

BLUE FOLDER ITEM

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

CITY COUNCIL MEETING April 6, 2021

J.1 PUBLIC PARTICIPATION ON NON-AGENDA ITEMS

PUBLIC COMMUNICATION

Khatirah Nazif

From: Mark Nelson (Home Gmail) <[REDACTED]>
Sent: Sunday, April 4, 2021 10:34 PM
To: EIR
Cc: Communications; martha.koo@bchd.org; noel.chun@bchd.org; michelle.bholat@bchd.org; jane.diehl@bchd.org; vanessa.poster@bchd.org; CityClerk; CityClerk@torranceca.gov; cityclerk@citymb.info; Brandy Forbes; cityclerk@hermosabeach.gov
Subject: DEIR VIS - 1 misrepresents the "highpoint" of the view ridge of Palos Verdes from Hermosa and Redondo Beach.
Categories: Khatirah



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BCHD Board Public Comment and DEIR Comment
PUBLIC COMMENT for Hermosa, Manhattan, Redondo and Torrance Mayors and Councils, Torrance and Redondo Planning Commissioners

The following BCHD statement is a misrepresentation of the appropriate "highpoint" for use with VIS-1. It is correctly the view from 190th & Prospect, not from 190th & Flagler.

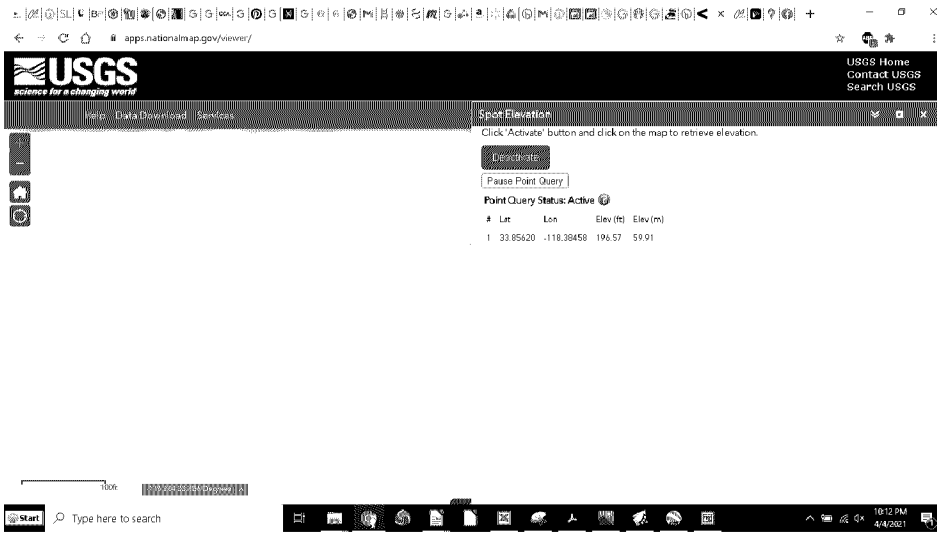
BCHD VIS-1 in total is:

"Impact VIS-1 The proposed Residential Care for the Elderly Building included in the Phase 1 preliminary development plan would interrupt public views of the Palos Verdes hills from the highpoint at 190th Street and Flagler Lane. However, a reduction in the height of the building would reduce this impact to less than significant with mitigation."

