REVISED MITIGATION, MONITORING, AND REPORTING PROGRAM
OCTOBER 2026

California environmental Quality Act (CEQA) Guidelines Section 15097 require that the lead agency adopt a Mitigation, Monitoring, and Reporting Program (MMRP) for adopted mitigation measures and project revisions. The CEQA Guidelines provide that *"until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the [MMRP]."* The following revised MMRP provides a summary of each Mitigation Measure (MM) for the proposed Beach Cities Health District (BCHD) Healthy Living Campus Master Plan (Project), as revised for the proposed Sunrise Senior Living Facility (Revised Project).

PURPOSE

The purpose of the revised MMRP is to ensure that the revised mitigation measures provided in the Addendum to the Environmental Impact Report (EIR), necessary to minimize or avoid significant adverse effects are implemented. The revised MMRP can also act as a working guide to facilitate not only the implementation of mitigation measures, but also the monitoring, compliance, and reporting activities of the implementing agency and any monitors it may designate.

RESPONSIBILITIES

As the lead agency, the Beach Cities Health District (BCHD) would be responsible for implementing the adopted mitigation measures. For each MMRP activity, BCHD would either administer the activity, or delegate it to the Construction Contractor or another qualified professional. BCHD would also ensure that monitoring is documented as required and that deficiencies are promptly corrected. The City of Redondo Beach as well as other relevant agencies, would also be responsible for enforcement actions for activities within their jurisdictional purview to address any non-performance issues.

BCHD would be responsible for funding and successfully implementing all the mitigation measures identified in the revised MMRP. Standards for successful mitigation of impacts are implicit in many mitigation measures that include such requirements as obtaining permits or avoiding a specific impact entirely. Other mitigation measures include detailed success criteria. Additional mitigation success thresholds would be established by applicable agencies with jurisdiction through the permit process and through the review and approval of specific plans for the implementation of mitigation measures (e.g., Air Quality Management Plan, Construction Noise Management Plan, Construction Traffic and Access Management Plan).

MONITORING PROCEDURES

BCHD is responsible for integrating the mitigation monitoring procedures into the construction process in coordination with the Construction Contractor. To oversee the monitoring procedures and to ensure success, the qualified professional assigned to a monitoring action must be on-site during the applicable portion of construction or operation that has the potential to create a significant environmental impact or other impact for which mitigation is required.

Site visits and specified monitoring procedures performed by each qualified professional would be reported to BCHD. The qualified professionals would note any problems that may occur and take appropriate action as directed by BCHD to rectify the problem.

MONITORING TABLE

For each of the revised mitigation measures, Table 1 identifies: 1) the full text of the revised mitigation measure; 2) the key monitoring/reporting action(s) that needs to be performed, including the applicable timing; 3) the entity(ies) responsible for performing the action(s); and 4) the entities responsible for verifying compliance as well as implementing enforcement actions, if necessary.

Table 1. Revised Mitigation Monitoring and Reporting Program

Avoidance and Minimization Measure	Monitoring/ Reporting Action	Responsible/ Monitoring Party	Enforcement Agency
AESTHETICS AND SHADE/SHADOW EFFECTS			
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. This 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.	Revise site development plan to reduce the height of RCFE Building.	BCHD and Architect responsible for revising the site development plan.	BCHD and City of Redondo Beach Building & Safety Division.
AIR QUALITY			
MM AQ-1 Air Quality Management Plan. The Beach Cities Health District (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 for the Phase 1 preliminary site development plan or the Phase 2 development program. 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: o Quick replacement of ground cover in disturbed areas. o Watering of exposed surfaces three times daily. o Watering of all unpaved haul roads three times daily. o Covering all stock piles with tarp. o Post signs on-site limiting traffic to 15 miles per hour (mph) or less on unpaved roads. o Prohibit demolition when wind speed is greater than 25 mph. o Sweep streets adjacent to the Project site at the end of the day if visible soil material is carried over to adjacent roads.	Prepare Air Quality Management Plan for approval by the City of Redondo Beach for construction activities. Implement air quality management measures during construction.	BCHD responsible for preparing the plan. City of Redondo Beach Building & Safety Division responsible for approving the plan for construction activities. Construction contractor responsible for implementing the plan.	BCHD responsible for Construction Contractor oversight. City of Redondo Beach Building & Safety Division and Permit Compliance Staff responsible for enforcement actions, if necessary.

