

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.

PLANNING COMMISSION MEETING May 20, 2021

H. PUBLIC PARTICIPATION ON NON-AGENDA ITEMS

- Written comments on non-agenda items received after release of agenda
 - Holly Osborne
 - Mark Nelson

From: [Holly Osborne](#)
To: [Lina Portolese](#)
Cc: [Sean Scully](#)
Subject: Non Agenda Item, for the Blue folder; SB 478 and SB 778 for May 20 Planning Commission, 2021
Date: Thursday, May 20, 2021 1:37:32 PM



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

Dear Lina:

Please put these comments in Blue folder items for Planning Commission meeting tonight.

Thanks

Holly

There are many bills in the Senate right now that would have an effect on Redondo; here are two more.

1. Proposed Bill SB 478 (This one has a negative effect)

SB 478 by Scott Wiener says that any lot zoned for 3-7 houses has to allow a FAR (Floor Area Ratio) of 1.0; and any lot zoned for 8-10 houses has to allow a FAR of 1.25. (This bill does not apply to single family lots or duplexes; so it basically does not apply to R2 lots.)

But it could have a **very bad effect on R3 lots**. And Redondo has quite a number of "3 on a lots", The bill says that you cannot have lot coverage requirements, or setback requirements if they prevent a FAR of 1. Redondo has setback requirements and some open space requirements.

What would this mean? I have checked the FARs of many R3 lots on Zillow.com (random check); the FARs ranged from about 0.65-0.9. Then I saw a very recent one that had a FAR=1. But this lot was an exterior lot, so it did not have to have a driveway, since all units had access to the street. I do not believe any of the older interior lots have FAR = 1.

So, suppose you live on an "three on a lot", with the traditional setbacks, and an older lot next to you was finally sold. A developer could put 3 on that lot, with no setbacks. It would stick out like a sore thumb; and it most certainly would have no appreciable green coverage on the street side, although yours would. It would negatively affect your property.

I have written to Sen. Wiener asking that the bill not apply to R3 lots. I did finally get a response, but I think it is not clear

(What the bill says is that you can have setback requirements and height limits UNLESS you can't meet FAR = 1. It is very convoluted language. You decide what it says!

(c) (1) This section shall not be construed to prohibit a local agency from imposing any zoning or design standards, including, but not limited to, building height and setbacks, on a housing development project that meets the requirements of subdivision (b), other than zoning or design standards that establish floor-to-area ratios or lot size requirements that expressly conflict with the standards in subdivision (a).

Ben Allen is Scott's friend, and Senator Allen's office in North Redondo is right among the R3s.

Ben.Allen@sen.ca.gov; and call his office: (310) 318-6994, (916) 651-4026

Ask Senator Allen to Oppose SB 478.

Holly Osborne
Redondo Beach

P.S An article in Monday's May 17 LA Times on designing nice low-rise high density housing described the contrasting phenomenon perfectly. It talks about
"..commercial real estate developers, whose ideas of density tend to be based on a single principle - how many dollars they can squeeze out of every square foot - with little regard for green space or other community needs. (Case in point: those sad, blocky duplexes and triplexes jammed into islands of tree-less concrete.)"

2. SB 778 (This would have an interesting effect on Redondo)

**SB 778 says if you have mixed use, and you can't rent out your retail, (It has been vacant for 6 months), you can put an ADU there.
It sort of sounds logical. And it is not surprising,**

Discussion: We in Redondo have already seen that mixed use (at least on the smaller lots), plain and simple, does not work.

- 1) There are numerous vacancies in two mixed use projects in South Redondo
- 2) During the GPAC, it was shown that on lots on Artesia, having mixed use just does not "pencil out". It was for that reason that the GPAC did not want to zone any new mixed use; and wanted to change mixed use back to commercial on PCH.)

Also, zoning something mixed use, when it had been commercial, is a give-away to the property owner. It up-zones their property. We have seen that they put the maximum amount of residential possible, and the minimum amount of retail the can get away with.

(I know that I am very glad that the Grocery Outlet store was not zoned mixed use, or we would not have a store.)

- 3) Now this bill, if passed, would be very interesting in terms of Legado. Once Legado is built, the owner will not even have to attempt to find tenants for his retail. Just sit it out for 6 months, and apply for conversion of the first floor to residential. (ADUs) That is what the developer wanted all along. SB 778 is a get-out-of-jail-free card for developers of new mixed use projects.. Is that good or bad?

