



Sunrise Senior Living Manhattan Beach Project

Final Environmental Impact Report/ Responses to Comments on the Draft EIR

SCH#2021040438

prepared by

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July 2021



RINCON CONSULTANTS, INC.

Environmental Scientists | Planners | Engineers

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Revised Appendix F	Revised Roadway Construction Noise Model (RCNM) Calculations
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1 Introduction

1.1 Purpose of the Response to Comments on the Draft EIR

This document contains responses to comments received on the Draft Environmental Impact Report (EIR) prepared for the proposed Sunrise Senior Living Manhattan Beach Project (project). The Draft EIR identifies the likely environmental consequences associated with development of the proposed project and recommends mitigation measures to reduce potentially significant impacts. This document, together with the Draft EIR, constitutes the Final EIR for the proposed project.

1.2 Environmental Review Process

Pursuant to the California Environmental Quality Act (CEQA), lead agencies are required to consult with public agencies having jurisdiction over a proposed project and to provide the general public with an opportunity to comment on the Draft EIR.

On November 21, 2018, the City of Manhattan Beach circulated a Notice of Preparation (NOP) for a 30-day comment period to help identify the types of impacts that could result from the proposed project, as well as potential areas of controversy. The City held an EIR Scoping Meeting on December 5, 2018. The meeting was aimed at providing information about the proposed project to members of public agencies, interested stakeholders and residents/community members.

The Draft EIR was made available for public review for a 45-day comment period that began on April 19, 2021 and ended on June 4, 2021. The Notice of Availability of a Draft EIR was posted with the County Clerk, sent to the State Clearinghouse, published on the City website, posted on a large notice board at the project site, mailed to owners and occupants within 500 feet of the project site, mailed to responsible agencies, and published in the local newspaper (Beach Reporter).

The City received eight comment letters on the Draft EIR. Copies of written comments received during the comment period are included in Chapter 2 of this document.

1.3 Document Organization

This document consists of the following chapters:

- **Chapter 1: Introduction.** This chapter discusses the purpose and organization of this response to comments Document and the Final EIR and summarizes the environmental review process for the project.
- **Chapter 2: Written Comments and Responses.** This chapter contains reproductions of all comment letters received on the Draft EIR. A written response for each CEQA-related written comment received during the public review period is provided. Each response is keyed to the corresponding comment.
- **Chapter 3: Revisions to the Draft EIR.** Changes to the Draft EIR that have been made in light of the comments received are contained in this chapter.

2 Comments and Responses

This chapter includes written comments received during the circulation of the Draft EIR prepared for the Sunrise Senior Living Manhattan Beach Project, and responses to those comments.

The Draft EIR was circulated for a 45-day public review period that began on April 19, 2021 and ended on June 4, 2021. The City of Manhattan Beach received eight comment letters on the Draft EIR. The commenters and the page number on which each commenter's letter appear are listed below.

Letter No. and Commenter	Page No.
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The comment letters and responses follow. The comment letters have been numbered sequentially and each separate issue raised by the commenter, if more than one, has been assigned a number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue (Response 1.1, for example, indicates that the response is for the first issue raised in comment Letter 1).

During the Draft EIR review period, the City solicited written public and agency comments on the Draft EIR pursuant to CEQA.

In some cases, specific changes to the text of the Draft EIR have been made in response to comments received. In no case do these revisions result in a greater number of impacts or impacts of a substantially greater severity than those set forth in the Draft EIR. Where revisions to the main text are called for, the page and paragraph are set forth, followed by the appropriate revision. Added text is indicated with underlined and deleted text is indicated with ~~strikeout~~. Page numbers correspond to the page numbers of the Draft EIR.

Letter 1

From: Mark Nelson (Home Gmail) <menelson@gmail.com>

Sent: Thursday, April 22, 2021 5:04 PM

To: Angelica Ochoa <aocchoa@citymb.info>

Cc: City Clerk <cityclerk@citymb.info>

Subject: [EXTERNAL] DEIR Comments and Public Comments to the Mayor and Council of Manhattan Beach

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Dear Mayor and Council, as well as, Planning Department:

The City of Manhattan Beach errs in its assertion that intermittent noise is not significant and a health hazard.

Specifically, the City asserts:

Noise

Impact N-1. Project construction would expose nearby receivers to a temporary increase in noise. However, noise levels during construction would be limited to the daytime pursuant to the City's Municipal Code, and construction noise levels would be temporary and intermittent. Impacts would be less than significant.

None required Less than significant without mitigation

Impact N-2. Project operation would expose nearby receivers to a permanent increase in noise. However, noise levels during operation would be similar to those of the adjacent single-family residences, and parking lot and mechanical equipment noise would be shielded by its placement in the subterranean structure. Impacts would be less than significant.

None required Less than significant without mitigation

Research Shows Construction Will Cause Cardiovascular Disease, Diabetes and Stroke from Construction Noise - Construction will cause significant noise impacts during the day on surrounding residents, however, the City is asserting that daytime, intermittent noise is essentially exempt. Noise from traffic and construction is known to cause stress, and over the period of construction it is likely to cause chronic stress. The City of Manhattan Beach is a co-owner of BCHD. BCHD spent multi-million dollars of taxpayer funds to buy and implement the Blue Zones program. The Blue Zones program calls chronic stress the "silent killer." From the peer-reviewed literature, epidemiological studies have provided evidence that traffic noise exposure is linked to cardiovascular diseases such as arterial hypertension, myocardial infarction,

Letter 1

and stroke. Persistent chronic noise exposure increases the risk of cardiometabolic diseases, including arterial hypertension, coronary artery disease, diabetes mellitus type 2, and stroke. (see peer reviewed studies such as: <https://www.ncbi.nlm.nih.gov/pubmed/30937979>, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5898791/>, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7952109/>) Construction it will have significant negative impacts on the surrounding homes and businesses. Research demonstrates the impacts include cardiovascular disease, diabetes, and stroke and in this case, the construction will be the direct cause of the damage to community members.

Intermittent Noise and Vibration from Any Source will Harm Home School Students Learning and Health – The assumed noise level is 85 dB from heavy trucks per the US government and OSHA estimates. That intermittent sound will break the concentration of students, leading to learning delays and exacerbating any ADA-protected learning disabilities. (see peer reviewed studies such as: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3757288/>, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6018141/>, <https://doi.org/10.3389/fpsyg.2013.00578>, <https://www.frontiersin.org/articles/10.3389/fpsyg.2013.00578/full>) Put simply, the City ignores the significant negative impacts on students by using the fallacy that “daytime” and “intermittent” noise is de facto not significant. That is clearly not true, and nor will intermittent loud trucks have no impact on the children and their learning. In this case, construction will be the direct cause of educational damage to both neurotypical and ADA-protected students with learning disabilities.

Sustained 85dB noise is an OSHA workplace violation. Educational literature finds that intermittent noise at the level is a hazard for learning and development.

Unequivocally, “Exposure to noise constitutes a health risk. There is sufficient scientific evidence that noise exposure can induce hearing impairment, hypertension and ischemic heart disease, annoyance, sleep disturbance, and decreased school performance. For other effects such as changes in the immune system and birth defects, the evidence is limited. Most public health impacts of noise were already identified in the 1960s and noise abatement is less of a scientific but primarily a policy problem.” The evidence is well established. see typical peer-reviewed study results, such as Noise Exposure and Public Health, <https://ehp.niehs.nih.gov/doi/pdf/10.1289/ehp.00108s1123> or <https://www.sciencedaily.com/releases/2018/11/181105081749.htm>)

In short, the DEIR clearly errs in its determination that noise is not significant by relying on faulty assumptions and failing to use the findings of BCHDs (an agency founded, funded and owned by Manhattan Beach) Blue Zones and also the peer-reviewed literature.

Mark Nelson

Letter 1

COMMENTER: Mark Nelson

DATE: April 22, 2021

Response

The commenter asserts that exposure to noise constitutes a health risk, including that construction noise causes - cardiovascular disease, diabetes, and stroke; traffic noise causes chronic stress, and cites findings from the Beach Cities Health District regarding chronic noise and stress. The commenter states that the City exempts intermittent daytime construction noise. The commenter asserts that noise and vibration will harm homeschooled students, and a sustained 85 dB noise is an Occupational Safety and Health Administration (OSHA) workplace violation. The commenter expresses the opinion that the Draft EIR incorrectly concluded that noise impacts would be less than significant.

Please refer to Impact N-1 in Section 4.6, *Noise*, of the Draft EIR. As stated therein, temporary construction noise would last approximately 20 months, and the maximum hourly noise level, as calculated in RCNM, was 78 dBA L_{eq} at 75 feet. The existing wall along the eastern project site boundary would further reduce this maximum noise level to 72 dBA L_{eq} at the nearest residential receiver. This does not exceed the established FTA threshold of 80 dBA L_{eq} ; therefore, impacts were determined to be less than significant. It should also be noted that typical exterior to interior noise reductions at modern buildings is 20 to 25 dBA (FTA 2018); therefore, the maximum level of construction noise at nearby sensitive receivers would be further reduced to 52 dBA L_{eq} , as experienced from the interior of buildings.

