

**From:** [Glen and Nancy Yokoe](#)  
**To:** [CityClerk](#); [cityclerk@torranceca.gov](mailto:cityclerk@torranceca.gov); [Stop BCHD](#)  
**Subject:** BCHD HLC Project  
**Date:** Wednesday, July 27, 2022 5:28:05 PM

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To Whom It May Concern,

I have written and spoken up against the BCHD HLC multiple times. I continue to do so as a concerned, long-time resident of west Torrance.

The HLC(Healthy Living Campus), as designed, is an expansive behemoth. It towers over and is out of character with the surrounding neighborhoods and businesses. The excavation, demolition, concrete grinding and transport of debris is a 24/7 health hazard to all that live and work nearby. Most concerning are the effects of 5+ years of airborne pollution of irritants and carcinogens on our most vulnerable school children at Beryl Heights Elementary School in RB and Towers Elementary School in west Torrance.

Noise will be beyond acceptable standards for residential areas. It will have an unbearable effect on those nearby and noise itself has been shown to have deleterious effects on one's wellbeing.

Heavy truck trips will add to an already congested traffic situation. Just ask any parents who take and pick up children going to and from the two elementary schools mentioned, about a quarter of a mile apart.

The CEO and BoD of BCHD seem to have forgotten what the "H" stands for in their acronym. They have lost touch with the negative effects of their HLC, and that will have on the surrounding community.

Respectfully, Glen H. Yokoe, PharmD

**From:** [M. Nava](#)  
**To:** [Info@lalafco.org](mailto:Info@lalafco.org)  
**Cc:** [CityClerk](#); [cityclerk@torranceca.gov](mailto:cityclerk@torranceca.gov)  
**Subject:** BCHD Public Comment for September 2022 LALAFCO Board Meeting  
**Date:** Tuesday, August 2, 2022 10:02:27 AM

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

Dear Board Members of LALAFCO:

This is a comment for your September 2022 Board meeting where you will be considering the BCHD Municipal Service Review report.

BCHD should be dissolved because it is not operating for the benefit of, or in the best interest of the residents of the District.

If BCHD's project proceed, District residents will lose 3 acres of our land for up to 95 years when BCHD signs a lease with a private developer/owner/operator and if BCHD receives the needed permits from the Cities of Redondo Beach and Torrance. The developer plans to build a \$12,000+/month assisted living facility for people with \$200,000 and above incomes. The private facility is being built for 80% non-residents of the District.

BCHD will have no ownership in the project.

Even though BCHD will receive a rent payment of \$1.5M per year for the land, BCHD will have to pay more than half of that back to the developer in rent for BCHD's new offices and facilities in the developer's building.

BCHD has already signed a deal for a youth wellness program called "allcove" where BCHD will provide services as far away as Long Beach. 91% of the service area for BCHD's program will be non-residents of the District.

BCHD plans to offer an adult daycare program called PACE. BCHD refuses to say how many PACE participants they think will be from the District. National statistics show that the District should expect only 16 out of its 400 person planned capacity to come from the three beach cities. 96% of PACE enrollees will be non-residents of the District.

When South Bay Hospital District was voted into existence, it was for the benefit of the residents of the District. It is bond and property tax funded by the residents.

BCHDs proposed future project, the HLC, is for over 80% non-residents of the District. Even during Covid, BCHD tested nearly 85% non-residents and left District taxpayers with several million dollars in costs for out-of-District services and overheads.

If BCHD prefers to serve non-residents of the District, then it should be dissolved and the District's property tax funding put to better health uses inside the District. Please add my comment to the Municipal Service Review record at the September Board meeting as a formal comment in favor of opening a proceeding to dissolve BCHD.

Thank you.

Marcio N

**From:** [Deb Whitcas](#)  
**To:** [Info@lalafco.org](mailto:Info@lalafco.org)  
**Cc:** [CityClerk](#); [cityclerk@torranceca.gov](mailto:cityclerk@torranceca.gov)  
**Subject:** BCHD Public Comment for September 2022 LALAFCO Board Meeting  
**Date:** Monday, August 1, 2022 8:01:23 PM

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Dear Board Members of LALAFCO:

This is a comment for your September 2022 Board meeting where you will be considering the BCHD Municipal Service Review report.

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If BCHD's project proceeds, District residents will lose 3 acres of our land for up to 95 years when BCHD signs a lease with a private developer/owner/operator and if BCHD receives the needed permits from the Cities of Redondo Beach and Torrance. The developer plans to build a \$12,000+/month assisted living facility for people with \$200,000 and above incomes. The private facility is being built for 80% non-residents of the District.

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BCHDs proposed future project, the HLC, is for over 80% non-residents of the District. Even during Covid, BCHD tested nearly 85% non-residents and left District taxpayers with several million dollars in costs for out-of-District services and overheads.

If BCHD prefers to serve non-residents of the District, then it should be dissolved and the District's property tax funding put to better health uses inside the District. Please add my comment to the Municipal Service Review record at the September Board meeting as a formal comment in favor of opening a proceeding to dissolve BCHD.

Thank you.

Deborah J Whitcas

cc: City Councils of Torrance and Redondo Beach

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

From: Mark Nelson (Home Gmail)  
 To: info  
 Cc: CityClerk; CityClerk; cityclerk@manhattanbeach.gov; cityclerk@hermosabeach.gov  
 Subject: LALAFCO Board Comments for August 2022 Meeting  
 Date: Thursday, July 28, 2022 5:47:40 PM  
 Attachments: image.png  
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To Board Members and Alternates of LALAFCO (Non-Agenda Public Comment)  
 CC: Mayors, Councils, Planning Commissions of Redondo, Hermosa, Manhattan Beach and Torrance (Non-Agenda Public Comment)

BCHD has inked and spent communications resources on a deal to provide "allcove" services to a supermajority non-residents of the District, and to a supermajority of non-residents of the SOI. BCHD made no application to LALAFCO that has been disclosed, and I fail to see how providing SUPERMAJORITY service outside of the SOI is allowable.

LOCATIONS SERVED BY BCHD PROGRAM	POPULATION	POPULATION FRACTION	ALLOCOVE	SAFE IN THE SOUTH BAY	RCFE	PACE	COVID TESTS	AVERAGE BCHD PROGRAM ACTIVITY	ALLOCOVE
Source	US Census	Computed	BCHD Press Releases	BCHD Press Releases	BCHD MDS Consultant Report	NPAOnline estimator	LACDPH	Computed	
Non-Resident Share		81.3%	81.3%	83.6%	85.9%	86.7%	84.0%	83.1%	81.3% NON-RESIDENTS OF DISTRICT
BCHD Resident Share		8.7%	8.7%	36.4%	19.4%	4.3%	16.0%	16.9%	8.7% RESIDENTS OF DISTRICT
									23.9% TOTAL SOI WITH DISTRICT
									77.0% NON-RESIDENTS OF DISTRICT AND SOI
Athens	9,000	0.6%	0.6%	0.0%	0.0%	0.0%			
Avalon	3,700	0.3%	0.3%	0.0%	0.0%	0.0%			
Carson	90,000	6.4%	6.4%	0.0%	0.0%	0.0%			
Catalina Island	300	0.0%	0.0%	0.0%	0.0%	0.0%			
El Segundo	17,000	1.2%	1.2%	5.1%	2.9%				
Gardena	60,000	4.3%	4.3%	0.0%	0.0%				
Harbor City	25,000	1.8%	1.8%	0.0%	0.0%				
Hawthorne	87,000	6.2%	6.2%	0.0%	0.0%				
Inglewood	110,000	7.9%	7.9%	0.0%	0.0%				
Lawndale	33,000	2.3%	2.3%	0.0%	0.5%				
Lennox	22,000	1.6%	1.6%	0.0%	0.0%				
Long Beach	467,000	33.1%	33.1%	0.0%	0.0%				
Hermosa	19,000	1.3%	1.3%	5.7%	2.9%	0.7%			
Manhattan	36,000	2.6%	2.6%	10.7%	8.4%	1.3%			
PVE	13,000	0.9%	0.9%	0.0%	10.5%				
Rancho Dominguez	15,000	1.1%	1.1%	0.0%	0.0%				
RPV	42,000	3.0%	3.0%	12.5%	19.5%				
Redondo Beach	67,000	4.8%	4.8%	20.0%	8.1%	2.4%		1.0%	
Rolling Hills	1,500	0.1%	0.1%	0.4%	1.2%				
RHE	8,000	0.6%	0.6%	2.4%	6.5%				
San Pedro	86,000	6.1%	6.1%	0.0%	0.0%				
Torrance	145,000	10.3%	10.3%	43.2%	10.1%				
Wilmington	53,000	3.8%	3.8%	0.0%	0.0%				
Beyond Listed Cities		0.0%	0.0%	0.0%	30.0%				
Total Population	1,409,500								
BCHD Cities	122,000								
BCHD Residents as Fraction Total Population or Benefits		8.7%	8.7%	36.4%	19.4%	4.3%	16.0%	16.9%	

1) BCHD kept no records of testing city of residence. LACDPH offered total fraction data of BCHD vs Non-Residents  
 2) MDS report states 30% of RCFE tenants will be from outside listed zipcodes  
 3) Palos Verdes Peninsula Cities disaggregated by population shares  
 4) RCFE data based on BCHD MDS Consultant report  
 5) Covid testing based on LA County Dept of Public Health after BCHD responded that it was not tracking resident vs non-resident  
 6) PACE is based on National PACE Association data of 1 in 1,000 seniors utilizing PACE. BCHD is proposing a 400 enrollee program with 17 residents

Furthermore, BCHD will be paying between an annual lease rate for this supermajority of non-residents between \$250K-\$370K annually to rent space for "allcove", with 91% of the cost for non-residents of the District and 100% of future obligations and risk accruing to District residents.

Annual Lease Rate	PACE	\$392,165	\$535,899	\$572,012
	Youth Wellness	\$254,853	\$351,468	\$371,808
	Community Service	\$175,651	\$120,120	\$256,180
	Total	\$822,669	\$1,007,487	\$1,200,000

I can easily understand how incidental use could extend to Long Beach. I have no conception of how BCHD is planning for 75% non-residents of the SOI and 91% non-residents of the District without any formal hearings or analysis by LALAFCO.

I am requesting a formal investigation of BCHD practices in this matter.

Mark Nelson  
 Former 3+ Year BCHD Volunteer  
 Redondo Beach Taxpayer-Owner of BCHD

**From:** [Dan Smith](#)  
**To:** [Paul Novak](#); [Al.Muratsuchi@asm.ca.gov](#); [Ben.Allen@sen.ca.gov](#); [HollyJMitchell@bos.lacounty.gov](#); [Bill Brand](#); [cityclerk@hermosabch.org](#); [cityclerk@manhattanbeach.gov](#); [CityClerk](#); [Nils Nehrenheim](#); [Laura Emdee](#); [Christian Horvath](#); [Todd Loewenstein](#); [Zein Obagi](#)  
**Cc:** [Tom Bakaly \(he/him/his\)](#); [Cristan Higa](#); [Kevin Cody](#); [Lisa Jacobs](#); [Noel Chun](#); [Michelle Bholat](#); [Martha Koo](#); [Jane Diehl](#); [Vanessa I. Poster](#); [letters@dailybreeze.com](#); [letters@latimes.com](#); [Monica Suua \(she/her/hers\)](#)  
**Subject:** More Facts (and a news release) about BCHD and the Healthy Living Campus Project  
**Date:** Tuesday, July 26, 2022 7:00:35 PM  
**Attachments:** [HLC\\_mythsfact\\_Round4\\_072622.pdf](#)  
[HLC developer\\_lessee\\_process\\_final.pdf](#)

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Hello,

In addition to the attached July edition of “Myth v. Fact” from Beach Cities Health District, today’s message also includes a news release with information about an agenda item for the BCHD Board of Directors meeting tomorrow night (July 27): the recommendation of a developer / lessee for the Residential Care for the Elderly facility that is part of the Healthy Living Campus revitalization plan.

If you’re interested in participating in Wednesday’s BCHD Board meeting, the agenda, meeting link and more is available at <https://www.bchd.org/board-directors-meetings>.

Here’s one more “myth v. fact” item, with multiple facts provided by BCHD’s Chief Financial Officer, Monica Suua:

**Myth:** “The BCHD project is bad for taxpayers.” (paraphrasing e-mails that have previously been sent to you as a public official)

**Facts:**

- The plan calls for a Public Private Partnership (P3) – which doesn’t use taxpayer money
- Taxpayers will get more return on their investment
- The developer/operator/lessee will pay the City of Redondo Beach property taxes for the land and building
- There is a local market demand for Assisted Living/Memory Care
- Units offered at 10% below market rate is part of the development plan
- District Cities, Schools will continue to receive funds from BCHD

If you have any questions, please reach out to me or our CEO, Tom Bakaly (cc’d), anytime. We look forward to working with you.

**Dan Smith**

*(he/him)*

*Director of Communications*

Beach Cities Health District

1200 Del Amo St., Redondo Beach, CA 90277

Ph: 310-374-3426, x156

[www.bchd.org](http://www.bchd.org)

[www.facebook.com/beachcitieshealth](https://www.facebook.com/beachcitieshealth)

## Protect Yourself and Others from COVID-19



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## **Developer-Lessee Recommended for Beach Cities Health District's Campus Revitalization Project**

***Proposed Residential Care for the Elderly facility to be part of modern campus that serves as  
hub for preventive health***

**Media Contact:** Dan Smith, BCHD, (310) 374-3426, x. 8156 or [dan.smith@bchd.org](mailto:dan.smith@bchd.org)

**REDONDO BEACH (July 26, 2021)** – As part of a rigorous selection process, a Beach Cities Health District (BCHD) subcommittee has recommended PMB LLC, a San Diego-based real estate developer & Watermark, a Tucson-based senior living operator, to build and operate a Residential Care for the Elderly (RCFE) facility at the BCHD Campus. The recommendation has been submitted to the district's Board of Directors for consideration at their meeting Wednesday night.

BCHD is in the midst of revitalizing its 60-year-old, 11-acre Redondo Beach campus, which will include the proposed 217-unit RCFE facility to provide assisted living and memory care.

"The RCFE will serve as a centerpiece for our campus, a modern, environmentally sustainable complex that will serve older adults, local youth and everybody in between," says BCHD CEO Tom Bakaly.

"Housing is a health need, and with Baby Boomers turning 66 years old by 2030, we're creating space for Beach Cities older adults to age gracefully while receiving assistance including healthcare, housing, and activities of daily life (ADLs). So, after a thorough review process with input from citizens, we've identified a highly qualified senior living partner."

BCHD management and Cain Brothers, a healthcare investment banking firm, prepared a Request for Qualifications, a Request for Proposal and established a framework and schedule to solicit, evaluate and recommend qualified firms to develop and operate the proposed RCFE.

One of the key components of the process has been community participation. An RCFE Advisory Working Group (AWG) was formed as a subcommittee of BCHD's Property Committee. The AWG, comprised of three BCHD community members and four members of BCHD Management, provided public participation in the selection process by assisting with the evaluation of RFQ & RFP proposals and transaction structure and terms. The AWG was unanimous in their selection of PMB LLC & Watermark.

This recommendation next goes before the BCHD Board of Directors at Wednesday's meeting (July 27), when the process, scoring methods and results will be presented. The board will review the staff recommendation, then will consider finalizing the selection and terms of the deal at a special meeting to be scheduled for August.

The other finalists are: RhodesMoore Development, based in Cardiff; and Senior Resource Group, based in Solana Beach.

The energy-efficient, seismically compliant redeveloped campus will include a youth wellness center, out-patient programs that help people age in their homes, community activities ranging from Yoga to

cooking classes that promote preventive health, and two acres of green space and bike/walking paths replacing acres of asphalt.

The finance model for the campus revitalization is a public-private partnership, which utilizes private investments in public projects to bolster taxpayers' return on investment. This philosophy enabled BCHD to provide a \$3.01-to-\$1 return on investment for tax revenues received in fiscal year 2020-21.

The agenda and board packet for Wednesday's meeting is available at <https://www.bchd.org/board-directors-meetings>.

### **About Beach Cities Health District**

Beach Cities Health District (BCHD) is a healthcare district focused on preventive health and serves the communities of Hermosa Beach, Manhattan Beach and Redondo Beach. Established in 1955 as a public agency, it offers an extensive range of dynamic health and wellness programs, with innovative services and facilities to promote health and prevent diseases across the lifespan. BCHD also operates AdventurePlex, a health and fitness facility where kids play their way to good health, and the Center for Health & Fitness, a comprehensive fitness center that is the only Medical Fitness Association-certified facility in California. BCHD was named the 2021 "Special District of the Year" by the Association of California Healthcare Districts. Visit [www.bchd.org](http://www.bchd.org) or call (310) 374-3426 for more information.

###

# Beach Cities Health District's HEALTHY LIVING CAMPUS



## MYTH vs FACT

With Beach Cities Health District's Healthy Living Campus in the Conditional Use phase, we're here to help separate myths from the facts.

For more information, visit [www.bchdcampus.org](http://www.bchdcampus.org)

MYTH	FACT
<p>"We were told that the building size was reduced in order to keep market rents high and not saturate the market." (M. Nelson e-mail to elected officials, June 16, 2022)</p>	<p>Pants on fire false. The building size was reduced to restrict its height as a response to neighbors' concerns about units overlooking the Torrance neighborhood. When the plan was reconfigured, moving the RCFE building to the northern border of the property, the overall size was reduced – from 461,000 sf in the 2019 plan to 283,070 sf in the 2020 design – in an effort to restrict the building's height.</p>
<p>"According to statute, even if BCHD is allowed to participate in either class of venture (PACE or RCFE), it would be a de novo service and would require activation of a latent power, if, that latent power can be demonstrated by BCHD to be allowable." (M. Nelson to city clerks and LA LAFCO, June 23, 2022)</p>	<p>He's looking at the wrong statute, referencing a case involving an Irrigation Special District. "The Local Health Care District Law" (California Health Care District Law, section 32000; amended by Stats. 1994, Ch. 696, Sec. 1.) went into effect January 1, 1995 and enumerates various powers granted to health care districts including, but not limited to:</p> <ul style="list-style-type: none"> <li>• Operating health care facilities such as hospitals, clinics, skilled nursing facilities, adult day health centers, nurses' training schools, retirement facilities and childcare facilities.</li> <li>• Operating programs that provide chemical dependency services, health education, wellness and prevention, rehabilitation and aftercare.</li> <li>• Carrying out activities through corporations, joint ventures or partnerships.</li> <li>• Establishing or participating in managed care.</li> <li>• Contracting with and making grants to provider groups and clinics in the community.</li> <li>• Other activities that are necessary for the maintenance of good physical and mental health in communities served by the district.</li> </ul>
<p>"This property was acquired by eminent domain/condemnation for the specific public purpose of building and operating a hospital at the site. The hospital closed many years ago, as your records presumably show. BCHD has not, as far as I know -- and as far as BCHD has stated to me in email -- taken any steps, pursuant to a Resolution of Necessity, to establish any new public use or uses." (T. Ozenne email to City of Redondo Beach officials, July 5, 2022)</p>	<p>To keep pace with the health care changes and give local health care and hospital districts greater latitude, in 1994, the legislature began amending the original state law. Section 32121 of the Health and Safety Code provides Special Districts the power "to do any and all things that are necessary for, and to the advantage of" any type of health promoting service or health care facility. In short, the law generally allowed for anything that is 'necessary for the maintenance of good physical and mental health in the communities served by the districts.'</p> <p>(Source: <a href="https://www.chcf.org/wp-content/uploads/2017/12/PDF-CaliforniaHealthCareDistricts.pdf">https://www.chcf.org/wp-content/uploads/2017/12/PDF-CaliforniaHealthCareDistricts.pdf</a>)</p> <p>Section 32121, item J, also includes the following: To establish, maintain, and operate, or provide assistance in the operation of, one or more health facilities or health services, including, but not limited to, outpatient programs, services, and facilities; retirement programs, services, and facilities; chemical dependency programs, services, and facilities; or other health care programs, services, and facilities and activities at any location within or without the district for the benefit of the district and the people served by the district. "Health facilities," as used in this subdivision, may also include those facilities defined in subdivision (d) of Section 15432 of the Government Code.</p> <p>(Source: <a href="https://www.achd.org/wp-content/uploads/sites/6/2015/12/ACHD-HCD-Code-12.15-FINAL.pdf">https://www.achd.org/wp-content/uploads/sites/6/2015/12/ACHD-HCD-Code-12.15-FINAL.pdf</a>)</p>



# MYTH vs FACT

## CONTINUED

MYTH	FACT
BCHD cannot be allowed to build on the perimeter of the site, maximizing the invasion of privacy, mass and visual impacts... BCHD cannot be allowed to build a nearly 800,000 sqft development that is larger than all of the Beryl Heights homes combined." (copied and pasted by multiple residents at the urging of a "community group.")	Section 32121 of the Health and Safety Code provides Special Districts the power "to do any and all things that are necessary for, and to the advantage of" any type of health promoting service or health care facility. In short, the law generally allowed for anything that is "necessary for the maintenance of good physical and mental health in the communities served by the districts." (Source: <a href="https://www.chcf.org/wp-content/uploads/2017/12/PDF-CaliforniaHealthCareDistricts.pdf">https://www.chcf.org/wp-content/uploads/2017/12/PDF-CaliforniaHealthCareDistricts.pdf</a> )
BCHD is selecting a "DEVELOPER /OWNER/ OPERATOR" (BCHD board meeting quote) that will be the owner (and developer/ operator). BCHD has not indicated that it will have any ownership." (M. Nelson email to Mayors, City Councils and Planning Commissions of Redondo Beach and Torrance, June 29, 2022)	Just like other lessees that do business with BCHD, the selected lessee(s) for the Healthy Living Campus project will develop the land, own the business and operate the business. BCHD will retain ownership of the land and will continue to have significant control over the use and operation of the property. At the conclusion/termination of the lease, the property - including the building - will be retained by BCHD.

Beach Cities Health District, one of the leading preventive health agencies in the nation, is working with the community to reimagine our aging, former hospital site to better reflect our mission and meet the current health needs of Hermosa Beach, Manhattan Beach and Redondo Beach residents. In pursuit of this vision, since May 2017 we've collected feedback from the community, consulted with experts and publicly vetted numerous designs and concepts for the 11-acre site with our board of directors.

This once-in-a-generation project is our community's unique opportunity to chart the future of health in the Beach Cities by purposefully building a vibrant campus where people of all ages can engage in healthy behaviors, form meaningful connections and be well ... for many years to come.

**From:** Mark Nelson (Home Gmail)  
**To:** info@lalafco.org; Holly Mitchell@bos.lacounty.gov; Paul Novak  
**Cc:** Ben.Allen@sen.ca.gov; Al.Muratsuchi@asm.ca.gov; CityClerk; Kevin Cody; Lisa Jacobs; CityClerk  
**Subject:** Public Comment - LALAFCO Board Members and Alternates  
**Date:** Saturday, July 23, 2022 7:42:26 PM  
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Brown Act Non-Agenda Item Comment for LALAFCO Board and Alternates, RB and Torrance Councils and Planning Commissioners:

BCHD released a report after close of business on July 22 2022 regarding their proposed Healthy Living Campus project. The project will be 100% third-party Developer/Operator/Owner and BCHD will only lease land to the D/O/O. 75% of D/O/Os bidding withdrew, citing poor economics of the project and a poor design by BCHD. BCHD has never developed a project and it should be no surprise that they spent \$10M of taxpayer funds on a poor and non-functional design. BCHD will only receive about \$500,000 annually in rents from 3 acres of land after BCHD leases back space in the building.

**The report clearly demonstrates that BCHD is not a viable enterprise whether or not it obtains the required Redondo Beach conditional use permit, planning commission design review and residential design guideline compliance. BCHD's report from investment bankers Cain/KeyBanc shows only a \$500,000 net annual payment for encumbering 33% of the site for 50-99 years and is insufficient to meet BCHD's CEO and Board's expenditure appetite.**

A \$500,000 annual rent does not replace the unnecessary demolition of the 514 Hospital, a building that Youssef Assoc. engineers states has 25 years of continued use without seismic retrofit under all existing best practices and ordinances.

## LA RETROFIT ORDINANCE (CONT'D)

### Compliance Timeline

- 3 years – Submit checklist to determine if building is subject to ordinance
- 10 years – Submit detailed evaluation
  - Comply w/ordinance requirements
  - Plans for seismic upgrade to comply w/ordinance
  - Plans for demolition
- 25 years – Complete all retrofit or demolition work

Ordinance represents "Best Practice"

City of Redondo Beach has not adopted ordinance, yet

Any seismic retrofit work for BCHD towers considered voluntary at this time



**BCHD will be only a real estate manager, as it currently is with other properties.**

### Change in Transaction Structure

- Concurrently, during late summer and Fall 2021, District Management, in coordination with its Consultants and with the approval of the Board, as well as the Finance and Property Committees, explored changing the transaction structure for the RCFE development from a JV (*in the form of Limited Partnership (LP)*) to a Land Lease. The latter will enable the District to achieve its objectives with less project risk, and is an attractive structure to developers

**Nine of the 12 bidders (75%) withdrew, citing the poor economics and poor planning/design of BCHD's proposal.**

## RCFE RFQ & RFP Process

Reasons Cited by Bidders to Withdraw from RFP Process

Reasons for Withdrawal	No. of Times Cited by Bidders
<b>Financial Feasibility</b> <ul style="list-style-type: none"> <li>• <i>Prevailing Wage Requirements</i></li> <li>• <i>High Pre-Dev. &amp; Construction Costs</i></li> <li>• <i>Non-RCFE Space</i></li> <li>• <i>Construction bonding requirement</i></li> </ul>	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/>
<b>RCFE Building Design</b> <ul style="list-style-type: none"> <li>• <i>Entrance Location &amp; Hallway Length – not resident friendly</i></li> <li>• <i>Impact of 514 Building Demo.</i></li> <li>• <i>Rooftop / Open Space vs resident security</i></li> <li>• <i>Unit Mix (lack of IL)</i></li> <li>• <i>Parking</i></li> <li>• <i>EIR Design Team</i></li> </ul>	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/>

The Approximate Rent from Any of the 3 Remaining D/O/O's will be ~\$1.5M annual to BCHD

Land Lease	PMB Watermark	RhodesMoore Frontier	SRG
Payment Methodology	Land Value X Lease Rate = Lease Payment	Base Rate at \$1.5 million + Negotiated Rate for Pre-Development Cost Reimbursement Based on a 15 Year Amortization	Fair Market Value X 3.5% (Cap of 120% of immediately prior year lease payment)
Land Value	\$25,000,000	[\$30,000,000]	\$38,000,000
Lease Rate	6%	[5%]	3.5%
Lease Payment	\$1,500,000	\$1,500,000 (\$10 / month until stabilization)	\$1,000,000; first 2 years after COP \$1,350,000; next 3 years NOTE: Rent Cap of 10% of NOI

BCHD Will Have to Pay the D/O/O Rent of about \$1M Annually

Fee				
Annual Lease Rate	PACE	\$392,165	\$535,899	\$572,012
	Youth Wellness	\$254,853	\$351,468	\$371,808
	Community Service	\$175,651	\$120,120	\$256,180
	Total	\$822,669	\$1,007,487	\$1,200,000

**From:** [Stop BCHD](#)  
**To:** [CityClerk](#)  
**Cc:** [Sheila Lamb](#); [scottbehrendt@yahoo.com](mailto:scottbehrendt@yahoo.com); [ghazeltine@verizon.net](mailto:ghazeltine@verizon.net); [dougboswell@gmail.com](mailto:dougboswell@gmail.com); [rob.gaddis@gmail.com](mailto:rob.gaddis@gmail.com)  
**Subject:** Public Comment Non-Agenda Planning Commissioners  
**Date:** Tuesday, July 26, 2022 7:01:13 PM  
**Attachments:** [Comments of StopBCHD to LALAFCO regarding BCHD MSR Draft.pdf](#)

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

Attached are the comments to StopBCHD.com to LALAFCO regarding the BCHD MSR. Please forward to any missing commissioners on the cc list.

StopBCHD.com will be making further comments to the LALAFCO Board and Board of Supervisors following release of the final document.

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

## **Comments to LALAFCO Draft BCHD MSR**

### **BCHD's HLC is in Violation of the Enabling Legislation for Healthcare Districts**

California Code requires BCHD to provide services for the benefit of residents, not a supermajority of non-residents or the general public at large. BCHD's development of facilities to serve 80-96% non residents provides residents with only de minimis use and creates "negative benefits."

### **Unlike SBHD that Built Owned and Operated SBH for Incidental and Hill-Burton Use of Non-Residents, BCHD is building a Development for the Incidental Use of District Residents**

BCHD is deliberately allowing a private Developer/Owner/Operator to build facilities for 80-96% non-residents of the District, leaving only 4-20% incidental resident use.

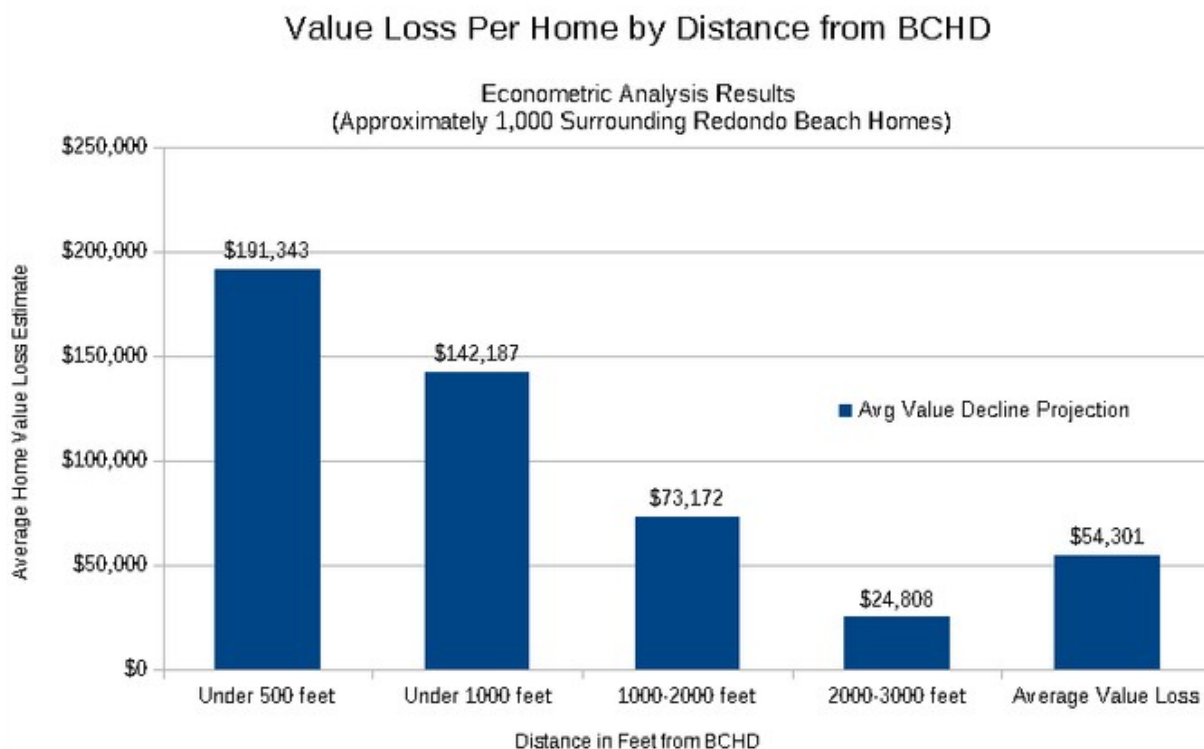
**BCHD is actively seeking 3<sup>rd</sup> party Developer/Owner/Operators to develop commercial business for 80-96% beneficial use of non-residents of the District:** Limitation on (i) To do any and all things that an individual might do that are necessary for, and to the advantage of, a health care facility and a nurses' training school, or a child care facility **for the benefit of** employees of the health care facility or **residents of the district**. (Cal. Health & Saf. Code § 32121) BCHD is operating for the incidental use of residents, not their benefit.

