

From: Yahoo tiburon4w  
Sent: Monday, May 23, 2022 7:33 PM  
To: CityClerk <[CityClerk@redondo.org](mailto:CityClerk@redondo.org)>  
Subject: BCHD building plans

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I am concerned about Beach Cities Health District's proposed Phase 1 development plan that will be commercially DEVELOPED/OWNED/OPERATED. Phase 1 is proposed to be 110-feet above the surrounding streets and 300,000 sqft in size. Phase 2 will bring the total BCHD site up to nearly 800,000 sqft, which is 250% its current size. That is larger than the entire adjacent Beryl Heights neighborhood's homes' sizes all added together. BCHDs proposed plan is also 3-times the height and 150% as large as the voter-rejected CenterCal Mall-by-the-Sea.

I am also concerned that BCHD continues to spend from a \$16M taxpayer fund, preparing inconsistent, incompatible, and irresponsible plans on an elevated site in the center of residential, 30-foot or lower maximum height neighborhoods.

BCHDs 2017 design committed to protecting neighborhoods with buildings in the center and surface parking around the edges buffering homes from damages.

BCHDs 2019 design (June EIR) was 60-feet tall and ringed the site on the edge. The 2020 design (June Board) was 76-feet tall and also on the edge. The 2021 design (March EIR) was 103-feet tall and also on the edge. The current design is claimed to be 83-feet tall and also on the edge of the site and still meets NONE of the comments regarding excessive height and size from 100s of surrounding neighbors and 1000s of petitioners against the project.

The attachment specifically calls out BCHDs plan's noncompliance with specific sections of RBMC CUP and PCDR and on TMC Hillside Overlay.

I ask that the Mayors, Councils and Planning Commissioners provide guidance to their respective Staff and lawyers to convey the public's disapproval of the current plan that BCHD is pouring our tax funding into. Thank you.

W. Glasgow

**From:** Stop BCHD

**Sent:** Wednesday, May 25, 2022 5:01 PM

**To:** Communications <[communications@bchd.org](mailto:communications@bchd.org)>; CityClerk <[CityClerk@redondo.org](mailto:CityClerk@redondo.org)>; [cityclerk@torranceca.gov](mailto:cityclerk@torranceca.gov); [cityclerk@hermosabeach.gov](mailto:cityclerk@hermosabeach.gov); [cityclerk@manhattanbeach.gov](mailto:cityclerk@manhattanbeach.gov); [Al.Muratsuchi@asm.ca.gov](mailto:Al.Muratsuchi@asm.ca.gov); [Ben.Allen@sen.ca.gov](mailto:Ben.Allen@sen.ca.gov); [HollyJMitchell@bos.lacounty.gov](mailto:HollyJMitchell@bos.lacounty.gov); Noel Chun <[noel.chun@bchd.org](mailto:noel.chun@bchd.org)>; Vanessa I. Poster <[vanessa.poster@bchd.org](mailto:vanessa.poster@bchd.org)>; Michelle Bholat <[michelle.bholat@bchd.org](mailto:michelle.bholat@bchd.org)>; Jane Diehl <[jane.diehl@bchd.org](mailto:jane.diehl@bchd.org)>; [martha.koo@bchd.org](mailto:martha.koo@bchd.org); Bill Brand <[Bill.Brand@redondo.org](mailto:Bill.Brand@redondo.org)>; [pfurey@torranceca.gov](mailto:pfurey@torranceca.gov); [citycouncil@hermosabeach.gov](mailto:citycouncil@hermosabeach.gov)

**Cc:** Kevin Cody <[kevin@easyreadernews.com](mailto:kevin@easyreadernews.com)>; [pnovak@lalafo.org](mailto:pnovak@lalafo.org); Lisa Jacobs <[lisa.jacobs@tbrnews.com](mailto:lisa.jacobs@tbrnews.com)>

**Subject:** PUBLIC COMMENT - BCHD "Wealthy" Living Campus Project

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To: Mayors, Councils and Planning Commissions of Torrance, Redondo, Manhattan and Hermosa Beach Regional Electeds

LALAFCO

Media

The letter below demonstrates using BCHD document references that BCHD has ignored both its 2017 commitments to stop damaging surrounding neighborhoods and comments over well over 1000 residents and surrounding neighbors to reduce the size of the BCHD compound plan.

As shown, in 2017 BCHD acknowledged its damages to the surrounding neighborhoods and committed to surface parking and green buffer space. BCHD then proposed not one, but three further designs all built on the perimeter of a 30-foot+ elevated site.

Further, BCHD increased the height of its proposal in the face of public objection from 60 to 76 to 103 feet tall from 2019 to 2021. Clearly, BCHD ignored public comment.

Last, BCHD removed 160,000 sqft of underground parking that would be out of site and not a privacy and noise hazard to the community, and replaced it with an 8-10 story parking ramp (about 300,000 sqft).

In short, BCHD made its commercial development CLOSER, TALLER and BIGGER to the surrounding neighborhoods, yet continues a false narrative that it responded to neighborhood concerns. BCHD not only IGNORED the neighborhoods, it increased the local damage level to property values, privacy, noise, and other made the commercial compound less compatible and more character damaging.

The BCHD proposal as it stands is unacceptable to the surrounding residents. It fails to protect community rights under the Redondo Beach Conditional Use Permit, Planning Commission Design Review and Residential Design Guidelines.

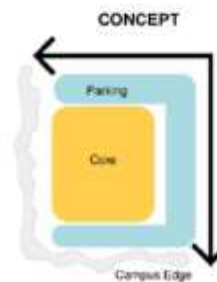
## DOCUMENTED HISTORY OF BCHD IGNORING AND MISTREATING THE SURROUNDING NEIGHBORHOODS, PROPERTIES, AND USES

Beginning with the May 2017 BCHD Community Working Group (CWG) meeting, and continuing on to the June 2019 EIR NOP, the June 2020 Board project approval meeting and the March 2021 Draft EIR, BCHDs proposed campus plan increasingly degraded the surrounding neighborhoods. BCHD ignored input from the local neighborhood representatives on the Community Working Group and written comments from over 1,200 residents and neighbors as BCHD moved the campus plan TO THE PERIMETER and increased HEIGHT and SURFACE AREA OF BUILDINGS.

In short, BCHDs Public Relations campaign regarding treatment of the surrounding neighborhoods is objectively and demonstrably FALSE.

### MAY 15, 2017 – DEEP PERIMETER BUFFERING Healthy Living Campus Parking Approach

On Page 25/29 of the May 2017 CWG presentation clearly shows how BCHD committed to not damaging the surrounding neighborhoods by placing surface parking and green space around the perimeter of the site as a buffer.



### JUNE 27, 2019 – NO PERIMETER BUFFERING, 60-FT MAXIMUM HEIGHT

On Page 13/68 of the June 2019 BCHD EIR NOP shows a MAXIMUM height of 3-4 stories and 60-feet. Unfortunately, BCHD completely reneged on its commitment to a buffer zone, and proposed what came to be known as the “Great Wall of Redondo” all along the perimeter of the site.

#### BCHD Healthy Living Campus Master Plan 3-4 stories (60-foot maximum height)



**JUNE 27, 2020 – NO PERIMETER BUFFERING, 76-FT MAXIMUM HEIGHT, INCREASED SQ-FT OF SURFACE BUILDINGS**

On Page 34/39 of the June 15, 2020 CWG Presentation, BCHD clearly shows an INCREASE of HEIGHT from 60-feet to 76-feet tall for the proposed project IN DIRECT OPPOSITION TO COMMUNITY COMMENTS. Further, BCHD removed 160,000 sq-ft of underground parking, and replaced it with a surface ramp near Prospect and Diamond that will tower over neighbors to from the east to the southwest with 24/7/365 noise, light, traffic and toxic emissions. Overall, the height increased from 60 to 75 ft and the above ground surface buildings increased by 124,200 sqft.

INCREMENTAL BCHD CHANGE FROM 2019 to 2020									
2019				2020		CHANGE			
Pg 23/39	RCFE		423000	SQFT	253700	SQFT	-169300	ABOVE GROUND	
	UNDERGROUND PARKING		160000	SQFT	0	SQFT		UNDERGROUND	
Pg 26/39	PARKING RAMP		0	SQFT	293500	SQFT	293500	ABOVE GROUND	
					NET CHANGE		124,200	SOFT	
					ABOVE GROUND SURFACE BUILDINGS				

**MARCH 2021 – NO PERIMETER BUFFERING, 103-FT MAXIMUM HEIGHT, MAINTAINS INCREASED SQ-FT OF SURFACE BUILDINGS**

On Page 145/972 of the March 2021 BCHD Draft EIR, BCHD clearly shows an ADDITIONAL INCREASE of HEIGHT from 76-feet to 103-feet tall ("RCFE Building would reach a maximum height of 103 feet (including the rooftop cooling tower) above the campus ground level and 133.5 feet above the vacant Flagler Lot below") BCHD acknowledges because of the elevation of the height and its failure to "respect" the site terrain, it would be 133-1/2 feet above the surrounding neighbors on Beryl. It would be TALLER YET above Torrance.

## CONCLUSION

Notwithstanding the comments of well over 1,000 local neighbors and residents, as well as the local neighborhood members of the Community Working Group, indicating that the project was too big and too tall, BCHD continued to:

- INCREASE THE HEIGHT from 60-feet to 103-feet
- BUILD ON THE PERIMETER of the elevated lot and ignore its buffer commitment
- INCREASE THE SQUARE FEET of tall surface buildings that damage character

Any claim by BCHD that it cooperated or responded to comments of the surrounding neighborhoods is demonstrably false as shown.

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STOP BCHD ([StopBCHD@gmail.com](mailto:StopBCHD@gmail.com)) is a neighborhood community of residents concerned about the economic and quality-of-life damages that BCHDs 110-foot above the street, 800,000 sqft commercial development will inflict on our families for the next 50-100 years. Our neighborhoods have been burdened since 1960 and the damages outweigh any benefits.

**From:** Mark Nelson (Home Gmail)

**Sent:** Thursday, May 26, 2022 12:42 AM

**To:** CityClerk <[CityClerk@redondo.org](mailto:CityClerk@redondo.org)>; CityClerk <[CityClerk@torranceca.gov](mailto:CityClerk@torranceca.gov)>

**Subject:** Public Comment - Planning Commission - BCHD Development

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For distribution to the Planning Commissioners

BCHD is now the lessor of land, not the developer/owner/operator as falsely stated.

In the BCHD certified FEIR, BCHD erroneously states the following: (page 9-113)

Although the Project site is located in the City of Redondo Beach, the proposed Healthy Living Campus Master Plan would be approved and implemented, hence, carried out, by BCHD. For example, BCHD would enter into agreements to demolish the existing buildings, construct the new buildings and associated improvements, and operate the new health and fitness facilities. The only

BCHD is in fact NOT going to demolish nor construct nor operate the new buildings and associated developments. According to BCHD, it is actively looking for a developer/owner/operator for those functions. The D/O/O would merely lease the land from BCHD and BCHD will have no ownership share.

The Cities of Redondo Beach and Torrance can no longer rely on the certified EIR due to BCHD either falsification at the time of the FEIR or changed condition.



stopbchd 🏰 48 minutes ago 1 min read

# BCHD Plan Fails RB MC 10-2.2502 Planning Commission Design Review Sect b(2)

BCHD fails to respect the natural terrain of its elevated site, especially due to the declining elevation surrounding the site.

