I. PROJECT DESCRIPTION

The proposal consists of the subdivision of two parcels to create four (4) legal lots. New lots would range in size from 20,374 square feet to 50,491 square feet. Three of the new parcels will contain the four existing single-family residences. The fourth parcel (Parcel D) is not proposed to be developed at this time. The project includes 235 cubic yards of grading to realign and widen the existing private driveway, constructing new driveways for Parcels B and C, constructing a carport on Parcel B, creating a Development Envelope for the future development of Parcel D, proposed infiltration basins, oak tree replacement, undergrounding existing utilities, and a new residential type fire hydrant. The project is subject to recommendations of the City’s Pedestrian Master Plan (PMP) calling for a sidewalk and parkway frontage improvements along Medcliff Road. The project site is in the Hillside Design District and the Appealable Jurisdiction of the Coastal Zone.

II. REQUIRED APPLICATIONS

The discretionary applications required for this project are:

1. Modifications (two) to allow two of the newly created lots to have no frontage on a public street instead of the required 60 feet (SBMC §28.15.080);

2. A Public Street Frontage Waiver to allow a subdivision creating lots without public street frontage to be served in this case by a private shared driveway, which serves more than two (2) lots (SBMC §22.060.300);

3. A Tentative Subdivision Map (TSM) to allow the division of two (2) parcels into four (4) lots (SBMC Title 27.07);

4. A Coastal Development Permit (CDP2008-00013) to allow the proposed development in the appealable jurisdiction of the City’s Coastal Zone (SBMC §28.44.060);

IV. **SUBSTANTIAL CONFORMANCE**

The Community Development Department staff is responsible for making substantial conformance determinations, and depending on the scope of the request, this can occur with or without Planning Commission's input. The applicant requested a Level 4 Substantial Conformance Determination, which requires formal input from the Planning Commission because although Staff is inclined to grant this request, we feel that the Planning Commission's input is necessary in order to make the determination.

<table>
<thead>
<tr>
<th>Permitted</th>
<th>Proposed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Main Hospital</td>
<td>745,480 net s.f.</td>
</tr>
<tr>
<td>Parking Spaces</td>
<td>1,372 spaces</td>
</tr>
</tbody>
</table>

The proposed project revision would meet the General Acute Care Hospital Facility land use requirements specified in SP-8 Hospital Zone (SBMC§28.49) and the General Plan.

The proposed project is an approximately 1.4% increase in square footage over the previously approved and permitted project. The project area is located in Land Use Area A, which is identified as the General Acute Care Hospital Facility and is located between Oak Park Lane on the west, Junipero Street on the north, Bath Street on the east and Pueblo Street on the south.

SBCH proposes additional basement storage area for the purposes of storing the increased emergency provisions that are now required under national and state regulations, to enable the hospital to sustain operations for 96 hours in the event of a disaster. A memorandum from SBCH Facilities Management Department dated January 2010 is included as an attachment to Exhibit C. The memorandum documents the space allocation requirements for each identified supply and/or equipment required to meet both state and federal requirements.

Although the SCD request is for the additional construction of 10,600 square feet in the basement, the only real change is a reduction in the amount of grading. The approved project included over excavation in the area of the proposed basement, which was required as part of the foundation of the building, with the subsequent filling of the area with dirt so that the area was not useable. The proposed basement addition would simply eliminate the 5,500 cubic yards of imported fill that was approved as part of the previous project, thus reducing the short-term construction impacts by reducing the total number of required truck trips that would have been required for imported soil. Staff requests the Commission's input on whether the proposal substantially conforms to the approved project.

V. **ISSUES**

A. **DESIGN REVIEW**

This proposed basement expansion project would not require review by the Architectural Board of Review because the improvements are subterranean. The proposed project does not affect the approved elevations of the project or site planning. The proposal will not increase the
finished height of the building, change the building footprint or increase the approved buildings mass, bulk and scale.

