



THE CITY OF SAN DIEGO

TIERED MITIGATED NEGATIVE DECLARATION

Project No. 697502
SCH No. 2019060003

SUBJECT: Torrey Pines U-STOR-IT: A Coastal Development Permit and Neighborhood Development Permit to demolish an existing building, and construct a 3 story, 166,313 square foot self-storage building on a 1.46-acre site located at 11391 Sorrento Valley Road. The project is zoned IL-3-1 and designated as Industrial in the Torrey Pines Community Plan area. A drainage easement along the west property line and southeastern property line will be vacated. Overlay zones include: MCAS Miramar Airport Influence Area (Review Area 1), MCAS Miramar Airport Safety Zones (APZ II and Transition Zone), Coastal (N-APP-1), Coastal Height Limitation, Very High Fire Hazard Severity, Prime Industrial Lands, and Transit Priority Area (TPA). The site is not included on any Government Code listing of hazardous waste sites. (LEGAL DESCRIPTION: LOTS 12 OF VIA SORRENTO VALLEY INDUSTRIAL PARK UNIT NO. 3, IN THE CITY OF SAN DIEGO, COUNTY OF SAN DIEGO, STATE OF CALIFORNIA, ACCORDING TO MAP THEREOF NO. 5693, FILED IN THE OFFICE OF THE COUNTY RECORDER OF SAN DIEGO COUNTY, FEBRUARY 9, 1966.) APPLICANT: Peter Nora, U-STOR-IT.

I. PROJECT DESCRIPTION:

See attached Tiered Initial Study.

II. ENVIRONMENTAL SETTING:

See attached Tiered Initial Study.

III. DOCUMENTATION:

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

IV. 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 MMRP requirements are incorporated into the design.

2. In addition, the ED shall verify that the MMRP Conditions/Notes that apply ONLY to the construction phases of this project are included VERBATIM, under the heading, "**ENVIRONMENTAL/MITIGATION REQUIREMENTS.**"
3. These notes must be shown within the first three (3) sheets of the construction documents in the format specified for engineering construction document templates as shown on the City website:
<https://www.sandiego.gov/development-services/forms-publications/design-guidelines-templates>
4. The **TITLE INDEX SHEET** must also show on which pages the "Environmental/Mitigation Requirements" notes are provided.
5. **SURETY AND COST RECOVERY** – The Development Services Director or City Manager may require appropriate surety instruments or bonds from private Permit Holders to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

B. GENERAL REQUIREMENTS – PART II

Post Plan Check (After permit issuance/Prior to start of construction)

1. **PRECONSTRUCTION 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 Archaeologist
Qualified Native American 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:

- 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**

2. MMRP COMPLIANCE: This Project, Project Tracking System (PTS) #697502, 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 Development Services Director or City Manager, additional surety instruments or bonds from the private Permit Holder may be required to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

5. OTHER SUBMITTALS AND INSPECTIONS:

The Permit Holder/Owner’s representative shall submit all required documentation, verification letters, and requests for all associated inspections to the RE and MMC for approval per the following schedule:

Document Submittal/Inspection Checklist		
Issue Area	Document Submittal	Associated Inspection/Approvals/Notes
General	Consultant Qualification Letters	Prior to Preconstruction Meeting
General	Consultant Construction Monitoring Exhibits	Prior to Preconstruction Meeting
Cultural Resources (Archaeology)	Monitoring Report(s)	Archaeology/Historic Site Observation
Tribal Cultural Resources	Monitoring Report(s)	Archaeology/Historic Site Observation
Bond Release	Request for Bond Release Letter	Final MMRP Inspections Prior to Bond Release Letter

C SPECIFIC MMRP ISSUE AREA REQUIREMENTS

HISTORIC RESOURCES (ARCHAEOLOGY)

I. Prior to Permit Issuance

A. Entitlements Plan Check

1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for Archaeological Monitoring and Native American monitoring have been noted on the applicable construction documents through the plan check process.

B. Letters of Qualification have been submitted to ADD

1. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.
2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological

monitoring of the project meet the qualifications established in the HRG.

3. Prior to the start of work, the applicant must obtain written 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 (1 quarter-mile radius) has been completed. Verification includes, but is not limited to a copy of a confirmation letter from South Coastal Information Center, 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.
3. The PI may submit a detailed letter to MMC requesting a reduction to the ¼ mile radius.

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, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified Archaeologist and Native American Monitor shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager 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

- a. Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits.
 - b. The AME 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 site conditions such as depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

- A. Monitor(s) Shall be Present During Grading/Excavation/Trenching
 - 1. The Archaeological Monitor shall be present fulltime during all soil disturbing and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. The Construction Manager 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 AME.
 - 2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and MMC. If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall

stop and the Discovery Notification Process detailed in Section III.B-C and IV.A-D shall commence.

3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered that may reduce or increase the potential for resources to be present.
4. The archaeological and Native American consultant/monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR's 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 Archaeological Monitor shall direct the contractor to temporarily divert all soil disturbing activities, including but not limited to digging, trenching, excavating or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources 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.
4. No soil shall be exported off-site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered.

C. Determination of Significance

1. The PI and Native American consultant/monitor, where Native American resources are discovered shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below.
 - 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.

- b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) which has been reviewed by the Native American consultant/monitor 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. Note: If a unique archaeological site is also an historical resource as defined in Guidelines Section, then the limits on the amount(s) that a project applicant may be required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply.
- c. If the resource is not significant, the PI shall submit a letter to MMC indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.

IV. Discovery of Human Remains

If human remains are discovered, work shall halt in that area and no soil shall be exported off-site until a determination can be made regarding the provenance of the human remains; and the following procedures as set forth in CEQA Section 15064.5(e), the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken:

A. Notification

- 1. Archaeological Monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the Monitor is not qualified as a PI. MMC will notify the appropriate Senior Planner in the Environmental Analysis Section (EAS) of the Development Services Department to assist with the discovery notification process.
- 2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.

B. Isolate discovery site

- 1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenance of the remains.
- 2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenance.

3. If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are most likely to be of Native American origin.

C. If Human Remains ARE determined to be Native American

1. The Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, ONLY the Medical Examiner can make this call.
2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.
3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with CEQA Guidelines Section 15064.5(e), the California Public Resources and Health & Safety Codes.
4. The MLD will have 48 hours to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the human remains and associated grave goods.
5. Disposition of Native American Human Remains will be determined between the MLD and the PI, and, if:
 - a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being granted access to the site, OR;
 - b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, the landowner shall reinter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance, THEN
 - c. To protect these sites, the landowner shall do one or more of the following:
 - (1) Record the site with the NAHC;

- (2) Record an open space or conservation easement; or
- (3) Record a document with the County. The document shall be titled "Notice of Reinterment of Native American Remains" and shall include a legal description of the property, the name of the property owner, and the owner's acknowledged signature, in addition to any other information required by PRC 5097.98. The document shall be indexed as a notice under the name of the owner.

V. Night and/or Weekend Work

A. If night and/or weekend work is included in the contract

1. 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 CSV and submit to MMC via fax by 8AM of the next business day.

b. Discoveries

All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction, and IV - Discovery of Human Remains. Discovery of human remains shall always be treated as a significant discovery.

c. Potentially Significant Discoveries

If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction and IV-Discovery of Human Remains shall be followed.

d. The PI shall immediately contact MMC, or by 8AM of 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 and/or weekend work becomes necessary during the course of construction
 - 1. The Construction Manager 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.

VI. Post Construction

- A. Preparation and Submittal of Draft Monitoring Report
 - 1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring. It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe resulting from delays with analysis, special study results or other complex issues, a schedule shall be submitted to MMC establishing agreed due dates and the provision for submittal of monthly status reports until this measure can be met.
 - a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report.
 - b. Recording Sites with State of California Department of Parks and Recreation

The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms- DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center 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 Artifacts
1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued
 2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.
 3. The cost for curation is the responsibility of the property owner.
- C. Curation of artifacts: Accession Agreement and Acceptance Verification
1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American representative, as applicable.
 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.
 3. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance occurs in accordance with Section IV – Discovery of Human Remains, Subsection 5.
- D. Final Monitoring Report(s)

1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy 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 and/or release of the Performance Bond for grading until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

TRIBAL CULTURAL RESOURCES

TCR-1

Impacts to Tribal Cultural Resources would be reduced to below a level of significance with implementation of mitigation measures outlined under Historical Resources (Archaeology).

V. PUBLIC REVIEW DISTRIBUTION:

Copies or notice of this Tiered Mitigated Negative Declaration were distributed to:

STATE

State Clearinghouse (46A)
Caltrans District 11, Kimberly Dodson

CITY OF SAN DIEGO

Mayor's Office
Council member Joe LaCava, Council District 1
Development Services:
 Development Project Manager
 Engineering Review
 Planning Review
 Transportation

MMC (77A)
City Attorney's Office (93C)
Carmel Valley Library
Central Library

OTHER ORGANIZATIONS AND INTERESTED PARTIES

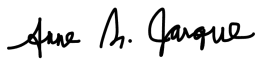
Historical Resources Board (87)
Carmen Lucas (206)
South Coastal Information Center (210)
San Diego Archaeological Center (212)
Save Our Heritage Organization (214)
Ron Christman (215)
Clint Linton (215B)
Frank Brown - Inter-Tribal Cultural Resources Council (216)

Campo Band of Mission Indians (217)
San Diego County Archaeological Society, Inc. (218)
Kumeyaay Cultural Heritage Preservation (223)
Kumeyaay Cultural Repatriation Committee (225)
Torrey Pines Community Planning Board (469)
Torrey Pines Association
UCSD Physical & Community Planning
Crest Canyon Citizens Advisory Committee
Friends Of Los Penasquitos Canyon Preserve
Richard Drury
Molly Greene
John Stump
Kevin Johnson
William Jones

VI. RESULTS OF PUBLIC REVIEW:

- 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 tiered environmental document and associated project-specific technical appendices, if any, may be accessed on the City of San Diego's California Environmental Quality Act (CEQA) webpage at <https://www.sandiego.gov/ceqa>.



Anne B. Jarque
Senior Planner
Development Services Department

3/17/2023
Date of Draft Report

5/25/2023
Date of Final Report

Analyst: Sara Osborn

Attachments:

- Initial Study
- List of Acronyms
- Figure – Location
- Figure – Site Plan

**Mitigated Negative Declaration
Torrey Pines U-Stor-It
Letters of Comment and Responses**

Letters of comment to the Draft Mitigated Negative Declaration (IS/MND) were received from the following agencies, organizations, and individuals. The letters of comment and responses follow.

- A San Diego Archeological Society, Inc. RTC-2
- B California Department of Transportation RTC-3

LETTER

RESPONSE

Letter A



San Diego County Archaeological Society, Inc.

