



Bill Brand
Mayor

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July 16, 2019

Mr. Nick Meisinger, Environmental Planner
Wood Environment & Infrastructure Solutions, Inc.
9210 Sky Park Court, Suite 200
San Diego, CA 92123
EIR@bchd.org

RE: Notice of Preparation of an Environmental Impact Report for the Beach Cities Health District Healthy Living Campus Master Plan Review and Comments

Dear Mr. Meisinger:

On behalf of the City of Redondo Beach, California, please accept this letter as the City's official written comments in response to the Notice of Preparation/Initial Study for the Beach Cities Health District (BCHD) Healthy Living Campus Master Plan. The City respectfully submits these comments to BCHD, as the Lead Agency for the project, for consideration in the scope and content of the environmental analysis to be included in the Environmental Impact Report (EIR).

BCHD has proposed a multiphase development which generally includes a new Residential Care Facility for the Elderly (RCFE) and assisted living, a new Child Development Center, a Community Wellness Pavilion, which includes BCHD staff offices, a demonstration kitchen, meeting rooms, a café, space for potential medical offices/research or similar uses, and new parking facilities on approximately 10.38 acres. The project proposes this redevelopment to occur over three 36 month-long phases over a duration of 15 years.

It is suggested that BCHD further refine the project description in the EIR. The NOP project description states that there will be an increased number of units for assisted living that exceeds what exists currently on the site. The existing site has 60 memory care units, with up to 120 residents (2 residents per room). The project proposes an additional 360 units for assisted living. However, the total number of proposed residents at buildout is unclear. Please clarify the anticipated number of residents upon completion of the proposed project and any alternatives. It is also suggested that the project incorporate recreational opportunities for the general public, as well as providing prominent and direct pedestrian access from Prospect Avenue into the planned active green space. Trails around and through the project should also be incorporated. BCHD should also maintain public services and access during different phases of construction. As an alternative to the proposed project, the City recommends that BCHD consider a different number and different variety of housing types/units.

The Initial Study prepared for BCHD Healthy Living Campus Master Plan identified potentially significant impacts which will be addressed in the EIR, including Aesthetics, Air Quality, Cultural Resources, Tribal Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise and Vibration, Population and Housing, Public Services, Transportation, and Utilities and Service Systems. The Initial Study has also proposed additional analysis for some thresholds related to Biology. When evaluating these resource areas, the City requests that BCHD consider the following when evaluating impacts of the proposed project:

- **Aesthetics.** The City recommends that the aesthetics analysis consider multiple locations within surrounding residential neighborhoods to the south, west, and east, including a comparison of the existing and proposed visual character, including consideration of the project's massing.
- **Cultural Resources.** BCHD should consider whether the project requires any review by the Redondo Beach Historic Preservation Commission or other historical review agency. Pursuant to AB 52 early consultations with local Native American Tribes should be ongoing and included within the EIR.
- **Hydrology and Water Quality/Geology and Soils.** The proposed project will have increased square footage and changes in the site contours. The project site currently has slopes ranging from 0 to 15 percent, with particularly steep slopes on the eastern boundary. The City requests that the EIR address the adequacy of drainage, erosion, and stormwater controls to ensure that the surrounding neighborhoods are not adversely affected from the modifications proposed by the project.
- **Noise and Vibration.** The sound and vibration expected during construction and operation should be taken into consideration when assessing potential impacts, including but not limited to events planned at the proposed Wellness Pavilion and Open Space area and impacts from increased emergency medical services sirens.
- **Public Services.** As discussed in BCHD's NOP/IS, the City has concerns that the "[p]roject operations would result in increased demand for fire protection and emergency medical services, potentially resulting in significant impacts." (NOP/IS p. 57.) Please ensure that a detailed analysis of this issue is presented in the Draft EIR.
- **Transportation.** The proposed project includes a 227% increase in building square footage from existing conditions (260,900 sf existing and 592,700 sf proposed). The EIR should consider circulation during construction (on site and in vicinity), and circulation during operation (on site and in vicinity).

