

MITIGATED NEGATIVE DECLARATION

THE CITY OF SAN DIEGO

Project No. 586276 SCH No. *Not Applicable*

SUBJECT: U-STOR-IT CDP: COASTAL DEVELOPMENT PERMIT to demolish the existing 6,301square-foot commercial bank building and associated surface parking for the development of a five-story self-storage facility. Three floors would be above grade, approximately 91,712-square-feet, and two floors would be below grade, approximately 63,340 square feet. The building would be comprised of approximately 155,052 square feet of total gross area that includes: 68,352 square feet of storage area; 980 square feet of office area; 1,837 square feet of retail space; and, 21,523 square feet of parking area. The project would also construct associated site improvements (i.e. hardscape, site utilities, drainage improvements, landscaping, site access, parking, and walls). The project site is located within the Promise Zone and is in conformance with the criteria of the Affordable/In-fill Housing and Sustainable Buildings Expedite Program. The 0.807acre site is located at 2209 National Avenue. The site is designated Residential/Commercial/Industrial and zoned IH-2-1 in Sub-District B of the Barrio Logan Planned District within the Barrio Logan/101 Harbor Community Plan area. Additionally, the site is within the Coastal Overlay Zone (Non-Appealable Area 2), Airport Influence Area (San Diego International Airport - Review Area 2), the Federal Aviation Administration Part 77 Noticing Area (San Diego International Airport and North Island Naval Air Station), the Promise Zone Overlay, the Parking Impact Overlay Zone (Coastal-Impact), Transit Area Overlay Zone, Transit Priority Area Overlay, Affordable Housing Parking Demand Overlay (Medium), and the Outdoor Lighting Zone (Lighting Zone 2-Medium). (Legal Description: Lots 3, 4, and 39 through 48 in Block 126 of the San Diego Land and Town Company's Addition, Map No. 379, filed in the office of the County Recorder of San Diego County October 30, 1886). Applicant: Chicago Capital Finds, LLC / U-Stor-It Barrio Logan LLC.

I. PROJECT DESCRIPTION:

See attached Initial Study.

II. ENVIRONMENTAL SETTING:

See attached Initial Study.

III. DETERMINATION:

The City of San Diego conducted an Initial Study which determined that the proposed project could have a significant environmental effect in the following areas(s): **Paleontological Resources**. Subsequent revisions in the project proposal create the specific mitigation identified in Section V of this Mitigated Negative Declaration. The project as revised now avoids or mitigates the potentially significant environmental effects previously identified, and the preparation of an Environmental Impact Report will not be required.

IV. DOCUMENTATION:

The attached Initial Study documents the reasons to support the above Determination.

V. MITIGATION, MONITORING AND REPORTING PROGRAM:

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

- 1. Prior to the issuance of a Notice to Proceed (NTP) for a subdivision, or 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 Mitigation Monitoring and Reporting Program (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 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/standtemp.shtml

4. The **TITLE INDEX SHEET** must also show on which pages the "Environmental/Mitigation Requirements" notes are provided.

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 consultants: **Qualified Paleontological Monitor**.

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

CONTACT INFORMATION:

2.

- a) The PRIMARY POINT OF CONTACT is the **RE** at the **Field Engineering Division, 858-627-3200.**
- b) For Clarification of ENVIRONMENTAL REQUIREMENTS, it is also required to call **RE and MMC at 858-627-3360.**
- MMRP COMPLIANCE: This Project, Project Tracking System (PTS) Number
 586276 and/or Environmental Document Number 586276, 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: *Not Applicable*
- 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 will be performed. When necessary for clarification, a detailed methodology of how the work will be performed shall be included.

Note: Surety and Cost Recovery – When deemed necessary by the DSD 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 | | |
| Paleontology | Paleontology Reports | Paleontology Site Observation | | |
| Waste Management | Waste Management Reports | Waste Management Inspections | | |
| Bond Release | Request for Bond Release Letter | Final MMRP Inspections Prior to Bond Release Letter | | |

C. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

Paleontological Resources

I. Prior to Permit Issuance

- A. Entitlements Plan Check
 - Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans, but prior to the first precon meeting, whichever is applicable, the ADD Environmental designee shall verify that the requirements for paleontological monitoring have been noted on the appropriate construction documents.
- B. Letters of Qualification have been submitted to ADD
 - 1. The applicant shall submit a letter of verification to MMC identifying the PI for the project and the names of all persons involved in the paleontological monitoring program, as defined in the City Paleontology Guidelines.
 - 2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the paleontological monitoring of the project.
 - 3. Prior to the start of work, the applicant shall obtain approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

- A. Verification of Records Search
 - 1. The PI shall provide verification to MMC that a site-specific records search has been completed. Verification includes, but is not limited to a copy of a confirmation letter from San Diego Natural History Museum, other institution or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
 - 2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.
- B. PI Shall Attend Precon Meetings
 - 1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a precon meeting that shall include the PI, CM, and/or Grading Contractor, RE, BI, if appropriate, and MMC. The qualified paleontologist shall attend any grading/excavation related precon meetings to make comments and/or suggestions concerning the paleontological monitoring program with the CM and/or Grading Contractor.
 - a. If the PI is unable to attend the precon meeting, the Applicant shall schedule a focused precon meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.
 - 2. Identify Areas to be Monitored Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits. The PME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).
- 3. When Monitoring Will Occur
 - a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.
 - b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate conditions such as depth of excavation and/or site graded to bedrock, presence or absence of fossil resources, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

- A. Monitor Shall be Present During Grading/Excavation/Trenching
 - 1. The monitor shall be present full time during grading/excavation/ trenching activities as identified on the PME that could result in impacts to formations with high and moderate resource sensitivity. The CM is

responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances OSHA safety requirements may necessitate modification of the PME.

- 2. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as trenching activities that do not encounter formational soils as previously assumed, and/or when unique/unusual fossils are encountered, which may reduce or increase the potential for resources to be present.
- 3. The monitor shall document field activity via the CSVR. The CSVRs shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC.
- B. Discovery Notification Process
 - 1. In the event of a discovery, the Paleontological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate.
 - 2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
 - 3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.
- C. Determination of Significance
 - 1. The PI shall evaluate the significance of the resource.
 - a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required. The determination of significance for fossil discoveries shall be at the discretion of the PI.
 - b. If the resource is significant, the PI shall submit a Paleontological Recovery Program (PRP) and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume.
 - c. If resource is not significant (e.g., small pieces of broken common shell fragments or other scattered common fossils), the PI shall notify the RE, or BI as appropriate, that a non-significant discovery has been made. The Paleontologist shall continue to monitor the area without notification to MMC unless a significant resource is encountered.
 - d. The PI shall submit a letter to MMC indicating that fossil resources will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.

IV. Night and/or Weekend Work

- A. If night and/or weekend work is included in the contract.
 - When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.
 - 2. The following procedures shall be followed.
 - a. No Discoveries In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSVR and submit to MMC via fax by 8 A.M. on the next business day.
 - Discoveries All discoveries shall be processed and documented using the existing procedures detailed in Section III - During Construction.
 - c. Potentially Significant Discoveries If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III During Construction shall be followed.
 - d. The PI shall immediately contact MMC, or by 8 A.M. on the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.
- B. If night work becomes necessary during the course of construction
 - 1. The CM shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
 - 2. The RE, or BI, as appropriate, shall notify MMC immediately.
- C. All other procedures described above shall apply, as appropriate.

V. Post Construction

- A. Preparation and Submittal of Draft Monitoring Report
 - The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Paleontological Guidelines which describes the results, analysis, and conclusions of all phases of the paleontological monitoring program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring,
 - a. For significant paleontological resources encountered during monitoring, the paleontological recovery program shall be included in the Draft Monitoring Report.
 - b. Recording Sites with the San Diego Natural History Museum The PI shall be responsible for recording (on the appropriate forms) any significant or potentially significant fossil resources encountered during the paleontological monitoring program in accordance with the City's Paleontological Guidelines, and submittal of such forms to the San Diego Natural History Museum with the Final Monitoring Report.
 - 2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.
 - 3. The PI shall submit revised Draft Monitoring Report to MMC for approval.
 - 4. MMC shall provide written verification to the PI of the approved report.

- 5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.
- B. Handling of Fossil Remains
 - 1. The PI shall be responsible for ensuring that all fossil remains collected are cleaned and catalogued.
 - The PI shall be responsible for ensuring that all fossil remains are analyzed to identify function and chronology as they relate to the geologic history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.
- C. Curation of fossil remains: Deed of Gift and Acceptance Verification
 - 1. The PI shall be responsible for ensuring that all fossil remains associated with the monitoring for this project are permanently curated with an appropriate institution.
 - 2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.
- D. Final Monitoring Report(s)
 - 1. The PI shall submit two copies of the Final Monitoring Report to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.
 - 2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

VI. PUBLIC REVIEW DISTRIBUTION:

Draft copies or notice of this Mitigated Negative Declaration were distributed to:

City of San Diego Mayor's Office (91) Councilmember Alverez, District 8 (MS 10A) **Development Services Department** EAS **Planning Review** Landscaping Engineering **Transportation Development** Geology **Plan-Historic** DPM **Planning Department Plan-Facilities Financing Plan-Airport** Library Department - Government Documents (81) Central Library (81A) Logan Heights Branch (81N)

Environmental Services Department (93A) Facilities Financing (MS 93B) City Attorney's Office (93C)

Other Organizations, Groups and Interested Individuals Barrio Logan (240) Barrio Station Inc. (241) Harborview Community Council (245) Clint Linton, lipay Nation of Santa Ysabel Lisa Cumper, Jamul Indian Village Chicago Capital Finds, LLC, Applicant U-Stor-It Barrio Logan LLC, Applicant Permit Solutions, Agent

VII. RESULTS OF PUBLIC REVIEW:

- (X) No comments were received during the public input period.
- () Comments were received but did not address the accuracy or completeness of the draft environmental document. No response is necessary, and the letters are incorporated herein.
- () Comments addressing the accuracy or completeness of the draft environmental document were received during the public input period. The letters and responses are incorporated herein.