Here is an interesting alternative: Suppose that with a very high probability we can be certain that the developer will not be successful in a retail hunt. Why don't we tell him to just eliminate the retail floor altogether, and **then just lower the height of the project?**

- a) Lowering the height of the project will make the project cheaper for the developer.
- b) lowering the height of the project will make the project more palatable to the neighborhoods, who complained about its height.
- c) Tell the developer he can cut two of his units in half; and then rent those units out cheaper. Would we then get 4 cheaper units?
- d) We should also tell him he cannot reduce parking, The neighborhood will also benefit if he keeps his parking the same. Now the units will have enough parking, and so will the hotel, without the crazy valet system they were going to implement!

From: Mark Nelson (Home Gmail)

Sent: Monday, May 3, 2021 8:19 PM

To: CityClerk <CityClerk@redondo.org>; Bill Brand <Bill.Brand@redondo.org>; Christian Horvath <Christian.Horvath@redondo.org>; Todd Loewenstein <Todd.Loewenstein@redondo.org>; Laura Emdee <Laura.Emdee@redondo.org>; Nils Nehrenheim <Nils.Nehrenheim@redondo.org>; Zein Obagi <Zein.Obagi@redondo.org>; Brandy Forbes <Brandy.Forbes@redondo.org>; Joe Hoefgen <Joe.Hoefgen@redondo.org>; Ted Semaan <Ted.Semaan@redondo.org>

Cc: Kevin Cody <kevin@easyreadernews.com>; Judy Rae <easyreader@easyreadernews.com>; Lisa Jacobs <lisa.jacobs@tbrnews.com>

Subject: Public Comments to Mayor, Council, Planning, and City Manager Regarding BCHD Draft EIR

May 3, 2021

PUBLIC COMMENT

By email to Redondo Beach Mayor and City Council, Planning Commission, City Manager, and Planning Director

To the City Government Leaders of Redondo Beach,

I expect that the City of Redondo Beach will protect the health and property rights of all Redondo Beach residents. Furthermore, as a responsible agency, the City of Redondo Beach has an affirmative obligation to represent the residents and property owners of Redondo Beach in the CEQA process.

As a 40 year expert with the experience of many CEQA and NEPA proceedings, both as proponent and opponent, I have never participated with a less experienced agency than BCHD – an agency that abdicated its lead agency role to the City of Redondo Beach for both Medical Office Buildings on the Campus.

BCHDs clandestine actions with the City of Redondo Beach resulting in the false claim that “Clearly significant benefits ... to residents of Redondo Beach” were absent any evidence that the net benefits of a project to Redondo Beach, the City with 100% of the environmental and economic injustice impacts. Yet because they were hidden from the public view, it’s unclear if the City had the expertise or knowledge to challenge the BCHD falsehoods. Additionally, BCHD has had Bakaly at the City to rewrite the Land Use definitions. Again, by working the shadows, BCHD is disenfranchising the residents.

What follows is an executive summary our team comments that will not file with BCHD until June 10, 2021. Again, I expect the City, as my elected representative, to protect the citizenry and 1) challenge BCHD false statements in their February 2019 secret correspondence to the City Attorney, 2) refuse to modify the Public land use definition to deny the public their right to self-protection with a conditional use permit, 3) discontinue all non-public BCHD communications with any staff or consultant of BCHD and 4) provide aggressive comments as a responsible agency to protect Redondo Beach residents.

Thank you and what follows should help guide the City’s thinking and comments to BCHD, the completely lacking experience CEQA lead agency that has prejudiced its CEQA decision making by retaining a \$1.8M investment banker prior to CEQA self-certification or City of Redondo Beach CUP approval to find a partner and make a deal for BCHD’s full market priced, majority private owned facility on our public lands.

Mark Nelson

3+ Year BCHD Volunteer, Community Working Group

Redondo Beach Property Owner

The following are Key Areas of CEQA Process and Document Deficiencies that the City of Redondo Beach, as a responsibility agency and fiduciary of its residents and taxpayers should address in its CEQA comments:

BCHD HAS DISENFRANCHISED TAXPAYER-OWNER WITH SECRET NEGOTIATIONS

- BCHD Made False Representations of Net Benefits to Redondo Beach Residents
- BCHD is Attempting to Overturn Redondo Beach Land Use Definitions

BCHD PROJECT DESCRIPTION AND PROJECT ALTERNATIVES ARE INVALID

- BCHD Fails to Provide an Accurate, Stable and Finite Project Description
- BCHD Fails to Meet Programmatic EIR Requirements
- BCHD Project Alternatives are Inadequately Developed and Flawed

