

and 3D model has not yet been developed for Alternative 6. Nevertheless, given that the alternative would reduce the height of the building by more than the required 20 feet and 3 inches identified in the Sight Line Study prepared by VIZf/x, this alternative would clearly avoid the impact described in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-1.

*Comment PF-42*

The comment notes that Table ES-2 and Table 5.5-5 of the Draft EIR do not include the impact comparison of Alternative 6. The EIR has been revised to include the impact comparison of Alternative 6 in Tables ES-2 and 5.5-5; however, it should be noted that Section 5.6, *Alternative 6 – Reduced Height Alternative* was analyzed in great detail in Section 5.0, *Alternatives*.

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**Letter WB**

June 8, 2021  
William Brand, Mayor  
City of Redondo Beach  
415 Diamond Street  
Redondo Beach, CA 90277

*Comment WB-1*

The comment expresses appreciation toward the Beach Cities Health District (BCHD) for notifying the City of Redondo Beach that Draft EIR has been published. The comment goes on to state City of Redondo Beach has prepared comments for consideration in the Final EIR. This comment has been received and incorporated into the Final EIR as a part of the responses to comments.

*Comment WB-2*

The comment provides a summary of the proposed Project, including the Phase 1 site development plan and the Phase 2 development program. Again, this comment has been received and incorporated into the Final EIR as a part of the responses to comments.

*Comment WB-3*

The comment recognizes that the Phase 2 development program was evaluated at a programmatic level, but notes that there are specific details of the development program that were not analyzed. The comment requests that any future consideration of Phase 2 should begin with a Subsequent EIR. As discussed in Section 1.1, *Overview*, the EIR evaluates the potential physical impacts of the proposed Project, which consists of a detailed preliminary site development plan for Phase 1, analyzed at a project level of detail, and a development program for Phased 2, analyzed at a

programmatic level of detail. This approach to analysis is not uncommon, and is in fact specifically called for under California Environmental Quality Act (CEQA) Guidelines Section 15165. Refer to BCHD Master Response 8 – Phase 2 Level of Detail and Programmatic Nature of the Analysis for a detailed discussion and response to comments pertaining to this issue. As described there in, if, through the development of detailed plans for such programmatic improvements, it becomes evident that later activity would have effects that were not examined in the program EIR, later analysis of the environmental effects of the activities may be required (CEQA Guidelines Section 15168[c][1]). This would likely occur in the form of a “*tiered*” CEQA analysis of the proposed Phase 2 improvements, which would involve “*narrower or site-specific environmental impact reports which incorporate by reference the discussion in any prior environmental impact report and which concentrate on the environmental effects which (a) are capable of being mitigated, or (b) were not analyzed as significant effects on the environment in the prior environmental impact report*” (California Public Resources Code Division 13, Chapter 2, Section 21068.5). Preparation of a program EIR does not relieve the applicant or lead agency from the responsibility of complying with the requirements of CEQA, which may include later, more precise, project-level analysis to fulfill CEQA requirements.

*Comment WB-4*

The comment states the EIR does not address how MM VIS-1 would be met under the proposed Project, including how or if the same square footage would be constructed and distributed across the Project site. As described in Section 3.1, *Aesthetics and Visual Resources*, MM VIS-1 is proposed to reduce the impact of the proposed Project on scenic views of the Palos Verdes ridgeline. Based on the Sight Line Study prepared by VIZf/x, the implementation of MM VIS-1 would require a reduction in the proposed height of the RCFE Building from 103 feet above the existing campus ground level (133.5 feet above the vacant Flagler Lot below) to approximately 82.75 feet above existing ground level (102.75 feet above the vacant Flagler Lot). This could be addressed through a reduction in the floor-to-floor ceiling height, recession of the building into the ground surface, or removal of the uppermost stories. In the case that the uppermost stories were removed under MM VIS-1, this square footage would not be redistributed across the Project site.

As stated in Section 5.5.6, *Alternative 6 – Reduced Height Alternative*, Alternative 6 is separately considered due to the fact that the financial feasibility of implementing MM VIS-1 was not certain at the time that the Draft EIR was prepared. For example, a reduction in floor height would remove programmable revenue-generating space in the RCFE Building and excavation to recess the building further below the ground surface would be costly. Therefore, in the event that MM VIS-1 could not be implemented an alternative would still be available to the BCHD Board of Directors

to avoid the potentially significant impact to scenic vistas identified in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-1.

