Schwan Self-Storage

Addendum to
Schwan Self-Storage Project
Mitigated Negative Declaration
Case No. 17-055-DP RV

Prepared by:

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130 Cremona Drive, Suite B
Goleta, CA 93117

September 2017
# Addendum to Schwan Self-Storage Project
## Final Mitigated Negative Declaration

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1.0 INTRODUCTION

1.1 OVERVIEW

The City of Goleta ("City") has prepared this Addendum to the Mitigated Negative Declaration (MND) for the Schwan Self-Storage Project. The Final MND (10-MND-004) evaluated the potential environmental effects of the Schwan Self-Storage Project and was adopted by the Planning Commission in 2011. This document is prepared pursuant to the California Environmental Quality Act (CEQA) (Public Resources Code §§ 21000, et seq.) and CEQA Guidelines (California Code of Regulations, Title 14, §§ 15000, et seq.). The Schwan Self-Storage Project Final MND is available for review at the City Planning and Environmental Review Department.

1.2 BACKGROUND – SCHWAN SELF STORAGE PROEJCT, CASE NO. 07-229-DP

On October 24, 2011, the Goleta Planning Commission approved the Schwan Self-Storage Project for the construction of a new 110,600 square foot self-storage facility containing 685 units on a 2.06-acre site (Approved Project). The Final MND for the Schwan Self-Storage Project addressed the associated environmental impacts and mitigation measures.

On April 25, 2017, the Applicant filed a Revised project description (Revised Project) proposing several changes, including a reduction in building coverages and the addition of basements to each building. The changes were the result of a Union Pacific Railroad policy change in which they no longer granted longer term leases of their property. As the Original Project relied on the use of the long-term lease area to meet its fire access requirements, in order to maintain access the building had to pushed further back from the property line to allow for the fire access. As a result of pushing the buildings back the building foot prints were reduced in size, to make up for the lost square footage the Applicant incorporated basements into the project. Due to the effort involved in the addition of a basement to one building to make up the units, the Applicant chose to add basements to all three buildings. Due to the increase in the amount of grading and building area resulting from the addition of the basements, the applicant has submitted a request for a Development Plan Revision.

1.3 CEQA AUTHORITY FOR THE ADDENDUM ANALYSIS

According to CEQA Guidelines § 15164, an addendum to a previously certified Final MND or adopted Negative Declaration is the appropriate environmental document in instances when "only minor technical changes or additions are necessary or none of the conditions described in [CEQA Guidelines] Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred." CEQA Guidelines § 15162 calls for the preparation of a subsequent negative declaration if the lead agency determines that:

(1) Substantial changes are proposed in the Project which will require major revisions of the previous negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

(2) Substantial changes occur with respect to the circumstances under which the Project is undertaken which will require major revisions of the previous negative declaration
due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the negative declaration was adopted, shows any of the following:
   a. The Project will have one or more significant effects not discussed in the previous negative declaration;
   b. Significant effects previously examined will be substantially more severe than shown in the previous Final MND;
   c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the Project, but the Project proponents decline to adopt the mitigation measure or alternative; or
   d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous Final MND would substantially reduce one or more significant effects on the environment, but the Project proponents decline to adopt the mitigation measure or alternative.

As set forth in this Addendum, none of the conditions described above will occur in relation to the Schwan Self-Storage Revised Project. Therefore, an Addendum is appropriate for this Revised Project. This document describes the Revised Project and the minor changes, the similarity in impact levels or lack of new mitigation measures compared to those identified in the Schwan Self-Storage Project Final MND.

As discussed in the following sections, the impacts associated with the Revised Project do not substantially exceed those impacts identified in the adopted Schwan Self-Storage Project Final MND. As supported by the analysis below, the Revised Project would have no new significant environmental effects beyond those identified in the Schwan Self-Storage Project Final MND. Therefore, this Addendum is the appropriate environmental document under CEQA. As discussed below, mitigation measures identified in the Schwan Self-Storage Project Final MND would remain applicable to the Revised Project.

1.4 **SCOPE OF ADDENDUM**

This Addendum to the Schwan Self-Storage Project Final MND analyzes environmental impacts and mitigation measures that may be associated with implementation of the Revised Project described in detail in Section 2.0, Project Description. The scope of analysis of this Addendum addresses each of the environmental resource areas that were previously analyzed in the Schwan Self-Storage Project Final MND, including the following:

- Aesthetics/Visual Resources
- Agriculture and Forest Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazardous Materials/Risk of Upset
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation and Circulation
- Utilities and Service Systems
1.5 ADOPTION AND AVAILABILITY OF ADDENDUM

This Addendum to the Schwan Self-Storage Project Final MND will be considered by the Planning and Environmental Review Director as part of the Revised Project consideration. In accordance with CEQA Guidelines § 15164(c), an Addendum need not be circulated for public review but can be included in or attached to the Final MND. The decision-making body considers the Addendum with the Final MND before making a decision on the Project.

The Addendum will be available on the City’s website for general public reference and at the following locations:

City of Goleta
Planning & Environmental Review Department
130 Cremona Drive, Suite B
Goleta, California 93117

Goleta Library
500 N. Fairview Avenue
Goleta, CA 93117

2.0 PROJECT DESCRIPTION

2.1 PROJECT LOCATION

The Project site is located at 10 South Kellogg Avenue. The parcel is located at the north end of South Kellogg Avenue between the 101 Freeway and Union Pacific Railroad in the City of Goleta (City). The project site is also identified as Assessor’s Parcel No. (APN) 071-090-082. Figure 1 shows the Schwan Self-Storage Project location.

2.2 REVISED PROJECT

The Schwan Self-Storage Project was previously approved for 3 buildings with 685 storage units on its 2.23-acre site (including the UPR lease area). The proposed project (“Revised Project”) includes the following elements:

- Remove the Union Pacific Railroad (UPR) lease area (7,433 square feet) from inclusion in the project area. The revised project area is now 89,734 square feet (2.06 acres).
- Narrow the width of proposed buildings B and C by decreasing footprint by 10 feet on the southern side so that adequate fire access and landscaping can be provided without using the UPR lease area.
- Add basements to all three buildings (A, B, and C), resulting in an increase in overall square footage of 25,141 sq. ft. (from 110,600 gross square feet to 135,741 gross square feet). Individual building increase are provided below in table 1.
- Remove managers caretaker unit and convert area to additional storage units.
- Increase the number of storage units from 685 to 863 units (178-unit increase).
- Additional soil export of 11,415 cubic yards.

<table>
<thead>
<tr>
<th>Building</th>
<th>Approved Project</th>
<th>Revised Project</th>
</tr>
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<tbody>
<tr>
<td></td>
<td>Gross SF</td>
<td>Net SF</td>
</tr>
<tr>
<td>A</td>
<td>34,850</td>
<td>32,349</td>
</tr>
<tr>
<td>B</td>
<td>37,930</td>
<td>35,554</td>
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The building square footage would increase by 25,141 gross square feet, a 22.7% increase over the Approved Project.

### Table 2

<table>
<thead>
<tr>
<th>Site Coverage – Approved and Revised</th>
<th>Approved Project</th>
<th>Revised Project</th>
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<td></td>
<td>Square Feet</td>
<td>% of Area</td>
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<tr>
<td>Building Footprints</td>
<td>37,210</td>
<td>38.29</td>
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<tr>
<td>Trash Enclosures</td>
<td>293</td>
<td>0.30</td>
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<tr>
<td>Landscape Areas</td>
<td>20,908</td>
<td>21.52</td>
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<tr>
<td>Storm Drain Infiltration Areas</td>
<td>Included</td>
<td>0</td>
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<tr>
<td>Hardscape and Paving</td>
<td>38,650</td>
<td>39.79</td>
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<tr>
<td><strong>Total Site Area</strong></td>
<td><strong>97,061</strong></td>
<td><strong>100.0</strong></td>
</tr>
</tbody>
</table>

**Entitlements:** The Revised Project includes a request for the following entitlement:

Development Plan Revision (17-055-DP RV) to allow an increase in the number of storage units, to allow an increase in the square footage of the buildings, addition of basements, and other minor changes.

