



THE CITY OF SAN DIEGO

ADDENDUM

Project No. 534380
Addendum to EIR No. 89-1222
SCH No. 91061052

SUBJECT: RV/MINI STORAGE: A request for an EASEMENT VACATION to vacate existing open space easement, and a PLANNED DEVELOPMENT PERMIT (PDP) for the construction of a recreational vehicle (RV) storage and mini-storage facility. The development would include 139,587 square feet of mini-storage within four buildings, and accommodate 69 RV parking spaces, 27 parking spaces (14 spaces for rental storage and 13 for office space), site access improvements, and other infrastructure improvements. The 10.02-acre project site is located at the terminus of Azuaga Street to the southwest of Interstate 15 (I-15) and State Route 56 (SR 56)/Ted Williams Parkway interchange and is designated Recreational Vehicle/Mini-Storage Facility and Zoned RS-1-13 within the Rancho Peñasquitos Community Plan. Additionally, the project site is within the Airport Land Use Compatibility Overlay Zone (Marine Corps Air Station [MCAS] Miramar), Airport Influence Area (Review Area 2), Very High Fire Severity Zone, and Transit Priority Area. (Legal Description: Lot 12 of Sun Ridge Vista Unit No. 1, Map No. 11924) Applicant: Pardee Homes

I. SUMMARY OF ORIGINAL PROJECT

The 1992 Rancho Peñasquitos Community Plan update anticipated this RV and mini-storage project and it was addressed in the Rancho Peñasquitos Community Plan Update Environmental Impact Report (EIR; No. 89-1222/SCH No. 91061052; City of San Diego 1992a), which is discussed further below. The Community Plan Update included a new Industrial Element that identified the project site as a location for a future RV storage/mini-warehouse lot. The site was identified as a 10.23-acre parcel and was noted to be "heavily disturbed due to previous use as a construction yard." The site access was identified to be through the adjacent multi-family development. The Community Plan included 10 recommendations for the future development. In summary, the RV storage was recommended to include approximately 200 spaces, and it was recommended that equivalent open space be provided to replace the open space easement to be vacated. Visual recommendations included heavy landscaping to provide visual buffers; outdoor lighting that minimizes visual impacts; compatible design, color, and materials relative to the adjacent residential; and low-scale signage. As the site zoning was not changed as a part of the Community Plan Update project, the project requires a PDP for implementation.

II. PROJECT DESCRIPTION

The project consists of a request for a PDP to construct an RV storage and mini-storage facility. The development would include 139,587 square feet of mini-storage and office space, 69 RV parking spaces, 27 parking spaces (14 spaces for rental storage and 13 for office space), site access improvements, and other infrastructure improvements. The site would be accessed from Azuaga Street via the Terra Vista development to the west. Construction is anticipated to begin in January 2020 and last for approximately one year. The project site plan is shown on Figure 1.

The mini-storage facility would consist of four buildings in the central area of the site, while the RV parking would be provided along the eastern portion of the site. The buildings would be three stories in height, and would range from 16,242 to 44,901 square feet (Table 1). Building height would not exceed the Zoning Code 35-foot height limit. Building colors would be neutral, such as grays, tans, and browns. In accordance with City Municipal Code Section 142.0740, the project would include exterior lighting that would be directed and shielded downward. Buildings would be screened from public roadway views by landscaping.

Table 1 Buildings		
Building	Square Footage	Building Height
A	44,910	3 Stories, 34'-4"
B	40,416	3 Stories, 34'-4"
C	16,242	3 Stories, 34'-4"
D	38,019	3 Stories, 34'-4"

Project access is from a single driveway at the eastern Azuaga Street terminus (cul-de-sac). The project would share a driveway with the existing built and occupied Terra Vista multi-family development. The project has an existing access easement with the Terra Vista multi-family development. On-site circulation consists of a loop road that would serve the mini-storage buildings and the RV parking areas. There are two gates regulating access to the site with on-site parking for potential clients prior to the gates.

The project would include 27 parking spaces based on the rental storage (mini-storage) area and office area. The rental storage requires 14 spaces and the office area requires a minimum of 13 spaces.

As indicated above, the project includes heavy landscaping along the perimeter to screen the development from adjacent roadways and the residential development. Landscaping totals 2 acres. Trees proposed include Torrey pines, California sycamore, coast live oak, and California black oak. Trees proposed within the San Diego Gas and Electric (SDG&E) easement area include African sumac, crape myrtle, and bronze loquat. Screen shrubs include spice bush, toyon, cape plumbago, lemonadeberry, and sugar bush. The project also includes a hydroseed mix of native, low fuel volume species for revegetation. Refer to the landscape plan for additional details. All landscape and irrigation would conform to the City of San Diego Landscape Regulations and City of San Diego Land Development Manual Landscape Standards.

Grading for the project would require a total of 25,700 cubic yards (cy) of cut, and 25,700 cy of fill, resulting in no net import or export of soil. The maximum depth of fill would be 11 feet while the maximum depth of cut would be 13 feet. The maximum height of cut slopes would be 10 feet, while the maximum height of fill slope would be 12 feet. The project would construct two retaining walls in order to accommodate site development and reduce grading. Retaining Wall A would be 231 linear feet in length, ranging from 1 to 12 feet in height, located along the northern boundary of the site. Retaining Wall B would be 37 linear feet in length, ranging from 1 to 10 feet in height, located along the western boundary of the site. The project would install a 9-foot-wide-by-5-foot-high sign located at the entrance to the project site along Azuaga Street.

There is an existing off-site drainage that collects runoff from State Route 56 (SR-56)/Ted Williams Parkway, discharges on-site via a storm drain pipe, flows through an on-site concrete drainage channel, and discharges in the southern area of the project site. The project would replace the concrete-lined channel with an underground storm drain pipe, provide a biofiltration basin, and construct an energy dissipater at outfalls near an existing wetland. In addition, an earthen channel would be provided along the southeastern edge of the development.

The project would install an 8-inch sewer pipeline that would connect to existing facilities associated with the adjacent Terra Vista Development. In addition, the project would install a 24-inch water pipe along the northern and eastern boundary of the project site, to which an internal network of 8-inch water main pipeline would connect.

Consistent with the Rancho Peñasquitos Community Plan recommendation, the open space easement that covers the site would be vacated as a part of the project.

III. ENVIRONMENTAL SETTING

The RV/Mini Storage Project (project) is located in the Rancho Peñasquitos community planning area (CPA) of the city of San Diego, on Assessor's Parcel Number 315-570-0700 (Figures 2 and 3). The 10.02-acre project site is located at the terminus of Azuaga Street in the southwest corner of the intersection of I-15 and SR-56/Ted Williams Parkway, with SR-56 serving as the northern boundary of the site and I-15 serving as the southeastern boundary. A large multi-family residential development is located along the western boundary of the site, and an undeveloped area is to the south.

