

BLUE FOLDER ITEM

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

CITY COUNCIL MEETING APRIL 2, 2024

J.1 PUBLIC PARTICIPATION ON NON-AGENDA ITEMS

- PUBLIC COMMUNICATIONS**

From: [Stop BCHD](#)
To: [CityClerk](#); [cityclerk@hermosabeach.gov](#); [cityclerk@torranceca.gov](#); [cityclerk@manhattanbeach.gov](#); [Planredondo](#)
Subject: BCHD Project Fast Facts with Citations
Date: Monday, April 1, 2024 10:55:22 AM
Attachments: [BCHD Fast Facts with Cites.png](#)

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

Public Comment: Mayors, Councils, Planning Commissions of Redondo Beach, Hermosa Beach, Manhattan Beach, and Torrance

We continue to work with various parties to develop reference materials for easy use. If you have recommendations for additional reference materials, please email StopBCHD+Reference@gmail.com

BCHD DEVELOPMENT FAST FACTS

FACT	CITATION
<u>Total Size</u> Current campus: 312,000 sf Proposed redevelopment: 792,520 sf (2.5X)	BCHD CEQA EIR NOP Paul Murdoch Architects
<u>Development Height above Beryl & Flagler St</u> 108 feet, 8 inches	BCHD HLC Drawing Set Elevation 242'8" – 134'0" = 108' 8"
<u>Development Height above Diamond St</u> 102 feet, 0 inches	BCHD Refined HLC Master Plan, USGS Elevation 232' 0" – 130'0" = 102' 0"
<u>BCHD RCFE Project Ownership</u> BCHD has 0% ownership in the PMB LLC assisted living facility project	Cain Bros., Investment Bankers to BCHD
<u>allcove Service Area</u> Service area population: 1,409,500 (SPA8) District population: 122,000 (8.7% of SPA8) Non-Residents/Non-Taxpayers: 91.3%	BCHD SPA8 cities, 2020 Census data (rounded) 2020 Census data (rounded)
<u>Assisted Living Prospective Tenants</u> Non-Residents/Non-Taxpayers: 80% Resident-Taxpayers: 20%	BCHD MDS Consultants zip code level analysis Residents = 90254, 90266, 90277, 90278
<u>PACE Prospective Enrollees</u> Non-Residents/Non-Taxpayers: 95.5% Resident-Taxpayers: 4.5%	National PACE Association Statistics 2020 Census data
<u>Proposed allcove Building Site Land Rent</u> \$0/year on a \$4M taxpayer-owned parcel	BCHD public records response, Cain Bros. per acre land values

commercial development will inflict for the next 50-100 years. Our neighborhoods have been burdened since 1960 by the failed South Bay Hospital project and have not received the benefit of the voter-approved acute care public hospital since 1984. Yet we still suffer 100% of the damages and we will suffer 100% of the damages of BCHDs proposal.

From: [Stop BCHD](#)
To: [CityClerk](#); [Planredondo](#); [Planning Redondo](#); [Nils Nehrenheim](#); [Scott Behrendt](#); [Todd Loewenstein](#); [Paige Kaluderovic](#); [Zein Obagi](#)
Subject: Comments on Density of Public/Institution Land Use and Surrounding Property Value Protection (General Plan)
Date: Wednesday, March 20, 2024 1:19:06 AM
Attachments: [image.png](#)

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

Public Comment: General Plan, Mayor, Council, Planning Commission, Planning Director

- 1) The proposed floor area ratio (FAR) of 0.75 as a base for P/I zoning is appropriate. It protects surrounding neighborhoods from the damages of excessive development.
- 2) The proposed FAR of 1.25 for selected City of Redondo Beach parcels is appropriate. When the City of Redondo Beach develops land, it is nearly always for the exclusive benefit of residents and taxpayers of the City. As such, the benefits are greater than other P/I development that is generally for non-residents and regional use.
- 3) The March, August and September 2022 GPAC meeting materials contained the FAR 0.75 and FAR 1.25 for P/I in the draft General Plan materials. The public and GPAC members all had ready availability. It is unfortunate that some GPAC members failed to read the draft plan for all 3 consecutive meetings. Others not only read it, but also provided public comments in a timely fashion.
- 4) FAR 0.75 has demonstrated that it causes significant property value degradation to surround landowners. FAR 1.25 is inappropriate for P/I development that is not 100% (or very highly) focused on benefiting the residents and taxpayers of Redondo Beach.
- 5) As an example, the Redondo Beach residential properties within 1/2-mile of BCHD are worth nearly \$100M less than they would otherwise be if they were not located near the FAR 0.72 BCHD campus. This is a high level of damage, and one can only expect further value damages to property owners from a 1.25 FAR.

Redondo Beach Real Estate Devaluation From Proximity to BCHD

Total Property Owner Loss	\$	(97,364,520)
% Property Value Impact		-4.7%
Avg Impact per Property	\$	(64,437)
Max Impact per Property	\$	(315,667)

SAMPLE VALUE LOSSES PER RESIDENCE WITHIN 1/2 MILE OF BCHD

Carnelian St.

Largest Loss	\$	(106,452)
Average Loss	\$	(57,681)

Diamond St.

Largest Loss	\$	(300,326)
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N Lucia Ave.

Largest Loss	\$	(120,336)
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N Paulina Ave

Largest Loss	\$	(259,004)
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The City should move forward with the P/I FAR of 0.75 as a base and FAR 1.25 for specific City of Redondo Beach owned parcels as called out in the Draft General Plan. Publication and public notice was provided for 3 consecutive meetings of the GPAC in 2022, and in the 2023 CEQA NOP for the General Plan. Ample time for comment was provided and all legal notices were properly noticed.

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1960 by the failed South Bay Hospital project and have not received the benefit of the voter-approved acute care public hospital since 1984. Yet we still suffer 100% of the damages and we will suffer 100% of the damages of BCHDs proposal.

From: [Mark Nelson \(Home Gmail\)](#)
To: [CityClerk](#); [Planredondo](#); [Planning Redondo](#); [Nils Nehrenheim](#); [Scott Behrendt](#); [Todd Loewenstein](#); [Paige Kaluderovic](#); [Zein Obagi](#)
Subject: From Mark Nelson: Comments on Density of Redondo Beach Public/Institution Land Use and Surrounding Property Value Protection (RB General Plan)
Date: Wednesday, March 20, 2024 1:29:47 AM
Attachments: [image.png](#)

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I concur with the comments below and request that the General Plan affirm the Public-Institutional FARs of 0.75 for non-City of Redondo Beach development and 1.25 for City of Redondo Beach development. I see Kensington as a good example of a P-CF parcel that has been lost from the use of Redondo Beach residents for 50 to 100 years for the benefit of a majority of non-resident tenants. That is an excellent example of why FARs should be kept low except for the special case of City of Redondo Beach development.

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

From: **Stop BCHD** <stop.bchd@gmail.com>
Date: Wed, Mar 20, 2024 at 1:22 AM
Subject: Comments on Density of Redondo Beach Public/Institution Land Use and Surrounding Property Value Protection (RB General Plan)
To: Stop BCHD <stop.bchd@gmail.com>

The following comments were supplied to the General Plan, Council and others. We recommend that you forward this email to the same email list below and add a private comment.

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

From: **Stop BCHD** <stop.bchd@gmail.com>
Date: Wed, Mar 20, 2024 at 1:18 AM
Subject: Comments on Density of Public/Institution Land Use and Surrounding Property Value Protection (General Plan)
To: <cityclerk@redondo.org>, <planredondo@redondo.org>, <planningredondo@redondo.org>, Nils Nehrenheim <nils.nehrenheim@redondo.org>, <Scott.Behrendt@redondo.org>, <todd.loewenstein@redondo.org>, <paige.kaluderovic@redondo.org>, Zein Obagi <zein.obagi@redondo.org>

Public Comment: General Plan, Mayor, Council, Planning Commission, Planning Director

- 1) The proposed floor area ratio (FAR) of 0.75 as a base for P/I zoning is appropriate. It protects surrounding neighborhoods from the damages of excessive development.
- 2) The proposed FAR of 1.25 for selected City of Redondo Beach parcels is appropriate. When the City of Redondo Beach develops land, it is nearly always for the exclusive benefit of residents and taxpayers of the City. As such, the benefits are greater than other P/I development that is generally for non-residents and regional use.
- 3) The March, August and September 2022 GPAC meeting materials contained the FAR 0.75 and FAR 1.25 for P/I in the draft General Plan materials. The public and GPAC members all had ready availability. It is unfortunate that some GPAC members failed to read the draft plan for all 3 consecutive meetings. Others not only read it, but also provided public comments in a timely fashion.
- 4) FAR 0.75 has demonstrated that it causes significant property value degradation to surround landowners. FAR 1.25 is inappropriate for P/I development that is not 100% (or very highly) focused on benefiting the residents and taxpayers of Redondo Beach.
- 5) As an example, the Redondo Beach residential properties within 1/2-mile of BCHD are worth nearly \$100M less than they would otherwise be if they were not located near the FAR 0.72 BCHD campus. This is a high level of damage, and one can only expect further value damages to property owners from a 1.25 FAR.

Redondo Beach Real Estate Devaluation From Proximity to BCHD

Total Property Owner Loss	\$	(97,364,520)
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The City should move forward with the P/I FAR of 0.75 as a base and FAR 1.25 for specific City of Redondo Beach owned parcels as called out in the Draft General Plan. Publication and public notice was provided for 3 consecutive meetings of the GPAC in 2022, and in the 2023 CEQA NOP for the General Plan. Ample time for comment was provided and all legal notices were properly noticed.

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1960 by the failed South Bay Hospital project and have not received the benefit of the voter-approved acute care public hospital since 1984. Yet we still suffer 100% of the damages and we will suffer 100% of the damages of BCHDs proposal.

From: [REDACTED]
To: [CityClerk](#); [Planredondo](#); [Planning Redondo](#); [Nils Nehrenheim](#); [Scott Behrendt](#); [Todd Loewenstein](#); [Paige Kaluderovic](#); [Zein Obaid](#)
Subject: Fw: Comments on Density of Redondo Beach Public/Institution Land Use and Surrounding Property Value Protection (RB General Plan)
Date: Wednesday, March 20, 2024 4:24:30 PM
Attachments: [image.png](#)

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Public Comment: General Plan, Mayor, Council, Planning Commission, Planning Director

1) The proposed floor area ratio (FAR) of 0.75 as a base for P/I zoning is appropriate. It protects surrounding neighborhoods from the damages of excessive development. The Redondo Beach General Plan is for the benefit of the residents and taxpayers of the City. The General Plan should protect City residents from excessive development, density, noise, pollution, traffic, and other quality-of-life damages.

2) The proposed FAR of 1.25 for selected City of Redondo Beach parcels is appropriate. When the City of Redondo Beach develops land, it is nearly always for the exclusive benefit of residents and taxpayers of the City. As such, the benefits are greater than other P/I development that is generally for non-residents and regional use. The proposed BCHD campus will service from 91% to 97% non-residents of Redondo Beach as it ties up Redondo Beach public zoned land for 95 years. BCHD's own consultant report shows that only 9% of the assisted living tenants are expected to come from 90277 and 90278. Redondo Beach is only 5% of the alcove service area of 1.4M population from Avalon to Long Beach to El Segundo. And the National PACE Association found that only 1 in 1,000 seniors use PACE, meaning that Redondo Beach will have 10 or fewer PACE enrollees in BCHD's massive 400 enrollee facility. For only 3% to 9% of the facilities' use, Redondo Beach residents suffer 100% of the damages and lost public land.

3) The March, August and September 2022 GPAC meeting materials contained the FAR 0.75 and FAR 1.25 for P/I in the draft General Plan materials. The public and GPAC members all had ready availability. It is unfortunate that some GPAC members failed to read the draft plan for all 3 consecutive meetings. Others not only read it, but also provided public comments in a timely fashion.

4) FAR 0.75 has demonstrated that it causes significant property value degradation to surrounding landowners. FAR 1.25 is inappropriate for P/I development that is not 100% (or very highly) focused on benefiting the residents and taxpayers of Redondo Beach. Redondo Beach must assure that its Public/Institutional facilities developed on public land serve at least a majority of Redondo Beach residents at the facilities. Otherwise, the damages surely outweigh any benefits to residents.

5) As an example, the Redondo Beach residential properties within 1/2-mile of BCHD are worth nearly \$100M less than they would otherwise be if they were not located near the FAR 0.72 BCHD campus. This is a high level of damage, and one can only expect further value damages to property owners from a 1.25 FAR.

Please hold the line on excessive development and protect our public lands. An FAR of 0.75 for non-City of Redondo Beach facilities is entirely appropriate to protect residents. An FAR of 1.25 for resident facilities is a valid trade-off of benefits to damages that provides more City services.

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since 1960 by the failed South Bay Hospital project and have not received the benefit of the voter-approved acute care public hospital since 1984. Yet we still suffer 100% of the damages and we will suffer 100% of the damages of BCHDs proposal.

From: [linda neal](#)
To: [CityClerk](#); [Planredondo](#); [Planning Redondo](#); [Nils Nehrenheim](#); [Scott Behrendt](#); [Todd Loewenstein](#); [Paige Kaluderovic](#); [Zein Obagi](#)
Subject: Fwd: Comments on Density of Redondo Beach Public/Institution Land Use and Surrounding Property Value Protection (RB General Plan)
Date: Wednesday, March 20, 2024 5:40:54 PM
Attachments: [image.png](#)

Some people who received this message don't often get email from [REDACTED] [Learn why this is important](#)

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Hello All,

I have been following the BCHD plan since the early days. I think it is inappropriate and reminiscent of the debacle with Center-Cal. I do agree that the complex needs serious updating, maybe underground parking, green space and facilities to serve the public.

All that does not include an expensive senior facility built in conjunction with a private company. I see only trouble for the citizens and BCHD if we take this route. I would think there are other ways to fund this development, and I would not be against some kind of local tax. Get the people involved. Get them to care about this and make it benefit everyone.

Sincerely,
Linda Neal

Let's raise a toast to the Buddha
of laughing gas and sunflowers . . .

-from "Smile Sutra"

Begin forwarded message:

From: Stop BCHD <stop.bchd@gmail.com>
Subject: Comments on Density of Redondo Beach Public/Institution Land Use and Surrounding Property Value Protection (RB General Plan)
Date: March 20, 2024 at 1:22:28 AM PDT
To: Stop BCHD <stop.bchd@gmail.com>

The following comments were supplied to the General Plan, Council and others. We recommend that you forward this email to the same email list below and add a private comment.

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To: <cityclerk@redondo.org>, <planredondo@redondo.org>, <planningredondo@redondo.org>, Nils Nehrenheim <nils.nehrenheim@redondo.org>, <Scott.Behrendt@redondo.org>, <todd.loewenstein@redondo.org>, <paige.kaluderovic@redondo.org>, Zein Obagi <zein.obagi@redondo.org>

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the voter-approved acute care public hospital since 1984. Yet we still suffer 100% of the damages and we will suffer 100% of the damages of BCHDs proposal.

