



THE CITY OF SAN DIEGO

# ADDENDUM

Project No. 696413  
Addendum to Negative Declaration No. 88-0253 and  
Mitigated Negative Declaration Nos. 88-1297, 6839, and 116107  
SCH No. N/A

**SUBJECT: Sharp Metropolitan Medical Campus (SMMC) Modernization and Improvement Project:** CONDITIONAL USE PERMIT (CUP) AMENDMENT, PLANNED DEVELOPMENT PERMIT (PDP) AMENDMENT, AND SUMMARY STREET VACATION for upgrades to the existing SMMC, including a six-level approximately 95,000-square-foot (SF) expansion of the existing Mary Birch building; the construction of a new approximately 3,000-SF waste dock; the construction of a new seven-level approximately 260,000-SF hospital tower and new approximately 30,000-SF concourse entry; the replacement of the existing Rady access bridge; the demolition of the existing dietary building and service building; the demolition of the 40,000-SF Knollwood Building and the construction of an approximately 120,000-SF administration office building; the partial demolition of the existing eight-level central and south hospital towers down to the existing second level podium base, which would remain; the demolition of the existing plumbing shop; central energy plant (CEP) modifications; and a street vacation of approximately 169-SF of excess City of San Diego (City) Right-of-Way for a new driveway near the transition of Birmingham Way and Meadow Lark Drive. The Project would result in a net decrease of 113 hospital beds, consisting of a 27--bed increase associated with the Mary Birch expansion, a 152-bed increase associated with the new hospital tower, and a 256-bed decrease associated with the demolition of a portion of the south and central towers. The CUP amendment would allow for the continuation of hospital uses within a commercial zone. The PDP amendment would allow deviations from the CO-1-2 zone building height limit of 60 feet for heights ranging between approximately 122 and 139 feet for the new hospital tower and between approximately 83 and 90 feet for the Mary Birch expansion. The Project site is zoned CO-1-2 and is within the Serra Mesa Community Plan area. (LEGAL DESCRIPTION: Map No. 10566 Parcel 2, Map No. 12649 Parcels 1 and 2, and MM 36 of Lot 1199) APPLICANT: Sharp Healthcare and Sharp Memorial Hospital.

## I. SUMMARY OF PROPOSED PROJECT

The SMMC Modernization and Improvement Project (Project) would require a CUP Amendment, PDP Amendment, and a VAC for upgrades to the existing SMMC, which is located on a 41-acre site at 7901 Frost Street in Serra Mesa (Figure 1 and Figure 2). Sharp Memorial Hospital opened in 1955, a CUP was issued in 1988, numerous CUP amendments



and PDP amendments have been processed since 1988, and a phased modernization program was approved by the City in 2004. Additional upgrades are necessary to further modernize the facility and comply with current seismic requirements.

### **Project Components**

The Project includes demolition components, new building construction components, structure replacement/modification components, utility components, landscaping components, and roadway improvement components, as detailed below.

#### Demolition Components

The Project would involve demolition of the existing dietary building and service building; demolition of the 40,000-SF Knollwood Building; partial demolition of the existing eight-level central and south hospital towers down to the existing second level podium base, which would remain; and demolition of the existing plumbing shop.

#### Building Construction Components

The Project involves construction of a six-level, approximately 95,000-SF expansion of the existing Mary Birch building and the construction of a new approximately 3,000-SF waste dock. The Mary Birch expansion would occur on the eastern side of the existing Mary Birch building and would accommodate a materials loading dock and materials management area, a relocated sterile processing department and laboratory, and three levels of patient care units (Figure 3).

The Project would also involve construction of a new seven-level, approximately 260,000-SF hospital tower and new approximately 30,000-SF concourse entry (Figure 3). The new hospital tower would include a dietary department, public spaces, a conference center, an interventional level with a preoperative expansion, diagnostic imaging and intensive care unit (ICU), and four levels of patient care units.

To replace the demolished 40,000-SF Knollwood Building, the Project would construct an approximately 120,000-SF administration office building (Figure 3).

In total, the Project would demolish 257,647 SF and add 497,689 SF, for a net increase of 240,042 SF. The Project would result in a net decrease of 113 hospital beds, consisting of a 27-bed increase associated with the Mary Birch expansion, a 152-bed increase associated with the new hospital tower, and a 256-bed decrease associated with the demolition of a portion of the south and central towers.

#### Structure Replacement/Modifications Components

Structure replacement and modifications would include the replacement of the existing Rady access bridge and modifications to the CEP.



### Utility Components

The Project would require on-site improvements to gas, sewer, domestic water, fire water, and storm drainpipes to serve the proposed new components. The improvements would involve constructing new pipes and associated appurtenances, removing existing pipes and associated appurtenances, and connecting to existing pipes.

### Landscaping Component

Landscaping improvements would be provided throughout the site in association with the above-mentioned structural improvements and include the planting of shade/street trees along Birmingham Drive and Birmingham Way, along access drives, and within parking areas, and the planting of flowering accent trees along pedestrian corridors. One specimen tree, a Torrey Pine located near the proposed concourse entry, would be replaced. A variety of shrubs and groundcover would be provided throughout the site.

### Roadway Improvement Component

The Project would include a VAC of approximately 169 SF of excess City right-of-way for a new driveway near the transition of Birmingham Way and Meadow Lark Drive. In addition, the Mary Birch Lane driveway off Health Center Drive would be improved to City standards.

### **Construction Activities**

Project construction is anticipated to begin in 2023 and be complete for all components in 2031. Construction materials would be brought on site from construction contractor warehouses and yards as needed. Construction trailer parking, staging, and laydown areas would occur within the SMMC. No off-site staging or laydown areas would be required.

### **Operations**

As mentioned above, the Project would result in a net decrease of 113 hospital beds, which would result in a decrease in daily trips to the site. While implementation of the Project would increase overall building area at the SMMC, the programs/departments affected by the Project would not change services currently provided by the SMMC.

## **II. ENVIRONMENTAL SETTING**

The project site would occur within 41-acres of the existing 127-acre institutional/health care center that includes the existing Sharp Memorial Hospital, Mary Birch Hospital for Women, Rees-Stealy-Medical Office Building, Mesa Vista Hospital, other treatment and rehabilitation centers, medical offices, and educational facilities, and Rady Children's Hospital (located to the east of the SMMC). This 127-acre institutional/health care center is located between State Route (SR-) 163 and Interstate (I-) 805, south of Mesa College Drive (Figure 1 and Figure 2).



The Project site is zoned CO-1-2 (Commercial Office), has a General Plan land use designation of Institutional and Public and Semi-Public Facilities, and has a Serra Mesa Community Plan land use designation of Institutional.

### III. SUMMARY OF ORIGINAL PROJECTS

The existing SMMC was authorized by a series of CUPs and PDPs, including CUP No. 86-0456, CUP No. 87-0076, CUP Amendment No. 88-0253, CUP Amendment No. 88-1297, CUP and PDP No. 41-0408, CUP No. 11504, PDP No. 11505, CUP 392017, and PDP No. 392018. These projects were analyzed under a series of environmental documents including Negative Declaration (ND) No. 88-0253, Mitigated Negative Declaration (MND) No. 88-01297, MND No. 6839, and MND 116107, as described below.

**Sharp Memorial Hospital ND No. 88-0253:** Amendment to CUP No. 10-365-5 to allow the expansion of the existing hospital facility with 100,000-SF of uses (16 additional beds and 60,000 SF of associated medical office uses).

As part of ND No. 88-0253, the potential traffic impacts associated with the hospital expansion were considered. The City's Engineering and Development Department reviewed the project to determine if the proposed expansion would require the preparation of a traffic study. Based on their review, it was determined that the proposed expansion would not substantially increase the existing traffic volumes generated by the hospital uses, and therefore a significant traffic impact was not identified.

The adequacy of on-site parking spaces was also reviewed. Upon completion of a previously approved parking structure, the hospital would provide a total of 1,643 on-site parking spaces. The parking supply was considered adequate to accommodate the potential 431-bed facility and related medical office uses.

