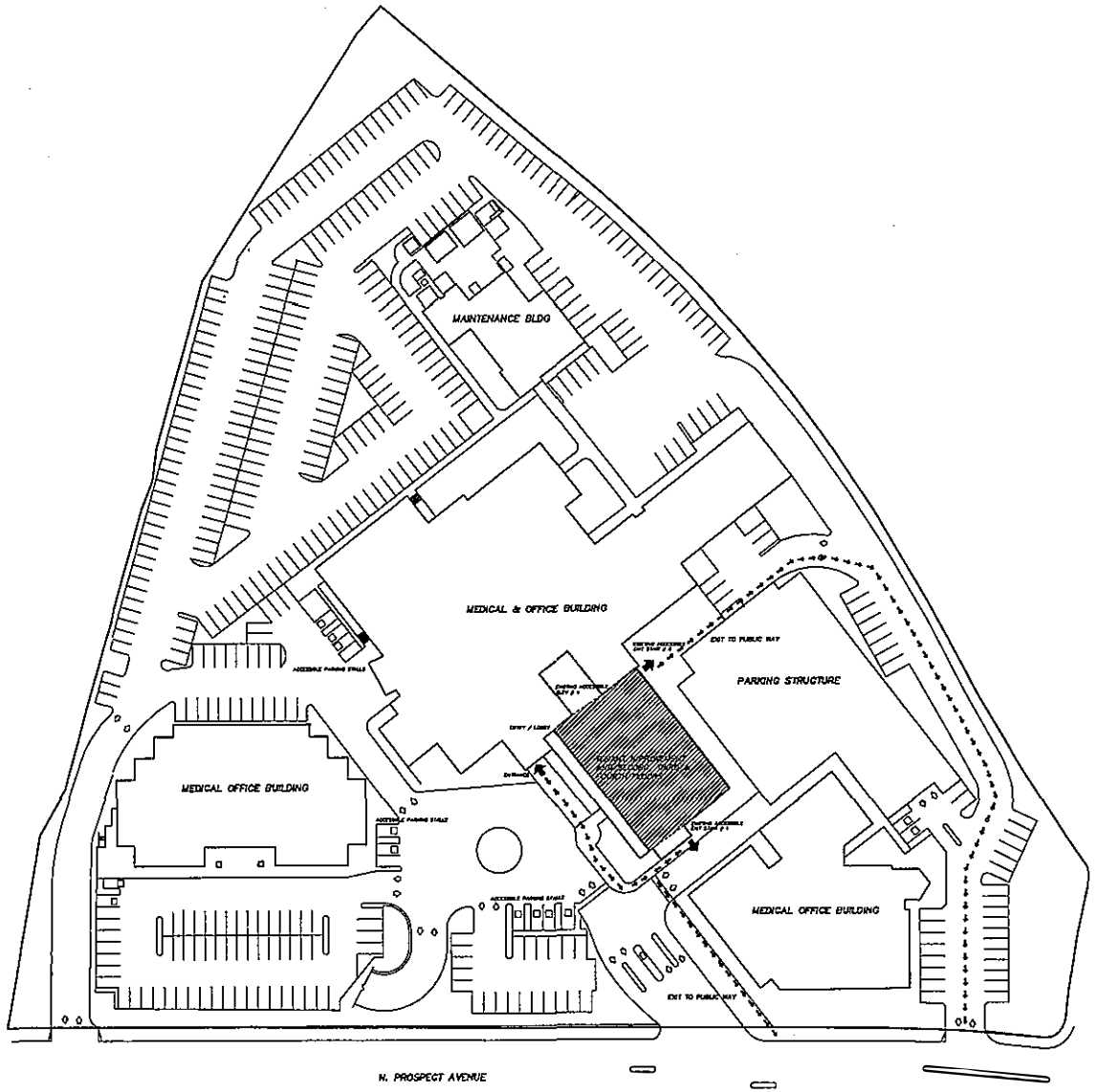
**PROJECT ADDRESS:** 514 North Prospect Avenue

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

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

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

Anita Kroeger
Associate Planner




SITE PLAN NOTES

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

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

KEY PLAN

IRWIN PANCAKE ARCHITECTS
ARCHITECTURE
PLANNING
CONSULTING
345 FISCHER AVENUE
SUITE B-12
COSTA MESA
CALIFORNIA, 92626
TEL 714-556-3774
FAX 714-556-1572
www.irwin-pancake.com

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

SITE PLAN

A-0.1

# Attachment 4

**RESOLUTION NO. 2006-05-PCR-020**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

ATTEST:

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

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

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

NOES: None

ABSENT: Commissioner Zager

Randy Berler, Planning Director

APPROVED AS TO FORM:

Assistant City Attorney

# Administrative Report

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

**AGENDA ITEM:** 10 (PUBLIC HEARINGS)

**PROJECT LOCATION:** 514 NORTH PROSPECT AVENUE

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

**CASE NUMBER:** 2006-04-PC-017

**APPLICANT'S NAME:** SILVERADO SENIOR LIVING

**APPLICANT'S REQUEST AS ADVERTISED:**

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

**DEPARTMENT'S RECOMMENDATION:**

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

**DEPARTMENT'S ANALYSIS OF REQUEST:**

**BACKGROUND/EXISTING CONDITIONS:**

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

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

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

## CURRENT REQUEST:

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

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

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

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

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

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

## EVALUATION OF REQUEST:

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

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

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

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

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

## ENVIRONMENTAL STATUS:

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

## FINDINGS:

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

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

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

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

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

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

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

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

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

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

## CONDITIONS:

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

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

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

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

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

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

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

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

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

Prepared by:

Anita Kroeger
Senior Planner

Approved by:

Randy Berler
Planning Director

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# Appendix C Mitigation Monitoring and Reporting Program

# Appendices

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October 2024 | Mitigation Monitoring and Reporting Program
State Clearinghouse No. 2023050732

# Redondo Beach Focused General Plan Update, Zoning Ordinance Update and Local Coastal Program Amendment

City of Redondo Beach

*Prepared for:*

**City of Redondo Beach**
Contact: Marc Wiener, Community Development Director
Sean Scully, Planning Manager
415 Diamond Street
Redondo Beach, California 90277
310.318.0637

*Prepared by:*

**PlaceWorks**
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# Table of Contents



## *List of Tables*

# Table of Contents

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# 1. Introduction

## 1.1 PURPOSE OF MITIGATION MONITORING AND REPORTING PROGRAM

The City of Redondo Beach (City) is the lead agency for the proposed Redondo Beach Focused General Plan Update, Zoning Ordinance Updates, and Local Coastal Program Amendment (proposed project) and has developed this Mitigation Monitoring and Reporting Program (MMRP) as a vehicle for monitoring and ensuring the successful implementation of mitigation measures outlined in the City of Redondo Beach proposed Redondo Beach Focused General Plan Update, Zoning Ordinance Updates, and Local Coastal Program Amendment Program Environmental Impact Report (PEIR), State Clearinghouse No. 2023050732. As the lead agency, the City is responsible for implementing the MMRP, which has been prepared in conformance with Section 21081.6 of the California Public Resources Code, as follows:

> (a) When making findings required by paragraph (1) of subdivision (a) of Section 21081 or when adopting a mitigated negative declaration pursuant to paragraph (2) of subdivision (c) of Section 21080, the following requirements shall apply:
>
> (1) The public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation. For those changes which have been required or incorporated into the project at the request of a responsible agency or a public agency having jurisdiction by law over natural resources affected by the project, that agency shall, if so requested by the lead or responsible agency, prepare and submit a proposed reporting or monitoring program.
>
> (2) The lead agency shall specify the location and custodian of the documents or other material which constitute the record of proceedings upon which its decision is based.

The MMRP consists of mitigation measures that avoid, reduce, and/or fully mitigate potential environmental impacts. The mitigation measures have been identified and recommended through preparation of the PEIR and drafted to meet the requirements of Public Resources Code, Section 21081.6.

# 1.2 PROJECT CHARACTERISTICS

## 1.2.1 Project Location

The City of Redondo Beach is in the South Bay region of Los Angeles County. It is bordered to the north by Hermosa Beach, Manhattan Beach, Hawthorne, and El Segundo; to the east by Torrance and Lawndale; to the south by the Palos Verdes Peninsula; and to the west by the Pacific Ocean. The southwestern portion of the city stretches along approximately 2.6 miles of coastline between the border of Hermosa Beach to the north and Torrance to the south. Interstate and regional access are provided by Interstate 405 (I-405), which runs in a general north-south direction and passes through the northern portion of the city; State Route 107 (SR-107), a north-south state highway that borders the northeastern portion of the city; and Pacific Coast Highway (SR-1), a north-south highway that bisects the southern portion of the city.

## 1.2.2 Project Description

### Project Summary

The General Plan represents the community's vision of its future; it also serves as the blueprint guiding the City. The City will use the goals and policies of the General Plan as a basis from which to make land use, housing, mobility, infrastructure (capital improvements), and open space and parks decisions. Redondo Beach has selected the year 2050 as its planning horizon. The City is updating five of the State-required elements that make up the General Plan:

- **Land Use.** Key components of the update to this element include the policy framework, which includes the goals and policies that guide land-use decisions and help shape future development and public investment; the land use plan, including the land use map and designations some of which implement the housing sites; the focus areas and special policy areas discussions; and the implementation measures.