*Comment WB-5*

The comment recommends that the EIR provide an alternative that addresses meeting the restriction of 0.5 floor area ratio (FAR) in the C-2 zoned parcel (i.e., the vacant Flagler Lot) should the distinct criteria for the zoning variance not be met. It should be noted that since the release of the Draft EIR and the receipt of this comment, revisions to the building footprint and associated FAR have been incorporated by pulling the building footprint further back from Beryl Street. These revisions are described in Section 2.0, *Project Description* and Section 3.10, *Land Use and Planning* of the Final EIR. This minor revision, which would reduce the development density on the vacant Flagler Lot, does not meet any of the triggers for recirculation described under California Environmental Quality Act (CEQA) Guidelines 15088.5. It should also be noted that each of the alternatives described in Section 5.0, *Alternatives* already meets the 0.5 FAR in the C-2 zoned parcel.

*Comment WB-6*

The comment requests that the EIR address the uncertainty resulting from discretion of the Planning Commission for the allowable FAR, maximum height restrictions, and setbacks in the P-CF Zone during Planning Commission Design Review. The EIR appropriately describes a reduction in height of the proposed RCFE Building necessary to avoid a potentially significant impact to scenic vistas. However, as described further in Master Response 9 – Aesthetics and Visual Resources the analysis does not find any other potentially significant impacts that would warrant further reductions in building height or additional setbacks. Alternative 6 provides a reduced height alternative in the event that the decision-makers determine that MM VIS-1 cannot feasibly be implemented. Therefore, while BCHD acknowledges the City’s discretion in the Planning Commission Design Review, the EIR is not required to speculate on the potential outcomes.

*Comment WB-7*

The comment expresses appreciation for attention to these comments and introduces additional comments on the Draft EIR in Attachment A. This comment has been received and incorporated into the Final EIR as a part of the responses to comments.

*Comment WB-8*

The comment recommends listing the reports and plans required as part of mitigation measures along with the timing and requirements of the reports/plans. Consistent with CEQA Guidelines Section 15097, a complete list of all mitigation measures required for the proposed Project, including required reports, timing, and other requirements of the mitigations, are provided in Section 11.0, *Mitigation, Monitoring, and Reporting Program* and implementation responsibilities, monitoring and reporting actions are identified in Table 11-1.

*Comment WB-9*

The comment notes that RBMC Section 10-5 is the zoning code for areas within the California Coastal Zone and states that RBMC Section 10-2 is the zoning code applicable to the Project site. After a detailed review, references to RBMC Section 10-5 in the Draft EIR were found only in Section 3.1.2, *Regulatory Setting*. References to RBMC Section 10-5 have been updated to the equivalent policies provided in RBMC Section 10-2, where applicable.

*Comment WB-10*

The comment asserts that there is no enforcement for MM GEO-2b, which requires that, in the unlikely event that any potentially significant paleontological resources are uncovered during ground disturbance or construction activities, the construction contractor temporarily cease grading in the vicinity of the find and redirect activity elsewhere to ensure the preservation of the resource and surrounding rock in which the discovery was made. As described in Section 3.6.3, *Impact Assessment and Methodology*, the methodology of the paleontological resources analysis is consistent with the Society of Vertebrate Paleontology (SVP) *Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources*. As described in SVP's guidelines, non-paleontologists may monitor for fossils for excavations in rock units determined by a qualified professional paleontologist to have low potential, such as the Quaternary-aged alluvium deposits within the Project site. If potential paleontological resources are discovered during excavations in a rock unit with low potential, all ground disturbance in the vicinity of the find should stop immediately until a qualified professional paleontologist can assess the nature and importance of the find and recommend appropriate salvage, treatment, and future monitoring and mitigation. If workers do not cease grading in the vicinity of the find, the workers and construction contractor would be subject to penalties under the applicable Federal, State, and local laws. Therefore, MM GEO-2b is consistent with the *Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources*.

*Comment WB-11*

The comment claims it is unclear why MM NOI-1 states that compliance with the City's construction hour regulations would be followed "to the maximum extent feasible. This mitigation measure has been revised to simply state that the proposed construction activities would comply with the RBMC Sections 4-24.503. However, it should be noted that RBMC Section 4.24-503 does provide limited provisions for the Building Official to permit construction activity during periods prohibited by subsection (a).

*Comment WB-12*

The comment clarifies that the Redondo Beach Public Works Department, Engineering Division is responsible for issuing after-hours construction permits. MM NOI-1 has been revised for clarification.

*Comment WB-13*

The comment states that approvals have different timeframes for various agencies and City divisions and that MM T-2 identified in the EIR should not limit an agency to a specific timeframe. MM T-2 does not limit an agency to a specific timeframe as the comment suggests, but rather MM T-2 specifies that BCHD must coordinate construction with affected agencies in advance of start of work. MM T-2 has been revised in the Final EIR to clarify that required City approvals may take up to 2 weeks or longer for each submittal.

