MITIGATED NEGATIVE DECLARATION

Project Name:	Eastlake Self Storage Project
Project Location:	West of State Route 125, south of Eastlake Drive, Chula Vista California 91910
Assessor's Parcel No.:	595-070-75-00
Project Applicant:	Midcity LLC c/o RQL Construction 364 Second Street, No. 5 Encinitas, California 92024 Contact: Stefan LaCasse 760.942.9991
Case No.:	IS 16-0004
Date of Draft Document:	September 16, 2019
Date of Final Document:	--

A. PROJECT SETTING

The proposed Eastlake Self Storage project (proposed project) is located within Eastlake Village in the City of Chula Vista, California (Figure 1, Regional Map). The site is positioned approximately 4.5 miles east of Interstate 805 (I-805), immediately west of State Route 125 (SR-125), south of Eastlake Drive, approximately 0.2 miles north of Otay Lakes Road, north of St. Germain Road, and east of Ridgewater Drive and the 120-foot San Diego Gas & Electric Company (SDG&E) easement (Figure 2, Vicinity Map). The site is located on Assessor's Parcel Number (APN) 595-070-75-00 and on the U.S. Geological Survey 7.5-minute Jamul Mountains quadrangle in Section 34 in Township 17 South, Range 1 West, 32°39′01.8″ north latitude and 116°58′20.46″ west longitude.

As shown on Figure 2, the site is within an urban portion of the City of Chula Vista (City) and in an area located directly between existing residential homes to the west, SR-125 to the east, Eastlake Drive to the north, a relatively small (less than 5-acre) vacant parcel located to the north beyond Eastlake Drive, and recreational tennis courts to the south. Additional residential and commercial land uses in the Otay Ranch area generally surround the project site.

The existing conditions observed on site suggest that the property has been previously disturbed and graded. The present site is vacant, with the exception of two structures, a pipe culvert outlet located in the northwestern portion, and an SDG&E utility transmission tower and associated lines that run approximately north–south along the western edge of the project site. The on-site topography is

relatively flat, but slightly sloping towards the center of the property with overall gradual sloping north to south. Elevations range from approximately 540 above mean sea level (amsl) in the southwestern portion up to approximately 588 feet amsl in the northeastern portion of the site.

The project site is currently designated as Open Space in the City of Chula Vista General Plan and is located within the Eastlake II Planned Community zoned as OS-3.

B. PROJECT DESCRIPTION

As shown on Figure 3, Site Plan, the SDG&E portion along the western portion of the 9.35-acre site would remain ungraded while the vacant portion to the east would be developed with approximately 1,200 self-storage units split between two buildings, each at three stories. The remainder of the site would comprise a decomposed granite surface for recreational vehicle (RV)/boat storage, parking areas, access roads, and drainage features.

The project site is currently designated under the Chula Vista General Plan as Open Space. The proposed project would also include amendments to the City of Chula Vista General Plan, Eastlake II General Development Plan (GDP), Sectional Plan Area (SPA), and Planned Community to reflect the land use designation from Open Space to a new land use, Business Center Warehouse-Storage District (BC-5). Under the GDP amendment, the new BC-5 land use district would be intended as an area for self-storage facilities which serve the surrounding neighborhoods and business districts. As discussed in the General Plan, General Development Plan, Supplemental Sectional Planning Area, and Planned Community Amendments (Hunsaker & Associates 2018), BC-5 would require a maximum building height of 35 feet, and a public street setback of 20 feet. With approval of these amendments, the project site would be in accordance with the Eastlake II Planned Community Guidelines and General Plan.

Building 1 is located on the northern portion of the site and would total 86,418 square feet across three stories. Building 2 is located south of Building 1, and north of the decomposed granite surface RV/boat storage. Building 2 would total 76,968 square feet across three stories for a total of 163,386 square feet among the two buildings. As shown on Figures 4 and 5 (Building 1 and Building 2 Elevations), both buildings would be approximately 35 feet in height. Exterior finishes on both buildings would be earth toned, consisting of tans, greys and greens. All exterior lighting would comply with the City's Municipal Code and would be shielded and directed downward.

Public Outreach

The Applicant and the City held a community meeting on May 15, 2017. Issues raised by the public at this meeting included: 1) concern over traffic generation; 2) concern over noise and dust; 3) concern over operation noise and security; 4) insufficient public noticing; 5) need for

additional self-storage facilities and 5) desire for the site to remain vacant. The concerns raised at this meeting have been addressed both within this environmental document, as well as other technical studies required as part of the processing of requested entitlements.

Utilities

The proposed project would include connections to existing utility infrastructure located beneath St. Germain Road and Eastlake Drive. Utilities would be underground and easements would be provided as necessary. The proposed project proposes water pipelines beneath the proposed driveway which would connect to existing pipelines beneath Eastlake Drive to the north and St. Germain Road to the south. Stormwater would be collected by a detention basin at the southern project boundary. Other surface flows would be directed to the proposed on-site storm drain towards the southern boundary of the project. The inlets on-site would be strategically located to collect site runoff and prevent street flooding. Trash enclosures would be dispersed throughout the site.

Project Access, Circulation and Parking

Project access is proposed solely to Eastlake Drive through an existing driveway. As part of the project, it is proposed that the existing center raised median on Eastlake Drive from Ridgewater Drive to the eastern edge of the project driveway be reconstructed with a median break to allow full access for most vehicles and left in and right out for large trucks. Additionally, the median east of the project driveway would be rebuilt to include a left turn pocket into the project driveway.

On-site roadways would be paved while the RV/boat storage area would have a decomposed granite surface. A sign(s) stating “Dead End” and/or “No Exit” would be placed for southbound travel adjacent to the RV/boat storage area to alert drivers that there is no exit south of the RV/boat Storage area. The on-site circulation would connect with the existing and gated access to St. Germain Road; however, this access would remain gated for powerline service and emergency vehicles only.

Additionally, there are approximately 0.58 acres of parking and recreational vehicle (RV) and boat storage at the southern portion to the site. The project would include 44 parking spaces surrounding the two buildings for storage facility vehicle access.

Landscaping

The proposed project would include 2.51 acres of landscaping. The landscape design would comply with the City of Chula Vista Landscape Water Conservation Ordinance of the Municipal Code. All landscaping would be maintained by the property owner. A variety of trees and shrubs

would line the project boundaries and detention area. The landscaped areas would not consist of water-intensive plant species.

Construction

For the purposes of analysis and modeling, it is anticipated that construction would commence in January 2020 and would last approximately 18 months, reaching completion by July 2021. The construction equipment mix and estimated hours of equipment operation per day of the project are shown in Table 1. For this analysis, it was assumed that heavy construction equipment would be used 5 days a week (22 days per month) during project construction. In addition to construction equipment operation, emissions from worker trips, hauling (i.e., dump trucks) and vendor trucks (i.e., delivery trucks) were estimated. Haul truck trips were assumed to be required during the grading, which would require the export of 19,343 cubic yards of soil. Vendor trucks transporting concrete, steel, and other building materials were assumed during the building construction, paving, and architectural coating phases.

Table 1
Construction Scenario Assumptions

Construction Phase	Daily Worker Trips	Daily Vendor Truck Trips	Total Haul Truck Trips	Equipment	Quantity	Usage Hours
Site preparation	18	0	0	Rubber-tired dozers	3	8
				Tractors/loaders/backhoes	4	8
Grading	16	0	2,418	Excavators	1	8
				Graders	1	8
				Tractors/loaders/backhoes	3	8
Building construction	218	86	0	Cranes	1	7
				Forklifts	3	8
				Welders	1	8
Paving	16	0	0	Pavers	2	8
				Paving equipment	2	8
				Rollers	2	8
Architectural coating	44	0	0	Air compressors	1	6

Operation

In developed conditions, the proposed infiltration basin would address peak flow detention, water quality, and hydromodification.

C. COMPLIANCE WITH ZONING AND PLANS

The project site is currently designated as Open Space in the City of Chula Vista General Plan and is located within a Planned Community zone, which may specifically establish on parcels of land which are suitable for, and of sufficient size to be planned and developed in a manner consistence with the City's Municipal Code. More specifically, the project site is zoned within the Eastlake II Planned Community, on parcel OS-3. The proposed project would also include amendments to the City of Chula Vista General Plan, Eastlake II General Development Plan (GDP), Sectional Plan Area (SPA), and Planned Community to reflect the land use designation from Open Space to a new land use, Business Center Warehouse-Storage District (BC-5). Under the GDP amendment, the new BC-5 land use district would be intended as an area for self-storage facilities which serve the surrounding neighborhoods and business districts. As discussed in the General Plan, General Development Plan, Supplemental Sectional Planning Area, and Planned Community Amendments (Hunsaker & Associates 2018), BC-5 would require a maximum building height of 35 feet, and a public street setback of 20 feet. With approval of these amendments, the project site would be in accordance with the Eastlake II Planned Community Guidelines and General Plan.

D. PUBLIC COMMENTS

Multiple comment letters were received by the City as a result of the Applicant and City held neighborhood meeting for the proposed self-storage project. Public comments contained concerns related to building elevations, impacts to views, traffic, and noise concerns.

E. IDENTIFICATION OF ENVIRONMENTAL EFFECTS

An Initial Study conducted by the City determined that the proposed project may have potential significant environmental impacts; however, mitigation measures have been incorporated into the project to reduce these impacts to a less than significant level. This MND has been prepared in accordance with Section 15070 of the CEQA Guidelines.

F. MITIGATION NECESSARY TO AVOID SIGNIFICANT IMPACTS

Biological Resources

A Biological Technical Report (BTR) was prepared for the proposed project. The direct loss of approximately 0.01-acres (345 linear feet) on-site and 0.001 acre (50 linear feet) off-site of natural flood channel (i.e., non-wetland WOUS) as a result of the project is considered significant and requires mitigation. Vegetation communities considered sensitive under the City Subarea Plan are those listed as Tier I through Tier III; rare to common uplands, respectively, and as well as wetlands. Therefore, project impacts to non-native grassland (Tier III), southern willow scrub, mulefat scrub,

and natural flood channel (Wetlands) are considered significant and require mitigation. Additionally, the direct loss of approximately 0.41 acre of riparian vegetation (southern willow scrub and disturbed southern willow scrub) on-site, and approximately 0.01 acre of riparian vegetation (mulefat scrub) off-site as a result of the project is considered significant and requires mitigation. Implementation of **MM-BIO-1** will reduce these impacts to a level below significant.

MM-BIO-1 The City requires that impacts to wetland be avoided to the maximum extent possible and where impacts are unavoidable, compensatory mitigation within the Chula Vista Subarea or Chula Vista Planning Area shall be required resulting in no overall net loss of wetlands. A total of up to 0.42 acres of wetlands within the project may be impacts within the development area.

Prior to issuance of land development permits, including clearing, grubbing, grading and/ or construction permits that impact jurisdictional waters, the project Applicant shall obtain all necessary permits from the ACOE, RWQCB, and CDFW, and shall mitigate direct impacts pursuant to the City's MSCP Subarea Plan and in accordance with the terms and conditions of all required permits. Areas under the jurisdictional authority of the ACOE, RWQCB, and CDFW shall be delineated on all grading plans.

The Applicant shall secure mitigation credits within a City-approved Conservation Bank within the City's MSCP Subarea Plan boundaries in accordance with the terms and conditions of all required permits. Verification of mitigation credit purchase by the Applicant to the City and Wetland Agencies is required prior to issuance of any land development permits.

If mitigation credits are not purchased, the Applicant must prepare a Wetlands Mitigation and Monitoring Plan to the satisfaction of the City, ACOE, RWQCB, and CDFW. The plan shall include, at a minimum, an implementation strategy; species salvage and relocation; appropriate seed mixtures and planting method; irrigation; quantitative and qualitative success criteria; maintenance, monitoring, and reporting program; estimated completion time; contingency measures; and identify a long-term funding source. The project Application shall also be required to implement the Wetlands Mitigation and Monitoring Plan subject to the oversight and approval of the Development Services Director (or their designee), ACOE, RWQCB, and CDFW.

Prior to issuance of land development permits, including clearing, grubbing, and grading permits for areas that impact jurisdictional waters, the project Applicant shall provide evidence that all required regulatory permits, such as those required under

Section 404 of the federal Clean Water Act, Section 1600 of the California Fish and Game Code, and the Porter Cologne Water Quality Act have been obtained.

As stated in the Initial Study, potential unexpected impacts (accidental encroachment) into sensitive vegetation and adjacent jurisdictional WOUS could occur, which would be considered potentially significant. Implementation of **MM-BIO-2** will reduce these impacts and potential unexpected impacts to a level below significance.

MM-BIO-2 Prior to issuance of land development permits, including clearing, grubbing, grading and/or construction permits, the Project Applicant shall install temporary construction fencing in accordance with Chula Vista Municipal Code (CVMC) 17.35.030 to avoid any unexpected accidental impacts (i.e., encroachment) into sensitive vegetation and/or jurisdictional waters. Prominently colored, well installed fencing and signage shall be in place to demarcate all approved access paths and construction work areas wherever the limits of grading are adjacent to sensitive vegetation communities or other biological resources, as identified by the qualified monitoring biologist. The limits of work, including the designated temporary off-site construction access, will be delineated with temporary construction fencing as appropriate, which will be installed prior to initiation of work activities.

Fencing shall remain in place during all construction activities. All temporary fencing shall be shown on grading plans for areas adjacent to the preserve and for all off-site facilities constructed within the preserve. Prior to release of grading and/or improvement bonds, a qualified biologist shall provide evidence that work was conducted as authorized under the approved land development permit and associated plans.

A pre-construction meeting should be held between all contractors and the qualified project biologist and during this meeting, the biologist will educate the contractors on sensitive habitat and project avoidance measures. All project personnel, shall provide written acknowledgement of their receiving avoidance training. This training shall include information on the location of the approved access paths and work areas, the necessity of preventing damage and impacts to sensitive habitat; and the discussion of work practices that will accomplish such. Lastly, the project biologist will be on-site to monitor all project activities within natural habitats.

If unauthorized impacts occur outside of the approved project boundary, the contractor shall notify the City Resident Engineer and project biologist immediately. The project biologist shall evaluate the additional impacts to determine the size of the impact and the vegetation communities, land covers and/or jurisdictional resources

impacted. The footprint of the impact shall be recorded with a GPS and the project biologist will report the impact(s) to City Staff as well as to the appropriate permitting agencies (where appropriate) for approval of the impact record and to establish any necessary follow-up mitigation measures. These measures may include development of an in-place Revegetation Plan for the identified impacts, including a 120-day plant establishment period and subsequent 25-month maintenance and monitoring period to ensure success of the revegetation effort.

Any unauthorized impacts to jurisdictional waters/wetlands would require reporting to the ACOE, CDFW, RWQCB, and the City as well as development of a Waters/Wetlands Restoration Plan to restore pre-impact conditions as directed by the agencies. The Revegetation Plan and/or Waters/Wetlands Restoration Plan shall include a description of the suitability of the restoration area, planting and irrigation plan, maintenance and monitoring requirements, and performance standards that ensures that the intended restoration is achieved. The plan(s) and associated monitoring reports shall be submitted to City staff.

As stated in the Initial Study, potentially significant impacts could occur to nesting birds in violation of the Federal Migratory Bird Treaty Act of 1918 and California Fish and Game Code 3505, if project construction occurs during general bird nesting season (i.e., February 15 through August 31 for most bird species). Implementation of **MM-BIO-3** and **MM-BIO-4** will reduce these impacts to a level below significant. **MM-BIO-4** will also reduce unexpected impacts (i.e., accidental encroachment) into sensitive vegetation beyond the proposed work areas and adjacent jurisdictional WOUS to levels less than significant.

MM-BIO-3 To avoid any direct impacts to nesting birds, construction activities should occur outside of the breeding season (February 15 to August 31). If construction activity is scheduled during the general bird breeding season, a qualified biologist shall conduct a pre-construction survey to determine the presence or absence of nesting bird species within the proposed work areas. The pre-construction survey shall be conducted within 4 calendar days prior to the start of construction activities. The Applicant shall submit the results of the pre-construction survey to City staff for review and approval prior to initiating any construction activities. If nesting birds are detected, a letter report or mitigation plan in conformance with the City's Biology Guidelines and applicable state and federal law (i.e., appropriate follow up surveys, monitoring schedules, construction and noise barriers/buffers) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. The report or mitigation plan shall be submitted to the City for review and approval and implemented to the satisfaction of

the City. The City Resident Engineer and/or project biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction. If nesting birds are not detected during the pre-construction survey, no further mitigation is required. Implementation of pre-construction surveys for nesting birds, and any required follow up protection measures, will reduce the potential impact levels to below significant.

As stated in the Initial Study, the proposed project would impact native upland vegetation communities and wetlands habitats, including non-native grassland and southern willow scrub. Implementation of **MM-BIO-4** will reduce these impacts to a level below significant.

MM-BIO-4 Prior to issuance of land development permits, including clearing, grubbing, grading, and/or construction permits, the project Applicant shall provide written confirmation that a City-approved biological monitor has been retained and shall be on site during clearing, grubbing, and/or grading activities. The biological monitor shall attend all preconstruction meetings and be present during the removal of any vegetation to ensure that the approved limits of disturbance are not exceeded and provide periodic monitoring of the impact area including, but not limited to, trenches, stockpiles, storage areas and protective fencing. The biological monitor shall be authorized to halt all associated project activities that may be in violation of the City's MSCP Subarea Plan and/or permits issued by any other agencies having jurisdictional authority over the project.

Before construction activities occur in areas containing sensitive biological resources, all workers shall be educated by a City-approved biologist to recognize and avoid those areas that have been marked as sensitive biological resources.

As stated in the Initial Study, project impacts to non-native grassland (Tier III), southern willow scrub, mulefat scrub, and natural flood channel (Wetlands) are considered significant and require mitigation. Implementation of **MM-BIO-1** and **MM-BIO-5** will reduce these impacts to a level below significant.

MM-BIO-5 A total of up to 6.24 acres of non-native grassland within the project may be impacted within the Development Area. Prior to the issuance of any land development permits that impact non-native grassland, including clearing, grubbing, grading, and/or construction permits, the Project Applicant shall mitigate direct impacts pursuant to the City's MSCP Subarea Plan consistent with the ratios listed in Table 5-3 of the Subarea Plan.

The Applicant shall secure mitigation credits within a City-approved Conservation Bank within the City's MSCP Subarea Plan boundaries. Verification of mitigation credit purchase by the Applicant to the City is required prior to issuance of any land development permits.

If mitigation credits are not purchased, the Applicant shall prepare a Habitat Mitigation and Monitoring Plan to the satisfaction of the City. The Habitat Mitigation and Monitoring Plan shall include, at a minimum, an implementation strategy; species salvage and relocation; appropriate seed mixtures and planting method; irrigation; quantitative and qualitative success criteria; maintenance, monitoring, and reporting program; estimated completion time; contingency measures; and identify a long-term funding source. The Project Applicant shall also be required to implement the Habitat Mitigation and Monitoring Plan subject to the oversight and approval of the Development Services Director (or their designee).

Unexpected impacts (i.e., accidental encroachment) into sensitive vegetation beyond the proposed work areas is considered significant. The Project will be required to obtain a HLIT permit, in accordance with the HLIT Ordinance, as described in **MM-BIO-6**, which will reduce those impacts to less than significant levels.

MM-BIO-6 Prior to issuance of any land development permits (including clearing, grubbing and/or grading permits), the project will be required to obtain a HLIT Permit pursuant to Section 17.35 of the Chula Vista Municipal Code for impacts to MSCP Tier II habitats and wetland resources.

Cultural Resources

As stated in the Initial Study, the proposed project may unexpectedly encounter previously unknown cultural resources during construction of the proposed project. Implementation of **MM-CUL-1** will reduce the potential for impacts to archaeological resources to less than significant.

MM-CUL-1 During ground-disturbing work (i.e., grading and excavation), spot-check monitoring by a qualified archaeologist shall be conducted in order to help identify any potential cultural resources that may be buried and aid in minimizing delays in construction.

In the event that cultural resources are unearthed during project excavation, all project construction activities within 200 feet of the discovery shall cease. The prime contractor shall immediately notify the City of Chula Vista (City). Upon notification of the discovery, the City shall retain a qualified archaeologist who

meets the Secretary of the Interior's Professional Qualification Standards to assess the potential significance of the discovery and propose appropriate mitigation per the California Environmental Quality Act (CEQA) or Section 106 of the National Historic Preservation Act. Work within 200 feet of the discovery shall not continue until the qualified archaeologist has completed the assessment of the discovery.

If human remains are encountered, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. The county Coroner shall be notified of the find immediately. If the remains are determined to be Native American, the County Coroner shall notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD). With the permission of the landowner, or their designee, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. The MLD may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

As stated in the Initial Study, the proposed project may unexpectedly encounter previously unknown paleontological resources during construction of the proposed project. Implementation of **MM-CUL-2** will reduce the potential for impacts to paleontological resources to less than significant.

MM-CUL-2 In the event that paleontological resources are unearthed during project excavation, the area of discovery shall be roped off with a 50-foot-radius buffer and the City shall be notified. A qualified paleontologist shall be retained to assess the find and provide appropriate mitigation. Once documentation and collection of the find is completed, the qualified paleontologist shall remove the rope and allow grading to recommence in the area of the find. The paleontologist shall prepare a paleontological resources impact mitigation program for the proposed project. The paleontological resources impact mitigation program shall be consistent with the guidelines of the Society of Vertebrate Paleontology.

Noise

As stated in the Initial Study, the proposed project would result in an increase in ambient noise levels associated with project construction. Temporary noise levels caused by project construction would be considered a potentially significant impact. Additionally, truck trips to and from the site associated with project construction pose a potential noise nuisance for the nearby residences. These construction noise levels associated with haul trucks and vendor delivery

trucks are also considered a potentially significant impact. Implementation of **MM-NOI-1** will reduce potentially significant construction-related noise impacts to a level below significance.

MM-NOI-1 The following noise measures shall be included in construction plans prior to the start of construction to the satisfaction of the City of Chula Vista:

- Construction equipment shall be properly outfitted and maintained with feasible noise-reduction devices to minimize construction-generated noise.
- Stationary noise sources such as generators or pumps shall be located as far away from noise-sensitive land uses as feasible.
- Laydown and construction vehicle staging areas shall be located as far away from noise-sensitive land uses as feasible.
- Whenever possible, residential areas that would be subject to construction noise or vibration shall be informed 1 week before the start of each construction phase.
- Electrically powered equipment shall be used instead of pneumatic or internal combustion powered equipment, where feasible.
- Construction site and access road speed limits shall be established and enforced during the construction period.
- The use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only.
- Construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow surrounding property owners to contact the job superintendent. The on-site construction supervisor shall have the responsibility and authority to receive and resolve noise complaints.
- Equipment shall not be left idling unless necessary.
- The project contractor shall, to the extent feasible, schedule construction activities to minimize the simultaneous operation of construction equipment so as to reduce noise levels resulting from operating several pieces of high-noise-level equipment at the same time.

G. AGREEMENT TO IMPLEMENT MITIGATION MEASURES

By signing the line(s) provided below, the Applicant and Operator stipulate that they have each read, understood and have their respective company's authority to and do agree to the mitigation measures contained herein, and will implement same to the satisfaction of the Environmental Review Coordinator. Failure to sign the line(s) provided below prior to posting of this Mitigated Negative Declaration with the County Clerk shall indicate the Applicant's and Operator's desire that the Project be held in abeyance without approval and that the Applicant and Operator shall apply for an Environmental Impact Report.

Stefan LaCasse, President	8/8/19
Printed Name and Title of Applicant	Date
	8/8/19
Signature of Applicant	Date

H. CONSULTATION

1. Individuals and Organizations

   City of Chula Vista:

   Others:

   Brian Grover, Dudek

2. Initial Study

This environmental determination is based on the City's Initial Study. The report reflects the independent judgment of the City of Chula Vista. Further information regarding the environmental review of this project is available from the Development Services Department, 276 Fourth Avenue, Chula Vista, California 91910.

Jeff Steichen Development Services Department	Date:

REFERENCES

Dudek. 2019a. Eastlake Self Storage Project Air Quality and Greenhouse Gas Emissions Assessment. April 23, 2019.

Dudek. 2019b. Biological Resources Technical Report for the Eastlake Self Storage Project. Revised April 2019.

Dudek. 2019c. Eastlake Self Storage Project Noise Impact Assessment. April 23, 2019.