**Sharp Memorial Hospital Amendment MND No. 88-1297:** Amendment to CUP No. 88-0253 to allow the expansion of the existing hospital facility with 340,000 SF of uses (central plant, rehabilitation center addition, women's center, and clinical office building).

The MND No. 88-1297 identified potentially significant impacts to traffic circulation. To mitigate the potentially significant impacts regarding traffic circulation, measures were included in the Mitigation Monitoring and Reporting Program and as conditions of the CUP. These measures have now been implemented.

**Sharp Hospital MND No. 6839:** CUP No. 11504, PDP No. 11505, and amendment to CUP No. 88-1297 and 41-0408 to construct a seven-story, 117-foot-tall, 315,621-SF hospital building and demolish five floors of an existing nine-story hospital building (North Tower). The project involved demolition of 272 parking spaces on site to allow for the construction of the proposed hospital building, and construction of 47 new parking spaces on site. The City conducted an Initial Study which determined that the proposed project could have a significant environmental effect in the following area(s): Traffic Circulation/Transportation and Paleontological Resources. Subsequent revisions in the project proposal created the specific mitigation identified in MND No. 6839. The project as revised avoided or mitigated



the potentially significant environmental effects previously identified through inclusion mitigation measures, which have now been implemented.

**Sharp Parking Facility No 3 Mitigated Negative Declaration No. 116107:** CUP 11504 and PDP No. 11505 to allow removal of existing surface parking lot and trailer and construct a five-story approximately 994-space parking structure and the addition of 20 bicycle and 20 motorcycle spaces. The project included measures to mitigate potentially significant impacts to Paleontological Resources. These measures have now been implemented.

#### **IV. ENVIRONMENTAL DETERMINATION**

The City previously prepared and adopted the associated ND 88-0253, MND 88-1297, MND 6839, and MND 116107. Based on all available information in light of the entire record, the analysis in this Addendum, and pursuant to Section 15162 of the State California Environmental Quality Act (CEQA) Guidelines, the City has determined the following:

- There are no substantial changes proposed in the Project which will require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- Substantial changes have not occurred with respect to the circumstances under which the Project is undertaken which will require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- 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 environmental document was certified as complete or was adopted, shows any of the following:
  - a. The Project will have one or more significant effects not discussed in the previous environmental document;
  - b. Significant effects previously examined will be substantially more severe than shown in the previous environmental document;
  - 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 previous environmental would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.



Based upon a review of the current Project, none of the situations described in Sections 15162 and 15164 of the State CEQA Guidelines apply. No changes in circumstances have occurred, and no new information of substantial importance has manifested, which would result in new significant or substantially increased adverse impacts as a result of the Project. Therefore, this Addendum has been prepared in accordance with Section 15164 of the CEQA State Guidelines. Public review of this Addendum is not required per CEQA.

**V. IMPACT ANALYSIS**

The following includes the Project-specific environmental review pursuant to the CEQA. The analysis in this document evaluates the adequacy of the ND and MNDs relative to the Project.

**Table 1  
Impact Assessment Summary**

<b>Environmental Issues</b>	<b>Previous Findings</b>	<b>Project</b>	<b>New Mitigation?</b>	<b>Project Resultant Impact</b>
Aesthetics/ Neighborhood Character	No Potential for Significant Environmental Impact	No new impacts	No	Less Than Significant Impact
Agriculture Resources/ Natural Resources, Mineral Resources	No Potential for Significant Environmental Impact	No new impacts	No	No Impact
Air Quality	No Potential for Significant Environmental Impact	No new impacts	No	Less Than Significant Impact
Biology	No Potential for Significant Environmental Impact	No new impacts	No	Less Than Significant Impact
Energy	No Potential for Significant Environmental Impact	No new impacts	No	Less Than Significant Impact
Geology/ Soils	No Potential for Significant Environmental Impact	No new impacts	No	Less Than Significant Impact
Historical Resources	No Potential for Significant Environmental Impact	No new impacts	No	No Impact
Human Health/ Public Safety/ Hazardous Materials	No Potential for Significant Environmental Impact	No new impacts	No	Less Than Significant Impact
Hydrology/ Water Quality	No Potential for Significant Environmental Impact	No new impacts	No	Less Than Significant Impact
Land Use	No Potential for Significant Environmental Impact	No new impacts	No	Less Than Significant Impact
Noise	No Potential for Significant Environmental Impact	No new impacts	No	Less Than Significant Impact
Paleontological Resources	Less Than Significant with Mitigation	No new impacts	No	Less Than Significant Impact
Population and Housing	No Potential for Significant Environmental Impact	No new impacts	No	No Impact



**Table 1  
Impact Assessment Summary**

<b>Environmental Issues</b>	<b>Previous Findings</b>	<b>Project</b>	<b>New Mitigation?</b>	<b>Project Resultant Impact</b>
Public Services	No Potential for Significant Environmental Impact	No new impacts	No	Less Than Significant Impact
Recreational Resources	No Potential for Significant Environmental Impact	No new impacts	No	No Impact
Transportation/ Circulation	Less Than Significant with Mitigation	No new impacts	No	Less Than Significant Impact
Utilities	No Potential for Significant Environmental Impact	No new impacts	No	Less Than Significant Impact
Water Conservation	No Potential for Significant Environmental Impact	No new impacts	No	Less Than Significant Impact
Mandatory Findings of Significance	Less Than Significant with Mitigation	No new impacts	No	Less Than Significant Impact

The resources listed in Table 1 were analyzed in the previous environmental documents using an initial study checklist. The following issues were determined to be potentially significant with mitigation ultimately identified for these topics:

- Paleontological Resources
- Transportation/Circulation

**Aesthetics/ Neighborhood Character**

*Prior Environmental Reviews*

The prior environmental reviews found that improvements would not alter the existing visual character of the area, obstruct scenic views or vistas, or create an aesthetically negative site, as the improvements would be similar to existing structures in bulk, height, and character. Improvements would also not result in substantial changes in topography, ground surface relief features, or unique geologic or physical land features. A single Torrey Pine tree was removed as part of implementation of CUP No. 11504, PDP No. 11505, and amendment to CUP No. 88-1297 and 41-0408; however, the loss of this tree was offset by the planting of five new Torrey Pine trees. Improvements would not create substantial light or glare or result in substantial shading of other properties. No potential for significant environmental impacts was identified.

*Project*

The Project site is within an urbanized area that includes existing hospital buildings, medical office buildings, multi-story parking structures, paved surface parking lots and streets, sidewalks, overhead utility lines and streetlights, retaining walls, and landscaped areas. Rady Children’s Hospital is located to the north and east of the SMMC. No scenic vistas occur or are designated within the Project vicinity. The Project site is not located near or adjacent to a



designated state scenic highway and no impacts on scenic resources within a state scenic highway could occur as a result of Project implementation.

Construction and demolition activities would be temporary and would not substantially alter the existing urbanized visual character of the Project area. Upon completion of construction, the new buildings would be consistent with existing buildings at the site in relation to architectural style, bulk, and scale. Design of the new structures would promote the sense of the buildings having a common theme and purpose with the existing SMMC and would not be incompatible with surrounding development or substantially alter the existing character of the area. The Project would be designed and constructed to conform with regulations, goals, and policies related to scenic quality included the San Diego Municipal Code (SDMC), General Plan, and the Serra Mesa Community Plan. The City's development review process would ensure compliance. An existing Torrey Pine tree planted in 2010 would need to be removed for the Project but it would be replaced in the same location. No stands of mature trees or unique geologic or physical features are present to be affected by the Project. The Project would also not result in a substantial change in topography or ground surface relief features. Therefore, a less-than-significant impact to aesthetic/neighborhood character would occur from construction and operation of the Project.