- **Open Space and Conservation.** Key components of the update to this element include goals and policies that reconcile competing demands on open space resources, and emphasize the role parks, public spaces, recreation facilities and programs, community events, and the preservation of natural resources play in economic development, land use, sustainability, climate adaptation, infrastructure, and transportation goals.

- **Safety.** Key components of the update to this element include identifying natural and human-caused hazards and evaluating how these hazards are projected to change in the future. Goals and policies aim to minimize the effects of these hazards. For the Redondo Beach General Plan Update, the Environmental Hazards/Natural Hazards Element will become the state-mandated safety element.

- **Noise.** Key components of the update to this element include assessing the community's existing noise environment and providing goals and policies and implementation actions to proactively reduce noise and land use compatibility problems considerate of future noise contours.

- **Zoning Ordinance and Zoning Ordinance for the Coastal Zone.** Updates to the City's Zoning Ordinance and Zoning Ordinance for the Coastal Zone will include modifications for consistency with the

proposed General Plan, recently adopted Housing Element, and in the context of State laws such as Senate Bills 35 and 330.

- **Local Coastal Amendment.** To implement the changes proposed by the Focused General Plan Update and the proposed Zoning Ordinance Update within the coastal zone, the City must also amend portions of both the Land Use Plan (LUP) and Implementation Plan (IP) components of its Local Coastal Program (LCP). Proposed changes to the LUP include updates to the Land Use Map consistent with the Land Use Map in the Focused General Plan Update.

Proposed changes to the IP will include updates to the Zoning Map within the Coastal Zone to implement the Focused General Plan Update and updates to the Zoning Code for the Coastal Zone. Proposed changes to the Zoning Code for the Coastal Zone are consistent with the proposed Zoning Ordinance Update, except where changes would conflict with the provisions of the California Coastal Act. The Zoning Code changes related to the General Plan Update for areas the Coastal Zone do not include any changes that would impact coastal resource requirements, including provisions for off-street parking in parking constrained areas near the shoreline. In addition, development in the coastal zone will remain subject to current coastal development permit (CDP) procedures to ensure protection of coastal resources.

Each General Plan element contains a number of goal statements and related policy statements for each stated goal. Additionally, details for implementing policies in the General Plan are contained in the form of Implementation Actions. Updates to these elements are accompanied by associated revisions to the City's Zoning Ordinance and Local Coastal Program (LCP) needed to make them consistent and implement the updated goals and policies. The entirety of the updates to the General Plan, Zoning Ordinance, and LCP updates constitutes the "proposed project." Although the General Plan is composed of individual sections, or "elements," that individually address a specific area of concern, the General Plan embodies a comprehensive and integrated planning approach for the City.

## Proposed General Plan and Buildout

Buildout projections represent development likely to occur based on past trends and anticipated levels of density and intensity for each land use category anticipated by the 2050 planning horizon of the proposed General Plan, and compares growth to existing conditions as summarized in Chapter 3, *Project Description*, Table 3-1, of the PEIR and below in Table1. Table 1 shows the potential for housing units, nonresidential building square footage, and jobs that are likely to be generated by the proposed Land Use Plan (see also Figure 3-5 of the PEIR and Appendix B, *Buildout Methodology Memorandum*, Table 8. *Proposed Land Use Plan Anticipated Density and Intensity*). As shown in Table 1, the proposed land uses would result in an increase of 4,956 residential dwelling units (16 percent), 8,667 residents (12 percent), 5,681,999 square feet of nonresidential development (48 percent), and 7,989 jobs (28 percent) compared to existing conditions.

Table 1 Buildout Statistical Summary

| | Existing Conditions | Proposed Project |
|---|---|---|
| Dwelling Units | 30,431 | 35,387 |
| Population | 70,311 | 78,978 |
| Nonresidential Square Footage | 11,826,277 | 17,508,276 |
| Employment | 28,638 | 36,627 |

Source: Appendix B, Buildout Methodology Memorandum.

## 1.3 ENVIRONMENTAL IMPACTS

The level of significance is identified for each impact in this Draft Program Environmental Impact Report (DEIR). Although the criteria for determining significance are different for each topic area, the environmental analysis applies a uniform classification of the impacts based on definitions consistent with CEQA and the CEQA Guidelines:

- **No impact.** The project would not change the environment.
- **Less than significant.** The project would not cause any substantial, adverse change in the environment.
- **Less than significant with mitigation incorporated.** The EIR includes mitigation measures that avoid substantial adverse impacts on the environment.
- **Significant and unavoidable.** The project would cause a substantial adverse effect on the environment, and no feasible mitigation measures are available to reduce the impact to a less than significant level.