In addition to the environmental issues listed above, the City requests that BCHD consider the following land use and planning comments related to project. As noted in the Initial Study, BCHD is required to obtain a Conditional Use Permit (CUP) and Planning Commission Design Review from the City of Redondo Beach to implement the proposed project. As discussed in the criteria below, BCHD may also need to submit a Landscape and Irrigation Plan (RBMC 10-2.1900), as well as an application for Sign Review (RBMC § 10-2.1800 et seq), and permits related to the Building Division, Engineering Division, and Business Licensing. Additionally, if there are improvements required in a municipality's right of way, permits may be required for that work from the Engineering Department of the respective municipality or Caltrans. The EIR should also consider the construction vehicle impacts on road conditions over the multiple phases of the project. BCHD should also address the project's effects on public services, including staffing levels and mutual aid capabilities.

While vehicular Level of Service (LOS) is being phased out from CEQA pursuant to Senate Bill 743, the City requests that BCHD consider the project's effects on vehicular LOS, from at least a planning perspective. The Project also proposes a decrease in parking from 814 existing parking spaces to 690 parking spaces. BCHD should also ensure that it is able to demonstrate compliance with the City's parking standards discussed under RBMC § 10-2.1700 et seq., including providing adequate parking during all phases of the project, particularly during the first phase where the existing lot will be demolished. BCHD should also clarify whether it is requesting approval for shared parking during any of the project phases. (See RBMC § 10-2.1700(d).)

The City also requests that BCHD condition the project approval upon preparation and implementation of a Construction Management Plan (CMP). The City of Redondo Beach traditionally requires a CMP as a standard condition of approval for projects similar to the BCHD project. An example of such a plan is included as Condition COA TRA-1 which was required for the South Bay Galleria Project approved in January 2019. (Redondo Beach Resolution No. 1901-004, p. 27.)¹

The South Bay Galleria CMP required: (a) A flagman shall be placed at the truck entry and exit from the project site at the times trucks are present, (b) To the extent feasible, deliveries and pick-ups of construction materials shall be scheduled during non- peak vehicular travel periods to the degree possible and coordinated to reduce the potential of trucks waiting to load or unload for protracted periods of time, (c) Access shall remain unobstructed for land uses in proximity to the project site during project construction, (d) Minimize lane and sidewalk closures to the extent feasible. In the event of a temporary lane or sidewalk closure, a worksite traffic control plan, approved by the City of Redondo Beach, shall be implemented to route traffic, pedestrians, or bicyclists around any such lane or sidewalk closures, (e) Minimize interruptions to transit services and facilities. In the event that a temporary removal or

¹ Redondo Beach Resolution No. 1901-004 is available online at:
<http://laserweb.redondo.org/weblink/0/doc/328627/Page1.aspx>

relocation of a bus stop is necessary, coordination with Metro and other affected transit operators shall occur to ensure that any such action is consistent with the transit operator's needs, (f) The applicant shall coordinate with Metro and other turnaround loop transit operators at least 30 days in advance of right-of-way construction work to ensure that any such construction activities are consistent with maintaining the transit services' operations, (g) This CMP shall be developed by the contractor prior to the issuance of building permits, reviewed for consistency with this measure, and approved by the Community Development and Public Works Departments of the City of Redondo Beach. In addition to the measures identified above, the CMP shall include the following: (i) Schedule vehicle movements to ensure that there are no vehicles waiting off site and impeding public traffic flow on the surrounding streets, (ii) Establish requirements for the loading, unloading, and storage of materials on the project site, (h) Coordinate with the City and emergency service providers to ensure adequate access is maintained to the project site and neighboring businesses.

The following discussion outlines some of the City of Redondo Beach's zoning regulations for the project site, as well as a discussion of the entitlement criteria for the CUP and Design Review. To the extent that the EIR does not address some of the CUP and Design Review criteria, BCHD should be prepared to provide additional evidence as part of the project's entitlement process/applications.