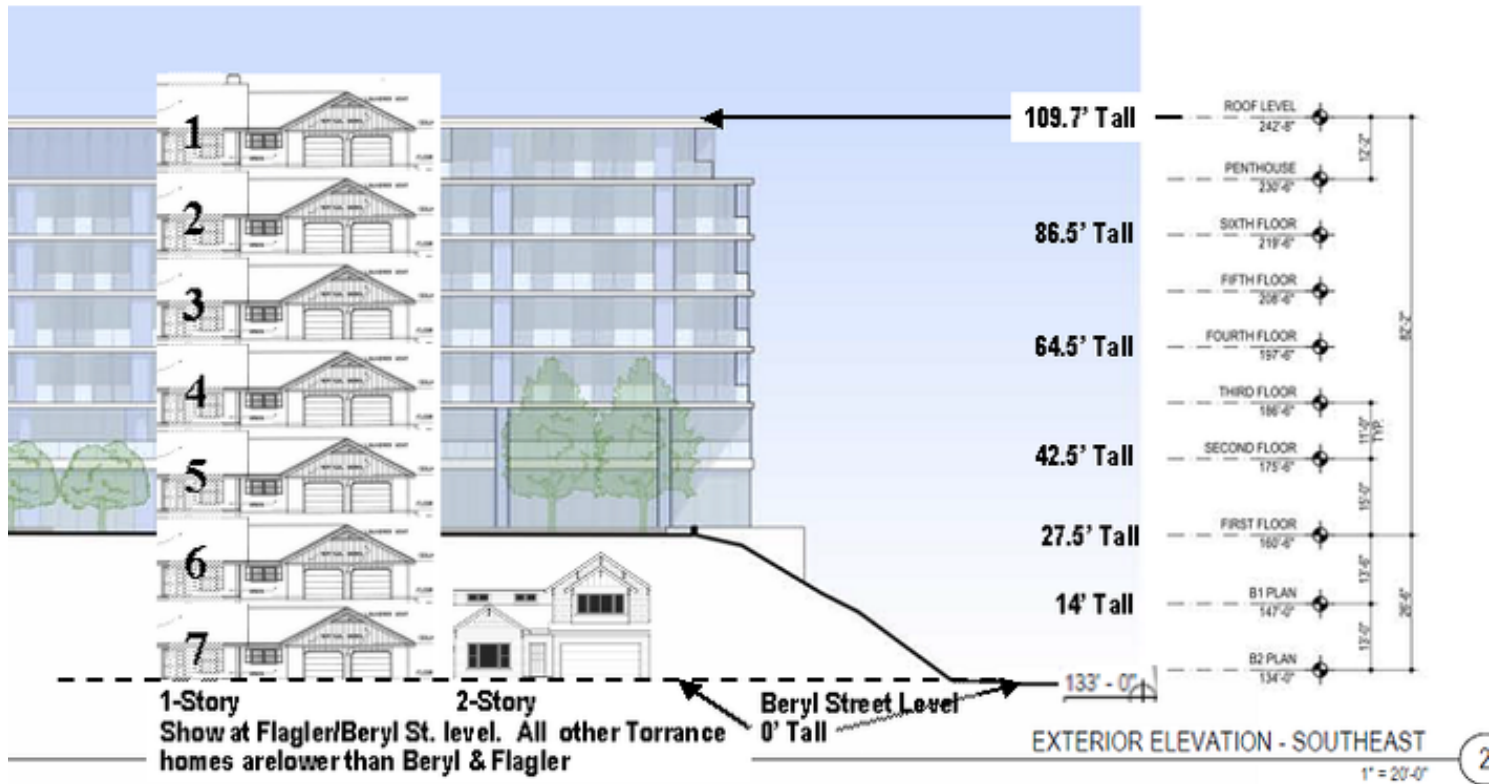
- BCHD proposes nearly 110-feet above the closest streets (Beryl & Flagler)
- BCHD proposes to build on the site perimeter, instead of in the center as the District has done previously
- BCHD proposes outward facing opening doors and balconies that will diminish privacy and increase noise levels to existing residential uses

## Mandatory Changes to the BCHD Plan

The City of Redondo Beach must enforce this provision of the RBMC to protect the surrounding residents. As demonstrated, BCHD has clearly NOT respected the natural terrain of the Public site. The BCHD facility must be lower, must be further away from the site perimeter, and must not use opening doors and windows in order to isolate the noise travel.

# BCHD Has IGNORED the Natural Terrain - Elevated 110-ft above Beryl and Flagler and 150-ft above Redbeam in Torrance

**BCHD fails to respect the elevated terrain of its site, the declining terrain surrounding its site, and the privacy of surrounding uses**



The City PROTECTED Residents With Restrictions on the Assisted Living on P-CF Public Owned and Zoned Land

**The City of Redondo Beach  
Protected the Residents at  
Knob Hill & PCH from  
Excessive Development In  
a VERY SIMILAR  
SITUATION.**

**The Kensington Redondo Beach  
Same P-CF Zoning, Surrounded by Residential and Light Commercial**



BCHD's proposal is taller than 99.7% of the existing campus buildings and 300-times more sqft OVER 52-feet than the existing campus buildings. As you can see from the evidence below - the proposed building does not respect the elevated campus in location, size or height.

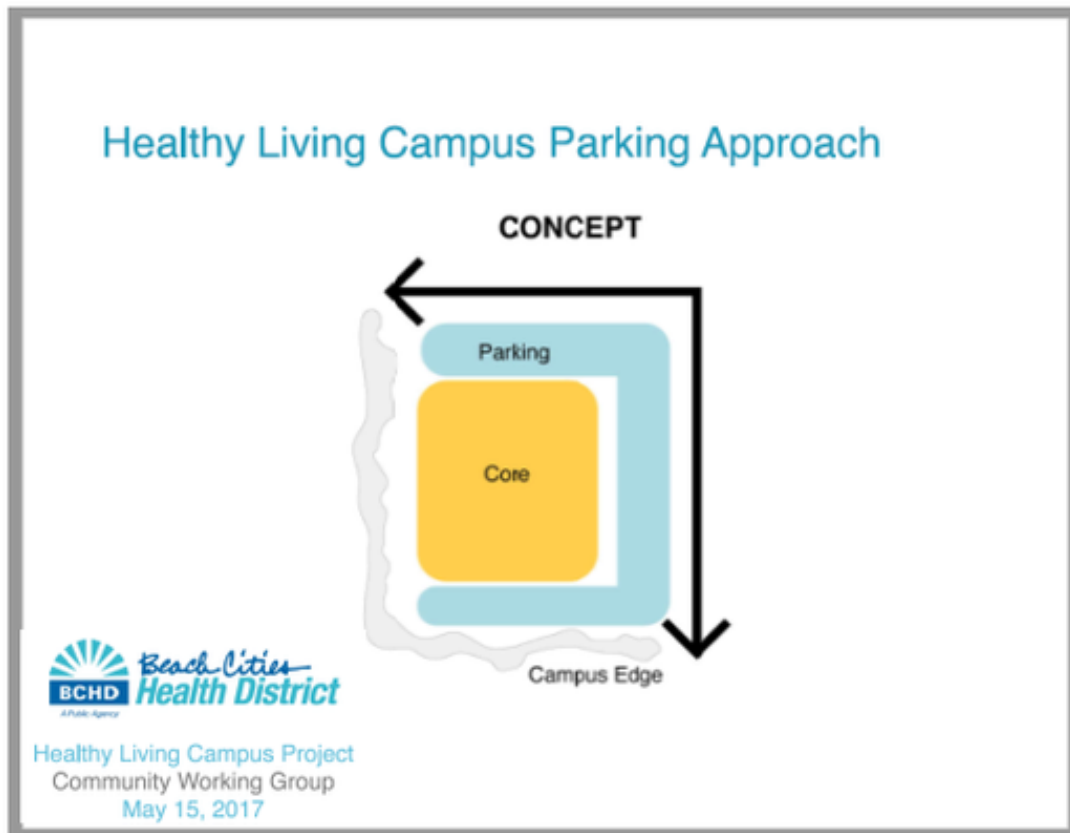


**BCHD claims this GIANT building is "Compatible" in Mass  
and Scale with the Surrounding Neighborhoods and Existing  
Buildings**

## BCHD Recognized the Additional 50-100 Years of Damage That Will Be Inflicted on Surrounding Neighborhoods by the Healthy Living Campus

As a result, BCHD proposed to buffer the neighborhoods by placing the development in the center of the 10 acre parcel and surrounding it with surface parking and landscape as a buffer.

**BCHD then proceeded to ignore its responsibility to the surrounding neighborhoods.**





stopbchd 🏰 48 minutes ago 1 min read

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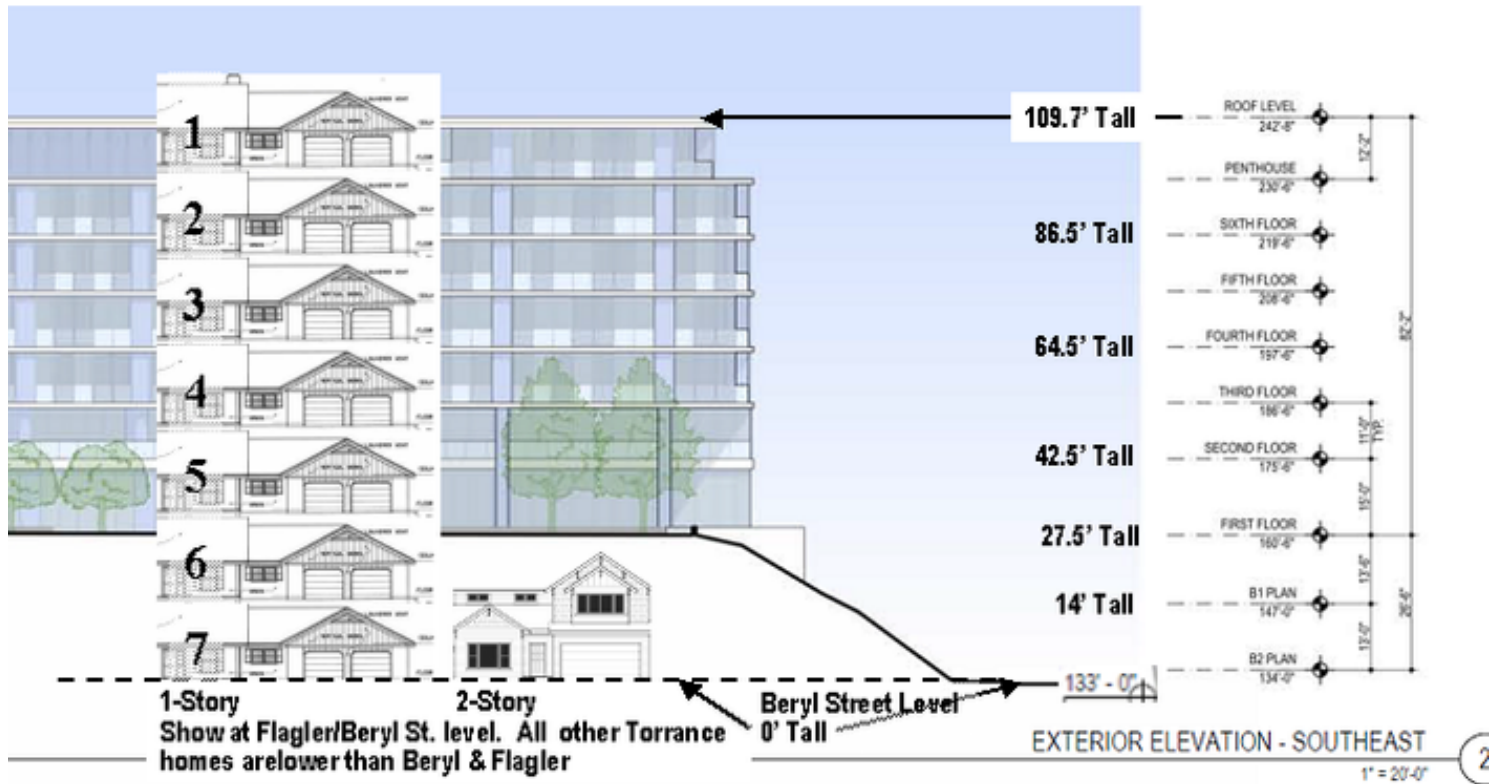
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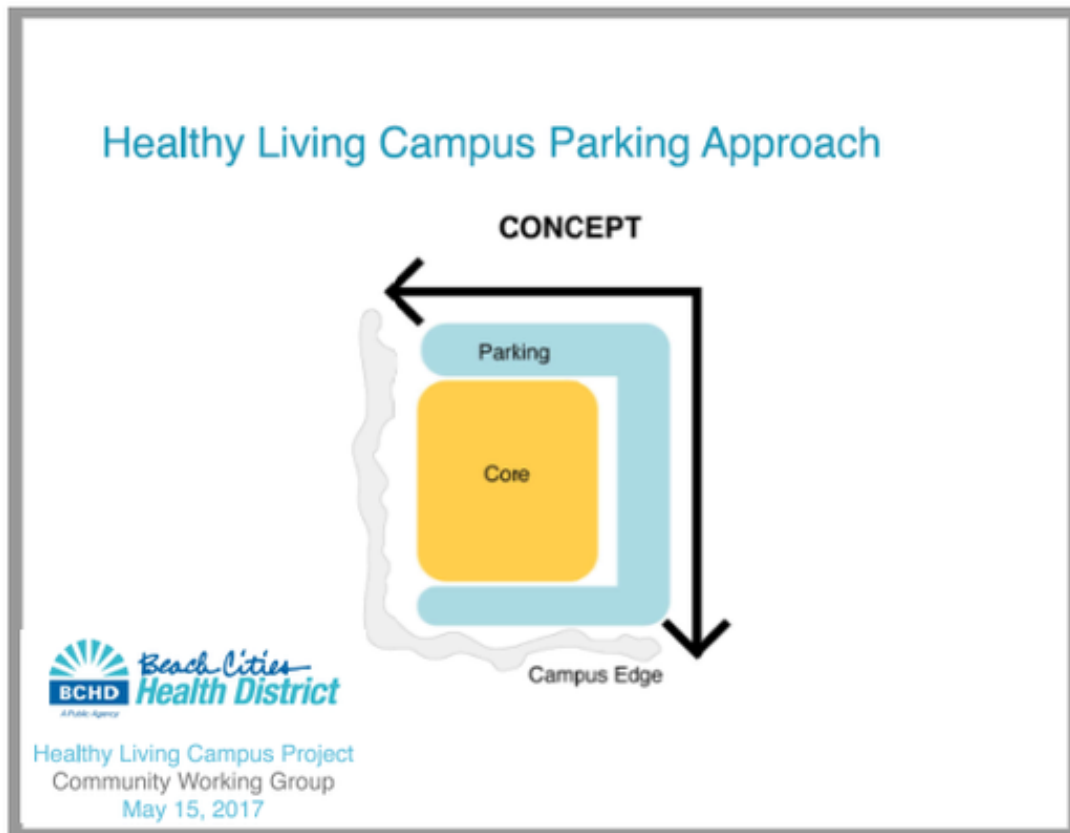


