



## **ATTACHMENT G**

# **UNIVERSITY DISTRICT SPECIFIC PLAN (UDSP) ENVIRONMENTAL IMPACT REPORT (EIR) 2025 ADDENDUM**

# **Addendum to Final Environmental Impact Report**

SCH No. 2008101083

## **University District Specific Plan Amendment (CubeSmart Self-Storage & District Expansion)**

**SP24-0003, SP25-0001, GPA25-0002, TA24-0004,  
CUP24-0005**



City of San Marcos

September

Prepared by:

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## 1.0 INTRODUCTION

### 1.1 PURPOSE AND SCOPE

This document is an addendum to the Final Program Environmental Impact Report (FEIR) (State Clearinghouse No. 2008101083) certified by the City of San Marcos (City) in 2009 for the University District Specific Plan project. The purpose of this document is to determine if the proposed Specific Plan Amendment to the University District Specific Plan (UDSP) to allow development of the CubeSmart self-storage facility (proposed project) would result in any new impacts not previously identified in the FEIR or subsequent addenda list in Section 1.3 below. The attached checklist was used as a screening tool to determine that an Addendum was the appropriate document for California Environmental Quality Act (CEQA) compliance.

### 1.2 FINDINGS OF THIS INITIAL STUDY/ADDENDUM

Based upon the information provided in the attached Checklist/Addendum, the implementation of the proposed project will not result in any new significant impacts and the conclusions in the FEIR and subsequent addenda prepared for the University District Specific Plan project are valid for this project.

#### 1.2.1 Use of an Addendum to a Previously Certified EIR

Section 15164 of the State CEQA Guidelines states that an Addendum to an EIR shall be prepared “if some changes or additions are necessary, but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.” Section 15162 of the State CEQA Guidelines identifies the conditions that require preparation of a subsequent EIR. A proposed change in a project will require preparation of a subsequent EIR if:

1. The change in the project is substantial.

Substantial changes in the project are those that would require major revisions of the previous EIR due to the involvement of new significant environmental effects, or if a substantial increase in the severity of previously identified significant effects has occurred.

2. The circumstances under which the project is undertaken have substantially changed.

Substantial changes in circumstances are defined as those that would require major revisions of the previous EIR in order to describe and analyze new significant environmental effects, or any changes that would cause a substantial increase in the severity of the previously identified significant effects.

3. New information of substantial importance, which was not known and could have not been known, with the exercise of reasonable diligence at the time the previous EIR was certified, shows:

- A. The project will have one or more significant effects not discussed in the previous EIR;
- B. The significant effects previously examined will be substantially more severe than identified in the previous EIR;
- 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 proponent declines to adopt the mitigation measures or alternatives; or

- D. Mitigation measures or alternatives that are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponent declines to adopt the mitigation measures or alternatives.

If none of the above conditions are met, the City is not required to prepare a subsequent EIR. Rather, the City may prepare a Mitigated Negative Declaration or an Addendum, or the City may decide that no further environmental documentation is necessary.

This Checklist/Addendum has evaluated each of the issues addressed in the FEIR. Additionally, new thresholds in Appendix G of the CEQA Guidelines related to energy, forestry resources, transportation (vehicle miles traveled), tribal cultural resources, and wildfire that were adopted by the State of California after adoption of the FEIR have also been analyzed.

Based on this analysis and the information contained herein, there is no evidence that the proposed project requires major changes to the FEIR. Comparison of the previous project with the proposed project, as described in Section 2.4 of this document, indicates that there are no new significant environmental impacts or more severe significant environmental impacts associated with implementation of the proposed project.

This Checklist/Addendum relies on use of an Environmental Checklist Form (Form), as suggested in Section 15063 (d)(3) of the State CEQA Guidelines. The Form is used to evaluate whether or not there are any new or more severe significant environmental effects associated with implementation of the proposed project and proposed amendments; and to review whether there is new information or circumstances that would require preparation of additional environmental documentation in the form of a subsequent or supplemental EIR; or if an Addendum is appropriate.

Section 3.0 of this document contains this analysis and explains the basis for each response to the questions on the Form.

### **1.3 EXISTING DOCUMENTS TO BE INCORPORATED BY REFERENCE**

Section 15150 of the State CEQA Guidelines permits an environmental document to incorporate by reference other documents that provide relevant data.

The documents outlined in this section are hereby incorporated by reference, and the pertinent material is summarized throughout this Checklist/Addendum, where that information is relevant to the analysis of impacts of the project. Any document incorporated by reference is available for review at the City of San Marcos, Planning Division.

- University District Specific Plan Final Environmental Impact Report. 2009 (SCH No. 2008101083).
- University District Rock Crusher Conditional Use Permit Mitigated Negative Declaration. 2011 (SCH No. 2011081083).
- University District Specific Plan Amendment Initial Study and Final EIR Addendum. 2014.
- University District Specific Plan Block 3 (AASP 17-001 and CUP 17-005) Final EIR Addendum. August 2017.
- University District Specific Plan - Mesa Rim Substantial Conformance. 2019.

- University District Specific Plan Amendment (SP21-0002 / SP22-0002 / GPA21-0005 / SM21-0002 / SDP21-0003) Final EIR Addendum. 2022.
- Negative Declaration #99-527 for CUP 99-429/TA 00-42 (Hampton Inn). December 23, 1999.