Applicable Zoning Criteria of Public and Institutional Zone (P-CF) and Commercial Zone (C-2)

The BCHD Healthy Living Campus Master Plan is located largely upon a property zoned P-CF (Public and Institutional – Community Facility). BCHD should be aware of the specific purposes of this zone listed in the Redondo Beach Municipal Code (RBMC) § 10-2.1100, and the BCHD Healthy Living Campus Master Plan should comply with the RBMC § 10-2.1116 Development standards: P-CF community facility zone as noted below:

- (a) Floor area ratio. The floor area ratio shall be determined subject to Planning Commission Design Review.
- (b) Building height. Height of buildings or structures shall be determined subject to Planning Commission Design Review.
- (c) Stories. The number of stories of any building shall be determined subject to Planning Commission Design Review.
- (d) Setbacks. Setbacks shall be determined subject to Planning Commission Design Review.
- (e) General regulations. See Article 3 of this chapter.
- (f) Parking regulations. See Article 5 of this chapter.
- (g) Sign regulations. See Article 6 of this chapter.
- (h) Landscaping regulations. See Article 7 of this chapter.

- (i) Procedures. See Article 12 of this chapter.

Additionally, the BCHD Healthy Living Campus Master Plan includes a parcel located at the southeast corner of Beryl Street and Flagler Lane that is zoned C-2 (Commercial). For that portion of the project site located on the C-2 zoned property, BCHD should be aware of the specific purposes of this zone listed in the RBMC § 10-2.600, and the BCHD Healthy Living Campus Master Plan should comply with the RBMC § 10-2.622 Development standards: C-2 commercial zone as noted below:

- (a) Floor area ratio. The floor area ratio (F.A.R.) of all buildings on a lot shall not exceed 0.5 (see definition of floor area ratio in Section 10-2.402).

- (b) Building height. No building or structure shall exceed a height of thirty (30) feet (see definition of building height in Section 10-2.402).

- (c) Stories. No building shall exceed two (2) stories (see definition of story in Section 10-2.402).

- (d) Setbacks. The minimum setback requirements shall be as follows:

- (1) Front setback. There shall be a minimum front setback of five (5) feet the full width of the lot, except where a lot is contiguous to a residentially zoned lot fronting on the same street, in which case the required front setback shall be the same as required for the contiguous residential lot.

- (2) Side setback.

- a. There shall be a minimum side setback of ten (10) feet the full length of the lot on the street side of a corner or reverse corner lot.

- b. No side setback shall be required along the interior lot lines, except where the side lot line is contiguous to a residential zone, in which case the following standards shall apply:

- 1. There shall be a minimum side setback of twenty (20) feet the full length of the lot;

- 2. The required side setback may be modified pursuant to Planning Commission Design Review (Section 10-2.2502).

(3) Rear setback. No rear setback shall be required, except where the rear lot line is contiguous to a residential zone, in which case the following standards shall apply:

a. There shall be a minimum rear setback of twenty (20) feet the full width of the lot;

b. The required rear setback may be modified pursuant to Planning Commission Design Review (Section 10-2.2502).

(e) General regulations. See Article 3 of this chapter.

(f) Parking regulations. See Article 5 of this chapter.

(g) Sign regulations. See Article 6 of this chapter.

(h) Landscaping regulations. See Article 7 of this chapter.

(i) Procedures. See Article 12 of this chapter.

Entitlement Criteria at Planning Commission

- Redondo Beach Municipal Code § 10-2.2506(b) Conditional Use Permits:

(b) **Criteria.** The following criteria shall be used in determining a project's consistency with the intent and purpose of this section:

(1) The site for the proposed use shall be in conformity with the General Plan and shall be adequate in size and shape to accommodate such use and all setbacks, spaces, walls and fences, parking, loading, landscaping, and other features required by this chapter to adjust such use with the land and uses in the neighborhood.

(2) The site for the proposed use shall have adequate access to a public street or highway of adequate width and pavement to carry the quantity and kind of traffic generated by the proposed use.

(3) The proposed use shall have no adverse effect on abutting property or the permitted use thereof.