From: [Stop BCHD](#)
To: [CityClerk](#); [Planredondo](#); [Planning Redondo](#)
Subject: Fwd: Fw: BCHD Planned expansion is bad for South Bay Residence
Date: Sunday, March 31, 2024 5:17:14 PM

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

Comments to Mayor, Council and General Plan Staff from Mr. Morse, forwarded at his request

Subject: Re: BCHD Planned expansion is bad for South Bay Residents

50 yr beach cities taxpayer - mb & rb resident/business owner

On Mar 20, 2024, at 1:14 PM, Steve Morse [REDACTED] wrote:

1. Using our funds for 90-95% families, out of our area, seems inappropriate.
2. Overcrowding and increasing FAR also seem like abusing the system
3. Open space planned for free parking space to a company is not appropriate - it should be rented out to highest bidder, or even social services for volunteers, as an idea or other nonprofits, for the benefits of the South bay.
4. Isn't time to redirect the BCHD towards direct benefits for local paying communities and refocus on getting more local participation or reduce services and expenses to reflect actual activities benefitting us.
5. This reminds me of the beach expansion idea that research showed was an extravagant idea that could have put an unbearable burden on our community.

Thanks, Steve Morse, 40-year resident of the South Bay

KEEP P/I FAR AT 0.75 BASE AND 1.25 FOR LIMITED CITY OWNED PARCELS

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

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

development.

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

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

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

**PUBLIC NOTICE OF THE 0.75 / 1.25 PROPOSAL WAS REPEATED
MADE TO GPAC**

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

**IF THE 0.75 / 1.25 PROPOSAL IS NOT SUSTAINABLE, ROLL BACK
P/I to 0.75 FAR**

For the protection of the surrounding public, the City should roll back the FAR for P/I to 0.75 uniformly if it concludes that FAR 1.25 for specific Redondo Beach resident-taxpayer owned is indefensible on the grounds of benefits to residents of Redondo Beach.

**BCHD PLANS TO PRIVATIZE P/I LAND USE THROUGH 95 YEAR
CONTRACTS**

It's not at all clear that BCHD intends to use the P-CF zoning for PUBLIC use. It appears that BCHD plans to lease 3 acres to a 100% private entity for 95 years for commercial use. BCHD's estimates show that 80% of the use will be by non-residents. <https://www.stopbchd.com/post/only-bchd-preserve-public-space-by-leasing-it-to-a-100-private-developer-for-95-years>

CURRENT P-CF INDUCED PROPERTY VALUE DAMAGES EXCEED \$150M

Consolidated property damage values from existing 0.72 FAR P-CF site on RB/Torrance border:

\$97M Redondo Beach property value declines within 1/2-mile
\$65M Torrance property value declines within 1/2-mile

LOCAL REDONDO BEACH RESIDENTS SUFFER NEARLY \$100M IN PROPERTY VALUE DECLINE WITHIN 1/2-MILE OF THE BCHD PARCEL AND HIGHER FAR DEVELOPMENT WILL CREATE MORE DAMAGES

The property value decline (\$97M) in Redondo Beach surrounding the 312,000 sf, 99.7% under 52-foot tall campus is estimated by econometric models and the dataset used by BCHD's MDS consultants for market analysis (purchased and licensed by StopBCHD). <https://www.stopbchd.com/post/redondo-beach-property-value-loss-within-1-2-mile-of-bchd-campus-over-97m-2024-update>

The impact of being within 1/2-mile of BCHD campus has been estimated for Torrance residences, using the Redondo Beach model as a proxy. The property value damage from proximity to the 312,000 sf, 99.7% under 52-foot tall existing campus is \$65M. Greater FARs and denser development will undoubtedly create larger losses for surrounding property values and property owners.

PCDR REQUIRES PROTECTION OF PROPERTY VALUES

The PCDR requires that new developments are subject to protecting property values. The 0.72 FAR of BCHD site damages surrounding property by \$100M. The current 0.75 proposed FAR will result in increased property value damage.

P/I LAND USE SHOULD BE USED FOR THE BENEFIT OF REDONDO BEACH RESIDENTS

From a policy perspective, P/I land should be used primarily for the benefit of Redondo Beach residents. Based on BCHD's consultant's work, Kensington (P-CF zoned) likely services 80% non-residents on 3 acres of P/I land. The use of Redondo Beach public land is unsustainable if it is consumed for non-resident use.

BCHD PROPOSED HLC IS 80% to 95% DISTRICT NON-RESIDENTS

BCHD PROPOSED HLC IS 91% to 97% REDONDO NON-RESIDENTS

BCHD's HLC is supermajority benefit of non-residents

RCFE - BCHD's MDS consultant demonstrates 91% non-Redondo Beach resident tenants by zip code for the assisted living

PACE - BCHD's PACE will be 97% non-Redondo Beach resident enrollees.

allcove - BCHD's allcove services LA County SPA8 (1.4M population) and is 95% non-Redondo Beach residents.

While the damages of P/I fall entirely to Redondo Beach, the benefits of BCHD proposed HLC accrue to 91% to 97% non-Redondo Beach residents.

Residents should NOT have damages to service NON-RESIDENTS on P/I land

CITY RESIDENT-TAXPAYER OWNED SITES SHOULD NOT REQUIRE PCDR REVIEW

Sites developed by the City of Redondo Beach for the majority benefit of residents should not require a PCDR process. They should be assumed compliant.

It should be explicitly stated that P/I land use should be for at least a majority benefit of the residents of Redondo Beach. The damages accrue 100% to Redondo Beach residents, therefore, they should receive a minimum level of a majority of benefits from the land use.

THE CURRENT P-CF BCHD SITE IS NON-CONFORMING WITH ITS CUP

At least one P/I site, the BCHD campus, no longer has a hospital, therefore, "associated medical" are no longer permitted uses. They can be allowed to remain until their natural sunset lifespans.

OBJECTIVE NUMERICAL FARs ARE REQUIRED

The State mandate for objective (not subjective) standards requires the city abandon the PCDR chosen FAR and it be replaced by objective standards. This proposal is consistent with State mandate.

BCHD HAD A PAID CONSULTANT AS CHAIR OF THE GPAC

Nick Biro was the Chair of GPAC and a \$10,000 to \$15,000 per month retained consultant of BCHD. Mr. Biro had both a GPAC obligation and a fiduciary taxpayer obligation via his BCHD to review all draft General Plan documents and provide comments timely.

THREE GPAC MEETINGS PUBLICIZED THE FAR PROPOSAL

March, August and September 2022 GPAC meetings and 2024 CEQA NOP for GP all included public notice of the P/I proposed 0.75 and 1.25 FAR.

The full content of each of the following html links is also entered into the formal record, in the same way as attached files would be under California law:

<https://www.stopbchd.com/post/the-redondo-beach-general-plan-far-for-p-i-land-use-is-appropriate-and-should-not-be-changed>

<https://www.stopbchd.com/post/where-is-the-city-s-or-bchd-s-analysis-of-the-property-value-damages-from-the-current-bchd-developme>

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<https://www.stopbchd.com/post/torrance-property-value-loss-within-1-2-mile-of-bchd-campus-is-65m>

<https://www.stopbchd.com/post/stop-bchd-s-high-density-commercial-development-on-public-zoned-land>

From: [Mark Nelson \(Home Gmail\)](#)
To: [Communications](#); [Robert W. Lundy](#); rmiller@hooperlundy.com; [Michael Webb](#); [CityClerk](#)
Subject: Fwd: Preserve our Public Spaces, Social Workers Month, the 2024 Winter Edition of the LiveWell magazine, tips to improve your sleep health and more!
Date: Wednesday, March 27, 2024 7:31:25 AM

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

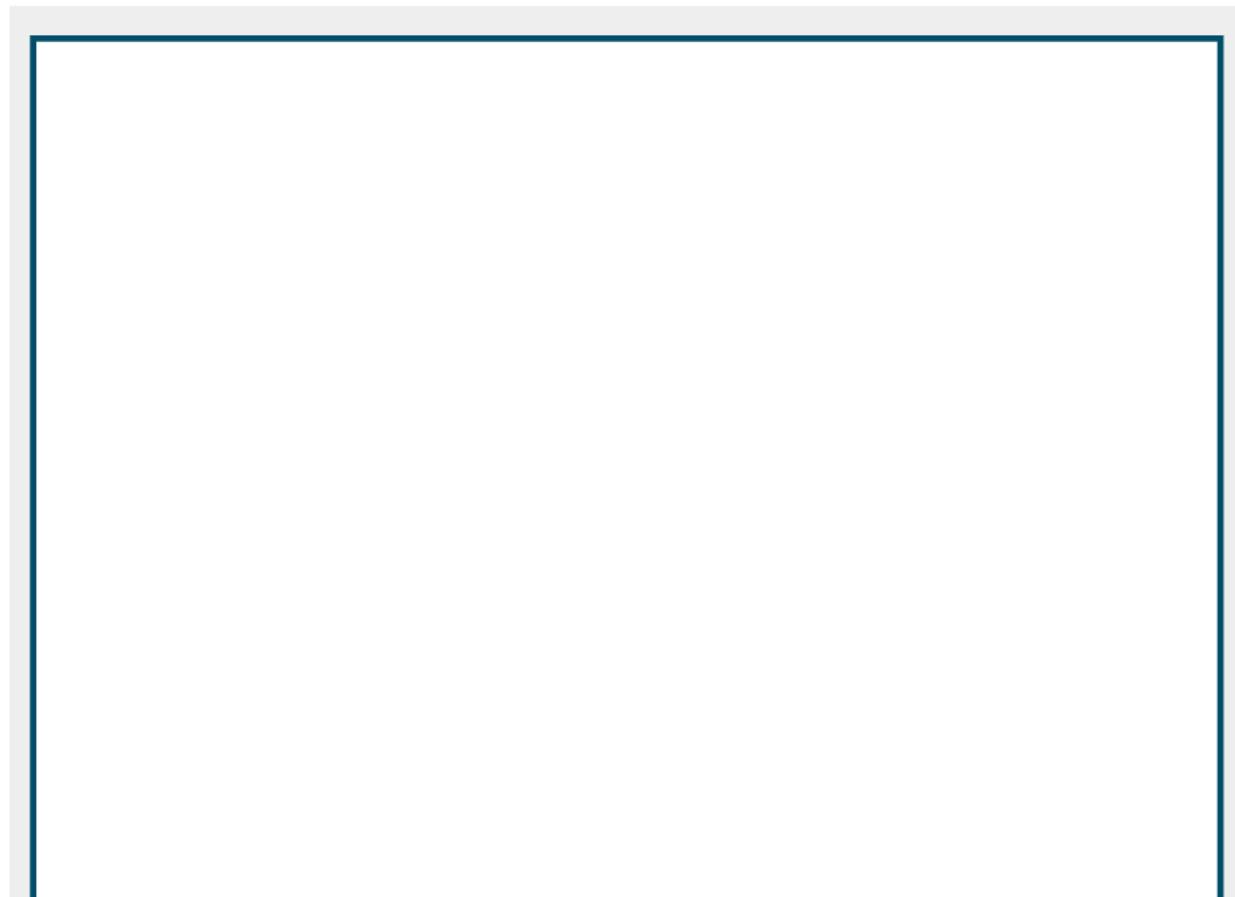
Public Comment

This is the most misleading email that BCHD has ever sent. BCHD plans to lease 3 acres of 100% PUBLIC owned land to PMB LLC, a 100% PRIVATE developer and BCHD misleads with "Preserve Public Spaces." BCHD is deliberately attempting to transfer the use of 3 acres of public space to PMB LLC for up to 95 years.

This is yet another BCHD communication that deserves a State advertising fraud complaint.

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

From: **Beach Cities Health District** <communications@bchd.org>
Date: Tue, Mar 26, 2024 at 6:01 PM
Subject: Preserve our Public Spaces, Social Workers Month, the 2024 Winter Edition of the LiveWell magazine, tips to improve your sleep health and more!
To: [REDACTED]



March 26, 2024

**Use Your Voice to
Safeguard & Preserve
Our Public Spaces**
*Comments on the proposed
Redondo Beach General Plan
Update are due by March 31!*

In its General Plan update, the City of Redondo Beach is considering a reduction in how much can be built on public property – a change that would not allow full development of Phase 1 of the Healthy Living

Campus or any development of Phase II (Community Wellness Pavilion, Aquatic Center, Center for Health & Fitness). If approved, this would significantly limit our ability to modernize our campus and compromise BCHD's ability to provide preventive health services to the community.

In planning jargon, the draft Focused General Plan Update includes a maximum Floor Area Ratio (FAR) – calculated by dividing the gross floor area of a building by the total lot size – at BCHD's campus at 514 N. Prospect Avenue in Redondo Beach. The change would set a 0.75 FAR on BCHD's campus while allowing a 1.25 FAR for city properties. This would be a devastating blow to BCHD's plans for the future.

As this action would **directly impact BCHD's ability to meet the health needs of residents in Hermosa Beach, Manhattan Beach and Redondo Beach**, we invite you to actively engage and participate in the public process for the City of Redondo Beach's draft Focused General Plan Update.

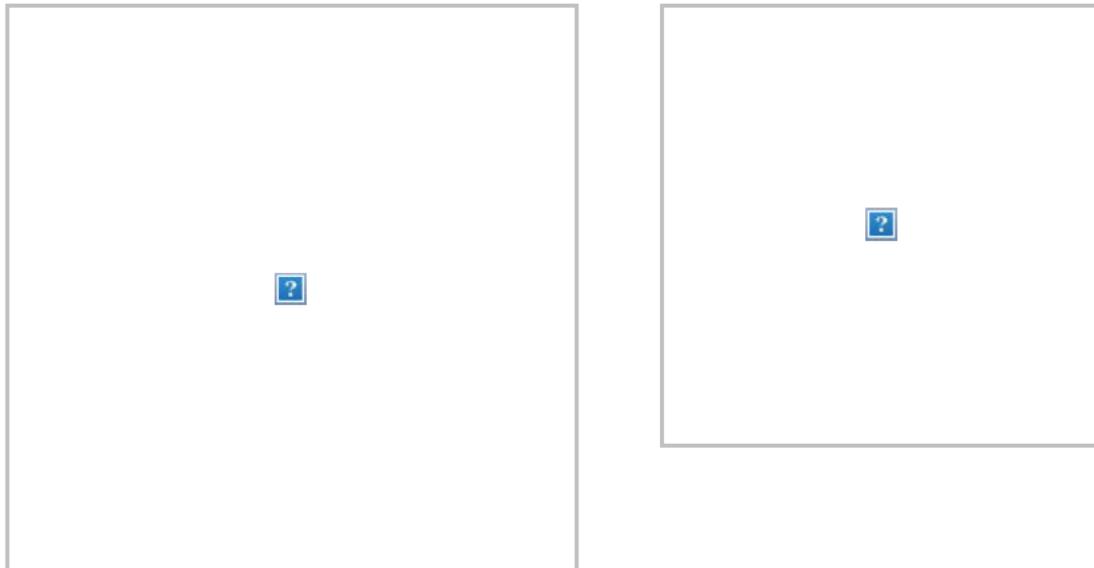
GET INVOLVED

Your voice matters, and we encourage you to get involved:

- Comment on the draft General Plan: <https://redondo.konveio.com/focused-general-plan-update#page=35> (*The FAR change affecting BCHD can be found in the Land Use Element section, page 2-11 (p. 35 of the full document) under "Public/ Institutional/Open Space."*) Click anywhere in the document to add a comment. ***The City is accepting comments through March 31, 2024.***

Building a Healthier Future

To learn more about the Healthy Living Campus, please visit our website at www.bchdcampus.org.