**BCHD HLC requires developing facilities for 80-96% non-residents of the District:** (j) To establish, maintain, and operate, or provide assistance in the operation of, one or more health facilities or health services, including, but not limited to, outpatient programs, services, and facilities; retirement programs, services, and facilities; chemical dependency programs, services, and facilities; or other health care programs, services, and facilities and activities at any location within or without the district **for the benefit of the district and the people served by the district**. (Cal. Health & Saf. Code § 32121) BCHD is developing for primary benefit of non-residents.

### **BCHD, Its Site and Buildings, have been a Significant Dis-benefit to Surrounding Property Values and District Residents**

Properties surrounding BCHD in Redondo Beach are collectively worth \$50M less than they otherwise would be according to econometric modeling of home values using home characteristics and distance from the former South Bay Hospital site. The Redondo Beach homes either pre-existed the development of the site entirely, or, they were built prior to the Hospital expansion from 100,000 to 150,000 sqft. The site buildings are currently 312,000 sqft and BCHD is proposing nearly 800,000 sqft. Any benefits provided by BCHD programs (benefits that BCHD does not rigorously or quantitatively evaluate due to mission conflict and lack of abilities) must be netted by the damages incurred by the District residents.

BCHD acknowledges that it damages surrounding neighborhoods, yet, refuses to downsize the buildings or even evaluate their damages.



BCHD wrongly equates its damages to a local Vons store or a fire station, both of which serve the local neighborhood. In the case of BCHD, the HLC will serve 90-98% non-residents of Redondo Beach, while Redondo Beach receives 100% of the dis-benefits. Further, BCHD denies the decades of neighborhood complaints about noise, traffic, excess nighttime lighting and parking. Parking eventually led to “Resident Only” restrictions for blocks around the compound when South Bay Hospital District refused to deal with the causes of neighborhood disruption. Clearly this is attempted BCHD PR spin, however BCHD clearly identifies its damages, however it attempts unsuccessfully to “blame the victims.” The record shows that the majority of Beryl Heights neighborhood was built out in the early 1950s prior to the hospital. Further, all of Beryl Heights was built out prior to the expansion of the hospital in 1967 or the construction of the two rental commercial office buildings on the site.

▼ HAS BCHD CAUSED DAMAGE TO THE SURROUNDING NEIGHBORHOODS?

BCHD has not denied there are effects on neighbors from our operations, similar to other organizations, schools or businesses located near residences.

Further, the draft Environmental Impact Report currently being prepared will assess and analyze any impacts associated with the proposed Healthy Living Campus upgrade.

Since BCHD's Campus opened in 1960, neighbors were certainly aware the campus was nearby before they moved in, especially if they lived adjacent or across the street and could see campus activity. The South Bay Hospital was operating through 1998 in addition to medical office space on the campus at 510 and 520 buildings -- yet neighbors still made the decision to accept the normal activities of a functioning hospital across the street from or near their property. Only now has this become an issue.

BCHD also refuses to evaluate its damages – a clear sign it is attempting to cover them up.

Subject: RE: CPRA - Surrounding property values

Please see below for the District's response (in red) to your public records request received 9/29/21 that reads:

Provide all studies demonstrating the impact of the current BCHD on surrounding property values. No documents responsive.

Provide all studies demonstrating the impact of the proposed BCHD self-certified project on surrounding property values. No documents responsive.

**Any Claims of Program Benefits by BCHD are Unfounded and Must be Discarded.**

Per BCHD's own statements, it is neither required nor capable of evaluating the benefits or net benefits of its health programs. BCHD commonly makes claims of program benefits. However, when probed in California Public Record Act (CPRA), requests the public has found that BCHD claims it has no responsibility or capability to assess the public health benefits of its programs.

From the CPRA response of BCHD: "The Districts [SIC] is currently preparing the FY22-23 Budget for next fiscal year and will also be update applicable performance, benefits and cost metrics. Please note that the District has previously explained that calculating a dollar community benefit for each program is beyond the scope of the District's mission, financial resources and abilities." April 2022

BCHD clearly states under CPRA questioning that computing community benefits for its programs is beyond its "mission" and "abilities." Therefore, no individual BCHD program, such as PACE, RCFE, "allcove", LiveWell, etc. can be considered a benefit (more importantly a NET benefit beyond the program's costs and damages) because BCHD does not have the "abilities" for evaluation. It is ludicrous to assume that a program can provide gross benefits and net damages and be assumed to meet the requirement of being a benefit to district residents.

**From District Inception in 1993, BCHD has Failed to Budget or Assess Program Costs**

From a BCHD CPRA response, BCHD acknowledged from inception through current, it has not budgeted nor conducted cost accounting of its programs. Thus, it has no foundation to assert any program is beneficial.

“2. Provide the 2018-19 budget for each of the 40 programs **No documents responsive; the District is working on setting up a system**” August 2020

“5. Provide all cost-benefit analysis and ratios of the aforementioned 40 programs. **No documents responsive**” August 2020

**The Results of BCHD’s “Priority Based Budgeting” Process are Invalid and Must Be Discarded.**

BCHD’s selected budgeting system of Priority Based Budgeting (PBB) is a popularity contest dominated by the Board, Executives, Staff, Board-approved Committee Members and affiliated volunteers. Less than 10% of PBB Voters are the Unaffiliated Public. Furthermore, it is wholly unethical for BCHD Board, CEO and executives to expect staff to oppose them openly, by name, in public. Below is an example of attendance at a BCHD meeting. Other meetings had even fewer unaffiliated public attempting to voice their concerns as they were clearly outvoted.

Affiliated			61	92.40%	96.60%
Unaffiliated Public			5	7.60%	3.40%

Corrected Affiliation	Average Participant Minutes	Total Participant Minutes	Count	% Participants	% Time Participation
Committee	102.1	715	7	10.60%	6.40%
Community Partner	169.8	679	4	6.10%	6.10%
Consultant	202	404	2	3.00%	3.60%
Former Committee	138	276	2	3.00%	2.50%
Media	147	294	2	3.00%	2.60%
Political Supporter	10	10	1	1.50%	0.10%
Staff	192.1	6917	36	54.50%	61.90%
Volunteer	213.7	1496	7	10.60%	13.40%
Unaffiliated Public	76	380	5	7.60%	3.40%
Total	1250.7	11171	66		
Affiliated			61	92.40%	96.60%
Unaffiliated Public			5	7.60%	3.40%

**Instead of Relying the Public Health Value of Programs, BCHD Conducts Popularity Contests with the Public**

BCHD conducts open, non-selective, non-statistically valid surveys of the public to assess health needs. These needs are not subjected to any rigorous analysis to determine if public funding is warranted. BCHD even gives PRIZES for the PR motivated process.



BCHD has developed a new community and individual-level questionnaire to capture additional zip code-specific information along with the unique perspective of healthcare providers and community stakeholders. This information will be used to compile the 2022-2025 Community Health Report and guide the selection of BCHD's Health Priorities.

Please complete the following survey. Your opinions are greatly valued! When you have completed the survey, you will have the option to enter an opportunity drawing for a chance to win two tickets to the BeachLife Festival or gift cards to Blue Zones Project Approved restaurants. Winners will be selected after the survey closes and notified by Friday, September 3.

**BCHD's Community Health Committee Conducts Non-scientific, Non-Statistically Valid Surveys as Well and It Cannot Validly Assess Program Benefits**

## Community Health Survey

- August 2, 2021 and August 30, 2021 via Survey Monkey
- promoted through BCHD's communication channels, through the cities' newsletter and social media updates, and promoted by elected officials, Chambers of Commerce, and community organizations

### **The SOI Appears Non-Applicable to the Health District and Must be Evaluated**

The BCHD owns seven (7) properties in Redondo Beach (2114 Artesia Boulevard; 1272 Beryl Street; 601 So. Pacific Coast Highway; 510, 512, 514, and 520 No. Prospect Avenue); and one property each in Hermosa Beach (1837 Pacific Coast Highway) and Manhattan Beach (1701 Marine Avenue).<sup>18</sup> These various properties are developed with multiple health-related uses, such as the Beach Cities Health Center; the Center for Health and Fitness (a fitness center with

The jurisdictional boundary of the BCHD includes the cities of Hermosa Beach, Manhattan Beach, and Redondo Beach. In addition to those three (3) cities, the SOI includes the cities of El Segundo, Gardena, Hawthorne, Lawndale, Palos Verdes Estates, Rancho Palos Verdes, Rolling Hills, and Rolling Hills Estates, as well as several unincorporated communities (Del Aire, West Alondra Park, Westfield, and others). The jurisdictional and SOI boundaries of the BCHD are shown as Exhibit 5 on Page 33.

The BCHD Sphere of Influence appears to be an artifact of hospital service and not of health district service. Hospital service, especially Hill Burton Act service, is a mandatory, emergency public service, while health districts provide elective, non-emergency, preventative services. As a result, BCHD's SOI appears inapplicable and a full analysis needs to be completed, along with widespread public dissemination. Other areas are capable of developing their own special districts if they wish, or requesting annexation. The automatic expansion of the area to contiguous political units is unneeded and unsubstantiated.

Provide the 2008 update and every 5 year update as required by law as attachments or inline text. Optional health districts should not automatically be granted the SOI of a Hill-Burton hospital.

Also provide any applications, memos or other SBHD or BCHD correspondence that is used in SOI determinations as attachment or in-line text.

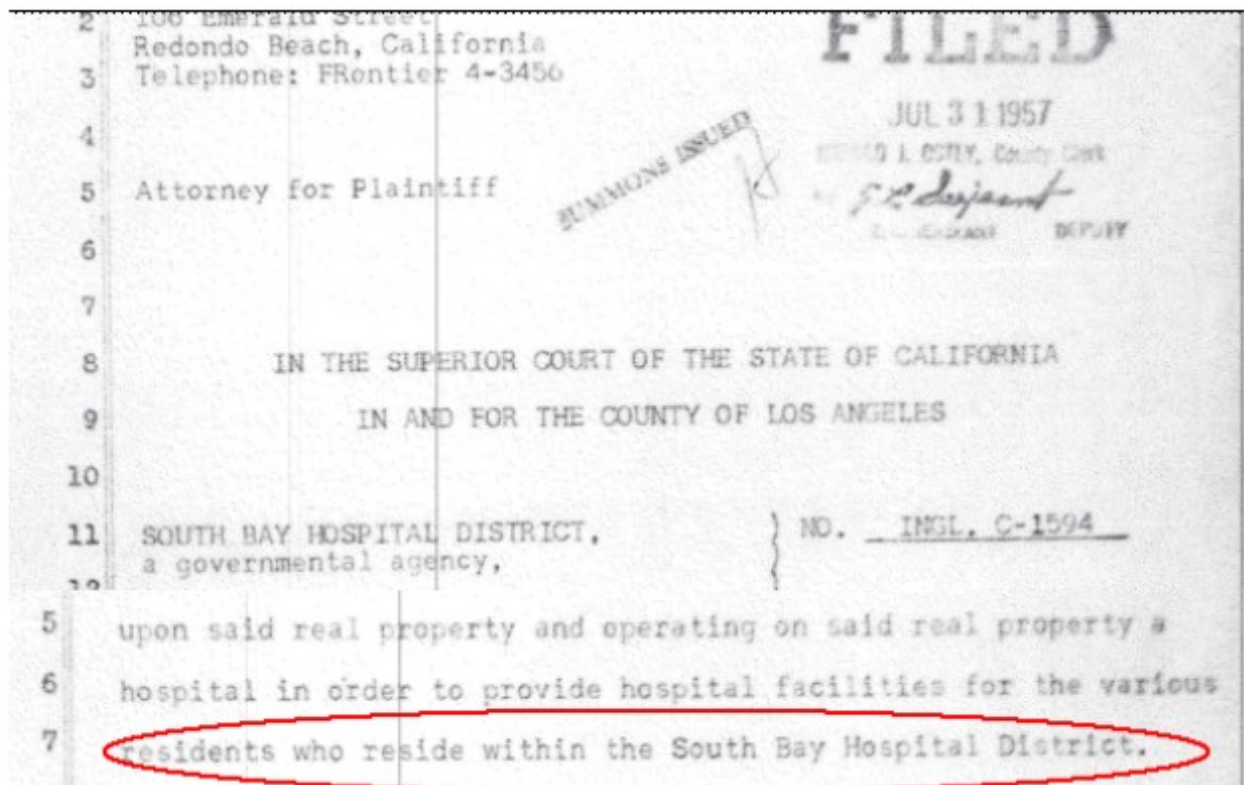
Cal. Gov. Code § 56425

(g) **On or before January 1, 2008, and every five years thereafter**, the commission shall, as necessary, review and update each sphere of influence.

(h) In determining a sphere of influence, the commission may assess the feasibility of governmental reorganization of particular agencies and recommend reorganization of those agencies when reorganization is found to be feasible and if reorganization will further the goals of orderly development and efficient and affordable service delivery. **The commission shall make all reasonable efforts to ensure wide public dissemination of the recommendations.**

(i) When adopting, amending, or updating a sphere of influence for a special district, the **commission shall establish the nature, location, and extent of any functions or classes of services provided by existing districts.** (emphasis *added*)

### **The District was Formed for the Benefit of It's Residents – BCHD is Ignoring that Legal Action by Its Board**



**A Supermajority of BCHD Services During Covid Were for Non-Residents/Non-Taxpayers of the District**

Although BCHD failed to track Covid testing by city, by zip code, or by residency, the County of Los Angeles Department of Public Health did conduct such accounting. In a California Public Records Act (CPRA) response, BCHD disclosed that LACDPH records showed that 84% Covid tests administered by BCHD were for non-resident/non-taxpayers of the District. BCHD conducted over 150,000 tests and BCHD exposed taxpayers to significant potential losses of taxpayer funding and assets. It appears that BCHD cost recovery is still over \$2M short of supermajority non-resident costs incurred for Covid, and that taxpayers have lost \$2M in services due to BCHDs CEO and Board's poor judgment.

**A Supermajority of BCHD Services with the Healthy Living Campus will be for non-taxpayer/non-residents using publicly owned and zoned land.**

According to BCHD press releases, marketing studies and trade association data, BCHD plans to have 80% non-resident tenants in the RCFE, 91% non-residents served in the "allcove" program and 96% non-resident enrollees in the PACE program. Notwithstanding the roughly \$2M in lease fees that BCHD will receive, 100% of the damages from these three programs will accrue in 90277 Redondo Beach and all of the District residents will only reap approximately 10% gross

benefit and after adjusting for damages and costs, District residents will clearly have negative net benefits (aka losses) from BCHD's activity.

### **Summary of BCHDs Supermajority of Services Outside the Residents of the Beach Cities**

LOCATIONS SERVED BY BCHD PROGRAM	POPULATION	POPULATION FRACTION	ALLCOVE	SAFE IN THE SOUTH BAY	RCFE	PACE	COVID TESTS	AVERAGE BCHD PROGRAM ACTIVITY
Source	US Census	Computed	BCHD Press Releases	BCHD Press Releases	BCHD MDS Consultant Report	NPAOnline statistics	LACDPH	Computed
<b>Non-Resident Share</b>		<b>91.3%</b>	<b>91.3%</b>	<b>63.6%</b>	<b>80.6%</b>	<b>95.7%</b>	<b>84.0%</b>	<b>83.1%</b>
<b>BCHD Resident Share</b>		<b>8.7%</b>	<b>8.7%</b>	<b>36.4%</b>	<b>19.4%</b>	<b>4.3%</b>	<b>16.0%</b>	<b>16.9%</b>
Athens	9,000	0.6%	0.6%	0.0%	0.0%			
Avalon	3,700	0.3%	0.3%	0.0%	0.0%			
Carson	90,000	6.4%	6.4%	0.0%	0.0%			
Catalina Island	300	0.0%	0.0%	0.0%	0.0%			
El Segundo	17,000	1.2%	1.2%	5.1%	2.9%			
Gardena	60,000	4.3%	4.3%	0.0%	0.0%			
Harbor City	25,000	1.8%	1.8%	0.0%	0.0%			
Hawthorne	87,000	6.2%	6.2%	0.0%	0.0%			
Inglewood	110,000	7.8%	7.8%	0.0%	0.0%			
Lawndale	33,000	2.3%	2.3%	0.0%	0.5%			
Lennox	22,000	1.6%	1.6%	0.0%	0.0%			
Long Beach	467,000	33.1%	33.1%	0.0%	0.0%			
Hermosa	19,000	1.3%	1.3%	5.7%	2.9%	0.7%		
Manhattan	36,000	2.6%	2.6%	10.7%	8.4%	1.3%		
PVE	13,000	0.9%	0.9%	0.0%	10.6%			
Rancho Dominguez	15,000	1.1%	1.1%	0.0%	0.0%			
RPV	42,000	3.0%	3.0%	12.5%	19.5%			
Redondo Beach	67,000	4.8%	4.8%	20.0%	8.1%	2.4%		8.0%
Rolling Hills	1,500	0.1%	0.1%	0.4%	1.2%			
RHE	8,000	0.6%	0.6%	2.4%	6.5%			
San Pedro	86,000	6.1%	6.1%	0.0%	0.0%			
Torrance	145,000	10.3%	10.3%	43.2%	10.1%			
Wilmington	53,000	3.8%	3.8%	0.0%	0.0%			
Beyond Listed Cities		0.0%	0.0%	0.0%	30.0%			
Total Population	1,409,500							
BCHD Cities	122,000							
BCHD Residents as Fraction Total Population or Benefits		8.7%	8.7%	36.4%	19.4%	4.3%	16.0%	16.9%
1) BCHD kept no records of testing city of residence, LACDPH offered total fraction data of BCHD vs Non-Residents 2) MDS report states 30% of RCFE tenants will be from outside listed zipcodes 3) Palos Verdes Peninsula Cities disaggregated by population shares 4) RCFE data based on BCHD MDS Consultant report 5) Covid testing based on LA County Dept of Public Health after BCHD responded that it was not tracking resident vs non-resident 6) PACE is based on National PACE Association data of 1 in 1,000 seniors utilizing PACE. BCHD is proposing a 400 enrollee program with 17 residents								

### **Redondo Beach Will Bear 100% of the Non-resident/Non-taxpayer Dis-benefits with Only 8% of the Benefits. Redondo Beach Has and Will Suffer NET DAMAGES from BCHD Programs**

RPV	42,000	3.0%	3.0%	12.5%	19.5%			
Redondo Beach	67,000	4.8%	4.8%	20.0%	8.1%	2.4%		8.0%

### **BCHD is Utilizing Non-Activated Powers**

The BCHD owns seven (7) properties in Redondo Beach (2114 Artesia Boulevard; 1272 Beryl Street; 601 So. Pacific Coast Highway; 510, 512, 514, and 520 No. Prospect Avenue); and one property each in Hermosa Beach (1837 Pacific Coast Highway) and Manhattan Beach (1701 Marine Avenue).<sup>18</sup> These various properties are developed with multiple health-related uses, such as the Beach Cities Health Center; the Center for Health and Fitness (a fitness center with exercise equipment that offers personal training, small group training, and exercise classes for the general public, and exercise classes tailored to senior citizens); Adventure Plex (an indoor recreation and exercise facility for young children); as well as lessees that provide urgent care, radiological services, and Alzheimer residential care. Amongst other programs, BCHD offers the following services:

- Children: exercise programs, obesity prevention education, mental health awareness, school-based gardens, and volunteer-assisted walk-to-school programs;
- Middle-School and High School Students: mental health collaboration and wellness councils, substance abuse prevention;
- Senior citizens and persons with disabilities: care management (companionship, errand assistance, in-home exercise, limited transportation assistance, and on-line volunteer support.
- Mental health programs;
- Substance abuse prevention;
- Parenting education; and
- Blue Zones Project: programs which promote healthy exercise, eating, and shopping<sup>19</sup>

The powers that BCHD appears to be declaring to be in use in the narrative are different than those of a hospital and associated buildings that were voter and Court approved at initiation of SBHD. Furthermore, BCHD has submitted no applications to LALAFCO to activate any of these powers. BCHD should NOT be rewarded for failing to comply with the law by grandfathering these powers. Instead, LALAFCO should enforce the law, and require BCHD to provide formal applications with net benefits analyses to demonstrate that these services should not be provided by the public sector and require taxpayer subsidy. For example, health clubs, childcare, and real estate rental are dominated by free market activity, as is assisted living, PACE, and mental health care.

As stated in *South San Joaquin v. the Superior Court*  
162 Cal.App.4th 146 (Cal. Ct. App. 2008)

In *Irrigation Dist.*, supra, 162 Cal.App.4th 146, this Court held that **Irrigation could not circumvent the requirement to obtain approval from Formation** before expanding its service to provide retail electric service.

**In June [2008], Assembly Bill No. 948 was amended in the Senate. This amendment added Article 1.5, entitled "New or Different Services" and deleted Article 3.5. An analysis by the**

Senate Local Government Committee explained current law allowed LAFCO's to adopt regulations to control services of special districts. "Assembly Bill 948 repeals the current provisions relating to LAFCOs' regulations controlling special districts' latent powers. Instead, *[Assembly Bill No.] 948 creates a new set of procedures that allow a special district to apply to a LAFCO for permission* to exercise new or different functions or services." (Sen. Com. on Local Gov., Analysis of Assem. Bill No. 948 (2001-2002 Reg. Sess.) as amended June 13, 2001, p. 2.)

Based on Public Record Act requests, neither BCHD nor its predecessor has complied with the law in effect at the time. Bluezones is clearly post-AB 948 and required an application, as did LiveWell in general and LiveWell Kids which are both post 2008 as well.

All of BCHD's current services must be reviewed and compared to their requests for activation. If no requests exist, BCHD is in violation of the law and all services require demonstration of net value to District residents.

### **BCHD and LALAFCO Misrepresent Material Facts of the Proposed HLC**

BCHD has proposed a Healthy Living Campus Project, which entails a complete redevelopment of the district's main campus in Redondo Beach. The project includes the removal of the former hospital building (514 building), which, according to District representatives, is in need of a costly and significant seismic upgrade were it to be maintained; and development of new facilities: a 417-unit residential care facility for the elderly (RCFE), BCHD programs and services (care management for seniors and persons with disabilities), youth wellness center, active open space, an aquatics center, a health and fitness center, a community wellness pavilion with space for community meetings and events, and parking. The BCHD Board of Directors approved and certified an Environmental Impact Report (EIR) on September 8, 2021. BCHD representatives submitted a pre-application for Master Plan, Conditional Use Permit (CUP), and Design Review applications to the City of Redondo Beach on February 22, 2022.<sup>20</sup> City representatives provided comments to BCHD; city staff further indicated that BCHD representatives are working to address these comments and submit the application to the City of Redondo Beach.<sup>21</sup>

significantly every year. Based upon reports from qualified engineers, BCHD representatives have stated publicly that the existing hospital is in need of a costly seismic upgrade. The district

FALSE: "is in need of a costly and significant seismic upgrade" and "is in need of a costly seismic upgrade"

BCHD's consultant, Youssef & Associates presented the following to a committee of BCHD where his firm's official position is that no RBMC requires retrofit, best practice does not require retrofit, and best practice allows up to 25 years to complete retrofit, if required. BCHD's CEO Bakaly told member Mark Nelson in a public meeting that the Board "wanted" to replace the building, notwithstanding that there was no requirement to do so.

FALSE: “417-unit residential care facility”

The facility is 220-units

**Work Product of Youssef Assoc. for BCHD Reveal No Current Best Practice Need for Seismic Retrofit on 514 N Prospect Ave Building – Any Work is VOLUNTARY**

## **LA RETROFIT ORDINANCE (CONT'D)**

### Compliance Timeline

- 3 years – Submit checklist to determine if building is subject to ordinance
- 10 years – Submit detailed evaluation
  - Comply w/ordinance requirements
  - Plans for seismic upgrade to comply w/ordinance
  - Plans for demolition
- 25 years – Complete all retrofit or demolition work

Ordinance represents “Best Practice”

City of Redondo Beach has not adopted ordinance, yet

Any seismic retrofit work for BCHD towers considered voluntary at this time



### **LALAFCO Appears in Non-compliance with Cal. Gov. Code § 56425**

Because LAFCO did not identify active powers for the BCHD when LAFCO added special district representatives, nor when it adopted the Miscellaneous Government Services MSR and SOI Update in 2004, this MSR will identify those active powers which the BCHD is currently providing. All other services are considered to be latent powers; LAFCO approval (pursuant to Government Code Section 56824.10) would be required before the district could provide any new or different functions or classes of services.

It appears that LALAFCO has not identified active powers nor updated SOI as required. There is no reason that the voters, taxpayers and residents of the District should suffer from LALAFCOs

apparently failure that allowed expansion of BCHD in violation of State Law. Services must be evaluated de novo.

### **BCHD and LALAFCO Failed to Evaluate District Dissolution as an Option**

#### **Present and Planned Capacity of Public Facilities**

As district representatives publicly concede, the BCHD is at a turning point. The costs of maintenance, upkeep, and improvements on the existing former hospital building are escalating significantly every year. Based upon reports from qualified engineers, BCHD representatives have stated publicly that the existing hospital is in need of a costly seismic upgrade. The district is, therefore, faced with a choice: one, expend significant additional resources to improve the existing building; or two, demolish and replace the existing hospital building. Based upon the recommendations of its staff and outside consultants, the BCHD Board of Directors has decided to move forward with the second option, in the form of the proposed Healthy Living Campus described previously.

In this regard, it is fair to conclude that the present capacity of the existing public facilities on the main campus *is not* ideal for future utilization of the property. Whether or not the planned facilities will be ideal depends, almost entirely, on whether the Health Living Campus is approved by the City of Redondo Beach, and ultimately constructed by BCHD, or not; in that regard, it is not easy to answer the question, given that the outcome of the project is unknown.

There are NOT only two choices, retrofit or demolish. BCHDs own contract engineering firm, Youssef Assoc. presented that there is no requirement for any seismic work and that the building has a 25 year remaining seismic life under best practices. BCHD intentionally misstates the record and LALAFCO is now fully aware of that misstatement.

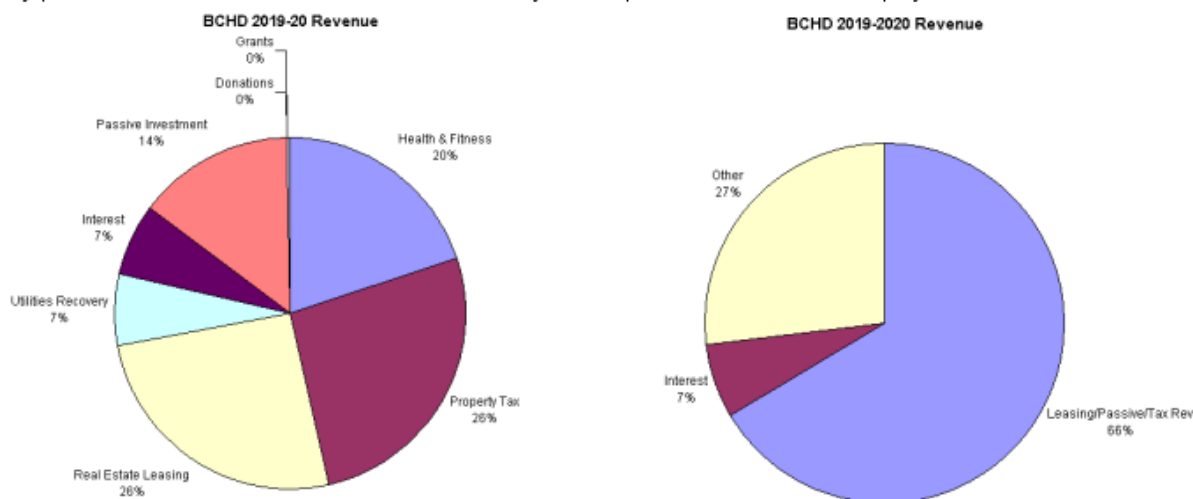
Further, BCHD is primarily a real estate manager of taxpayer owned property and a passive investor in financial instruments. It operates its Health and Fitness at a significant loss, subsidizing residents of other cities who are non-taxpayers. The charts below demonstrate how BCHD revenues are in SUPERMAJORITY from passive investments and real estate management revenues. BCHD revenues from any direct involvement in health activities are de minimis.



## **As a Supermajority Real Estate Manager and Passive Investor – BCHD Should be Referred to a Civil Grand Jury for Dissolution**

It is empirically indisputable that BCHD is primarily a real estate management entity and passive investor in commercial projects. Neither function requires a Special District. Commercial RCFE such as Sunrise and the BCHD proposed \$12,500/month commercial RCFE and PACE exist in the absence of BCHD or public investment. Only 20% of the RCFE and only 4% of the PACE will directly serve District residents.

Therefore, both are merely passive investments of low value to the District residents and can easily be fulfilled by the market. In fact, since BCHD refuses to consider a cost-based set of services, the market can likely provide these services more cost effectively and a passive investor of taxpayer funds and real estate.