Development Plan Revision (DP RV). The existing Schwan Self-Storage Development Plan permits three buildings containing 685 storage units and 32 parking spaces on the 2.23-acre (including 0.17-acre lease area) Project site. The proposed change would increase the number of storage units from 685-unit to 863-units through the addition of basements to each building. The lease area would no longer be counted toward the project area, and as a result building B and C will be located further away from the southern property line, losing 10 feet along the southern portion of the buildings. The changes to the building footprint of buildings B and C, will result in the building coverage being reduced from 37,210-square feet to 33,094-square feet.

The number of buildings (3) and the building heights will remain the same at a maximum height of 35-feet between the Approved and Revised Projects. In addition, the overall building design will remain the same. Twenty-six (26) parking spaces are proposed to serve the storage project, for which 12 spaces are required.

Grading on the Project site would include approximately 13,365 cubic yards (CY) of cut and 1,950 CY of fill. The Revised Project will require 11,415 CY of soil to be exported from the project site, due to the construction of the basements. Anticipated export hauling would occur during non-peak traffic hours over a course of approximately 3 weeks. This is an increase from the Approved Project, which required no export and 1,340CY of import.

All relevant mitigation measures and conditions of approval adopted for the Approved Project would continue to apply to the Revised Project.
Figure 1 – Project Location
Figure 2 – Revised Project Site Plan
3.0 CEQA ENVIRONMENTAL ANALYSIS

3.1 INTRODUCTION

This Addendum addresses the Revised Project’s effects related to the environmental topics and mitigation measures addressed in the Schwan Self-Storage Project Final MND. The baseline for review is the Schwan Self-Storage Project Final MND as approved and entitled as described in section 2.0 above. The Schwan Self-Storage Project Final MND is included as Appendix A to this Addendum for reference.

3.2 DETERMINING SIGNIFICANCE

The criteria for determining the significance of environmental impacts in this Addendum are the same as those contained in the Schwan Self-Storage Project Final MND. While the criteria for determining significant impacts are unique to each issue area, the analysis applies a uniform classification of the impacts based on the following definitions:

- A designation of **no impact** is given when no adverse changes in the environment are expected.
- A **less-than-significant impact** would cause no substantial adverse change in the environment.
- An impact that is **less than significant with mitigation incorporated** avoids substantial adverse impacts on the environment through mitigation.
- A **significant and unavoidable** impact would cause a substantial adverse effect on the environment, and no feasible mitigation measures would be available to reduce the impact to a less-than-significant level.

Based on the above criteria, the environmental impact analysis assesses each issue area to determine the significance level. The City categorizes Project impacts as follows:

- **Class I** impacts are significant adverse impacts that cannot be feasibly mitigated, reduced, or avoided. During approval of the Approved Project, the City Council adopted a statement of overriding considerations, pursuant to CEQA Guidelines §15093, explaining why the Project benefits outweigh the disturbance caused by the significant unavoidable environmental impact.
- **Class II** impacts are significant adverse impacts that can be feasibly reduced or avoided through the implementation of GP/CLUP policies, or by other recommended mitigation. During approval of the Approved Project, the City Council made findings pursuant to CEQA Guidelines § 15091 that impacts have been mitigated to the maximum extent feasible by implementing the mitigation measures.
- **Class III** impacts are adverse impacts that are less than significant. During approval of the Project, the City Council was not required to make CEQA findings regarding these impacts.
- **Class IV** impacts include changes to the environment as a result of Project implementation that would be beneficial.
3.3 REQUIREMENTS FOR CUMULATIVE IMPACT ANALYSIS

CEQA Guidelines §15130 requires a reasonable analysis of the cumulative impacts of a project. Cumulative impacts are defined as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts” (CEQA Guidelines §15355).

The City’s previous adoption of the GP/CLUP involved no immediate direct physical environmental impacts. Rather, the GP/CLUP projected future development within the City, and the Final MND analysis focused on “indirect” impacts associated with the adoption of the GP/CLUP.

Because these impacts would occur over time as part of individual residential and commercial/industrial development projects, a project horizon year (2030) was established for purposes of analysis in the Schwan Self-Storage Project Final MND. Since an Addendum involves the assessment of only minor technical changes in the conditions assumed to exist, no change in the Schwan Self-Storage Project Final MND-assessed cumulative impacts would occur and cumulative impact assessment is not a part of this Addendum.

3.4 CONSISTENCY WITH GOLETA’S GENERAL PLAN/COASTAL LAND USE PLAN

The proposed Addendum is a minor revision to the Schwan Self-Storage Project Final MND that is consistent with the GP/CLUP goals and policies, as mitigated. No changes to the Approved Project are proposed that would result in any inconsistencies with the GP/CLUP.

3.5 ENVIRONMENTAL IMPACT ANALYSIS

For an Addendum to be an adequate environmental document for a Project pursuant to CEQA, the Project must involve only a minor technical change or addition. From an environmental perspective, the Lead Agency must demonstrate the following with respect to that proposed change:

- That the project will not have one or more significant effects not discussed in the previous Final MND;
- That the project would not create effects that result in an increase in the severity of significant effects already identified in the previous Final MND;
- That all feasible mitigation measures are accepted and adopted; and
- That no additional mitigation measures are required to reduce one or more significant effect or, if these are required, that they are imposed as part of the environmental assessment.

This Addendum is an environmental analysis for the proposed Revised Project described in Section 2.0 Project Description.

3.5.1 Potential Environmental Impacts of the Proposed Project

This section addresses each of the environmental issues discussed in the Schwan Self-Storage Project Final MND to determine whether the Revised Project has the potential to create new significant impacts or a substantial increase in the significance of a significant impact as
Schwan Self-Storage Development Plan Revision
Addendum to the Schwan Self-Storage Project Mitigate Negative Declaration

compared to what was identified in the Schwan Self-Storage Project Final MND, within the framework of CEQA Guidelines § 15162 and 15164.

AESTHETICS

The Schwan Self-Storage Project Final MND describes the aesthetics/visual resources setting relative to the Project, impacts on aesthetics/visual resources that would result from the Approved Project, and mitigation measures that would reduce potentially significant impacts. The three proposed three story buildings would have a maximum height of 35-feet in both the Approved and Revised Project. The peak height includes architectural elements that are allowed to exceed the building height definition established by the Zoning Ordinance. The Revised Project’s size, scale, architecture, landscaping, lighting and fencing are designed to be consistent with the Approved Project design. The Revised Projects design is consistent with the projects approval from the Design Review Board. Therefore, the Revised Project will not result in any new significant aesthetics/visual resources impacts and no changes to mitigation measures are necessary.

Project-Specific Impacts: All previously identified impacts on Visual Character, and Light and Glare in the Schwan Self-Storage Project Final MND are still expected to occur with the Revised Project.

Cumulative Impacts: Due to continued Project specific visual impacts on night lighting, and the visual character of the surrounding area, project contributions to cumulative visual/aesthetic impacts on aesthetic resources remain the same.

Mitigation Measures: The following mitigation measures related to Project Screening, Visual Character, and Light and Glare continue to be applicable to the Revised Project: AS -1, -2, -3, -4, -5, -6, -7, -8, -9, and -10.