B. ENVIRONMENTAL REVIEW

A Final Environmental Impact Report (EIR) identified significant but mitigable impacts and a significant unavoidable impact related to long-term transportation and circulation impacts created by the approved project. Pursuant to CEQA, the Planning Commission adopted the EIR for this project on March 24, 2005. Each of the adopted required mitigation measures outlined in the EIR were incorporated into the proposed conditions of project approval in PC Resolution No. 020-05 attached as Exhibit A. Each mitigation is being implemented as outlined in the adopted mitigation monitoring and report program that was attached to the final EIR to ensure their compliance during project implementation (PRC Sec.21081.6).

Traffic & Parking

The approved project traffic impacts were analyzed in the adopted EIR. The proposed basement expansion has been reviewed by the Transportation Division Staff and who has determined that the project does not contribute to any additional traffic and circulation impacts.

The parking ordinance requires one parking space per sleeping unit for hospital uses. During the review of the permitted project, a parking demand study was prepared and incorporated into the EIR in order to determine the actual parking demand. The parking demand determined that based on the number of patients, number of employees, and types of services provided the parking would be greater than the number of beds proposed for the hospital. Based on the additional square footage use as storage only, Transportation Staff determined that no additional parking would be required.

Grading & Archaeological

The location of the proposed basement expansion is an area that has been previously disturbed by the approved construction. No additional cut would be required, however; there will be a decrease of required fill by approximately 5,500 cubic yard. The decrease in required fill will reduce the number of required truck trips needed to transport imported fill from an off-site location. Although discovery of archaeological artifacts is not anticipated, the MMRP has outlined mitigations measures that were incorporated into the resolution as conditions of approval. Conditions for unanticipated discovery of artifacts during grading activities are identified in Resolution No. 020-05.

An addendum to the EIR has been prepared to document that the project revisions will not cause additional impacts and reduces grading impacts.

C. DEVELOPMENT PLAN APPROVAL/SQUARE FOOTAGE ALLOCATION

On May 20, 2003, the City Council granted the SBCH project a dual designation of Community Priority and Economic Development, with a preliminary allocation of 140,000 s.f. from the Economic Development category.
Although, the SBCH upgrade and modernization project clearly met the definition of both a Community Priority and Economic Development project, due to the shortage of Community Priority square footage, City Council allocated the Development Plan Approval square footage from the Economic Development category. In 2005, the SBCH project requested an increase to the preliminarily approved allocation by 42,541 s.f., primarily in association with a previous request to expand the basement to accommodate the Hospital’s storage requirements. Council approved an allocation of 182,541 s.f. from the Economic Development category on March 24, 2005.

If the Substantial Conformance Determination were to be granted, Staff would recommend that the allocation of 10,600 s.f. for the basement storage area be made from the Economic Development category under a dual designation as Economic Development and a Community Priority, due to the limited amount of Community Priority square footage available. The resulting total allocation will be for the approved SBCH project and SCD project would be 193,141 s.f. (182,541 s.f. + 10,600 s.f.) from the Economic Development category under a dual designation as Economic Development and Community Priority.

This seems like a large amount of square footage for a single development. However, it is important to note that SBCH agreed to transfer approximately 158,862 s.f. of Existing Commercial Development Rights square footage back into the Economic Development category bank as part of the approval of the St. Francis residential project. Additionally, a previous St. Francis Medical Center project had 30,000 s.f. allocation of Community Priority square footage that was returned to the City because of the expiration of the approval for the project. One could argue that overall, SBCH is only requesting a little over 4,000 s.f. from the City.

VI. NEXT STEPS

Staff will make the decision to approve or deny the substantial conformance, using the input provided by the Planning Commission. If approved, the project will be scheduled on a City Council agenda for preliminary and final square footage allocation of square footage with a dual designation as a Community Priority and Economic Development.

Exhibits:

A. PC Resolution Number 020-05
B. Existing and proposed Basement Plan (under separate cover)
C. Applicant's Substantial Conformance Determination request letter, dated April 8, 2010
D. Addendum to Final EIR (under separate cover)
EXHIBIT A

SANTA BARBARA COTTAGE HOSPITAL (SBCH) PLANNING COMMISSION RESOLUTION 020-05

Please refer to Exhibit B of the SBCH Annual Review Staff Report (the previous item) for a copy of the Planning Commission Resolution dated March 24, 2005 as amended by the City Council on April 26, 2005.
EXHIBIT B