The commenter expresses concern with noise 85 dB or greater, which is greater than the calculated maximum hourly construction noise level. Additionally, the commenter does not provide a distance at which construction equipment would generate 85 dB of noise. However, construction contractors would be required to comply with California Occupational Safety and Health Administration regulations related to worker exposure to noise. Section 5096 of these regulations sets duration-based noise exposure limits for construction workers that require provision of personal protective equipment should exposure exceed the specified limits. These regulations would reduce construction worker exposure to high noise levels such that construction activities would not expose employees to excessive noise levels.

It should also be noted that “chronic noise” is defined as noise that occurs over a long period of time, which aligns with the definition of operational noise in the context of the proposed project. Impact N-2, beginning on page 4.6-14 of the Draft EIR, and Impact N-3 on page 4.6-16 of the Draft EIR, describe the operational noise impacts of the proposed project, which were determined to be within established noise thresholds for the City. Refer to pages 4.6-12 and 4.6-13 of the Draft EIR for the operational noise thresholds used in the operational noise analysis. Therefore, the project would not result in significant “chronic noise” impacts, as suggested by the commenter.

Letter 2

From: David Wong <dfwg@msn.com>
Sent: Saturday, May 1, 2021 5:47 PM
To: Angelica Ochoa <aocchoa@citymb.info>
Subject: [EXTERNAL] Sunrise Senior Assisted Living Project

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Dear Ms. Ochoa,

I'd like to advise you of the key concern that my neighbors and I living on 5th Street have regarding the proposed Sunrise Senior Assisted Living Project. The current Sunrise design is to have all cars, trucks and other vehicles enter and exit the facility garage from a single access point located mid-block on 5th Street instead of anywhere on Sepulveda Boulevard. We strongly protest this terrible traffic intrusion on our residential street. Traffic congestion from vehicles entering 5th Street from Sepulveda and vehicles entering Sepulveda from 5th Street would be a nightmare.

In addition, the impact to 5th Street residents would be significant as a result of the heavy volume of traffic necessary to operate a small "city" like a Sunrise facility; which would include vehicle traffic from site workers; residents, their families, friends and visitors; major cafeteria food operations; inhouse medical and emergency services; commercial UPS, FedEx, Amazon deliveries; facility maintenance vehicles; Sunrise facility vans and buses; garbage and medical waste disposal; and all other site traffic.

The simple traffic design solution would be having direct facility access for all vehicles from Sepulveda Boulevard, similar to the two nearby hotels on the boulevard. Possibly having vehicle access located at the extreme north or south ends of the property on Sepulveda could be considered.

As stated in the Sepulveda Boulevard Development Guide regarding Residential Nuisance; "Extreme noise and odor generating activities near residential boundaries should be avoided".

Thank you for your consideration of this matter.

Sincerely,

David F Wong
1131 5th Street
Manhattan Beach, CA 90266
dfwg@msn.com
(310) 376-0175

Letter 2

COMMENTER: David F Wong

DATE: May 1, 2021

Response

The commenter states that all traffic would enter the project site from 5th Street, with no entrance on Sepulveda Boulevard. The commenter expresses the opinion that this would cause traffic congestion and be an intrusion onto a residential street. The commenter expresses concern about the number of trips from site workers, residents, visitors, cafeteria operations, medical and emergency services, commercial deliveries, maintenance vehicles, vans and buses, and garbage disposal. The commenter suggests all traffic enter the site from Sepulveda Boulevard. The commenter also states that the Sepulveda Boulevard Development Guide addresses noise and odor nuisance near residential boundaries.

Section 2.5.2 of the Draft EIR describes the project site access as follows:

The main vehicular access to the subterranean parking garage would be provided on Sepulveda Boulevard with a separate service access (trash and deliveries) on 5th Street. The auto court access off Sepulveda Boulevard would allow for the pick-up and drop-off of residents and visitors.

Therefore, the commenter's assertion that all vehicles would access the site from 5th Street is incorrect, as only trash and delivery vehicles would use the proposed 5th Street entrance to the site. This is further demonstrated on Figure 2-6 of the Draft EIR, where it is shown that the garage entrance from 5th Street does not provide access to the garage parking level, but only to the two commercial loading spaces within the site.

Additionally, as described on page 4.2-13 of the Draft EIR, no more than 10 delivery trips would occur each day; therefore, the project would not expose sensitive receptors to substantial concentrations of diesel particulate matter. Additionally, as described under Impact N-3 on page 4.6-16 of the Draft EIR, vehicle trips on 5th Street (from deliveries and trash collection) would not increase traffic noise at receptors located along 5th Street.

Also, regarding odor impacts, as stated in Section 4.2.2 of the Draft EIR, the proposed land uses are not identified by the California Air Resources Board as land uses associated with odor complaints. Therefore, the proposed project would not generate objectionable odors affecting a substantial number of people, and no odor impacts would occur.

Letter 3

From: Jim McGory <jmcgory@mapmarketinginc.com>
Sent: Monday, May 3, 2021 1:04 PM
To: Angelica Ochoa <aocchoa@citymb.info>
Subject: [EXTERNAL] Sunrise Assisted Living Facility

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Hi Angelica:

I received notice about the Sunrise Development. I have owned 3 homes in MB since 1997, and bought this one in 2003 and raised our kids here. We are at 1136 5th Street which has a very large hill coming east off of Sepulveda. We constantly deal with people darting down and up this street and often at excessive speed. If this facility gets built we are only going to have more traffic both ways with delivery's and construction. Currently where Lucifer's Pizza is and Globe Tire just on the north side of 5th Street there is always huge congestion where I have seen 50+ close calls with accidents. It's a tiny entrance and exit with a steep hill and Globe Tire employees parking cars on the north side of the street and it's basically driving an obstacle course.

I also understand there will be no entrance to the proposed Sunrise facility from Sepulveda which is unacceptable. Delivery's and visitors will have to turn on 5th or 2nd street (u turn)? It's already scary on our street and it would get substantially worse. Already the first house East of Sepulveda on 5th Street has already put their house up for sale. This is going to be a nightmare and it's not the right fit for that space.

Thank you for listening.

Jim McGory

President | MAP Meetings & Incentives
1136 5th Street Manhattan Beach, CA 90266 | www.mapmarketinginc.com
C: (310) 995-8000 | O: (310) 481-7992 | F: (310) 693-2530

Please note that my email address is jmcgory@mapmarketinginc.com



Letter 3

COMMENTER: Jim McGory, President of MAP Meetings & Incentives

DATE: May 3, 2021

Response

The commenter states that existing traffic on 5th Street travels at excessive speeds from Sepulveda Boulevard. The commenter states that the project would increase traffic and noise on 5th Street from delivery and construction vehicle trips. The commenter states that the project would not provide a site entrance from Sepulveda Boulevard, and delivery vehicles would need use 5th Street or 2nd Street to access the site, which would worsen existing traffic issues in the neighborhood.

Please refer to Response to Letter 2, above, regarding the proposed site access. As described therein, the majority of project-related trips would access the site from Sepulveda Boulevard, with only trash and delivery trips accessing the site from 5th Street.

As described under Impact T-1 of the Draft EIR, beginning on page 4.7-10, construction vehicle trips would replace existing operational trips, and would be substantially fewer than existing operational trips to the project site. Additionally, as described on page 4.2-13 of the Draft EIR, no more than 10 delivery trips would occur each day; and as described under Impact N-3 on page 4.6-16 of the Draft EIR, vehicle trips on 5th Street (from deliveries and trash collection) would not increase traffic noise at receptors located along 5th Street. As shown on Figure 7-1 of Appendix C to the Draft EIR, only **five** percent of project trips would occur on 5th Street, and these trips on 5th Street to the project site would not travel past the project site boundary into the neighborhood located west of the site.

The commenter's assertion that vehicle trips would access the site from 2nd Street is incorrect, as 2nd Street does not border the project site (please refer to Figure 2-2 in the Draft EIR). As shown on Figure 7-1 of Appendix C to the Draft EIR, only five percent of project trips would occur on 2nd Street during the PM peak hour.

Letter 4

From: cynthia palm <galcapale11@gmail.com>
Sent: Tuesday, May 25, 2021 10:01 AM
To: Angelica Ochoa <aocchoa@citymb.info>
Subject: Re: [EXTERNAL] Sunrise Development Project

Hi. I guess they are related to the overall project, so let me highlight the comments that relate to the EIR only Here and I will forward the rest of my email (or save it) for the planning commission.

Below are my concerns about the EIR

4.1

1) I can tell you that noise is reflected off large buildings adjacent to Sepulveda and on Sepulveda into the surrounding neighborhoods. How do I know this when I am not an engineer? Because I live near Mira Costa and the new GYM that has been erected bounces noise into the neighborhood. Some is good - like I can hear the waves crashing sometimes believe it or not and other noise, is terrible - like the constant DRONE of traffic on Sepulveda. I wonder, do you do noise studies related to this? Is it a unique phenomenon or this common? I believe this is worthy of study.

