

**From:** Mark Nelson

**Sent:** Wednesday, September 30, 2020 10:47 AM

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**Cc:** Communications <[communications@bchd.org](mailto:communications@bchd.org)>

**Subject:** PUBLIC COMMENT - BCHD Misrepresentation of HLC Benefits in Secret Negotiations

Public comment - Redondo Beach and Torrance Mayor and Council and Planning Commissions

In late 2018 or early 2019, BCHD entered into secret discussions with the City of Redondo Beach regarding BCHD's massive over-development project. How do we know they had secret negotiations? In July of 2020, BCHD finally released a letter to the Redondo Beach City Attorney dated February of 2019 documenting an alleged agreement with the City Attorney. Unfortunately, because the public, BCHD's taxpayer-owners, and the Healthy Living Campus Community Working Group were all excluded from the process, BCHD was free to make false statements about its over-development project without any public oversight.

BCHD represented to the City Attorney that their massive development that targets 35% residents from the Palos Verdes Peninsula, 30% residents from the rest of California (and even outside California), 11% Torrance from Torrance and only 5% from south Redondo 90277 unequivocally benefits Redondo Beach. BCHD's Century City lawyer wrote at BCHD's direction, "Clearly, the Healthy Living Campus project will be of significant benefit to the residents of Redondo Beach ..." That's a very bold statement. Clearly means "without dispute" and "all but certain". Significant means "noteworthy" and "extraordinary".

In a Public Records Act response, BCHD admitted that it has conducted no research on the 60 years of damages that South Bay Hospital and BCHD have had on the surrounding neighborhoods. They haven't even attempted to value the loss of privacy, sirens, extra car trips, toxic tailpipe exhaust, noise, bright nighttime sign and parking lot lighting, and Bluezones chronic stress "the silent killer." Worse yet, BCHD denies they have any negative impacts on the surrounding neighborhoods.

In another Public Records Act response, BCHD admitted that it doesn't even track its 40+ program's costs or benefits. After 25 years of spending \$14M a year (current budget), BCHD hasn't bothered to track program costs or benefits.

So it's clear that BCHD lied to the City Attorney when BCHD claimed that "Clearly, the Healthy Living Campus project will be of significant benefit to the residents of Redondo Beach ..." Redondo Beach only receives 9% of the benefits from the massive over-development project. South Redondo only receives 5% of the benefits - yet Redondo Beach residents (and mostly 90277) bear 100% of the environmental and economic injustice and negative externalities of BCHD's 705,000 sqft, 75-foot tall, 6 and 8-story over-development project.

BCHD doesn't track costs and benefits of its PRIOR programs, but yet somehow BCHD can GUARANTEE to the Redondo Beach City Attorney that it will provide FUTURE benefits? Overall, Redondo Beach has an 11-to-1 damages to benefits burden from BCHD's proposed development based on BCHD's own market study of targeted renters for the \$12,500/month assisted living facility.

BCHD has no program costs and benefits, and has no research on the damages to the surrounding

community. Yet BCHD guaranteed to the City Attorney that the benefits to Redondo Beach (not the Beach Cities, JUST Redondo Beach) were significant (extraordinary), even after taking into account all the economic and environmental injustice damages to the surrounding south Redondo Beach neighborhoods. That's a lie, plain and simple. BCHD doesn't have the information needed to make such an assurance to anyone. And if they have the data, then they were required by law to produce it in Public Records Act responses.

The only reason that BCHD got away with such a big lie until now is that they did this all in secret, without oversight of the public, their taxpayer-owners, or the Community Working Group. BCHD must withdraw its false claim immediately and stop operating in the shadows against the interests of the residents of Redondo Beach who bear 100% of the environmental and economic injustice burdens of BCHD's proposed over-development.

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Redondo Beach Property Owner  
3 Year Volunteer, BCHD Community Working Group

**From:** Mark Nelson

**Sent:** Thursday, October 1, 2020 5:11 PM

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**Subject:** Public Comments to BCHD Board, Redondo Beach and Torrance Mayors, Councils, and Planning Commissions - FALSE STATEMENTS REGARDING RCFE MARKET STUDIES

The following public comment is provided to the responsible CEQA agencies and the City of Redondo Beach as the potential issuer of a CUP. BCHD is in the process of publishing FALSE FAQs and this requires any BCHD data to require workpapers to be attached due to their gaslighting campaign.

**BCHDs FAQ wildly misstates both their own consultant's work and the size of the Beach Cities (Hermosa, Redondo, and Manhattan Beach) that own the BCHD.**

Per US Census data for 2019, the total population of the Beach Cities is 121,000.

Per BCHD's own MDS consultants, there will be 6,550 households age 75+ in 2024, and only 1,241 of those households will be income qualified to live in the BCHD's proposed development. BCHD's published numbers in their FAQ are false based on their own MDS consultant report that BCHD cites.

	POPULATION	HOUSEHOLDS (2024)		MARKET PROSPECTS (2024)
	Total	Total	75+	Income Qualified, 75+
Redondo Beach	66,749	34,151	3834	539
Manhattan Beach	35,183	14,033	1856	506
Hermosa Beach	19,320	9,678	860	196
TOTAL	121,252	57,862	6,550	1,241

Sources: <https://www.census.gov/quickfacts/redondobeachcitycalifornia>  
<https://www.census.gov/quickfacts/manhattanbeachcitycalifornia>  
<https://www.census.gov/quickfacts/hermosabeachcitycalifornia>  
[https://www.bchdcampus.org/sites/default/files/archive-files/Market-Feasability-Study\\_2019\\_0.pdf](https://www.bchdcampus.org/sites/default/files/archive-files/Market-Feasability-Study_2019_0.pdf)  
(Exhibits 3-2, 3-3, zipcodes 90254, 90266, 90277, 90278)

**BCHD FALSE FAQ**

The following is the full text of BCHD's false assertion:

FAQ: Has BCHD done any market research about the need for Assisted Living facilities in the South Bay?

Answer: BCHD retained MDS Market Research to conduct a market study(ies) evaluating the feasibility of a proposed assisted living and memory care community in Redondo Beach. Field work and analysis were originally completed in April 2016 and updated in August 2018 and May 2019.

The MDS Report projects the **number of Beach Cities residents age 75 and older** requiring assistance with two or more Activities of Daily Living health tasks (bathing, dressing, feeding, etc.) to be:

2019: 9,547 (32.5% of the 75+ population)  
2021: 9,911 (32.1%)  
2024: 10,458 (31.7%) (IMPLIES OVER 33,000 AGE 75+ RESIDENTS IN HERMOSA, MANHATTAN and REDONDO BEACH in 2024)

The MDS market studies are available at [www.bchdcampus.org/campus](http://www.bchdcampus.org/campus), listed under “Project Materials.”