*Comment WB-14*

The comment notes that there is no mention of compliance with the City's adopted Model Water Efficiency Landscape Ordinance in the Executive Summary. The Regulatory Setting in Section 3.15, *Utilities and Service Systems* provides RBMC Section 10-2.1900 (Landscaping Regulations), which adopts the California State Model Water Efficiency Landscape Ordinance by reference. Further, as described in Section 1.5, *Required Approvals* of the EIR, the proposed landscape plan for the proposed Project would require approval from the Redondo Beach Building & Safety Division pursuant to RBMC Section 10-2.1900. BCHD is committed to working collaboratively with the City of Redondo Beach to develop a landscape plan that is suitable for approval.

*Comment WB-15*

The comment notes that Table ES-2 of the Draft EIR does not include the impact comparison of Alternative 6. The EIR has been revised to include the impact comparison of Alternative 6 in

Tables ES-2 and 5.5-5; however, it should be noted that Section 5.6, *Alternative 6 – Reduced Height Alternative* was analyzed in great detail in Section 5.0, *Alternatives*.

*Comment WB-16*

The comment notes that the Reader’s Guide does not explain if the 0.30 to 1.50 inches of rainfall is the rate or the total and requests this be clarified in the Final EIR. As discussed in Section 3.9, *Hydrology and Water Quality*, the 85<sup>th</sup> percentile 24-hour rain event is expected to result in 0.30 to 1.50 inches of rainfall. Therefore, the 0.30 to 1.50 inches of rainfall is the rate of rain during a 24-hour period. Section 3.9 of the Reader’s Guide has been revised to clarify the rate of rainfall described.

*Comment WB-17*

The comment claims that the EIR does not mention the required Planning Commission Design Review and that permits are only described for the P-CF zone. The required Planning Commission Design Review pursuant to RBMC Section 10-2.1806 is described in Section 1.5, *Required Approvals* and various other locations throughout the EIR, including Section 3.1, *Aesthetics and Visual Resources* as well as Section 3.10, *Land Use and Planning*. Section 1.5, *Required Approvals* has been revised to clarify that the proposed development within the C-2 zone would also require a CUP.

*Comment WB-18*

The comment states that shared parking is overseen by the Redondo Beach Planning Division, rather than the Building & Safety Division. This comment has been noted and Section 1.5, *Required Approvals* has been revised to clarify the correct city division for oversight of shared parking.

*Comment WB-19*

The comment notes that the EIR does not describe whether the proposed bicycle facilities would be available to the general public or to BCHD employees only. As described in Section 3.14, *Transportation*, bicycle parking would be provided for both visitors and employees of the proposed campus. Specifically, as described in MM T-1, BCHD would be required to expand the proposed on-site bicycle facilities (i.e., shower, racks, and lockers) for BCHD employees as well as maintain and expand on-site bicycle parking for BCHD visitors in an amount and location informed by visitor surveys and annual monitoring reports. Further, as described in Section 2.5.2.1, *Proposed Uses*, the proposed Aquatics Center would include dressing rooms with lockers, restrooms, and showers for campus visitors.

*Comment WB-20*

The comment claims that a gas yard is shown on site plans but is not described in the EIR and impacts from the gas yard should be evaluated. As shown in the site plans and noted by the “(E)” next to the label for the gas yard, the gas yard is an existing feature on the Project site adjacent to the east of the existing parking structure and the perimeter road. The gas yard would not be demolished, relocated, or otherwise affected during Project construction. Therefore, no impacts would result from the existing gas yard on-site. Impacts associated with the proposed Southern California Edison (SCE) Substation have been described in detail, with additional information provided in Section 3.8, *Hazards and Hazardous Materials* as well as Section 3.11, *Noise* in response to comments received on the Draft EIR.

*Comment WB-21*

The comment requests the EIR include an analysis of impacts associated with the proposed Southern California Edison (SCE) Substation. Refer to Master Response 12 – Noise Analysis as well as Master Response 14 – Safety Concerns Regarding the Proposed Substation and Electrical Yard for a detailed discussion and response to comments pertaining to this issue.

*Comment WB-22*

The comment provides recommendations for construction activities, including using the southerly and northerly driveways along North Prospect Avenue for construction vehicles (rather than the central driveway) and considering interim preferential parking along specific westerly North Prospect Avenue (Beryl to Diamond), North Prospect Avenue frontage road, and surrounding streets (i.e., first blocks of Diamond and Beryl) to keep BCHD employees, guests/visitors and construction workers from parking in the residential neighborhood streets. These recommendations have been noted. As described in Section 3.14, *Transportation*, BCHD shall prepare, implement, and maintain a Construction Traffic and Access Management Plan subject to review and approval by the Redondo Beach Engineering Division. BCHD is committed to working collaboratively with the City of Redondo Beach to develop a Construction Traffic and Access Management Plan that is suitable for approval.