March is Social Worker Month

Beach Cities Health District (BCHD) has a wonderful team of dedicated and knowledgeable social workers who support older adults and young people in our community. Social workers at BCHD help older adults age in place and support their quality of life while our social workers at allcove Beach Cities support the mental health and overall well-being of young people ages 12-25 across the South Bay.

BCHD social workers through our Care Management Program provide confidential in-home visits and assessments along with recommended care plans and frequent follow-up to support independent living at home. The program is designed to address the challenges related to caregiving, isolation, difficulty with daily tasks, transportation, mobility, healthcare access and more. Our social workers also provide social support to clients with dementia as well as their caregivers and are out in the community facilitating workshops for older adults.

Social workers at allcove Beach Cities provide care to young people ages 12-25 ensuring they get the support, treatment and tools needed to take care of their mental health. This includes counseling, bereavement support, eating disorder prevention and support groups.

During Social Worker Month in March, we're recognizing this special team for all their contributions! Thank you for all that you do!

[**Learn more about BCHD's
Care Management for older
adults**](#)

[**Learn more about allcove
Beach Cities**](#)



**BCHD's Healthy Living Campus:
Building the Future Home of Youth Mental Health
*Groundbreaking expected Fall 2024***

The Healthy Living Campus project continues to move forward, transforming the 63-year-old Beach Cities Health District campus in Redondo Beach. In December 2023, BCHD and the City of Redondo Beach put the finishing touches on the Diamond Street Bike Path project, a precursor to the Healthy Living Campus, which will get underway later this year with the groundbreaking for the permanent home of allcove Beach Cities.

The new campus will provide one of the area's only youth wellness centers specifically focused on the mental health of young people, allcove Beach Cities. The allcove facility will be built at the SW corner of Beryl Street and Flagler Lane, on land owned by BCHD. The next steps for allcove Beach Cities include the selection of a Progressive Design Build team, with groundbreaking for fall 2024.

Phase I of the campus also includes acres of green space; a unique all-inclusive out-patient facility for older adults that includes medical care, and residential care facilities for the elderly. Phase II includes a Community Wellness Pavilion, aquatics and the Center for Health & Fitness.



[Click here to read about the latest Healthy Living Campus updates in our LiveWell Magazine](#)

Four Ways to Prioritize Your Sleep Health

Getting enough sleep is important for people of all ages to stay in good health. Sleep plays a crucial role in our daily lives and can impact many aspects of our health and well-being.

According to the Centers for Disease Control and Prevention (CDC), insufficient sleep in children and adolescents can lead to various health issues, such as obesity, type 2 diabetes, poor mental health and injuries. Moreover, they may suffer from attention and behavior problems, which can negatively impact their academic performance.

[Read More](#)



Questions about Medicare?

Receive free, unbiased Medicare help from the Center for Health Care Rights by scheduling an in-person appointment with a State-registered Health Insurance Counseling and Advocacy Program (HICAP) counselor. The counselor can assist with questions and problems related to:

- Medicare coverage rules
- Medicare Part A and B eligibility, benefits and claims
- Medicare coordination with private insurance
- Medicare Part D plan choices
- Insurance options for supplementing Medicare — Medigap insurance, Medicare Advantage, Medi-Cal
- Programs that help low-income beneficiaries with Medical expenses — Medi-Cal, Medicare Savings Programs, Extra Help to assist those who qualify pay for prescription drugs

To schedule an appointment, please call Beach Cities Health District's Assistance, Information and Referral line at (310) 374-3426, Option 1. Appointments are currently available most Thursdays at the Center for Health and Fitness; please call us to book your appointment.

[Learn More](#)

BCHD Board of Directors Invites Residents and High School Students to Apply for Advisory Committees

The Beach Cities Health District (BCHD) Board of Directors is seeking qualified residents and Youth Representatives to serve on its advisory committees. All committee members have a direct impact on the health and wellness programs and services BCHD provides to the Beach Cities community. Meetings are generally held quarterly and scheduled for evenings. Committee members must reside in Hermosa Beach, Manhattan Beach or Redondo Beach.



The following committees are seeking candidates:

Community Health Committee

Responsible for assessing community health and wellness concerns, monitoring the availability of community health resources, and recommending programs, service areas and business ventures to promote high-quality standards of health in the Beach Cities.

Strategic Planning Committee

Assists the Board in formulating and fulfilling BCHD's strategic vision, mission and goals on an annual basis. Additionally, the committee is responsible for overseeing the development of BCHD's strategic plan, which is updated every three years.

Finance Committee

Responsible for budget oversight, audit review, setting investment policies and business plan development. Members are expected to have demonstrated experience in finance, business or banking.

Properties Committee Community Advisors

Assists the Board in fulfilling its responsibility for managing District properties. The Committee Advisors are responsible for policy advice to the Board on property assets; acquisition, development, leasing and disposition of District properties; lease negotiation oversight; and, capital development plans.

Residents who wish to be considered must complete an application.
[PLEASE CLICK HERE.](#)

Youth Representatives who wish to be considered must complete an application.
[PLEASE CLICK HERE.](#)

All applications are due by noon on Monday, May 6, 2024. Top candidates will be contacted for interviews and appointments will be announced in June. All terms begin July 1, 2024. Terms are two years for adult members and one year for high school students.

Community members with questions about the positions or application process should contact Charlie Velasquez at charlie.velasquez@bchd.org or call (310) 374-3426, Ext. 8213.

Join the Moai Movement

A Moai® (pronounced “Mo Eye”) is a group of people meeting for a common purpose and can include activities like walking, purpose discussions and potluck meals. The word “Moai” comes from Okinawa, Japan, where neighbors use Moais as support systems. Based on this tradition, Moai groups are considered just as important to a person’s health as the benefits of being active, healthy eating and finding a purpose.

NEW: Veg-Out Potluck Group

This is your opportunity to showcase your cooking skills, exchange your savviest tips for making vegetarian dishes delicious, and make new friends. Bring a homemade vegetarian dish so we can veg-out

together!

Tuesday, April 9
5 - 7 p.m.
514 N. Prospect Ave.,
Beach Cities Café, 1st Floor
Redondo Beach, CA 90277

[Register Here](#)

For a list of all of our active moais, [click here](#) or visit bchd.org/moai. If you have additional questions or comments, please contact Jackie Uy (Jackie.Uy@bchd.org).



[Click here to register for the events below](#)

Moai Social Event: Keep the Esplanade Beautiful Beach Clean-Up

In collaboration with Keep the Esplanade Beautiful, we invite you to join us in helping preserve our beautiful South Bay Coast while connecting with your friendly neighborhood community.

Saturday, April 6
9 - 11 a.m.
Sacks on the Beach in Riviera Village
1611 S. Catalina Ave. #120
Redondo Beach, CA 90277

Moai Social Event: Plant and Potluck

Wilderness Park Workdays prepare Wilderness Park for the planting season this fall! Join South Bay Parkland Conservancy and BCHD in maintaining, watering and weeding at the park. Gloves and tools are provided, but volunteers are welcome to bring their own.

Tuesday, April 30
10 a.m. - 12 p.m.
Hopkins Wilderness Park
1102 Camino Real
Redondo Beach, CA 90277

We recommend you bring:

- Closed-toe shoes (boots preferred)
- Clothes that you do not mind getting dirty or wet
- Water and snacks
- Sunscreen

Afterward, we will host a vegetarian potluck where you can chat and share your favorite healthy recipes with other volunteers. We recommend bringing a dish that does not need to be refrigerated and comes in a reusable container to reduce waste. Reusable serving utensils will be provided for attendees in addition to compostable utensils and plates. Space is limited.



Join us for a Free Screening of "Screenagers: Under the Influence"

Beach Cities Health District (BCHD) and South Bay Families Connected are partnering with Redondo Beach Unified School District to host a community showing of the documentary, "Screenagers: Under the Influence," a film that delves into how the tech revolution has reshaped adolescence and its effects on substance use. [Watch the trailer here.](#)



Students and families are invited to attend an informative and entertaining film experience that focuses on practical solutions for keeping teens safe in a

changing world. The film debunks myths and depicts strategies parents and schools can use to encourage healthy decision-making, support teen mental health, set limits and create healthy home environments. The film also includes many ways young people are using their wisdom and strength to help each other and themselves through this complicated terrain around substance use.

Attendees will have the opportunity to take home a free Narcan (common brand name of naloxone) kit. Naloxone is a life-saving opioid reversal medication when administered immediately after a potential opioid overdose. BCHD's supply of naloxone is provided by the California Department of Health Care Services' Naloxone Distribution Project.

Wednesday, March 27
Parras Middle School, Multipurpose Room
200 N. Lucia Ave., Redondo Beach
6 – 7:30 p.m., doors open at 5:30 p.m.

South Bay students and families are welcome to attend.

[Register Here](#)

Hybrid Board of Directors Meetings

BCHD holds public board meetings on the fourth Wednesday of the month. Residents are encouraged to attend board meetings either via Zoom or in BCHD's Beach Cities Room - Lower Level, 514 N. Prospect Ave. in Redondo Beach. You may also contact board members directly with questions or comments, or call 310-374-3426, ext. 8213.



Regular Board Meeting
Wednesday, March 27
6:30 p.m.

[Visit Our Website](#)

Social Hour with BCHD Care Manager Charlotte Barnett

If you have a question regarding community resources, want to learn more about Beach

Cities Health District or share and learn ways to keep busy, please join us! These meetings are for all, a place to connect and feel heard.

**First & Third Tuesday of the Month, Virtual
(April 2 & 9)
10 – 11 a.m.**

Zoom link: <https://bchd-org.zoom.us/j/87651635014>

**2nd Mondays, In person
(April 8)
2 – 3 p.m.**

**Manhattan Beach Joslyn Center, Sunset Room
1601 N. Valley Dr., Manhattan Beach, CA 90266**

Learn More

Virtual Mindfulness Drop-In

Take 30 minutes to downshift and practice mindfulness techniques. The guided session will be led by a trained Beach Cities Health District instructor.

**First Wednesday of the Month
(April 3)
4 – 4:30 p.m.**



Register Now

QPR Suicide Prevention Training

[QPR Suicide Prevention Training](#) helps individuals recognize warning signs of a suicide crisis and how to Question, Persuade and Refer

someone to help. The training is aimed at equipping people with the knowledge and skills necessary to intervene and support someone who may be struggling with suicidal thoughts or behaviors.

Learn skills to engage someone in crisis to discuss their distress, provide hope and refer them to someone who can formally assess and intervene. Attendees will have the opportunity to take home a free Narcan (common brand name of naloxone) kit.

Monday, April 8, 2024
4 - 6 p.m.
514 N. Prospect Ave.,
Redondo Beach
Lower Level – Beach Cities Room

Register Now

Virtual Families Connected Parent Chat

Provided in partnership with South Bay Families Connected, Beach Cities Health District and Thelma McMillen Center, the Parent Chat offers its participants a confidential and supportive space to share their parenting challenges and successes.

Second Tuesday of the Month
(April 9)
10 – 11 a.m.
Zoom: <https://us06web.zoom.us/j/87374623578>

Learn More

Virtual Happiness Chats

This is a casual discussion group with light-

hearted activities to spark conversation. Share ideas, tips, resources, jokes, quotes – anything that supports our happiness!

Second Tuesday of the Month
(April 9)
12:30 – 1 p.m.



[Register Here](#)

teen Mental Health First Aid Training

Beach Cities Health District is providing an opportunity for young people, ages 15 -18, to be trained in teen Mental Health First Aid (tMHFA). Training is currently free to attend.

tMHFA is a training program that teaches teens ages 15 -18 how to identify, understand and respond to signs of mental health and substance use challenges in their friends and peers.



Participants must:

- Attend all three sessions to be certified.
- Must be in 10th, 11th or 12th grade or between ages 15 -18 to participate.

Wednesdays, April 10, 17 and 24

5 - 6:30 p.m.

1200 Del Amo St., Redondo Beach, CA 90277

[Register Here](#)



What I Wish My Parents Knew: Dangers of Youth Substance Use and Fentanyl

Beach Cities Health District (BCHD) and the Beach Cities Partnership for Youth Coalition is partnering with South Bay Families Connected to host in-person events that will include a film screening of “Dead on Arrival,” a fentanyl documentary by Dominic Tierno and Christine Wood, followed by a panel discussion. This event is intended for parents and caregivers to hear from local young people who have lived experience with substance use. Panelists:

- Sebastian Martin, Executive Director of Operations at New Life House
- Brooke Juhasz, Program Director at Clarity Sober Living

Thursday, April 11
6 – 7:30 p.m.

Manhattan Beach Middle School
Multipurpose Room
1501 N. Redondo Ave.,
Manhattan Beach

Tuesday, April 16
6 – 7:30 p.m.

Adams Middle School
Multipurpose Room
2600 Ripley Ave.,
Redondo Beach

Naloxone (the life-saving opioid overdose reversal medication) will be available for participants. BCHD’s supply of naloxone is provided by the California Health Care Services’ Naloxone Distribution Project.

[Register Here](#)

Hermosa Beach Senior Coffee Hour

Join us at the Hermosa Five-0 Senior Activity Center for a cup of coffee and to learn more about the services Beach Cities Health District provides to older adult residents. This event is open to the public. Stop by anytime and join the discussion!



Thursday, April 18

9 - 10 a.m.

Hermosa Five-0

710 Pier Ave., Hermosa Beach

LIVEWELL. WE CAN HELP.

Find health-related resources and information for adults and families within the South Bay and Greater Los Angeles area.

[Find Local Health Resources Near You](#)

For additional assistance, contact Beach Cities Health District's Assistance, Information and Referral Line, (310) 374-3426 and press option 1.

AdventurePlex

Where kids and families play their way to good health



- Summer camp
- [NEW! Flex Kids Club Membership](#)
- Drop-in play
- Birthday parties
- Supervised weekend play so parents can have a night out
- Special events
- ToddlerTown play area
- 5-level play structure

- Programs for ages 0-12

AdventurePlex
1701 Marine Ave.
Manhattan Beach, CA 90266
(310) 546-7708

[Learn More](#)

allcove Beach Cities

allcove is a place for young people (ages 12-25) to take a moment of pause and access a range of services that include:

- Mental health
- Physical health
- Substance use
- Peer support
- Family support
- Supported education and employment



[Learn More](#)

Center for Health & Fitness

Our comprehensive fitness center in Redondo Beach is one of two fitness facilities in California certified by the Medical Fitness Association!

- Cycling, Zumba, yoga, Pilates, strength & other exercise classes
- Online exercise classes
- Classes for older adults
- Programs for chronic conditions
- Access to trainers
- Massage
- Nutrition consultation
- Access to state-of-the-art gym equipment



[Learn More](#)



[Join Our Mailing List](#)

Beach Cities Health District | 514 N. Prospect Ave., 1st Floor, Redondo Beach, CA 90277

[Unsubscribe](#) menel.son@gmail.com

[Update Profile](#) | [Constant Contact Data Notice](#)

Sent by communications@bchd.org powered by



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From: [Stop BCHD](#)
To: [CityClerk](#); [Planredondo](#); [Planning Redondo](#)
Cc: [REDACTED]
Subject: Fwd: Public Comments - P/I FAR in Draft General Plan
Date: Saturday, March 30, 2024 11:23:24 AM

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

Filed at the request of RA Loeffler.

Dear Mayor, Council, Planning Commission, and General Plan Staff:

These comments are being filed at the request of the cc:d party on this email. Please add them to the record of the draft General Plan and the P/I FAR issue. Thank you.