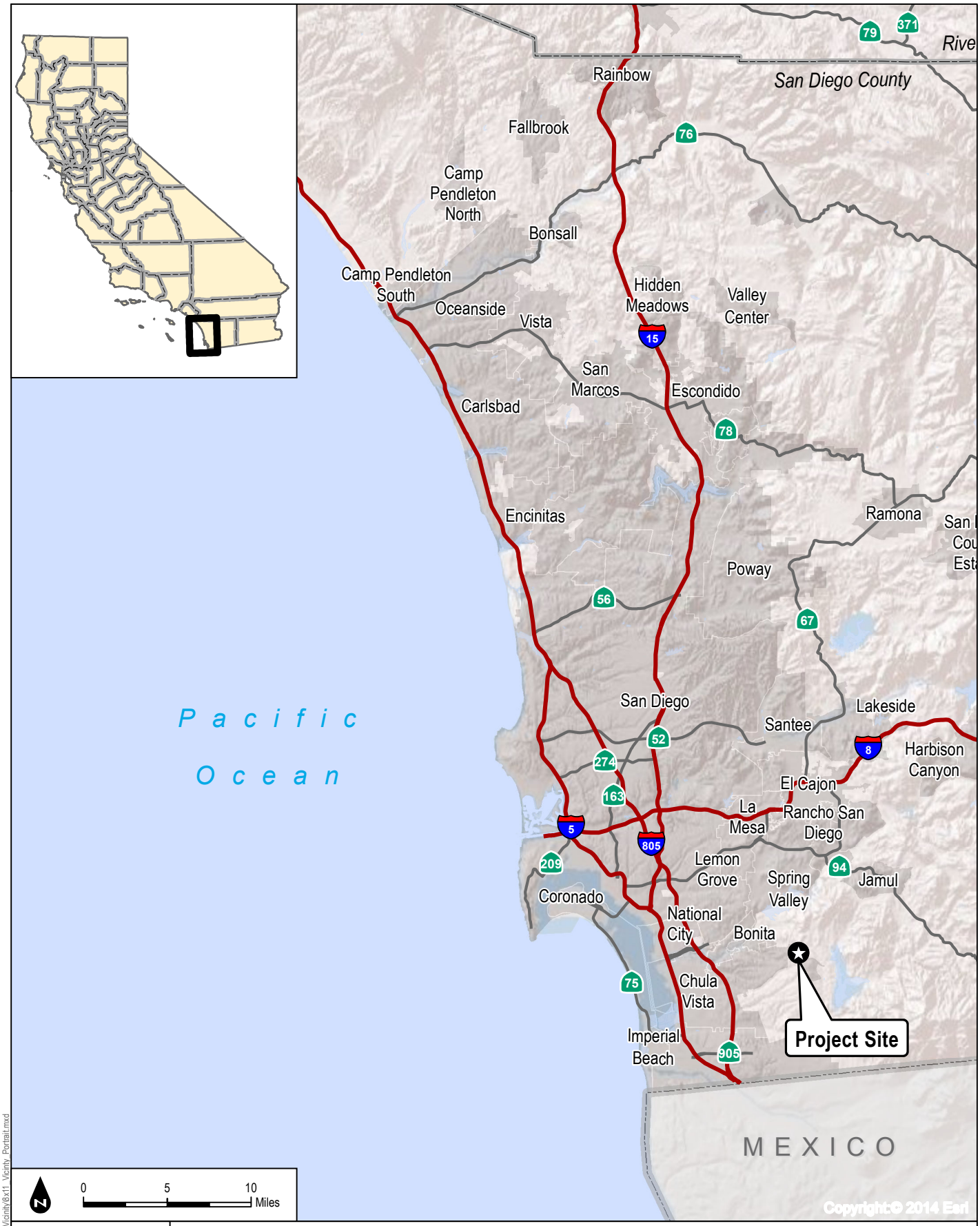

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FIGURE 1
Regional Map

Eastlake Self Storage MND

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SOURCE: BING AERIAL MAPPING SERVICE

FIGURE 2
Vicinity Map

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Eastlake Self Storage MND

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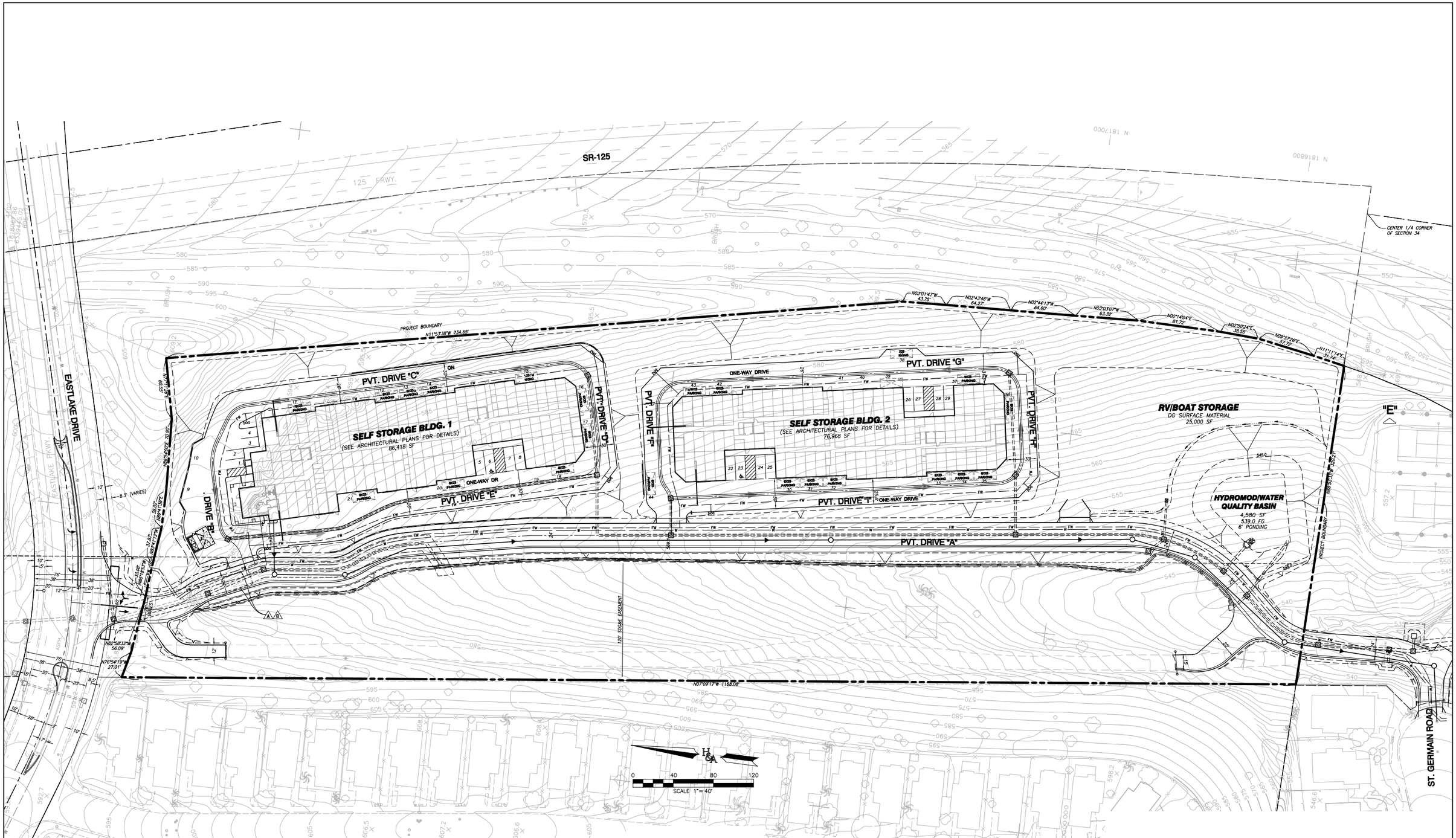

SOURCE: HUNSAKER & ASSOCIATES 2019

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FIGURE 3
Site Plan

Eastlake Self Storage MND

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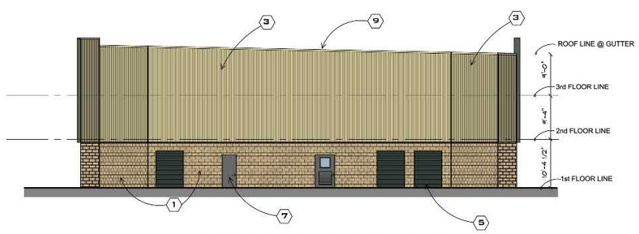
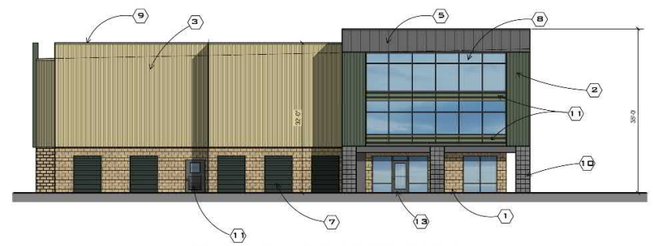
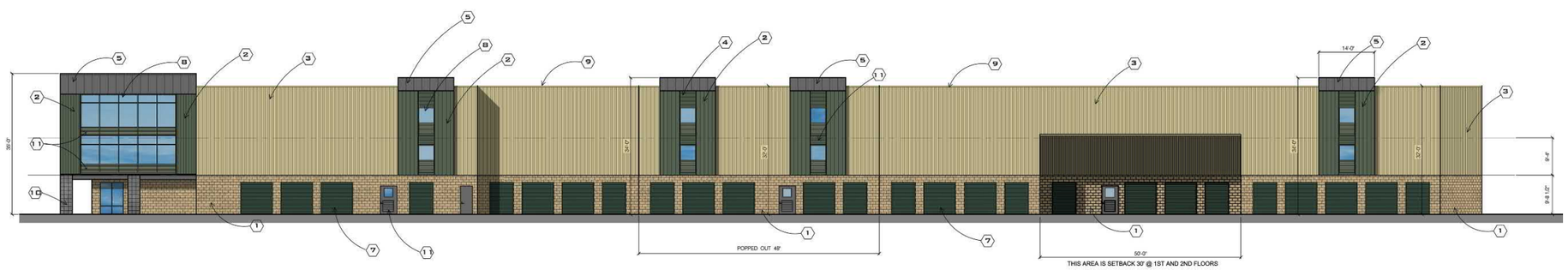
EAST ELEVATION
FREEWAY SIDE



SOUTH ELEVATION



NORTH ELEVATION



WEST ELEVATION
RESIDENTAIL SIDE

EXTERIOR ELEVATIONS

SOURCE: RMI ARCHITECTS 2018

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FIGURE 4
Building 1 Elevations

Eastlake Self Storage MND

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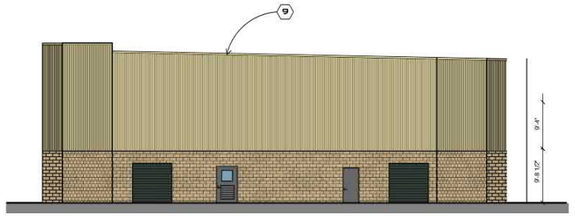
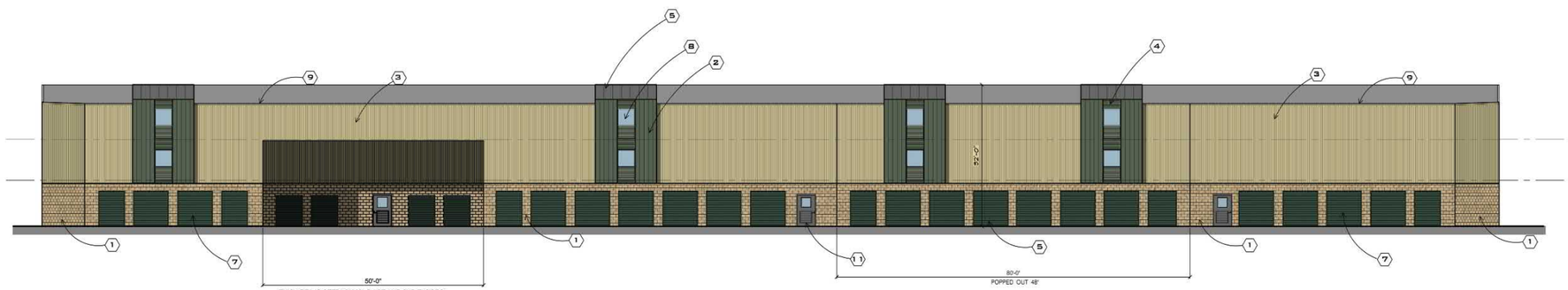
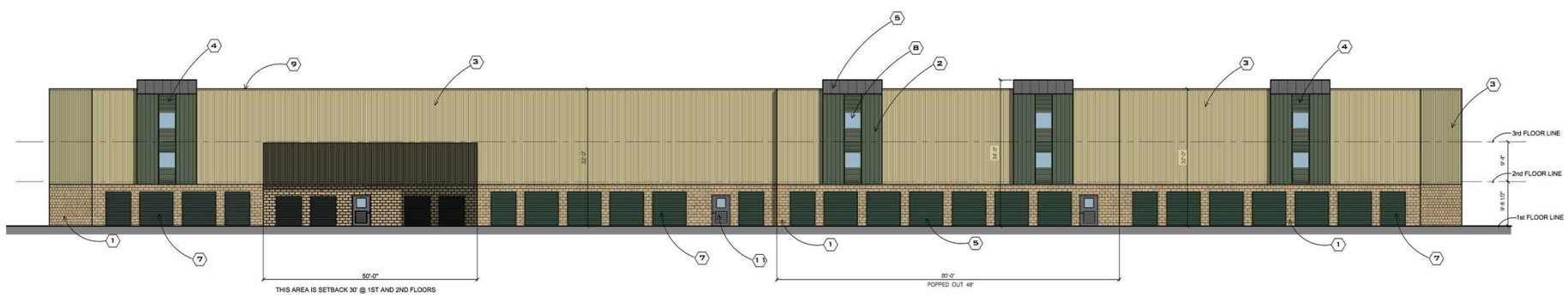


NORTH ELEVATION

SOUTH ELEVATION



EAST ELEVATION
FREEWAY SIDE



WEST ELEVATION
RESIDENTAIL SIDE

EXTERIOR ELEVATIONS

SOURCE: RMI ARCHITECTS 2018

DUDEK

FIGURE 5
Building 2 Elevations

Eastlake Self Storage MND

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EASTLAKE SELF STORAGE PROJECT
INITIAL STUDY

Environmental Checklist Form

1. Proponent Name, Address and Contact:	Midcity LLC c/o RQL Construction 364 Second Street, No. 5 Encinitas, California 92024 Contact: Stefan LaCasse 760.942.9991
2. Lead Agency Name, Address and Contact:	City of Chula Vista Development Services Department 276 Fourth Avenue Chula Vista, California 91910
3. Addresses and Phone Number of Proponent:	
4. Name of Proposal:	Eastlake Self Storage
5. Date of Checklist:	September 16, 2019
6. Case No.	IS 16-0004
7. General Plan Designation:	Open Space
8. Zoning Designation:	Planned Community **(**OS-3), Eastlake II Planned Community, Open Space
9. Project Description:	

PROJECT LOCATION AND SETTING

The proposed Eastlake Self Storage project (proposed project) is located within Eastlake Village in the City of Chula Vista, California (Figure 1, Regional Map). The site is positioned approximately 4.5 miles east of Interstate 805 (I-805), immediately west of State Route 125 (SR-125), south of Eastlake Drive, approximately 0.2 miles north of Otay Lakes Road, north of St. Germain Road, and east of Ridgewater Drive and the 120-foot San Diego Gas & Electric Company (SDG&E) easement (Figure 2, Vicinity Map). The site is located on Assessor's Parcel Number (APN) 595-070-75-00 and on the U.S. Geological Survey 7.5-minute Jamul Mountains quadrangle in Section 34 in Township 17 South, Range 1 West, 32°39′01.8″ north latitude and 116°58′20.46″ west longitude.

As shown on Figure 2, the site is within an urban portion of the City of Chula Vista (City) and in an area located directly between existing residential homes to the west, SR-125 to the east, Eastlake Drive to the north, a relatively small (less than 5-acre) vacant parcel located to the north beyond Eastlake Drive, and recreational tennis courts to the south. Additional residential and commercial land uses in the Otay Ranch area generally surround the project site.

The existing conditions observed on site suggest that the property has been previously disturbed and graded. The present site is vacant, with the exception of two structures, a pipe culvert outlet located in the northwestern portion, and an SDG&E utility transmission tower and associated lines that run approximately north–south along the western edge of the project site. The on-site topography is relatively flat, but slightly sloping towards the center of the property with overall gradual sloping north to south. Elevations range from approximately 540 above mean sea level (amsl) in the southwestern portion up to approximately 588 feet amsl in the northeastern portion of the site.

The project site is currently designated as Open Space in the City of Chula Vista General Plan and is located within a Planned Community zone, which may specifically establish on parcels of land which are suitable for, and of sufficient size to be planned and developed in a manner consistence with the City's Municipal Code. More specifically, the project site is zoned within the Eastlake II Planned Community, on parcel OS-3.

PROJECT DESCRIPTION

As shown on Figure 3, Site Plan, the SDG&E portion along the western portion of the 9.35-acre site would remain ungraded while the vacant portion to the east would be developed with approximately 1,200 self-storage units split between two buildings, each at three stories. The remainder of the site would comprise a decomposed granite surface for recreational vehicle (RV)/boat storage, parking areas, access roads, and drainage features. The land use summary for the project site is detailed in Table 1.

The proposed project would also include amendments to the City of Chula Vista General Plan, Eastlake II General Development Plan (GDP), Sectional Plan Area (SPA), and Planned Community to reflect the land use designation from Open Space to a new land use, Business Center Warehouse-Storage District (BC-5). Under the GDP amendment, the new BC-5 land use district would be intended as an area for self-storage facilities which serve the surrounding neighborhoods and business districts. As discussed in the *General Plan, General Development Plan, Supplemental Sectional Planning Area, and Planned Community Amendments* (Hunsaker & Associates 2018), BC-5 would require a maximum building height of 35 feet, and a public street setback of 20 feet.

Table 1
Project Site Development Summary

Site Use	Acreage
Buildings	1.24
Private driveways/parking	2.39
Recreational vehicle/boat storage	0.58
Landscaping	2.63
San Diego Gas & Electric Company (no development)	2.51
Total	**9.35**

Building 1 is located on the northern portion of the site and would total 86,418 square feet across three stories. Building 2 is located south of Building 1, and north of the decomposed granite surface RV/boat storage. Building 2 would total 76,968 square feet across three stories for a total of 163,386 square feet among the two buildings. As shown on Figures 4 and 5 (Building 1 and Building 2 Elevations), both buildings would be approximately 35 feet in height. Exterior finishes on both buildings would be earth toned, consisting of tans, greys and greens. All exterior lighting would comply with the City's Municipal Code and would be shielded and directed downward.

Utilities

The proposed project would include connections to existing utility infrastructure located beneath St. Germain Road and Eastlake Drive. Utilities would be underground and easements would be provided as necessary. The proposed project proposes water pipelines beneath the proposed driveway which would connect to existing pipelines beneath Eastlake Drive to the north and St. Germain Road to the south. Stormwater would be collected by a detention basin at the southern project boundary. Other surface flows would be directed to the proposed on-site storm drain towards the southern boundary of the project. The inlets on-site would be strategically located to collect site runoff and prevent street flooding. Trash enclosures would be dispersed throughout the site.

Project Access, Circulation and Parking

Project access is proposed solely to Eastlake Drive through an existing driveway. As part of the project, it is proposed that the existing center raised median on Eastlake Drive from Ridgewater Drive to the eastern edge of the project driveway be reconstructed with a median break to allow full access for most vehicles and left in and right out for large trucks. Additionally, the existing median east of the project driveway would be rebuilt to include a left turn pocket into the project driveway.

On-site roadways would be paved while the RV/boat storage area would have a decomposed granite surface. A sign(s) stating “Dead End” and/or “No Exit” would be placed for southbound travel adjacent to the RV/boat storage area to alert drivers that there is no exit south of the RV/boat Storage area. The on-site circulation would connect with the existing and gated access to St. Germain Road; however, this access would remain gated for powerline service and emergency vehicles only.

Additionally, there are approximately 0.58 acres of parking and recreational vehicle (RV) and boat storage at the southern portion to the site. The project would include 44 parking spaces surrounding the two buildings for storage facility vehicle access.

Landscaping

The proposed project would include 2.51 acres of landscaping. The landscape design would comply with the City of Chula Vista Landscape Water Conservation Ordinance of the Municipal Code. All landscaping would be maintained by the property owner. A variety of trees and shrubs would line the project boundaries and detention area. The landscaped areas would not consist of water-intensive plant species.

Construction

For the purposes of analysis and modeling, it is anticipated that construction would commence in January 2020 and would last approximately 18 months, reaching completion by July 2021. The construction equipment mix and estimated hours of equipment operation per day of the project are shown in Table 2. For this analysis, it was assumed that heavy construction equipment would be used 5 days a week (22 days per month) during project construction. In addition to construction equipment operation, emissions from worker trips, hauling (i.e., dump trucks) and vendor trucks (i.e., delivery trucks) were estimated. Haul truck trips were assumed to be required during the grading, which would require the export of 19,343 cubic yards of soil. Vendor trucks transporting concrete, steel, and other building materials were assumed during the building construction, paving, and architectural coating phases. Additional details regarding construction assumptions are provided in the modeling output provided in the Air Quality and Greenhouse Gas Calculations Memorandum (Dudek 2019a).

Table 2
Construction Scenario Assumptions

Construction Phase	Daily Worker Trips	Daily Vendor Truck Trips	Total Haul Truck Trips	Equipment	Quantity	Usage Hours
Site preparation	18	0	0	Rubber-tired dozers	3	8
				Tractors/loaders/backhoes	4	8
Grading	16	0	2,418	Excavators	1	8
				Graders	1	8
				Tractors/loaders/backhoes	3	8
Building construction	218	86	0	Cranes	1	7
				Forklifts	3	8
				Welders	1	8
Paving	16	0	0	Pavers	2	8
				Paving equipment	2	8
				Rollers	2	8
Architectural coating	44	0	0	Air compressors	1	6

Operation

The proposed project would have a maximum of two employees working on-site at any given time. In developed conditions, the proposed infiltration basin would address peak flow detention, water quality, and hydromodification.

ENVIRONMENTAL ANALYSIS QUESTIONS

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Comments:

(a) Less Than Significant Impact. Otay Lakes Road, located approximately 0.22 miles south of the project site, is designated as scenic roadway in the City of Chula Vista General Plan (City of Chula Vista 2005a). There are no scenic vistas on the project site, and the project site is not visible from Otay Lakes Road. The development of the proposed self-storage facility would be visually consistent with surrounding land uses, as the surrounding area is nearly completely built out with residential communities, shopping centers, other commercial, and roadway infrastructure. There are no designated scenic vistas on or surrounding the project site, and therefore the proposed project would not result in an adverse effect on a scenic vista. Impacts would be less than significant.

(b) Less Than Significant Impact. State scenic highways are designated by the California Department of Transportation (Caltrans) and are highways that maintain sensitive landscapes or valuable scenic resources within the highway viewshed. According to the Caltrans State

Scenic Highway Program Mapping System, 2 miles of State Route (SR-) 125 (from SR-94 to SR-8) is designated at a scenic highway, as it passes through attractive residential and commercial areas with Mt. Helix as the focal point. The portion of SR-125 that is designated as a scenic highway is located approximately 7.5 miles north of the project site. Although the portion of SR-125 that runs immediately adjacent to the project site to the east, is designated as an eligible state scenic highway under the Caltrans State Scenic Highway Program Mapping System, it has not been officially designated. The surrounding project area is almost completely built out. The project site is immediately surrounded by single-family residences to the west, Eastlake Drive to the north, SR-125 and off-ramp to the east and south, and shopping centers to the east, across SR-125. Additionally, there are no designated significant visual resources located on, or surrounding the project site. The proposed project is not within the viewshed of a designated scenic highway or roadway, and therefore impacts would be less than significant.

(c) Less Than Significant Impact. Construction of the proposed project would introduce the potential use of heavy machinery, such as large trucks, cranes, bulldozers, and other equipment needed for grading and construction activities. The presence of this equipment and the grading and construction activities associated with the proposed project would alter the visual character and quality of the site and would be visible from surrounding areas. However, the visual alteration as a result of project construction would be temporary in nature, and the proposed project would adhere to all applicable City regulations related to building and construction. Therefore, construction related impacts are determined to be less than significant.

The proposed project site is currently vacant, and has been previously disturbed. The project site is located in the vicinity of existing commercial uses located east of the SR-125 and adjacent to residential uses are located west of the site. The proposed project would result in the construction of two three-story private storage buildings, a private driveway, parking, RV and boat storage, and landscaping. The existing slope on the eastern portion of the project site would be graded to accommodate the building pad for the storage facility. The maximum exterior building height would be 32 feet. The graded pads for the proposed buildings would be approximately 35 feet lower than the existing finished grade for the existing residences to the west. As shown in Figure 4 and 5 (Building 1 and Building 2 Elevations), the proposed buildings would be made out of a variety of materials including concrete and metal, and a variety of colors including tan, grey, and neutral green hues. Figure 6, Conceptual Architectural Rendering 1, and Figure 7, Conceptual Architectural Rendering 2, provide visual renderings of the project to illustrate the potential modifications to the existing project area. Figure 6 provides a

visual of the proposed Building 1 under project conditions, facing southeast. Figure 7 illustrates both project buildings, facing northeast. Figure 7 shows the existing shopping center, east of the project, in the background. As shown in Figure 7, the proposed building's color scheme, bulk and scale would complement the color scheme, bulk and scale of the shopping center in the background.

