FINAL

ADDENDUM TO THE PREVIOUSLY CERTIFIED
FINAL ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE
BEACH CITIES HEALTH DISTRICT HEALTHY LIVING CAMPUS MASTER PLAN
State Clearinghouse (SCH) No. 2019060258

October 2026

1 Introduction

California Environmental Quality Act (CEQA) Guidelines Sections 15162 through 15164 set forth criteria for determining the required additional environmental documentation when a previously certified Environmental Impact Report (EIR) has been prepared for a project for which a subsequent discretionary action is necessary.

CEQA Guidelines Section 15162(a) and 15163 state that when an EIR is certified for a project, no Subsequent or Supplemental EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in light of the whole public record, one or more of the following:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:
    a. The project will have one or more significant effects not discussed in the previous EIR; or
    b. Significant effects previously examined will be substantially more severe than shown in the previously certified EIR; or
    c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
    d. Mitigation measures or alternatives which are considerably different from those analyzed in the EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

CEQA Guidelines Section 15164(a) states that an addendum to a previously certified EIR may be prepared if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a Subsequent or Supplemental EIR have occurred.

If the criteria listed in CEQA Guidelines Sections 15162, 15163, or 15164 have not occurred or are not met, no changes to the previously certified EIR are necessary.

As discussed in this Addendum and supporting Environmental Review Checklist, the revised Project would represent a reduction in the scope of development as compared to the proposed Project. There are no substantial changes in the circumstances under which the revised Project would be undertaken that would require major revisions to the previously certified EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously impacts to Noise, Aesthetics and Visual Resources, Air Quality, Biological Resources, Cultural Resources and Tribal Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, and Transportation, or any other environmental resources evaluated pursuant to CEQA. Further, there is no "new information of substantial importance" as defined in CEQA Guidelines Section 15162(a)(3).

It is the finding of Beach Cities Health District (BCHD) that the previously certified EIR as herein amended, may be used to fulfill the environmental review requirements of the Sunrise Senior Living Project. Because the proposed subsequent improvements meet the conditions for the application of CEQA Guidelines Section 15164, preparation of a subsequent or supplemental EIR is not required.

2 Background on the Previously Certified Environmental Impact Report:

In 2017, BCHD began investigating escalating maintenance costs and seismic-related structural issues associated with the former South Bay Hospital, originally constructed in 1958. Following initial public outreach with neighbors, residents, and community leaders in May 2017, BCHD formed a 20-person Community Working Group (CWG) to engage local participants in the planning of a modernized campus that would be integrated with the surrounding community including Redondo Beach and Torrance. The CWG held 17 meetings to discuss various components of the proposed Healthy Living Campus Master Plan and was eventually dissolved in December 2020 following the conclusion of the preliminary planning and design phases for the proposed Healthy Living Campus Master Plan. BCHD staff also conducted outreach for the Healthy Living Campus Master Plan through study circles, Community Open Houses, and focused outreach meetings for participants to discuss and share insights on the proposed Healthy Living Campus Master Plan.

The BCHD Healthy Living Campus Master Plan proposed to redevelop the existing BCHD campus in two phases:

- Phase 1 – Preliminary Site Development Plan
    - Residential Care for the Elderly (RCFE) Building (203,700 square feet [sf]), including:
        - New Assisted Living Units (157 units)
        - New PACE Services (14,000 sf)
        - New Youth Wellness Center (9,100 sf)
        - Relocation of Memory Care Units (60 units)

        - Relocation of Community Services Space (6,270 sf)
    - Demolition of the Beach Cities Health Center (158,000 sf)
    - Demolition of the Maintenance Building (3,200 sf)

- Phase 2 – Development Program
    - New Wellness Pavilion (37,150 sf)
    - New Aquatics Center (31,300 sf)
    - Relocation of Center for Health and Fitness Back to the Campus (20,000 sf)

In June 2019, BCHD published a Notice of Preparation (NOP) announcing the preparation of an EIR evaluating the physical environmental impacts of the Healthy Living Campus Master Plan. The Draft EIR was made available for public review in March 2021, and the Final EIR, including responses to comments, was certified in September 2021. The Final EIR concluded that construction-related noise (Impact NOI-1) was the only significant and unavoidable impact, while all other impacts could be reduced to a less than significant level with mitigation or would be less than significant without mitigation. In November 2021, BCHD adopted the CEQA Findings and Statement of Overriding Considerations (SOCs) as well as the Mitigation, Monitoring, and Reporting Program (MMRP), adopted and incorporated into the Project all of the mitigation measures identified in the Final EIR, and approved Healthy Living Campus Master Plan Alternative 3 (the Revised Access and Circulation Alternative) identified in the Final EIR, with the minor modification to the step-backs, necessary to incorporate the reduction in height required by MM VIS-1 (approved Project).

3 Lead Agency Name and Address:

Beach Cities Health District
514 North Prospect Avenue
Redondo Beach, CA 90277

4 Development on the BCHD Campus following the Previously Certified Environmental Impact Report

Following the filing of the Notice of Determination (NOD) in November 2021, BCHD began a search for a developer, operator, and design-build team; however, with the changes in the supply chain and lingering economic conditions following the COVID-19 pandemic, the financing related to the approved Project changed dramatically. Initial agreements with the selected developer, operator, and design-build team fell through, after which BCHD pursued an unsuccessful bond measure (Measure BC).

In an effort to continue advancing its Healthy Living Campus vision, the BCHD Board of Directors announced that it would



The allcove Beach Cities facility broke ground on May 16, 2026. This new 9,400-sf facility, which will open in Spring 2027, will be dedicated to supporting the health and well-being of young people in our community.

release a Request for Expressions of Interest (RFEOI) for potential partners to redevelop the former South Bay Hospital Site. The Board held a public study session regarding the RFEOI – the first step in soliciting new ideas from potential partners about how to redevelop the site and what kinds of health services could be offered where the former hospital building now stands. The Board issued the RFEOI on June 30, 2025 and received responses from prospective partners on August 7, 2025 as well as second responses from select partners on September 24, 2025.

As the Board evaluated responses to the RFEOI, BCHD also initiated the design and development of a Youth Wellness Center on the vacant Flagler Lot. This facility will serve as a permanent home for allcove Beach Cities, which offers mental and physical health services, education and employment assistance, peer and family support, and substance use prevention programs for young people ages 12-25 in the greater South Bay of Los Angeles County. Similarly, work began on the new Program for All-Inclusive Care for the Elderly (PACE) in Building 510, with more work to start shortly on the new home of the Center for Health and Fitness (CHF) one floor up from the PACE location. Additionally, the BCHD Community Services operations space was removed from the Project site and relocated to the BCHD Administrative Office at 1200 Del Amo Street, Redondo Beach. The relocation of the Youth Wellness Center, PACE and the Community Services resulted in the reduction of 29,370 square feet and associated trips to/from the BCHD Campus.

Sunrise Senior Living
Conceptual Site Plan

Proposed New Development	
A	allcove Beach Cities
B	Sunrise Senior Living Community
C	Indoor Community Commons
D	Pool
E	Outdoor Community Commons
F	Wellness Path
G	Sunrise Community Parking



The Sunrise Senior Living Project would involve the construction of a senior living community facility no greater than 279,000 sf with ancillary amenities, including a nature trail/walking loop. The facility would be centrally located on the BCHD campus and surrounded by surface parking.

On June 25, 2025, the BCHD Board of Directors held a public study session to discuss the Request for Expressions of Interest (RFEOI), the first step in engaging potential partners to reimagine the site. The goal was to find a partner and concept that aligned with BCHD's mission to support community health and wellness, while also addressing Healthy Living Campus priorities including seismic safety, sustainable revenue generation and community health needs.

The RFEOI included criteria informed by years of public feedback, emphasizing integration with the surrounding community, lower building heights, reduced density and inclusion of open space.

Potential future uses for the site include options that align with the scope of services BCHD is authorized to provide under California Healthcare District law, including Residential Care for the Elderly (RCFE) and medical and wellness services. An Advisory Working Group (AWG) made up of residents, staff and a BCHD Board Member reviewed submissions. Since the October 22, 2025 Board meeting, BCHD held a Strategic Development Half-Day session on October 31, 2025, that reaffirmed the BCHD's mission alignment, reviewed financial objectives and refined evaluation priorities. The Advisory Working Group then conducted interviews and tours with the three shortlisted development teams to further assess their proposals, with a focus on community integration, financial feasibility, and alignment with BCHD's Healthy Living Campus Project Pillars of health, livability, and community.

BCHD initially entered into negotiations with MarVentures/Continental, whose plan included a new Silverado facility. As negotiations progressed, that plan became increasingly complex. At the same time, Sunrise Development Inc. (Sunrise) submitted a revised proposal with strong community benefits, including memory care.

The Advisory working group reconvened on March 11, 2026, and reviewed a side-by-side comparison and financial analysis of the proposals received from Sunrise and Mar Ventures / Continental Development. The Advisory Group also reviewed the revised conceptual site plans. Following the review, the Group unanimously concluded that the Sunrise updated site plan and financial proposal best aligns with BCHD's mission and evaluation criteria and should be ranked first.

At their April 22, 2026, Board meeting, the Board of Directors received an update from the CEO about entering into a Letter of Intent with Sunrise. At the May 27, 2026 Board Meeting, the Board concluded its review of responses to the RFEOI and entered into an Agreement to Enter into the Ground Lease with Sunrise Development, Inc. for the development of the proposed Sunrise Senior Living Facility (revised Project), described in further detail below.

5 Description of the Revised Project:

The selected proposal from Sunrise would include the development of a Residential Care Facility for the Elderly consisting of Assisted Living units and Memory Care units, totaling not more than 217 units, together with a community commons space, a community multi-use room and a pool (collectively a senior living community). The facility would be no more than 279,000 sf with a maximum height of five stories. As a result, the Sunrise Senior Living Project would have a Floor Area Ratio (FAR) equal to or less than 1.25 (see Table 1).