According to Cain Bros., BCHD's \$2M contracted investment banker, BCHD's leasing of land for development of the 110-foot tall, 300,000 sqft RCFE will net BCHD approximately \$2.5M per year of approximately \$80M per year of revenue to the commercial third party Developer/Owner/Operator. Materially, all services will be provided at market rates by commercial firms, and therefore, BCHD is unneeded in the process.

BCHD currently has no license for RCFE or PACE and plays no public health role in Sunrise Hermosa Beach. BCHD is a passive investor, paying over \$2M annually to its top ten executives – an amount equal to 50% of property tax revenues. In the event of dissolution, all commercial entities continue operating and the property taxes could be reassigned to local needs, thereby removing BCHD's 60% overall employee overhead.

### **BCHD's Commercial Development is Contested by Residents**

The decision to move forward with the Health Living Campus proposal is not without its critics, evidenced by the substantial public input on the matter provided to LAFCO. It is important to note, however, that the land-use issues—environmental impacts, General Plan and zoning requirements, neighborhood compatibility, and related matters—are entirely within the jurisdiction of the City of Redondo Beach, which has land-use authority over the BCHD campus.

The excerpt speaks for itself and fully explains why local quality of life groups focus on the Cities and provide no additional discussion with BCHD.

### **LALAFCO's Determination is Incorrect and Unsupported**

- It is clear that the BCHD Board of Directors must either expend significant additional resources to improve the existing hospital building, or to demolish and replace it.

The statement is FALSE. BCHD has 25 years of continued use in the 514 Building as demonstrated with factual evidence by BCHD's structural engineering firm. There is no urgent seismic issue as BCHD falsely claims. Furthermore, BCHD can be dissolved or downsized. There is NO REQUIREMENT to continue operations at the current level. As BCHD has replied in Public Records Acts, it asserts that it does not have the ability to conduct Benefit-to-Cost analysis and does not know if it is overall a public health benefit or liability as such. LALAFCO cannot make a determination without review of the facts, and BCHD has provided only biased information to LALAFCO.

### **BCHD's Assertion of being Compelled to Retrofit or Demolish is False**

- Should the Healthy Living Campus not move forward, the BCHD would very likely be compelled to revert to the "improvement" option.

This statement is FALSE. BCHD can operate the 514 building for 25 more years based on all applicable codes and standards. BCHD chooses to make the false declaration that it must revert. BCHD could also terminate or downsize. It provides no emergency services and the majority of its revenues are from commercial operation.

### **The Following Is Advertising of BCHD "Wins" in Paid Trade Associations**

The California Special District Association (CSDA) is a non-profit organization providing professional development, education, and advocacy on behalf of special districts. One of CSDA's programs is its Transparency Certificate of Excellence, which the CSDA awards to special districts which have documented implementation of a number of measures which promote transparency. On December 13, 2021, CSDA awarded Transparency Certificate of Excellence to the BCHD. Amongst other things, the certificate documents that the BCHD has met the following requirements:

Unless LALAFCO has audited the practices of CSDA, this statement is BCHD advertising and benefits received by BCHD in return for its membership dues. This must be removed.

**ACHD is a Self-declared Advocacy Organization**

As a paid trade association and advocate for its paid members, ACHD awards and recommendations are biased, tainted, and must be excluded from the MSR. Per their website, they have an Advocacy Team and provide advocacy services. On behalf of its members including BCHD, ACHD has opposed legislation supporting worker pay, accountability, and other measures that directly benefit consumers and those in health crisis in order to shield districts from accountability.

**All BCHD Promotion by LALAFCO of Paid Trade Association Awards Must be Removed from the MSR**

Unless LALAFCO has substantive knowledge of the processes, evaluations, and quality of the paid trade association awards, LALAFCO must remove said references from the MSR. Any awards from paid trade associations cannot be relied upon absent independent analysis of the association and processes that LALAFCO has not likely completed.

**CSMFO Awards are a Beauty Contest Judged by Other Members with Such Absurd Guidelines as “Does the Document Contain a Table of Contents and Are the Pages Numbered”**

**CSMFO MERITORIOUS AWARD SECTION  
Items Required For CSMFO Meritorious Award and Excellence Award  
For Capital Budgets Beginning July 1, 2017**

1. Is there a table of contents? Are the budget document's pages numbered?
2. Does the budget contain a transmittal letter or budget message?

Unless LALAFCO has direct knowledge of the processes and quality of the awards, ALL AWARDS not from State or Federal agencies must be removed from MSR. Paid trade associations and membership association awards are prizes for paid members, graded by paid members, and excluding all non-member organizations and government bodies.

**LALAFCO Contradicts Its Findings and Must Strike the First Sentence Below**

If LALAFCO asserts it cannot ascertain the accuracy of the facts of the statement in the second paragraph, then it has no reason to believe that BCHD has been diligent vs strategically denying and withholding information. The statement must be removed.

In LAFCO staff's opinion, the statistics provided by BCHD appear to reflect a diligent and concerted effort by BCHD representatives to reply to all public records requests.

Some members of the public nevertheless continue to email LAFCO, stating that the BCHD is not fully complying with all requests. Given the back-and-forth amongst these stakeholders and the BCHD, it is difficult, if not impossible, for LAFCO to ascertain the accuracy of the statements by all parties; further, the agency with jurisdiction to investigate Brown Act complaints is the Los Angeles County District Attorney. In staff's opinion, the complaints about the District's responsiveness to public records requests do not change an overall conclusion that the BCHD operates in a transparent manner.

**PACE Does NOT Provide Net Benefits to Residents or Employees**

	Program 115 Trust
32121 (i) To do any and all things that an individual might do that are necessary for, and to the advantage of, a health care facility and a nurses' training school, or a child care facility for the benefit of employees of the health care facility or residents of the district.	<ul style="list-style-type: none"> <li>• Leap &amp; Bound Child Development Center</li> <li>• UCLA Health</li> <li>• Venice Family Clinic (Federally Qualified Health Center)</li> <li>• allcove youth wellness center</li> <li>• PACE (Program for All-Inclusive Care for the Elderly)</li> <li>• Beach Cities Surgery Center</li> </ul>

96% of BCHD's proposed PACE will service non-resident/non-taxpayers according to National PACE Assoc statistics. Therefore, 100% of the damages will with certainty exceed the 4% of residents in the District that will use PACE. The statement by BCHD is unsupported and FALSE and must be removed due to the 25-to-1 damages to benefits.

**PACE and RCFE are Full Market Cost Programs and BCHD Involvement Provides No Benefit to District Residents – In Fact, BCHD's \$2M Executive Payroll is an Excessive Overhead that Would Not Ordinarily Impact PACE or RCFE Costs.**

32121 (j) To establish, maintain, and operate, or provide assistance in the operation of, one or more health facilities or health services including outpatient, retirement programs and other healthcare programs for the benefit of the people served by the district	<ul style="list-style-type: none"> <li>• Care Management</li> <li>• Enhanced Care Management</li> <li>• Assistance, Information and Referrals Hotline</li> <li>• Covered California Enrollment</li> <li>• Medically accredited exercise fitness facility</li> <li>• AdventurePlex—youth fitness facility</li> <li>• allcove: youth wellness center</li> <li>• RCFE: Sunrise Assisted Living (Assisted Living and Memory Care)</li> <li>• RCFE: Healthy Living Campus (Assisted Living and Memory Care)</li> <li>• Beach Cities Surgery Center</li> <li>• PACE (Program for All-Inclusive Care for the Elderly)</li> </ul>
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Both PACE and RCFE fail the definition since both are full market rate programs and participants face increased costs from BCHD's overheads. In any event, BCHD provides no material assistance beyond that of the free market for PACE or RCFE.

**“Allcove” Fails the Definition As BCHD Published that 91% of the Target Market are Non-Resident/Non-Taxpayers of the District and It Will NOT Provide Net Benefits**



Allcove is clearly a latent service that requires a cost-effectiveness and benefit case to operate. BCHD services only 9% residents with the program, and as such, it has no NET benefit and in fact a NET COST to the District residents. As with all BCHD programs, BCHD asserts that public health benefit assessment is beyond the “Mission” and “Abilities” of BCHD and its staff (per CPRA response) so any assertion by BCHD that a program is beneficial to District residents cannot be supported by BCHD data or analysis.

**BCHD's Claims in 32121 j) Are Supermajority False**

BCHD Falsely Claims that it established, maintains, operates, or provides assistance in the operation of 1) business that pay fair market rent in the BCHD 514 N Prospect Bldg, and 2) businesses in the 3<sup>rd</sup> party owned and operated 510 and 520 N Prospect Commercial Office Buildings. This is a false representation by BCHD to inflate its services and must be thoroughly vetted at the business by business level for BCHD ownership or other material operational assistance. Furthermore, BCHD's ownership of the underlying land provides no claim to a tenancy in the Commercial Office Buildings, as they are owned and operated by 3<sup>rd</sup> parties.

Both sampled tenants and the building rental manager confirm that the Commercial Office Buildings have no BCHD relationship with tenants.

In addition, BCHD list prospective, non-operating services, such as “allcove” for 91% non-residents, RCFE for 80% non-residents, and PACE for 96% non-residents as active services. That is flatly false.

<p>32121 (j) To establish, maintain, and operate, or provide assistance in the operation of, one or more health facilities or health services including outpatient, retirement programs and other healthcare programs for the benefit of the people served by the district</p>	<ul style="list-style-type: none"> <li>• Care Management</li> <li>• Enhanced Care Management</li> <li>• Assistance, Information and Referrals Hotline</li> <li>• Covered California Enrollment</li> <li>• Medically accredited exercise fitness facility</li> <li>• AdventurePlex—youth fitness facility</li> <li>• allcove: youth wellness center</li> <li>• RCFE: Sunrise Assisted Living (Assisted Living and Memory Care)</li> <li>• RCFE: Healing Living Campus (Assisted Living and Memory Care)</li> <li>• Beach Cities Surgery Center</li> <li>• PACE (Program All-Inclusive Care for the Elderly) <ul style="list-style-type: none"> <li>○ Primary care</li> <li>○ Occupational and physical therapy</li> <li>○ Pharmacy</li> <li>○ Dental care</li> <li>○ Nutrition services</li> <li>○ Adult day care</li> <li>○ In-home supports</li> </ul> </li> <li>• Silverado Senior Living (Memory Care)</li> <li>• Home-based services</li> <li>• Counseling services</li> <li>• Youth mental health services</li> <li>• Easter Seal—adult day care</li> <li>• In-Home services (for care management clients)</li> <li>• UCLA Health</li> <li>• South Bay Home Health Care—durable medical equipment</li> </ul>
  	<ul style="list-style-type: none"> <li>• Venice Family Clinic (Federally Qualified Health Center)</li> <li>• Lisa Graziano, MFT</li> <li>• Community Psychiatry Management</li> <li>• Beach Cities Advanced Imaging</li> <li>• South Bay Children's Health Center</li> <li>• Advanced Urology</li> <li>• Advanced Oncology South Bay</li> <li>• Reproductive Partners Medical Group</li> <li>• Oceanside Acupuncture</li> <li>• Savantcare Mental Health Clinic</li> <li>• Labcorp—laboratory services</li> <li>• Torrance Memorial Women's Center</li> <li>• Providence Family Medical Center</li> <li>• Peak Orthopedic Physical Therapy</li> <li>• South Bay Pharmacy</li> <li>• South Bay Eye Institute</li> <li>• Beach Cities Dermatology</li> <li>• Quest Diagnostics—laboratory services</li> <li>• COR Healthcare Medical Associates—Cardiology</li> </ul>

## **CONCLUSIONS**

BCHD operated during Covid for the benefit of a SUPERMAJORITY of non-residents of the District.

BCHD plans to allow a 3<sup>rd</sup> party Developer/Owner/Operator to develop for a SUPERMAJORITY of non-residents of the District.

BCHDs proposed RCFE is for 80% non-residents.

BCHDs proposed PACE is sized for 96% non-residents.

BCHDs proposed “allcove” youth mental health services has a 91% non-resident service area.

BCHD has negative quality of life and financial property value impacts on surrounding neighborhoods

BCHD proposes to nearly triple the campus size from an original 100,000 sqft to the current 312,000 sqft to 793,000 sqft.

BCHD proposes to build at 110-feet above surrounding property that is zoned for 30-feet.

BCHDs expansion actions will further damage surrounding neighborhoods.

BCHD acknowledges it has damaged surrounding neighborhoods.

BCHD has made no effort to evaluate the value of its damages.

BCHD strategic planning half-day meetings are 90%+ board, executives, staff, consultants, contractors, committee members and affiliated volunteers and less than 10% public. As such, BCHD strategic plan and priority based budgets are insider documents without meaningful public participation.

BCHD damages to the community from 80-96% non-resident services swamp the benefits of 4-20% resident services.

BCHD’s unvetted “awards” from paid trade associations with colleagues as evaluators must be discarded.

BCHD’s is a passive investor and real estate manager and should be dissolved.

BCHD’s misstates the seismic findings. BCHD is in compliance with seismic best practices and the 514 building has 25-year seismic life under best practices according to BCHD’s engineering consultant (document included as evidence).

BCHD has no obligation or need to demolish the 514 building.

BCHD's Claims in 32121 j) Are Supermajority False and BCHD did not establish, operate, etc. the private businesses that are tenants.

BCHD claims in 32121 i) are false as PACE and other programs do not exist.

BCHD claims in 32121 c) are false as BCHD has no lessor relationship with any business or service in the 510 and 520 N Prospect Commercial Office Buildings yet falsely claims a direct relationship. BCHD has only a lessor relationship with the building owners of 510 and 520 COB.

BCHD claims in 32121 m) are unvetted and must be rejected.

BCHD claims in 32121 o) are unvetted and require provision of JV, partnership or corporation documents.

BCHD claims in 32121 r) are unvetted and contain false claims, such as PACE which does not exist at BCHD. BCHD must provide documents demonstrating its beneficial relationship with tenants beyond being a lessor as well. Merely leasing property does not establish any beneficial relationship. UCLA has other clinics in the Beach Cities leased from other vendors of real estate.

BCHD's existing RCFE CUP is void if the RCFE is located anywhere but in the 514 building.

BCHD's campus and 514 building zoning of P-CF does not allow PACE or adult daycare as a conditional use.

BCHD's C-2 zoned lot is the only location on the site with a conditional use for adult daycare subject to approval.



**From:** [Mark Nelson \(Home Gmail\)](#)  
**To:** [CityClerk](#)  
**Subject:** Public Comment on BCHD Project to BCHD BoD Meeting 7/25/22  
**Date:** Monday, July 25, 2022 2:39:13 PM

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Non-Agenda Comment to City Council and Planning Commission

The following comments were made to the Board of BCHD and reflect citizen concerns about BCHD failed project planning to this point.

BCHD BoD 7-25-22 Ecomment VII.3) Properties Committee:

Nine of 12 BCHD potential Developer/Owner/Operators withdrew (75%) due to stated concerns about poor BCHD project economics and poor BCHD project design according to Cain Bros presentation. All three "finalists" have some form of alternative project proposed. It is s clear that BCHD and its designers and consultants have bungled the project until now and that the selected vendor will need to clean up BCHDs trail of errors. I oppose all recommendations of the non-objective committee that includes BCHD's project consultant Biro who has a conflict due to BCHD payment contract to his firm. I object to BCHD continuing to the CUP/PCDR/DRG phase due to its already demonstrated incompetence. The Developer/Owner/Operator needs to move ahead in an attempt to provide the fiduciary protection that BCHD refuses to implement.

BCHD BoD 7-25-22 Ecomment VII.3.A) INFORMATIONAL UPDATE REGARDING PHASE I OF HEALTHY LIVING CAMPUS AT 514 PROSPECT AVENUE, REDONDO BEACH AND SELECTION PROCESS FOR DEVELOPER/LESSEE/OPERATOR AND DESIGN-BUILD FIRM

Assuming Cain Bros handpicked the 12 potential Developer/Owner/Operators based on our taxpayer payment to them, and that 75% fell out, either they were sham bidders of the project is an abject failure under BCHD's so-called leadership and its \$16M army of consultants. 75% of potential D/O/Os withdrew due to stated poor economics and poor design. On average, the remaining three offer lease payments to BCHD of \$1.5M annual and a chargeback of \$1.1M for BCHD use of the facility for 91% non-resident allcove, 96% non-resident PACE and BCHD staff offices. Further, the RCFE is for 80% non-residents. It is clear this facility is for non-residents and in violation of both the formation of South Bay Hospital District and SBHD's court filings to develop a facility for the benefit of residents of the District. \$400,000 net for 3 acres of P-CF public owned and zoned land is a dereliction by BCHD.

BCHD BoD 7/25/22 eComment Item VII.3.B) HLC Land Survey Contract

BCHD should cease all expenditures on the Wealthy Living Campus project until such time as a competent economic and design team is on board.

BCHD BoD 7/25/22 eComment Item VII.3.C) Design Budget Increase

BCHD should cease all expenditures on the Wealthy Living Campus project until such time as a competent economic and design team is on board. Further, since 75% of Developer/Owner/Operator candidates' primary reason for abandoning the project was poor economics and design, BCHD should examine litigation against the design firm as part of BCHDs fiduciary responsibility to taxpayers.

BCHD BoD 7/25/22 eComment Item XA) Allcove

BCHD should cease all expenditures on the allcove project until such time as BCHD has a long term cost recovery mechanism in place. According to BCHD's Press Releases, 91% of the allcove target residents are non-residents of the district.

**From:** [Warren Croft](#)  
**To:** [Info@lalafo.org](mailto:Info@lalafo.org); [CityClerk](#); [cityclerk@torranceca.gov](mailto:cityclerk@torranceca.gov)  
**Subject:** BCHD Public Comment for September 2022 LALAFCO Board Meeting  
**Date:** Friday, August 5, 2022 1:26:42 PM

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Dear Board Members of LALAFCO:

This is a comment for your September 2022 Board meeting where you will be considering the BCHD Municipal Service Review report.

BCHD should be dissolved because it is not operating for the benefit of, or in the best interest of the residents of the District.

If BCHD's project proceeds, District residents will lose 3 acres of our land for up to 95 years when BCHD signs a lease with a private developer/owner/operator and if BCHD receives the needed permits from the Cities of Redondo Beach and Torrance. The developer plans to build a \$12,000+/month assisted living facility for people with \$200,000 and above incomes. The private facility is being built for 80% non-residents of the District.

BCHD will have no ownership in the project.

Even though BCHD will receive a rent payment of \$1.5M per year for the land, BCHD will have to pay more than half of that back to the developer in rent for BCHD's new offices and facilities in the developer's building.

BCHD has already signed a deal for a youth wellness program called "allcove" where BCHD will provide services as far away as Long Beach. 91% of the service area for BCHD's program will be non-residents of the District.

BCHD plans to offer an adult daycare program called PACE. BCHD refuses to say how many PACE participants they think will be from the District. National statistics show that the District should expect only 16 out of its 400 person planned capacity to come from the three beach cities. 96% of PACE enrollees will be non-residents of the District.

When South Bay Hospital District was voted into existence, it was for the benefit of the residents of the District. It is bond and property tax funded by the residents.

BCHDs proposed future project, the HLC, is for over 80% non-residents of the District. Even during Covid, BCHD tested nearly 85% non-residents and left District taxpayers with several million dollars in costs for out-of-District services and overheads.

If BCHD prefers to serve non-residents of the District, then it should be dissolved and the District's property tax funding put to better health uses inside the District. Please add my comment to the Municipal Service Review record at the September Board meeting as a formal comment in favor of opening a proceeding to dissolve BCHD.

Thank you,

Warren Croft

**From:** [Jacqueline Caro](#)  
**To:** [info@lalafo.org](mailto:info@lalafo.org)  
**Cc:** [CityClerk](#); [City Clerk](#)  
**Subject:** BCHD Public Comment for September 2022 LALAFCO Board Meeting  
**Date:** Friday, August 5, 2022 12:13:30 PM

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

Dear Board Members of LALAFCO:

This is a comment for your September 2022 Board meeting where you will be considering the BCHD Municipal Service Review report.

BCHD should be dissolved because it is not operating for the benefit of, or in the best interest of the residents of the District.

If BCHD's project proceed, District residents will lose 3 acres of our land for up to 95 years when BCHD signs a lease with a private developer/owner/operator and if BCHD receives the needed permits from the Cities of Redondo Beach and Torrance. The developer plans to build a \$12,000+/month assisted living facility for people with \$200,000 and above incomes. The private facility is being built for 80% non-residents of the District.

BCHD will have no ownership in the project.

Even though BCHD will receive a rent payment of \$1.5M per year for the land, BCHD will have to pay more than half of that back to the developer in rent for BCHD's new offices and facilities in the developer's building.

BCHD has already signed a deal for a youth wellness program called "allcove" where BCHD will provide services as far away as Long Beach. 91% of the service area for BCHD's program will be non-residents of the District.

BCHD plans to offer an adult daycare program called PACE. BCHD refuses to say how many PACE participants they think will be from the District. National statistics show that the District should expect only 16 out of its 400 person planned capacity to come from the three beach cities. 96% of PACE enrollees will be non-residents of the District.

When South Bay Hospital District was voted into existence, it was for the benefit of the residents of the District. It is bond and property tax funded by the residents.

BCHDs proposed future project, the HLC, is for over 80% non-residents of the District. Even during Covid, BCHD tested nearly 85% non-residents and left District taxpayers with several million dollars in costs for out-of-District services and overheads.

If BCHD prefers to serve non-residents of the District, then it should be dissolved and the District's property tax funding put to better health uses inside the District. Please add my comment to the Municipal Service Review record at the September Board meeting as a formal comment in favor of opening a

proceeding to dissolve BCHD.

Thank you.

Jackie Ecklund

**From:** Stop BCHD  
**To:** [info@lalafo.org](mailto:info@lalafo.org)  
**Cc:** [CityClerk-cityclerk@torranceca.gov](mailto:CityClerk-cityclerk@torranceca.gov)  
**Subject:** Public Comment - BCHD MSR and SOI  
**Date:** Sunday, August 7, 2022 9:49:38 PM

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

Dear Board Members of LALAFCO - September 2022 BCHD MSR and SOI Hearing:

This is a comment for your September 2022 Board meeting where you will be considering the BCHD Municipal Service Review report.

BCHD should be dissolved because it is not operating for the benefit of, or in the best interest of the residents of the District.

If BCHD's project proceeds, District residents will lose 3 acres of our land for up to 95 years when BCHD signs a lease with a private Developer/Owner/Operator and if BCHD receives the needed permits from the Cities of Redondo Beach and Torrance. The developer plans to build a \$12,500+/month assisted living facility for people with \$200,000 and above pretax incomes. The private facility is being built for 80% non-residents of the District according to Exhibit 3-3 of BCHD's marketing vendor MDS..

BCHD will have no ownership in the project.

Even though BCHD will receive a rent payment of \$1.5M per year for the land, BCHD will have to pay \$800,000 of that back to the developer in rent for BCHD's new offices and facilities in the developer's building.

BCHD has already signed a deal for a youth wellness program called "allcove" where BCHD will provide services as far away as Long Beach. 91% of the service area for BCHD's program will be non-residents of the District and over 75% are for non-residents of the SOI. (according to BCHD PR <https://www.bchd.org/allcovebeachcities>)

BCHD plans to offer an adult daycare program called PACE. BCHD refuses to say how many PACE participants they think will be from the District. National statistics show that the District should expect only 16 out of its 400 person planned capacity to come from the three beach cities. 96% of PACE enrollees will be non-residents of the District and undoubtedly, a huge fraction will be from outside the SOI.

**When South Bay Hospital District was voted into existence, it was for the benefit of the residents of the District. It is bond and property tax funded by the residents.** (Superior Court INGL- C1594 July 31, 1957)

BCHDs proposed future project, the HLC, is for over 80% non-residents of the District. Even during Covid, BCHD tested nearly 85% non-residents and left District taxpayers with several million dollars in costs for out-of-District services and overheads.

**If BCHD prefers to serve non-residents of the District, then it should be dissolved and the District's property tax funding put to better health uses inside the District. Please add my comment to the Municipal Service Review record at the September Board meeting as a formal comment in favor of opening a proceeding to dissolve BCHD.**

Thank you.

/s see undersigned at bottom of message

The following residents request a dissolution hearing for BCHD based on misconduct. BCHD is planning a facility called the Healthy Living Campus that will have a Developer/Owner/Operator and will have 0% BCHD ownership.

Based on BCHD consultant estimates, 80% of the RCFE tenants will be non-residents of the District. 91% of "allcove" service area is outside the district and up to 96% of PACE will be non-residents of the district.

In the case of "allcove", BCHD has published the service area, and over 75% of the services will be for non-residents of the SOI, yet, BCHD requested no authority from LALAFCO.

<https://www.stopbchd.com/post/on-8-8-22-bchd-plans-to-approve-a-bad-deal-to-use-our-land-to-benefit-90-non-residents>

Aileen Pavlin [arpavlin@gmail.com](mailto:arpavlin@gmail.com)  
Alex Sesi [alexsesi123@gmail.com](mailto:alexsesi123@gmail.com)  
Andrew Chaffee [ajchaff@gmail.com](mailto:ajchaff@gmail.com)  
Anthony J Skelly [scfarmd@yahoo.com](mailto:scfarmd@yahoo.com)  
BD Foster [FosterNotFrozen11@yahoo.com](mailto:FosterNotFrozen11@yahoo.com)  
Barbara Kiyokane [bkiyokane@gmail.com](mailto:bkiyokane@gmail.com)  
Bethany Johnson [bethany.johnson@roadrunner.com](mailto:bethany.johnson@roadrunner.com)  
Brian Broryol35@yahoo.com  
Carol P Skelly [carolpskelly@yahoo.com](mailto:carolpskelly@yahoo.com)  
Christine Ferrero [ferrfun@yahoo.com](mailto:ferrfun@yahoo.com)  
Danny Fink [jamfinky@yahoo.com](mailto:jamfinky@yahoo.com)  
Donna Evans [teshatr@aol.com](mailto:teshatr@aol.com)  
Doug Field [doug.field@outlook.com](mailto:doug.field@outlook.com)  
Flannery, Patrick [paddyflann@verizon.net](mailto:paddyflann@verizon.net)  
Fred Stein [steinnyboy1963@gmail.com](mailto:steinnyboy1963@gmail.com)  
Gennaro jerrygooboo@gmail.com  
Glen ninjabytes@hotmail.com  
JOYCE FIELD [jafield@verizon.net](mailto:jafield@verizon.net)  
JOYCE FIELD [jafield@verizon.net](mailto:jafield@verizon.net)  
Jeanne Sinsheimer [sajb@aol.com](mailto:sajb@aol.com)  
Jeannie Smith [JeannieJ84@yahoo.com](mailto:JeannieJ84@yahoo.com)  
Jill Klausen [jillywklausen@gmail.com](mailto:jillywklausen@gmail.com)  
Kathy McLeod [kathydmcleod@mc.com](mailto:kathydmcleod@mc.com)  
Krista Allen [kristakallen@aol.com](mailto:kristakallen@aol.com)  
Lara Duke [larajs@yahoo.com](mailto:larajs@yahoo.com)  
Linda Feldman [imalinda@aol.com](mailto:imalinda@aol.com)  
LuJean Levy [guarded-slips.0s@icloud.com](mailto:guarded-slips.0s@icloud.com)  
Maher Sesi [mseesi@aol.com](mailto:mseesi@aol.com)  
Marcio N [mnavah@hotmail.com](mailto:mnavah@hotmail.com)  
Marianne Teola [mjteola@aol.com](mailto:mjteola@aol.com)  
Melanie Cohen [melaniecohen372@gmail.com](mailto:melaniecohen372@gmail.com)  
Michael Jamgochian [jammer.1@verizon.net](mailto:jammer.1@verizon.net)  
Mike Pirich [car@mindspring.com](mailto:car@mindspring.com)  
Naomi [naomiusa@msn.com](mailto:naomiusa@msn.com)  
Pamela Absher [pamabsher@yahoo.com](mailto:pamabsher@yahoo.com)  
Patricia Ann Mintun [Patty504@yahoo.com](mailto:Patty504@yahoo.com)  
Patricia Yee [ceylp@yahoo.com](mailto:ceylp@yahoo.com)  
Patrick Wickens [patwickens@verizon.net](mailto:patwickens@verizon.net)  
Paula Shoda [ptshoda@aol.com](mailto:ptshoda@aol.com)  
Phoebe [cowpatches@yahoo.com](mailto:cowpatches@yahoo.com)  
Reggie Stein [Reggie.Stein@mail.com](mailto:Reggie.Stein@mail.com)  
Rob Levy [guarded-slips.0s@icloud.com](mailto:guarded-slips.0s@icloud.com)  
Sandy Schreyer [sandy\\_schreyer@yahoo.com](mailto:sandy_schreyer@yahoo.com)  
Steve Rosemary [steve@3leafreality.com](mailto:steve@3leafreality.com)  
Stevie Powell [powellstevie72@gmail.com](mailto:powellstevie72@gmail.com)  
Ty Brown [browniebue22@yahoo.com](mailto:browniebue22@yahoo.com)  
Virginia Minami [Evirginias@hotmail.com](mailto:Evirginias@hotmail.com)  
William Shanney [wshanney@verizon.net](mailto:wshanney@verizon.net)  
Zelik [linzelik@gmail.com](mailto:linzelik@gmail.com)  
michael woolsey [marinafinearts@aol.com](mailto:marinafinearts@aol.com)

**BCHD IS OWNED AND FUNDED BY THE TAXPAYERS OF MANHATTAN, HERMOSA, AND REDONDO BEACH**

BCHD Proposes to Expand its Services to this List of 1.3M Non-BCHD Taxpayers with Funding from HB/MB/RB			POPULATION POPULATION FRACTION		RCFE ALLCOVE PACE		AVERAGE BCHD PROGRAM BENEFIT	ALLCOVE
Source	US Census	Computed	BCHD MDS Consultant Report	BCHD Press Releases	NPAOnline statistics	Computed		
Non-Taxpayer Share			80.6%	91.3%	95.7%	89.2%	91.3% NON-RESIDENTS OF DISTRICT	
BCHD Taxpayer Share			19.4%	8.7%	4.3%	10.8%	8.7% RESIDENTS OF DISTRICT	
							23.0% TOTAL SOI WITH DISTRICT	
							77.0% NON-RESIDENTS OF DISTRICT AND SOI	
Athens			0.0%	0.6%				
Avalon			0.0%	0.3%				
Carson			0.0%	6.4%				
Catalina Island			0.0%	0.0%				
El Segundo			2.9%	1.2%				
Gardena			0.0%	4.3%				
Harbor City			0.0%	1.8%				
Hawthorne			0.0%	6.2%				
Inglewood			0.0%	7.8%				
Lawndale			0.5%	2.3%				
Lennox			0.0%	1.6%				
Long Beach			0.0%	33.1%				
Hermosa			2.9%	1.3%	0.7%	1.6%		
Manhattan			8.4%	2.6%	1.3%	3.7%		
PVE			10.6%	0.9%				
Rancho Dominguez			0.0%	1.1%				
RPV			19.5%	3.0%				
Redondo Beach			8.1%	4.8%	2.4%	5.0%		
Rolling Hills			1.2%	0.1%				
RHE			6.5%	0.6%				
San Pedro			0.0%	6.1%				
Torrance			10.1%	10.3%				
Wilmington			0.0%	3.8%				
Beyond Listed Cities			30.0%	0.0%				
Total Population								
BCHD Cities								
BCHD Residents as Fraction Total Population or Benefits			19.4%	8.7%	4.3%	10.8%		
1) BCHD kept no records of testing city of residence, LACDPH offered total fraction data of BCHD vs Non-Residents 2) MDS report states 30% of RCFE tenants will be from outside listed zipcodes 3) Palos Verdes Peninsula Cities disaggregated by population shares 4) RCFE data based on BCHD MDS Consultant report 5) Covid testing based on LA County Dept of Public Health after BCHD responded that it was not tracking resident vs non-resident 6) PACE is based on National PACE Association data of 0.1% seniors utilizing PACE. (17 BCHD residents)								

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



**From:** [Laura Zahn](#)  
**To:** [Res. Against Overdevelopment](#)  
**Cc:** [CityClerk](#); [cityclerk@torranceca.gov](mailto:cityclerk@torranceca.gov); [Stop BCHD](#)  
**Subject:** Dissolve the fraudulent Beach Cities Health District  
**Date:** Tuesday, August 9, 2022 9:55:43 AM

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

To whom it may concern, my name is Laura D. Zahn I was born in 1953 AT Torrance Memorial Hospital in Torrance, CA because the TAX-PAYER Bonded South Bay Hospital was not completed yet. My sister born in 1952, and my brother born in 1954 also were born at Torrance Memorial because the South Bay Hospital was not completed yet. HOWEVER... 12 of my family members\* VOTED FOR AND PAID INTO THAT BOND TO PAY OFF THE PURCHASE OF THE FORMER MR. HUNTINGTON'S PROPERTY THAT WAS TAKEN BY EMINENT DOMAIN UNDER A CONDITIONAL USE PERMIT THAT STATED...That this property would ALWAYS be used AS a HOSPITAL FOR the THREE BEACH CITIES of MANHATTAN BEACH, HERMOSA BEACH AND REDONDO BEACH... OR BE DISSOLVED.