Residual Impacts: With implementation of the adopted mitigation measures, the residual project specific impacts to aesthetics, visual and scenic resources, as well as project contributions to cumulative changes in visual character of the surrounding area due to exterior lighting, would be less than significant.

AGRICULTURE AND FOREST RESOURCES

The Schwan Self-Storage Project Final MND stated that no lands zoned as forest lands or timberlands are located on the project site or in its immediate vicinity and therefore the Approved Project would have no impact on forest resources in the area.

Project-Specific Impacts: As with the Approved Project, the Revised Project would not result in an impact on forest resources in the area.

Cumulative Impacts: The Revised Project would result in no contribution to the cumulative loss of agricultural land and resources within the City.

Mitigation Measures: No mitigation measures are required or recommended.

Residual Impact: None
AIR QUALITY

The Schwan Self-Storage Project Final MND describes the air quality setting relative to the Approved Project, impacts on air quality that would result from the Project and mitigation measures that would reduce potentially adverse but not significant impacts. The City of Goleta has adopted specific thresholds for reactive organic gases and nitrogen oxides, but not for carbon monoxide or particulate matter. See Appendix B, Air Quality and Greenhouse Gas – URBEMIS Results Health Risk Assessment, for details.

Construction Emissions Assumptions

Construction emissions were modeled for the previously approved Approved Project and the proposed Revised Project. The Approved Project evaluated in the 2011 Schwan Self Storage Final MND includes development of 110,600-square feet of storage space containing 685-units. The Revised Project includes development of 135,741-square feet of storage space, containing 863-units. Emissions for the Approved Project and the Revised Project were estimated to determine the difference in construction emissions. Estimated emissions were based on construction information provided by the Project Applicant (Schwan), the previous analysis contained in the 2011 Schwan Self Storage Final MND, and the Urbemis 2007 Version 9.2.4 (Urbemis) default values were utilized when project–specific information was not known and/or immediately available. Urbemis was used to generate construction phasing for both scenarios for consistency since it was used for the calculation of the original air quality analysis. The Revised Project was also run in the most recent version of CalEEMod (CalEEMod.2016.3.1) to provide emission estimates using a more up to date program, to provide a more accurate Revised Project emission estimate. The analysis contained herein is based on the following assumptions for the Approved and the Revised Projects (duration of phases is approximate):

Estimated Construction Phasing for Approved Project
- Grading/Soil Export/Hauling – 30 days
- Building Construction – 160 days
- Paving – 10 days
- Application of Architectural Coatings – 20 days

Estimated Construction Phasing for Revised Project
- Grading/Soil Export– 52 days
- Building Construction – 213 days
- Paving – 10 days
- Application of Architectural Coatings – 29 days

The variety of construction equipment used for estimating the construction emissions of the Approved and Revised Project is based on URBEMIS and CalEEMod defaults and is shown in Table 1 of Appendix B Construction Scenario Assumptions and Appendix C OffRoad Equipment, respectively,. The Revised project assumed the same construction equipment as assumed in the 2011 Final MND, as well as the hours of operation duration.

The Approved Project’s analysis in the 2011 Schwan Self Storage Final MND more accurately presents the difference in construction emissions for both the Approved and Revised Projects, URBEMIS Version 9.2.4 was used for the analysis of both scenarios, which includes updated calculation equations and emission factors. For this analysis, it was assumed that heavy construction equipment will operate 5 days a week during Project construction for both
scenarios. The same assumptions were used for the CalEEMod modelling as well. Additionally, worker vehicle trips and vendor truck trips are based on URBEMIS Version 9.2.4 and CalEEMod 2016.3.1 default values.

The haul truck assumptions for the Revised Project scenario were based on information provided by the applicant and Association Transportation Engineers (ATE) Trip Generation Comparison and Soil Export Evaluation for the Schwan Self Storage Project memorandum (ATE 2017; Appendix D). An additional 11,415 yards (cy) of soil are required to be exported off-site as a result of change made on the Revised Project to add the basement, when compared to the Approved Project.

The Approved Project assumes import of 1,340 cubic yards of soil material; the Revised Project assumes export of 11,415 cubic yards of excess cut material. Haul truck trips for all export activities are estimated based on the estimated export volume and the haul truck capacity provided by ATE (ATE 2017) (i.e., 15 cubic yards per truck). Accordingly, the additional 11,415 cubic yards of export is estimated to require an additional 1,520 one-way haul truck trips (760 round truck trips).

### Table AQ - 1
Estimated Annual Construction Emissions for the 2011 Final MND and Revised Project

<table>
<thead>
<tr>
<th></th>
<th>ROC</th>
<th>NOx</th>
<th>CO</th>
<th>SOx</th>
<th>PM10</th>
<th>PM2.5</th>
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<tr>
<td><strong>2011 Final MND for the Approved Project vs. Revised Project</strong></td>
<td></td>
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<tr>
<td>Approved Project (URBEMIS)</td>
<td>1.41</td>
<td>1.51</td>
<td>1.66</td>
<td>0.00</td>
<td>0.26</td>
<td>0.12</td>
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<tr>
<td>Revised Project (URBEMIS)</td>
<td>1.12</td>
<td>1.08</td>
<td>1.27</td>
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<td>1.47</td>
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<td>Net Annual Project Emissions (Revised Project Increase)</td>
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<td>0.43</td>
<td>0.39</td>
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<td>No</td>
<td>-</td>
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**Notes:** See Appendix B and C for detailed results. ROC = reactive organic compounds; NOx = oxides of nitrogen; CO = carbon monoxide; SOx = sulfur oxides; PM10 = coarse particulate matter; PM2.5 = particulate matter.

As shown in Table AQ-1, the annual construction emissions estimated in the 2011 Final MND for the Approved Project using Urbemis would not exceed the SBCAPCD threshold guidelines of 25 tons per year for any pollutant. Buildout of the Revised Project would result in a slight decrease in estimated annual construction emissions for ROC, NOx, CO, and SOx compared to the 2011 Final MND. However, there was an estimated increase in PM10 and PM2.5 emissions for the Revised Project compared to the 2011 Final MND due to the increase in fugitive dust created from the soil export. When run in CalEEMod the Revised Project would result in slight decrease to all emissions with the exception of NOx, which would increase slightly. While the Revised Project would result in a slight increase in some construction emissions, under both the Urbemis and CalEEMod estimates, these minor increase in construction emissions would not represent a substantial change in project-generated construction emissions and would not alter
the impact significance conclusions of the previous 2011 Final MND. In both Urbemis and CalEEMod the Revised Project’s emissions do not exceed the SBCAPCD threshold guidelines for construction.

Operation Emissions

The Revised Project would include the development of an additional 178-storage units over what was analyzed in the Schwan Self-Storage Project Final MND.