(4) The conditions stated in the resolution or design considerations integrated into the project shall be deemed necessary to protect the public health, safety, and general welfare. Such conditions may include, but shall not be limited to:

- a. Additional setbacks, open spaces, and buffers;
- b. Provision of fences and walls;

- c. Street dedications and improvements, including service roads and alleys;
- d. The control of vehicular ingress, egress, and circulation;
- e. Sign requirements or a sign program, consistent with the Sign Regulations Criteria in Section 10-2.1802;
- f. Provision of landscaping and the maintenance thereof;
- g. The regulation of noise, vibration, odor and the like;
- h. Requirements for off-street loading facilities;
- i. A time period within which the proposed use shall be developed;
- j. Hours of permitted operation and similar restrictions;
- k. Removal of existing billboards on the site, subject to the findings required by Section 10-2.2006(b)(7); and
- l. Such other conditions as will make possible the development of the City in an orderly and efficient manner and in conformity with the intent and purposes set forth in this chapter and the General Plan.

- Redondo Beach Municipal Code § 10-2.2502(b) Planning Commission Design Review:

(b) **Criteria.** The following criteria shall be used in determining a project's consistency with the intent and purpose of this section:

(1) **User impact and needs.** The design of the project shall consider the impact and the needs of the user in respect to circulation, parking, traffic, utilities, public services, noise and odor, privacy, private and common open spaces, trash collection, security and crime deterrence, energy consumption, physical barriers, and other design concerns.

(2) **Relationship to physical features.** The location of buildings and structures shall respect the natural terrain of the site and shall be functionally integrated with any natural features of the landscape to include the preservation of existing trees, where feasible.

(3) **Consistency of architectural style.** The building or structure shall be harmonious and consistent within the proposed architectural style regarding roofing, materials, windows, doors, openings, textures, colors, and exterior treatment.

(4) **Balance and integration with the neighborhood.** The overall design shall be integrated and compatible with the neighborhood and shall strive to be in harmony with the scale and bulk of surrounding properties.

(5) **Building design.** The design of buildings and structures shall strive to provide innovation, variety, and creativity in the proposed design solution. All architectural elevations shall be designed to eliminate the appearance of flat façades or boxlike construction:

a. The front façade shall have vertical and horizontal offsets to add architectural interest to the exterior of the building and where possible, bay windows and similar architectural projections shall be used.

b. The roof planes of the building, as well as the building shape, shall be varied where feasible, and a visible and significant roof line shall be used to soften the vertical mass.

c. Harmonious variations in the treatment or use of wall materials shall be integrated into the architectural design.

(6) **Signs.** Signs and sign programs shall meet the criteria established in Sign Regulation Criteria, Section 10-2.1802.

(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.

(8) **Conditions of approval.** The conditions stated in the resolution or design considerations integrated into the project shall be deemed necessary to protect the public health, safety, and general welfare. Such conditions may include, but shall not be limited to:

a. Changes to the design of buildings and structures;

b. Additional setbacks, open spaces, and buffers;

c. Provision of fences and walls;

- d. Street dedications and improvements, including service roads and alleys;
- e. The control of vehicular ingress, egress, and circulation;
- f. Sign requirements or a sign program, consistent with the Sign Regulations Criteria in Section 10-2.1802;
- g. Provision of landscaping and the maintenance thereof;
- h. The regulation of noise, vibration, odor and the like;
- i. Requirements for off-street loading facilities;
- j. Removal of existing billboards on the site, subject to the findings required by Section 10-2.2006(b)(7);
- k. Such other conditions as will make possible the development of the City in an orderly and efficient manner and in conformity with the intent and purposes set forth in this chapter and the General Plan.

These comments have been reviewed and approved by the Redondo Beach City Council at their July 16, 2019 public meeting. Additionally, written comments that had been submitted to the City Council for their consideration of this agenda item and a video of comments made during this agenda item at the City Council meeting are enclosed. If BCHD has any questions regarding this comment letter, please contact Community Development Director Brandy Forbes at (310) 318-0637 x2200 or via email at brandy.forbes@redondo.org. Thank you for the consideration of our comments.