This TAX PAYER bonded land was NOT to be used for any other purpose, NOT an ASSISTED LIVING FACILITY, NOT a "Health-Center" (gym type of facility), NOT a Training -Center for others/staff, NOT a day-use facility for Seniors, NOT a mental-health facility for tweens/teens/adults, NOT a massive parking garage, NOT an Aquatic Center, NOT passive-green-space for day users.

EVERY "PROGRAM" or "USE" that the NEWLY dubbed **Beach Cities Health District** has and is proposing are **DUPLICATE PROGRAMS**, that other organizations have created and are successfully operating. Beach Cities Health District is just piggy-backing on other successful programs, offering nothing new or original. In one of Tom Bakaly's proposals HE even indicates that HIS organization (BCHD) WILL CHARGE these successful organizations a USER FEE for providing THEIR OWN program to folks that choose to attend at HIS location. In horticulture when ONE organism "takes" from another organism without offering anything necessary for the primary organism's survival WE CALL THAT SECONDARY ORGANISM A PARASITE!

My relatives along with other families alive and living at the time the Huntington Land was taken, CHOOSE to BOND this land FOR a LOCAL HOSPITAL FOR LOCAL RESIDENTS of the THREE BEACH CITIES. Manhattan/Hermosa/Redondo. NO-ONE was "supper wealthy" in the late 40's and early 50's when this IDEA and project was presented to those tax-payers. BUT everyone in those THREE BEACH CITIES understood the IMPORTANCE of having a LOCAL hospital and MADE THE FINANCIAL SACRIFICE to make it happen.

Yes, we ALL understand that the current/existing Hospital/Building may not be as

structurally sound as a NEW BUILT facility...We ALL also understand that the now former South Bay Hospital entity was not operating in the strongest financial capacity. HOWEVER, that does not mean that the ORIGINAL BOND-Purchased LAND should be wholesaled OUT to the highest bidder. Mr. Huntington and his family and his financial backers were NOT wishing TO sell this piece of property, JUST like the Bruce family IN Manhattan Beach that had their "Beach Resort" for African Americans taken by Eminent Domain. I am sure most of you reading my comments are at least vaguely familiar with what has transpired with that land. Several prominent politicians along with some very passionate people VOTED to RETURN that land BACK TO the Bruce family. Karma has its way doesn't it?

Well, we have enough passionate people, and some politicians on our side to dissolve BCHD and to KEEP the land ZONED for what the purpose of the Eminent Domain and the ORIGINAL Conditional Use Permit WAS approved for. Perhaps WE should start by REACHING OUT to the Huntington family and informing them that THEIR land that was taken all those many years ago is possibly NOT GOING TO BE USED FOR THE PURPOSE INTENDED!

Some of my biggest issues are 1) that the potential users of this massive facility IF it gets built will not be from the THREE BEACH cities. 2) ALL of BCHD programs are NOT scaled or focused ON the THREE BEACH CITIES, 3) No-one mentions that the ROOMS for the Residential Care Facility for the Elderly (RCFE) are SHARED ROOMS, (Seriously who wants to pay upwards of \$12,000 a month for a SHARED ROOM???) 4) Tom Bakaly has his SITES on a HUGE CAPTURE of INCOME for his BOARD from OTHER organizations programs, at the EXPENSE of the Tax-payers from the three beach cities, Manhattan Beach/Hermosa Beach/Redondo Beach. 5) Redondo Beach has enough Senior Care Facilities both Corporate ran and private home conversions.

Laura D. Zahn

\* Florance Zahn-Crow (Paternal Grandmother )  
John Crow (Paternal Step-Grandfather)  
Chester Tornbom (Maternal Grandfather)  
Kathrine Tornbom (Maternal Grandmother)  
Carl Tornbom (Maternal Uncle)  
Mary Tornbom (Maternal Aunt)  
Roy Zahn (Father)  
Kay T. Zahn (Mother)  
Pat Sullivan (Paternal Uncle)  
Marjorie Sullivan (Paternal Aunt)  
Sally Hartman (Paternal Aunt)  
Vern Hartman (Paternal Uncle)

# For Immediate Release

The neighborhood community of StopBCHD.com provides a 100+ page review of BCHD's incompatible and inconsistent proposed project. As demonstrated, BCHD's consultants and contractors have met virtually none of the requirements of the Redondo Beach Municipal Code for Planning Commission Design Review (PCDR), Conditional Use Permit (CUP), or Residential Design Guidelines (RDG).

The attached document decomposes the letter of the RBMC and demonstrates BCHD's plans non-compliance. Based on review of other Planning Commission Design Review documents, this is the most thorough examination of a project undertaken.

BCHD is proposing a 108-foot, 8-inch building that would be the tallest building built in Redondo Beach since 1973. ReCondo Beach should not return to life.

BCHD's project character fails to meet RDG and explicitly violates a number of conditions. BCHD also fails to meet the majority of conditions required for the PCDR. Furthermore, the CUP cannot be satisfied with the failure to meet the RDG and PCDR.

StopBCHD.com is available for interviews and discussions and will provide a vigorous presentation to the Planning Commission and City Council as required.



**Stop BCHD Overdevelopment**

Enforce Municipal Codes and Protect Quality of Life

**StopBCHD.com   StopBCHD@gmail.com**

# **Summary of Analysis of CUP, PCDR and RB RDG Compliance of BCHD Proposed Commercial Developer/Owner/Operator Project**

## Summary

Based on modeling and evaluation of the individual factors and features of the Conditional Use Permit (CUP), Planning Commission Design Review (PCDR) and Residential Design Guidelines (RDGs):

- 1) The project is not consistent or compatible with neighborhood character.
- 2) The project does not protect property values.
- 3) The majority of the project's features/factors do not comply with RBMC.
- 4) The project's data is insufficient.
- 5) The project is specifically developed to service a supermajority of non-residents of the District (80-96% non-residents) and of Redondo Beach (92-98% non-residents).
- 6) The project as proposed fails to meet the requirements for a CUP, a PCDR, and is inconsistent with the intent of the RDGs.

# **Legal Compliance Obligations of BCHD and the City**

**The City has several municipal codes and guidelines intended to ensure compatibility, protect property values, stop adverse effects on surrounding property, and ensure neighborhood character consistency. They are all highlighted in the reports.**

**Based on substantial documentation and analysis of the RBMC and Guidelines, BCHDs plans, the surrounding neighborhoods, and Redondo Beach historical building approvals – BCHD failed to comply with the requirements set forth. Public comment from 2019 to current to BCHD has clearly indicated BCHDs failure in hundreds if not thousands of public comments and thousands of pages in the BCHD formal record.**

**In its comments to BCHD's pre-CUP, the City has failed to protect the residents and enforce the provisions of the RBMC. The City made no comments regarding size, height, compatibility, consistency, or any other clear violation of RBMC by the plan in the pre-CUP. If there are non-public "deals" being made between the City and BCHD, they MUST be disclosed. Two public agencies have NO REASON to withhold their interactions from the voters, especially when Redondo Beach bears 100% of the damages and is roughly 75% of the population of the District.**

**The City's obligation is to enforce the RBMC for the protection of Redondo Beach residents.**

**The following report contains exhaustive analysis of the project and provides a foundation for the City to either get this project into compliance or to deny it.**

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

From an operational perspective, the CUP compliance is evaluated factor or feature at-a-time to determine if each condition is met.

# **RBMC 10-2.2502 Planning Commission Design Review (PCDR)**

- (a) **Purpose.** Planning Commission Design Review is established to **ensure compatibility**, originality, variety, and innovation in the architecture, design, landscaping, and site planning of developments in the community. The provisions of this section will serve to **protect property values**, prevent the blight and deterioration of neighborhoods, promote sound land use, encourage design excellence, and **protect the overall health, safety**, and welfare of the City.

In addition to the text of 10-2.2502, the PCDR also requires:

- (b)(7) **Consistency with Residential Design Guidelines** The project shall be **consistent with the intent of residential design guidelines** adopted by resolution of the City Council

From an operational perspective, the PCDR compliance is evaluated factor or feature at-a-time to determine if each condition is met.



# Redondo Beach Residential Design Guidelines (RB RDG)

**Objective.** An important objective of the City of Redondo Beach Strategic Plan is to improve the quality of life in residential neighborhoods. These design guidelines [RDG] are intended to help accomplish this objective by ensuring that new homes or additions to existing homes are of high architectural quality; are compatible in mass, scale, and other design features with surrounding development; and preserve and contribute to the unique character of established neighborhoods.

**Design Guideline.** New multi-family residential development should respect the development in the immediate area through the use of similar setbacks, complimentary building arrangements, buffer yards and avoidance of overwhelming building scale and visual obstructions.

From an operational perspective, the RDG compliance is evaluated factor or feature at-a-time to determine if each condition is met. The PCDR specifically states that the “intent” of the RDG must be met.

# Methodology

For the purposes of this analysis, the factors and features extracted from the CUP, PCDR and RB RDG narratives were organized into 1) Character and 2) Protection of Property Values. Any leftover factors and features were evaluated in 3) CUP/PCDR/RDG Miscellaneous report.

To the extent possible given the poor quality of the source information from BCHD, the Phases (Phase 1 and 2) of the project were evaluated separately. In many cases, there was insufficient information to assess the Phase 1 vs. Phase 2 compliance.

Last, BCHD's benefits assertions were evaluated and provided to demonstrate that BCHD's project very likely has NO NET BENEFITS to the Residents of Redondo Beach given that it is designed to serve a supermajority of non-residents of both Redondo Beach and the District.

# Summary Analysis of CUP, PCDR and RB RDG Factors

Character Factors	Source	Summary	Evaluation
All new multi-family developments should be compatible with the character of the neighborhood	RB RDG	Specific factors of the section are used to determine overall character compatibility	FAIL
Architecture	RB RDG	Propose commercial, hotel like 300,000 sqft structure with mid 1950s Miami Beach design	Inconsistent
Bulk	RB RDG	Proposed bulk is 3M+ cuft. Surrounding properties range from approximately 10,000 to 50,000 cuft.	Inconsistent
Form	RB RDG	Proposed curvilinear solid is 60 to 150X larger than surrounding properties	Inconsistent
Height	10-2.1320	Proposed project is tied for 2nd tallest building in RB, tallest since 1973, surrounded by 30-foot or lower height limits. Perimeter location causes 108'-8" structure to appear 300% of all other site buildings.	Inconsistent
Landscape	10-2.1320	Insufficient information	No Information
Mass	RB RDG	Proposed project is primarily cubic with flat roof. Surrounding neighborhoods are cubes with triangles and sloped roofs	Unknown
Material	RB RDG	Proposed project is concrete, steel and glass. Surrounding neighborhoods are primarily wood and stucco	Inconsistent
New multi-family residential development should respect the development in the immediate area through use of similar setbacks, complimentary building arrangements, buffer yards and avoidance of overwhelming building scale and visual obstructions	RB RDG	Specific factors as listed are used to determine compliance	FAIL
Roofline	RB RDG	Proposed project is flat v. surrounding pitched roofs	Unknown
Scale	RB RDG	Proposed project dominates area with 60-150X larger size, 4X taller, and larger than all Beryl Heights homes summed.	Inconsistent
Setbacks	All	Proposed project is perimeter build, maximizing visual impact. Existing Hospital is centered on site.	Inconsistent
Size	RB RDG	Proposed Ph 1 is 300,000 sf, Ph 2 is 800,000 sf. Avg surrounding property is 1712 sf.	Inconsistent
Visual Obstructions	RB RDG	Proposed project is 3x taller visually than 99%+ of existing buildings that are 52-ft or shorter.	Inconsistent
Volume	10-2.1320	Volume is 3M+ cuft compared to 10,000 to 50,000 cuft in surrounding neighborhoods.	Inconsistent
Other Features/Effects			
Open spaces and buffers	10-2.2506	Proposed project eliminated BCHD committed perimeter buffer. Project is perimeter built to maximize impacts to surrounding neighborhoods.	FAIL
Fences and walls	10-2.2506	Insufficient information	Unknown
Streets, services roads, alleys	10-2.2506	No proposed service roads for 65-95 year lease and heavy haul, passengers, fuel oil delivery and replacement, material, and emergency vehicles.	Unknown
Ingress, egress, circulation	10-2.2506	Proposed plan for construction is deficient. 8-10 story, 800 car parking ramp at Prospect and Diamond will egress and ingress on Prospect with unknown interactions during commuting and school drop off/pickup	Unknown
Signage	10-2.2506	Current excessive outdoor nighttime lighting. Insufficient plan information.	Unknown
Landscaping	10-2.2506	Insufficient information	Unknown
Noise, vibration, odor, and like	10-2.2506	Proposed up to 4MW diesel generators on perimeter will cause noise and vibration to surrounding property. BCHD claims amplified outdoor noise until 10PM.	FAIL
Off street loading	10-2.2506	Insufficient information, however required for construction, ongoing material and supplies, and people.	Unknown
Maximum development time	10-2.2506	2.5 years per BCHD claims to the public.	
Hours of operation	10-2.2506	BCHD claims outdoor amplified noise until 10pm	FAIL
Respect for natural terrain	10-2.2502	Proposed 108'-8" building on perimeter of elevated lot. Existing 76-foot courtyard referenced building in center and only 968 sf. Elevated site requires center construction to minimize, not maximize, visual impacts.	FAIL
Utilities	10-2.2502	Proposed up to 4MW diesel generators on perimeter will cause noise and vibration to surrounding property. BCHD claims amplified outdoor noise until 10PM.	FAIL
Private open space	10-2.2502	Insufficient information	Unknown
Security	10-2.2502	Insufficient information	Unknown
Crime deterrence	10-2.2502	Insufficient information	Unknown
General design concerns	10-2.2502	TBD	Unknown
Other conditions as needed	10-2.2502	TBD	Unknown
Protection of property values	10-2.2502	Current campus demonstrates \$50M decline in surrounding value in RB. Proposed is twice as tall as 99% of current campus and nearly 3X larger. BCHD refused to conduct any analysis on impacts but admits it has negative impacts.	FAIL

# CHARACTER FACTORS

The factors listed below are in the attached “Character” sections of the report

Character Factor	Source
All new multi-family developments should be compatible with the character of the neighborhood	RB RDG
Architecture	RB RDG
Bulk	RB RDG
Form	RB RDG
Height	RBMC 10-2.1320
Landscape	RBMC 10-2.1320
Mass	RB RDG
Material	RB RDG
New multi-family residential development should respect the development in the immediate area through the use of similar setbacks, complimentary building arrangements, buffer yards and avoidance of overwhelming building scale and visual obstructions.	RB RDG
Roofline	RBMC 10-2.1320, RB RDG
Scale	RB RDG
Setbacks	RBMC 10-2.1320, RB RDG
Size	RB RDG
Visual Obstructions	RB RDG
Volume	RBMC 10-2.1320

RB RDG – Redondo Beach Residential Design Guidelines  
RBMC – Redondo Beach Municipal Code

Both RBMC and the RDG are required compliance in the Planning Commission Design Review process (RB PCDR). The listed Character Factors are extracted from the Redondo Beach government sources as listed, and are evaluated on the following slides, demonstrating that the proposed BCHD Phase 1, 108'-8", 300,000 sqft building fails compliance. Further, Phase 2 also fails with a total of 800,000 sqft, about 30% larger than all Beryl Heights homes added together.

# MISCELLANEOUS FACTORS

The factors below were not analyzed in the Character section and are included in the “Miscellaneous Features/Factors” section of the report

**Additional effects and features for analysis, evaluation and modification orders pursuant to the PCDR are listed below. They are extracted from the 10-2.2506 and “other features required by this chapter” [Chapter 2] as required in the PCDR (8)(k) language.**

<b>Feature/Effect</b>	<b>Source</b>
Open spaces and buffers	10-2.2506(b)
Fences and walls	10-2.2506(b)
Streets, service roads, alleys	10-2.2506(b)
Ingress, egress, circulation	10-2.2506(b)
Signage	10-2.2506(b)
Landscaping	10-2.2506(b)
Noise, vibration, odor, and like	10-2.2506(b)
Off street loading	10-2.2506(b)
Maximum development time	10-2.2506(b)
Hours of operation	10-2.2506(b)
Respect for natural terrain	10-2.2502(b)
Utilities	10-2.2502(b)
Private open space	10-2.2502(b)
Security	10-2.2502(b)
Crime deterrence	10-2.2502(b)
General design concerns	10-2.2502(b)
Other conditions as needed	10-2.2502(b)
Protection of property values	10-2.2502(a)

To the extent that BCHD documents are available for analysis, comments on the features in the table are provided in the “CUP Miscellaneous” document. They are equally applicable to the CUP and the PCDR, as both incorporate Chapter 2 of the RBMC Title 10.

# PROPERTY VALUES

Modeling results are included in the “Property Values” section

Modeling Results Demonstrate that Within a one-half Mile Radius, Property Values Increase with Distance from BCHD Controlling for Major Characteristics

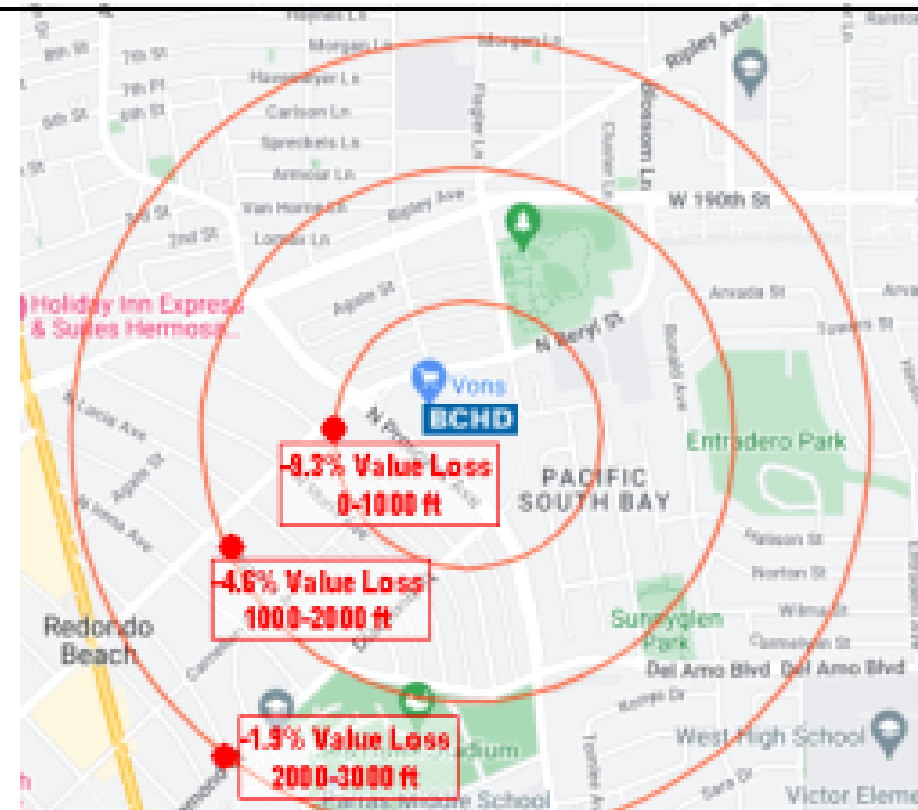
**TODAY – Existing BCHD Site Buildings**  
SIZE: 312,000 SQFT, HEIGHT: 99% is 52-feet or shorter



**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	<b>\$142,200</b>
1-2000 ft	<b>\$73,300</b>
2-3000 ft	<b>\$24,800</b>



# BENEFITS CLAIMS

BCHD's failure to disclose that only 2.4% to 8% of the planned development will serve Redondo Beach residents coupled with BCHD disregard for neighborhood damages is presented in the "Benefits Claims" section

LOCATIONS SERVED BY BCHD PROGRAM	POPULATION	POPULATION FRACTION	ALLCOVE	SAFE IN THE SOUTH BAY	RCFE	PACE	COVID TESTS	AVERAGE BCHD PROGRAM ACTIVITY	ALLCOVE	
<i>Source</i>	<i>US Census</i>	<i>Computed</i>	<i>BCHD Press Releases</i>	<i>BCHD Press Releases</i>	<i>BCHD MDS Consultant Report</i>	<i>NPAOnline statistics</i>	<i>LACDPH</i>	<i>Computed</i>		
Non-Resident Share		91.3%	91.3%	63.6%	80.6%	95.7%	84.0%	83.1%	91.3%	NON-RESIDENTS OF DISTRICT
BCHD Resident Share		8.7%	8.7%	36.4%	19.4%	4.3%	16.0%	16.9%	8.7%	RESIDENTS OF DISTRICT
									23.0%	TOTAL SOI WITH DISTRICT
									77.0%	NON-RESIDENTS OF DISTRICT AND SOI
Athens	9,000	0.6%	0.6%	0.0%	0.0%					
Avalon	3,700	0.3%	0.3%	0.0%	0.0%					
Carson	90,000	6.4%	6.4%	0.0%	0.0%					
Catalina Island	300	0.0%	0.0%	0.0%	0.0%					
El Segundo	17,000	1.2%	1.2%	5.1%	2.9%					
Gardena	60,000	4.3%	4.3%	0.0%	0.0%					
Harbor City	25,000	1.8%	1.8%	0.0%	0.0%					
Hawthorne	87,000	6.2%	6.2%	0.0%	0.0%					
Inglewood	110,000	7.8%	7.8%	0.0%	0.0%					
Lawndale	33,000	2.3%	2.3%	0.0%	0.5%					
Lennox	22,000	1.6%	1.6%	0.0%	0.0%					
Long Beach	467,000	33.1%	33.1%	0.0%	0.0%					
Hermosa	19,000	1.3%	1.3%	5.7%	2.9%	0.7%				
Manhattan	36,000	2.6%	2.6%	10.7%	8.4%	1.3%				
PVE	13,000	0.9%	0.9%	0.0%	10.6%					
Rancho Dominguez	15,000	1.1%	1.1%	0.0%	0.0%					
RPV	42,000	3.0%	3.0%	12.5%	19.5%					
Redondo Beach	67,000	4.8%	4.8%	20.0%	8.1%	2.4%		8.0%		
Rolling Hills	1,500	0.1%	0.1%	0.4%	1.2%					
San Pedro	86,000	6.1%	6.1%	0.0%	0.0%					
Torrance	145,000	10.3%	10.3%	43.2%	10.1%					
Willmington	53,000	3.8%	3.8%	0.0%	0.0%					
Beyond Listed Cities		0.0%	0.0%	0.0%	30.0%					
Total Population	1,409,500									
BCHD Cities	122,000									
BCHD Residents as Fraction Total Population or Benefits		8.7%	8.7%	36.4%	19.4%	4.3%	16.0%	16.9%		

- 1) BCHD kept no records of testing city of residence, LACDPH offered total fraction data of BCHD vs Non-Residents
- 2) MDS report states 30% of RCFE tenants will be from outside listed zipcodes
- 3) Palos Verdes Peninsula Cities disaggregated by population shares
- 4) RCFE data based on BCHD MDS Consultant report
- 5) Covid testing based on LA County Dept of Public Health after BCHD responded that it was not tracking resident vs non-resident
- 6) PACE is based on National PACE Association data of 1 in 1,000 seniors utilizing PACE. BCHD is proposing a 400 enrollee program with 17 residents



## Minimum Required Conditions for Further Project Review by the City

Based on modeling and evaluation of the individual factors and features considered in the Conditional Use Permit, Planning Commission Design Review and Residential Design Guidelines the project is demonstrated to adversely affect surrounding uses and properties; be incompatible with neighborhood character; not protect property values; and inconsistent with the intent of the Residential Design Guidelines.

**Neighborhood Consistency** - Example of compliance for assisted living in same P-CF Zoning by Kensington at Knob Hill and PCH. This is also a Developer/Owner/Operator project with a lease on publicly owned and zoned land of RBUSD, with 0% RBUSD ownership.



Kensington Assisted Living

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

“The proposed facility is compatible with the type, character, and density/intensity of the adjacent residential and commercial uses” – City of Redondo Beach



# Minimum Required Conditions for Further Project Review by the City (cont'd)

**Height Reduction** – At 108'-8" above Beryl St., BCHD's proposal is tied as the 2<sup>nd</sup> tallest building in the city (built 1973) during the era of "ReCondo" Beach. The last building built in the city above 52-ft (the height of 99+% of the current BCHD buildings' sqft) is the former Crowne Plaza in 1987 at 61-ft above the adjacent street. It is clearly commercial design, as is BCHD's proposal and is 35 years old.

**Size Reduction** – At 792,520 sqft, the proposed development is larger than all Beryl Heights residences combined. It is approximately 8X larger than the 1960 Hospital and 2.5X larger than the current totality of BCHD buildings' square feet.

**Buffer/Setback/Center of Site** – From 2019 to current, BCHD has increased the height of its proposal from 60-feet to 76-feet to 103-feet (133.5-feet above Beryl St) to 83-feet (108.7-feet above Beryl St). BCHD has also removed 160,000 sqft of underground parking and replaced it with an 8-10 story ramp at Prospect and Diamond streets. BCHD has an obligation from RDG for the "avoidance of overwhelming building scale and visual obstructions." BCHD has increased its scale and obstruction from project version to version.

**Architectural Consistency/Compatibility** – RDGs have specific character discussions of Beryl Heights. Other neighborhood character can be evaluated via this report or direct photographic surveys. BCHD needs to review Kensington and the City's approval of its style, integration, intensity, density, color, etc. BCHD current commercial building is inconsistent and incompatible and fails RBMC compliance.

**Protection of Property Values** – Not only does BCHD not protect property values, it failed to even conduct a damages analysis of property values. Only 2-8% of the use and benefits of Phase 1 accrue to Redondo Beach residents, and that CANNOT OUTWEIGH the 100% of damages from construction and operation of the facility in Redondo Beach.

**Analysis of BCHD's Phase 1 HLC Commercial  
Developer/Owner/Operator Project  
RBMC 10-2.2506 Conditional Use Permit  
Compliance: "CUP"**

# Many of the Relevant Factors to CUP Issuance Analysis and Modifications are Presented in the “Character” Reports

There is a very significant overlap between the components of Character and the Chapter 2 features listed for incorporation into evaluation and adjustment in 10-2.2506 CUP (b)(1). Below are the components of Character specifically extracted from various RBMC and RB RDG sources.

Character Factor	Source
All new multi-family developments should be compatible with the character of the neighborhood	RB RDG
Architecture	RB RDG
Bulk	RB RDG
Form	RB RDG
Height	RBMC 10-2.1320
Landscape	RBMC 10-2.1320
Mass	RB RDG
Material	RB RDG
New multi-family residential development should respect the development in the immediate area through the use of similar setbacks, complimentary building arrangements, buffer yards and avoidance of overwhelming building scale and visual obstructions.	RB RDG
Roofline	RBMC 10-2.1320, RB RDG
Scale	RB RDG
Setbacks	RBMC 10-2.1320, RB RDG
Size	RB RDG
Visual Obstructions	RB RDG
Volume	RBMC 10-2.1320

The components of Character are in the table. Issuance of a CUP that protects to the level of “no adverse effects” on surrounding uses and properties will need to analyze, evaluate, and make specific modifications to most, if not all of the BCHD Phase 1 proposal for its Commercial Developer/Owner/Operator project that leases approximately 3.2 acres of P-CF land. BCHD will not be the developer, owner or operator. 17

# Review of Other Effects and Features Provided are Provided in the Phase 1 “Miscellaneous Feature/Factor” Report

Additional effects and features for analysis, evaluation and modification orders pursuant to the CUP are listed below. They are extracted from the 10-2.2506 and “other features required by this chapter [Chapter 2]”.