BCHD “PURPOSE AND NEED” IS INVALID

- BCHD Asserts a Requirement for Market-Priced RCFE on Public Land
- BCHD Asserts a Need for Fully Duplicative PACE Services
- BCHD Falsely Asserted to the Redondo Beach City Attorney that the Project Will Have Net Benefits to Redondo Beach Residents

BCHD PROJECT OBJECTIVES ARE UNSUPPORTED AND OVERLY RESTRICTIVE

- BCHD has Fabricated a Current Need for Seismic Retrofit or Demolition of the Failed Hospital
- Net Benefits of Current and Future Programs are Not Quantified and May be Negative
- Revenue Requirements for Programs with Net Benefits are Non-existent
- BCHD Has No Evidence of Net Benefits of RCFE to the Three Beach Cities or Redondo Beach
- BCHD Project Objectives are Overly Restrictive and Deny Environmental Protections by Targeting Only the Proposed Project and Extremely Similar Projects

BCHD ANALYSES, IMPACTS, AND MITIGATIONS ARE FLAWED AND INCORRECT

- BCHD Must Utilize its Moral Responsibility Standard to Prevent Community Health Harm for All Impact Analysis and Mitigation
- BCHD Understated the Public Controversy in the DEIR
- Aesthetics Impact and Mitigation Analysis is Flawed
- Air Quality Impact and Mitigation Analysis is Flawed
- Noise Impact and Mitigation Analysis is Flawed
 - Intermittent Impact will Significantly Negatively Impact All Students at Towers Elementary
 - Impacts will Impact ADA Rights of Students with Disabilities and IEP/504 Plans
- Recreation Impact and Mitigation Analysis is Flawed

- Traffic/Transportation Impact and Mitigation Analysis is Flawed
 - Intermittent Impact will Significantly Negatively Impact All Students at Towers Elementary
 - Impacts will Impact ADA Rights of Students with Disabilities and IEP/504 Plans

The following are Summary Discussions of the Specific Issues in the Key Areas of CEQA Process and Document Deficiencies that the City of Redondo Beach, as a responsibility agency and fiduciary of its residents and taxpayers should address in its CEQA comments:

SUMMARY COMMENTS TO BCHD DRAFT ENVIRONMENTAL IMPACT REPORT

Version 3 - May 3, 2021

PROJECT DESCRIPTION AND ALTERNATIVES

BCHD Failed to Provide an Accurate, Stable and Finite Project Description

Phase 2 Project Description is Not Accurate

BCHD provides only vague descriptions of the functionality of Phase 2 activities. In BCHD Board meetings, the CEO and Board members have repeatedly stated that no decisions have been made regarding the project, meaning that the description cannot be accurate.

Phase 2 Project Description is not Finite

BCHD provides multiple, differing descriptions of the buildings and therefore impacts of Phase 2. The public's right to intelligent participation is thwarted by BCHDs failure to provide a finite project description.

Phase 2 Project Description is not Stable

Clearly, the project description is not stable. Phase 2 is not finite, it presents multiple descriptions and views. BCHD failure to provide a stable project description thwarts the public's right to intelligent participation in the CEQA process.

Phase 2 Failed to Meet CEQA Requirements and Cannot be Intelligently Reviewed by the Public

Phase 2 is provided as several “what if” scenarios, and fails to: (a) meet the substantial evidence standard of review as to all of the required elements of an EIR; (b) address the environmental impacts of the proposed project to a degree of specificity consistent with the underlying activity being approved; and (c) provides too much uncertainty to allow for supplemental review that may be necessary in the future. In short, BCHD split it project into phases and failed to provide the needed information on the programmatic Phase 2. As such, augmentation and re-circulation of the DEIR is required.

Alternatives Were Inadequately Developed and Analyzed and then Improperly Rejected

The development and analysis of alternatives to a proposed project is a critical component of an EIR.

(Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 564.) The alternatives analysis serves an important purpose in providing the reviewing agency adequate information about feasible means to avoid impacts and gives the public a clear window into governmental decision making about environmental impacts. (Laurel Heights Improvement Assn. v. Regents of University of California (1988) 47 Cal.3d 376, 404.) BCHDs development of alternatives include false narratives of the “need” for seismic retrofit/demolition, are constrained by impermissible project objectives lacking even a basic level of detail, and the No Project Alternative is defective.