The location of key observation points (KOP) from which to assess the anticipated aesthetic impacts of the proposed project were identified in consultation between the City and the project applicant, as shown on Figure 8, Key Observation Point Map. To accurately reflect the various viewer groups that would be potentially afforded views of the proposed project, KOPs consider multiple viewer groups in the surrounding area, with an emphasis on residential areas directly adjacent to the proposed project. The KOPs consider multiple viewing angles and distances. Six KOPs were selected to depict the anticipated visual changes to the landscape resulting from implementation of the proposed project. Existing photographs were taken and visual simulations depicting post-construction and proposed landscaping at both minimal and full maturity were prepared for each of the selected KOPs. Note that impacts under CEQA are considerate of public views, but not private views. However, several of the KOPs were selected to provide representative simulation of visual change from neighboring private property.

A comparison of the general location, view orientation, and viewer groups associated with each existing versus proposed KOP is provided herein. Additionally, photographs from key project area locations are used for visual simulations of the proposed project to illustrate the potential modifications to the existing project area.

Key Observation Point #1 – Eastlake Drive

As seen in Figure 9, Key Observation Point (KOP) 1 is the existing view from Eastlake Drive looking south/southwest towards the project site. The foreground of this view is comprised of Eastlake Drive, which runs in an east/west direction. Eastlake Drive is a one lane directional roadway with a bike lane on each side, and a center median divide between the lanes. South of the eastbound lane, a paved sidewalk is visible and includes a planter with existing low-lying landscaping which separates a portion of the sidewalk from the roadway. Beyond the sidewalk, existing vegetation and landscaping including dense green shrubs, some woodchip ground cover, and scattered juvenile trees cover the slightly elevated slope which makes up the buffer between the roadway and the project site. A chain link fence is visible to left of this KOP which separates the proposed project site from the vegetated buffer area immediately west of SR-125. Running from the foreground into the middle ground of this KOP, two separate overhead power lines are visible, one being a

lattice tower structure, and the other a wooden pole structure. These overhead power lines run between the project site and the single-family residences to the west, through an easement area. Interrupted views of the single-family residences to the right side of this KOP are afforded in the middle ground through a variety of tall trees, existing landscaping and a low-profile white fence that acts as a boundary line for the residences backyards. The residences are slightly elevated from the project site and consist of neutral earth toned hued stucco facades, brick colored roof tiles, and sliding windows in a variety of sizes, with little variation in building structure or articulation. From this existing view, the proposed building pad area is minimally visible due to the existing landscaping in the foreground. There are no focal points in this KOP that act as the background.

As seen in Figure 7, with implementation of the proposed project, the view from KOP 1 would only slightly change in comparison to existing conditions with the inclusion of interrupted views of the proposed storage facility in the middle ground. Only the upper story of the proposed structure is visible due to topography, existing landscaping and proposed trees. The proposed structures would be constructed out of a variety of materials including concrete and metal, and a variety of colors including tan, grey, and neutral green hues. Additionally, portions of the structure includes accent colors such as bronze. Existing residences in the foreground of this KOP would still be visible, however the proposed storage facility would block views of residences in the middle ground. Existing tall trees that shield the backyards of the residences would still be visible from this view, and the bulk and scale of the proposed storage facility would be compatible to the neighboring residences.

Key Observation Point #2 – Northwest Corner of Project Site

As seen in Figure 10, KOP 2 is the existing view from the power line easement corridor off of Eastlake Drive looking east/southeast to the northwest corner of the project site. The foreground of this KOP includes a disturbed entrance to the easement corridor with ground cover made up of dirt, wood chips, and dried grasses. Four small metal posts connected by a chain, and a short wood post fence separate this disturbed area from the easement trail, long grasses and the power line posts. Dense shrubs and tall grasses that cover the project site make up the middle ground. The chain link fence that separates the project site from the SR-125 right-of-way is also visible along the eastern boarder of the project site. Portions of the rooftops of the existing shopping center located immediately east of SR-125 are visible from this KOP. The background from this view is made up of the distant, dark tree line that makes up the horizon line. There are no prominent background views.

As seen in Figure 10, with implementation of the proposed project, the view from KOP 2 would change. While the SDG&E easement would remain the same; however, the middle ground would be completely built out with an asphalt entrance/exit and storage access roads, roadside landscaping with low-lying shrubs and a variety of trees, and the three-story storage facility structures. As described above, the exterior finishes on both buildings would be earth toned, consisting of tans, greys and neutral greens. The northern building and proposed trees block views of the shopping center east of SR-125, except for the top portion of the tower structure/monument in the northern portion of this view. Additionally, this northern building blocks majority of the horizon line, except for a small portion visible beyond the southern building on-site.

Key Observation Point #3 – Western Residences #1

Figure 11 represents a private view of the central portion of the project site from the backyard of a residence on Ridgewater Drive. The foreground and middle ground of this KOP consist of bright green grasses, scattered small brown dry shrubs, and larger dense green shrubs. The topography of the project site is such that the center of the site sits at the lowest elevation and gently slopes up to the residential area to the west and the SR-125 right-of-way to the east. Due to the elevated topography to the east, SR-125 is not visible from this KOP; however, uninterrupted views of the facades of stores in the shopping center immediately east of SR-125 are afforded, as well as some associated parking area and signage. The background from this view is comprised of distant tree lines that fade with distance and create the horizon line just above the rooftops of the shopping center. There are no prominent background views from this KOP.

As seen in Figure 11, implementation of the proposed project would change the view from this KOP from its undeveloped state, with two three-story storage facility buildings, associated access roads, parking, gated entrances, and associated landscaping. The foreground from this KOP would remain the same as the existing condition (SDG&E easement), and development would occur within the middle ground. As previously described, the exterior finishes on both buildings would be earth toned, consisting of tans, greys, and greens. Proposed landscaping throughout the development would include low-lying green ground cover, small shrubs, and scattered trees throughout, compatible with existing vegetation in the foreground. The mass and scale of the proposed buildings would complement with the existing shopping center backing the project site, as roofline of the proposed project would visibly be in line with the roofline of the existing shopping center. Rooflines and portions of the facades of shopping center stores would still be visible past the proposed buildings. Implementation of the proposed project would not block any views of the horizon line.

Key Observation Point #4 – Southwest Corner of Project Site

Figure 12 represents the existing view from the SDG&E easement at the southwest corner of the project site, looking northeast to the project site. The foreground in this KOP is made up of low-lying bright green grasses, scattered low-lying shrubs, and a large dense shrub. A narrow dirt access road, which acts as the easement access bisects the low-lying vegetation in the foreground and runs directly under the wooden post power line structure into the middle ground, disappearing behind existing dense vegetation and elevated topography. The lattice tower structure power lines run parallel to the wooden structure, immediately east. The power line structures are in the middle ground, and overhead power lines run from the foreground (overhead) to the background and out of sight. Immediately east of the power line structures, in the middle ground is covered in vegetation, similar to that of the foreground, including bring green grasses, low lying shrubs, mustard weed, and a stand along palm tree. The topography of the middle ground is relatively flat, sloping slightly upward towards the eastern boarder of the project site, meeting the faintly visible chain link fence which separates the project site from the SR-125 right-of-way. The top of the off-white, clay colored roof, tower structure in the shopping center across SR-125 is visible from this point, along with the tops of mature trees on the east side of the chain link fence. The background of this KOP is made up of two distant, faint, and dark mountain tops, which barely surpass the shopping center tower roofline and scattered tree line in the distant middle ground. No other background views are afforded from this KOP.

As seen in Figure 12, the view from KOP 4 would change with implementation of the proposed project from an undeveloped site to a developed site with associated hardscape, landscape, gated entry/exits, and storage facility buildings. Majority of the foreground in this KOP would remain untouched; however, a paved access road for SDG&E easement corridor access would be introduced here, wrapping around from the project site entrance (not visible in this KOP) past the two storage buildings to meet the existing narrow dirt path described in the existing conditions above. The paved access road would dead end to meet the dirt trail with swinging metal gate posts, prohibiting public access to the easement corridor. Both power line tower structures would remain in place, and some existing vegetation alongside the lattice structure tower to the east would remain. The middle ground would be transformed with landscaping on either side of the access road, including vegetated groundcover, low-lying shrubs, and a variety of low-profile trees which shield direct views of the storage facility from this view. Indirect views of the dark grey storage garage doors and tan façade on the bottom floor, as well the light grey colored top stories of both buildings are afforded through the proposed landscaping. A low-profile black metal

gate that runs along the perimeter of the storage buildings for security purposes is also visible from this view. Introduction of the proposed storage facility buildings, although not immense in mass and scale, would partially block views of the background from this KOP.

Key Observation Point #5 – Western Residences #2

Figure 13 represents the existing private view of the southern end of the project site from the backyards of the southernmost residences on Ridgewater Drive. As previously described, the residences on Ridgewater Drive sit at a higher elevation than the project site. The topography in the foreground of this view slopes gently downward to meet the narrow dirt trail which acts as the SDG&E easement corridor. The foreground here is covered in dried grasses, and scattered green shrubs. Power lines cross the entirety of this view, left to right, through the central and upper portion of this KOP. The middle ground is covered in green and brown grasses, dark green and brown low-lying shrubs, and one large dense shrub to the right side of this view. The topography of the middle ground is relatively flat past the dirt easement corridor, and then gradually slopes upward to meet the chain link fence line separating the project site from the SR-125 right-of-way. A portion of SR-125 is visible from this point. From this elevated view point, large portions of the shopping center area east of SR-125 are visible. The facades of stores within the shopping center are painted in neutral colors such as tans, browns, off-whites and clay-colored rooftops. These buildings also include accent and signage colors such as blues, greens, and red. Associated shopping center parking and landscaping is also visible from this point. A mixture of dark tree lines and shadowed buildings make up the horizon line of this KOP. An outline of a mountain range, acts as the background focal point.

Figure 13 depicts the view from KOP 5 with implementation of the proposed project. The foreground in this KOP would remain the same, except for the incorporation of the paved roadway in the bottom left corner of this visual that meets the narrow dirt easement corridor. Moving into the middle ground, majority of the relatively flat portion of the middle ground would also remain undeveloped, before transitioning into a proposed landscaped slope leading up to the paved access road. This outdoor storage area is a gated, dirt lot, surrounded by proposed landscaping to the right (south), and the south storage building to the left (north). A variety of large RVs, boats, campers, and shuttles are depicted in the outdoor storage area. The security gate is a black metal gate that runs parallel to the paved access road. The proposed landscaping surrounding the storage facilities, both outdoor and indoor, include a variety of trees that shield direct views of the facility. The south end of the southern storage facility building is visible from this KOP; as described previously, the storage building facades are tan in color on the bottom floor with dark grey storage garage doors and light grey colored façades on the second

and third stories. The existing slope on the eastern portion of the project site would be graded to accommodate the building pad for the storage facility. Views past the project site of SR-125 and the existing shopping center would remain similar to existing conditions. Implementation of the proposed project would not block any views of the horizon line or the mountain backdrop.

Key Observation Point #6 –State Route 125

Figure 14 depicts the existing view for motorists traveling northbound on SR-125, looking northwest towards the project site. In this KOP, the foreground consists of a dirt and green grass covered freeway median, the asphalt paved southbound State Route 125, and a slightly elevated, vegetated slope with a chain link fence along the top. The topography of this slope blocks all views of the project site from this KOP. The Eastlake Parkway Bridge is visible to the right side of this KOP. The middle ground consists of a variety of existing tall trees, indirect views of the back facades of some residences of Ridgewater Drive, distant street light poles, and a lattice power line structure, connecting power lines from north to south across this KOP. There are no prominent features that act as the background for this KOP.

Figure 14 depicts the view from northbound SR-125 looking northwest to the project site at project buildout. Proposed views from this KOP would remain very similar to existing conditions in the foreground and middle ground. However, from this point, the viewer would be able to see the top story of the northern storage facility building. The top story of the tan storage façade and a small portion of the gray office façade would be visible from this point. The proposed structure does not surpass the roofline of the existing visible residences that back the project site, nor the existing tree line. As previously described, the elevated slope immediately off the southbound SR-125 shoulder would block majority of the proposed project from this view.

Conclusion

As described and shown in the KOPs above, the most prominent views of the project site would be from the residents to the west (however, it should be noted that the majority of these views are considered private). As shown, due to topography and siting, the mass and scale of the proposed buildings would complement with the existing shopping center located approximately 350 feet east of the project site, and the roofline of the proposed project would generally not visibly surpass the roofline of the shopping center. Implementation of the proposed project would partially block background views. Additionally, portions of the structure includes mild accent colors such as spruce green storage doors. Implementation of

the proposed project would change the views towards the project site substantially from an undeveloped site to developed, with two three-story storage facility buildings, associated access roads, parking, gated entrances, and associated landscaping.

The siting, elevation, and setback of the buildings relative to the surrounding area would reduce the apparent size, bulk, and scale of the structures. Therefore, visual character of the proposed project would blend in with the overall built-out nature of the surrounding area. Additionally, the proposed project would be required to comply with all applicable design guidelines enforced by the City for the Eastlake II Planned Community. While the proposed project would result in a visual change from the existing condition, it would not substantially degrade the existing visual quality of the site and the surroundings. Therefore, impacts to the visual character or quality of the project site and its surroundings would be considered less than significant.

(d) Less Than Significant Impact. As previously discussed, the proposed project would be required to comply with all applicable design guidelines enforced by the City. These include measures applicable to exterior lighting to ensure that all lighting would conform to City standards or a City-approved theme lighting program. The proposed project would incorporate exterior lighting for nighttime security that would be shielded to direct the light downward. Conformance with applicable City standards would ensure that impacts due to lighting and glare would be less than significant.

Mitigation: No mitigation measures are required.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURAL RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:				
a) 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?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Comments:

(a) No Impact. The project site is vacant, has been previously graded, and is currently designated as Open Space. Under the California Department of Conservation Farmland Mapping and Monitoring Program, the project site is designated as urban and built-up land (CDOC 2014). Additionally, the project site is not designated under a City of Chula Vista or County of San Diego Agricultural Zone (City of Chula Vista 2005b). Implementation of the proposed project would not convert any existing farmland to a non-agriculture use; therefore, no impacts to farmland would occur as a result of the project.

(b) No Impact. As stated above, the project site is not zoned for agricultural use and is not subject to a Williamson Act contract. Additionally, there is no existing or designated agricultural land uses in the surrounding area. Therefore, no impacts would occur.

(c) No Impact. Forest land is defined as "land that can support 10% native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits" (California Public Resources Code, Section 12220(g)). Timberland is defined as "land, other than land owned by the federal government and land designated by the board as experimental forestland, which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees" (California Public Resources Code, Section 4526). A Timberland Production Zone is defined as "an area which has been zoned pursuant to Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, as defined in subdivision" (California Government Code, Section 51104(g)).

The project site has been previously graded, and is currently designated as open space. The surrounding area is almost entirely built out, and there are no designated forest land, timberland, or timberland production zones within the project site vicinity. Implementation of the proposed project would not result in conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland production. Therefore, no impacts would result.

(d) No Impact. As discussed above, the project site has been previously graded, and no designated forest land exists on the project site. Therefore, no impacts to forest land or conversion of forest land to non-forest use would occur as a result of the project.

(e) No Impact. As described within the response to the previous thresholds, no portion of the project site is located within or adjacent to existing Prime, Unique, or Important agricultural areas, and project implementation would not result in the conversion of farmland to non-agricultural use. Additionally, no portion of the project site is located within or adjacent to forest land, timberland, or a Timberland Production Zone, and project implementation would not result in the conversion of forest land to non-forest use. Therefore, no impacts would occur.

Mitigation: No mitigation measures are required.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

Comments:

An Air Quality and Greenhouse Gas Emissions Assessment prepared by Dudek for the proposed project is included in reference herein. The analysis contained in this section is based on the findings of the Air Quality and Greenhouse Gas Emissions Assessment (Dudek 2019a). In addition, a Traffic Analysis Letter was prepared by LOS Engineering, Inc. in March 2019 (LOS Engineering 2019), which provides project trip generation rates that were used in the air quality and greenhouse gas analysis.

(a) Less Than Significant Impact. The San Diego Air Pollution Control District (SDAPCD) and San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plans for attainment and maintenance of the ambient air quality standards in the San Diego Air Basin (SDAB)—specifically, the State Implementation Plan (SIP) and the Regional Air Quality Strategy (RAQS).[1] The federal ozone (O_3) maintenance plan, which is part of the SIP, was adopted in 2012. The SIP includes a demonstration that current strategies and tactics will maintain acceptable air quality in the SDAB based on the National Ambient Air Quality Standards (NAAQS). The RAQS was initially adopted in 1991 and is updated every 3 years (most recently in 2016). The RAQS outlines SDAPCD's plans and control measures both adopted since 2009 and scheduled for review over the next three years, which are designed to attain the state air quality standards for O_3. Additionally, the RAQS update includes a detailed reassessment and affirmation of the SDCAPCD previous findings that state emission offset requirements are not necessary for the County to achieve and maintain the state ozone standards. The SIP and RAQS rely on information from California Air Resources Board (CARB) and SANDAG, including mobile and area source emissions as well as information regarding projected growth in the San Diego County as a whole and the cities within the County, to project future emissions and determine the strategies necessary for the reduction of emissions through regulatory controls.

The SIP and RAQS rely on information from the CARB and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in the County and the cities in the County, to project future emissions and to determine from them the strategies necessary for the reduction of emissions and to determine from them the strategies necessary for the reduction of emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by the County and the cities in the County as part of the development of their general plans.

If a project proposes development that is greater than that anticipated in the local plan and SANDAG's growth projections, the project might be in conflict with the SIP and RAQS and may contribute to a potentially significant cumulative impact on air quality.

The project site is currently designated as Open Space within the City's General Plan. The project would require a general plan amendment which will add a new Business Center Land Use District with a designation of Warehouse-Storage District (BC-5).

[1] For the purpose of this discussion, the relevant federal air quality plan is the O_3 maintenance plan (SDAPCD 2012). The RAQS is the applicable plan for purposes of state air quality planning. Both plans reflect growth projections in the SDAB.

The BC-5 land use designation would allow for open space and self-storage land uses. Therefore, the project would not conflict with the land use designation for the project site after inclusion of a General Plan amendment. Notably, the project does not include development that will induce population growth to the region that would be unaccounted for in the underlying growth estimates for the basin used as the basis for the RAQS. As such the project would not conflict with or obstruct implementation of the RAQS (Dudek 2019a).

Furthermore, as discussed below, operational emissions would be substantially lower than the City's recommended significance thresholds. Therefore, at a regional level, the project would be consistent with the underlying growth forecasts in the RAQS. Impacts would be less than significant.

(b) Less Than Significant Impact.

Construction Emissions

It is anticipated that construction would commence in January 2020 and would last approximately 18 months, reaching completion by July 2021. Construction of the project would result in a temporary addition of pollutants to the local airshed caused by soil disturbance, fugitive dust emissions, and combustion pollutants from on-site construction equipment and from off-site employee vehicles and haul trucks. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation, and for dust, the prevailing weather conditions.

The project would generate construction-related air pollutant emissions from construction activities such as the following: entrained dust, off-road equipment, vehicle emissions, and architectural coatings. Entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, resulting in coarse particulate matter (PM_{10}; particulate matter less than or equal to 10 microns in diameter) and fine particulate matter ($PM_{2.5}$; particulate matter less than or equal to 2.5 microns in diameter) emissions. The project is subject to SDAPCD Rule 55, Fugitive Dust Control. This rule requires that the project take steps to restrict visible emissions of fugitive dust beyond the property line. Compliance with Rule 55 would limit fugitive dust (PM_{10} and $PM_{2.5}$) that may be generated during grading and construction activities. To account for dust control measures in the calculations, it was assumed that the active sites would be watered at least twice daily.

Exhaust from internal combustion engines used by construction off-road equipment and on-road vehicles would result in emissions of oxides of nitrogen (NO_x), volatile organic compounds (VOCs), carbon monoxide (CO), sulfur oxides (SO_x), PM_{10}, and $PM_{2.5}$. The application of architectural coatings, such as exterior/interior paint and other finishes, would also produce VOC emissions; however, the contractor is required to procure architectural coatings from a supplier in compliance with the requirements of SDAPCD Rule 67.0.1, Architectural Coatings. This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories (Dudek 2019a).

Table 3 shows the estimated maximum daily construction emissions associated with the construction of the project. Complete details of the emissions calculations are provided in the Air Quality and Greenhouse Gas Emissions Assessment Memorandum (Dudek 2019a). Construction of the project is anticipated to commence in January 2020 and would last approximately 18 months, reaching completion by mid-2021. As shown in Table 3, daily construction emissions would not exceed the City's recommended significance thresholds for VOCs, NO_x, CO, SO_x, PM_{10}, or $PM_{2.5}$; therefore, impacts during construction would be less than significant.

Table 3
Estimated Maximum Daily Construction Emissions

Construction Year	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	pounds per day					
2020	4.15	60.48	25.50	0.13	10.48	6.53
2021	48.05	26.72	24.59	0.07	3.36	1.57
Maximum Daily Emissions	**48.05**	**60.48**	**25.50**	**0.13**	**10.48**	**6.53**
Emission Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: See Air Quality and Greenhouse Gas Emissions Assessment Memorandum (Dudek 2019a) for detailed results
Notes: The values shown are the maximum summer or winter daily emissions results from CalEEMod.
These estimates reflect control of fugitive dust required by SDAPCD Rule 55 and compliance with SDAPCD Rule 67 which limits VOC content of architectural coatings.
VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SOx = oxides of sulfur; PM_{10} = particulate matter with an aerodynamic diameter equal to or less than 10 microns; $PM_{2.5}$ = particulate matter with an aerodynamic diameter equal to or less than 2.5 microns.

Operational Emissions

Following the completion of construction activities, the project would generate VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ emissions from mobile and stationary sources, including vehicular traffic and area sources (water heating and landscaping).

Table 4 presents the maximum daily emissions associated with the operation of the project. The values shown are the maximum summer or winter daily emissions results from the California Emissions Estimator Model (CalEEMod). As shown in Table 4, the combined daily area, energy, and mobile source emissions would not exceed the City's recommended operational thresholds for VOCs, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$. Impacts associated with project-generated operational criteria air pollutant emissions would be less than significant.

Table 4
Estimated Maximum Daily Operational Criteria Air Pollutant Emissions

	VOC	CO	NO_x	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per Day					
Area	3.73	<0.01	0.02	0.00	<0.01	<0.01
Energy	0.01	0.06	0.05	<0.01	<0.01	<0.01
Mobile	0.53	2.24	6.29	0.02	1.98	0.54
Total Daily Emissions	**4.27**	**2.30**	**6.36**	**0.02**	**1.98**	**0.54**
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	No	No	No	No	No	No

Source: See Air Quality and Greenhouse Gas Emissions Assessment Memorandum (Dudek 2019a) for detailed results.
Notes: The values shown are the maximum summer or winter daily emissions results from CalEEMod.
These estimates reflect compliance with SDAPCD Rule 67, which limits VOC content of architectural coatings and adjustments to the trip generation rates as provided in the traffic analysis (LOS Engineering 2019).
VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = oxides of sulfur; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter.

(c) Less Than Significant Impact. In analyzing cumulative impacts from the project, the analysis must specifically evaluate a project's contribution to the cumulative increase in pollutants for which the SDAB is designated as nonattainment for the California Ambient Air Quality Standards (CAAQS) and NAAQS. If the project does not exceed thresholds and is determined to have less-than-significant project-specific impacts, it may still contribute to a significant cumulative impact on air quality if the emissions from the project, in combination with the emissions from other proposed or reasonably foreseeable future projects, are in excess of established thresholds. However, the project would only be considered to have a significant cumulative impact if the project's contribution accounts for a significant proportion of the cumulative total emissions (i.e., it represents a "cumulatively considerable contribution" to the cumulative air quality impact; Dudek 2019a).

Additionally, for the SDAB, the RAQS serves as the long-term regional air quality planning document for the purpose of assessing cumulative operational emissions in the basin to ensure the SDAB continues to make progress toward NAAQS and CAAQS attainment status. As such, cumulative projects located in the San Diego region would have the potential to result in a cumulative impact to air quality if, in combination, they

would conflict with or obstruct implementation of the RAQS. Similarly, individual projects that are inconsistent with the regional planning documents upon which the RAQS is based would have the potential to result in cumulative operational impacts if they represent development and population increases beyond regional projections.

The SDAB has been designated as a federal nonattainment area for O_3 and a state nonattainment area for O_3, PM_{10}, and $PM_{2.5}$. The nonattainment status is the result of cumulative emissions from all sources of these air pollutants and their precursors within the SDAB. As discussed previously, the emissions of all criteria pollutants would be below the significance levels. Construction would be short term and temporary in nature. Once construction is completed, construction-related emissions would cease. Operational emissions generated by the project would be minimal and would not exceed the significance thresholds for VOCs, NO_x, CO, SO_x, PM_{10}, or $PM_{2.5}$. Regarding long-term cumulative operational emissions in relation to consistency with local air quality plans, as discussed above, the project would not result in significant regional growth that is not accounted for within the RAQS. Therefore, the project would be consistent with the underlying growth forecasts in the SIP and RAQS. In summary, the project would not result in a cumulatively considerable contribution to regional O_3 concentrations or other criteria pollutant emissions. Cumulative impacts would be less than significant.