The project is located on the west side of the Chicarita Creek drainage, on the slopes of a west-to-east trending ridgeline. Elevations on-site range from 525 feet to 575 feet above mean sea level. The site is disturbed from previous use as a construction staging area, as well as grading associated with the freeway and adjacent residential construction. The western end of the site consists of a moderately steep slope, made steeper by fill from the development of the multi-family development immediately west of the site. A ramp has been built in the northwest corner of the site to allow vehicle access from the development to the west. This ramp grades into a low ridge running close to the northern boundary of the property. The majority of the site slopes gently to the southeast. There is a concrete-lined drainage ditch running north to south through the approximate center of the site and a second, much smaller, concrete drain in the southwest edge of the site. Chicarita Creek is approximately 1,150 meters to the southeast of the site and Peñasquitos Creek is approximately 2,000 meters to the south.

The vegetation on-site is comprised primarily of non-native grassland and ornamental landscaping, with wetland habitat existing in the southern area of the site. A manufactured slope along the southern and eastern sides of the site is landscaped with ornamental plant species as part of the existing residential development. Two small areas associated with a concrete drainage that traverses the site supports plant species associated with wetlands (e.g., freshwater marsh, willow scrub, and mule fat scrub). The non-native grassland (MSCP Tier III-B), freshwater marsh (wetland habitat), willow scrub (wetland habitat), and mule fat scrub (wetland habitat) qualify as Environmentally Sensitive Lands (ESL).

Additionally, the project site is within the Airport Land Use Compatibility Overlay Zone (Marine Corps Air Station (MCAS) Miramar), Airport Influence Area (Review Area 2), Very High Fire Severity Zone, and Transit Priority Area. The project is situated in an area currently served by existing public facilities.

IV. ENVIRONMENTAL DETERMINATION

The City previously prepared and certified the Rancho Peñasquitos Community Plan Update EIR No. 89-1222/SCH No. 91061052. Based on all available information in light of the entire record, the analysis in this Addendum, and pursuant to Sections 15162 and 15164 of the State 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 document 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 that 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. The Rancho Peñasquitos Community Plan Update Environmental Impact Report is incorporated by reference pursuant to CEQA Guidelines Section 15150. Public review of this Addendum is not required per CEQA.

V. IMPACT ANALYSIS

This Addendum includes the following subsequent impact analysis to demonstrate that environmental impacts associated with the project are consistent with the previously certified EIR. The following includes the environmental issues analyzed in detail in the EIR as well as the project-specific analysis pursuant to CEQA. The analysis in this document evaluates the adequacy of the EIR relative to the project. The following analysis documents that the proposed modifications and/or refinements would not cause new or more severe significant impacts than those identified in the 1992 EIR.

The following includes the project-specific environmental review pursuant to the CEQA. The analysis in this document evaluates the adequacy of the 1992 EIR relative to the project.

Impact Analysis Summary

The 1992 EIR identified significant unmitigated impacts to landform alteration/visual quality, traffic, air quality, land use, and growth inducement. The EIR identified significant and mitigated impacts to biological resources, hydrology/water quality, and cultural resources. Noise was also evaluated, but determined to be less than significant. A summary of project impacts in relation to the 1992 FEIR is provided in Table 2.

Table 2 Impact Assessment Summary				
Environmental Issues	1992 FEIR Finding	Project	Project Mitigation?	Project Resultant Impact
Transportation/ Circulation and Parking	Significant, Unmitigated	No new impacts	No	Less than Significant
Air Quality	Significant, Unmitigated	No new impacts	No	Less than Significant
Land Use	Significant, Unmitigated	No new impacts	No	Less than Significant
Biological Resources	Less than Significant with Mitigation	No new impacts	Yes	Less than Significant with Mitigation
Landform Alteration/ Visual Quality	Significant, Unmitigated	No new impacts	No	Less than Significant
Hydrology/Water Quality	Less than Significant with Mitigation	No new impacts	No	Less than Significant
Noise	Less than Significant	No new impacts	No	Less than significant
Cultural Resources	Less than Significant with Mitigation	No new impacts	No	Less than Significant

Land Use

1992 EIR

The 1992 EIR determined that the project would result in the loss of open space associated with the conversion of open space land to industrial uses, which would have a significant secondary impact on visual quality. The 1992 EIR identified this could be mitigated by either a sensitively designed project that is well screened or by locating the RV parking/storage facility in the Sabre Springs industrial area. The analysis identifies that the proposed open space conversion to industrial uses would impact wildlife due to a loss of habitat, but impacts would be less than significant due to the low quality of existing habitats and disturbed conditions.

In addition, the 1992 EIR determined that there would be a potentially significant impact on land use if future development proposals that are consistent with the community plan, but are not consistent with adopted resource protection regulations, are proposed, since an analysis for development suitability and consistency with the Resource Protection Ordinance (RPO) was not conducted for the Community Plan Update.

Project

A land use conformance analysis with the Peñasquitos Community Plan, including the 10 Industrial Element recommendations, was completed. As detailed in Table 3, the project would be consistent with the Industrial land use designation as currently adopted in the Peñasquitos Community Plan. Thus, the project would not conflict with this adopted land use plan.

Table 3
Land Use Conformance Analysis

Recommendations	Conformance Analysis
Permit development of an RV storage and mini-warehouse facility on an approximately 10-acre open space easement southwest of the I-15 and SR-56 interchange.	The project would construct an RV storage and mini-storage facility on the approximately 10.02-acre lot, located southwest of the I-15 and SR-56 interchange. The project would conform to this recommendation.
Vacate the existing open space easement (Lot 12) that was established when the Sun Ridge Vista development was approved and provide equivalent open space at another location acceptable to the Park and Recreation department.	The project would require the vacating of the existing open space easement in order to construct the RV storage and mini-storage facility. The project would provide equivalent open space in the East Elliott area adjacent to the existing Mission Trails Regional Park. See Open Space Equivalency Analysis (Leppert Engineering 2018). The analysis of the project's value as open space was assessed based on the purpose for the designation of open space zones as described in the City's Zoning Ordinance and General Plan. The analysis concludes that the open space values currently provided by the site consist of marginal visual buffers and environmentally sensitive lands over a portion of the site. The project's proposed design would improve the visual buffer values of the site and replace the ESL values via habitat mitigation in accordance with the Biology Guidelines. The project would conform to this recommendation.
Development of this site should be restricted to RV storage and mini-storage warehouse uses and associated uses. Other uses should not be permitted.	The project would construct 139,587 square feet of mini-storage and office space and 69 RV parking spaces. In addition, the project would construct associated uses, including 27 parking spaces, , site access improvements, and other infrastructure improvements (Leppert Engineering 2018). No other uses would be permitted. The project would conform to this recommendation.
If development of an RV storage and mini-warehouse facility is determined to be infeasible at this location, the land use designation for the site should be open space and the open space easement should remain on the property.	The project has been designed to allow for the construction of an RV storage and mini-storage facility. As such, it has been determined that the construction of such a facility is feasible. Should this land use become infeasible in the future, the project site would be converted back to open space. The project would conform to this recommendation via permit conditions.