#### **1.4 CONTACT PERSON**

The Lead Agency for the Checklist/Addendum for the proposed project is the City of San Marcos. Any questions should be referred to:

Chris Garcia, Senior Planner  
City of San Marcos  
1 Civic Center Drive  
San Marcos, CA 92069  
Tel: (760) 744-1050 ext. 3237  
Email: [cgarcia@san-marcos.net](mailto:cgarcia@san-marcos.net)

## 2.0 PROJECT DESCRIPTION

### 2.1 PROJECT SITE AND SETTING

The project site is located in the City of San Marcos, in the northern portion of San Diego County. The project area is within the University District Specific Plan (UDSP) planning area (Figure 1). The approximate 203-acre Specific Plan area is situated in the heart of San Marcos, with parcels located east and west of Twin Oaks Valley Road. The UDSP planning area is bounded by State Route 78 (SR-78) and San Marcos Creek on the north and Barham Drive and Discovery Hills on the south. California State University San Marcos (CSUSM) is located adjacent to the southeast section of the UDSP planning area. All figures referenced in this document are located at the end of the document.

The proposed project addresses three specific parcels, one within, and two adjacent to, the UDSP planning area. APN 220-201-90-00 is a 2.71-acre parcel located at 337 E. Carmel Street and is within the current UDSP area. This parcel is the site for the proposed CubeSmart self-storage facility, which is discussed in this document (Figure 2). The proposed CubeSmart site is bounded by E. Carmel on the north, light industrial and industrial on the east, the future Carmel Enterprise affordable housing project on the south, and the NCTD SPRINTER line and a parcel owned by NCTD on the west. The proposed CubeSmart site was recently graded and stormwater runoff transmission and containment structures were constructed in conjunction with a previously approved project. There is a 35-foot-wide easement that traverses the CubeSmart project site associated with these stormwater improvements.

APNs 221-110-67-00 and 221-110-68-00 are developed with the existing Hampton Inn at 123 E. Carmel Street. These parcels total 2.36 acres and are developed with a three-story 69-room hotel and associated parking and landscaping. The Hampton Inn site is bounded by E. Carmel on the north and west, the San Diego County Office of the Assessor-Recorder on the east, and the Block 1 area of the UDSP to the south.

### 2.2 PROPOSED DISCRETIONARY ACTIONS, PERMITS & CONSULTATION

The proposed project requires approval of the discretionary permits and approvals by the City of San Marcos:

- General Plan Amendment (Land Use and Community Design Element and Appendix D) – (GPA25-0002)
- Specific Plan Amendment – University District Specific Plan (SP24-0003)
- Specific Plan Amendment – Heart of the City Specific Plan (SPA25-0001)
- Zoning Text Amendment – SMMC Section 20.400.180 (TA23-0004)
- Conditional Use Permit - Self-Storage Facility (CUP24-0005)

Each of these requested approvals is discussed in more detail in Section 2.4, below.

### 2.3 PROJECT BACKGROUND

#### University District Specific Plan Area

In 2009, the City of San Marcos (City) approved the UDSP and certified the FEIR (SCH No. 2008101083). In 2011 a Conditional Use Permit (CUP) for use of a rock crusher and modified grading operations at the site was approved and a Mitigated Negative Declaration (MND) was adopted for the CUP (SCH No. 2011081083). In 2014, an Addendum to the certified FEIR was prepared for a Specific

Plan Amendment to refine land uses, development intensities and the circulation network within the specific plan area, which resulted in an overall reduction in development intensities. In 2017 an Addendum to the certified FEIR was prepared for an Administrative Amendment and Conditional Use Permit (CUP 17-0005) to construct a 6-story mixed use building consisting of classrooms, offices, and retail space, a parking structure and pedestrian facilities. In 2019 a Substantial Conformance document was prepared for the Mesa Rim Climbing Center. In 2022 an Addendum to the certified FEIR was prepared for a General Plan Amendment, two Specific Plan Amendments, tentative subdivision map and a site development plan to modify the development intensities and increase building heights in some areas, which resulted in an overall reduction in development intensities. The 2022 FEIR Addendum also addressed adding two parcels APN 220-201-90-00 (Zirpolo) and APN 220-202-18-00 (NCTD) to the UDSP planning area. Cumulatively, these amendments to the UDSP have resulted in an overall reduction in development intensity and trip generation (114,697 ADT vs. 58,517 ADT, a 48% reduction).

## 2.4 PROJECT DESCRIPTION

The proposed project is the approval of a General Plan Amendment, a Specific Plan Amendment to the UDSP, a Specific Plan Amendment to the Heart of the City Specific Plan (HOCSP), a Zoning Text Amendment, and a Conditional Use Permit. Each of these requested approvals is discussed below.

### General Plan Amendment

The General Plan Amendment (GPA) proposes changes to the Land Use and Community Design Element. These changes are briefly summarized below:

- Change the boundary of Figures 2-3 and 2-5 to reflect moving APNs 221-110-67-00 and 221-110-68-00 (Hampton Inn) out of the HOCSP and into the UDSP.
- Revise the Business Park (BP) acreage in the HOCSP.