4.2

2) I am also concerned about the height variance requested. While I was a volunteer member on the Sepulveda Project, I was (and still am) a proponent of the height variance. However, in my mind, these variances make sense only in the "Valley" areas of the boulevard, not on the "Peak" areas of the boulevard. Goat Hill is a HIGH position anyway on the boulevard and a height variance in this location will look monstrous and out of place. The Height and Breadth of this building will dwarf the surrounding landscape.

3) The neighborhood directly to the east of Goat Hill is located in a VALLEY. I am speaking of the first block. This height variance will DWARF the family homes on that block, definitely impact those families in a negative way from both a lifestyle standpoint and also from a property value standpoint.

4.3

4) Traffic will be a problem. With a light at 2nd street that already takes FOREVER to allow traffic flow, I imagine visitors and vendors using 2nd street off of Aviation to travel to Sepulveda to allow a right turn into traffic to avoid the back up of the light on the south side at 2nd street. This traffic flow will impede school safety, traffic safety and create a traffic jam that will be untenable to the surrounding neighborhood between PECK and Sepulveda on 2nd street.

4.4

5) Toxic waste is a reality in these types of facilities. There are human waste issues (adult diapers) and medications requiring special refuse treatment upon disposal. Do we really want to bring in a more toxic industry into our community?

4.5

6) Natural Light and Air to the neighborhood to the east will be BLOCKED by this development. In a time of appreciation for our natural world, is this how we envision the Manhattan Beach of the future? You don't allow residents to have an 8 foot fence in their front yard, but you will allow this type of building on a major thoroughfare?

4.6

7) I am going to say it again, we do not need this facility in our city. We have two others within easy driving access. I can attest to the fact that there is generally availability for new residents as

Letter 4

4.6
(cont.)

turn over is HIGH. Let's find a better community oriented solution for this site that serves all our residents.

On Mon, May 24, 2021 at 9:17 AM Angelica Ochoa <aochoa@citymb.info> wrote:

Hi Cynthia,

Thank you for your comments. I just wanted to get clarification on the nature of your comments. Is this comment a response to the draft EIR out for public review or would you like this to be considered as a public comment for the Planning Commission when it is scheduled for public hearing? Some of your comments are related to the EIR but the majority are related to the overall project. There will be a second notice that will be mailed out for the Planning Commission public hearing.

Thank you.

Please call me if you want to discuss further.

Angelica Ochoa

(310) 802-5517

From: cynthia palm <galcapale11@gmail.com>
Sent: Friday, May 21, 2021 10:50 AM
To: Angelica Ochoa <aochoa@citymb.info>
Subject: [EXTERNAL] Sunrise Development Project

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

4.7

Good Morning Angelica.

The purpose of this email is to convey my concerns and thoughts regarding the proposed project at Goat Hill. In full disclosure, I am a tenant at Goat Hill. I know Stuart very well. Please understand, I am not writing this because I hope GOAT Hill stays what it is. I am okay with it being developed - but I am 100% against a Sunrise Facility. It should also be known, I am in this industry. I am intimately familiar with Sunrise, the senior community and the aging process. I have informed opinions based on 14 years of hands-on experience in this area.

I am a Licensed Professional Fiduciary under license 766 and a CPA under license 61719. I am a member of CalCPA and PFAC. Most importantly, I am a 60 year south bay resident and a 24 year homeowner resident of Manhattan Beach and a business owner here in Manhattan Beach.

Concerns:

Letter 4

1) I do not like the idea of an international company taking up our local opportunity to support small owned businesses. Revera Inc. is the majority shareholder of Sunrise. Revera is a Canadian senior Housing Firm. Sunrise is one of the largest senior living providers in the nation. Make no mistake, Sunrise is in the BUSINESS of our aging population. Senior care is secondary to turning a profit.

2) Sunrise has a facility in both Hermosa Beach and Playa Del Rey. These facilities are 1.1 miles - a 6 minute drive and 7.9 miles, a 20 minute drive respectively. These existing facilities can serve Manhattan Beach residents negating the need for another facility in our community.

3) This proposed Business, doesn't serve the residents with much needed services. It does not generate sales tax nor improve the daily existence of being a resident in this community. Respectfully, I work in this industry and can tell you that someone living in a facility such as this does not necessarily need to live in one in the community they are leaving. Depending on their abilities, they may or may not leave the facility to partake in community activities. Let's be perfectly honest here. These are NOT RETIREMENT communities. Most residents here are not ACTIVE SENIOR CITIZENS. They are no longer driving. They are often using supportive devices like wheelchairs and canes. They are often confused. They are often incontinent. They are seniors who need a level of care that can no longer be handled by their families. Yes, they provide "exercise class", "Movie nights", "Live music" etc. I strongly suggest you go unannounced to the facility in Hermosa or Playa and observe these activities and the related level of participation.

4) Given my experience in the senior population, I can confidently say, most seniors want to stay in their homes. If they need more care, they would still prefer to stay in their homes with caregivers. This is almost a universal response to this question. You should inquire with seniors in our community about this. I am confident you will hear this response. I also am confident, if you ask them, if you had to live in Hermosa should you ever NEED to move to a facility like this, would it be devastating? They will say, no. At the point they enter one of these facilities, they are "resigned" to the experience. However, they often don't give up and often ask to "go home". They often have to give up beloved pets and most of their life long possessions. They are moved into a room, maybe a small suite.

5) Based on my experience in this community, EVERY single Assisted Living Facility focuses on the beauty of the facilities, the activities provided, perhaps the "field trips". The honest to goodness truth is that what makes the experience the BEST in these facilities is the employees and the other residents. And, I can tell you that both experience a fairly high degree of turn over. The experience you may have when you first move in, may not be the experience 6 months later, due to changes in management and employees.

6) If the argument is going to be made that this will be a good option for our senior residents, please do your research on the industry. Turnover is high. Employee burnout is high. Many residents have dementia that are not in the "memory wing" and they do not fully engage in the activities provided, bringing down the experience for the overall population.

4.7
(cont.)

Letter 4

- 4.8 7) The size of this project is offensive as it abuts directly into the surrounding neighborhood. The blocking of sunlight to the neighborhood directly to the east.
- 8) The size of this project is offensive as it will block ocean breezes to the east.
- 4.9 9) We have other services that are needed in our community that the city should strongly consider:
- A) A hardware store
- B) An arts supply/craft supply store
- WHAT ELSE? We have too many pharmacy's. Do we really need multiple branches for Wells Fargo? Union Bank? Chase Bank?
- 4.10 10) We talk about affordable housing all the time in this city. Can't we make that happen here in some way? For example, loft style living on the top floor with needed community shops on the bottom floor? The top floor at this location as it stands now has wonderful views to the east. TIME for the city to get creative.
- 4.11 11) East Manhattan Beach feels like a second class citizen. Ignoring the "mall" - we are losing family owned, locally owned restaurants. Where is the "lifestyle" experience for the east side of our city? Sketchers is taking over Sepulveda. Now we are talking about a large hotel abutting the neighborhood at the Torasco site. And, this a large senior facility at Goat Hill. It feels very much like you are building a wall in the city and further dividing our community into EAST and WEST. Not smart civil planning.
- 4.12 12) Traffic increases in the local neighborhood is a huge issue. Second street and Fifth street would both need to be closed to through traffic. Otherwise, you will have traffic lines and cues trailing into the neighborhood as "visitors" and "vendors" to the facility cut through the neighborhood (at high rates of speed I might add) versus staying on Artesia and Sepulveda.
- This traffic will impede the safety of our students and their families as there are three schools less than a mile away. Pennekamp, Montesorri and Mira Costa.
- 4.13 13) Where on the east side, can small locally owned businesses get a toe hold in serving the community? The mall? The outdated and poorly designed retail area at Sepulveda/and Artesia? Where are our beautiful outdoor dining experiences supposed to happen? How are you working towards creating an EAST SIDE lifestyle that is equivalent to the west side?
- 4.14 14) Emergency service vehicles transporting clients is a large concern in terms of disrupting traffic flow on this stretch of road
- 4.15 15) Trash pick up. Linen service delivery. Food delivery will all involve LARGE DELIVERY trucks that are NOISY and impede easy traffic flow.

Letter 4

4.16 | 16) We know this stretch of Sepulveda is already a dangerous section. Accidents happen regularly on this stretch of road between 2nd and 8th. Speeding is common.

17) Parking. Parking for visitors. Parking for employees. How will this STAY OUT OF THE NEIGHBORHOOD

4.17 | I share all of the above for two reasons. First, to shatter any illusion you may have that this type of place is senior citizen nirvana. It definitely is not. Second, I believe we can provide something better to our community in terms of service and lifestyle. Lastly, I believe the city needs to work actively to ensure the east side of our community is not treated as a second class citizenry.

Thank you for your time in reading this.

Sincerely,

Cynthia Palm

Letter 4

COMMENTER: Cynthia Palm

DATE: May 21, 2021

Response 4.1

The commenter states that noise reflects off large buildings on and adjacent to Sepulveda Boulevard into surrounding neighborhoods, amplifying the sound of crashing waves and traffic. The commenter asks if the City has done noise studies related to this effect.