Project Alternatives Fail to Include BCHD Sunset and Conversion to a Community Garden

Health districts are an unneeded artifact of the failed public hospital experiment of the 1940s and 1950s. South Bay Hospital failed as a publicly owned hospital in 1984, after a mere 24 years of operation. BCHD alternatives should have included conversion over time to a community garden.

The “No Project” Alternative is Flawed

BCHD has no obligation, law or ordinance requiring seismic retrofit of 514 N Prospect. Therefore, the No Project alternative is clearly defective in the DEIR and should be the continued use of 514 on an as-is of modified basis for compatible commercial uses. The 514 building was developed as a hospital with intent nor obligation to be a revenue source.

An Accurate No Project Alternative was Inaccurately Formed and Rejected

The accurate No Project Alternative for the 514 building is continued use of the 514 building with required upgrades to mechanical systems performed as-needed on a rolling basis to minimize impact to current and future tenants. Use of the facility should be by tenants compatible with most cost-effective action. BCHD both failed in the formation of the No Project Alternative and also failed in its rejection of it.

PURPOSE AND NEED

BCHDs Purpose and Need is Invalid

BCHD Entered into Secret Negotiations – BCHD had secret negotiations with Redondo Beach while it was actively engaged with BCHDs volunteer Community Working Group. BCHD withheld the outcome of the discussions from the public for nearly 18 months until after it approved its project in June 2020.

BCHD Made False Assertions to the Redondo Beach City Attorney – Operating in the Shadows, BCHD made false assertions to the Redondo City Attorney about net benefits of BCHDs project to Redondo residents.

RCFE Financing is Expressly Forbidden

California code, including 15432 (14) expressly prohibits financing of residential care for the elderly (RCFE) under the California Health Facilities Financing Authority Act. If the Legislature intended health districts to have the ability to develop or finance RCFE, then the Legislature would not have specifically excluded RCFE.

The Legislature Repeatedly Mandates “Non-profit” as a Requirement for Financing – California Code, including 15432 (HEALTH FACILITIES FINANCING AUTHORITY ACT) repeatedly refers to nonprofit agencies and clinics. BCHD facility will be market-priced, for-profit. Further, it is planning to use commercial financing (FHA insured) instead of issuing low-cost, tax-free bonds.

No “Public Agency” Needs to Develop Commercial Market-priced RCFE

The free market uses commercial land to market rate rent facilities. BCHD is a public agency that should only develop cost-based, affordable facilities. In evaluating a health district’s RCFE project, the San Mateo county authorities stated “Because private providers are willing to develop market rate senior assisted living facilities, the District should evaluate the best use of public funds to serve District residents, including increasing access by low-income residents to District service.” It is clear that at \$12,500 per month rent requiring \$200,000 per year annual pre-tax income, low-income residents of the 3 Beach Cities are intentionally excluded by BCHD.

No Need for Duplicative, Wasteful PACE Services

BCHDs Program of All Inclusive Care for the Elderly (PACE) is fully duplicative of the State-registered LA Coast PACE operation that already services all the zipcodes of the BCHD owning cities and surrounding area. Duplicative services only drive up the cost of health care, and in this case, 91% of PACE members are paid for by both Medicare and Medicaid/MediCal.

PROJECT OBJECTIVES

BCHD Project Objectives Lack Foundation and Sufficient Detail for Public Analysis

The DEIR includes a list of project objectives that are unsubstantiated, vague, and deny the public intelligent participation. BCHD fails to provide any analysis of the current programs cost-effectiveness, scale or cost; future programs projected cost-effectiveness, scale or cost; the algorithmic basis for open space computation; justification of an RCFE on Public land for 80% non-residents; or any plausible basis in ordinance or law for 514 demolition.

BCHDs unsupported project objectives as a set impermissibly constrains the analysis of alternatives. (AR 5866-70.) Project objectives may not be overly restrictive so as to eliminate feasible alternatives. (North Coast Rivers Alliance v. Kawamura (2015) 243 Cal.App.4th 647, 670-671.) BCHD must specify and support its project objectives in a manner that supports intelligent participation of the public and in a way that does not allow BCHD to trigger failure conditions of project alternatives due to the unsupported, overly restrictive project objectives.

BCHDs Project Objectives are False and Unsupported by Facts

BCHD as project proponent is asking for the right to damage the environment and the health of surrounding students and residents. As such, BCHD must have both a valid, supported Purpose and Need, as well as, valid, supported Project Objectives. Through multiple California Public Records Act requests (CPRAs) and public materials, the 6 project objectives cited by BCHD are either unproven by objective quantitative studies or unproven by peer-reviewed, applicable research and/or false assertions by BCHD. *Because BCHD is also the lead CEQA agency and is approving its own Environmental Impact Report*, examination of BCHD's Purpose and Need and examination of its Project Objectives as a public agency are the only protection that taxpayer-owners of BCHD have.