### Specific Plan Amendment - University District Specific Plan

Appendix A1 includes a track-changes version of the UDSP noting the proposed changes to text and figures. The key changes are briefly summarized below:

- Adding 2.36 acres to the boundary of the Specific Plan area to incorporate APNs 221-110-67-00 and 221-110-68-00 (the existing 69 room Hampton Inn).
- Introduction of a self-storage overlay zone to allow for the relocation of the self-storage facility from 235 E. Carmel Street to 337 E. Carmel Street. The overlay zone includes development standards/guidelines for the new storage building and requires the issuance of a conditional use permit.
- Revisions to Chapter V of the UDSP to reflect an updated Parking and Transportation Demand Management (PTDM) Policies that implements the City's Transportation Demand Management (TDM) Policy and Ordinance.

### *APNs 221-110-67-00 and 221-110-68-00 (Hampton Inn)*

As noted above, the project applicant is proposing to remove two parcels, totaling approximately 2.36 acres, from the Heart of the City Specific Plan (HOCSP) and add them to the UDSP. Development of the Hampton Inn was analyzed in Negative Declaration ND-#99-527, which was adopted by the San Marcos City Council on February 22, 2000. The Hampton Inn parcels would be assigned a Mixed-Use Building A/Commercial Building use within the UDSP with a building height of 3 stories (30-foot



minimum) to 5 stories (70-foot maximum). The proposed project does not propose any redevelopment of the Hampton Inn site as part of the requested actions. The existing 3-story Hampton Inn would continue to operate as it currently does. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

### **Specific Plan Amendment - Heart of the City Specific Plan (HOCSP)**

Appendix A2 includes a track-changes version of the HOCSP presenting the proposed revisions to the document. Revisions to the HOCSP include:

- Figure 2 – Land Use Plan – update boundary to remove APNs 221-110-67-00 and 221-110-68-00 (Hampton Inn site).
- Table 1 – Land Use Statistical Summary – update acreage to remove the approximate 2-acre Hampton Inn site from the Business Park (BP) designation.
- Section 2.3.1 – Remove reference to the hotel site at the southwest corner of Twin Oaks Valley Road and SR-78 since this is part of the UDSP.

### **Zoning Text Amendment**

Appendix A3 includes a track-changes version of the proposed revisions to Section 20.400.180 of the San Marcos Municipal Code. These changes would exempt self-storage in the Self-Storage Overlay Zone of the UDSP from the criteria and minimum requirements in Section 20.400.180.

### **Conditional Use Permit**

A Conditional Use Permit (CUP) is required to operate a self-storage facility within the University District Self-Storage Overlay Zone. The CUP establishes operational and design criteria for the facility. The proposed project includes a relocation of the existing CubeSmart facility located at 235 E. Carmel Street. The CubeSmart project is also associated with TPM24-0002 which is subdividing the current lot into two parcels (one for the proposed self-storage facility and the other for the Carmel Enterprise Affordable Housing project). The Tentative Parcel Map (TPM) was approved concurrently with SDP24-0002.

### **CubeSmart Self Storage**

The following section provides information about the proposed self-storage facility (CubeSmart) which is one component of the proposed project.

#### ***Project Design***

The proposed CubeSmart project would provide 104,600 square feet (s.f.) of storage space within a 3-story (37 foot maximum height) building (Building A) and 6,600 s.f. of storage space within a 1-story building (12 feet high) (Building B) for a combined size of 111,200 s.f. An office is proposed in the northeast corner of Building A. Rooftop metal screening would visually shield the proposed rooftop mechanical ventilation units (HVAC). The site plan is presented in **Figure 3**. The proposed project would include a relocation of the existing CubeSmart self-storage facility located at 235 E. Carmel Street, which is a single-story building with approximately 78,000 s.f. of storage space.

Proposed building materials include concrete masonry units with a paint finish, metal accents and metal roll up doors. Renderings of the building design are included as **Figures 4a and 4b**.

Access to the CubeSmart site would be from a driveway on E. Carmel Street. Access to the self-storage buildings would be controlled via entrance and exit gates with a keypad. The CubeSmart project includes 12 parking spaces. The project design includes rooftop solar.

The landscape concept plan includes a mix of trees, shrubs, vines and groundcover. The project would plant 33 trees including desert willow, New Zealand Christmas tree, and southern live oak. Approximately 23.5 percent of the CubeSmart project site would be landscaped/unpaved areas. The proposed landscape plan complies with the City's Water Efficient Landscape Ordinance. The project design includes a combination of a 6-foot-high steel tube fencing and a 5-foot high solid masonry screen wall on top of a 10-foot max exposed retaining wall along the project site's southern boundary.

### ***Stormwater Management***

As described in the Storm Water Quality Management Plan (SWQMP), which is located in Appendix G, runoff generated by the proposed CubeSmart project would be conveyed via a proposed private storm drain system into two proposed private underground detention systems (UD-1 and UD-2). A flow control/bypass structure downstream of each underground detention system would route the runoff into a corresponding proposed private proprietary biofiltration system (PBF-1 & PBF-2). Runoff would then continue downstream via a proposed private storm drain system into an existing box culvert which flows under E. Carmel Street and State Route 78 (SR-78) and continues through an existing reinforced concrete pipe which ultimately discharges to San Marcos Creek.