Project-generated trip estimates used were calculated based on the land use and trip generation rates identified in the ATE 2017 memo the Schwan Self-Storage Project Final MND. Trip generation rates for mini storage and apartments are based on the number of units. As, the Revised Project would in remove the apartment unit but increase the number of storage, the traffic generated by the Revised project would generate more traffic than the Approved Project. As a result, the total emissions generated by the Revised Project would increase slightly over the Approved Project as shown in Table AQ-2 below.
## Table AQ - 2
### Estimated Maximum Daily Operational Emissions for the Approved 2011 Final MND and Revised Project

<table>
<thead>
<tr>
<th></th>
<th>ROC</th>
<th>NO\textsubscript{x}</th>
<th>CO</th>
<th>SO\textsubscript{x}</th>
<th>PM\textsubscript{10}</th>
<th>PM\textsubscript{2.5}</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>2011 Final MND for the Approved Project (Urbemis)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Area Source Emissions\textsuperscript{a}</td>
<td>0.82</td>
<td>0.76</td>
<td>2.17</td>
<td>0.00</td>
<td>0.01</td>
<td>0.01</td>
</tr>
<tr>
<td>Vehicular (Mobile) Source Emissions</td>
<td>2.60</td>
<td>3.01</td>
<td>23.07</td>
<td>0.01</td>
<td>2.71</td>
<td>0.52</td>
</tr>
<tr>
<td>Combined Total Emissions</td>
<td>3.42</td>
<td>3.77</td>
<td>25.24</td>
<td>0.01</td>
<td>2.72</td>
<td>0.53</td>
</tr>
<tr>
<td>Vehicle Source Emissions Threshold Exceeded?</td>
<td>No</td>
<td>No</td>
<td>—</td>
<td>—</td>
<td>N/A</td>
<td>—</td>
</tr>
<tr>
<td>Area + Vehicle Source Emissions Threshold</td>
<td>240</td>
<td>240</td>
<td>—</td>
<td>—</td>
<td>80</td>
<td>—</td>
</tr>
<tr>
<td>Area + Vehicle Source Emissions Threshold Exceeded?</td>
<td>No</td>
<td>No</td>
<td>—</td>
<td>—</td>
<td>—</td>
<td>—</td>
</tr>
<tr>
<td><strong>Revised Project (Urbemis)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Area Source Emissions\textsuperscript{a}</td>
<td>0.68</td>
<td>0.62</td>
<td>2.05</td>
<td>0.00</td>
<td>0.01</td>
<td>0.01</td>
</tr>
<tr>
<td>Vehicular (Mobile) Source Emissions</td>
<td>1.35</td>
<td>1.27</td>
<td>10.85</td>
<td>0.01</td>
<td>2.11</td>
<td>0.40</td>
</tr>
<tr>
<td>Combined Total Emissions</td>
<td>2.03</td>
<td>1.89</td>
<td>12.90</td>
<td>0.01</td>
<td>2.12</td>
<td>0.41</td>
</tr>
<tr>
<td>Vehicle Source Emissions Threshold Exceeded?</td>
<td>No</td>
<td>No</td>
<td>—</td>
<td>—</td>
<td>N/A</td>
<td>—</td>
</tr>
<tr>
<td>Area + Vehicle Source Emissions Threshold</td>
<td>240</td>
<td>240</td>
<td>—</td>
<td>—</td>
<td>80</td>
<td>—</td>
</tr>
<tr>
<td>Area + Vehicle Source Emissions Threshold Exceeded?</td>
<td>No</td>
<td>No</td>
<td>—</td>
<td>—</td>
<td>—</td>
<td>—</td>
</tr>
<tr>
<td><strong>Net Revised Project Emissions (Urbemis)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2011 Final MND</td>
<td>3.42</td>
<td>3.77</td>
<td>25.24</td>
<td>0.01</td>
<td>2.72</td>
<td>0.53</td>
</tr>
<tr>
<td>Revised Project</td>
<td>2.03</td>
<td>1.89</td>
<td>12.90</td>
<td>0.01</td>
<td>2.12</td>
<td>0.41</td>
</tr>
<tr>
<td><strong>Net Change in Total Emissions</strong></td>
<td>1.39</td>
<td>1.88</td>
<td>12.34</td>
<td>0.00</td>
<td>0.60</td>
<td>0.12</td>
</tr>
<tr>
<td><strong>Revised Project (CalEEMod)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Area Source Emissions\textsuperscript{a}</td>
<td>3.5</td>
<td>0.16</td>
<td>0.15</td>
<td>0.00</td>
<td>0.01</td>
<td>0.01</td>
</tr>
<tr>
<td>Vehicular (Mobile) Source Emissions</td>
<td>0.58</td>
<td>2.06</td>
<td>6.12</td>
<td>0.014</td>
<td>1.22</td>
<td>0.34</td>
</tr>
<tr>
<td>Combined Total Emissions</td>
<td>4.11</td>
<td>2.22</td>
<td>6.28</td>
<td>0.015</td>
<td>1.24</td>
<td>0.35</td>
</tr>
<tr>
<td>Vehicle Source Emissions Threshold Exceeded?</td>
<td>No</td>
<td>No</td>
<td>—</td>
<td>—</td>
<td>N/A</td>
<td>—</td>
</tr>
<tr>
<td>Area + Vehicle Source Emissions Threshold</td>
<td>240</td>
<td>240</td>
<td>—</td>
<td>—</td>
<td>80</td>
<td>—</td>
</tr>
<tr>
<td>Area + Vehicle Source Emissions Threshold Exceeded?</td>
<td>No</td>
<td>No</td>
<td>—</td>
<td>—</td>
<td>—</td>
<td>—</td>
</tr>
</tbody>
</table>

**Notes:** See Appendix B and C for detailed results. Emissions presented are the maximum daily summer or winter emissions results from URBEMIS. ROC = reactive organic compounds; NO\textsubscript{x} = oxides of nitrogen; CO = carbon monoxide; SO\textsubscript{x} = sulfur oxides; PM\textsubscript{10} = coarse particulate matter; PM\textsubscript{2.5} = fine particulate matter, lbs./day = pounds per day. \textsuperscript{a}Emissions associated with natural gas usage (energy source emissions) are included in the Area Source Emissions.
As shown in Table AQ-2, the previously evaluated project in the 2011 Final MND was determined not to exceed any of the SBCAPCD emission thresholds. Similarly, the Revised Project would not exceed any of the SBCAPCD emission thresholds. Compared to the 2011 Final MND, the Revised Project would decrease all criteria pollutant emissions during operation. This can be attributed to a decrease in the trip rates compared to the 2011 Final MND and a more efficient vehicle fleet in 2019 compared to 2010. It should be noted that although the Trip Memo (ATE 2017) showed that the Revised Project would have higher average daily traffic than the Approved Project, the 2011 MND modelled traffic emissions based on a higher traffic rate than what was estimated in the 2017 Trip Memo for the Revised Project. When compared in Urbemis the Revised Project would result in lower overall operational emissions for pollutants with adopted significance thresholds (i.e., ROC, NOx, CO, and PM10). When run in CalEEMod and compared to the Approved Project, the Revised Project would result in lower overall operational emissions for NOx, CO, and PM10 pollutants, only ROC will increase slightly. However, even with the increase in ROC emissions under CalEEMod, the Revised Project’s emissions would not exceed adopted significance thresholds. Therefore, the Revised Project would not represent a substantial change in operational emissions compared to the Approved Project and would not alter the impact conclusions of the previous 2011 Final MND.

The Revised Project air quality impacts would remain potentially significant but mitigable. The Revised Project will still be subject to all mitigation measures for air quality and transportation identified in the Schwan Self-Storage Project Final MND, such as dust control, energy conservation, transportation system improvements and, and permitting requirements of the SBCAPCD.

**Project-Specific Impacts:** All the previously identified impacts related to construction emissions, demolition, and long term operation emissions in the Schwan Self-Storage Project Final MND are still expected to occur.

**Cumulative Impacts:** Cumulative impacts on air quality remain the same

**Mitigation Measures:** The following mitigation measures related to appropriate ventilation, air quality disclosures, dust generation, mitigation of construction equipment emissions, and asbestos notifications continue to be applicable to the Revised Project: AQ -1, -2, -3, -4, -5, -6, and -7.

**Residual Impacts:** Under the above mitigation measure, residual Project-specific and cumulative impacts would continue to be reduced to less than significant.