### 1.3.1 Impacts Found Not to Be Significant

- Aesthetics
- Agricultural and Forestry Resources
- Biological Resources
- Hazards and Hazardous Materials
- Land Use and Planning
- Mineral Resources
- Public Services
- Recreation
- Utilities and Service Systems

### 1.3.2 Potentially Significant Adverse Impacts That Can Be Mitigated, Avoided, or Substantially Lessened

- Energy
- Geology and Soils
- Tribal Cultural Resources
- Transportation

### 1.3.3 Significant and Unavoidable Impacts

- Air Quality
- Cultural Resources
- Energy
- Greenhouse Gas Emissions
- Land Use
- Noise
- Population and Housing
- Transportation

# 1. Introduction

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# 2. Mitigation Monitoring Process

## 2.1 MITIGATION MONITORING PROGRAM ORGANIZATION

Overall MMRP management is the responsibility of the City of Redondo Beach. The City's technical consultants (CEQA consultant, etc.) may perform related monitoring tasks under the direction of the environmental monitor (i.e., the qualified/professional expert in charge of monitoring and/or implementing mitigation) if they are contracted by the City.

### 2.1.1 City of Redondo beach

As the lead agency, the City is responsible for the review of all monitoring reports, enforcement actions, and document disposition. The City will rely on information provided by individual monitors (*e.g.,* CEQA consultant, etc.) as accurate and up to date, and will field check mitigation measure status, as required.

### 2.1.2 Mitigation Monitoring Team

The mitigation monitoring team, consisting of the designated Project Manager (e.g., Community Development Director) and Technical Consultants (CEQA consultant, etc.) are responsible for monitoring implementation and compliance with all adopted mitigation measures and conditions of approval. A major portion of the team's work will entail in-field monitoring and compliance report preparation. Implementation disputes are brought to the Project Manager, and any appeals would go to the City Manager and ultimately the City Council.

### 2.1.3 Monitoring Team

The following summarizes key positions in the MMRP and their respective functions:

- **Project Manager:** Responsible for coordination of mitigation monitoring team, technical consultants, report preparation, and overall program administration and document/report clearinghouse.
- **Construction Contractor:** Responsible for coordination of mitigation monitoring team; technical consultants; report preparation; and implementation the monitoring program, including overall program administration, document/report clearinghouse, and first phase of dispute resolution.
- **Technical Consultants:** Responsible for monitoring in respective areas of expertise (CEQA consultant, project engineer, noise analyst/specialist). Report directly to the Project Manager.

### 2.1.4 Recognized Experts

The use of recognized experts on the monitoring team is required to ensure compliance with scientific and engineering mitigation measures. The mitigation monitoring team's recognized experts assess compliance with required mitigation measures, and recognized experts from responsible agencies consult with the Project Manager regarding disputes.

## 2.2 DISPUTE RESOLUTION

If the monitoring team determines that a mitigation measure, in the opinion of the monitor, has not been implemented or has not been implemented correctly, the problem will be brought before the Project Manager for resolution. The decision of the Project Manager is final unless appealed to the City Manager. The Project Manager will have the authority to issue stop-work order until the dispute is resolved.

## 2.3 ENFORCEMENT

Public agencies may enforce conditions of approval through their existing police powers using stop-work orders, fines, infraction citations, revocation of approval/permits, or in some cases, notice of violation for tax purposes.

# 3. Mitigation Monitoring Requirements

## 3.1 PREMONITORING MEETING

A premonitoring meeting will be scheduled to review mitigation measures, implementation requirements, schedule conformance, and mitigation monitoring team responsibilities. At such meetings, the monitoring team rules are established, the entire mitigation monitoring program is presented, and any misunderstandings are resolved.

## 3.2 CATEGORIZED MITIGATION MEASURES/MATRIX

Project-specific mitigation measures have been categorized in matrix format, as shown in Table 2, *Mitigation Monitoring Requirements*. The matrix identifies the environmental factor, specific mitigation measures, schedule, and responsible monitor. The mitigation matrix will serve as the basis for scheduling the implementation of and compliance with all mitigation measures.

## 3.3 IN-FIELD MONITORING

Project monitors and technical subconsultants shall exercise caution and professional practices at all times when monitoring implementation of mitigation measures. Protective wear (*e.g.,* hard hat, glasses) shall be worn at all times in construction areas. Injuries shall be immediately reported to the mitigation monitoring team.

## 3.4 DATABASE MANAGEMENT

All mitigation monitoring reports, letters, and memos shall be prepared utilizing electronic software, such as Microsoft Word, Adobe, etc.

## 3.5 COORDINATION WITH CONTRACTORS

The construction manager is responsible for coordination of contractors and for contractor completion of required mitigation measures.

## 3.6 LONG-TERM MONITORING

Long-term monitoring related to several mitigation measures will be required, including review of project plans to ensure compliance with the most recent versions of the California Building Code and California Fire Code. Post-construction fire inspections are conducted on a routine basis by the City of Redondo Beach Fire Department.