### ***Water Line Upgrade***

To meet fire flow requirements, the project will upgrade 1,600 feet of waterline within E. Carmel Street between the proposed CubeSmart project site and Venture Street. The improvement will upgrade the existing 6-inch ACP to a 12-inch PVC. This improvement would occur beneath and existing paved street.

### ***Construction***

CubeSmart project construction is anticipated to start in Fall 2025. Construction is expected to take 12 months and the facility would be open to the public in 2026.

## **2.5 EXISTING CONDITIONS**

The UDSP FEIR included a summary of existing on-site conditions. Since adoption of the FEIR, multiple projects have been completed within the UDSP planning area and several more are proposed or under construction. The CubeSmart project site was recently graded and does not support any vegetation. Stormwater runoff transmission and containment structures were recently constructed and there is a 35-foot-wide easement that traverses the project site associated with these stormwater improvements. The Hampton Inn parcels are fully developed with a hotel and associated parking.

## **2.6 FINDINGS AND CONCLUSIONS**

### **2.6.1 Section 15162 Findings**

Based on the project description contained in Section 2.4, each of the issues addressed in the UDSP FEIR, as well as each of the issues analyzed in Section 3.0 of this document, have been evaluated, leading to the following findings and conclusions:

- The proposed project does not result in any new significant effects or a substantial increase in the severity of significant effects previously identified in the UDSP FEIR.

- The proposed project would decrease the overall intensity of development for the CubeSmart project site compared to what could be developed under the UDSP Office/Commercial District designation (up to 6 stories/90 foot building height of mixed use or freeway commercial use). This represents a corresponding reduction in trip generation, vehicular air emissions, construction and operational noise, greenhouse gas emissions and demand for public services and utilities.
- Moving the Hampton Inn parcels from the HOCSP to the UDSP does not result in any new significant effects or a substantial increase in the severity of significant effects previously identified in the UDSP FEIR.
- The project applicant would continue to pay all applicable fees in effect at the time that future development is proposed, including Public Facilities Fees (PFF). PFF includes funding for circulation streets, SR-78 interchanges, National Pollutant Discharge Elimination System (NPDES) program, technology improvements, parks, and habitat conservation.
- The proposed project would not have effects that were not examined in the UDSP FEIR and feasible and still necessary mitigation measures developed in the UDSP FEIR are incorporated into this Addendum for the proposed project.

Thus, none of the conditions described in CEQA Guidelines Section 15162 calling for preparation of a subsequent EIR have occurred.

1. The change in the project analyzed in the FEIR for the UDSP is not substantial. Substantial changes in the project are those that would require “major revisions of the previous EIR ... due to the involvement of new significant environmental effects, or a substantial increase in the severity of previously identified significant effects.” As noted above, the proposed project will not result in new significant effects or a substantial increase in the severity of previously identified significant effects.
2. The circumstances under which the project is undertaken have not substantially changed. Substantial changes in the circumstances under which the project is being undertaken are defined as those that would “require major revisions of the previous EIR ... due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects”. The circumstances under which the project is being undertaken have changed, but those changes are not substantial changes that will result in the proposed project having new significant effects or a substantial increase in the severity of previously identified significant effects.
3. No new information of substantial importance, which was not known and could have not been known, with the exercise of reasonable diligence at the time the previous EIR was certified, shows:
  - “The project will have one or more significant effects not discussed in the previous EIR...;
  - Significant effects previously examined will be substantially more severe than shown in the previous EIR;
  - 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

- Mitigation measures or alternatives that are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.”

Section 15164 of the State CEQA Guidelines states that an Addendum to an EIR shall be prepared “if some changes or additions are necessary, but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.” Since none of the conditions of Section 15162 of the State CEQA Guidelines occur, an Addendum to the UDSP FEIR is the appropriate form of environmental documentation under CEQA for the proposed project.

### 3.0 INITIAL STUDY

#### 3.1 ENVIRONMENTAL CHECKLIST FORM

The following pages contain the Environmental Checklist Form (Form) for the proposed project. The Form is marked with findings as to the environmental effects of the project. As explained in Section 1.0, this analysis has been undertaken, pursuant to the provisions of CEQA, to provide the City of San Marcos with the factual basis for determining, based on the information available, the form of environmental documentation the project warrants. The basis for each of the findings is provided directly below each checklist item.

#### ENVIRONMENTAL CHECKLIST FORM

1. **Project Title:** University District Specific Plan Amendment  
(CubeSmart Self-Storage)
2. **Lead Agency Name and Address:** City of San Marcos  
1 Civic Center Drive  
San Marcos, CA 92069
3. **Contact Person:** Chris Garcia, Senior Planner  
(760) 744-1050 ext. 3237
4. **Project Location:** The proposed CubeSmart project is a 2.71-acre site located at 337 E. Carmel Street in the City of San Marcos. The project site is within the larger UDSP area, a 203-acre Specific Plan situated in the heart of San Marcos, with parcels located east and west of Twin Oaks Valley Road.
5. **Project Applicant:** Urban Villages San Marcos, LLC  
3525 Del Mar Heights Road #246  
San Diego, CA 92130
6. **Existing and Proposed General Plan Designations:** Existing: Specific Plan Area  
Proposed: Specific Plan Area
7. **Existing and Proposed Zoning:** Existing: Specific Plan Area  
Proposed: Specific Plan Area
8. **Project Description:** The proposed project is the approval of a General Plan Amendment, Specific Plan Amendments for the University District Specific Plan and the Heart of the City Specific Plan, a Zoning Ordinance text amendment and Conditional Use Permit to modify the boundaries of the UDSP and to construct a self-storage facility.
9. **Existing and Proposed Surrounding Land Use and Setting:** The UDSP area is located near existing residential and commercial uses and is adjacent