(d) Less Than Significant Impact. Air quality varies as a direct function of the amount of pollutants emitted into the atmosphere, the size and topography of the air basin, and the prevailing meteorological conditions. Air quality problems arise when the rate of pollutant emissions exceeds the rate of dispersion. Reduced visibility, eye irritation, and adverse health impacts upon those persons termed “sensitive receptors” are the most serious hazards of existing air quality conditions in the area. Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. People most likely to be affected by air pollution, as identified by CARB, include children, the elderly, athletes, and people with cardiovascular and chronic respiratory diseases. As such, sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes. The closest off-site sensitive receptors to the project are residential land uses to the west and are located within approximately 75 feet of the project boundary (Dudek 2019a).

In addition to impacts from criteria pollutants, project impacts may include emissions of pollutants identified by the state and federal government as toxic air contaminants (TACs) or hazardous pollutants. State law has established the framework for California's TAC identification and control program, which is generally more stringent than the federal program and aimed at TACs, including the federal hazardous air pollutants, and is adopting appropriate control measures for sources of these TACs. The greatest potential for TAC emissions during construction would be diesel particulate emissions from heavy equipment operations and heavy-duty trucks and the associated health impacts to sensitive receptors. The following measures are required by state law to reduce diesel particulate emissions:

- Fleet owners of mobile construction equipment are subject to the CARB Regulation for In-use Off-road Diesel Vehicles (Title 13 California Code of Regulations, Chapter 9, Section 2449), the purpose of which is to reduce diesel particulate matter (DPM) and criteria pollutant emissions from in-use (existing) off-road diesel-fueled vehicles.
- All commercial diesel vehicles are subject to Title 13, Section 2485 of the California Code of Regulations, limiting engine idling time. Idling of heavy-duty diesel construction equipment and trucks during loading and unloading shall be limited to five minutes; electric auxiliary power units should be used whenever possible.

Health effects from carcinogenic air toxics are usually described in terms of cancer risk. The SDAPCD recommends an incremental cancer risk threshold of 10 in a million (SDAPCD 2014). "Incremental cancer risk" is the net increased likelihood that a person continuously exposed to concentrations of TACs resulting from a project over a 9-, 30-, and 70-year exposure period will contract cancer based on the use of standard Office of Environmental Health Hazard Assessment (OEHHA) risk-assessment methodology. The project would not require the extensive use of heavy-duty construction equipment, which is subject to a CARB Airborne Toxics Control Measure for in-use diesel construction equipment to reduce diesel particulate emissions, and would not involve extensive use of the diesel trucks, which are also subject to a CARB Airborne Toxics Control Measure.

Total construction of the project would last approximately 18 months, after which project-related toxic air contaminant (TAC) emissions would cease. Thus, the project would not result in a long-term (i.e., 9-year, 30-year, or 70-year) source of TAC emissions. No residual TAC emissions and corresponding cancer risk are anticipated after construction, and no long-term sources of TAC emissions are anticipated during operation of the project. Therefore, the exposure of sensitive receptors to TAC emissions would result in a less than significant impact.

Mobile-source impacts, including those related to CO, occur essentially on two scales of motion. Regionally, project-related construction travel would add to regional trip generation and increase the vehicle miles traveled (VMT) within the SDAB. Locally, construction traffic would be added to the roadway system in the vicinity of the project site. Although the SDAB is currently an attainment area for CO, there is a potential for the formation of microscale CO "hotspots" to occur immediately around points of congested traffic. Hotspots can form if such traffic occurs during periods of poor atmospheric ventilation, is composed of a large number of vehicles "cold-started" and operating at pollution-inefficient speeds, and/or is operating on roadways already crowded with non-project traffic. Because of continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestions, the potential for CO hotspots in the SDAB is steadily decreasing (CARB 2004).

CO hotspots are typically evaluated when (1) the level of service (LOS) of an intersection or roadway decreases to LOS E or worse, (2) signalization and/or channelization is added to an intersection, and (3) sensitive receptors such as residences, schools, and hospitals are located in the vicinity of the affected intersection or roadway segment. As determined in the traffic analysis, the project is expected to generate approximately 317 daily trips, 26 AM peak hour trips (13 inbound and 13 outbound), and 25 PM peak hour trips (12 inbound and 13 outbound) (LOS Engineering 2019). Project-generated traffic would not cause a studied intersection to decrease to LOS E or worse, and the project would not result in a significant peak hour traffic impact; therefore, localized CO impacts would be considered less than significant.

VOCs and NO_x are precursors to O_3, for which the SDAB is designated as nonattainment with respect to the NAAQS and CAAQS (the SDAB is designated by the U.S. Environmental Protection Agency as an attainment area for the 1-hour O_3 NAAQS and 1997 8-hour NAAQS). The health effects associated with O_3 are generally associated with reduced lung function. The contribution of VOCs and NO_x to regional ambient O_3 concentrations is the result of complex photochemistry. The increases in O_3 concentrations in the SDAB due to O_3 precursor emissions tend to be found downwind from the source location to allow time for the photochemical reactions to occur. However, the potential for exacerbating excessive O_3 concentrations would also depend on the time of year that the VOC emissions would occur because exceedances of the O_3 NAAQS and CAAQS tend to occur between April and October when solar radiation is highest. The holistic effect of a single project's emissions of O_3 precursors is speculative due to the lack of quantitative methods to assess this impact. Due to the minimal contribution during construction and operation, as well as the existing good air quality in coastal San Diego areas, it is not anticipated the project would contribute to regional O_3 concentrations and the associated health effects.

Similar to O_3, construction and operation of the project would not exceed thresholds for PM_{10} or $PM_{2.5}$ and would not contribute to exceedances of the NAAQS and CAAQS for particulate matter. Due to the minimal contribution of particulate matter during construction and operation, it is not anticipated that the project would result in potential health effects related to particulate matter.

(e) Less Than Significant Impact. Odors are the form of air pollution that is most obvious to the general public and can present problems for both the source and surrounding community. Although offensive odors seldom cause physical harm, they can be annoying and cause concern. Odors would be potentially generated from vehicles and equipment exhaust emissions during construction of the project. Odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment. Such odors are temporary and generally occur at magnitudes that would not affect substantial numbers of people. In regard to long-term operations, the project is not a land use that is associated with generating objectionable odors. Therefore, impacts associated with odors would be considered less than significant.

Mitigation: No mitigation measures are required.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☒	☐	☐
d) 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?	☐	☐	☒	☐

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☒	☐	☐

Comments:

A Biological Technical Report was prepared for the proposed project by Dudek in April 2019, and is included as reference herein. The analysis contained in this section is based on the findings of the Biological Technical Report (Dudek 2019b).

(a) Less than Significant with Mitigation Incorporated.

Vegetation Communities

As shown in Table 5, three vegetation communities and three land cover types were identified within the project area including: non-native grassland, southern willow scrub, mulefat scrub, non-native vegetation, disturbed habitat, and developed lands.

Table 5
Vegetation Communities and Land Cover Types in the On-Site and Off-Site Project Area

Vegetation Community/Land Cover Type	MSCP Subarea Plan Tier	Acreage
Southern Willow Scrub (SWS)	Wetlands	0.26
Disturbed Southern Willow Scrub (dSWS)	Wetlands	0.23
Mulefat Scrub (MFS)	Wetlands	0.10
Natural Flood Channel (NFC)	Wetlands	0.01
Non-native Grassland (NNG)	Tier III	7.95
Disturbed Habitat (DH)	Tier IV	0.72
Non-Native Vegetation (NNV)	Tier IV	0.30
Developed Lands (DEV)	N/A	0.13
	Grand Total	**9.61**

Source: Dudek 2019b

Three vegetation communities, southern willow scrub, mulefat scrub, and non-native grassland, are mapped adjacent to the project footprint and may be subject to short-term and long-term indirect impacts. Indirect impacts to this vegetation community would primarily result from adverse edge effects, as stated earlier. During construction of the project, edge effects may include dust, which could disrupt plant vitality in the short term, as well as construction-related soil erosion and runoff.

The proposed project will result in direct permanent impacts to 6.72 acres of the 9.35 acre on-site portion of the project. Off-site impacts total 0.35 acres, of which 0.31 acres are permanent and 0.04 acres are temporary. The acreages of vegetation communities and land cover types within the direct impact footprint for the project are presented in Table 6.

Table 6
Direct Permanent Impacts of the Proposed Project

Vegetation Community/Land Cover	Proposed Impacts			
	MSCP Subarea Plan Tier	*On-site (acres)*	*Off-site (acres)*	
			Perm	*Temp*
Sensitive Vegetation Communities				
Southern Willow Scrub (SWS)	Wetlands	0.21	--	--
Disturbed Southern Willow Scrub (dSWS)	Wetlands	0.20	--	--
Mulefat Scrub (MFS)	Wetlands	--	<0.01	--
Natural Flood Channel (NFC)	Wetlands	0.01	<0.001	--
Non-Native Grassland (NNG)	Tier III	6.21	0.03	--
Non-Sensitive Vegetation Communities/Land Covers				
Non-Native Vegetation (NNV)	Tier IV	0.05	0.06	--
Disturbed Habitat (DH)	Tier IV	0.05	0.03	0.01
Developed Land (DEV)	N/A	--	0.12	--
	Total	**6.73**	**0.25**	**0.01**

Source: Dudek 2019b

Vegetation communities that are considered to be sensitive by the City are listed as wetlands or classified as Tier I through Tier III (City 2003). As shown in Table 6, the proposed project work areas occur within Tier III vegetation and City wetlands; these communities are expected to be directly impacted, since project activities will result in soil disturbance. Therefore, project impacts to non-native grassland (Tier III), southern willow scrub, mulefat scrub, and natural flood channel (Wetlands) are considered significant and require mitigation. Implementation of **MM-BIO-1 and MM-BIO-5** will reduce these impacts to a level below significant. Unexpected impacts (i.e., accidental encroachment) into sensitive vegetation beyond the proposed work areas is considered significant.

Unexpected impacts (i.e., accidental encroachment) into sensitive vegetation beyond the proposed work areas is considered significant. Implementation of **MM-BIO-2** and **MM-BIO-4** will reduce these impacts to a level below significant. In addition, the Project will be required to obtain a HLIT permit, in accordance with the HLIT Ordinance, as described in **MM-BIO-6**.

During construction of the project, edge effects may include dust, which could disrupt plant vitality in the short term, as well as construction-related soil erosion and runoff. However, in accordance with the City's Subarea Plan and the City's BMP Design Manual (City of Chula Vista 2016), projects are required to implement site design, source control, and treatment control BMPs. As part of the project development, projects will be required to meet National Pollutant Discharge Elimination System (NPDES) regulations with the RWQCB, incorporate BMPs during construction, and install permanent BMPs as defined by the BMP Design Manual. With implementation of construction discharge water quality BMPs and other standard construction BMPs these short-term indirect impacts are not expected. Thus, implementation of the proposed project is not expected to indirectly impact any special-status plant species (Dudek 2019b).

Long-term indirect impacts to the southern willow scrub vegetation community may occur as a result of the project. Impacts to the natural flood channel and installation of a storm drain system has the potential to reduce the available surface water to this vegetation community adjacent to the project area. However, this vegetation community consists of established mature trees, which are anticipated to rely primarily on groundwater and the potential reduction in surface water is not expected to significantly impact the remaining southern willow scrub vegetation. Similarly, the mulefat scrub vegetation located adjacent to the project area is not anticipated to be significantly impacted by the project as the new storm drain system will tie-in to the existing storm drain at the southern end of the project area, and is expected to sustain surface water flow consistent with pre-project conditions.

Special-Status Plants

No special-status plant species were observed on-site during the 2012 or the 2016 reconnaissance surveys nor were any observed during the 2017 focused survey. A records search of CNPS and CNDDB was utilized to develop a list of special-status plant species that may have potential to occur on-site due to the presence of suitable habitat (taking into consideration vegetation communities, soils, elevation, and geographic range). These special-status species (i.e., federally, state, or locally listed species), their favorable habitat conditions (life form/blooming period/etc.), and their potential to occur on-site

based on the findings of the field investigations are compiled into a "potential to occur" matrix for individual analysis. Species considered special-status under the City MSCP Subarea Plan, including Narrow Endemic Species, are also included in this analysis. Long-term indirect impacts to the southern willow scrub vegetation community may occur as a result of the project. Impacts to the natural flood channel and installation of a storm drain system has the potential to reduce the available surface water to this vegetation community adjacent to the project area. However, this vegetation community consists of established mature trees, which are anticipated to rely primarily on groundwater and the potential reduction in surface water is not expected to significantly impact the remaining southern willow scrub vegetation. Similarly, the mulefat scrub vegetation located adjacent to the project area is not anticipated to be significantly impacted by the project as the new storm drain system will tie-in to the existing storm drain at the southern end of the project area, and is expected to sustain surface water flow consistent with pre-project conditions.

As shown in Table 7, there were four special-status plant species that are determined to have a moderate potential to occur on site. These species include San Diego thorn-mint (*Acanthomintha ilicifolia*), Orcutt's brodiaea (*Brodiaea orcuttii*), variegated dudleya (*Dudleya variegata*), and Palmer's grapplinghook (*Harpagonella palmeri*). Focused surveys during the blooming period of these species (generally March–June) are typically necessary to determine presence/absence on site. All other special-status plant species analyzed were determined to have low potential of occurrence or are not expected on site (Dudek 2019b).

Table 7
Special-Status Plant Species with Potential to Occur

Scientific Name	Common Name	[1]Status Federal/State/ CRPR/MSCP	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range	Status on-site or Potential to Occur
Acanthomintha ilicifolia	San Diego thorn-mint	FT/SE/1B.1/MSCP[2]	Chaparral, coastal scrub, valley and foothill grassland, vernal pools; clay, openings/annual herb/Apr–June/33–3150	Moderate potential to occur on-site based on vegetation and soils. Recorded within the vicinity[2]. However, this species was not observed during the focused survey.
Brodiaea orcuttii	Orcutt's brodiaea	None/None/1B.1 /MSCP[2]	Closed-cone coniferous forest, chaparral, cismontane woodland, meadows and seeps, valley and foothill grassland, vernal pools; mesic, clay, sometimes serpentinite/perennial bulbiferous herb/May–July/98–5551	Moderate potential to occur on-site based on vegetation and soils. Recorded within the vicinity[2]. However, this species was not observed during the focused survey.

Table 7
Special-Status Plant Species with Potential to Occur

Scientific Name	Common Name	[1]Status Federal/State/ CRPR/MSCP	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range	Status on-site or Potential to Occur
Dudleya variegata	Variegated dudleya	None/None/1B.2/NE	Chaparral, cismontane woodland, coastal scrub, valley and foothill grassland, vernal pools; clay/perennial herb/Apr–June/10–1903	Moderate potential to occur on-site based on vegetation and soils. Recorded within the vicinity[2]. However, this species was not observed during the focused survey.
Harpagonella palmeri	Palmer's grapplinghook	None/None/4.2/None	Chaparral, coastal scrub, valley and foothill grassland; clay/annual herb/Mar–May/66–3133	Moderate potential to occur on-site based on vegetation and soils. Recorded within the vicinity[2]. However, this species was not observed during the focused survey.

Source: Dudek 2019b

Considering no special-status plants, including narrow endemic species, were detected during the reconnaissance surveys or the focused survey, the proposed project would not result in impacts to special-status plant species. Due to the lack of special-status plant species observed during the focused survey, no indirect impacts to special-status plant species are expected.

Special-Status Wildlife

A California Natural Diversity Database records search was performed to develop a list of special-status wildlife species that may have potential to occur on site based to the presence of suitable habitat, elevation, and geographic range. Species considered special status under the City's MSCP Subarea Plan, including Narrow Endemic Species, are also included in this analysis. As shown in Table 8, five special-status wildlife species are determined to have a moderate potential to occur on site. These wildlife species include Cooper's hawk (*Accipiter cooperii*), northern harrier (*Circus cyaneus*), California horned lark (*Eremophila alpestris actia*), yellow warbler (*Setophaga petechia*), and grasshopper sparrow (*Ammodramus savannarum*). All other special-status wildlife species analyzed were determined to have low potential of occurrence or are not expected on-site (Dudek 2019b).

Table 8
Special-Status Wildlife Detected or Potentially Occurring

Scientific Name	Common Name	[1]Status Federal/ State/MSCP	Primary Habitat Associations	Status On-site or Potential to Occur
Birds				
Accipiter cooperii (nesting)	Cooper's hawk	None/ WL/ MSCP2	Nests and forages in dense stands of live oak, riparian woodlands, or other woodland habitats often near water	Moderate potential to forage on-site, suitable riparian habitat is relatively narrow and small. Not expected to nest on-site within riparian areas. This species has become relatively urban adapted. Recorded within the region[3]
Ammodramus savannarum (nesting)	Grasshopper sparrow	None/ SSC/ None	Nests and forages in moderately open grassland with tall forbs or scattered shrubs used for perches	Moderate potential. Suitable grassland habitat is present; however, the site is limited in size and isolated from any open areas. Low potential for nesting on-site. Recorded within the region[3].
Circus cyaneus (nesting)	Northern harrier	None/ SSC/ MSCP2	Nests in open wetlands (marshy meadows, wet lightly-grazed pastures, old fields, freshwater and brackish marshes); also in drier habitats (grassland and grain fields); forages in grassland, scrubs, rangelands, emergent wetlands, and other open habitats	Moderate potential. Suitable foraging habitat is present on-site; however, no suitable habitat for nesting. Recorded within the region[3].
Eremophila alpestris actia	California horned lark	None/ WL/ None	Nests and forages in grasslands, disturbed lands, agriculture, and beaches; nests in alpine fell fields of the Sierra Nevada	Moderate potential to occur. Limited suitable grassland habitat on-site. Recorded within the vicinity[2].
Setophaga petechia (nesting)	yellow warbler	BCC/SSC/ None	Nests and forages in riparian and oak woodlands, montane chaparral, open ponderosa pine, and mixed-conifer habitats	Moderate potential. Riparian habitat present, but is a relatively small area and is isolated from other suitable habitats; low potential for nesting. Recorded within the region[3].
Elanus leucurus (nesting)	White-tailed kite	None/ FP/ None	Open grasslands, savanna-like habitats, agriculture, wetlands, oak woodlands, riparian	Observed on-site in 2012. Pair observed in willow tree within SWS patch. The species may use the site for foraging or roosting but it is unlikely to nest on-site due to small and isolated nature of the habitat. Species not recorded in vicinity[2].

[1] Status Designations
The federal and state status of species primarily is based on the Special Animals List (October 2017), California Department of Fish and Wildlife.
State Designations:
SSC: California Species of Special Concern
FP: California Department of Fish and Wildlife Protected and Fully Protected Species
WL: California Department of Fish and Wildlife Watch List

MSCP Designations:
MSCP[2]: City of Chula Vista MSCP Subarea Plan species with known occurrences or suitable habitat within the Chula Vista Subarea (*Chula Vista Subarea Plan Covered Species* Table 4-2)

Notes:

[2] Vicinity = Jamul Mountain 7.5 minute quadrangle

[3] Region = Nine, 7.5 minute quadrangles including and surrounding Jamul Mountain.

An additional seven special-status species have potential to occur within the non-native grassland and riparian habitats in the project area (see Section 3.3.2). Although Cooper's hawk (state-listed watch list species, MSCP covered), northern harrier (state-listed species of special concern, MSCP covered), California horned lark, (state-listed watch list species, MSCP not covered), yellow warbler (state-listed species of special concern, MSCP not covered), and grasshopper sparrow (state-listed species of special concern, MSCP not covered) may use the site for foraging, nesting is not anticipated due to the and lack of suitable nesting habitat. Thus, direct impacts to these species is not anticipated. Furthermore, these species are highly mobile and would not likely be directly impacted by project activities. If construction occurs during the general bird breeding season (February 15 through August 31), direct impacts to general nesting birds could occur.

Direct impacts to nesting birds is considered a significant impact without mitigation. If Project construction occurs during the general bird nesting season (i.e., February 15 through August 31 for most bird species), such activities could potentially result in direct "take" of individuals and/or eggs in violation of the Federal Migratory Bird Treaty Act of 1918 (MBTA) and State Fish and Game Code 3505. Implementation of **MM-BIO-3** and **MM-BIO-4** will reduce impacts to nesting birds, including special-status species with potential to occur, to below significant.

The indirect impacts to vegetation communities noted above can also affect special-status wildlife. However, with implementation of required construction discharge water quality BMPs, other standard construction BMPs (including dust control, use of approved access and staging areas, use of trash receptacles, sediment control measures, and more) these short-term indirect impacts are not expected.

In addition, wildlife may be indirectly affected in the short-term and long-term by noise and lighting which can disrupt normal activities and subject wildlife to higher predation risks. Breeding birds can be affected by short-term construction-related noise, which can result in the disruption of foraging, nesting, and reproductive activities. The disturbed habitat surrounding the project area may support habitat for nesting birds. Indirect impacts from construction-related noise may occur to nesting birds if construction occurs during the breeding season (i.e., February 15 through August 31 for most bird species; and January 1 through August 31 for raptors).

In summary, impacts to species identified as candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or U.S. Fish and Wildlife Service would be less than significant with mitigation incorporated.

(b) Less Than Significant with Mitigation Incorporated. As outlined above, impacts to native upland vegetation communities and wetlands habitats are considered significant under the Subarea Plan and in accordance with the HLIT Ordinance require mitigation (Dudek 2019b). Vegetation communities considered sensitive under the City Subarea Plan are those listed as Tier I through Tier III, rare to common uplands, respectively, as well as wetlands. The proposed project work areas occur within Tier III vegetation and City wetlands; these communities are expected to be directly impacted, since project activities will result in soil disturbance. Therefore, project impacts to non-native grassland (Tier III), southern willow scrub, mulefat scrub, and natural flood channel (wetlands) are considered significant and require mitigation. Implementation of **MM-BIO-1** and **MM-BIO-2** will reduce these impacts to a level below significant.

During construction of the project edge effects may include dust, which could disrupt plant vitality in the short term, as well as construction-related soil erosion and runoff. However, in accordance with the City's Subarea Plan and the City's Best Management Practices (BMP) Design Manual (City of Chula Vista 2016), projects are required to implement site design, source control, and treatment control BMPs. As part of the project development, projects will be required to meet National Pollutant Discharge Elimination System regulations with the RWQCB, incorporate BMPs during construction, and install permanent BMPs as defined by the BMP Design Manual. With implementation of construction BMPs, implementation of the proposed project is not expected to indirectly impact any vegetation communities (Dudek 2019b). Impacts to riparian habitat or other sensitive natural communities would be less than significant with mitigation incorporated.

(c) Less Than Significant with Mitigation Incorporated. A formal jurisdictional delineation of waters of the United States, including wetlands, under the jurisdiction of the U. S. Army Corps of Engineers (ACOE), CDFW, and Regional Water Quality Control Board (RWQCB) was conducted for the property. The entire property was evaluated for evidence of an ordinary high water mark (OHWM), surface water, saturation, wetland vegetation, and nexus to a navigable water. The extent of any identified jurisdictional areas was determined by mapping the areas with similar vegetation and topography to the sampled locations. Jurisdictional features were determined and recorded directly in the field using a GPS unit. Subsequent to the field work, this GPS data was transferred to topographic base, and a GIS coverage was created.

Results of the jurisdictional wetlands delineation concluded that areas on site are subject to jurisdiction by the ACOE, RWQCB, CDFW, and the City. The proposed project would directly impact approximately 0.001 acre (50 linear feet) of non-wetland waters of the U.S. off-site, regulated by ACOE, RWQCB, CDFW, and the City. Additionally, there would be direct impacts to approximately 0.01 acre of mulefat scrub riparian vegetation regulated by CDFW and the City, within the off-site portion of the project area. The direct loss of approximately 0.01-acres (345 linear feet) on-site and 0.001 acre (50 linear feet) off-site of natural flood channel (i.e., non-wetland WOUS) as a result of the project is considered significant and requires mitigation. Implementation of **MM-BIO-1** will reduce these impacts to a level below significant.

The direct loss of approximately 0.41 acre of riparian vegetation (southern willow scrub and disturbed southern willow scrub) on-site, and approximately 0.01 acre of riparian vegetation (mulefat scrub) off-site as a result of the project is considered significant and requires mitigation. Implementation of **MM-BIO-1** will reduce these impacts to a level below significant.

Unexpected impacts (accidental encroachment) into adjacent jurisdictional WOUS is considered significant. Implementation of **MM-BIO-2** and **MM-BIO-4** will reduce these impacts to a level below significant.