Table 3 Land Use Conformance Analysis	
Recommendations	Conformance Analysis
The open space easement should remain on this site until such a time as an RV/mini-storage project is approved by the City. If RV/mini-storage use is discontinued, the open space easement should be re-established.	The project site is currently within an open space easement. The project would require the vacating of this easement, which would occur upon approval of the project by the City. The project would conform to this recommendation.
The RV storage portion of the site should contain approximately 200 spaces.	The project has been designed to incorporate 69 RV parking spaces, which is less than the recommended number due to the need to avoid wetland areas. RV parking spaces have been maximized to the extent feasible and the project is considered consistent.
The site should be heavily landscaped to provide an effective visual buffer from the adjacent residential development and freeways.	The project proposes a landscaping plan (Project Design Consultants 2018) with substantial landscaping (2 acres) with trees to provide adequate screening. The project would conform to this recommendation.
Outdoor lighting should be permitted only on the RV storage facility and should be designed to minimize potential visual impacts.	Exterior lighting would be required to comply with City Code, including shielding to reduce light spillage. The project would conform to this recommendation.
The design, color, and materials of mini-storage structures should be compatible with the adjacent residential neighborhood and natural areas. Mini-storage buildings and paved areas should be designed and sited so as to be as unobtrusive as possible.	The project proposes the use of neutral colors, such as tans, browns, and grays (Sillman Wright Architects 2018). The structures would be consistent with the residential zoning code height limit of 35 feet, and would be at a lower elevation than the adjacent residences so to not appear obtrusive. The project would conform to this recommendation.
Only low-scale monument type designs should be permitted.	The project would install a 9-foot-wide-by-5-foot-high sign located at the entrance to the project site along Azuaga Street. The project would conform to this recommendation.

The project would include visual screening in the form of landscaping, which would reduce its visibility from the freeway and adjacent residences (Leppert Engineering 2018).

The City RPO has been replaced by updated biological regulations, including the Land Development Code Biological Guidelines and the City's Multiple Species Conservation Plan (MSCP). The project is within the City's MSCP area but is not within or adjacent to any preserve areas. The site does contain sensitive habitats and would avoid or mitigate for impacts in accordance with the Biological Guidelines. Refer to the Biological Resources section below for additional details. Compliance with the regulatory mechanisms in place would ensure the project does not conflict with adopted environmental plans.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIR occur.

Transportation/Circulation and Parking

1992 EIR

The 1992 EIR analyzed traffic impacts that could occur as a result of the 1992 updates to the Community Plan including the recommendation for an RV storage facility to be constructed on the project site accommodating 200 RV storage spaces. The 1992 EIR completed a street system capacity analysis utilizing traffic models. The transportation analysis identified recommended roadway classification changes based on the addition of Community Plan Update land use traffic to the build-out roadway conditions. These recommendations included the following:

1. SR-56 improved to a six-lane freeway from I-15 to the western community plan boundary
2. Black Mountain Road improved to a six-lane primary arterial between Twin Trails Drive and the southern community boundary
3. Rancho Peñasquitos Boulevard to a five-lane Major between Carmel Mountain Road and Azuaga Street
4. Salmon River Road downgraded to a two-lane collector
5. Peñasquitos Drive downgraded to a local street from Paseo Valdear to the northern community boundary
6. Carmel Mountain Road downgraded to a five-lane Major between Paseo Montalban and Rancho Peñasquitos Boulevard

The 1992 EIR concluded direct traffic impacts would be less than significant with the proposed reclassifications.

In regards to the proposed Camino Ruiz extension, the EIR determined that the extension of Camino Ruiz across Los Peñasquitos Canyon would not have a significant direct impact on traffic circulation in Rancho Peñasquitos. However, the EIR stated that there would be a significant cumulative impact on traffic circulation in Mira Mesa due to increased volumes on the already overloaded Black Mountain Road, Mira Mesa Boulevard, and Mercy Road. In addition, there would be a significant impact on the regional circulation system due to the elimination of an additional arterial parallel to I-15 and I-5. These impacts would be significant and unmitigated.

Project

Operational Traffic Impacts

The project would generate traffic as a result of the proposed 69 RV parking spaces and mini-storage uses; however, traffic generation would be less than what would be generated by a facility with 200 RV spaces as was recommended in the 1992 Community Plan. As detailed in the Transportation Access Analysis (LOS Engineering 2019), the total project trip generation is calculated at 281 average daily traffic (ADT) with 16 AM peak hour trips (8 inbound and 8 outbound) and 26 PM peak hour trips (13 inbound and 13 outbound). Under both Existing plus Project and Near Term

Cumulative conditions, the study area intersections and segments were calculated to operate at LOS D or better except for the intersection of Rancho Peñasquitos Boulevard/SR-56 EB Ramp/Azuaga Street (LOS E PM) and the segment of Rancho Peñasquitos Boulevard from Azuaga Street to Calle de las Rosas (LOS E daily). However, because the increase in delay as a result of the project is below the City's significance thresholds, direct impacts at these locations would be less than significant (see LOS Engineering 2018, Tables 10 and 11 and Tables 17 and 18).

Construction Traffic Impacts

The project Access Analysis evaluated whether impacts would result from traffic generated during project construction. Project construction traffic was based on client-provided data from a contractor building a similar self-storage project in Rancho San Diego. Project construction is scheduled to require about 11 months plus up to 1 month for weather delays (see LOS Engineering 2019, Appendix H). The temporary construction trip generation by phase of construction and maximum number of trips are calculated at 100 ADT with 32 AM peak hour trips (32 inbound and 0 outbound), and 32 PM peak hour trips (0 inbound and 32 outbound). Under Near Term with Construction Traffic conditions, the study area intersections and segments were calculated to operate at LOS D or better except for the intersection of Rancho Peñasquitos Boulevard/SR-56 EB Ramp/Azuaga Street (LOS E PM) and the segment of Rancho Peñasquitos Boulevard from Azuaga Street to Calle de las Rosas (LOS E daily). As detailed in LOS Engineering 2019, Tables 20-22, there are no significant direct impacts because the addition of construction traffic does not exceed the significance thresholds.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIR occur.

Air Quality

1992 EIR

The 1992 EIR determined that the project would result in significant project-specific and incremental impacts on air quality in the San Diego Air Basin (SDAB). Both direct and incremental impacts were associated with congestion that would occur on Mira Mesa roadways due to the Camino Ruiz extension not being constructed. The 1992 EIR determined that implementation of the land use plan as set forth in the Rancho Peñasquitos Community Plan Update would not directly impact the ability of the region to attain federal air quality standards, because the Community Plan Update proposed reducing the allowable development from the previously adopted plan.

In regards to cumulative air quality impacts, the 1992 EIR determined that incremental impacts on air quality would occur in the SDAB as a result of the increased emissions due to backups at three intersections in Mira Mesa, if Camino Ruiz was not constructed as a through-arterial. In addition, the increase in emissions due to development of currently undeveloped land in Rancho Peñasquitos would have a significant cumulative impact on air quality in the region.

The 1992 EIR identified mitigation, stating that implementation of the of transportation tactics outlined in the 1991 Regional Air Quality Strategy (RAQS) would help to implement the RAQS, but

would not reduce the direct or cumulative impact to a below a level of significance. These measures were identified in the Mira Mesa Community Plan goals, proposals, and implementation measures. Such measures included a goal to provide transportation systems that maximize the opportunities for transit use; a goal to provide a system of bikeways and pedestrian facilities to encourage walking and biking; policies for new development that require accommodations for transit use; policies to provide bicycle parking and storage at all commercial sites; recommendations for specific traffic improvements; and a requirement to design the future Carroll Canyon development area in a manner that would support mass transit.