Temporary construction lighting and permanent facility lighting would be required to comply with applicable SDMC regulations, which are generally intended to control and reduce impacts associated with light and glare on neighboring properties. Project construction would be limited to daytime hours, further reducing the potential impacts from temporary lighting, which would be less than significant. Permanent lighting design would comply with recent recommendations from the Illuminating Engineering Society for Hospitals and Healthcare Facilities, Department of Health Care Access and Information (HCAI) standards, and Title 24 California Energy Code and would also consider the latest research of the effect of light on human health. The Project may result in a net increase in the amount of permanent facility lighting compared to the existing condition; however, considering the location of the Project in a highly urbanized part of the City, new facility lighting would represent an incremental increase in the total amount of lighting used in the vicinity. Building exterior finishes would comply with City standards addressing light reflectivity. Impacts from light and glare would be less than significant.

Based on the foregoing analysis and information, there is no evidence that the Project would require a major change to the previous environmental documents. The Project would not result in any new significant impact or substantially increase the severity of impacts identified in the previous environmental documents.

### **Agriculture Resources/ Natural Resources, Mineral Resources**

#### *Prior Environmental Reviews*

The prior environmental reviews found that no loss of availability of mineral resources or conversion of agricultural land would occur since the site is developed with a hospital use and does not include land suitable for mineral extraction or agricultural use. No potential for significant environmental impacts was identified.



### *Project*

The Project site is in an urban and built environment that is not available for agricultural use or mining activity; therefore, no impact to agricultural resources or mineral resources would occur from Project implementation.

Based on the foregoing analysis and information, there is no evidence that the Project would require a major change to the previous environmental documents. The Project would not result in any new significant impact or substantially increase the severity of impacts identified in the previous environmental documents.

### **Air Quality**

#### *Prior Environmental Reviews*

The prior environmental reviews found that the improvements would be compatible with underlying zoning and would not conflict with or obstruct implementation of the applicable air quality plan. While improvements could result in temporary air pollutant emissions, such as dust from grading, compliance with regulations and implementation of standard dust control practices would result in the improvements not violating an air quality standard, exposing sensitive receptors to substantial pollutant concentrations, creating objectionable odors affecting a substantial number of people, or exceeding 100 pounds per day of particulate matter less than 10 microns (PM<sub>10</sub>). The improvements would not alter air movement in the area or cause a substantial alteration in moisture, temperature, or other change in climate, either locally or regionally. No potential for significant environmental impacts was identified.

#### *Project*

The results of the Air Quality Technical Report (HELIX Environmental Planning, Inc. [HELIX] 2021a) prepared for the Project are incorporated into this analysis.

The San Diego Air Pollution Control District (SDAPCD) is required, pursuant to the federal Clean Air Act (CAA), to reduce emissions of criteria pollutants for which the San Diego Air Basin (SDAB) is in nonattainment. The SDAB is classified as a nonattainment area under the National Ambient Air Quality Standards (NAAQS) for 8-hour ozone and as a nonattainment area under the California Ambient Air Quality Standards (CAAQS) for 1-hour ozone, 8-hour ozone, PM<sub>10</sub>, and particulate matter less than 2.5 microns (PM<sub>2.5</sub>). Strategies to achieve these emissions reductions are developed in the Attainment Plan and State Implementation Plan (SIP), prepared by the SDAPCD for the region. Both the Attainment Plan and SIP are based on San Diego Association of Governments (SANDAG) population projections, as well as land use designations and population projections included in general plans for cities located within the County. Projects that propose development that is consistent with the growth anticipated by the local jurisdictions' general plans would be consistent with the Attainment Plan.

The proposed Project would replace existing facilities with similar uses and would not accommodate an increase in employees or an increase in the number of hospital beds. It would therefore not result in development that is greater than that anticipated in the



General Plan or SANDAG's growth projections upon which the Attainment Plan is based. Furthermore, as detailed below, the Project would not result in a significant air quality impact with regards to construction- and operational-related emissions of ozone precursors or criteria air pollutants. Impacts associated with conformance to regional air quality plans would be less than significant.

The Project would generate criteria pollutants in the short-term during construction and the long-term during operation. To determine whether the Project would result in emissions that would violate an air quality standard, contribute substantially to an existing or projected air quality violation, or have an adverse effect on human health, the Project's emissions were evaluated based on the quantitative emission thresholds established by the SDAPCD using the California Emissions Estimator Model (CalEEMod; version 2020.4.0).

The results of the calculations for the various components of Project construction, which are grouped by schedule, are shown in Table 2, *Maximum Daily Construction Emissions*. The data are presented as the maximum anticipated daily emissions for comparison with the SDAPCD thresholds. As shown in Table 2, emissions of all criteria pollutants and ozone precursors from Project construction would be below the SDAPCD's significance thresholds. Therefore, direct impacts from criteria pollutants generated during Project construction would be less than significant.

**Table 2  
MAXIMUM DAILY CONSTRUCTION EMISSIONS**

Year	Pollutant Emissions (pounds per day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Mary Birch Expansion/Waste Dock Construction/CEP Renovation</b>						
2023	4	39	32	<0.5	7	3
2024	3	23	29	<0.5	2	1
<b>Hospital Tower Construction/Rady Bridge Replacement</b>						
2025	3	29	30	<0.5	5	3
2026	2	12	14	<0.5	1	1
2027	2	12	14	<0.5	1	1
2028	2	18	25	<0.5	2	1
<b>Concourse Entry Construction/Knollwood Building Replacement</b>						
2028	4	44	43	<0.5	8	4
2029	3	29	29	<0.5	5	3
2030	3	16	29	<0.5	1	1
<b>Central and South Towers Demolition</b>						
2030	1	4	8	<0.5	1	<0.5
2031	1	4	8	<0.5	3	1
<b>Maximum Daily Emissions</b>	<b>4</b>	<b>44</b>	<b>43</b>	<b>&lt;0.5</b>	<b>8</b>	<b>4</b>
<i>SDAPCD Thresholds</i>	75	250	550	250	100	55



<b>Significant Impact?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
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Source: HELIX Environmental Planning, Inc. 2021a

VOC = volatile organic compound; NO<sub>x</sub> = nitrogen oxides; CO = carbon monoxide; SO<sub>x</sub> = sulfur oxides;

PM<sub>10</sub> = particulate matter 10 microns or less in diameter; PM<sub>2.5</sub> = particulate matter 2.5 microns or less in diameter

The Project's net increase in operational emissions over existing conditions was estimated using CalEEMod. Only on-site energy consumption (natural gas) was considered, since the Project would not increase the number of hospital beds and would therefore not result in an increase in existing vehicle trips to and from the site or associated mobile-source emissions. Table 3, *Net Daily Operational Emissions*, presents the summary of the net increase in operational emissions for the Project. As shown in Table 3, the net increase in emissions of all criteria pollutants associated with the Project's increase in natural gas usage over existing conditions would be below the daily thresholds. Therefore, operation of the Project would not result in a significant impact on air quality.

**Table 3  
NET DAILY OPERATIONAL EMISSIONS**

Category	Pollutant Emissions (pounds per day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Total Daily Emissions</b>	<b>1</b>	<b>8</b>	<b>7</b>	<b>&lt;0.5</b>	<b>1</b>	<b>1</b>
<i>SDAPCD Thresholds</i>	<i>75</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>55</i>
<b>Significant Impact?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: HELIX Environmental Planning, Inc. 2021a

VOC = volatile organic compound; NO<sub>x</sub> = nitrogen oxides; CO = carbon monoxide; SO<sub>2</sub> = sulfur dioxide;

PM<sub>10</sub> = particulate matter 10 microns or less in diameter; PM<sub>2.5</sub> = particulate matter 2.5 microns or less in diameter

The Project would not result in an increase in traffic that could result in a carbon monoxide (CO) hot spot. Construction and operation of the Project also would not result in exposure of sensitive receptors to significant quantities of toxic air contaminants (TACs). In addition, evaluation of potential odors from the Project indicated that associated impacts would be less than significant.