# 3. Mitigation Monitoring Requirements

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Table 2 Mitigation Monitoring Requirements

| | Mitigation Measure | Responsibility for Implementation | Timing | Responsibility for Monitoring | Monitor (Signature Required) (Date of Compliance) |
|---|---|---|---|---|---|
| AIR QUALITY | | | | | |
| AQ-1 | Prior to discretionary approval by the City of Redondo Beach for development projects subject to CEQA (California Environmental Quality Act) review (i.e., nonexempt projects), project applicants shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts to the City of Redondo Beach Planning Division for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (South Coast AQMD) methodology for assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the South Coast AQMD–adopted thresholds of significance, the City of Redondo Beach Building & Safety Division shall require feasible mitigation measures to reduce air quality emissions. Potential measures shall be incorporated as conditions of approval for a project and may include, but are not limited to the following:<br>• Require fugitive dust control measures that exceed South Coast Air Quality Management District's Rule 403, such as:<br>  • Requiring use of nontoxic soil stabilizers to reduce wind erosion.<br>  • Applying water every four hours to active soil disturbing activities.<br>  • Tarping and/or maintaining a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.<br>• Using construction equipment rated by the United States Environmental Protection Agency as having Tier 4 interim or higher exhaust emission limits.<br>• Ensuring construction equipment is properly serviced and maintained to the manufacturer's standards.<br>• Limiting nonessential idling of construction equipment to no more than five consecutive minutes.<br>• Using Super-Compliant VOC paints for coating of architectural surfaces whenever possible. A list of Super-Compliant architectural coating manufactures can be found on the South Coast Air Quality Management District's website at: https://www.aqmd.gov/home/rules-compliance/compliance/vocs/architectural-coatings/super-compliant-coatings. | Future Project Applicants | Prior to Discretionary Approval | City of Redondo Beach Community Development Department | |

# 3. Mitigation Monitoring Requirements

Table 2 Mitigation Monitoring Requirements

| | Mitigation Measure | Responsibility for Implementation | Timing | Responsibility for Monitoring | Monitor (Signature Required) (Date of Compliance) |
|---|---|---|---|---|---|
| AQ-2 | Prior to discretionary approval by the City of Redondo Beach for development projects subject to CEQA (California Environmental Quality Act) review (i.e., nonexempt projects), project applicants shall prepare and submit a technical assessment evaluating potential project operation-phase-related air quality impacts to the City of Redondo Beach Planning Division for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (South Coast AQMD) methodology in assessing air quality impacts. If operation-related air pollutants are determined to have the potential to exceed the South Coast AQMD–adopted thresholds of significance, the City of Redondo Beach Planning Division shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during operational activities. The identified measures shall be included as part of the conditions of approval. Possible mitigation measures to reduce long-term emissions could include, but are not limited to the following:<br>• For site-specific development that requires refrigerated vehicles, the construction documents shall demonstrate an adequate number of electrical service connections at loading docks for plug-in of the anticipated number of refrigerated trailers to reduce idling time and emissions.<br>• Applicants for manufacturing and light industrial uses shall consider energy storage and combined heat and power in appropriate applications to optimize renewable energy generation systems and avoid peak energy use.<br>• Site-specific developments with truck delivery and loading areas and truck parking spaces shall include signage as a reminder to limit idling of vehicles while parked for loading/unloading in accordance with California Air Resources Board Rule 2845 (13 CCR Chapter 10 § 2485).<br>• Provide changing/shower facilities as specified in the Nonresidential Voluntary Measures of CALGreen.<br>• Provide bicycle parking facilities per the Nonresidential Voluntary Measures and Residential Voluntary Measures of CALGreen.<br>• Provide facilities to support electric charging stations per the Nonresidential Voluntary Measures and Residential Voluntary Measures of CALGreen.<br>• Applicant-provided appliances shall be Energy Star–certified appliances or appliances of equivalent energy efficiency (e.g., dishwashers, refrigerators, clothes washers, and dryers). Installation of Energy Star–certified or equivalent appliances shall be verified by the City during plan check. | Future Project Applicants | During Plan Check and Prior to Discretionary Approval | City of Redondo Beach Community Development Department | |