Noise measurements were conducted near the project site, as described on page 4.6-3 of the Draft EIR. These measurements account for existing noise in the vicinity, which would capture any noise that is amplified or reflected off existing buildings, as suggested by the commenter. Please refer to Figure 4.6-1 of the Draft EIR for the precise location of each noise measurement.

Response 4.2

The commenter expresses concern about the proposed height variance and states a preference for height variances only applying to low-lying areas. The commenter states that the building would dwarf the surrounding landscape, particularly the neighborhood to the east. The commenter states that the project would impact property values.

The project does not require a height variance, as the allowable building height is 30 feet (maximum building height elevation of 204.65 feet minus the average grade across the site of 174.65 feet), and the proposed building would not exceed this maximum allowable building height, with a +5 feet net height difference compared to existing development (refer to Table 2-3 of the Draft EIR). There would be a net increase of five feet in height between the existing development and proposed project (refer to Table 2-3 of the Draft EIR). Economic and social effects, such as potential changes to property values, are not considered significant impacts on the environment, pursuant to *CEQA Guidelines* Section 15131.

Response 4.3

The commenter states that traffic would be a problem, as visitors and vendors would use 2nd Street from Aviation to travel to Sepulveda to avoid waiting at the traffic light on 2nd Street. The commenter states this use of neighborhood streets would impede school safety and traffic safety, and cause a traffic jam between Peck Avenue and Sepulveda Boulevard on 2nd Street.

As shown on Figure 7-1 of Appendix C to the Draft EIR, only five percent of project trips, or 9.6 of 192 daily trips, would occur on 2nd Street during the PM peak hour. The majority of vehicles would travel on Sepulveda Boulevard and access the site via the Sepulveda Boulevard driveway. Additionally, as shown in Appendix C and Table 4.7-1 of the Draft EIR, the project would result in a net reduction in daily, PM peak hour, and Saturday peak hour trips compared to the existing commercial shopping center located on-site. Therefore, traffic issues in nearby neighborhoods and schools would not be exacerbated by the project, as total vehicle trips to the site would be reduced from existing conditions.

Response 4.4

The commenter states that the project will generate toxic waste, such as adult diapers and medications, requiring special treatment upon disposal.

Please refer to Appendix A of the Draft EIR. Appendix A describes the potential effects of hazardous materials, beginning on page 37 of the Initial Study. As stated therein, “[t]he assisted living facility would not involve the routine transport, use or disposal of hazardous substances.” As described in Section 2.5 of the Draft EIR, the project does not include a medical facility, and would therefore not generate medical waste.

Human wastes occur in every residential and non-residential property. Human waste is not considered a hazardous material and does not require special refuse treatment. Human wastes are sent to landfills and/or processed in sewer treatment plants for removal.

Response 4.5

The commenter states that the project will block natural air and light to the neighborhood east of the project site.

Please refer to Impact AES-1, beginning on page 4.1-9 of the Draft EIR. As described therein, and shown on Figures 4.1-5 and 4.1-6, for most of the year, the project would not cast shadows on adjacent residential uses to the east, and no public, shadow-sensitive areas would be shaded at any time during the year. The following detailed analysis of shading is provided:

The only time shadows would fall over residential uses east of the project site would be for approximately two hours, from 3:00 PM until sunset (approximately 5:00 PM in the winter months). During these two hours, the two adjacent residences (1120 5th Street and 1121 3rd Street) would be shaded by the project and a backyard pool (at 1126 5th Street) would be approximately half-shaded. Due to the location of the existing 30-foot building on the project site, one residence (1120 5th Street) already experiences the same amount and timing of shade. Therefore, the longer shadow in the late afternoon created by the proposed project during the winter months would affect only the one residence (1121 3rd Street) and the backyard pool (at 1126 5th Street). During the rest of the day and in other seasons, shadows would be minimal and/or would fall over non-shade-sensitive uses.

The proposed project would increase shading at one residence and half of an outdoor pool for approximately two hours during the winter months (with late December experiencing the longest duration of shade). The shading would not begin until about 3 PM. Based on the limited number of properties affected and the limited duration of increased shading (after about 3 PM during winter months), the project’s shade/shadow impact would be less than significant.

The City of Manhattan Beach General Plan acknowledges that ocean breezes from the west improve air quality in the City. However, as described in Section 4.2 of the Draft EIR, the project would not result in any significant and unavoidable air quality impacts. It should also be noted that the project would only increase the maximum height of buildings on the project site by 5 feet (refer to Table 2-3 of the Draft EIR for the height differences between existing and proposed buildings on site).

Response 4.6

The commenter states that the project is not needed, as two others are located within easy driving access. The commenter states that turnover at the existing facilities is high and can accommodate new residents.

This comment is unrelated to environmental impacts discussed in the Draft EIR. However, the comment is noted and has been passed on to decision-makers for review.

Response 4.7

The commenter states dislike for an international company replacing small businesses. The commenter states that existing Sunrise facilities in Hermosa Beach and Playa Del Rey can serve Manhattan Beach senior residents. The commenter states that the project would not serve residents or generate tax. The commenter states that residents of the project would not leave the facility or participate in community activities. The commenter states that seniors want to stay in their homes with caregivers, and would not mind moving to the Hermosa Beach facility. The commenter states that facilities like that of the proposed project focus on the beauty of the facility and will experience a high degree of staff turnover. The commenter states that employee burnout is high in this industry and memory care residents do not fully engage in the activities provided.

This comment is noted and has been passed on to decision-makers for review.

Response 4.8

The commenter states that the project would block sunlight into the neighborhood east of the project site. The commenter states that the project would block ocean breezes to the east.

Please refer to Response 4.5.

Response 4.9

The commenter recommends construction of a hardware store or art supply store on the project. The commenter states there are too many pharmacies and banks in Manhattan Beach.

This comment is unrelated to environmental impacts discussed in the Draft EIR. However, please refer to Chapter 6 of the Draft EIR, wherein Alternative 3 to the project would result in the construction of a retail development, similar to the suggested uses provided by the commenter. As noted in Section 6.3 of the Draft EIR, under Alternative 3, operational air quality and greenhouse gas emissions as well as traffic noise would be higher under Alternative 3 since retail land uses would result in higher traffic generation rates.

Response 4.10

The commenter states that affordable housing is needed in the City, such as loft style living with community shops on the first floor.

Section 2.6 of the Draft EIR provides the project objectives, which include providing 24-hour non-medical care to seniors in need and provide an assisted living facility that serves the local population. The commenter's suggested mixed-use (incorporating both residential and commercial uses) alternative would not achieve any of the stated project objectives and is not required to be analyzed in the EIR. This alternative would also require legislative action in the form of a revision to the site zoning and land use designations to allow the proposed residential component of the suggested alternative.

CEQA Guidelines Section 15126.6 explains that an EIR is not required to consider every conceivable alternative to a project, but must consider a reasonable range of alternatives. As described in Section 6 of the Draft EIR, three project alternatives were considered: No Project Alternative (no new development would occur), Reduced Intensity Project (construction of a smaller assisted living

facility), and Retail Alternative (construction of a retail development on the site). These three alternatives are considered to be a reasonable range of alternatives.

Response 4.11

The commenter states that east Manhattan Beach is losing family-owned and locally-owned restaurants, and there is no “lifestyle” experience because of new developments. The commenter expresses that the community is dividing into east and west as a result of these developments.

This comment is unrelated to environmental impacts discussed in the Draft EIR. However, the comment is noted and has been passed on to decision-makers for review.

Please refer to Impact LU-1, beginning on page 4.5-5 of the Draft EIR, regarding the project’s potential to physically divide an established community. As stated therein, this impact would be less than significant.

Response 4.12

The commenter states that 2nd Street and 5th Street should be closed to through traffic, as visitors and vendors to the project site would cut through the neighborhood at excessive speed and cause a safety issue of students and families.

Please refer to Response to Letter 3, above. As described therein, Figure 7-1 of Appendix C to the Draft EIR, shows that only five percent of project trips would occur on 5th Street, and these trips on 5th Street to the project site would not travel past the project site boundary into the neighborhood located west of the site. Similarly, Figure 7-1 of Appendix C to the Draft EIR shows that only five percent of project trips would occur on 2nd Street during the PM peak hour.

The majority of vehicles would travel on Sepulveda Boulevard and access the site via the Sepulveda Boulevard driveway. Additionally, as shown in Appendix C and Table 4.7-1 of the Draft EIR, the project would result in a net reduction in daily, PM peak hour, and Saturday peak hour trips compared to the existing commercial uses located on-site. Therefore, traffic issues in nearby neighborhoods would not be exacerbated by the project, as total vehicle trips to the site would be reduced from existing conditions.

Response 4.13

The commenter asks where small locally-owned businesses can be operated on the east side of Manhattan Beach.

This comment is unrelated to environmental impacts discussed in the Draft EIR. However, the comment is noted and has been passed on to decision-makers for review.

