Importantly, it should be noted that the Construction Traffic and Access Management Plan limits work within the public right-of-way to the period between 9:00 a.m. and 4:00 p.m. (This work includes dirt and demolition material hauling and construction material delivery.) The request to further limit construction vehicles from traveling on Del Amo Boulevard and West 190th Street 15 minutes before and after the school start and end bells at Tower Elementary School and West High School would require additional coordination between BCHD, Towers Elementary School, and West High School given that the bell schedules change from day-to-day, are different for students of different grades (e.g., between 1st grade and 5th grade), and are not the same between the two schools. Nevertheless, as a part of the notification and coordination described under MM NOI-1 and MM T-2, BCHD is committed to ongoing coordination and revisions to the construction schedule ahead of and during the proposed construction activities, to accommodate the two schools to the maximum extent practicable.

It should also be noted that BCHD has revised the proposed haul routes (refer to the response to Comment KB-3), which TUSD has acknowledged would reduce potential impacts at Towers Elementary School. Refer also to Master Response 13 – Transportation Analysis for additional detailed discussion related to the revised construction haul routes.

Letter PF

June 3, 2021
Patrick Furey, Mayor
City of Torrance
3031 Torrance Boulevard
Torrance, CA 90503

Comment PF-1

The comment introduces the attached letter and associated comments from the City of Torrance Mayor, Patrick Furey. This comment has been received and incorporated into the Final Environmental Impact Report (EIR) as a part of the responses to comments.

Comment PF-2

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

Comment PF-3

The comment expresses concern for the Torrance residents living adjacent to the east of the Project site and requests consideration of additional alternatives and mitigation measure to reduce the potential impacts, such has repositioning the Residential Care for the Elderly (RCFE) Building further west, which each floor stepping back farther from Flagler Lane as building height increases and removing Project site access from Flagler Lane. This comment has been received, incorporated into the Final EIR as a part of the responses to comments, and will be advanced to decision makers for further consideration during deliberations on the proposed Healthy Living Campus Master Plan.

With regard to the proposed site plan associated with the RCFE Building, it should be noted that the Beach Cities Health District (BCHD) has already revised the building footprint to minimize the adjacency of the building with the single-family residential neighborhood to the east within the City of Torrance. As summarized in Master Response 9 – Aesthetics and Visual Resources Analysis, the 2019 Master Plan included approximately 1,100 feet of frontage along Flagler Lane, Flagler Alley, and the adjacent single-family residential neighborhood; in contrast, under the proposed Project, the RCFE Building would have a street frontage of approximately 400 feet along Flagler Lane and the adjacent single-family residential neighborhood to the east. In order to accomplish this revision to the design of the RCFE Building, the total occupied building area was reduced from 592,700 square feet (sf) to 484,900 sf and the number of Assisted Living units and Memory Care units was reduced from 420 to 217 units. In addition to reducing the total occupied area and the number of units, the height of the RCFE Building was also raised from 4 stories to 7 stories to further minimize the total building footprint. However, the bulk and mass of the RCFE Building was focused behind the Redondo Village Shopping Center, which provides a setback of 250 feet and also forms a step-down in building height to the single- and multi-family residential development along Beryl Street.

BCHD is unable to locate the building footprint further to the west due to the constraints associated with the existing BCHD campus. The building footprint must accommodate the continued operation of the Beach Cities Health Center as well as the Providence Little Company of Mary Medical Institute Building during construction. The site plan must also accommodate internal circulation roads and pathways between these buildings. Further, while BCHD is considers ways to accommodate floor to ceiling height reductions to achieve Mitigation Measure (MM) VIS-1, additional stepbacks in the RCFE Building cannot be accommodated without a substantial reduction in Assisted Living units and Memory Care units. As previously noted the number of units was already reduced by nearly 50 percent. Further reductions would not achieve the project

objectives related to revenue generation, based in part on the three market studies prepared by MDS Research Company, Inc., a nationally recognized consulting firm focused on the senior living and healthcare market sectors, and independently review by Cain Brothers (refer to Master Response 5 – Affordability of RCFE Assisted Living and Memory Care Units). Additional discussion has been added to Section 5.4, *Alternatives Considered but Rejected from Further Analysis* to further describe these constraints.

As acknowledged in 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 Torrance Municipal Code (TMC) Section 92.30.8, which prohibits site access to commercial properties from local streets when access from an arterial road is available. BCHD also recognizes that the City of Torrance is now considering the potential removal of the southbound vehicle movement along Flagler Lane between Beryl Street and Towers Street and that this change to the transportation network would prevent service vehicles from entering the subterranean service area and loading dock under the proposed RCFE Building. Therefore, Alternatives 3, 4, 5, and 6 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 (refer to Section 5.5, *Alternatives Analysis*).