Table 1. Floor Area Ratio Comparing the Revised Project to the Existing BCHD Campus

Sunrise Land Area	223,566 sf
Sunrise Building Area	279,000 sf
Maximum FAR	**1.248**
Existing Campus Land Area	401,339 sf
Existing Building Area	98,662 sf
Sunrise Building Area	279,000 sf
Total Building Area	337,662 sf
Maximum FAR	**0.94**

Community benefits associated with the Sunrise Senior Living Project are planned to include:

- Partnership with allcove Program and Other Youth Organizations;
- Outdoor Space (Wellness Path, etc.);
- Aquatic Classes for Seniors;
- Community Multi-Use Room;
- Exercise and Wellness Programs; and
- Community Events for Seniors.

5.1 Construction

The first phase of construction would focus on hazardous material abatement within the existing Beach Cities Health Center and its associated central mechanical plant, followed by demolition of the existing structures. Upon completion of site preparation, construction of the new senior living community facility would commence. The facility would be delivered in a single phase, with Assisted Living and Memory Care components opening concurrently. The structure is expected to be concrete on standard spread footings. Once the structural frame is complete, the building envelope would be installed, likely incorporating a combination of windows, masonry or stone, and other exterior cladding. Following establishment of a weather-tight building, interior construction would proceed, including mechanical, electrical, plumbing, and finishes. The final stage would consist of inspections and approvals, culminating in California licensing and resident occupancy.

Construction access would involve using the existing intersections to ensure safe and controlled movement of construction vehicles. All access and haul routes would comply with the mitigation measures outlined in the EIR, including traffic management protocols, noise and dust control, and restrictions on delivery hours.

Key strategies to minimize disruption to the adjacent medical office buildings and their associated parking facilities would include:

- **Traffic Management:** Construction traffic would be routed to the north and the south entrances as much as possible to minimize impacts to Building 510, Building 520, and the existing parking garage.
- **Parking Controls:** Construction-related parking would not be permitted in the existing parking garages or in surface spaces serving Building 510 and Building 520, preserving availability for patients, staff, and visitors.
- **Vibration Monitoring and Compliance:** Sunrise would review any medical equipment used within Building 510 and Building 520 to assess potential sensitivity to construction-related vibrations. Monitoring would be conducted as needed, to prevent disruption to medical operations.
- **Dust and Air Quality Control:** During earth-moving and grading activities, enhanced dust suppression measures would be implemented to protect adjacent buildings and minimize impacts on staff and patients.

These measures would help ensure continuity of operations for the medical office buildings while maintaining safety, regulatory compliance, and minimal inconvenience to patients, staff, and visitors.

5.2 Schedule

The conceptual construction schedule has been estimated as follows:

- Q3 2028: Begin site preparation and carry out demolition activities.
- Q4 2028 – Q3 2030: Full construction period with phased delivery of units and amenities.
- Q4 2030: Project opening and commencement of operations.

6 Revised Project: Summary of Proposed Changes to the Approved Project:

The revised Project is planned to consist of the following changes:

- Demolition of the Beach Cities Health Center, consistent with what was evaluated in the EIR. But the existing buildings would be demolished first, prior to any development. This would allow for the construction of the senior living community facility in a more central location within the BCHD campus.
- Elimination of the 6,270-sf Community Services Space, which will remain in its existing configuration at the BCHD Administrative Office.
- Elimination of the 37,150-sf Wellness Pavillion.
- Elimination of the 31,300-sf Aquatics Center and replacement with the development of a lap pool.
- The total development footprint would be reduced by approximately 13,150 sf for a total of 279,000 sf building.
- Maximum building height reduced from 6 stories to 5 stories. The proposed five-story senior living community facility would remain below the height limit described in MM VIS-1.
- Previously adopted Mitigation Measures HAZ-3, NOI-3b, NOI-3c, and T-3 would no longer be needed.

Table 2. Comparison of the Approved Project and the Revised Project

	Approved Project	**Revised Project**
Phases of Development	Two Phases	One Phase
Square Feet	292,150	279,000
Height	6 stories	5 stories
Units	217	217
Construction Duration	29 months (Phase 1) 28 months (Phase 2)	27 months
Changes in Mitigation Measures		MMs HAZ-3, NOI-3b, NOI-3c, and T-3 are no longer required and will be deleted from the MMRP. Revised wording in some of the remaining MMs as needed.

It should be noted that the certified EIR previously considered and rejected an alternative to the approved Project (*Demolish the Beach Cities Health Center and Redevelop within the Center of*

the BCHD Campus). This alternative was initially rejected because the site plan layout would have restricted the size and utility of the proposed open space. Further, the construction timeline associated with the site plan layout could have resulted in up to 6 months of additional construction activities, as compared to the 29 months for Phase 1 of the approved Project. Finally, BCHD would have been required to terminate leases with the current tenants at the Beach Cities Health Center, which was determined make the alternative finically infeasible.

Given the reduction in the overall scope and size of the revised Project, the demolition and construction activities associated with the proposed Sunrise Senior Living Project would not impact the overall site plan. Further, the construction activities would occur over a 2-year period (refer to Section 5.2, *Schedule*), which is a reduction of approximately 2 months in the total construction schedule as compared to Phase 1 of the approved Project. Finally, given the time lapse between the original approval in November 2021, the termination of leases with the current tenants at the Beach Cities Health Center would no longer result in financial infeasibility.

7 Environmental Issue Areas Determined to Have New or Substantially More Severe Environmental Effects Compared to Those Identified in the Previous EIR:

The subject areas checked below were determined to be new significant environmental effects or to be previously identified effects that have a substantial increase in severity either due to a change in the approved Project, change in circumstances, or new information of substantial importance, as indicated by the Environmental Review Checklist and discussion on the following pages (Section 7).

☑ None

☐ Aesthetics and Visual Resources	☐ Agricultural Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural and Tribal Cultural Resources	☐ Energy
☐ Geology and Soils	☐ Greenhouse Gas Emissions	☐ Hazards and Hazardous Materials
☐ Hydrology and Water Quality	☐ Land Use and Planning	☐ Mineral Resources
☐ Noise and Vibration	☐ Population and Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Utilities and Service Systems
☐ Wildfire		

DETERMINATION:
On the basis of this analysis, BCHD, as the lead agency, has determined that:

☑ No substantial changes are proposed in the project and there are no substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previously certified EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no "new information of substantial importance" as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, the previously adopted EIR is adequate with this ADDENDUM.

☐ Substantial changes are proposed in the project or there are substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previously certified EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects; or there is "new information of substantial importance," as that term is used in CEQA Guidelines Section 15162(a)(3). However, all new significant environmental effects or a substantial increase in severity of previously identified significant effects are clearly avoidable through the incorporation of mitigation measures agreed to by the project applicant. Therefore, a subsequent EIR is required.

☐ Substantial changes are proposed in the project or there are substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previously certified EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects; or, there is "new information of substantial importance," as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, a subsequent or supplemental EIR is required.

T F. Bg
Signature

10/29/2026
Date

Thomas B. Bakaly
Printed Name

CEO
Title

8 ENVIRONMENTAL REVIEW CHECKLIST

The following responses detail any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that may cause one or more effects to environmental resources. The responses support the “Determination” above, as to the type of environmental documentation required, if any.

I. AESTHETICS AND VISUAL RESOURCES – Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to aesthetic resources including: scenic vistas; scenic resources including, but not limited to, trees, rock outcroppings, or historic buildings within a state scenic highway; existing visual character or quality of the site and its surroundings; or day or nighttime views in the area?

Yes	No
☐	☒

The EIR described that there are no officially designated scenic vistas, corridors, or viewsheds in Redondo Beach or near the Project site. However, a well-traveled intersection and topographical high point at 190th Street and Flagler Lane offers an expansive view of the Palos Verdes hills. From this location, the EIR found that previously proposed Residential Care for the Elderly (RCFE) building would obstruct the ridgeline causing a potentially significant visual impact and requiring mitigation to reduce the building’s effective height (MM VIS-1). Aside from this issue, the EIR concluded that changes in visual character from the approved Project would not constitute a significant impact because it would not conflict with applicable zoning or policies related to scenic quality. The analysis of light and glare determined that compliance with City standards and project design features – including low- or no-glare building materials and controlled lighting – would prevent adverse effects on surrounding uses, resulting in less than significant impacts. Finally, although shade and shadow are not CEQA Appendix G issue areas, the EIR evaluated shadow conditions and found that while winter solstice shadows would shift and slightly extend in limited areas due to the RCFE building, off-site shading would occur only during late afternoon hours and for a limited duration, making the impact less than significant.

The revised Project would include the demolition of the Beach Cities Health Center consistent with what was evaluated in the EIR. However, the Beach Cities Health Center would be demolished first in the construction sequence, prior to any new development. This would allow for the construction of the senior living community facility in a more central location within the BCHD campus, thereby making it less prominent when viewed from the residential areas to the east. Further, the proposed five-story senior living community facility would remain below the height limit described in MM VIS-1. As described for the approved Project, the revised Project, which would be more centrally located and reduced in size, would not conflict with applicable zoning or policies related to scenic quality. Impacts to aesthetics and visual resources would remain less than significant with the implementation of mitigation measures.

Mitigation Measures
The following mitigation measures, which were adopted and incorporated into the approved Project, have been adapted and would be implemented as a part of the revised Project to mitigate potential adverse impacts to aesthetics and visual resources to a less than significant level:

MM VIS-1 Reduced Residential Care for the Elderly (RCFE) Building Height. The final design of the Project shall avoid interruption of the ridgeline of the Palos Verdes hills as viewed from the intersection of 190th Street & Flagler Lane. The final design could include a reduction in the floor-to-ceiling height, removal of the uppermost stories of the building, and/or recessing the building foundation further into the ground surface. The building height shall be formalized on all final building plans and construction plans, as appropriate, prior to the issuance of any demolition, grading, or building permits by the Redondo Beach Building & Safety Division. City of Redondo Beach permit compliance staff shall observe and ensure compliance with these specifications during construction activities associated with the Project.