Response 4.14

The commenter states that emergency service vehicles would disrupt traffic flow adjacent to the project site.

As shown in Appendix C and Table 4.7-1 of the Draft EIR, the project would result in a net reduction in daily, PM peak hour, and Saturday peak hour trips. Therefore, new trips from emergency vehicles would not be expected impede traffic flows near the project site.

Response 4.15

The commenter states that trash pickup, linen delivery, and food delivery vehicles would be noisy and impede traffic flow.

Use of the loading dock area by trash collection and delivery vehicles is analyzed as part of Impact N-2, beginning on page 4.6-14 of the Draft EIR:

Noise from the use of the two loading dock spaces at the northeast corner of the site would be shielded by the proposed structure, as these spaces would be located interior to the underground garage. Because these spaces would be located in the subterranean garage, noise from loading activities would not be audible at adjacent receivers. Vehicle noise from traffic on 5th Street is described under Impact N-3, below, and includes delivery vehicle trips to the loading area.

As described under Impact N-3, on page 4.6-16 of the Draft EIR, the project would result in a decrease in traffic; therefore, traffic noise levels would not increase as a result of the project, including from trash collection and delivery vehicle trips on 5th Street to the project site loading dock entrance.

Additionally, because the project would result in a net decrease in daily, PM peak hour, and Saturday peak hour traffic, as compared to existing conditions, traffic flow would not be impeded by project-related trips as suggested by the commenter.

Response 4.16

The commenter states that Sepulveda Boulevard is dangerous, with regular accidents between 2nd Street and 8th Street. The commenter states that speeding is common.

This comment is noted and has been passed on to decision-makers for review.

Please refer to Appendix A of the Draft EIR, and page 4.7-9 of the Draft EIR regarding traffic safety. As stated on page 4.7-9 of the Draft EIR:

...impacts related to the congestion management plan, design features and incompatible uses, and emergency access would be less than significant because the project would: 1) reduce regional traffic in comparison to the existing traffic generated by the commercial shopping center; 2) design ingress and egress points consistent with City standards; and 3) undergo review by the City's emergency response personnel.

Response 4.17

The commenter asks how parking for visitors and employees will be kept out of the neighborhood.

Please refer to Section 2.5.2 of the Draft EIR, which states:

The proposed project would include one level of partially subterranean parking with 61 parking spaces. Three spaces would be accessible to persons with disabilities. The project would include infrastructure for 4 electric vehicle (EV) charging stations and 16 EV parking spots.

Therefore, parking would be provided on site to serve visitors and employees, and the project would not rely on the availability of neighborhood parking. The project is also consistent with the City's parking requirements for sites zoned CG-D8.

DEPARTMENT OF TRANSPORTATION

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*Making Conservation
a California Way of Life*

May 25, 2021

Ms. Angelica Ochoa
Community Development Department
City of Manhattan Beach
1400 Highland Avenue
Manhattan Beach, CA 90266

RE: Sunrise Assisted Living Facility
Vic. LA-01 PM 22.49
SCH # 2021040438
GTS # LA-2021-03562-DEIR

Dear Ms. Ochoa:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project would involve demolition of 14,562 square feet of commercial space. After demolition, a new assisted living facility, consisting 95 rooms (115 total beds) would be constructed.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has been codified into CEQA law. It mandates that CEQA review of transportation impacts of proposed developments be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts. As a reminder, Vehicle Miles Traveled (VMT) is the standard transportation analysis metric in CEQA for land use projects after the July 1, 2020 statewide implementation date. You may reference The Governor's Office of Planning and Research (OPR) website for more information.

<http://opr.ca.gov/ceqa/updates/guidelines/>

As a reminder, Caltrans has published the VMT-focused Transportation Impact Study Guide (TISG), dated May 20, 2020 and Caltrans Interim Local Development Intergovernmental Review Safety Review Practitioners Guidance, prepared on December 18, 2020.

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-12-22-updated-interim-ldigr-safety-review-guidance-a11y.pdf>

State Highway System

Sepulveda Boulevard (SR-01) is the only Regional Arterial in the City, and since it functions as a major business district, access was granted to retail businesses along the corridor, with left-turns prohibited or restricted to signalized intersections where feasible. Curbside parking is either prohibited all day or during the peak hours to facilitate the efficient movement of traffic. Regional access to the project site is generally provided by the I-405 (San Diego) Freeway. The I-405 (San Diego) Freeway is a major north-south freeway in the Southern California region that extends from the San Fernando Valley to Orange County. In the project vicinity, one high-occupancy vehicle (HOV)/carpool lane and four mainline travel lanes are provided in each direction on the I-405 Freeway. Because the I-405 Freeway is more than two miles east of the project site, multiple on and off-ramps in the vicinity provide options to access to the project study area.

Existing Transit Service

Public bus transit services are provided along major roadways within the project study area. Public bus transit service is currently provided by the Metropolitan Transportation Authority (Metro) along Sepulveda Boulevard, Manhattan Beach Boulevard, and Artesia Boulevard. Metro 126, 130, and 232 run along roadways in the project vicinity.

Pedestrian, Bicycle and Transit Facilities

Nearby restaurant and retail opportunities along the Sepulveda Boulevard corridor are accessible to pedestrians in the project vicinity via sidewalk. Pedestrian access to bus transit service in the project vicinity is provided by bus stops located on Sepulveda Boulevard to the north and south of the project site. Los Angeles County Metropolitan Transportation Authority (Metro) bus stops for Metro Route 232 are located on the northbound and southbound approaches at the Sepulveda Boulevard/8th Street and Sepulveda Boulevard/2nd Street intersections. Bicycle access in the vicinity of the project site is facilitated by the existing public roadway network and the City of Manhattan Beach bicycle roadway network.

Existing and proposed bikeways within the City. Numerous “bike friendly” streets striped with “sharrow” pavement markings are provided within a half-mile radius of the project site, including 8th Street, 2nd Street, Valley Drive, Ardmore Avenue, Pacific Avenue, Meadows Avenue, and Peck Avenue. In addition, Class III bike routes are provided along 11th Street and Oak Avenue. The City also proposed to provide a Class II bike

Letter 5

Ms. Angelica Ochoa

May 25, 2021

Page 3 of 3

lane along Manhattan Beach Boulevard (between Ardmore Avenue and Aviation Boulevard), with 11th Street and Oak Avenue proposed to become “bike friendly” streets.

Overall, the project would result in little or negative increase in vehicle trips, thus traffic impacts would be less than significant. The project meets the VMT screening criteria because it would not result in a net increase of 110 or more daily trips would result in fewer trips and therefore have a less than significant VMT impact.

Please be reminded that any work performed within the State Right-of-way will require an Encroachment Permit from Caltrans if the construction is at State Right-of-way. Any modifications to State facilities must meet all mandatory design standard and specifications.

For this project, transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans. It is recommended that large size truck trips be limited to off-peak commute periods and idle time not to exceed 10 minutes.

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # LA-2021-03562AL-DEIR.

Sincerely,

Frances Duong

FRANCES DUONG
Acting IGR/CEQA Branch Chief

email: State Clearinghouse

Letter 5

COMMENTER: Frances Duong, California Department of Transportation (Caltrans) District 7

DATE: May 25, 2021

Response

The commenter summarizes the proposed project, vehicle miles traveled (VMT) analysis guidelines, nearby highways, nearby transit service, and nearby pedestrian and bicycle facilities. The commenter states that the project would result in a net reduction in vehicle trips, and the determination of a less than significant impact is correct. The commenter states that work performed in State rights-of-way requires an Encroachment Permit from Caltrans, and State design standards and specifications must be met. The commenter states that this project will require a transportation permit from Caltrans for large size truck trips, and recommends these trips occur during off-peak commute periods and idle for less than 10 minutes.

This comment is noted. Section 2.7 of the Draft EIR acknowledges the need for an Encroachment Permit from Caltrans. Other permits required by Caltrans will also be acquired as needed.

Letter 6

From: [Angelica Ochoa](#)
Sent: Monday, June 7, 2021 9:08 AM
To: [Katherine Green](#)
Subject: [EXT] Sunrise - Public Comment No. 7

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From: Michael Beuder <mikebeuder@gmail.com>
Sent: Friday, June 4, 2021 2:23 PM
To: Angelica Ochoa <aochoa@citymb.info>
Subject: [EXTERNAL] Sunrise Assisted Living Facility - Draft EIR Comments

CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Issues with project:

- 6.1 1) The proposed facility is too large with too many rooms for the size of the property.
- 6.2 2) The height of the proposed facility will negatively impact all the residential property owners adjacent to, and directly east of, development.
- 6.3 3) Development doesn't fit Manhattan Beach.
- 6.4 4) Any entrances from (ingress), or exits to (egress), 5th Street are unacceptable; all traffic, including deliveries, trash, etc. need to be on Sepulveda Blvd.
- 6.3 5) Building needs to be redesigned to eliminate all vehicle traffic entrances and exits.
- 6.3 6) Existing power poles on 5th St. need to remain adjacent to new building in front of commercial property and not be moved east in front of homes in residential area. It would be acceptable if Sunrise Development paid for undergrounding the power and cable lines on 5th street between Sepulveda and Johnson.
- 6.4 7) 5th Street between Sepulveda and Johnson should be made a one-way traffic street (or blocked off at start of residential area) to minimize traffic impact of new (oversized) development. Similar to residential streets near new hotel development at the old Lococo's site and the street between Dominos and smog check business on west side of Sepulveda.