Feature/Effect	Source
Open spaces and buffers	10-2.2506(b)
Fences and walls	10-2.2506(b)
Streets, service roads, alleys	10-2.2506(b)
Ingress, egress, circulation	10-2.2506(b)
Signage	10-2.2506(b)
Landscaping	10-2.2506(b)
Noise, vibration, odor, and like	10-2.2506(b)
Off street loading	10-2.2506(b)
Maximum development time	10-2.2506(b)
Hours of operation	10-2.2506(b)
Respect for natural terrain	10-2.2502(b)
Utilities	10-2.2502(b)
Private open space	10-2.2502(b)
Security	10-2.2502(b)
Crime deterrence	10-2.2502(b)
General design concerns	10-2.2502(b)
Other conditions as needed	10-2.2502(b)
Protection of property values	10-2.2502(a)

To the extent that documents are available for analysis, comments on the features in the table are provided in the “CUP Miscellaneous” document.

**Analysis of BCHD's Phase 1 HLC Commercial  
Developer/Owner/Operator Project  
RBMC 10-2.2502 Planning Commission Design  
Review: PCDR**

# **RBMC 10-2.2502 Planning Commission Design Review (PCDR)**

- (a) **Purpose.** Planning Commission Design Review is established to **ensure compatibility**, originality, variety, and innovation in the architecture, design, landscaping, and site planning of developments in the community. The provisions of this section will serve to **protect property values**, prevent the blight and deterioration of neighborhoods, promote sound land use, encourage design excellence, and **protect the overall health, safety**, and welfare of the City.

In addition to the text of 10-2.2502, the PCDR also requires:

- (b)(7) **Consistency with Residential Design Guidelines** The project shall be **consistent with the intent of residential design guidelines** adopted by resolution of the City Council

# Many of the Relevant Factors to PCDR Issuance Analysis and Modifications are Presented in the “Character” Document

There is a very significant overlap between the components of Character, Chapter 2 features, and the PCDR requirements. The CUP and PCDR are also litigated concurrently. Below are the components of Character specifically extracted from various RBMC and RB RDG sources.

Character Factor	Source
All new multi-family developments should be compatible with the character of the neighborhood	RB RDG
Architecture	RB RDG
Bulk	RB RDG
Form	RB RDG
Height	RBMC 10-2.1320
Landscape	RBMC 10-2.1320
Mass	RB RDG
Material	RB RDG
New multi-family residential development should respect the development in the immediate area through the use of similar setbacks, complimentary building arrangements, buffer yards and avoidance of overwhelming building scale and visual obstructions.	RB RDG
Roofline	RBMC 10-2.1320, RB RDG
Scale	RB RDG
Setbacks	RBMC 10-2.1320, RB RDG
Size	RB RDG
Visual Obstructions	RB RDG
Volume	RBMC 10-2.1320

# Review of Other Effects and Features Provided are Provided in the Phase 1 “Miscellaneous Features/Factors” Report

Additional effects and features for analysis, evaluation and modification orders pursuant to the PCDR are listed below. They are extracted from the 10-2.2506 and “other features required by this chapter” [Chapter 2] as required in the PCDR (8)(k) language.

Feature/Effect	Source
Open spaces and buffers	10-2.2506(b)
Fences and walls	10-2.2506(b)
Streets, service roads, alleys	10-2.2506(b)
Ingress, egress, circulation	10-2.2506(b)
Signage	10-2.2506(b)
Landscaping	10-2.2506(b)
Noise, vibration, odor, and like	10-2.2506(b)
Off street loading	10-2.2506(b)
Maximum development time	10-2.2506(b)
Hours of operation	10-2.2506(b)
Respect for natural terrain	10-2.2502(b)
Utilities	10-2.2502(b)
Private open space	10-2.2502(b)
Security	10-2.2502(b)
Crime deterrence	10-2.2502(b)
General design concerns	10-2.2502(b)
Other conditions as needed	10-2.2502(b)
Protection of property values	10-2.2502(a)

To the extent that BCHD documents are available for analysis, comments on the features in the table are provided in the “CUP Miscellaneous” document. They are equally applicable to the CUP and the PCDR, as both incorporate Chapter 2.



**Analysis of BCHD's Phase 1 HLC Commercial  
Developer/Owner/Operator Project Compliance  
with Redondo Beach Municipal Code and  
Residential Design Guidelines:  
“Phase 1 Character”**

# CHARACTER FACTORS

## Based on Redondo Beach Municipal Code and Residential Design Guidelines Applicable to the Planning Commission Design Review and Conditional Use Permitting

Character Factor	Source
All new multi-family developments should be compatible with the character of the neighborhood	RB RDG
Architecture	RB RDG
Bulk	RB RDG
Form	RB RDG
Height	RBMC 10-2.1320
Landscape	RBMC 10-2.1320
Mass	RB RDG
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New multi-family residential development should respect the development in the immediate area through the use of similar setbacks, complimentary building arrangements, buffer yards and avoidance of overwhelming building scale and visual obstructions.	RB RDG
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Scale	RB RDG
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Size	RB RDG
Visual Obstructions	RB RDG
Volume	RBMC 10-2.1320

RB RDG – Redondo Beach Residential Design Guidelines  
RBMC – Redondo Beach Municipal Code

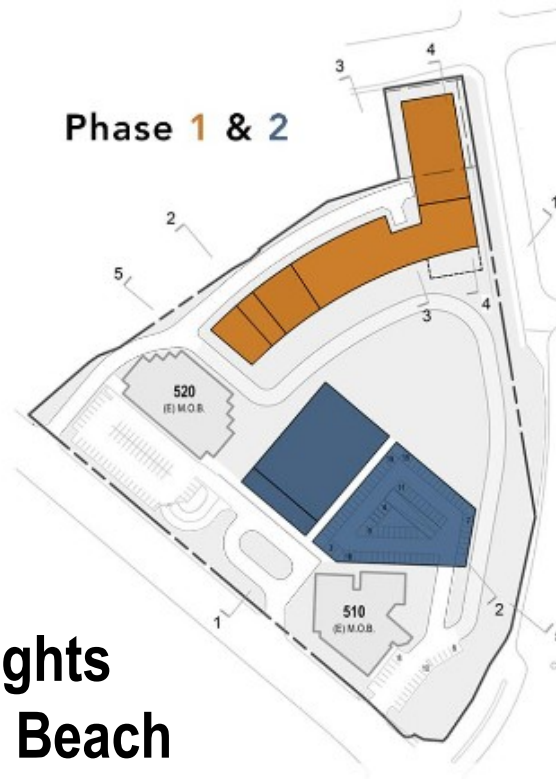
Both RBMC and the RDG are required compliance in the Planning Commission Design Review process (RB PCDR). The listed Character Factors are extracted from the Redondo Beach government sources as listed, and are evaluated on the following slides, demonstrating that the proposed BCHD Phase 1, 108'-8", 300,000 sqft building fails compliance. Further, Phase 2 also fails with a total of 800,000 sqft, about 30% larger than all Beryl Heights homes added together.

# CHARACTER FACTOR

**“All new multi-family developments should be compatible with the character of the neighborhood”**

It would be nonsensical to consider the P-CF parcel alone the “neighborhood” of the proposed 800,000 sqft development. Thus, the “neighborhood” is defined as:

**North of Beryl  
Redondo Beach  
(if not included  
in Beryl Heights,  
uses general RB  
RDGs)**



**Pacific South Bay  
Torrance  
(Character governed  
by Hillside Overlay)**

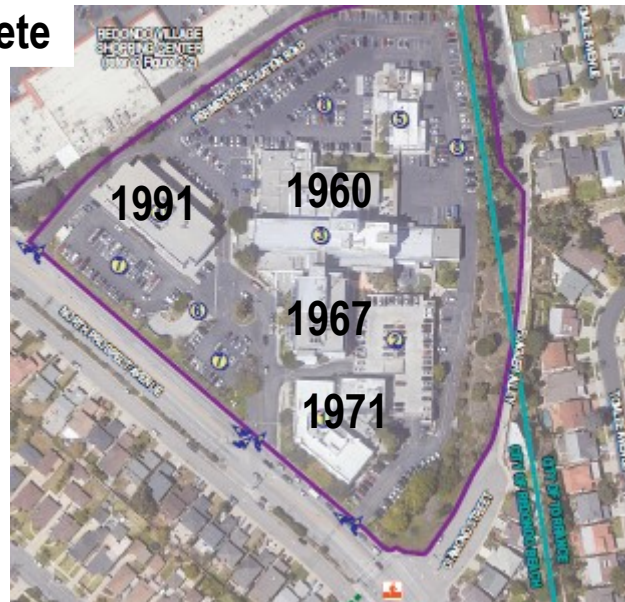
**Beryl Heights  
Redondo Beach  
(has specific RDGs)**

# CHARACTER FACTOR

**“All new multi-family developments should be compatible with the character of the neighborhood” (cont’d)**

BCHD has publicly stated that the existing compound predated the surrounding residential. That is objectively false. The majority of Beryl Heights (except Prospect and north of Beryl) pre-existed the failed Hospital by a decade. The rest of Beryl Heights pre-existed Hospital Phase 2 and both Commercial Office Buildings. Beryl Heights and Torrance pre-existed both Commercial Office Buildings.

**North of Beryl  
1963 - Complete**



**Pacific South Bay  
Torrance  
1969 - Complete**

**Beryl Heights  
Redondo Beach  
1949 – Completed west of Maria,  
1951 – Completed west of Paulina,  
1965 – Complete**

# CHARACTER FACTOR

## “Architecture”

Miami Beach 1955



BCHD 2022



BCHD’s contracted architects made no effort to be consistent with the existing neighborhood character of either Redondo Beach or Torrance. Instead, the architecture is clearly and exclusively commercial, very similar to 1955 Miami Beach commercial hotel and condo area.

Architecture character in Beryl Heights is well described in the specific RDGs approved by the Council. The BCHD roughly 110-foot above Beryl & Flagler is inconsistent with the Torrance Hillside Overlay by virtue of its privacy impacts.

Further, Beryl Heights RDGs reasonably describe the north of Beryl St multifamily area also.



# CHARACTER FACTOR “Architecture” (cont’d)



Neighborhood architecture, including for MFDs, is generally consistent as described in the Beryl Heights specific RDGs with sloping roofs and human scale features. BCHD’s proposal is clearly commercial.

## **BCHD Proposed Architecture**



## **Typical Redondo Beach and Torrance Neighborhood Architecture**

# CHARACTER FACTOR

## “Bulk”



Bulk is defined in RBMC as the total interior cubic volume of a structure.

BCHD has significantly more bulk than other neighborhood structures and is conservatively 60 to 150 times the bulk of surrounding structures.

**BCHD Courtyard View Bulk 3.2M cuft, Beryl St View Bulk 4.4M cuft**



**Beryl St MFD 47,000 cuft**



**Diamond St SFD 19,000 cuft**



**Prospect Ave SFD 18,000 cuft**



**Tomlee Ave SFD 22,000 cuft**

**Typical Redondo Beach and Torrance Neighborhood Bulk**



# CHARACTER FACTOR

## “Form”



Form is not defined in RB government sources, however it requires consideration with respect to surrounding property in RDGs. Some of the common elements of form are shape, size, and position.

BCHD proposal is 60 to 150X larger and elevated at site's edge. It's generally rectangular solid is similar form, however, its size and position are not consistent/compatible



**Typical Redondo Beach and Torrance Neighborhood Form**



# CHARACTER FACTOR

## “Height”

### Tallest buildings in Redondo Beach

Here you see the 20 tallest buildings of [Redondo Beach](#). This list only regards multi-story buildings.

#	Building	City	Floors	Height	Year
1	 Ocean Plaza	<a href="#">Redondo Beach</a>	10	≈121 ft	1974
2	 Delphi Apartments	<a href="#">Redondo Beach</a>	9	≈109 ft	1973
3	 Apartments at King Harbor	<a href="#">Redondo Beach</a>	6	≈73 ft	1973
4	 230 South Catalina Avenue	<a href="#">Redondo Beach</a>	6	≈73 ft	1974
5	 510-520 The Village	<a href="#">Redondo Beach</a>	6	≈73 ft	1980
6	 140 The Village	<a href="#">Redondo Beach</a>	6	≈73 ft	1980
7	 130 The Village	<a href="#">Redondo Beach</a>	6	≈73 ft	1980
8	 120 The Village	<a href="#">Redondo Beach</a>	6	≈73 ft	1980
9	 110 The Village	<a href="#">Redondo Beach</a>	6	≈73 ft	1980
10	 200 South Catalina Avenue	<a href="#">Redondo Beach</a>	6	≈73 ft	1972
11	 The Sand Castle	<a href="#">Redondo Beach</a>	6	≈73 ft	1971
12	 Seaview Apartments	<a href="#">Redondo Beach</a>	5	≈61 ft	1969
13	 Crowne Plaza Redondo Beach & Marina	<a href="#">Redondo Beach</a>	5	≈61 ft	1987
14	 250 The Village	<a href="#">Redondo Beach</a>	4	≈49 ft	1978
15	 240 The Village	<a href="#">Redondo Beach</a>	4	≈49 ft	1978
16	 230 The Village	<a href="#">Redondo Beach</a>	4	≈49 ft	1978
17	 220 The Village	<a href="#">Redondo Beach</a>	4	≈49 ft	1978
18	 210 The Village	<a href="#">Redondo Beach</a>	4	≈49 ft	1978
19	 Casa de Los Amigos	<a href="#">Redondo Beach</a>	4	≈49 ft	1977

## BCHD Would be the 3<sup>rd</sup> Tallest Redondo Beach Building Ever Built and the Tallest Building Since 1973

At BCHD's stated height of 108'-8" in the BCHD Pre-CUP application documents, BCHD's plan is only 5" shy of being the 2<sup>nd</sup> tallest building ever built in Redondo Beach. However, even as the 3<sup>rd</sup> tallest building, BCHD is proposing the tallest building built in Redondo Beach since the “ReCondo Beach” era of the 1970s.

Clearly if Redondo Beach has not approved a nearly 110-foot tall building since 1973, BCHD is inconsistent with nearly 50 years of Redondo Beach development practices.

# CHARACTER FACTOR

## “Height” (cont’d)



**BCHD Pre-CUP declared height 108'-8"**

Based on BCHD's Pre-CUP declared height, it is over 300% as tall at the maximum 30-foot height limit in surrounding property. It is over 400% taller than the actual maximum heights of typical SFD and MFD.

The maximum height in any surrounding neighborhood buildings is 38-feet at Beryl and Flagler (w/o HVAC) and 44-feet (w/ HVAC of 200 sqft on the roof)



**Beryl St MFD 22-feet**



**Diamond St SFD 25-feet**



**Prospect Ave SFD 23-feet**



**Tomlee Ave SFD 22-feet**

**Typical Redondo Beach and Torrance Neighborhood Height**



# CHARACTER FACTOR

## “Height” (cont’d)

As-Is



Proposed



Height Change



BCHD’s proposed Phase 1 building is visually over 300% the height of 99% of the existing BCHD buildings.

BCHD’s proposed Phase 1 building is visually over twice the height of the 0.3%, 968 sqft “BCHD Penthouse” that sits atop the failed Hospital, nearly centered on the site to minimize its visual size.

Phase 1: BCHD proposes a single 300,000 sqft, approximately 110-foot tall building on the north and east perimeter along Beryl and Flagler streets

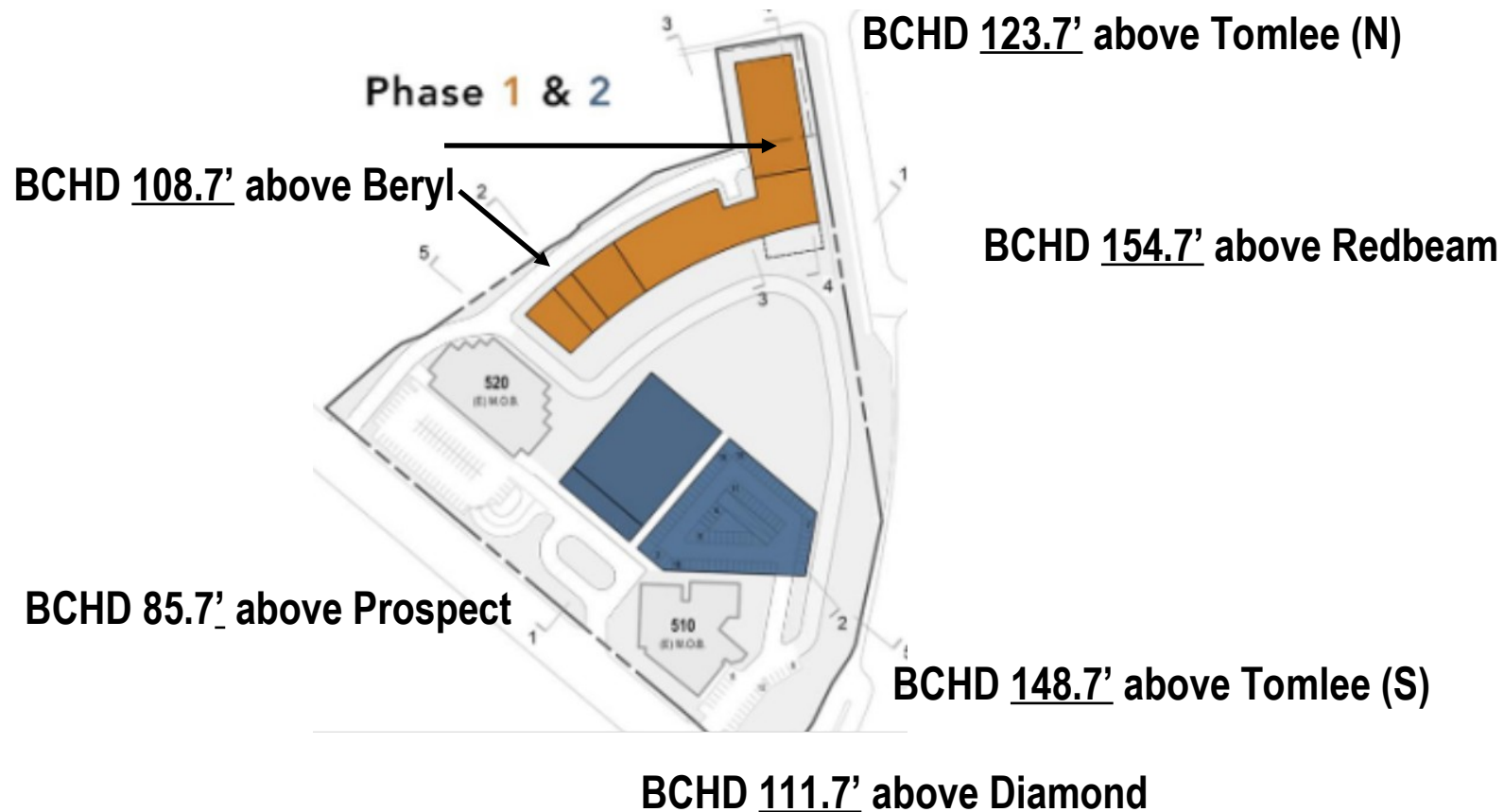
Phase 2: BCHD proposes other buildings on the west and south perimeter for a total size of 800,000 sqft



# CHARACTER FACTOR

## “Height” (cont’d)

The BCHD Proposed commercial development is over 150-feet taller than some surrounding neighborhoods.





# CHARACTER FACTOR

## “Height” (cont’d)

**BCHD has been repeatedly misrepresenting the material height of the existing buildings. BCHD asserts its 108.7-foot tall plan is little taller than the existing 76-foot “Penthouse”. BCHD fails to note the “Penthouse” is only 968-sqft or 0.3% of the existing buildings. The rest of the 99.7% (over 311,000 sqft) is 52-feet or LOWER.**



# CHARACTER FACTOR

## “Height” (cont’d)

**Visual comparison of BCHD proposed vs. existing building heights. Over 99% of the existing hospital is visually shorter than 2<sup>nd</sup> floor of the proposed, site perimeter compound**



### **BCHD Proposal**

**108.7-feet above Beryl St**

**83-feet above the interior courtyard**

### **Hospital**

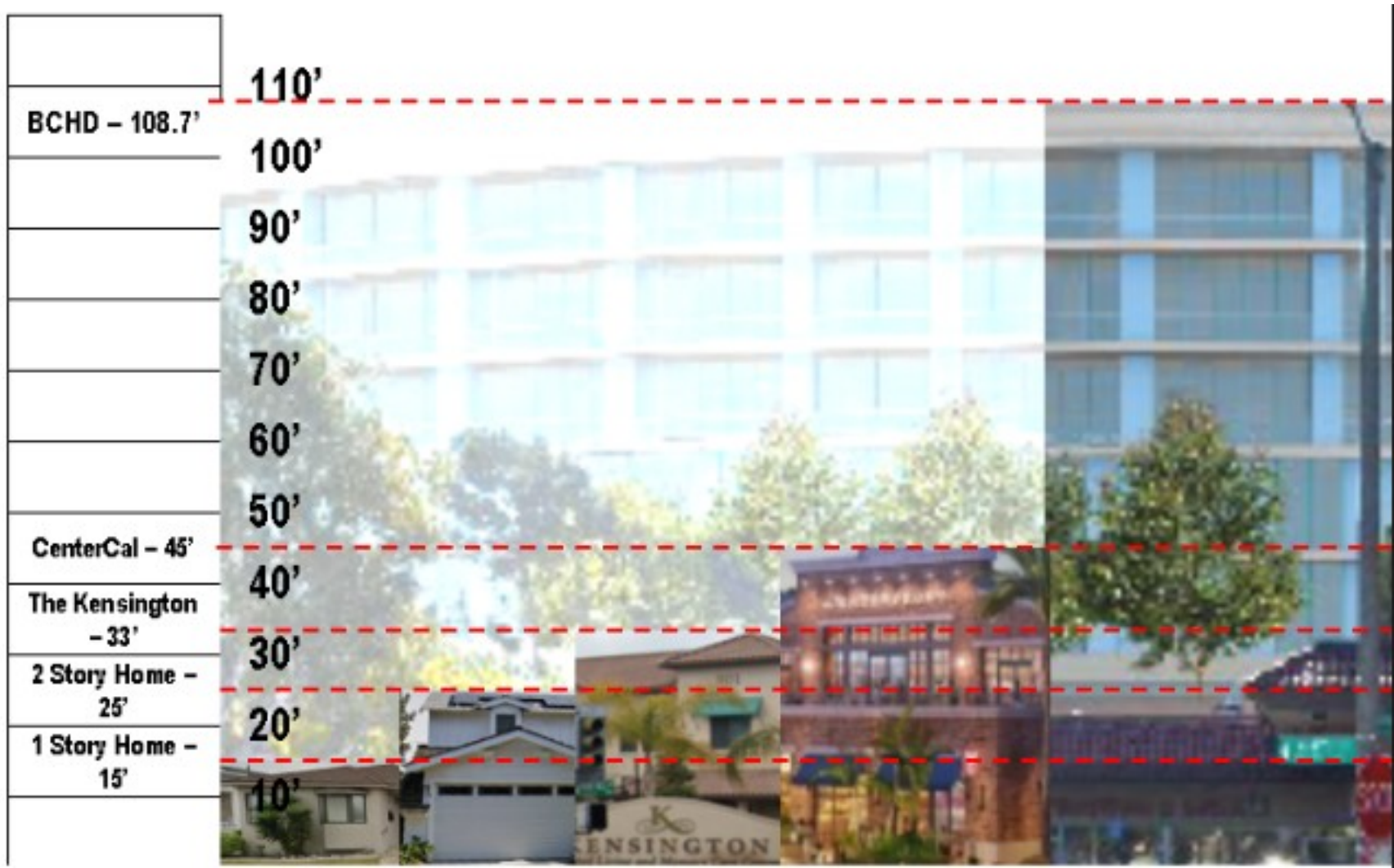
**0.3% @ 76-feet above the interior courtyard**

**99.7% @ 52-feet or LOWER**

# CHARACTER FACTOR

## “Height” (cont’d)

Comparisons of BCHD proposed project to existing homes and other projects, including the voter denied CenterCal Mall-by-the-Sea project.





# CHARACTER FACTOR “Landscape”

**Insufficient information available from BCHD**

# CHARACTER FACTOR

## “Mass”

Curvilinear rectangular solid at approximately 4X the height of the surrounding properties



Mass is a subset of Form (see prior discussion) and is defined by RBMC as “three dimensional forms, the simplest of which are cubes, boxes (or “rectangular solids”), cylinders, pyramids and cones. Buildings are rarely one of these simple forms, but generally are composites of varying types of assets. This composition is generally described as the “massing” of forms in a building.”

The massing of the BCHD commercial design is dominated by cube solids.

Generally rectangular solid



Cube + triangle



Cube + triangle



Rectangular solid + triangle



Typical Redondo Beach and Torrance Neighborhood Mass

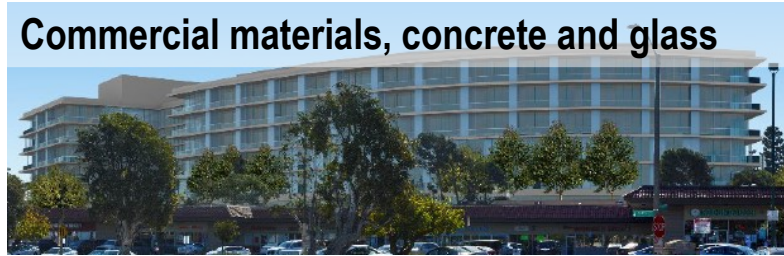
# CHARACTER FACTOR

## “Material”

The Redondo Beach RDGs state “high quality materials that are compatible with the existing neighborhood.” At this time, BCHD asserts it has no design, and this is conceptual only per the self-certified BCHD EIR.

The conceptual design appears 80% glass and 20% concrete.

Commercial materials, concrete and glass



The surrounding existing neighborhoods use average amounts of glass (10-20%) and wood siding or stucco as the dominant materials. The Council approved Kensington is a prime example of use of a southwestern stucco for compatibility with existing neighborhood development.

Residential materials, wood siding and stucco with some brick/stone accent



The Kensington - Residential materials, stucco with pitched tile roofs



The Kensington Materials



**Typical Redondo Beach and Torrance Neighborhood Materials**



# CHARACTER FACTOR

**“New multi-family residential development should respect the development in the immediate area through the use of similar setbacks, complimentary building arrangements, buffer yards and avoidance of overwhelming building scale and visual obstructions.”**



**SETBACKS:** BCHD has moved the setback of the HLC to roughly the edge of the 30-foot high elevated site.

**OVERWHELMING SCALE:** BCHD plans 400-600% taller, 60X to 150X more bulk, and a dominate elevated siting compared to surrounding properties in the immediate area.

**VISUAL OBSTRUCTION:** BCHD's Phase 1 HLC project blocks and additional 1077% of view compared the current failed Hospital building.



**Typical Redondo Beach and Torrance Immediate Neighborhoods**

# CHARACTER FACTOR

## “Roofline”

BCHD’s proposed flat roofline is largely different and inconsistent with most surrounding property. Surrounding property in both Torrance and Redondo Beach is largely consistent with the specific Beryl Heights RDGs and contains relatively low, but pitched roofs.

Flat Roof, dominated by rectangular geometry



The conceptual design appears 80% glass and 20% concrete.

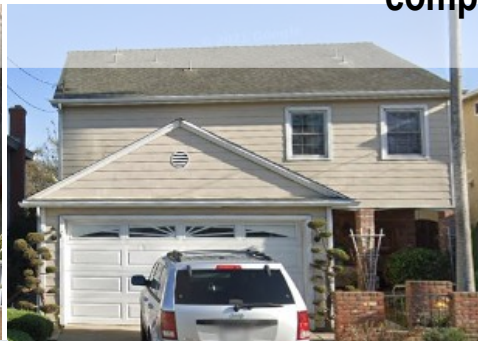
The surrounding existing neighborhoods use average amounts of glass (10-20%) and wood siding or stucco as the dominant materials. The Council approved Kensington is a prime example of use of a southwestern stucco for compatibility with existing neighborhood development.

The Kensington – pitched roofs



The Kensington

Generally pitched roofs



Typical Redondo Beach and Torrance Neighborhood Rooflines



# CHARACTER FACTOR

## “Scale”

RB RDGs define scale as “the general feeling of mass and size of the building as related to that of other buildings.” “Feeling” is an inherently subjective measure. Objective measures include mass and size.

**Mass & Bulk:** BCHD’s proposed Phase 1 is 60-150 times that of the surrounding buildings.

**Height:** BCHD’s proposal is 400% the height of surrounding buildings and visually twice the height of the current BCHD maximum (0.3% of sqft) and visually 300% the 52-foot height below which 99% of BCHD current buildings exist.

**Size:** Phase 1 + Phase 2 are 792,000 sqft, which is larger than all Beryl Heights homes added together.

300,000 sqft, 108.7-feet tall



Under 5,000 sqft, under 25-feet tall



The Kensington – common scale with residential on left of photo



**The Kensington**

**Typical Redondo Beach and Torrance Neighborhood Scale**

# CHARACTER FACTOR

## “Setbacks”

The failed Hospital building was carefully located in the center to the site to minimize its visual mass, scale, bulk, height and other destructive factors to the local neighborhood. That necessitated a deep buffer zone/setback.

By the early 1950s, all of Beryl Heights was built out except for Prospect Ave and north of Beryl St. They pre-existed the District.

By 1965, all of Beryl Heights was built out and pre-existed all subsequent District development, from south tower to 520 commercial office rental.

BCHD's proposal to build 300,000 sqft of Phase 1 on the north and east perimeter and finish the 800,000 sqft Phase 1 + 2 development with buildings on the south and west perimeters fails to provide buffer and setback and thereby dominates neighborhood character.