As previously described, the proposed five-story senior living community facility would remain below the height limit described in MM VIS-1. At a height of no more 82.75 feet above existing ground level, the proposed building would not extend beyond the ridgeline of the Palos Verdes hills from 190th Street and Flagler Lane. Therefore, the wide-ranging panoramic views of the Palos Verdes ridgeline from Representative View 6 would remain uninterrupted, and this visual impact would be *less than significant*.

II. AGRICULTURE AND FORESTRY RESOURCES -- Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to agriculture or forestry resources including: conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use, conflicts with existing zoning for agricultural use or Williamson Act contract, or conversion of forest land (as defined in Public Resources Code section 12220[g]), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104[g])?

Yes	No
☐	☒

The EIR identifies no impacts to agricultural and forestry resources. The BCHD campus is completely developed/paved and does not include any such resources. The revised Project would not result in the conversion of prime farmland, unique farmland, or farmland of statewide importance to non-agricultural use.

III. AIR QUALITY -- Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to air quality including: conflicts with or obstruction of implementation of the applicable air quality plan or applicable portions of the State Implementation Plan (SIP); violation of any air quality standard or substantial contribution to an existing or projected air quality violation; a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard; exposure of sensitive receptors to substantial pollutant concentrations; or creation of objectionable odors affecting a substantial number of people?

Yes	No
☐	☒

The EIR concluded that potential conflicts with the South Coast Air Quality Management District's (SCAQMD's) Air Quality Management Plan, construction-related criteria air pollutant and diesel particulate matter emissions, and associated health risks would be reduced to below established significance thresholds through implementation of mitigation requiring the preparation of an Air Quality Management Plan requiring soil stabilization and the use of U.S. Environmental Protection Agency (USEPA) Tier 4 construction equipment (MM AQ-1). The EIR further determined that operational emissions of criteria pollutants, including carbon monoxide (CO), would not exceed SCAQMD thresholds, would not create localized CO hotspots at nearby intersections, and would not generate substantial odors beyond existing conditions. As a result, both construction and operational air quality impacts were determined to be less than significant.

The revised Project would include the demolition of the Beach Cities Health Center consistent with what was evaluated in the EIR. However, the Beach Cities Health Center would be demolished first in the construction sequence, prior to any development. This would eliminate an on-site sensitive receptor during construction activities, as Silverado would have remained in place during construction of the RCFE Building under the approved Project. This would also allow for the construction of the senior living community facility in a more central location within the BCHD campus, thereby increasing the distance between the proposed development and nearby sensitive receptors and reducing construction-related edge effects related to criteria air pollutant emissions as compared to those described in the EIR. Given the reduced size of the revised Project and the reduced construction duration, with the implementation of MM AQ-1, the revised Project would result in a reduction in criteria air pollutant emissions. Further, given the reduced scope of development as compared to the approved Project, the revised Project would result in a minor decrease in operational emissions. Overall, the severity of air quality impacts identified in the EIR would be reduced and would remain less than significant with the implementation of mitigation measures.

Mitigation Measures

The following mitigation measures, which were adopted and incorporated into the approved Project, have been adapted and would be implemented as a part of the revised Project to mitigate potential adverse impacts to air quality to a less than significant level:

MM AQ-1 Air Quality Management Plan. BCHD shall prepare an Air Quality Management Plan for construction of the Project, which shall be approved by the City of Redondo Beach prior to issuance of demolition, grading, or building permits. The plan shall include the following conditions for construction:

- Construction equipment engines shall be maintained in good condition and in proper tune per manufacturer's specification for the duration of construction.
- All construction activities that are capable of generating fugitive dust are required to implement dust control measures during each phase of construction to reduce the amount of particulate matter entrained in the ambient air. These measures include the following:
    - Quick replacement of ground cover in disturbed areas.
    - Watering of exposed surfaces three times daily.
    - Watering of all unpaved haul roads three times daily.
    - Covering all stock piles with tarp.

    - Post signs on-site limiting traffic to 15 miles per hour (mph) or less on unpaved roads.
    - Prohibit demolition when wind speed is greater than 25 mph.
    - Sweep streets adjacent to the Project site at the end of the day if visible soil material is carried over to adjacent roads.
    - Cover or have water applied to the exposed surface of all trucks hauling dirt, sand, soil, or other loose materials prior to leaving the site to prevent dust from impacting the surrounding areas.
    - Install wheel washers where vehicles enter and exit unpaved roads onto paved roads to wash off trucks and any equipment leaving the site each trip.
- Construction activities associated with the Project shall use USEPA Tier 4 engines on all construction equipment, except crushing equipment, which would reduce diesel particulate matter (DPM) emissions from combustion.
- Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, shall be turned off when not in use for more than 5 minutes.

Construction contractors shall ensure that all off-road equipment (except crushing equipment) meet the standards prior to deployment at the Project site and BCHD shall demonstrate compliance with these measures to the City of Redondo Beach prior to the start of construction. The City of Redondo Beach shall monitor for continual compliance with these requirements throughout the course of construction.

IV. BIOLOGICAL RESOURCES -- Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to biological resources including: adverse effects on any sensitive natural community (including riparian habitat) or species identified as a candidate, sensitive, or special status species in a local or regional plan, policy, or regulation, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service (USFWS); adverse effects to federally protected wetlands as defined by Section 404 of the Clean Water Act (CWA); interference with the movement of any native resident or migratory fish or wildlife species or with wildlife corridors, or impeding the use of native wildlife nursery sites; and/or conflicts with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional or state habitat conservation plan, policies or ordinances?

Yes	No
☐	☒

The EIR found that biological resources on the Project site are limited because the campus is already developed and lacks significant native vegetation. Mature perimeter trees could provide potential nesting or roosting habitat for birds and construction activities associated with the approved Project could potentially affect nesting birds through tree removal or construction disturbance. However, potential impacts to nesting birds would be avoided through implementation of standard mitigation requiring pre-construction nesting bird surveys and avoidance measures (MM BIO-1).

The revised Project would include the demolition of the Beach Cities Health Center consistent with what was evaluated in the EIR. However, the Beach Cities Health Center would be demolished first in the construction sequence, prior to any new development. This would allow for

the construction of the senior living community facility in a more central location within the BCHD campus, further away from the existing mature trees along the edge of the campus. As described further below in Section XIII, *NOISE AND VIBRATION*, the location, reduced scale, and reduced duration of construction activities would reduce construction-related related noise impacts. Therefore, potential construction-related impacts on nesting birds and other urban wildlife would similarly be reduced. With the implementation of MM BIO-1, impacts to nesting birds as a result of the revised Project would remain less than significant.

Mitigation Measures
The following mitigation measures, which were adopted and incorporated into the approved Project, have been adapted and would be implemented as a part of the revised Project to mitigate potential adverse impacts to biological resources to a less than significant level:

MM BIO-1 Pre-Construction Nesting Bird Surveys. To prevent impacts to nesting or roosting birds through loss or damage of mature trees, the Beach Cities Health District (BCHD) shall comply with the following:

- Where suitable vegetation and structures for nesting birds occur within 500 feet of construction activities, all phases of construction shall avoid the general nesting season (i.e., between February 15 and August 31) to the maximum extent practicable.
- If the nesting season cannot be avoided, a qualified biologist shall be retained to conduct a pre-construction survey for nesting birds. The survey shall be conducted within 72 hours prior to commencement of vegetation removal.
- If any nesting birds are present within or immediately adjacent to the construction area, the following shall be required: A qualified biologist shall be retained by BCHD to flag and demarcate the location of all nesting birds and monitor construction activities. Temporary avoidance of active nests, including the enforcement of an avoidance buffer determined by the qualified biological monitor, shall be required until the qualified biological monitor has verified that the young have fledged or the nest has otherwise become inactive.
- If Federal or State protected species are observed during the site survey, consultation shall be completed with the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW) to determine if work shall commence or proceed during the breeding season; and, if work may proceed, what specific measures shall be taken to ensure protected bird species are not affected.

V. CULTURAL RESOURCES AND TRIBAL CULTURAL RESOURCES -- Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to cultural resources or tribal cultural resources including: causing a change in the significance of a historical or archaeological resource as defined in CEQA Guidelines Section 15064.5; disturbing any human remains, including those interred outside of formal cemeteries?

Yes	No
☐	☒

The EIR identified four historically significant properties in the vicinity of the Project site and determined that the physical features contributing to their historical integrity would remain unaffected by the approved Project. The EIR found no known archaeological or tribal cultural resources on the Project site. However, due to documented Native American presence in the

South Bay and the possibility of buried resources despite prior site grading, the EIR acknowledges the potential for inadvertent discovery during construction. To address this, the EIR includes mitigation measures (MM CUL-1a and -1b as well as MM CUL-2) that would ensure any cultural, tribal cultural resources, or human remains encountered during ground disturbance are avoided or fully mitigated, resulting in less-than-significant impacts.

As with the approved Project, the revised Project would include demolition and construction activities within the BCHD campus that was evaluated in the EIR. The overall massing of the revised Project would be less than that of the approved Project and, therefore, would not affect the existing historically significant properties in the vicinity of the Project site. Further, the construction footprint associated with the proposed Sunrise Senior Living Project would be smaller than that of the approved Project, which would negligibly reduce the potential for unanticipated discoveries. With the implementation of MM CUL-1a and -1b as well as MM CUL-2, impacts would remain less than significant.