Copies of the draft Mitigated Negative Declaration, the Mitigation, Monitoring and Reporting Program and any Initial Study material are available in the office of the Development Services Department for review, or for purchase at the cost of reproduction.

E. Shearer-Nguyen Senior Planner Development Services Department

Analyst: Shearer-Nguyen

August 27, 2018 Date of Draft Report

September 27, 2018 Date of Final Report

Attachments: Initial Study Checklist Figure 1 – Location Map Figure 2 – Site Plan

INITIAL STUDY CHECKLIST

- 1. Project title/Project number: U-Stor-It CDP / 586276
- 2. Lead agency name and address: City of San Diego, 1222 First Avenue, MS-501, San Diego, California, 92101
- 3. Contact person and phone number: E. Shearer-Nguyen / (619) 446-5369
- 4. Project location: 2209 National Avenue, San Diego CA 92106
- 5. Project Applicant/Sponsor's name and address: U-Stor-It Barrio Logan, LLC, 501 Broadway, Suite 2020, San Diego, California 92101
- 6. General/Community Plan designation: Residential/Commercial/Industrial
- 7. Zoning: IH-2-1
- 8. Description of project (Describe the whole action involved, including but not limited to, later phases of the project, and any secondary, support, or off-site features necessary for its implementation.):

A request for a COASTAL DEVELOPMENT PERMIT to demolish the existing 6,301-square-foot commercial bank building and associated surface parking for the development of a five-story self-storage facility. Three floors would be above grade, approximately 91,712-square-feet, and two floors would be below grade, approximately 63,340 square feet. The building would be comprised of approximately 155,052 square feet of total gross area that includes: 68,352 square feet of storage area; 980 square feet of office area; 1,837 square feet of retail space; and, 21,523 square feet of parking area. The project would also construct associated site improvements (i.e. hardscape, site utilities, drainage improvements, landscaping, site access, parking, and walls). The project site is located within the Promise Zone and is in conformance with the criteria of the Affordable/In-fill Housing and Sustainable Buildings Expedite Program.

The project would require 19 on-site parking spaces. Project landscaping includes a variety of trees, shrubs, vines, and ground cover consistent with the City's Landscape Regulations. Project grading would include the excavation of approximately 18,102 cubic yards of grading with a cut depth of 19.84 feet. Retaining walls on-site would range from approximately three to five feet in height. Total combined linear length of retaining walls on-site would be approximately 250 feet. Drainage would also be provided consistent with the City's Storm Water Regulations and would be directed into appropriate storm drain systems designated to carry surface runoff, which has been reviewed and accepted by City Engineering staff.

9. Surrounding land uses and setting:

The 0.807-acre site is located at 2209 National Avenue. The site is located on the northwest corner of National Avenue and Sampson Street. The site has been previously developed with a commercial building with associated surface parking and non-native landscaping. The site is relatively flat. The project site is situated in a neighborhood setting of similar uses (commercial). In addition, the project site is in a developed area currently served by existing public services and utilities.

The site is designated Residential/Commercial/Industrial and zoned IH-2-1 in Sub-District B of the Barrio Logan Planned District within the Barrio Logan/101 Harbor Community Plan area. Additionally, the site is designated Residential/Commercial/Industrial and zoned IH-2-1 in Sub-District B of the Barrio Logan Planned District within the Barrio Logan/101 Harbor Community Plan area. Additionally, the site is within the Coastal Overlay Zone (Non-Appealable Area 2), Airport Influence Area (San Diego International Airport – Review Area 2), the Federal Aviation Administration Part 77 Noticing Area (San Diego International Airport and North Island Naval Air Station), the Promise Zone Overlay, the Parking Impact Overlay Zone (Coastal-Impact), Transit Area Overlay Zone, Transit Priority Area Overlay, Affordable Housing Parking Demand Overlay (Medium), and the Outdoor Lighting Zone (Lighting Zone 2-Medium).

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

None required.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?

In accordance with the requirements of Public Resources Code 21080.3.1, the City of San Diego provided formal notifications to the lipay Nation of Santa Isabel and the Jamul Indian Village, both traditionally and culturally affiliated with the project area, requesting consultation via email on March 15, 2018. Consultation occurred and was concluded on March 16, 2018.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

| | Aesthetics | Hazards & Hazardous Material | | Recreation |
|-----------|------------------------------------|------------------------------|-------------|------------------------------------|
| | Agriculture and Forestry Resources | Hydrology/Water Quality | | Transportation/Traffic |
| | Air Quality | Land Use/Planning | | Tribal Cultural Resources |
| | Biological Resources | Mineral Resources | | Utilities/Service System |
| \bowtie | Cultural Resources | Noise | \boxtimes | Mandatory Findings of Significance |
| | Geology/Soils | Population/Housing | | |
| | Greenhouse Gas Emissions | Public Services | | |

DETERMINATION: (To be completed by Lead Agency)

On the basis of this initial evaluation:

- The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- Although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- The proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (a) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (b) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required.
- Although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or (MITIGATED) NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or (MITIGATED) NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact answer should be explained where it is based on project specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis.)
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant.
 "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses", as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or (mitigated) negative declaration. *Section* 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated", describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a. The significance criteria or threshold, if any, used to evaluate each question; and
 - b. The mitigation measure identified, if any, to reduce the impact to less than significant.

| Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact | | |
|---|--------------------------------------|---|------------------------------------|-------------|--|--|
| I. AESTHETICS – Would the project: | | | | | | |
| a) Have a substantial adverse effect on a scenic vista? | | | | \boxtimes | | |

The community plan does not identify any scenic vistas. The project proposes a maximum development height of five stories (three stories above grade and two stories below grade). Public views, scenic corridors, and/or scenic vistas do not exist on the project site or in the immediate project area. Therefore, no impact to scenic vistas would result.

| b) | Substantially damage scenic resources, | | |
|----|---|--|--|
| | including but not limited to, trees, rock | | |
| | outcroppings, and historic buildings | | |
| | within a state scenic highway? | | |

The project site has been graded and previously disturbed and is currently developed with an existing commercial structure with surface parking. There are no scenic resources (trees, rock outcroppings, or historic buildings) located on the project site. The project would not result in the physical loss, isolation, or degradation of a community identification symbol or landmark, as none are identified by the General Plan or community plan as occurring in the project vicinity. In addition, there are no scenic resources adjacent to the project site. The project would not substantially damage scenic resources along a State Scenic Highway or local roadway. No impacts would result.

| c) | Substantially degrade the existing visual | | | |
|----|---|--|-------------|--|
| | character or quality of the site and its | | \boxtimes | |
| | surroundings? | | | |

The project site is developed with a commercial building and surface parking. Surrounding the project are one-, two- and three-story commercial buildings. The project proposes a maximum height of three stories, which is within the allowable height and bulk regulations of the underlying zone and would not exceed the height and/or bulk of building in the surrounding neighborhood.

As described, the project is consistent with the community plan and underlying zone designations and therefore would be compatible with the surrounding neighborhood and development. As such, the project would not substantially degrade the visual character and quality of the site or the surrounding area. Impacts would be less than significant.

| d) | Create a new source of substantial light | | | |
|-----|--|--|-------------|--|
| - / | or glare that would adversely affect day | | \boxtimes | |
| | or nighttime views in the area? | | | |

Lighting

The project site is currently developed. The project site is a source of light in the form of perimeter lighting. The project area already has several lighting sources, such as streetlights. Other sources of light in the area include light from homes and lighting for the commercial elements, parking lighting, and security lighting. However, the project would not create a new source of substantial light that would adversely affect daytime or nighttime views in the area. Lighting would be regulated by compliance with Section 142.0740 of the City of San Diego Land Development Code.

| Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|-------|--------------------------------------|---|------------------------------------|-----------|
|-------|--------------------------------------|---|------------------------------------|-----------|

Overall, no substantial sources of lighting would be generated during construction, as construction activities would occur during daylight hours. Furthermore, the contribution of light emitted from the project site would not be substantial; all permanent exterior lighting would be required to comply with the City lighting regulations. Impacts would be less than significant.

Glare

No single elevation of the project's exterior would incorporate glass material having a light reflectivity greater than 30 percent, consistent with Section 142.0730 of the Land Development Code. Those areas that would provide glass material would not result in the reflection of natural or artificial light off of the glass and represent a safety impacts to motorists on surrounding roadways. Impact would be less than significant.

As such, the project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area; impacts would be less than significant.