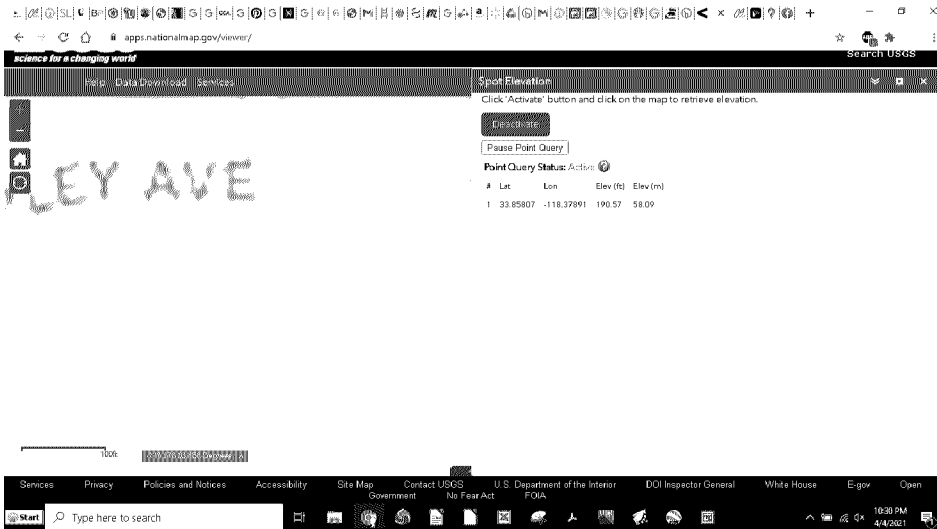
190th & Prospect according to USGS is 6-feet higher than 190th & Flagler and is the appropriate KVL for assessing the interruption of Palos Verdes scenic local views. The interruption of the PV view is much more severe from 190th & Prospect and the proposed mitigation for 190th & Flagler is insufficient. Below is USGS data, as well as, simulations of the extreme and significant view interruptions proposed by BCHD for both locations. By simple visual inspection, it is apparently that the impacts from 190th & Prospect are much greater, although both impacts are significant.

190th & Prospect - USGS - 196.57 ft

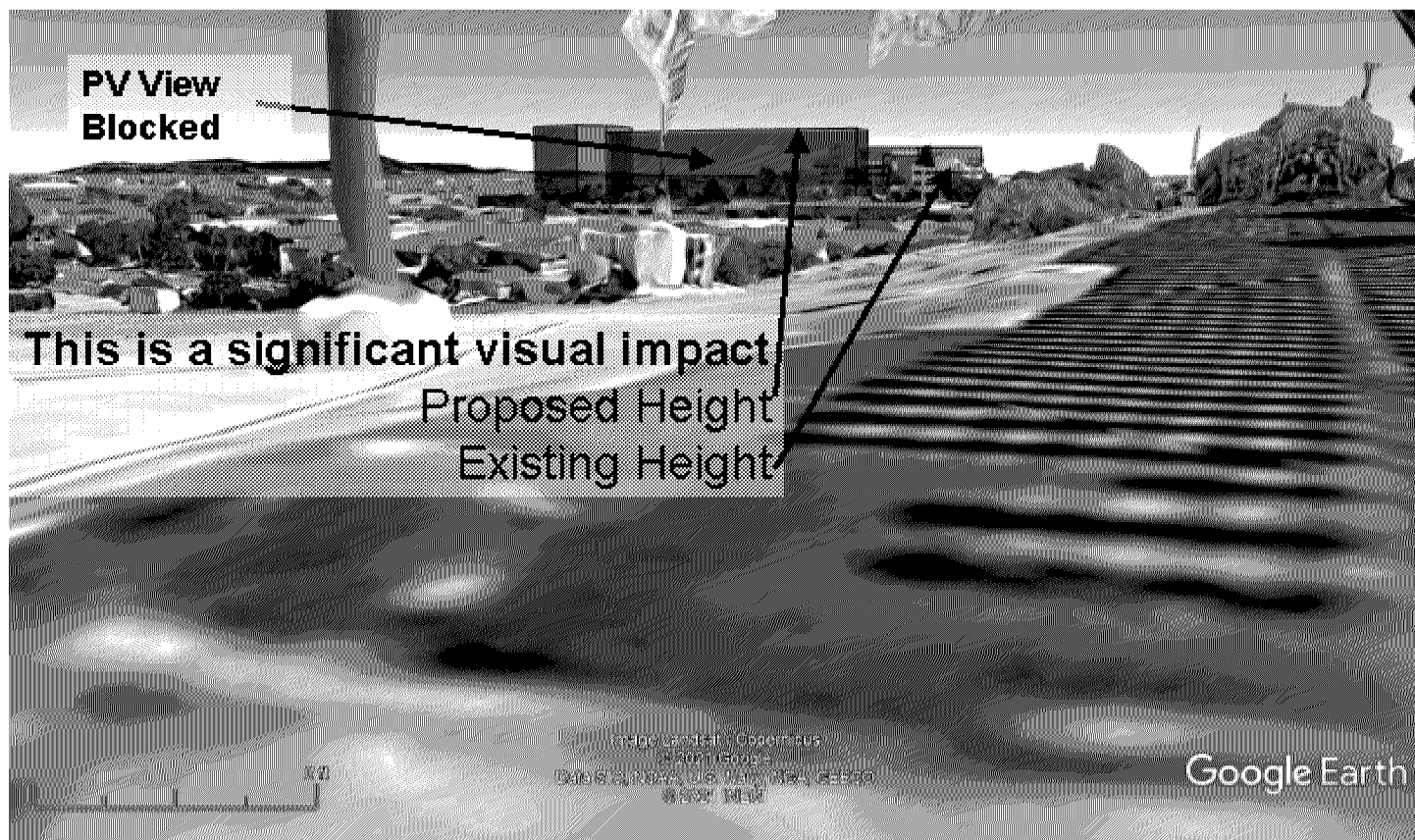
#	Lat	Lon	Elev (ft)	Elev (m)
1	33.85620	-118.38458	196.57	59.91