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**BCHD then proceeded to ignore its responsibility to the surrounding neighborhoods.**



**From:** Stop BCHD <stop.bchd@gmail.com>  
**Sent:** Tuesday, May 31, 2022 1:38 PM  
**To:** CityClerk <CityClerk@redondo.org>; cityclerk@torranceca.gov  
**Subject:** Public Comment - Planning Commissioners

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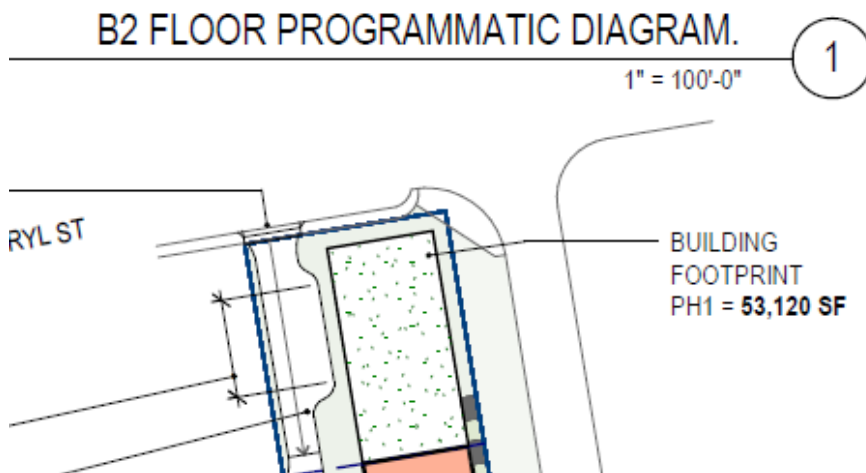
Please distribute under the Brown Act as non-agenda comments from the public to the Planning Commissioners. Thank you.

Note:

There is an apparent error or excessive violation of RBMC for C-2 FAR contained in BCHDs current, public plans.

BCHD states that the C-2 lot in its project will have a 53,120 sqft building footprint on the C-2 lot. See snippet of BCHD Design 11/35 submitted in the Pre-CUP below.

The C-2 lot is 18730.8 sqft per BCHD statement of 0.43 acres. As such, the FAR of 0.5 analyzed in the certified EIR would only allow a 9375 sqft covered structure in total. The BCHD documents are either in error or in violation.



STOP BCHD ([StopBCHD@gmail.com](mailto:StopBCHD@gmail.com)) is a neighborhood community of residents concerned about the economic and quality-of-life damages that BCHDs 110-foot above the street, 800,000 sqft commercial development will inflict on our families for the next 50-100 years. Our neighborhoods have been burdened since 1960 and the damages outweigh any benefits.

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**From:** Stop BCHD <stop.bchd@gmail.com>  
**Sent:** Tuesday, May 31, 2022 2:09 PM  
**To:** CityClerk <CityClerk@redondo.org>; cityclerk@torranceca.gov  
**Subject:** Brown Act Non-Agenda Public Comment to Planning Commissioners

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#### Errors and Omissions in BCHD Pre-CUP Filing

BCHD's Pre-CUP filing at Redondo Beach ignored FAR issues entirely. Where BCHD attempted to provide data, the data was nonsensical or willful violation of RBMC. Failure to disclose FAR has denied the public its right to understand the excessive size of the project.

Below are estimated FAR computations using BCHD provided (Murdoch Arch) data. BCHD is currently a FAR of 72%. After Phase 1, the FAR including the 3rd party owned RCFE will be 116%. Following Phase 2, the FAR will be 183%. These are all excessive and BCHD has hidden them from the public. Further, there appears to be no consideration of FAR increases for the 510 and 520 Medical Buildings in the formal City of Redondo Beach records of approval.

## BCHD FAR COMPUTATIONS

	Buildings	Lot	FAR	Sources
Current	312000	432986	72.1%	312000=2019 EIR NOP, 432986=2022 BCHD Campus Drawing Set
Phase 1	500020	432986	115.5%	500020=Murdoch Arch Firm
Phase 2	792520	432986	183.0%	792520=Murdoch Arch Firm

Current BCHD Campus - 312,900 sf

2020 Above Ground - 792,520 sf +250%

### ARCHITECT'S NUMBERS (square footage)

	2019 Master Plan	2020 Master Plan		
Residential Care for the Elderly (Assisted Living + Memory Care)	423,000	253,700	-170K	
Programs of All-Inclusive Care for the Elderly (PACE)	0	14,000	+14K	
Community Services	6,270	6,270		
Pavilion/Center for Health & Fitness/Aquatics	74,000	90,250	+16K	
Child Development Center	10,000	0	-10K	
Service/Back of House	31,730	9,100	-22K	
New Parking Structure	270,000	292,500	+160K above ground	500020 P
Parking Structure Area to Remain	27,000	27,000		Phase 2 size
510 N. Prospect MOB	0	52,000	+52K	
520 N. Prospect MOB	47,700	47,700		
TOTAL	889,700	792,520		
Difference		-97,180	+60K above ground	
Net Change		-10.92%	25% taller (75-ft)	792520 P

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**From:** Stop BCHD <[stop.bchd@gmail.com](mailto:stop.bchd@gmail.com)>

**Sent:** Monday, June 6, 2022 5:13 PM

**To:** CityClerk <[CityClerk@redondo.org](mailto:CityClerk@redondo.org)>

**Subject:** Planning Commission Public Non-Agenda Item Comments - BCHD Development Plan Non-Compliance with RBMC

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Redondo Beach Planning Commissioners:  
(by bcc as provided by the City of Redondo Beach)

Attached are several files (and their links) framing issues of the defects of the proposed BCHD project as identified at StopBCHD.com. As examples of the BCHD failures to comply with the RBMC on Planning Commission Design Review, the following are attached as PDFs to be entered into the record.

**BCHD Plan Fails RBMC 10-2.2502 Planning Commission Design Review Sect (a) "Purpose"**

<https://www.stopbchd.com/post/bchd-plan-fails-rbmc-10-2-2502-planning-commission-design-review-sect-a-purpose> **BCHD Plan Fails RBMC 10-2.2502 Planning Commission Design Review Sect b(1)**

**"Privacy"** <https://www.stopbchd.com/post/bchd-plan-fails-rbmc-10-2-2502-planning-commission-design-review-sect-b-1-privacy> **BCHD Plan Fails RBMC 10-2.2502 Planning Commission Design Review**

**Sect b(1) "Utilities"** <https://www.stopbchd.com/post/bchd-plan-fails-rbmc-10-2-2502-planning-commission-design-review-sect-b-1-utilities> **BCHD Plan Fails RBMC 10-2.2502 Planning Commission**

**Design Review Sect b(2) "Respect Natural Terrain"** <https://www.stopbchd.com/post/bchd-plan-fails-rbmc-10-2-2502-planning-commission-design-review-sect-b-2> **BCHD Plan Fails RBMC 10-2.2502 Planning**

**Commission Design Review Sect b(4) "Balance and Integration"**

<https://www.stopbchd.com/post/bchd-plan-fails-rbmc-10-2-2502-planning-commission-design-review-sect-b-4-balance-and-integration>

We are concerned that the City did not appear to provide adequate feedback to BCHD in its comments to the Pre-CUP filing. These violations of RBMC were apparent in that February 2022 BCHD filing.

We encourage the Commissioners to counsel BCHD to modify its plan to something that does not violate RBMC on its face. Thank you.

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STOP BCHD ([StopBCHD@gmail.com](mailto:StopBCHD@gmail.com)) is a neighborhood community of residents concerned about the economic and quality-of-life damages that BCHDs 110-foot above the street, 800,000 sqft commercial development will inflict on our families for the next 50-100 years. Our neighborhoods have been burdened since 1960 and the damages outweigh any benefits.



stopbchd 🏰 51 minutes ago 1 min read

# BCHD Plan Fails RBMC 10-2.2502 Planning Commission Design Review Sect (a) "Purpose"

From the RBMC, "Planning Commission Design Review [PCDR] is established to ensure compatibility ... [and] ... serve to protect property values."

Real estate modeling shows that property with the same characteristics is worth less, the closer it is to BCHD. That's with BCHD being 99% 52-feet tall or less and 300,000 sqft in size. BCHD wants to expand to 110-feet above Beryl St and expand the buildings to 792,000 sqft. How much more will that drive down property values?