Sincerely,



Mayor William Brand

ENCLOSURES:

- Public written comments received regarding City Council Agenda Item N1 of the July 16, 2019 meeting
- Video recording including public oral comments received regarding City Council Agenda Item N1 of the July 16, 2019 meeting

CC: City Council Members, City of Redondo Beach
Joe Hoefgen, City Manager
Brandy Forbes, Community Development Director

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 July 16, 2019

- N.1 DISCUSSION AND POSSIBLE ACTION REGARDING THE SUBMITTAL OF CITY OF REDONDO BEACH WRITTEN COMMENTS IN RESPONSE TO THE NOTICE OF PREPARATION FOR THE BEACH CITIES HEALTH DISTRICT (BCHD) HEALTHY LIVING CAMPUS MASTER PLAN WHICH ARE DUE NO LATER THAN 5:00 P.M. ON JULY 29, 2019**

CONTACT: BRANDY FORBES, COMMUNITY DEVELOPMENT DIRECTOR

- Public Comment Letters

From: Barbara Epstein

Sent: Tuesday, July 16, 2019 2:24 PM

To: Bill Brand <Bill.Brand@redondo.org>; Todd Loewenstein <Todd.Loewenstein@redondo.org>; Nils Nehrenheim <Nils.Nehrenheim@redondo.org>

Cc: Brandy Forbes <Brandy.Forbes@redondo.org>; John LaRock <John.LaRock@redondo.org>

Subject: Council Tonight

Dear Leaders,

I'm sorry this is so last minute. I had planned to attend the Council meeting tonight to share my support for all of you as you consider many important issues on the agenda. I regret that I am unable to join you this week. I will watch at home.

L-1, L-2

I am especially interested in this issue and appreciate learning details.

N-1

BCHD plans are cause for concern.

Historically, Redondo Beach has been victimized by predatory business and development practices through the last century, at least. Just since we moved here in 2012 we have witnessed Citizens' Measure A defeated by city and business players, developers' Measure B promoted by city leaders, developers' CenterCal disaster championed by city leaders, Citizens' Measure C opposed by city leaders, valuable public school property gifted away to Kensington, and so on.

To me, public land and taxpayers' infrastructure exists to benefit the public, not private corporations.

N-2

I fully welcome and support grant applications for AES Parklands.

Thanks to you who voted yes on the New Green Deal. It will be the beginning of an important conversation in our country, not really political, but philosophical in nature.

I was proud of the young people who spoke last time.

Thank you so much for your service to the community.



Barbara Epstein
230 The Village

From the desk of Delia A. Vechi [A true senior] District 2 310-372-8975

BEACH CITY HEALTH DISTRICT [BCHD]: HEALTHY LIVING CAMPUS

I will give you a summary of why I consider that this **fake** "Healthy Living Campus" is a **NO, NO**, for our City: Redondo Beach. [There are many, many more reasons but I do not have time, I need to make my living too.]

BCHD provide services to Redondo, Manhattan and Hermosa, but the burden as usually is on us. Part of the budget of BCHD is provided for us the tax payers, as all of you know.

Health Care Districts are providing programs **for health**. Some of them are for health education, wellness and prevention, mental and physical health of residents that they serve; in addition Health Districts can operate health care facilities and child care facilities.

There is not room for housing, no matter under the name of the seniors, **Health District are not Housing Developers**.

Redondo, with a **population of 67,908 has already 7 senior housing and 2 assisted living facilities** thanks to the brains that run our City. **The only benefit of these projects is for the developers and the ones that run the facilities; the city does not make the proper revenue!**

Manhattan Beach with a **population of 35,924 has only 2** because the **residents do not want those types of projects in its City**. The **residents** of that City, **come to the meetings to support** this Healthy Living Campus **here, in our City**, in order to keep the value of their properties and quality of life [imagen the ambulances coming and going and the burden on the first responders...]

The following is the list of senior housings in Redondo Beach, in case you forgot:

Salvation Army: corner of Beryl and Catalina Ave. across the Crown Plaza Hotel and next to Hotel El Redondo.

Casa de Los Amigos: by the beach, prime location blocking the view to the waterfront 123 S. Catalina Ave.

Seaside Village: 319 N. Broadway corner with Carnelian, across the City Hall.

Season: 109 S. Francisca Ave facing PCH, between Emerald St and Gardner St. former site of Mc Candles School demolished.

Heritage Point: 1801 Aviation Way [another school site eliminated]

The Montecito: 2001 Artesian Blvd corner with Green Ln. It is a 4 stories building [mixed use] that has blocked the view of the properties behind sending their value down.