The potential short-term indirect impacts to vegetation communities described above also apply to off-site jurisdictional waters only. On-site waters will be 100% impacted. Potential edge effects to the jurisdictional WOUS identified in the off-site portion of the project area are not anticipated since BMPs will be incorporated into the proposed project work area to eliminate any indirect impacts (e.g., dust, erosion, and runoff) to jurisdictional waters. Therefore, impacts to federally protected wetlands would be less than significant with mitigation incorporated.

(d) Less Than Significant Impact. Wildlife corridors are linear features that connect large patches of natural open space and provide avenues for the immigration and emigration of animals. Wildlife corridors contribute to population viability in several ways: (1) they allow the continual exchange of genes between populations, which helps maintain genetic diversity; (2) they provide access to adjacent habitat areas, representing additional territory for foraging and mating; (3) they allow for a greater carrying capacity of wildlife populations by including “live-in” habitat; and (4) they provide routes for recolonization of habitat lands following local population extinctions or habitat recovery from ecological catastrophes, such as fires.

Habitat linkages are patches of native habitat that function to join two substantially larger patches of habitat. They serve as connections between distinct habitat patches and help reduce the adverse effects of habitat fragmentation. Although individual animals may not move through a habitat linkage, the linkage does represent a potential route for gene flow and long-term dispersal. Habitat linkages may serve both as habitat and as avenues of gene flow for small animals, such as reptiles and amphibians. Habitat linkages may be represented by continuous patches of habitat or by nearby habitat "islands" that function as "stepping-stones" for dispersal (Dudek 2019b).

The project site is disturbed, lacks connectivity to any natural undeveloped areas, and is isolated by the surrounding existing development. The only native habitat (southern willow scrub, including the disturbed form) on site is relatively small in size, is heavily disturbed in character, and is confined to two isolated patches on site. The majority of the site is non-native annual grassland, which can provide suitable habitat for some reptile and small mammal species; however, given the spatial context of the site and characteristics mentioned above, the project site does not serve as a wildlife corridor or habitat linkage; thus, impacts are determined to be less than significant.

(e) Less Than Significant Impact. The proposed project site is located within the Development Area of the City Planning Component as identified in the Subarea Plan and as such has not been identified as a strategic preserve area within the City nor is it located within a designated conservation area; therefore, the proposed project would not impact the goals and objectives of the City's Subarea Plan. Additionally, the City's Tree Preservation Ordinance (Policy Number 576-05) only establishes policies for the preservation of City street trees. Implementation of the proposed project would not affect the removal of any trees considered street trees within the City, and therefore would not conflict with a tree preservation policy or ordinance. Implementation of the proposed project would not conflict with any local policies or ordinances protecting biological resources, and impacts are determined to be less than significant.

(f) Less Than Significant Impact with Mitigation Incorporated. The proposed project design is consistent with the MSCP Subarea Plan through specific adherence to mitigation/conveyance requirements for Development Projects Outside of Covered Projects as defined in the Chula Vista MSCP Subarea Plan. As stated above, the proposed project site is located within the Development Area of the City Planning Component as identified in the Subarea Plan and as such has not been identified as a strategic preserve area within the City nor is it located within a designated conservation area; therefore, the proposed project would not impact the goals and objectives of the City's Subarea Plan.

Mitigation: The mitigation measures outlined below are required to offset significant direct and indirect impacts to sensitive vegetation communities, nesting birds, and jurisdictional resources. These mitigation measures would reduce identified and potential significant impacts to a less than significant level.

MM-BIO-1 The City requires that impacts to wetland be avoided to the maximum extent possible and where impacts are unavoidable, compensatory mitigation within the Chula Vista Subarea or Chula Vista Planning Area shall be required resulting in no overall net loss of wetlands. A total of up to 0.42 acres of wetlands within the project may be impacts within the development area.

Prior to issuance of land development permits, including clearing, grubbing, grading and/ or construction permits that impact jurisdictional waters, the project Applicant shall obtain all necessary permits from the ACOE, RWQCB, and CDFW, and shall mitigate direct impacts pursuant to the City's MSCP Subarea Plan and in accordance with the terms and conditions of all required permits. Areas under the jurisdictional authority of the ACOE, RWQCB, and CDFW shall be delineated on all grading plans.

The Applicant shall secure mitigation credits within a City-approved Conservation Bank within the City's MSCP Subarea Plan boundaries in accordance with the terms and conditions of all required permits. Verification of mitigation credit purchase by the Applicant to the City and Wetland Agencies is required prior to issuance of any land development permits.

If mitigation credits are not purchased, the Applicant must prepare a Wetlands Mitigation and Monitoring Plan to the satisfaction of the City, ACOE, RWQCB, and CDFW. The plan shall include, at a minimum, an implementation strategy; species salvage and relocation; appropriate seed mixtures and planting method; irrigation; quantitative and qualitative success criteria; maintenance, monitoring, and reporting program; estimated completion time; contingency measures; and identify a long-term funding source. The project Application shall also be required to implement the Wetlands Mitigation and Monitoring Plan subject to the oversight and approval of the Development Services Director (or their designee), ACOE, RWQCB, and CDFW.

Prior to issuance of land development permits, including clearing, grubbing, and grading permits for areas that impact jurisdictional waters, the project Applicant shall provide evidence that all required regulatory permits, such as those required under Section 404 of the federal Clean Water Act, Section 1600 of the California Fish and Game Code, and the Porter Cologne Water Quality Act have been obtained.

MM-BIO-2 Prior to issuance of land development permits, including clearing, grubbing, grading and/or construction permits, the Project Applicant shall install temporary construction fencing in accordance with Chula Vista Municipal Code (CVMC) 17.35.030 to avoid any unexpected accidental impacts (i.e., encroachment) into sensitive vegetation and/or jurisdictional waters. Prominently colored, well installed fencing and signage shall be in place to demarcate all approved access paths and construction work areas wherever the limits of grading are adjacent to sensitive vegetation communities or other biological resources, as identified by the qualified monitoring biologist. The limits of work, including the designated temporary off-site construction access, will be delineated with temporary construction fencing as appropriate, which will be installed prior to initiation of work activities.

Fencing shall remain in place during all construction activities. All temporary fencing shall be shown on grading plans for areas adjacent to the preserve and for all off-site facilities constructed within the preserve. Prior to release of grading and/or improvement bonds, a qualified biologist shall provide evidence that work was conducted as authorized under the approved land development permit and associated plans.

A pre-construction meeting should be held between all contractors and the qualified project biologist and during this meeting, the biologist will educate the contractors on sensitive habitat and project avoidance measures. All project personnel, shall provide written acknowledgement of their receiving avoidance training. This training shall include information on the location of the approved access paths and work areas, the necessity of preventing damage and impacts to sensitive habitat; and the discussion of work practices that will accomplish such. Lastly, the project biologist will be on-site to monitor all project activities within natural habitats.

If unauthorized impacts occur outside of the approved project boundary, the contractor shall notify the City Resident Engineer and project biologist immediately. The project biologist shall evaluate the additional impacts to determine the size of the impact and the vegetation communities, land covers and/or jurisdictional resources impacted. The footprint of the impact shall be recorded with a GPS and the project biologist will report the impact(s) to City Staff as well as to the appropriate permitting agencies (where appropriate) for approval of the impact record and to establish any necessary follow-up mitigation measures. These measures may include development of an in-place Revegetation Plan for the identified impacts, including a 120-day plant establishment period and subsequent 25-month maintenance and monitoring period to ensure success of the revegetation effort.

Any unauthorized impacts to jurisdictional waters/wetlands would require reporting to the ACOE, CDFW, RWQCB, and the City as well as development of a Waters/Wetlands Restoration Plan to restore pre-impact conditions as directed by the agencies. The Revegetation Plan and/or Waters/Wetlands Restoration Plan shall include a description of the suitability of the restoration area, planting and irrigation plan, maintenance and monitoring requirements, and performance standards that ensures that the intended restoration is achieved. The plan(s) and associated monitoring reports shall be submitted to City staff.

MM-BIO-3 To avoid any direct impacts to nesting birds, construction activities should occur outside of the breeding season (February 15 to August 31). If construction activity is scheduled during the general bird breeding season, a qualified biologist shall conduct a pre-construction survey to determine the presence or absence of nesting bird species within the proposed work areas. The pre-construction survey shall be conducted within 4 calendar days prior to the start of construction activities. The applicant shall submit the results of the pre-construction survey to City Staff for review and approval prior to initiating any construction activities. If nesting birds are detected, a letter report or mitigation plan in conformance with the applicable local, State, and Federal Law (i.e., appropriate follow up surveys, monitoring schedules, construction and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. The report or mitigation plan shall be submitted to the City for review and approval and implemented to the satisfaction of the City. The City RE and/or project Biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction. If nesting birds are not detected during the pre-construction survey, no further mitigation is required. Implementation of pre-construction surveys for nesting birds, and any required follow up protection measures, will reduce the potential impact levels to below significant.

MM-BIO-4 Prior to issuance of land development permits, including clearing, grubbing, grading, and/or construction permits, the project Applicant shall provide written confirmation that a City-approved biological monitor has been retained and shall be on site during clearing, grubbing, and/or grading activities. The biological monitor shall attend all preconstruction meetings and be present during the removal of any vegetation to ensure that the approved limits of disturbance are not exceeded and provide periodic monitoring of the impact area including, but not limited to, trenches, stockpiles, storage areas and protective fencing. The biological monitor shall be authorized to halt all associated project activities that may be in violation of

the City's MSCP Subarea Plan and/or permits issued by any other agencies having jurisdictional authority over the project.

Before construction activities occur in areas containing sensitive biological resources, all workers shall be educated by a City-approved biologist to recognize and avoid those areas that have been marked as sensitive biological resources.

MM-BIO-5 A total of up to 6.24 acres of non-native grassland within the project may be impacted within the Development Area. Prior to the issuance of any land development permits that impact non-native grassland, including clearing, grubbing, grading, and/or construction permits, the Project Applicant shall mitigate direct impacts pursuant to the City's MSCP Subarea Plan consistent with the ratios listed in Table 5-3 of the Subarea Plan.

The Applicant shall secure mitigation credits within a City-approved Conservation Bank within the City's MSCP Subarea Plan boundaries. Verification of mitigation credit purchase by the Applicant to the City is required prior to issuance of any land development permits.

If mitigation credits are not purchased, the Applicant shall prepare a Habitat Mitigation and Monitoring Plan to the satisfaction of the City. The Habitat Mitigation and Monitoring Plan shall include, at a minimum, an implementation strategy; species salvage and relocation; appropriate seed mixtures and planting method; irrigation; quantitative and qualitative success criteria; maintenance, monitoring, and reporting program; estimated completion time; contingency measures; and identify a long-term funding source. The Project Applicant shall also be required to implement the Habitat Mitigation and Monitoring Plan subject to the oversight and approval of the Development Services Director (or their designee).

MM-BIO-6 Prior to issuance of any land development permits (including clearing, grubbing and/or grading permits), the project will be required to obtain a HLIT Permit pursuant to Section 17.35 of the Chula Vista Municipal Code for impacts to MSCP Tier II habitats and wetland resources.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☒	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

A Cultural Resources Technical Memorandum was prepared for the proposed project by LSA in October 2018 and is included as reference herein. The analysis contained in this section is based on the findings of the Cultural Resources Technical Memorandum (LSA 2018).

Comments:

(a) No Impact. The project site is currently vacant with the exception of an existing SDG&E tower. The site has been previously graded and disturbed. No other structures exist on site and no impact to historical resources would occur.

(b) Less Than Significant with Mitigation Incorporated. Although unlikely due to the existing graded and disturbed nature of the project site, in the occurrence an archaeological resource is found during construction activities, implementation of **MM-CUL-1** will reduce the potential for impacts to such resources to less than significant.

(c) Less Than Significant with Mitigation Incorporated. Although unlikely due to the existing graded and disturbed nature of the project site, in the event that paleontological

resources are uncovered during construction activities, implementation of **MM-CUL-2** will reduce the potential for impacts to such resources to less than significant.

(d) Less Than Significant. The project site is not currently used as a cemetery and is not otherwise known to contain human remains. However, it is possible that human remains may be found during project excavation and grading activities. Should any human remains be encountered during ground-disturbing activities, the proposed project would comply with the California Health and Safety Code, Section 7050.5. As required by California Health and Safety Code, Section 7050.5, no further disturbance shall occur in areas that could contain human remains until the County Coroner has made a determination of origin and disposition pursuant to California Public Resources Code, Section 5097.98. The requirements of California Public Resources Code, Section 5097.98, state that the County Coroner must be notified of the find immediately. If the human remains are determined to be prehistoric, the County Coroner will notify the Native American Heritage Commission within 24 hours. The Native American Heritage Commission will then determine and notify a Most Likely Descendant. The Most Likely Descendant shall complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Compliance with existing regulations for proper protocol of inadvertent discovery of human remains would ensure that impacts would be less than significant.

Mitigation:

MM-CUL-1 During ground-disturbing work (i.e., grading and excavation), spot-check monitoring by a qualified archaeologist shall be conducted in order to help identify any potential cultural resources that may be buried and aid in minimizing delays in construction.

In the event that cultural resources are unearthed during project excavation, all project construction activities within 200 feet of the discovery shall cease. The prime contractor shall immediately notify the City of Chula Vista (City). Upon notification of the discovery, the City shall retain a qualified archaeologist who meets the Secretary of the Interior's Professional Qualification Standards to assess the potential significance of the discovery and propose appropriate mitigation per the California Environmental Quality Act (CEQA) or Section 106 of the National Historic Preservation Act. Work within 200 feet of the discovery shall not continue until the qualified archaeologist has completed the assessment of the discovery.

If human remains are encountered, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. The county Coroner shall be notified of the find immediately. If the remains are determined to be Native American, the County Coroner shall notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD). With the permission of the landowner, or their designee, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. The MLD may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

MM-CUL-2 In the event that paleontological resources are unearthed during project excavation, the area of discovery shall be roped off with a 50-foot-radius buffer and the City shall be notified. A qualified paleontologist shall be retained to assess the find and provide appropriate mitigation. Once documentation and collection of the find is completed, the qualified paleontologist shall remove the rope and allow grading to recommence in the area of the find. The paleontologist shall prepare a paleontological resources impact mitigation program for the proposed project. The paleontological resources impact mitigation program shall be consistent with the guidelines of the Society of Vertebrate Paleontology.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. GEOLOGY AND SOILS. Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) 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?	☐	☐	☒	☐

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

Comments:

A Geotechnical Report was prepared by GeoSoils Inc. for the proposed project and is included by reference (GeoSoils 2016). Additionally, a Preliminary Drainage Study and was prepared by Hunsaker & Associates (Hunsaker & Associates 2016), and Priority Development Project Storm Water Quality Management Plan (Hunsaker & Associates 2018) were prepared for the project. These reports are used to support the analysis included below**.**

(a)

(i) **Less Than Significant Impact.** Active or potentially active faults are not shown on or in the immediate vicinity of the proposed project site on published geologic maps or on the City of Chula Vista General Plan Geologic Hazards Map, Figure 9-7 (City of Chula Vista 2005a). The proposed project site is not located within an Alquist–Priolo earthquake fault zone (GeoSoils 2016). Additionally, the site-specific report concluded that no active faults exist on site (GeoSoils 2016). The nearest known active fault is the Rose Canyon Fault, located approximately 11.0 miles from the project site. The LaNacion fault is located about 2.4 miles west of the project site, however, it is not considered seismogenic or active (GeoSoils 2016). The proposed project would be constructed in accordance with the requirements of the governing jurisdictions, California Building Code (CBC), and standard practices of the Association of Structural Engineers of California. The proposed project would not expose people or structures to impacts related to rupture of a known earthquake fault. Impacts would therefore be less than significant.

(ii) **Less Than Significant Impact.** No active earthquake faults are identified as occurring on or directly adjacent to the project site (City of Chula Vista 2005a, Figure 9-7; GeoSoils 2016). The project site is not located within an Alquist–Priolo fault zone (GeoSoils 2016). Additionally, the site specific report prepared concluded that possible ground shaking or acceleration on-site would be similar to the southern California region as a whole, and effects would be minimized through compliance with the CBC. Therefore, through adherence with CBC requirements, impacts resulting from seismic related ground shaking would be less than significant.

(iii) **Less Than Significant Impact.** Liquefaction is a process in which strong ground shaking causes saturated soils to lose their strength and behave as a fluid. Ground failure associated with liquefaction can result in severe damage to structures. The geologic conditions for increased susceptibility to liquefaction are shallow groundwater (less than 50 feet in depth), the presence of unconsolidated sandy alluvium, and strong ground shaking. According to the City of Chula Vista General Plan, the proposed project site is not located within a liquefaction hazard area (City of Chula Vista 2005a, Figure 9-7). The site-specific report prepared for the project also concluded that due to the dense nature of the underlying formational soils, the potential for the site to be affected by liquefaction would be very low (GeoSoils 2016). Additionally, all construction associated with the proposed project would comply with the CBC and with City of Chula Vista building requirements. Thus, impacts associated with liquefaction would be less than significant.

(iv) **Less Than Significant Impact.** The proposed project site is not located within a landslide hazard area as indicated in the City of Chula Vista General Plan (City of Chula Vista 2005a, Figure 9-7). Additionally, the site-specific report prepared for the project concluded that no known active faults cross the site and that the natural slope which the site is located on has a very low susceptibility for landslides. Therefore, impacts would be less than significant.

(b) Less Than Significant Impact. According to the Preliminary Drainage Study, the project site is currently undeveloped and drains towards the south with and average slope of approximately 4.5%. (Hunsaker & Associates 2016). A storm drain conveys runoff underneath the access road, east of the St. Germain Road cul-de-sac, and empties it just south of the road. This runoff continues south towards SR-125 where it then confluences with flows in Telegraph Canyon Creek. Off-site runoff from areas north of the project boundary traverse the proposed site (Hunsaker & Associates 2016). As discussed in the Geotechnical Investigation, soils underlying the project site are considered erosive, therefore, properly designed site drainage is necessary in reducing erosion damage to the planned improvements (GeoSoils 2016).

During construction, cut and fill slopes will be subject to surficial erosion during and after grading. Because on-site earth materials have a moderate to high erosion potential, the Geotechnical Investigation provides recommendations to minimize erosion, such as hay bales and silt fences for the temporary control of surface water (GeoSoils 2016). In addition to the geotechnical recommendations, construction projects that involve the disturbance of 1 or more acres of soil are required to obtain coverage under the State Water Resources Control Board General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit). The Construction General Permit requires the development and implementation of a stormwater pollution prevention plan (SWPPP), which contains standard construction BMPs intended to prevent the off-site discharge of soil or construction materials in stormwater. The SWPPP would contain a site map(s) that depicts the location of standard construction BMPs which are intended to prevent the off-site discharge of soil or construction materials in stormwater.

During operations, the proposed drainage facilities will include storm drains, cleanouts, inlets, brow ditches, catch basins and rip-rap at pipe outlets for energy dissipation. A detention basin at the southern project boundary is proposed to attenuate these peak flows below the existing condition amounts (Hunsaker &Associates 2018). As in the existing condition, off-site areas from north of the project boundary will traverse the site. However, this off-site runoff will not be routed through the proposed basin. The project would comply with the Priority Development Plan (PDP) City of Chula Vista BMP Design Manual, which is based on the requirements of the San Diego Regional Water Quality Control Board MS4 Permit. A PDP Storm Water Quality Management Plan (SWQMP) was prepared for the proposed Project, which includes erosion control BMPs, as well as all on-site drainage pathways that convey concentrated flows to be stabilized to prevent erosion (Hunsaker & Associates 2018).

With implementation of the recommendations included in the Geotechnical Investigation, SWPPP and SWQMP, the potential for substantial soil erosion or the loss of topsoil is considered less than significant.

(c) Less Than Significant Impact. Refer to Responses VI(a)(iii) and VI(a)(iv). No active earthquake faults are identified as occurring on or directly adjacent to the project site. The nearest known active fault is the Rose Canyon Fault Zone, located approximately 11 miles from the project site. There are no known active faults crossing the site and the natural slope upon which the site is located has very low susceptibility to deep-seated landslides (GeoSoils 2016). Owing to the depth to groundwater and the dense nature of the underlying formational soils, the potential for the site to be adversely affected by liquefaction is considered very low

(GeoSoils 2016). Preliminary and future geotechnical recommendations shall be considered in project design to avoid structural conflicts with potential perched groundwater. For example, the Preliminary Geotechnical Investigation recommends installation of subgrade separators (cut-offs) between pavement subgrade and landscape areas. Cut-offs, if used, should be 6 inches wide and at least 12 inches below the pavement subgrade contact or 12 inches below the crushed aggregated base rock, if utilities. Additionally, as indicated on Figure 9-7: Geologic Hazards Map of the City of Chula Vista General Plan, the proposed project site is not located within an area of high liquefaction potential or within a landslide hazard area (City of Chula Vista 2005a). Impacts would be less than significant.

(d) Less Than Significant Impact With Mitigation Incorporated. Expansive soils contain high levels of clay that expand when wet and contract when dry, which can damage building foundations and other structures. The project site is underlain by Oligocene-age Otay Formation. Soils on site are anticipated to generally consist of relatively clayey to sandy material, and when tested for expansiveness were found to be very low expansive to medium expansive (GeoSoils 2016). As such, some site soil meets the criteria of detrimentally expansive soils as defined in Section 1803.5.2 of the 2013 CBC. Due to the expansive, clayey nature of some site soils, these soils will likely not be suitable for use as wall backfill, thus requiring the use of a select import, such as any segmental retaining walls (GeoSoils 2016). Due to these conditions, the foundation design and construction would need to consider the expansive soil conditions evaluated on-site, in accordance with minimum CBC requirements for detrimentally expansive soils.

Therefore, with adherence to the CBC and implementation of recommendations of the geotechnical report, the potential for impacts associated with expansive soils would be less than significant**.**

(e) No Impact. Implementation of the proposed project would not result in the need for a septic tank or alternative wastewater disposal system. No impact would result.

Mitigation: No mitigation measures are required.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GREENHOUSE GAS EMISSIONS -- Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases	☐	☐	☒	☐

Dudek prepared an Air Quality and Greenhouse Gas Emissions Assessment for the proposed project that is included as reference herein (Dudek 2019a). The analysis contained in this section is based on the findings of the Air Quality and Greenhouse Gas Emissions Assessment.

Comments:

(a) Less Than Significant Impact.

Construction Emissions

Construction of the project would result in greenhouse gas (GHG) emissions, which are primarily associated with use of off-road construction equipment, on-road vendor trucks, and worker vehicles. Construction of the project is anticipated to commence in January 2020 and reach completion by the July of 2021. On-site sources of GHG emissions include off-road equipment and off-site sources include on-road vehicles (haul trucks, vendor trucks, and worker vehicles). Table 9 presents construction emissions for the project in 2020 and 2021 from on-site and off-site emission sources.

Table 9
Estimated Annual Construction GHG Emissions

Year	CO_2	CH_4	N_2O	CO_2e
	Metric Tons per Year			
2020	853.03	0.11	0.00	855.87
2021	294.82	0.04	0.00	295.84
Total	**1,147.85**	**0.15**	**0.00**	**1,151.71**

Source: See Air Quality and Greenhouse Gas Emissions Assessment Memorandum (Dudek 2019a) for detailed results
Notes: CH_4 = methane; CO_2 = carbon dioxide; CO_2E = carbon dioxide equivalent; N_2O = nitrous oxide.

As shown in Table 9, the estimated total GHG emissions during construction of would be approximately 1,198 metric tons (MT) carbon dioxide equivalent (CO_2E) over the construction period, which equates to approximately 40 MT CO_2E when annualized over a 30-year project life. However, because there is no established GHG threshold for construction, the evaluation of significance is discussed in the operational emissions analysis below.

Operational Emissions

Operation of the project would generate GHG emissions through motor vehicle trips to and from the project site; energy use (natural gas and generation of electricity consumed by the project); solid waste disposal; and generation of electricity associated with water supply, treatment, and distribution and wastewater treatment. Although the City does not currently have an operational GHG threshold, the project's operational GHG emissions in addition to its amortized construction emissions are evaluated using the 900 MT CO_2E screening criteria as established by the California Air Pollution Control Officers Association (CAPCOA). The estimated operational project-generated GHG emissions are shown in Table 10.

Table 10
Estimated Annual Operational GHG Emissions

Emission Source	CO_2	CH_4	N_2O	CO_2e
	Metric Tons per Year			
Area	<0.01	<0.01	0.00	<0.01
Energy	86.58	<0.01	<0.01	86.92
Mobile	361.97	0.02	0.00	362.44
Waste	23.10	1.37	0.00	57.23
Water	88.53	0.98	0.02	119.99
Amortized construction emissions	—	—	—	38.39
			Total	**664.97**

Source: See Air Quality and Greenhouse Gas Emissions Assessment Memorandum (Dudek 2019a) for detailed results.
Notes: CH_4 = methane; CO_2 = carbon dioxide; CO_2e = carbon dioxide equivalent; N_2O = nitrous oxide.
Project emissions include adjustments to the trip generation rates as provided in the traffic analysis (LOS Engineering 2019), compliance with 2019 Title 24 standards in which nonresidential buildings will use approximately 30% less energy than 2016 standards, a 20% indoor water consumption consistent with CALGreen, and diversion of 25% of all solid waste by 2020, and annually thereafter, consistent with AB 341. The SDG&E energy intensity factors were updated to reflect that SDG&E has delivered 44% of the electricity from RPS eligible resources.