THAT WORK IS UNDERWAY - BUT IN THE MEANTIME, THE STATISTICS ARE CLEAR - SURROUNDING HOME VALUES WERE NOT PROTECTED

BCHD is Proposing to Roughly DOUBLE the Average Building Height and Nearly TRIPLE the Size (SQFT) of Campus Buildings

## How Much More Property Value Should We Lose?

Valuation Model shows the Closer your Property is to BCHD, the Lower your Value is compared to Similar Property farther Away

**TODAY – Existing BCHD Site Buildings**  
SIZE: 312,000 SQFT, HEIGHT: 99% is 52-feet or shorter

**Proposed BCHD Project Site Buildings**  
SIZE: 792,000 SQFT, HEIGHT: up to 109 feet

BCHD wants to more than **DOUBLE** the **Height and Size** of Commercial Buildings in the Middle of Residential Neighborhoods

Distance from BCHD	Average Value Reduction
0-1000 ft	\$142,200
1-2000 ft	\$73,300
2-3000 ft	\$24,800



## How Much MORE Will Doubling the Size Cost US?

### Speak Now or Forever LOSE Your PEACE

- ✓How does 5 years of demolition, construction and heavy truck traffic at Beach Cities Health District sound? **LOUD!**
- ✓How about an 8-10 story 24/7/365 parking ramp at Prospect & Diamond? **LOUD!**

### The Window to ACT is CLOSING

- ✓Go to StopBCHD.com where you will find letters you can send to the Planning Commission & City Council to voice YOUR concerns
- ✓Visit TRAONews.org where you will find more information about the project
- ✓GET INFORMED – GET ACTIVE

Get on the ACTION LIST – email [StopBCHD@gmail.com](mailto:StopBCHD@gmail.com)

# StopBCHD.com



stopbchd 🏰 19 hours ago 2 min read

# **BCHD Plan Fails RBMC 10-2.2502 Planning Commission Design Review Sect b(1) "Utilities"**

BCHD proposes to relocate its 16,000V transformer(s), 2,000kW polluting diesel generator(s), and likely 2,500 gallon or larger explosive fuel storage tanks to the south perimeter of the site, adjacent to Diamond St. The facility will also be less than 100-feet from residences.

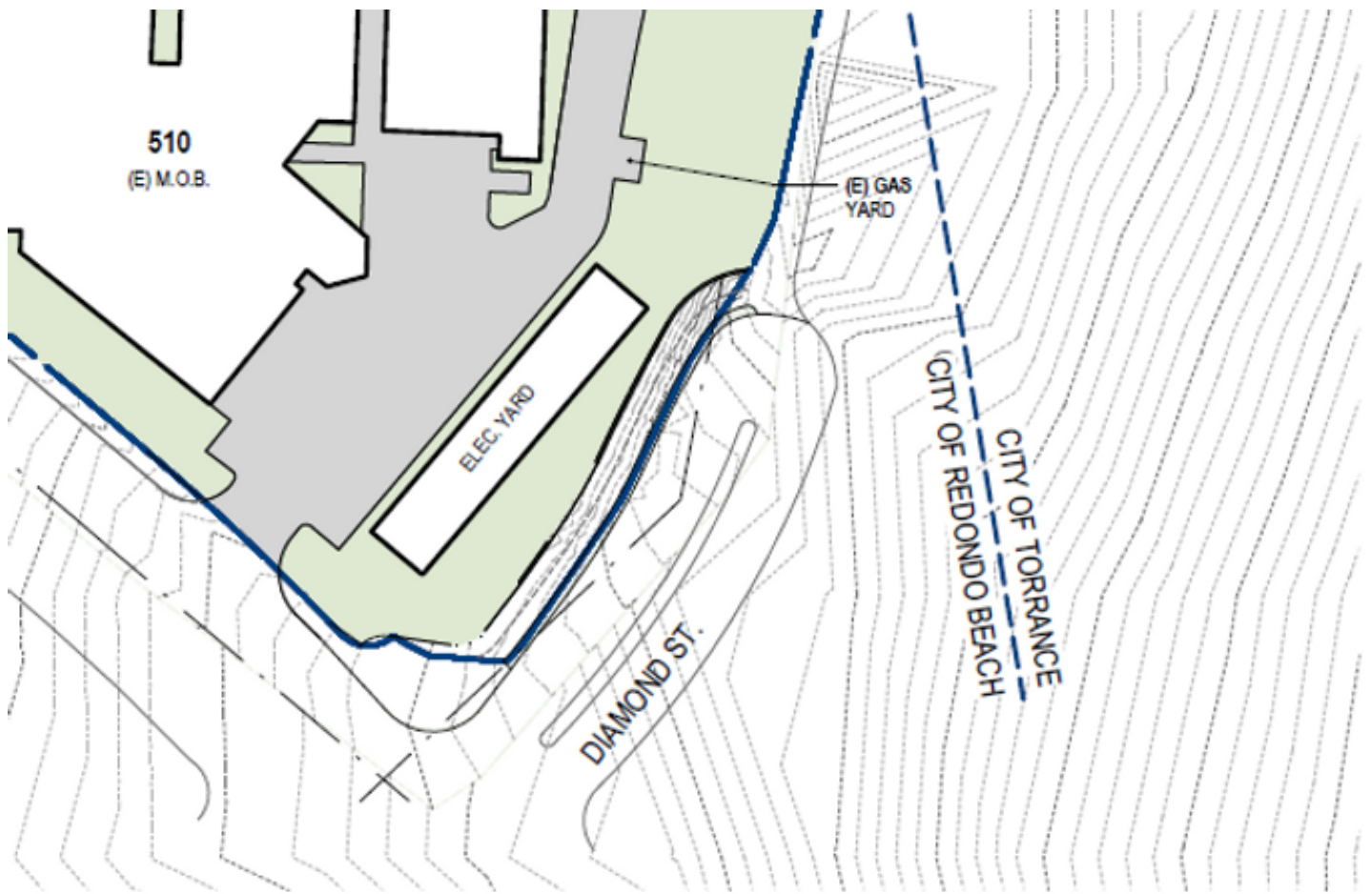
BCHDs self-certified CEQA EIR documents failed to disclose the fact that toxic and explosive backup fuel tanks would be moved adjacent to Diamond St. That was hidden from the public.

BCHD currently has its electrical transformers, backup diesel generators and fuel stored well away from homes on the campus. This relocation jeopardizes the safety, health, air quality and vibration of homes and residents along Diamond.

As a result, BCHD proposed plan fails the PCDR condition following review of utilities, and the BCHD must relocate the utilities back onto the top of the site. If Edison wants to have a transformer substation, it can go to the CPUC and get a CPCN. And under no circumstances, should there be any equipment beyond a simple 16kV to 4kV step down transformer at the south perimeter – no generator and no fuel storage.

Over a year ago, BCHD marked out the area of the generator and fuel storage along Diamond and REFUSED to tell the public the use of the space – clear evidence that BCHD was hiding its intent from the public.

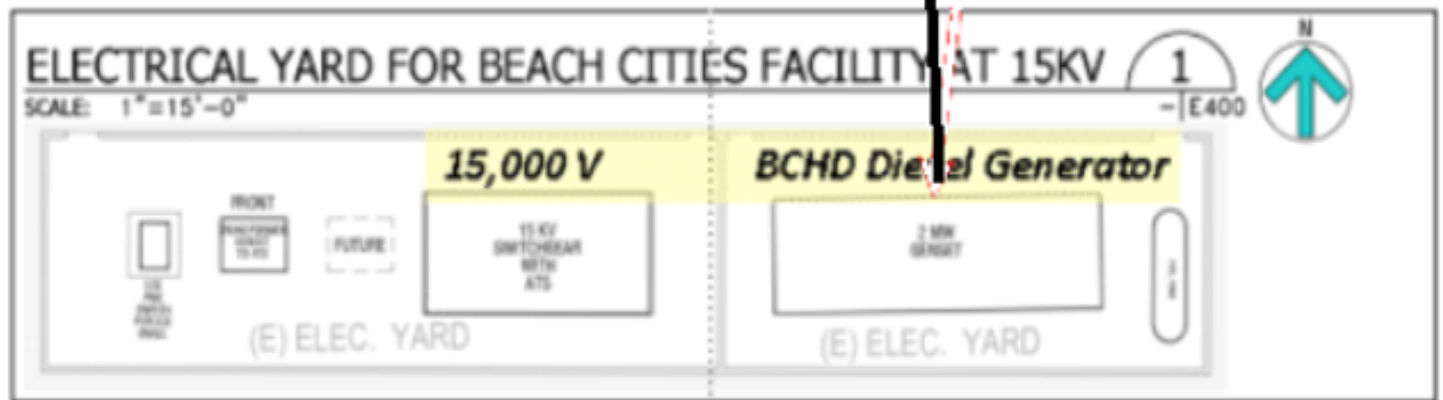
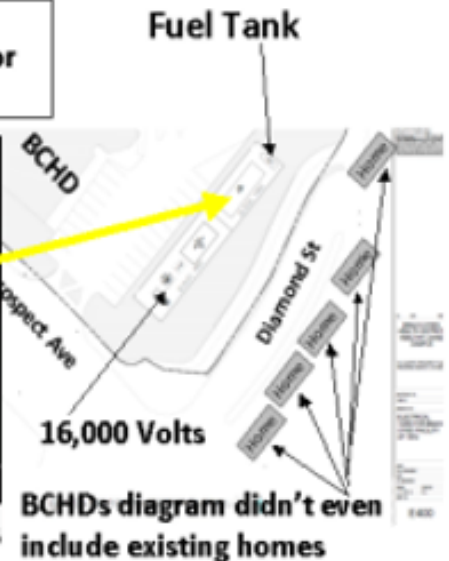
**BCHD Fails to Even Acknowledge Residences on Diamond in its Pre-CUP Submission to the City of Redondo**



BCHDs Self-Approved EIR Analysis Does Not Specify the Fuel Type, Size of Fuel Tank(s) or Specific Generator. The Self-Approval Cannot Be Valid for the Fuel Hazard or Generator Toxic Air Contaminants.

**BCHD is moving their electric generator(s) and fuel tank(s) from up behind the hospital to down next to Diamond St. where toxic air contaminants and other emissions will blow to Torrance neighborhoods**

**NOTE: To date, BCHD has provided no specific information regarding the generator, fuel tank size or fuel being stored to the surrounding neighborhoods**



Generators Must be Tested and Operated, Even if Not Outages Occur. Residents have a RIGHT to Clean Air, Free of Toxics.





# BCHD Plan Fails RBMC 10-2.2502 Planning Commission Design Review Sect b(2) "Respect Natural Terrain"

Updated: 6 days ago

BCHD fails to respect the natural terrain of its elevated site, especially due to the declining elevation surrounding the site.