Comment PF-4

The comment asserts that the environmental analysis of the Phase 2 development program is vague. 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 Phase 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 PF-5

The comment expresses appreciation for attention to these comments and introduces additional comments that the City of Torrance received on the Draft EIR, provided as Attachment B to Letter PF. The comments in Attachment B have been received, reviewed, and found to be duplicative with the comments that have been individually submitted to BCHD on the Draft EIR. For example, the comments provided by Torrance Redondo Against Overdevelopment are directly responded to in Letter TRAO (see Section 9.3.3, *Neighborhood Organizations*).

Comment PF-6

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. Table ES-2 and Table 5.5-5 have been revised to correct this inadvertent omission; 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 PF-7

The comment asserts that the description of zoning surrounding the Project site is incorrect. Section 2.2.2, *Surrounding Land Uses* of the EIR has been revised, as requested, to describe the zoning surrounding the Project site, in addition to the General Plan land use designations. However, it should be noted that the environmental impact analysis provided throughout the EIR already considers these adjacent residences as well as Towers Elementary School to be sensitive receptors (e.g., refer to Table 3.11-16 and Table 3.11-17 in Section 3.11, *Noise*).

Comment PF-8

The comment states that the Draft EIR incorrectly references TMC Section 13.9.7 as the sole decision-making body of the City of Torrance for the proposed RCFE Building and states that the retaining walls located in City of Torrance right-of-way would be subject to discretionary review by the Torrance Planning Commission per TMC Section 92.13.12(d). To clarify, Section 2.5.1.2, *Project Architecture and Design* does not state that TMC Section 13.9.7 is the sole decision-making body of the City of Torrance for the proposed RCFE Building, but rather describes the applicable policies and regulations for the proposed RCFE Building. In fact, Section 1.5, *Required Approvals* specifically acknowledges that the proposed Project would require *"City Engineer*

approval of a building permit for retaining walls associated with the service area and loading dock entry/exit pursuant to TMC Section 92.13.2 (Torrance Engineering Division)."

Comment PF-9

The comment states that coordination with the Torrance Fire Department (TFD) and the Torrance Police Department (TPD) is required to prepare an Emergency Response Plan should emergency access to the campus on Flagler Lane continue to be proposed, given that Flagler Lane is within the City of Torrance. Section 2.5.1.3, *Proposed Access, Circulation, and Parking* of the Draft EIR has been revised to clarify that BCHD would also coordinate with the TFD and TPD to prepare an Emergency Response Plan for elements of the proposed Project within the jurisdiction of the City of Torrance. Refer to the response to Comment PF-3 regarding the proposed access along Flagler Lane.

Comment PF-10

The comment states that the proposed construction haul routes for the proposed Project are not consistent with the consistent with the Torrance General Plan Circulation & Infrastructure Element Figure CI-3 Truck Routes and Rail Lines, specifically the portion of Del Amo Boulevard between Madrona Avenue and Hawthorne Boulevard. The construction haul routes proposed in the Draft EIR have been revised to avoid construction traffic conflicts. The segment of Del Amo Boulevard between Madrona Avenue and Hawthorne Boulevard would be avoided in compliance with CI-3 Truck Routes and Rail Lines in the City of Torrance General Plan Circulation and Infrastructure Element. Refer to the response to Comment KB-3 as well as the Master Response 13 – Transportation Analysis for additional detailed discussion and response to comments pertaining to the revised construction haul routes.

Comment PF-11

The comment asserts that the description of the environmental setting along Flagler Lane is incomplete and must include descriptions of the single-family residential neighborhood to the east of the Project site and the school drop-offs and pick-ups at Towers Elementary School. Section 3.1.1, *Environmental Setting* of the Draft EIR has been revised to describe that between Beryl Street and Towers Street, Flagler Lane supports single-family residences within the City of Torrance as well as school drop-offs and pick-ups at Towers Elementary School. However, it should be noted that the EIR thoroughly describes the transportation network adjacent to the Project site within more applicable sections of the EIR (e.g., Section 3.14, *Transportation*).

Comment PF-12

The comment states that the City of Torrance was not consulted on the selection of representative views, and that the Draft EIR must consider the potential impacts to public views from locations at the cul-de-sac at Tomlee Avenue facing west and southwest, intersection at Towers Street and Mildred Avenue facing west, and intersection at Tomlee Avenue and Mildred Avenue facing west and northwest. However, for the following reasons, additional representative views from each of these locations were not selected to inform the analysis of aesthetics and visual resources in this EIR.

1. Cul-de-sac at Tomlee Avenue: Views from this location are largely obstructed by residential development and are already represented by Representative View 2 located approximately 330 feet to the southwest of the cul-de-sac. Additionally, Representative View 3, which is located 200 feet northwest of the cul-de-sac, provides direct uninterrupted views of the Project site at a location that is more heavily frequented by pedestrian foot traffic, bicycles, and vehicles.

2. Towers Street & Mildred Avenue Intersection: Views of the Project site from this location are located farther from the Project site and are already largely represented by Representative View 3, which is located approximately 300 feet to the west. Representative View 2 (Towers Street & Flagler Lane) was selected as it provides a much more direct view of the Project site from the same view direction.