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o 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. o 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 U.S. Environmental Protection Agency (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.			
BIOLOGICAL RESOURCES			
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	Avoid construction activities within 500 feet of suitable vegetation and structures for birds during the general nesting season (i.e., between February 15 and August 31). Complete pre-construction bird nesting surveys for construction activities during the general	BCHD and Construction Contractor responsible for avoiding construction activities during the general nesting season. BCHD responsible for retaining a Qualified Biologist, if necessary.	BCHD responsible for ensuring access for the Qualified Biologist, if necessary, and compliance by Construction Contractor. USFWS responsible for enforcement actions related to migratory birds

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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.	nesting season, if necessary. Flag and avoid nesting birds and active nests. Consult with USFWS and CDFW, if necessary.	Qualified Biologist responsible for conducting pre-construction surveys and enforcing appropriate buffer distance, if necessary. BCHD responsible for consulting with USFWS and CDFW, if necessary.	and federally listed species. CDFW responsible for enforcement actions related to State-listed and other special status species.
CULTURAL RESOURCES			
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	Monitoring during the construction phases that involve ground-disturbing activities. Prepare daily monitoring logs. Cease work in the immediate vicinity upon discovery of any Tribal Cultural Resources. Comply with Public Resources Code	Native American Monitor responsible for monitoring and keeping daily monitoring logs. BCHD and Construction Contractor responsible for ceasing work in the immediate vicinity, upon discovery of any Tribal Cultural Resources.	BCHD responsible for ensuring access for the Native American Monitoring as well as compliance from Construction Contractor.

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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]).	Section 5097.98, and Health & Safety Code (H&SC) Section 7050.5.	BCHD and Consulting Tribe responsible for compliance with Public Resources Code Section 5097.98, and Health & Safety Code (H&SC) Section 7050.5	
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.	Develop and implement a Cultural Resources Monitoring Plan and Treatment Plan.	BCHD responsible for retaining a Qualified Archaeologist. Qualified Archaeologist responsible for preparing and implementing the plan.	BCHD responsible for ensuring access for the Qualified Archaeologist as well as compliance from Construction Contractor.
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	Retain a Qualified Archaeologist for the duration of ground-disturbing activities.	BCHD responsible for retaining a Qualified Archaeologist.	BCHD responsible for ensuring access for the Qualified Archaeologist as

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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.	Cease work within 100 feet upon inadvertent discovery of prehistoric or historic-period archaeological resources	BCHD and Construction Contractor responsible for ceasing work in the immediate vicinity, upon discovery of any inadvertent discoveries.	well as compliance from Construction Contractor.
ENERGY			
No avoidance and minimization measures for this impact area.	N/A	N/A	N/A
GEOLOGY AND SOILS			
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.	Incorporate all Geotechnical Report recommendations into all final grading plans, design drawings, and construction plans.	BCHD and Architect responsible for incorporating recommendations. City of Redondo Beach Building & Safety Division responsible for approving plans. Construction Contractor responsible for	BCHD responsible for Construction Contractor oversight. City of Redondo Beach Building & Safety Division and Permit Compliance Staff responsible for enforcement actions, if necessary.