Please let me know if you have any questions. Thanks.

Mike Beuder
1121 5th St.
M.B., CA 90266



ANGELICA OCHOA
ASSOCIATE PLANNER

(310) 802-5517
aochoa@citymb.info

The City of Manhattan Beach cares about your health and safety. During state and local COVID-19 restrictions, most Community Development services are available [online](#) and various divisions can be reached at (310) 802-5500 or [Email](#) during normal City business hours. The [Citizen Self Service \(CSS\) Online Portal](#) is now available for City permit and planning applications and inspections.

Letter 6

CITY OF MANHATTAN BEACH 1400 Highland Avenue Manhattan Beach, CA 90266

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Letter 6

COMMENTER: Michael Beuder

DATE: June 4, 2021

Response 6.1

The commenter expresses an opinion that the project is too large for the size of the property and is out of character with the rest of Manhattan Beach. The commenter states the proposed height will affect residences to the east.

The potential aesthetic impacts of the project, including visual character and quality are discussed in Section 4.1, *Aesthetics*, of the Draft EIR. As stated therein, while the project would result in a visual change associated with the change in use, the unified design, varied exterior finishes, and increased landscaping would improve the visual quality of the site compared to existing conditions.

Replacement of existing on-site buildings with the proposed facility would introduce new sources of shade and shadow, but increased shading would be limited to two residential properties in late afternoon hours during winter months (refer to Impact AES-1, beginning on page 4.1-9 of the Draft EIR).

Response 6.2

The commenter states that entrances to the project site from 5th Street are unacceptable and all project traffic should be directed to Sepulveda Boulevard. The commenter states that the project should be redesigned to eliminate all vehicle traffic entrances and exits.

Section 2.5.2 of the Draft EIR describes the project site access as follows:

The main vehicular access to the subterranean parking garage would be provided on Sepulveda Boulevard with a separate service access (trash and deliveries) on 5th Street. The auto court access off Sepulveda Boulevard would allow for the pick-up and drop-off of residents and visitors.

While the majority of project traffic would access the site via Sepulveda Boulevard, trash and deliveries would use 5th Street to access the site. There would be no more than 10 total delivery trips each day (refer to page 4.2-13 of the Draft EIR). Additionally, it is not practical to eliminate all site access driveways, as on-site parking is required to be provided per Section 10.64.030 of the Manhattan Beach Municipal Code (MBMC).

Response 6.3

The commenter states that power poles on 5th Street should either remain in place and not be moved in front of residences to the east, or be undergrounded on 5th Street between Sepulveda Boulevard and Johnson Street.

The two existing power poles on 5th Street along the project site frontage would be undergrounded as part of the project. The remaining power poles on 5th Street are not located immediately adjacent to the project site and would not be modified by the project.

Response 6.4

The commenter suggests 5th Street between Sepulveda Boulevard and Johnson Street be converted to a one-way street or blocked off at the start of the residential area to minimize the impact of the project.

As stated in Response 6.2, no more than 10 total trips would be generated by the project on 5th Street. These trips would only use the portion of 5th Street adjacent to the project site, between the northeastern site boundary and Sepulveda Boulevard. Please refer to Appendix C of the Draft EIR for additional trip distribution information. As the increase in trips on 5th Street from the project is minimal and no significant traffic impact was identified (refer to Section 4.7, *Transportation and Traffic*), modifications to 5th Street are not warranted, and have the potential to cause unintended adverse circulation issues within the neighborhood.

Letter 7

Sunrise Senior Living Manhattan Beach Project
Draft Environmental Impact Report

Comments – June 4, 2021, Rev1. June 7, 2021

Name: Larry Hawkins and Lisa Uhrig
Address: 1125 3rd Street (1121 situs), Manhattan Beach, CA 90266
Phone: (310) 614-5562, (310) 283-1197
e-mail: lahawkins@verizon.net ; lisa@uhrigconsulting.com

7.1

- 1) Regarding Impact AES-1, page 4.1-9, the draft EIR states in several places that landscaping will be used to provide a tree buffer between the project and residential areas, specifically along the east boundary of the project overlooking the 3rd Street cul-de-sac and the residences along the boundary.
 - a. Section 4.1.2 Impact Analysis, page 4.1-11, the paragraph on 3rd Street states:
“The existing commercial shopping center is not visible from the 3rd Street cul-de-sac east of the project site. Under the proposed project, the upper floor of the assisted living building would be visible from 3rd Street. **However, the project would include a tree-lined landscaping buffer along the rear portion of the property near the 3rd Street cul-de-sac, consistent with the landscaping recommendations in the Sepulveda Boulevard Development Guidelines.** When mature, this buffer would soften the effects of the building, where visible from the 3rd Street cul-de-sac. Therefore, the project would not substantially degrade the visual character or quality of this neighborhood. Impacts to the 3rd Street cul-de-sac would be less than significant.”
 - b. Section 2.5.7 Landscaping Plan states that “vertical trees and layered ground plane plantings would be used along the edges of the site to provide separation from adjacent residential and commercial uses.”

However, there is currently no accommodation for such a tree buffer planted along the east boundary of the project (the 3rd Street side). As currently planned, the top of the retaining wall is too narrow to have a planter (see the right side of the South Elevation plan, Figure 2-11). The landscaping plan, Figures 2-13 and 2-14, show small trees at the first floor level, none of which are of a type that will likely reach the 30 foot height needed to provide the above mentioned buffer in the future. How will a tree buffer be provided?

7.2

- 2) We disagree with the statement on Impact N-1, page 4.6-13 that the impacts of construction noise levels would be less than significant.
 - a. The draft EIR predicts a maximum noise level of 72 dBA at the edge of our property (1125 3rd Street) after crediting a 6 dBA attenuation from the existing or new block wall.
 - b. The noise source is modelled at 75 feet from our wall because “Noise generated by mobile construction equipment is estimated from the center of the construction site because this equipment travels throughout the site and the distance to the center represents the average distance construction equipment would be from nearby receivers during any given day.” This approach makes sense for most of our distant neighbors, but not for us. Our living and daytime work quarters are 5 feet from the east boundary of the project and at the same level as the existing grade. Much time early in the project will be spent excavating and drilling very close to this border. It is very likely

Letter 7

- 7.2 cont. | that noise levels will exceed the 80 dBA limit in our home for significant time periods during the excavation.
- 7.3 | c. Page 4.6-14 states that the RCNM calculations for noise are included in Appendix F.
- 7.4 | i. Please show how the results in Appendix F are calculated from the reference levels. It appears that the reference distance for the equipment L_{max} values is 50 feet from the equipment, given there is a 3.6 dBA attenuation at 75 feet (84.4 dBA – 80.8 dBA for example) and 10.7 dBA attenuation at 175 feet. Is this correct?
- 7.5 | ii. If so, when the Auger Drill is operated closer than 50 feet from the east boundary of the project, the noise level will be likely be higher than the 84.4 dBA reference level. What noise level do you expect when equipment is operated closer to the east boundary of the project (for example at 25 feet)?
- 7.6 | iii. Please show, in the revised EIR, how the total Leq values (for the three listed machines) are derived from the individual L_{max} or Leq values in Appendix F.
- 7.7 | iv. Please improve the formatting to make the tables easier to read.
- 7.8 | d. We ask that temporary sound walls be used during (at minimum) the excavation phase of the project. These are commonly used at construction sites in the area. These may help to mitigate dust as well.
- 3) We disagree with the statement on Impact N-4, page 4.6-16 that the impacts of construction vibration levels would be less than significant.
- 7.6 | a. Several pieces of construction equipment are identified with the potential to generate 87 VdB at 25 feet, and the vibratory roller is listed at 94 VdB, the stated threshold level. The impact of this vibration is waved off by saying the equipment will be operated at greater than 25 feet from nearby structures.
- 7.7 | b. We have several concerns with this:
- 7.8 | i. In Appendix G, the reference vibration levels for the equipment listed are defined at 25 feet, but vibration levels at the receiver (5 VdB higher) are given at 15 feet. Why is there a discrepancy between Section 4.6 and Appendix G?
- 7.7 | ii. Which equipment will be used to drill soldier piles for shoring along the eastern boundary of the project? What is the vibration level associated with the equipment used for this process? This equipment will be operated closer than 25 feet from our house.
- 7.8 | iii. We assume the vibratory roller may be used at the bottom of the excavation (base of the garage) which may or may not be within 25 feet laterally from the caissons supporting our house. We would like more clarity on how close to the eastern boundary of the project and at what depth the vibratory roller will be used.
- 7.8 | iv. The frequency content of the equipment vibration and the resonance characteristics of our house and foundation (supported on caissons connected by grade beams) are not easily modelled and not considered; the potential vibration response of our house to the imposed equipment vibration may well be considerably higher than the stated values.
- 7.8 | c. The vibration imposed on our house are potentially significant and should be mitigated. Sunrise has indicated in a separate discussion that they would like to place vibration monitors in or around our house during construction. If agreed, such a measure could be effective if used to adjust construction activity to limit vibration in our house.