The comment also recommends providing dust and noise screening/blankets along the perimeter of the Project site. The EIR provides mitigations that would require dust and noise suppression at the Project site during construction. For example, as described in Section 3.2, *Air Quality*, MM AQ-1 would require several measures during all construction activities to control dust, including quick replacement of ground cover in exposed areas; watering of all exposed surfaces and unpaved haul roads three times daily; covering all stock piles with tarp; limiting traffic to 15 miles per hour

(mph) or less on unpaved roads; prohibiting demolition when wind speed is greater than 25 mph; sweeping streets adjacent to the project site at the end of the day if visible soil material is carried over to adjacent roads; covering or having water applied to the exposed surface of all trucks hauling dirt, sand, soil, or other loose materials prior to leaving the site to prevent dust from impacting the surrounding areas; and installing wheel washers where vehicles enter and exit unpaved roads onto paved roads to wash off trucks and any equipment leaving the site each trip. Additionally, MM NOI-1 would require the construction of noise barriers to reduce noise levels to on- and off-site sensitive receptors as well as other construction noise best management practices (BMPs) and measures to reduce construction noise levels.

*Comment WB-23*

The comment requests a list of the reports and plans required as part of mitigation measures along with the timing and requirements of the reports/plans. As described in respond to Comment WB-8, a list of all mitigation measures required for the proposed Project, including required reports, timing, and other requirements of the mitigations, is provided in Section 11.0, *Mitigation Monitoring and Reporting Program* and implementation responsibilities, monitoring and reporting actions are identified it Table 11-1.

*Comment WB-24*

The comment recommends adding Redondo Beach General Plan Land Use Element Goal 1K, Objective 1.46, and Objective 1.53 to the Regulatory Setting in Section 3.1, *Aesthetics and Visual Resources*, as they relate to the goals and policies that have already been provided. These goals and objectives have been added to Section 3.1, *Aesthetics and Visual Resources* as recommended.

*Comment WB-25*

The comment states that Redondo Beach General Plan Parks and Recreation Element Policy 8.2a.8 is only applicable to the Coastal Area of the City and therefore, is not applicable to the Project site. Policy 8.2a.8 has been removed from Section 3.1.2, *Regulatory Setting* as well as from Table 3.1.2.

*Comment WB-26*

The comment states that implementation of MM VIS-1 would reduce impacts related to privacy and shade/shadow effects, which should be discussed in the residual impacts discussion under Impact VIS-1. As described further in Master Comment Response 9 – Aesthetics and Visual Resources Analysis, CEQA requires an assessment of impacts to public views rather than private views and privacy, and the proposed RCFE Building would not create direct sight lines into private interior living spaces of nearby Torrance residences due to the distance and high angle of the views.



As described in Impacts VIS-4, shade and shadow effects associated with the proposed RCFE Building were determined to be less than significant. Nevertheless, the residual impacts discussion under Impact VIS-1 and the discussion in Impact VIS-4 have been revised to describe that the implementation of MM VIS-1 would further reduce impacts related to shade and shadow.

The comment also incorrectly claims that the EIR does not analyze the reduced height as a Project alternative. The EIR analyzes the potential impacts of Alternative 6 – Reduce Height Alternative in Section 5.0, *Alternatives*. Under Alternative 6, approximately 88,800 sf of building space would be removed from the top 2 stories of the proposed RCFE Building to avoid the potentially significant impact to scenic vistas identified in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-1. Refer to the response to Comment WB-4.

*Comment WB-27*

The comment claims that Redondo Beach General Plan Parks and Recreation Element should not be applicable to the Project site since it is not dedicated parkland. This comment has been noted and the Redondo Beach General Plan Parks and Recreation Element has been removed from the analysis in Section 3.1, *Aesthetics and Visual Resources*.

*Comment WB-28*

The comment states that the EIR describes a 121.5-foot tall building and a 133.5-foot tall building, both of which creating a 404.5-foot shadow during the Winter Solstice. This typographical error has been corrected. The City of Los Angeles CEQA Thresholds Guide (2006) states as an example of shadow multipliers that:

*“The shadow length multiplier values represent the length of a shadow proportional to the height of a given building, at specific times of day. Hence, a building of 100 feet in height would cast a shadow 303 feet long at 9:00 a.m. during the Winter Solstice.”*

Impact VIS-4 correctly describes that the RCFE Building would reach a maximum height of 103 feet above the campus ground level and 133.5 feet above the vacant Flagler Lot below. This single building is projected to cast shadows up to 404.5 feet long during the Winter Solstice.