SANTA BARBARA COTTAGE HOSPITAL (SBCH)
EXISTING AND PROPOSED BASEMENT PLANS

A copy of the plans are available for public review at the Planning and Zoning Counter located at 630 Garden Street on the 1st Floor.
Ms. Irma Unzueta  
Community Development Department, Planning Division  
City of Santa Barbara  
630 Garden Street  
Santa Barbara, CA 93101

RE: Santa Barbara Cottage Hospital – Facilities Management Department  
Finding of Substantial Conformance Request for Basement Build Out  
(MST2003-00152)

Dear Ms. Unzueta:

On behalf of the applicant, Santa Barbara Cottage Hospital (SBCH), we are pleased to present the following substantial conformance request:

Background  
On March 24, 2005, (as amended by City Council on April 26, 2005), the Planning Commission approved a Development Plan (Resolution No. 020-05) to allow the addition of new square footage to the existing hospital facility. In accordance with State Senate Bill 1953, which requires the seismic retrofit and/or upgrading of all acute care facilities in the state, the proposal involved the demolition of approximately 283,263 square feet of existing hospital structures and the addition of approximately 472,450 square feet of new hospital structures to include a helipad on the roof of the proposed Diagnostic and Treatment Building. In addition, in order to facilitate the proposed project, the City established a new Hospital Area Specific Plan (SP-8).

Substantial Conformance Request  
A finding of substantial conformance applies to an approved project when a project applicant requests a minor change from the approval. In this instance, the approved project included a basement plan comprised of areas for storage, mechanical and electrical equipment, material management/imen, and a morgue/autopsy room. An existing crawl space area of approximately 10,600 square feet was not intended to be used and, therefore, was not part of the build out plan. However, after careful review and consideration, SBCH proposes to expand the basement into the existing crawl space area in order to comply with the most current standards of best practice for disaster planning. Please see Attachment 1 which is a copy of the approved basement plan and Attachment 2 which is a copy of the proposed basement plan.
In accordance with national and State regulations, hospitals are required to have provisions for 96 hours enabling sustained operations during a disaster. As such, SBCH needs the proposed 10,600 square feet of additional space to store additional medical supplies, personal protective equipment, food, water, non-medical supplies, decontamination equipment, linens, and beds. Please see Attachment 3 for a detailed description and list of items to be stored in the basement expansion.

Because the basement addition will be dedicated to storage use only and will not intensify use of the site, we believe it may qualify for a finding of substantial conformance.

On behalf of the applicant and project team, we thank you for your consideration of this request and ask you to please call us should you have any questions or require additional information.

Sincerely,

SUZANNE ELLEDGE
PLANNING & PERMITTING SERVICES

[Signature]
Suzanne Elledge
Principal Planner

Attachments

Cc: Tom Thomson
Santa Barbara Cottage Hospital
Facilities Management Department
January 2010

Santa Barbara Cottage Hospital is requesting an allowance to build out an additional 10,600 square feet on the basement level. This request for addition of space is necessary to store additional equipment, in accordance with regulatory agencies and in keeping with the most current standards of best practice for disaster planning.

Some items to be stored include patient care equipment that is keeping with the developments in portable medical equipment, ensuring we are able to continue to provide state of the art technology and exceptional patient care. One example is that specialty beds are rented to meet the specific needs of our patients. Other examples are included in the table below. The Center for Medicare/Medical Services (CMS), The Joint Commission (TJC), and the National Fire Protection Agency (NFPA) prohibit hospitals from storing equipment in hallways, thus additional storage for these items is necessary.

In keeping with best practices for disaster planning, Santa Barbara Cottage Hospital intends to extend the extent to which it is able to sustain operations during a disaster. Current national and State regulations require the hospital to have provisions for 72 hours, however national standards implemented in 2008 requires hospitals to have a plan for 96 hours. The hospital expects this new “planning” requirement to turn into mandating actual provisions for 96 hour sustainability. Thus, Santa Barbara Cottage Hospital needs space to store the additional 24 hours worth of medical supplies, personal protective equipment, food, water, non-medical supplies, decontamination equipment, linens, beds, and the like.