to CSUSM. The UDSP planning area is adjacent to the San Marcos Creek Specific Plan (Creek District) area which proposes a mix of residential, commercial and office uses. The CubeSmart project site was graded and drainage conveyance structures were built on the project site. The CubeSmart project site is bounded by E. Carmel on the north, light industrial and industrial on the east, the future Carmel Enterprise affordable housing project on the south, and the NCTD SPRINTER line and a parcel owned by NCTD on the west. The Hampton Inn parcels are developed with a hotel and associated parking and landscaping. The Hampton Inn site is bounded by E. Carmel on the north and west, the San Diego County Office of the Assessor-Recorder on the east, and the Block 1 area of the UDSP to the south.

**10. Public Agencies Whose Approval is Required (e.g., permits, financing approval, or participation agreement):**

City of San Marcos

## Determination

On the basis of this initial evaluation:

- The City finds that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
  - The City finds that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described on an attached sheet have been added to the project. A NEGATIVE DECLARATION will be prepared.
  - The City finds the proposed project may have a significant effect(s) 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. If the effect is a potentially significant impact or potentially significant unless mitigated an ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
  - The City finds that changes to the project or the circumstances under which the project would be undertaken require major revisions to the previous EIR in order to make the previous EIR adequately apply to the proposed project in accordance with Public Resources Code Section 21166 and CEQA Guidelines Section 15163. Thus, a SUBSEQUENT EIR shall be prepared.
  - The City finds that changes to the project or the circumstances under which the project would be undertaken require only minor revision to the previous EIR in order to make the previous EIR adequately apply to the proposed project in accordance with Public Resources Code Section 21166 and CEQA Guidelines Section 15163. Thus, a SUPPLEMENTAL EIR shall be prepared.
- X** The City finds that the significant effects that would result from the proposed project have been addressed in an earlier EIR, and that none of the determinations set forth in Public Resources Code Section 21166 and State CEQA Guidelines Section 15162 can be established. Thus, an ADDENDUM to the University District Specific Plan FEIR shall be prepared.

Chris Garcia, Senior Planner

Date

## 3.2 ENVIRONMENTAL ANALYSIS CHECKLIST

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### 1. AESTHETICS – Would the project:

#### a) Have a substantial adverse effect on a scenic vista?

**FEIR Conclusion: Less than Significant.** The FEIR (page 3.1-33) identified San Marcos Creek as the primary visual amenity within the UDSP site and that the project site did not support any primary or secondary ridgelines. The FEIR concluded that the UDSP project would not impact views of San Marcos Creek or impact views of primary or secondary ridgelines. Impacts to scenic vistas were considered less than significant and no mitigation measures were proposed.

The 2022 Amendment to the UDSP expanded the UDSP planning area to include the addition of two parcels located east of Industrial Street and the railroad tracks. One of these parcels, APN 220-201-90-00, is associated with the proposed CubeSmart project site and was analyzed assuming up to six stories and a 90-foot maximum building height. The analysis determined that impacts to scenic vistas would be less than significant (2022 FEIR Addendum page 21).

**Discussion of the Proposed Project:** The City's General Plan does not specifically define scenic vistas nor does it identify scenic vistas; however, the City has identified resources in the General Plan such as the San Marcos, Merriam, and Double Peak Mountains, creek corridors, mature trees, rock outcroppings, and ocean views.

#### **Ridgeline Protection and Management Overlay Zone**

The City adopted a Ridgeline Protection and Management Overlay Zone in November 2008, set forth in Ordinance 2008-1314, to preserve primary ridgelines in their natural state and minimize visual impacts to secondary ridgelines. These guiding principles are in place to protect natural viewsheds and unique natural resources, minimize physical impacts to ridgelines, and establish innovative site and architectural design standards.

The Ordinance identifies primary and secondary ridgelines within the City, plus buffer zones, or Ridgeline Overlay Zones (ROZ), surrounding these ridgelines. The Ordinance does not specifically call for the preservation of views to primary and secondary ridgelines, but rather establishes guidelines for development within primary and secondary ridgelines.

No primary or secondary ridgelines are located within or adjacent to the UDSP planning area or the CubeSmart project site. The nearest ridgeline is a secondary ridgeline located approximately 1.5 miles southwest of the CubeSmart project site near South Lake. The nearest primary ridgeline is located approximately 1.7 miles southwest of the project site. For development that is proposed within ridgeline overlay zones, special attention is given to any features that would disrupt the ridgeline silhouette. The CubeSmart project site is not located on or near any primary or secondary ridgelines.