II. AGRICULTURAL AND FOREST RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. – Would the project:

| a) | Converts Prime Farmland, Unique Farmland, or Farmland of Statewide | | |
|----|---|--|--|
| | Importance (Farmland), as shown on the maps prepared pursuant to the | | |
| | Farmland Mapping and Monitoring | | |
| | Program of the California Resources | | |
| | Agency, to non-agricultural use? | | |

The project site does not contain prime farmland, unique farmland, or farmland of Statewide Importance as designated by the California Department of Conservation. Agricultural land is not present on the site or in the general vicinity. No impact would result.

| b) | Conflict with existing zoning for | | | | | | |
|----|---------------------------------------|--|--|--|-------------|--|--|
| | agricultural use, or a Williamson Act | | | | \boxtimes | | |
| | Contract? | | | | | | |

Refer to II.a., above. There are no Williamson Act Contract Lands on or within the vicinity of the site. Furthermore, the project would not affect any properties zoned for agricultural use or affected by a Williamson Act Contract, as there are none within the project vicinity. Agricultural land is not present on the site or in the general vicinity of the site; therefore, no conflict with the Williamson Act Contract would result. No impact would result.

| Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
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| c) Conflict with existing zoning for, c cause rezoning of, forest land (as defined in Public Resources Code section 1220(g)), timberland (as d by Public Resources Code section 4526), or timberland zoned Timber Production (as defined by Govern Code section 51104(g))? | efined | | | |

The project would not conflict with existing zoning for or cause a rezoning of forest land, timberland, or timberland zoned Timberland Production. No designated forest land or timberland occur on-site. No impact would result.

| d) | Result in the loss of forest land or | | |
|----|---|--|-------------|
| | conversion of forest land to non-forest | | \boxtimes |
| | use? | | |

Refer to II.c., above. The project would not contribute to the conversion of any forested land to nonforest use, as surrounding land uses are built out. No impact would result.

| e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non- agricultural use or conversion of forest land to non-forest use? | | | | \boxtimes |
|--|--|--|--|-------------|
|--|--|--|--|-------------|

Refer to II.a. through d., above. No impact would result.

- III. AIR QUALITY Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied on to make the following determinations Would the project:

The project site is located in the San Diego Air Basin (SDAB) and is under the jurisdiction of the San Diego Air Pollution Control District (SDAPCD) and the California Air Resources Board (CARB). Both the State of California and the Federal government have established health-based Ambient Air Quality Standards (AAQS) for the following six criteria pollutants: carbon monoxide (CO); ozone (O3); nitrogen oxides (NOx); sulfur oxides (SOx); particulate matter up to 10 microns in diameter (PM10); and lead (Pb). O₃ (smog) is formed by a photochemical reaction between NOx and reactive organic compounds (ROCs). Thus, impacts from O₃ are assessed by evaluating impacts from NOx and ROCs. A new increase in pollutant emissions determines the impact on regional air quality as a result of a proposed project. The results also allow the local government to determine whether a proposed project would deter the region from achieving the goal of reducing pollutants in accordance with the Air Quality Management Plan (AQMP) in order to comply with Federal and State AAQS.

The SDAPCD and San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the SDAB. The County Regional Air Quality Strategy (RAQS) was initially adopted in 1991

| Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
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and is updated on a triennial basis (most recently in 2009). The RAQS outlines the SDAPCD's plans and control measures designed to attain the state air quality standards for ozone (O_3). The RAQS relies on information from the CARB and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in San Diego County and the cities in the county, to project future emissions and then determine the strategies necessary for the reduction of emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by San Diego County and the cities in the county as part of the development of their general plans.

The RAQS relies on SANDAG growth projections based on population, vehicle trends, and land use plans developed by the cities and by the county as part of the development of their general plans. As such, projects that propose development that is consistent with the growth anticipated by local plans would be consistent with the RAQS. However, if a project proposes development that is greater than that anticipated in the local plan and SANDAG's growth projections, the project might be in conflict with the RAQS and may contribute to a potentially significant cumulative impact on air quality.

The project is consistent with the General Plan, Barrio Logan Community Plan, and the underlying zone. Therefore, the project would be consistent at a sub-regional level with the RAQS and would not obstruct implementation of the RAQS. No impacts would result

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Short-Term (Construction) Emissions

Project construction activities could potentially generate combustion emissions from on-site heavyduty construction vehicles and motor vehicles transporting the construction crew and necessary construction materials. Exhaust emissions generated by construction activities would generally result from the use of typical construction equipment that may include excavation equipment, forklift, skip loader, and/or dump truck. Variables that factor into the total construction emissions potentially generated include the level of activity, length of construction period, number of pieces and types of equipment in use, site characteristics, weather conditions, number of construction personnel, and the amount of materials to be transported on- or off-site. It is anticipated that construction equipment would be used on-site for four to eight hours per day; however, construction would be short-term (approximately 16 months, including demolition), and impacts to neighboring uses would be minimal and temporary.

Demolition, excavation, and grading can cause fugitive dust emissions. Construction of the project would be subject to standard measures required by a City of San Diego grading permit to reduce potential air quality impacts to less than significant. These measures include, but are not limited to, compliance with SDMC 142.0710, which prohibits airborne contaminants from emanating beyond the boundaries of the premises upon which the use emitting the contaminants is located. Some example measures are watering three times daily, reducing vehicle speeds to 15 miles per hour on unpaved or use architectural coatings that comply with San Diego Air Pollution Control District Rule 67.0 [i.e., architectural coatings that meet a volatile organic compounds (VOC) content of 100 grams per liter (g/l) for interior painting and 150 g/l for exterior painting] would be used during

| Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
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construction. Therefore, impacts associated with fugitive dust are considered less than significant and would not violate an air quality standard or contribute substantially to an existing or projected air quality violation.

Long-Term (Operational) Emissions

Long-term air emission impacts are those associated with stationary sources and mobile sources related to any change caused by a project. After construction, air emissions from the project could result from heating, ventilation, and cooling (HVAC) systems typically associated with commercial uses. The project is compatible with the surrounding commercial/residential development and is permitted by the community plan and zoning designation. The project is anticipated to generate approximately 384 average daily trips (ADT), with 24 AM peak hour trips and 37 PM peak hour trips, and no significant impacts to traffic volumes would occur. The project would not generate traffic volumes that warrant preparation of a traffic study. Therefore, automobile emissions that result in violation of air quality standards are not anticipated to violate any air quality standard or contribute substantially to any existing or projected air quality violations. Impacts would be less than significant.

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

The SDAB is considered a non-attainment under Federal standards for O_3 (8-hour standard). As described above in response III(b), construction operations temporarily increase the emissions of dust and other pollutants. However, construction emissions would be temporary and short-term in duration. Implementation of Best Management Practices (BMPs) would reduce potential impacts related to construction activities to a less than significant level.

Construction of the project in the region would not create considerable ozone or PM₁₀ from construction and operation. Therefore, the project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under applicable federal or state ambient air quality standards. Impacts would be less than significant.

| d) | Create objectionable odors affecting a | | \square | |
|----|--|--|-----------|--|
| | substantial number of people? | | | |

Short-Term (Construction) Emissions

Project construction could result in minor amounts of odor compounds associated with diesel heavy equipment exhaust during construction. These compounds would be emitted in various amounts and at various locations during construction. Sensitive receptors are located near the project site; however, odors are highest near the source and would quickly dissipate away from the source. Also, construction activities would be temporary, and the main use of heavy equipment would be during the first stages of development. After construction is complete, there would be no objectionable

| Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
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odors associated with the project. Thus, the potential for odor impacts associated with the project is less than significant.

Long-Term (Operational) Emissions

Typical long-term operational characteristics of the project are not associated with the creation of such odors nor anticipated to generate odors affecting a substantial number of people. The project would not create uses that, in the long-term operation, would be typically associated with the creation of such odors nor are they anticipated to generate odors affecting a substantial number or people. Therefore, project operations would result in less than significant impacts.

| e) | Create objectionable odors affecting a | | \boxtimes | |
|----|--|--|-------------|--|
| | substantial number of people? | | | |

Short-Term (Construction) Emissions

Project construction could result in minor amounts of odor compounds associated with diesel heavy equipment exhaust during construction. These compounds would be emitted in various amounts and at various locations during construction. Sensitive receptors include the residences to the north, northeast, and east of the project site. However, odors are highest near the source and would quickly dissipate away from the source. Also, construction activities would be temporary, and the main use of heavy equipment would be during the first stages of development. After construction is complete, there would be no objectionable odors associated with the project. Thus, the potential for odor impacts associated with the project is less than significant.

Long-Term (Operational) Emissions

Typical long-term operational characteristics of the project are not associated with the creation of such odors nor anticipated to generate odors affecting a substantial number of people. The project would not create uses that, in the long-term operation, would be typically associated with the creation of such odors nor are they anticipated to generate odors affecting a substantial number or people. Therefore, project operations would result in less than significant impacts.