**BIOLOGICAL RESOURCES**

Section 4.3 of the Schwan Self-Storage Project Final MND describes the biological setting relative to the Project, impacts on biological resources that would result from the Project, and includes mitigation measures that would reduce potentially significant impacts to Class II. The Revised Project does not include any elements that would affect biological resources in a new or different manner. Therefore, no new impacts will occur and no changes to mitigation measures are necessary.
**Project-Specific Impacts:** All previously identified impacts related to Streamside Protection Area buffers, creek runoff, disturbance of wildlife habitat, and habitat removal in the Final MND are still expected to occur.

**Cumulative Impacts:** Cumulative impacts on biological resources remain the same.

**Mitigation Measures:** The following mitigation measures related to erosion control, creek buffers, habitat restoration, maintenance agreements, tree protection, wildlife surveys, and construction management are still required: BIO -1, -2, -3, -4, -5, -6, -7, -8, -9, -10, -11, -12, -13, -14, -15, -16, -17, and -18.

**Residual Impacts:** With the above mitigation measures, the Revised Project’s impact on biological resources would be reduced to less than significant.

**CULTURAL RESOURCES**

The Schwan Self-Storage Project Final MND describes the archaeological setting relative to the Schwan Self-Storage Project, impacts on archaeological resources that would result from the Project, and includes mitigation measures that would reduce potentially significant impacts. The Revised Project does not include any elements that would affect archaeological resources in a new or different manner. Although, the construction of the basements would require substantially more excavation the Final MND found that based on the project specific Phase I Archaeological Survey and review of the soil study auger borings the likelihood of encounter cultural resources on site was low as nothing was found. However, since the presence of archaeological/cultural resources cannot be absolutely ruled out, potential project impacts on such possible resources are still considered potentially significant. Therefore, no new impacts are expected to occur and no changes to mitigation measures are necessary, however due to the additional excavation one additional recommended mitigation has been added to require monitoring during initial excavations.

**Project-Specific Impacts:** The following previously identified impacts regarding potential disturbance of cultural resources in the Final MND is still expected to occur:

**Cumulative Impacts:** Cumulative impacts on archaeological resources remain the same.

**Mitigation Measures:** The following mitigation measure related to discovery of cultural resources is still required: CR-1.

**Residual Impacts:** With implementation of the above mitigation measures, residual Revised Project-specific and cumulative impacts related to archaeological and historic resources would be reduced to a less than significant level.

**GEOLOGY AND SOILS**

The Schwan Self-Storage Project Final MND describes the geologic setting relative to the Project, impacts on geologic resources that would result from the Project, and mitigation measures that would reduce potentially significant impacts. While the Revised Project would require additional grading and excavations, the project would still be subject to the City adopted California Building Code, and would not affect geologic resources in a new or different manner. Therefore, no new impacts are expected to occur and no changes to mitigation measures are necessary

**Project-Specific Impacts:** All previously identified impacts related to soil erosion and soil compression in the Final MND are still expected to occur.
Cumulative Impacts: Cumulative impacts on geology and soils remain the same.

Mitigation Measures: The following mitigation measures are still required to further ensure that necessary geotechnical and erosion control measures are incorporated into final plans and implemented during construction: GEO - 1 and -2.

Residual Impacts: Implementation of the mitigation measures GEO 1 and 2 above would ensure residual Project-specific and cumulative impacts related to geology and soils would be less than significant.

GREENHOUSE GAS EMISSIONS

Greenhouse Gas Emissions (GHG) were analyzed under Greenhouse Gas Emissions in the Schwan Self-Storage Project Final MND. This section evaluates the Approved and Revised Project’s GHG emissions separately. See Schwan Self-Storage Project Final MND Appendix B, Air Quality and Greenhouse Gas Emissions Assessment Memorandum.

Construction GHG Emissions Analysis

As with the air quality assessment, full buildout of the Approved Project and the Revised Project were evaluated to estimate the net change in GHG emissions associated with the change of the Revised Project. The construction analysis assumed buildout conditions to evaluate the change in GHG construction emissions associated with buildout of the Revised Project compared to buildout of the Approved Project. Construction of either project would result in GHG emissions associated with use of off-road construction equipment, hauling trucks (dump trucks), vendor (material delivery) trucks, and worker vehicles. GHG emissions associated with temporary construction activity were quantified using URBEMIS and CalEEMod. A detailed depiction of the construction schedule—including information regarding phasing, equipment utilized during each phase, haul trucks, vendor trucks, and worker vehicles—is included in Appendix B Section 2.1, Construction Assumptions, of this memorandum. Emissions from on-site sources (i.e., off-road equipment) and off-site sources (i.e., hauling and vendor trucks and worker vehicles) are combined for the purposes of this analysis; a breakdown of emissions by source is provided in Appendix B - Attachments A and B. Table GHG-1, Estimated Annual Construction Greenhouse Gas Emissions for the 2011 Final MND and Revised Project, presents a comparison between the GHG emissions associated with the construction of the Approved and the Revised Project. As previously discussed, the 2011 Final MND used URBEMIS to estimate construction emissions. This analysis, therefore, uses URBEMIS to accurately compare the GHG emissions generated from the Approved and the Revised project.
### Table GHG - 1
Estimated Annual Construction Greenhouse Gas Emissions for the Approved Project and Revised Project

<table>
<thead>
<tr>
<th></th>
<th>CO₂E (metric tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Total</strong></td>
<td>158.99</td>
</tr>
<tr>
<td><strong>Revised Project (Urbemis)</strong></td>
<td>235.73</td>
</tr>
<tr>
<td><strong>Net Annual Project Emissions (Revised Project Increase)</strong></td>
<td>(76.74)</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>421.9</td>
</tr>
</tbody>
</table>

**BAAQMD GHG Threshold of Significance**

- None for construction

**Threshold Exceeded?**

- -

**Notes:** See Appendix B and C for detailed results.

CO₂E – carbon dioxide equivalent

As shown in Table GHG-1, the estimated GHG emissions generated during the construction of the Revised Project would be approximately 236 MT CO₂E. The Approved Project previously proposed for the same location would have resulted in approximately 159 MT CO₂E.

Implementation of the Revised Project would, therefore, result in a slight increase of approximately 77 MT CO₂E in GHG emissions generated during construction. Based on the estimated GHG emissions presented in Table GHG-1, implementation of the Revised Project would not represent a substantial change in constructions emissions and therefore, would not alter the impact conclusions of the previous 2011 Final MND. When run in CalEEMod, the Revised Project, as shown in Table GHG-1 would generate an estimated 421.9 MT CO₂E of GHG emissions. As there are no GHG thresholds for construction emissions the difference in emissions would not alter the impact conclusions of the previous 2011 Final MND. However, the increase in construction emissions are accounted for in the operational emissions, which do have thresholds, and are reflected in Table GHG-2 below.

**Operational GHG Emissions Analysis**

The Revised Project would include the development of an additional 178 storage units, however the Approved Projects residential unit analyzed in the Schwan Self-Storage Project Final MND has been removed.

Operation of the Approved Project or the Revised Project would result in GHG emissions from area sources, energy use, and mobile sources. GHG emissions associated with vehicle travel to and from the project site were estimated using URBEMIS and CalEEMod and were based on the trip generation estimates provided by ATE (ATE 2017) for the Revised Project. URBEMIS and CalEEMod default values for mobile sources were used consistent with the assumptions used in the air quality impact analysis (Appendix B - Section 3.2.2, Operational Emissions Analysis).