Letter 7

7.9

- 4) Regarding on site noise and vibration:
 - a. It is stated on page 4.6-11, that “HVAC and other mechanical equipment would be located in enclosed rooms”. This is welcome. Will this equipment be mounted on vibration isolators to limit vibration transmission to the foundation?
 - b. Regarding equipment in the garage, please elaborate on planned usage for the areas marked “Mechanical” in the garage floor plan (Figure 2-6 DEIR). Is this tool storage, operating equipment, or something else? Any operating equipment in the garage should be located away from the eastern boundary residences and closer the Sepulveda side of the property if possible.

Letter 7

COMMENTER: Larry Hawkins and Lisa Uhrig

DATE: June 7, 2021

Response 7.1

The commenter states that the Draft EIR indicates landscaping will be used to provide a tree buffer between the project site and residential areas, but states that there is no accommodation for a tree buffer along the east boundary of the project on 3rd Street. The commenter asks how a tree buffer will be provided, as there are only small trees shown on the landscaping plan that will not reach 30 feet in height.

Tree species to be planted along the eastern project site boundary include four *Lophostemon confertus* (Brisbane box) and one *Olea europaea* 'Swan Hill' (Swan Hill fruitless olive), as shown on Figure 2-13 on page 2-20 of the Draft EIR. The maximum tree height of Brisbane box trees is 50 feet,¹ and the mature height of common olive trees is 30 feet.² The top of the proposed building would be at approximately 204 feet in elevation in the southeastern portion of the project site, with the ground level where the trees are proposed to be planted at approximately 170 feet elevation; in this location, trees would need to be 34 feet in height to fully screen the proposed building. At maturity, the Brisbane box trees would exceed the height of the proposed building, providing the landscape buffer described in the Draft EIR. While the Swan Hill fruitless olive at maturity may not exceed the building height in this area, it would contribute to the landscape buffer, blocking a majority of the visible building west of its proposed planting location.

Response 7.2

The commenter disagrees with the Draft EIR construction noise impact conclusions. The commenter states that project construction will require excavating and drilling very close to the eastern boundary and to the commenter's residence (1125 3rd Street) and states that noise would exceed 80 dBA during excavation.

Noise from construction equipment was modeled at 75 feet, as this was determined to be the appropriate distance to model mobile construction equipment per the Federal Transit Administration (FTA) 2018 Transit Noise and Vibration Impact Assessment document. The FTA recommends this approach on page 177, stating that for the distance variable in the construction noise calculation "assumes that all equipment operates at the center of the project." It is a common, industry standard practice to analyze construction noise from the center of the site because this is the approximate center of where noise is being generated as equipment moves around the site throughout the day. Additionally, the FTA 80 dBA L_{eq} threshold used in the analysis is based upon the average construction noise throughout a typical construction day (i.e., 8 hours).

The commenter references that construction noise would exceed the 80 dBA limit at their house during portions of the day. As stated above, the limit used is an 8-hour average of 80 dBA L_{eq} , per FTA recommendations; therefore, it is appropriate to look at the 8-hour average of noise and not potential peaks in noise during shorter durations. In addition, the City of Manhattan Beach does not

¹ <https://selectree.calpoly.edu/tree-detail/1425>

² <https://olivetreefarm.com/swan-hill-fruitless-olive-trees/>

provide a quantitative standard for construction noise; therefore, the EIR conservatively used a quantitative standard from the FTA.

Response 7.3

The commenter asks how the RCNM results in Appendix F were calculated, and requests confirmation that the attenuation at 75 feet is 3.6 dBA and at 175 feet is 10.7 dBA.

As described on page 4.6-10 of the Draft EIR:

Construction noise was estimated using the Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM). RCNM predicts construction noise levels for a variety of construction operations based on empirical data and the application of acoustical propagation formulas. RCNM provides reference noise levels for standard construction equipment, with an attenuation rate of 6 dBA per doubling of distance for stationary equipment and 3 dBA per doubling of distance for mobile equipment. The model does not take into consideration topographic variation or specific staging locations³ of construction equipment; therefore, this analysis represents a conservative evaluation of anticipated construction noise levels.

RCNM uses construction equipment noise data at 50 feet (L_{max}) to calculate the L_{max} and L_{eq} at the input receptor distance (RCNM User's Guide, January 2006).

Response 7.4

The commenter asks what noise level can be expected when an auger drill is operated closer than 50 feet from the eastern project site boundary, such as at 25 feet.

Noise from construction equipment was not modeled at 25 feet, as it was determined that 75 feet was the appropriate distance to model mobile construction equipment as the threshold used is based upon an 8-hour average for the construction equipment analyzed, per FTA recommendations.

It should be noted that the commenter is referencing the L_{max} (i.e., maximum instantaneous noise level) for an auger drill rig of 84.4 dBA L_{max} . The more appropriate value to analyze is the L_{eq} value, as this is the time-averaged noise level that gives consideration of the drill not being in operation for eight continuous hours. According to RCNM, an auger drill rig would generate a noise level of 83.4 dBA L_{eq} at 25 feet, which would be reduced by approximately 6 dBA due to the existing wall, for a noise level of 77.4 dBA L_{eq} at the adjacent residence. This is assuming the auger drill rig operates at a single distance closer than the center of the project site, which is conservative as it is not consistent with FTA recommendations. This would be below the FTA's construction noise standard.

Please refer to Response 7.2 for additional discussion.

Response 7.5

The commenter asks how total L_{eq} values for the three modeled construction equipment are derived from the L_{max} or L_{eq} values in Appendix F. The commenter requests that tables be reformatted and that temporary sound walls be used during the excavation phase.

³ Intervening topography (such as hills or berms) or other barriers (such as existing buildings, walls, or vegetation) could result in a higher noise attenuation rate because these elements would block direct line-of-sight between noise-generating construction equipment and the nearest receivers.

RCNM calculates L_{eq} from L_{max} based on equipment types, equipment usage factors, and the selected adjustment factor (defaults were used in the RCNM model for this project). The following formula is used (RCNM User's Guide, January 2006):

$$L_{eq} = L_{maxCalc} + 10 * \log (UF\% / 100)$$

where $L_{maxCalc}$ = the calculated L_{max} , and UF% = the equipment usage factor in percent

The Appendix F file has been reformatted for increased clarity. Please refer to the new Appendix F included in this document.

An existing noise wall along the project site's eastern boundary would be protected in place during construction on the project site and would attenuate construction noise as is. An attenuation of 6 dBA was applied to account for this existing noise wall.

Response 7.6

The commenter disagrees with the Draft EIR vibration noise impact conclusions. The commenter states that the vibratory roller would generate vibration of 94 VdB at 25 feet and that the impact is written off as saying equipment will be operated at distances greater than 25 feet. The commenter states that there is a discrepancy in Appendix G where vibration levels are provided at 15 feet.

The commenter correctly noted a discrepancy between Appendix G and Section 4.6 of the Draft EIR. The correct analysis distance for vibration impacts is 25 feet, as site constraints would limit the ability of vibratory construction equipment to access areas of the site directly adjacent to the property lines (refer to table footnote 1 on page 4.6-17 of the Draft EIR). Appendix G has been updated accordingly to reflect the 25-foot distance to the nearest receiver and is attached to this document.

Response 7.7

The commenter asks what equipment will be used to drill piles along the eastern project boundary, and what the vibration level associated with that equipment is. The commenter states that this equipment would be operated closer than 25 feet from their residence. The commenter asks for additional specification on the distance and depth that vibratory rollers would be used.

As stated on page 2-19 of the Draft EIR:

A drill rig, two front-end loaders, two dump trucks, two bobcats, an excavator, a paving machine, a plaster pump with hopper, two boom reaches, three extended reach forklifts, and two cranes would be used during demolition and construction. Some difficulty may be encountered in the drilling of soldier beams because of caving in the sandy soils. Special techniques and measures, such as casing or drilling mud, may be used for proper installation of the soldier piles and/or tie-back anchors.

Site constraints would prevent the drill rig from operating within 25 feet of the nearest residence. As described in Table 4.6-6 on page 4.6-17 of the Draft EIR, caisson drilling was used as a proxy for the drill rig to install piles. Caisson drilling has a vibration of 87 VdB at 25 feet; however, drill rigs would likely be used at 50 feet from the nearest residence due to site constraints.

Additionally, the vibratory roller would not be operated within 25 feet of the nearest residence due to site constraints (refer to footnote 1 of Table 4.6-6 on page 4.6-17 of the Draft EIR).