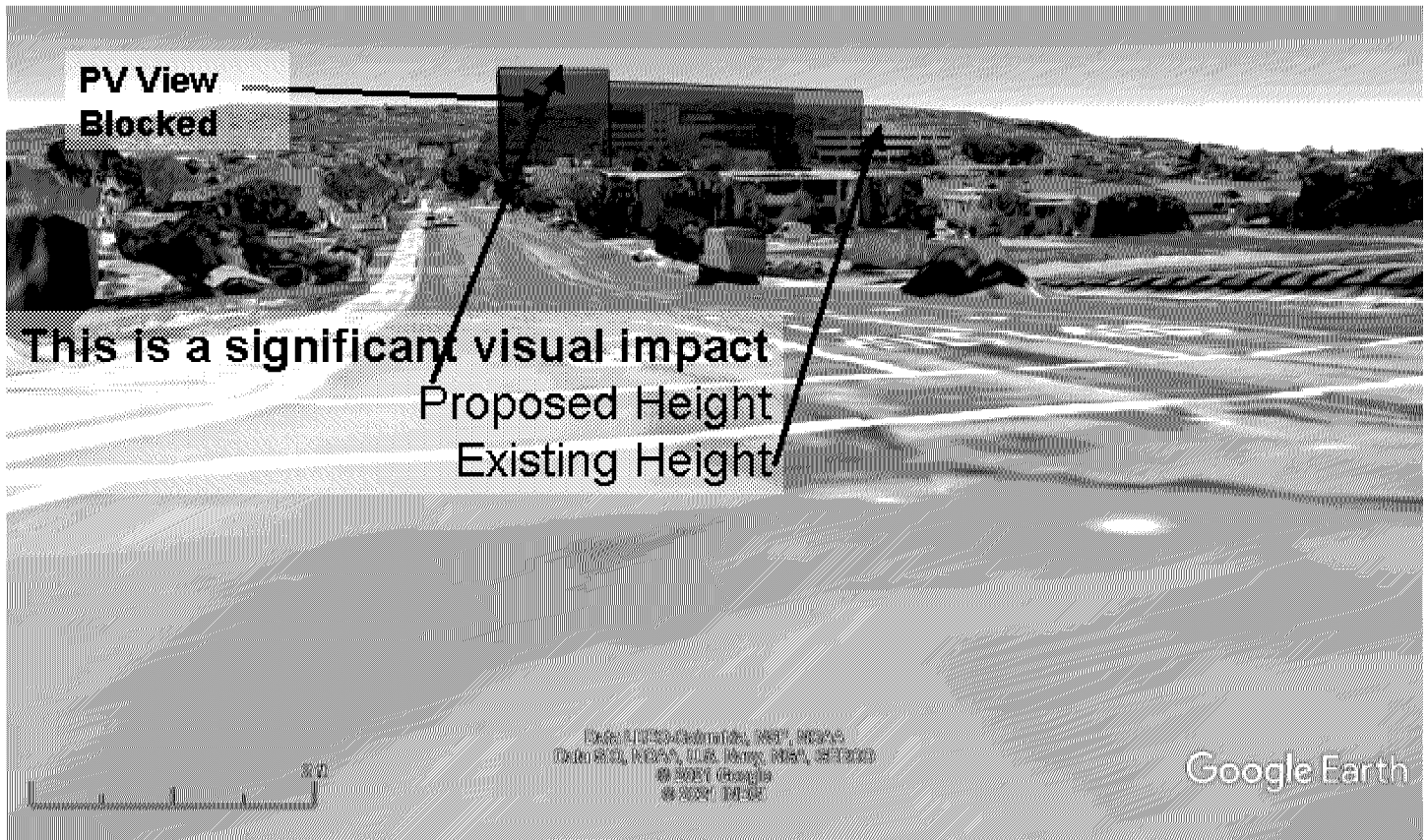
190th & Flagler - USGS - 190.57 ft
 #LatLonElev (ft)Elev (m)
 33.85807 -118.37891 190.57 58.09