Operation of gasoline-powered landscape maintenance equipment also produces GHG emissions, although minimal. The estimation of proposed non-mobile operational emissions was
based on URBEMIS land use defaults and total area (i.e., square footage) of the proposed land use. Default natural gas usage factors in URBEMIS and CalEEMod were used for proposed building operation.

The estimated operational project-generated GHG emissions from area sources (landscape maintenance), energy usage, and motor vehicles for the Approved Project compared with operational GHG emissions of the Revised Project for 2019 (i.e., first full year of project operation) are shown in Table GHG-2, Estimated Annual Operational Greenhouse Gas Emissions for the Approved Project and Revised Project. The 2011 FMND used URBEMIS to estimate project-generated emissions, the results of which are presented in Table 6 for informational purposes. For the purpose of this analysis, the Revised Project was modeled using the same version of URBEMIS to estimate the net emissions that would result with the change from the Approved Project. Additionally, for accurate comparison to current thresholds the Revised Project was modeled in CalEEMod, as well.

Table GHG-2
Estimated Annual Operational Greenhouse Gas Emissions for the Approved Project and Revised Project

<table>
<thead>
<tr>
<th></th>
<th>CO₂E metric tons per year</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Approved Project (Final MND)</strong></td>
<td></td>
</tr>
<tr>
<td>Area Sources</td>
<td>146.72</td>
</tr>
<tr>
<td>Mobile Sources</td>
<td>230.58</td>
</tr>
<tr>
<td>Amortized Construction Emissions</td>
<td>5.30</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>382.60</td>
</tr>
<tr>
<td><strong>Revised Project (Urbemis)</strong></td>
<td></td>
</tr>
<tr>
<td>Area Sources</td>
<td>118.94</td>
</tr>
<tr>
<td>Mobile Sources</td>
<td>179.70</td>
</tr>
<tr>
<td>Amortized Construction Emissions</td>
<td>7.86</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>306.50</td>
</tr>
<tr>
<td>GHG Significance Threshold Exceeded?</td>
<td></td>
</tr>
<tr>
<td><strong>No</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Net Annual Project Emissions (Revised Project Increase)</strong></td>
<td>76.10</td>
</tr>
<tr>
<td><strong>Revised Project (CalEEMod)</strong></td>
<td></td>
</tr>
<tr>
<td>Area Sources</td>
<td>315.24</td>
</tr>
<tr>
<td>Mobile Sources</td>
<td>230.49</td>
</tr>
<tr>
<td>Amortized Construction Emissions</td>
<td>14.06</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>559.79</td>
</tr>
<tr>
<td>GHG Significance Threshold Exceeded?</td>
<td></td>
</tr>
<tr>
<td><strong>No</strong></td>
<td></td>
</tr>
</tbody>
</table>

**Notes:** See Appendix B and C for detailed results.  
CO₂E carbon dioxide equivalent

**Urbeemis:**
The Approved Project evaluated in the 2011 Final MND was estimated to generate 383 MT CO₂E per year including amortized construction GHG emissions. Therefore, the 2011 Final MND was found to be below the threshold of 1,100 MT CO₂E per year threshold. As shown in Table GHG-2, estimated annual GHG emissions for the Revised Project in 2019 would be approximately 307 MT CO₂E per year. The Revised Project would result in a decrease of GHG
emissions when compared to the 2011 Final MND. It should be noted that although the Trip Memo (ATE 2017) showed that the Revised Project would have higher average daily traffic than the Approved Project, the 2011 Final MND modelled traffic emissions based on a higher traffic rate than what was estimated in the 2017 Trip Memo for the Revised Project. Therefore, the Revised Project would also not exceed the significance threshold of 1,100 MT CO₂E per year. The implementation of the Revised Project would result in a decrease in GHG emissions during operation. The GHG analysis presented above would not represent a substantial change in operational emissions and therefore, would not alter the impact conclusions of the previous 2011 MND.

**CalEEMod:**
When modelled in the current version of CalEEMod, using the same assumptions, the Revised Project resulted in an estimated annual GHG emissions of approximately 559.79 MT CO₂E. Even though the estimated annual GHG emissions are higher it remains below the significance threshold of 1,100 MT CO₂E per year. As the Revised Project would still not exceed the GHG thresholds, as shown in the GHG analysis presented above, it would not represent a substantial change in operational emissions and therefore, would not alter the impact conclusions of the previous 2011 MND.

*Project-Specific Impacts:* All previously identified impacts related to construction and operational emissions in the Schwan Self-Storage Project Final MND are still expected to occur.

*Cumulative Impacts:* Cumulative GHG emissions impacts remain the same.

*Mitigation Measures:* As the impacts associated with greenhouse gas emissions are still considered less than significant, no mitigation is required or recommended.

*Residual Impacts:* Residual impacts as a result of greenhouse gas emissions would remain less than significant under the Revised Project.

**HAZARDS AND HAZARDOUS MATERIALS**

The Schwan Self-Storage Project Final MND describes the hazardous materials/risk of upset setting relative to the Project, and determined that the project would have no impact on hazards. The Revised Project does not include any elements that would affect hazardous materials/risk of upset in a new or different manner. Therefore, no new impacts are expected to occur and no mitigation measures are necessary.

*Project-Specific Impacts:* All previously identified impacts in the Schwan Self-Storage Project Final MND are still expected to occur.

*Cumulative Impacts:* Cumulative hazardous materials/risk of upset impacts remains the same.

*Mitigation Measures:* As the impacts associated with potential hazards and hazardous materials are still considered less than significant no mitigation is either required or recommended.

*Residual Impacts:* Residual impacts as a result of hazards and hazardous materials would remain less than significant.

**HYDROLOGY AND WATER QUALITY**

The Schwan Self-Storage Project Final MND assesses impacts to surface drainage, surface water and groundwater quality, and flooding resulting from the Project. The Project would develop buildings, access roads, driveways, surface parking lots, landscape and hardscape
areas and utilities, as well as drainage structures necessary to detain and retain surface water and to convey surface water across the Project site to the point-of-concentration along or outside the project site boundaries. Hydrology, drainage, and water quality conditions that would raise environmental issues would be addressed through the standard hydrology study/review/approval process and strict compliance with applicable regulations. City wide implementation of Storm Water Pollution Prevention Plan (SWPPP) and Central Coast Regional Water Quality Control Board (CCRWQCB) standards would be required to address potential impacts. With these requirements and mitigation measures, hydrology and water quality impacts have been reduced to levels of less than significant.

The Revised Project would not result in any new impacts related to surface water quality and will increase the amount of pervious surface on site, therefore, Revised project would not involve impacts beyond those identified in the Schwan Self-Storage Project Final MND.

**Project-Specific Impacts:** All previously identified impacts related increased stormwater runoff and flooding in the Schwan Self-Storage Project Final MND are still expected to occur.

**Cumulative Impacts:** Cumulative hydrology and water quality impacts remain the same.

**Mitigation Measures:** The following Hydrology and Water Quality mitigation measures related to stormwater runoff prevention, stormwater treatment, and BMPs continue to be applicable to the Revised Project: HWQ - 1, -2, -3, and -4.

**Residual Impacts:** With implementation of above mitigation measure, residual impacts associated with potentially significant water quality impacts would be reduced to less than significant levels.

**LAND USE AND PLANNING**

The Schwan Self-Storage Project Final MND evaluated the Project’s compatibility with existing land uses in the Project area and its consistency with applicable land use policies. The Schwan Self-Storage Project Final MND analyzed the existing land use conditions, and review of applicable plans and ordinances.

The Schwan Self-Storage Project Final MND also describes the land use setting relative to the Project, land use impacts that would result from the Project, and mitigation measures that would reduce potentially significant and potentially adverse but not significant impacts.