Breathwater Village: 2750 Artesia Blvd, huge complex next to the Best Western Inn

Silverado: assisted living facility, 514 N. Prospect Ave inside the BCHD.

The Kensington: assisted living facility, 801 S. PCH location of Paterson School which was demolished. This one is for dementia and Alzheimer.

Plus all over the city, board and care homes that provide care to certain amount of seniors, with a license like **American Assisted Living:** 2420 Rockefeller Lane, as an example.

If the BCHD members that are behind this huge project have a clean conscience, they have from the beginning not avoided mentioning the amounts of senior units they were planning to build. Most of the ads, letters publicized or invitations did not refer to 420 units, always was gym, open space, a description of a green environment and healthy campus. **This project is only a large complex of assisted living for seniors, period!**

In addition, the BCHD bought the corner lot of Beryl St and Flagler Ln, to annex it to the existing land they are occupying now. That lot, for many years, was own for a petroleum company and there, petroleum pumps were working 24/7 until, I assuming, the wells were vacant and then the pumps were removed.

The day of **the first meeting, about 2 two years ago**, you cannot imagen, the expression of the faces of the CEO and his comrades when I exposed all of them to the public. **I asked** if that **land** has been **tested for**

toxic fumes or substances that can affect the health of humans and they have the evidences that it is safe to build on top. **I still waiting for an answer to this question that also I put in writing**, as BCHD requested the day of that first meeting. As I said above more than 2 years have passed...

Please do not be naïve and believe that these types of projects are for our seniors. If in all of the ones I've mentioned are living some of former residents of Redondo, it will be a miracle. I asked years ago, to elected authorities that should be conducted a survey to evaluate how many residents were from other cities. I'm still waiting never happened!

The senior housing allows fewer parking spaces, and of course the second car will be on the street. One person that is 65 can be married to a chick of 55 or less and they need two cars, but those projects only provide one space. Many of them receive tax payer money for the benefit of the developer ONLY!!!

I can wright a book with facts regarding this subject, and because I do not have the time, if I am continuing explaining you what is wrong to have anyone more senior housing and assisted living facilities in Redondo I stop short. Besides, **I am the one who decided if I like to live in a senior community nobody impose that to me!!! I AM A SENIOR that loves, the youth, the kids, the noise and the LIVE THAT THEY GIVE US!!!**

REMEMBER that WE ARE NOT LONGER A VIBRANT BEACH CITY, WE ARE "WAITING FOR GOD" [applies the name of a very funny British TV series] because we discriminate with families with children: DEMOLISHING SCHOOL SITES and keep the kids for years in portables. The families are moving to Manhattan, Palos Verdes Peninsula, I can probe my point giving examples.

My new song with pop music:

"Seniors, seniors, seniors... everywhere
where are the families, where are the kids,
where are the schools...

Where is the vision...?

NO VISION, NO BRAIN, ambulances everywhere.

Re: Agenda Item N1

July 16, 2019

Happy Summer Mayor, Council and Staff! I regret that I cannot attend this most important discussion. Please accept this email as my testimony.

The Spanish-American philosopher and poet opined:

“those who cannot remember the past are condemned to repeat it”.

This is what you will subject the residents of Redondo Beach to if you pass N1 and condone the Beach Cities Health District's Draft EIR .

Vote NO PROJECT!

Are we STILL NOT SUFFERING AS A WHOLE because the council did not listen to the public with the MALL BY THE SEA??? Now it's this huge project with as FEW MEETINGS as the Centercal debacle.

Vote NO PROJECT!

- 1) Without proper vetting from an independent source to see if the city and SOUTH BAY residents REALLY need this type and SCOPE of a project
- 2) There is ALREADY 10 Senior Housing Projects in Redondo Beach .
- 3) IF a project of this nature is needed, why not search out OTHER COMMUNITY SITES and use the TAX MONIES of Manhattan Beach, Hermosa Beach, Torrance, and Palos Verdes ?
- 4) This project should NOT EVEN BE Considered DURING SUMMER WHEN folks are not in town to EVEN KNOW the issues!!!

Thank you!

Melanie Cohen- District 2
115 S Guadalupe Av Unit H
Redondo Beach , Ca 90277