Environmental Review Committee

12 April 2023

To: Ms. Sara Osborn
Development Services Department
City of San Diego
1222 First Avenue, Mail Station 501
San Diego, California 92101

Subject: Draft Tiered Mitigated Negative Declaration
Torrey Pines U-STOR-II
Project No. 697502

Dear Ms. Osborn:

I have reviewed the subject DTMND on behalf of this committee of the San Diego County Archaeological Society.

A-1

Based on the information contained in the documents provided on the Department's website, including the cultural resources survey report, we agree with the recommendation for archaeological and Native American monitoring for the project. The mitigation program defined in the DTMND is the City's standard mitigation measures and they are appropriate for this project.

Thank you for the opportunity to participate in the public review of this project's environmental documents.

Sincerely,


James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: Brian F. Smith & Associates
SDCAS President
File

P.O. Box 81106 San Diego, CA 92138-1106 (858) 538-0935

A-1. Comment noted. Environmental Analysis Section (EAS) staff has provided this letter to the applicant.

LETTER

RESPONSE

Letter B

CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, GOVERNOR

California Department of Transportation



DISTRICT 11
4050 TAYLOR STREET, MS-240
SAN DIEGO, CA 92110
(619) 709-5152 | FAX (619) 688-4299 TTY 711
www.dot.ca.gov

April 24, 2023

11-SD-5, 805
PM 31.188
Torrey Pines U-Stor-It
MND/SCH#2019060003

Ms. Sara Osborn
Development Project Manager 3
City of San Diego
1222 First Ave., MS 501
San Diego, CA 92101

Dear Ms. Osborn:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Mitigated Negative Declaration for the Torrey Pines U-Stor-It located near Interstate 5 (I-5) and Interstate 805 (I-805). The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Safety is one of Caltrans' strategic goals. Caltrans strives to make the year 2050 the first year without a single death or serious injury on California's roads. We are striving for more equitable outcomes for the transportation network's diverse users. To achieve these ambitious goals, we will pursue meaningful collaboration with our partners. We encourage the implementation of new technologies, innovations, and best practices that will enhance the safety on the transportation network. These pursuits are both ambitious and urgent, and their accomplishment involves a focused departure from the status quo as we continue to institutionalize safety in all our work.

Caltrans is committed to prioritizing projects that are equitable and provide meaningful benefits to historically underserved communities, to ultimately improve transportation accessibility and quality of life for people in the communities we serve.

We look forward to working with the City of San Diego in areas where the City and Caltrans have joint jurisdiction to improve the transportation network and connections

"Provide a safe and reliable transportation network that serves all people and respects the environment"

B-1

B-1. Comments noted. These comments provide general information regarding Caltrans' mission and inter-agency coordination efforts.

LETTER

RESPONSE

Ms. Sara Osborn, Development Project Manager 3
April 24, 2023
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between various modes of travel, with the goal of improving the experience of those who use the transportation system.

Caltrans has the following comments:

Hydrology and Drainage Studies

- Caltrans generally does not allow development projects to impact hydraulics within the State's Right-of-Way (R/W). Any modification to the existing Caltrans' drainage and/or increase in runoff to State facilities will not be allowed.
- The drainage study shows that the on-site drainage for this property flows away from Caltrans' R/W and towards Sorrento Valley Road in both existing and proposed condition. The flow at the downstream outfall (at Sorrento Valley Road) is basically the same in the existing and proposed condition. No additional hydraulic comments for this submittal. We want to ensure that water flows from the property towards the street (Sorrento Valley Road), and does not flow towards the I-5 freeway.

Geotechnical

- The development is adjacent to the I-5 freeway lanes. There is a 30' tall retaining wall within Caltrans' R/W that supports the embankment, just east of the proposed project's property line.
- Please provide a plan set of the proposed development for Caltrans' review.
- Please provide geotechnical reports. Project geotechnical reports should address the impact of new development (especially excavation and construction) to Caltrans' retaining wall.

Complete Streets and Mobility Network

Maintaining bicycle, pedestrian, and public transit access during the project's construction is important. Ensure that mitigation is provided to maintain bicycle, pedestrian, and public transit access during construction, and is in accordance with Caltrans' goals and policies.

Hauling

The California Department of Transportation (Caltrans) has discretionary authority with respect to highways under its jurisdiction and may, upon application and if good cause appears, issue a special permit to operate or move a vehicle or combination of vehicles or special mobile equipment of a size or weight of vehicle or load exceeding the maximum limitations specified in the California Vehicle Code. The Caltrans Transportation Permits Issuance Branch is responsible for the issuance of these special transportation permits for oversize/overweight vehicles on the State Highway network. Additional information is provided online at: <http://www.dot.ca.gov/trafficops/permits/index.html>

"Provide a safe and reliable transportation network that serves all people and respects the environment!"

- B-2. Comments noted. As described and illustrated in the Drainage Study (Omega Engineering Consultants, September 27, 2021), on- and off-site flows from two drainage basins would be captured and directed westerly (away from the I-5 freeway) toward Sorrento Valley Road.
- B-3. The Geotechnical Investigation (Geocon Incorporated, 2021, page 2) described the 30-foot retaining wall on the east side of the property that supports the adjacent Interstate 5 (I-5) Bypass. The geotechnical consultant concluded that the planned development can be constructed in accordance with their recommendations and do not expect the planned development would destabilize or result in settlement of adjacent properties if properly constructed (General Recommendation 7.1.8, page 11). Construction and design recommendations related to retaining walls are also outlined in Section 7.9 (page 25). The Geotechnical Investigation has been reviewed and approved by City Geology staff to be prepared in conformance with the City's Guidelines for Geotechnical Reports.

LETTER

RESPONSE

	<p>B-3. (cont.)</p> <p>As a courtesy, a copy of the proposed development plans and Geotechnical Report has also been provided to Ms. Kimberly Dodson (Caltrans) via e-mail. The Geotechnical Investigation was also available to the public during the draft Public Review and Comment; and will be posted on the City's webpage (https://www.sandiego.gov/ceqa/final) with the Final MND.</p> <p>B-4. Comment noted. Access points to the project site have been reviewed and standard construction practices to maintain access and avoid conflicts could be implemented to ensure safety and comply with Caltrans' goals and policies.</p> <p>B-5. EAS recognizes that Caltrans has the discretionary authority to issue a special permit to operate or move vehicle(s) that may exceed size or weight allowed under California Vehicle Code is noted. EAS has provided this letter to the applicant for their review and acknowledgement.</p>
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LETTER

RESPONSE

Ms. Sara Osborn, Development Project Manager 3
April 24, 2023
Page 3

B-6 **Noise**
The applicant must be informed that in accordance with 23 Code of Federal Regulations (CFR) 772, the Department of Transportation (Caltrans) is not responsible for existing or future traffic noise impacts associated with the existing configuration of I-5.

B-7 **Environmental**
Caltrans welcomes the opportunity to be a Responsible Agency under the California Environmental Quality Act (CEQA), as we have some discretionary authority of a portion of the project that is in Caltrans' R/W through the form of an encroachment permit process. We look forward to the coordination of our efforts to ensure that Caltrans can adopt the alternative and/or mitigation measure for our R/W.

An encroachment permit will be required for any work within the Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide approved final environmental documents for this project, corresponding technical studies, and necessary regulatory and resource agency permits. Specifically, CEQA determination or exemption. The supporting documents must address all environmental impacts within the Caltrans' R/W and address any impacts from avoidance and/or mitigation measures.

We recommend that this project specifically identifies and assesses potential impacts caused by the project or impacts from mitigation efforts that occur within Caltrans' R/W that includes impacts to the natural environment, infrastructure including but not limited to highways, roadways, structures, intelligent transportation systems elements, on-ramps and off-ramps, and appurtenant features including but not limited to fencing, lighting, signage, drainage, guardrail, slopes and landscaping. Caltrans is interested in any additional mitigation measures identified for the project's draft Environmental Document.

B-8 **Right-of-Way**

- There is an easement along the proposed U-Stor-It property and Caltrans' R/W for access, maintenance, and footing. Please see the attached R/W exhibit.
- Per Business and Profession Code 8771, perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction.
- Any work performed within Caltrans' R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction.

"Provide a safe and reliable transportation network that serves all people and respects the environment"

B-6. EAS recognizes that Caltrans is not responsible for existing or future traffic noise impacts associated with the existing configuration of I-5. EAS has provided this letter to the applicant for their review and acknowledgement.

B-7. Comment noted. EAS recognizes that Caltrans is a Responsible Agency under CEQA. The City has coordinated with Caltrans staff to review, address, and receive input on the proposed development associated with this permit application under Caltrans' discretionary authority within their Right-of-Way. EAS has concluded that a Tiered MND would be the appropriate environmental document to disclose potential impacts as a result of the proposed project and required specific measures to mitigate potential impacts to Historic (archaeological) and Tribal Cultural Resources to a level below significance. No additional mitigation measures would be required.

B-8. Caltrans Right-of-Way. If any work is done within the Caltrans Right-of-Way, an encroachment permit may be required. EAS has provided this letter to the applicant for their review and acknowledgement.

LETTER

RESPONSE

B-8
cont.

Ms. Sara Osborn, Development Project Manager 3
April 24, 2023
Page 4

Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (619) 688-6158 or emailing D11.Permits@dot.ca.gov or by visiting the website at <https://dot.ca.gov/programs/traffic-operations/ep>. Early coordination with Caltrans is strongly advised for all encroachment permits.

If you have any questions or concerns, please contact Kimberly Dodson, LDR Coordinator, at (619) 985-1587 or by e-mail sent to Kimberly.Dodson@dot.ca.gov.

Sincerely,

Maurice A. Eaton

MAURICE EATON
Branch Chief
Local Development Review

Attachment: Caltrans' Right-of-Way Map

"Provide a safe and reliable transportation network that serves all people and respects the environment"

TIERED INITIAL STUDY CHECKLIST

1 INTRODUCTION

1.1 Tiered Initial Study

Pursuant to Section 15063 of the California Environmental Quality Act (CEQA) Guidelines (Title 14, California Code of Regulations, Sections 15000 et seq.), an Initial Study is a preliminary environmental analysis that is used by the lead agency as a basis for determining whether an EIR, a Mitigated Negative Declaration, or a Negative Declaration is required for a project. The CEQA Guidelines require that an Initial Study contain a project description, description of environmental setting, identification of environmental effects by checklist or other similar form, explanation of environmental effects, discussion of mitigation for significant environmental effects, evaluation of the project's consistency with existing, applicable land use controls, and the name of persons who prepared the study.

1.2 Tiering Process

This environmental analysis is a Tiered Initial Study for the proposed Torrey Pines U-STOR-IT (referred to as the "proposed project" or "project" throughout this document). This environmental analysis is tiered from the *Complete Communities: Housing Solutions and Mobility Choices Program EIR* in accordance with Sections 15152 and 15168 of the CEQA Guidelines and Public Resources Code Section 21094. The *Complete Communities: Housing Solutions and Mobility Choices Program EIR* was prepared pursuant to Section 15168 of the CEQA Guidelines.