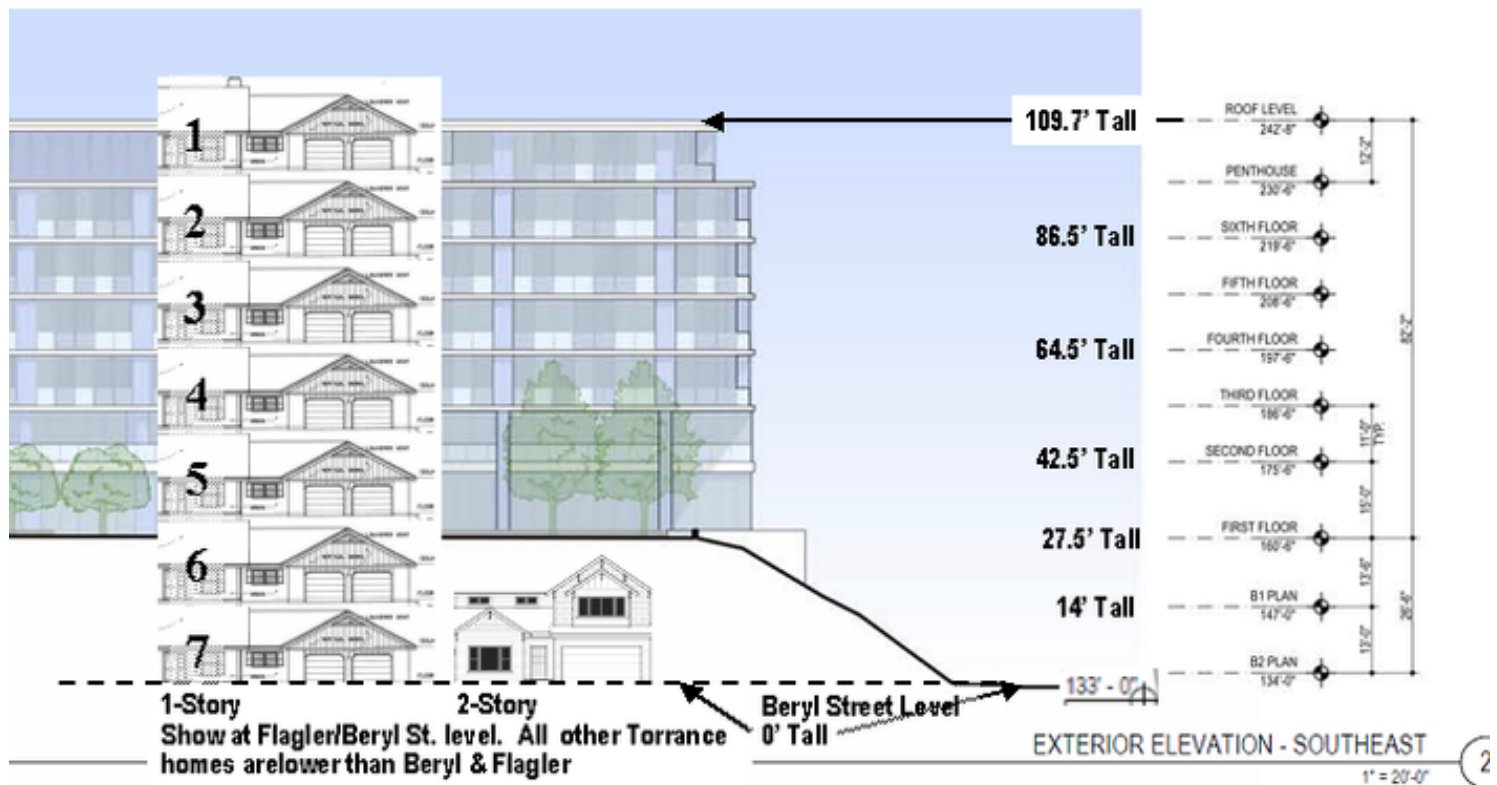
- BCHD proposes nearly 110-feet above the closest streets (Beryl & Flagler)
- BCHD proposes to build on the site perimeter, instead of in the center as the District has done previously
- BCHD proposes outward facing opening doors and balconies that will diminish privacy and increase noise levels to existing residential uses

## Mandatory Changes to the BCHD Plan

The City of Redondo Beach must enforce this provision of the RBMC to protect the surrounding residents. As demonstrated, BCHD has clearly NOT respected the natural terrain of the Public site. The BCHD facility must be lower, must be further away from the site perimeter, and must not use outward opening doors and windows on balconies in order to isolate the noise travel from the elevated site.

# BCHD Has IGNORED the Natural Terrain - Elevated 110-ft above Beryl and Flagler and 150-ft above Redbeam in Torrance

**BCHD fails to respect the elevated terrain of its site, the declining terrain surrounding its site, and the privacy of surrounding uses**



The City PROTECTED Residents With Restrictions on the Assisted Living on P-CF Public Owned and Zoned Land

**The City of Redondo Beach  
Protected the Residents at  
Knob Hill & PCH from  
Excessive Development In  
a VERY SIMILAR  
SITUATION.**

**The Kensington Redondo Beach  
Same P-CF Zoning, Surrounded by Residential and Light Commercial**



BCHD's proposal is taller than 99.7% of the existing campus buildings and 300-times more sqft OVER 52-feet than the existing campus buildings. As you can see from the evidence below - the proposed building does not respect the elevated campus in location, size or height.

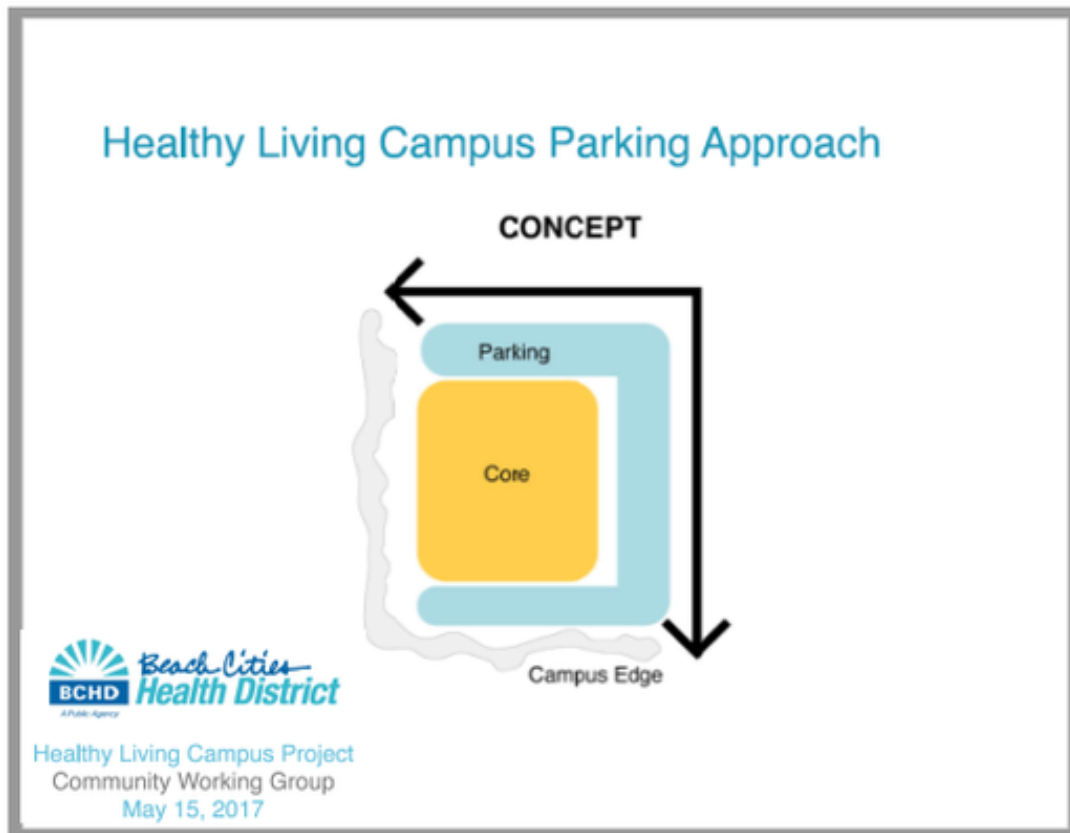


**BCHD claims this GIANT building is "Compatible" in Mass  
and Scale with the Surrounding Neighborhoods and Existing  
Buildings**

## BCHD Recognized the Additional 50-100 Years of Damage That Will Be Inflicted on Surrounding Neighborhoods by the Healthy Living Campus

As a result, BCHD proposed to buffer the neighborhoods by placing the development in the center of the 10 acre parcel and surrounding it with surface parking and landscape as a buffer.

**BCHD then proceeded to ignore its responsibility to the surrounding neighborhoods.**





stopbchd 🏰 6 days ago 2 min read

# BCHD Plan Fails RBMC 10-2.2502 Planning Commission Design Review Sect b(1) "Privacy"

BCHD proposes to allow its Developer/Owner/Operator (D/O/O) to construction a 109.7-foot above Beryl & Flagler streets structure. The structure proposes outward facing balconies, doors and windows with up to a 150-foot height advantage over Torrance Hillside Overlay and other properties.

Furthermore, the new facility on leased land will be located at the far north and east perimeters of the roughly 30-foot elevated site with expansive views into surrounding residential properties, *maximizing the BCHD project privacy invasion* and noise transfer of the open balconies. The current South Bay Hospital building is nearly centered in the site, thereby *minimizing* its visual and privacy impacts.

In addition, BCHD continues to misrepresent the height of the current campus. Only a lone, 968-sqft mechanical room (0.3% of total sqft), dubbed "the Penthouse" is at 76-feet tall. The other 311,000-sqft of the current campus buildings are below 52-feet tall. As a result, with 99.7% of the campus at or below 52-feet tall, and with the location nearly in the center of the parcel, BCHDs proposal is vastly more privacy invading that the current centered buildings.

In 2017, BCHD stated to the Community Working Group that it would buffer its damaging facility from the surrounding neighborhoods with parking and greenspace. In 2019, BCHD proposed a 60-foot structure on the north, east, and south perimeters of the 30-foot elevated lot. In 2020, BCHD approved a height increase to 76-feet. In 2021, BCHDs draft EIR showed a height of 103-feet. BCHD has demonstrated a pattern of *damages maximization* with respect to excessive height leading to *privacy damage maximization*.

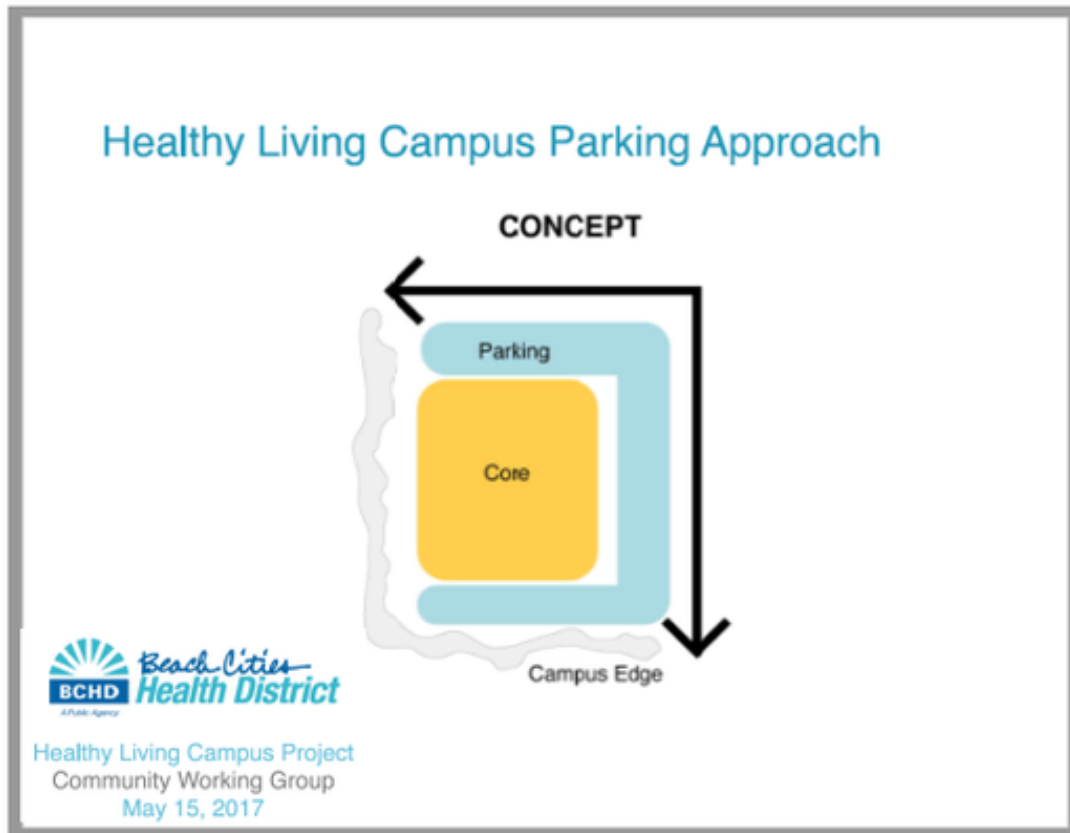
BCHD also removed 160,000-sqft of underground parking, and replaced it with a proposed 8 to 10-story parking garage at Prospect and Diamond. The proposed parking will have expansive views into surrounding residential properties and associated noise production. Again, BCHD *maximized damages* by removing its proposed underground parking and replacing it with a parking structure adjacent to residential use.