<table>
<thead>
<tr>
<th>Description</th>
<th>Dimensions</th>
<th>Approx # of units</th>
<th>Approx. Square Feet</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Patient Care Items</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cribs</td>
<td>72&quot; x 30&quot;</td>
<td>8</td>
<td>120</td>
</tr>
<tr>
<td>Gurneys</td>
<td>76&quot; x 30&quot;</td>
<td>16</td>
<td>284</td>
</tr>
<tr>
<td>Bariatric Specialty Beds</td>
<td>44&quot; x 94&quot;</td>
<td>12</td>
<td>346</td>
</tr>
<tr>
<td>Beds</td>
<td>42&quot; x 96&quot;</td>
<td>30</td>
<td>840</td>
</tr>
<tr>
<td>Portable Safe Pt. Handling Equipment (Total Lift and Sit to Stand Lifts)</td>
<td>24&quot; x 36&quot;</td>
<td>31</td>
<td>186</td>
</tr>
<tr>
<td>In frequently used Specialty Items:</td>
<td>Various</td>
<td>88</td>
<td>1500</td>
</tr>
<tr>
<td>• Surgery</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Trauma</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Case Specific Equipment</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Disaster Equipment &amp; Supplies</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Disaster Medical Supplies</td>
<td>4’ x 4’ pallets</td>
<td>16</td>
<td>258</td>
</tr>
<tr>
<td>• IV Bags</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Syringes</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• GI supplies</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Gauze</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Casting supplies</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Disposable Stethoscopes</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Disaster Medical Supplies</td>
<td>3’ x 5’ rolling cabinets</td>
<td>16</td>
<td>240</td>
</tr>
<tr>
<td>• Includes same items as above, already stored in carts to be moved to disaster treatment area(s).</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Description</td>
<td>Dimensions</td>
<td>Approx # of units</td>
<td>Approx. Square Feet</td>
</tr>
<tr>
<td>------------------------------------------------------</td>
<td>-------------</td>
<td>-------------------</td>
<td>---------------------</td>
</tr>
<tr>
<td>Additional Emergency Food Supplies</td>
<td>4' x 4' pallets</td>
<td>50</td>
<td>800</td>
</tr>
<tr>
<td>Additional Bottled Water Supply</td>
<td>4' x 4' pallets</td>
<td>20</td>
<td>320</td>
</tr>
<tr>
<td>Decontamination Supplies</td>
<td>4' x 4' pallets</td>
<td>18</td>
<td>288</td>
</tr>
<tr>
<td>- 2 Portable Decon showers with accessories (water bladder, gurney conveyor, soap, brushes, trash bags, signs, cones)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Decontamination Level C Powered Air Purifying Respirators</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Decon boots</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Decon Suits</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Decon Batteries &amp; Charging stations</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Personal Protective Equipment for Pandemic</td>
<td>4' x 4' pallets</td>
<td>8</td>
<td>128</td>
</tr>
<tr>
<td>- N-95 Masks</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Surge Capacity</td>
<td>4' x 6' crates</td>
<td>4</td>
<td>96</td>
</tr>
<tr>
<td>- Tents</td>
<td>4' x 4' pallets</td>
<td>4</td>
<td>64</td>
</tr>
<tr>
<td>- Cots</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Evacuation slides to transport patients down stairwells</td>
<td>4' x 4' pallets</td>
<td>6</td>
<td>96</td>
</tr>
<tr>
<td>Housekeeping toiletries, cleaning supplies, medical waste (sharps, pharmaceutical, and chemo waste) containers, trash bags, paper goods</td>
<td>4' x 4' pallets</td>
<td>12</td>
<td>192</td>
</tr>
<tr>
<td>Linens</td>
<td>36&quot; x 66&quot; carts</td>
<td>16</td>
<td>264</td>
</tr>
<tr>
<td>Miscellaneous Emergency Supplies: Engineering Filters, Batteries, Fans, Office Supplies</td>
<td>4' x 4' pallets</td>
<td>44</td>
<td>704</td>
</tr>
<tr>
<td><strong>Equipment Footprint Space</strong></td>
<td></td>
<td></td>
<td><strong>6726</strong></td>
</tr>
</tbody>
</table>

Note, per industry guidelines and the need to have access routes/aisles in between shelves and pallet storage, the storage space for the above noted items would also require approximately 3874 additional square feet of open space. This estimation is 37%, which is conservative based on the industry standard of 45% open space in a storeroom environment, allowing for pallet jack movement.