#### **Lower Development Intensity**

Under the proposed project, the CubeSmart project site would be developed with 104,600 s.f. of storage space within a 3-story (37 feet high) building (Building A) and



6,600 s.f. of storage space within a 1-story building (12 feet high) (Building B) for a combined size of 111,200 s.f. The existing UDSP identifies the project site as having an Office/Commercial District designation, which would allow up to six stories (90 feet) of mixed use or freeway commercial use. Thus, the CubeSmart project represents a less intense development scenario for the site. The 2022 FEIR Addendum concluded that a 6-story/90-foot building would not result in an impact to a scenic vista. Therefore, a lower profile building (3 stories/37 feet) would have even less potential to have a substantial effect on a scenic vista. Therefore, the CubeSmart project would not result in any new significant impacts related to scenic vistas.

The project also proposes bringing the parcels associated with the existing Hampton Inn at 123 E. Carmel Street into the UDSP. The Hampton Inn parcels would be assigned a Mixed-Use Building A/Commercial Building use within the UDSP with a building height of 3 stories (30-foot minimum) to 5 stories (70-foot maximum). The proposed project does not propose any redevelopment of the existing 3-story Hampton Inn site as part of the requested actions so there would not be any visual change associated with this aspect of the project. Further, the height limit for these parcels would be similar to those for other properties along Carmel Street within the UDSP. Also, development of the Hampton Inn was analyzed in Negative Declaration #99-527, and any issues related to aesthetics would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

The previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

**Finding:** There are no significant impacts for this issue area and no changes in information that would require preparation of an EIR.

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

**FEIR Conclusion: Less than Significant.** The FEIR concluded that the portion of SR-78 adjacent to the project site is not identified as State scenic highway per the Caltrans State Scenic Highway Program and impacts would be less than significant (page 3.10-34).

The 2022 Amendment to the UDSP expanded the UDSP planning area to include the addition of two parcels located east of Industrial Street and the railroad tracks. One of these parcels, APN 220-201-90-00, is associated with the proposed CubeSmart project site and was analyzed assuming up to six stories and a 90-foot maximum building height. The analysis determined that impacts to scenic resources would be less than significant (2022 FEIR Addendum page 22).

**Discussion of the Proposed Project:** Development of the CubeSmart project would still occur within the footprint of the Specific Plan analyzed in the UDSP FEIR and 2022 FEIR Addendum.

According to Caltrans' California Scenic Highway Mapping System, the project site is not located adjacent to, or in the vicinity of, a designated state scenic highway (Caltrans 2011). SR-78 is a designated state scenic highway from the west boundary

of the Anza-Borrego Desert State Park to the east boundary of the State Park. The portion designated as a state scenic highway begins approximately 37 miles east of the project site. Additionally, the portion of SR-78 from the west boundary of the Anza-Borrego Desert State Park to the junction of SR-78 and SR-79 in Santa Ysabel is eligible for the state scenic highway designation (Caltrans 2011). The project site is located approximately 25 miles west of the closest point of this eligible state scenic highway. Therefore, the CubeSmart project does not have the potential to impact scenic resources within a state scenic highway including trees, rock outcroppings, or historic buildings, and no new impacts are identified. The previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

The project also proposes bringing the parcels associated with the existing Hampton Inn at 123 E. Carmel Street into the UDSP. The Hampton Inn parcels would be assigned a Mixed-Use Building A/Commercial Building use within the UDSP with a building height of 3 stories (30-foot minimum) to 5 stories (70-foot maximum). The proposed project does not propose any redevelopment of the existing 3-story Hampton Inn site as part of the requested actions so there would not be any visual change associated with this aspect of the project. The Hampton Inn would continue to operate as it currently does. Also, development of the Hampton Inn was analyzed in Negative Declaration #99-527, and any issues related to aesthetics would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed. Therefore, bringing in the Hampton Inn parcels does not have the potential to impact scenic resources within a state scenic highway including trees, rock outcroppings, or historic buildings, and no new impacts are identified.

The previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

***Finding:*** There are no significant impacts for this issue area and no changes in information that would require the preparation of an EIR.

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- c) **In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points). If the project is in an urbanized area, would the project conflict with the applicable zoning and other regulations governing scenic quality?**

***FEIR Conclusion: Less than Significant.*** The FEIR (page 3.1-34) concluded that the UDSP proposed urban development and new roadways that would alter the existing visual character of the project site. The FEIR also noted that the Specific Plan would introduce new visual amenities to the project site and surroundings. The FEIR concluded that implementation of the UDSP would result in a change in the visual character to the site and surrounding, although this change was not characterized as a degradation. Therefore, a less than significant impact was identified in the FEIR.

The 2022 Amendment to the UDSP expanded the UDSP planning area to include the addition of two parcels located east of Industrial Street and the railroad tracks. One of these parcels, APN 220-201-90-00, is associated with the proposed CubeSmart project site and was analyzed assuming up to six stories and a 90-foot maximum building height. The analysis determined that the 2022 Amendment would not result

in a significant degradation of the existing visual character or quality of public views of the site and its surroundings (2022 FEIR Addendum, page 29).

***Discussion of the Proposed Project:*** Development under the proposed CubeSmart project would still occur within the footprint of the Specific Plan analyzed in the 2022 FEIR Addendum. The City of San Marcos (which includes the project site) is considered an urbanized area per the Public Resources Code. Therefore, the first question of this aesthetics threshold does not apply to the proposed project, as it is directed at non-urbanized areas.

The second part of this threshold is for projects in urbanized areas, which is what applies to the project. A significant impact would occur if the project conflicts with the applicable zoning and other regulations that govern scenic quality. Scenic quality is a measure of the visual appeal of the landscape, which is subjective and varies.