In addition, the Rancho Peñasquitos Community Plan Update resulted in a density reduction as compared to the land use plan that was utilized to produce the San Diego Association of Governments (SANDAG) Series VII growth forecast and in development of the 1991 RAQS. As such, the updated community plan was determined to result in a reduction of emissions projected by the Series VII forecast. Therefore, the 1992 EIR determined that implementation of the community plan would mitigate the impact on regional air quality compared to implementation of the previously adopted plan, but not to below a level of significance. Impacts would remain significant and unmitigable.

Project

Consistency with Air Quality Standards

The project was evaluated against the growth projections used by the San Diego Air Pollution Control District to determine whether it would be consistent with the RAQS. Generally, projects that propose development consistent with the growth anticipated by SANDAG's growth projections and/or the General Plan would not conflict with the RAQS. The project would be consistent with the Community Plan land use designation for an RV and mini-storage facility, and would, therefore, not conflict with the growth projects and assumptions used in the RAQS.

Project Emission Impacts

Emissions due to construction and operation of the project were calculated using California Emissions Estimator Model (CalEEMod) 2016.3 and compared to the current City of San Diego Significance Determination Thresholds (City of San Diego 2016) to determine whether the project would result in impacts to air quality.

Construction emissions were calculated assuming construction activities occur in the year 2020. Construction emissions are summarized in Table 4. CalEEMod output files are contained in RECON Environmental, Inc. (RECON) 2018a.

Table 4 Summary of Worst-case Construction Emissions (pounds per day)						
Construction	Emissions					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Site Preparation/Grading	5	56	33	0	9	6
Foundations	3	24	18	0	2	1
Vertical Construction	3	24	20	0	2	1
Paving & Finish Site	2	17	16	0	1	1
Maximum Daily Emissions	5	56	33	0	9	6
<i>Significance Threshold</i>	<i>137</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>67</i>

As shown in Table 4, construction-related emissions would be below the significance thresholds. Impacts would be less than significant.

The primary emissions from the operation of the project would be vehicle emissions. For operational emissions, it was assumed that the project would generate a total of 281 trips per day, based City of San Diego Trip Generation Manual, May 2003 and RV use data (see LOS Engineering 2018). Operational emissions are summarized in Table 5.

Table 5 Summary of Project Operational Emissions (pounds per day)						
Source	Emissions					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Sources	3	0	0	0	0	0
Energy Sources	0	0	0	0	0	0
Mobile Sources	1	2	6	0	2	0
Total	4	2	6	0	2	0
<i>Significance Threshold</i>	<i>137</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>67</i>

As shown in Table 5, emissions would be less than the City's current significance thresholds. In addition, the project would not generate more traffic than what was analyzed in the 1992 EIR and, therefore, would not worsen impacts identified at three intersections in Mira Mesa, if Camino Ruiz was not constructed as a through arterial.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIR occur. The EIR air quality mitigation does not apply to the proposed project, as it was related to roadway improvements.

Biological Resources

1992 EIR

The 1992 EIR determined that implementation of the community plan would have significant direct and incremental impacts on biological resources. The 1992 EIR determined that the loss of sensitive

biological resources due to development of currently undeveloped residential and commercially-designated sites would contribute incrementally to regional losses of these resources, resulting in a significant cumulative impact. The EIR identifies that subsequent discretionary projects would provide project-specific analysis and implement the RPO to reduce impacts to below a level of significance.

Project

In accordance with the 1992 EIR, a site-specific biological technical report was prepared for the project by RECON (2019a) detailing the biological conditions that exist on-site. According to the technical report, and shown in Figure 4, the site consists of 6.55 acres of non-native grassland, 0.04 acre of freshwater marsh, 0.01 acre of willow scrub, 0.02 acre of mule fat scrub, and 3.40 acres of ornamental plantings (Table 6). The wetland habitats on-site are considered City wetlands, as well as U.S. Army Corps of Engineer (USACE), California Department of Fish and Wildlife (CDFW), and Regional Water Quality Control Board (RWQCB) jurisdictional. The concrete-lined drainage located in the central area of the site is a non-wetland waters/streambed only under the jurisdiction of the RWQCB. No sensitive species were observed or expected to occur due to the disturbed and isolated site conditions. The site is not located adjacent or within the City's Multi-habitat Planning Area (MHPA).

Table 6			
Proposed Impacts to Vegetation Communities and Land Cover Types			
Vegetation Communities/Land Cover Types	Existing Acres	MSCP Tier	Impact
Uplands			
Non-native Grassland	6.55	III-B	5.55
Ornamental Plantings	3.40	IV	0.44
Subtotal	9.95	-	5.99
Wetlands			
Freshwater Marsh	0.04	Wetland	0.00
Willow Scrub	0.01	Wetland	0.00
Mule Fat Scrub	0.02	Wetland	0.00
Subtotal	0.07	-	0.00
TOTAL	10.02		5.99

As detailed in the biological technical report, the project would impact 5.55 acres of sensitive non-native grassland habitat. No federal, state, or City of San Diego wetland area would be impacted by the project. The project would maintain a minimum 50-foot setback from the freshwater marsh wetland nearest the proposed development on the site to avoid any indirect impacts. This buffer distance is adequate given the relatively small area of wetland habitat and low functions and values of the wetlands.

While it is not a resource regulated by the City, it is noted the project would also impact the concrete-lined drainage that is considered a non-wetland waters/streamed and permits from the resource agencies would be required.

To mitigate for biological impacts, a Mitigation Monitoring Reporting Program (MMRP), as detailed in Section VI of the Addendum to an Environmental Impact Report would be implemented. With implementation of the MMRP, potential biological resources impacts would be reduced to below a level of significance.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIR occur.

Landform Alteration/Visual Quality

1992 EIR

The 1992 EIR determined that the conversion of native landforms and vegetation to manufactured urban forms would have a significant adverse impact on the visual nature of the community.

The 1992 EIR identified that the Industrial Element of the Rancho Peñasquitos Community Plan designated approximately 10 acres of land for use as an RV storage facility, located at the southwest corner of the intersection of I-15 and SR-56. The 1992 EIR found that a parking/storage facility at this location could have a significant impact on the visual quality of the area if not sensitively designed and screened. The 1992 EIR stated that visual impacts associated with the conversion of open space to industrial uses could be mitigated by requiring a sensitive design with adequate screening.

Project

Consistent with the mitigation proposed in the 1992 EIR, the project includes a Landscape Plan (see Figures 5a and 5b), which proposes the planting of trees and shrubs intended to screen the project from adjacent roadways and development. The existing trees combined with the proposed trees along the slope between the Terra Vista development would screen views of the proposed approximately 35-foot-tall buildings. The Landscape Plan blends and complements the existing native planting in the area, utilizing native low fuel volume species to re-vegetate the graded slopes. The palette of landscape plant material would provide variations of foliage, bark, and flower form, texture, and color. These variations would be used to blend in with existing surrounding landscape treatments, especially at perimeter slopes. Landscaped areas would total 2 acres.

To mitigate for visual impacts, a MMRP, as detailed in Section VI of the Addendum to an Environmental Impact Report would be implemented. With implementation of the MMRP, potential impacts to visual quality would be reduced to below a level of significance. To further illustrate the project's sensitive design and adequate screening, refer to Leppert Engineering 2018, which provides visual simulations of the project site.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIR occur.