The Complete Communities Mobility Choices (Mobility Choices Program) amended the San Diego Municipal Code (SDMC Chapter 14, Article 3, Division 11) and Land Development Manual to adopt a new CEQA significance threshold for transportation that implements Senate Bill 743 (SB 743), and a program to mitigate vehicle miles traveled (VMT) impacts from new development. The Mobility Choices Program ensures that new development mitigates transportation impacts to the extent feasible.

The CEQA concept of "tiering" refers to the evaluation of general environmental matters in a broad program-level EIR, with subsequent focused environmental documents for individual projects that implement the program. This environmental document incorporates by reference the discussions in the *Complete Communities: Housing Solutions and Mobility Choices Program EIR* and concentrates on project-specific issues. The CEQA Guidelines encourage the use of tiered environmental documents to streamline the environmental review process. This is accomplished in tiered documents by eliminating repetitive analyses of issues that were adequately addressed in the Program EIR and by incorporating those analyses by reference.

Section 15168(d) of the State CEQA Guidelines provides for simplifying the preparation of environmental documents on individual parts of the program by incorporating by reference analyses and discussions that apply to the program as a whole. Where an EIR has been prepared or certified for a program or plan, the environmental review for a later activity consistent with the program or plan should be limited to effects that were not analyzed as significant in the prior EIR or that are susceptible to substantial reduction or avoidance (CEQA Guidelines Section 15152[d]).

1.3 Appropriateness of a Tiered Initial Study

The proposed project would be consistent with the scope of the program as described in the *Complete Communities: Housing Solutions and Mobility Choices Program EIR*. Accordingly, pursuant to Section 15152 of the State CEQA Guidelines, it is appropriate to tier this Initial Study from the *Complete Communities: Housing Solutions and Mobility Choices Program EIR*. This Tiered Initial Study evaluates whether the environmental effects of the proposed project were adequately addressed in the *Complete: Housing Solutions and Mobility Choices Program EIR*. For impacts that were adequately addressed, the Tiered Initial Study provides a cross reference to the relevant discussion in the *Complete Communities: Housing Solutions and Mobility Choices Program EIR*. Project-specific impacts that were not addressed in the *Complete Communities: Housing Solutions and Mobility Choices Program EIR*, are evaluated in detail in this Document. Project specific mitigation has been identified where required.

2 PROJECT INFORMATION

- 2.1 Project title/Project number: Torrey Pines U-STOR-IT/ 697502
- 2.2 Lead agency name and address: City of San Diego, 1222 First Avenue, MS-501, San Diego, California 92101
- 2.3 Contact person and phone number: Sara Osborn / (619) 446-5381
- 2.4 Project location: 11391 Sorrento Valley Road San Diego, CA 92121
- 2.5 Project Applicant/Sponsor's name and address: Peter Nora, U-Stor-It, 501 Broadway, Suite 2020, San Diego, CA 92101, (619)-255-7478.
- 2.6 General/Community Plan designation: Industrial Employment / Industrial
- 2.7 Zoning: IL-3-1
- 2.8 Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):
None required.

3 PROJECT DESCRIPTION

3.1 Environmental setting and surrounding land uses:

The project is located at 11391 Sorrento Valley Road. It is a 1.46-acre site in the IL-3-1 Zone within a designated Industrial area of the Torrey Pines Community Plan. Sorrento Valley Road is to the west, I-5 is at the rear of the property to the east, Industrial development is located to the north and south. The primary access to the property is from Sorrento Valley Road. In addition, the project site is currently served by existing public services and utilities. The project is located in the MCAS Miramar Airport Influence Area (Review Area 1), MCAS Miramar Airport Safety Zones (APZ II and Transition Zone), Coastal Overlay Zone (Non-Appealable), Coastal Height Limitation, Very High Fire Hazard Severity Zone, Prime Industrial Lands, and Transit Priority Area (TPA).

3.2 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.):

The project proposes a Coastal Development Permit and Neighborhood Development Permit to demolish an existing two-story building, and construct a three-story, 166,313 square foot self-storage building on a 1.46 acre site located at 11391 Sorrento Valley Road. The project is zoned IL-3-1 and designated as Industrial in the Torrey Pines Community Plan area. A drainage easement along the west property line and southeastern property line will be vacated. The development includes two basement levels and three levels above ground and includes parking, a management office, and self-storage area.

A drainage easement along the west property line and southeastern property line will be vacated. Right of Way will be dedicated along Sorrento Valley Road and the project will also include a bio-filtration basin, sidewalks, new driveways, street trees, curb and gutter. The project's landscaping has been reviewed by staff and would comply with all applicable City of San Diego Landscape ordinances and standards. Drainage would be directed into appropriate storm drain systems designated to carry surface runoff, which has been reviewed and accepted by City Engineering staff. Ingress to the project site would be via Sorrento Valley Road.

3.3 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 Assembly Bill (AB) 52, the City of San Diego sent Notifications via email to the Native American Tribes traditionally and culturally affiliated with the project area. No tribes responded within the 30-day time period requesting consultation. Please see Section XVII of the Initial Study for more detail.

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.

4 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.

- | | | |
|--|---|---|
| <input type="checkbox"/> Land Use | <input type="checkbox"/> Air Quality | <input type="checkbox"/> Biological Resources |
| <input type="checkbox"/> Energy | <input type="checkbox"/> Geology, Soils, and Seismicity | <input type="checkbox"/> Greenhouse Gas Emissions |
| <input type="checkbox"/> Health and Safety | <input checked="" type="checkbox"/> Historical, Archaeological, and Tribal Cultural Resources | <input type="checkbox"/> Hydrology/Water Quality |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Paleontological Resources | <input type="checkbox"/> Public Services and Facilities |
| <input type="checkbox"/> Public Utilities and Infrastructure | <input checked="" type="checkbox"/> Transportation | <input type="checkbox"/> Wildfire |
| <input type="checkbox"/> Visual Effects and Neighborhood Character | <input checked="" type="checkbox"/> Mandatory Findings of Significance | |

5 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 TIERED 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 TIERED MITIGATED NEGATIVE DECLARATION will be prepared.
- The proposed project MAY have a significant effect on the environment, and a (SUBSEQUENT/SUPPLEMENTAL) 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. A (SUBSEQUENT/SUPPLEMENTAL) ENVIRONMENTAL IMPACT REPORT is required but must analyze only the effects that remain to be addressed.

6 EVALUATION OF ENVIRONMENTAL IMPACTS

The City of San Diego has defined the column headings in the Tiered Initial Study Checklist as follows:

1. "Potentially Significant Impact" is appropriate if there is substantial evidence that the project's effect may be significant. If there is one or more "Potentially Significant Impact" entries a Project EIR will be prepared.
2. "Project Impact Adequately Addressed in PEIR" applies where the potential impacts of the proposed project were adequately addressed in the *Complete Communities: Housing Solutions and Mobility Choices Program EIR*, as specified in the analysis, and will mitigate any impacts of the proposed project to the extent feasible. *Complete Communities: Housing Solutions and Mobility Choices Program EIR* mitigation measures may be incorporated into the project. The potential impact of the proposed project is adequately addressed in the *Complete Communities: Housing Solutions and Mobility Choices Program EIR*. The impact analysis in this document summarizes and cross references (including section/page numbers) the relevant analysis in the *Complete Communities: Housing Solutions and Mobility Choices Program EIR*.
3. "Less Than Significant with Project-level Mitigation Incorporated" applies where the incorporation of project-specific mitigation measures will reduce an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." All project-specific mitigation measures must be described, including a brief explanation of how the measures reduce the effect to a less than significant level.
4. "Less Than Significant Impact" applies where the project will not result in any significant effects. The effects may or may not have been discussed in the *Complete Communities: Housing Solutions and Mobility Choices Program EIR*. The project impact is less than significant without the incorporation of *Complete Communities: Housing Solutions and Mobility Choices Program EIR* mitigation measures or project-specific mitigation.
5. "No Impact" applies where a project would not result in any impact in the category in question or the category simply does not apply. "No Impact" answers do not require an explanation if they are adequately supported by the information sources cited by the lead agency which 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).
6. 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.
7. The discussion in each issue should include the following:
 - Discussion of *Complete Communities: Housing Solutions and Mobility Choices Program EIR* impact (direct and cumulative) conclusions
 - Discussion of potential project impacts
 - Applicable *Complete Communities: Housing Solutions and Mobility Choices Program EIR* mitigation measures assumed in the project
 - Significance determination after *Complete Communities: Housing Solutions and Mobility Choices Program EIR* mitigation measures
 - Additional project-level mitigation measures
 - Significance determination after all mitigation
8. 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.
9. Supporting Information Sources: A source list should be attached, and other sources utilized, or individuals contacted should be cited in the discussion.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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6.1. LAND USE – Would the project:

Issue 1: Cause a significant environmental impact due to a conflict with any land use plan, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

The project site is designated Industrial Employment in the General Plan, designated Industrial in the Torrey Pines Community Plan, and zoned IL-3-1. The proposed storage use would be consistent with the land use designations and zoning. Implementation of the proposed project would not cause significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would not occur.

Issue 2: Lead to the development of conversion of General Plan or community designated open space or prime farmland to a more intensive land use, resulting in a physical division of the community?

The project site has a General Plan land use designation of Industrial Employment and Community Plan land use designation of Industrial. The project site is not designated for open space or prime farmland. The project would replace an existing industrial office building and would not result in a physical division of a community. No impacts would occur.

Issue 3: Result in land uses which are not compatible with an adopted airport land use compatibility plan?

The project is located approximately 8 miles northwest of the Marine Corps Air Station (MCAS) Miramar Airport. According to the Airport Land Use Compatibility Plan (ALUCP) for MCAS Miramar, the project site is located within MCAS Miramar Airport Influence Area (Review Area 1) and MCAS Miramar Airport Safety Zones (APZ II and Transition Zone). However, project implementation would not conflict with the APZ II designation. According to the MCAS Miramar ALUCP, mini-storage uses are conditionally compatible in APZ II provided that the use limits intensity. As discussed in Section 132.1515(d) of the City's Municipal Code, an applicant may request approval of a Neighborhood Development Permit for a non-residential development where an alternative method of calculation is utilized to demonstrate compliance with the maximum intensity (people per acre). When compliance is demonstrated by an alternate method of calculation, a non-residential development may exceed the maximum FAR specified in the applicable safety compatibility table if the maximum intensity limit is not exceeded.

A Neighborhood Development Permit is required for the project to utilize an alternative compliance calculation in accordance with the City's Municipal Code Section 132.1515(d). Using the accepted alternative calculation ratio of 1.1 people per parking space, the maximum number of people on the

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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1.6-acre site is estimated to be 22 people as limited by the number of parking spaces. The project would be restricted to 20 parking spaces to be in compliance with APZ II.