As shown in Table 10, estimated annual project-generated GHG emissions in addition to amortized construction emissions would be approximately 665 MT CO_2e per year. Emissions from the project would be below the CAPCOA's 900 MT CO_2e screening threshold. As such, impacts would be less than significant.

(b) Less Than Significant Impact. In 2014, a Climate Change Working Group (CCWG) led by City staff and comprised of residents, businesses and community organization representatives, reconvened to update measures within the previously adopted GHG reduction plans. The City of Chula Vista adopted a Climate Action Plan (CAP) in 2017, to reduce the City's GHG emissions and the impacts of climate change. The CAP identifies 11 action areas which will help the City reduce GHG emissions by approximately 208,220 MT CO2e or 0.7 MT per capita emissions. When combined with reductions from state and federal regulations, an additional reduction of approximately 194,950 MT CO2e or 0.4 MT of per capita reductions is anticipated. The 11 action areas encompass the following: water conservation and reuse, waste reduction, renewable and efficient energy, smart growth and transportation. Most of the GHG reduction measures outlined within the CAP are not explicitly intended for projects to determine consistency. These measures would serve to help the City develop and implement policies in order to make progress towards meeting the state's 2050 GHG reduction goal. The project would meet Title 24 and CALGreen standards to reduce energy demand and increase energy efficiency. Therefore, the project would provide opportunities for improved energy efficiency that would support state and local plans.

The Scoping Plan, approved by CARB on December 12, 2008, provides a framework for actions to reduce California's GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. As such, the Scoping Plan is not directly applicable to specific projects. Relatedly, in the Final Statement of Reasons for the Amendments to the CEQA Guidelines, the CNRA observed that "[t]he [Scoping Plan] may not be appropriate for use in determining the significance of individual projects because it is conceptual at this stage and relies on the future development of regulations to implement the strategies identified in the Scoping Plan" (CNRA 2009). Under the Scoping Plan, however, there are several state regulatory measures aimed at the identification and reduction of GHG emissions. CARB and other state agencies have adopted many of the measures identified in the Scoping Plan. Most of these measures focus on area source emissions (e.g., energy usage, high-GWP GHGs in consumer products) and changes to the vehicle fleet (i.e., hybrid, electric, and more fuel-efficient vehicles) and associated fuels (e.g., Low Carbon Fuel Standard), among others. To the extent that these regulations are applicable to the project, the project would comply with all regulations adopted in furtherance of the Scoping Plan to the extent required by law.

The Final Statement of Reasons for the amendments to the CEQA Guidelines reiterates the statement that "[t]he Scoping Plan may not be appropriate for use in determining the significance of individual projects because it is conceptual at this stage and relies on the

future development of regulations to implement the strategies identified in the Scoping Plan" (CNRA 2009). Under the Scoping Plan, however, there are several state regulatory measures aimed at the identification and reduction of GHG emissions. CARB and other state agencies have adopted many of the measures identified in the Scoping Plan. Most of these measures focus on area source emissions (e.g., energy usage, high-global-warming-potential GHGs in consumer products) and changes to the vehicle fleet (hybrid, electric, and more fuel-efficient vehicles) and associated fuels (e.g., Low Carbon Fuel Standard), among others. While state regulatory measures would ultimately reduce GHG emissions associated with the project through their effect on these sources, no statewide plan, policy, or regulation would be specifically applicable to reductions in GHG emissions from the project.

Regarding consistency with SB 32 (goal of reducing GHG emissions to 40% below 1990 levels by 2030) and Executive Order S-3-05 (goal of reducing GHG emissions to 80% below 1990 levels by 2050), there are no established protocols or thresholds of significance for that future year analysis. However, CARB has expressed optimism regarding the 2030 and 2050 goals. It states in the First Update that "California is on track to meet the near-term 2020 GHG emissions limit and is well positioned to maintain and continue reductions beyond 2020 as required by Assembly Bill (AB) 32" (CARB 2014). Regarding the 2050 target for reducing GHG emissions to 80% below 1990 levels, the First Update states the following (CARB 2014):

> "This level of reduction is achievable in California. In fact, if California realizes the expected benefits of existing policy goals (such as 12,000 megawatts of renewable distributed generation by 2020, net zero energy homes after 2020, existing building retrofits under AB 758, and others) it could reduce emissions by 2030 to levels squarely in line with those needed in the developed world and to stay on track to reduce emissions to 80% below 1990 levels by 2050. Additional measures, including locally driven measures and those necessary to meet federal air quality standards in 2032, could lead to even greater emission reductions."

In other words, CARB believes that the state is on a trajectory to meet the 2030 and 2050 GHG reduction targets set forth in AB 32, SB 32, and EO S-3-05. This is confirmed in the Second Update, which states, "[t]his Plan draws from the experiences in developing and implementing previous plans to present a path to reaching California's 2030 GHG reduction target. The Plan is a package of economically viable and technologically feasible actions to not just keep California on track to achieve its 2030 target, but stay on track for a low- to zero-carbon economy by involving every part of the state" (CARB

2017). The Second Update also states that although "the Scoping Plan charts the path to achieving the 2030 GHG emissions reduction target, we also need momentum to propel us to the 2050 statewide GHG target (80% below 1990 levels). In developing this Scoping Plan, we considered what policies are needed to meet our mid-term and long-term goals" (CARB 2017).

As discussed previously, the project would be consistent with the City's CAP and CARB's 2017 Scoping Plan, and would not conflict with the state's trajectory toward meeting future GHG reductions. Since the specific path to compliance for the state in regards to the long-term goals would likely require development of technology or other changes that are not currently known or available, specific additional mitigation measures for the project would be speculative and cannot be identified at this time. With respect to future GHG targets under SB 32 and EO S-3-05, CARB made clear in its legal interpretation that it has the requisite authority to adopt whatever regulations are necessary, beyond the AB 32 horizon year of 2020, to meet SB 32's 40% reduction target by 2030 and EO S-3-05's 80% reduction target by 2050; this legal interpretation by an expert agency provides evidence that future regulations would be adopted to continue the state on its trajectory toward meeting these future GHG targets.

Based on the preceding considerations, the project would not conflict with an applicable plan, policy, or regulation adopted to reduce the emissions of GHGs, and no mitigation is required. This impact would be less than significant. No mitigation is required.

Mitigation: No mitigation measures are required.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☒	☐

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☒	☐

Comments:

(a) Less Than Significant Impact. A variety of hazardous substances and wastes would be stored, used, and generated during construction of the proposed project. These would include fuels for machinery and vehicles, new and used motor oils, and storage containers and applicators containing such materials. Accidental spills, leaks, fires, explosions or pressure releases involving hazardous materials represent a potential threat to human health and the environment if not properly treated. Accident prevention and containment are the responsibility of the construction contractors, and provisions to properly manage hazardous substances and wastes are typically included in construction specifications. Hazardous materials shall not be disposed of or released onto the ground, the underlying groundwater, or any surface water. Totally enclosed containment shall be provided for all trash. All construction waste, including trash and litter, garbage, other solid waste, petroleum products, and other potentially hazardous materials, shall be removed to a waste facility permitted to treat, store, or dispose of such materials. Adherence to the construction specifications and applicable federal, state, and local regulations regarding hazardous materials and hazardous waste, including disposal, would ensure that construction of the proposed project would not create a significant hazard to the public or the environment. Additionally, the proposed project would be required to comply with federal, state, and local health and safety laws, as well as implement the SWQMP, which will contain construction BMPs for handling hazardous materials. Construction of the proposed project would be required to comply with relevant federal, state, and local health and safety laws, which are intended to minimize health risk to the public associated with hazardous materials. In addition, the proposed project would implement the PDP SWQMP, which includes construction BMPs that minimize hazards from pollutants, such as requiring stockpiles and other sources of pollutants to be covered when the chance of rain occurs. With implementation of applicable health and safety law and the SWQMP, impacts related to hazardous materials during construction would be less than significant.

The project would operate as a self-storage facility with associated landscaping and facility maintenance; none of the proposed land uses are typically considered a source of hazardous materials. Hazardous materials would then be limited to private use of commercially available cleaning products, landscaping chemicals and fertilizers, and various other commercially available substances. Operation of the proposed project would be required to comply with relevant federal, state, and local health and safety laws, which are intended to minimize health risk to the public associated with hazardous materials. In addition, the proposed project would implement the PDP SWQMP, which includes structural BMPs that minimize ensure compliance with pollutant control requirements. Thus, impacts to the environment and the public related to the routine transport, use, or disposal of hazardous materials would be considered less than significant.

(b) Less Than Significant Impact. Refer to Response VIII(a). A variety of hazardous substances and wastes would be stored, used, and generated during construction of the proposed project. Accidental spills, leaks, fires, explosions, or pressure releases involving hazardous materials represent a potential threat to human health and the environment if not properly treated. Impacts related to hazardous materials during construction would be less than significant. The project would operate as a self-storage facility and would not typically be considered a source of hazardous materials. As such, impacts to the environment and the public related to the accidental release of hazardous materials from the site would be considered less than significant.

(c) No Impact. The proposed project is not within one-quarter mile of an existing or proposed school. The closest schools to the proposed project site are Eastlake KinderCare (0.4 miles), Learning Choice Academy (0.4 miles), and San Diego Medical College (0.35 miles). As such, the proposed 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, and no impact would occur.

(d) No Impact. A search was performed on the project site with a two-mile radius using the Department of Toxic Substances Control's (DTSC) EnviroStor and the State Water Resources Control Board's Geotracker. Multiple off-site locations were found to be included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. However, all sites had been previously investigated and no further action was required (DTSC 2019; State Water Resources Control Board 2015). No registered hazardous sites and no impact would occur.

(e) Less Than Significant Impact. The closest airport to the project site is the Brown Field Municipal Airport, which is approximately 5.1 miles to the south. However, the project site is not located within the airport's overflight zone, and Brown Field Airport operations would not result in any significant impacts to the proposed project (San Diego County Regional Airport Authority 2010).

(f) No Impact. The proposed project site is not located within the vicinity of a private airstrip. Therefore, no impacts would occur.

(g) Less Than Significant Impact. The proposed project would not impair implementation of or physically interfere with an adopted emergency response or evacuation plan. During construction activities, construction equipment staging areas would primarily be restricted to on-site locations, with the exception of construction associated with access improvements on Eastlake Drive. All construction within public roadways would not impeded access or

movement of emergency vehicles. As indicated in the City's General Plan, the nearest evacuation routes are East H Street and Otay Lakes Road, located just north and south of the project site respectively (City of Chula Vista 2005a). Therefore, impacts to emergency response and/or evacuation plans would be less than significant.

(h) Less Than Significant Impact. Wildland fires present a significant threat in the City. Areas in the City that are particularly susceptible to these fires, are designated as "very high hazard" areas as delineated on Figure 9-9 of the City's General Plan: Wildland Fire Hazard Map. Very High Hazard areas within the City are located south of the eastern portion of the Lower Otay Reservoir and south of Otay Lakes Road (City of Chula Vista 2005a). The proposed project is located in an area designated as "no designation." Additionally, the project site is located within a highly urbanized area of Chula Vista, and it is unlikely wildland fires would affect the project site. Therefore, impacts from wildland fires at the site due to the proposed project would be less than significant.

Mitigation: No mitigation measures are required.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Result in an increase in pollutant discharges to receiving waters (including impaired water bodies pursuant to the Clean Water Act Section 303(d) list), result in significant alteration of receiving water quality during or following construction, or violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? Result in a potentially significant adverse impact on groundwater quality?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, or place structures within a 100-year flood hazard area which would impede or redirect flood flows?	☐	☐	☒	☐
e) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
f) Create or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐

Comments:

Hunsaker & Associates prepared a Preliminary Drainage Study (Hunsaker & Associates 2018) and a Priority Development Project Storm Water Quality Management Plan (Hunsaker & Associates 2016) for the proposed project and they are included as reference herein. These reports are used to support the analysis included below.

(a) Less Than Significant Impact. Under the federal Clean Water Act, which establishes the National Pollutant Discharge Elimination System (NPDES), construction projects that involve the disturbance of 1 or more acres of soil are required to obtain coverage under the State Water Resources Control Board Construction General Permit. Construction activity subject to this permit includes clearing, grading, and disturbances to ground surfaces, such as stockpiling or excavation. The Construction General Permit requires the development and implementation of a SWPPP. The SWPPP would contain a site map(s) that depicts the location of stockpiles, staging areas, and the type and location of BMPs such as silt fencing, sandbag berms, and general good housekeeping methods intended to

prevent the off-site discharge of soil or construction materials in stormwater. In addition, a PDP SWQMP was prepared for the project, which provides BMPs to minimize the potentially negative project impacts on water quality. The PDP SWQMP includes sediment and erosion control BMPs, as well as BMPs for generation and storing of pollutants. With implementation of applicable federal, state, and local regulation; a SWPPP, the BMPs included in the PDP SWQMP, the project would result in a less than significant impact in relation to construction-related pollutant discharges.

Under project operations, compared to existing conditions, an increase in runoff would be experienced due to the increased imperviousness of the site. However, a detention basin at the southern project boundary is proposed to attenuate these peak flows, and would offset the increase by detaining runoff such that runoff is lowered below existing amounts. The basin would be equipped with biofiltration media and a perforated underdrain for water quality treatment and a riser designed to mitigate for peak flows. The PDP SWQMP includes operational and maintenance BMPs to minimize pollutant discharges, for example, all debris, trash, organics and sediments shall be transported to approved facilities for disposal in accordance with local and state requirements. Thus, with implementation of applicable laws and regulations and the PDP SWQMP, the project would not result in an increase in pollutant discharges to receiving waters, and impacts would be less than significant.

(b) Less Than Significant Impact. Groundwater was not encountered during field surveys of the project (Hunsaker & Associates 2018). A regional groundwater table is anticipated to be well below site elevations, however, a perched water table may occur. Perched groundwater may develop along the existing drainage course, located near the wester property line, due to seasonal storm water runoff, or year round irrigation. Perched groundwater may also develop along sandstone/claystone contacts, or the contact between fill and the underlying bedrock (GeoSoils 2016). The regional groundwater is estimated to be approximately 100 feet from the surface, thus the proposed project is not expected to encounter groundwater during construction activities (GeoSoils 2016). According to the PDP SWQMP, the infiltration rates evaluated on site are less than 0.5 inches per hour. To avoid increasing soil saturation onsite, infiltration from the proposed basin would migrate laterally, down gradient into the adjacent, off-site property (Hunsaker & Associates 2016). As this is an elevated, hillside project, groundwater is not anticipated to be encountered during construction of the project, and impacts would be less than significant.

Operation of the proposed project would not involve permanent pumping of groundwater, as no development or operational phase of the proposed project would require the direct use of groundwater supplies. As further discussed under Section XVII, Utilities and Service Systems, the storage facility is not expected to generate substantial wastewater once

operational, because the project's wastewater generation would be limited to the staff members (two employees). The proposed project would be serviced by the Sweetwater Authority, which procures water from the following four sources: (1) deep freshwater wells in National City, (2) local runoff in the Sweetwater River with subsequent at the Loveland Reservoir and Sweetwater Reservoir, (3) San Diego Formation Wells in the lower Sweetwater River basin, and (4) purchase of imported water delivered by the San Diego Water Authority and Metropolitan Water District (Sweetwater Authority 2018). Therefore, indirect usage of groundwater would not be significant. Although site development would result in an increase in runoff, the increase in runoff volume would be detained and offset via surface ponding and the proposed basin designated to address peak flow detention. The proposed project density would not alter the construction footprint, and would not substantially alter the regional percolation patterns once construction is complete. Impacts due to the proposed project would be less than significant.

(c) Less Than Significant Impact. As stated in the Preliminary Drainage Study, the project site is currently undeveloped and drains towards the south with an average slope of approximately 4.5%. A storm drain conveys runoff underneath the access road, east of the St. Germain Road cul-de-sac, and empties it just south of the road. This runoff continues south towards SR-125 where it then confluences with flows in Telegraph Canyon Creek (Hunsaker & Associates 2018).

Construction of the project requires the preparation and implementation of a SWPPP that would describes the methods used to minimize soil erosion on the site during construction, such as berms of gravel bags, and securing filter fabric on stock piles of construction materials with gravel bags or rocks. The PDP SWQMP also includes erosion BMPs that would be implemented during construction. As such, with implementation of geotechnical recommendations, and implementation of a SWPPP and the SWQMP, construction of the project would not substantially alter existing drainage or result in substantial erosion on- or off-site.

In developed conditions, surface flows from the site would be conveyed via the internal on-site storm drain towards the southern boundary of the project site. Peak flows would be routed through the proposed basin where flows would be treated and attenuated below the existing condition runoff amounts. Flows will be released downstream of the basin on the south side of the existing access road which connects St Germain Road with the tennis courts. Runoff from the unimproved areas within the SDGE easement will not be routed around the basin since those areas are not affected by the site design. The inlets throughout the site would be strategically located to collect site runoff and prevent street flooding. Table 11 below shows the calculated post-development flows from the site both before and after detention (Hunsaker & Associates 2018).

Table 11
Pre-Developed and Post-Develop Flows

	Pre-Developed		Post-Developed Without Detention		Post-Developed With Detention	
Location	*Area (acres)*	*Q100 (cfs)*	*Area (acres)*	*Q100 (cfs)*	*Area (acres)*	*Q100 (cfs)*
Southern Drainage Limit	25.6	55.33	25.6	66.76	25.6	51.86

Source: Hunsaker & Associates 2018
cfs= cubic feet per second

As shown in Table 11, compared to existing conditions, an increase in runoff was experienced due to the increased impervious of the site. However, the proposed infiltration basin will offset the increase by detaining runoff, such that it lowers runoff below existing amounts. Table 11 shows a reduction of about 3.47 cfs from the existing condition. Therefore, the proposed project can adequately convey the project runoff without adversely affecting downstream storm drain infrastructure. Thus, through implementation of the proposed detention basins, and compliance with the SWPPP and SWQMP, the proposed project would not result in substantial erosion or siltation on or off site. Impacts would be less than significant

(d) Less Than Significant Impact. Refer to Response IX(c). The proposed project would not alter the course of a stream or river, because there are no streams or rivers transecting any portion of the project site. According to FEMA Flood Map 06073C1938G, the project site is considered as Zone X, meaning the site has minimal flood hazard potential with 0.2% annual chance flood hazard (FEMA 2015). Additionally, the proposed project would not result in a change in the approved development footprint, and the project site is not within a 100-year flood hazard area (City of Chula Vista 2005a). Impacts would therefore be less than significant.

(e) No Impact. The project site is not located in or near an area identified as having a potential for flooding as delineated on Figure 9-8: Flood and Dam Inundation Hazards Map of the City's General Plan (City of Chula Vista 2005a). Therefore, the site is not at risk for inundation as a result of a failure of a levee or a dam, and no impact would occur.

(f) Less Than Significant Impact. Refer to Responses IX(c) and IX(d). Runoff from the proposed project would be conveyed via the internal on-site storm drain towards the southern boundary of the project. The inlets on-site would be strategically located to collect site runoff and prevent street flooding. Peak flows with be routed through the prosed infiltration basin, where they will be treated and released downstream of the basin on the south side if the existing access road (Hunsaker & Associates 2018). Compared to

existing conditions, an increase in runoff would be experienced due to the increased imperviousness of the site once constructed. However, a detention basin at the southern project boundary is proposed to attenuate these peak flows below the existing condition amounts, and would offset the increase by detaining runoff such that runoff is lowered below existing amounts. Therefore, the proposed project can adequately convey the project runoff without adversely affecting the downstream storm drain infrastructure. As such, the project would not create or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant.

Mitigation: No mitigation measures are required.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☒	☐	☐

Comments:

(a) No Impact. The proposed project would construct a self-storage facility on currently undeveloped land designated as Open Space. The project site is bound by existing residential homes to the west, SR-125 to the east, Eastlake Drive to the north, a relatively small (less than 5-acre) vacant parcel located to the north beyond Eastlake Drive, and recreational tennis courts to the south. SR-125 creates a barrier between the commercial uses to the east and the residential uses to the west. The proposed project would not be of the size or nature that could physically divide an established community. Further, the project site is located on previously graded and disturbed land. All project construction would take place on site, and would not divide the surrounding community. Therefore, no impact would occur.

(b) Less Than Significant Impact. The project site is currently designated under the Chula Vista General Plan as Open Space. The proposed project would also include amendments to the City of Chula Vista General Plan, Eastlake II General Development Plan (GDP), Sectional Plan Area (SPA), and Planned Community to reflect the land use designation from Open Space to a new land use, Business Center Warehouse-Storage District (BC-5).

Under the GDP amendment, the new BC-5 land use district would be intended as an area for self-storage facilities which serve the surrounding neighborhoods and business districts. As discussed in the General Plan, General Development Plan, Supplemental Sectional Planning Area, and Planned Community Amendments (Hunsaker & Associates 2018), BC-5 would require a maximum building height of 35 feet, and a public street setback of 20 feet. With approval of these amendments, the project site would be in accordance with the Eastlake II Planned Community Guidelines and General Plan. The project would be consistent with all applicable land use plans, policies, and regulations. Therefore, impacts would be less than significant.

(c) Less Than Significant with Mitigation Incorporated. As discussed in Section IV, Biological Resources, the proposed project design is consistent with the MSCP Subarea Plan through specific adherence to mitigation/conveyance requirements for Development Projects Outside of Covered Projects as defined in the City MSCP Subarea Plan, as well as implementation of required mitigation measures. As noted in Section 1.3.1, the project area is located within the Development Area of the City Planning Component as identified in the Subarea Plan and as such has not been identified as a strategic preserve area within the City nor is it located within a designated conservation area. Further, the project area is located approximately 0.75-mile east of the nearest Conservation Area, and therefore, the proposed project would not impact the goals and objectives of the City's Subarea Plan.

Mitigation: Refer to Section IV, Biological Resources.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. MINERAL RESOURCES. Would the project:				
a) 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?	☐	☐	☐	☒
b) 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?	☐	☐	☐	☒

Comments:

(a) No Impact. Mineral resources in Chula Vista are described in the Environmental Element of the City's General Plan. Mineral Resource Zones (MRZs) are delineated in Figure 9-4: MRZ-2 Area Map (City of Chula Vista 2005a). Mineral resources located within the City include sand, gravel, crushed rock resources, known collectively as construction aggregate. Construction aggregate is a valued resource considering the reduction in construction costs this resource provides, particularly for construction areas in proximity to the aggregate (City of Chula Vista 2005a). The proposed project site is not located within an MRZ, nor is it located on or within any areas containing mineral resources as indicated in the City's General Plan. The nearest MRZ is the Otay Quarry, which is located approximately 3.4 miles southwest of the project site. Additionally, the project site is not currently being used for mineral resource extraction. Given these factors, the proposed project would not result in the loss of availability of a known mineral resource that would be of future value to the region and the residents of the State. No impact would result.

(b) No Impact. See Response X(a). The proposed project site is not designated as an important mineral resource site, as indicated in Figure 9-4 of the City's General Plan (City of Chula Vista 2005a). Therefore, no impact would result.

Mitigation: No mitigation measures are required.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. NOISE. Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☒	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

A Noise Impact Assessment was prepared by Dudek for the proposed project and are included as reference herein (Dudek 2019c). This report is used to support the analysis included below.

Comments:

(a) Less Than Significant with Mitigation Incorporated. Two noise measurements were conducted at the site to determine the existing noise levels. The short-term noise measurements were conducted on Friday, June 22, 2012, at two locations in the vicinity of the project site[2]. The study area and noise measurement locations are shown on Figure 13. The measured average noise level was 63 decibels (dB) at Location 1 (along Eastlake Drive), and 59 dB at Location 2 (eastern edge of project site, fronting SR-125). The measured average noise levels and the concurrent traffic volumes are presented in Table 12. It is important to note that these short-term sound level measurements and manual traffic counts were performed in order to calibrate the noise model used to predict traffic related noise from future traffic volumes along these roadways. Because the roadway configurations have not been altered since the 2012 measurements were performed, the data remains valid for noise modeling purposes.

Table 12
Measured Noise Levels and Traffic Volumes

Site	Description	Date Time	L_{eq}[1]	Cars	MT[2]	HT[3]
1	Approximately 45 feet from the center line of Eastlake Drive	6/22/2012 1:00 p.m. to 1:20 p.m.	63 dB	273	0	0
2	Approximately 275 feet from the center line of SR-125	6/22/2012 1:30 p.m. to 1:50 p.m.	59 dB	424	1	3

Source: Dudek 2019c
1 Equivalent continuous sound level (time-average sound level).
2 Medium trucks.
3 Heavy trucks.

Noise Sensitive Receptors

A row of residential properties exists adjacent to the proposed project site. Two tennis courts also exist south of the project site. Table 13 summarizes important distances to these residential uses and other nearby noise sensitive land uses.