Table 2 Mitigation Monitoring Requirements

| | Mitigation Measure | Responsibility for Implementation | Timing | Responsibility for Monitoring | Monitor (Signature Required) (Date of Compliance) |
|---|---|---|---|---|---|
| AQ-3 | Industrial and Warehouse Development Health Risk Assessments. Prior to discretionary approval by the City of Wildomar, project applicants for new industrial or warehousing development projects that 1) have the potential to generate 100 or more diesel truck trips per day or have 40 or more trucks with operating diesel-powered transport refrigeration units, and 2) are within 1,000 feet of a sensitive land use (*e.g.,* residential, schools, hospitals, nursing homes), as measured from the property line of the project to the property line of the nearest sensitive use, shall submit an operational health risk assessment (HRA) to the City of Wildomar Planning Department for review and approval. The HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment and the South Coast AQMD. If the HRA shows that the incremental cancer risk and/or noncancer hazard index exceeds the respective threshold, as established by the South Coast AQMD at the time a project is considered, the project applicant will be required to identify best available control technologies for toxics (T BACTs) and appropriate enforcement mechanisms and demonstrate that they are capable of reducing potential cancer and noncancer risks to an acceptable level. T-BACTs may include but are not limited to restricting idling on-site or electrifying warehousing docks to reduce diesel particulate matter, or requiring use of newer equipment and/or vehicles. T-BACTs identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site plan. | Future Project Applicants | Prior to Discretionary Approval for Industrial and Warehouse Developments | City of Redondo Beach Community Development Department | |
| CULTURAL RESOURCES | | | | | |
| CUL-1 | Historical Resources Assessment. For discretionary projects that involve construction activities that may adversely impact potentially eligible historical resources (i.e., structures 45 years or older), a historical resources assessment shall be performed by an architectural historian or a historian who meets the Secretary of the Interior's Professionally Qualified Standards (PQS) in architectural history or history. The assessment shall include a records search to determine if any resources that may be potentially affected by the project have been previously recorded, evaluated, and/or designated in the National Register of Historic Places, California Register of Historic Resources (CRHR), or local register of historic resources. Following the records search, the qualified historian or architectural historian shall conduct a reconnaissance-level and/or intensive-level survey in accordance with the California Office of Historic Preservation guidelines to identify any previously unrecorded potential historical resources that may be potentially affected by the proposed project. Pursuant to the definition of a historical resource under CEQA, potential historical resources shall be | Future Project Applicants and Qualified Cultural Resources Specialist | Prior to Issuance of Demolition, Grading, and/or Building Permits. | City of Redondo Beach Community Development Department | |

# 3. Mitigation Monitoring Requirements

Table 2 Mitigation Monitoring Requirements

| | Mitigation Measure | Responsibility for Implementation | Timing | Responsibility for Monitoring | Monitor (Signature Required) (Date of Compliance) |
|---|---|---|---|---|---|
| | evaluated under a developed historic context. The assessment shall provide the historic context, methods, results, and recommendations for appropriate findings. The assessment shall be provided to the Director of the Community Development Department for concurrence as to the appropriate mitigation for historic resources. | | | | |
| CUL-2 | **Cultural Resources Assessment.** For discretionary projects that involve ground-disturbing activities during construction on areas where no previous ground disturbance or excavation has occurred, or ground-disturbing activities would occur in native soil, a site-specific cultural resources study shall be completed prior to project approval. The study shall include records searches of the California Historical Resources Information System and the Sacred Lands File maintained by the Native American Heritage Commission. The records searches shall determine if the proposed project has been previously surveyed for archaeological resources, identify and characterize the results of previous cultural resource surveys, and disclose any cultural resources that have been recorded and/or evaluated.<br>If the records search identifies a sensitivity for archaeological resources, an archaeological resources assessment shall be performed under the supervision of an archaeologist that meets the Secretary of the Interior's PQS in either prehistoric or historic archaeology. If the archaeological assessment indicates the area to be of medium sensitivity for archaeological resources, an archaeologist who meets the PQS shall be retained on an on-call basis.<br>If the archaeological assessment indicated the area to be highly sensitive for archaeological resources, a qualified archaeologist shall monitor all ground-disturbing construction and pre-construction activities. | Future Project Applicants and Professional Archaeologist | Prior to Issuance of a Grading Permit and during Ground-Disturbing Activities | City of Redondo Beach Community Development Department | |