3. Tomlee Avenue & Mildred Avenue Intersection: As described for the Towers Street & Mildred Avenue intersection, views of the Project site from this location are farther from the Project site and already largely represented by Representative View 3, located approximately 230 feet to the west and closer to the Project site.

To fully and accurately assess potential impacts associated with aesthetics and visual resources, a total of six representative views were selected to provide representative locations from which the Project site would be seen from public streets, sidewalks, and recreational resources in the Project vicinity. Two of these representative views – Representative Views 1 and 2 – are located within the residential neighborhood located directly to the east of the Project site, within the City of Torrance, while Representative View 3 is located at the corner of Dominguez Park directly adjacent to City of Torrance boundary. Many views elsewhere within the City of Torrance are often further away and views of the Project site are largely obstructed or obscured by existing development, trees, and power lines. These representative views were selected as they provide some of the greatest and most direct views of the Project site within the City of Torrance and are

generally representative of similar views from other areas within the City of Torrance. 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 views that are the most representative and 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).

Comment PF-13

The comment requests that the Draft EIR consider the potential Project impacts on surrounding properties, specifically the residential neighborhood to the east, and the potential impact of the proposed Project to the existing uses in accordance with Torrance General Plan Land Use Element Policy 2.3. The Draft EIR does in fact consider the potential impacts on surrounding properties, including the residential neighborhood located adjacent to the east of the Project site, throughout the EIR. For example, two of the six representative views analyzed under Impact VIS-2 in Section 3.1, *Aesthetics and Visual Resources* are located within this residential neighborhood. Residences within this neighborhood are also described as sensitive receptors in Section 3.2, *Air Quality* as well as Section 3.11, *Noise* and as such, air quality and noise impacts to these receptors are thoroughly analyzed and mitigated to the maximum extent feasible in the EIR. Additionally, Section 3.14, *Transportation* of the Draft EIR describes the current level of cut-through traffic within this residential neighborhood and analyzes the potential for additional cut-through traffic during operation of the proposed Project. Therefore, the Draft EIR does consider the potential for Project-related impacts on surrounding property, including the residential neighborhood to the east of the Project site, in accordance with Torrance General Plan Policy LU.2.3.

The comment also requests that the Draft EIR consider the potential impacts to landscape and hardscape buffers, specifically where the slope between the Project site and the residential neighborhood to the east, to minimize adverse effects where appropriate in accordance with Torrance General Plan Land Use Element Policy 2.5. Torrance General Plan Policy LU.2.5 states *"Establish landscape or hardscape buffers between residential and non-residential uses, where appropriate, to minimize adverse effects."* As described in Section 2.5.1.1, *Proposed Uses* of the Draft EIR, *"[t]he perimeter of the campus would be planted with a mix of grasses, shrubs, ground cover, and shade trees that are adapted to the climate of Southern California. The western border (along North Prospect Avenue) and eastern border (along Flagler Alley, Flagler Lane, and*

Diamond Street) of the campus would be lined with intermittent large shade canopy trees and smaller shade trees to provide landscape screening." As described in Section 2.5.1.1, perimeter green space and landscaping would be intended to soften the campus interface and provide connections with the surrounding uses. Therefore, the proposed Project would provide landscape buffers between the Project site and surrounding residential areas to minimize adverse impacts, consistent with Torrance General Plan Policy LU.2.5. Section 1.5, *Required Approvals*, also acknowledges that the Landscape Plan within the City of Torrance right-of-way would require *"approval pursuant to TMC Section 92.30.6 (Torrance Community Development Department)."*

Lastly, the comment states that the Torrance General Plan was adopted in 2010 and that Draft EIR incorrectly cites the Torrance General Plan as 2005. However, this 2005 reference is for the Torrance General Plan Land Use Policy Map, which uses geographic information system (GIS) data from 2005 (refer to Section 7.0, *References*). Other references to the Torrance General Plan throughout the EIR (e.g., Section 3.10, *Land Use and Planning*) accurately describe that the adoption in 2010.

Comment PF-14

The comment corrects the numbering of Torrance General Plan Community Resources Element Policy CR.1.2 and Objectives CR.4 and CR.19, which were swapped in the Draft EIR. The regulatory setting has been revised to correctly reference Torrance General Plan Community Resources Element policies and objectives. Additionally, Policy CR.4.3 is included in Table 3.1.3 of the Draft EIR to describe the proposed Project's consistency with this policy; however, this policy has also been added to Section 3.1.2, *Regulatory Setting* as requested by this comment. As described in the response to Comment PF-13 above, the proposed Project would provide landscape buffers between the Project site and surrounding residential areas to minimize adverse impacts, consistent with Torrance General Plan Policy LU.2.5 as well as Policy CR.4.3.