KEEP P/I FAR AT 0.75 BASE AND 1.25 FOR LIMITED CITY OWNED PARCELS

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

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

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

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

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

PUBLIC NOTICE OF THE 0.75 / 1.25 PROPOSAL WAS REPEATED MADE TO GPAC

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

IF THE 0.75 / 1.25 PROPOSAL IS NOT SUSTAINABLE, ROLL BACK P/I to 0.75 FAR

For the protection of the surrounding public, the City should roll back the FAR for P/I to 0.75 uniformly if it concludes that FAR 1.25 for specific Redondo Beach resident-taxpayer owned is indefensible on the grounds of benefits to residents of Redondo Beach.

BCHD PLANS TO PRIVATIZE P/I LAND USE THROUGH 95 YEAR CONTRACTS

It's not at all clear that BCHD intends to use the P-CF zoning for PUBLIC use. It appears that BCHD plans to lease 3 acres to a 100% private entity for 95 years for commercial use. BCHD's estimates show that 80% of the use will be by non-residents. <https://www.stopbchd.com/post/only-bchd-preserve-public-space-by-leasing-it-to-a-100-private-developer-for-95-years>

CURRENT P-CF INDUCED PROPERTY VALUE DAMAGES EXCEED \$150M

Consolidated property damage values from existing 0.72 FAR P-CF site on RB/Torrance border:

\$97M Redondo Beach property value declines within 1/2-mile
\$65M Torrance property value declines within 1/2-mile

LOCAL REDONDO BEACH RESIDENTS SUFFER NEARLY \$100M IN PROPERTY VALUE DECLINE WITHIN ½-MILE OF THE BCHD PARCEL AND HIGHER FAR DEVELOPMENT WILL CREATE MORE DAMAGES

The property value decline (\$97M) in Redondo Beach surrounding the 312,000 sf, 99.7% under 52-foot tall campus is estimated by econometric models and the dataset used by BCHD's MDS consultants for market analysis (purchased and licensed by StopBCHD). <https://www.stopbchd.com/post/redondo-beach-property-value-loss-within-1-2-mile-of-bchd-campus-over-97m-2024-update>

The impact of being within 1/2-mile of BCHD campus has been estimated for Torrance residences, using the Redondo Beach model as a proxy. The property value damage from proximity to the 312,000 sf, 99.7% under 52-foot tall existing campus is \$65M. Greater FARs and denser development will undoubtedly create larger losses for surrounding property values and property owners.

PCDR REQUIRES PROTECTION OF PROPERTY VALUES

The PCDR requires that new developments are subject to protecting property values. The 0.72 FAR of BCHD site damages surrounding property by \$100M. The current 0.75 proposed FAR will result in increased property value damage.

P/I LAND USE SHOULD BE USED FOR THE BENEFIT OF REDONDO BEACH RESIDENTS

From a policy perspective, P/I land should be used primarily for the benefit of Redondo Beach residents. Based on BCHD's consultant's work, Kensington (P-CF zoned) likely services 80% non-residents on 3 acres of P/I land. The use of Redondo Beach public land is unsustainable if it is consumed for non-resident use.

BCHD PROPOSED HLC IS 80% to 95% DISTRICT NON-RESIDENTS

BCHD PROPOSED HLC IS 91% to 97% REDONDO NON-RESIDENTS

BCHD's HLC is supermajority benefit of non-residents

RCFE - BCHD's MDS consultant demonstrates 91% non-Redondo Beach resident tenants by zip code for the assisted living

PACE - BCHD's PACE will be 97% non-Redondo Beach resident enrollees.

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From: [Stop BCHD](#)
To: [CityClerk](#); [Planredondo](#); [Planning Redondo](#)
Cc: [\[REDACTED\]](#)
Subject: Fwd: Public Comments - P/I FAR in Draft General Plan
Date: Saturday, March 30, 2024 1:05:51 PM

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

This comment was requested by Mike Jamgochian. Please enter it into the record.

Dear Mayor, Council, Planning Commission, and General Plan Staff:

These comments are being filed at the request of the cc:d party on this email. Please add them to the record of the draft General Plan and the P/I FAR issue. Thank you.

KEEP P/I FAR AT 0.75 BASE AND 1.25 FOR LIMITED CITY OWNED PARCELS

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To: [CityClerk](#); [Planredondo](#); [Planning Redondo](#)
Cc: [\[REDACTED\]](#)
Subject: Fwd: Public Comments - P/I FAR in Draft General Plan
Date: Saturday, March 30, 2024 2:07:14 PM

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

The following comments were requested to be filed with the City and the General Plan by Ms Olmos on her behalf.

Dear Mayor, Council, Planning Commission, and General Plan Staff:

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To: [CityClerk](#); [Planredondo](#); [Planning Redondo](#)
Cc: [REDACTED]
Subject: Fwd: Public Comments - P/I FAR in Draft General Plan
Date: Saturday, March 30, 2024 2:12:00 PM

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

Sent on behalf of Ms. Johnson [REDACTED]

I think it is very unfair to build this massive BCHD project in Redondo Beach on Redondo Beach property. How can you give away city land to a private organization? Also the demolition and construction is going to be very unhealthy to residents. This proposed project should be stopped!

Bethany Johnson
Resident of Redondo Beach

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Subject: Fwd: Public Comments - P/I FAR in Draft General Plan
Date: Saturday, March 30, 2024 5:11:33 PM

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The following comment was requested to be filed with the City by Mr. Dickson:

Dear Mayor, Council, Planning Commission, and General Plan Staff:

For the life of me I can not understand how the BCHD can take land and a Charter that was Created to serve the residents of Redondo, Hermosa and Manhattan and change it to something different that what it was created for!

Dan Dickson
69 year resident of Redondo Beach

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BCHD PROPOSED HLC IS 91% to 97% REDONDO NON-RESIDENTS

BCHD's HLC is supermajority benefit of non-residents with the damages accruing primarily to Redondo Beach resident taxpayers in order for BCHD to service the non-residents.

RCFE - BCHD's MDS consultant demonstrates 91% non-Redondo Beach resident tenants by zip code for the assisted living

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PCDR REQUIRES PROTECTION OF PROPERTY VALUES

The PCDR requires that new developments are subject to protecting property values. The 0.72 FAR of BCHD site damages surrounding property by \$100M. The current 0.75 proposed FAR will result in increased property value damage.

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From: [Stop BCHD](#)
To: [CityClerk](#); [Planredondo](#); [Planning Redondo](#)
Cc: [Lisa Falk](#)
Subject: Fwd: Public Comments - P/I FAR in Draft General Plan
Date: Saturday, March 30, 2024 5:49:49 PM

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

This comment is filed with the City at the request of Ms. Falk:

Dear Mayor, Council, Planning Commission, and General Plan Staff:

These comments are being filed at the request of the cc:d party on this email. Please add them to the record of the draft General Plan and the P/I FAR issue. Thank you.

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From: [Stop BCHD](#)
To: [CityClerk](#); [Planredondo](#); [Planning Redondo](#)
Cc: [\[REDACTED\]](#)
Subject: Fwd: Public Comments - P/I FAR in Draft General Plan
Date: Saturday, March 30, 2024 7:58:10 PM

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

Submitted as public comment regarding the draft General Plan at the request of Ms Yee.

Dear Mayor, Council, Planning Commission, and General Plan Staff:

These comments are being filed at the request of the cc:d party on this email. Please add them to the record of the draft General Plan and the P/I FAR issue. Thank you.

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From: Stop BCHD
To: CityClerk; Planning Redondo; Planredondo
Cc: [REDACTED]
Subject: Fwd: Public Comments - P/I FAR in Draft General Plan
Date: Saturday, March 30, 2024 8:04:01 PM

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Submitted as comments to the General Plan and City Council at the request of Mr Burschinger

Mr. Burschinger commented a desire for the following results in the General Plan:

- FAR 0.75 as base for P/I parcels
- FAR 1.25 for City of Redondo Beach facilities in P/I due to the direct benefit to residents offsetting the damages to surrounding neighborhood

Mr. Burschinger cited the following as some reasons supporting the FAR's above:

- Current loss of nearly \$100M in property value in Redondo Beach within 1/2-mile of P-CF zoned BCHD
- Estimated loss (work underway) for Torrance within 1/2 mile also (expected to be about \$50M)
- Thank you for helping to stop what could be a \$200M loss of property value of surrounding property in Torrance and Redondo if BCHD is allowed to expand from 300K to 792K SQFT and from 99% less than 52-feet high to at least 300,000 sqft of 110-feet above Beryl & Flagler Streets

Mr. Burschinger also supports the following comments:

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From: [Stop BCHD](#)
To: [CityClerk](#); [Planredondo](#); [Planning Redondo](#)
Cc: [REDACTED]
Subject: Fwd: Public Comments - P/I FAR in Draft General Plan
Date: Saturday, March 30, 2024 8:05:40 PM

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

Mr. Earnest supports and files the following comments to the General Plan and Council:

Dear Mayor, Council, Planning Commission, and General Plan Staff:

These comments are being filed at the request of the cc:d party on this email. Please add them to the record of the draft General Plan and the P/I FAR issue. Thank you.

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From: [Stop BCHD](#)
To: [CityClerk](#); [Planredondo](#); [Planning Redondo](#)
Cc: [Lisa Falk](#)
Subject: Fwd: Public Comments - P/I FAR in Draft General Plan
Date: Sunday, March 31, 2024 1:54:26 PM

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The following comment to the City Council of Redondo Beach and the draft General Plan is provided at the request of Ms. Falk:

Dear Mayor, Council, Planning Commission, and General Plan Staff:

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To: [CityClerk](#); [Planredondo](#); [Planning Redondo](#)
Cc: [REDACTED]
Subject: Fwd: Public Comments - P/I FAR in Draft General Plan
Date: Sunday, March 31, 2024 1:59:19 PM

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From: [Stop BCHD](#)
To: [CityClerk](#); [Planredondo](#); [Planning Redondo](#)
Cc: [joyce field](#)
Subject: Fwd: Public Comments - P/I FAR in Draft General Plan
Date: Sunday, March 31, 2024 2:01:28 PM

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Dear Mayor, Council, Planning Commission, and General Plan Staff:

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From: [Stop BCHD](#)
To: [CityClerk](#); [Planredondo](#); [Planning Redondo](#)
Cc: [REDACTED]
Subject: Fwd: Public Comments - P/I FAR in Draft General Plan
Date: Sunday, March 31, 2024 2:04:03 PM

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From: [Stop BCHD](#)
To: [CityClerk](#); [Planredondo](#); [Planning Redondo](#)
Cc: [BARRY SINSHEIMER](#)
Subject: Fwd: Public Comments - P/I FAR in Draft General Plan
Date: Sunday, March 31, 2024 2:14:09 PM

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From: [Stop BCHD](#)
To: [CityClerk](#); [Planning Redondo](#); [Planredondo](#)
Cc: [REDACTED]
Subject: Fwd: Public Comments - P/I FAR in Draft General Plan
Date: Sunday, March 31, 2024 2:17:13 PM

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To: [CityClerk](#); [Planredondo](#); [Planning Redondo](#)
Cc: [REDACTED]
Subject: Fwd: Public Comments - P/I FAR in Draft General Plan
Date: Sunday, March 31, 2024 5:11:36 PM

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Cc: [REDACTED]
Subject: Fwd: Public Comments - P/I FAR in Draft General Plan
Date: Sunday, March 31, 2024 5:14:17 PM

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From: [Stop BCHD](#)
To: [CityClerk](#); [Planredondo](#); [Planning Redondo](#)
Cc: [REDACTED]
Subject: Fwd: Public Comments - P/I FAR in Draft General Plan
Date: Sunday, March 31, 2024 5:19:55 PM

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

These comments were requested to be filed with the Mayor, Council and General Plan staff by Ms. Rogers.

Dear Mayor, Council, Planning Commission, and General Plan Staff:

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From: Stop BCHD
To: CityClerk; Planredondo; Planning Redondo
Cc: [REDACTED]
Subject: Fwd: Public Comments - P/I FAR in Draft General Plan
Date: Sunday, March 31, 2024 6:54:46 PM

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Dear Mayor, Council, Planning Commission, and General Plan Staff:

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To: [CityClerk](#); [Planredondo](#); [Planning Redondo](#)
Cc: [REDACTED]
Subject: Fwd: Public Comments - P/I FAR in Draft General Plan
Date: Sunday, March 31, 2024 6:59:49 PM

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From: [Tim Ozenne](#)
To: [Planredondo](#); [Planning Redondo](#); [CityClerk](#); [Nils Nehrenheim](#); [Paige Kaluderovic](#); [Todd Loewenstein](#); [Scott Behrendt](#); [Zein Obagi](#)
Subject: Fwd: RECENT LETTER TO RB CITY COUNCIL -> Public Comment - P/I FAR OF 0.75 SHOULD BE UNIFORMLY INSTATED
Date: Sunday, March 31, 2024 3:25:26 PM

Some people who received this message don't often get email from [REDACTED] [Learn why this is important](#)

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I fully endorse these Stop BCHD comments below. Please do not increase the FAR above 0.75 for this project.

As RB officials likely know, in 1957 the land for the project was designated only for a hospital for local use. So far as I know, the restriction has never been removed or interpreted to allow other facility types beyond those necessary for a hospital. CA has a process for changing uses of public lands, but it doesn't appear BCHD feels obligated to obtain legal sanction for the change in use. I hope Redondo will enforce CA law with respect to the use of this land.

Thank you,
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[REDACTED]

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

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

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

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

is actually better off with 0.75 than with subjective standards.

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

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

From: ajsams@verizon.net
To: [CityClerk](#); [Planredondo](#); [Planning Redondo](#); [Nils Nehrenheim](#); [Scott Behrendt](#); [Todd Loewenstein](#); [Paige Kaluderovic](#); [Zein Obagi](#)
Subject: Please consider us
Date: Friday, March 22, 2024 11:05:32 AM

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

This over built BCHD development is excessive and too grand for the area. You aren't thinking of the surrounding properties and cities that butt up against it. My beautiful home, in a very quiet, safe neighborhood-friendly part of Torrance will be severely damaged. Not only will we have to live with the noise and pollution as it's being built, but property owners like me will be negatively affected for years to come. We will be living in an over crowded area, there will be more traffic, and our properties will be worth less. No one will buy my house one day when something that big is overshadowing it. Please think about the size and scope of this project. Ask yourself, do you want this in your backyard? Would you like to be surrounded by the noise, pollution, and traffic that this will generate? How would you like your home that you bought with hard work, to be worth less because of something around it? Think about those questions when you go to sleep tonight.

Jennifer Sams

From: Mark Nelson (Home Gmail)
To: Communications; CityClerk; cityclerk@hermosabeach.gov; cityclerk@manhattanbeach.gov; executiveoffice@bos.lacounty.gov; Holly J. Mitchell
Subject: Public Comment - BCHD's Campaign Against Resident Use of P/I Zoned Land
Date: Sunday, March 31, 2024 9:43:56 PM
Attachments: <image.png>

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

Isn't this just PLAIN OLD FALSE ADVERTISING? **IF NOT, WHY NOT?**

BCHD plans to lease 3 PUBLIC ACRES to a 100% PRIVATE COMPANY
**How does giving PUBLIC LAND to a PRIVATE
COMPANY "Preserve Public Space"?**

And if that's not enough – the PRIVATE facility will serve 80% to 95%
NON-RESIDENTS OF THE DISTRICT!