With the exception of the setback and landscaping modifications, the Approved Project complied with all zoning ordinance requirements, and as the modifications to zoning standards were subject to Planning Commission approval, no impacts to consistency with the zoning ordinance would have occurred as a result of the Approved Projects implementation. The Revised Project will have a reduced building footprint, however the addition of the basements will increase the overall building square footage. The changes to the building square footage and other minor changes, will not impact the Revised Projects consistency with land use policies, therefore, no new impacts are expected to occur. As mentioned in the existing setting of Land Use and Planning section of the Final MND, General Plan policy LU 4.6 and many policies within the Goleta Old Town Redevelopment Plan (OTRP) cite this property for redevelopment, cessation of unpermitted uses and implementation of mitigation of adverse impacts on adjacent residential properties to the maximum extent feasible. The Revised Project would also cease any unpermitted uses on site as well as all existing permitted uses on site and replace them with the permitted mini-storage use. This sort of use is a lower-intensity industrial use with few vehicle trips, lower emissions, and very low noise levels. As such the Revised
Project would still achieve policy consistency with these elements of the General Plan, zoning ordinance, and OTRP. Additionally, the Revised Project will maintain the same 50-foot creek buffer as the Approved Project.

Parking
Long Term Parking
While the 2011 Final MND analyzed parking, parking is no longer a CEQA issue. The following information is provided for informational purposes. The City’s parking requirements do not contain a specific parking calculation for the mini storage use however; the ordinance does allow the Director of the Planning and Environmental Review Department to determine the appropriate parking requirement in such instances. As such, for the Approved Project, the Director approved the ITE Trip Generation Manual’s recommendation of 1.39 spaces per 100 storage units for this project in addition to the City’s zoning ordinance requirement that each residential unit have two parking spaces. Required parking for the Approved Project was 12 spaces (685 storage units/100 x 1.39 spaces = 10 spaces + 2 spaces for the residence = 12 spaces) and 28-spaces (including 2 for the manager’s apartment) were provided for the Approved Project, exceeding this parking requirement. Due to site changes the Revised Project will lose 5 parking spaces. Required parking for the Revised Project the same at 12 spaces (863 storage units/100 x 1.39 spaces = 12 spaces) due to the removal of the manager’s unit but increase in the number of storage units. 25-spaces are proposed for the Revised Project, therefore the Revised Project would continue to exceed the parking requirement. As the Revised Project has more than adequate parking capacity, no parking impacts will occur.

Project-Specific Impacts: All previously identified impacts in the Schwan Self-Storage Project Final MND are still expected to occur.

Cumulative Impacts: Cumulative land use impacts remain the same.

Mitigation Measures: Mitigation Measures to address encroachment of the fence and gates into the SPA addressed in the Biological Resources section continue to be applicable to the Revised Project.

Residual Impacts: With implementation of the mitigation measures identified in the Biological Resources section of this document, residual project land use and planning conflicts would be less than significant.

MINERAL RESOURCES

The Schwan Self-Storage Project Final MND did not identify any known mineral resources on the project site and stated the Approved Project would not result in the loss of a locally important mineral resource recovery site.

Project-Specific Impacts: As with the Approved Project, the Revised Project would not result in the loss of availability of any known mineral resource or identified resource recovery site. No such impacts would occur.

Cumulative Impacts: The Revised Project would have no impact on any cumulative loss of mineral resources or resource recovery sites.

Mitigation Measures: No mitigation measures are required or recommended.
Residual Impact: None

NOISE

The Schwan Self-Storage Project Final MND describes the noise setting relative to the Project, impacts related to noise that would result from the Approved Project, and mitigation measures that would reduce potentially significant impacts. The proposed Revised Project does not include any elements that would affect noise in a new or different manner. Therefore, no new impacts would be expected to occur and no changes to mitigation measures are necessary. The current measures will mitigate the noise impacts to a less than significant level.

Project-Specific Impacts: All previously identified impacts in the Final MND are still expected to occur, with the exception of those related to the manager apartment, as that has been removed from the project.

Cumulative Impacts: Cumulative noise impacts remain the same.

Mitigation Measures: The following Noise mitigation measures related to Construction Noise; Operational Noise – Project Traffic Noise Generation; Commercial Operations Noise; On-Site Ambient Noise Exposure; Non-Commercial Common Area; and Vibration continue to be applicable to the Revised Project: N - 1, -2, -3, -4, -5, -6, -7, -8, and -9.

Residual Impacts: With implementation of mitigation measures described above, the Revised Project’s noise impacts would remain the same, less than significant.

POPULATION AND HOUSING

The Schwan Self-Storage Project Final MND concluded the Approved Project would not result in the potential for significant impacts related to Population and Housing, because only 2-4 employees were envisioned to be employed at the facility and one family or individual in the manager’s unit. The anticipated increase in employees resulting from the project would be so minimal that no measurable impact due to population growth in the area would occur. Because the Revised Project does not change the expected number of employees and removed the manager’s unit, the projected population resulting from the project would remain the same.

Project-Specific Impacts: As with the Approved Project, the Revised Project no new roads or infrastructure that could support other new development would be required. As such, impacts resulting from potential inducement of population growth in the area would be considered less than significant. Also, the Revised Project would not displace any existing housing units or require the displacement of any people thereby necessitating the construction of replacement housing.

Cumulative Impacts: The Revised Project is not expected to result in any significant contribution to cumulative housing and population impacts either within the City or the surrounding Goleta Valley.

Mitigation Measures: No mitigation measures are required or recommended.

Residual Impact: The Revised Project would not result in any significant residual impacts on housing and population either within the City or the surrounding Goleta Valley.
PUBLIC SERVICES

The Schwan Self-Storage Project Final MND analyzed potential impacts to services of fire protection, police protection, libraries, and schools. The Revised Project does not change the number of employees and removes the manager’s unit, thus demand on public services would decrease as compared to the Approved Project. Therefore, no new impacts would be expected to occur and no changes to mitigation measures are necessary.

*Project-Specific Impacts:* All previously identified impact in the Schwan Self-Storage Project Final MND is still expected to occur.

*Cumulative Impacts:* Cumulative public facilities impacts remain the same.

*Mitigation Measures:* The following Public Service mitigation measures related to fire department access and fire suppression infrastructure continue to be applicable to the Revised Project: PS - 1 and -2.

*Residual Impacts:* All residual impacts would remain less than significant.

RECREATION

The Schwan Self-Storage Project Final MND analyzed the Project’s impacts on recreational facilities in the City. The Revised Project will not result in increased population. Therefore, no new impacts would be expected to occur and no changes to mitigation measures are necessary.

*Project-Specific Impacts:* All previously identified impact in the Schwan Self-Storage Project Final MND is still expected to occur.

*Cumulative Impacts:* Cumulative recreation impacts remain the same.

*Mitigation Measures:* No mitigation measures were required in the Schwan Self-Storage Project Final MND and, therefore, no new mitigation measures would be required for the Revised Project.

*Residual Impacts:* The Schwan Self-Storage Project’s impacts were considered less than significant prior to mitigation. The Revised Project would remain the same.
TRANSPORTATION AND TRAFFIC

The Schwan Self-Storage Project Final MND identified potentially significant impacts (Class II), and less than significant impacts (Class III) related to hazards, emergency access, and circulation capacity within the City. See Appendix D, *Trip Generation Comparison and Soil Export Route Evaluation* (ATE 2017) for details.

**Operational**
The Schwan Self-Storage Project Final MND anticipated development of 685 storage units and a manager's apartment unit. The Revised Project has increase the number of storage units to 863 and eliminated the manager's apartment.