IV. BIOLOGICAL RESOURCES – Would the project:



The project site is developed within an urbanized area. No native habitat is located on-or adjacent to the site. As such, the project would not directly or through habitat modification effect any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or USFW. No impacts would occur.

| b) | Have a substantial adverse effect on | | |
|----|---|--|-------------|
| | any riparian habitat or other community identified in local or | | \boxtimes |
| | regional plans, policies, and regulations | | |

| Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
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| or by the California Department of and Game or U.S. Fish and Wildlife Service? | | | | |

Refer to IV.a., above. The project would not directly or indirectly impact any riparian habitat or other plant community. No impact would result.

| c) | Have a substantial adverse effect on federally protected wetlands as defined by section 404 of the Clean Water Act (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | | | | |
|----|---|--|--|--|--|
|----|---|--|--|--|--|

The project site is developed and does not contain any Federally protected wetlands as defined by Section 404 of the Clean Water Act. Therefore, no impacts would result. Also, refer to IV.a. above.

| d) | Interfere substantially with the | | |
|----|---|--|-------------|
| | movement of any native resident or | | |
| | migratory fish or wildlife species or with established native resident or | | \boxtimes |
| | migratory wildlife corridors, or impede | | |
| | the use of native wildlife nurserv sites? | | |

No formal and/or informal wildlife corridors are located on or near the project, as the site is located within an urbanized area. No impacts would result. Also, refer to IV.a., above.

| e) | Conflict with any local policies or | | |
|----|---|--|-------------|
| | ordinances protecting biological resources, such as a tree preservation | | \boxtimes |
| | policy or ordinance? | | |

Refer to IV.a., above. The project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. No impacts would result.

| f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | | | | |
|--|--|--|--|--|
|--|--|--|--|--|

The City is a participant in the Multiple Species Conservation Program (MSCP), a comprehensive, long-term habitat conservation program designed to provide permit issuance authority for take of covered species to the local regulatory agencies. The MSCP is implemented in the City through the Subarea Plan. Although the project is within a Development Area identified in the Subarea Plan, it has not been identified as a strategic preserve, nor is it located within or adjacent to the Multi-Habitat Planning Area (MHPA); more specifically, the project site is identified as a developed community within the Urban Area. There are no other policies or ordinances that apply to the project. Furthermore, the project would not conflict with the provisions of any other adopted

| Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
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Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. No impacts would occur.

| V. | CULTURAL | RESOURCES - | Would the | project: |
|----|----------|--------------------|-----------|----------|
| | | | | |

| a) | Cause a substantial adverse change in | | |
|----|---------------------------------------|--|-------------|
| | the significance of an historical | | \boxtimes |
| | resource as defined in §15064.5? | | |

The purpose and intent of the Historical Resources Regulations of the Land Development Code (Chapter 14, Division 3, and Article 2) is to protect, preserve and, where damaged, restore the historical resources of San Diego. The regulations apply to all proposed development within the City of San Diego when historical resources are present on the premises. Before approving discretionary projects, CEQA requires the Lead Agency to identify and examine the significant adverse environmental effects which may result from that project. A project that may cause a substantial adverse change in the significance of a historical resource may have a significant effect on the environment (Sections 15064.5(b) and 21084.1). A substantial adverse change is defined as demolition, destruction, relocation, or alteration activities, which would impair historical significance (Sections 15064.5(b)(1)). Any historical resource listed in, or eligible to be listed in the California Register of Historical Resources, including archaeological resources, is historically or culturally significant.

The City of San Diego criteria for determination of historic significance, pursuant to CEQA, is evaluated based upon age (over 45 years), location, context, association with an important event, uniqueness, or structural integrity of the building. Projects requiring the demolition and/or modification of structures that are 45 years or older have the potential to result in potential impacts to a historical resource. The existing structures were identified as being over 45 years in age. Therefore, Assessor's Building Records, water and sewer records, Chain of title, and a photographic survey for the project site were submitted and reviewed by qualified Plan-Historic staff. City staff determined that the property and/or structure is not individually designated resource and is not located within a designated historic district. Furthermore, the property does not meet designation criteria as a significant resource under any adopted criteria. No impact would result.



The project site is located within a high sensitivity area on the City of San Diego's Historical Resources Sensitivity Map. Therefore, a record search of the California Historic Resources Information System (CHRIS) digital database was reviewed to determined presence or absence of potential resources within and/or adjacent to the project site by qualified archaeological City staff. Based on the CHRIS records search, recorded archaeological resources were not identified within or adjacent to the project site. Furthermore, the project site has been previously graded to allow for the existing. Therefore, it was determined that there is no potential to impact any unique or nonunique historical resources and no further work would be required. No impact would result.

| c) | Directly or indirectly destroy a unique | |
|----|---|--|
| | paleontological resource or site or | |
| | unique geologic feature? | |

 \boxtimes

| lssue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
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According to Geotechnical Report, the project site is underlain by Old Paralic Deposits, formerly known as the Baypoint formation. According to the Significance Determination Thresholds of the City of San Diego, Old Paralic Deposits has a high sensitivity for paleontological resources. Projects in high sensitivity that excavate more than 1,000 cubic yards to a depth of ten feet or more require paleontological monitoring during grading activities to mitigate for potential effects on paleontological resources.

The project proposes approximately 18,102 cubic yards of cut to a depth of 19.84 feet within the structure footprint; therefore, the project could result in significant impacts to paleontological resources. Consequently, paleontological monitoring would be required during all grading and/or excavation activities

Therefore, a mitigation monitoring and reporting program, detailed within Section V of the Mitigated Negative Declaration, would be implemented to ensure that significant impacts to paleontological resources are reduced to below a level of significance.

| d) | Disturb and human remains, including | | |
|----|--------------------------------------|--|-------------|
| | those interred outside of dedicated | | \boxtimes |
| | cemeteries? | | |

As noted in V.a. above, it was determined that there is no potential to impact any unique or nonunique historical resources. Additionally, no formal cemeteries or human remains are known to exist on-site or in the vicinity. However, should human remains be discovered during grounddisturbing activities associated with redevelopment of the project site, work would be required to halt in that area and no soil would be exported off-site until a determination could be made regarding the provenance of the human remains via the County Coroner and Native American representative, as required. The project would be required to treat human remains uncovered during construction in accordance with the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5). No impact would result.

VI. GEOLOGY AND SOILS – Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:



The project site is within Geologic Hazard Zone 53 according to the *City of San Diego Safety Seismic Study Maps.* Hazard Category 53 is characterized by level or sloping terrain with unfavorable geologic structure, and a low to moderate risk. The project would be required to comply with the seismic requirements of the California Building Code, utilize proper engineering design and

| Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
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utilization of standard construction practices, to be verified at the building permit stage, that would reduce impacts to people or structures due to local seismic events to an acceptable level of risk. Therefore, impacts from regional geologic hazards would be less than significant.

| ii) | Strong seismic ground shaking? | | \boxtimes | |
|--------------|--|--|-------------|--|
| Refer to Sec | tion VI(a)(i). | | | |
| iii) | Seismic-related ground failure, including liquefaction? | | \boxtimes | |

Liquefaction is not anticipated to occur on the project site. The project would be required to comply with the seismic requirements of the California Building Code, utilize proper engineering design and utilization of standard construction practices, to be verified at the building permit stage, that would reduce impacts to people or structures due to local seismic events to an acceptable level of risk. Therefore, impacts from regional geologic hazards would be less than significant.

| iv) l | _andslides? | | | | \boxtimes |
|-------|-------------|--|--|--|-------------|
|-------|-------------|--|--|--|-------------|

Evidence of landslides were not observed on the project site, nor are there any geomorphic features indicative of landslides noted in the review of published geological maps. Further, given the relatively flat topography of the site, the likelihood for seismically induced landslides is remote. The project would be required to comply with the seismic requirements of the California Building Code, utilize proper engineering design and utilization of standard construction practices, to be verified at the building permit stage, that would reduce impacts to people or structures due to local seismic events to an acceptable level of risk. Therefore, impacts from regional geologic hazards would be less than significant.

| b) | Result in substantial soil erosion or the | | |
|----|---|--|--|
| | loss of topsoil? | | |

Demolition and construction activities would temporarily expose soils to increased erosion potential. However, the use of standard erosion control measures and implementation of storm water best management practices requirements consistent with the City's Storm Water Standards during construction would preclude impacts.

Grading activities within the site would also be required to comply with the City's Grading Ordinance as well as the Storm Water Standards, which would ensure soil erosion and topsoil loss is minimized to less than significant levels. Furthermore, permanent storm water BMPs would also be required post-construction consistent with the City's regulations. Therefore, the project would not result in substantial soils erosion or loss of topsoil, therefore impacts would be less than significant.



| Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
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The project site is located within geologic hazards zone 53 as shown on the City's Seismic Safety Study Zone 53 is characterized by level or sloping terrain with unfavorable geologic structure, low to moderate risk. As discussed in VI.a.iv and VI.a.iii, the project site is not likely to be subject to landslides, and the potential for liquefaction and subsidence is low. The soils and geologic units underlying the site are considered to have a "very low" to "medium" expansion potential.

The project would be constructed consistent with proper engineering design, in accordance with the California Building Code. Utilization of appropriate engineering design measures and standard construction practices, to be verified at the building permit stage, would ensure that potential impacts from geologic hazards would be reduced to an acceptable level of risk. As such impacts would be less than significant.

 Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

| | \boxtimes | |
|--|-------------|--|
| | | |

Refer to VI.c. The project would be constructed consistent with proper engineering design, in accordance with the California Building Code. Utilization of appropriate engineering design measures and standard construction practices, to be verified at the building permit stage, would ensure that potential impacts from geologic hazards would be reduced to an acceptable level of risk. Impacts would be less than significant.

| e) | Have soils incapable of adequately | | |
|----|--|--|-------------|
| | supporting the use of septic tanks or | | |
| | alternative waste water disposal | | \boxtimes |
| | systems where sewers are not available | | |
| | for the disposal of waste water? | | |

The project site would be served by the existing public sewer system. No impact would occur.

VII. GREENHOUSE GAS EMISSIONS – Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Climate Action Plan

The City adopted the Climate Action Plan (CAP) in December 2015 (City of San Diego 2015). With implementation of the CAP, the City aims to reduce emissions 15% below the baseline to approximately 11.1 million metric tons of carbon dioxide equivalent (MMT CO2E) by 2020, 40% below the baseline to approximately 7.8 MMT CO2E by 2030, and 50% below the baseline to approximately 6.5 MMT CO2E by 2035. The City has identified the following five CAP strategies to reduce GHG emissions to achieve the 2020 and 2035 targets: (1) energy- and water-efficient buildings; (2) clean and renewable energy; (3) bicycling, walking, transit, and land use; (4) zero waste (gas and waste management); and (5) climate resiliency. The City's CAP Consistency Checklist, adopted July 12, 2016, is the primary document used by the City to ensure project-by-project

| Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
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consistency with the underlying assumptions in the CAP and thereby to ensure that the City would achieve the emission reduction targets identified in its CAP.