Objective 1 is False - No laws or ordinances require seismic retrofit of 514 N Prospect (514) per CPA responses from BCHD

Objective 2 is False – BCHD is wrongly demolishing 514, BCHD has no budgets, cost-accounting, or evaluation of program expenditures, and therefore BCHD has no support for requiring replacement revenue per CPRAs

Objective 3 is Unsupported – BCHD has no evidence of a need for additional open space in the area beyond the 20+ acres of Dominguez Park nor any quantitative determination of any size of open space need from peer-reviewed studies per CPRAs

Objective 4 is False and Unsupported – BCHD has no evidence of any need for RCFE to be developed on Public land, nor any evidence that the market will not provide the same, market-rate RCFE per CPRAs

Objective 5 is False and Unsupported – BCHD has no forecast of future community health needs that can be served by its objective, BCHDs RCFE need determination is false and invalid, nor does BCHD any peer-reviewed evidence of the potential effectiveness of its solution per CPRAs

Objective 6 is Unsupported – BCHD has no forecast of any future revenue needs for any future services per CPRAs

CEQA IMPACT ANALYSIS

BCHD has Self-Asserted a “Moral Obligation to the Community” Standard of Action/Damages

CEO Bakaly in a video presentation asserted that BCHD has a moral obligation to proactively protect the community from health damages and BCHD must apply this more stringent standard to CEQA impacts as well for moral and ethical consistency as a publicly-owned agency.

BCHD Failed to Disclose All Areas of Public Controversy

BCHD failed to report over 1,200 surrounding residents' opposition to the 2019 design as too large, too high, and on the lot lines of residential land uses. BCHD 2021 DEIR design is both taller and more surface building area. BCHD failed to cite many other areas of public controversy in its Draft Environmental Impact Report (DEIR).

The Project Has Significant, Inadequately Analyzed Impacts and Mitigation

The EIR's analysis and mitigation of the project's impacts is inadequate. The project has significant aesthetic, air emissions, noise, recreation and traffic impacts that were not analyzed.

BCHD Project Aesthetics Analysis is Defective and BCHD has Significant Aesthetic Impacts

Plan is Inconsistent with Surrounding Uses – At a minimum 133.5-feet above surrounding residential to nearly 200-feet above west Torrance elevations, BCHD project is inconsistent with surrounding uses that have 27-foot and 30-foot maximum heights

Design Maximizes Visual Bulk and Mass Damages to the Surrounding Community – South Bay Hospital was built in the center of the campus to minimize mass and bulk, while the BCHD project is built on north, south and west perimeters and maximizes mass and visual bulk

Design Results in a Taking of Blue/Open Sky – Per the attached simulations, the plan causes a significant reduction in blue/open sky views of adjoining land uses

Design Results in a Taking of Daytime Sunlight – Per the attached simulations, the plan causes a significant reduction in blue sky/open views of adjoining land uses thereby resulting in a taking

Analysis Fails to Provide Hourly Shading/Shadowing Simulations – The analysis is insufficient and defective

Design Results in a Taking of Sunlight from Public Recreation at Towers – Towers fields are used for both school and organized sports and are impaired by shading of the 170-foot elevation of the project

Analysis Fails to Provide Sufficient Key Viewing Location (KVL) Simulations – The analysis is insufficient, inaccurate and defective

Design Results in a Taking of Palos Verdes Peninsula (PVP) Views – BCHD analysis factually errs on KVL selection for PVP by misstating elevations along 190th street

Design Results in Negative Health Impacts of Shading/Shadowing and Reduced Sunlight – Peer-reviewed studies demonstrate negative health impacts from reduced light, shadowing/shading

Design will Result in Excessive Glare and Reflection into Surrounding Neighborhoods – While some residents and Towers Elementary will be shaded/shadowed significantly, the 133.5-foot above street level, glass covered buildings of BCHD will impact surrounding land uses and structures with significant glare and increased thermal impacts.

Design will Result in Excessive Night Time Lighting into Surrounding Neighborhoods – As documented with photos and letters to BCHD, BCHD has excessive night time lighting directed from signage and parking lot lighting. Further, BCHD does not maintain light shielding. There is no reason to expect that a building 133.5-feet above the nearest street will not have significant night time excess lighting impacts. The health impacts of excess night time lighting have been endured by surrounding residents for over 60 years from South Bay Hospital and BCHD and are well understood as significant negative health impacts in peer-reviewed literature.