*Comment WB-29*

The comment requests that the Draft EIR provide additional visual aids/exhibits of the proposed Project and alternatives to demonstrate compliance with referenced city goals, objectives, and policies. Section 3.1, *Aesthetics and Visual Resources* currently provides photosimulations of the proposed Project from six different representative views, which were selected in coordination with

the City of Redondo Beach. CEQA Guidelines Section 15151 states that “[a]n evaluation of environmental effects of a proposed project need not be exhaustive...” This is particularly true when analyzing impacts to public views, as there are many locations and orientations of views that could be considered in an analysis, and the consideration of all such views would be exhaustive and unreasonable. Instead, an analysis of aesthetic and visual resources need only identify those that are the most representative and would provide “...a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental considerations” (CEQA Guidelines Section 15151).

Based on the Sight Line Study prepared by VIZf/x, a licensed architect specializing in the analysis of visual resources impact, the implementation of MM VIS-1 would reduce the proposed height of the RCFE Building from 103 feet above the existing campus ground level (133.5 feet above the vacant Flagler Lot below) at least 82.75 feet above existing ground level (102.75 feet above the vacant Flagler Lot). With this reduction, the maximum height of the proposed RCFE Building would rise to just below the ridgeline of the Palos Verdes hills from 190<sup>th</sup> Street and Flagler Lane. However, as described in MM VIS-1, this revision to the final design could include the removal of the uppermost stories of the building and/or recessing the building foundation further into the ground surface. While the preferred method would be to reduce the floor-to-ceiling heights to accommodate the height, a detailed design and 3D model has not yet been developed. Therefore, a detailed, photorealistic simulation cannot be prepared at this time. However, MM VIS-1 very clearly describes the requirements to reduce the impact to less than significant based on robust technical study independently prepared by a licensed architect (i.e., by avoiding the interruption of the Palos Verdes ridgeline when viewed from Representative View 6).

*Comment WB-30*

The comment suggests adding Redondo Beach General Plan Land Use Element Policies 1.55.8-1.55-10 to Section 3.3, *Biological Resources*. These policies along with Policy 1.55.7, which establish water conservation strategies through irrigation and landscaping, are applicable to the assessment of water demand or supply in Section 3.15, *Utilities and Service Systems*. Accordingly, these policies have been added to Section 3.15.2, *Regulatory Setting*.

*Comment WB-31*

The comment notes that the existing buildings on-site have not been formally reviewed by the Redondo Beach Preservation Commission and that it would be more accurate to state in Section 3.4, *Cultural Resources* that the buildings are not identified as potential resources in the City’s Historic Resource Survey. The language in Section 3.4.1, *Environmental Setting* has been revised

to more accurately describe the review process for these buildings, consistent with this recommendation.

*Comment WB-32*

The comment notes that the property at 328 N. Gertruda Avenue is one of many properties within the Gertruda Avenue Historic District and that the entire district should be referenced in Table 3.4-1 within Section 3.4, *Cultural Resources and Tribal Cultural Resources*. It should be noted that the City of Redondo Beach Historical Resources Register does not identify the property at 328 N. Gertruda Avenue as being within the Gertruda Avenue Historic District and the Historic District list does not include this property. Rather the City of Redondo Beach's Historical Resources Register lists the property at 328 N. Gertruda Avenue within the Original Townsite Historic District, as noted in Table 3.4-1 of the Draft EIR. Nevertheless, given that the Original Townsite Historic District and Gertruda Avenue Historic District are partially located within 0.5 miles of the Project site, these historic districts have been added to Table 3.4-1. The title of Table 3.4-1 has been revised to clarify that it includes Historic Architectural Resources in Redondo Beach within 0.5 miles of the Project site.