# CHARACTER FACTOR

## “Size”

**BCHD's Phase 1 proposal is 300,000 sqft. BCHD's Phase 1 + 2 proposal is 800,000 sqft.**

**According to private licensed data from a company also used by BCHD, the average SFD in 90277 is 1712 sqft.**

**BCHD's 800,000 sqft proposed development is 467-times the size of the average surrounding property.**

**BCHD's 300,000 sqft Phase 1 is 175-times the size of the average surrounding property.**

**Using City data, Beryl Heights (all homes combined) is estimated at only 634,000 sqft, or smaller than BCHD's 800,000 sqft development proposal.**



**BCHD 300,000 sqft, 108.7-foot tall**

**The Kensington – 87,000 sqft, 94 units, 120 residents**



**The Kensington**



**Size: 4,700 sqft**



**Size: 2,000 sqft**



**Size: 1,800 sqft**



**Size: 2,200 sqft**

**Typical Redondo Beach and Torrance Neighborhood Property Sizes**



# CHARACTER FACTOR

## “Visual Obstructions”

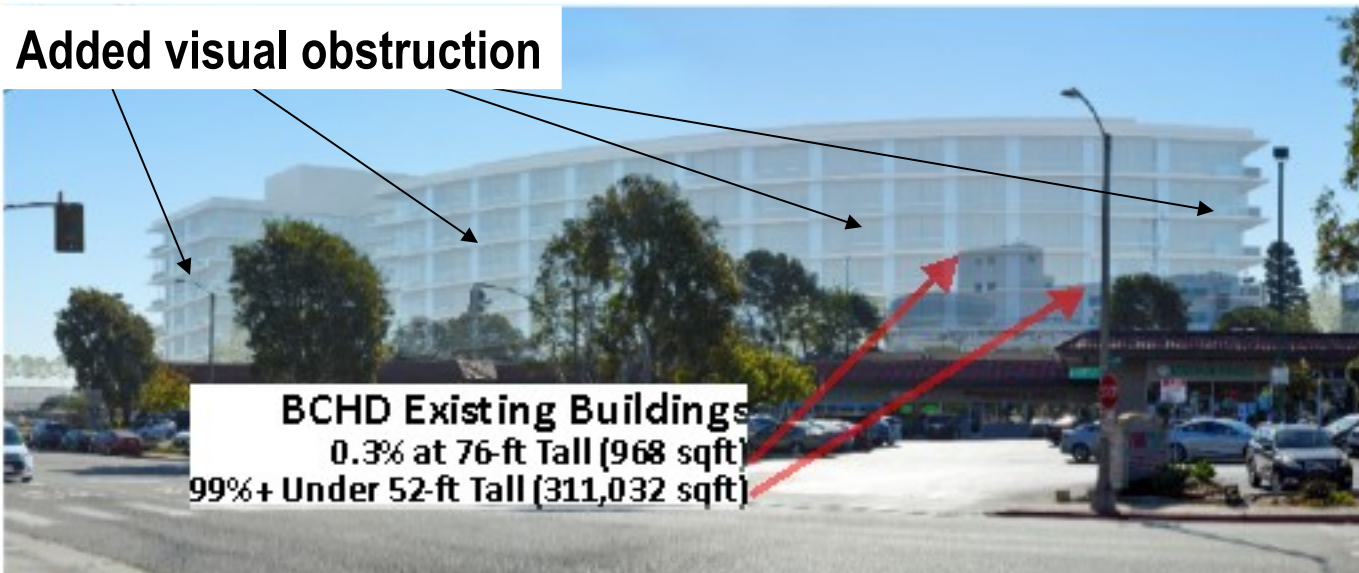
The failed Hospital building was carefully located in the center to the site to minimize its visual obstruction to existing homes and planned residential uses. That necessitated a deep buffer zone/setback.

By the early 1950s, all of Beryl Heights was built out except for Prospect Ave and north of Beryl St. They pre-existed the District.

By 1965, all of Beryl Heights was built out and pre-existed all subsequent District development, from south tower to 520 commercial office rental.

**VISUAL OBSTRUCTION:** BCHD's Phase 1 HLC project blocks and additional 1077% of view compared the current failed Hospital building.

BCHD's Phase 2 is currently unknown, however, the 8-10 story parking ramp is directly above Diamond St and Tomlee area properties, while pavilion will block the entire landscape across Prospect Ave from Beryl Heights. It is unclear what the BCHD power generator and fossil fuel storage impacts will be to local property.



# CHARACTER FACTOR

## “Volume”



**BCHD Courtyard View Volume 3.2M cuft, Beryl St View Bulk 4.4M cuft**



**Beryl St MFD 47,000 cuft**



**Diamond St SFD 19,000 cuft**



**Prospect Ave SFD 18,000 cuft**



**Tomlee Ave SFD 22,000 cuft**

**Volume is not defined in RBMC or other RB documents.**

**The mathematical definition of volume is  $L \times W \times H$ , the same as the bulk definition in RB.**



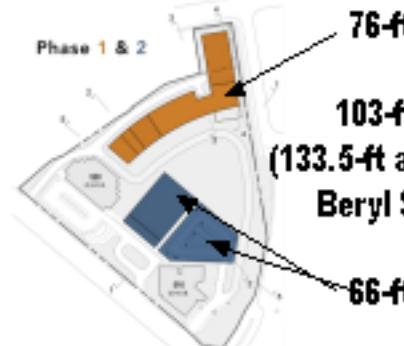

**BCHD Phase 1 has significantly more volume than other neighborhood structures and is conservatively 60 to 150 times the volume of surrounding structures.**

**BCHD Phase 1 and 2 will have more sqft and taller, commercial floor height, therefore, BCHD's full build out will have 20-40% more volume than all Beryl Heights homes together.**

**Typical Redondo Beach and Torrance Neighborhood Volumes**

**Analysis of BCHD's Phase 2 HLC Project's Non-compliance with Redondo Beach Municipal Code and Residential Design Guidelines:  
"Phase 2 Character"**

# BCHD Bait & Switch: Moving Neighborhood Damages to Phase 2

2017	2019	2020	2021
COMMITMENT TO BUFFER NEIGHBORHOODS	NO BUFFER GREAT WALL OF REDONDO DESIGN	ADDED A 10-STORY RAMP/INCREASED HEIGHT	INCREASED HEIGHT OVER 40% w/o PUBLIC INPUT
<p>Healthy Living Campus Parking Approach</p>  <p>CONCEPT</p> <p>Parking</p> <p>Core</p> <p>Campus Edge</p> <p>BCHD Health District</p>	 <p>Plan</p>	 <p>Phase 1 &amp; 2</p> <p>76-ft</p> <p>103-ft (133.5-ft above Beryl St)</p> <p>66-ft</p>	 <p>Phase 1 &amp; 2</p> <p>76-ft</p> <p>103-ft (133.5-ft above Beryl St)</p> <p>66-ft</p>
<p>In the May 2017 CWG Meeting, BCHD acknowledged the upcoming negative impacts on surrounding neighborhoods from development and presented their commitment to protect using buffer space</p>	<p>In the June 2019 EIR Notice, BCHD presented the 60-foot tall, built around the edges of the site "Great Wall of Redondo." It contained 160,000 sqft underground parking and about 700,000 sqft of surface buildings</p>	<p>In June 2020, BCHD gave the public only 3 business days notice of the new design before BCHD approved a 76-foot tall, about 800,000 sqft of surface buildings design including an 8-10 story parking ramp</p>	<p>In March 2021 in the Draft EIR, BCHD blindsided the public with the same design but 103-feet tall (133-1/2-feet above Beryl St.) Clearly a disingenuous negotiating ploy, BCHD ultimately reduced it to 83-feet (108.7-feet above Beryl St.)</p>



# BCHD Bait & Switch: Moving Neighborhood Damages to Phase 2 (cont'd)

## 2019

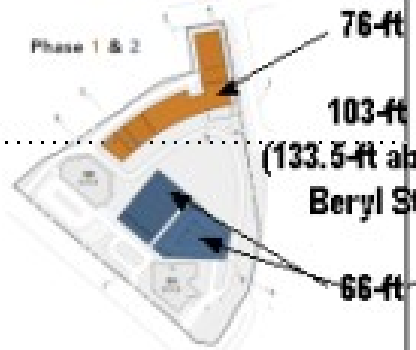
**NO BUFFER GREAT WALL OF REDONDO DESIGN**



In the June 2019 EIR Notice, BCHD presented the 60-foot tall, built around the edges of the site "Great Wall of Redondo." It contained 160,000 sqft underground parking and about 700,000 sqft of surface buildings

## 2020

**ADDED A 10-STORY RAMP/INCREASED HEIGHT**



In June 2020, BCHD gave the public only 3 business days notice of the new design before BCHD approved a 10-foot tall, about 800,000 sqft of surface buildings design including an 8-10 story parking ramp

In an apparent attempt to hide its damages to neighborhoods on the south and west of the site, BCHD bifurcated its plan between 2019 and 2020.

-BCHD increased the amount of surface building square feet by moving 160,000 sqft of underground parking to an 8-10 story ramp on the south side of campus.

-Any decisions regarding Phase 1 **MUST CONSIDER** the impacts of the parking ramp, since BCHD has now forgone the option of underground parking in Phase 1.

# BCHD Bait & Switch: Moving Neighborhood Damages to Phase 2 (cont'd)

When BCHD removed Phase 2 from its active planning, it denied the Residents surrounding the project any opportunity to visualize the damages of:

- an 8-10 story parking ramp at Prospect and Diamond on an elevated site
- a 4-story, up to 83-foot building spanning the distance from what is now the 510 N Prospect Commercial Office Building (COB) to the 520 N Prospect COB
- BCHD's proposed Phase 2 will project 24/7/365 noise, headlights, slamming doors, talking, and emissions into neighborhoods and at the same time will further devastate privacy with its elevated position

Because information on Phase 2 is scarce, modeling was completed with Google Earth Pro using best available information and the analysis of the damages by BCHD are illustrative.

# BCHD Phase 2: What Little Has Been Disclosed

BCHD has minimized the release of Phase 2 data and drawings. Here is the general overview.





# BCHD Phase 2: Modeled Views

Phase 2 will have substantial elevation and privacy impacts for Torrance residents due to the 8-10 story ramp and the elevated site.





# BCHD Phase 2: Modeled Views (cont'd)

Phase 2 will have substantial elevation and privacy impacts for Beryl Heights residents due to the 8-10 story ramp and the pavilion.



North of Beryl St.

Beach Cities Health District

Torrance  
Pacific South Bay

4-Story Pavilion (66-ft, 90,250 sqft)  
8-10 Story Parking Ramp  
(66-ft, 292,500 sqft)  
Phase 1 + 2 = 792,520 sqft

Beryl Heights

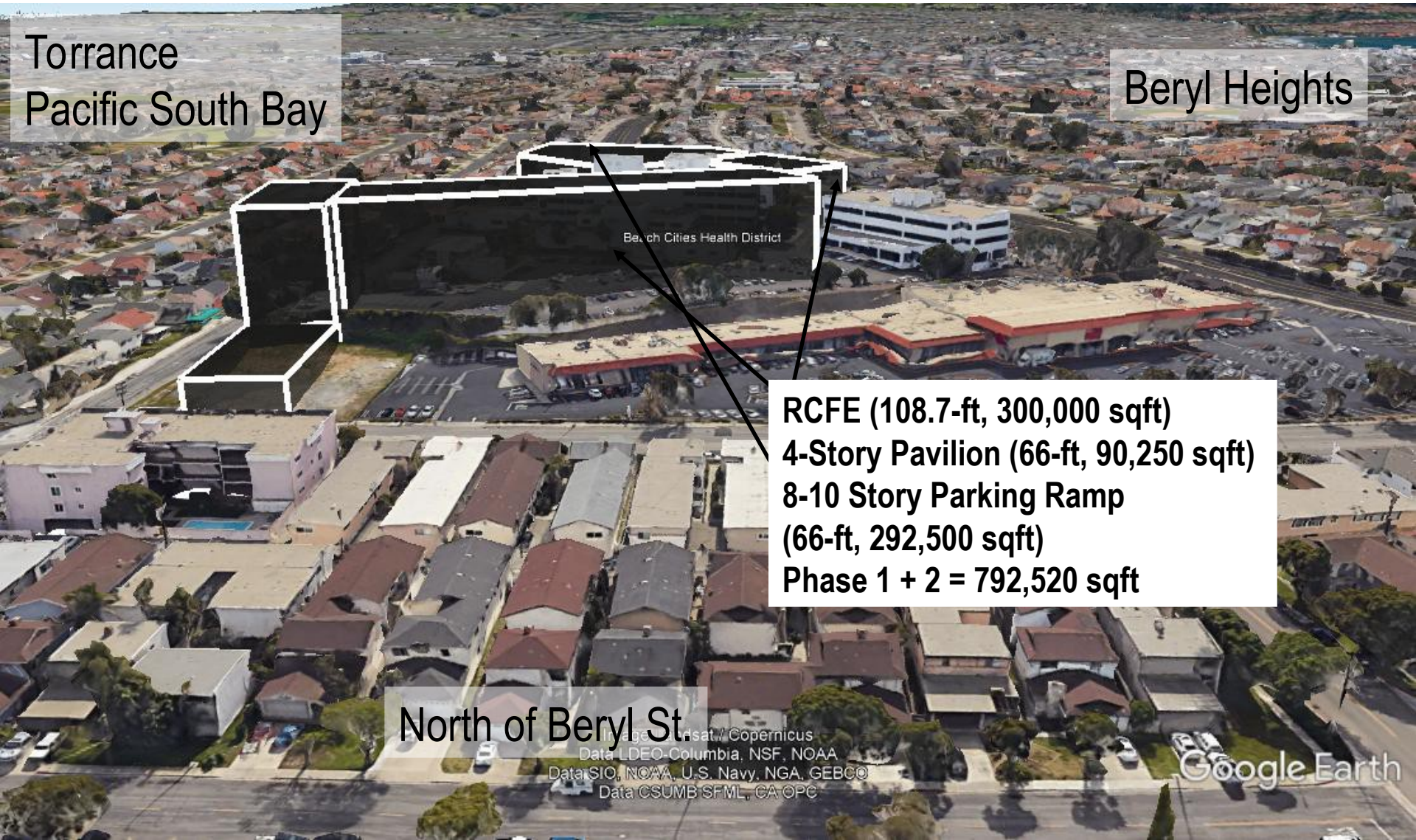
Image Landsat / Copernicus

Google Earth



# BCHD Phase 1: Modeled Views

For completeness, this is the view of the RCFE (108'-8", 300,000 sqft) from north of Beryl St.



Torrance  
Pacific South Bay

Beryl Heights

Beach Cities Health District

**RCFE (108.7-ft, 300,000 sqft)**  
**4-Story Pavilion (66-ft, 90,250 sqft)**  
**8-10 Story Parking Ramp**  
**(66-ft, 292,500 sqft)**  
**Phase 1 + 2 = 792,520 sqft**

North of Beryl St

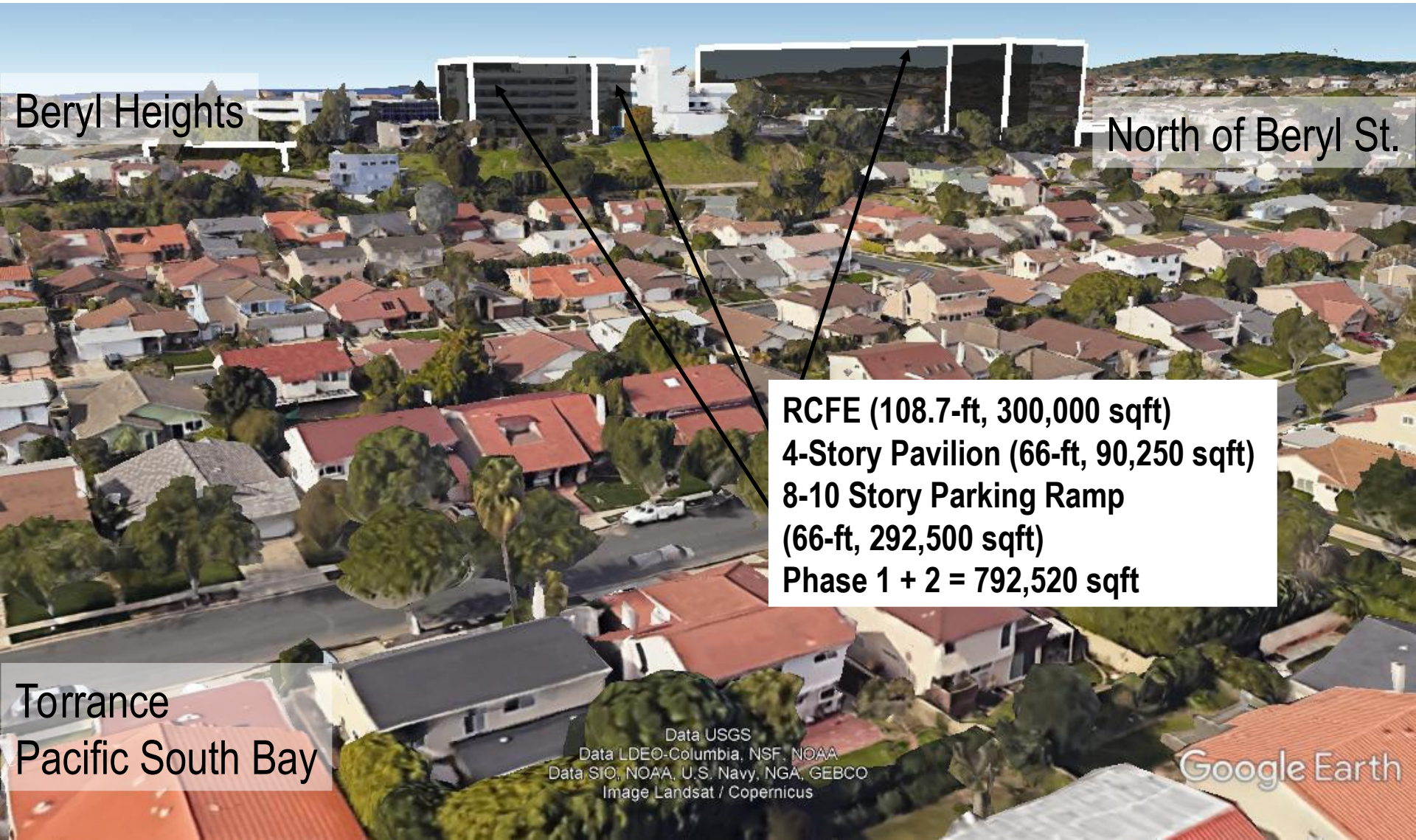
Image: Landsat / Copernicus  
Data: LDEO-Columbia, NSF, NOAA  
Data: SIO, NOAA, U.S. Navy, NGA, GEBCO  
Data: CSUMB-SFML, CA-OPC

Google Earth



# BCHD Phase 1: Modeled Views (Cont'd)

For completeness, this is the view of the proposed Phase 1 + 2 from Torrance Pacific South Bay



Beryl Heights

North of Beryl St.

**RCFE (108.7-ft, 300,000 sqft)**  
**4-Story Pavilion (66-ft, 90,250 sqft)**  
**8-10 Story Parking Ramp**  
**(66-ft, 292,500 sqft)**  
**Phase 1 + 2 = 792,520 sqft**

Torrance  
Pacific South Bay

Data USGS  
Data LDEO-Columbia, NSF, NOAA  
Data SIO, NOAA, U.S. Navy, NGA, GEBCO  
Image Landsat / Copernicus

Google Earth

# CHARACTER FACTORS

## Based on Redondo Beach Municipal Code and Residential Design Guidelines Applicable to the Planning Commission Design Review and Conditional Use Permitting

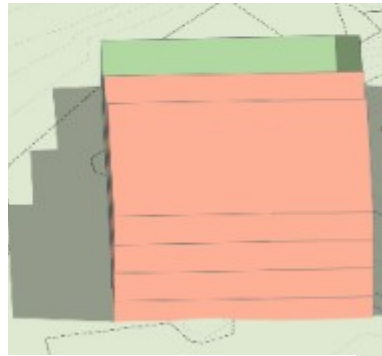
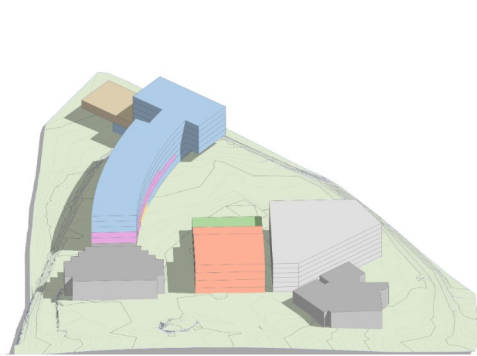
Character Factor	Source
All new multi-family developments should be compatible with the character of the neighborhood	RB RDG
Architecture	RB RDG
Bulk	RB RDG
Form	RB RDG
Height	RBMC 10-2.1320
Landscape	RBMC 10-2.1320
Mass	RB RDG
Material	RB RDG
New multi-family residential development should respect the development in the immediate area through the use of similar setbacks, complimentary building arrangements, buffer yards and avoidance of overwhelming building scale and visual obstructions.	RB RDG
Roofline	RBMC 10-2.1320, RB RDG
Scale	RB RDG
Setbacks	RBMC 10-2.1320, RB RDG
Size	RB RDG
Visual Obstructions	RB RDG
Volume	RBMC 10-2.1320

RB RDG – Redondo Beach Residential Design Guidelines  
RBMC – Redondo Beach Municipal Code

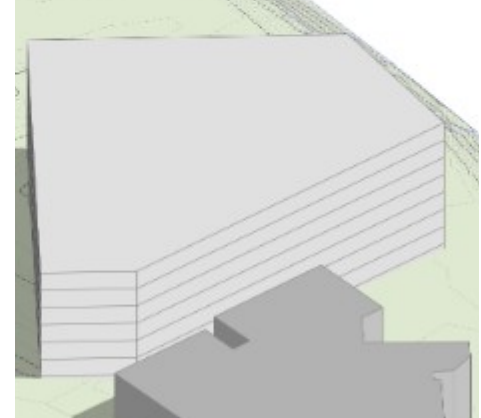
Both RBMC and the RDG are required compliance in the Planning Commission Design Review process (RB PCDR). The listed Character Factors are extracted from the Redondo Beach government sources as listed, and are evaluated on the following slides, demonstrating that the proposed BCHD Phase 1, 108'-8", 300,000 sqft building fails compliance. Further, Phase 2 also fails with a total of 800,000 sqft, about 30% larger than all Beryl Heights homes added together.

# CHARACTER FACTOR SUMMARY

Since much less is known about Phase 2, however, Phase 1 will require the invasive parking structure in Phase 2 and therefore a review of Phase 2 is required to avoid piecemealing prior to Phase 1 permitting.



**4-Story Pavilion**  
Height – 66-ft  
Size – 90,250 sqft  
Bulk – 1.4M cuft



**8-10 Story Parking Ramp**  
Height – 66-feet  
Size – 292,500 sqft  
Bulk – 2.3M cuft

## **Beryl Heights Neighborhood**

**Max Height – 30-ft**  
**Avg Height – under 24-ft**  
**Avg Size – 1,712 sqft**  
**Avg Bulk – under 20,000 cuft**  
**Total Size – 634,000 sqft**



# CHARACTER FACTOR

## “Height”

### Tallest buildings in Redondo Beach

Here you see the 20 tallest buildings of [Redondo Beach](#). This list only regards multi-story buildings.

#	Building	City	Floors	Height	Year
1	 Ocean Plaza	<a href="#">Redondo Beach</a>	10	≈121 ft	1974
2	 Delphi Apartments	<a href="#">Redondo Beach</a>	9	≈109 ft	1973
3	 Apartments at King Harbor	<a href="#">Redondo Beach</a>	6	≈73 ft	1973
4	 230 South Catalina Avenue	<a href="#">Redondo Beach</a>	6	≈73 ft	1974
5	 510-520 The Village	<a href="#">Redondo Beach</a>	6	≈73 ft	1980
6	 140 The Village	<a href="#">Redondo Beach</a>	6	≈73 ft	1980
7	 130 The Village	<a href="#">Redondo Beach</a>	6	≈73 ft	1980
8	 120 The Village	<a href="#">Redondo Beach</a>	6	≈73 ft	1980
9	 110 The Village	<a href="#">Redondo Beach</a>	6	≈73 ft	1980
10	 200 South Catalina Avenue	<a href="#">Redondo Beach</a>	6	≈73 ft	1972
11	 The Sand Castle	<a href="#">Redondo Beach</a>	6	≈73 ft	1971
12	 Seaview Apartments	<a href="#">Redondo Beach</a>	5	≈61 ft	1969
13	 Crowne Plaza Redondo Beach & Marina	<a href="#">Redondo Beach</a>	5	≈61 ft	1987
14	 250 The Village	<a href="#">Redondo Beach</a>	4	≈49 ft	1978
15	 240 The Village	<a href="#">Redondo Beach</a>	4	≈49 ft	1978
16	 230 The Village	<a href="#">Redondo Beach</a>	4	≈49 ft	1978
17	 220 The Village	<a href="#">Redondo Beach</a>	4	≈49 ft	1978
18	 210 The Village	<a href="#">Redondo Beach</a>	4	≈49 ft	1978
19	 Casa de Los Amigos	<a href="#">Redondo Beach</a>	4	≈49 ft	1977

**At 66-feet tall, BCHD parking structure and pavilion would become the 12<sup>th</sup> and 13<sup>th</sup> tallest buildings in the City and the tallest built since 1980 (over 40 years)**

<https://www.emporis.com/statistics/tallest-buildings/city/113158/redondo-beach-ca-usa>

# CHARACTER FACTOR

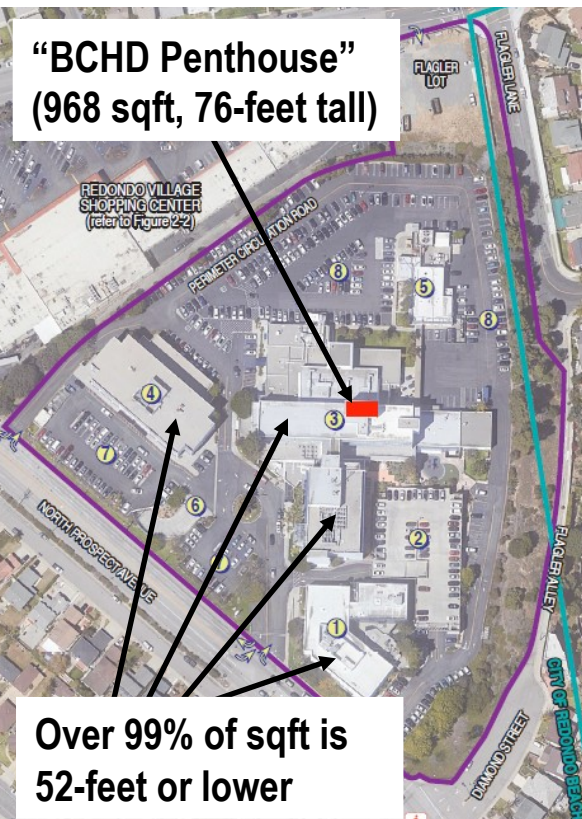
## “Height” (cont’d)

Phase 1: BCHD increased the floorspace at maximum height from less than 1,000 sqft of buildings to approximately 300,000 sqft – a 300X increase.

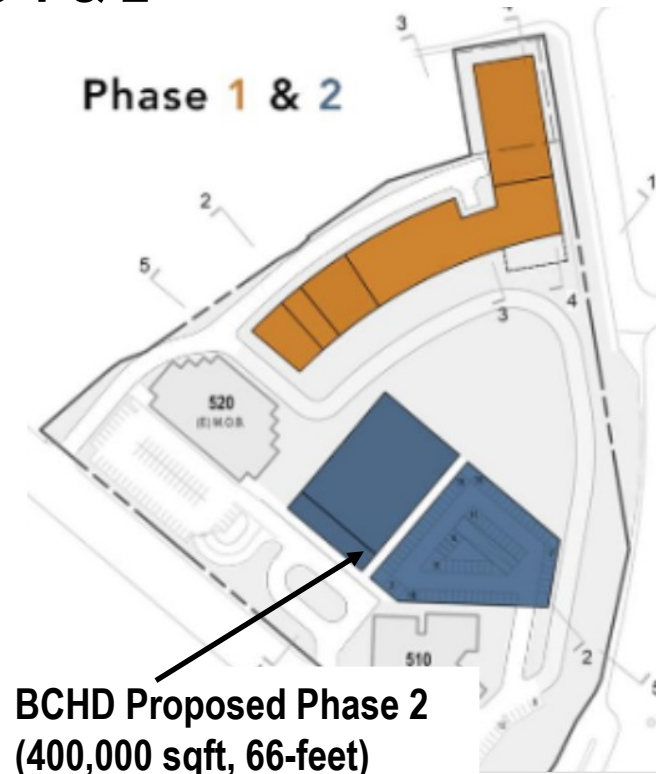
BCHD also relocated the maximum height from the visually minimized center of campus to the visually maximized perimeter at site’s edge.

Phase 2: (shown in blue) BCHD also relocated maximum heights to south and west homes from current “BCHD Penthouse” visually minimizing center location.

### As-Is



### Proposed Phase 1 & 2





# CHARACTER FACTOR

## “Setbacks”

The failed Hospital building was carefully located in the center to the site to minimize its visual mass, scale, bulk, height and other destructive factors to the local neighborhood. That necessitated a deep buffer zone/setback.

By the early 1950s, all of Beryl Heights was built out except for Prospect Ave and north of Beryl St. They pre-existed the District.

By 1965, all of Beryl Heights was built out and pre-existed all subsequent District development, from south tower to 520 commercial office rental.

BCHD's proposal to build 400,000 sqft of Phase 2 on the south and west perimeter fails to provide buffer and setback and thereby dominates neighborhood character.



**Analysis of BCHD's Phase 1 HLC Commercial  
Developer/Owner/Operator Project  
RBMC 10-2.2506 Conditional Use Permit  
Compliance:  
“Miscellaneous Features/Factors”**

# Many of the Relevant Factors to CUP Issuance Analysis and Modifications are Presented in the “Character” Document

There is a very significant overlap between the components of Character and the Chapter 2 features listed for incorporation into evaluation and adjustment in 10-2.2506 CUP (b)(1). Below are the components of Character specifically extracted from various RBMC and RB RDG sources.

Character Factor	Source
All new multi-family developments should be compatible with the character of the neighborhood	RB RDG
Architecture	RB RDG
Bulk	RB RDG
Form	RB RDG
Height	RBMC 10-2.1320
Landscape	RBMC 10-2.1320
Mass	RB RDG
Material	RB RDG
New multi-family residential development should respect the development in the immediate area through the use of similar setbacks, complimentary building arrangements, buffer yards and avoidance of overwhelming building scale and visual obstructions.	RB RDG
Roofline	RBMC 10-2.1320, RB RDG
Scale	RB RDG
Setbacks	RBMC 10-2.1320, RB RDG
Size	RB RDG
Visual Obstructions	RB RDG
Volume	RBMC 10-2.1320

The components of Character in the table. Issuance of a CUP that protects no adverse effects on surrounding uses and properties will need to analyze, evaluate, and make specific modifications to most, if not all of the BCHD Phase 1 proposal for its Commercial Developer/Owner/Operator that it plans to lease approximately 3.2 acres of P-CF to. BCHD will not be the developer, owner or operator.