*BCHD is fully aware that building on the perimeter maximizes neighborhood damages.*

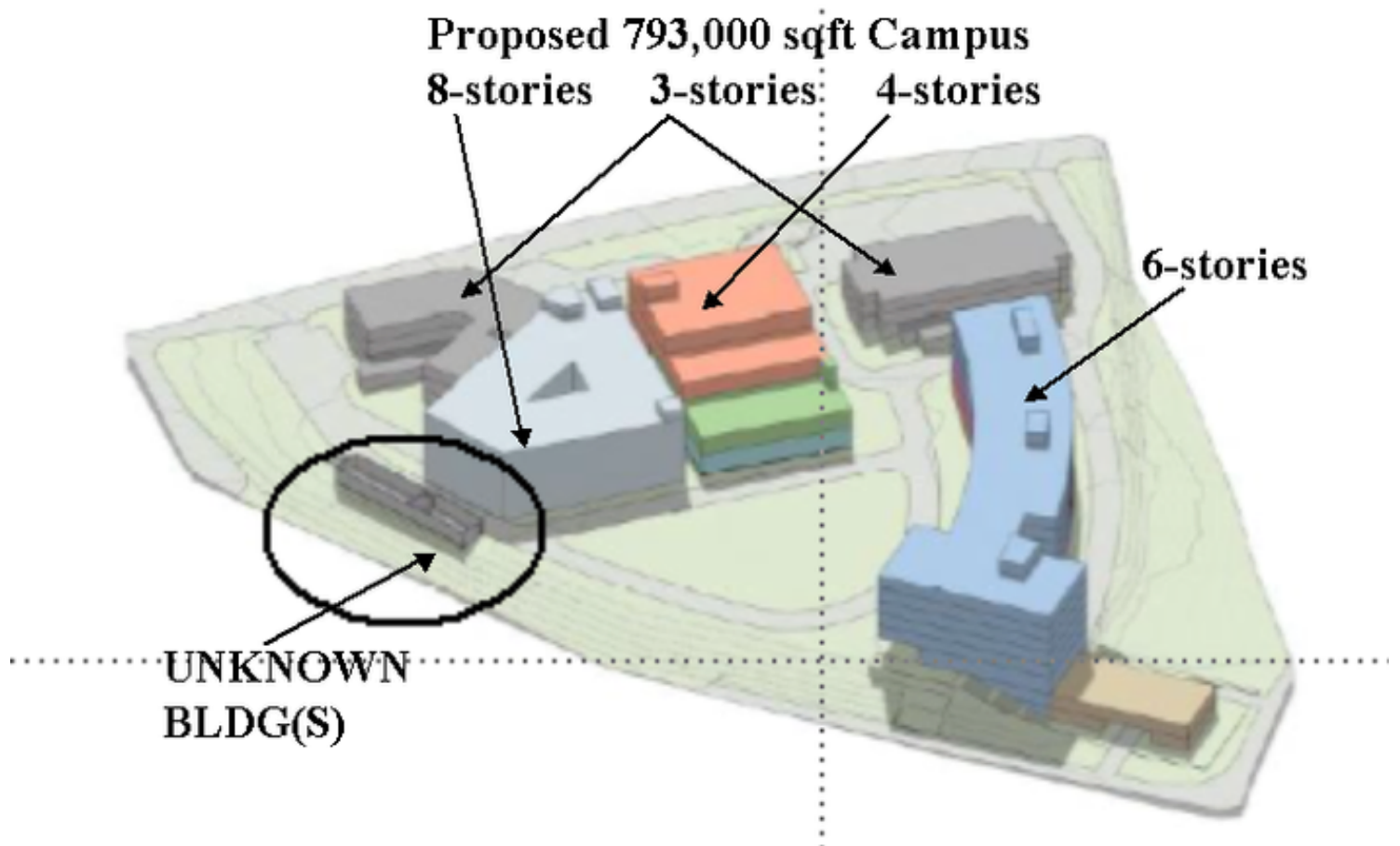
## BCHD Recognized the Additional 50-100 Years of Damage That Will Be Inflicted on Surrounding Neighborhoods by the Healthy Living Campus

As a result, BCHD proposed to buffer the neighborhoods by placing the development in the center of the 10 acre parcel and surrounding it with surface parking and landscape as a buffer.

**BCHD then proceeded to ignore its responsibility to the surrounding neighborhoods.**



*BCHD knows that an 8-10 story parking ramp and a 6-story, 110-foot building with balconies, both at the edge of the site against residential neighborhoods will damage privacy and residential use.*



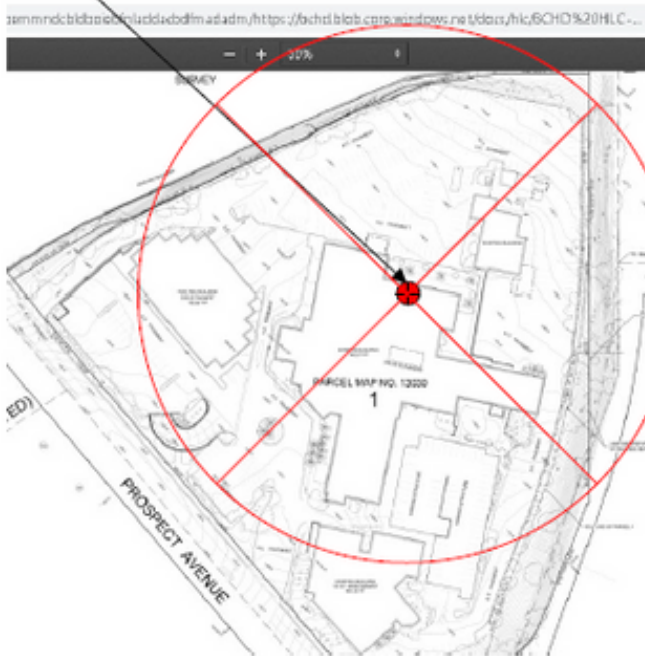
*BCHD is fully aware that only 968-sqft of the site's buildings are at 76-feet, and that the 76-foot point is nearly centered on the site - thereby minimizing visual size and privacy impacts.*

## Existing hospital maximum height of 76-feet is 968 sqft (0.3%) of campus floor space and nearly centered on plot

### "Penthouse"

968 sqft / 76-ft height  
Represents only 0.3% of campus floor space (CEQA NOP Jun 2019)

Rest of All Prospect Ave Campus Buildings  
51.5-ft or SHORTER for 99%+ of floor space



**Comment:** South Bay Hospital was sited nearly centered in the land plot in order to minimize bulk, mass, and visual disturbance to the surrounding areas. BCHD proposes to exceed the height of over 99% of the existing campus buildings with its perimeter, mass and bulk maximizing buildings.

BCHDs proposal to site the RCFE on the North and East perimeters; an 8-10 story parking structure caused by removal of 160,000 sqft of subterranean parking from the 2019 CEQA NOP Plan; and a 4-story building on the west perimeter must be rejected.

BCHD 02/02/2022 Drawing Set 3/35

*Current BCHD occupied buildings have very small privacy impacts, due to centered location and 99.7% of square feet under 52-feet tall. BCHDs 109.7-foot tall, perimeter proposal is visually much larger and provides balcony views into surrounding residential uses.*



**BCHD Tenant 109.7-ft Proposed Perimeter-located Building with Balconies Overlooking North and East Residential Neighborhoods**





stopbchd 🏰 16 hours ago 3 min read

# BCHD Plan Fails RBMC 10-2.2502 Planning Commission Design Review Sect b(4) "Balance and Integration"

The full statement in the RBMC for b(4) is "Balance and integration with the neighborhood. The overall design shall be integrated and compatible with the neighborhood and shall strive to be in harmony with the scale and bulk of surrounding properties."

BCHD proposed height fail any reasonable scale integration standard. BCHD is proposing 109.7-feet above Beryl & Flagler streets. BCHD will be approximately 150-feet above Redbeam neighborhood properties in Torrance. All surrounding zoning for BCHD, and existing structures, are 30-foot maximum zoning in Redondo Beach, and 27-foot maximum zoning in Torrance. That includes the light commercial zoning of the Vons Plaza.

BCHD proposed square feet in size fails any reasonable scale integration standard. BCHD is proposing a single 300,000 sqft building in Phase 1 that will be at 109.7-feet above Beryl & Flagler streets, and 83-feet above the internal courtyard. At 300,000 sqft, the single proposed building in Phase 1 is roughly the same size as the entire 312,000 sqft current campus buildings (according to BCHD EIR NOP). Following Phase 2, BCHD will be 800,000 sqft of buildings, which is larger than all Beryl Heights properties added together. Clearly, a facility that is larger than the entire adjacent neighborhood can make no claim of balance, integration or harmony in scale and bulk with surrounding properties.

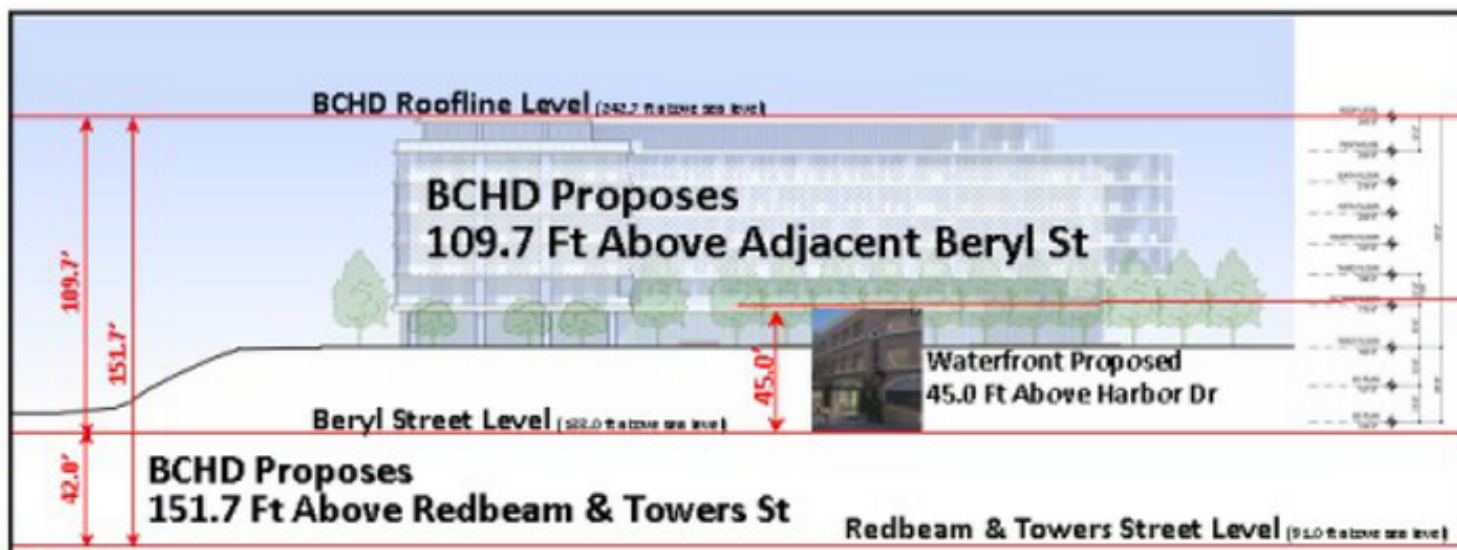
BCHDs proposed height of 83-feet above the internal courtyard is for Phase 1 provides 300,000 sqft at 83-feet. Except for a single 968-sqft mechanical room ("the Penthouse"), the rest of the 311,000 sqft of the existing campus buildings are at 52-feet or lower. Thus, BCHD has made no attempt to integrate with the neighborhood scale for Redondo Beach or Torrance, both of which are 30-feet or less. Further, BCHD has not even been balanced with the existing campus, as it nearly doubles the campus sqft of size while increasing the height to 160% of 311,000 sqft feet of existing campus.