As such, the project would not result in land uses which are not compatible with an adopted ALUCP. Impacts would be less than significant.

6.2. AIR QUALITY: Would the project:

Issue 1: Conflict with or obstruct implementation of the applicable air quality plan?

The project site is located within the San Diego Air Basin (SDAB), which is governed by the San Diego Air Pollution Control District (SDAPCD). The SDAPCD develops and administers local regulations for stationary air pollutant sources within the SDAB, and also develops plans and programs to meet attainment requirements for both federal and state ambient air quality standards (National Ambient Air Quality Standards [NAAQS] and California Ambient Air Quality Standards [CAAQS], respectively). The SDAPCD and the 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 (AAQS) in the SDAB. The current regional air quality plan for San Diego County is SDAPCD’s 2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County (Attainment Plan; SDAPCD 2020). The Attainment Plan, which would be a revision to the state implementation plan (SIP), outlines SDAPCD’s plans and control measures designed to attain the NAAQS for ozone. These plans accommodate emissions from all sources, including natural sources, through implementation of control measures, where feasible, on stationary sources to attain the standards. Mobile sources are regulated by the U.S. Environmental Protection Agency (USEPA) and California Air Resources Board (CARB), and the emissions and reduction strategies related to mobile sources are considered in the Attainment Plan and SIP.

The SDAPCD is required, pursuant to the federal Clean Air Act (CAA), to reduce emissions of criteria pollutants for which the SDAB is in nonattainment. Strategies to achieve these emissions reductions are developed in the Attainment Plan and SIP, prepared by the SDAPCD for the region. Criteria pollutants of primary concern include ozone, carbon monoxide (CO), nitrogen dioxide (NO2), particulate matter (including both respirable particulate matter 10 microns or less in diameter [PM10] and fine particulate matter 2.5 microns or less in diameter [PM2.5]), sulfur dioxide (SO2), and lead. The SDAB is currently designated as a basic nonattainment area for the 8-hour NAAQS for ozone. The SDAB is designated as being in attainment for all other applicable criteria pollutants under the NAAQS. The SDAB is currently classified as a nonattainment area under the CAAQS for ozone, PM10, and PM2.5. It is in attainment for CO, NO2, SO2, and lead relative to state air standards.

Both the Attainment Plan and SIP are based on SANDAG population projections, as well as land use designations and population projections included in general plans for cities located within the County. Population growth is typically associated with the construction of residential units or large employment centers.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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Projects that propose development that is consistent with the growth anticipated by the local jurisdictions' general plans would be consistent with the Attainment Plan. In the event that a project proposes development that is less intensive than anticipated within the General Plan, the project would likewise be consistent with the Attainment Plan. If a project proposes development that is greater than that anticipated in the General Plan and SANDAG's growth projections upon which the Attainment Plan is based, the project would be in conflict with the Attainment Plan and might have a potentially significant impact on air quality. This situation would warrant further analysis to determine whether the project and the surrounding projects exceed the growth projections used in the Attainment Plan for the specific subregional area.

The project would be consistent with the General Plan and Torrey Pines Community Plan and would therefore not result in development that is greater than that anticipated in the General Plan or SANDAG's growth projections upon which the Attainment Plan is based. Furthermore, as detailed in Issue 2, below, the project would not result in a significant air quality impact with regards to construction- and operational-related emissions of ozone precursors or criteria air pollutants. The project would also comply with existing and new rules and regulations as they are implemented by the SDAPCD, CARB, and/or USEPA related to emissions generated during construction. Impacts associated with conformance to regional air quality plans would be less than significant.

Issue 2: 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?

The SDAB is considered a non-attainment under Federal standards for O3 (8-hour standard). As described above in response Issue 3, 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.

Issue 3: Expose sensitive receptors to substantial pollutant concentrations?

Sensitive receptors (i.e., children, senior citizens, and acutely or chronically ill people) are more susceptible to the effects of air pollution than are the general population. Land uses that are considered sensitive receptors typically include residences, schools, playgrounds, childcare centers, hospitals, convalescent homes, and retirement homes. The project is located in an established Industrial area which includes various businesses along Sorrento Valley Road with the closest

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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residences located east across I-5. An analysis of the project’s potential to expose sensitive receptors to pollutants during construction and operation is provided below.

Short-Term (Construction) Emissions

Project construction activities could potentially generate combustion emissions from on-site heavy duty 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 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 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. Impacts from construction emissions would be less than significant.

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 self-storage uses. The project is compatible with the surrounding development and is permitted by the community plan and zoning designation. The project is anticipated to generate approximately 327 average daily trips (ADT), and no significant impacts to traffic volumes would occur. Therefore, automobile emissions that result in violation of air quality standards are not anticipated.

Based on the land use, project emissions over the long-term are not anticipated to violate any air quality standard or contribute substantially to any existing or projected air quality violations. Therefore, air quality impacts related to the exposure of sensitive receptors to substantial pollutant concentrations during construction or operations would be less than significant.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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Issue 4: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

The project could produce odors during proposed construction activities from construction equipment exhaust, application of asphalt, and/or the application of architectural coatings; however, standard construction practices would minimize the odor emissions and their associated impacts. Furthermore, odors emitted during construction would be temporary, short-term, and intermittent in nature, and would cease upon the completion of the respective phase of construction, impacts would be less than significant.

During project operation, the temporary storage of refuse could be a potential source of odor; however, project-generated refuse is required to be stored in covered containers and removed at regular intervals in compliance with the City’s Municipal Code solid waste regulations, thereby precluding significant odor impacts. Furthermore, the proposed project would be required to comply with the aforementioned SDAPCD Rule 51 which prohibits the discharge of odorous emissions that would create a public nuisance. As such, long-term operation of the proposed project would not create objectionable odors affecting a substantial number of people. Impacts would be less than significant.

6.3. BIOLOGICAL RESOURCES – Would the project:

Issue 1: Result in a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the Multiple Species Conservation Program or other local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

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.

Issue 2: Result in a substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development Manual or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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As discussed in Section 6.3, Issue 1 above, the project is developed within an urbanized area. The project would not directly or indirectly impact any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development Manual or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. No impact would result.

Issue 3: Result in a substantial adverse effect on federally protected wetlands (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

The proposed project would redevelop an existing developed site, and no jurisdictional resources occur within the project site. No City or Coastal wetlands occur on-site. Therefore, the project would not result in a substantial adverse effect on federally protected wetlands. No impact would result.

Issue 4: Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery 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 Section 6.3, Issue 1, above.

Issue 5: Result in a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, either within the Multiple Species Conservation Program (MSCP) plan area or in the surrounding region?

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 Multiple Habitat Planning Area (MHPA); more specifically, the project site is identified as a developed community within the Urban Area. Also, refer to Section 6.3, Issue 1, above. 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.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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Issue 6: Result in a conflict with the provisions of any local policies or ordinances protecting biological resources?

Refer to Section 6.3, Issue 5, above. 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.

6.4. ENERGY – Would the project:

Issue 1: Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

The project would be required to meet mandatory energy standards of the current California energy code. Energy used for construction would primarily consist of fuels in the form of diesel and gasoline. Fuel consumed by construction equipment would be the primary energy resource expended over the course of construction and would include the transportation of construction materials and construction worker commutes. Heavy-duty construction equipment associated with construction activities, haul trucks involved in the removal of construction and demolition materials, and smaller support equipment (such as lighting, air compressors, and pumps) would consume petroleum-based fuel. Construction workers would travel to and from the project site throughout the duration of construction, presumably in gasoline-powered vehicles. While construction activities would consume petroleum-based fuels, consumption of such resources would be temporary and would cease upon the completion of construction.

Once operational, the project would result in a self-storage use. Operation of the project would not require a significant increase in energy usage over the existing energy demand at the site. Additionally, long-term energy usage from the building would be reduced through design measures that incorporate energy conservation features in heating, ventilation and air conditioning systems, lighting and window treatments, and insulation and weather stripping. The project would also incorporate cool-roofing materials as required by the Climate Action Plan Consistency Checklist. Activities occurring at the site would be consistent with the zoning and Industrial land use. Therefore, the project would not result in wasteful, inefficient, or unnecessary consumption of energy sources during project construction or operation. Impacts would be less than significant.

Issue 2: Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Refer to Issue 1, above. The project is consistent with the General Plan and the Torrey Pines Community Plan's land use designation. The project has also shown compliance with the City's Climate Action Plan (CAP).

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A CAP Consistency Checklist was completed for the proposed project. Under Step 1 of the CAP Consistency Checklist, the project is consistent with the existing General Plan and Community Plan designations 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 such as, energy and water efficient buildings strategy. 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 plan amendment or a rezone. The project would therefore not conflict with the City's CAP, and no impacts would occur.

6.5. GEOLOGY/SOILS/SEISMICITY – Would the project:

Issue 1: Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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A Geotechnical Investigation was prepared by Geocon Incorporated for the proposed project (Geocon Incorporated, 2021). The study included a review of geologic literature, completion of engineering analyses, soil sampling, and laboratory testing.

Seismically induced surface or ground rupture occurs when movement on a fault deep within the earth breaks through to the surface as a result of seismic activity. Fault rupture almost always follows preexisting faults, which are zones of weakness. Sudden displacements are more damaging to structures because they are accompanied by shaking. According to the Geotechnical Investigation, the project site is not located within a State of California Earthquake Fault Zone and is not underlain by active, potentially active, or inactive faults (Geocon Incorporated 2021).

While there are no known active faults that cross the project site, there are several active faults that run throughout San Diego County. The project site is within a seismically active area and, therefore, can be subject to strong seismic ground motion. 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.

Liquefaction is not anticipated to occur on the project site. According to the Geotechnical Investigation, due to the lack of a permanent, near-surface groundwater table and the very dense nature of the underlying Old Paralic Deposits, liquefaction potential for the site is considered very low. Evidence of landslides were not observed on the project site. Further, given the relatively flat topography of the site, the likelihood for seismically induced landslides is remote. Furthermore, the project would be required to comply with seismic requirement of the California Building Code, utilize proper engineering design and standard construction practices, to be verified at the building permit

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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stage, in order to ensure that would reduce impacts to people or structures to an acceptable level of risk. Impacts would be less than significant.

Issue 2: Result in substantial soil erosion or the loss of topsoil?

The site is relatively flat and is underlain by one surficial soil type (consisting of undocumented fill) and one formational unit (consisting of the Old Paralac Deposits). 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 3: Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

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 Issue 1 above, the project site is not likely to be subject to landslides, and the potential for liquefaction is low.

According to the Geotechnical Investigation prepared for the project site, 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.

Issue 4: Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

According to the Geotechnical Investigation prepared for the project site, the soil encountered in the field investigation is classified as having "Very Low" to "Medium" expansion potential. The project would be constructed consistent with proper engineering design, in accordance with the California

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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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.