2 The project vicinity is generally built out and has not experienced much change, therefore, the noise measurements would still be valid.

Table 13
Distances to Nearby Noise Sensitive Receptors

Description of Path and Receiver	Distance
Proposed project entry route (at north west corner of project site) to nearest residence	65 feet
SDG&E easement width	120 feet
Approximate center of project site to nearest residential property to the west	240 feet
Southern site boundary to existing tennis courts to the south	63 feet

Source: Dudek 2019c

In addition to these off-site receptors, the site will include a leasing office that is also a noise sensitive receptor. Based on the orientation of the leasing office, Eastlake Drive is the primary noise source of concern for this noise sensitive receptor.

Construction Noise

The City Noise Ordinance (Municipal Code, Section 19.68) (City of Chula Vista 1985) contains regulations restricting land use–related noise-generating activities and operations to avoid noise nuisance in the community. These standards typically apply to stationary sources such as noise from mechanical equipment (including mechanical ventilation and air condition noise, and pool pump noise) or event noise, as opposed to traffic noise. The property-line noise standards are presented in Table 14. Construction and demolition are listed as exempt activities from the noise regulation limits when work hours do not occur between 10 p.m. and 7:00 a.m., Monday through Friday, or between 10 p.m. and 8:00 a.m., Saturday and Sunday.

Table 14
City of Chula Vista Exterior Property-Line Noise Limits

Receiving Land Use Category	Noise Level (dB(A))	
	10 p.m. to 7 a.m. (Weekdays)	*7 a.m. to 10 p.m. (Weekdays)*
	10 p.m. to 8 a.m. (Weekends)	*8 a.m. to 10 p.m. (Weekends)*
All residential (except multiple dwelling)	45	55
Multiple dwelling residential	50	60
Commercial	60	65
Light industry – I-R and I-L zone	70	70
Heavy industry – I zone	80	80

Note: dBA = A-weighted decibels
Source: Dudek 2019c

The construction activities for the proposed project would include site preparation, grading, building construction, paving, and architectural finishing. Details on the phases of construction and the expected equipment were not available. Assumptions were based on the CalEEMod Version 2016.3.2, using the estimated worst-case day occurring over the construction period. Construction equipment, vendor trips, and construction worker trips, broken out by construction phase, are summarized in the Project Description. Equipment operates in alternating cycles of full power and low power, thus producing noise levels less than the maximum level. The average sound level of construction activity also depends on the amount of time that the equipment operates and the intensity of the construction during that time period.

Using the assumptions provided in the Project Description regarding equipment fleet composition for each construction phase, and distance to the nearest receptor, construction noise was modelled using the Federal Highway Administration Roadway Construction Noise Model (RCNM). The results of the on-site construction noise analysis are summarized in Table 15; on-site construction activities would be generally located approximately 240 feet from the nearest residential properties. The input/output results of the RCNM modeling are included in the Noise Impact Assessment (Dudek 2019c). For this analysis, it was assumed that heavy construction equipment would be used 5 days a week during project construction.

Table 15
Construction Noise

Construction Phase	Modeled Equipment	Quantity	Calculated L_{eq} @ 240 feet
Site preparation	Rubber-tired dozers	3	73 dBA
	Tractors	2	
	Loaders	1	
	Backhoes	1	
Grading	Excavators	1	72 dBA
	Graders	1	
	Tractors	1	
	Loaders	1	
	Backhoes	1	
Building construction	Cranes	1	66 dBA
	Forklifts	3	
	Welders	1	
Paving	Pavers	2	73 dBA
	Other paving equipment	2	
	Rollers	2	
Architectural finishing	Air compressors	1	60 dBA

Note: L_{eq} = equivalent continuous sound level; dBA = A-weighted decibels.

As illustrated in Table 15, average noise levels during construction would be anticipated to be in the 72 to 73 A-weighted decibel (dBA) range for site preparation, grading, and paving phases. Given an ambient noise level of approximately 65 dBA, construction noise would be clearly audible over background noise levels, and could at times represent an annoyance to residents. Consequently, while local noise regulations exempt construction activities, the increase in temporary noise levels caused by project construction would be considered a potentially significant impact.

In addition to on-site construction equipment operation (as assessed with RCNM, and presented in Table 15), noise from worker trips, hauling (i.e., dump trucks) and vendor trucks (i.e., delivery trucks) were estimated. Haul truck trips were assumed to be required during the grading phases. It was assumed that grading would require 10 cubic yard haul trucks. Vendor trucks transporting concrete, steel, and other building materials were assumed during the building construction, paving, and architectural finishing phases.

These truck trips to and from the site also pose a potential noise nuisance for the nearby residences. The distance from the site entry road to the nearest residences is only 65 feet. At 65 feet, truck noise levels are expected to be approximately 86 dBA during brief pass-by events. These construction noise levels associated with haul trucks and vendor delivery trucks are considered potentially significant. Although construction and vibration are temporary phenomena and very day to day, depending on the equipment in use, implementation of **MM-NOI-1** would reduce potentially significant construction-related noise impacts to a level below significance.

Operational Noise

The leasing office is expected to have heating and air conditioning provided by mechanical equipment in the vicinity of the office. No other mechanical equipment is currently planned for the site. The inlet and exhaust for the leasing office mechanical equipment will be oriented facing SR-125 (away from the residential area). Dudek reviewed sound level data for three small HVAC units that might be appropriate for the leasing space (Dudek 2019c). Based on the data reported in the technical sheets for these models, Dudek calculated expected sound pressure levels at the nearest residential receiver. The calculated sound pressure levels were below 35 dBA in the back yards of the residences. Based on these calculated levels, the mechanical noise is expected to result in a less than significant impact.

Traffic Noise Impact

Eastlake Drive and SR-125 are the primary noise sources in the vicinity of the project. Based on the SANDAG Series 12 traffic model, the existing (2020) average weekday traffic (AWT) volume along SR-125 going both directions is approximately 18,100 AWT (SANDAG 2012). The projected existing (2020) AWT volume along Eastlake Drive adjacent to the project site is approximately 7,400 AWT (SANDAG 2012). The existing average daily traffic (ADT) volume along Eastlake Drive adjacent to the project site is approximately 11,053 ADT (LOS Engineering 2019).

The project would generate approximately 317 Average Daily Trips (ADT) and would increase the traffic along nearby roads including Eastlake Parkway (LOS Engineering 2019). The existing ADT volume along Eastlake Drive adjacent to the project site is approximately 11,053 ADT (LOS Engineering 2019). The projected existing (2020) AWT volume along Eastlake Drive adjacent to the project site is approximately 7,400 AWT (SANDAG 2012). Focusing on the smaller traffic volume statistic (AWT), will allow for a conservative calculation of the noise impact. Based on the SANDAG 7,400 AWT value, the project would increase the traffic on Eastlake Parkway by less than 4%.

Therefore, substantial trip generation would not be associated with the proposed project. In order to increase traffic noise levels by 3 dBA, a doubling in the ADT count on the affected road is necessary (Dudek 2019c). The project is not expected to double the existing average daily traffic volumes on any vicinity roads. The 4% increase in traffic caused by the proposed project is expected to increase the traffic noise by less than 1 dB. In conclusion, the project would have a less than significant noise impact associated with potential project traffic generation.

(b) Less Than Significant Impact. Operations of the project would not have the potential to generate long-term groundborne vibration or noise. Ground vibrations from construction activities do not often reach the levels that can damage structures or affect activities that are not vibration-sensitive, although the vibrations may be felt by nearby persons in close proximity and result in annoyance (Dudek 2019c). As a guide, major construction activity within 200 feet and pile driving within 600 feet may be potentially disruptive to sensitive operations (Dudek 2019c). The project construction activity would not include pile driving. In addition, there are no vibration sensitive structures or land uses located within 200 feet of the construction zone. Consequently, groundborne vibration impacts would be less than significant.

(c) Less Than Significant Impact. Refer to response XII(a) regarding operational noise. The 4% increase in traffic caused by the proposed project is expected to increase the traffic noise by less than 1 dB. The project, once operational, would not otherwise contain uses that would be substantial sources of permanent noise. Impacts would be less than significant.

(d) Less Than Significant with Mitigation Incorporated. As discussed above, the project would have the potential to temporarily exceed ambient noise levels during construction. Implementation of **MM-NOI-1** would reduce these temporary noise impacts to a level below significance.

(e) Less Than Significant Impact. Brown Field Municipal Airport is located approximately 5.1 miles to the south of the project site. The airport accommodates both general aviation aircraft and military aircraft. The proposed project site does not fall within the Airport Influence Area and the 60 dB community noise equivalent level noise contour (San Diego County Airport Land Use Commission 2010). Therefore, impacts would be less than significant.

(f) No Impact. The proposed project is not located within the vicinity of a private airstrip. No impacts would result.

Mitigation:

MM-NOI-1 The following noise measures shall be included in construction plans prior to the start of construction to the satisfaction of the City of Chula Vista:

- Construction equipment shall be properly outfitted and maintained with feasible noise-reduction devices to minimize construction-generated noise.
- Stationary noise sources such as generators or pumps shall be located as far away from noise-sensitive land uses as feasible.
- Laydown and construction vehicle staging areas shall be located as far away from noise-sensitive land uses as feasible.
- Whenever possible, residential areas that would be subject to construction noise or vibration shall be informed 1 week before the start of each construction phase.
- Electrically powered equipment shall be used instead of pneumatic or internal combustion powered equipment, where feasible.

- Construction site and access road speed limits shall be established and enforced during the construction period.
- The use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only.
- Construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow surrounding property owners to contact the job superintendent. The on-site construction supervisor shall have the responsibility and authority to receive and resolve noise complaints.
- Equipment shall not be left idling unless necessary.
- The project contractor shall, to the extent feasible, schedule construction activities to minimize the simultaneous operation of construction equipment so as to reduce noise levels resulting from operating several pieces of high-noise-level equipment at the same time.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. POPULATION AND HOUSING. Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of road or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Comments:

(a) Less Than Significant Impact. Because of the temporary nature of construction activities, it is assumed the project construction workers would come from the local labor pool, or commute from the San Diego region. As such, it is not anticipated that people would relocate into the City as a result of construction of the proposed project.

Once operational, the proposed project would not directly induce substantial population growth in an area because no residential uses or other population-inducing land uses are proposed on site. In addition, the storage facility is not expected to generate substantial water, wastewater, or other utilities, once operational, because the project's demand for these service systems would be limited to the staff members (maximum of two employees; one manager and one security guard). As discussed further in Section XVII, Utilities and Service Systems, the proposed project would not expand existing utilities, infrastructure, or roadways in a way that would allow or encourage population growth, as the proposed utilities and infrastructure would only allow for the increased demand from the proposed project. Additionally, the employees hired to operate the proposed storage facility would likely come from the local labor pool. As such, it is not anticipated that people would relocate into the City as a result of the proposed project. Thus, the proposed

project would not indirectly induce population growth. Therefore, less than significant impacts associated with population growth inducement would occur.

(b) No Impact. The project site currently consists of a vacant parcel of land. Thus, the project would not displace substantial numbers of existing housing. No impact would result.

(c) No Impact. The proposed project would not displace existing housing or result in the displacement of existing residents and thus would not necessitate the construction of replacement housing elsewhere. No impact would result.

Mitigation: No mitigation measures are required.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. PUBLIC SERVICES. Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any public services:				
i. Fire protection?	☐	☐	☒	☐
ii. Police protection?	☐	☐	☒	☐
iii. Schools?	☐	☐	☐	☒
iv. Parks?	☐	☐	☐	☒
v. Other public facilities?	☐	☐	☐	☒

Comments:

(a)

(i) Less than Significant Impact. The proposed project site would be served by the Chula Vista Fire Department (CVFD), which has nine fire stations and approximately 120 personnel (City of Chula Vista 2017). As part of standard development practices, prior to construction, project plans would be reviewed by the CVFD, and the project would be required to incorporate the CVFD's recommendations into the final project design. The CVFD review and approval of plans would ensure that the project complies with the California Fire Code (24 CCR, Part 9). The project applicant would be required to install fire safety devices, such as fire alarms and sprinklers, in order to improve emergency-related problems for the proposed development. Zoned fire sprinkler systems would be installed throughout the buildings. The project is subject

to the payment of a development impact fee (DIF) related to fire protection. The project DIF amount for fire protection facility fees is determined based on the City's Master Fee Schedule. The payment of these fees would provide funding for capital improvements such as land, equipment purchases, and fire station construction.

Operations of the proposed project would involve the development of a self-storage facility, which would require a maximum of four operational staff once constructed. Implementation of the project would not directly or indirectly induce population growth, and the development of a storage facility would not result in a substantially increased demand for fire protection services. Therefore, impacts associated with fire protection would be less than significant.

(ii) Less than Significant Impact. The proposed project site would be served by the Chula Vista Police Department (CVPD), who currently employ approximately 232 sworn officers (City of Chula Vista 2017). The project is subject to the payment of a development impact fee (DIF) related to police services. The project DIF amount for police protection facility fees is determined based on the City's Master Fee Schedule. The payment of these fees would provide funding for capital improvements for police services. Project construction could result in additional enforcement calls and emergency responses to this location but is not anticipated to increase the overall demand for law enforcement personnel and services in the project area such that new or improved facilities would be required. In fiscal year 2016, the CVPD received 67,048 calls, and delivered an average response time of 6 minutes and 31 seconds (City of Chula Vista 2017). Considering the call volume the CVPD, any calls as a result of the proposed project would be minimal and would not substantially alter performance standards for the CVPD.

The proposed project would involve development of a self-storage facility. A maximum of four operational staff members would be necessary upon project completion, and staff would be minimal and intermittent. Additionally, project construction could result in additional enforcement calls and emergency responses to this location but is not anticipated to increase the overall demand for law enforcement personnel and services in the project area such that new or improved facilities would be required. Therefore, implementation of the proposed project would not directly or indirectly induce population growth, and would not result in a substantially increased demand for police protection services. Therefore, impacts associated with police protection would be less than significant.

(iii) **No Impact.** As previously discussed, the proposed project would not directly or indirectly result in an increase in population. Construction and operational workers would come from the local labor pool, or commute from the San Diego region. As such, it is not anticipated that people would relocate into the City as a result of construction of the proposed project. As such, the proposed project would not substantially increase enrollment at schools. Therefore, no impacts associated with schools would occur.

(iv) **(iv)No Impact.** The proposed storage facility would not introduce any new residents to the area, and thus use of parks is not anticipated to increase as a result of the project. Construction and operational workers would come from the local labor pool, or commute from the San Diego region. As such, it is not anticipated that people would relocate into the City as a result of construction of the proposed project. Therefore, the project would not result in a substantial increase in demand on parks, or create adverse physical impacts to parks, and no impact would occur.

(v) **No Impact.** As previously discussed, the proposed project would not directly or indirectly result in an increase in population. As such, the proposed project would not increase enrollment at schools, or patronage at parks, libraries, or other public facilities. Therefore, no impacts associated with libraries would occur.

Mitigation: No mitigation measures required.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. RECREATION. Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which have an adverse physical effect on the environment?	☐	☐	☐	☒

Comments:

(a) No Impact. The proposed storage facility would not result in direct or indirect population growth. Construction and operational workers would come from the local labor pool, or commute from the San Diego region. As such, it is not anticipated that people would relocate into the City as a result of construction of the proposed project. Therefore the project would not be expected to cause any substantial physical deterioration to nearby recreational facilities. Therefore, no increased usage of existing neighborhoods, regional parks, or other recreational facilities is expected to occur as a result of the project, and no impact would occur.

(b) No Impact. The proposed project would consist of a storage facility, and does not include any recreational facilities. The proposed project would not introduce a new population to the area and thus would not require construction or expansion of recreational facilities. As such, no impact would occur.

Mitigation: No mitigation measures are required.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. TRANSPORTATION/TRAFFIC. Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☒	☐
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☒	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
e) Result in inadequate emergency access?	☐	☐	☒	☐
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☒	☐

Comments:

A Traffic Analysis Letter was prepared by LOS Engineering Inc., in March 2019, and is included as reference herein. The analysis contained in this section is based on the findings of the Traffic Analysis Letter (LOS Engineering Inc. 2019a) and the Parking Analysis (LOS Engineering Inc. 2019b).

(a) Less Than Significant Impact. The proposed storage facility is not expected to substantially increase traffic in the area, because only two employees would be necessary for operation. Using SANDAG trip generation rates, the project is calculated to generate 317 daily trips, 26 AM peak hour trips and 25 PM peak hour trips (LOS Engineering Inc. 2019a). Based on the SANDAG CMP guidelines, a traffic impact study is not required for the project because the project's trip generation is calculated to generate less than 500 ADT and less than 50 peak hour trips. As such, project trips would not result in a substantial increase of daily trips on the adjacent roadway network and would not result in the deterioration of the performance of existing roadways. The proposed project would conform with all applicable plans, ordinances and policies establishing measures of effectiveness for the performance of the circulation system. Impacts would be less than significant.

(b) Less Than Significant Impact. Refer to Response XVI(a). The proposed project would not substantially contribute to the average daily traffic of the adjacent roadway network. Impacts would be less than significant.

(c) No Impact. The nearest airport to the project site is the Brown Field Municipal Airport, located approximately 5.1 miles to the south. Furthermore, the project would be constructed in accordance with all building requirements and would be similar in elevation as the surrounding businesses and residences. The proposed project would not have any features that could disrupt existing air traffic patterns. Additionally, the site is not located within the Airport Influence Area (San Diego County Regional Airport Authority 2010). Therefore, the project would not result in a change in air traffic patterns, and no impact would occur.

(d) Less Than Significant Impact. The project main access is proposed soley to Eastlake Parkway through an existing driveway on the north side of the project. A secondary emergency only access is on the south side of the project through an existing and gated service road to St. Germain Road. The secondary emergency only access will not be used by non-emergency project traffic (LOS Engineering Inc. 2019a). As part of the project, it is proposed that the existing center raised median on Eastlake Parkway from Ridgewater Drive to the eastern edge of the project driveway be reconstructed with a median break to allow full

access for most vehicles and left in and right out for large trucks. Additionally, the existing median east of the project driveway will be rebuilt to include a left turn pocket into the project driveway. For on-site circulation, a paved roadway will provide access to two on-site driveways for the two self-storage buildings and one driveway to the RV/boat storage yard. Therefore, the proposed project would not involve any design features or incompatible uses that would increase hazards within the project area. Access points to and from the project site would be designed to be consistent with the City's circulation standards, and would not create a hazard for vehicles, bicycles, or pedestrians. Access would be adequate for wide turning radii of large vehicles entering and exiting the site, such as storage trailers, RVs, and vehicles towing boats. For these reasons, the project would have a less than significant impact related to design hazards or incompatible uses.

(e) Less Than Significant Impact. During construction activities, construction equipment staging areas would primarily be restricted to on-site locations, with the exception of construction associated with access improvements on Eastlake Drive. All construction within public roadways would not impeded access or movement of emergency vehicles. As indicated in the City's General Plan, the nearest evacuation route East H Street and Otay Lakes Road, located just north and south of the project site respectively (City of Chula Vista 2005a).

As previously stated, aaccess is proposed solely to Eastlake Drive through an existing driveway. As part of the project, the on-site circulation will connect with the existing and gated access to St. Germain Road; however, this access will remain gated for power-line service and emergency vehicles only. Further, the proposed project would be required to comply with Fire Department requirements and standards to ensure that adequate access is provided. The proposed project would not involve the permanent closure of any surface streets that would increase the response time for emergency services. The project will comply with all fire codes, and emergency access will be maintained by foot and by truck. Therefore, impacts to emergency access would be less than significant.

(f) Less Than Significant Impact. The proposed project would not affect planned alternative transportation routes or modes, nor would it conflict with adopted policies, plans, and programs supporting alternative transportation. Implementation of the proposed project would result in a less than significant impact.

Mitigation: No mitigation measures are required.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐

Comments:

(a) Less Than Significant Impact. According to the City of Chula Vista's Wastewater Master Plan, the City is responsible for maintenance, operations and management of all wastewater and sewer collection systems that transport flows generated within the City (City of Chula Vista 2014). The City maintains nearly 500 miles of sewer main lines and 12 wastewater lift stations. Flows are ultimately conveyed to transmission and treatment facilities operated by the City of San Diego's Metropolitan Wastewater Department (METRO). Currently the City owns capacity rights of 20.864 million gallons per day (mgd) within the METRO system. The proposed project would be required to pay the City-enforced wastewater capacity fee which would either help fund the purchase of additional capacity in the Point Loma Wastewater Treatment Plan or construct City-owned treatment facilities in the next 10 year. Alternately, the City could elect to maintain its current treatment rights in the Metro system and construct its own recycled water treatment plant to treat the build-out flows of new customers. (City of Chula Vista 2014).

As discussed in Section XIII Population and Housing, the proposed project would not introduce a new population to the area or any residential units. Construction and operational workers would come from the local labor pool, or commute from the San Diego region. As such, it is not anticipated that people would relocate into the City as a result of construction of the proposed project. The storage facility is not expected to generate substantial wastewater once operational, as the project's wastewater generation would be limited to the staff members (maximum of two employees as any given time). Impacts would be less than significant.

(b) Less Than Significant Impact. The proposed project would not introduce a new population to the area or any residential units. The storage facility is not expected to generate substantial wastewater once operational, because the project's wastewater generation would be limited to the staff members (maximum two employees). The proposed project would be serviced by the Sweetwater Authority, which procures water from the following four sources: (1) deep freshwater wells in National City, (2) local runoff in the Sweetwater River with subsequent at the Loveland Reservoir and Sweetwater Reservoir, (3) San Diego Formation Wells in the lower Sweetwater River basin, and (4) purchase of imported water delivered by the San Diego Water Authority and Metropolitan Water District (Sweetwater Authority 2018). The proposed project would include private connections to existing water and wastewater lines adjacent to the project site. Improvements would be limited to extension or rerouting of pipes and sewer lines to the project site. Water and wastewater capacity fees would be due and collected at the issuance of building permits. Therefore, the proposed project would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities that would cause significant environmental effects. Impacts would be less than significant.

(c) Less Than Significant Impact. The proposed project includes new stormwater drainage facilities, including an on-site detention basin. The drainage system is a portion of the proposed project, the environmental effects of which are analyzed throughout this document. The development of the on-site drainage facilities would not result in any additional impacts beyond those disclosed throughout this document. Impacts would be less than significant.

(d) Less Than Significant Impact. As stated in response XVII(b), the proposed project would be serviced by the Sweetwater Authority, which procures water from the following four sources: (1) deep freshwater wells in National City, (2) local runoff in the Sweetwater River with subsequent at the Loveland Reservoir and Sweetwater Reservoir, (3) San Diego Formation Wells in the lower Sweetwater River basin, and (4) purchase of imported water delivered by the San Diego Water Authority and Metropolitan Water District (Sweetwater Authority 2018). The proposed project would not result in a substantial demand of water supplies, as demand would be limited to the facility's two employees once operational. The landscaped areas would not consist of water-intensive plant species. Impacts would be less than significant.

(e) Less Than Significant Impact. Refer to response XVII(a). The proposed project would not introduce a new population to the area or any residential units. The storage facility is not expected to generate substantial wastewater once operational, because the project's wastewater generation would be limited to the staff members (maximum two employees). Impacts would be less than significant.

(f) Less Than Significant Impact. The proposed project site is anticipated to be served by the Otay Landfill, which has a remaining capacity of approximately 21.1 million cubic yards (CalRecycle 2017). The City of Chula Vista General Plan EIR anticipates that the Otay Landfill would be in operation until 2030 based upon current waste generation rates. Once operational, solid waste generated by the proposed project would be limited to the two employees on site as well as the intermittent users of the facility. As such, there would not be substantial solid waste produced once operational, and the Otay Landfill would have adequate permitted capacity to accommodate the project's solid waste disposal needs. Impacts would be less than significant.

(g) Less Than Significant Impact. Anticipated uses on the project site would not violate any federal, state, or local statutes or regulations related to solid waste. In addition, the SWQMP prepared for the proposed project includes additional BMPs related to the management of solid wastes. Thus, impacts would be less than significant.