# Review of Other Effects, Features, and Factors are Provided in this Phase 1 “Miscellaneous Features/Factors” Report

Additional effects and features for analysis, evaluation and modification orders pursuant to the CUP are listed below. They are extracted from the 10-2.2506 and “other features required by this chapter [Chapter 2]”.

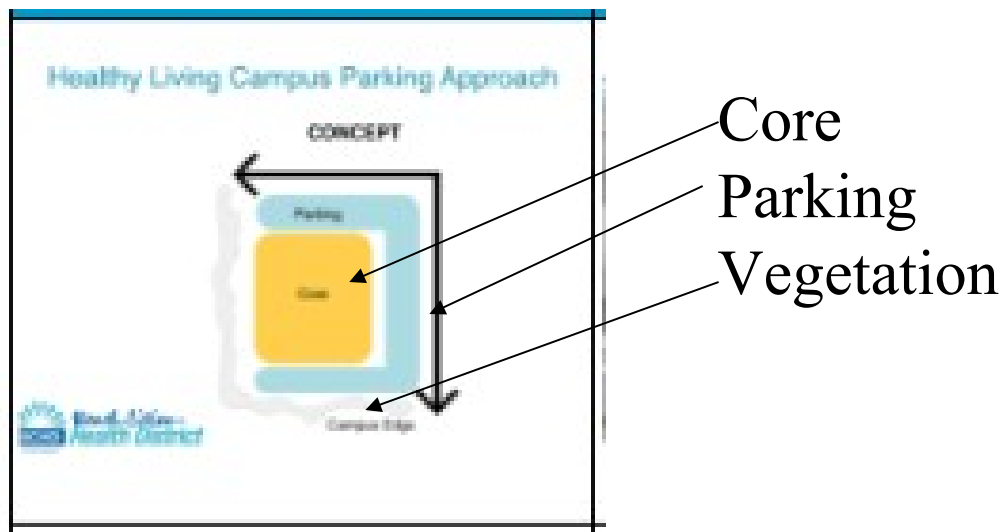
<b>Feature/Effect</b>	<b>Source</b>
Open spaces and buffers	10-2.2506(b)
Fences and walls	10-2.2506(b)
Streets, service roads, alleys	10-2.2506(b)
Ingress, egress, circulation	10-2.2506(b)
Signage	10-2.2506(b)
Landscaping	10-2.2506(b)
Noise, vibration, odor, and like	10-2.2506(b)
Off street loading	10-2.2506(b)
Maximum development time	10-2.2506(b)
Hours of operation	10-2.2506(b)
Respect for natural terrain	10-2.2502(b)
Utilities	10-2.2502(b)
Private open space	10-2.2502(b)
Security	10-2.2502(b)
Crime deterrence	10-2.2502(b)
General design concerns	10-2.2502(b)
Other conditions as needed	10-2.2502(b)
Protection of property values	10-2.2502(a)

To the extent that documents are available for analysis, comments on the features in the table are provided in the “CUP Miscellaneous” document.

# Open Space and Buffer

In 2017 at the Community Working Group, BCHD acknowledged the damage its plan would cause to surrounding neighborhoods and committed to a general design concept moving forward of a buffer zone. The buffer would consist of surface parking and vegetation as shown in the May 2017 BCHD slide below.

BCHD's Phase 1 plan provides no buffer and places a 108'-8" building along the north and east perimeter and a 2-4MW generator, up to 75,000 gallons of diesel fuel, and various other toxic and danger equipment along Diamond St under 100-feet from properties.





# Open Space and Buffer

The proposed Phase 1 and Phase 2 plans without buffer from their 100-foot height advantage of balconies, parking floors, and rooftop gathering areas.

## **No buffer (Phase 1)**

108'-8"

300,000 sqft

## **No buffer (Phase 1)**

16,000 V transformer

4,000 V transformer

4,000 V switching

Up to 4,000 kW diesel generator (locomotive sized)

Up to 75,000 gallons diesel fuel in above ground tanks

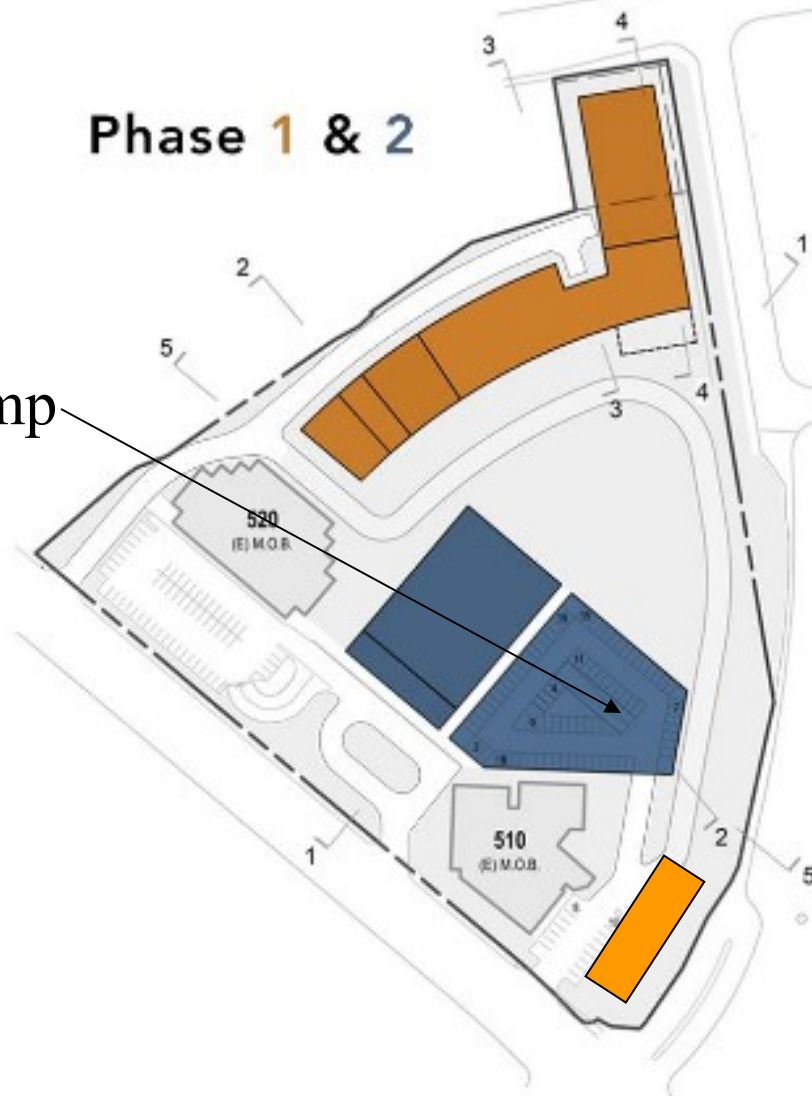


# Open Space and Buffer

The proposed Phase 1 and Phase 2 plans without buffer from their 100-foot height advantage of balconies, parking floors, and rooftop gathering areas.

## **No buffer (Phase 2)**

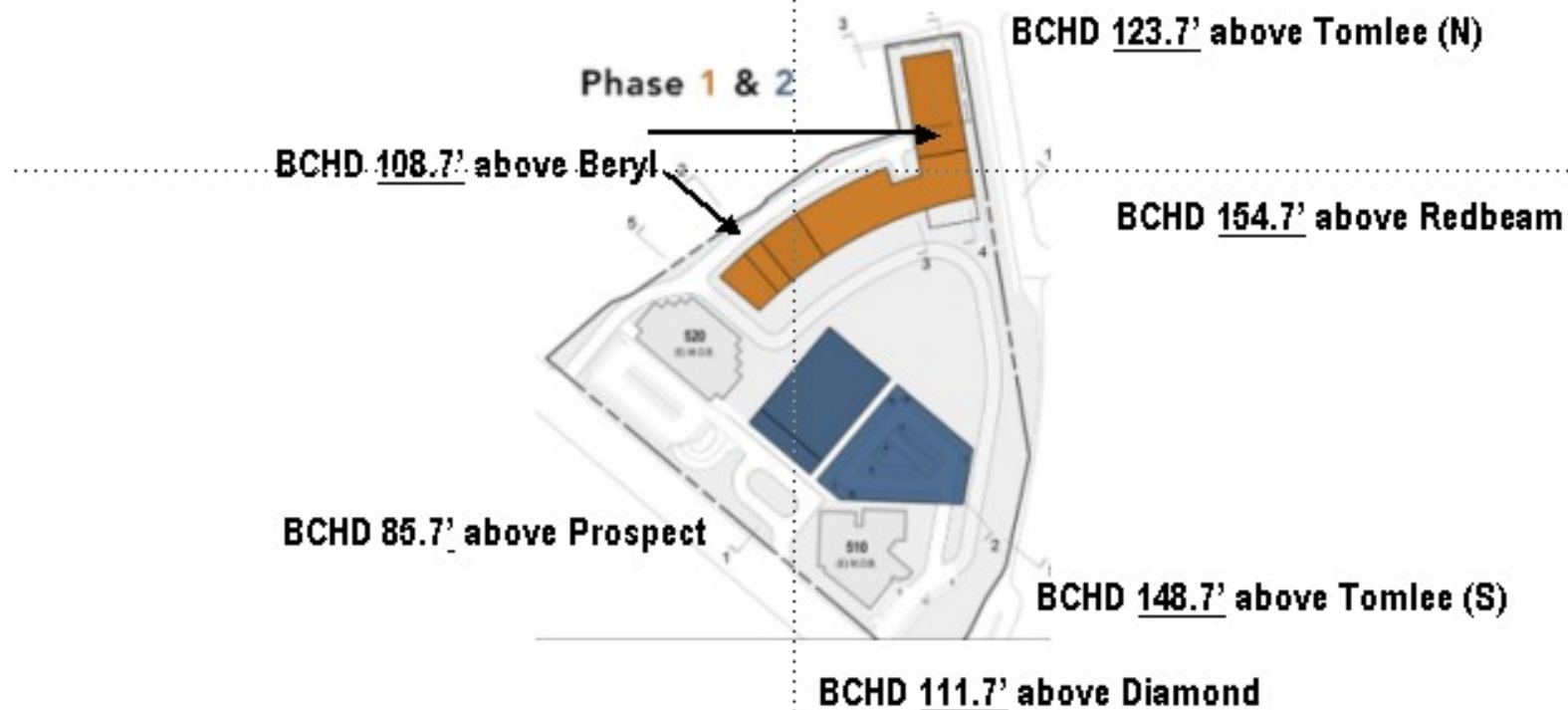
8-10 story parking ramp  
300,000 sqft



# Open Space and Buffer

To provide adequate buffer space from adverse effects, tall construction must be limited to the center of the site, as the tallest Hospital point was. There is a significant elevation difference between the site and surrounding properties.

**The BCHD Proposed commercial development is over 150-feet taller than some surrounding neighborhoods.**



## Insufficient BCHD Plan Information

## Streets, Service Roads, Alleys

Service Roads – the third-party commercial Developer/Owner/Operator will have a 65-99 year lease that will require materials, emergency transport, remodeling, people moving, etc. The plan is inadequate.

Fuel Oil Transport – if BCHD has its expected maximum of 75,000 gallons of fuel to power its 4MW backup generators, approximately 20 tanker trucks will be required every 6 months to pump the tanks dry and refill with fresh fuel. The plan is inadequate.



## Ingress, Egress, Circulation

Construction – the plan is inadequate to fully understand how 10,000+ truckloads will ingress and egress without major disruption to surrounding uses.

Parking Structure – the 800 vehicle, 8-10 story parking ramp at Prospect and Diamond will both ingress and egress onto Prospect. As a 24/7365 structure, the access, noise, headlights, emissions, particulates, etc. are ill defined in the plan.

# Signage

Lighted signage must be fully prohibited. For decades the neighborhoods have attempted to extinguish the brightly lit signs that cause excessive nighttime lighting and the associated health damages.

Insufficient BCHD final plan information

## Noise, Vibration, Odor

Noise, Vibration: Power plant – BCHD plans 2-4MW of diesel generation that is currently in the center of the campus to be moved to Diamond street. It will require monthly testing and will be run as needed. The power plants are loud and vibrate the ground. They are roughly the size of diesel locomotives.

Odor: Diesel fuel. BCHD's up to 75,000 gallons of diesel will be fill, sucked dry before fuel spoilage, and refilled on a bi-annual basis. In addition, tank venting will also create odors in the adjoining uses and neighborhoods.

## Noise, Vibration, Odor

Employees, patients, visitors, supplies, etc. all require off street loading.  
The current plan insufficient, especially for construction



## Maximum Development Time

BCHD has asserted that Phase 1 will be less than 2-1/2 years development time. That must become a permit limitation to protect the neighborhoods in case BCHD has made false claims about timing.

## Hours of Operation

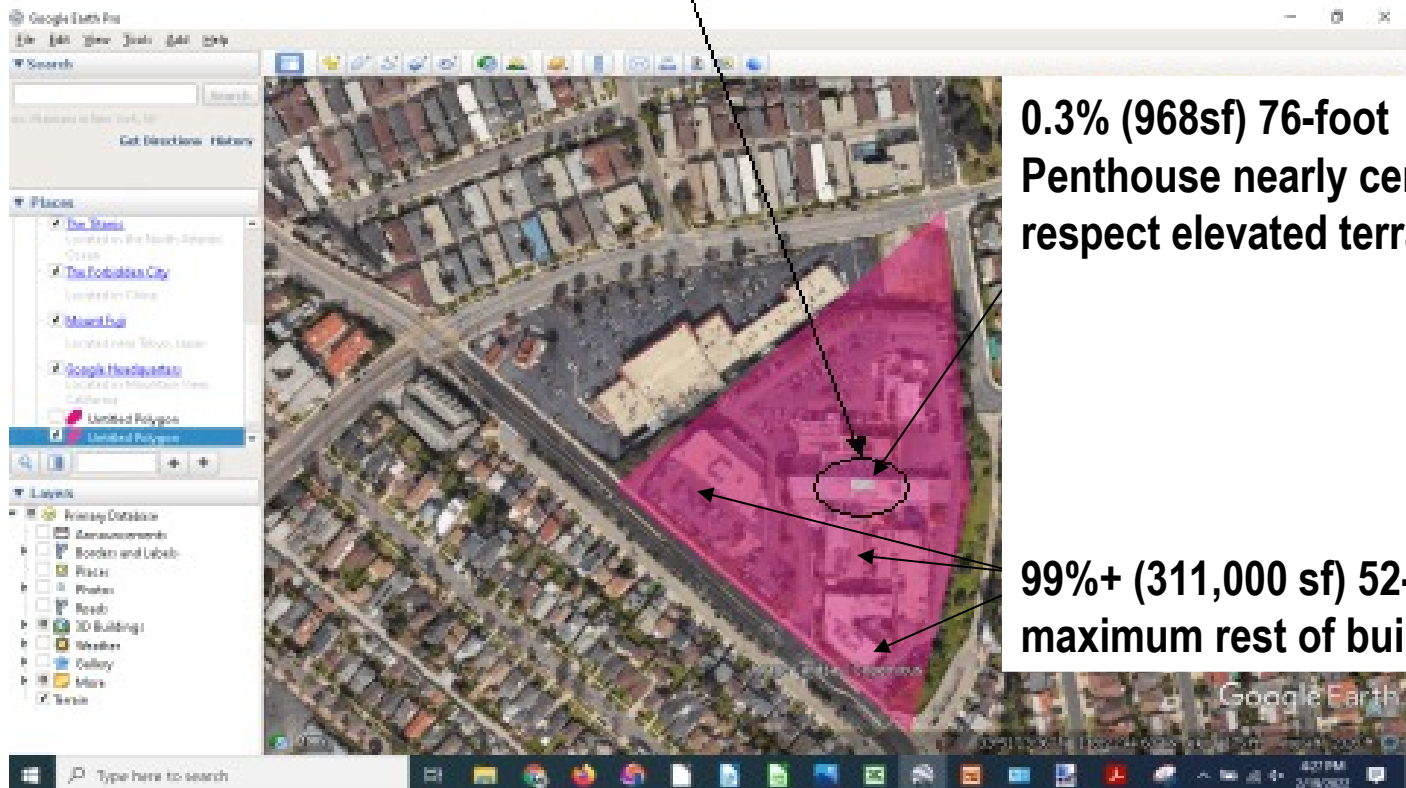
BCHD is claiming that it can operate amplified sound outdoors until 10PM. BCHD is in the midst of all residential neighborhoods and must curtail outdoor amplified noise by 7PM to avoid adverse impacts from its concrete cliffs and canyons on the campus.

# Respect for Natural Terrain: SBH “Centered”

South Bay Hospital was built nearly in the center of the 30-foot tall elevated site. At the time the hospital was built, all of Beryl Heights was built out except for Prospect and north of Beryl.

## **ONLY 968 SQFT OF BCHD IS 76-FEET TALL**

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.



# Respect for Natural Terrain: SBH “Centered”

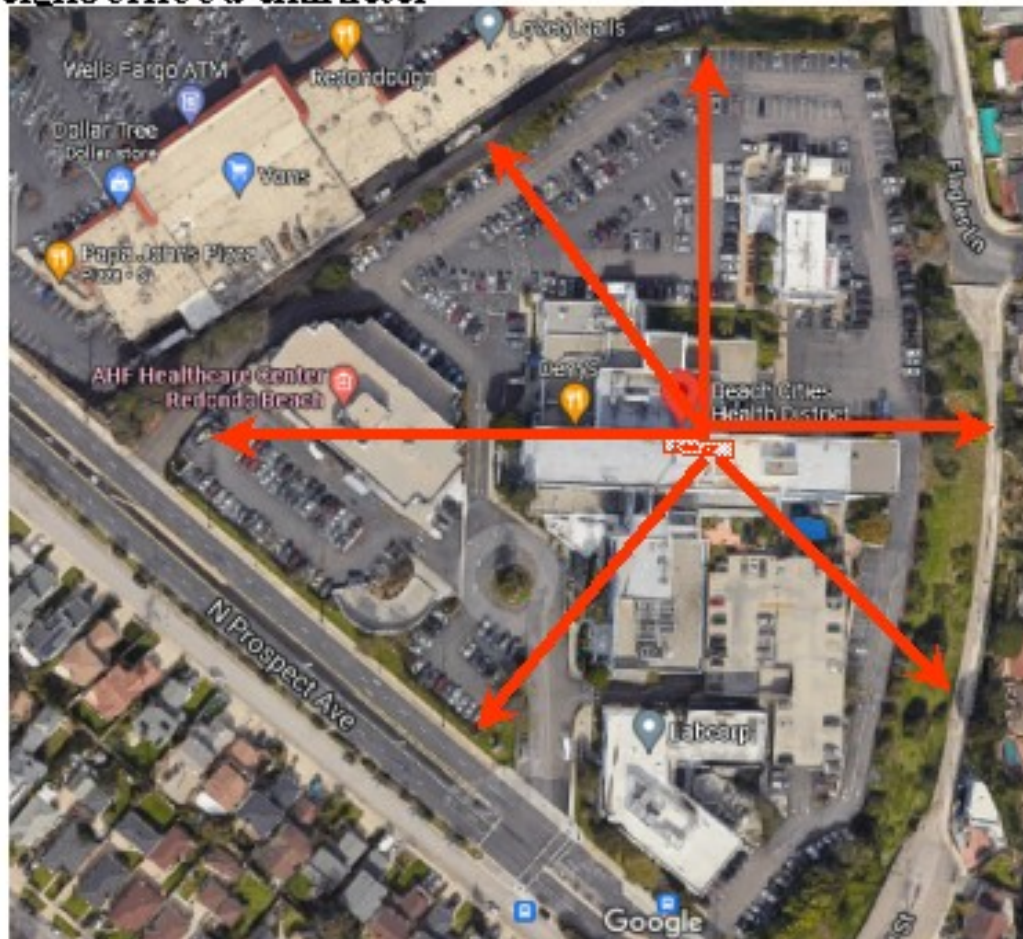
## Current South Bay Hospital 0.3% 76-foot Maximum Height Location Review

The 968 sqft “penthouse” is roughly centered in the triangular lot

Large setbacks of the maximum height reduce visual impact

Large setbacks of the largest buildings reduce 312,000 sqft mass impacts

Large setbacks hide the inconsistent architecture from the surrounding neighborhoods and shield the neighborhood character



# Respect for Natural Terrain: SBH “Max Height Minimized”

Below is an example of how SBHD minimized the use of excessive height and kept the vast majority of the elevated campus out of sight by building in the center of the site, compared to BCHD’s plan to dominate the skyline and impact surrounding property values and uses.

South Bay Hospital Building (failed 1984 and renamed to BCHD)

76-feet tall = 968 sq-ft

52-feet and under = 311,000 sq-ft

30-feet = average height of all 312,000 sf



**Visual comparison of BCHD proposed vs. existing building heights. Over 99% of the existing hospital is visually shorter than 2<sup>nd</sup> floor of the proposed, site perimeter compound**



BCHD Proposal  
108.7-feet above Beryl St  
83-feet above the interior courtyard

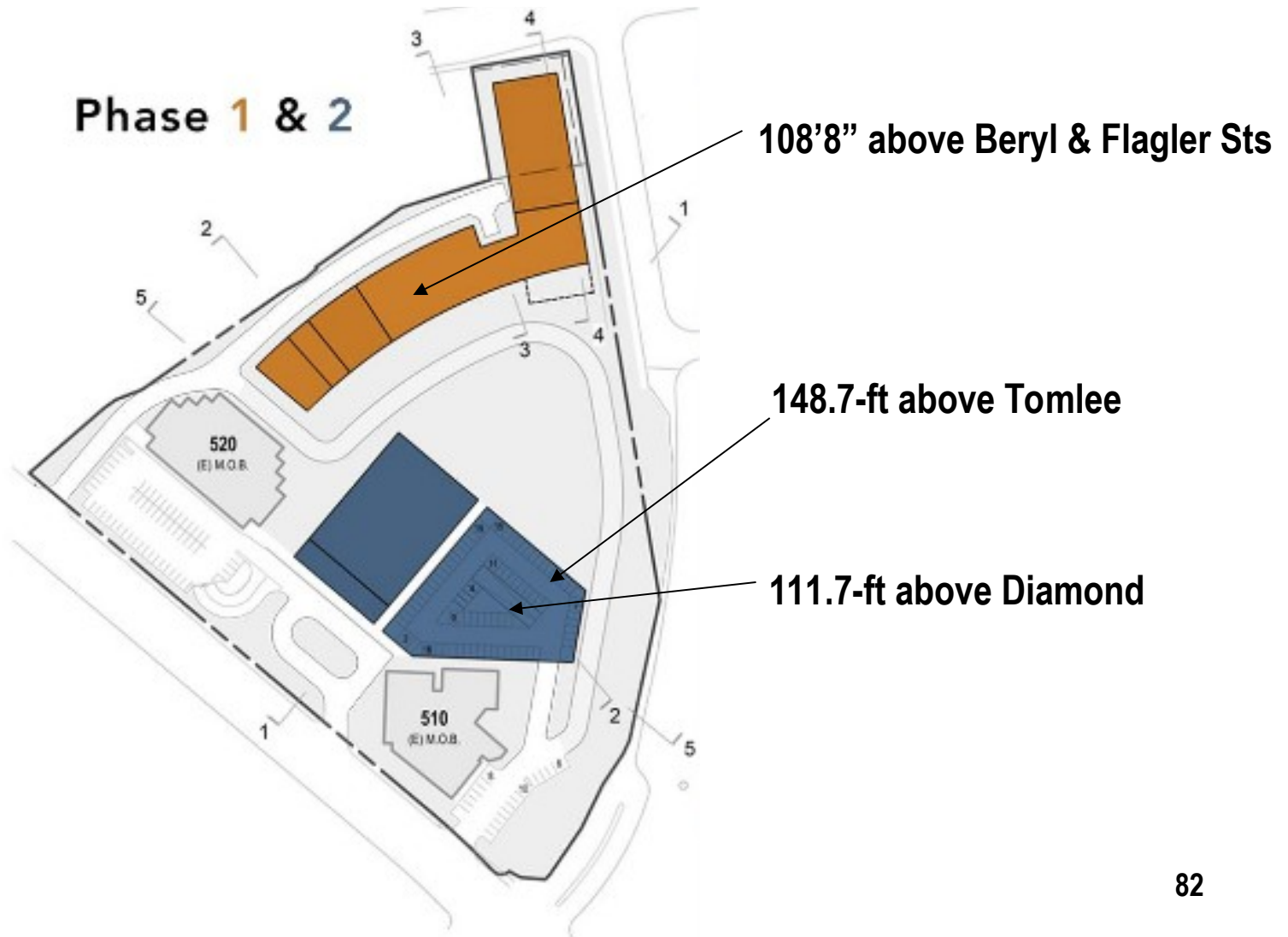


Hospital  
0.3% @ 76-feet above the interior courtyard  
99.7% @ 52-feet or LOWER



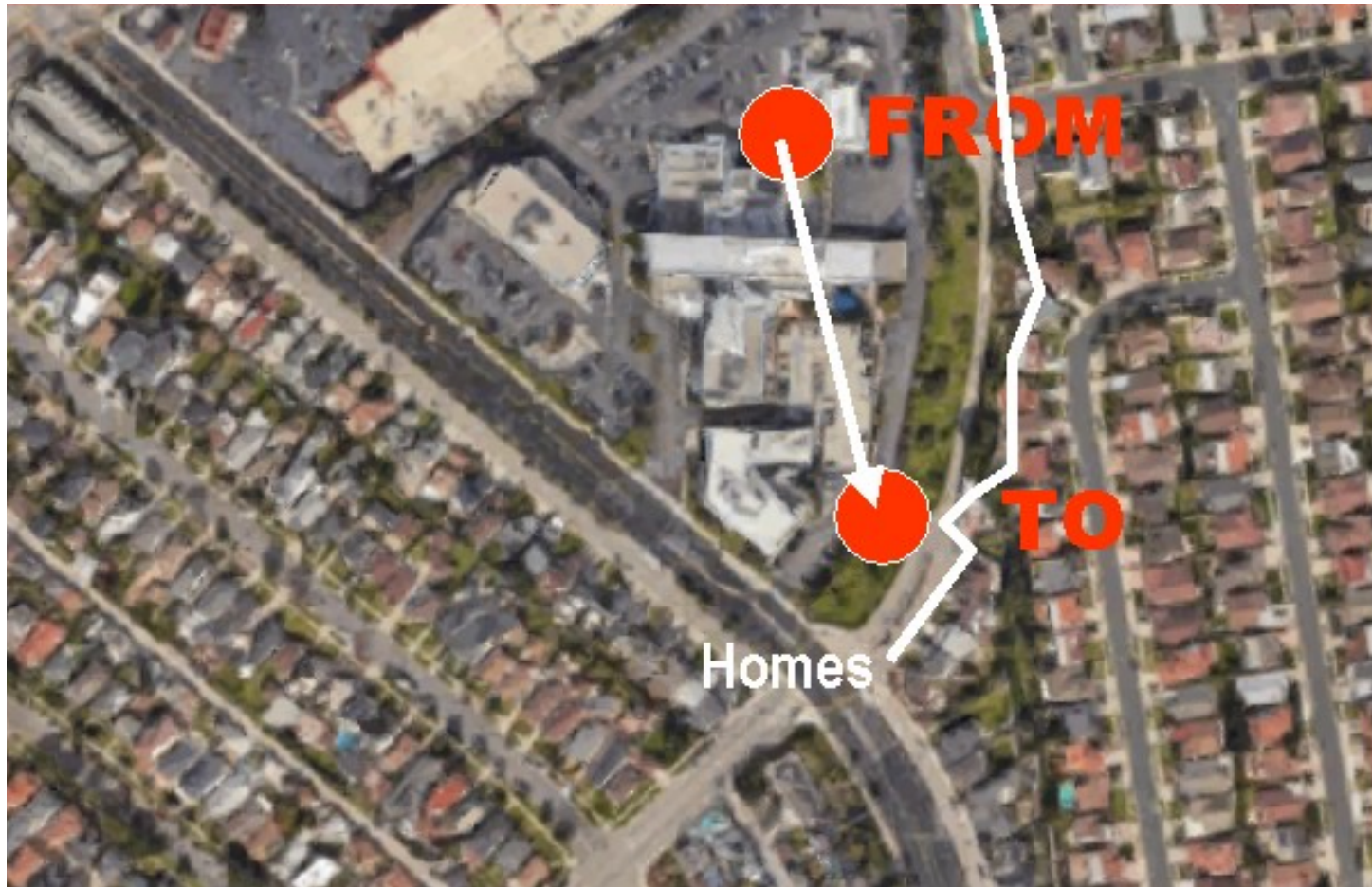
# Respect for Natural Terrain: BCHD “Maximized Effects”

BCHD is maximizing its impact by failing to respect the elevated site and building on the perimeter



## Utilities

BCHD is increasing its backup powerplant and fuel storage by 400% and relocating from the parking lot to less than 100-feet from residential adjacent to Diamond St.