Mitigation Measures

The following mitigation measures, which were adopted and incorporated into the approved Project, have been adapted and would be implemented as a part of the revised Project to mitigate potential adverse impacts to cultural resources and tribal cultural resources to a less than significant level:

MM CUL-1a Native American Monitoring. Prior to the commencement of any ground disturbing activities at the Project site, the Beach Cities Health District (BCHD) shall retain a Native American Monitor approved by the Gabrieleño Band of Mission Indians-Kizh Nation. The Native American Monitor shall only be present on-site during the construction phases that involve ground-disturbing activities, defined as activities that may include, but are not limited to, pavement removal, potholing or auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching, within the Project site. The Native American Monitor shall complete daily monitoring logs that provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when all ground-disturbing activities on the Project site are completed, or when the Native American Monitor and Tribal Representatives have indicated that all upcoming ground-disturbing activities at the Project site have little to no potential for impacting Tribal Cultural Resources.

Upon discovery of any Tribal Cultural Resources, construction activities shall cease in the immediate vicinity of the find (i.e., not less than the surrounding 100 feet) until the find can be assessed. All archaeological resources unearthed by ground disturbing activities shall be evaluated by the Native American Monitor. If the archaeological resources are Native American in origin, the Consulting Tribe shall retain it/them in the form and/or manner the Tribe deems appropriate, for educational, cultural and/or historic purposes.

If human remains and/or grave goods are discovered or recognized at the Project site, all ground disturbance shall immediately cease, and the County coroner shall be notified per Public Resources Code Section 5097.98, and Health & Safety Code (H&SC) Section 7050.5. Human remains and grave/burial goods shall be treated alike per Public Resources Code section 5097.98(d)(1) and (2). Work may continue on other parts of the Project site while evaluation and, if necessary, mitigation takes place (California Environmental Quality Act [CEQA] Guidelines Section 15064.5[f]).

MM CUL-1b Archaeological Monitoring. Prior to issuance of a demolition or excavation/grading permit, a Cultural Resources Monitoring Plan shall be developed by a qualified archaeologist. The Cultural Resources Monitoring Plan shall identify those specific locations on the Project site where a qualified archaeologist shall be required during ground disturbing activities during the construction activities. The rate of excavation, the types of activities, their proximity to known archaeological resources, the provenance and character of materials being excavated (e.g., non-cultural fill, younger alluvium, or older alluvium), the depth of excavation, and if found, the abundance and type of prehistoric archaeological or tribal resources encountered, will determine the frequency of monitoring in these areas. Full-time field observation shall be reduced to part-time inspections or ceased entirely if determined appropriate by the qualified archaeologist. The Cultural Resources Monitoring Plan shall also include a Treatment Plan that sets forth explicit criteria for appropriately mitigating impacts to archaeological resources that may be eligible for the California Register of Historic Resources (CRHR), human remains, and/or burial goods or other significant tribal resources inadvertently discovered during ground disturbing activities. The Treatment Plan shall also include requirements for a final technical report on all cultural resource studies and requirements for curation of artifacts and other recovered remains, including appropriate treatment of tribal resources, as necessary.

MM CUL-2 Inadvertent Discoveries. A qualified archaeologist shall be retained for the duration of ground-disturbing activities. In the event of any inadvertent discovery of prehistoric or historic-period archaeological resources during construction, ground-disturbing activities in the immediate vicinity of the discovery shall stop. Construction activities shall temporarily be redirected to areas located more than 100 feet from the find. The treatment of the archaeological resources shall be in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) shall be the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.

VI. ENERGY -- Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to energy resources including: resulting in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Yes	No
☐	☒

The EIR identified no impacts to energy resources due to the limited scale of the approved Project and consumption of energy resources during construction and operation. The revised Project would be smaller than the approved Project and therefore would result in a comparative reduction

in the consumption of energy resources during construction and operation. Implementation of the revised Project would not create wasteful, inefficient, or unnecessary consumption of energy resources. Further, the revised Project would not conflict with State or local plans for renewable energy or energy efficiency.

VII. GEOLOGY AND SOILS -- Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects from geology and soils including: exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, seismic-related ground failure, including liquefaction, strong seismic ground shaking, or landslides; result in substantial soil erosion or the loss of topsoil; be located on geologic unit or soil that is potentially resulting in adverse impacts resulting from landslides, lateral spreading, subsidence, liquefaction or collapse; be located on expansive soil creating substantial risks to life or property; have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater; directly or indirectly destroy an unique paleontological resource or site or unique geologic feature?

Yes	No
☐	☒

The EIR found that the approved Project would not result in significant geologic hazards and would instead provide a substantial public safety benefit. The analysis found that risks associated with liquefaction, landslides, slope instability, subsidence, soil expansion, and tsunamis are absent or very low at the Project site, and that regional seismic hazards affecting all structures would be addressed through compliance with current California Building Code standards and geotechnical recommendations (MM GEO-1). Importantly, the EIR identified the existing former South Bay Hospital building as a significant seismic hazard due to its age and obsolete design standards, and determined that its removal and replacement with new buildings meeting modern seismic requirements would result in a significant beneficial impact. The EIR also found a low likelihood of encountering significant paleontological resources and concludes that any potential impacts would be avoided or fully mitigated through worker training and discovery protocols required by MM GEO-2a and MM GEO-2b, resulting in less than significant impacts.

The revised Project would include the demolition of the Beach Cities Health Center consistent with what was evaluated in the EIR. The removal of this building would address a significant seismic hazard thereby resulting in a significant beneficial impact. As with the approved Project, the revised Project would include demolition and construction activities within the BCHD campus that was evaluated in the EIR. With the implementation of MM GEO-1 risks associated with a fault zone, strong seismic ground shaking, ground failure, liquefaction, unstable soils, landsides, lateral spreading, subsidence, collapse, or expansive soils would be remain less than significant. Similarly, with the implementation of MM GEO-2a and MM GEO-2b potential impacts to paleontological resources would be less than significant.

Mitigation Measures

The following mitigation measures, which were adopted and incorporated into the approved Project, have been adapted and would be implemented as a part of the revised Project to mitigate potential adverse impacts to geology and soils to a less than significant level:

MM GEO-1 Geotechnical Report Recommendations. The Project shall comply with all earthwork and site grading, design, and construction recommendations provided in the Geotechnical Report prepared for the Project. The Beach Cities Health District (BCHD) shall incorporate these recommendations into all final grading plans, design drawings, and construction plans, as appropriate, prior to the issuance of any demolition or grading permits and shall submit the appropriate plans to the City of Redondo Beach Building & Safety Division prior to the issuance of any demolition or grading permits. City of Redondo Beach permit compliance staff shall review all final grading plans, design drawings, and construction plans, as appropriate, and observe earthwork and grading to ensure compliance with these recommendations and specifications.

MM GEO-2a Worker Paleontological Resource Awareness Session. In order to educate construction contractors regarding the protection of any paleontological resources that are unexpectedly discovered during excavations associated with the Project, the Beach Cities Health District (BCHD) shall retain a qualified paleontologist to develop a worker awareness program to educate all workers regarding the paleontological resources that, while unlikely, may occur on the development site as well as appropriate procedures to enact should paleontological resources be discovered during development. The qualified paleontologist shall develop appropriate training materials including, but not limited to, a summary of geologic units present at the Project site by depth, a description of potential paleontological resources that may be encountered during the proposed excavations, and worker attendance sheets to record workers' completions of the awareness session. The worker awareness session for paleontological resources shall occur prior to the initiation of excavation and grading activities or prior to the start of work on-site for new workers hired after the initial awareness session. BCHD shall provide awareness session sign-in sheets documenting employee attendance to the City of Redondo Beach permit compliance staff, if requested.

MM GEO-2b Paleontological Resources Inadvertently Discovered During Ground-Disturbing Activities. In the unlikely event that any potentially significant paleontological resources are uncovered during ground disturbance or construction activities the following actions would be implemented by the construction contractor to prevent potential significant impacts on paleontological resources:

- Temporarily cease grading in the vicinity of the find and redirect activity elsewhere to ensure the preservation of the resource and surrounding rock in which the discovery was made.
- Immediately notify the City of Redondo Beach regarding the resource and redirected ground-disturbing activity.
- Obtain the services of a qualified professional paleontologist who shall assess the significance of the find and provide recommendations, as necessary, for its proper disposition.
- Complete all significance assessment and mitigation of impacts to the paleontological resource prior to resuming ground-disturbing activities in the area of the find.

VIII. GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE -- Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects related to environmental effects associated with greenhouse gas (GHG) emissions or compliance with applicable plans, policies or regulations adopted for the purpose of reducing GHG emissions?

Yes	No
☐	☒

The EIR concluded that the approved Project would not generate GHG emissions, either directly or indirectly, to an extent that would have significant impacts on the environment; nor would the approved Project significantly conflict with an applicable plan, policy, or regulation.

The revised Project would include the demolition of the Beach Cities Health Center consistent with what was evaluated in the EIR. Given the reduced size of the revised Project and the reduced construction duration, the revised Project would result in a reduction in GHG emissions. Further, given the reduced scope of development, the revised Project would result in a minor decrease in operational GHG emissions.

IX. HAZARDS AND HAZARDOUS MATERIALS -- Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects from hazards and hazardous materials including: creation of a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes; creation of a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; production of hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school; location on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 creating a hazard to the public or the environment; location within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport; within the vicinity of a private airstrip resulting in a safety hazard for people residing or working in the project area; impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and/or exposure of people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Yes	No
☐	☒

The EIR concluded that the approved Project could disturb hazardous materials identified through Phase I and Phase II Environmental Site Assessments (ESAs), including asbestos, lead-based paint, polychlorinated biphenyls (PCBs), and mold in buildings slated for demolition, an abandoned and plugged oil well on the Flagler Lot, and soil contamination from tetrachloroethylene (PCE) associated with a neighboring former dry cleaner. However, with implementation of mitigation measures tied to regulatory oversight and agency approvals (MM HAZ-1 as well as MM HAZ-2a through -2d), the EIR found that hazards and hazardous materials impacts would be reduced to less than significant levels.