The proposed CubeSmart project would construct a new self-storage facility at 337 E. Carmel Street to replace the existing CubeSmart facility that is currently located at 235 E. Carmel. Under the proposed project, the project site would be developed with 104,600 s.f. of storage space within a 3-story (37 feet high) building (Building A) and 6,600 s.f. of storage space within a 1-story building (12 feet high) (Building B) for a combined size of 111,200 s.f. The existing UDSP identifies the site has having an Office/Commercial District designation, which would allow up to six stories (90 feet) of mixed use or freeway commercial use. Thus, the proposed project represents a less intense development scenario for the project site.

A self-storage facility is not currently an allowable use within the Office/Commercial District of the UDSP, nor would a new self-storage facility be allowed at the proposed location per Section 20.400.180 (Self-Storage) of the San Marcos Municipal Code. Currently, Section 20.400.180 does not allow new self-storage within an SPA zone nor does it allow new self-storage within the SR-78 view corridor. As described in Section 2.4, the proposed project includes a Specific Plan Amendment to the UDSP (Appendix A1) to create a Self-Storage Overlay Zone within the UDSP. A Zoning Text Amendment (Appendix A3) is also proposed to allow self-storage within the newly created UDSP Self-Storage Overlay Zone. With approval of the Specific Plan Amendment and Zoning Text Amendment, the proposed CubeSmart project would be consistent with the applicable plans and policies, including those that regulate visual quality.

The new CubeSmart facility would serve as a replacement for the current CubeSmart facility at 235 E. Carmel, which is highly visible from SR-78, has multiple single-story storage buildings with metal roll up doors and minimal landscaping to shield views. The proposed CubeSmart project consolidates the storage into two buildings, with the 3-story building appearing more as a traditional office or commercial building, which better fits into the visual context of the SR-78 corridor. The proposed CubeSmart project incorporates setbacks and landscaping to further enhance the view from SR-78.

Further, the proposed project's consistency with policies related to scenic vistas was discussed in Section 1.a, above and was determined to have a less than significant impact. An analysis of the proposed project's consistency with other applicable General Plan policies is provided below.

### **Consistency with Applicable General Plan Policies**

#### ***Conservation and Open Space Element***

The Conservation and Open Space Element of the General Plan identifies a goal (Goal COS-3) to “protect natural topography and preserve and enhance the natural beauty of San Marcos.” Four policies are identified to support this goal.

Policy COS-3.1 related to preserving scenic resources, was discussed in Section 1.a. Policies COS-3.2 and 3-3 are discussed below and Policy COS-3-4 relates to lighting and is addressed in Section 1.d.

***Policy COS-3.2: Encourage and maintain high-quality architectural and landscaping designs that enhance or complement the hillsides, ridgelines, canyons, and view corridors that comprise the visual character in San Marcos.***

The UDSP serves as the guiding document for visual character and scenic quality within the project area. This is done through the Form-Based Code which is detailed in Section VI of the UDSP. The Form-Based Code provides standards related to blocks, street types, public parks and gathering spaces, building types, frontage requirements, architectural standards, landscaping standards and signage. Section VII of the UDSP addresses community identity, signage and public art. These regulations contribute to the overall visual character and scenic quality of the project site and ensure high-quality architectural and landscaping design. The CubeSmart project does not propose any development on hillside, ridgelines or canyons. Additionally, bringing the Hampton Inn parcels into the UDSP would not result in any development on hillsides, ridgelines or canyons. The proposed project would be consistent with Policy COS-3.2.

***Policy COS-3.3: Continue to work with new development and redevelopment project applicants in designing land use plans that respect the topography, landforms, view corridors, wildlife corridors, and open space that exists.***

The UDSP considers the existing topography and landforms both on the site and in the surrounding area as it relates to land use types, the height regulating plan and the building types. Overall, the UDSP planning area is located in a lower portion of the City, and the east side of the UDSP planning area is relatively flat. The CubeSmart site was previously graded for the installation of drainage infrastructure. The Hampton Inn parcels are already fully developed with a hotel and associated parking and no redevelopment is proposed. The UDSP is located in a developed portion of the City and does not support any wildlife corridors or open space. The proposed project would be consistent with Policy COS-3.3.

### ***Land Use Element***

The Land Use Element of the General Plan identifies a goal (Goal LU-5) to “Promote community design that produces a distinctive, high-quality built environment with forms and character that create memorable places and enrich community life.” Several policies support this goal with two of them specifically relating to visual character and quality (Policy LU-5.4 and LU-5.6). These policies are analyzed below.

***Policy LU-5.4: Require building and site design that respects the natural topography and iconic ridgelines that serve as the visual backdrop for San Marcos.***

Section 1.a discusses the proposed project in light of the area's ridgelines and the City's ROZ. No development is proposed on primary or secondary ridgelines and the analysis in Section 1.a determined that the proposed project would not result in a significant change to scenic vistas in the City. The proposed CubeSmart project would actually construct a 3-story building in an area that has a maximum 6-story/90 foot height limit. Visually, the CubeSmart project would sit below the proposed multi-family residential project immediately to the south. The Hampton Inn parcels are already fully developed with a hotel and associated parking. The proposed project would be consistent with Policy LU-5.4.