6.6. GREENHOUSE GAS EMISSIONS – Would the project:

Issue 1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

The CAP Consistency Checklist is used to ensure project-by-project consistency with the underlying assumptions in the CAP and to ensure that the City would achieve the 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 University 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 at the project level. This includes project features consistent with the energy and water efficient buildings strategy, as well as bicycling, walking, transit, and land use strategy. These project features would be assured as a condition of project approval. Step 3 of the CAP Consistency Checklist would not be applicable, as the project is not proposing a land use amendment or a rezone. Thus, the project is consistent with the CAP.

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

Issue 2: Conflict with City’s Climate Action Plan or another applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Refer to Section 6.6, Issue 1 above. The project would not conflict with the City’s CAP or applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Impacts would be less than significant.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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6.7. HEALTH AND SAFETY – Would the project:

Issue 1: Create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials?

Construction activities associated with the project would require transportation and use of limited quantities of fuel, oil, sealants, and other hazardous materials related to construction. The use of hazardous materials and substances during construction would be subject to federal, state, and local health and safety requirements for handling, storage, and disposal. As a result, hazardous material impacts related to construction activities would be less than significant.

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.

Issue 2: 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?

As discussed above, Section 6.7, Issue 1, limited quantities of hazardous materials such as gasoline, diesel, oils, and lubricants may be required to operate the construction equipment. Construction activities would be short-term, and the use of these materials would cease once construction is complete. The hazardous substances used during construction would be required to comply with existing federal, state, and local regulations regarding the use and disposal of these materials. In the event of an accidental release during construction containment and clean up would be in accordance with existing applicable regulatory requirements.

Project operation may include the transport and use of hazardous materials onsite. However, the project would adhere to all applicable federal, state, and local regulations related to the use of hazardous materials. In the event of an accidental release during operation containment and clean up would be in accordance with existing applicable regulatory requirements. Therefore, the project would not 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. Impacts would be less than significant.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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Issue 3: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The proposed project is not located within one-quarter mile of an existing or proposed school. The nearest school is the Torrey Hills School, which is an elementary school located approximately 2.0 mile east of the project site. Therefore, the project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. No impact would occur.

Issue 4: 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?

The Department of Toxic Substances Control EnviroStor database was used to evaluate the project site and neither the project site nor properties within 1,000 feet are listed within it. The State Water Resources Control Board GeoTracker database was also used to evaluate the project site, and neither the project site nor properties within 1,000 feet are listed within it. Therefore, the project would not create a significant hazard to the public or environment resulting from being included on a list of hazardous materials sites. No impact would occur.

Issue 5: Result in a safety hazard for people residing or working 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?

The project is located approximately 8 miles northwest of the Marine Corps Air Station (MCAS) Miramar Airport. According to the Airport Land Use Compatibility Plan (ALUCP) for MCAS Miramar, the project site is located within MCAS Miramar Airport Influence Area (Review Area 1) and MCAS Miramar Airport Safety Zones (APZ II and Transition Zone). However, project implementation would not conflict with the APZ II designation. According to the MCAS Miramar ALUCP, mini-storage uses are conditionally compatible in APZ II provided that the use limits intensity. As discussed in Section 132.1515(d) of the City's Municipal Code, an applicant may request approval of a Neighborhood Development Permit for a non-residential development where an alternative method of calculation is utilized to demonstrate compliance with the maximum intensity (people per acre). When compliance is demonstrated by an alternate method of calculation, a non-residential development may exceed the maximum FAR specified in the applicable safety compatibility table if the maximum intensity limit is not exceeded.

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A Neighborhood Development Permit is required for the project to utilize an alternative compliance calculation in accordance with the City's Municipal Code Section 132.1515(d). Using the accepted alternative calculation ratio of 1.1 people per parking space, the maximum number of people on the 1.6-acre site is estimated to be 22 people as limited by the number of parking spaces. The project would be restricted to 20 parking spaces to be in compliance with the APZ II designation. As such, the project would not conflict with an ALUCP or result in a safety hazard for people residing or working at the project site. Impacts would be less than significant.

Issue 6: 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.

6.8. HISTORICAL/ARCHAEOLOGICAL/TRIBAL CULTURAL RESOURCES - Would the project:

Issue1: Result in an alteration, including the adverse physical or aesthetic effects and/or destruction of a historic building (including architecturally significant building) structure, object, or site?

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 structure was constructed in 1972 and is identified as being over 45

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years in age. Therefore, additional information was 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.

Issue 2: Result in a substantial adverse change in the significance of a prehistoric or historic archaeological resource, a religious or sacred site, or the disturbance of any human remains those interred outside of formal cemeteries?

Many areas of San Diego County, including mesas and the coast, are known for intense and diverse prehistoric occupation and important archaeological and historical resources. The region has been inhabited by various cultural groups spanning 10,000 years or more. The project area is located within an area identified as sensitive on the City of San Diego’s Historical Resources Sensitivity Maps.

A Phase I Cultural Resource Survey for The Torrey Pines U-Stor-It Project was prepared by Brian F. Smith & Associates (April 7, 2022). The study included a records search, Sacred Lands File search, tribal outreach, a review of historical aerial photographs and maps, and a pedestrian survey of the project Area of Potential Effect (APE) with a Kumeyaay Native American monitor.

The survey concluded no evidence of any archaeological resources were identified within the property during the survey. However, ground visibility was limited as the property has been cleared and impacted by previous development which may have obscured resources. Therefore, the current status of the property appears to have affected the potential to discover any surface scatters of artifacts. Cultural materials that may have been onsite could have been masked by the prior clearing and development of the project parcel.

The records search and background data does show that the prehistoric occupation of the Sorrento Valley, Carmel Valley, and the Los Penasquitos Lagoon area spanned a period of at least 8,000 years and involved a large population of people. Given the prior development within the project and the documented prehistoric occupation of the region, there remains the potential for the development to uncover previously undocumented cultural resources. Therefore, archaeological monitoring and Native American monitoring is required for all earthmoving activities associated with the development. As such, an archaeological and Native American monitor must be present during all grading activities in order to reduce any potential impacts to a level below significance.

A Mitigation Monitoring and Reporting Program, as detailed within Section IV of the Mitigated Negative Declaration would be implemented to reduce impacts related to Historical Resources (Archaeology) to below a level of significance.

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Issue 3: 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:

- a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or,

The project site is not listed nor is it eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k). In addition, please see section 6.8, Issue 1 above. Impacts would not result.

- b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

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, as Lead Agency, determined that there are no sites, features, places or cultural landscapes that would be substantially adversely impacted by the proposed project. Although no Tribal Cultural Resources were identified within the project site, there is a potential for the construction of the project to impact buried and unknown Tribal Cultural Resources due to its location to known recorded resources in the near vicinity.

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In accordance with the requirements of Assembly Bill (AB) 52, The City of San Diego sent notification to the Native American Tribes traditionally and culturally affiliated with the project area on November 11, 2022. No responses were received.

Although no Tribal Cultural Resources were identified within the project site, there is a potential for the construction of the project to impact buried and unknown Tribal Cultural Resources due to its location to known recorded resources in the near vicinity. Therefore, Archaeological and Native American monitoring are included in the MMRP. Mitigation in the form of Archaeological and Native American monitoring would reduce all impacts to Tribal Cultural Resources to below a level of significance. See section IV of the MND and the Mitigation, Monitoring and Reporting Program (MMRP) for further details.

6.9. HYDROLOGY/WATER QUALITY - Would the project:

Issue 1: Result in flooding due to an increase in impervious surfaces or changes in absorption rates, drainage patterns, or the rate of surface runoff?

The discussion below is based on the Storm Water Quality Management Plan (SWQMP) and the Drainage Study prepared by Omega Engineering Consultants (2021).

The project would occur generally within the footprint of the existing developed portion of the site. As discussed in the Drainage Study prepared for the project, the site was analyzed as two onsite drainage basins that encompass the entire building, landscape and hardscape. The site will modify the drainage system but will keep the same discharge point as the existing conditions. The report describes the runoff generated from the westerly portion of the roof from the self-storage facility will drain towards the west directly to a lined biofiltration basin. The northerly and easterly portions of the site will drain to a series of grated inlets along the gutter on the northerly drive aisle. The collected stormwater will drain via pipe flow to a 36-inch precast box inside the lined biofiltration facility. The southerly portion of the site will drain via gutter flow on the southerly drive aisle into a trench drain that will be connected to the lined biofiltration basin. After treatment, the stormwater discharges to the gutter on Sorrento Valley Road via a curb outlet. The offsite flow generated by the southerly property will be bypassed via a brow ditch along the southerly property line and drain on a F-type catch basin, thence to a curb outlet and ultimately on the gutter along Sorrento Valley Road. According to the report, the proposed improvements result in a decrease of generated runoff during the peak of the 100-year, 6-hr storm. The result is a peak storm water flowrate that is less than the existing conditions by 0.01 cfs. Through project design, the project’s peak flows are no greater than pre project conditions.

Additionally, a Stormwater Pollution Prevention Plan (SWPPP) would be prepared in compliance with the Construction General Permit. The SWPPP would identify erosion control and sediment control best management practices (BMPs) that would be implemented to minimize the occurrence of soil erosion. Therefore, the project would not substantially increase impervious surfaces, absorption

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rates, or the rate of surface runoff. The project is a Priority Development Project (PDP) and, therefore, a SWQMP has been prepared. The PDP SWQMP includes construction and post-construction BMPs in compliance with the City and Regional Water Quality Control Board (RWQCB) regulations such as low-impact development (LID) design practices which include source control and hydromodification designs. Implementation of these LID BMPs under the PDP SWQMP would preclude any potential violations of applicable standards and discharge violations.

The project would not result in flooding due to an increase in impervious surfaces or changes in absorption rates, drainage patterns, or the rate of surface runoff. Impacts would be less than significant.

Issue 2: Result in a substantial increase in pollutant discharge to receiving waters and increase of identified pollutants to an already impaired water body?

Refer to the discussion under Section 6.9, Issue 1 above. The project would not result in significant runoff through the incorporation of an underground detention vault. A SWPPP would be prepared in compliance with the Construction General Permit, which would identify erosion control and sediment control BMPs that would be implemented to minimize the occurrence of soil erosion. A PDP SWQMP has also been prepared for the project which includes construction and postconstruction BMPs such as source control and hydromodification designs, which would prevent pollutant discharge to receiving waters. Therefore, the project would not result in a substantial increase in pollutant discharge to receiving waters and increase of identified pollutants to an already impaired water body. Impacts would be less than significant.

Issue 3: Deplete groundwater supplies, degrade groundwater quality, or interfere with groundwater recharge?

There is no groundwater extraction occurring or planned at the project site; therefore, there would be no disruption to any existing groundwater levels or well production. In relation to impervious surfaces that could interfere with groundwater recharge, 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. Therefore, the project would not result in flows that may interfere with groundwater quality. Impacts related to groundwater would be less than significant.