The revised Project would include demolition and construction activities within the BCHD campus that was evaluated in the EIR. With the implementation of MM HAZ-1 as well as MM HAZ-2a through -2d, hazards and hazardous materials impacts would be reduced to less than significant levels. It should be noted that the revised Project would not affect the Flagler Lot; therefore, the

revised Project would not require enrollment in the California Geologic Energy Management Division's (CalGEM's) Well Review Program and MM HAZ-3 would no longer be required.

Mitigation Measures
The following mitigation measures, which were adopted and incorporated into the approved Project, have been adapted and would be implemented as a part of the revised Project to mitigate potential adverse impacts to hazards and hazardous materials to a less than significant level:

MM HAZ-1 Asbestos-Containing Material (ACM), Lead-Based Paint (LBP), polychlorinated biphenyls (PCBs), and Mold Surveys. Prior to the issuance of a demolition permit by the Redondo Beach Building & Safety Division, Beach Cities Health District (BCHD) shall retain a licensed contractor to conduct a comprehensive survey of ACM, LBP, PCBs, and mold, including invasive physical testing within the buildings proposed for demolition including the Beach Cities Health Center. If such hazardous materials are found to be present, BCHD and the licensed contractor shall follow all applicable Federal, State, and local codes and regulations (e.g., Rule 1403, Asbestos Emissions from Renovation/Demolition Activities), as well as applicable best management practices (BMPs), related to the treatment, handling, and disposal of ACM, LBP, PCBs, and molds to ensure public safety. This generally includes sealing off an area with plastic and filtering air to ensure that hazardous building materials are not let out into the surrounding environment. During construction the licensed contractor shall conduct additional surveys as new areas (e.g., interior portions) of the buildings become exposed.

MM HAZ-2a Soils Management Plan. Prior to approval of issuance of demolition, grading, or building permit by the Redondo Beach Building & Safety Division and/or approval of a grading plan by the City of Redondo Beach Building & Safety Division, Beach Cities Health District (BCHD) shall prepare and submit a Soils Management Plan and a Transportation Plan to the Los Angeles County Fire Department (LACoFD) Health Hazardous Materials Division and Los Angeles Regional Water Quality Control Board (RWQCB) as well as the City of Redondo Beach, for review. The Soils Management Plan and Transportation Plan shall include, but shall not be limited to the following:

<u>Soils Management Plan</u>

Affected soils shall be either directly loaded into awaiting trucks for immediate off-site disposal or temporarily stockpiled on plastic sheeting prior to load-out and off-site disposal. If temporarily stockpiled, soil removed from the excavations shall be placed next to or as close as possible to the excavation from which it came.

Prior to load-out, the construction contractor shall prepare waste profiles and example waste manifests for approval by the receiving facilities. Soil and material segregation, stockpile handling, truck loading, and storm water management practices shall be followed during the remedial action according to the following:

<u>Soil and Material Segregation</u>

Overburden soils shall be screened with an Organic Vapor Analyzer (OVA) in accordance with South Coast Air Quality Management District (SCAQMD) Rule 1166. Any significant quantities of construction debris encountered during excavation shall be segregated and disposed of in accordance with Federal, State, and local regulations. Soil cuttings during the excavation and

installation of soldier piles shall be disposed of off-site with any affected soils from the deep excavation.

Stockpile Management

The stockpiled soils for load-out shall be segregated by waste classification:

- Non-hazardous waste.
- Volatile organic compound (VOC)-contaminated non-hazardous waste with OVA readings greater than 50 parts per million (ppm) but less than 1,000 ppm.
- VOC-contaminated non-hazardous waste with OVA readings of 1,000 ppm or greater. These soils shall be immediately sprayed with water or suppressant and placed in a sealed container (roll-off bin) or directly loaded into a suitable transport truck, moistened with water, and covered with a tarp for off-site transportation to the appropriate disposal facility, as specified in the SCAQMD Rule 1166 Mitigation Plan.

The temporary stockpiles containing affected soils shall be managed as follows:

- The temporary stockpiles for non-VOC contaminants shall be placed on plastic sheeting and kept moist during working hours and covered with plastic sheeting at the end of the day to control dust.
- The VOC-contaminated stockpiles shall be placed on plastic sheeting and immediately covered with plastic sheeting. The edges of the plastic shall have an overlap of at least 24 inches. The plastic shall be secured at the base of the stockpile and along the seams of overlapping plastic sheeting with sandbags or equivalent means. The stockpiles shall remain covered until load-out.
- Daily inspections of the stockpiles shall be conducted to verify the integrity of the stockpile covers. Any gaps, tears, or other deficiencies shall be corrected immediately. Daily records shall be kept of stockpile inspections and any repairs made.
- If necessary, commercial vapor suppressants and sealants shall be prepared and applied to VOC-contaminated soil in accordance with the manufacturer's recommendations.
- During stockpile generation and removal, only the working face of the stockpile shall be uncovered.

Decontamination Methods and Procedures

Each piece of equipment used for the excavation of affected soils shall have a clean-out bucket or continuous edge across the cutting face of its bucket. No excavation of affected soil shall be permitted with equipment utilizing teeth across the cutting edge of its bucket.

Entry to the contaminated areas (i.e., work exclusion zones) shall be limited to avoid unnecessary exposure and related transfer of contaminants. In unavoidable circumstances, any equipment or truck(s) that come into direct contact with affected soil shall be decontaminated to prevent the on- and off-site distribution of contaminated soil. The decontamination shall be conducted within a designated area by brushing off equipment surfaces onto plastic sheeting. Trucks shall be visually inspected before leaving the site, and any dirt adhering to the exterior surfaces shall be brushed off and collected on plastic sheeting. The storage bins or beds of the trucks shall be inspected to ensure the loads are properly covered and secured. Excavation equipment surfaces shall also be brushed off prior to removing the equipment from contaminated areas.

Movement of affected soils from the excavation area to temporary stockpiles shall be conducted using enclosed transfer trucks, if possible. If affected soils must be moved within an open receptacle (e.g., loader bucket), the travel path for the loader shall be scraped following this activity, with scraped soils placed in the temporary stockpile for load-out.

Sampling equipment that comes into direct contact with potentially contaminated soil or water shall be decontaminated to assure the quality of samples collected and/or to avoid cross-contamination. Disposable sampling equipment intended for one-time use shall not be decontaminated, but shall be packaged for appropriate off-site disposal. Decontamination shall occur prior to and after each designated use of a piece of sampling equipment, using the following procedures:

- Non-phosphate detergent and tap-water wash, using a brush if necessary.
- Tap-water rinse.
- Initial deionized/distilled water rinse.
- Final deionized/distilled water rinse.

Truck Loading

Trucks may be loaded directly from the excavation or temporary stockpile based on truck availability and excavation logistics. Trucks shall be routed, and stockpile areas shall be located so as to avoid having trucks pass through impacted areas. The truckloads shall be wetted and tarped prior to exiting the site. All soil hauled from the site shall comply with the following:

- Materials shall be transported to an approved treatment/disposal facility.
- No excavated material shall extend above the sides or rear of the truck/trailer.
- Trucks/trailers carrying affected soils shall be completely tarped/covered to prevent particulate emissions to the atmosphere. Prior to covering/tarping, the surface of the loaded soil shall be moistened.
- The exterior of the trucks/trailers shall be cleaned off prior to leaving the site to eliminate tracking of material off-site.

Storm Water Management

General construction best management practices (BMPs) identified by the Los Angeles RWQCB shall be implemented during soil excavation activities to contain and control storm water runoff that might convey contaminated or excessive sediments. If rainfall is expected, the areas around open excavations shall be graded and bermed to prevent storm water from flowing into the excavation. Any standing water that collects in the bottom of the excavations shall be removed and handled in accordance with Federal, State, and local regulations. The water shall be sampled and analyzed either as standing water in the excavation or following containment in a temporary above-ground storage tank. Depending on the volume of water and the sampling results, options for handling the standing water could include:

- Pumping the standing water into temporary aboveground storage tanks for reuse on-site for dust suppression.
- Pumping the standing water through filters and a carbon adsorption filter (if required based on analytical results) prior to discharge to a storm drain.

- Pumping the standing water into vacuum trucks for transport and disposal at a recycling facility.

Transportation Plan

All affected soils shall be transported off-site for lawful management and disposal. Prior to load-out, the construction contractor shall prepare waste profiles for the receiving facility using analytical data from the previous environmental site assessment.

MM HAZ-2b Soil Vapor Monitoring. During soil disturbance activities with the potential to disturb tetrachloroethylene (PCE)-contaminated soil, soil vapor monitoring shall be conducted by the construction contractor using a photoionization detector (PID) 10.6 or 11.7 eV lamp. Use of the PID shall ensure that the Occupational Safety and Health Administration (OSHA) exposure limits for PCE and other volatile organic compounds (VOCs) are maintained. In the event that the OSHA exposure limits are exceeded, work within the confined space would be temporarily stopped until the use of a Soil Vapor Extraction (SVE) vacuum blower reduces it to below this limit (see MM HAZ-2c).

MM HAZ-2c Soil Vapor Extraction (SVE) Equipment. Use of an SVE vacuum blower (e.g., regenerative blowers, rotary lobe blowers, rotary claw blowers, centrifugal fan blowers, etc.) shall be implemented during construction within confined spaces, as necessary, to maintain Occupational Safety and Health Administration (OSHA) exposure limits for tetrachloroethylene (PCE) and other volatile organic compounds (VOCs).