Thus, the total square footage needed would be approximately 10,600.

Equipment Footprint Space 6726
Open Space for Access/Paths 3874
Total Storage Space 10,600
ADDENDUM

TO A CERTIFIED FINAL ENVIRONMENTAL IMPACT REPORT
COTTAGE HOSPITAL MODERNIZATION PLAN (MST2003-00152)

320 W PUEBLO STREET
(FORMERLY IDENTIFIED AS APNS: 025-102-001; 025-101-001, -005, -022, -024, -025, -026, -

SCH # 2003101075

AUGUST 5, 2010

This Addendum is prepared in accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15164, which provides that an Addendum to an Environmental Impact Report may be prepared under circumstances where only minor changes or additions are necessary to make the prior document adequate for the current project as revised. This Addendum has been prepared to address the substantial conformance determination (SCD) request made by the project applicants on April 8, 2010.

PREVIOUSLY APPROVED ENVIRONMENTAL DOCUMENT

The Santa Barbara Cottage Hospital (SBCH) Environmental Impact Report (FEIR) was certified by the Planning Commission on March 24, 2005. The EIR for SBCH was prepared to evaluate the project’s impact on long-term impacts to air quality, traffic, and noise due to helicopter operations and short-term construction noise impacts.

The overall project analyzed in the FEIR consisted of

The SBCH project described in the FEIR and approved by the Planning Commission on March 24, 2005 was intended to comply with State Senate Bill 1953, which requires the seismic retrofit and/or upgrading of all acute care facilities in the state. The approved project was a modernization plan that included the demolition and reconstruction of the existing acute care hospital facility and construction of several related buildings and structures. In addition to the construction plans the project included approval of a specific plan to give the hospital campus a Hospital Zone (SP-8) which identifies appropriate land uses for the hospital facilities and identifies three land use areas (A, B and C)

PROJECT DESCRIPTION

PROJECT AS DESCRIBED IN THE FEIR

Land Use Area A (General Acute Care Hospital Facility): The project involved the demolition of approximately 283,263 sq. ft. of existing hospital structures; retention of 240,100 sq. ft. of existing hospital facility and the construction of 505,380 net sq. ft. of new hospital structures resulting in a 745,480 net sq. ft. general acute care hospital facility. The acute hospital facility includes a helipad on the roof of the proposed Diagnostic and Treatment Building. The number of licensed beds was reduced from 456 to 337. To allow the new hospital construction,
the project proposed the permanent closure of the 2300 Block of Castillo Street between Pueblo and Junipero Streets.

Parking for the project includes the construction of two new multi-level parking structures and surface parking lots for a total of 1,372 parking spaces and are located in Land Use Areas A, B and C.

**Land Use Area B (Parking and Medical Office Building):** The proposed Knapp parking structure would be located behind the existing medical offices located in the Knapp Building at 2400 Bath Street and would contain approximately 556 parking spaces.

**Land Use Area C (Parking; Child Care Facility):** The proposed Pueblo parking structure would contain approximately 635 parking spaces and would be located at the northeast corner of Pueblo and Castillo Streets. A childcare center (11,813 sq. ft.) consisting of three single story structures would be located adjacent to the Pueblo parking structure.

Construction of the project is expected to take approximately nine years through the year 2013, during which the hospital would remain fully operational.

Primary landscape features for the project include a landscaped garden area at the corner of Pueblo Street and Oak Park Lane, five patient pavilion courtyards, central and western courtyards, and main entry landscaping. Preliminary earthwork quantities for the project include 143,600 cubic yards of cut and 60,500 cubic yards of fill.

The project proposes the establishment of a new Hospital Area Specific Plan (SP-8), intended to provide a hospital-oriented zone and specifies allowable land uses and development standards for three separate areas within the project site. The proposed zone would facilitate the reconstruction of the existing facilities as well future development within the SP-8 zone. A Development Agreement is also proposed to facilitate the nine year construction period and ensure that the project is carried out in a timely manner.