CAP Consistency Checklist

The CAP Consistency Checklist is the City's significance threshold utilized to ensure project-byproject consistency with the underlying assumptions in the CAP and to ensure that the City would achieve its emission reduction targets identified in the CAP. The CAP Consistency Checklist includes a three-step process to determine project if the project would result in a GHG impact. Step 1 consists of an evaluation to determine the project's consistency with existing General Plan, Community Plan, and zoning designations for the site. Step 2 consists of an evaluation of the project's design features compliance with the CAP strategies. Step 3 is only applicable if a project is not consistent with the land use and/or zone, but is also in a transit priority area to allow for more intensive development than assumed in the CAP.

Under Step 1 of the CAP Consistency Checklist, the project is consistent with the existing General Plan and Barrio Logan Community Plan land use designations and zoning for the site. Therefore, the project is consistent with the growth projections and land use assumptions used in the CAP. Furthermore, completion of Step 2 of the CAP Consistency Checklist demonstrates that the project would be consistent with applicable strategies and actions for reducing GHG emissions. This includes project features consistent with the energy and water efficient buildings strategy, as well as bicycling, walking, transit, and land use strategy. Additionally, the project incorporates a roofmounted photovoltaic system consisting of solar panels sufficient to generate at least 30 percent of the project's projected energy consumption. These project features would be assured as a condition of project approval. Thus, the project is consistent with the CAP. Step 3 of the CAP Consistency Checklist would not be applicable, as the project is not proposing a land use amendment or a rezone.

Based on the project's consistency with the City's CAP Consistency Checklist, the project's contribution of GHGs to cumulative statewide emissions would be less than cumulatively considerable. Therefore, the project's direct and cumulative GHG emissions would have a less than significant impact on the environment.

| b) | Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | | | | | | |
|--|---|--|--|--|--|--|--|
| Refer to | Refer to Section VII(a). Impacts would be less than significant. | | | | | | |
| VIII. HAZARDS AND HAZARDOUS MATERIALS – Would the project: | | | | | | | |
| a) | Create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials? | | | | | | |

During project construction, small amounts of solvents and petroleum products could be utilized; and although minimal amounts of such substances may be present during construction, they are

| Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
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not anticipated to result in a significant hazard to the public. During the operational phase of the project, the routine transport, use or disposal of hazardous materials is not anticipated. Although small amounts of hazardous materials may be used for cleaning and maintenance, standard best management practices (BMPs) would be applied to ensure that all hazardous materials are handled and disposed of properly and that no hazards would result during the long-term operation of the project. Hazardous materials and waste would be managed and used in accordance with all applicable Federal, State, and local laws and regulations; the project would not be a significant hazard to the public or environment. Additionally, appropriate handling techniques shall be implemented for any unknown subsurface discoveries, to meet local, state, and federal regulations. Impacts would be less than significant.

| b) | Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | | |
|----|---|--|--|
| | | | |

Refer to VIII.a. Impacts would be less than significant.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The project site is not within one-quarter-mile of any existing or proposed school. No impacts would result.

| d) | Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would it create a significant hazard to | | |
|----|--|--|--|
| | the public or the environment? | | |

A search of potential hazardous materials sites compiled pursuant to Government Code Section 65962.5 was completed for the project site. Several databases and resources were consulted including the Department of Toxic Substances Control (DTSC) EnviroStor database, the California State Water Resources Control Board GeoTracker database, and other sources of potential hazardous materials sites available on the California EPA website. The Geotracker record search identified three sites within 1,000 feet of the project site. Of the three sites, two were listed as inactive, but required evaluation, and the third site was closed. No other hazardous materials sites were identified on-site. Thus, no hazard to the public or environment would result from project implementation.

| e) | For a project located within an airport land use plan or, where such a plan has not been adopted, within two mile of a public airport or public use airport, | | |
|----|---|--|--|
| | would the project result in a safety | | |

| Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---------------------------------------|--------------------------------------|---|------------------------------------|-----------|
| bazard for poople residing or working | | | | |

hazard for people residing or working in the project area?

The project is consistent with the General Plan, community plan, and zoning designations. The project is within the San Diego International Airport's Airport Influence Area, Review Area 2 as depicted in the 2014 Airport Land Use Compatibility Plan (ALUCP). Furthermore, the site is not located in a Safety Zone. Therefore, the use, and density are considered consistent with the ALUCP and would not result in a safety hazard for people residing or working in the area. Impacts would be less then significant.

| f) | For a project within the vicinity of a | | |
|----|--|--|-------------|
| | private airstrip, would the project result in a safety hazard for people residing | | \boxtimes |
| | or working in the project area? | | |

The project is not within the vicinity of private airstrip. No impact would be result.

| g) | Impair implementation of or physically interfere with an adopted emergency response plan or emergency | | |
|----|---|--|--|
| | evacuation plan? | | |

The project proposes development within an urbanized portion of the community on a site that is currently developed. No change to the existing circulation network would occur. The project would not impair or physically interfere with the implementation of an adopted emergency response plan or emergency evacuation plan. The project would not significantly interfere with circulation or access. Impacts would be less than significant.

| h) | Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? | | |
|----|--|--|--|
| | are intermixed with wildiands? | | |

The project site is located within an urbanized developed area and does not interface with any wildland spaces. No impact would result.

IX. HYDROLOGY AND WATER QUALITY - Would the project:

| a) | Violate any water quality standards or | | \square | |
|----|--|--|-----------|--|
| | waste discharge requirements? | | | |

Potential impacts to existing water quality standards associated with the project would include minimal short-term construction-related erosion/sedimentation and no long term operational storm water discharge. The project would be required to comply with the City's Storm Water Regulations for pre- and post-construction. Storm water requirements would be implemented during construction and post-construction, which have been reviewed by qualified staff and would be reverified during the ministerial process. Adherence with the standards would ensure that water quality standards are not violated and also preclude a cumulatively considerable contribution to water quality; therefore, a less than significant impact would result.

| Issue | | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|--------------------------------------|---|------------------------------------|-----------|
| supplies or in groundwate would be a r or a lowering table level (e pre-existing a level which existing land | e deplete groundwater nterfere substantially with r recharge such that there net deficit in aquifer volume g of the local groundwater .g., the production rate of nearby wells would drop to would not support uses or planned uses for ts have been granted)? | | | | |

The project does not require the construction of wells or the use of groundwater. Furthermore, the project would not introduce significant new impervious surfaces that could interfere with groundwater recharge, as the site is already developed with impervious surfaces. Therefore, the project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge. The project is located in an urban neighborhood where all infrastructures exist. The project would connect to the existing public water system. No impact would result.

| c) | Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or | | |
|----|---|--|--|
| | siltation on- or off-site? | | |

There are no streams or rivers within or adjacent to the project site. The project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site. Impacts would be less than significant.

| d) | Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface rupoff in a manner, which would result | | \boxtimes | |
|----|---|--|-------------|--|
| | runoff in a manner, which would result | | | |
| | in flooding on- or off-site? | | | |

As indicated in Section IX(c), the project would not alter the existing drainage pattern of the site or significantly alter runoff volumes. The project would not substantially alter the impervious area and runoff would continue to be discharged into the storm drain system. Thus, the project would not significantly alter the overall drainage pattern for the site or area, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. Impacts would be less than significant.



| Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|-------|--------------------------------------|---|------------------------------------|-----------|
| | | | | |

Refer to IX.a. through IX.d., above. The project would not exceed the capacity of the existing or planned storm water drainage system. All runoff from impervious surfaces would be treated by two lined biofiltration basins. To comply with current storm water regulations, on-site low impact design (LID) and integrated management practices (IMP) would be implemented to control peak runoff from the development. Project review by qualified City staff determined that the project would not exceed the capacity of the existing storm sewer system. Adherence with the standards would preclude a cumulatively considerable contribution to water quality. Impacts would be less than significant.

| f) | Otherwise substantially degrade water | | |
|----|---------------------------------------|--|--|
| | quality? | | |

Refer to IX.a., above. The project is required to implement structural BMPs for storm water pollutant control (BMP Design Manual Chapter 5, Part 1 of Storm Water Standards). The project would implement LID and source control and treatment control BMPs as required by the City's Storm Water Standards. These requirements have been reviewed by qualified staff and would be reverified during the ministerial process. Adherence to the standards would preclude a cumulatively considerable contribution to water quality. Impacts would be less than significant.

| g) | Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? | | | | |
|----|---|---------------|----------------------|-----------------|----------|
| | ect does not propose any housing | . Furthermore | , the project site i | s not located v | vithin a |

The floodplain. No impact would result.

| h) Place within a 100-year flood hazard area, structures that would impede or redirect flood flows? | | |
|---|--|-------------|
| Refer to IX.a., above. No impact would result. | | |
| X. LAND USE AND PLANNING – Would the project: | | |
| a) Physically divide an established community? | | \boxtimes |

The project would not substantially change the nature of the surrounding area and would not introduce any barriers or project features that could physically divide the community. Thus, the project would result in no impact related to physically dividing an established community

| b) | Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal | | \boxtimes |
|----|--|--|-------------|
| | program, or zoning ordinance) adopted | | |

| Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------------|---|------------------------------------|-----------|
| for the purpose of avoiding or mitigating an environmental effect? | | | | |

The project would be consistent with the General Plan, community plan, and zoning designations. The project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, community plan, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. No impact would result.

| c) | Conflict with any applicable habitat | | |
|----|--------------------------------------|--|-------------|
| | conservation plan or natural | | \boxtimes |
| | community conservation plan? | | |

Refer to IV.a. The City is a participant in the Multiple Species Conservation Program (MSCP), a comprehensive, long-term habitat conservation program designed to provide permit issuance authority for take of covered species to the local regulatory agencies. The MSCP is implemented in the City through the Subarea Plan. Although the project is within a Development Area identified in the Subarea Plan, it has not been identified as a strategic preserve, nor is it located within or adjacent to the Multi-Habitat Planning Area (MHPA); more specifically, the project site is identified as a developed community within the Urban Area. There are no other policies or ordinances that apply to the project. Furthermore, the project would not conflict with the provisions of any other adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. No impacts would occur.