Comment PF-15

The comment states that the Draft EIR must include TMC Section 92.30.2 to address the potential impacts on surrounding property, specifically the residential neighborhood to the east, from outside equipment and roof and wall appurtenances, such as ducts and vents, all mechanical equipment, electrical boxes, meters, pipes, transformers, air conditioners and all other equipment on the roof or walls on all Project buildings. TMC Section 92.30.2 has been added to the regulatory setting as requested by this comment. As described in Table 3.1-2, mechanical equipment included in the proposed Project would be sited away from public streets and would be screened by proposed landscaping and other screening devices consistent with the architecture and color of the proposed

development. Therefore, the proposed mechanical equipment would be screened in compliance with RBMC Section 10-2.1530 as well as TMC Section 92.30.2.

The comment also claims that the EIR must include TMC Section 92.30.3, which includes restrictions on the enclosures of trash, loading, and storage areas to address the potential impacts on surrounding property, specifically the residential neighborhood to the east across Flagler Lane. However, as described in Section 2.5.1.4, *Utilities and Services*, trash and recycling collection facilities for residents, employees, and visitors would be provided within enclosures in the subterranean service and delivery zone below the proposed RCFE Building. This area would not be located within the City of Torrance right-of-way and would not be subject to TMC Section 92.30.3 (see the response to Comment PF-17). However, this element of the proposed Project would be subject to RBMC Section 10-5.1536 (Solid Waste Enclosures), which provides requirements for solid waste facilities, including the enclosures, material, access gate, and location of the solid waste facilities.

Comment PF-16

The comment requests that the Draft EIR consider further reduction of the RCFE Building height to preserve greater panoramic views of the Palos Verdes hills as currently viewed from Representative View 6 located at the Flagler Lane & 190th Street intersection. The comment also suggests that the EIR include visual aids/exhibits to demonstrate alternative methods for mitigation as well as the potential impacts to the existing view corridor resulting from Phase 2 development. However, the analysis in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-1 already provides a detailed computer-generated photosimulation demonstrating the potential impact to visual resources. Based on the Sight Line Study prepared by VIZf/x, the implementation of Mitigation Measure (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 190th Street & 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).

As described in Impact VIS-1, the Phase 2 development program would result in the construction of a new building(s) ranging in height from 53 feet to 68 feet above ground level and a new parking structure, reaching a maximum height of 76 feet. However, given the height of the proposed development in Phase 2, it would not be visible behind the proposed RCFE Building. Therefore, the Phase 2 development program would not affect the wide-ranging panoramic view of the Palos Verdes ridgeline from Representative View 6 and no further visual aids or analyses are required.

The comment also recommends consideration of alternative mitigation measures, such as methods for mitigation including repositioning the RCFE Building further west with each floor stepping back farther from Flagler Lane as building height increases to maintain an existing view corridor from the intersection of 190th Street & Flagler Lane. However, repositioning the building or requiring stepbacks in building height would not address the interruption of the Palos Verdes ridgeline. As described in Impact VIS-1 and MM VIS-1 a reduction in the total building height is required. Nevertheless, it should be noted that the proposed Project would be subject to a Planning Commission Design Review (Redondo Beach Municipal Code [RBMC] Section 10-2.1116) and these comments will be provided to the BCHD Board of Directors as well as the City of Redondo, as a responsible agency for consideration during deliberation on the proposed Healthy Living Campus Master Plan.

Comment PF-17

The comment claims that the analysis provided in Section 3.1, *Aesthetics and Visual Resources* under Impact VIS-2 is not consistent with the Torrance General Plan and asserts that the proposed RCFE Building would change the visual character of the Project site. The comment specifically notes that the building would be visually prominent, substantially taller than the existing buildings on-site, and larger than the buildings in the vicinity.

It should be noted that the EIR very clearly acknowledges the height of the proposed building. For example, refer to Table 3.1-1 which describes the relationship of the proposed RCFE Building to other buildings within the Beach Cities and Torrance over 70 feet in height. As described for Representative View 2, Representative View 3, and Representative View 4, the proposed RCFE Building would be visually prominent and would noticeably alter the existing views of the Project site from these locations, including reducing blue sky views. However, the development plan would not substantially degrade the visual character or quality of the Project site and surrounding area when viewed from these locations. In fact, the proposed Project includes many attributes that

would improve the visual character of the Project site and surrounding vicinity. For example, the design of the proposed RCFE Building includes exterior façades with simple forms constructed using white concrete floor slabs infilled with painted panels and glass to provide visual interest. The ground floor of the RCFE Building would include predominantly glass walls to allow public views of active green spaces located within the interior of the campus. Additionally, the proposed perimeter green space and ornamental landscaping would be used to soften the campus interface and provide connections with the surrounding uses along North Prospect Avenue, Beryl Street, Flagler Lane and Flagler Alley, and Diamond Street. The landscape plan would include a mix of grasses, shrubs, ground cover, and shade trees that are adapted to the climate of Southern California. Shade canopy trees and smaller shade trees would be used to screen direct views of the proposed RCFE Building façade from surrounding public views. Further, ornamental flowering street trees would be included along the Project site's North Prospect Avenue and Beryl Street frontages to activate and improve the pedestrian character of the public realm.