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		complying with recommendations.	
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 onsite 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.	Worker awareness training program developed by Qualified Paleontologist. Submit documentation of employee attendance to City of Redondo Beach Permit Compliance Staff.	BCHD responsible for retaining a Qualified Paleontologist. Qualified Paleontologist responsible for preparing and implementing the awareness working awareness training program.	BCHD responsible for Construction Contractor oversight.
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.	Upon paleontological resources discovery, cease work in the immediate vicinity, notify City of Redondo Beach. Retain Qualified Paleontologist. Complete significance assessment and mitigation of impacts to the paleontological resource.	BCHD responsible for retaining a Qualified Paleontologist BCHD and Construction Contractor responsible for ceasing work in the immediate vicinity, upon discovery of any inadvertent discoveries.	BCHD responsible for ensuring access for the Qualified Paleontologist as well as compliance from Construction Contractor.

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GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE			
No avoidance and minimization measures for this impact area.	N/A	N/A	N/A
HAZARDS AND HAZARDOUS MATERIALS			
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, the 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.	Complete a comprehensive ACM, LBP, PCB, and mold survey prior to construction activities. Abate in compliance with all applicable Federal, State, and local codes and regulations, if necessary. Conduct additional surveys as new areas of the buildings become exposed.	BCHD responsible for retaining a licensed contractor(s). Licensed contractor(s) responsible for surveys and abatement, if necessary.	BCHD responsible for oversight of licensed contractor(s). City of Redondo Beach Building & Safety Division and Permit Compliance Staff responsible for enforcement actions.
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	Prepare and implement of a Soils Management Plan and Transportation Plan. Submit plans to the LACoFD Health Hazardous Materials Division, Los Angeles RWQCB, and City of Redondo Beach.	BCHD responsible for preparing plan. LACoFD Health Hazardous Materials Division, Los Angeles RWQCB, City of Redondo Beach, responsible the plan for construction	BCHD responsible for Construction Contractor oversight. LACoFD Health Hazardous Materials Division, Los Angeles RWQCB, and City of Redondo Beach responsible for

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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. <u>Stockpile Management</u> 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.		activities within their respective jurisdictions. Construction contractor responsible for implementing plan.	enforcement actions, if necessary

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• 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. <u>Decontamination Methods and Procedures</u> 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			

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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. <u>Truck Loading</u> 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. <u>Storm Water Management</u>			

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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. <u>Transportation Plan</u> 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).	Soil vapor monitoring using a PID. Cease work upon exceedance of OSHA exposure limits for PCE and other VOCs until reduced below limits by SVE vacuum blower	Construction Contractor responsible for monitoring soil vapor. Construction Contractor responsible for ceasing work if	BCHD responsible for Construction Contractor oversight.

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		exposure limits are exceeded.	
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 or tetrachloroethylene (PCE) and other volatile organic compounds (VOCs).	Use of SVE equipment during construction within confined spaces, as necessary.	Construction Contractor responsible for using SVE Equipment.	BCHD responsible for Construction Contractor oversight.
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., Los Angeles County Fire Department [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.	Cease work upon encountering previously unknown or unidentified soil and/or groundwater contamination. If necessary, retain a qualified environmental specialist, prepare a Human Health Risk Management Plan prepared, notify LACoFD Health Hazardous Materials Division, Los Angeles RWQCB, and prepare a Site Health and Safety Plan.	Construction Contractor responsible for ceasing work if previously unknown or unidentified contamination is discovered. BCHD responsible for retaining Qualified Environmental Specialist.	BCHD responsible for Construction Contractor oversight. LACoFD Health Hazardous Materials Division, and Los Angeles RWQCB responsible for enforcement actions, if necessary, within the purview of their jurisdictional authorities.
HYDROLOGY AND WATER QUALITY			
No avoidance and minimization measures for this impact area.	N/A	N/A	N/A
LAND USE AND PLANNING			

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No avoidance and minimization measures for this impact area.	N/A	N/A	N/A
NOISE			
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: o 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: o 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. o 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.	Prepare and implement the Construction Noise Management Plan. Prepare and distribute notices to residents and businesses located within a 0.25-mile radius of the Project site. Monitor noise and vibration resulting from construction activities. Provide a non-automated telephone number for residents and employees to call to submit complaints associated with construction noise.	BCHD responsible for preparing the plan. Construction Contractor responsible for implementing plan.	BCHD responsible for Construction Contractor oversight. City of Redondo Beach Building & Safety Division and Permit Compliance Staff responsible for enforcement actions, if necessary.