Mitigation: No mitigation measures are required.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. THRESHOLDS Will the proposal adversely impact the City's Threshold Standards?				
a) Library The City shall construct 60,000 gross square feet (GSF) of additional library space, over the June 30, 2000 GSF total, in the area east of Interstate 805 by buildout. The construction of said facilities shall be phased such that the City will not fall below the city-wide ratio of 500 GSF per 1,000 population. Library facilities are to be adequately equipped and staffed.	☐	☐	☐	☒
b) Police				
i. Emergency Response: Properly equipped and staffed police units shall respond to 81% of "Priority One" emergency calls within seven (7) minutes and maintain an average response time to all "Priority One" emergency calls of 5.5 minutes or less.	☐	☐	☒	☐
ii. Respond to 57% of "Priority Two" urgent calls within seven (7) minutes and maintain an average response time to all "Priority Two" calls of 7.5 minutes or less.	☐	☐	☒	☐

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Fire and Emergency Medical				
Emergency response: Properly equipped and staffed fire and medical units shall respond to calls throughout the City within 7 minutes in 80% of the cases (measured annually).	☐	☐	☒	☐
d) Traffic				
The Threshold Standards require that all intersections must operate at a Level of Service (LOS) "C"" or better, with the exception that Level of Service (LOS) "D" may occur during the peak two hours of the day at signalized intersections. Signalized intersections west of I-805 are not to operate at a LOS below their 1991 LOS. No intersection may reach LOS "E" or "F" during the average weekday peak hour. Intersections of arterials with freeway ramps are exempted from this Standard.	☐	☐	☒	☐
e) Parks and Recreation Areas				
The Threshold Standard for Parks and Recreation is 3 acres of neighborhood and community parkland with appropriate facilities/1,000 population east of I-805.	☐	☐	☐	☒

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Drainage The Threshold Standards require that storm water flows and volumes not exceed City Engineering Standards. Individual projects will provide necessary improvements consistent with the Drainage Master Plan(s) and City Engineering Standards.	☐	☐	☒	☐
g) Sewer The Threshold Standards require that sewage flows and volumes not exceed City Engineering Standards. Individual projects will provide necessary improvements consistent with Sewer Master Plan(s) and City Engineering Standards.	☐	☐	☒	☐
h) Water The Threshold Standards require that adequate storage, treatment, and transmission facilities are constructed concurrently with planned growth and that water quality standards are not jeopardized during growth and construction.	☐	☐	☒	☐

Applicants may also be required to participate in whatever water conservation or fee off-set program the City of Chula Vista has in effect at the time of building permit issuance.

Comments:

Refer to discussions above.

Mitigation: No mitigation measures are required.

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below 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?	☐	☒	☐	☐
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 project, and the effects of probable future projects.)	☐	☒	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Comments:

(a) Less Than Significant with Mitigation Incorporated. As discussed in Section IV, Biological Resources, construction of the proposed project would potentially result in significant impacts to biological resources. However, with incorporation of **MM-BIO-1** through **MM-BIO-4**, all potentially significant impacts would be reduced to a level below significance. The proposed project would not substantially degrade the quality of the environment, impact fish or wildlife species, or plant communities. As

discussed in Section V, Cultural Resources, potential impacts regarding inadvertent discovery of cultural and paleontological resources could occur during excavation. However, implementation of **MM-CUL-1** and **MM-CUL-2** would ensure that impacts would be less than significant. Overall, impacts would be less than significant with the incorporation of mitigation.

(b) Less Than Significant Impact with Mitigation Incorporated. As provided in the analysis presented above, the proposed project would not result in significant impacts to aesthetics, agriculture and forestry resources, air quality, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, population and housing, public services, recreation, transportation and traffic, and utilities and service systems. Mitigation measures recommended for biological resources, cultural resources, and noise would reduce impacts to below a level of significance.

The proposed project would incrementally contribute to cumulative impacts for projects occurring within the City. With mitigation, however, implementation of the proposed project would not result in any residually significant impacts that could contribute to a cumulative impact. In the absence of residually significant impacts, the incremental accumulation of effects would not be cumulatively considerable and would be less than significant.

(c) Less Than Significant Impact with Mitigation Incorporated. Based on the analysis above, it has been determined that there would be no significant direct or indirect effect on human beings with the incorporation of mitigation.

Mitigation: Refer to mitigation measures listed above.

XX. PROJECT REVISIONS OR MITIGATION MEASURES

Project mitigation measures are indicated above.

XXI. AGREEMENT TO IMPLEMENT MITIGATION MEASURES

By signing the line(s) provided below, the Applicant(s) and/or Operator(s) stipulate that they have each read, understood and have their respective company's authority to and do agree to the mitigation measures contained herein, and will implement same to the satisfaction of the Environmental Review Coordinator. Failure to sign the line(s) provided below shall indicate the Applicants' and/or Operator's desire that the Project be held in abeyance without approval.

_____

Printed Name and Title of Authorized Representative of
[Property Owner's Name]

_____ _____

Signature of Authorized Representative of Date
[Property Owner's Name]

_____

Printed Name and Title of
[Operator if different from Property Owner]

_____ _____

Signature of Authorized Representative of Date
[Operator if different from Property Owner]

XXII. 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" or "Less Than Significant with Mitigation Incorporated" as indicated by the checklist on the previous pages.

☒ Land Use and Planning	☐ Transportation/Traffic	☐ Public Services
☐ Population and Housing	☒Biological Resources	☐ Utilities and Service Systems
☐ Geophysical	☐ Energy and Mineral Resources	☐ Aesthetics
☐ Agricultural Resources		
☐ Hydrology/Water	☐ Hazards and Hazardous Materials	☒ Cultural Resources
☐Air Quality	☒ Noise	☐ Recreation
☐ Threshold Standards	☒ Mandatory Findings of Significance	

XXIII. DETERMINATION:

On the basis of this initial evaluation:

I find that the proposed project **could not** have a significant effect on the environment, and a **Negative Declaration** will be prepared. ☐

I find that 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 or agreed to by the project proponent. A **Mitigated Negative Declaration** will be prepared. ☒

I find that the proposed project **may** have a significant effect on the environment, and an **Environmental Impact Report** is required. ☐

I find that the proposed project **may** have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **Environmental Impact Report** is required, but it must analyze only the effects that remain to be addressed. ☐

I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier **EIR** or **Negative Declaration** pursuant to applicable standards and (b) have been avoided or mitigated pursuant to that earlier **EIR** or **Negative Declaration**, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required. ☐

_____ _____

Jeff Steichen Date
Associate Planner
City of Chula Vista

XXIV. REFERENCES

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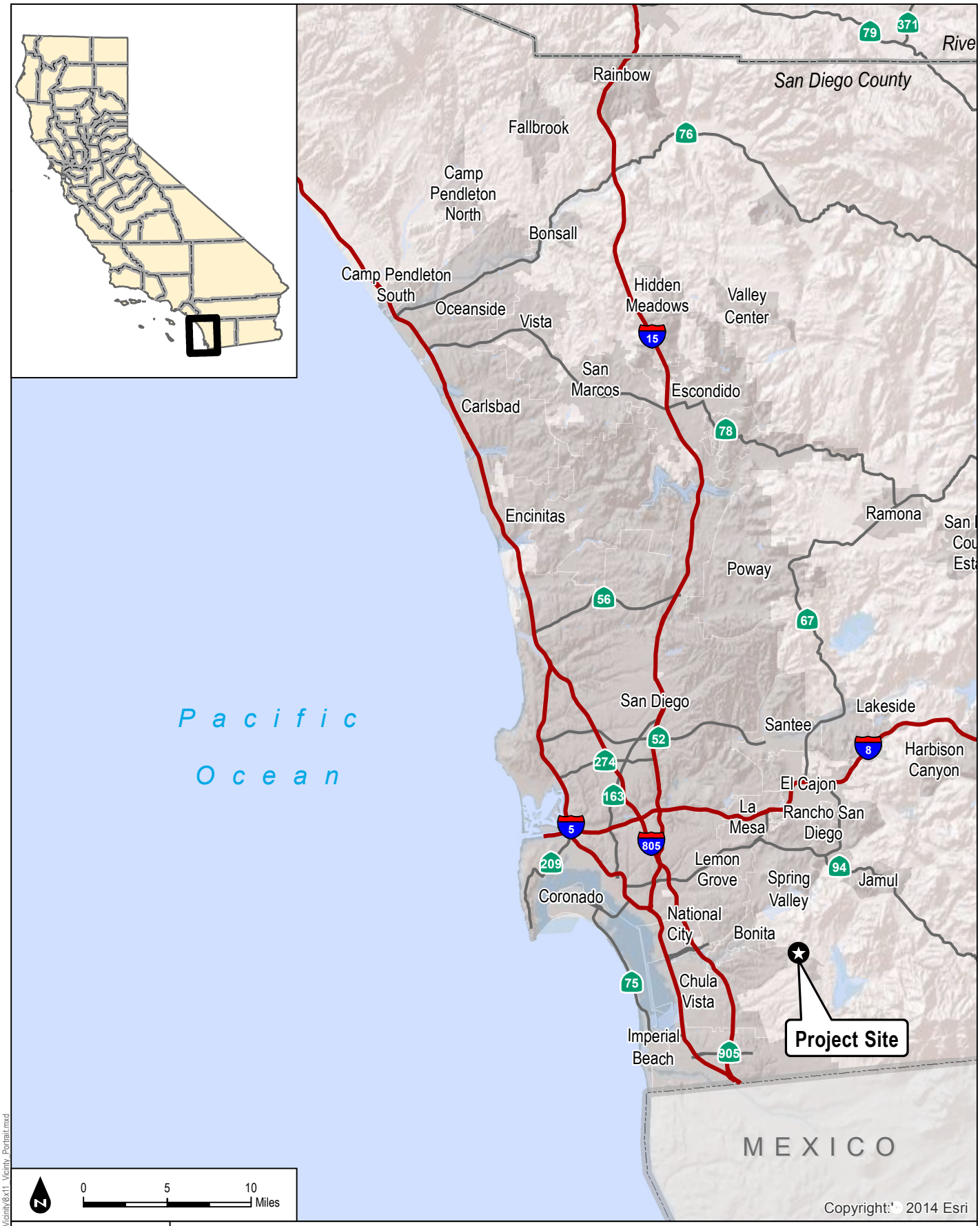

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FIGURE 1
Regional Map

Eastlake Self Storage Initial Study

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0 400 800 Feet

Study Area

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SOURCE: BING AERIAL MAPPING SERVICE

FIGURE 2
Vicinity Map

Eastlake Self Storage Initial Study

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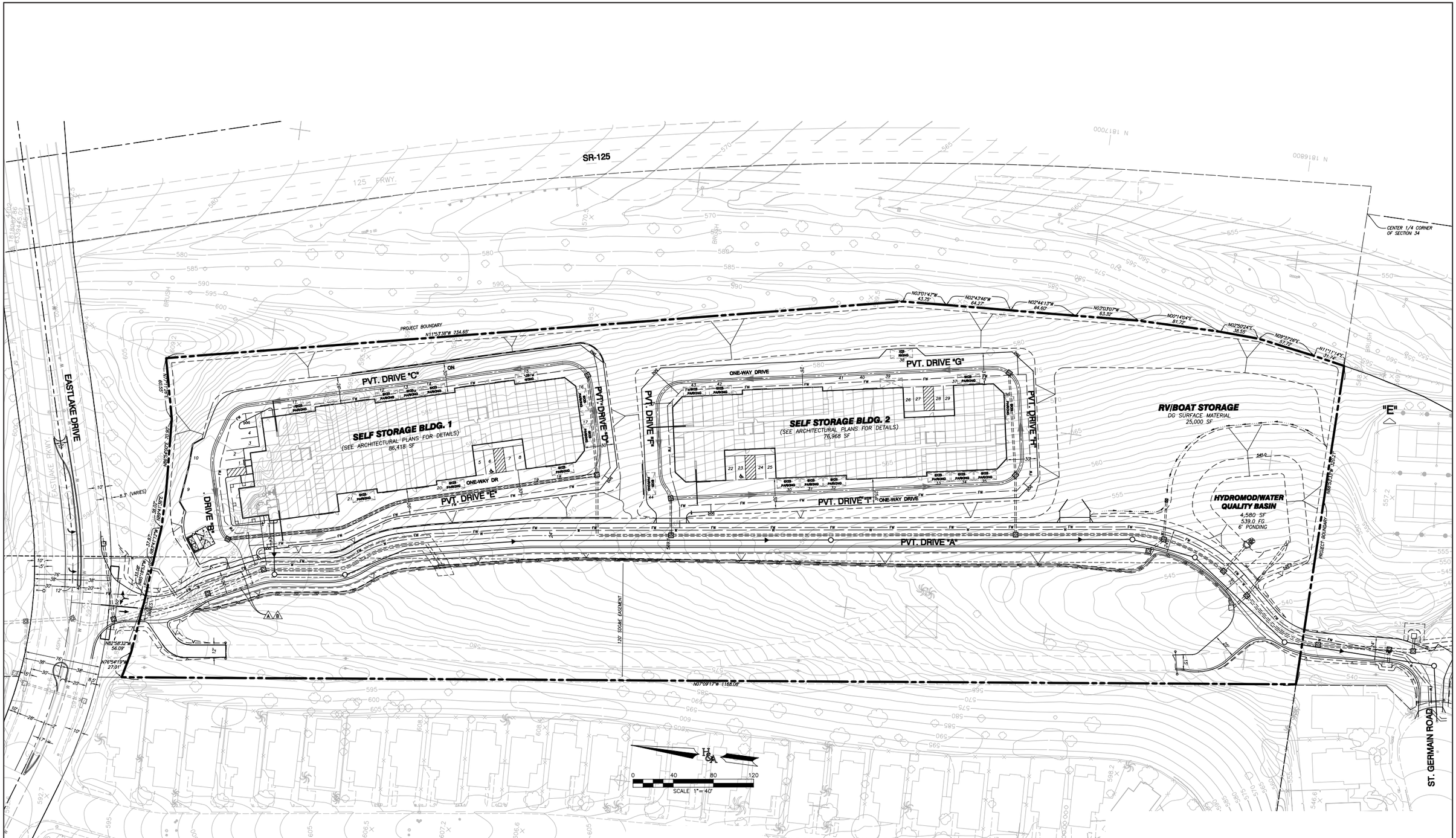

SOURCE: HUNSAKER & ASSOCIATES 2019

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FIGURE 3
Site Plan

Eastlake Self Storage Initial Study

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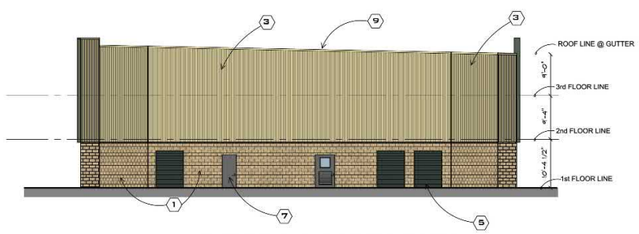
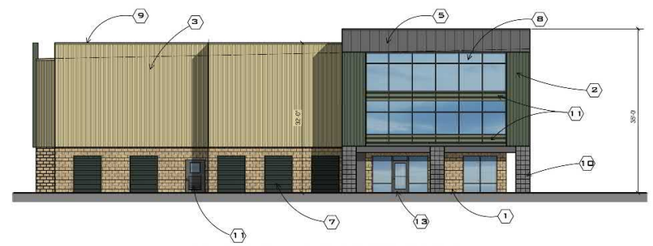
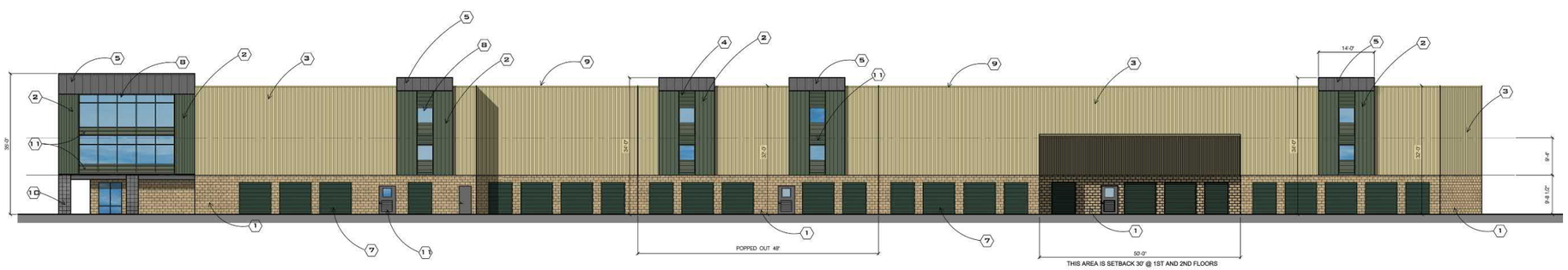
EAST ELEVATION
FREEWAY SIDE



SOUTH ELEVATION



NORTH ELEVATION



WEST ELEVATION
RESIDENTAIL SIDE

EXTERIOR ELEVATIONS

SOURCE: RMI ARCHITECTS 2018

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FIGURE 4
Building 1 Elevations

Eastlake Self Storage Initial Study

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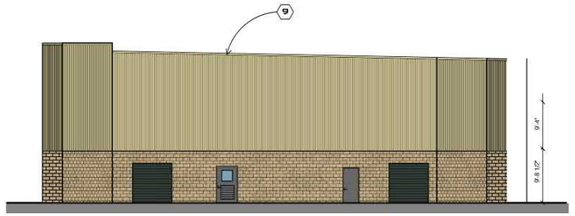
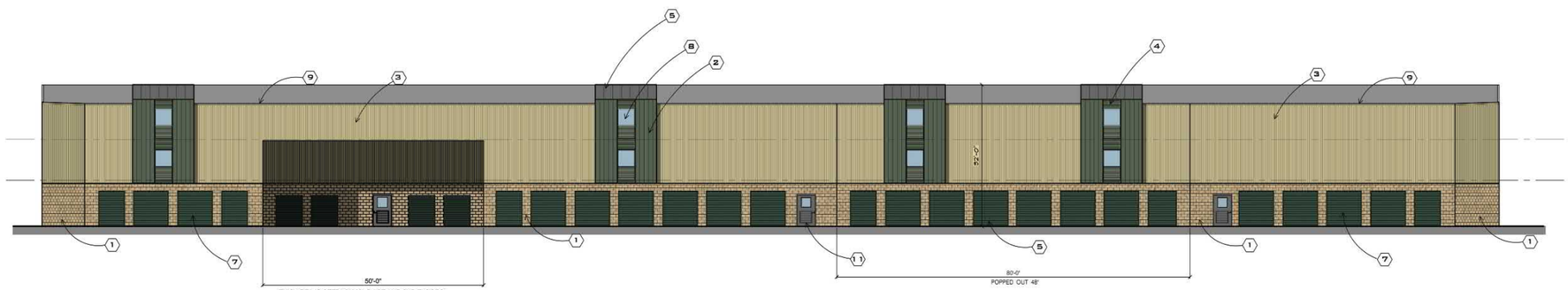
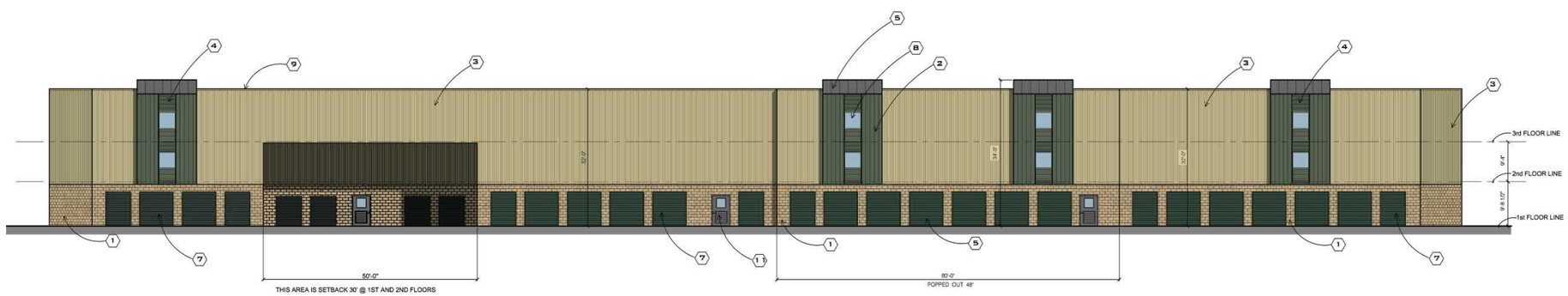


NORTH ELEVATION

SOUTH ELEVATION



EAST ELEVATION
FREEWAY SIDE



WEST ELEVATION
RESIDENTAIL SIDE

EXTERIOR ELEVATIONS

SOURCE: RMI ARCHITECTS 2018

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FIGURE 5
Building 2 Elevations

Eastlake Self Storage Initial Study

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SOURCE: RMI ARCHITECTS 2018

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FIGURE 6
Conceptual Architectural Rendering 1

Eastlake Self Storage Initial Study

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SOURCE: RMI ARCHITECTS 2018

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FIGURE 7
Conceptual Architectural Rendering 2

Eastlake Self Storage Initial Study

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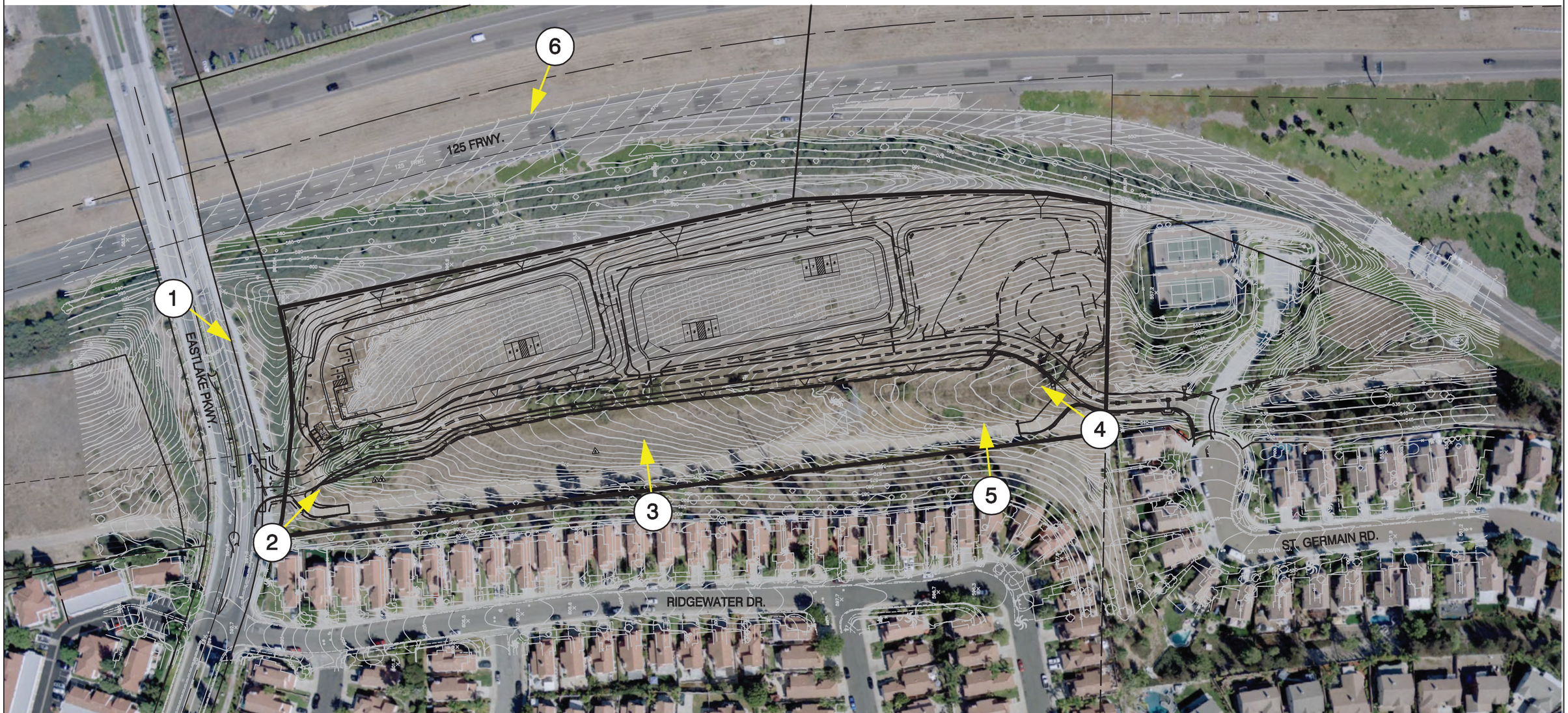

SOURCE: HUNSAKER & ASSOCIATES 2019

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FIGURE 8
Key Observation Point Map

Eastlake Self Storage Initial Study

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EXISTING VIEW

PROPOSED VIEW

SOURCE: HUNSAKER & ASSOCIATES 2019

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FIGURE 9
Key Observation Point #1

Eastlake Self Storage Initial Study

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EXISTING VIEW

PROPOSED VIEW

SOURCE: HUNSAKER & ASSOCIATES 2019

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FIGURE 10
Key Observation Point #2

Eastlake Self Storage Initial Study

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EXISTING VIEW

PROPOSED VIEW

SOURCE: HUNSAKER & ASSOCIATES 2019

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FIGURE 11
Key Observation Point #3

Eastlake Self Storage Initial Study

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EXISTING VIEW

PROPOSED VIEW

SOURCE: HUNSAKER & ASSOCIATES 2019

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FIGURE 12
Key Observation Point #4

Eastlake Self Storage Initial Study

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EXISTING VIEW

PROPOSED VIEW

SOURCE: HUNSAKER & ASSOCIATES 2019

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FIGURE 13
Key Observation Point #5

Eastlake Self Storage Initial Study

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EXISTING VIEW

PROPOSED VIEW

SOURCE: HUNSAKER & ASSOCIATES 2019

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FIGURE 14
Key Observation Point #6

Eastlake Self Storage Initial Study

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