With regard to the Phase 2 of the proposed Healthy Living Campus Master Plan, the analysis provided in Impact VIS-2 does programmatically assess the proposed development. To accomplish this, the analysis uses visual renderings for three example site plans and describes the potential impacts associated with the maximum buildings heights. Take for example the discussion of the proposed parking structure when viewed from Representative View 1 within the City of Torrance:

> *"Each of the example site plan scenarios would involve the construction of a multi-level parking structure along the eastern perimeter of the Project site. This would result in a net increase in the overall height compared to the existing parking structure at 512 North Prospect Avenue, which currently provides 3 above ground levels. Under any of the example site plan scenarios the proposed parking structure would likely be visible from Representative View 1, located within the Torrance neighborhood to the east of the campus. However, at a maximum height of 81 feet, this parking structure would be more than 20 feet shorter than the proposed RCFE Building. As such, the parking structure would be just barely visible over the single-family houses and would not substantially obscure the view of the open sky above."*

Refer to the response to Comment PF-3 regarding the suggest repositioning or stepdown in building heights.

Comment PF-18

The comment expresses concern regarding lighting impacts to the residential neighborhood east of the Project site, including from surface level parking lot, building, and landscape lighting. The

surface parking lots associated with the proposed Project would be located at the southern and western portions of the Project site would not affect residences to the east of the Project site within the City of Torrance given the distance, change in elevation, and obstruction by buildings on the Project site. As described in Impact VIS-3, outdoor lighting at the Project site would be shielded so as not to produce obtrusive glare onto the public right-of-way or adjacent properties in accordance with TMC Section 92.30.5 and these design guidelines. Lighting on-site would also be screened by proposed trees and landscaping. The parking structure developed in Phase 2 of the proposed Project would rise to a maximum height of 81 feet and would be visible by the adjacent sensitive receptors to the east within the City of Torrance. However, the parking structure would include standard treatments to avoid light spillover, including: 1) solid parapet walls at least 42 inches high at each garage level and ramps; 2) planted screening at lower floor levels; and 3) screening at openings for upper levels.

Lighting within the City of Torrance right-of-way would also comply with TMC Section 92.30.5, which limits the intensity and impacts of night lighting and requires lighting be directed away from all surrounding residential land uses. Compliance with the Redondo Beach Design Guidelines and the TMC would ensure the new light sources associated with the proposed Project would not substantially affect off-site light-sensitive receptors surrounding the Project site..

Comment PF-19

The comment states that Impact VIS-4 should include additional analysis to consider the potential Project impacts on surrounding property, specifically to existing and future solar collectors atop single-family residences located in the residential neighborhood to the east. Section 3.1.1, *Environmental Setting* of the EIR has been revised to more specifically describe the existing solar collectors atop single-family residences located in the neighborhood to the east of the Project site. However, these residences are already included in the list of shade-sensitive receptors considered in Impact VIS-4. As described in Impact VIS-4 shadow-sensitive land uses adjacent to the Project site consist of residential buildings, including windows and private yards at most houses, Towers Elementary School to the east, and Dominguez Park to the northeast. The vast majority of the residences in the Torrance neighborhood east of the Project site would not be shaded until the evening hours (i.e., 5:00 p.m. during the Fall Equinox and 4:00 p.m. during the Winter Solstice) (refer to Figure 3.1-3 and Figure 3.1-5). Further, many of these residences are already shaded by the Beach Cities Health Center during the evening hours under existing conditions (refer to Figure 3.1-2) given the difference in elevation between the campus and the residences within the City of Torrance below. Shadow-sensitive uses, including the existing residences and associated rooftop solar collectors, to the east of the Project site would not be shaded by the proposed structures for

more than 3 hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than 4 hours between 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October); therefore, shade and shadow effects would be less than significant.

Comment PF-20

The comment describes the threat of urban coyotes in the region and recommends considering California native plant species and drought-tolerant planting in an exposed planting plan to avoid attracting habitat for urban coyotes. As described in Section 3.1, *Aesthetics and Visual Resources*, the proposed Project would landscape the Project site with a mix of drought-resistant grasses, shrubs, indigenous ground cover, and native shade trees consistent with the existing landscaping on-site and in the vicinity (refer to Figure 2-9). Further, as described in Section 1.5, *Required Approvals*, the landscape plan for the proposed Project would require approval from the Torrance Community Development Department pursuant to TMC Section 92.30.6. BCHD is committed to working collaboratively with the City of Torrance to develop a landscape plan that is suitable for approval.