Based on the foregoing analysis and information, there is no evidence that the Project would require a major change to the previous environmental documents. The Project would not result in any new significant impact or substantially increase the severity of impacts identified in the previous environmental documents.

## **Biology**

### *Prior Environmental Reviews*

The prior environmental reviews found that because the site and surrounding areas were developed, the improvements would not result in the reduction in the number of any



unique, rare, endangered, sensitive, or fully protected plant or animal species; result in a substantial change in the diversity of any plant or animal species; interfere with wildlife movement; impact a sensitive habitat; or impact a wetland. Improvements would conform with the City's landscaping standards and would not introduce invasive species to the area. Improvements would also not conflict with City's Multiple Species Conservation Program (MSCP) since the site is not within or immediately adjacent to Multi-Habitat Planning Area (MHPA). No potential for significant environmental impacts was identified.

#### *Project*

The Project site is currently urbanized and primarily contains developed land that has a limited amount of non-native (ornamental) vegetation used in landscaping. Removal of some existing vegetation could occur as part of the Project but would be replaced in accordance with an approved landscaping plan. This includes a single Torrey Pine tree that was planted in 2010 that would be replaced in the same location. Removal of non-native vegetation would not result in direct impacts to special status plant or animal species or sensitive habitat. Vegetation removal during the bird nesting season could potentially affect bird species protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code; however, through regulatory compliance with the MBTA the Project would avoid impacts to nesting birds. The Project would not occur within or adjacent to MHPA, wetlands, or wildlife movement corridors or nursery sites. Therefore, the Project would result in less-than-significant impacts to biological resources.

Based on the foregoing analysis and information, there is no evidence that the Project would require a major change to the previous environmental documents. The Project would not result in any new significant impact or substantially increase the severity of impacts identified in the previous environmental documents.

### **Energy**

#### *Prior Environmental Reviews*

The prior environmental reviews found that the improvements would not result in the use of excessive amounts of fuel, energy, or power. No potential for significant environmental impacts was identified.

#### *Project*

Construction of the Project would result in a short-term increase in energy use associated primarily with fuel for construction equipment and vehicles. Such energy use would be temporary and typical of construction projects of this magnitude and would not result in the use of excessive amounts of fuel or energy. Operationally, the Project would not result in an increase in vehicle trips and would therefore not result in a permanent increase in transportation-related energy demand. While the improvements are expected to result in an increase in facility-related energy demand (i.e., electricity and natural gas), such increase would not be substantial in relation to existing conditions and would be limited to what is necessary for hospital operations. Impacts would therefore be less than significant.



Based on the foregoing analysis and information, there is no evidence that the Project would require a major change to the previous environmental documents. The Project would not result in any new significant impact or substantially increase the severity of impacts identified in the previous environmental documents.

## **Geology/Soils**

### *Prior Environmental Reviews*

The prior environmental reviews found that the site is located within a seismically active region of California, resulting in potential for geologic risk, but that the site is also located within Geologic Hazard Zone 52 of the City's Seismic Safety Study Maps, which indicates low geologic risk. Improvements would implement geotechnical engineering recommendations, including partial excavation and re-compaction of upper fill soils beneath structures, which would be verified prior to building permits being issued. Therefore, the improvements would not expose people or property to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards and would also not be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, potentially resulting in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse. The improvements would also not result in a substantial increase in wind or water erosion of soils, either on or off the site. No potential for significant environmental impacts was identified.

### *Project*

The results of the Geotechnical Investigation and addendum letter (Leighton Consulting, Inc. 2021 and 2022) prepared for the Project are incorporated into this analysis.

The Project site is not located within a State-mapped Earthquake Fault Zone, located within a City fault zone, or underlain by known faults. The nearest active fault is the Rose Canyon fault located approximately three miles west of the site. Considering the distance between the Project site and the nearest mapped active faults, the Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault and no impacts are anticipated.

The Project site is located within a seismically active region, as is all of Southern California, and the Project could therefore be subject to strong seismic ground shaking during construction or operation due to activity on nearby local and regional faults. However, the structures would be designed and constructed in compliance with mandatory structural design criteria, including the California Building Code and the seismic compliance requirements of Senate Bill 1953 for hospital facilities; therefore, impacts related to strong seismic ground shaking are expected to be less than significant.

The Project site is in a previously developed area, and the topsoil at the site has already been disturbed and compacted by previous grading and construction activities. During construction, implementation of standard construction best management practices (BMPs) and a Storm Water Pollution Prevention Plan (SWPPP) for sediment and erosion controls would minimize the potential for erosion. The Project would be required to comply with



erosion control regulations in the City's Grading Ordinance and National Pollution Discharge Elimination System (NPDES) permit requirements protecting water quality from sedimentation effects. Post-construction BMPs, including landscaping, would be implemented to prevent long-term erosion from the site. Therefore, impacts related to soil erosion or the loss of topsoil would be less than significant.

As mentioned above, the Project site is located within Geologic Hazard Zone 52 of the City's Seismic Safety Study Maps, which indicates low geologic risk. In addition, the Geotechnical Investigation found that the potential for liquefaction, seismic-related settlement, expansive soils, lateral spreading, landslides, and slope instability are low based on underlying geologic formations and site topography. While on-site artificial fill materials may be compressible, the Project would implement recommendations of the Geotechnical Investigation and perform remedial grading of these soils. As such, impacts would be less than significant.

Based on the foregoing analysis and information, there is no evidence that the Project would require a major change to the previous environmental documents. The Project would not result in any new significant impact or substantially increase the severity of impacts identified in the previous environmental documents.

## **Historical Resources**

### *Prior Environmental Reviews*

The prior environmental reviews found that the site was either developed or disturbed and located outside of the City's mapped historical resources sensitivity area. Also, no archaeological resources were identified in the area. Therefore, the improvements would not result in alteration of or destruction of a prehistoric or historic archaeological site; adverse physical or aesthetic effects to a prehistoric or historic building, structure, object, or site; adverse physical or aesthetic effects to an architecturally significant building, structure, or object; an impact to existing religious or sacred uses within the potential impact areas; or the disturbance of human remains, including those interred outside of formal cemeteries. No potential for significant environmental impacts was identified.

### *Project*

The SMMC contains multiple buildings that are greater than 45 years in age. The buildings were reviewed by the City for their potential as historic resources, in accordance with SDMC Section 143.0212. In January 2022, the City determined that the buildings were not eligible for designation under City Historical Resources Board criteria, and, therefore, are not considered a historical resource for purposes of CEQA. The Project would therefore not result in impacts to historical resources. No known or recorded archaeological resources are within the Project area. In addition, the Project site has been subjected to previous disturbances, with the SMMC having been previously graded and developed. Therefore, no impacts to historical or archaeological resources would result from implementation of the Project.

Based on the foregoing analysis and information, there is no evidence that the Project would require a major change to the previous environmental documents. The Project would not



result in any new significant impact or substantially increase the severity of impacts identified in the previous environmental documents.

### **Human Health/Public Safety/Hazardous Materials**

#### *Prior Environmental Reviews*

The prior environmental reviews found that the hospital is under permit (Permit No. 114292) with the County of San Diego Department of Environmental Health, Hazardous Materials Management Division, and that through a Unified Program Facility Permit the hospital is permitted for the handling of infectious, biomedical, and chemical-related wastes. The improvements would therefore not create a new health hazard related to these types of wastes. Demolition of existing structures could result in exposure to asbestos from removal and disposal of asbestos containing materials. An asbestos survey and abatement plan was completed in 1991 by Design for Health, Inc. for the entire SMMC. The survey identified the building structures and components within SMMC that contained asbestos and specified methods of removal and/or encapsulation of asbestos-containing materials. The improvements would be required to comply with all applicable local and state regulations, including Occupational Safety and Health Administration (OSHA) 29 Code of Federal Regulations (CFR) 1926.1101, "Safety and Health Regulations for Construction – Asbestos," to minimize potential risks to human health and the environment. The environmental issue would be regulated by Cal-OSHA, California Environmental Protection Agency (Cal-EPA), SDAPCD, and the County of San Diego Department of Health Services to ensure that toxic materials create no hazards to the demolition crew, adjacent residences, or other individuals. The issuance of demolition/removal permits by the City would require completion of a General Application (DS-3032) and a Hazardous Materials Questionnaire (DS-3163). In accordance with the Land Development Code, a demolition/removal permit would not be issued until a decision has been made by the appropriate decision maker concerning approval of the project's discretionary permits. Overall, implementation of these conditions associated with the demolition/removal permit would reduce the potential human health/public safety impacts to below a level of significant and no additional mitigation would be required.