**Use Your Voice to
Safeguard & Preserve
Our Public Spaces**

*Comments on the proposed
Redondo Beach General Plan
Update are due by March 31!*

"PRESERVE PUBLIC SPACE"
DOES NOT AND WILL NOT EVER MEAN
• PRIVITIZATION OF PUBLIC LAND
**• 80% to 95% NON-RESIDENT
SERVICES**

From: Mark Nelson (Home Gmail)
To: Communications: City Clerk: cityclerk@hermosabeach.gov; cityclerk@manhattanbeach.gov
Cc: Holly J. Mitchell; executiveoffice@bos.lacounty.gov; Jane Diehl; Noel Chuny; Martha Koo; Michelle Bholat; Nils Nehrenheim; Paige Kaluderovic; Todd Loewenstein; Scott Behrendt; Zein Obagi; City Council
Subject: Public Comment - BCHD's Proposed NON-RESIDENT HLC
Date: Sunday, March 24, 2024 2:02:51 PM
Attachments: BCHD Quick Facts.png

Some people who received this message don't often get email from [REDACTED] [Learn why this is important](#)

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Public Comment - Mayors, Councils, Planning Commissions, City Counsels of Redondo Beach, Hermosa Beach, and Manhattan Beach

Note: BCHD is planning to use 100% public owned and zoned land to service a supermajority of non-residents of the District in a large Overdevelopment nested 30-feet above Redondo Beach and Torrance homes.

QUICK FACTS ABOUT BCHD'S OVERDEVELOPMENT PLAN

TOO BIG

+254% sf

TOO TALL

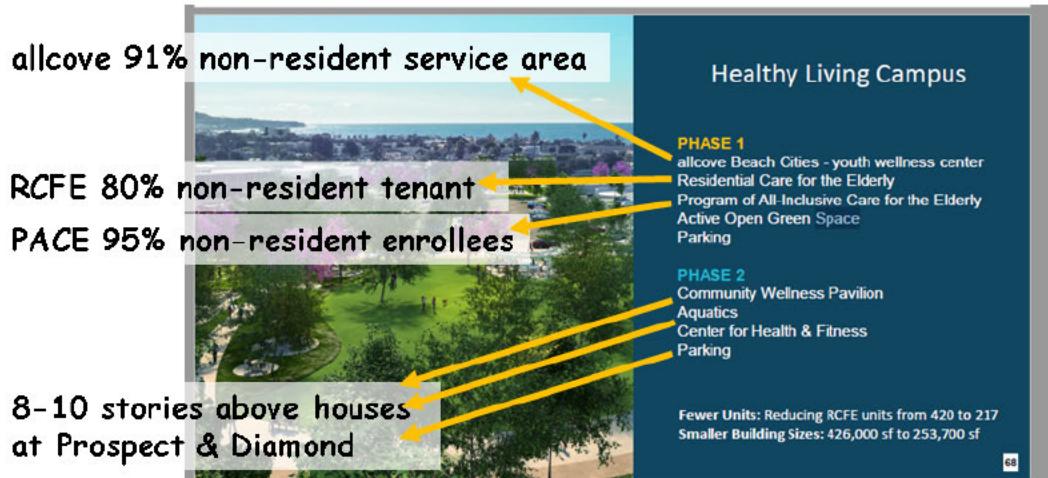
Current campus buildings = 312,000 sf Current = 99.7% under 52 ft tall
Phase 1+2 building = 792,000 sf Phase 1+2 = 100% **above** 66 ft tall

80% to 95% NON-RESIDENT SERVICES

allcove = 91% non-resident service area (per LA County)

RCFE = 80% non-resident tenants (per BCHD MDS report)

PACE = 95% non-resident enrollees (per Natl PACE Assoc)



From: [Mark Nelson \(Home Gmail\)](#)
To: [CityClerk](#)
Subject: Public Comment - City Council
Date: Saturday, March 30, 2024 8:13:23 PM

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

As a participant in the Council's work session on the General Plan, I would like to offer that my recollection, and that our our team that was on the video conference, was that the 0.75 base FAR was proposed, and amendments were offered to increase the 2 specific City parcels. There was not downzoning as suggested by a number of advocates for BCHD's development.

I have pasted Councilmember Obagi's quote from the Easy Reader below. While a fine point, I believe we need to accurately represent that the carve out for city property and a greater FAR was a change to the 0.75 base FAR for P/I. There was no downzoning.

“We’re a built-out community. Land is a tough commodity in Redondo Beach,” said GPAC vice chairman Sanchez. “I think (the F.A.R.) needs to be the same throughout for Public Institutional zones. That’s my opinion.”

City Councilman Zein Obagi, Jr., concurred.

“It seems like all Public Institutional should be the same, not hand-selected for reduced F.A.R. (sic),” he said.

Furthermore, I can support a 0.75 FAR for all P/I land use, although we have a number of members and supports that prefer 0.5 FAR across all P/I

Mark Nelson
Redondo Beach

From: [Mark Nelson \(Home Gmail\)](#)
To: [CityClerk](#); [Kevin Cody](#)
Cc: [Nils Nehrenheim](#); [Paige Kaluderovic](#); [Scott Behrendt](#); [Todd Loewenstein](#); [Zein Obagi](#)
Subject: Public Comment - Continued Misrepresentations by GPAC Members and Chairs regarding when the P/I FARs were included in the draft plan
Date: Saturday, March 30, 2024 6:21:13 PM

Some people who received this message 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.

Over and over now, GPAC members, including a chair have misrepresented the plain facts of the FAR for P/I in the draft General Plan.

In the Easy Reader, there's this inaccuracy, "When we received the draft, at our final GPAC meeting (Jan. 30), staff pointed it out to us. 'Hey, this is in the document now,'" said GPAC Vice Chair Sanchez."

A single 2-minute search of the GPAC 2022 meeting agendas shows that March, August and September draft General Plans all contained the 0.75 and 1.25 FARs for P/I in their Agenda Packets. So this obvious misrepresentation by GPAC members and chairs is either intentional and perhaps gaslighting orchestrated by BCHD, or, it's a result of many GPAC members choosing not to read three agenda packets that were provided to them and the public.

And the P/I FARs were also included in comments to the GPAC by a fellow GPAC member, so not all members skipped reading their materials. In 2023 the City also published the P/I FARs in its CEQA EIR Notice of Preparation. So there were at least four publications in 2022 and 2023 containing the information. In addition, BCHD had a paid consultant as the GPAC Chair, so surely he had a fiduciary responsibility to his client to read and report on the materials?

Whether the P/I FAR remains 0.75 in general and 1.25 for City of Redondo Beach resident-focused development on limited parcels, or, if the P/I FAR is reduced to 0.75 for all P/I parcels in order to protect surrounding neighborhoods and property values is irrelevant at this point. What is relevant is that GPAC was provided the P/I FARs three meetings in a row and it appears that only 1 of the 26 members read and commented.

Mark Nelson
Redondo Beach

From: [Mark Nelson \(Home Gmail\)](#)
To: [CityClerk](#)
Subject: Public Comment - Mayor and Council
Date: Saturday, March 30, 2024 8:35:29 PM

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

I would like to point out the following from a review of the GPAC record demonstrating that any claim by a GPAC member that the P/I FAR had been "hidden" is erroneous. The FAR for P/I appeared throughout the assigned committee reading materials for the last 3 meetings of 2022.:

The P/I FAR of 0.75 base and 1.25 for specific City-owned parcels was first presented to the GPAC in the March 31, 2022 meeting materials. It appears in slide 10 of the meeting presentation from the Agenda packet.

The P/I FAR was presented and unchanged in both the August 31, 2022 and September 29, 2022 meeting materials.

In advance of the August 31, 2022 meeting, both member (now Mayor) Light and Member Lamb submitted comments on land use using the section that was presented to the GPAC that included the P/I FAR recommendation of 0.75 and 1.25. Neither submitted specific comments on P/I, however both did provide comments and section mark ups.

From: [Stop BCHD](#)
To: [CityClerk](#); [Planredondo](#); [Nils Nehrenheim](#); [Zein Obagi](#); scott.berhendt@redondo.org; [Paige Kaluderovic](#); [Todd Loewenstein](#)
Cc: [McGarry Family](#)
Subject: Public Comment - P/I FAR in Draft General Plan
Date: Saturday, March 30, 2024 11:12:08 AM

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

Dear Mayor, Council, Planning Commission, and General Plan Staff:

These comments are being filed at the request of Mr. McGarry.. Please add them to the record of the draft General Plan and the P/I FAR issue. Thank you.

KEEP P/I FAR AT 0.75 BASE AND 1.25 FOR LIMITED CITY OWNED PARCELS

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

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

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

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

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

PUBLIC NOTICE OF THE 0.75 / 1.25 PROPOSAL WAS REPEATED MADE TO GPAC

City Staff and Council provided the FAR 0.75 base FAR and 1.25 limited FAR to the

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

IF THE 0.75 / 1.25 PROPOSAL IS NOT SUSTAINABLE, ROLL BACK P/I to 0.75 FAR

For the protection of the surrounding public, the City should roll back the FAR for P/I to 0.75 uniformly if it concludes that FAR 1.25 for specific Redondo Beach resident-taxpayer owned is indefensible on the grounds of benefits to residents of Redondo Beach.

BCHD PLANS TO PRIVATIZE P/I LAND USE THROUGH 95 YEAR CONTRACTS

It's not at all clear that BCHD intends to use the P-CF zoning for PUBLIC use. It appears that BCHD plans to lease 3 acres to a 100% private entity for 95 years for commercial use. BCHD's estimates show that 80% of the use will be by non-residents. <https://www.stopbchd.com/post/only-bchd-preserve-public-space-by-leasing-it-to-a-100-private-developer-for-95-years>

CURRENT P-CF INDUCED PROPERTY VALUE DAMAGES EXCEED \$150M

Consolidated property damage values from existing 0.72 FAR P-CF site on RB/Torrance border:

\$97M Redondo Beach property value declines within 1/2-mile
\$65M Torrance property value declines within 1/2-mile

LOCAL REDONDO BEACH RESIDENTS SUFFER NEARLY \$100M IN PROPERTY VALUE DECLINE WITHIN ½-MILE OF THE BCHD PARCEL AND HIGHER FAR DEVELOPMENT WILL CREATE MORE DAMAGES

The property value decline (\$97M) in Redondo Beach surrounding the 312,000 sf, 99.7% under 52-foot tall campus is estimated by econometric models and the dataset used by BCHD's MDS consultants for market analysis (purchased and licensed by StopBCHD). <https://www.stopbchd.com/post/redondo-beach-property-value-loss-within-1-2-mile-of-bchd-campus-over-97m-2024-update>

The impact of being within 1/2-mile of BCHD campus has been estimated for Torrance residences, using the Redondo Beach model as a proxy. The property value damage from proximity to the 312,000 sf, 99.7% under 52-foot tall existing campus is \$65M. Greater FARs and denser development will undoubtedly create larger losses for surrounding property values and property owners.

PCDR REQUIRES PROTECTION OF PROPERTY VALUES

The PCDR requires that new developments are subject to protecting property values. The 0.72 FAR of BCHD site damages surrounding property by \$100M. The current 0.75 proposed FAR will result in increased property value damage.

P/I LAND USE SHOULD BE USED FOR THE BENEFIT OF REDONDO BEACH RESIDENTS

From a policy perspective, P/I land should be used primarily for the benefit of Redondo Beach residents. Based on BCHD's consultant's work, Kensington (P-CF zoned) likely services 80% non-residents on 3 acres of P/I land. The use of Redondo Beach public land is unsustainable if it is consumed for non-resident use.

BCHD PROPOSED HLC IS 80% to 95% DISTRICT NON-RESIDENTS

BCHD PROPOSED HLC IS 91% to 97% REDONDO NON-RESIDENTS

BCHD's HLC is supermajority benefit of non-residents

RCFE - BCHD's MDS consultant demonstrates 91% non-Redondo Beach resident tenants by zip code for the assisted living

PACE - BCHD's PACE will be 97% non-Redondo Beach resident enrollees.

allcove - BCHD's allcove services LA County SPA8 (1.4M population) and is 95% non-Redondo Beach residents.

While the damages of P/I fall entirely to Redondo Beach, the benefits of BCHD proposed HLC accrue to 91% to 97% non-Redondo Beach residents.

Residents should NOT have damages to service NON-RESIDENTS on P/I land

CITY RESIDENT-TAXPAYER OWNED SITES SHOULD NOT REQUIRE PCDR REVIEW

Sites developed by the City of Redondo Beach for the majority benefit of residents should not require a PCDR process. They should be assumed compliant.

It should be explicitly stated that P/I land use should be for at least a majority benefit of the residents of Redondo Beach. The damages accrue 100% to Redondo Beach residents, therefore, they should receive a minimum level of a majority of benefits from the land use.

THE CURRENT P-CF BCHD SITE IS NON-CONFORMING WITH ITS CUP

At least one P/I site, the BCHD campus, no longer has a hospital, therefore, "associated medical" are no longer permitted uses. They can be allowed to remain until their natural sunset lifespans.

OBJECTIVE NUMERICAL FARs ARE REQUIRED

The State mandate for objective (not subjective) standards requires the city abandon the PCDR chosen FAR and it be replaced by objective standards. This proposal is consistent with State mandate.

BCHD HAD A PAID CONSULTANT AS CHAIR OF THE GPAC

Nick Biro was the Chair of GPAC and a \$10,000 to \$15,000 per month retained consultant of BCHD. Mr. Biro had both a GPAC obligation and a fiduciary taxpayer obligation via his BCHD to review all draft General Plan documents and provide comments timely.

THREE GPAC MEETINGS PUBLICIZED THE FAR PROPOSAL

March, August and September 2022 GPAC meetings and 2024 CEQA NOP for GP all included public notice of the P/I proposed 0.75 and 1.25 FAR.

The full content of each of the following html links is also entered into the formal record, in the same way as attached files would be under California law:
<https://www.stopbchd.com/post/the-redondo-beach-general-plan-far-for-p-i-land-use-is-appropriate-and-should-not-be-changed>

<https://www.stopbchd.com/post/where-is-the-city-s-or-bchd-s-analysis-of-the-property-value-damages-from-the-current-bchd-developme>

<https://www.stopbchd.com/post/redondo-beach-property-value-loss-within-1-2-mile-of-bchd-campus-over-97m-2024-update>

<https://www.stopbchd.com/post/torrance-property-value-loss-within-1-2-mile-of-bchd-campus-is-65m>

<https://www.stopbchd.com/post/stop-bchd-s-high-density-commercial-development-on-public-zoned-land>

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

From: [Stop BCHD](#)
To: [Planredondo](#); [Planning Redondo](#); [CityClerk](#); [Nils Nehrenheim](#); [Paige Kaluderovic](#); [Todd Loewenstein](#); [Scott Behrendt](#); [Zein Obagi](#)
Subject: Public Comment - P/I FAR OF 0.75 SHOULD BE UNIFORMLY INSTATED
Date: Thursday, March 28, 2024 1:57:05 PM

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

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

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

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

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

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

--

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From: StopBCHD
To: Communications, City Clerk
Subject: Public Comment: BCHD FACT CHECK - FALSE
Date: Monday, April 1, 2024 9:16:46 AM
Attachments: image.png

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

Public Comment - Mayor, Council, Planning Commission, General Plan Staff

BCHD ASSERTS:

The change specifically sets a 0.75 FAR on BCHD's campus while allowing a 1.25 FAR for other public or institutional land use designations. The proposed 0.75 FAR equals less than Phase I of the District's Healthy Living Campus Plan, which would significantly limit the ability to modernize our campus and would compromise the ability to provide preventive health programs and services to the community.