Comment PF-21

The comment incorrectly claims that the EIR neglects to identify and analyze the slope and series of retaining walls along the eastern border of the Project site. Existing geologic and soils hazards at the Project site, including but not limited to liquification, landslides, slope instability, subsidence, and differential settlement, were thoroughly assessed based on the Geotechnical Report prepared by Converse Consultants (2016) and other sources of publicly available information including the Redondo Beach General Plan Environmental Hazards/Natural Hazards Element (1993), Torrance General Plan Safety Element (2010), Southern California Earthquake Data Center, California Department of Conservation, and California Emergency Management Agency (Cal EMA). Section 3.6, *Geology and Soils* specifically describes under Impact GEO-1:

> *"…according to the CGS Seismic Hazard Maps for Earthquake-Induced Landslides the Project site is not located in a designated landslide zone (CGS 2019a). Similarly, according to the Redondo Beach Local Hazard Mitigation Plan Earthquake-Induced Landslide Zones Map the Project site is not located in an area at risk for landslides (City of Redondo Beach 2019). Further, the Geotechnical Report prepared for the proposed Project determined that the Project site is underlain by dense alluvial deposits on an older terrace slope. No evidence of landslides was observed on descending hillside slopes below the Project site and the potential for seismically induced landslides is considered by very*

low (Converse Consultants 2016). Therefore, required compliance with the CBC would ensure that potential impacts associated with landslides would be less than significant."

Comment PF-22

The comment requests coordination with the TFD and TPD to prepare an Emergency Response Plan for emergency access on Flagler Lane. Impact HAZ-5 in Section 3.8, *Hazards and Hazardous Materials* of the EIR has been revised to clarify that BCHD would coordinate with the TFD and TPD to prepare an Emergency Response Plan for elements of the proposed Project within the jurisdiction of the City of Torrance.

Comment PF-23

The comment states that Impact LU-1 is not consistent with the Torrance General Plan and conflicts with the TMC. The goes on to claim that the EIR errors in stating the analysis of potential conflicts with the Torrance General Plan are limited to the proposed development within the City of Torrance right-of-way, and that the EIR should consider the entirety of the proposed Project for potential conflicts with the Torrance General Plan. Activities occurring within the City of Torrance right-of-way along Flagler Lane and Flagler Alley including curb cuts, grading, construction of retaining walls, and landscaping within the right-of-way, which are relatively minor components of the proposed Project, would require permits issued by the City of Torrance. However, the City of Torrance's jurisdictional over land use boundary includes only the very periphery of the Project site and does not extend further into the campus beyond the municipal boundaries. The potential for significant environmental effects resulting from conflict of the proposed Project with the Torrance General Plan are thoroughly addressed in Table 3.10-5. The final determination of consistency with individual policies will be the responsibility of the City of Torrance during consideration of discretionary and/or ministerial approvals, grading permits, and building permits for the proposed activities occurring within the City of Torrance right-of-way. Nevertheless, as required under CEQA, the EIR discloses and discusses potential consistency with such policies for consideration by City decision-makers and staff.

Comment PF-24

The comment states that the Draft EIR must include TMC Sections 92.30.2 and 92.30.3 to address the potential impacts on surrounding property, specifically the residential neighborhood to the east. Refer to the response to Comment PF-23. As described therein, the City of Torrance's jurisdictional over land use boundary includes only the very periphery of the Project site and does not extend further into the campus beyond the municipal boundaries.

Comment PF-25

The comment asserts that the EIR must include is subject to TMC Section 92.13.12(d), which states that no fence, wall, or hedge shall exceed 8 feet and 5 feet in height, respectively. Refer to the response to Comment PF-8.

Comment PF-26

The comment incorrectly claims the EIR understates the conflict with access to Flagler Lane and does not consider other Project alternatives that do not access Flagler Lane. However, 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. Refer to the response to Comment PF-3.

Comment PF-27

The comment requests specification in MM NOI-1 that construction is prohibited on Sundays and Holidays observed by Torrance City Hall pursuant to TMC Section 6-46.3.1, and that the arrival times of workers, construction vehicles and materials should adhere to the allowable hours as specified. MM NOI-1 does specify that *"[c]onstruction activities shall be restricted to the hours between 7:30 a.m. and 6:00 p.m., Monday through Friday, or the hours between 9:00 a.m. and 5:00 p.m. on Saturday to the maximum extent feasible, in accordance with RBMC Sections 4-24.503 and 9-1.12 and TMC Section 6-46.3.1."* MM NOI-1 also notes that the Construction Noise Management Plan would require approval by the Torrance Building & Safety Division, in accordance with TMC Section 46.3.1, for construction activities occurring with the City's jurisdictional limits. BCHD is committed to working collaboratively with the City of Torrance to develop a Construction Noise Management Plan that is suitable for approval.

The comment also requests identification in MM NOI-1 of which agency will enforce construction noise violations and respond to noise complaints. The CEQA Guidelines provide that *"until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the [MMRP]."* A MMRP has been provided in Section 11.0, *Mitigation, Monitoring, and Reporting Program* and implementation responsibilities, monitoring, and reporting actions are identified it Table 11-1. As described in MM NOI-1, *"BCHD shall monitor noise and vibration resulting from construction activities to ensure that all noise attenuation measures are implemented as described in the Plan. Further, BCHD shall provide a non-automated telephone number for residents and employees to*

call to submit complaints associated with construction noise. BCHD shall keep a log of complaints and shall address complaints as feasible to minimize noise issues for neighbors. The Redondo Beach and Torrance Building & Safety Divisions shall require modification to the conditions of the Construction Noise Plan, if necessary, to address non-performance issues."