# 3. Mitigation Monitoring Requirements

Table 2 Mitigation Monitoring Requirements

| | Mitigation Measure | Responsibility for Implementation | Timing | Responsibility for Monitoring | Monitor (Signature Required) (Date of Compliance) |
|---|---|---|---|---|---|
| CUL-3 | **All Projects.** If cultural resources are discovered during ground-disturbing activities, all ground-disturbing activities within 50 feet of the find shall be halted until a meeting is convened between the developer, archaeologist, tribal representatives, and the Director of the Community Development Department, or their assigned designee. At the meeting, the significance of the discoveries shall be discussed and after consultation with the tribal representatives, developer, and archaeologist, a decision shall be made, with the concurrence of the Director of the Community Development Department, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the cultural resources. | Future Project Applicants and Professional Archaeologist | During Ground-Disturbing Activities | City of Redondo Beach Community Development Department | |
| GEOLOGY AND SOILS | | | | | |
| GEO-1 | **Low-to-High Sensitivity**. Prior to issuance of a grading permit for discretionary projects that involve ground disturbance in previously undisturbed areas mapped with "low-to-high" paleontological sensitivity, the project applicant shall consult with a geologist or paleontologist to confirm whether the grading would occur at depths that could encounter highly sensitive sediments for paleontological resources. If confirmed that underlying sediments may have sensitivity, a qualified paleontologist shall be retained to develop and implement a Paleontological Resources Impact Mitigation Plan. The paleontologist shall have the authority to halt construction during ground disturbing activities as outlined in Mitigation Measure GEO-2. | Future Project Applicants and Licensed Professional Engineer | Prior to Issuance of a Grading Permit and during Ground-Disturbing Activities | City of Redondo Beach Building and Safety Department and Community Development Department | |
| GEO-2 | **All Projects.** In the event of any fossil discovery, regardless of depth or geologic formation, ground disturbing activities shall halt within a 50-foot radius of the find until its significance can be determined by a qualified paleontologist. Significant fossils shall be recovered, prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility in accordance with the standards of the Society of Vertebrate Paleontology. The most likely repository is the Natural History Museum of Los Angeles County. The repository shall be identified, and a curatorial arrangement shall be signed as part of the Paleontological Impact Mitigation Plan (GEO-1) and prior to collection of the fossils. | Future Project Applicants and Certified Paleontologist | Prior to Issuance of a Grading Permit | City of Redondo Beach Community Development Department | |

# 3. Mitigation Monitoring Requirements

Table 2 Mitigation Monitoring Requirements

| | Mitigation Measure | Responsibility for Implementation | Timing | Responsibility for Monitoring | Monitor (Signature Required) (Date of Compliance) |
|---|---|---|---|---|---|
| GREENHOUSE GAS EMISSIONS | | | | | |
| GHG-1 | The City of Redondo Beach shall prepare an update Climate Action Plan (CAP) to achieve the greenhouse gas (GHG) reduction targets of Senate Bill (SB) 32 for the year 2030 and chart a trajectory to achieve the long-term GHG reduction goal set by Assembly Bill (AB) 1279. The updated CAP shall be completed within three years of certification of the General Plan EIR. The updated CAP shall be updated every five years to ensure the City is monitoring the plan's progress toward achieving the City's GHG reduction target and to require amendment if the plan is not achieving a specified level. The update shall consider a trajectory consistent with the GHG emissions reduction goal established under SB 32 for year 2030, AB 1279 for year 2045, and the latest applicable statewide legislative GHG emission reduction that may be in effect at the time of the CAP update.<br>The CAP update shall include the following:<br>• GHG inventories of existing and forecast year GHG levels.<br>• Tools and strategies for reducing GHG emissions to achieve the GHG reduction goals of Senate Bill 32 for year 2030.<br>• Tools and strategies for reducing GHG emissions to ensure a trajectory with the long-term GHG reduction goal and carbon neutrality goal for year 2045 of AB 1279.<br>• Plan implementation guidance that includes, at minimum, the following components consistent with the proposed updated CAP:<br>  • Administration and Staffing<br>  • Finance and Budgeting<br>  • Timelines for Measure Implementation<br>  • Community Outreach and Education<br>  • Monitoring, Reporting, and Adaptive Management<br>Tracking Tools. | City of Redondo Beach Public Works and Engineering Department and Community Development Department | During Future Updates of the Subregional CAP | City of Redondo Beach Public Works and Engineering Department and Community Development Department | |

# 3. Mitigation Monitoring Requirements

Table 2 Mitigation Monitoring Requirements

| | Mitigation Measure | Responsibility for Implementation | Timing | Responsibility for Monitoring | Monitor (Signature Required) (Date of Compliance) |
|---|---|---|---|---|---|
| NOISE | | | | | |
| N-1 | **Construction Noise Measures.** Construction contractors shall implement the following measures for construction activities conducted in the City of Redondo Beach. Construction plans submitted to the City shall identify these measures on demolition, grading, and construction plans. The City of Redondo Beach Planning and Building Divisions shall verify that grading, demolition, and/or construction plans submitted to the City include these notations prior to issuance of demolition, grading, and/or building permits.<br>• During the entire active construction period, equipment and trucks used for project construction shall use the best-available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds), wherever feasible.<br>• Impact tools (e.g., jack hammers and hoe rams) shall be hydraulically or electrically powered wherever possible. Where the use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used along with external noise jackets on the tools.<br>• Stationary equipment, such as generators and air compressors, shall be located as far as feasible from nearby noise-sensitive uses.<br>• Stockpiling shall be located as far as feasible from nearby noise-sensitive receptors.<br>• Construction traffic shall be limited, to the extent feasible, to approved haul routes established by the City Planning, Engineering, and Building Divisions.<br>• At least 10 days prior to the start of construction activities, a sign shall be posted at the entrance(s) to the job site, clearly visible to the public, that includes permitted construction days and hours, as well as the telephone numbers of the City's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint. If the authorized contractor's representative receives a complaint, he/she shall investigate, take appropriate corrective action, and report the action to the City.<br>• Signs shall be posted at the job site entrance(s), within the on-site construction zones, and along queueing lanes (if any) to reinforce the prohibition of unnecessary engine idling. All other equipment shall be turned off if not in use for more than 5 minutes.<br>• During the entire active construction period and to the extent feasible, the use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only. The construction manager shall use smart back- | Future Project Applicants and Construction Contractor | Prior to Issuance of Demolition, Grading, and/or Building Permits and During Construction Activities | City of Redondo Beach Community Development Department and Building and Safety Department | |