THE FACTS STATE

BCHD's parcel current has no FAR based on antiquated subjective planning standards. The State-mandated objective standards require a numerical value.

All Public/Institutional Land Uses have a 0.75 FAR. In the case of two specific parcels owned by the City of Redondo Beach and its resident-taxpayers, the City is proposing a 1.25 FAR. Unlike BCHD which plans to service a supermajority of non-residents in the Healthy Living Campus, City of Redondo Beach development is for the benefit of resident-taxpayers, not non-resident/non-taxpayers.

BCHD NON-RESIDENT/NON-TAXPAYER TARGET SERVICE AREA

alcove - 91% non-District, 95% non-Redondo Beach Service Area (per LA County SPA8)

PACE - 95% non-District, 97% non-Redondo Beach enrollees (per Natl PACE Assoc statistics and US Census)

Assisted Living - 80% non-District, 91% non-Redondo Beach tenants (per BCHD MDS consultant report by zip code analysis)

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From: [Stop BCHD](#)
To: [CityClerk](#); [Planredondo](#)
Subject: Public Comments - Redondo Beach General Plan
Date: Thursday, March 28, 2024 6:33:36 PM

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

"Comment"
StopBCHD Community Comment

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StopBCHD Group Comment

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StopBCHD Group Comment

BCHD's HLC is supermajority benefit of non-residents

RCFE - BCHD's MDS consultant demonstrates 91% non-Redondo Beach resident tenants by zip code for the assisted living

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allcove - BCHD's allcove services LA County SPA8 (1.4M population) and is 95% non-Redondo Beach residents.

While the damages of P/I fall entirely to Redondo Beach, the benefits of BCHD proposed HLC accrue to 91% to 97% non-Redondo Beach residents.

Residents should NOT have damages to service NON-RESIDENTS on P/I land

StopBCHD Group Comment

Sites developed by the City of Redondo Beach for the majority benefit of residents should not require any an PCDR process. They should be assumed compliant.

StopBCHD Group Comment

It should be explicitly stated that P/I land use should be for at least a majority benefit of the residents of Redondo Beach. The damages accrue 100% to Redondo Beach residents, therefore, they should receive a minimum level of a majority of benefits from the land use.

StopBCHD Group Comment

At least one P/I site, the BCHD campus, no longer has a hospital, therefore, "associated medical" are no longer permitted uses. They can be allowed to remain until their natural sunset lifespans.

StopBCHD Group Comment

The State mandate for objective (not subjective) standards requires the city abandon the PCDR chosen FAR and it be replaced by objective standards. This proposal is consistent with State mandate.

StopBCHD Group Comment

Nick Biro was the Chair of GPAC and a \$10,000 to \$15,000 per month retained consultant of BCHD. Mr. Biro had both a GPAC obligation and a fiduciary taxpayer obligation via his BCHD to review all draft General Plan documents and provide comments timely.

StopBCHD Group Comment

March, August and September 2022 GPAC meetings and 2024 CEQA NOP for GP all included public notice of the P/I proposed 0.75 and 1.25 FAR.

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

From: Stop BCHD
To: Planredondo; CityClerk
Subject: Re: Public Comment supporting FAR 0.75 maximum for based P/I land use
Date: Tuesday, March 26, 2024 8:12:32 PM

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

Document link reproduced as a PUBLIC COMMENT.

The Redondo Beach General Plan FAR for P/I Land Use is Appropriate and Should NOT BE CHANGED

BCHD has made the FAR issue about itself.

Thus, it is appropriate to use BCHD as an example of how larger FARs damage local residents while providing benefits to a supermajority of non-residents.

The Redondo Beach General Plan should maintain 0.75 FAR for most P/I land uses and continue to allow 1.25 FAR for City of Redondo Beach development that benefits a majority or exclusivity of resident-taxpayers of Redondo Beach.

FAR is Floor Area Ratio and it is calculated as SQFT of building/SQFT of lot. For example, the current BCHD site has 312,000 sqft of buildings on a 433,422 sqft parcel with an FAR of $312000/433422 = 0.72$. (BCHD data from BCHD's Notice of Preparation for its Environmental Impact Report.)

Residential Torrance property within 1/2-mile of the exiting campus has a reduced value of \$65M

<https://www.stopbchd.com/post/torrance-property-value-loss-within-1-2-mile-of-bchd-campus-is-65m>

Residential Redondo Beach property within 1/2-mile of the exiting campus has a reduced value of \$97M

<https://www.stopbchd.com/post/redondo-beach-property-value-loss-within-1-2-mile-of-bchd-campus-over-97m-2024-update>

BCHD acknowledges it damages surrounding neighborhoods, but has conducted no analysis.

<https://www.stopbchd.com/post/where-is-the-city-s-or-bchd-s-analysis-of-the-property-value-damages-from-the-current-bchd-developme>

<https://www.stopbchd.com/post/bchd-ministry-of-propaganda-series-bchd-doesn-t-know-if-residents-can-afford-the-pmb-assisted-livin>

Increasing P/I FAR will increase damages to surrounding property owners and property value.

As one example, BCHD is currently FAR 0.72. If allowed to increase to FAR 1.25 or greater, the value of surrounding property will decay further. BCHD's HLC will service 91% to 97% non-residents of Redondo Beach.

There is no spot zoning issue as BCHD is attempting to fabricate.

BCHD is not the only parcel to receive a base FAR of 0.75. All other parcels in the P/I land use are proposed as FAR 0.75, except two lone City Parcels that are reserved for City development for RESIDENT-TAXPAYER benefit.

BCHD's proposed Healthy Living Campus is for supermajority non-resident use.

Whether we consider non-residents of Redondo Beach or non-residents of the health district, BCHD's plan is for a supermajority of non-resident enrollees in PACE, a supermajority of non-resident service area in alcove, and a supermajority non-resident tenancy for the assisted living.

BCHD's HLC statistics demonstrate its non-resident use.



BCHD's 100% private development of assisted living will deprive residents of 3 acres of public land for 95 years.

BCHD is planning to lease 3 acres of public P/I land to a 100% private firm (PMB LLC) where BCHD will have 0% ownership. PMB LLC will lease to a supermajority of non-residents at excessive market rates, thereby depriving residents of the value of the land.

BCHD's 100% private assisted living will cost up to one-quarter million dollars per year per room in rent.
<https://www.stopbchd.com/post/do-you-have-176k-to-254k-each-year-from-social-security-iras-401ks-and-savings>

BCHD's PACE facility will service 95% to 97% non-residents of the District and Redondo Beach on 100% taxpayer public land.

<https://www.stopbchd.com/post/bchd-and-its-80-to-95-non-resident-services-plan>

BCHD's allcove is 91% non-resident service area of the District and 95% non-resident service area of Redondo Beach.

<https://www.stopbchd.com/post/bchd-ministry-of-propaganda-series-allcove-isn-t-paying-its-fair-share-of-district-support-costs>

allcove's 91% non-resident service area will pay no rent for a minimum of 30 years on the \$4M fair market value taxpayer owned-lot at Flagler & Beryl

As BCHD continues its campaign of using public assets for non-resident services, even the C-2 lot owned by taxpayers of the District will lose 30 years of value and revenue to 91% non-residents.

<https://www.stopbchd.com/post/bchd-ministry-of-propaganda-series-allcove-isn-t-paying-its-fair-share-of-district-support-costs>

PROTECT REDONDO BEACH PUBLIC LAND - SUPPORT FAR 0.75 TO KEEP REDONDO LAND FOR RESIDENTS

On Tue, Mar 26, 2024 at 8:10 PM Stop BCHD <stop.bchd@gmail.com> wrote:

Public comment to PlanRedondo General Plan and Redondo Beach Council and Planning Commission

See below. All content at all links are entered into the public record.

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

From: **Stop BCHD** <stop.bchd@gmail.com>

Date: Tue, Mar 26, 2024 at 8:08 PM

Subject: Public Comment supporting FAR 0.75 maximum for based P/I land use

To: Stop BCHD <stop.bchd@gmail.com>

For convenience, we have published our comments as a link. Feel free to send this to CityClerk@redondo.org and PlanRedondo@redondo.org as a public comment for the Redondo Beach General Plan.

<https://www.stopbchd.com/post/the-redondo-beach-general-plan-far-for-p-i-land-use-is-appropriate-and-should-not-be-changed>

Also, feel free to email StopBCHD+FAR75@gmail.com and we'll file comments on your behalf.

Last, we have also filed comments on the Plan Redondo website in the interactive document at <https://redondo.konveio.com/focused-general-plan-update>. Those comments were exported and are attached to this email as a PDF.

THANKS TO EVERYONE FOR SUPPORTING REASONABLE DEVELOPMENT FOR RESIDENT BENEFIT!

Save our PUBLIC PROPERTY for the PUBLIC - not for LEASES TO PRIVATE COMPANIES for 95 years - not for FREE USE of 91% NON-RESIDENT service areas (that's the COUNTY'S job!)

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

From: [Stop BCHD](#)
To: [CityClerk](#); [cityclerk@torranceca.gov](#); [Planredondo](#); [Planning Redondo](#)
Cc: [Kevin Cody](#); [lisa.jacobs@scng.com](#)
Subject: Public Comment: Redondo Beach Interface with Torrance Hillside Overlay Area
Date: Tuesday, April 2, 2024 11:36:56 AM
Attachments: [image.png](#)
[Comments of StopBCHD on Torrance Hillside Overlay and PI Land Use.pdf](#)

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

TO: Redondo Beach and Torrance Mayors, Councils, Planning Commissions, City Counsel; Redondo Beach General Plan Comments

The attached comments highlight the Torrance Hillside Overlay (THO) that is a protective measure in the Torrance Municipal Code (TMC). In the specific case of Redondo Beach, the TMC THO is applied from Beryl St, south on Flagler and Flagler Alley, and continues south on Tomlee. A map is included in the attachment.

Specifically, there are a number of limits on development and development impacts on property in the THO that we recommend be incorporated into the Redondo Beach General Plan Update to create a Redondo Beach-Torrance interface overlay for non-residential property. This overlay would use THO development requirements and be applied to non-residential parcels in Redondo Beach that adjoin the THO areas in Torrance.

Please include this email and the attached comments in full in the public record and in the public comments to the current draft Redondo Beach General Plan update.

ATTACHED COMMENTS PASTED BELOW FOR CONVENIENCE AND SEARCHABILITY ONLY - PLEASE USE ATTACHED PDF FOR OFFICIAL COMMENT

P/I, P-CF Specific Land Use Issues Under the Torrance Hillside Overlay

RECOMMENDATION

The City of Redondo Beach has indicated it seeks to consider the land use and zoning of adjoining cities as it revises its General Plan. In the case of at least one large Public/Institutional (P/I) land use that is a currently P-CF zoned parcel, the adjacent Torrance land is residential and in the Torrance Hillside Overlay (THO).

As a result of the THO, significant limitations should be considered for the P/I P-CF parcel, including:

- No adverse impact on view, light, air, or privacy
- Minimize intrusion
- Harmony with THO property
- No negative impact on property values

- No adverse cumulative impact
- Not exceed 14-feet in height
- No adverse impact or significant controversy

These considerations based on the adjoining THO area are recommended to be incorporated into a Redondo Beach overlay that is applied to non-residential Redondo Beach property adjacent to THO areas.

DISCUSSION

The Torrance Hillside Overlay (THO) map clearly shows that the entirety of Flagler from Beryl to Towers, and through Flagler Alley, is governed under the THO.



Development under the THO is constrained by the long-standing Torrance Municipal Code (TMC) section, the full text of which is available at [ARTICLE 41 - R-H HILLSIDE AND LOCAL COASTAL OVERLAY ZONE](#). For convenience, the THO is reproduced at the end of this document and is thereby entered into the Redondo Beach General Plan, City Council, and Planning Commission records.

The THO has a number of specific requirements that are best extracted verbatim for discussion. **In summary, if the adjacent Redondo Beach P/I Land Use (P-CF zoning) were in Torrance, it would be required by the THO to conform to the following:**

- No adverse impact on view, light, air, or privacy
- Minimize intrusion
- Harmony with other property

- **No negative impact on property values**
- **No adverse cumulative impact**
- **Not exceed 14-feet in height**
- **No adverse impact or significant controversy**

91.41.6 PLANNING AND DESIGN.

(Amended by O-3477)

No construction and no remodeling or enlargement of a building or structure shall be permitted unless the Planning Commission (or the City Council on appeal) shall find that the location and size of the building or structure, or the location and size of the remodeled or enlarged portions of the building or structure, have been planned and designed in such a manner as to comply with the following provisions:

NO ADVERSE IMPACT ON VIEW, LIGHT, AIR OR PRIVACY

a) *The proposed development will not have an adverse impact upon the view, light, air and privacy of other properties in the vicinity;*

MINIMIZE INTRUSION

b) *The development has been located, planned and designed so as to cause the least intrusion on the views, light, air and privacy of other properties in the vicinity;*

HARMONY WITH OTHER PROPERTY IN THE VICINITY

c) *The design provides an orderly and attractive development in harmony with other properties in the vicinity;*

NO HARMFUL IMPACT ON LAND VALUES IN THE VICINITY

d) *The design will not have a harmful impact upon the land values and investment of other properties in the vicinity;*

NOT DETERIMENTAL TO OTHER PROPERTIES IN THE VICINITY

e) *Granting such application would not be materially detrimental to the public welfare and to other properties in the vicinity;*

NO ADVERSE CUMULATIVE IMPACT

f) *The proposed development will not cause or result in an adverse cumulative impact on other properties in the vicinity.*

91.41.8 PERMITTED DEVELOPMENT - COMMERCIAL.

Notwithstanding the provisions of this Article, no Precise Plan shall be required if the proposed development within the Hillside and Coastal Overlay zone is for the purpose of constructing, remodeling or enlarging a commercial building, located in a commercial zone, if the following requirements are met:

a) *In the case of remodeling or enlargement of a building, the net interior area of the resulting building will not be increased by more than fifty percent (50%) as a result of the remodeling or enlargement;*

b) *The commercial building (or in the case of remodeling or enlargement, the portion remodeled or enlarged) will be one (1) story; and provided, further, that in the event the commercially zoned lot adjoins any lot used for residential purposes, no portion of the roof (or in the event of remodeling or enlargement, no portion of the remodeled or enlarged roof) will be used as a deck, sun-deck or patio, nor will any equipment or appurtenances be mounted on the roof, protrude through the roof, or extend above the roof, or extend above the roof eave line (except for ordinary plumbing or*

heating vents);

NOT EXCEED 14-FEET IN HEIGHT

c) No portion of the building, in the case of new construction, will exceed fourteen (14) feet in height, measured from the ground at finished grade, but not including any berm. In the case of remodeling or enlargement, the portion remodeled or enlarged shall not exceed fourteen (14) feet in height, measured from finished grade, but not including any berm, or shall not exceed the height of the lowest portion of the remainder of the building, whichever is less. Ordinary plumbing or heating vents, as provided for in subsection b) of this section shall not be considered in the height measurement.

NO ADVERSE EFFECT OR CONTROVERSY

d) The Planning Director has determined that the proposed development will not have an adverse effect on other properties in the vicinity, and there is no significant public controversy thereon.