<table>
<thead>
<tr>
<th>Project</th>
<th>ADT</th>
<th>A.M. Peak Hour Trips</th>
<th>P.M. Peak Hour Trips</th>
</tr>
</thead>
<tbody>
<tr>
<td>Approved Project</td>
<td>178</td>
<td>15</td>
<td>15</td>
</tr>
<tr>
<td>Revised Project</td>
<td>216</td>
<td>17</td>
<td>17</td>
</tr>
<tr>
<td>Net Change</td>
<td>+38</td>
<td>+2</td>
<td>+2</td>
</tr>
</tbody>
</table>

The data presented in Table TT-1 above show that the Revised Project generates 38 more average daily trips, 2 more A.M. peak hour trips and 2 more P.M. peak hour trips when compared to the Approved Project analyzed under the Schwan Self-Storage Project Final MND. The small amount of additional traffic generated by the Revised Project would not have the potential to generate significant roadway or intersection impacts based on the City of Goleta traffic impact thresholds. Therefore, due to the insignificant increase in traffic produced, no new operational impacts will occur and no changes to mitigation measures are necessary.

**Soil Export**
The Revised Project will require export of 11,415 cubic yard (CY) of soil, due to the additional excavations required for the basements, from the site to a receiver site. The material would be exported off-site over a 11-day period. Inbound trucks accessing the site would exit U.S. 101 at the SR 217 interchange, travel west on Hollister Avenue to Kellogg Avenue, and proceed north to the site. Inbound trucks from the north would exit U.S. 101 at the Patterson Avenue interchange, travel north on Patterson Avenue to the U.S. 101 northbound on-ramp and merge onto the SR 217 off-ramp to access Hollister Avenue, proceed westerly to Kellogg Avenue and then proceed northerly to the site. Outbound trucks would travel southerly on Kellogg Avenue, make a left-turn and travel westerly on Hollister Avenue to the SR 217 northbound on-ramp. Trucks traveling south on US 101 would use the SR 217 ramp to U.S. 101 and trucks traveling north on U.S. 101 would exit at Patterson Avenue, proceed north on Patterson Avenue and turn left at the U.S. 101 northbound on-ramp.

It is estimated that a maximum of 760 trucks would arrive and depart at the project site over the haul period (ATE 2017). Based on truck carrying capacity the soil export would generate an average daily traffic (ADT) volume of 138 trucks per day over a 11-day haul period.
As shown in Table TT-2, the Project would temporarily add an additional 138 ADT to these two segments over the 11-day haul period. Even during the limited period, the additional truck traffic would not significantly affect operations along Kellogg Avenue or Hollister Avenue in the project vicinity based on City Impact Thresholds. Additionally, hauling hours would be limited to avoid impacts to the area intersections during the A.M. and P.M. peak commute periods. The soil export would not create any additional impacts and no changes to mitigation measures are necessary. While the truck trips would create additional wear and tear on the impacted roads, roadway wear and tear is not an analyzed CEQA issue. However, subject to the approval of the Project will be conditioned address or offset and damages to roadways.

Overall, impacts from development of the site on the circulation system capacity would be similar and the proposed project would not create additional impacts related to the circulation system beyond those identified in the Schwan Self-Storage Final MND.

**Project-Specific Impacts:** All previously identified impacts in the Schwan Self-Storage Project Final MND are still expected to occur.

**Cumulative Impacts:** All previously identified impacts in the Schwan Self-Storage Project Final MND are still expected to occur.

**Mitigation Measures:** The following mitigation measures related to Construction Parking and Union Pacific Railroad Safety continue to be applicable to the Revised Project: TT-1, -2, and -3.

**Residual Impacts:** With implementation of the mitigation measures identified above, the Revised Project’s traffic impacts would continue to be reduced to a less than significant level.

**UTILITIES AND SERVICE SYSTEMS**

The Schwan Self-Storage Project Final MND addressed Project impacts on water supply, wastewater treatment, and solid waste disposal. The evaluation was based on Project estimated demand for utilities relative to the supplies and capacities of the systems and facilities that would provide service to the Schwan Self-Storage Project.

**Water Supply**

On April 19, 2017, the Goleta Water District (GWD) issued Preliminary Water Service Determination stating that the project parcel has adequate historical water credit for the estimated potable water demand associated with the DP RV. Accordingly, there is sufficient water to serve the Revised Project.
Wastewater Treatment
The Goleta West Sanitary District (GWSD) and the Goleta Sanitary District (GSD) would provide wastewater collection and treatment, respectively, for the Project site. Based on the analysis provided in the Schwan Self-Storage Final MND impacts on wastewater collection would be less under the Revised Project due to the removal of the manager’s apartment unit, which accounted for half of the total wastewater generation of the Approved Project. With the additional storage units Revised Project Impacts would be relatively similar to or less than the Approved Project. Therefore, no new impacts would be expected to occur and no changes to mitigation measures are necessary.

Solid Waste
Solid waste generation would increase by 40.01 tons/year as a result of the Revised Project. With a 50% recycling the total increase in waste sent to landfill would be 20 tons/year. The total Revised Project solid waste generation, accounting for the 50% credit, would be 108.5 tons/year. As this is less than the 196 tons/year threshold, the solid waste generation impact remains less than significant. Solid Waste Management Plans for construction and demolition waste and ongoing operations will continue to be required as mitigation measures for the Revised Project. No new mitigation measures or changes to existing mitigation measures are necessary.

Project-Specific Impacts: All previously identified impacts in the Schwan Self-Storage Project Final MND are still expected to occur.

Cumulative Impacts: Cumulative public facilities impacts remain the same.

Mitigation Measures: The following mitigation measures related to utility service connections, Water Conservation, and Waste Management continue to be applicable to the Revised Project: UTIL-1, -2, -3, -4, -5, -6, -7, and -8.

Residual Impacts: With implementation of the mitigation measures identified above, the revised project’s contribution to cumulative solid waste impacts, would be considered less than significant.

CONCLUSION

Impacts associated with the DP RV for the Revised Project are within the parameters considered in the Schwan Self-Storage Project Final MND. Consequently, the Revised Project would not create any new significant impacts or increase the severity of impacts previously identified in the Schwan Self-Storage Project Final MND. As a result, no additional mitigation measures are required for the Revised Project. No substantial changes have occurred with respect to the circumstances identified in the Schwan Self-Storage Project Final MND under which the Revised Project would require major revisions. This Addendum identifies the changes to the Schwan Self-Storage Project and the associated Schwan Self-Storage Project Final MND that would occur under the Revised Project. Therefore, this Addendum is the appropriate environmental document under CEQA for the proposed Project.
REFERENCES

City of Goleta (City)


2011 Schwan Self-Storage Project Final Mitigated Negative Declaration. Available at: City of Goleta City Hall 130 Cremona Drive Suite b, 93117, CA.

County of Santa Barbara (County)


Santa Barbara County Air Pollution Control District (SBCAPCD)

2015a Scope and Content of Air Quality Sections in Environmental Documents. Prepared by the Technology and Environmental Assessment Division. Updated April 2015.


APPENDICES

Appendix A - Schwan Self-Storage Project Final MND (October 14, 2011)
Appendix B - Schwan Self-Storage Project - Air Quality and Greenhouse Gas Emissions Assessment Memorandum (Dudek June 29, 2017)
Appendix C - Schwan Self-Storage CalEEMod Report (CalEEMod.2016.3.1)
Appendix D - Trip Generation Comparison and Evaluation of Proposed Soil Export Truck Route for the Schwan Self-Storage Project (ATE August 1, 2017)