*Comment WB-33*

The comment suggests clarifying in Table 3.4-1 that the property at 820 Beryl Street is a potentially historic resource within the City of Redondo Beach's Historic Resource Survey, but is not currently designated as a local landmark. Table 3.4-1 clearly states that the status of the property at 820 Beryl Street is "Locally Significant," rather than "Local Landmark" as described for the Morrell House and Queen Anne House at Dominguez Park. However, an additional note has been added to Table 3.4-1 to further clarify that the "*property located at 820 Beryl Street was determined to be a potentially historic resource within the City of Redondo Beach's Historic Resource Survey; however, this property has not been designated as a Local Landmark.*"

*Comment WB-34*

The comment states that the cities of Redondo Beach and Torrance shall have oversight and enforcement capabilities to ensure BCHD complies with the recommendations and specifications of the Geotechnical Report prepared for the proposed Project. As described in MM GEO-1, City of Redondo Beach and City of Torrance permit compliance staff shall observe and ensure compliance with the recommendations and specifications of the Geotechnical Report during grading and construction activities associated with the proposed Project. MM GEO-1 has been revised to further clarify that BCHD would be required to comply with the recommendations and specifications of the Geotechnical Report and that the cities would be required to review all final

grading plans, design drawings, and construction plans, as appropriate, and observe earthwork and grading to ensure compliance with these recommendations and specifications.

*Comment WB-35*

The comment claims that there is no enforcement for MM GEO-2b, which requires that, in the unlikely event that any potentially significant paleontological resources are uncovered during ground disturbance or construction activities, the construction contractor temporarily cease grading in the vicinity of the find and redirect activity elsewhere to ensure the preservation of the resource and surrounding rock in which the discovery was made. Refer to the response to Comment WB-10.

*Comment WB-36*

The comment states that MM GEO-2a does not provide contingency for employees that may be hired mid-project after initial training has been conducted. However, MM GEO-2a requires that all workers attend awareness training regarding the paleontological resources that may occur onsite. As described in MM GEO-2a, the qualified paleontologist shall develop worker attendance sheets to record workers' completions of the awareness session. Further, MM GEO-2a requires that BCHD provide awareness session sign-in sheets documenting employee attendance to the City of Redondo Beach and City of Torrance permit compliance staff, if requested. To further ensure enforcement of the worker awareness training for workers starting after the initial awareness training, MM GEO-2a has been revised to include that the worker awareness session for paleontological resources shall occur, "*prior to the initiation of excavation and grading activities or prior to the start of work on-site for new workers hired after the initial awareness session.*"

*Comment WB-37*

The comment suggests including Redondo Beach General Plan Transportation and Circulation Element Policy 16 in Section 3.7, *Greenhouse Gas Emissions and Climate Change*. Policy 16 has been added to Section 3.7.1, *Regulatory Setting*.

*Comment WB-38*

The comment suggests altering the description of Project 12 and adding another similar Caltrans project in Table 3.0-1 in Section 3.0.2, *Cumulative Impacts*. These projects have been revised in Table 3.0-1, as recommended.

*Comment WB-39*

The comment states that volatile organic compounds (VOCs) should be remediated to the required regulatory standards and measures in place, and ensure that future contamination does not further migrate from the possible source onto the site. As described in Section 3.8, *Hazards and Hazardous Materials*, the implementation of MM HAZ-2a through -2d would ensure VOC compounds and contaminated soils are properly detected, removed, and handled during ground disturbing activities. For example, MM HAZ-2a would require preparation and implementation of a Soils Management Plan, which would be subject to review by the City of Redondo Beach as well as the Los Angeles County Fire Department (LACoFD) Health Hazardous Materials Division, Los Angeles Regional Water Quality Control Board (RWQCB), and City of Torrance. MM HAZ-2b and -2c would require soil vapor monitoring and soil vapor extraction equipment. MM HAZ-2d would require that construction activities cease in the event that previously unknown or unidentified soil and/or groundwater contamination. With implementation of MM HAZ-2a through -2d, the risk of an accidental release of hazardous materials into the environment during construction of the proposed Project would be less than significant with mitigation.

*Comment WB-40*

The comment suggests that BCHD should properly mitigate and follow regulatory requirements and construction standards for known oil well locations. As described further in Master Response 11 – Hazards and Hazardous Materials pursuant to MM HAZ-3, BCHD has enrolled into the California Geologic Energy Management Division (CalGEM) Well Review Program, which provides guidance, assistance, and recommendations for projects in the vicinity of oil and gas wells to protect the public health and avoid future liabilities. The proposed Project has been designed to comply with all applicable CalGEM recommendations including reabandonment and avoiding construction of permanent structures in close proximity to the well, which is defined as a distance of 10 feet. The proposed Project has been designed to meet these criteria by restricting development in this area on the vacant Flagler Lot to a one-way driveway and pick-up/drop-off zone rather than a habitable structure. Through enrollment in CalGEM’s Well Review Program and compliance with CalGEM’s advisory information to address significant and potentially dangerous issues associated with development near oil or gas wells, impacts would be less than significant with mitigation.