MM HAZ-2d Discovery of Contamination. In the event that previously unknown or unidentified soil and/or groundwater contamination that could present a threat to human health or the environment is encountered during construction at a development site, construction activities in the immediate vicinity of the contamination shall cease immediately. A qualified environmental specialist (e.g., a licensed Professional Geologist, a licensed Professional Engineer, or similarly qualified individual) shall conduct an investigation to identify and determine the level of soil and/or groundwater contamination. If contamination is encountered, a Human Health Risk Management Plan shall be prepared and implemented that: 1) identifies the contaminants of concern and the potential risk each contaminant would pose to human health and the environment during construction and post-development; and 2) describes measures to be taken to protect workers, and the public from exposure to potential site hazards. Such measures could include a range of options, including, but not limited to, physical site controls during construction, remediation, long-term monitoring, post-development maintenance or access limitations, or some combination thereof. Depending on the nature of contamination, if any, appropriate agencies shall be notified (e.g., LACoFD and Los Angeles Regional Water Quality Control Board [RWQCB]). If needed, a Site Health and Safety Plan that meets Occupational Safety and Health Administration (OSHA) requirements shall be prepared and in place prior to commencement of work in any contaminated area.

X. HYDROLOGY AND WATER QUALITY -- Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to hydrology and water quality including: violation of any waste discharge requirements; substantially decreases groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin; substantially alter the existing

drainage pattern of the site or area in a manner which would result in substantial erosion, siltation or flooding on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems; impede or redirect flood flows; risk release of pollutants due to project inundation; conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan; place housing or other structures which would impede or redirect flood flows within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map; expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam; and/or inundation by seiche, tsunami, or mudflow?

Yes	No
☐	☒

The EIR concluded that the approved Project would not result in significant impacts to hydrology or water quality. The analysis found that potential construction-related and operational impacts on surface water and groundwater would be avoided through compliance with extensive federal, state, regional, and local regulations implementing the Clean Water Act, which govern erosion control, stormwater management, and protection of water quality. The EIR highlights redevelopment benefits, including a substantial increase in pervious surfaces through more than 114,000 sf of new open space and installation of an on-site infiltration system designed to retain, treat, and infiltrate the 85th percentile 24-hour storm event, thereby reducing runoff and improving groundwater recharge. With adherence to established standards, best management practices, and locally enforced water quality and groundwater management plans, the EIR determined that hydrology and water quality impacts would be less than significant.

Given the reduced scope of the development, the revised Project would result in less development and associated runoff. The drainage plan that would be required as a part of the entitlement process would adhere to established standards, best management practices, and locally enforced water quality and groundwater management plans. Therefore, the impacts to hydrology and water quality impacts would remain less than significant.

XI. LAND USE AND PLANNING -- Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to land use and planning including: physically dividing an established community; and/or conflicts with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect?

Yes	No
☐	☒

The EIR found that the approved Project would not conflict with any adopted land use plans, policies, or regulations intended to avoid or mitigate environmental effects. The analysis considered state, regional, and local policies, including the General Plans and zoning regulations of Redondo Beach.

Similarly, implementation of the revised Project would not physically divide an established community or conflict with any applicable land use plans, policies, or regulations. Therefore, the revised Project would not affect the findings of the EIR as related to land use and planning.

XII. MINERAL RESOURCES -- Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to mineral resources including: the loss of availability of a known mineral resource that would be of value to the region and the residents of the state; and/or loss of locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

Yes	No
☐	☒

The EIR identified no impacts to mineral resources. Similarly, the revised Project, which would be developed on the BCHD campus that was previously evaluated in the EIR, would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state; and/or loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. Therefore, the development would not affect the findings of the EIR as related to agricultural and forestry resources.

XIII. NOISE AND VIBRATION -- Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects from noise including: exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies; exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels; a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project; a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project; for projects located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, or for projects within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Yes	No
☐	☒

The EIR found that the approved Project would result in potentially significant construction-related noise impacts at nearby sensitive receptors, including residences in Torrance and Redondo Beach, due to elevated noise levels from on-site equipment and building construction that exceed Federal Transit Administration (FTA) standards. Conventional mitigation methods, such as noise barriers, are limited in effectiveness for taller structures, and even with the implementation of all feasible measures (e.g., MM NOI-1), construction noise impacts would remain significant. In contrast, construction-related vibration from equipment and haul trucks would not exceed Federal Transit Authority (FTA) criteria and would be less than significant. Post-construction operational noise from on-site activities, deliveries, parking, and emergency vehicles would have the potential to affect sensitive receptors, particularly amplified outdoor events, but feasible mitigation

measures – such as restrictions on delivery hours and engine idling (MM NOI-3a), an Events Management Plan (MM NOI-3b), and restrictions on outdoor pool activities (MM NOI-3c) – would reduce these operational impacts to less than significant. Additionally, the projected increase in emergency medical vehicle trips would be minimal and would not meaningfully elevate ambient noise levels.

The revised Project would include the demolition of the Beach Cities Health Center consistent with what was evaluated in the EIR. However, the Beach Cities Health Center would be demolished first in the construction sequence, prior to any development. This would eliminate on-site sensitive receptors during construction activities, as Silverado would have remained in place during construction of the RCFE Building under the approved Project. This would also allow for the construction of the new senior living community facility in a more central location within the BCHD campus, thereby increasing the distance between the proposed development and nearby sensitive receptors, and reducing construction-related edge effects related to noise. While construction-related noise impacts would likely remain significant and unavoidable, given the reduced size of the revised Project and the reduced construction duration, with the implementation of MM NOI-1, the revised Project would result in a reduction in the intensity and duration of construction-related noise. Further, given the reduced scope of development as compared to the approved Project, the revised Project would result in a minor decrease in operational noise. MM NOI-3b (Events Management Plan) and MM NOI-3c (Outdoor Pool Activities) would no longer be required because the outdoor pool and events are not included in the revised Project. Overall, the severity of noise impacts identified in the EIR would be reduced and with the exception of construction-related noise, would remain less than significant.

Mitigation Measures
The following mitigation measures, which were adopted and incorporated into the approved Project, have been adapted and would be implemented to mitigate potential adverse impacts to noise to the maximum extent practicable:

MM NOI-1 Construction Noise Management Plan. The Beach Cities Health District (BCHD) shall prepare a Construction Noise Management Plan for approval by the Redondo Beach Building & Safety Division. The Construction Noise Management Plan would address noise and vibration impacts and identify measures that would be used to reduce impacts. At a minimum measures would include:

- Construction activities shall be restricted to the hours between 7:30 a.m. and 6:00 p.m., Monday through Friday, or the hours between 9:00 a.m. and 5:00 p.m. on Saturday, in accordance with Redondo Beach Municipal Code (RBMC) Sections 4-24.503.
- BCHD and its contractors and subcontractors shall coordinate approvals with the City of Redondo Beach and construct noise barriers to reduce noise levels to on- and off-site sensitive receptors, where feasible:
    - Noise barriers containing sound-absorbing materials would be constructed to a height that blocks the line-of-sight to sensitive receptors to the maximum extent feasible taking into account environmental constraints (e.g., wind loading, property ownership, etc.).
- BCHD's construction contracts shall require implementation of the following construction best management practices (BMPs) by all construction contractors and subcontractors working in or around the Project site to reduce construction noise levels:

    - BCHD and its contractors and subcontractors shall ensure that construction equipment is properly muffled according to manufactures specifications or as required by the Redondo Beach Building & Safety Division, whichever is the more stringent.
    - BCHD and its contractors and subcontractors shall use electrically powered tools and facilities to the maximum extent feasible. Electrical power shall be used to run air compressors and similar power tools and to power any temporary structures, such as construction trailers or caretaker facilities.
    - BCHD and its contractors and subcontractors shall place noise-generating construction equipment and locate construction staging areas away from on-site and off-site sensitive uses (e.g., centrally on the existing campus), where feasible, to the satisfaction of the Redondo Beach Building & Safety Division.
- BCHD's construction contracts shall include the requirement that construction staging areas, construction worker parking and the operation of earthmoving equipment within the Project site, are located as far away from noise-sensitive sites as feasible. Contract provisions incorporating the above requirements shall be included as part of the construction documents, which shall be reviewed and approved by the City of Redondo Beach Building & Safety Division prior to issuance of demolition or grading permits.
- BCHD's construction contracts shall include the requirement that haul trucks remain on the designated haul routes identified in the Redondo Beach General Plan. Further, haul trucks should attempt to operate in traffic lanes that are located at the greatest distance from sensitive receptors, typically the lane nearest the roadway centerline on a four-lane roadway. Contract specifications shall be included in the proposed Project's construction documents, which shall be reviewed by the Redondo Beach Building & Safety Division prior to issuance of demolition or grading permits.

At least 1 month prior to the initiation of construction-related activities, BCHD shall prepare and distribute notices to residents and businesses located within a 0.25-mile radius of the Project site. At a minimum, the notices shall describe the overall construction schedule, advise residents, business owners, and employees of increased construction-related noise.

During construction, BCHD shall monitor noise and vibration resulting from construction activities to ensure that all noise attenuation measures are implemented as described in the Plan. Further, BCHD shall provide a non-automated telephone number for residents and employees to call to submit complaints associated with construction noise. BCHD shall keep a log of complaints and shall address complaints as feasible to minimize noise issues for neighbors. The Redondo Beach Building & Safety Division shall require modification to the conditions of the Construction Noise Plan, if necessary, to address non-performance issues.

MM NOI-2 Haul and Delivery Truck Operations. Where feasible, haul and delivery truck operations would enter and exit the Project site utilizing Lane 1 (the lane farthest from residences) along the given haul route.

MM NOI-3a Delivery Truck Hours and Idling. Deliveries from heavy-duty trucks, including refrigerator trucks, trash and recycling pick-ups, and parking lot sweeping, shall be restricted to daytime operating hours (7:00 a.m. to 4:00 p.m.); idling longer than 5 minutes in the same period shall be prohibited.

XIV. POPULATION AND HOUSING -- Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects to population and housing including displacing substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere?

