



Administrative Report

N.1., File # 21-2530

Meeting Date: 6/8/2021

To: MAYOR AND CITY COUNCIL
From: BRANDY FORBES, COMMUNITY DEVELOPMENT DIRECTOR

TITLE

DISCUSSION AND POSSIBLE ACTION REGARDING THE SUBMITTAL OF CITY OF REDONDO BEACH WRITTEN COMMENTS IN RESPONSE TO THE DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR THE BEACH CITIES HEALTH DISTRICT (BCHD) HEALTHY LIVING CAMPUS

EXECUTIVE SUMMARY

Beach Cities Health District (BCHD) began planning for redevelopment of the BCHD site located in Redondo Beach for a Healthy Living Campus. Through that planning process, with several iterations, BCHD developed the current 2020 Healthy Living Campus Master Plan.

A Notice of Preparation (NOP) was issued in June 2019 by the Beach Cities Health District (BCHD) to inform Responsible and Trustee Agencies, other public agencies, and interested members of the public that BCHD has independently determined that the proposed BCHD Healthy Living Campus Master Plan may result in potentially significant environmental impacts per the California Environmental Quality Act (CEQA). The City of Redondo Beach Mayor and City Council approved comments on the scope at their July 16, 2019 meeting (attached), and those were submitted to BCHD by the July 29, 2019 deadline to be included in the CEQA record for the project.

BCHD, as the public agency that will carry out the project, is the Lead Agency for this project and will be charged with applying the appropriate CEQA process for completing and certifying the Environmental Impact Report (EIR). The City of Redondo Beach is a Responsible Agency per CEQA, since the project will require approvals from the City, including a Conditional Use Permit and Planning Commission Design Review.

On March 10, 2021, BCHD issued the Draft Environmental Impact Report (DEIR) with a 90-day public comment period. Redondo Beach City Staff have reviewed the document and have prepared a comment letter on the DEIR for City Council consideration. This is not a review of the project, but rather comments on the environmental analysis that was conducted and presented in the DEIR. Since the City is not the Lead Agency, and therefore has to provide feedback and comments on the DEIR officially in writing, staff is bringing this item to give the City Council an opportunity to review the draft letter and consider any additional comments to add before the document is submitted to BCHD through the technical CEQA process.

BACKGROUND

Beach Cities Health District (BCHD) began planning for redevelopment of the BCHD site located in Redondo Beach for a Healthy Living Campus. Through that planning process, with several iterations, BCHD developed the current 2020 Healthy Living Campus Master Plan.

The NOP was distributed on June 27, 2019 to solicit written comments from Responsible and Trustee Agencies, interested public agencies, and members of the public regarding the scope and content of the environmental analysis to be included in the EIR, including significant environmental issues and reasonable alternatives and mitigation measures, and other pertinent information. The public review period stated in the NOP for when written comments are to be submitted is from June 27, 2019 through July 29, 2019. The City of Redondo Beach Mayor and City Council approved comments on the scope at their July 16, 2019 meeting, and those were submitted to BCHD by the July 29, 2019 deadline to be included in the CEQA record for the project. The purpose of the scoping comment letter was to assist BCHD in identifying the range of potential environmental impacts, mitigation measures, and alternatives to be analyzed in depth in the Draft EIR.

Per the CEQA Guidelines Section 15051, "If the project will be carried out by a public agency, that agency shall be the Lead Agency even if the project would be located within the jurisdiction of another public agency." Therefore, BCHD, as the public agency that will carry out the project, is the Lead Agency for this project. The Lead Agency is responsible for following the appropriate CEQA process, including preparing and certifying the EIR for the proposed project.

A Responsible Agency per CEQA means a public agency, other than the Lead Agency, which has responsibility for carrying out or approving a project. Since the project would require Planning Commission Design Review and Conditional Use Permit approvals, the City of Redondo Beach qualifies as a Responsible Agency. The City's role as Responsible Agency is to consider the EIR prepared by the Lead Agency and reach its own conclusions on the discretionary approvals for the project. The City may officially comment on the scope and content of the EIR, and subsequently on the Draft EIR.