Response 7.8

The commenter states that the frequency content of vibratory equipment and the resonance characteristics of the commenter's residence foundation, which is supported on caissons connected by grade beams, was not modelled or considered. The commenter states that vibration at their residence is potentially significant and should be mitigated. The commenter mentions that vibration monitors on or around their residence would be effective to adjust construction activity to limit vibration at their residence.

Construction vibration impacts are addressed under Impact N-4, beginning on page 4.6-16 of the Draft EIR. As stated therein, vibration would not exceed 94 VdB at a distance of 25 feet. This level of vibration is considered distinctly perceptible, and vibration in excess of 100 VdB has the potential to damage typical buildings. Due to the distance between the location of vibration-generating equipment on the project site and the nearest receivers, vibration levels would not exceed the FTA threshold of 94 VdB and would not exceed the 100 VdB threshold for damage to buildings. Therefore, the commenter's suggested vibration mitigation is not necessary, as vibration impacts would be less than significant.

Based on City records, the commenter's residence was constructed in 2005. It can be reasonably assumed that modern construction techniques were used to construct this residence, and that the residence is not a fragile building that may be more sensitive to vibration than typical buildings.

Response 7.9

The commenter expresses appreciation that HVAC and mechanical equipment would be enclosed within the buildings and asks if this equipment would be mounted to limit vibration. The commenter asks for clarification of areas marked "Mechanical" on the project floor plan, requesting that equipment to be stored in this area be specified. The commenter requests that equipment in the garage be located as far from the eastern site boundary as possible.

Proposed mechanical equipment located in the garage-level mechanical rooms would be mounted on raised curbs. Such equipment includes HVAC units, condensing units, water heaters, and data equipment. HVAC and condensing units would be in the open-air mechanical rooms, and water heaters and data equipment would be in enclosed mechanical rooms. The open-air mechanical rooms are located along the eastern and southern boundaries of the project site.

The commenter's request is noted and passed on to decision-makers.

Letter 8

Dear Ms. Ochoa,

This text is regards to the development of 250-400 North Sepulveda.

I am so concerned about two of the items in your Environmental impact report.

8.1

1. The geology & soils report -

the impact it will have to the

homes surrounding the construction site.

Our home shook terribly when the 2 homes were built below the site. I can't what will happen when the this huge project takes place.

What should we do, if we encounter problems with our home?

8.2

2. During the construction where are all the workers trucks going to park?

2nd & Sepulveda to 2nd & Meadows already has no parking on Monday & Tuesday.

And living off 2nd Street there is never parking in front or 4-5 blocks away.

And please have the Development company furnish more parking spaces on their property for employees as well as visitors.

I am thanking you in advance for your consideration in addressing theses issues.

Jane Schonberger

231 Johnson St.

Letter 8

COMMENTER: Jane Schonberger

DATE: June 4, 2021

Response 8.1

The commenter expresses concern regarding geology and soils, asking how construction would impact homes surrounding the project site. The commenter expresses concerns regarding construction vibration and asks what to do if there are problems with their home.

Potential impacts related to geology and soils are addressed in Section 4.3, *Geology and Soils*, of the Draft EIR. As described therein, with mitigation, the proposed project would not cause potential adverse effects related to seismic ground-shaking, liquefaction, erosion, landslide, lateral spreading, subsidence, collapse, or expansive soils.

The commenter's residence (231 Johnson Street) is located approximately 380 feet from the southeastern corner of the project site. Construction vibration impacts are addressed under Impact N-4, beginning on page 4.6-16 of the Draft EIR. As stated therein, vibration would not exceed 94 VdB at a distance of 25 feet from the project site, and vibration decreases by approximately 6 VdB per doubling of distance, and therefore vibration would not exceed 88 VdB at 50 feet, or 82 VdB at 100 feet. This level of vibration is considered distinctly perceptible, and vibration in excess of 100 VdB has the potential to damage typical buildings. Due to the distance between the project site and the commenter's residence, vibration levels would attenuate substantially between the site and the commenter's residence, well below the FTA threshold of 94 VdB.

Response 8.2

The commenter asks where construction worker vehicles will park, and states that there is no parking on Monday and Tuesday at 2nd Street/Sepulveda Boulevard and 2nd Street/Meadows Avenue. The commenter states that there is rarely parking available on 2nd Street. The commenter suggests the project include more parking on site for employees and visitors.

As stated in Section 2.5.4, *Construction and Grading*, construction staging would be on site. There would be a mix of on- and off-site construction worker parking availability depending on the construction stage, though on-site parking would be used as much as possible. Once the parking garage is built, the interior of the garage could be used for this purpose. Some off-site construction worker parking would be located nearby within walking distance, such as vacant lots at Sepulveda Boulevard/8th Street and Duncan Avenue/Sepulveda Boulevard. Additionally, a paid parking lot near Sepulveda Boulevard/10th Street could be used if additional parking spaces are required.

As described under Section 2.5.2, *Parking and Site Access*, the project would provide 61 subterranean parking spaces on site for employees and visitors, with an additional two parking spaces in the ground-level auto court. Section 10.64.030 of the MBMC requires one off-street parking space per three beds in residential care districts (plus additional spaces specified by the Use Permit). The project would provide 115 beds; therefore, a minimum of 39 parking spaces would be required. As the project exceeds this amount of parking, there is no requirement to provide additional parking on site.

3 Revisions to the Draft EIR

Chapter 3 presents specific changes to the text of the Draft EIR that are being made in response to comments received or to make corrections. In no case do these revisions result in a greater number of impacts or impacts of a substantially greater severity than those set forth in the Draft EIR. Where revisions to the main text are called for, the page and paragraph are set forth, followed by the appropriate revision. Added text is indicated with underlined and deleted text is indicated with ~~strikeout~~. Page numbers correspond to the page numbers of the Draft EIR.

No changes have been made to the text of the Draft EIR. However, revised versions of Appendix F and Appendix G are included herein to address comments received on the Draft EIR.

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Appendix F

Revised Roadway Construction Noise Model (RCNM) Calculations

Roadway Construction Noise Model (RCNM), Version 1.1

Report date: 6/14/2021
Case Description:

---- Receptor #1 ----

		Baselines (dBA)		
Description	Land Use	Daytime	Evening	Night
Residences along eastern boundary	Residential	57.5	57.5	57.5

		Equipment				
		Spec	Actual	Receptor	Estimated	
Description	Impact	Lmax	Lmax	Distance	Shielding	
	Device	Usage(%)	(dBA)	(feet)	(dBA)	
Auger Drill Rig	No	20	84.4	75	0	
Excavator	No	40	80.7	75	0	
Front End Loader	No	40	79.1	75	0	

		Results													
		Calculated (dBA)				Noise Limits (dBA)				Noise Limit Exceedance (dBA)					
		Day		Evening		Night		Day		Evening		Night			
Equipment		*Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq
Auger Drill Rig		80.8	73.8	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Excavator		77.2	73.2	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Front End Loader		75.6	71.6	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total		80.8	77.8	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

*Calculated Lmax is the Loudest value.

---- Receptor #2 ----

		Baselines (dBA)		
Description	Land Use	Daytime	Evening	Night
Seahorse Inn	Residential	73	73	73

		Equipment				
		Spec	Actual	Receptor	Estimated	
Description	Impact	Lmax	Lmax	Distance	Shielding	
	Device	Usage(%)	(dBA)	(feet)	(dBA)	
Auger Drill Rig	No	20	84.4	170	0	
Excavator	No	40	80.7	170	0	
Front End Loader	No	40	79.1	170	0	

		Results													
		Calculated (dBA)				Noise Limits (dBA)				Noise Limit Exceedance (dBA)					
		Day		Evening		Night		Day		Evening		Night			
Equipment		*Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq
Auger Drill Rig		73.7	66.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Excavator		70.1	66.1	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Front End Loader		68.5	64.5	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total		73.7	70.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

*Calculated Lmax is the Loudest value.

Appendix G

Revised Vibration Analysis Worksheet

Groundborne Noise and Vibration Modeling

Notes

The reference distance is measured from the nearest anticipated point of construction equipment to the nearest structure.

Equipment	Reference Level Inputs			
	PPV _{ref} (in/sec)	Lv _{ref} (VdB)	RMS _{ref} (in/sec)	Reference Distance
Vibratory Roller	0.210	94	0.050	25
Hoe Ram	0.089	87	0.022	25
Large bulldozer	0.089	87	0.022	25
Caisson drilling	0.089	87	0.022	25
Loaded trucks	0.076	86	0.020	25
Jack hammer	0.035	79	0.009	25
Small bulldozer	0.003	58	0.001	25

Equipment	Vibration Level at Receiver			
	Distance (feet)	PPV _x (in/sec)	Lv _x (VdB)	RMS _x (in/sec)
Vibratory Roller	25	0.210	94	0.050
Hoe Ram	n/a	n/a	n/a	n/a
Large bulldozer	25	0.089	87	0.022
Caisson drilling	25	0.089	87	0.022
Loaded trucks	50	0.035	79	0.009
Jack hammer	n/a	n/a	n/a	n/a
Small bulldozer	n/a	n/a	n/a	n/a

Source

FTA 2018
Last Updated: 6/14/2021