XI. MINERAL RESOURCES – Would the project:



There are no known mineral resources located on the project site. The project site is not currently being utilized for mineral extraction and does not contain any known mineral resources that would be of value to the region. The urbanized and developed nature of the site and vicinity would preclude the extraction of any such resources. No impact would result.



Refer to XI.a., above. The project area has not been delineated on a local General Plan, specific plan, or other land use plan as a locally important mineral resource recovery site, and no such resources would be affected with project implementation. No impact would result.

| Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------------|---|------------------------------------|-----------|
| XII. NOISE – Would the project result in: | | | | |
| Generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | | | \boxtimes | |

Construction Noise

Construction of the project would generate a temporary increase in noise in the project area. Shortterm noise impacts would be associated with on-site demolition, excavation, grading, and construction activities of the project. Construction-related short-term noise levels would be higher than existing ambient noise levels in the project area but would no longer occur once construction is completed.

Construction activity would occur during allowable times, in compliance with Section 59.5.0404 of the San Diego Municipal Code. The San Diego Municipal Code states that construction noise in residential zones should not reach an average sound level greater than 75 dBA Leq during the 12-hour period from 7:00 a.m. to 7:00 p.m. Construction of the project would comply with the City's 75 dBA Leq (12 hour) noise limit. Construction noise impacts would be less than significant.

Operational Noise

Typical noise levels associated with a storage facility are anticipated. Existing traffic volumes = are not at a level that would result in a significant noise impact. Additional traffic from the project would not sufficiently raise the volume of traffic to create a significant noise impact. Operational noise impacts would be less than significant.

| b) | Generation of, excessive ground borne | | \square | |
|----|---|--|-----------|--|
| | vibration or ground borne noise levels? | | | |

The project would implement conventional construction techniques and equipment. Standard equipment such as scrapers, graders, backhoes, loaders, tractors, cranes, and miscellaneous trucks would be used for construction of most project facilities. As described in response XII(a) above, potential effects from construction noise would be addressed through compliance with City restrictions. Excessive ground borne vibration or ground borne noise is not anticipated with construction of the project, because the project would utilize mat foundation that does not require pile driving and the use of pylons. Impacts would be less than significant.

| C) | A substantial permanent increase in | | | |
|----|--|--|-----------|--|
| | ambient noise levels in the project | | \square | |
| | vicinity above levels existing without | | | |
| | the project? | | | |

Substantial increases in ambient noise levels would not result because the proposed uses on-site are consistent with uses present in the surrounding area. Any ambient noise emanating from the project would be typical of that associated with an urban neighborhood. Therefore, no substantial increase in ambient noise levels is anticipated. Impacts would be less than significant.

| d) | A substantial temporary or periodic | | |
|----|---|--|--|
| | increase in ambient noise levels in the | | |

| | ls | sue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact | | |
|----|---|--|--------------------------------------|---|------------------------------------|-----------|--|--|
| | | project vicinity above existing without the project? | | | | | | |
| R | lefer to | o XII.a. | | | | | | |
| | e) | For a project located within an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport would the project expose people residing or working in the area to excessive noise levels? | | | | | | |
| Ir | Although the project site is located in Airport Influence Area – Review Area 2 for the San Diego International Airport, it is located outside the airport noise contours. As such, the project would not expose people to working in the area to excessive aircraft noise levels. No impact would result. | | | | | | | |
| | f) | For a project within the vicinity of a | | | | | | |

| f) | For a project within the vicinity of a | | |
|----|--|--|-------------|
| | private airstrip, would the project | | |
| | expose people residing or working in | | \boxtimes |
| | the project area to excessive noise | | |
| | levels? | | |

The project site is not located within vicinity of a private airstrip. No impact would result.

XIII. POPULATION AND HOUSING – Would the project:

| a) | Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other | | |
|----|---|--|--|
| | infrastructure)? | | |

The project would not involve the extension of roads or services, as the project is an infill project located within an existing urban community. Therefore, the project would not induce substantial population growth in the area. No impact would result.

| b) | Displace substantial numbers of existing housing, necessitating the construction of replacement housing | | \boxtimes |
|----|---|--|-------------|
| | elsewhere? | | |

There is no existing housing within the project site. No housing would be displaced by the project. No impact would result.

| c) | Displace substantial numbers of | | |
|----|--|--|-------------|
| | people, necessitating the construction | | \boxtimes |
| | of replacement housing elsewhere? | | |

There is no existing housing within the project site. No population would be displaced by the project. No impact would result.

| Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact | | | |
|--|--|---|---|-------------|--|--|--|
| XIV. PUBLIC SERVICES | | | | | | | |
| a) Would the project result in substantial ad physically altered governmental facilities, construction of which could cause signific rations, response times or other perform. | need for new or p ant environmenta | hysically altered gover Il impacts, in order to m | nmental facilities naintain acceptat | , the | | | |
| i) Fire protection | | | \boxtimes | | | | |
| The project site is located in an urbanized area where fire protection services are provided. The project would not adversely affect existing levels of fire protection services to the area and would not require the construction of new or expanded governmental facilities. Impacts to fire protection would be less than significant. | | | | | | | |
| ii) Police protection | | | \boxtimes | | | | |
| The project site is located in an urbanized project would not adversely affect existing not require the construction of new or exp protection would be less than significant. | levels of polic | e protection servic | es to the area | and would | | | |
| iii) Schools | | | | \boxtimes | | | |
| The project does not propose housing, not project would not induce growth that could would result. | | - | | | | | |
| iv) Parks | | | \boxtimes | | | | |
| The project site is located in an urbanized and developed area where City-operated parks are available. Furthermore, the project does not propose housing, therefore not necessitating a requirement for additional parks. The project would not significantly increase the demand on existing neighborhood or regional parks or other recreational facilities over that which presently exists; the project is not anticipated to result in a significant increase in demand for parks or other offsite recreational facilities. As such, impacts related to parks would be less than significant. | | | | | | | |
| v) Other public facilities | | | | \boxtimes | | | |
| would not adversely affect existing levels of | The project site is located in an urbanized area where City services are already provided. The project would not adversely affect existing levels of facilities to the area and would not require the construction of new or expanded governmental facilities. No impacts to other public facilities would | | | | | | |

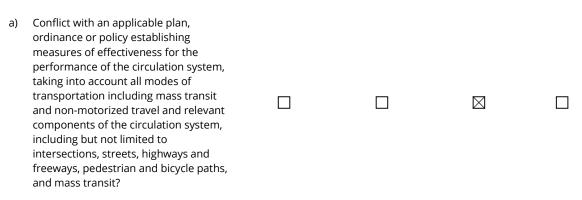
| ls | sue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---------|--|--------------------------------------|---|------------------------------------|-----------|
| XV. REC | REATION | | | | |
| a) | Would the project 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? | | | \boxtimes | |

The project would not adversely affect existing levels of neighborhood and regional parks and would not require the construction or expansion of those facilities. The project would not significantly increase the use of existing neighborhood or regional parks or other recreational facilities as the project would consistent with applicable land use plans and underlying zone designations. Therefore, the project is not anticipated to result in the use of available parks or facilities such that substantial deterioration occurs, or that would require the construction or expansion of recreational facilities to satisfy demand. As such, a less than significant impact related to recreational facilities would result.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities,
 which might have an adverse physical effect on the environment?

The project would not adversely affect existing levels of recreational facilities and would not require the construction or expansion of those existing facilities. The project would not significantly increase the use of existing neighborhood or regional parks or other recreational facilities, as the project would be consistent with applicable land use plans and underlying zone designations. Therefore, the project is not anticipated to result in the use of available recreational facilities such that substantial deterioration occurs, or that would require the construction or expansion of recreational facilities to satisfy demand. As such, a less than significant impact would result.

XVI. TRANSPORTATION/TRAFFIC - Would the project?



The project would result in approximately 384 average daily trips (ADT) with 24 AM and 37 PM peak hour trips; however, the traffic generated would not require the preparation of a traffic impact analysis as it is below the 1,000 ADT threshold identified in the City's Traffic Impact Manual. Based on the estimated ADT for the project, the project would not be expected to substantially adversely affect the performance of surrounding street segments and intersections. The project would not

| Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|-------|--------------------------------------|---|------------------------------------|-----------|
|-------|--------------------------------------|---|------------------------------------|-----------|

conflict with existing circulation system, including mass transit, and pedestrian and bicycle paths in the vicinity.