Yes	No
☐	☒

The EIR concluded that the approved Project would not result in substantial unplanned population growth or the displacement of existing residents. The addition of 177 assisted living residents and approximately 170 new employees would represent a negligible increase in the local population (approximately 0.3 percent in Redondo Beach) and align with population growth projections in the Redondo Beach General Plan and the Southern California Association of Governments (SCAG) regional forecasts. The analysis found that local housing supply is sufficient to accommodate the housing demand generated by new employees, including affordable housing needs. Additionally, the EIR found that the phased construction plan would ensure that current residents of the 60 Memory Care units are not displaced until new units are available, and would not necessitate replacement housing.

As described in Section 3.2, *Sunrise Senior Living Project*, the revised Project would include the development of a senior living community facility consisting of a mix of Assisted Living units and Memory Care units, totaling not more than 217 units, together with a community commons space, a community multi-use room and a pool (collectively a senior living community). As such, the revised Project would provide the same number of units as described for the approved Project. However, under the revised Project, the Beach Cities Health Center would be demolished first in the construction sequence, prior to any development. As a result, the lease with the Silverado Beach Cities Memory Care Community has been terminated prior to demolition in Q3 2028 and the new units would not open until Q4 2030.

Statutory requirements applicable to RCFEs during the closure and resident transition process would apply to the Project. California Health and Safety Code § 1569.683 requires facilities to “take all reasonable steps to transfer affected residents safely and to minimize possible transfer trauma.” Key requirements include:

- **Notice To City and County:** Facilities (Silverado) are required to notify the appropriate city and county agencies of a proposed closure no later than 180 days before the anticipated closure date, or “as soon as practicably possible.”
- **Closure Plan:** The facility (Silverado Beach Cities Memory Care Community) must submit a formal closure plan to the appropriate licensing agency, the Community Care Licensing Division of the California Department of Social Services. The closure plan must include a relocation evaluation for each resident and identify staff available to assist with resident transitions. Once approved by the licensing agency, the plan must also be provided to the local Long-Term Care Ombudsman Program. After submission of the closure plan, the facility may not admit new residents.

- **60-Day Notice to Residents:** Following approval of the closure plan, Silverado must provide at least 60 days' written notice to residents, their legal representatives or responsible parties, and the Community Care Licensing Division.
- **Relocation Evaluations:** Silverado must prepare an individualized relocation evaluation for each resident. Evaluations must include recommendations regarding the level and type of care needed and identify potential placement options within a 60-mile radius of the closing facility.
- **Role Of the Long-Term Care Ombudsman / Strike Team**: Upon learning of a facility closure, the local Long-Term Ombudsman Program activates a "Strike Team" to assist in meetings with the facility administration, residents and staff and oversees the transfer and relocation of residents. Strike Team members meet regularly through the transition process and can include local organizations such as BCHD to support in the transition.

BCHD proactively notified the City of Redondo Beach on June 1, 2026, and the Los Angeles County Office of the Ombudsman May 29, 2026, of the closure. There are other existing Senior Living facilities in the region, for example the Kensington Redondo Beach (Assisted Living at the Kensington Redondo Beach - The Kensington Redondo Beach | The Kensington Redondo Beach) and Sunrise of Hermosa Beach (Sunrise Senior Living - Sunrise Hermosa Beach), in addition to other Silverado facilities (Silverado Website; Torrance/Rolling Hills, Alhambra, Beverly Grove, and Costa Mesa locations) that would be available to accommodate current residents of the Silverado Beach Cities Memory Care Community. The NIC Maps data Q3 2026 occupancy rate of memory care units in the Los Angeles market was 93 percent, resulting in 230 units currently vacant – enough to absorb the displaced residents without any market expansion. Therefore, the market has sufficient capacity for all approximately 110 Silverado residents to be relocated over the 12 month transition period from the date of the District termination notice of May 28, 2026.

BCHD is able to provide transition support for residents of Silverado, as appropriate. For example, BCHD's Community Services team and social workers have connected between April 24 to August 5, 2026 with Silverado and offered to provide support, where appropriate. Further, BCHD has corresponded between May 29 and July 15, 2026, with the Los Angeles County Long-Term Care Ombudsman Services at WISE & Healthy Aging to inform the Long-Term Care Ombudsman Program of the Board's action and express BCHD's willingness to participate in a multidisciplinary effort to support residents throughout the relocation process.

As a result, the construction of new replacement housing would not be necessary as a result of the revised Project and impacts would remain less than significant.

XV. PUBLIC SERVICES -- Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services: fire protection, police protection, schools, parks, or other public facilities?

Yes	No
☐	☒

The EIR concluded that the approved Project would not result in significant impacts on public services or require new or altered facilities. The analysis found that fire protection and emergency medical services, primarily provided by the Redondo Beach Fire Department, would experience a modest increase of approximately 244 emergency medical calls per year (i.e., an approximately 3 percent rise) which could be accommodated by existing stations without triggering new construction or facility alterations. Similarly, police protection services from the Redondo Beach and Torrance Police Departments would not be substantially affected by the increase in residents, employees, and visitors, and no expansion of police facilities is planned. Overall, the demand on public services would be minor and would not result in substantial adverse physical impacts.

The EIR identifies no impact to public services. The revised Project would result in a mix of Independent Living units, Assisted Living units, and Memory Care units, totaling not more than 217 units, which is the same total number of units that was previously evaluated. As a result, the revised Project would not be expected to adversely impact public services and would not result in impacts related to the need for new or physically altered governmental facilities in order to maintain acceptable service ratios, response times, or other performance objectives of any of the public services. Further, the revised Project would not expand recreational use and would not create the need for additional school capacity, library, or health services.

XVI. RECREATION -- Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in an increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or that include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Yes	No
☐	☒

The EIR identifies no adverse impacts to recreation. As described in Section XV, *Recreation*, the revised Project would result in the same number of units that was evaluated in the previous EIR and would not result in an increase in the use of existing parks or other recreational facilities, such that physical deterioration of the facility would occur or be accelerated.

XVII. TRANSPORTATION -- Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause effects to transportation/traffic including: an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system; exceedance, either individually or cumulatively, of a level of service standard established by the county congestion management agency for designated roads or highways; a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks; substantial increase in hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); inadequate emergency

access; inadequate parking capacity; and/or a conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

Yes	No
☐	☒

The EIR found that the approved Project would not result in significant transportation impacts. The analysis evaluated potential construction-related impacts associated with heavy haul truck trips and construction worker commute trips, which would be mitigated through a Construction Traffic and Access Management Plan (MM T-2). The analysis also evaluated operational impacts using VMT as the primary metric. Phase 1 of the approved Project would reduce daily vehicle trips compared to existing conditions, while Phase 2 would increase daily trips slightly but still reduce AM and PM peak period trips. VMT per employee and per capita would remain below applicable significance thresholds. The EIR determined that potential operational impacts could be reduced with a recommended Transportation Demand Management Plan (Recommended MM T-1) and relocation of a bus stop (MM T-3). The approved Project would not conflict with regional or local transportation plans or policies, and no significant hazards or emergency access issues would occur. Post-construction, emergency access would be maintained through multiple entry points and internal circulation.

Given the reduced scope and schedule of construction, the construction-related trip generation associated with the revised Project would be reduced as compared to the approved Project. With the implementation of MM T-2 requiring the preparation and implementation of a Construction Traffic and Access Management Plan, impacts would remain less than significant. Further, given the reduction in the scope of development and uses associated with the revised Project, operational trip generation would also be reduced. With the implementation of MM T-1 requiring the preparation and implementation of a Transportation Demand Management (TDM) Plan, impacts would remain less than significant. MM T-3 (Relocation of Beach Cities Transit Line 102) would no longer be required because the revised Project would not alter the existing transit stop along eastbound Beryl Street.

Mitigation Measures

The following mitigation measures, which were adopted and incorporated into the approved Project, have been adapted and would be implemented as a part of the revised Project to mitigate potential adverse impacts to transportation to a less than significant level:

MM T-1 Transportation Demand Management (TDM) Plan. The Beach Cities Health District (BCHD) would prepare and implement a comprehensive TDM plan, which would provide trip reduction strategies for BCHD employees, tenants, and campus visitors. The TDM plan would be prepared by a qualified transportation engineer/planner and overseen by a TDM Coordinator to be designated by BCHD. The TDM plan would be developed prior to the issuance of a Conditional Use Permit (CUP) for the Project and would be continuously maintained and adjusted as needed.

The BCHD TDM Coordinator would monitor employee, tenant, and visitor mode share with annual surveys and develop annual reports for submittal to the BCHD Board of Directors. The surveys shall capture trip origin data, travel mode, rideshare (e.g., number of people in the party), and other key data and indicators for TDM program performance relative to vehicle miles traveled (VMT) (e.g., employee incentives for bicycling to work). The BCHD TDM Coordinator would ensure that monitoring efforts capture all BCHD-related travel behavior. Annual monitoring reports

would include trip length surveys completed at least biannually by a sample of BCHD employees and tenants by BCHD employees (e.g., trip origin data collection). Survey results would be used to determine the appropriate TDM measures to employ in the coming year to maximize reductions in VMT per capita, champion transit and alternative mode transportation to BCHD employees, develop appropriate incentives to increase BCHD's transit mode share incrementally over time, and develop effective marketing tools to advertise transit and non-vehicular travel mode availability and incentives.

Each annual TDM Program monitoring report would:

- Describe the TDM efforts in place at the time to reduce vehicular trips;
- Summarize collected employee and tenant survey data and results;
- Evaluate survey data and results, comparing trends and annual changes;
- Evaluate change in available transportation infrastructure and programs serving the campus;
- Provide recommendations for adjustments to the TDM Program to adaptively manage VMT reductions for employees, tenants, and visitors.

The TDM Coordinator would oversee annual monitoring and reporting to evaluate the effectiveness of the TDM measures being implemented at the campus and recommend adjustments as needed to the TDM plan on an annual basis. Final annual reports and data (e.g., survey data) shall be shared with the City of Redondo Beach and made readily available for public review and use. Information regarding the TDM plan shall be distributed to all BCHD employees and tenants and shall be posted on BCHD's website and other marketing materials for BCHD visitors and updated annually as needed based on the annual reports.