FULL TEXT OF THO

ARTICLE 41 - R-H HILLSIDE AND LOCAL COASTAL OVERLAY ZONE

(Added by O-2747; Amended by O-2760; O-2961; O-2982; O-3027; O-3110, O-3126, O-3144)

91.41.1 HILLSIDE AND COASTAL ZONE.

- a) The Hillside and Local Coastal Overlay Zone shall consist of the area designated in the maps attached following this Article, marked Exhibits A, B and C to this section, which are incorporated in this Code by this reference.
- b) The provisions of this Article shall apply to all properties within the Overlay Zone in addition to the requirements of the underlying zone, except as provided in this Article. No permits shall be issued for development in the Hillside and Coastal Zone unless the requirements of this Article have been met.

91.41.2 APPLICATION OF PREEXISTING ZONE.

Nothing contained in this Article shall be deemed to repeal any provision of this Code, and the requirements of all preexisting zones in existence in the area encompassed by this Overlay Zone shall be and remain in full force and effect in addition to the requirements of the Overlay Zone, except that the requirements of the Overlay Zone shall be applied where the requirements and standards contained therein are more restrictive than those of the preexisting underlying zones.

91.41.3 LOT DIMENSIONS.

(Amended by O-3283)

Residential lots within the Overlay Zone shall provide a minimum lot width of fifty (50) feet for interior lots or sixty (60) feet for exterior lots, plus one (1) foot for each one percent (1%) slope in excess of fifteen percent (15%) based on existing grade or finished grade, whichever is more restrictive.

91.41.4 PUBLIC HEARING.

- a) Upon receipt of the complete application, the Planning Director shall set a date, time and place for a public hearing thereon as soon as practicable and shall send notice thereof to the owners of land included within a three hundred (300) foot radius of the exterior boundaries of the land for which the permit is sought as shown on the last equalized assessment roll. The Planning Commission may conduct said hearing in an informal manner. The rules of evidence shall not apply. The hearing may be adjourned to a future time at the discretion of the Planning Commission without the

giving of further notice, other than announcement by the Commission of the date, time and place of such adjourned meeting at the time of said adjournment.

b) The applicant shall have the burden of proving that all the requirements of this Article have been met.

c) The Planning Commission may consider all measures which are proposed by the project proponents to be included in the project and other measures that are not included but could reasonably be expected to reduce the adverse impacts of the project, if required as conditions.

91.41.5 PRECISE PLAN.

a) Any development on a lot within the Hillside and Coastal Zone shall be subject to approval by the Planning Commission of a Precise Plan in accordance with Chapter [6](#) of this Division [9](#), except as provided in Sections [91.41.7](#), [91.41.8](#), and [91.41.14](#) of this Article.

b) Nothing in this chapter shall be construed to permit the restrictions which are less restrictive than established in the this Code, or in the California Coastal Act as to those properties lying westerly of Palos Verdes Boulevard in the Coastal Zone as defined by the California Coastal Act.

c) Nothing in this Article shall be construed to authorize the Planning Commission to impose conditions more restrictive than the express provisions of this Code or the California Coastal Act as to those properties lying westerly of Palos Verdes Boulevard in the Coastal Zone as defined in the California Coastal Act when so doing would render construction on any lot impossible where such construction would be possible in accordance with the Code as written.

d) The requirements, restrictions and conditions of the California Coastal Act, commencing at Section [30000](#) of the Public Resources Code of the State of California and any implementing regulations authorized by law, are incorporated by this reference as to the properties lying westerly of Palos Verdes Boulevard in the Coastal Zone as defined in the California Coastal Act.

91.41.6 PLANNING AND DESIGN.

(Amended by O-3477)

No construction and no remodeling or enlargement of a building or structure shall be permitted unless the Planning Commission (or the City Council on appeal) shall find that the location and size of the building or structure, or the location and size of the remodeled or enlarged portions of the building or structure, have been planned and designed in such a manner as to comply with the following provisions:

a) The proposed development will not have an adverse impact upon the view, light, air and privacy of other properties in the vicinity;

b) The development has been located, planned and designed so as to cause the least intrusion on the views, light, air and privacy of other properties in the vicinity;

c) The design provides an orderly and attractive development in harmony with other properties in the vicinity;

d) The design will not have a harmful impact upon the land values and investment of other properties in the vicinity;

e) Granting such application would not be materially detrimental to the public welfare and to other properties in the vicinity;

f) The proposed development will not cause or result in an adverse cumulative impact on other properties in the vicinity.

91.41.7 PERMITTED DEVELOPMENT - RESIDENTIAL.

Notwithstanding the provisions of this Article, no Precise Plan shall be required if the proposed development within the Hillside and Coastal Overlay Zone is for the purpose of constructing, remodeling or enlarging a dwelling, provided the following requirements are met:

- a) The net interior area of the completed dwelling, whether it is new construction or remodeled or enlarged, including the area of the garage, whether attached or detached, will not exceed fifty percent (50%) of the area of the lot or parcel on which the dwelling is located;
- b) The dwelling (or in the case of remodeling or enlargement, the portion remodeled or enlarged) will be one (1) story; and provided further that no portion of the roof of the dwelling (or in the case of remodeling or enlargement, no portion of the remodeled or enlarged roof) will be used as a deck, sun-deck or patio, nor will any equipment or appurtenances be mounted on the roof or protrude through the roof (except for ordinary plumbing or heater vents) nor extend above the roof eave line; provided further that a chimney will be permitted if the portion extending above the roof eave line is no larger than the minimum dimensions required by the Torrance Building Code.
- c) Except as provided in this subsection, no portion of the dwelling, in the case of new construction, will exceed fourteen (14) feet in height, measured from the ground at finished grade, but not including any berm. In the case of remodeling or enlargement, the portion remodeled or enlarged shall not exceed the height of the lowest portion of the remainder of the dwelling, or fourteen (14) feet measured from the ground at finished grade, but not including any berm, whichever is less. In the case of a down-sloping lot, no portion of the dwelling shall exceed fourteen (14) feet in height, measured from the top of the curb at the center point of the front property line. Vents and a chimney, as provided in subsection b) of this section, shall not be considered in the height measurements.
- d) The Planning Director has determined that the proposed development will not have an adverse effect on other properties in the vicinity, and there is no significant public controversy thereon.

91.41.8 PERMITTED DEVELOPMENT - COMMERCIAL.

Notwithstanding the provisions of this Article, no Precise Plan shall be required if the proposed development within the Hillside and Coastal Overlay zone is for the purpose of constructing, remodeling or enlarging a commercial building, located in a commercial zone, if the following requirements are met:

- a) In the case of remodeling or enlargement of a building, the net interior area of the resulting building will not be increased by more than fifty percent (50%) as a result of the remodeling or enlargement;
- b) The commercial building (or in the case of remodeling or enlargement, the portion remodeled or enlarged) will be one (1) story; and provided, further, that in the event the commercially zoned lot adjoins any lot used for residential purposes, no portion of the roof (or in the event of remodeling or enlargement, no portion of the remodeled or enlarged roof) will be used as a deck, sun-deck or patio, nor will any equipment or appurtenances be mounted on the roof, protrude through the roof, or extend above the roof, or extend above the roof eave line (except for ordinary plumbing or heating vents);
- c) No portion of the building, in the case of new construction, will exceed fourteen (14) feet in height, measured from the ground at finished grade, but not including any

berm. In the case of remodeling or enlargement, the portion remodeled or enlarged shall not exceed fourteen (14) feet in height, measured from finished grade, but not including any berm, or shall not exceed the height of the lowest portion of the remainder of the building, whichever is less. Ordinary plumbing or heating vents, as provided for in subsection b) of this section shall not be considered in the height measurement;

d) The Planning Director has determined that the proposed development will not have an adverse effect on other properties in the vicinity, and there is no significant public controversy thereon.

91.41.9 DEVELOPMENT STANDARDS.

a) For slope control:

- 1) All structures shall have roof drainage directed to the street or other approved drainageways by approved methods;
- 2) All excavations, paving, hillside and slope earthwork construction, landscaping and grading, including fills and embankments, shall meet building and grading Code requirements;

b) For safety, general welfare, aesthetic control, and to help stabilize land values and investments;

- 1) Stilt-type structures shall be constructed in such a way that there is no exposure to public view of plumbing, electrical, mechanical equipment, ducts, pipes or other construction appurtenances normally associated with a residential or commercial structure;
- 2) Swing-in garages and circular driveway are encouraged on wide lots to allow vehicles to enter the public way in a forward manner when such drives are landscaped appropriately;
- 3) There shall be a level setback of not less than five (5) feet on that portion of a hillside lot between the wall of any structure on such lot and any adjacent slope of greater than 15% of such lot;
- 4) The proposed development will not result in a substantial change in the physical conditions which exist in the area affected by the proposed project.

91.41.10 LIMITATION ON INCREASES IN HEIGHT.

No enlargement in any building or structure, or any remodeling of any building or structure, shall be permitted which causes the height of such building or structure or any part thereof, to be higher than before the remodeling or enlargement, unless the Planning Commission (or City Council on appeal) shall find that:

- a) It is not feasible to increase the size of or rearrange the space within the existing building or structure for the purposes intended except by increasing the height;
- b) If such lack of feasibility is proved:
 - 1) Denial of such application would result in an unreasonable hardship to the applicant; and
 - 2) Granting the application would not be materially detrimental to the public welfare and to other properties in the vicinity.

91.41.11 LIMITATION ON INCREASES IN BUILDING SPACE LOT COVERAGE.

- a) No remodeling or enlargement shall be made to any building or structure, except for commercial uses in a commercial zone, which remodeling or addition increases the net interior floor area of the building or structure so that it exceeds fifty percent (50%) of the number of square feet in the lot or parcel of land upon which the building or structure is located unless the Planning Commission (or the City Council on

appeal) shall find that:

- 1) Denial of such application would constitute an unreasonable hardship to the applicant; and
 - 2) Granting of such application would not be materially detrimental to the public welfare, and to other property in the vicinity.
- b) For purposes of this section, the term "commercial zone" shall mean any zone in which commercial uses are permitted, or are permitted with a Conditional Use Permit.

91.41.12 WAIVERS.

Waivers may be granted pursuant to the provisions of Chapter 4, Article 2, of this Division; provided, however, that the building height requirements of this Article may be changed only pursuant to a Precise Plan. Where both a Waiver and a Precise Plan are necessary, both may be processed as a single matter.

91.41.13 GUIDELINES FOR REVIEW OF COASTAL DEVELOPMENT.

- a) The following factors, in addition to the California Coastal Act, related State regulations and the other provisions of this Article, shall be considered by the Planning Commission when reviewing any development regardless of zone as to those properties lying westerly of Palos Verdes Boulevard in the Coastal Zone as defined in the California Coastal Act:
- 1) Multiple-family dwellings should not exceed thirty-five (35) feet above existing grade elevation;
 - 2) Roof signs should not be permitted; and
 - 3) Ground signs should be limited to monument-type signs with a maximum height of eight (8) feet above the front property line.
- b) The following factors should be considered during review of any development proposed for the coastal bluffs or adjacent to the sandy beach areas:
- 1) No improvements will be allowed west of the safe building line established by the Department of Building and Safety for Lots 149 through 164, Tract 18379;
 - 2) No construction will be allowed between the safe building line and the west side of Paseo de la Playa, or on any lots north of Lot 148, Tract 18379, without a soils and geologic investigation being filed with the Department of Building and Safety;
 - 3) No development will be allowed without supporting data showing proof of bluff and supporting soils stability being filed with the Department of Building and Safety;
 - 4) Whether the proposed development impairs access to the beach areas for use by the general public;
 - 5) Whether the proposed development is incompatible with recreational usage by the general public; and
 - 6) Whether the proposed development will result in blockage of coastal views from public rights-of-way.

91.41.14 EXEMPTIONS.

- a) Unless in the opinion of the Director of Building and Safety, based upon the criteria of Sections [91.41.6](#), [91.41.9](#), [91.41.10](#), [91.41.11](#) and [91.41.13](#) of this Article, such improvements may have a significant adverse effect on surrounding properties, the following shall be exempt from review under Section [91.41.9](#) of this Code, regardless of the valuation of improvements: retaining walls three (3) feet or less in height, interior modifications, maintenance or replacement of existing improvements, fences six (6) feet or less in height, grade walls, architectural appurtenances and

nonoccupied areas, including but not limited to, uncovered decks, swimming pools, jacuzzis and open patios and those developments exempted by the California Coastal Act where applicable.

b) The Planning Director may exempt the following from review under Section [91.41.5](#) of this Article upon determining that there is no significant public controversy thereon unless in the opinion of the Planning Director or the Director of Building and Safety, based upon the criteria of Sections [91.41.6](#), [91.41.9](#), [91.41.10](#), [91.41.11](#) and [91.41.13](#) of this Article, the improvements may have a significant adverse effect on such surrounding properties, regardless of the value of such improvements: retaining walls over three (3) feet in height, balconies, patios, covered decks or any other occupied areas or solar panels; and those developments exempted by the California Coastal Act where applicable.

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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.

P/I, P-CF Specific Land Use Issues Under the Torrance Hillside Overlay

RECOMMENDATION

The City of Redondo Beach has indicated it seeks to consider the land use and zoning of adjoining cities as it revises its General Plan. In the case of at least one large Public/Institutional (P/I) land use that is currently P-CF zoned parcel, the adjacent Torrance land is residential and in the Torrance Hillside Overlay (THO).

As a result of the THO, significant limitations should be considered for the P/I P-CF parcel, including:

- No adverse impact on view, light, air, or privacy
- Minimize intrusion
- Harmony with THO property
- No negative impact on property values
- No adverse cumulative impact
- Not exceed 14-feet in height
- No adverse impact or significant controversy

These considerations based on the adjoining THO area are recommended to be incorporated into a Redondo Beach overlay that is applied to non-residential Redondo Beach property adjacent to THO areas.

DISCUSSION

The Torrance Hillside Overlay (THO) map clearly shows that the entirety of Flagler from Beryl to Towers, and through Flagler Alley, is governed under the THO.



Development under the THO is constrained by the long-standing Torrance Municipal Code (TMC) section, the full text of which is available at ARTICLE 41 - R-H HILLSIDE AND LOCAL COASTAL OVERLAY ZONE. For

convenience, the THO is reproduced at the end of this document and is thereby entered into the Redondo Beach General Plan, City Council, and Planning Commission records.

The THO has a number of specific requirements that are best extracted verbatim for discussion.
In summary, if the adjacent Redondo Beach P/I Land Use (P-CF zoning) were in Torrance, it would be required by the THO to conform to the following:

- No adverse impact on view, light, air, or privacy
- Minimize intrusion
- Harmony with other property
- No negative impact on property values
- No adverse cumulative impact
- Not exceed 14-feet in height
- No adverse impact or significant controversy

91.41.6 PLANNING AND DESIGN.

(Amended by O-3477)

No construction and no remodeling or enlargement of a building or structure shall be permitted unless the Planning Commission (or the City Council on appeal) shall find that the location and size of the building or structure, or the location and size of the remodeled or enlarged portions of the building or structure, have been planned and designed in such a manner as to comply with the following provisions:

NO ADVERSE IMPACT ON VIEW, LIGHT, AIR OR PRIVACY

a) The proposed development will not have an adverse impact upon the view, light, air and privacy of other properties in the vicinity;

MINIMIZE INTRUSION

b) The development has been located, planned and designed so as to cause the least intrusion on the views, light, air and privacy of other properties in the vicinity;

HARMONY WITH OTHER PROPERTY IN THE VICINITY

c) The design provides an orderly and attractive development in harmony with other properties in the vicinity;

NO HARMFUL IMPACT ON LAND VALUES IN THE VICINITY

d) The design will not have a harmful impact upon the land values and investment of other properties in the vicinity;

NOT DETRIMENTAL TO OTHER PROPERTIES IN THE VICINITY

e) Granting such application would not be materially detrimental to the public welfare and to other properties in the vicinity;

NO ADVERSE CUMULATIVE IMPACT

f) The proposed development will not cause or result in an adverse cumulative impact on other properties in the vicinity.