Hydrology and Water Quality

1992 EIR

The 1992 EIR determined that development of undeveloped parcels within the Community Plan area would result in incremental impacts to downstream water quality due to increased siltation in the Los Peñasquitos Lagoon, resulting in a significant impact to surface water quality from storm and drainage runoff. However, the 1992 EIR stated that adherence to the Best Management Practices (BMPs) Program, which would detail water quality control measures that would be required to be implemented on a citywide basis, would mitigate the potential developments contribution to individual and cumulative water quality and hydrology impacts.

Project

Hydrology

A Drainage Report and a Stormwater Quality Management Plan were prepared for the project (Leppert Engineering 2019a and 2019b). In the existing condition, the project site consists of three drainage basins. Drainage from these three basins, as well as an additional offsite flow from SR-56 to the north of the project site, drains in a southeasterly direction within a plain cement concrete (PCC) lined channel that crosses the site in a north-south direction, and discharges into an existing wetland located on-site. The wetland discharges to Los Peñasquitos Creek, to the Peñasquitos Lagoon, and ultimately to the Pacific Ocean. Currently, downstream waters are listed as 404(d) impaired for enterococcus, fecal coliform, selenium, total dissolved solids, nitrogen, toxicity, and sedimentation/siltation.

In the proposed condition, the existing drainage basins would remain the same; however, the PCC channel would be removed and replaced with a storm drain pipe that would be extended to the southerly property line where it would discharge via an energy dissipater into a remaining section of existing concrete drainage channel, which would discharge into a biofiltration basin and then into the existing wetland. In addition, the project would provide an earthen replacement channel to the southwest of the development on-site.

Water Quality

Implementation of BMPs would ensure impacts to downstream water quality would be less than significant. As required, the project would control runoff rates to existing levels and maintain drainage patterns. The project would comply with the City's storm water requirements, as indicated in the 1992 EIR analysis.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIR occur.

Noise

1992 EIR

The 1992 EIR determined that implementation of the land use plan would not have a significant impact on the acoustical environment in the community. All of the roadway segments within the planning area that were expected to produce noise levels in excess of 60 A-weighted decibels [dB(A)] would be at least four-lane major roads, and no homes would front directly along these roadways. In addition, the 1992 EIR stated that where the major roads were adjacent to single-family residential neighborhoods, large building setbacks or barriers such as berms and walls would be constructed to reduce exterior noise levels. The 1992 EIR determined that all street segments within the plan area that may produce exterior noise levels in excess of 65 dB(A) would be greater than 50 feet away from any exterior living area; as such, no significant impact associated with traffic noise was anticipated.

In regards to noise generated by aircraft operations at MCAS Miramar, the 1992 EIR stated that the entire community plan area is outside of the 65 dB(A) noise contour for the air field. Thus, noise impacts associated with aircraft was determined to be less than significant.

Project

A Noise Impact Memorandum (Noise Memo) was prepared for the project by RECON (2019b). As discussed in this Noise Memo, the project would generate noise from construction activities, from operational activities including heating, ventilation, and air conditioning (HVAC) equipment, and from traffic generation associated with the access road to the project site that would be a shared access with the Terra Vista multi-family development at the end of Azuaga Street.

The project would not generate traffic beyond what was analyzed in the 1992 EIR and, therefore, an increase in ambient noise levels in the Community Plan area would not result. To determine noise impacts associated with construction, HVAC equipment, and vehicle access, property line noise levels generated by the project were assessed, the results of which are discussed below.

Construction

Project construction noise would be generated by diesel engine-driven construction equipment used for site preparation and grading, building construction, loading, unloading, and placing materials and paving. Per City of San Diego regulations, construction would be restricted to between the hours of 7:00 a.m. and 7:00 p.m. and construction noise levels may not exceed a 12-hour equivalent noise level [dB(A) $L_{eq(12)}$] of 75 dB(A) $L_{eq(12)}$ as assessed at or beyond the property line of a property zoned as residential. There are residential uses located west of the project site. As discussed in the Noise Memo, construction noise levels were modeled, and it was determined that construction noise levels would not exceed 75 dB(A) L_{eq} at the adjacent residential uses. Therefore, impacts were determined to be less than significant.

HVAC Equipment

The project would include roof-mounted HVAC units above the office portion of the Building A. All other storage space would not include heating or air conditioning. As discussed in the Noise Memo, property line noise levels due to HVAC equipment were calculated, and it was determined that HVAC noise levels would not exceed the City's Noise Abatement and Control Ordinance noise level limit of 45 dB(A) L_{eq} at the property line. Therefore, impacts due to on-site generated noise were determined to be less than significant.

Site Access

As discussed, site access would be through the adjacent Terra Vista multi-family complex, which would result in additional vehicles using the northern driveway/parking access road at the end of Azuaga Street. As modeled in the Noise Memo, the peak hour noise level at the multi-family building located closest to the access road (50 feet) would be 44 dB(A) L_{eq} . The measured ambient noise level in the vicinity is 67.6 dB(A) L_{eq} . As such, noise generated by vehicles accessing the project site would not result in a measurable increase in existing ambient noise levels, and would not generate noise that exceeds the City's compatibility standards. Thus, impacts were determined to 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 EIR. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIR occur.

Cultural Resources

1992 EIR

The 1992 EIR determined that there was a potential for impacts to cultural resources during development of remaining undeveloped parcels within the Rancho Peñasquitos Community Plan area; however, preservation of resource or mitigation of such impacts would be addressed at the project level.

Project

In accordance with the 1992 EIR, a historical resources survey for the project was completed by RECON. As discussed in the Historical Resources Survey Report (RECON 2019c), no significant prehistoric or historic cultural resources have been previously recorded within or immediately adjacent to the project area, and no new historic or prehistoric cultural resources were found during the survey of the project area. Based on record search and field survey results, implementation of the project would result in no impacts to known significant historical resources as defined by the City of San Diego. Subsequent to the cultural resources survey, a geologic testing program was conducted by GEOCON Inc. for the project. Archaeological monitoring associated with the geologic testing was completed on September 4 and 18, 2018. Geologic test trenching showed there is substantial subsurface disturbance from undocumented fill being dumped on the property in the past and the original ground surface and the A horizon soils are absent or heavily disturbed. A letter was prepared detailing the results of the monitoring and concluded cultural resources monitoring would no longer be warranted (RECON 2018b). Furthermore, no significant prehistoric or historic

cultural resources have been previously recorded within or immediately adjacent to the project area; no new historic or prehistoric cultural resources were found during the RECON 2017 survey of the project area; and no cultural resources were observed during the monitoring of the GEOCON geologic testing in September 2018. These reasons support the conclusion that the lack of potential for subsurface cultural resources to be present on the project site and no additional cultural resources work would be required for the project.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIR occur.

VI. ISSUES NOT ANALYZED IN THE PREVIOUS EIR

California Environmental Quality Act (CEQA) Guidelines, Section 15128, allows environmental issues for which there is no likelihood of a significant impact to not be discussed in detail or analyzed further in the EIR. The certified Environmental Impact Report (EIR) provided a similar level of analysis, even for those issue areas considered to result in impacts found not to be significant.