On March 10, 2021, BCHD issued the Draft Environmental Impact Report (DEIR) with a 90-day public comment period. Redondo Beach City Staff have reviewed the document and have prepared a comment letter on the DEIR for City Council consideration. This is not a review of the project for entitlements, but rather comments on the environmental analysis that was conducted and presented in the DEIR. Since the City is not the Lead Agency, and therefore has to provide feedback and comments on the DEIR officially in writing, staff is bringing this item to give the City Council an opportunity to review the draft letter and consider any additional comments to add before the document is submitted to BCHD through the technical CEQA process.

As drafted, the DEIR comment letter includes concerns about 1) Phase 2 needing to have a Subsequent EIR once finalized, and 2) land use implications of the proposed project. There are several additional comments on the DEIR that are included in Attachment A to the letter, noting clarifications that should be made and additional General Plan goals and policies that should be evaluated in the EIR, but the comments in the letter itself are significant issues to be addressed. The full draft comment letter is attached for review.

As Lead Agency, BCHD prepared the Initial Study and determined that the BCHD Healthy Living

Campus Master Plan may result in potentially significant environmental impacts and issued the Notice of Preparation of and Environmental Impact Report in June 2019. The NOP comment period was provided, in which the City submitted comments on the scope of the EIR. Once BCHD concluded their scoping meetings and public comment period on the scope of the EIR, they prepared the Draft EIR. When the Draft EIR was released to the public on March 10, 2021, a 90-day public review period began with comments due on June 10, 2021. The draft comment letter being considered by City Council at the June 8, 2021 meeting will be finalized with any revisions and additions made by City Council and will be submitted to BCHD by the June 10, 2021 deadline.

At the close of the public review period on the Draft EIR, BCHD must prepare responses to comments and finalize the EIR. The Final EIR will be released to the public, including the responses to comments, at least 10 days prior to BCHD holding a public hearing to consider the certification of the Final EIR. Once the public hearing is concluded, BCHD may certify the Final EIR and adopt the Healthy Living Campus Master Plan. After the Final EIR is certified and BCHD has taken action on their project, BCHD may submit their application to the City of Redondo Beach for Planning Board Design Review and Conditional Use Permit and any other discretionary approval deemed necessary.

COORDINATION

The report and comments have been coordinated with the Community Development Department, the Public Works Department, Police and Fire Departments, and the City Manager's Office.

FISCAL IMPACT

The cost of preparing comments on the scope of an environmental review of a land use project within the City of Redondo Beach is part of the Public Works and Community Development Departments' annual work program and is included in the Departments' portion of the adopted 2020-2021 Annual Budget.

APPROVED BY:

Joe Hoefgen, City Manager

ATTACHMENTS

1. The BCHD Healthy Living Campus DEIR dated March 2021 is available at:
[<https://www.bchdfiles.com/docs/hlc/BCHD_DEIR_For%20Print_031021.pdf>](https://www.bchdfiles.com/docs/hlc/BCHD_DEIR_For%20Print_031021.pdf)

The appendices to the DEIR are available in individual pdf files at:
[<https://www.bchdcampus.org/deir>](https://www.bchdcampus.org/deir)

2. The BCHD Healthy Living Campus Draft Master Plan dated March 8, 2021 is available at:
[<https://www.bchdfiles.com/docs/hlc/BCHD%20HLC%20MASTER%20PLAN-20210308%>](https://www.bchdfiles.com/docs/hlc/BCHD%20HLC%20MASTER%20PLAN-20210308%)
3. City of Redondo Beach Comment Letter on the NOP Adopted July 16, 2019
4. BCHD Healthy Living Campus Draft EIR Notice of Availability
5. Draft City of Redondo Beach Comment Letter on the DEIR with Attachment