*Comment WB-41*

The comment expresses concern that the Redondo Beach Local Hazard Mitigation Plan was not considered in the analysis presented in Section 3.8, *Hazards and Hazardous Materials*. As

described in Section 3.8.2, *Regulatory Setting*, the LACoFD Health Hazardous Materials Division and RBFD work together to implement the Redondo Beach Local Hazard Mitigation Plan that addresses the City's planned response to emergencies. Section 3.8.2, *Regulatory Setting* has been updated to include further discussion of the Redondo Beach Local Hazard Mitigation Plan.

*Comment WB-42*

The comment claims that the proposed Project would require a zoning variance given that it would exceed the 0.5 FAR in the C-2 zoned parcel (Flagler Lot) and that the EIR should consider alternative to the proposed Project if findings for a variance cannot be made. Refer to the response to Comment WB-5.

*Comment WB-43*

The comment suggests including several policies from the Redondo Beach General Plan Noise Element in Section 3.11, *Noise*. Redondo Beach General Plan Noise Element Goal 10.4 and Policies 10.4.1 and 10.4.5; Policies 10.5.1 and 10.5.5; Goal 10.6 and Policies 10.6.1 and 10.6.2; and Goal 10.8 and Policy 10.8.1 have been added to Section 3.11.1, *Regulatory Setting*.

*Comment WB-44*

The comment requests the EIR include an analysis of operational noise impacts from the proposed electrical yard and gas yard areas. As previously described, the gas yard is an existing feature on the site and would not be affected by the proposed Project. As described in Master Response 12 – Noise Analysis, Section 3.11, *Noise* of the EIR has been revised to include discussion of the potential for operational noise impacts from the proposed substation.

*Comment WB-45*

The comment requests consideration of the potential for indirect impacts related to population increase associated with Redondo Beach dwelling units being vacated to move into the proposed Assisted Living units, which would free up dwelling units for the average 2.34 persons per household. This comment has been noted. The discussion in Impact PH-1 has been revised to clarify that even with the conservative assumption that all of the proposed 157 new Assisted Living units are occupied by Redondo Beach residents that currently live alone, and that all of their Redondo Beach residences are filled with new residents from outside of the Redondo Beach area at an average rate of 2.34 persons per household, the maximum population increase would be 367, which would still be less than 1 percent (i.e., 0.55 percent) of the Redondo Beach population.

*Comment WB-46*

The comment implies the EIR does not consider the potential conflict with access to Flagler Lane for BCHD employees and visitors. However, it should be noted that the driveways along Flagler Lane would not provide access to long-term parking on the BCHD campus and as such, would not be a primary entrance for BCHD employees and visitors. The primary entrances to the Project site would continue to be provided along North Prospect Avenue. Additionally, as noted in Section 3.10, *Land Use and Planning* and Section 5.0, *Alternatives*, the one-way driveway and pick-up/drop-off zone exit onto Flagler Lane as well as the service area and loading dock entry/exit onto Flagler Lane may potentially be inconsistent with TMC Section 92.30.8, which prohibits site access to commercial properties from local streets when access from an arterial road is available. As such, Section 5.0, *Alternatives* considers four alternatives (i.e., Alternatives 3, 4, 5, and 6) that would include an alternative access and circulation design at the Project site, with a right-turn access from Beryl Street and no vehicle entry/exit onto Flagler Lane.

*Comment WB-47*

The comment recommends noting that the Construction Traffic and Access Management Plan required under MM T-2 would be subject to review and approval by the City of Torrance rather than the County Department of Transportation (DOT). Given that the proposed construction haul trucks would travel along regional highways, the Construction Traffic and Access Management Plan is subject to review and approval by County DOT. However, the City of Torrance Community Development Department has been added to the list of reviewers under MM T-2 given that the proposed construction haul routes would also travel through the City of Torrance.

*Comment WB-48*

The comment suggests that while MM T-2 states, that “[t]rucks shall only travel on approved construction routes. Truck queuing/staging shall only be allowed at approved locations. Limited queuing may occur on the construction site itself,” it should further state that “[n]o truck queuing/staging shall occur on any public roadway in the vicinity of the Project site.” This comment has been noted. MM T-2 clearly states that truck queuing/staging would be allowed at approved locations only. MM T-2 further states that the required Construction Traffic and Access Management Plan would be subject to review and approval by the City of Redondo Beach Engineering Division, among other agencies. As previously described, BCHD is committed to working collaboratively with the City of Redondo Beach to develop a Construction Traffic and Access Management Plan that is suitable for approval.

*Comment WB-49*

The comment recommends including Redondo Beach General Plan Utilities Element Policy 6.1.10 to Section 3.15, *Utilities and Service Systems*. Objective 6.1 and Policy 6.1.10 have been added to Section 3.15.2, *Regulatory Setting*.