Table 1. Revised Mitigation Monitoring and Reporting Program

Avoidance and Minimization Measure	Monitoring/ Reporting Action	Responsible/ Monitoring Party	Enforcement Agency
o 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 Divisions 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.			

Table 1. Revised Mitigation Monitoring and Reporting Program

Avoidance and Minimization Measure	Monitoring/ Reporting Action	Responsible/ Monitoring Party	Enforcement Agency
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.	Haul and delivery trucks use Lane 1 as a haul route.	BCHD and Construction Contractor.	BCHD responsible for Construction Contractor oversight.
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.	Restrict deliveries to daytime operating hours and idling no longer than 5 minutes.	BCHD responsible ensuring compliance with delivery truck hours and idling requirements.	City of Redondo Beach responsible for enforcement actions, if necessary.
POPULATION AND HOUSING			
No avoidance and minimization measures for this impact area.	N/A	N/A	N/A
PUBLIC SERVICES			
No avoidance and minimization measures for this impact area.	N/A	N/A	N/A
TRANSPORTATION			
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	Prepare and implement of a TDM plan.	BCHD-designated TDM Coordinator responsible for preparing and implementing plan.	City of Redondo Beach responsible for review and enforcement of the TDM plan consistent with RBMC Section 10-2.2406.

Table 1. Revised Mitigation Monitoring and Reporting Program

Avoidance and Minimization Measure	Monitoring/ Reporting Action	Responsible/ Monitoring Party	Enforcement Agency
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 cities 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.			

Table 1. Revised Mitigation Monitoring and Reporting Program

Avoidance and Minimization Measure	Monitoring/ Reporting Action	Responsible/ Monitoring Party	Enforcement Agency
• 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 campus and neighboring communities, particularly linkages to existing bicycle path segments. BCHD and the cities 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 BCHD 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. o Maintain and expand short-term bicycle parking within the BCHD campus to meet changing demands evaluated in the TDM Program annual reports. o Provide well-lit, clearly signed, bicycle parking that is convenient and in close proximity to the Entry Plaza to encourage bicycling by visitors.			

Table 1. Revised Mitigation Monitoring and Reporting Program

Avoidance and Minimization Measure	Monitoring/ Reporting Action	Responsible/ Monitoring Party	Enforcement Agency
o 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. o Design bicycle racks with space-efficient configurations, such as vertically staggered racks and two-tier racks. o 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 for 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 both 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;	Prepare a Construction Traffic and Access Management Plan and submit to Caltrans, County DOT, and Redondo Beach Public Works Department Engineering Division.	BCHD responsible for preparing the plan. Construction Contractor responsible for implementing the plan.	BCHD responsible for Construction Contractor oversight. Caltrans, County DOT, and Redondo Beach Public Works Department Engineering Division enforcement actions, if necessary, within the purview of their jurisdictional authorities.

Table 1. Revised Mitigation Monitoring and Reporting Program

Avoidance and Minimization Measure	Monitoring/ Reporting Action	Responsible/ Monitoring Party	Enforcement Agency
• 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			

Table 1. Revised Mitigation Monitoring and Reporting Program

Avoidance and Minimization Measure	Monitoring/ Reporting Action	Responsible/ Monitoring Party	Enforcement Agency
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 cities 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.			
UTILITIES AND SERVICE SYSTEMS			
No avoidance and minimization measures for this impact area.	N/A	N/A	N/A
CUMULATIVE IMPACTS			
No avoidance and minimization measures for this impact area.	N/A	N/A	N/A