Revisions to the project components evaluated under the EIR are proposed with the current project. Through the environmental analysis conducted, the City has determined that the current project, subject of and evaluated under this Addendum would not have the potential to cause significant impacts to those issue areas beyond those analyzed. While these issues were not analyzed in detail, as outlined in CEQA Section 15128, there is no new information available that would indicate that these issues would result in new significant impacts.

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

The project shall be required to comply with applicable mitigation measures outlined within the Mitigation Monitoring Reporting Program of the previously certified EIR (No. 89-1222/ SCH No. 91061052) and the project-specific biological technical studies. The following MMRP identifies measures that specifically apply to this project.

A. GENERAL REQUIREMENTS – PART I Plan Check Phase (prior to permit issuance)

1. Prior to the issuance of any construction permits, such as Demolition, Grading or Building, or beginning any construction-related activity on-site, the Development Services Department (DSD) Director's Environmental Designee (ED) shall review and approve all Construction Documents (CD), (plans, specification, details, etc.) to ensure the MMRP requirements are incorporated into the design.
2. In addition, the ED shall verify that the MMRP Conditions/Notes that apply ONLY to the construction phases of this project are included VERBATIM, under the heading, **"ENVIRONMENTAL/MITIGATION REQUIREMENTS."**
3. These notes must be shown within the first three (3) sheets of the construction documents in the format specified for engineering construction document templates

as shown on the City website: <http://www.sandiego.gov/development-services/industry/information/standtemp>.

4. The **TITLE INDEX SHEET** must also show on which pages the "Environmental/Mitigation Requirements" notes are provided.
5. **SURETY AND COST RECOVERY** – The Development Services Director or City Manager may require appropriate surety instruments or bonds from private Permit Holders to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

B. GENERAL REQUIREMENTS – PART II Post Plan Check (After permit issuance/Prior to start of construction)

1. **PRE CONSTRUCTION MEETING IS REQUIRED TEN (10) WORKING DAYS PRIOR TO BEGINNING ANY WORK ON THIS PROJECT.** The PERMIT HOLDER/OWNER is responsible to arrange and perform this meeting by contacting the CITY RESIDENT ENGINEER (RE) of the Field Engineering Division and City staff from MITIGATION MONITORING COORDINATION (MMC). Attendees must also include the Permit holder's Representative(s), Job Site Superintendent, and the following consultant: **Qualified Archaeological Monitor, Native American Monitor, Qualified Biologist**

NOTE: Failure of all responsible Permit Holder's representatives and consultants to attend shall require an additional meeting with all parties present.

CONTACT INFORMATION:

- a) The PRIMARY POINT OF CONTACT is the **RE** at the **Field Engineering Division – 858-627-3200**
 - b) For Clarification of ENVIRONMENTAL REQUIREMENTS, applicant is also required to call **RE and MMC at 858-627-3360**
2. **MMRP COMPLIANCE:** This Project, Project Tracking System (PTS) Number 534380 and or Environmental Document # 534380, shall conform to the mitigation requirements contained in the associated Environmental Document and implemented to the satisfaction of the DSD's Environmental Designee (MMC) and the City Engineer (RE). The requirements may not be reduced or changed but may be annotated (i.e., to explain when and how compliance is being met and location of verifying proof, etc.). Additional clarifying information may also be added to other relevant plan sheets and/or specifications as appropriate (i.e., specific locations, times of monitoring, methodology, etc.

NOTE: Permit Holder's Representatives must alert RE and MMC if there are any discrepancies in the plans or notes, or any changes due to field conditions. All conflicts must be approved by RE and MMC BEFORE the work is performed.

3. **OTHER AGENCY REQUIREMENTS:** Evidence of compliance with all other agency requirements or permits shall be submitted to the RE and MMC for review and acceptance prior to the beginning of work or within one week of the Permit Holder obtaining documentation of those permits or requirements. Evidence shall include copies of permits, letters of resolution, or other documentation issued by the responsible agency: **Army Corps of Engineers, California Department of Fish and Wildlife, Regional Water Quality Control Board, San Diego Gas & Electric**

4. **MONITORING EXHIBITS:** All consultants are required to submit, to RE and MMC, a monitoring exhibit on a 11x17 reduction of the appropriate construction plan, such as site plan, grading, landscape, etc., marked to clearly show the specific areas including the **LIMIT OF WORK**, scope of that discipline's work, and notes indicating when in the construction schedule that work would be performed. When necessary for clarification, a detailed methodology of how the work would be performed shall be included.

NOTE: Surety and Cost Recovery – When deemed necessary by the Development Services Director or City Manager, additional surety instruments or bonds from the private Permit Holder may be required to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

5. **OTHER SUBMITTALS AND INSPECTIONS:** The Permit Holder/Owner's representative shall submit all required documentation, verification letters, and requests for all associated inspections to the RE and MMC for approval per the following schedule:

DOCUMENT SUBMITTAL/INSPECTION CHECKLIST		
Issue Area	Document Submittal	Associated Inspection/Approvals/Notes
General	Consultant Qualification Letters	Prior to Preconstruction Meeting
General	Consultant Construction Monitoring Exhibits	Prior to or at Preconstruction Meeting
Biology/Land Use	Biology Reports	Biology Site Observation and Preconstruction Reports
Bond Release	Request Letter for Bond Release	Final MMRP Inspections Prior to Bond Release

C. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

BIOLOGICAL RESOURCES (Impacts to Non-Native Grassland)

Prior to the issuance of a Notice to Proceed or any permits, including but not limited to, the first Grading Permit, Demolition/Development Plans/Permits, and Building Plans/Permits, whichever is applicable, the Owner/Permittee shall mitigate the project's sensitive upland impacts in accordance with the City's Biology Guidelines (2012). Accordingly, the Owner/Permittee shall mitigate for project impacts to 5.55 acres of Tier IIIb habitat (non-

native grassland) outside the MHPA at a 0.5:1 mitigation ratio with 2.78 acres of Tier IIIb inside the MHPA or at a 1:1 mitigation ratio with 5.55 acres of Tier IIIb if mitigation is located outside the MHPA.

VISUAL QUALITY

Prior to issuance of a Notice to Proceed or any permits, including but not limited to, the first Grading Permit, Demolition/Development Plans/Permits, and Building Plans/Permits, whichever is applicable, the Owner/Permittee shall show proof of sensitive design with adequate screening consistent with the Landscape Plans and visual simulations included herein.

VIII. SIGNIFICANT UNMITIGATED IMPACTS

The Rancho Peñasquitos Community Plan Update EIR (EIR No. 89-1222; SCH No. 91061052) identified significant unmitigated impacts to landform alteration/visual quality, traffic, air quality, land use, and growth inducement. The EIR identified significant and mitigated impacts to biological resources, hydrology/water quality, and cultural resources. Noise was also evaluated, but determined to be less than significant. Because there were significant unmitigated impacts associated with the original project approval, the decision maker was required to make specific and substantiated "CEQA Findings" which stated: (a) specific economic, social, or other considerations which make infeasible the mitigation measures or project alternatives identified in the FEIR, and (b) the impacts have been found acceptable because of specific overriding considerations. Given that there are no new or more severe significant impacts that were not already addressed in the previous certified EIR, new CEQA Findings and or Statement of Overriding Considerations are not required.