*Comment WB-50*

The comment suggests adding Redondo Beach General Plan Land Use Element Policies 1.55.7-1.55.9 to Section 3.15, *Utilities and Service Systems*. As described in response to Comment WB-30, these policies have been added to Section 3.15.2, *Regulatory Setting*.

*Comment WB-51*

The comment recommends including Redondo Beach General Plan Utilities Element Policies 6.1.5, 6.2.3, and 6.2.7 to Section 3.15, *Utilities and Service Systems*. This comment has been noted. Objective 6.2 and Policies 6.1.5, 6.2.3, and 6.2.7 have been added to Section 3.15.2, *Regulatory Setting*.

*Comment WB-52*

The comment incorrectly claims that Impacts UT-3 and UT-4 do not address the potential for impacts on the City of Redondo Beach sewage collection system or the Los Angeles County Sanitation District (LACSD) transmission system. The increase in operational wastewater generation at the Project site and associated effects on the local sewer system and LACSD sewer lines resulting from implementation of the proposed Project are discussed under Impact UT-3. As described under Impact UT-3, the Sewer Capacity Study prepared for the proposed Project determined that the existing buildings on the Project site generate a peak daily demand of 68,925 gallons per day (gpd), which flows into the 8-inch local sewer main in North Prospect Avenue and away from the Project site to the southeast. The existing sewer main capacity is 668,593 gpd. Using wastewater generation factors from the City of Los Angeles CEQA Thresholds Guide (2006), Phase 1 of the proposed Project would decrease existing wastewater generation by approximately 6,319 gpd and Phase 2 of the proposed Project would increase the amount of wastewater currently transported by the sewer system by approximately 47,361 gpd from existing conditions.

To ensure that wastewater flows would be adequately accommodated, sewer lines are reviewed based on the guidelines for sewer design and operations from the Los Angeles Bureau of Engineering Manual – Part F. The Sewer Capacity Study concluded, even with the increase in sewage flow associated with the proposed Project, proposed flows would remain below a 50 percent flow depth to diameter ratio, and the existing 8-inch sewer line along Diamond Street



would adequately accommodate the proposed sewer flow without upgrades. Therefore, the proposed Project and would not exceed existing infrastructure capacity.

The EIR further describes in Impact UT-3 that the proposed Project wastewater would continue to flow from the local sewer line along Diamond Street to the LACSD South Bay Cities Main Trunk Sewer, located in Gertruda Avenue at Catalina Avenue. The LACSD's 20-inch diameter lined trunk sewer has a capacity of 2.4 million gallons per day (mgd) and conveyed a peak flow of 0.3 mgd when last measured in 2015. As such, the LACSD main trunk sewer has a remaining sewer capacity of approximately 2.1 mgd and the increase in sewage flow of 0.047 mgd associated with the proposed Project would not exceed the LACSD sewer capacity. Therefore, implementation of the proposed Project would result in a less than significant impact on existing wastewater infrastructure. Please refer to Impact UT-3 in Section 3.15, *Utilities and Service Systems* for a full discussion of the potential for impacts on the City of Redondo Beach sewage collection system or the LACSD transmission system.

*Comment WB-53*

The comment criticizes the discussion of the possibility of rezoning for mixed-use or multi-family under Alternative 2 – Closure, Sale, and Redevelopment of the BCHD Campus since a number of uses could be requested and serve different purposes. Under Alternative 2 – Closure, Sale, and Redevelopment of the BCHD Campus, BCHD would not demolish, retrofit, or otherwise redevelop any of the facilities on the existing campus, but would instead divest itself of these existing facilities and its current programs and services. Following closure of the Beach Cities Health Center, BCHD would sell the campus and the vacant Flagler Lot for redevelopment of uses permitted under the P-CF zone district of those that the new owner choose to pursue. This could include the sale of both parcels in their entirety or subdivision and a sale of a portion thereof. Alternative 2 – Closure, Sale, and Redevelopment of the BCHD Campus discusses a range of potential development scenarios, including uses permitted under the P-CF and C-2 zones, uses that would be permitted with a CUP, and uses that could be permitted with a zoning change. Therefore, the discussion of Alternative 2 – Closure, Sale, and Redevelopment of the BCHD Campus discusses the possibility of a number of different uses of the site.

*Comment WB-54*

The comment notes that Table 5.5-5 of the Draft EIR do not include the impact comparison of Alternative 6. Table ES-2 and Table 5.5-5 have been revised to correct this inadvertent omission; however, Section 5.6, *Alternative 6 – Reduced Height Alternative* was analyzed in detail in Section 5.0, *Alternatives*.