# 3. Mitigation Monitoring Requirements

Table 2 Mitigation Monitoring Requirements

| | Mitigation Measure | Responsibility for Implementation | Timing | Responsibility for Monitoring | Monitor (Signature Required) (Date of Compliance) |
|---|---|---|---|---|---|
| | up alarms, which automatically adjust the alarm level based on the background noise level or switch off back-up alarms and replace with human spotters in compliance with all safety requirements and laws.<br>• If construction is anticipated for prolonged periods, as required by the Community Development Director or their assigned designee, erect temporary noise barriers (at least as high as the exhaust of equipment and breaking line-of-sight between noise sources and sensitive receptors), as necessary and feasible, to maintain construction noise levels at or below the performance standard of 80 dBA Leq. Barriers shall be constructed with a solid material that has a density of at least 4 pounds per square foot with no gaps from the ground to the top of the barrier. | | | | |
| N-2 | Noise and Vibration Analysis. Prior to issuance of a building permit for a project requiring pile driving during construction within 135 feet of fragile structures, such as historical resources, within 100 feet of nonengineered timber and masonry buildings (e.g., most residential buildings), or within 75 feet of engineered concrete and masonry (no plaster); or a vibratory roller within 25 feet of any structure, the project applicant shall prepare a noise and vibration analysis to assess and mitigate potential noise and vibration impacts related to these activities. This noise and vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer. The vibration levels shall not exceed Federal Transit Administration (FTA) architectural damage thresholds (e.g., 0.12 inches per second [in/sec] peak particle velocity [PPV] for fragile or historical resources, 0.2 in/sec PPV for nonengineered timber and masonry buildings, and 0.3 in/sec PPV for engineered concrete and masonry). If vibration levels would exceed these thresholds, alternative uses shall be used, such as drilling piles instead of pile driving and static rollers instead of vibratory rollers. If necessary, construction vibration monitoring shall be conducted to ensure vibration thresholds are not exceeded. | Future Project Applicants and Qualified Acoustical Consultant | Prior to Issuance of a Building Permit | City of Redondo Beach Community and Development Department and Building and Safety Department | |
| N-3 | Vibration Analysis. Prior to discretionary approval by the City of Redondo Beach for development projects subject to review under the California Environmental Quality Act (CEQA) (i.e., nonexempt projects), that utilize equipment that has the potential to result in vibration (e.g., pile drivers, jack hammers, and vibratory rollers), a vibration analysis shall be conducted to assess and mitigate potential vibration impacts. This vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer and shall follow the latest CEQA guidelines, practices, and precedents | Future Project Applicants and Qualified Acoustical Consultant | Prior to Discretionary Approval for Industrial Projects | City of Redondo Beach Community and Development Department and Building and Safety Department | |

# 4. Mitigation Monitoring Reports

Mitigation monitoring reports are required to document compliance with the Mitigation Monitoring Program and to resolve disputes. Specific reports include:

- Field Check Report
- Implementation Compliance Report
- Dispute/Enforcement Report

## 4.1 FIELD CHECK REPORT

Field check reports are required to record in-field compliance and conditions.

## 4.2 IMPLEMENTATION COMPLIANCE REPORT

The Implementation Compliance Report (ICR) is prepared to document the implementation of mitigation measures on a phased basis, based on the information in Table 3-1. The report summarizes implementation compliance, including mitigation measures, date completed, and monitor's signature.

## 4.3 DISPUTE/ENFORCEMENT REPORT

The Dispute/Enforcement Report (DER) is prepared to document the outcome of the Project Manager or City Manager and becomes a portion of the ICR.

# 4. Mitigation Monitoring Reports

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# 5. Community Involvement

Monitoring reports are public documents and are available for review by the general public. Discrepancies in monitoring reports can be taken to the Project Manager or Community Development Director by the general public.

# 5. Community Involvement

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# 6. Report Preparation

## LIST OF PREPARERS

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# 6. Report Preparation

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