Visual Simulations of BCHD Proposed View-block Maximizing Perimeter Construction – 190th & Prospect



Visual Simulations of BCHD Proposed View-block Maximizing Perimeter Construction – Prospect & Flagler



cc: PUBLIC COMMENT for Hermosa, Manhattan, Redondo and Torrance Mayors and Councils, Torrance and Redondo Planning Commissioners

Khatirah Nazif

From: Mark Nelson (Home Gmail) [REDACTED]
Sent: Saturday, April 3, 2021 2:50 PM
To: CityClerk
Subject: Public Comment to Mayor and Council for 4/6/21 Meeting - P-CF Zoning outside the Coastal Zone should NOT allow RCFE

Categories: Khatirah



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According to a plain reading of Measure K, it was conditionally limited only to the single parcel of the RBUSD at PCH and Knob Hill. There is no other reasonable reading of either the ballot language, or the Impartial Analysis of the City Attorney that accompanied Measure K.

<http://laserweb.redondo.org/weblink/DocView.aspx?id=293912&page=2&searchid=30787e9b-f71d-4fa2-976e-a8e1f3c14704>

[https://ballotpedia.org/Redondo Beach, California, Residential Care Facilities Amendment, Measure K \(June 2016\)#cite_note-Info-2](https://ballotpedia.org/Redondo_Beach,_California,_Residential_Care_Facilities_Amendment,_Measure_K_(June_2016)#cite_note-Info-2)

It appears that the will of the voters was misapplied in making RCFE a conditional use across ALL P-CF zoning.

Ballot question

The following question appeared on the ballot:^[2]

“ Shall the City approve amendments to the City Charter, General Plan, Coastal Land Use Plan, and Coastal Zoning Ordinance to conditionally allow residential care facilities for the elderly in the P-CF zoning district on properties over one acre in the Coastal Zone pursuant to a request from the School District to rezone surplus school property?^[3] ”

Impartial analysis

The following impartial analysis of the measure was prepared by the office of the Redondo Beach City Attorney :

“ Background. The land use regulations in the City of Redondo Beach are generally governed by the city's General Plan, Coastal Land Use Plan and Coastal Zoning ("Planning Documents"). This Measure amends the land use regulations for a 3.37-acre surplus school site owned by the Redondo Beach Unified School District ("RBUSD") zoned P-CF Community Facility, located at 320 Knob Hill Avenue ("Site"). ”

In 2007, the RBUSD Surplus Property Advisory Committee recommended that RBUSD lease the Site for fair market value. The RBUSD selected a developer to lease, construct, and operate a Residential Care Facility for ”

the Elderly ("RCFE") on the Site, which is not currently a permissible or conditional land use in the City's Planning Documents.