6.10. NOISE - Would the project:

Issue 1: Result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established

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in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Noise

Construction of the project would generate a temporary increase in noise in the project area. Short term 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.

Issue 2: Cause the generation of, excessive groundborne vibration or groundborne 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 Issue 1 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 does not require pile driving and the use of pylons. Impacts would be less than significant.

Issue 3: Be located within the vicinity of a private airstrip or 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 project area to excessive noise levels?

The proposed project is located approximately 8 miles northwest of the MCAS Miramar Airport. Although the project is located within APZ II for MCAS Miramar, the project site is not located within the MCAS Miramar noise contours provided in the ALUCP. Therefore, the project occupants would not be exposed to significant noise levels related to an airport. Impacts would be less than significant.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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6.11. PALEONTOLOGICAL RESOURCES - Would the project:

Issue 1: Result in development that requires over 1,000 cubic yards of excavation in a high resources potential geologic deposit/formation/rock unit or over 2,000 cubic yards of excavation in a high resources potential geologic deposit/formation/rock unit

According to the Geotechnical Investigation prepared for the project, the project site is underlain with undocumented fill and Very Old Paralac Deposits (Geocon Incorporated, 2021). The potential for paleontological resources in undocumented fill is extremely low. The Very Old Paralac Deposits represent a marine and/or non-marine terrace deposit and the potential for paleontological resources is high. The project is anticipated to involve 30,164 cubic yards of soil during excavation at a depth of 23.64 feet which may result in a significant impact to paleontological resources during construction. However, in accordance with San Diego Municipal Code Section 142.0151 (Paleontological Resources Requirements for Grading Activities), the project would require paleontological monitoring during grading and/or excavation activities as outlined in the City's Land Development Manual Appendix P, General Grading Guidelines for Paleontological Resources. Adherence to Section 142.0151 of the San Diego Municipal Code would reduce impacts to a less than significant level.

6.12. PUBLIC SERVICES AND FACILITIES - Would the project:

Issue 1: Promote growth patterns resulting in the need for and/or provision of new or physically altered public facilities (including police, fire-rescue, schools, libraries, parks, or other recreational facilities), the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

The City of San Diego Police Department provides police services for the project site, and the City of San Diego Fire-Rescue Department provides fire-rescue services for the project site. The proposed project would not change existing demand for police or fire protection services because operation of the project would not result in a substantial increase in employees or population. The project is for a self-storage use consistent with the site's zoning of Industrial and land use designation of Industrial. Therefore, the project would not substantially increase the need for new police or fire department staff or facilities. Additionally, the project would not introduce inhabitants to the project area that would require additional schools, parks, or other recreational facilities. Impacts would be less than significant.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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Issue 2: Increase the use of existing neighborhood and regional recreational facilities such that substantial deterioration of the facility would occur or be accelerated?

The proposed project involves the redevelopment of an industrial site into self-storage. The project would not introduce inhabitants or visitors that would use existing recreational facilities or create the need for new facilities. The proposed project would not result in physical deterioration of an existing open space area or any recreation facilities. Therefore, no impacts would occur.

Issue 3: Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

The proposed project does not involve or require the construction or expansion of recreational facilities. Therefore, no impacts would occur.

6.13. PUBLIC UTILITIES AND INFRASTRUCTURE - Would the project:

Issue 1: Use excessive amounts of water beyond projected available supplies?

The project involves the redevelopment of an industrial site, consistent with the zoning and land use designation of Industrial use. Additionally, the project does not meet the CEQA significance thresholds requiring the need for the project to prepare a water supply assessment. The project would not result in a population increase or significant increase in water usage at the site over existing conditions. Therefore, the project would not use excessive amounts of water beyond projected available supplies. Impacts would be less than significant.

Issue 2: Promote growth patterns resulting in the need for and/or provision of new or physically altered utilities, the construction of which could cause significant environmental impacts in order to maintain service ratios, or other performance objectives?

The project involves the redevelopment of an industrial site and does not include the construction of residences and would not directly or indirectly result in a population increase that would create the need for new or physically altered utilities. As discussed under Section 6.13, Issue 1 above, there are sufficient water supplies to support the proposed project. As discussed under Section 6.13, Issue 3 below, the project would generate waste during preconstruction, construction, and operation. However, the project would not generate excessive amounts of waste that would require the need

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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for new or physically altered waste disposal facilities. The project would also provide trash and recycling storage space per the City Storage Ordinance. Furthermore, the project would be required to comply with the City's Municipal Code (including the Refuse and Recyclable Materials Storage Regulations (Municipal Code Chapter 14, Article 2, Division 8), Recycling Ordinance (Municipal Code Chapter 6, Article 6, Division 7), and the Construction and Demolition (C&D) Debris Deposit Ordinance (Municipal Code Chapter 6, Article 6, Division 6)) for diversion of both construction waste during the demolition phase and solid waste during the long-term, operational phase. Additionally, the project would provide adequate organic waste disposal space as adopted by the City.

The project would not promote growth patterns resulting in the need for new or physically altered utilities. Impacts would be less than significant.

Issue 3: Result in impacts to solid waste management, including the need for construction of new solid waste infrastructure including organics management, materials recovery facilities, and/or landfills; or result in development that would not promote the achievement of a 75 percent target for waste diversion and recycling as required under AB 341 and the City's Climate Action Plan?

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 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 166,313 total gross square feet and would not exceed the City's threshold; therefore, the project would not result in a direct impact.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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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.

Regarding trash and recycling storage space during operation, for the proposed buildings, the project would provide trash and recycling storage space, per the City Storage Ordinance. The project would comply with the City Recycling Ordinance by providing adequate space, bins, and educational materials for recycling during occupancy. Additionally, the project would provide adequate organic waste disposal as required by the City.

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.

6.14. TRANSPORTATION – Would the project:

Issue 1: Conflict with an adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle, and pedestrian facilities?

The assessment below compares proposed project impacts to the transportation analysis within the Complete Communities: Housing Solutions and Mobility Choices Program PEIR (City 2020). The analysis of the proposed project’s impacts is based on the VMT Assessment (Linscott, Law & Greenspan Engineers, 2022) prepared for the project.

Complete Communities: Housing Solutions and Mobility Choices Final PEIR

The Complete Communities PEIR found that the Complete Communities project would not conflict with adopted transportation policies, plans, and programs including those supporting transit, bicycle, and pedestrian facilities. The project incentivized the development of high-density multifamily residential development near existing transit areas. The Complete Communities project would support the goals of the City’s General Plan, CAP, and San Diego Forward: The Regional Plan, because it supported high densities within proximity to transit. Impacts would be less than significant.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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Project

The project proposes to demolish an existing vacant two-story building and construct a new three-story self-storage building with 168,643 total gross square footage and would be consistent with the zoning and land use designation of Industrial. According to the VMT Assessment, the Project is calculated to generate 327 average daily trips (ADT) (Linscott, Law & Greenspan Engineers, 2022). This amount of trips would not conflict with applicable transportation regulations or plans.

Therefore, the project would not conflict with an adopted program, plan, ordinance, or policy addressing the transportation system. Impacts would be less than significant and consistent with the findings in the Complete Communities PEIR.

As no policy conflicts had been identified, cumulative impacts related to transportation policy would be less than significant.

Issue 2: Be located within an area on the SANDAG VMT screening maps estimated to generate resident VMT per capita greater than 85 percent of the base year regional average? For mixed-use projects with a commercial component, would the project be located within an area on SANDAG VMT screening maps estimated to generate resident VMT per capita and/or employee VMT per employee greater than 85 percent of the base year regional average?

Complete Communities: Housing Solutions and Mobility Choices Final PEIR

The Complete Communities PEIR found that while VMT related impacts in the majority of the Housing Program project areas would result in less than significant impacts where development is located in VMT efficient areas (at or below 85 percent of the regional average), impacts in less efficient VMT per capita and per employee areas (greater than 85 percent of the regional average) would remain significant and unavoidable. Although development under the Housing Program combined with improvements resulting from the Mobility Choices Program were anticipated to result in the implementation of infrastructure improvements that could result in reductions in per capita VMT, at a program level, it could not be determined whether those improvements would sufficiently reduce potentially significant VMT impacts to below the threshold of significance. The Mobility Choices Program would provide for additional transportation infrastructure and amenities that would support reductions in per capita VMT. Implementation of such infrastructure and amenities would not be associated with significant VMT related impacts, and impacts would be less than significant. Although the Mobility Choices Program was anticipated to result in the implementation of infrastructure improvements that could result in per capita VMT reductions, at a program level, potentially significant VMT impacts could nonetheless remain significant because it could not be determined with certainty whether the improvements would be implemented at the time a future development project's VMT impacts could occur and whether those impacts would be

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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mitigated to a less than significant level. VMT impacts associated with development under the Housing Program located in less efficient VMT areas would be significant and unavoidable for both VMT per capita and VMT per employee.

The VMT analysis provided is by nature a cumulative issue. Thus, cumulative VMT impacts at this level of programmatic review would be significant for development occurring under the Housing Program located within areas on the SANDAG maps estimated to generate VMT per capita and VMT per employee greater than 85 percent of the base year regional average as discussed above.

Project

On September 27, 2013, Governor Jerry Brown signed SB 743 into law and started a process intended to fundamentally change transportation impact analysis as part of CEQA compliance. The Office of Planning and Research (OPR) published its latest Technical Advisory on Evaluating Transportation Impacts in CEQA to the California Natural Resources Agency in December 2018. This Technical Advisory provides recommendations on how to evaluate transportation impacts under SB 743. These changes include elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant CEQA transportation impacts. The OPR guidance covers specific changes to the CEQA Guidelines and recommends elimination of auto delay for CEQA purposes and the use of VMT, as the preferred CEQA transportation metric. This new legislation requires the selection of a VMT analysis methodology, establishment of VMT thresholds for CEQA transportation impacts, and identification of feasible mitigation strategies.

The VMT Assessment prepared for the project was prepared in accordance with the City of San Diego Transportation Study Manual (TSM), which are consistent with OPR's recommendations and evaluate potential transportation impacts metric. The City of San Diego TSM includes screening criteria, significance thresholds, analysis methodology, and mitigation.

According to the VMT Assessment, the TSM standards for the Project as an Industrial or Agricultural Employment project is identified as, "VMT per Employee will be considered the same as the VMT per Employee of the census tract in which it is located." Per the current SANDAG VMT screening maps (Series 14 ABM 2+ Base Year 2016) available on the website, the Project site is located in Census Tract 83.39 with a commute VMT per Employee of 25.1. The regional average commute VMT per Employee is 18.9 miles. The Project's VMT per Employee is 132.9% of the regional average. The Project would therefore have a significant VMT impact based on the significance threshold for an Industrial or Agricultural Employment project of equal to or less than the regional average VMT per Employee.