The FEIR identified significant unavoidable (Class I) long-term impacts to air quality, traffic and noise due to helicopter operations and short-term construction noise impacts. No feasible mitigation measures or alternatives were identified that could reduce these impacts to less than significant while still meeting the project objectives. However, mitigation measures were required by the Council as proposed conditions of approval that could lessen impacts to the extent feasible. For more details related to the EIR analysis and mitigation measures, please refer to the Final EIR.

**PROPOSED CHANGES TO APPROVED SBCH (“2010 REVISED PROJECT”)**

On April 10, 2010, the City received a formal request for SCD from the Applicants for proposed changes to the originally Approved SBCH Project. The key changes to the project proposed are as follows:

- Expansion of the approved basement floor area by 10,600 square feet; and
- Reduction in grading quantities primarily through the elimination of 5,500 cubic feet of imported fill.
Addendum to FEIR
Santa Barbara Cottage Hospital Modernization Plan (MST2003-00152)
August 5, 2010
Page 3 of 4

ANALYSIS OF ENVIRONMENTAL CIRCUMSTANCES

Since the time of the FEIR analysis, there have been no substantial changes in environmental conditions on the ground, the status of environmental resources, or the City’s impact evaluation guidelines.

ANALYSIS OF PROJECT IMPACTS AND MITIGATIONS

Summary of Impacts
The previous FEIR for the SBCH Project stated that the project would result in significant unavoidable long-term impacts to air quality, traffic and noise due to helicopter operations and short-term construction noise impacts. No feasible mitigation measures or alternatives have been identified to lessen these impacts to less than significant while still meeting the project objectives. Significant, but mitigable impacts were identified in the areas of cultural, geophysical, hazards, hydrology, public services, transportation and circulation, and visual resources. Several mitigation measures were originally required as conditions of the original approval to lessen impacts to the extent feasible.

The proposed expanded 10,600 square foot basement area was originally proposed for overexcavation. The project revisions would not require new excavation that was not already included in the previously approved project. The expanded 10,600 square foot storage area would simply be built in place of filling the excavated area. This would result in 5,500 cubic yards less fill than originally proposed by the project. The revised project, therefore, would result in a reduction of short-term related construction impacts related to traffic and noise from the originally proposed project.

The proposed basement expansion would not result in additional hazardous material and waste impacts or changes to the approved drainage, topography, or landscaping plans. Additionally, the very small additional public services needed for the extra storage area would be minimal. City transportation staff have also determined that the revised project would not require additional parking as addition of storage space would not create new parking demand.

Potential long-term impacts associated with earthquake ground shaking, liquefaction, settlement, perched groundwater, corrosive soil, oversized rocks, compressible soils, and expansive soils would be the same for the proposed basement as the rest of the previously approved project and would be reduced through foundation design measures and mitigation measures GEO-1 through GEO-3 previously identified that require a corrosion analysis, final geotechnical investigation and geotechnical monitor. Potential temporary for construction-related geophysical impacts associated with slope instability caused by over-excavation, perched groundwater caused by groundwater seepage, and erosion caused by exposed on-site soils would be reduced by previously identified mitigation measures GEO-2 and GEO-4 requiring a final geotechnical investigation and excavation and shoring safety.

All mitigation measures previously approved as special conditions of approval for the original project are also included as special conditions of the subject substantial conformance approval. Therefore, the proposed project revisions will not result in changes or additions of project impacts, previously identified impact significance determinations, or the feasibility of previously identified mitigation measures or alternatives in the FEIR.
CEQA FINDING

Based on the above review of the project, in accordance with State CEQA Guidelines Section 15162, no subsequent MND or Environmental Impact Report is required for the current project, because new information, and changes in circumstances, project description, impacts and mitigations are not substantial and do not involve new potentially significant impacts or a substantial increase in the severity of previously identified impacts, as described above.

This Addendum identifies the changes to previously identified project impacts, based on the revised project description. This Addendum, together with the Final Environmental Impact Report dated March 24, 2005 constitute adequate environmental documentation in compliance with CEQA for the proposed 2010 Revised Project.

Prepared by: Suzanne Riege, Assistant Planner

Reviewed by: Melissa Hetrick, Environmental Analyst

Date: 7/30/10

Date: 7/3/10