The existing land use regulations for the Site allow for a structure with a maximum height of three stories which may contain a variety of land uses, including, but not limited to, government buildings, hospitals, medical offices, schools, recreational facilities and child day care facilities. To facilitate the project, RBUSD and the developer must obtain amendments to the Planning Documents from the City.

RBUSD generally has a statutory right to request a zone change for unused school sites. Earlier this year, the Redondo Beach City Council approved a request from RBUSD and the developer to amend the City's Planning Documents. However, before these amendments can become effective they must be approved by the citizens of Redondo Beach pursuant to Article XXVII of the City Charter and approved by the California Coastal Commission ("CCC").

The Measure. Measure K, which was placed on the ballot by the City Council, would amend these Planning Documents for the Site. The Measure would amend the P-CF land use regulations in the Coastal Zone to add RCFE to the list of additional uses which can operate on the Site. The Measure would not modify the existing three story height limit regulations. Once effective, the Measure would allow for the construction of an RCFE on the Site, which was conditionally approved by the City Council as a two story development. The lease revenue from this development would be used to support the RBUSD's educational purposes.

Under State law, the City is required to submit Coastal Land Use Plan and Coastal Zoning amendments, such as the ones necessary for this project, to the CCC for certification. As part of this certification process the CCC can suggest modifications to the Coastal Land Use Plan and Coastal Zoning ("Suggested Modifications") to ensure consistency with the Coastal Act. Measure K also contains an amendment to the City Charter which exempts the City Council's adoption of the Suggested Modifications for the site from a second subsequent vote under Article XXVII of the City Charter).

Measure K requires approval of a majority of the voters in the City voting on it to become effective. A "yes" vote favors the changes for the RCFE project, a "no" vote opposes them.^[3]

—Redondo Beach City Attorney ^[4]

From: [Mark Nelson \(Home Gmail\)](#)
To: [CityClerk](#); citycouncil@hermosabeach.gov; CityClerk@torranceca.gov; CityCouncil@citymb.info
Subject: Public Comment for Next City Council Meeting
Date: Tuesday, March 30, 2021 10:10:31 AM
Attachments: [image.png](#)



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

Dear Mayors and Councilmembers:

BCHD is proposing a 103-ft tall, nearly 800,000 sf campus redevelopment. Currently, only 0.3% of the campus is at 75-feet, with the vast majority at 49-feet or below and the average height of 32-feet. The current campus is 312,000 sf, so that represents nearly a tripling of size.

The primary addition is the \$12,000+ per month assisted living facility that is being targeted at 35% tenants from Palos Verdes Peninsula, 30% tenants from outside the South Bay and less than 20% tenants from the 3 beach cities that own BCHD. Furthermore, less than 5% of tenants are expected from the 90277 zip code that has suffered 60 years of environmental and economic damage already from the BCHD compound and is proposed to suffer an additional 50-100 years.

The project by BCHDs analysis will create 5 years of non-mitigated noise, outside the general plan standards. The project cannot be issued its required conditional use permit absent mitigation of the noise by capping the project at the AVERAGE height of the existing 514 N Prospect building, which is less than 35-feet.

3.11.5 Project Impacts and Mitigation Measures

Impact Description (NOI-1)

- a) *The project would generate a substantial temporary or permanent increase in ambient noise levels in the project vicinity in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.*

NOI-1 Construction activities associated with proposed Project – including the Phase 1 preliminary development plan and the more general Phase 2 development program – would result in a temporary, but prolonged increase in noise levels at the following noise-sensitive residential areas: 1) Beryl Street between North Prospect and Flagler Lane; 2) Flagler Lane and Flagler Alley between Beryl Street and North Prospect Avenue; 3) Diamond Street between Flagler Alley and North Prospect Avenue; and, 4) North Prospect Avenue between Diamond Street and Beryl Street. While compliance with the Redondo Beach and Torrance Noise Regulations and implementation of a Construction Noise Management Plan would reduce construction noise, construction noise levels would exceed Federal Transit Administration (FTA) thresholds and this impact would remain *significant and unavoidable* during both Phase 1 and Phase 2 of the proposed Project.