The comment also recommends consideration of additional methods to mitigate significant and unavoidable construction noise impacts, such as repositioning the RCFE Building further west with each floor stepping back farther from Flagler Lane as building height increases. Refer to the response to Comment PF-3.

Comment PF-28

The comment states that the proposed construction haul routes for the proposed Project are not consistent with the consistent with the Torrance General Plan Circulation & Infrastructure Element Figure CI-3 Truck Routes and Rail Lines, specifically the portion of Del Amo Boulevard between Madrona Avenue and Hawthorne Boulevard. Refer to the response to Comment PF-10.

Comment PF-29

The comment states that pursuant to TMC Section 46.7.2(c) residential and commercial noise limits are adjusted during certain noise conditions. The comment recommends that the EIR consider these noise limit adjustments to identify potential operational noise impacts. The comment also recommends considering additional methods for mitigation of operational noise levels from outdoor events, such as restricting amplified noise at outdoor events to between 7:00 a.m. to 7:00 p.m. Sunday through Thursday and 7:00 a.m. to 10:00 p.m. on Friday and Saturday, and limiting the number of outdoor events altogether. The EIR acknowledges that BCHD would be responsible for compliance with the applicable local noise ordinances. MM NOI-3b specifically states, *"[t]he Plan shall also detail the hours of outdoor classes/events, maximum class/event capacities, and allowable noise levels consistent with the RBMC and TMC."* Additionally, MM NOI-3c would require the proposed Aquatics Center to *"close operations by 10:00 p.m. to comply with RBMC and TMC lower nighttime noise level criteria."* The complete elimination of outdoor activities at the campus is neither warranted nor required to comply with the applicable local noise ordinances.

The comment recommends considering methods to reduce operational noise impacts such as repositioning the RCFE Building further west with each floor stepping back farther from Flagler Lane as building height increases. As described in Section 3.11, *Noise*, operational noise associated with the proposed Project would primarily be related to heating, ventilation, and air conditioning (HVAC) equipment, the proposed electrical yard, delivery and service trucks, emergency vehicles,

parking operations in the proposed parking lot and parking garage, roadway noise, and the proposed outdoor function areas. Noise from the delivery and service trucks and the proposed outdoor function areas are the only sources of operational noise considered to have the potential to result in significant noise impacts at sensitive receptors. Implementation of MM NOI-3a (Delivery Truck Hours and Idling) and MM NOI-3b (Events Management Plan) would reduce noise levels resulting from operation of the proposed Project. Additionally, MM NOI-3c (Outdoor Pool Activities) would require the Aquatics Center, specifically the outdoor pool and deck area would close operations by 10:00 p.m. to comply with RBMC and TMC lower nighttime noise level criteria. As such, the required mitigation measures in Section 3.11, *Noise* sufficiently mitigate operational noise to less than significant levels and additional measures are not needed to mitigate operational noise levels from the RCFE Building.

Comment PF-31

The comment recommends considering methods to reduce operational noise impacts from the proposed parking structure, such as covering driving surfaces with materials that reduce noise from tires and lining the parking structure exterior with screening materials (e.g., screen wall with planters). As described in Section 3.11, *Noise*, due to the relatively high level of traffic noise along streets in the vicinity of the Project site, normal daytime parking garage L_{eq} noise of 56 dBA would likely be imperceptible. Therefore, noise impacts relating to parking operations would result in less than significant operational noise impacts. Additionally, as previously described, the perimeter of the campus would be planted with a mix of grasses, shrubs, ground cover, and shade trees to provide landscape screening. This proposed Project landscaping would further reduce noise levels associated with the operation of the proposed parking garage. Additional measures are not needed to mitigate operational noise levels from the RCFE Building.

Comment PF-32

The comment requests elimination of the proposed driveways on Flagler Lane and revision of the entire EIR and appendices to implement this change. However, the EIR notes in Section 3.10, *Land Use and Planning* and Section 5.0, *Alternatives* that 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.