# Utilities

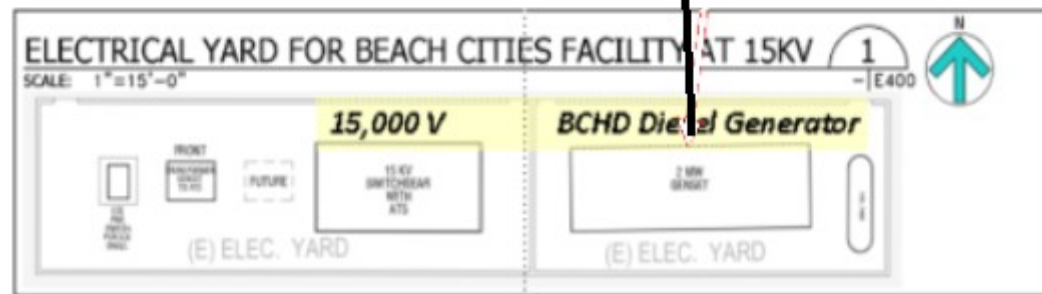
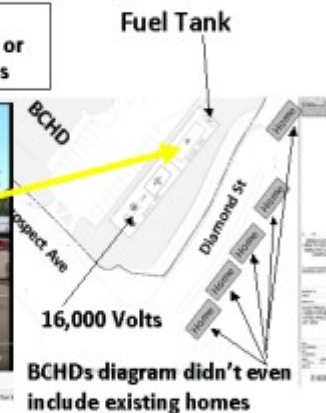
BCHD low lying location will concentrate exhaust to the Flagler Alley bike path, school child walking path, and toward Towers elementary

**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



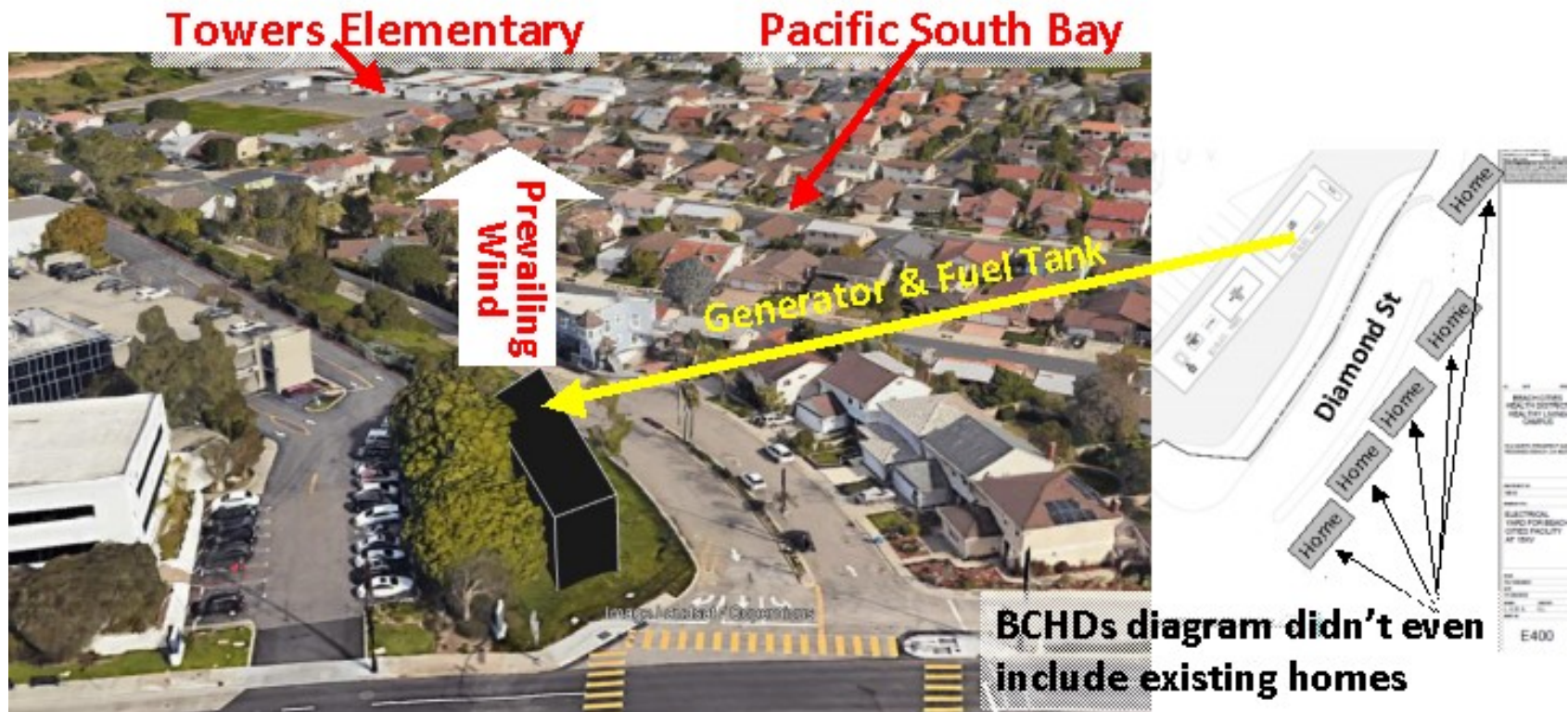
Caterpillar 2000 kW, CAT 3516B start up and load test - CSDO #2296





# Utilities

BCHD fuel delivery, pumping and storage along with particulate exhaust from 4MW powerplant is adjacent to homes on Diamond St.



Not applicable



Insufficient information

Insufficient information

# General Design Concerns

To be determined

To be determined

# Protection of Property Values (discussed in detail in “Property Values” document)

Econometric home value models demonstrate the nearer Redondo Beach single family property is to BCHD, the lower its value is, based on its primary characteristics. When distance from BCHD is removed, home values increase by over \$50,000 per home in the ½-mile surrounding BCHD. Further, property value damage is higher, the closer to BCHD. BCHD is currently 312,000 sf with only 968 sf maximum height of 76-feet and a 99% height of 52-feet or lower. BCHD is proposing 83-feet tall (courtyard, 108.7-ft street) with 800,00 sf of primarily damage maximizing perimeter build. In Phase 1 alone, BCHD plans for nearly 300,00 sf (doubling the size of the buildings on the site) at 83-feet courtyard height/108.7-ft above Beryl and Flagler streets.

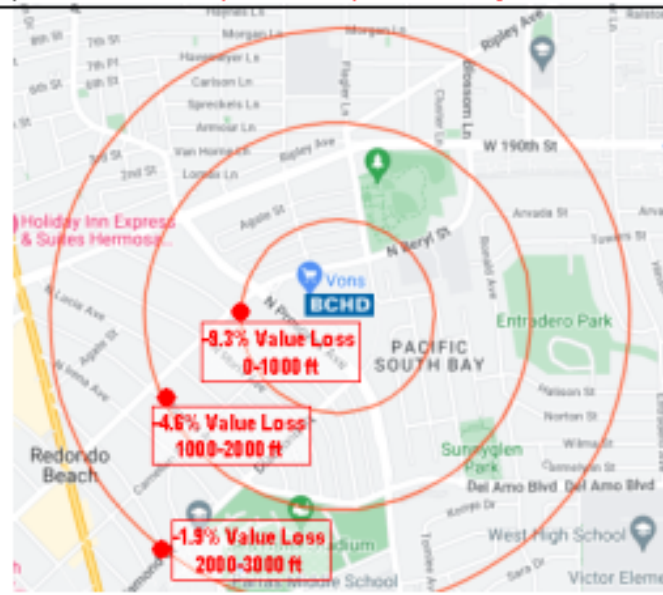
**TODAY – Existing BCHD Site Buildings**  
SIZE: 312,000 SQFT, HEIGHT: 99% is 52-feet or shorter



**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	<b>\$142,200</b>
1-2000 ft	<b>\$73,300</b>
2-3000 ft	<b>\$24,800</b>





# **Analysis of BCHD's Phase 1 and 2 HLC Project's Non-compliance with Redondo Beach Municipal Code for Protection of: "Property Values"**

# PROPERTY VALUES

## Based on Redondo Beach Municipal Code Applicable to the Planning Commission Design Review

RB Planning did not appear to counsel BCHD on RBMC compliance.

According to RBMC10-2.2502 Planning Commission Design Review (PCDR), an express purpose of the section is “to protect property values.” The section continues that the intent is actioned through “[t]he provisions of this section.”

Absent the objective and “to the letter” implementation of the section, it is unclear that property values will be protected. Based on the comments of the Planning Department to BCHD’s February 2022 Pre-CUP filing, it appears that the Planning Department has no intent of enforcing the RBMC\* and that the Planning Commission will be required to protect the surrounding Redondo Beach and Torrance residents from damage to quality-of-life and associated property values.

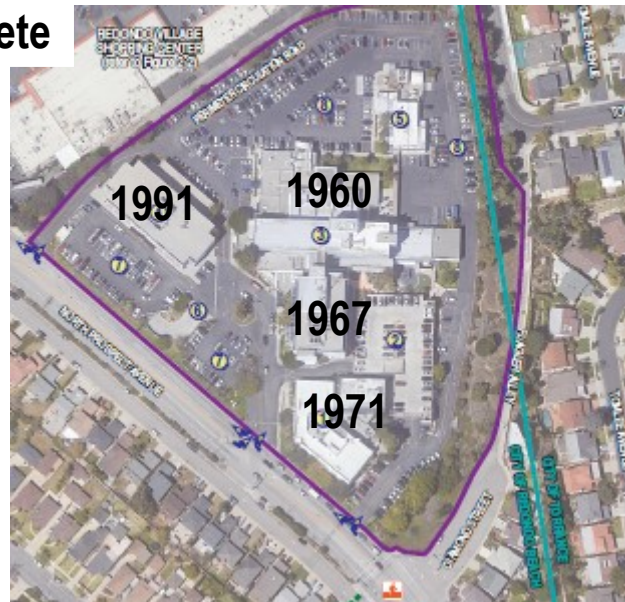
\*A review of the comments returned to BCHD show no concerns regarding project height, mass, bulk, volume, respect for the site terrain, character, style similarity to surrounding property, and other controlled components of the PCDR and RDG that are required “to protect property values.”

# PROPERTY VALUES

## Surrounding Built Environment

BCHD has publicly stated that the existing compound predated the surrounding residential. That is objectively false. The majority of Beryl Heights (except Prospect and north of Beryl) pre-existed the failed Hospital by a decade. The rest of Beryl Heights pre-existed Hospital Phase 2 and both Commercial Office Buildings. Beryl Heights and Torrance pre-existed both Commercial Office Buildings.

**North of Beryl**  
**1963 - Complete**



**Pacific South Bay**  
**Torrance**  
**1969 - Complete**

**Beryl Heights**  
**Redondo Beach**  
**1949 – Completed west of Maria,**  
**1951 – Completed west of Paulina,**  
**1965 – Complete**

# PROPERTY VALUES

## Surrounding Built Environment (Cont'd)

Beryl Heights predates at least 2/3rds of site buildings.

The existing campus has been expanded from approximately 100,000 sqft to over 300,000 from 1960 to 1991.

1960 – ~100,000 sqft original hospital for the 3 beach cities residents

1967 – ~50,000 sqft addition of south tower

1971 – ~50,000 sqft addition of 510 Commercial Office Building (510 COB)

1984 – Failure of South Bay Hospital as a Public Facility

1991 – ~50,000 sqft addition of 520 Commercial Office Building (520 COB)

Size 312,000 sqft, Max Height 968-sqft @ 76-ft, 99%+ Height @ 52-ft or lower

All of Beryl Heights was fully built out by 1965. The majority of Beryl Heights predated the Hospital and all of Beryl Heights predated the south tower.

Pacific South Bay was fully built out by 1969 and predated both COBs.

# PROPERTY VALUES

## Property Value and Externality Impact Modeling

### Econometric Modeling is Often Used to Assess Property Values and Impacts

Factors such as lot sqft, home sqft, year built, # bathrooms, # bedrooms, distance from a positive impact, distance from a negative impact, etc. are used to determine property value. Often, the factors are highly correlated, and larger lots have larger properties have more rooms, etc. Thus, the ultimate factors of statistical importance are determined by empirical analysis.

Data is available from a variety of sources, such as the private companies that BCHD's marketing consultant MDS used for BCHDs analysis.

In this case, the roughly 1,000 SFD within ½ mile of BCHD were used for modeling, along with their GIS distance from BCHD and their characteristics from the BCHD-used data vendor.



# PROPERTY VALUES

## Modeling Hypothesis

Property Value Models will be Augmented with BCHD Distance to Ascertain Whether BCHD is a Negative, Positive, or Inert Externality

The shape of BCHD's impact on surrounding property values will be non-linear. For example, if BCHD were a landfill, there is some point at which being further away does not further reduce the negative impact. Alternatively, if BCHD were open, public parkland, there is likely some distance that is "close enough", while there is some terminal distance where other parks compete once transportation is required. Thus, in either case, the impact should be greatest close, least far, and it should drop off by some form of power function, such as a logarithm or square root.

Because this is a RBMC requirement, only Redondo Beach SFD's were used in the dataset. One-half mile radius includes Torrance and Hermosa Beach. <sup>97</sup>

# PROPERTY VALUES

## Modeling Results

Modeling Results Demonstrate that Within a one-half Mile Radius, Property Values Increase with Distance from BCHD Controlling for Major Characteristics

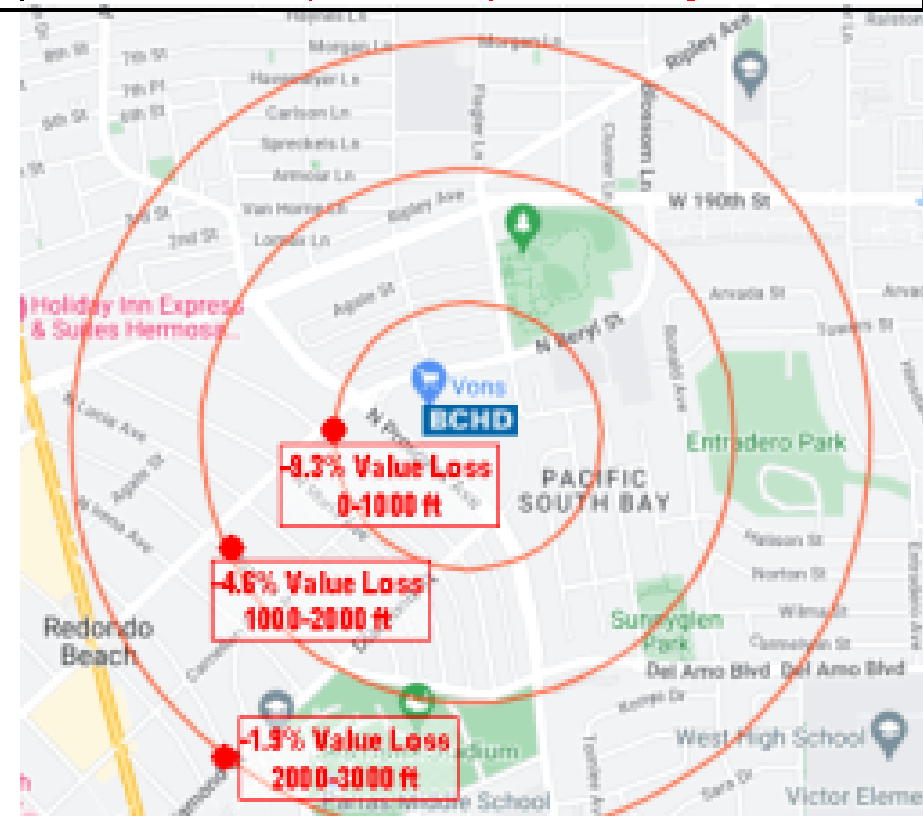
**TODAY – Existing BCHD Site Buildings**  
**SIZE: 312,000 SQFT, HEIGHT: 99% is 52-feet or shorter**



**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	<b>\$142,200</b>
1-2000 ft	<b>\$73,300</b>
2-3000 ft	<b>\$24,800</b>



# PROPERTY VALUES

## Modeling Results (Cont'd)

### Aggregate Property Value Losses Within one-half Mile of BCHD in Redondo Beach Total Over \$50M

Estimating the value of the surrounding property in the absence of BCHD raises overall values by slightly over \$50M, with a roughly \$50,000 average property owner loss due to the BCHD proximity factor.

BCHD has acknowledged damages to the surrounding neighborhoods but asserts that BCHD was there first and the owners of property should have known better. Neighbors apparently should have known that the campus would expand from 100,000 sqft to 800,000 sqft. Clearly that defense has been discredited since the 1960s in courts and in ethics texts. The fact remains, the current campus drained \$50M in property value in the surrounding one-half mile, and nearly tripling it will make the damages larger as the negative externalities propagate further.

# PROPERTY VALUES

## BCHDs Stated Views

BCHD Fails to Consider that 80%-96% of the Project Benefits Accrue Outside the Beach Cities and that 92-98% of the Benefits Accrue Outside Redondo.



### HAS BCHD CAUSED DAMAGE TO THE SURROUNDING NEIGHBORHOODS?

BCHD has not denied there are effects on neighbors from our operations, similar to other organizations, schools or businesses located near residences.

Further, the draft Environmental Impact Statement (EIS) for the proposed Healthy Living Campus Upgrade

Since BCHD's Campus opened, neighbors have complained about noise, traffic, and construction. They lived adjacent or near the campus at 510 and 520 buildings — yet neighbors still made the decision to accept the normal activities of a functioning hospital across the street from or near their property. Only now has this become an issue.

**No, 40% of Vons Shoppers are NOT from PV as with BCHD's Assisted Living Most Benefits of BCHD is Targeted at Non-Residents of the District For Assisted Living, PV is 40% of the tenants. For Allcove, Long Beach is 33% of the service area. For PACE, only 4% of 400 enrollees are Beach Cities residents.**

**Surrounding Neighborhoods have Frequently Complained about Excess Noise, Excess Nighttime Lighting, Traffic Backups and Construction. BCHD SIMPLY IGNORED THEM.**

**The Beryl Heights neighborhood predated South Bay Hospital and an 800% increase in size of the buildings since 1960 DAMAGES property values.**

# PROPERTY VALUES

## BCHDs Demonstrated Lack of Concern

### BCHD Refused to Consider Surrounding Property Values

As recently as last year, following BCHDs termination of the Community Working Group and increase in project height to 133-1/2 feet above Beryl St, BCHD had conducted no property value impact studies. NONE.

From: PRR <[PRR@bchd.org](mailto:PRR@bchd.org)>

Date: Tue, Oct 5, 2021 at 2:41 PM

Subject: RE: CPRA - Surrounding property values

Please see below for the District's response (in red) to your public records request received 9/29/21 that reads:

Provide all studies demonstrating the impact of the current BCHD on surrounding property values. No documents responsive.

Provide all studies demonstrating the impact of the proposed BCHD self-certified project on surrounding property values. No documents responsive.

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

Thank you.



# PROPERTY VALUES

## Redondo Beach and Torrance Must Strictly Enforce All Ordinances with Regard to BCHD to Protect Property Values

### The Effectiveness of the TMC and RBMC Rely on Enforcement

**Too Tall**: 108'-8" is over 4 times the average surrounding property height

**Too Big**: 800,000 sqft is larger than all of Beryl Heights and 800% larger than the 1960 South Bay Hospital

**Too Close**: South Bay Hospital respected the natural terrain and located in the center, minimizing impacts. BCHD moved to the edges, MAXIMIZING impacts.

**Out of Character**: Concrete and glass, flat roof, commercial

**Wrong Style**: BCHD proposes a large commercial box from the 1950s Miami Beach strip

**Damages exceed Benefits**: 80% to 96% of benefits are non-resident/non-taxpayer for prospective programs Of the \$80M in annual revenue, BCHD is projected to get a maximum of \$2.5M for encumbering public land for 50-100 years

# **Analysis of BCHD's Phase 1 HLC Commercial Developer/Owner/Operator Project: “Benefits Claims”**

# Following Hidden Negotiations, BCHD Counsel Asserted to the Redondo Beach City Attorney that the HLC Project “Clearly” has “Significant Benefits” to Redondo Beach Residents

**As BCHD attempted to not have the P-CF campus require a rezoning vote of the public to commercial zoning, BCHD made claims about the net benefits of the HLC to Redondo Beach residents. BCHD provided no quantitative documentation. Absent detailed benefits analysis, it is more likely that a facility with 90% - 97% non-resident Redondo Beach Resident use will have NET DAMAGES, not NET BENEFITS.**

1. Use of BCHD funded studies and public records demonstrates that BCHD's HLC will serve only 2-8% Redondo Beach Residents, and 92-98% non-residents.
2. BCHD provided the City no quantitative detail of the HLC benefits and damages and therefore had no grounds to assert net benefits to the City Attorney
3. BCHD has provided the public no quantitative detail of the HLC benefits and damages and therefore has no grounds to assert net benefits to the Residents of Redondo Beach
4. BCHD concealed the discussion with City Attorney Mike Webb until after the BoD vote to approve the design to disadvantage the public
5. BCHD reported in public records responses that its “mission” and “abilities” do not require or allow the assessment of public health benefits – AND - BCHD has made no attempt to assess its existing or future property value damages to surrounding properties.
6. BCHD refuses to provide its Bluezones vendors workpapers on asserted benefit computations 104

# **BCHD's Phase 1 HLC will serve only 2-8% Redondo Beach Residents, and 92-98% Non-residents**

BCHD claimed that its HLC benefits were both obvious and significant to Redondo Beach residents as BCHD attempted to avoid a public vote on zoning, however, BCHD avoided any meaningful analysis of its benefits and damages.

Unequivocally, BCHD's Phase 1 HLC is designed to serve over 90% non-residents of Redondo Beach.

- 8% of BCHD RCFE, 5% of "allcove", and 2.4% of PACE Will Service Redondo Beach Residents

- BCHD provided no assessment beyond hand-waiving to the City Attorney as meaningful evidence of its claimed "significant benefits" and the City Attorney and staff are not development experts and could not identify the potential ruse.

- BCHD provided NO ASSESSMENT of damages to neighborhood character, privacy, property values, or quality-of-life.

- BCHD provided NO ASSESSMENT of damages from incompatibility/inconsistency in scale, mass, volume, bulk, architecture, design, and other mandatory characteristics of compliance in the RBMC.

# 8% of BCHD RCFE, 5% of “allcove”, and 2.4% of PACE Will Service Redondo Beach Residents that Absorb 100% of the Construction and Operating Damages

LOCATIONS SERVED BY BCHD PROGRAM	POPULATION	POPULATION FRACTION	ALLCOVE	SAFE IN THE SOUTH BAY	RCFE	PACE	COVID TESTS	AVERAGE BCHD PROGRAM ACTIVITY	ALLCOVE	
<i>Source</i>	<i>US Census</i>	<i>Computed</i>	<i>BCHD Press Releases</i>	<i>BCHD Press Releases</i>	<i>BCHD MDS Consultant Report</i>	<i>NPAOnline statistics</i>	<i>LACDPH</i>	<i>Computed</i>		
<b>Non-Resident Share</b>		<b>91.3%</b>	<b>91.3%</b>	<b>63.6%</b>	<b>80.6%</b>	<b>95.7%</b>	<b>84.0%</b>	<b>83.1%</b>	<b>91.3%</b>	<b>NON-RESIDENTS OF DISTRICT</b>
<b>BCHD Resident Share</b>		<b>8.7%</b>	<b>8.7%</b>	<b>36.4%</b>	<b>19.4%</b>	<b>4.3%</b>	<b>16.0%</b>	<b>16.9%</b>	<b>8.7%</b>	<b>RESIDENTS OF DISTRICT</b>
									<b>23.0%</b>	<b>TOTAL SOI WITH DISTRICT</b>
									<b>77.0%</b>	<b>NON-RESIDENTS OF DISTRICT AND SOI</b>
Athens	9,000	0.6%	0.6%	0.0%	0.0%					
Avalon	3,700	0.3%	0.3%	0.0%	0.0%					
Carson	90,000	6.4%	6.4%	0.0%	0.0%					
Catalina Island	300	0.0%	0.0%	0.0%	0.0%					
El Segundo	17,000	1.2%	1.2%	5.1%	2.9%					
Gardena	60,000	4.3%	4.3%	0.0%	0.0%					
Harbor City	25,000	1.8%	1.8%	0.0%	0.0%					
Hawthorne	87,000	6.2%	6.2%	0.0%	0.0%					
Inglewood	110,000	7.8%	7.8%	0.0%	0.0%					
Lawndale	33,000	2.3%	2.3%	0.0%	0.5%					
Lennox	22,000	1.6%	1.6%	0.0%	0.0%					
Long Beach	467,000	33.1%	33.1%	0.0%	0.0%					
Hermosa	19,000	1.3%	1.3%	5.7%	2.9%	0.7%				
Manhattan	36,000	2.6%	2.6%	10.7%	8.4%	1.3%				
PVE	13,000	0.9%	0.9%	0.0%	10.6%					
Rancho Dominguez	15,000	1.1%	1.1%	0.0%	0.0%					
RPV	42,000	3.0%	3.0%	12.5%	19.5%					
Redondo Beach	67,000	4.8%	4.8%	20.0%	8.1%	2.4%		<b>8.0%</b>		
Rolling Hills	1,500	0.1%	0.1%	0.4%	1.2%					
San Pedro	86,000	6.1%	6.1%	0.0%	0.0%					
Torrance	145,000	10.3%	10.3%	43.2%	10.1%					
Willmington	53,000	3.8%	3.8%	0.0%	0.0%					
Beyond Listed Cities		0.0%	0.0%	0.0%	30.0%					
Total Population	1,409,500									
BCHD Cities	122,000									
BCHD Residents as Fraction Total Population or Benefits		<b>8.7%</b>	<b>8.7%</b>	<b>36.4%</b>	<b>19.4%</b>	<b>4.3%</b>	<b>16.0%</b>	<b>16.9%</b>		

- 1) BCHD kept no records of testing city of residence, LACDPH offered total fraction data of BCHD vs Non-Residents
- 2) MDS report states 30% of RCFE tenants will be from outside listed zipcodes
- 3) Palos Verdes Peninsula Cities disaggregated by population shares
- 4) RCFE data based on BCHD MDS Consultant report
- 5) Covid testing based on LA County Dept of Public Health after BCHD responded that it was not tracking resident vs non-resident
- 6) PACE is based on National PACE Association data of 1 in 1,000 seniors utilizing PACE. BCHD is proposing a 400 enrollee program with 17 residents

# **BCHD provided the City no quantitative detail of the HLC benefits and damages and therefore had no grounds to assert net benefits to the City Attorney**

BCHD claimed that its HLC benefits were both obvious and significant to Redondo Beach residents as BCHD attempted to avoid a public vote on zoning.

BCHD made the following unsubstantiated claims of benefits:

- BCHD stated a “belief” of the need for senior housing without any definition of affordability or specific need that BCHD was filling

- BCHD blindly asserted that a Bluezones café and other health amenities would outweigh any unevaluated, unstated damages by asserting that the project would “Clearly” have “significant benefits” to Redondo Beach residents. Had BCHD not hidden the secret negotiations, the public would have stepped in and potentially litigated for the right to vote

**In short, BCHD provided no fact basis for its claim and denied voters their rights by withholding the discussions for nearly 18 months until after it voted on the project.**



# BCHD has provided the public no quantitative detail of the HLC benefits and damages and therefore has no grounds to assert net benefits to the Residents

In denying voters the right to even attempt a vote, BCHDs claim of “clearly” “significant benefits” to the Redondo Beach residents damaged the public. BCHD has never provided any sort of analysis demonstrating that the HLC will benefit residents of Redondo Beach more than it damages them.

BCHD provided NO ASSESSMENT of damages to neighborhood character, privacy, property values, or quality-of-life.

BCHD provided NO ASSESSMENT of damages from incompatibility/inconsistency in scale, mass, volume, bulk, architecture, design, and other mandatory characteristics of compliance in the RBMC.

BCHD has stated that it has no “mission” or “abilities” to evaluate its program benefits, such as RCFE, “allcove” or PACE in Phase 1.

From the CPRA response of BCHD: “The Districts [SIC] is currently preparing the FY22-23 Budget for next fiscal year and will also be update applicable performance, benefits and cost metrics. Please note that the District has previously explained that ***calculating a dollar community benefit for each program is beyond the scope of the District’s mission, financial resources and abilities.***” April 2022

**Summary: BCHD cannot assert benefits because it cannot/does not/does not have to compute them.**

# **BCHD failed to disclose the discussion with City Attorney Mike Webb until after the BCHD Board vote to approve the design, thereby disadvantaging the public**

BCHD made highly disputable claims to the City Attorney that were withheld from the public. The claims involved denying the public the right to vote on a required rezoning of the site.

BCHD Counsel made assertions on behalf of BCHD and CEO Bakaly absent the public's knowledge in order to deny the public the right to intervene and preserve its right to vote.

BCHD – RB Secret Negotiations:	Unknown – 2/2019
Restriction of Voter Rights	2/2019
BCHD Board Approval of Project Design:	6/2020
BCHD Disclosure of Secret Negotiations:	7/2020

A reasonable person must conclude that hiding negotiations to deprive the public the right to vote on zoning casts severe doubt on the accuracy and truthfulness of BCHD's claims to the Redondo Beach City Attorney.

Full Text Counsel Letter at:: <https://bit.ly/BCHDNoBenefits>

# BCHD reported in public records responses that its “mission” and “abilities” do not require or allow the assessment of public health benefits – AND - BCHD has made no attempt to assess its existing or future property value damages to surrounding properties

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From the CPRA response of BCHD:

Subject: RE: CPRA - Surrounding property values

Please see below for the District’s response (in red) to your public records request received 9/29/21 that reads:

Provide all studies demonstrating the impact of the current BCHD on surrounding property values. No documents responsive.

Provide all studies demonstrating the impact of the proposed BCHD self-certified project on surrounding property values. No documents responsive.

# BCHD refuses to provide its Bluezones vendors workpapers on asserted benefit computations

BCHD and Bluezones have made outrageous and unsupported claims of reduced insurance costs in the three Beach Cities due to Bluezones. When requested via public records act, BCHD refused, stating that Bluezones put a “confidential” stamp on the documents. As a public agency, BCHD should be forced to execute ONLY contracts with required disclosure.

## **Withheld due to BCHD error in contract terms**

*"Cost Savings of Blue Zones Project \$21 Million Direct Medical Expenses"*

*As stated in the slide, the source of the information is Gallup-Healthways. The District has identified a document responsive to this request, however the responsive document has been marked as 'Confidential and Proprietary' by the consultant. As such, the document remains properly withheld by the District.*

Bluezones and Gallup both refused to provide documentation as well.

**Thus, BCHD inflated claims must be discarded since they could have been arrived at on a cocktail napkin based on the information withheld.**

# **BCHD Lack of Mission, Abilities, Effort, and Contractual Expertise in Benefits Calculations Renders Any Claims of Net Benefits by BCHD to Redondo Beach Residents as Unsubstantiated and therefore Invalid**

Public agency or not, BCHD cannot assert claims and withhold evidence. BCHDs outside lawyers boldly asserted that “CLEARLY” the HLC would provide “SIGNIFICANT BENEFITS” to Redondo Beach residents. Neither BCHD nor its counsel provide any substantive backup for their assertions.

Furthermore, it can easily be demonstrated that only 2% to 8% of the BCHD proposed HLC will operate for the benefit fo Redondo Beach residents in the RCFE (Market Rate), “allcove” program, or PACE.

Thus, with all negative impacts, property value reductions, noise, traffic, etc. impacting Redondo Beach residents, it is clear that the de minimis benefits cannot outweigh the damages of the 110-foot tall, 800,000 sqft compound created 12-to-1 to 50-to-1 for non-residents of Redondo Beach.