Mark Nelson

Expert Witness

3+ Year Volunteer, BCHD Community Working Group on the Health Living Campus

From: [Mark Nelson \(Home Gmail\)](#)
To: ltamura@citymb.info; [CityClerk](#); CityClerk@torranceca.gov
Cc: [Communications](#)
Subject: Public Comments to Mayor and Councils, Redondo Beach, Hermosa Beach, and Manhattan Beach for Upcoming Council Meetings
Date: Monday, March 22, 2021 9:11:05 PM
Attachments: [image.png](#)



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Dear Mayors and Councils:

As the "owners" of Beach Cities Health District, I am communicating with you as both a 3+ year BCHD volunteer and as a property owner adjacent to BCHD.

Despite repeated lip service by BCHD of listening to the neighborhood, the revised BCHD 2020 campus plan is both TALLER and has more SQUARE FEET of surface buildings than did their 2019 proposal that drew over 1,200 surrounding residents to launch and sign a petition to downsize the proposal consistent with the surrounding residential neighborhoods that have 30 foot or lower maximum heights.

BCHD increased the height of their project from 60-feet, as stated in their EIR Notice of Preparation (NOP) in 2019 to 103-feet in their draft EIR. Surely that is not responding to neighbors seeking consistent sizing with the neighborhoods.

Further, BCHD removed 160,000 sqft of underground parking from their 2019 plan, and moved it to an 800-car parking ramp that could be between 8 and 10 stories according to BCHD's 2020 Draft EIR document. Again, that is surely not the response that residents expected. BCHD claims to have had over 1,300 comments. Given that 1,200 signatures came in on a single petition, and that over 150 comments were provided to their EIR NOP, and that over 100 comments were made on June 17, 2020 when BCHD provided only 3 business days for public input on their 2020 plan, I can only assume that BCHD discards comments that it disagrees with in order to arrive at its contrived 1,300 comment value.

In summary, BCHD **increased** the proposed height from 60-feet to 103-feet, and BCHD **increased** the proposed above ground square feet from 729,000 to 793,000 sqft, including an 8-10 story ramp at Prospect and Diamond. I ask that you rein in our wildly out of control local agency and force them to provide the surrounding neighborhood with a structure, like The Kensington, the meets the neighbor uses and does not negatively impact several thousand people for decades and generations. We have already suffered the environmental and economic injustice impacts of the failed South Bay Hospital that at least provided us with local emergency room services as a quid pro quo for the sirens, traffic, noise, air emissions, glare, excessive night time lighting, reduced home values and other negative impacts.

Mark Nelson
3+ year BCHD Community Working Group volunteer
Redondo Beach property owner

cc: BCHD Board

BCHD INCREASED BOTH THE HEIGHT AND ABOVE GROUND AREA OF ITS PROPOSED OVERDEVELOPMENT FROM 2019 to 2020

2019 PLAN

2020 PLAN

103 ft





60 ft

Total Height: 60-feet

Total SqFt Above Ground 729,700 sf



**Total Height: 103-feet
+53 Ft Tall**

**Total SqFt Above Ground 792,520 sf
+62,820 SqFt of Above Ground**

What BCHD CEO Bakaly CLAIMED

"For the past three years we've collected more than 1,300 public comments during more than 70 meetings and worked with financial, construction and environmental experts to minimize impacts on local neighborhoods."

"We think it's more consistent with what we were hearing," Bakaly said. "We are a public agency, so we do want to be listening."

What BCHD DID

Increased the height of the overdevelopment from 60-feet to 103-feet **(+88% INCREASE)**

Increased the SqFt of above ground buildings by **+62,820 sf**

Sources

Bakaly's Claims: TBRNews, June 17, 2020

2019 Surface Building SQFT: BCHD 2019 EIR Notice of Preparation, pages 13-14

2019 Height: BCHD 2019 EIR NOP, page 16

2020 Surface Building SQFT: BCHD 2020 DEIR HLC Master Plan, page 221

2020 Height: BCHD DEIR, page 2-27