BCHD Project has Significant Air Emissions Impacts

Lesser Polluting Engines Still Pollute and Damage Students, the Elderly, and Disabled – BCHD acknowledges significant air emissions (pollution) and attempts to reduce the impacts with special engines. The special engines still pollute and the thousands of heavy truck trips and tens of thousands of worker commute trips will unequivocally increase pollution. BCHD has refused to provide the “safe” level of pollution in its CPRAs.

Covered Hauling Trucks Will Have Significant Particulate Emissions – Anyone who has ever followed a debris hauling heavy truck knows that even covered, BCHD will spew particulates across the grounds of Towers Elementary. There is no safe level of particulates and Towers students deserve the Moral Obligation standard of BCHD to have no additional particulates in their lungs or brain-stems.

BCHD 10-story Parking Ramp at Prospect and Diamond Will Have Significant Emissions – Anyone who has ever waited to enter or exit a 10-story, 800 car ramp knows that idling cars, both inside and outside the ramp spew toxic emissions and particulates. Also, anyone that parks nearly LAX knows that jet exhaust piles up on parked cars. BCHD claims that exhaust from the 10-story ramp will not collect in student lungs and impact residents. Again, BCHD must use its Moral Obligation standard and declare this significant impact.

BCHD Project Noise Analysis is Defective and the Project has Significant Noise Impacts

Analysis Fails to Consider Intermittent Noise and is Defective – BCHD averages noise levels to minimize health, concentration, and educational impacts of high decibel intermittent noise spikes

Intermittent Noise Significantly Impacts Education at Towers Elementary – Peer-reviewed studies demonstrate that intermittent noise negatively impacts education and development in classrooms

Intermittent Noise Significantly Impacts ADA IEP and 504 Plan Implementation at Towers Elementary – The ADA, IEPs and 504 Plans frequently include minimized distractions as part of student accommodations for students with disabilities, and the intermittent noise at Towers from heavy truck traffic and construction will violate students’ ADA rights and educational progress

Significant Noise Impacts on the Health of Surrounding Residents – Peer-reviewed studies demonstrate significant negative health impacts from noise, including but not limited to cardiovascular, stress, chronic stress, irritability and fatigue

Event Noise Analysis is Insufficient and Defective – BCHD asserts amplified noise events until 10PM in a man-made concrete canyon of buildings and fails to provide modeled analysis

BCHD Fails to Use Proper Noise Standards and the Analysis is Defective – All BCHD activity must abide by maximum residential noise standards of Redondo Beach adjoining land use and Torrance adjoining land use.

BCHD Project has Significant Recreation Impacts

Design Results in a Taking of Sunlight from Public Recreation at Towers and Significant Negative Impacts – Towers fields are used for both school and organized sports and are impaired by shading from the 170-foot elevation of the BCHD project and therefore safe, public recreation opportunities, especially for team sports, and curtailed or diminished

Design Results in a Taking of Sunlight from Student Health and Recreation at Towers and Significant Negative Impacts – Towers fields are used for both school and organized sports and are impaired by shading from the 170-foot elevation of the BCHD project and therefore safe, public recreation opportunities, especially for team sports, and curtailed or diminished

BCHD Project has Significant Traffic Impacts

Thousands of Heavy Haul Truck Trips will have Significant Traffic Impacts – BCHD plans to move heavy trucks past West High, across Prospect, and then past Towers Elementary. Traffic will back up on Beryl past Beryl Heights school and on Prospect past Parras Middle School. Commuter and student drop off/pickup traffic will be impacted, and students will be subjected to additional emissions.

Tens of Thousands of Worker Commuter Trips will have Significant Traffic Impacts – BCHD workers will add to commutes past local homes and schools, delaying existing traffic and compounding the health damages to students and residents.

BCHD Plans Traffic Management and Flaggers that will have Significant Traffic Impacts – Del Amo, Beryl and Prospect are the main heavy truck haul routes and BCHD contractors will require flaggers to stop traffic to enter and exit the site, as well as stop and stage vehicles. This will have significant impacts on local commutes and school drop offs/pickups, along with student inhalation of particulate matter. BCHD must apply its Moral Obligation standard and declare traffic as significant. Peer reviewed studies are clear that traffic and its emissions have negative health impacts.