91.41.8 PERMITTED DEVELOPMENT - COMMERCIAL.

Notwithstanding the provisions of this Article, no Precise Plan shall be required if the proposed development within the Hillside and Coastal Overlay zone is for the purpose of constructing, remodeling or enlarging a commercial building, located in a commercial zone, if the following requirements are met:

- a) In the case of remodeling or enlargement of a building, the net interior area of the resulting building will not be increased by more than fifty percent (50%) as a result of the remodeling or enlargement;*
- b) The commercial building (or in the case of remodeling or enlargement, the portion remodeled or enlarged) will be one (1) story; and provided, further, that in the event the commercially zoned lot adjoins any lot used for residential purposes, no portion of the roof (or in the event of remodeling or enlargement, no portion of the remodeled or enlarged roof) will be used as a deck, sun-deck or patio, nor will any equipment or appurtenances be mounted on the roof, protrude through the roof, or extend above the roof, or extend above the roof eave line (except for ordinary plumbing or heating vents);*

NOT EXCEED 14-FEET IN HEIGHT

- c) No portion of the building, in the case of new construction, will exceed fourteen (14) feet in height, measured from the ground at finished grade, but not including any berm. In the case of remodeling or enlargement, the portion remodeled or enlarged shall not exceed fourteen (14) feet in height, measured from finished grade, but not including any berm, or shall not exceed the height of the lowest portion of the remainder of the building, whichever is less. Ordinary plumbing or heating vents, as provided for in subsection b) of this section shall not be considered in the height measurement.*

NO ADVERSE EFFECT OR CONTROVERSY

- d) The Planning Director has determined that the proposed development will not have an adverse effect on other properties in the vicinity, and there is no significant public controversy thereon.*

ARTICLE 41 - R-H HILLSIDE AND LOCAL COASTAL OVERLAY ZONE

(Added by O-2747; Amended by O-2760; O-2961; O-2982; O-3027; O-3110, O-3126, O-3144)

91.41.1 HILLSIDE AND COASTAL ZONE.

- a) The Hillside and Local Coastal Overlay Zone shall consist of the area designated in the maps attached following this Article, marked Exhibits A, B and C to this section, which are incorporated in this Code by this reference.
- b) The provisions of this Article shall apply to all properties within the Overlay Zone in addition to the requirements of the underlying zone, except as provided in this Article. No permits shall be issued for development in the Hillside and Coastal Zone unless the requirements of this Article have been met.

91.41.2 APPLICATION OF PREEXISTING ZONE.

Nothing contained in this Article shall be deemed to repeal any provision of this Code, and the requirements of all preexisting zones in existence in the area encompassed by this Overlay Zone shall be and remain in full force and effect in addition to the requirements of the Overlay Zone, except that the requirements of the Overlay Zone shall be applied where the requirements and standards contained therein are more restrictive than those of the preexisting underlying zones.

91.41.3 LOT DIMENSIONS.

(Amended by O-3283)

Residential lots within the Overlay Zone shall provide a minimum lot width of fifty (50) feet for interior lots or sixty (60) feet for exterior lots, plus one (1) foot for each one percent (1%) slope in excess of fifteen percent (15%) based on existing grade or finished grade, whichever is more restrictive.

91.41.4 PUBLIC HEARING.

- a) Upon receipt of the complete application, the Planning Director shall set a date, time and place for a public hearing thereon as soon as practicable and shall send notice thereof to the owners of land included within a three hundred (300) foot radius of the exterior boundaries of the land for which the permit is sought as shown on the last equalized assessment roll. The Planning Commission may conduct said hearing in an informal manner. The rules of evidence shall not apply. The hearing may be adjourned to a future time at the discretion of the Planning Commission without the giving of further notice, other than announcement by the Commission of the date, time and place of such adjourned meeting at the time of said adjournment.
- b) The applicant shall have the burden of proving that all the requirements of this Article have been met.
- c) The Planning Commission may consider all measures which are proposed by the project proponents to be included in the project and other measures that are not included but could reasonably be expected to reduce the adverse impacts of the project, if required as conditions.

91.41.5 PRECISE PLAN.

- a) Any development on a lot within the Hillside and Coastal Zone shall be subject to approval by the Planning Commission of a Precise Plan in accordance with Chapter [6](#) of this Division [9](#), except as provided in Sections [91.41.7](#), [91.41.8](#), and [91.41.14](#) of this Article.
- b) Nothing in this chapter shall be construed to permit the restrictions which are less restrictive than established in the this Code, or in the California Coastal Act as to those

properties lying westerly of Palos Verdes Boulevard in the Coastal Zone as defined by the California Coastal Act.

c) Nothing in this Article shall be construed to authorize the Planning Commission to impose conditions more restrictive than the express provisions of this Code or the California Coastal Act as to those properties lying westerly of Palos Verdes Boulevard in the Coastal Zone as defined in the California Coastal Act when so doing would render construction on any lot impossible where such construction would be possible in accordance with the Code as written.

d) The requirements, restrictions and conditions of the California Coastal Act, commencing at Section 30000 of the Public Resources Code of the State of California and any implementing regulations authorized by law, are incorporated by this reference as to the properties lying westerly of Palos Verdes Boulevard in the Coastal Zone as defined in the California Coastal Act.

91.41.6 PLANNING AND DESIGN.

(Amended by O-3477)

No construction and no remodeling or enlargement of a building or structure shall be permitted unless the Planning Commission (or the City Council on appeal) shall find that the location and size of the building or structure, or the location and size of the remodeled or enlarged portions of the building or structure, have been planned and designed in such a manner as to comply with the following provisions:

- a) The proposed development will not have an adverse impact upon the view, light, air and privacy of other properties in the vicinity;
- b) The development has been located, planned and designed so as to cause the least intrusion on the views, light, air and privacy of other properties in the vicinity;
- c) The design provides an orderly and attractive development in harmony with other properties in the vicinity;
- d) The design will not have a harmful impact upon the land values and investment of other properties in the vicinity;
- e) Granting such application would not be materially detrimental to the public welfare and to other properties in the vicinity;
- f) The proposed development will not cause or result in an adverse cumulative impact on other properties in the vicinity.

91.41.7 PERMITTED DEVELOPMENT - RESIDENTIAL.

Notwithstanding the provisions of this Article, no Precise Plan shall be required if the proposed development within the Hillside and Coastal Overlay Zone is for the purpose of constructing, remodeling or enlarging a dwelling, provided the following requirements are met:

- a) The net interior area of the completed dwelling, whether it is new construction or remodeled or enlarged, including the area of the garage, whether attached or detached, will not exceed fifty percent (50%) of the area of the lot or parcel on which the dwelling is located;
- b) The dwelling (or in the case of remodeling or enlargement, the portion remodeled or enlarged) will be one (1) story; and provided further that no portion of the roof of the dwelling (or in the case of remodeling or enlargement, no portion of the remodeled or enlarged roof) will be used as a deck, sun-deck or patio, nor will any equipment or appurtenances be mounted on the roof or protrude through the roof (except for ordinary plumbing or heater vents) nor extend above the roof eave line; provided further that a

chimney will be permitted if the portion extending above the roof eave line is no larger than the minimum dimensions required by the Torrance Building Code.

c) Except as provided in this subsection, no portion of the dwelling, in the case of new construction, will exceed fourteen (14) feet in height, measured from the ground at finished grade, but not including any berm. In the case of remodeling or enlargement, the portion remodeled or enlarged shall not exceed the height of the lowest portion of the remainder of the dwelling, or fourteen (14) feet measured from the ground at finished grade, but not including any berm, whichever is less. In the case of a down-sloping lot, no portion of the dwelling shall exceed fourteen (14) feet in height, measured from the top of the curb at the center point of the front property line. Vents and a chimney, as provided in subsection b) of this section, shall not be considered in the height measurements.

d) The Planning Director has determined that the proposed development will not have an adverse effect on other properties in the vicinity, and there is no significant public controversy thereon.

91.41.8 PERMITTED DEVELOPMENT - COMMERCIAL.

Notwithstanding the provisions of this Article, no Precise Plan shall be required if the proposed development within the Hillside and Coastal Overlay zone is for the purpose of constructing, remodeling or enlarging a commercial building, located in a commercial zone, if the following requirements are met:

a) In the case of remodeling or enlargement of a building, the net interior area of the resulting building will not be increased by more than fifty percent (50%) as a result of the remodeling or enlargement;

b) The commercial building (or in the case of remodeling or enlargement, the portion remodeled or enlarged) will be one (1) story; and provided, further, that in the event the commercially zoned lot adjoins any lot used for residential purposes, no portion of the roof (or in the event of remodeling or enlargement, no portion of the remodeled or enlarged roof) will be used as a deck, sun-deck or patio, nor will any equipment or appurtenances be mounted on the roof, protrude through the roof, or extend above the roof, or extend above the roof eave line (except for ordinary plumbing or heating vents);

c) No portion of the building, in the case of new construction, will exceed fourteen (14) feet in height, measured from the ground at finished grade, but not including any berm. In the case of remodeling or enlargement, the portion remodeled or enlarged shall not exceed fourteen (14) feet in height, measured from finished grade, but not including any berm, or shall not exceed the height of the lowest portion of the remainder of the building, whichever is less. Ordinary plumbing or heating vents, as provided for in subsection b) of this section shall not be considered in the height measurement;

d) The Planning Director has determined that the proposed development will not have an adverse effect on other properties in the vicinity, and there is no significant public controversy thereon.

91.41.9 DEVELOPMENT STANDARDS.

a) For slope control:

1) All structures shall have roof drainage directed to the street or other approved drainageways by approved methods;

- 2) All excavations, paving, hillside and slope earthwork construction, landscaping and grading, including fills and embankments, shall meet building and grading Code requirements;
- b) For safety, general welfare, aesthetic control, and to help stabilize land values and investments;
 - 1) Stilt-type structures shall be constructed in such a way that there is no exposure to public view of plumbing, electrical, mechanical equipment, ducts, pipes or other construction appurtenances normally associated with a residential or commercial structure;
 - 2) Swing-in garages and circular driveway are encouraged on wide lots to allow vehicles to enter the public way in a forward manner when such drives are landscaped appropriately;
 - 3) There shall be a level setback of not less than five (5) feet on that portion of a hillside lot between the wall of any structure on such lot and any adjacent slope of greater than 15% of such lot;
 - 4) The proposed development will not result in a substantial change in the physical conditions which exist in the area affected by the proposed project.

91.41.10 LIMITATION ON INCREASES IN HEIGHT.

No enlargement in any building or structure, or any remodeling of any building or structure, shall be permitted which causes the height of such building or structure or any part thereof, to be higher than before the remodeling or enlargement, unless the Planning Commission (or City Council on appeal) shall find that:

- a) It is not feasible to increase the size of or rearrange the space within the existing building or structure for the purposes intended except by increasing the height;
- b) If such lack of feasibility is proved:
 - 1) Denial of such application would result in an unreasonable hardship to the applicant; and
 - 2) Granting the application would not be materially detrimental to the public welfare and to other properties in the vicinity.

91.41.11 LIMITATION ON INCREASES IN BUILDING SPACE LOT COVERAGE.

a) No remodeling or enlargement shall be made to any building or structure, except for commercial uses in a commercial zone, which remodeling or addition increases the net interior floor area of the building or structure so that it exceeds fifty percent (50%) of the number of square feet in the lot or parcel of land upon which the building or structure is located unless the Planning Commission (or the City Council on appeal) shall find that:

- 1) Denial of such application would constitute an unreasonable hardship to the applicant; and
 - 2) Granting of such application would not be materially detrimental to the public welfare, and to other property in the vicinity.
- b) For purposes of this section, the term "commercial zone" shall mean any zone in which commercial uses are permitted, or are permitted with a Conditional Use Permit.

91.41.12 WAIVERS.

Waivers may be granted pursuant to the provisions of Chapter 4, Article 2, of this Division; provided, however, that the building height requirements of this Article may be

changed only pursuant to a Precise Plan. Where both a Waiver and a Precise Plan are necessary, both may be processed as a single matter.

91.41.13 GUIDELINES FOR REVIEW OF COASTAL DEVELOPMENT.

a) The following factors, in addition to the California Coastal Act, related State regulations and the other provisions of this Article, shall be considered by the Planning Commission when reviewing any development regardless of zone as to those properties lying westerly of Palos Verdes Boulevard in the Coastal Zone as defined in the California Coastal Act:

- 1) Multiple-family dwellings should not exceed thirty-five (35) feet above existing grade elevation;
- 2) Roof signs should not be permitted; and
- 3) Ground signs should be limited to monument-type signs with a maximum height of eight (8) feet above the front property line.

b) The following factors should be considered during review of any development proposed for the coastal bluffs or adjacent to the sandy beach areas:

- 1) No improvements will be allowed west of the safe building line established by the Department of Building and Safety for Lots 149 through 164, Tract 18379;
- 2) No construction will be allowed between the safe building line and the west side of Paseo de la Playa, or on any lots north of Lot 148, Tract 18379, without a soils and geologic investigation being filed with the Department of Building and Safety;
- 3) No development will be allowed without supporting data showing proof of bluff and supporting soils stability being filed with the Department of Building and Safety;
- 4) Whether the proposed development impairs access to the beach areas for use by the general public;
- 5) Whether the proposed development is incompatible with recreational usage by the general public; and
- 6) Whether the proposed development will result in blockage of coastal views from public rights-of-way.

91.41.14 EXEMPTIONS.

a) Unless in the opinion of the Director of Building and Safety, based upon the criteria of Sections [91.41.6](#), [91.41.9](#), [91.41.10](#), [91.41.11](#) and [91.41.13](#) of this Article, such improvements may have a significant adverse effect on surrounding properties, the following shall be exempt from review under Section [91.41.9](#) of this Code, regardless of the valuation of improvements: retaining walls three (3) feet or less in height, interior modifications, maintenance or replacement of existing improvements, fences six (6) feet or less in height, grade walls, architectural appurtenances and nonoccupied areas, including but not limited to, uncovered decks, swimming pools, jacuzzis and open patios and those developments exempted by the California Coastal Act where applicable.

b) The Planning Director may exempt the following from review under Section [91.41.5](#) of this Article upon determining that there is no significant public controversy thereon unless in the opinion of the Planning Director or the Director of Building and Safety, based upon the criteria of Sections [91.41.6](#), [91.41.9](#), [91.41.10](#), [91.41.11](#) and [91.41.13](#) of this Article, the improvements may have a significant adverse effect on such surrounding properties,

regardless of the value of such improvements: retaining walls over three (3) feet in height, balconies, patios, covered decks or any other occupied areas or solar panels; and those developments exempted by the California Coastal Act where applicable.