This all fails to consider that BCHD's Phase 2 is an 8-10 story parking ramp on the south perimeter of campus and a 4-story, approximately 70-foot structure on the west side, rounding out the 800,000 sqft. Those two structures further ignore integration with the neighborhoods in scale and bulk.

BCHD proposed development is nearly all on the perimeter of the site, maximizing, not minimizing the bulk and visual size of the structures. BCHD is also ignoring its obligation to respect the natural terrain of the existing 30-foot elevated site, thereby creating a massive visual out-of-scale compound on the north, east and south where it is 100 to 150-feet above neighboring development.

In conclusion, BCHD has made no attempt to integrate in scale or bulk, nor has it met its obligation to "strive". Instead, it has ignored the neighborhood input and that of CWG members from the neighborhoods.

## BCHDs Proposal is Significantly out of Scale with Surrounding Property Heights



## BCHDs Proposal is Significantly Taller than the Existing Campus Buildings

BCHD is proposing 300,000 sqft at 83-feet while the existing campus buildings are 311,000+ sqft at less than 52-feet. Only one single 968-sqft mechanical room is 76-feet and it is located in the center of campus.

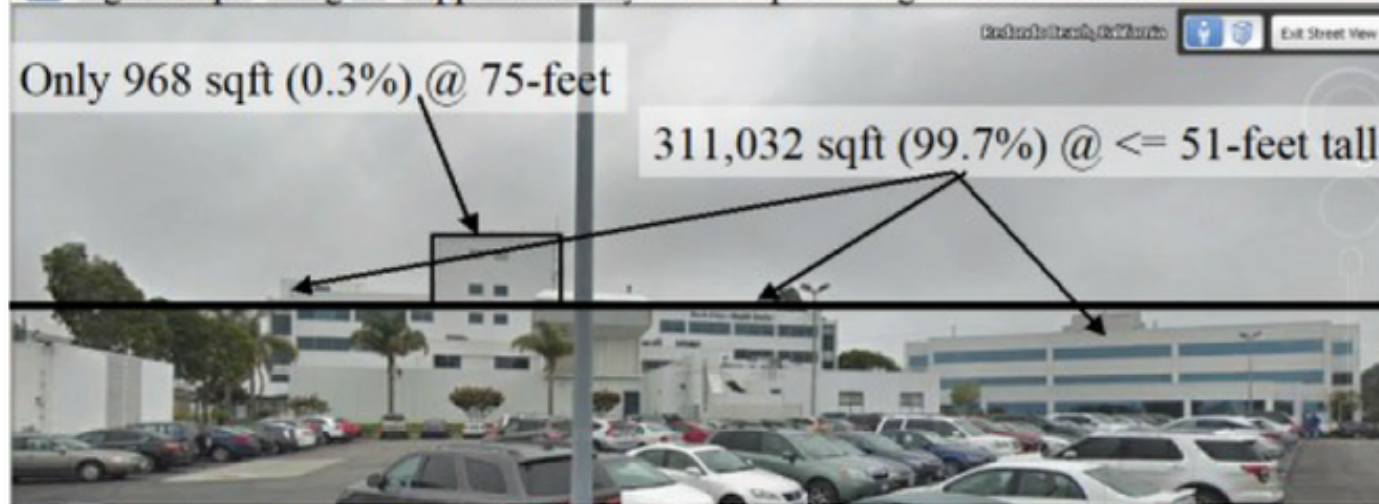
### South Bay Hospital Campus Buildings Elevation Review

Per BCHD EIR NOP, the SBHD campus is 76-feet tall and 312,000 sqft

Per BCHD PRA Response, only 968 sqft or 0.3% is 76-feet tall

That leaves **99.7% or 311,032 sqft at 51-feet tall or less (4 stories)**

Average campus height is approximately 30-feet per Google Earth Pro review

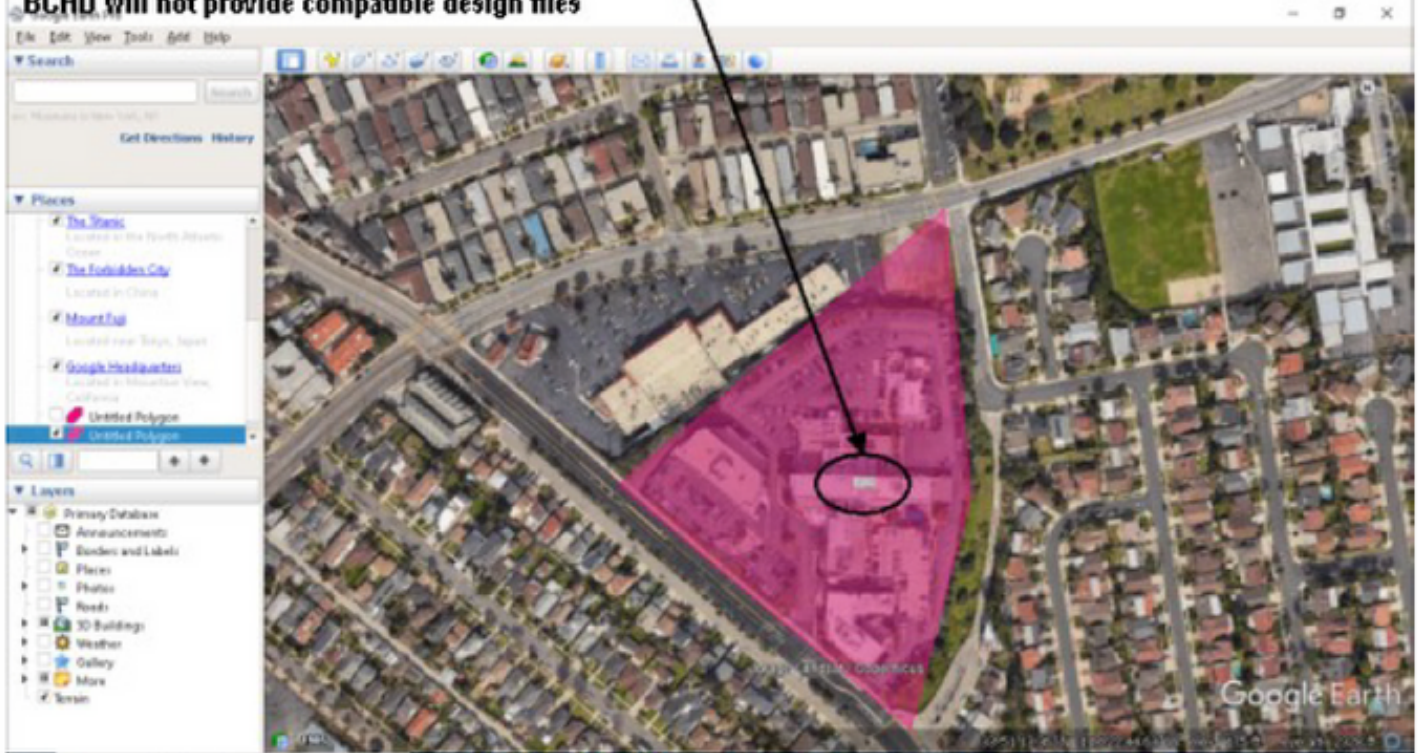


BCHDs Current 76-foot Projection is located far from perimeter of campus in a mass and height minimizing position. The remainder of the campus buildings are 52-feet or lower.

**BCHD's environmental report states the campus has 312,000 sqft of buildings. Only one little tiny "penthouse" is 76-feet tall and that 0.3% of the buildings.**

**Google Earth Pro Simulation**

**BCHD will not provide compatible design files**

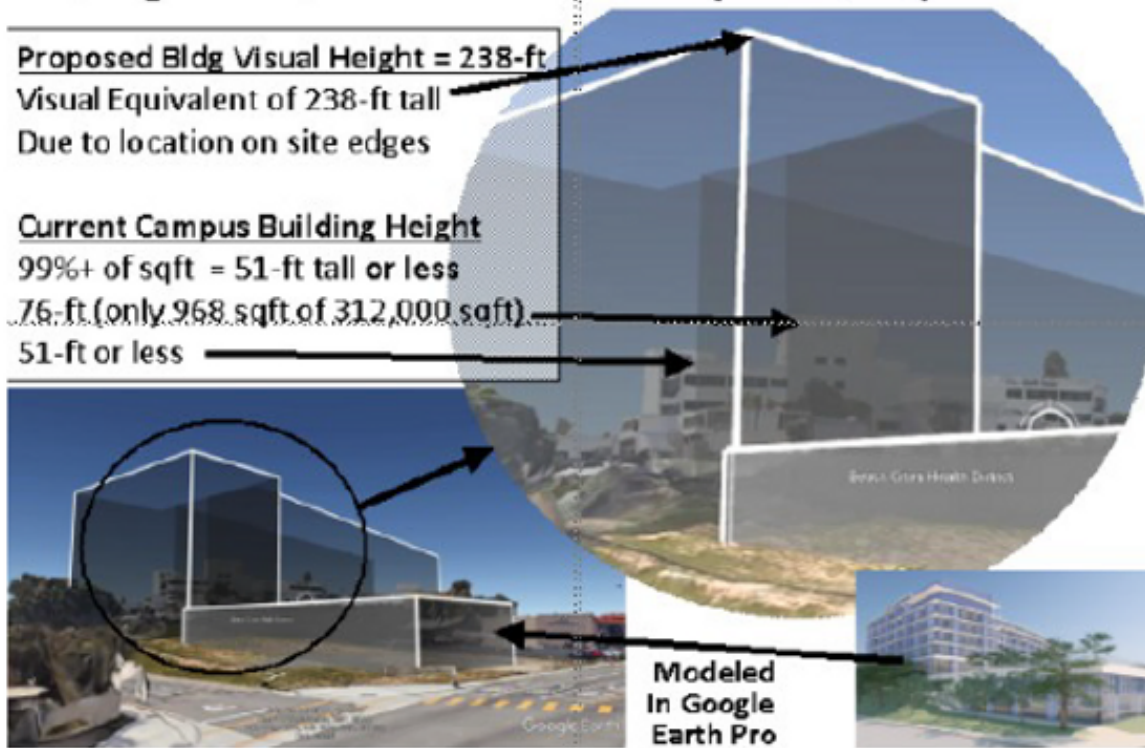


BCHDs Proposed Placement on the Perimeter of Campus Maximizes Bulk and Mass Compared to the Existing Hospital Building. BCHD Fails the "Strive" Test.

**By not respecting the elevated site terrain, BCHD creates an equivalent height of 238-feet tall from the N/NE/E Views**

Proposed Bldg Visual Height = 238-ft  
Visual Equivalent of 238-ft tall  
Due to location on site edges

Current Campus Building Height  
99%+ of sqft = 51-ft tall or less  
76-ft (only 968 sqft of 312,000 sqft)  
51-ft or less



BCHDs Proposed Commercial 1950s Miami-Style Hotel Design is Clearly Makes No Attempt to be Compatible with Residential Neighborhoods



**FONTAINEBLEAU**  
Miami Beach by VESPER

**1955 South Beach  
Commercial Area**

**2022 BCHD Redondo Beach  
Residential Neighborhoods**

The Healthy Living  
Campus Project

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**From:** William Shanney <wshanney@verizon.net>  
**Sent:** Wednesday, June 8, 2022 1:34 PM  
**To:** CityClerk <CityClerk@redondo.org>  
**Cc:** StopBCHD@gmail.com  
**Subject:** "Non-Agenda Item Public Comments for 6/16/22 Planning Commission Meeting"

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Redondo Beach Planning Commission:

Subject: Adverse impacts from BCHDs 110-foot tall, 800,000 square-foot proposed development.

