

From: Craig Rogers <craiger522@gmail.com>

Subject: 210 PCH - 5/21 Hearing

Date: May 20, 2024 at 6:04:56 PM PDT

To: Commissioner Peter Hoffman <phoffman@hermosabeach.gov>, Commissioner Marie Rice <mrice@hermosabeach.gov>, Commissioner David Pedersen <dpedersen@hermosabeach.gov>, khirsh@hermosabeach.gov, Commissioner Stephen Izant <sizant@hermosabeach.gov>

Hello,

My opposition letter is attached.

Thank you!
Craig Rogers

Honorable Commissioners,

RE: 210 PCH

As stated on page 11 of the traffic study it assumed a drop off time of 5 min. “based on a turnover rate of 5 minutes per vehicle per space and **assuming a uniform arrival pattern.**”

To test this theoretical traffic projection against real-world data, on Friday 5/17, I monitored and logged the drop-offs from 6:45am – 8:32am at a similar daycare facility at Children's Journey Learning Center located at 332 S Pacific Coast Hwy, Redondo Beach.

During the period of 7:53am – 8:32am (39 minutes), there were a total of 55 vehicles dropping off children. Of these **drop-offs, 14 took 10-14 minutes, and 20 took 9 minutes or more.** I believe this is because of the required sign-in process.

Also, those who took longer probably had brief conversations with staff about their child's needs or behavior, or with other parents they know. (Some of these parent-parent conversations occurred in the parking lot).

Also, many younger children have trouble with the drop off process. Here's what many experts have to say:

How to make drop off at daycare easier?

Tips to make daycare drop off easier - for parent and child

1. Bring something familiar. ...
2. Create a goodbye ritual. ...
3. Talk it through. ...
4. Try a gradual start. ...
5. Do your research. ...
6. Create a night-before checklist. ...
7. Do regular check-ins. ...
8. Expect some tears.

At the peak time (7:53am – 8:32am), the number of parent cars in the parking lot ranged from 9 to 14 cars. Similarly, the departures happened in clusters. This significantly exceeds the estimates put forth in the applicant's report.

This traffic volume would be disastrous for the 2nd Street residents AND the daycare customers, and would present a serious problem for emergency vehicles trying to travel east on 2nd St. from PCH.

Also, this congestion will impede cars traveling north on PCH from turning right on 2nd St, thereby blocking the right lane of northbound traffic on PCH.

To add to the congestion, there is **No Right Turn on Red** at the signal going **west from 2nd turning on to PCH**, which stops all flow until the light changes.

Also, the proposed “Keep Clear” road paint will **make those traveling west on 2nd wait to enter the lot and just allow those from PCH traveling east on 2nd to get in**, once they finally get into the mouth of 2nd.

When the light does change, there is **only 17 seconds to turn left** and there is generally **always a pedestrian in the sidewalk that you must wait for, which takes up a lot of that 17 seconds**.

These concerns were also raised by Public Works, forcing a new traffic study.

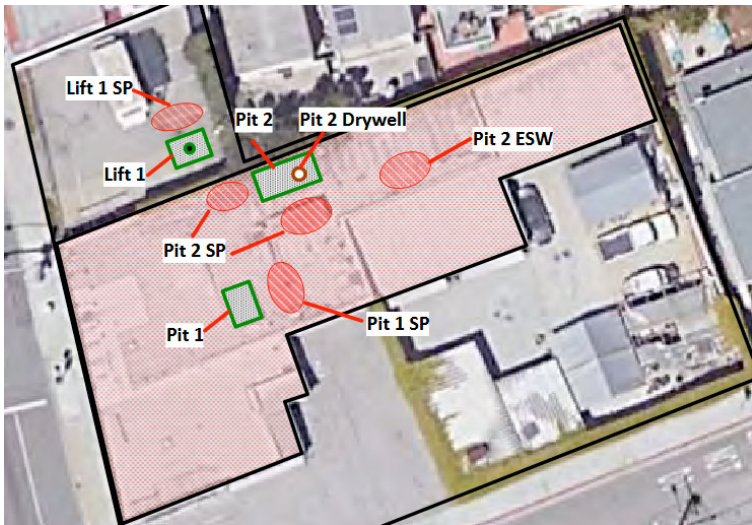
There are still **areas of the site that have not been tested and remediated**, so this plan is **not CEQA exempt** and a **CEQA study must occur**.

The environmental work/report was done for a prior owner, so there is **no warranty now per the report**, for the **applicant to make representation to the planning commission or to parents and the city**, and the applicant would be subject to liability from the parents:

This evaluation should not be relied upon by other parties without the express written consent of EAI or Client; therefore, any use or reliance upon this environmental evaluation by a party other than the Client or the Reliance Parties, shall be solely at the risk of such third party and without legal recourse against EAI,

This is just some of what was found at the site in the environmental report, including **high levels of lead and cadmium**:

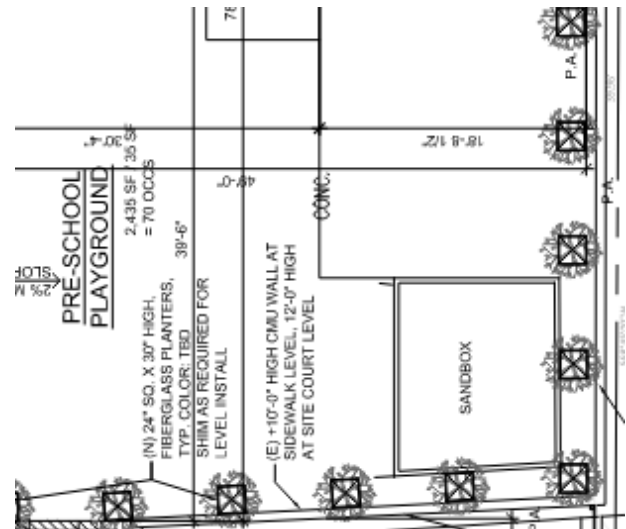
Title 22 Metals concentrations in both samples appeared reflective of naturally occurring or background concentrations, except for lead in samples #Pit 2 Drywell (10,200 mg/kg), #Pit 2 SP-A (541 mg/kg), and #SP-B (983 mg/kg). In addition, anomalously high concentrations of cadmium (138 mg/kg), chromium (308 mg/kg), and copper (648 mg/kg) were reported in sample #Pit2 Drywell. Laboratory analytical results are summarized in Table 1 (attached).



Additionally, **no sampling was done where a lot of work occurred on cars/painting in the back garages**, nor in the area where the **playground** is planned. You can see in the image to the left there were multiple outdoor work areas and painting booths where the soil was not tested for environmental hazards and contaminants,

From the report, **they only sampled and remediated where the green boxes are**. The red circles are where they temporarily laid the contaminated soil. In the **proposed play yard**,

you can see where there were many car paint booths in the past.



The discolored area in the pic above left is of a prior paint booth area, and in the pic to the top right is where the proposed sandbox will be located in the same spot. The pic in the top left still looks to have dried chemicals on the cement.



There are numerous **cracks in the cement** and **a drain** in the pic to the left where outdoor autobody and painting work occurred over several decades.

They sampled the tank and drain for chemical on the other side of the lot, **but not this drain.**



Hazardous chemicals and solvents would have leached into the soil through this drain and cracks where they want to **excavate** and plant grass and a large tree, which will **aerosolize these chemicals, and leave them in the soil.**



The small square in this pic appears to be an area where soil was tested on the front of the lot, but not called out in the Summary of Remedial Excavation and Confirmation Sampling.



These are chemical containers that seem to have dried chemicals on the concrete that is currently in the proposed play yard.

Below is an excerpt from the 210 PCH Master File from a prior hearing for the site.

PLANNING COMMISSION MINUTES - DECEMBER 4, 1984

ZONE CHANGE AT 821 2nd STREET FROM R-1 WITH C-POTENTIAL TO C-3 (Cont.)

Mr. Sullivan stated that on Mr. Felder's property, there are paint cans and solvents outside. He felt that this may be violating OSHA's rules, noting the potential for explosions. He noted that workers use spray paint cans and the fumes must go up at least ten feet into the air. He also noted that the wind factor carries all noise uphill. He also stated that the workers there do not wear masks while painting.

Some of the chemicals found and listed in the environment report produced by the applicant are **carcinogenic/harmful to humans, especially infants/children, and some of them were double the legal limit:**

m,p-Xylene	4200	500	ug/Kg
Naphthalene	ND	5000	ug/Kg
n-Butylbenzene	ND	500	ug/Kg
N-Propylbenzene	ND	500	ug/Kg
o-Xylene	3300	500	ug/Kg
p-Isopropyltoluene	ND	500	ug/Kg
sec-Butylbenzene	ND	500	ug/Kg
Styrene	ND	500	ug/Kg
Tert-amyl-methyl ether (TAME)	ND	990	ug/Kg
tert-Butyl alcohol (TBA)	ND	5000	ug/Kg
tert-Butylbenzene	ND	500	ug/Kg
1,1,1,2-Tetrachloroethane	ND	500	ug/Kg
1,1,2,2-Tetrachloroethane	ND	500	ug/Kg
Tetrachloroethene	580	500	ug/Kg
Toluene	790	500	ug/Kg
trans-1,2-Dichloroethene	ND	500	ug/Kg
trans-1,3-Dichloropropene	ND	500	ua/Ka

Ethylbenzene	1200	490
Ethyl-t-butyl ether (ETBE)	ND	980
2-Hexanone	ND	4900
Isopropylbenzene	ND	490
Methylene Chloride	ND	4900
4-Methyl-2-pentanone	ND	4900
Methyl-t-Butyl Ether (MTBE)	ND	490
m,p-Xylene	5300	490
Naphthalene	ND	4900
n-Butylbenzene	ND	490
N-Propylbenzene	ND	490
o-Xylene	3900	490
p-Isopropyltoluene	ND	490
sec-Butylbenzene	ND	490
Styrene	ND	490
Tert-amyl-methyl ether (TAME)	ND	980
tert-Butyl alcohol (TBA)	ND	4900
tert-Butylbenzene	ND	490
1,1,1,2-Tetrachloroethane	ND	490
1,1,2,2-Tetrachloroethane	ND	490
Tetrachloroethene	1100	490
Toluene	3000	490
trans-1,2-Dichloroethene	ND	490
C19-C20	9.5	4.9
C21-C22	15	4.9
C23-C24	22	4.9
C25-C28	48	4.9
C29-C32	46	4.9
C33-C36	29	4.9
C37-C40	14	4.9
C41-C44	7.9	4.9
C6-C44	200	4.9
Arsenic	4.01	0.765
Barium	110	0.510
Beryllium	0.265	0.255
Cadmium	2.03	0.510
Chromium	29.5	0.255
Cobalt	4.11	0.255
Copper	59.7	0.510
Lead	541	0.510

Considering there has been **no sampling at any of the garages, paint booths or work lot, this plan requires a CEQA study** and would not be **safe** for infants and children.

This CUP should be denied,
Craig Rogers