The improvements would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. No potential for significant environmental impacts was identified.

#### *Project*

During construction, routine hazardous materials, such as oil, gas, and diesel fuel from construction equipment, would be used and transported throughout the Project area. No hazardous materials are expected to be used for the Project beyond existing conditions once construction is complete. The construction contractor would prepare and implement a spill prevention, control, and countermeasures plan for construction. Compliance with regulatory requirements would reduce potential impacts associated with the use, transport, and disposal of hazardous materials to less than significant levels.



The State Water Resources Control Board GeoTracker database (State Water Resources Control Board 2023) and the California Department of Toxic Substances Control EnviroStor database (California Department of Toxic Substances Control 2023) were reviewed and did not include listed open or active hazardous materials sites at the SMMC. As identified in the previous environmental documents, demolition of existing buildings could result in exposure to asbestos-containing materials. Asbestos-containing materials, if present, would be assessed and properly remediated and disposed of in accordance with State and federal regulation prior to and during demolition. No other recognized environmental conditions are anticipated to be encountered during implementation of the Project. Therefore, the Project would not create a hazard though upset or accident involving the release of hazardous materials from a known site. If currently unknown hazardous materials are encountered, contaminated material would be removed and disposed of in accordance with applicable federal, State, and local regulations. Therefore, impacts would be less than significant.

The Project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

Based on the foregoing analysis and information, there is no evidence that the Project would require a major change to the previous environmental documents. The Project would not result in any new significant impact or substantially increase the severity of impacts identified in the previous environmental documents.

## **Hydrology/Water Quality**

### *Prior Environmental Reviews*

The prior environmental reviews found that improvements would not result in increases in discharges since the site is already developed. Changes in discharge patterns would be accommodated by new on-site stormwater drainage facilities, as necessary. During construction, a SWPPP would be prepared to comply with NPDES requirements. The SWPPP would include appropriate erosion and sediment controls, periodic and storm-related inspection procedures during the wet and dry seasons, general housekeeping practices, training, and materials management. The SWPPP would prevent contaminated runoff from leaving the construction site through the existing storm drain system via implementation of BMPs, including slope stabilization, stockpile controls, gravel bags, fiber rolls, inlet protection devices, and sediment traps.

To address potential post-construction water quality impacts, appropriate structural BMPs would be implemented to address anticipated pollutants of concern, including sediment, nutrients, oxygen demanding substances, heavy metals, oil and grease, and pesticides. Structural BMPs would include stormceptors equipped with fossil filters, roof drains directed to the storm drain system, and pervious material, where practical. As such, the improvements would not result in an increase in pollutant discharges (including to an impaired water body), an increase in runoff, substantial changes in flow rates or volumes, an adverse impact on groundwater quality, or an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses. No potential for significant environmental impacts was identified.



## *Project*

The results of the Master Drainage Study (BWE 2022) prepared for the Project are incorporated into this analysis.

The Project is in an urban area serviced by municipal storm drains. According to the Master Drainage Study prepared for the Project, the Project would create slightly more impervious surface compared to the existing condition, resulting in an increase in the total peak 100-year flow rate from 49.65 cubic feet per second (cfs) to 50.91 cfs. However, new stormwater management features, including detention basins and biofiltration basins, would be installed at the site to capture, treat, and attenuate stormwater runoff. Stormwater collected by these features would then be discharged to existing and/or proposed on-site storm drains. With the inclusion with these stormwater management features, the total peak 100-year flow rate would be 23.33 cfs, less than the existing condition. In addition, while the existing drainage pattern would be slightly altered, runoff would continue flowing in the same general direction as in the existing condition and existing runoff discharge points would be maintained. As such, the Project would not result in a permanent adverse effect on the quality or quantity of stormwater runoff.

The Project would disturb greater than one acre of land and would therefore require compliance with the NPDES Construction General Permit and preparation and implementation of a SWPPP. During construction, implementation of standard construction BMPs and a SWPPP for sediment and erosion controls would reduce or eliminate sediment and other pollutants in stormwater and non-stormwater runoff from the Project area. The Project would be required to comply with all erosion control regulations in the City's Grading Ordinance and NPDES permit requirements protecting water quality from sedimentation effects. Although soil disturbance would be required during construction, compliance with local and State regulations related to stormwater and erosion control would ensure no substantial effects to downstream receiving water.

With implementation of the aforementioned permanent stormwater drainage system and temporary BMPs during construction, the Project would not result in an increase in pollutant discharges (including to an impaired water body), an increase in runoff, substantial changes in flow rates or volumes, an adverse impact on groundwater quality, or an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses. Impacts would be less than significant.

Based on the foregoing analysis and information, there is no evidence that the Project would require a major change to the previous environmental documents. The Project would not result in any new significant impact or substantially increase the severity of impacts identified in the previous environmental documents.

## **Land Use**

### *Prior Environmental Reviews*

The prior environmental reviews found that the improvements would be consistent with the institutional land use designation within the Serra Mesa Community Plan area and the



underlying zone of CO-1-2, which permits hospitals, intermediate care facilities, and nursing facilities. The site is not within or adjacent to MHPA or an airport land use compatibility plan and would therefore not conflict with such plans. The improvements would not physically divide an established community. No potential for significant environmental impacts was identified.

#### *Project*

The Project involves improvements to the existing SMMC. The Project would not conflict with the goals, objectives, and recommendations in the Serra Mesa Community Plan, which identifies the site as within the health-institutional complex, and states that new proposals for hospital complex improvements should be accommodated since they are a major activity with substantial public service and employment resources to Serra Mesa and the City (Serra Mesa Community Planning Group and City of San Diego Planning Department 2011). The Project site currently contains hospital facilities, and the surrounding area consists of mostly medical or commercial land uses; therefore, the Project would not result in inconsistency with surrounding uses or the division of an established community.

The Project would require a CUP amendment that would allow for the continuation of hospital uses within a commercial zone. With the CUP amendment, the Project would not result in a change in land use that would conflict with the City zoning ordinance. The Project would also require a PDP amendment that would allow deviations from the CO12 zone building height limit of 60 feet for heights ranging between approximately 122 and 139 feet for the new hospital tower and between approximately 83 and 90 feet for the Mary Birch Expansion. These deviations would not be inconsistent with the Serra Mesa Community Plan designation of the site as a health-institutional complex.

The Project site is not located within or adjacent to MHPA or within an airport land use compatibility plan. Land use-related impacts would be less than significant.

#### **Noise**

##### *Prior Environmental Reviews*

The prior environmental reviews found that the improvements would result in temporary increases in noise during construction but that they would not expose people to noise levels which exceed the City's adopted noise ordinance. The improvements would also not result in the exposure of people to current or future transportation noise levels which exceed standards established in the Transportation Element of the General Plan or an adopted Airport Comprehensive Land Use Plan. No potential for significant environmental impacts was identified.

#### *Project*

The results of the Acoustical Analysis Report and Addenda (HELIX 2021b, HELIX 2023) prepared for the Project are incorporated into this analysis.