The Project's participation in the City of San Diego's Complete Communities Mobility Choices Program relies upon the Findings and Statement of Overriding Considerations (SOC) from the Complete Communities: Housing Solutions and Mobility Choices Final Program Environmental

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Impact Report (PEIR) as mitigation to the extent feasible for the Project's significant unmitigated VMT transportation impact.

The San Diego Municipal Code (SDMC) Ordinance Number O-21274, provides the development regulations for the Mobility Choices portion of the Complete Communities program. According to the ordinance, a site where any of the premises is located either partially or entirely in a TPA is defined as Mobility Zone 2. As stated in Section 2.1 of the VMT Assessment, the Project is located within a TPA, and is therefore located in Mobility Zone 2. Per SDMC Section 143.1103(b)(1), development in Mobility Zone 2 shall include either VMT reduction Measures totaling at least 5 points per the Land Development Manual Appendix T (Mobility Choices Regulations: Implementation Guidelines) or payment of the Active Transportation In Lieu Fee per SDMC Section 143.1103(b)(5).

The Project will pay the Active Transportation In Lieu Fee, to be established during the building permit review phase. Therefore, the Project will mitigate its significant VMT transportation impact to the extent feasible by opting in to the Mobility Choices program regulations and relying upon the Findings and SOCs from the Complete Communities: Housing Solutions and Mobility Choices Final PEIR.

Therefore, the project would mitigate its significant VMT impact to the extent feasible by implementing the City's Complete Communities Mobility Choices program and by paying into the Active Transportation In Lieu Fee and relying upon the Findings and SOCs from the Complete Communities: Housing Solutions and Mobility Choices Final PEIR.

Issue 3: Substantially increase hazards due to a geometric design features (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?

Complete Communities PEIR

The Complete Communities PEIR found that although the project did not propose specific changes to roadways, future projects implemented in accordance with the Housing Program may include transportation improvements. Additionally, transportation improvements would result from implementation of the Mobility Choices Program. Any proposed improvements to roadways or amenities such as bicycle facilities would undergo review and approval by the City Engineer. Adherence to the City standards, including the City's Street Design Manual, would ensure that a substantial increase in hazards or incompatible uses would not occur as part of the project. The project did not include any requirements that would result in a substantial increase in hazards due to design features or incompatible uses. Impacts would be less than significant.

The Complete Communities PEIR found that cumulative impacts associated with increased hazards due to design features would be less than significant as the project would support transportation infrastructure and amenities intended to increase multi-modal accessibility and safety. Development associated with Housing Program would occur in existing Mobility Zones 1, 2, and 3. Cumulative

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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impacts associated with hazardous geometric design features or incompatible uses would be less than significant.

Project

Access points to the site has been 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 geometric design features and paved internal roadways would not include sharp curves or intersections. Rather, the project would include roadway improvements to local roadways. A new median would be placed in the center of the Sorrento Valley Road right of way and was designed to be consistent with City standards. The project would not include any project elements that could create a hazard to the public. Therefore, impacts would be less than significant and would be consistent with the findings in the Complete Communities PEIR.

Issue 4: Result in inadequate emergency access?

Complete Communities PEIR

The Complete Communities PEIR determined that future development allowed under the proposed ordinances would be required to comply with all applicable City codes and policies related to emergency access including the California Fire Code, the San Diego Municipal Code Chapter 5, Article 5, Division 87: Appendix D – Fire Apparatus Access Roads, and City Fire Policies A-14-1 Fire Access Roadways, A-14-9 Access Roadways: Modified Roadway Surface, and A-14-10 Fire Apparatus Access Road for Existing Public Streets. The project did not include any requirements that would result in inadequate emergency access. The project would include the construction of three 30-footwide driveways per current City Standards, adjacent to the site on North Torrey Pines Road with the northernmost driveway for emergency access only. In addition, as development would occur under the project, emergency access would be ensured by the Fire Marshal. Impacts related to emergency access would be less than significant.

The Complete Communities PEIR found that cumulative impacts associated with emergency access would be less than significant as the project would support transportation infrastructure and amenities intended to increase multi-modal accessibility and safety that would not conflict with emergency access. Development associated with Housing Program would occur in existing Mobility Zones 1, 2, and 3. Cumulative impacts associated with emergency access would be less than significant.

Project

As stated in Issue 3 above, 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. Therefore, the project would

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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provide adequate emergency access. Impacts would be less than significant and would be consistent with the findings in the Complete Communities PEIR.

6.15. WILDFIRE - Would the project:

Issue 1: Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?

According to the California Department of Forestry and Fire Protection’s (CAL FIRE’s) map of Very High Fire Hazard Severity Zones (VHFHSZ) prepared for the city of San Diego, the project site and the majority of the surrounding area is located within a Local Responsibility Area VHFHSZ (CAL FIRE 2009). However, implementation of the project would not increase wildland fire risk at the site over existing conditions. The project would redevelop an industrial site that is consistent with the site’s zoning and land use designation. The project would install standard fire safety features and construct buildings in compliance with the fire regulations in the CBC. Therefore, the project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant.

Issue 2: Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

As discussed under Section 6.15, Issue 1 above, the VHRHSZ map prepared by CAL FIRE for the city of San Diego classifies the project site and the majority of the surrounding area is located within a VHRHSZ (CAL FIRE 2009). Areas are classified based on their terrain, weather, and other factors relevant to exacerbating wildfires. The project would redevelop the site as a self-storage use that is consistent with the zoning and land use designation. The project would install standard fire safety features and construct buildings in compliance with the fire regulations in the CBC. Therefore, the project would not expose project occupants to pollutant concentrations from a wildfire of the uncontrolled spread of a wildfire due to slope, prevailing winds, and other factors. Impacts would be less than significant.

Issue 3: Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

The project has a zoning and land use designation of Industrial. The project would redevelop as a self-storage use and would not install infrastructure such as roads, fuel breaks, emergency water sources, power lines, or other utilities that may exacerbate fire risk. The project would construct a

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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center median in the adjacent roadway; however, such improvement would not exacerbate fire risk and no new roads would be introduced as a result of the project. If the project requires underground utility installation or connections, the utilities would be minimal and similar to the surrounding area. Construction work would be both minimal and temporary and would not exacerbate fire risk or result in temporary or ongoing impacts to the environment. Impacts would be less than significant.

Issue 4: Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

As stated in Section 6.15, Issue 2 above, the proposed project would not exacerbate wildfire risks due to slope, prevailing winds, and other factors, and would not expose project occupants to significant levels of pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. The risk of people and structures experiencing significant risks such as downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes is negligible. As such, impacts would be less than significant.

6.16. VISUAL EFFECTS AND NEIGHBORHOOD CHARACTER – Would the project:

Issue 1: Result in a substantial obstruction of a vista or scenic view from a public viewing area?

A scenic vista is generally defined as a public viewpoint that provides expansive or notable views of a highly valued landscape and are typically identified in planning documents, such as a community plan. The project site is currently occupied by an existing building and does not include a public viewing area. Implementation of the project would replace the existing buildings with a self-storage use, which would be of similar in height to the existing structure. The project would not block views or remove scenic vistas at the site because none are currently available. Impacts would be less than significant.

Issue 2: Result in a substantial adverse alteration (e.g., bulk, scale, materials, or style) to the existing or planned (adopted) character of the area?

The project is redeveloping an Industrial site and would be consistent with the site’s zoning and land use designation. The project would also have similar character to the nearby industrial land uses. Therefore, the project would not result in a substantial adverse alternation to the existing or planned character of the area. Impacts would be less than significant.

Issue 3: Result in the loss of any distinctive or landmark tree(s), or stand of mature trees?

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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The project site is currently developed, and project implementation may result in the removal of onsite ornamental trees; however, the project would not result in the loss of any distinctive or landmark trees, or stand of mature trees. Project landscaping includes a variety of trees, shrubs, vines, and ground cover consistent with the City’s Landscape Regulations. Impacts would be less than significant.

Issue 4: Result in a substantial change in the existing landform?

Project implementation would require earthwork such as grading and excavation during construction activities. However, ground-disturbing construction activities would be typical of construction of similar land uses. The project is currently developed as industrial use and would be replaced by a two-story self-storage building over two basement levels. The existing landform at the site would not be substantially altered. Impacts would be less than significant.

Issue 5: Create substantial light or glare which would adversely affect daytime 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 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.

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.

6.17 AGRICULTURAL AND FOREST RESOURCES - - Would the project:

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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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.

Issue 1: Convert 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.

Issue 2: Conflict with existing zoning for agricultural use, or a Williamson Act Contract?

Refer to Issue 1 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 3: Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 1220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

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.

Issue 4: Result in the loss of forest land or conversion of forest land to non-forest use?

Refer to Issue 3 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.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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6.18. MINERAL RESOURCES -- Would the project:

Issue 1: Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

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.

Issue 2: Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

Refer to Issue 1 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.

6.19. POPULATION AND HOUSING -- Would the project:

Issue 1: 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.

Issue 2: Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

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

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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6.17. MANDATORY FINDINGS OF SIGNIFICANCE – The lead agency shall find that a project may have a significant effect on the environment and thereby require an EIR to be prepared for the project where there is substantial evidence, in light of the whole record, that any of the following conditions may occur. Where prior to commencement of the environmental analysis a project proponent agrees to mitigation measures or project modifications that would avoid any significant effect on the environment or would mitigate the significant environmental effect, a lead agency need not prepare an EIR solely because without mitigation the environmental effects would have been significant (per Section 15065 of the State CEQA Guidelines):

- 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 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 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.

The project would have the potential to result in significant impacts to cultural or tribal cultural resources and paleontological resources. However, implementation of City regulations to monitor Paleontological resources would reduce potential impacts to less than significant. Impacts to cultural or tribal cultural resources would be reduced to a less than significant level with implementation of mitigation measures.

- b) Does the project have impacts that are individually limited but cumulatively considerable (“cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?
-

Cumulative impacts are defined as two or more individual project effects that, when considered together or in concert with other projects, combine to result in a significant impact (CEQA Guidelines Section 15355). There is potential for the construction schedules of other projects in the city to overlap. Construction would not impact biological resources. Construction of the proposed project would have the potential to impact to cultural and tribal resources; however, impacts would be specific to the site and would not contribute to cumulative impacts. The project may result in

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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impacts to paleontological resources that would be reduced to less than significant through standard paleontological monitoring required by San Diego Municipal Code Section 142.0151; and would also be site-specific. Construction noise and vibration would be far below the applicable thresholds, and therefore would not contribute to cumulative noise impacts. Additionally, all nearby projects would be required to comply with existing federal, state, and local regulations.

Cumulative transportation impacts are discussed in Section 6.14 above. As discussed, the project would not result in cumulative transportation impacts related to conflicting with a circulation plan, implementing hazardous design features or incompatible uses or resulting in emergency access. While the project would result in a significant project-level impact related to VMT, the project would be consistent with the findings in the Complete Communities PEIR and would implement VMT reduction measures to reduce impacts to the extent feasible. Therefore, the project would not result in new cumulative impacts that have not previously been analyzed in the Complete Communities PEIR.