The proposed project would not result in any additional significant impacts nor would it result in an increase in the severity of impacts from that described in the previously certified EIR.

IX. CERTIFICATION

Copies of the Addendum, the EIR, the MMRP, and associated project-specific technical appendices, if any, may be reviewed by appointment in the office of the Development Services Department, or purchased for the cost of reproduction.



E. Shearer-Nguyen, Senior Planner
Development Services Department

March 15, 2019

Date of Final Report

Analyst: M. Dresser

Figures

- Figure 1: Project Site Plan
- Figure 2: Regional Location
- Figure 3: Project Location on Aerial Photograph
- Figure 4: Biological Resources
- Figures 5a and 5b: Landscape Plans

References

Leppert Engineering

- 2018 Open Space Equivalency Analysis - Rancho Peñasquitos Recreational Vehicle (RV) Storage/Mini/Storage Facility. October 3.
- 2019a Drainage Study for Peñasquitos RV & Mini Storage. January.
- 2019b Priority Development Project Storm Water Quality Management Plan for Peñasquitos RV & Mini Storage. January.

LOS Engineering

- 2019 Transportation Access Analysis - Sun Ridge Vista RV/Mini Storage Facility. City of San Diego. February.

Project Design Consultants

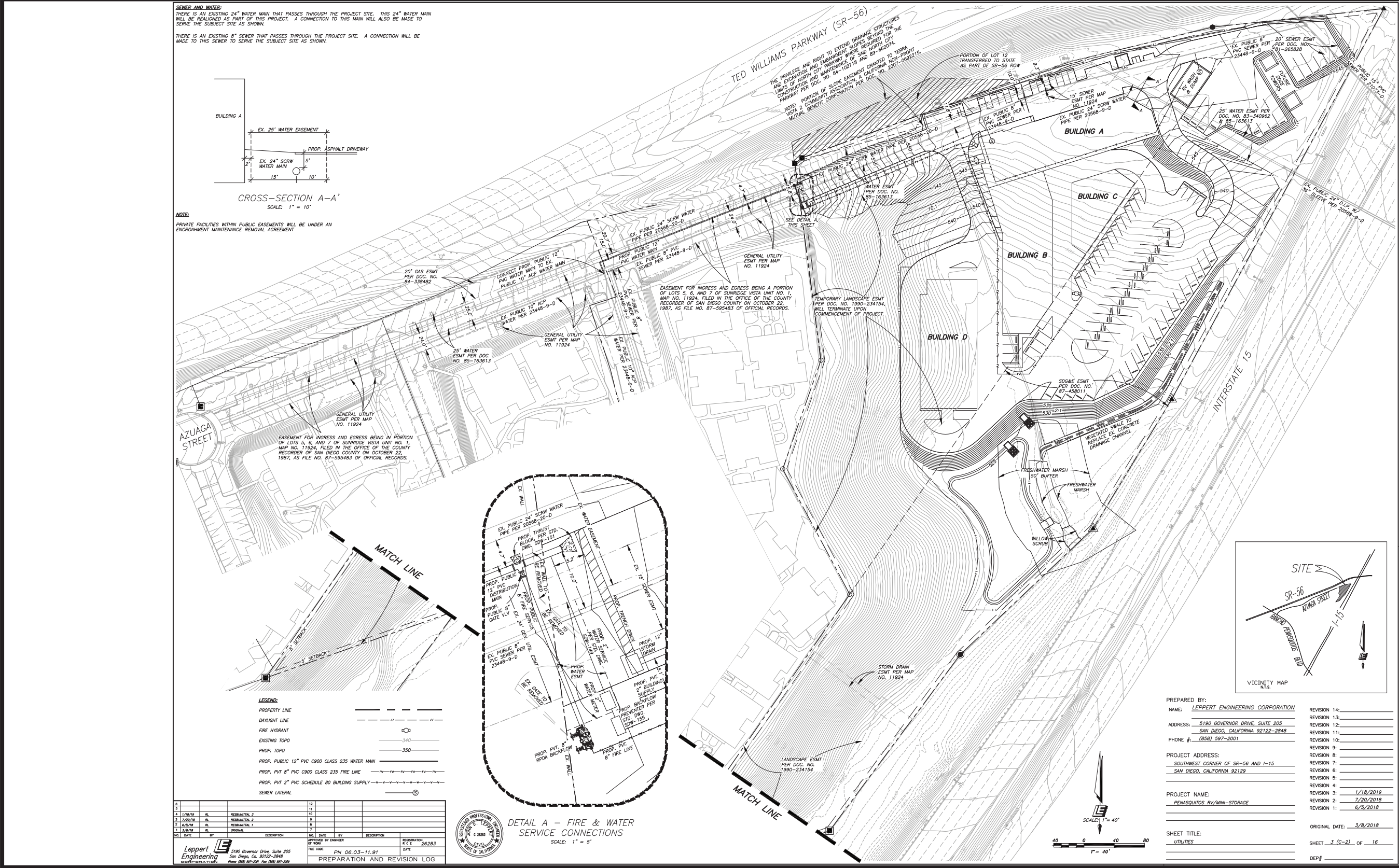
- 2018 Plan Set - Landscape Plan. Sheets L1 and L2.

RECON Environmental, Inc. (RECON)

- 2018a CalEEMod Outputs - Rancho Peñasquitos RV/Mini Storage Facility - San Diego County APCD Air District, Summer and Winter. October 29.
- 2018b Recommendation to Remove the Cultural Resources Mitigation Monitoring Requirement for Project Grading for the Sun Ridge Vista RV/Mini Storage Project. October 16.
- 2019a Biological Technical Report for the Sun Ridge Vista RV/Mini Storage Project. January 15.
- 2019b Noise Analysis for the Sun Ridge Vista RV/Mini Storage Project. January 8.
- 2019c Historical Resources Survey Report for Sun Ridge Vista RV/Mini Storage Project. January 8.

Sillman Wright Architects

- 2018 Plan Set - Code Analysis (Sheet A100- A101), Floor Plans (Sheets A100 - A105), Cross Sections (Sheet A201), Exterior Elevations (Sheets A 301 and A 302).



Site Plan
Sun Ridge Vista RV/Mini Storage/Project No. 534380
City of San Diego Development Services Department