The Acoustical Analysis Report and Addenda assessed potential construction noise impacts to both on-site sensitive receptors (patients) and off-site sensitive receptors (patients) located at the Nelson Pavilion at Rady Children's Hospital, adjacent to the Project site. Potential noise impacts were considered for both demolition of existing structures and construction of new structures proposed as part of the Project. Project construction noise from demolition, site preparation (e.g., clearing and grubbing), grading/excavation, building construction, and paving would not result in noise levels above the City's noise ordinance construction noise threshold of 75 A-weighted decibel (dBA  $L_{EQ}$ ; 12-hour) measured at the nearest off-site noise-sensitive land uses (NSLUs). Groundborne vibration impacts from construction would not exceed thresholds for annoyance of nearby building occupants or exceed thresholds for structural damage to nearby buildings.

Noise levels were conservatively estimated for equipment operating at the closest portion of proposed work areas to the Nelson Pavilion. Additionally, the noise level estimates conservatively did not consider intervening structures located between proposed Project work areas at the Nelson Pavilion that would act as a partial barrier to the construction noise. The analysis determined that noise levels from Project construction would not exceed the 75 A-weighted decibel (dBA) 12-hour average noise level ( $L_{EQ}$  [12-hour]) standard set forth in the SDMC.

As mentioned above, noise levels from Project construction were determined to be below the applicable 75-dBA  $L_{EQ}$  (12-hour) standard, assuming construction would occur at the closest portion of work areas to the off-site sensitive receptors (a distance of approximately 200 feet) and not considering the presence of structures located between the Project's work areas and off-site receptors. However, in practice, most construction equipment would likely move around the site and occur at distances greater than 200 feet from the Nelson Pavilion. In addition, structures located between Project work areas and the Nelson Pavilion, including the Frost Street Parking Garage, MRI Building, Central Energy Plant Building, and Rady Children's Hospital: Education Office Building, would act as barriers blocking some Project-generated construction noise from reaching Nelson Pavilion, thus providing substantial noise attenuation at these off-site sensitive receptors. Distance combined with intervening structures would result in Project-generated noise levels much reduced from those conservatively presented in the Acoustical Analysis Report. Such noise levels are not anticipated to result in a 3-dBA increase (which is considered a perceptible increase and occurs from a doubling of sound energy) at sensitive receptors at the Nelson Pavilion over the more localized construction noise generated by the improvements proposed at Rady Children's Hospital. Furthermore, hospital patient facilities (where sensitive receptors are located) are enclosed buildings (i.e., windows cannot be opened) of steel and concrete construction that provide significant reduction (15 dBA minimum) in exterior-to-interior noise. As such, the proposed Project would not substantially contribute to a cumulative construction noise impact at off-site sensitive receptors located at Rady Children's Hospital.

Groundborne vibration impacts from construction would not exceed thresholds for annoyance of nearby building occupants or exceed thresholds for structural damage to nearby buildings.

Long-term on-site operational noise from the Project's operational equipment (heating, ventilation, and air conditioning units, exhaust fans, generators, boilers, chillers, and water



pumps) would not exceed the City noise ordinance thresholds at nearby land uses. The Project would not increase traffic as compared to existing conditions, so the Project's traffic noise contribution would be less than significant.

The Project site would be located in areas that would exceed 65 Community Noise Equivalent Level (CNEL), which would be above what is considered "conditionally compatible" for Institutional hospital land uses as defined in the City General Plan Noise Element. However, the Project does not propose exterior use areas that would be subject to these standards. Interior noise levels would be attenuated by the Project's construction materials, which are anticipated to attenuate exterior noise levels by up to 30 CNEL. This would reduce interior noise levels to below the 45 CNEL requirements. No mitigation measures or land use noise compliance measures would be required. Noise-related impacts from implementation of the Project would therefore be less than significant.

Based on the foregoing analysis and information, there is no evidence that the Project would require a major change to the previous environmental documents. The Project would not result in any new significant impact or substantially increase the severity of impacts identified in the previous environmental documents.

## **Paleontological Resources**

### *Prior Environmental Reviews*

The prior environmental reviews found that the site is underlain by the Lindavista geologic formation, which has produced diverse fossil assemblages of marine invertebrates and terrestrial vertebrates and has been assigned a moderate resources potential for fossils. Grading quantities and depths associated with the proposed improvements would exceed the City's thresholds of significance for potential impacts to paleontological resources. Disturbance or loss of fossils without adequate documentation and research would be considered a significant impact. Therefore, mitigation (as presented above in Section III) would be implemented. The mitigation would require a qualified paleontologist or paleontological monitor to be present during ground excavations that could impact portions of the previously undisturbed Lindavista formation. If paleontological resources are discovered, a recovery and documentation program would be implemented. With implementation of the mitigation, impacts to paleontological resources would be below a level of significance.

### *Project*

The City's CEQA Significance Threshold Guidelines indicate that grading greater than 2,000 cubic yards and cutting greater than 10 feet in depth in a moderately sensitive formation may constitute a significant impact to paleontological resources. While the Project is expected to require 11,300 cubic yards of grading and occur in the Lindavista formation, which is considered moderately sensitive for paleontological resources, the Project would not require cutting greater than 10 feet in depth. Therefore, the Project would not have the potential to result in significant impacts to paleontological resources and no mitigation is required.



Based on the foregoing analysis and information, there is no evidence that the Project would require a major change to the previous environmental documents. The Project would not result in any new significant impact or substantially increase the severity of impacts identified in the previous environmental documents.

## **Population and Housing**

### *Prior Environmental Reviews*

The prior environmental reviews found that based on the uses proposed, the improvements would not induce substantial population growth in the area either directly or indirectly. The improvements would also not displace existing housing or necessitate the construction of replacement housing elsewhere. The improvements would not alter the planned location, distribution, density, or growth rate of the population of the area. No potential for significant environmental impacts was identified.

### *Project*

The Project would not include construction of new residential dwellings or require the extension of roads or other infrastructure that could indirectly induce population growth. Construction workers would be temporary and would be drawn from the existing labor pool in the region. Staffing increases as a result of the Project (if any) would be minimal and would not induce substantial population growth. Therefore, the project would not result in substantial population growth. The Project would also not displace existing housing. No impacts would occur.

Based on the foregoing analysis and information, there is no evidence that the Project would require a major change to the previous environmental documents. The Project would not result in any new significant impact or substantially increase the severity of impacts identified in the previous environmental documents.

## **Public Services**

### *Prior Environmental Reviews*

The prior environmental reviews found that the site is currently serviced for fire protection, police protection, and public facility maintenance. In addition, the prior environmental reviews found that the improvements would not affect school services, parks or other recreational facilities, or governmental services. Therefore, the improvements would not result in substantial adverse physical impacts associated with the provision of 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 these public services. No potential for significant environmental impacts was identified.



### *Project*

The Project would not create additional demand for fire protection services, police services, or public facilities beyond existing conditions and would therefore not require the construction of new or expanded governmental facilities. The Project would not result in impacts related to schools or parks because it would not result in an increase in population that would use such facilities. As such, no impacts relate to public services would occur.

Based on the foregoing analysis and information, there is no evidence that the Project would require a major change to the previous environmental documents. The Project would not result in any new significant impact or substantially increase the severity of impacts identified in the previous environmental documents.

### **Recreational Resources**

#### *Prior Environmental Reviews*

The prior environmental reviews found that the improvements, as hospital-related facilities, would not increase 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. The improvements also would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. No potential for significant environmental impacts was identified.

### *Project*

The Project includes improvements at the SMMC and would not increase the use of existing neighborhood and regional parks or other recreational facilities that would accelerate or result in the substantial physical deterioration of parks and recreational facilities. It would also not include recreational facilities or require the construction or expansion of recreational facilities that would pose an adverse physical effect on the environment; therefore, no impact would occur.

Based on the foregoing analysis and information, there is no evidence that the Project would require a major change to the previous environmental documents. The Project would not result in any new significant impact or substantially increase the severity of impacts identified in the previous environmental documents.