The project would be consistent with the site’s land use designation and zoning. Therefore, the project would be consistent with applicable planning documents, and operation of the project would not cause significant impacts that could contribute to cumulative impacts. The project would not result in impacts that are individually limited but cumulatively considerable.

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

The proposed project would adhere to regulatory codes, ordinances, regulations, standards, and guidelines applicable to each of the environmental issue areas analyzed herein. As described above, the project would have a less than significant impact on air quality and greenhouse gas emissions and would not result in emissions that would significantly impact sensitive receptors. The project would not have the potential to cause adverse effects on human beings through the use, transport, or storage of hazardous materials through adherence to applicable regulations. Additionally, the project would not generate noise or vibrations at such levels that would have substantial adverse effects on human beings. Impacts would be less than significant.

7 SUPPORTING INFORMATION SOURCES

Land Use

City of San Diego. General Plan. 2008.

City of San Diego. Torrey Pines Community Plan. Adopted April 16, 1996, Amended Aug. 14, 2014.

San Diego County Regional Airport Authority. 2011. MCAS Miramar Airport Land Use Compatibility Plan. November.

Air Quality

California Air Resources Control Board (CARB). 2005. Air Quality and Land Use Handbook: A Community Health Perspective. April.

San Diego County Air Pollution Control District (SDAPCD). 2020. 2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County. October.

Biology

City of San Diego (City). 2018. City of San Diego Municipal Code, Land Development Code, Biology Guidelines. Amended. February 1 by Resolution No. R-311507. Available at: https://www.sandiego.gov/sites/default/files/amendment_to_the_land_development_manual_biology_guidelines_february_2018_-_clean.pdf.

1997. Multiple Species Conservation Program: City of San Diego MSCP Subarea Plan. March. Available at: <https://www.sandiego.gov/sites/default/files/legacy/planning/programs/mscp/pdf/subareafullversion.pdf>.

Energy

Geology/Soils/Seismicity

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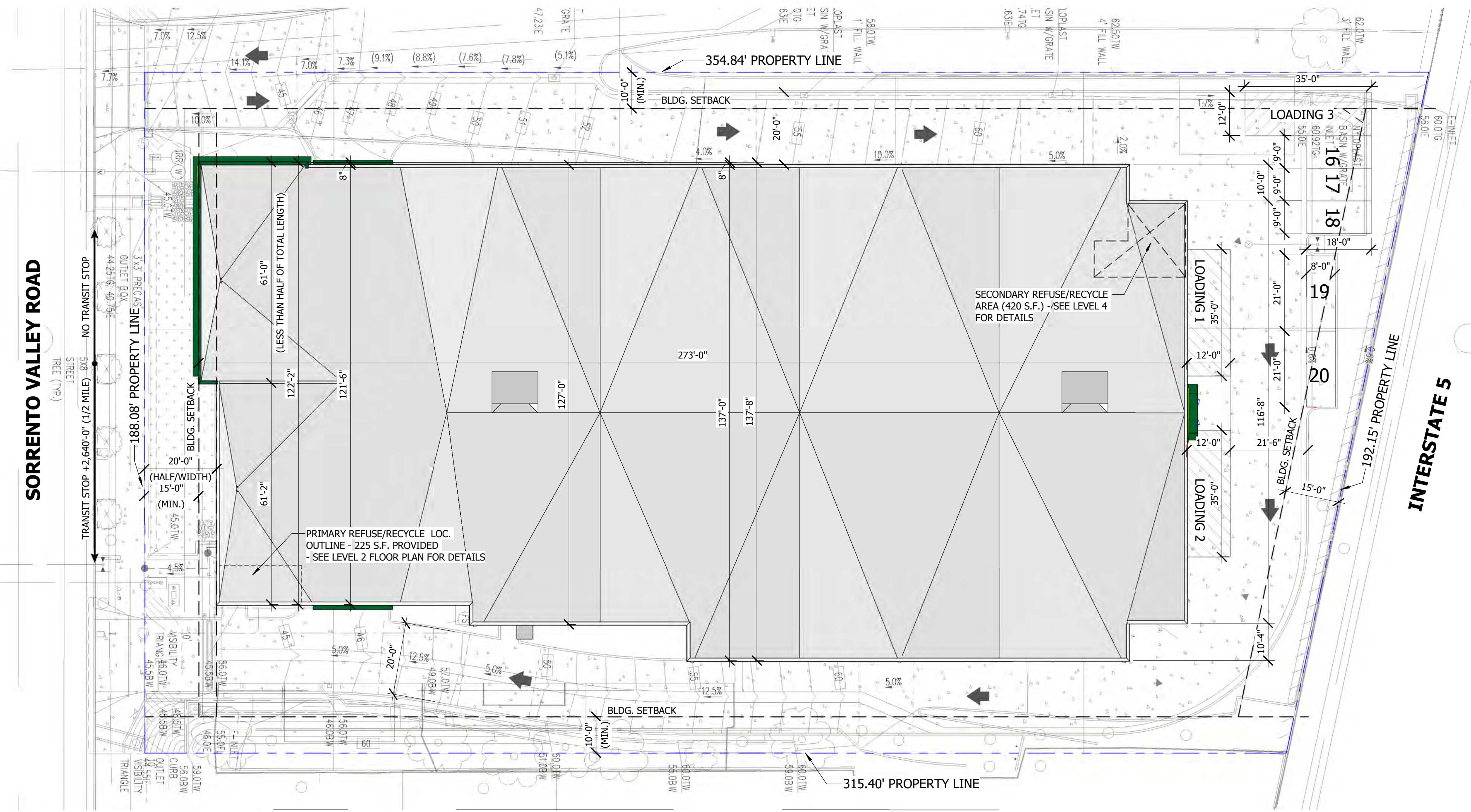
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8 LIST OF ABBREVIATED TERMS

AAQS Ambient Air Quality Standards
 AB Assembly Bill
 ADD Assistant Deputy Director
 ADT average daily trips
 AICUZ Air Installations Compatible Use Zone
 ALUCP Airport Land Use Compatibility Plan
 APE Area of Potential Effect
 APZ II Accident Potential Zone II
 BCME Biological Construction Mitigation/Monitoring Exhibit
 BMP best management practice
 CAA Clean Air Act
 CAAQS California Ambient Air Quality Standards
 CAL FIRE California Department of Forestry and Fire Protection
 CalRecycle California Department of Resources Recycling and Recovery
 Caltrans California Department of Transportation
 CAP Climate Action Plan
 CARB California Air Resources Board
 CBC California Building Code
 CCC California Coastal Commission
 C&D construction and demolition
 CDP Coastal Development Permit
 CEQA California Environmental Quality Act
 CFS cubic feet per second
 CO carbon monoxide
 CO_{2e} carbon dioxide equivalent
 CRPR California Rare Plant Rank
 CRZ critical root zone
 CSVR Consultant Site Visit Record
 CUP Central Utility Plant / Conditional use Permit
 dBA A-weighted decibels
 DOC California Department of Conservation
 DPM diesel particulate matter
 DTSC Department of Toxic Substances Control
 ESHA environmentally sensitive habitat area
 ESL environmentally sensitive lands
 FAR Floor Area Ratio
 GHG greenhouse gas
 gpm gallons per minute
 HRA health risk assessment
 HVAC heating, ventilation, and air conditioning
 LCP Local Coastal Program
 L_{EQ} equivalent continuous sound level
 LID low-impact development
 L_{MAX} maximum reference noise level
 LOS Level of Service
 MCAS Marine Corps Air Station
 MEI maximally exposed individual
 MHPA Multiple Habitat Planning Area

MMC Mitigation Monitoring Coordination
MMT million metric tons
MSCP Multiple Species Conservation Plan
NAAQS National Ambient Air Quality Standards
NAHC Native American Heritage Commission
NDP Neighborhood Development Permit
NO₂ nitrogen dioxide
NPDES National Pollution Discharge Elimination System
OPR Office of Planning and Research
PCE perchloroethylene
PDP Priority Development Project
PM₁₀ respirable particulate matter 10 microns or less in diameter
PM_{2.5} fine particulate matter 2.5 microns or less in diameter
PPV peak particle velocity
R&D research and development
RWQCB Regional Water Quality Control Board
SANDAG San Diego Association of Governments
SB Senate Bill
SDAB San Diego Air Basin
SDAPCD San Diego Air Pollution Control District
SDP Site Development Permit
SIP state implementation plan
SMAQMD Sacramento Metropolitan Air Quality Management District
SO₂ sulfur dioxide
SWPPP Storm Water Pollution Prevention Plan
SWQMP Storm Water Quality Management Plan
SWRCB State Water Resources Control Board
TAC toxic air contaminant
TM Tentative Parcel Map
TPZ tree protection zone
TSM Transportation Study Manual
USEPA U.S. Environmental Protection Agency
VHFHSZ Very High Fire Hazard Severity Zone
VMT vehicle miles traveled
WMP Waste Management Plan



1 ARCHITECTURAL SITE PLAN
1" = 20'-0"

F.A.R. CALCULATION	
LOT AREA	63,781 S.F.
F.A.R. (PER BASE ZONE)	2.0
ALLOWABLE AREA	127,562 S.F.
LEVEL 5	35,028 S.F.
LEVEL 4	35,028 S.F.
LEVEL 3 STORAGE	26,201 S.F. (STORAGE)
LEVEL 2 GARAGE / OFFICE	939 S.F. (OFFICE)
	244 S.F. (ACCESSORY*)
	PARKING GARAGE (EXEMPT)
LEVEL 2 STORAGE	EXEMPT - BELOW GRADE
LEVEL 1	EXEMPT - BELOW GRADE
TOTAL (APPLICABLE)	97,440 S.F.

* ACCESSORY INCLUDES DISPLAY AREA, RESTROOMS & JC



LOCATION MAP

PROJECT NAME:
U-STOR-IT 

PROJECT ADDRESS:
11391 SORRENTO VALLEY RD. SAN DIEGO, CA. 92121

SCOPE OF WORK:
NEW SELF STORAGE FACILITY



KEY PLAN (NTS):

DATE:
2021.09.30 ISSUED FOR CDP REVIEW

REVISIONS:

2021.11.03	COMPLETENESS REVIEW REVISIONS
2022.03.07	CDP REVIEW REVISIONS
2022.07.12	CDP REVIEW REVISIONS
2022.09.26	CDP REVIEW REVISIONS
2022.12.13	CDP REVIEW REVISIONS

SHEET TITLE:
EXISTING LOT GFA & FAR BLDG. COVERAGE

PREPARED BY:
 **DDCA** architects
Direct Design Ltd.
Carroll Associates

PROJECT NO. 121152
PROJECT MGR. SHT
EXISTING LOT GFA / FAR
CDA-1.1
SHEET 1 OF 17

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