We live just adjacent to the proposed BCHD development and are very concerned about the negative health impacts of this development. The EIR showed no effective noise abatement or dust control which will have negative impacts on local residents and school children. We are senior citizens who can not leave home every day while this proposed project is under construction.

We request that the Commission strictly enforce the RB Municipal Code regarding Conditional Use Permits and Planning Commission Design Review in order to protect surrounding property values and deny adverse impacts from BCHDs 110-foot tall, 800,000 square-foot proposed development.

We are in agreement with the findings in the report referenced below.

<https://www.stopbchd.com/post/public-comment-re-bchd-to-rb-planning-commissioners-6-6-22>

Sincerely,

William and Vivian Shanney

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**From:** Mark Nelson (Home Gmail) <menelson@gmail.com>

**Sent:** Wednesday, June 8, 2022 2:04 PM

**To:** CityClerk <CityClerk@redondo.org>; Michael Webb <Michael.Webb@redondo.org>

**Cc:** Al.Muratsuchi@asm.ca.gov; Ben.Allen@sen.ca.gov; HollyJMitchell@bos.lacounty.gov

**Subject:** Public Comment - Non-agenda Item - BCHD

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

Mayor, Council, Planning Commissioners, City Attorney:

BCHD asserts there is a need in the District for a 400 person PACE facility, yet, BCHD continues to withhold any documentation of the need. According to the National PACE Association, only 1 in 1000 seniors utilizes PACE, therefore, predicting only 17 PACE participants in the 3 beach cities. 100% of PACE participants must be nursing home certified. Further, 99% of PACE participants are funded by MediCaid/MediCal, a demographic that is less common in the 3 beach cities than in the country or LA county in general. Therefore, PACE has little to no NEED and is therefore of virtually NO VALUE to the 3 beach cities.

Note that BCHD withheld its administrative response to a CPRA for nearly 6 months. There is NO CONTENT in the response, so there is no reason for the delay.

Mark Nelson  
Redondo Beach

Attachment, BCHD CPRA non-response



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## RE: CPRA - PACE

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PRR <PRR@bchd.org>

Wed, Jun 8, 2022 at 1:49 PM

To: "Mark Nelson (Home Gmail)" <menelson@gmail.com>, PRR <PRR@bchd.org>

Mark,

Please see below (in red) for the District's response to your public records request received 1/28/22 that reads:

CPRA REQUEST - Provide all documents demonstrating BCHDs estimate usage of the planned 400 person PACE by zip code.

To the extent that your request seeks records that are not related to final determinations, or to records that have not already been published, such information remains privileged by the District. The District plans to announce the proposed partner for the PACE program this summer/fall.

Below is additional information/context:

Under the Public Records Act ("PRA"), Cal. Gov. Code § 6254 sets forth certain categories of records that have been exempted from the disclosure requirements of the PRA. These exemptions have been enumerated due to concerns regarding the confidentiality and sensitivity of the information contained therein. Additionally, Cal. Gov. Code § 6255 recognizes that not every specific category of records can be detailed in a statute, and instead sets forth a standard under which any record may be exempt from disclosure if "the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record." This same balancing-of-interests test is also set forth in the §6254(a) exemption related to preliminary drafts, notes and intra-agency memoranda. One of the important public interests that the California Supreme Court has recognized as exempting documents from disclosure is known as the "deliberative process privilege."

Under the deliberative process privilege, senior officials of all three branches of government are not required to disclose or to be examined concerning the mental processes by which a given decision was reached, as well as the substance of conversations, discussions, debates, deliberations, and like materials reflecting advice, opinions, and recommendations by which government policy is processed and formulated. California courts have recognized three policy bases for the deliberative process privilege: (1) It protects creative debate and candid consideration of alternatives within an agency, (2) it protects the public from the confusion that would result from premature exposure to discussions occurring before the policies affecting it had actually been settled on, and (3) it protects the integrity of the decision-making process itself by confirming that officials should be judged by what they decide, not for matters they considered before making up their minds. Cal. First Amendment Coalition v. Superior Court, 67 Cal. App. 4th 159 (quoting Times Mirror Co. v. Superior Court, 53 Cal. 3d 1325, 1351 [1991], Jordan v. United States Dept. of Justice 591 F.2d 753, 772-773 [D.C. Cir. 1978]). "Courts have been particularly vigilant to protect communications to the decision maker before the decision is made." Times Mirror Co. v. Superior Court, 53 Cal. 3d 1325, 1341 (1991).

Additionally, Cal. Gov. Code § 6254(k) exempts from disclosure records that are otherwise privileged under state law, such as "official information", which is information provided to a government entity on a confidential basis, and "trade

secrets", such as proprietary tools and assessments developed by a third party.

The identified requests seek exactly the type of pre-decisional information that is protected by the deliberative process privilege, such as proposals, analyses, and preliminary reports that may contain internal discussions and recommendations considered by the District prior to reaching final conclusions.

Per the District Notice to you dated March 1, 2022, Re: Notice of Suspension of Document Production, and after the District has notified you in accordance with this Notice that the back-log of your Public Records Requests have been fully processed, if you believe we have not correctly interpreted your request, you may thereafter resubmit your request with a description of the identifiable record or records that you are seeking.

Thank you.

Creating a healthy beach community.

## Protect Yourself and Others from COVID-19



Get Vaccinated and Boosted • Upgrade Your Mask • Wash Your Hands • Stay Home and Test When Sick

THE PRECEDING E-MAIL, INCLUDING ANY ATTACHMENTS, CONTAINS INFORMATION THAT MAY BE CONFIDENTIAL, BE PROTECTED BY ATTORNEY CLIENT OR OTHER APPLICABLE PRIVILEGES, OR CONSTITUTE NON-PUBLIC INFORMATION. IT IS INTENDED TO BE CONVEYED ONLY TO THE DESIGNATED RECIPIENT. IF YOU ARE NOT THE INTENDED RECIPIENT OF THIS MESSAGE, PLEASE NOTIFY THE SENDER BY REPLYING TO THIS MESSAGE AND THEN DELETE IT FROM YOUR SYSTEM. USE, DISSEMINATION, DISTRIBUTION, OR REPRODUCTION OF THIS MESSAGE BY UNINTENDED RECIPIENTS IS NOT AUTHORIZED AND MAY BE UNLAWFUL.

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**From:** Mark Nelson (Home Gmail) <[menelson@gmail.com](mailto:menelson@gmail.com)>  
**Sent:** Friday, January 28, 2022 12:40 PM  
**To:** PRR <[PRR@bchd.org](mailto:PRR@bchd.org)>  
**Cc:** Paul Novak <[pnovak@lalafco.org](mailto:pnovak@lalafco.org)>  
**Subject:** CPRA - PACE

Based on the following facts, use of PACE will be de minimis in the 3 beach cities

1) PACE requires nursing home need certification

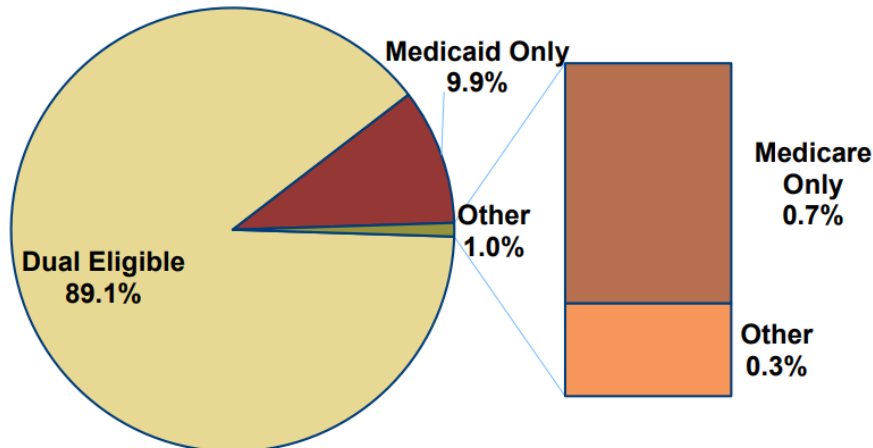
## Who can get PACE?

You can have either Medicare or Medicaid, or both, to join PACE. PACE is only available in some states that offer PACE under Medicaid. To qualify for PACE, you must:

- Be 55 or older
- Live in the service area of a PACE organization
- Need a nursing home-level of care (as certified by your state)
- Be able to live safely in the community with help from PACE

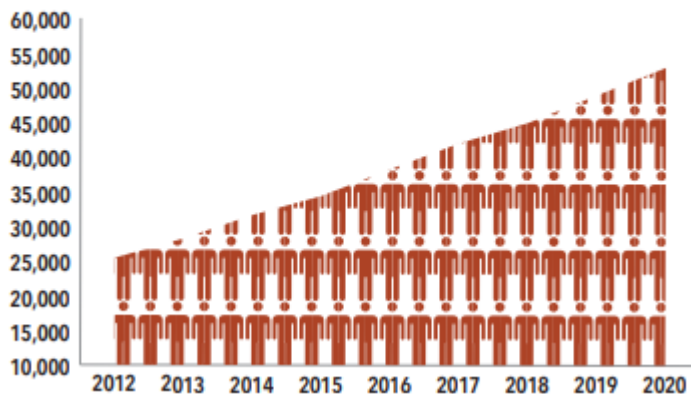
2) Only 1% of participants are cash buyers, 99% have Medicaid for nursing home coverage

### 99% of PACE enrollees are Medicaid eligible



3. Only 1 in 1000 seniors participates, with a consistent, roughly 10% linear growth rate that doubles every 7 years

### PACE ENROLLMENT APPROXIMATELY 55,000



4. PACE is available in the 3 beach cities, there are 16,000 seniors in the 3 beach cities, which implies only 16 participants "IF AND ONLY IF" the 3 beach cities have the same Medicare+Medicaid population fraction as the US, and that is very doubtful, especially for anyone with the asset of a residence.

CPRA REQUEST -

Provide all documents demonstrating BCHDs estimate usage of the planned 400 person PACE by zip code.



---

**From:** Paul Lieberman <lieberman.lra@gmail.com>  
**Sent:** Wednesday, June 8, 2022 9:22 PM  
**To:** CityClerk <CityClerk@redondo.org>  
**Subject:** BCHD

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

Gentlemen,

As a homeowner a few blocks away from this proposed monstrous building overshadowing my home, I request you skip this project. I do not look forward to the more than five years of construction and all that it entails.

You are the Health District. The dirt, dust, noise, traffic...is not going to do my health any good.

Dr. Paul Lieberman, President  
Lieberman Research Associates (LRA)  
19815 Mildred Avenue  
Torrance, CA 90503-1121  
310.371.2198  
[LIEBERMAN.LRA@GMAIL.COM](mailto:LIEBERMAN.LRA@GMAIL.COM)

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**From:** gtafremow@verizon.net <gtafremow@verizon.net>  
**Sent:** Wednesday, June 8, 2022 6:20 PM  
**To:** CityClerk <CityClerk@redondo.org>  
**Cc:** StopBCHD@gmail.com  
**Subject:** Non-Agenda Item Public Comments for 6/16/22 Planning Commission Meeting

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

We are asking the Commissioners to strictly enforce the RB Municipal Code regarding Conditional Use Permits and Planning Commission Design Review in order to protect surrounding property values and deny adverse impacts from BCHDs 110-foot tall, 800,000 square-foot proposed development.

Sincerely,  
George & Pam Afremow  
Concerned long term residents