The project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, including alternative modes of transportation. The project would not result in impacts to intersections or street segments. Impacts would be less than significant.

| b) | Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways? | | | |
|----------|---|--|-------------|--|
| Refer to | o Response XVI(a). | | | |
| c) | Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that | | \boxtimes | |

The project is consistent with the General Plan, community plan, and zoning designations. As stated in Section VIII(e), the project is within the San Diego International Airport's Airport Influence Area, Review Area 2 as depicted in the 2014 Airport Land Use Compatibility Plan (ALUCP). Furthermore, the site is not located in a Safety Zone. Therefore, the use, and density are considered consistent with the ALUCP. Lastly, the project would not require to Federal Aviation Administration Part 77 notification to either the San Diego International Airport North Island Naval Air Station as the structure proposed would not encroach the surface area. Implementation of the project would not result in a change in air traffic patterns, as the project would not be constructed at a height that would impair air travel. Impacts would be less then significant.

results in substantial safety risks?



The project does not include any roadway improvements. Access points to site has designed consistent with the City's engineering standards, and would not create a hazard for vehicles, bicycles, or pedestrians entering or exiting the site. The building envelope has been designed to accommodate appropriate visibility triangles at project driveway and intersections and would not create a hazardous condition at these points. The project would not include any project elements that could create a hazard to the public. No impact would result.

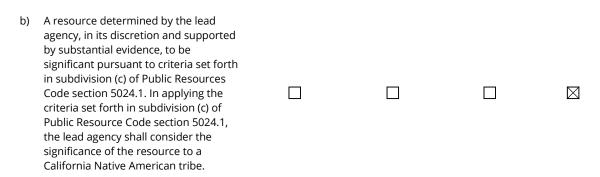
| Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------------|---|------------------------------------|-------------|
| Result in inadequate emergency access? | | | | \boxtimes |

As stated XVI.d., the project has been designed consistent with the City's engineering standards. Additionally, the project has been reviewed by the Fire-Rescue Department to ensure proper circulation on and off the site for emergency services vehicles. No impacts would result.

The project would not disrupt existing or planned bicycle or pedestrian facilities surrounding the project site, and no known unsafe bicycle or pedestrian conditions exist in the study area. The project would make no changes to existing bike lanes or access to transit and would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. Therefore, impacts to the pedestrian, bicycle, or transit network within and surrounding the project site would be less than significant.

XVII. TRIBAL CULTURAL RESOURCES – Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

The project would not cause a substantial adverse effect to tribal cultural resources, as there are no recorded sites listed or sites eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined by the Public Resources Code. No impact would result.



Tribal Cultural Resources include sites, features, places, cultural landscapes, and sacred places or objects that have cultural value or significance to a Native American Tribe. Tribal Cultural Resources include "non-unique archaeological resources" that, instead of being important for "scientific" value as a resource, can also be significant because of the sacred and/or cultural tribal value of the

resource. Tribal representatives are considered experts appropriate for providing substantial evidence regarding the locations, types, and significance of tribal cultural resources within their traditionally and cultural affiliated geographic area (PRC § 21080.3.1(a)).

The City of San Diego, as Lead Agency, determined that Tribal Cultural Resources pursuant to subdivision Public Resources Code Section 5024.1(c) would not be potentially impacted through project implementation, as the project site has been developed and is located within an urban area. However, in accordance with the requirements of Public Resources Code 21080.3.1, the City of San Diego provided formal notification to the lipay Nation of Santa Isabel and the Jamul Indian Village, both traditionally and culturally affiliated with the project area, requesting consultation via email on March 14, 2018. Both Native American Tribes responded within the 30-day formal notification period and consultation took place on March 16, 2018.

During the consultation additional Tribal Cultural Resources were not identified. Furthermore, both Tribes concurred with the staff's determination that the site does not have the potential to impact tribal cultural resources. Consequently, supplementary mitigation measures were not necessitated; thus, concluding the consultation process. No impact would result.

XVIII. UTILITIES AND SERVICE SYSTEMS - Would the project:



Wastewater facilities used by the project would be operated in accordance with the applicable wastewater treatment requirements of the RWQCB. Treatment of effluent from the site is anticipated to be routine and is not expected to exceed the wastewater treatment requirements of the RWQCB. Existing sewer infrastructure exists within roadways surrounding the project site, as described below, and has adequate capacity to serve the project. Thus, impacts related to wastewater treatment requirements would be less than significant.

| b) | Require or result in the construction of new water or wastewater treatment | | | |
|----|---|--|-------------|--|
| | facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | | \boxtimes | |

Refer to XVII.a., above. Water service is also provided by the Public Utilities Department. The Alvarado Water Treatment Plant provides drinking water to customers in the central section of the City. The Alvarado Plant has a capacity of 120 million gallons of treated drinking water per day.

Construction of the project would not significantly increase the demand for water or wastewater treatment services, and as such, would not trigger the need for new water or wastewater treatment facilities or the expansion of those facilities. Adequate services are available to serve the project. Impacts would be less than significant.

| C) | Require or result in the construction of | | | |
|----|--|--|-------------|--|
| | new storm water drainage facilities or | | \boxtimes | |
| | expansion of existing facilities, the | | | |

| Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------------|---|------------------------------------|-----------|
| construction of which could cause significant environmental effects? | | | | |

Refer to IX.e., above. The project would not exceed the capacity of the City's existing storm water drainage system and would not require the expansion of the system. Impacts would be less than significant.

| d) | Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? | | | \boxtimes | |
|----|--|--|--|-------------|--|
|----|--|--|--|-------------|--|

The project does not meet the CEQA significance thresholds requiring the need for the project to prepare a water supply assessment. The existing project site currently receives water service from the City, and adequate services are available to serve the structures without requiring new or expanded entitlements. Impacts would be less than significant.

| e) | Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | | | \boxtimes | |
|----|--|--|--|-------------|--|
|----|--|--|--|-------------|--|

The City has determined that is has adequate wastewater treatment capacity to serve the project. Refer to XVIII.a., above. The existing facilities available to serve the project site were determined to be acceptable; in addition, the treatment facility has remaining capacity. Therefore, no new facilities would be needed to serve the project. Subsequently, the project would not adversely affect existing wastewater treatment services and adequate services are available to serve the project without requiring new or expanded entitlements. The project would result in less than significant impacts with respect to wastewater treatment capacity.

| f) | Be served by a landfill with sufficient | | | |
|----|---|--|-------------|--|
| | permitted capacity to accommodate the project's solid waste disposal | | \boxtimes | |
| | needs? | | | |

The City's Miramar Landfill is currently planned and permitted to provide capacity to approximately the year 2031. Currently, yearly tonnage is estimated by the City to be approximately 910,000 tons of trash per year. In addition, the project would be required to comply with the City's Recycling Ordinance (Municipal Code Chapter 6, Article 6, Division 7), which requires on-site recyclable collection for residential and commercial uses; the City's Refuse and Recyclable Materials Storage Regulations (Municipal Code Chapter 14, Article 2 Division 8), that requires minimum exterior refuse and recyclable material storage areas required at residential and commercial properties; as well as the Construction and Demolition (C&D) Debris Deposit Ordinance (Municipal Code Chapter 6, Article 6, Division 6), which requires that the majority of construction, demolition, and remodeling projects requiring building, combination, or demolition permits pay a refundable C&D Debris Recycling

| Issue | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|-------|--------------------------------------|---|------------------------------------|-----------|
|-------|--------------------------------------|---|------------------------------------|-----------|

Deposit and divert at least 50 percent of their waste by recycling, reusing, or donating reusable materials.

Waste would be generated from the demolition, construction, and operation of the project that would require proper disposal of at a licensed landfill or construction and demolition debris recycling facility. Projects that include the construction, demolition, or renovation of 1,000,000 square feet or more of building space may generate approximately 1,500 tons of waste or more and are considered to have direct impacts on solid waste management. The project is proposing approximately 155,052 total gross square feet and would not exceed the City's threshold; therefore, the project would not result in a direct impact.

However, the project exceeds the City's significance threshold for cumulatively considered solid waste impacts of 40,000 square feet or more of building space. Therefore, a waste management plan has been prepared and approved by the City's Environmental Services Department. Implementation of the approved waste management plan would be made a condition of approval. and would implement a project-specific waste management plan.

The project would comply with all Federal, State, and local statutes and regulations related to solid waste. The project would not result in the generation of large amounts of solid waste, nor generate or require the transport of hazardous waste materials other than minimal amounts generated during the construction phase. All demolition activities would comply with any City of San Diego requirements for diversion of both construction waste during the demolition phase and solid waste during the long-term, operational phase. With implementation of the project-specific waste management plan and compliance with local and state regulations, impacts related to solid waste would be less than significant

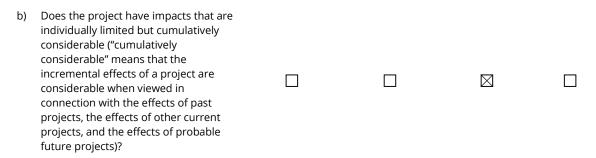
| g) | Comply with federal, state, and local | | | |
|----|--|--|-------------|--|
| | statutes and regulation related to solid | | \boxtimes | |
| | waste? | | | |

Refer to XVII.f.. Overall, the project would comply with federal, state and local statutes and regulations related to solid waste. Impacts would be less than significant.