### **Transportation/ Circulation**

#### *Prior Environmental Reviews*

The prior environmental reviews analyzed traffic using the LOS metric and found that improvements would result in significant traffic circulation impacts at multiple intersections and roadway segments in the vicinity of the site from the addition of vehicle trips. As mitigation, numerous improvements to the transportation system were required, as detailed above in Section III, to avoid significant impacts to the transportation system. It was determined that improvements would not substantially affect parking, increase traffic



hazards for motor vehicles, bicyclists, or pedestrians, or conflict with adopted policies, plans, or programs supporting alternative transportation models.

#### *Project*

During construction, the Project may cause temporary impacts to the transportation system due to construction activities on or adjacent to roadways and as a result of construction worker trips and deliveries of equipment and supplies. However, these temporary impacts would be minimal, and the effects on the transportation system would be negligible. The effects of construction on traffic would be further reduced with the implementation of a traffic control plan as required by the City (if determined to be necessary).

A VMT for the project analysis was not required since the project demonstrated consistency with the Transportation conclusions of the Long Range Plan for Expansion and Improvement (LRPEI) EIR (SCH #90010436; 03/16/1995). A transportation analysis memo prepared by Linscott, Law & Greenspan Engineers (2023) demonstrated consistency with the LRPEI EIR. The Project would result in a decrease in average daily traffic, but an increase in AM and PM peak hour traffic, in association with a net reduction of 113 beds and addition of office space that would occur from the Project. As such, the supplemental analysis concluded that the Project would not result in additional traffic impacts or exacerbate previously identified traffic impacts to the existing circulation system. The Project would also not increase traffic hazards or conflict with adopted plans, policies, or programs supporting alternative transportation models. The required off-street parking for the Project at buildout for this Transit Priority Area is 2,764 spaces. At buildout a total of 4,056 off-street parking spaces would be provided. No parking-related impacts would occur.

Based on the foregoing analysis and information, there is no evidence that the Project would require a major change to the previous environmental documents. The Project would not result in any new significant impact or substantially increase the severity of impacts identified in the previous environmental documents.

### **Utilities**

#### *Prior Environmental Reviews*

The prior environmental reviews found that existing natural gas, communications systems, water, sewer, and solid waste disposal utilities would be either be sufficient to serve the improvements or would not be required for the improvements. Therefore, the improvements would not result in a need for new systems related to these utilities or alterations to the existing utilities. Construction of a partial storm water drainage system would comply with City regulations. No potential for significant environmental impacts was identified.

#### *Project*

The results of the Water Study (Mission Consulting Services 2022), Sewer Study (Mission Consulting Services 2023), Master Drainage Study (BWE 2022), and Waste Management Plan (HELIX 2021c) prepared for the Project are incorporated into this analysis.



The Project would not require substantial changes to existing natural gas or communications system lines at the site. Several new water pipelines would be constructed at the site to separate the existing water system into two systems, one for fire and one for domestic and irrigation systems, and to eliminate pipelines under new buildings. The proposed system would allow for fire flows to be within acceptable criteria and would support the ultimate conditions proposed by the Project. No additional or off-site improvements would be necessary (Mission Consulting Services 2022). In addition, the City determined that sufficient water supplies are available to serve the Project. Similarly, new on-site sewer infrastructure, including a new pump station and new force main that would connect to the existing City-owned 15-inch main located within the SMMC, would be constructed. With these improvements, the on-site private sewer system and downstream reaches of the City's existing system would have adequate capacity to serve the Project (as well as the additional flow from Rady Children's Hospital improvement project to the east). The system proposed would support the ultimate conditions proposed by the Project and no additional new or expanded off-site improvements are necessary (Mission Consulting Services 2023). As discussed above under Hydrology/Water Quality, the Project would also include improvements to storm drain systems (BWE 2022). The improvements would be within the site and would not result in additional off-site impacts. Impacts associated with natural gas, communication systems, water, sewer, and storm drainage utilities would be less than significant.

Solid waste generated during construction and demolition would be collected, handled, transported, and disposed of consistent with applicable federal, State, and local regulations. Hazardous wastes would also be collected, handled, transported, and disposed of consistent with applicable federal, State, and local regulations and would not be comingled with general construction wastes. The Project would be designed to source-reduce and/or recycle 75 percent of construction waste. Operation of the Project would be in compliance with the SDMC Chapter 6 Article 6: Collection, Transportation and Disposal of Refuse and Solid Waste, Division 7: Recycling Ordinance, as well as applicable California Department of Resources Recycling and Recovery (Cal Recycle) rules related to organic waste recycling. The Project would incorporate measures to ensure that the solid waste generated during operations would be properly managed and that the City's solid waste services would not be significantly impacted. The measures to reduce the Project's direct and cumulative impacts from solid waste are identified in the Project-specific Waste Management Plan (HELIX 2021c). Therefore, impacts related to solid waste would be less than significant.

Based on the foregoing analysis and information, there is no evidence that the Project would require a major change to the previous environmental documents. The Project would not result in any new significant impact or substantially increase the severity of impacts identified in the previous environmental documents.

## **Water Conservation**

### *Prior Environmental Reviews*

The prior environmental reviews found that the improvements would not require the use of excessive amounts of water. Landscaping would predominately be drought-resistant



vegetation in compliance with the San Diego Landscape Technical Manual. No potential for significant environmental impacts was identified.

#### *Project*

The Project would comply with HCAI requirements for health care facilities. HCAI is the enforcing agency for building permits and applicable California Green Building Standards Code compliance for the Project. The Project would follow the City's Climate Action Plan Strategy 1 limits for fixture flow rates in public spaces and follow HCAI requirements for plumbing fixtures in the clinical spaces. Project landscaping and associated water use would be consistent with City requirements. Impacts would be less than significant.

Based on the foregoing analysis and information, there is no evidence that the Project would require a major change to the previous environmental documents. The Project would not result in any new significant impact or substantially increase the severity of impacts identified in the previous environmental documents.

### **Mandatory Findings of Significance**

#### *Prior Environmental Reviews*

The prior environmental reviews found that significant impacts could occur to paleontological resources and transportation/circulation from implementation of improvements. Mitigation would reduce the severity of these impacts to a less-than-significant level. The improvements would not have the potential to achieve short-term, to the disadvantage of long-term, environmental goals. Compliance with mitigation measures would be required to reduce cumulative impacts to below a level of significance. The improvements would not have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly.

#### *Project*

The Project site is currently developed. Implementation of the Project would therefore not degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. Because there are no known historical resources at the site and the Project would not have potential to significantly impact paleontological resources based on the anticipated depth of grading, the Project would not eliminate important examples of the major period of California history or prehistory. The Project is also not anticipated to contribute to potentially significant cumulative environmental impacts since construction would be temporary and operations would not result in a substantial change from existing conditions. Through compliance with applicable federal, State, and local regulations, the Project would not result in substantial adverse impacts on human beings. Therefore, impacts would be less than significant.

Based on the foregoing analysis and information, there is no evidence that the Project would require a major change to the previous environmental documents. The Project would not



result in any new significant impact or substantially increase the severity of impacts identified in the previous environmental documents.

**VI. MITIGATION, MONITORING, AND REPORTING PROGRAM (MMRP) INCORPORATED INTO THE PROJECT**

None required.

**VII. IMPACT SIGNIFICANCE**

The previous environmental documents identified that all impacts would be mitigated to below a level of significance through mitigation. This Addendum identifies that impacts associated with the Project would be below a level of significance, consistent with the previously certified environmental documents.

**VIII. CERTIFICATION**

Copies of the addendum, the adopted MND(s), the MMRP, and associated project-specific technical appendices, if any, may be accessed on the City's CEQA webpage at <https://www.sandiego.gov/ceqa/final>.