The comment also requests clearly stating that the City's trial implementation of a one-way traffic restriction on Flagler Lane is not related to the proposed development and is not a mitigation for any cut-through traffic that the proposed development will introduce. However, it is clearly stated in the environmental setting of Section 3.14, *Transportation* that existing cut-through traffic between Beryl Street and Del Amo Boulevard associated with commuting as well as student pick-up and drop-off at Towers Elementary School is a safety concern and that the City of Torrance is currently planning to pilot a temporary one-way partial closure of southbound traffic on Flagler Lane between Towers Street and Beryl Street to reduce existing cut-through traffic and associated safety risks between Beryl Street and Del Amo Boulevard. The EIR does not imply that this pilot is in any way connected to the proposed Project. Further, the EIR does not imply that this pilot planned by the City of Torrance is a mitigation for cut-through traffic associated with the proposed Project. As described in Section 3.14, *Transportation*, the proposed one-way driveway, which would be accessible via a right-turn along eastbound Beryl Street, would provide a left-turn-only exit onto northbound Flagler Lane, immediately south of Beryl Street. Similarly, service vehicles would enter the proposed service area and loading dock by taking a right off of Flagler Lane and exit taking a left turn onto northbound Flagler Lane. Unlike the entrances from North Prospect Avenue, the driveways along Flagler Lane would not provide access to long-term parking on the campus and as such, would not be a primary entrance. Therefore, operation of the proposed driveways along Flagler Lane would not contribute to cut-through traffic within the Pacific South Bay residential neighborhood. Further, as described in Table 3.14-7, while operation of Phase 2 of the proposed Project is expected to generate an incremental increase of 376 net new daily vehicle trips, AM peak period trips would be reduced by approximately 37 and PM peak period trips are expected to be reduced by approximately 28, as compared to existing BCHD trip generation. Given that buildout of the proposed Project would reduce existing AM and PM peak period trip generation, the proposed Project would slightly reduce overall congestion on major roadways in the area during busy commute times. The reduction in overall congestion would allow for more efficient movement of traffic and less incentive for drivers to cut-through residential neighborhoods. Therefore, the proposed Project would not contribute to operational safety hazards related to cut-through traffic and does not require mitigation for cut-through traffic.

Additionally, the cumulative impacts discussion in Section 3.14, *Transportation* notes that if the City of Torrance's temporary one-way closure of southbound traffic on Flagler Lane is successful and neighborhood residents support it, the one-way closure could become permanent. This would preclude access for service and delivery vehicles to the subterranean proposed service area and loading dock beneath the proposed RCFE Building. For this reason, an alternative to the proposed

Project with a revised access and circulation scheme is considered under Alternatives 3, 4, 5, and 6 in Section 5.0, *Alternatives*.

Comment PF-33

The comment requests that the EIR emphasize that the BCHD Bike Path Project is independent of the proposed Project, and is already funded through a Measure M Metro Sustainability Implementation Plan Grant, and will be implemented regardless of the proposed Healthy Living Campus Master Plan provided that all necessary environmental clearances and approvals are secured from the cities of Redondo Beach and Torrance. As described in the cumulative impacts discussion of Section 3.14, *Transportation*, *"BCHD is coordinating the BCHD Bike Path Project (separate from the proposed Project) with the City of Redondo Beach and the City of Torrance to develop a formal protected Class I bicycle path along Flagler Lane east of the Project site to connect the existing Class II bicycle lanes on Diamond Street and Beryl Street."* This discussion has been revised to clarify the grant funding source to further substantiate that these are two separate and distinct projects.

Comment PF-34

The comment states that the construction haul routes for the proposed Project are not consistent with the consistent with the Torrance General Plan Circulation & Infrastructure Element Figure CI-3 Truck Routes and Rail Lines, specifically the portion of Del Amo Boulevard between Madrona Avenue and Hawthorne Boulevard. Refer to the response to Comment PF-10.

Comment PF-35

The comment requests elimination of the proposed driveways on Flagler Lane and revision of the trip distribution to implement this change. As previously noted in response to Comment PF-32, the EIR notes in Section 3.10, *Land Use and Planning* and Section 5.0, *Alternatives* that 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 Project 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. For further detail on Project Alternatives, see Section 5.0, *Alternatives*.

Comment PF-36

The comment requests that the thresholds in the Non-CEQA Intersection Operational Evaluation (see Appendix J) be consistent with those provided by the City of Torrance in its July 29, 2019 comment letter. These thresholds have been reviewed for consistency with the July 29, 2019 comment letter and updated, where necessary.

Comment PF-37

The comment requests providing additional information that Flagler Lane south of Beryl Street is a local street. The EIR does note the designation of Flagler Lane south of Beryl Street as a local street in Section 3.14.1, *Environmental Setting*. The description of Flagler Lane has been revised to further clarify that Flagler Lane is considered a local street between Towers Street and Beryl Street.

Comment PF-38

The comment states that coordination with the TFD and TPD is required to prepare an Emergency Response Plan. Refer to the response to Comment PF-9.

Comment PF-39

The comment requests clearly stating that the City's trial implementation of a one-way traffic restriction on Flagler Lane is not related to the proposed development and is not a mitigation for any cut-through traffic that the proposed development will introduce. Refer to the response to Comment PF-32.

Comment PF-40

The comment recommends consideration of repositioning the RCFE Building further west with each floor stepping back farther from Flagler Lane as building height increases to maintain an existing view corridor from the intersection of 190th Street and Flagler Lane. Refer to the response to Comment PF-3.

Comment PF-41

The comment requests visual aids/exhibits for Alternative 6 to demonstrate the reduced height and again recommends consideration of repositioning the proposed RCFE Building further west with each floor stepping back farther from Flagler Lane as building height increases to maintain an existing view corridor from the intersection of 190th Street & Flagler Lane. An exhibit of Alternative 6 is provided in Figure 5-2; however, as described for MM VIS-1, a detailed design

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*.

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 stat 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