XIX. MANDATORY FINDINGS OF SIGNIFICANCE -

 a) Does the project have the potential to 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 selfsustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

The project proposes redevelopment of a developed infill site. The project site does not contain biological resources, and development of the project would not have the potential to 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, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. The project would have the potential to result in significant impacts to paleontological resources. Mitigation measures have been incorporated to reduce impacts to less than significant.



Cumulative environmental impacts are those impacts that by themselves are not significant, but when considered with impacts occurring from other projects in the vicinity would result in a cumulative impact. Related projects considered to have the potential of creating cumulative impacts in association with the project consist of projects that are reasonably foreseeable and that would be constructed or operated during the life of the project. The project would be located in a developed area that is largely built out. No other construction projects are anticipated in the immediate area of the project.

As documented in this Initial Study, the project may have the potential to degrade the environment as a result of impacts to paleontological resources, which may have cumulatively considerable impacts when viewed in connection with the effects of other potential projects in the area. As such, mitigation measures have been identified to fully mitigate and reduce impacts to a less than significant level. Other future projects within the surrounding area would be required to comply with applicable local, State, and Federal regulations to reduce potential impacts to less than significant, or to the extent possible. As such, the project is not anticipated to contribute to potentially significant cumulative environmental impacts. Project impacts would be less than significant.

| c) | Does the project have environmental | | |
|----|-------------------------------------|--|--|
| | effects that will cause substantial | | |
| | adverse effects on human beings, | | |
| | either directly or indirectly? | | |

As discussed throughout this document, it is not anticipated that the demolition, construction, and operation of the project would not cause environmental effects that would significantly directly or indirectly impact human beings. All impacts identified as being significant have been mitigated to below a level of significance. For this reason, all environmental effects fall below the thresholds established by the City of San Diego. Impacts would be less than significant.

INITIAL STUDY CHECKLIST REFERENCES

I. Aesthetics / Neighborhood Character

- City of San Diego General Plan
- Community Plan: Barrio Logan/101 Harbor Community Plan

II. Agricultural Resources & Forest Resources

- City of San Diego General Plan
- U.S. Department of Agriculture, Soil Survey San Diego Area, California, Part I and II, 1973
- California Agricultural Land Evaluation and Site Assessment Model (1997)
- Site Specific Report:

III. Air Quality

- California Clean Air Act Guidelines (Indirect Source Control Programs) 1990
- Regional Air Quality Strategies (RAQS) APCD
- Site Specific Report:

IV. Biology

- City of San Diego, Multiple Species Conservation Program (MSCP), Subarea Plan, 1997
- City of San Diego, MSCP, "Vegetation Communities with Sensitive Species and Vernal Pools" Maps, 1996
- City of San Diego, MSCP, "Multiple Habitat Planning Area" maps, 1997
- Community Plan Resource Element
- California Department of Fish and Game, California Natural Diversity Database, "State and Federally-listed Endangered, Threatened, and Rare Plants of California," January 2001
- California Department of Fish and Game, California Natural Diversity Database, "State and Federally-listed Endangered and Threatened Animals of California, "January 2001
- City of San Diego Land Development Code Biology Guidelines
- Site Specific Report:
- V. Cultural Resources (includes Archaeology and Built Environment)
- City of San Diego Historical Resources Guidelines
- City of San Diego Archaeology Library
- Historical Resources Board List
- Community Historical Survey:
- Site Specific Report:

VI. Geology/Soils

- City of San Diego Seismic Safety Study
- U.S. Department of Agriculture Soil Survey San Diego Area, California, Part I and II, December 1973 and Part III, 1975
- Site Specific Report:

Geotechnical and Fault Investigation, prepared by Geocon Incorporated, December

17, 2017.

VII. Greenhouse Gas Emissions

Site Specific Report:

Climate Action Plan Consistency Checklist, City of San Diego, Revised June 2017, Multi-Discipline Review Cycle 8.

VIII. Hazards and Hazardous Materials

- San Diego County Hazardous Materials Environmental Assessment Listing
- San Diego County Hazardous Materials Management Division
- FAA Determination
- State Assessment and Mitigation, Unauthorized Release Listing, Public Use Authorized
- Airport Land Use Compatibility Plan
- Site Specific Report:

IX. Hydrology/Drainage

- Flood Insurance Rate Map (FIRM)
- Federal Emergency Management Agency (FEMA), National Flood Insurance Program-Flood Boundary and Floodway Map
- Clean Water Act Section 303(b) list, http://www.swrcb.ca.gov/tmdl/303d_lists.html
- Site Specific Report:

Preliminary Drainage Study, prepared by Omega Engineering Consultants, October 12, 2017.

X. Land Use and Planning

- City of San Diego General Plan
- Community Plan: Barrio Logan/101 Harbor Community Plan
- Airport Land Use Compatibility Plan
- City of San Diego Zoning Maps
- FAA Determination:
- Other Plans:

XI. Mineral Resources

- California Department of Conservation Division of Mines and Geology, Mineral Land Classification
- Division of Mines and Geology, Special Report 153 Significant Resources Maps
- City of San Diego General Plan:
- Site Specific Report:

XII. Noise

- City of San Diego General Plan
- Community Plan
- San Diego International Airport Lindbergh Field CNEL Maps
- Brown Field Airport Master Plan CNEL Maps
- Montgomery Field CNEL Maps
- San Diego Association of Governments San Diego Regional Average Weekday Traffic Volumes
- San Diego Metropolitan Area Average Weekday Traffic Volume Maps, SANDAG

Site Specific Report:

XIII. Paleontological Resources

- City of San Diego Paleontological Guidelines
- Deméré, Thomas A., and Stephen L. Walsh, "Paleontological Resources City of San Diego,"
 Department of Paleontology San Diego Natural History Museum, 1996
- Kennedy, Michael P., and Gary L. Peterson, "Geology of the San Diego Metropolitan Area, California. Del Mar, La Jolla, Point Loma, La Mesa, Poway, and SW 1/4 Escondido 7 1/2 Minute Quadrangles," *California Division of Mines and Geology Bulletin* 200, Sacramento, 1975
- Kennedy, Michael P., and Siang S. Tan, "Geology of National City, Imperial Beach and Otay Mesa Quadrangles, Southern San Diego Metropolitan Area, California," Map Sheet 29, 1977
 Site Specific Report:

XIV. Population / Housing

- City of San Diego General Plan
- Community Plan
- Series 11/Series 12 Population Forecasts, SANDAG
- Other:

XV. Public Services

- City of San Diego General Plan
- Community Plan

XVI. Recreational Resources

- City of San Diego General Plan
- Community Plan
- Department of Park and Recreation
- City of San Diego San Diego Regional Bicycling Map
- Additional Resources:

XVII. Transportation / Circulation

- City of San Diego General Plan
- Community Plan:
- San Diego Metropolitan Area Average Weekday Traffic Volume Maps, SANDAG
- San Diego Region Weekday Traffic Volumes, SANDAG
- Site Specific Report:

XVIII. Utilities

Site Specific Report:

Waste Management Plan, prepared by DDCA Architects, February 2018.

XIX. Water Conservation

Sunset Magazine, New Western Garden Book, Rev. ed. Menlo Park, CA: Sunset Magazine

XX. Water Quality

- Clean Water Act Section 303(b) list, http://www.swrcb.ca.gov/tmdl/303d_lists.html
- Site Specific Report:

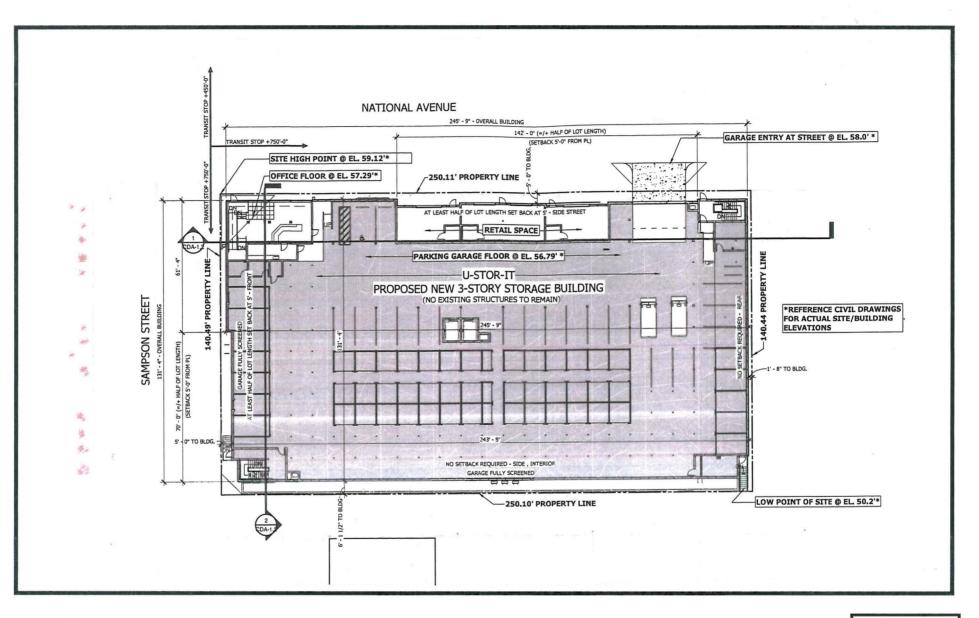
Priority Development Project - Storm Water Quality Management Plan, U-Stor-It, prepared by Omega Engineering Consultants, November 7, 2017.

Revised: February 2018



City of San Diego – Development Services Department

No. 1





Site Plan

<u>U-Stor-It CDP / Project No. 586276</u> City of San Diego – Development Services Department FIGURE No. **2**