The TDM Coordinator would consider a range of measures for the TDM plan to reduce employee and visitor VMT per capita, including, but not limited to, the following:

- Provide employee incentives to participate in a vanpool program and regularly advertise the opportunities to vanpool through a variety of employee communication formats.
- Partner with rideshare companies such as Uber or Lyft to guarantee availability of an emergency ride home or provide access to BCHD vehicles for this purpose.
- Offer employee TDM benefits for use of active transportation commuter modes, including ridesharing, transit, bicycling, walking, carpool/vanpool, etc. Incentives for BCHD employees could include flexible scheduling or options for telecommuting.
- Maximize opportunities for BCHD employees to telecommute as part of regular scheduling.
- Provide a transportation information center and wayfinding signage for nearby Beach Cities Transit Line 102 bus stops.
- Expand the proposed onsite bicycle facilities (i.e., shower, racks, and lockers) for BCHD employees in an amount and location informed by annual employee surveys and monitoring reports.
- Encourage bicycles as a primary commute mode for employees and provide incentives for biking to work, including providing free or discounted equipment to employees such as helmets, locks, bicycle commuter gear, and bicycles (electric or non-electric).
- Coordinate with the City of Redondo Beach to identify and facilitate new bicycle paths between the BCHD campus and neighboring communities, particularly linkages to existing

bicycle path segments. BCHD and the City of Redondo Beach shall ensure that all bicycle paths to the campus are well-signed, provide lighting, and are regularly patrolled by law enforcement.

- Provide commuter clubs for employees and campus visitors to support a collaborative approach to TDM.
- Maintain and expand onsite bicycle parking for BCHD visitors in an amount and location informed by visitor surveys and annual monitoring reports.
    - Maintain and expand short-term bicycle parking within the BCHD campus to meet changing demands evaluated in the TDM Program annual reports.
    - Provide well-lit, clearly signed, bicycle parking that is convenient and in close proximity to the Entry Plaza to encourage bicycling by visitors.
    - Provide secure short-term bicycle parking and/or a bicycle parking attendant, bicycle valet, or indoor bicycle parking facility to prevent theft and ensure parking availability for BCHD visitors.
    - Design bicycle racks with space-efficient configurations, such as vertically staggered racks and two-tier racks.
    - Provide a bicycle station at the campus as a part of the Metro Bike Share or a new bike share program specific to BCHD. Funding shall be determined based on the area required for the bicycle station. The bicycle share station shall be well-lit and located at a safe and convenient location adjacent to the Entry Plaza.

MM T-2 Construction Traffic and Access Management Plan Following preparation of the final design plan of the Project, the Beach Cities Health District (BCHD) shall expand upon the Construction Traffic Control Plan and prepare, implement, and maintain a Construction Traffic and Access Management Plan to address and manage traffic during construction. The Construction Traffic and Access Management Plan shall be subject to review and approval by the California Department of Transportation (Caltrans), County Department of Transportation (DOT), and Redondo Beach Public Works Department Engineering Division prior to issuance of a Conditional Use Permit (CUP). The Construction Traffic and Access Management Plan shall be designed to:

- Prevent traffic impacts on the surrounding roadway network;
- Minimize parking impacts both to public parking and access to private parking to the greatest extent practicable;
- Ensure safety for construction workers and the surrounding community; and
- Prevent substantial truck traffic through residential neighborhoods.

The Plan shall, at a minimum, include the following:

- Designated haul routes consistent with the Redondo Beach General Plan designations;
- On-site staging areas, which would avoid residential streets to the maximum extent feasible;
- Traffic control procedures (e.g., traffic cones, temporary signs, changeable message signs, and construction flaggers at the three driveways along North Prospect Avenue as well as the proposed driveways along Beryl Street and Flagler Lane) to address circulation requirements and public safety in accordance with the standards in the County DOT Area Traffic Control Handbooks;
- Emergency access provisions (i.e., North Prospect Avenue and Beryl Street);

- On-site construction crew parking to the maximum extent feasible; and
- Prohibition of crew parking in adjacent residential neighborhoods.

Ongoing Requirements throughout the duration of construction:

- A detailed Construction Traffic Control Plan for work zones shall be maintained. At a minimum, this shall include parking and travel lane configurations; warning, regulatory, guide, and directional signage; and area sidewalks, bicycle lanes, and parking lanes. Such plans shall be reviewed and approved by the Redondo Beach Community Development Department and Redondo Beach Public Works Department prior to issuance of a demolition, excavation, grading, or building permit and implemented in accordance with this approval.
- Work within the public right-of-way shall be performed between 9:00 a.m. and 4:00 p.m. This work includes dirt and demolition material hauling and construction material delivery. Work within the public right-of-way outside of these hours shall only be allowed contingent upon the issuance of an after-hours construction permit from the Redondo Beach Public Works Department Engineering Division.
- Streets and equipment shall be cleaned in accordance with established Redondo Beach Public Works Department requirements.
- Trucks shall only travel on approved construction routes. Truck queuing/staging shall only be allowed at approved locations. Limited queuing may occur on the construction site itself.
- Materials and equipment shall be minimally visible to the public; the preferred location for materials is to be on-site, with a minimum amount of materials within a work area in the public right-of-way, subject to a current City of Redondo Beach permit.

Project Coordination Elements That Shall Be Implemented Prior to Commencement of Construction

- Prior to implementation of the Project, BCHD shall advise the traveling public of impending construction activities (e.g., information signs, portable message signs, and media listing/notification) as well as provide a call line for complaints and concerns regarding construction traffic.
- BCHD shall provide timely notification of construction schedules to all affected agencies (e.g., public and private transit, Redondo Beach Fire Department [RBFD], Redondo Beach Police Department [RBPD], and Redondo Beach Public Works Department Engineering Division) and to all owners and residential and commercial tenants of property within a radius of 500 feet prior to the implementation of the Project.
- BCHD shall coordinate construction work with affected agencies in advance of start of work. Approvals may take up to 2 weeks or longer per each submittal.
- BCHD shall obtain approval from the City of Redondo Beach of any haul routes for earth, concrete, or construction materials and equipment hauling.
- BCHD shall obtain an Excavation Permit, Street/Lane Closure Permit, Sewer Permit, Demolition Permit, and any other applicable permits for construction work requiring encroachment into public rights-of-way, detours, or any other work within the public right-of-way.

IVX. UTILITIES AND SERVICE SYSTEMS -- Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause effects to utilities and service systems including: exceedance of wastewater treatment requirements of the applicable Regional Water Quality Control Board; require or result in the construction of new water or wastewater treatment facilities, new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; require new or expanded entitlements to water supplies or new water resources to serve the project; result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments; be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs; and/or noncompliance with federal, state, and local statutes and regulations related to solid waste?

Yes	No
☐	☒

The EIR found that the approved Project would not result in significant impacts on utility and service systems, including water supply, wastewater, and solid waste management. While there would be an increase water consumption and wastewater generation compared to existing campus uses, the local water provider confirmed sufficient supply, and sewer infrastructure and treatment capacity are adequate to accommodate the additional demand. Solid waste generated during construction and operation would be managed in compliance with state standards and local regulations, and existing landfill capacity was determined to be sufficient. Overall, the demands on utilities and waste systems would be accommodated without causing significant environmental impacts.

Given the reduced scope of development, the revised Project would also result in a corresponding reduction in utility usage. The local water has previously confirmed sufficient supply, and sewer infrastructure and treatment capacity are adequate to accommodate the additional demand. As described for the approved Project, solid waste generated during construction and operation would be managed in compliance with state standards and local regulations, and existing landfill capacity was determined to be sufficient.

XX. WILDFIRE -- Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause effects to wildfire safety including: impairing an adopted emergency response plan; exacerbate wildfire risk due to slope, winds, and other factors and thereby expose project occupants to pollutant concentrations to from wildfire or the uncontrolled spread of wildfire; require the installation or maintenance of associated infrastructure (e.g. roads, fuel breaks, emergency water sources, power lines or other utilities that may exacerbate fire risk or may result in temporary or ongoing impacts to the environment; expose people or structures to significant risk including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Yes	No
☐	☒

The EIR identifies no impacts to wildfire. Similar to the approved Project, the revised Project would not expose people or structures at risk to pollutant concentrations from wildfire, uncontrolled spread of wildfire, or downslope flooding or landslides as a result of post-fire slope instability. Additionally, like the approved Project, the revised Project would not introduce new infrastructure that would exacerbate fire risk.

CONCLUSIONS

As described in the preceding sections, the proposed modifications and refinements to the approved Project do not require major revisions to the BCHD Healthy Living Campus Master Plan EIR because they would not result in any new or substantially more severe significant environmental impacts or potentially significant environmental impacts. Therefore, none of the conditions listed in Section 15162 would occur.

Based on the analysis and substantial evidence in Section 6, *Environmental Analysis*, the modifications and refinements described in this Addendum would not result in any of the conditions described in Section 15162 of the CEQA Guidelines calling for preparation of a Subsequent EIR. In summary, the revised Project:

- Would not result in any new significant environmental effects; and

- Would not substantially increase the severity of previously identified significant effects;

Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, that shows any of the following:

- The project will have one or more significant effects not discussed in the previous EIR;

- Significant effects previously examined will be substantially more severe than shown in the previous EIR;

- Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

- Mitigation measures or alternatives which are considerably different from those analyzed in the prior EIR would substantially reduce one or more significant effects on the physical environment, but the project proponents decline to adopt the mitigation measure or alternative.

These conclusions confirm that a subsequent or supplemental EIR is not required, and this Addendum the Final EIR for the Beach Cities Health District Healthy Living Campus Master Plan is the appropriate CEQA document under CEQA Guidelines Section 15164 to evaluate the environmental effects of the proposed modifications and refinements to the approved Project.