*Courtney Holowach*  
Courtney Holowach, Senior Planner  
Development Services Department

5/4/23  
Date of Final Report

Analyst: Courtney Holowach

**Attachments:**

- Figure 1: Regional Location
- Figure 2: Project Vicinity (Aerial Photograph)
- Figure 3: Overall Site Plan



## IX. REFERENCES

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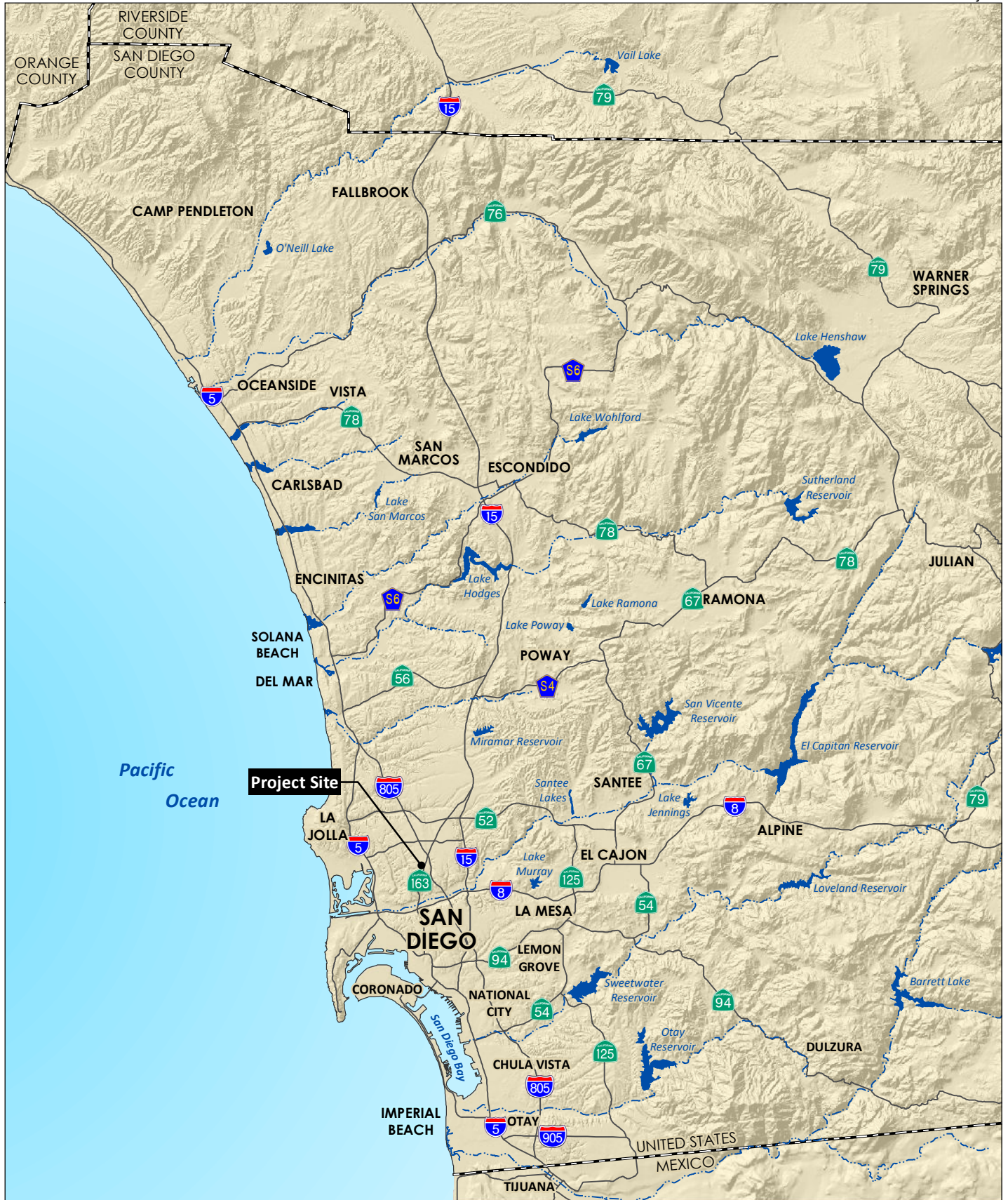
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# Regional Location

Figure 1

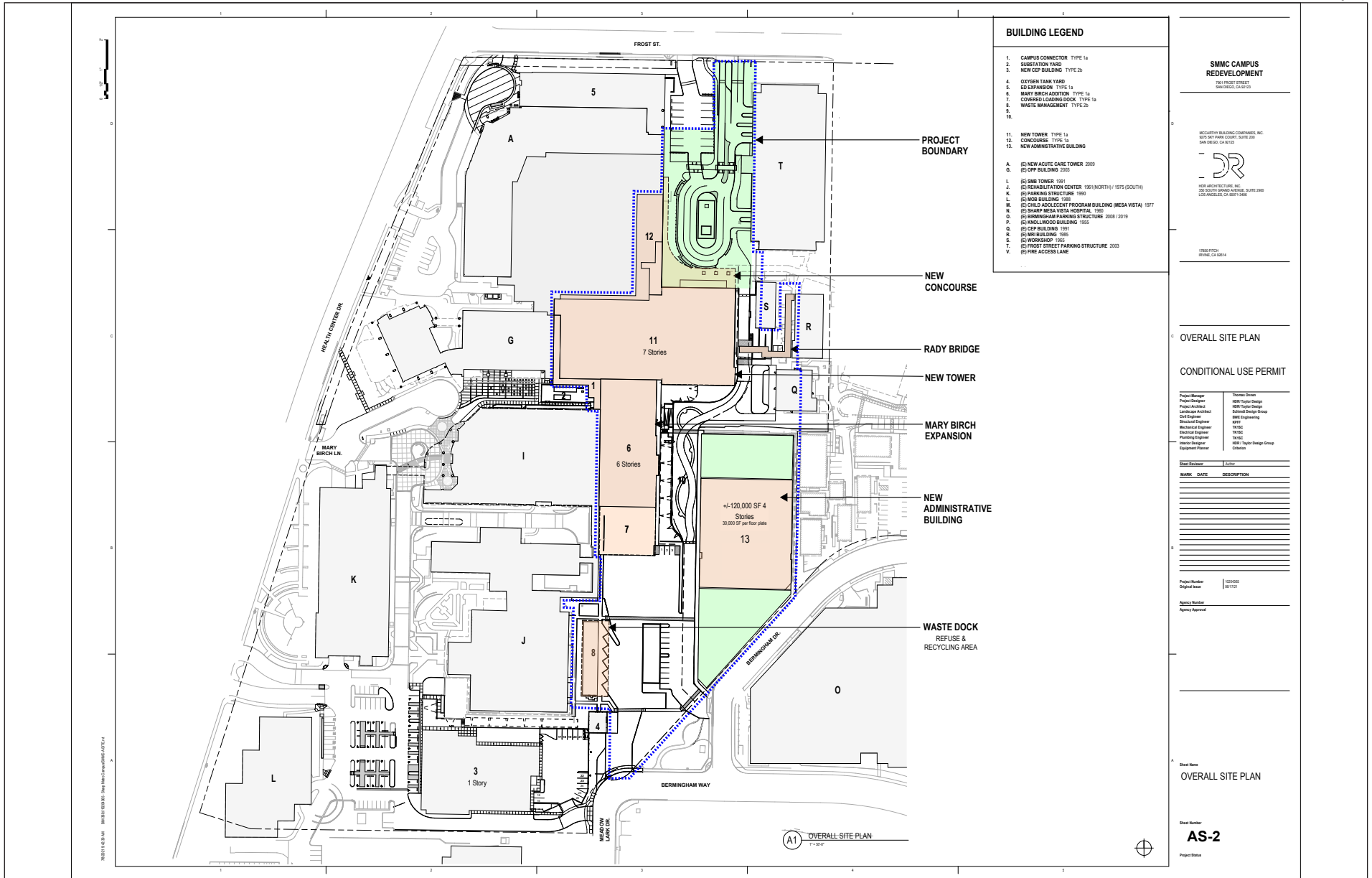




**Project Vicinity (Aerial Photograph)**

Figure 2





Source: Sharp Healthcare, 2021

**Overall Site Plan**  
Figure 3