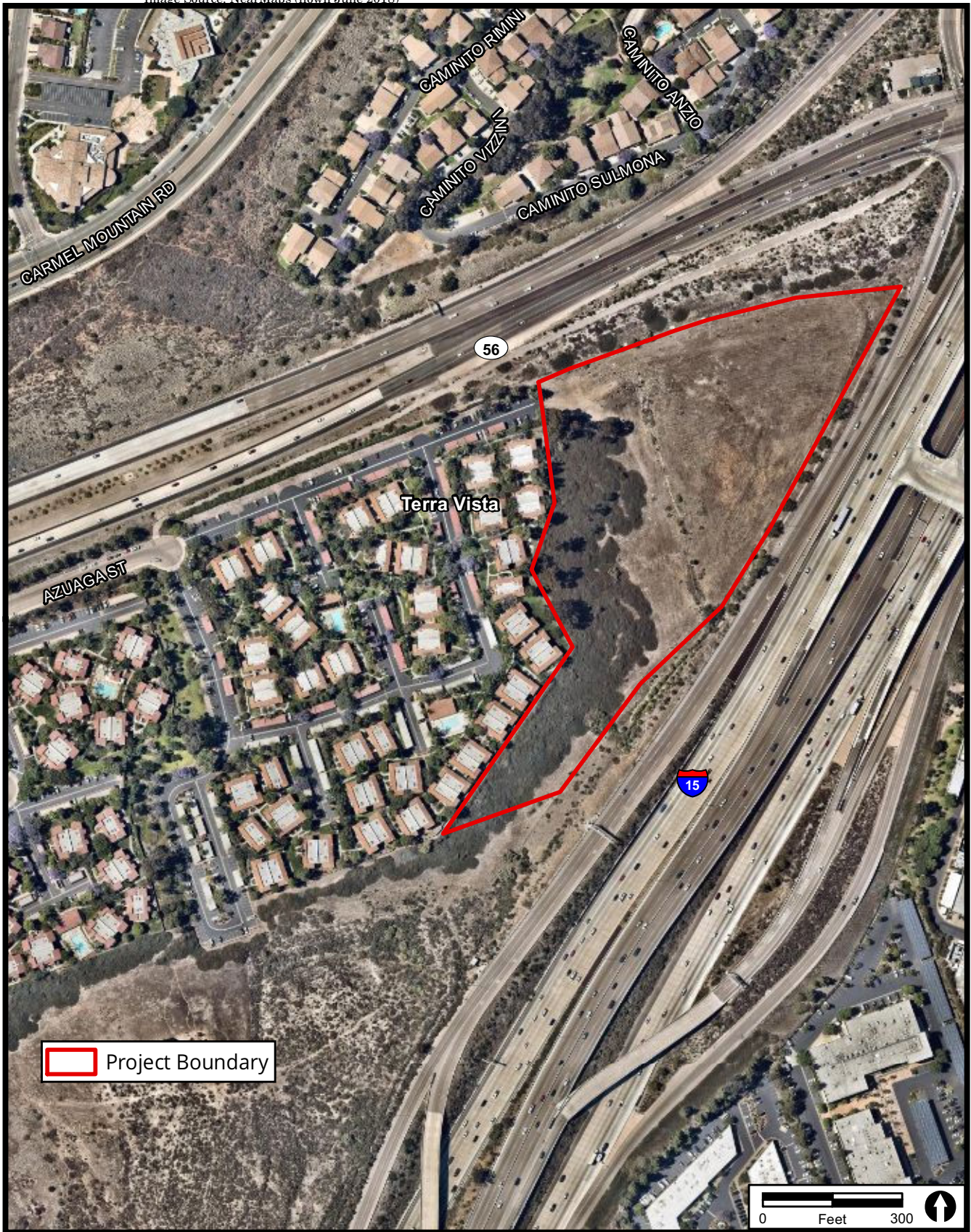
FIGURE
No. 1



Regional Location

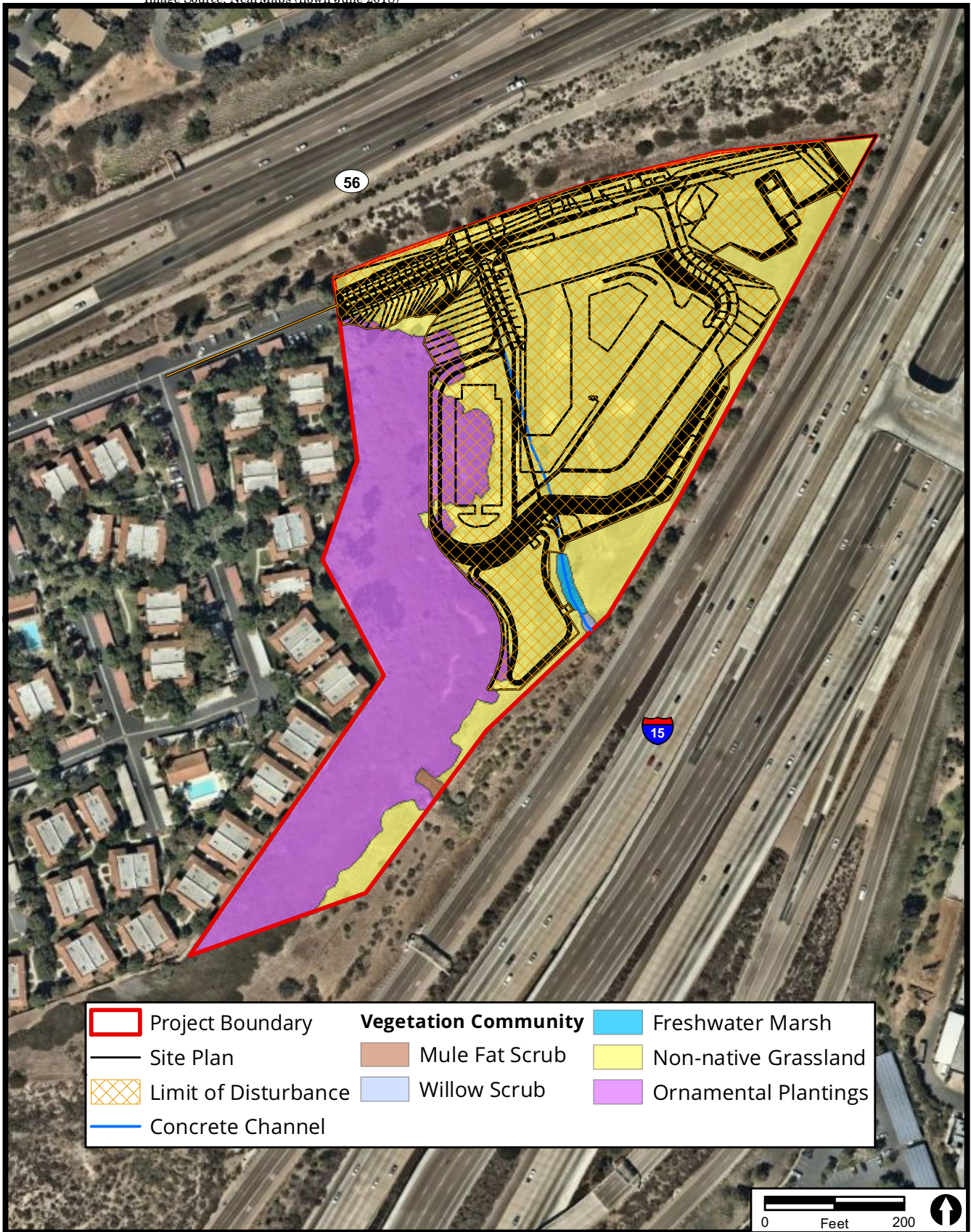
Sun Ridge Vista RV/Mini Storage/Project No. 534380
City of San Diego – Development Services Department

FIGURE
No. 2



Project Location on Aerial Photograph
Sun Ridge Vista RV/Mini Storage/Project No. 534380
City of San Diego – Development Services Department

**FIGURE
No. 3**



Biological Resources

Sun Ridge Vista RV/Mini Storage/Project No. 534380
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FIGURE
No. 4

Sun Ridge Vista RV/Mini Storage/Project No. 534380
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