***Policy LU-5.6:*** *Require a specific plan for strategic areas/properties that require high-quality design, orientation and development due to their location or visibility within the community.*

The project site is visible from SR-78. The UDSP serves as the guiding document for visual character and scenic quality within the project area. This is done through the Form-Based Code which is detailed in Section VI of the UDSP. The Form-Based Code provides standards related to blocks, street types, public parks and gathering spaces, building types, frontage requirements, architectural standards, landscaping standards and signage. Section VII of the UDSP addresses community identity, signage and public art. These regulations ensure that future development within the UDSP planning area will be of a high-quality design.

The proposed CubeSmart project has been designed in a manner to break up the bulk and scale of the building. Setback and landscaping will also enhance the visual appearance of the proposed project. The appearance of the proposed 3-story building would be designed similar to a commercial/office building and would blend into the built environment along the SR-78 corridor in the project vicinity. The Hampton Inn parcels are already fully developed with a 3-story hotel and associated parking. No changes in design or architecture are proposed for the Hampton Inn site. The project would be consistent with Policy LU-5.6.

An additional policy, LU-6.9, addresses aesthetics and design related to the SR-78 corridor:

***Policy LU-6.9:*** *Ensure high quality architectural standards and aesthetic design quality particularly for redevelopment along the State Route 78 corridor and within the commercial core of the community.*

The CubeSmart site and the Hampton Inn parcels are visible from SR-78. The CubeSmart project would develop a 104,600 s.f. of storage space within a 3-story (37 feet high) building (Building A) and 6,600 s.f. of storage space within a 1-story building (12 feet high) (Building B) for a combined size of 111,200 s.f. An office is proposed in the northeast corner of Building A. The CubeSmart project site visibility from SR-78 has been considered in the project design. Rooftop metal screening would visually shield the proposed rooftop mechanical ventilation units (HVAC). Proposed building materials include concrete masonry units with a paint finish, metal accents and metal roll up doors which will break up the bulk and scale of the building. Renderings of the building design are included as Figures 4a and 4b. The proposed 3-story building is well below the allowable building height of 6-stories/90 feet contemplated for the site in the UDSP Height Regulating Plan.

The Hampton Inn parcels are already developed with a 3-story hotel and associated parking and no change in development of that site is proposed.

In conclusion, the project is consistent with the applicable General Plan policies related to visual character and quality.

### **Visual Character and Quality**

This section discusses the visual character and quality of the project site and surrounding areas and discusses the change with implementation of the proposed project.

The visual character of the project site and vicinity is influenced by the urbanized and developed nature of the project vicinity. Topographically, the UDSP planning area sits within lower portions of the City and primary and secondary ridgelines provide a visual backdrop to this urbanized area. Motorists, cyclists and pedestrians pass near the project site on E. Carmel Street and on SR-78.

The UDSP serves as the guiding document for visual character and quality within the project area. This is done through the Form-Based Code which contains three Regulating Plans. These are the Street Type Regulating Plan, the Building and Public Space Regulating Plan, and the Height Regulating Plan. These regulations provide an urban design and regulatory framework to ensure the vision for the planning area is implemented. The UDSP's stated vision is to create a sustainable and vibrant urban center that strengthens the emerging downtown core of San Marcos.

**Figures 5a, 5b, 6a, 6b, 7a and 7b** present “existing” views and “with project” views from three locations: eastbound SR-78, westbound SR-78 and from the Valpreda Road/Rancheros Drive intersection. Each of these views is discussed in more detail below.

**SR-78 Eastbound** (Figures 5a and 5b) – These figures depict the view from eastbound SR-78 just after the SPRINTER overcrossing. This is an urbanized location in the City and views to ridgelines are limited.

Figure 5a represents the existing view of the CubeSmart project site from motorists on eastbound SR-78. E. Carmel Avenue, which is a frontage road to SR-78 is visible in the foreground. The CubeSmart project site was recently graded and stormwater runoff transmission and containment structures were constructed. Existing light industrial buildings are visible to the east and south of the CubeSmart project site.

Figure 5b represents the view with buildout of the project area and the proposed 5-story Carmel Enterprise affordable housing development immediately to the south of the self-storage facility. The proposed self-storage facility (three stories) sits visually below the future multi-family residential. Proposed landscaping, including trees, will provide some visual screening from SR-78. The 2022 FEIR Addendum (page 16) concluded that impacts to scenic vistas would be less than significant when a 6 story/90-foot building was considered on the project site. Since the CubeSmart project proposes a lower building (three stories/37 feet), there would not be a significant change in visual character or quality from this view point with implementation of the proposed project.

**SR-78 Westbound** – (Figures 6a and 6b) – These figures depict the view from westbound SR-78 just before the SPRINTER overcrossing. This is an urbanized location in the City.

Figure 6a represents the existing view of the CubeSmart project site from motorists on westbound SR-78. The CubeSmart project site was recently graded and stormwater runoff transmission and containment structures were constructed. The Mesa Rim Climbing gym is visible, as are ridgelines to the southwest.

Figure 6b represents the view with buildout of the project area and the proposed 5-story Carmel Enterprise affordable housing development immediately to the south of the self-storage facility. The proposed self-storage facility (three stories) sits visually below the future multi-family residential. Proposed landscaping, including trees, will provide some visual screening from SR-78. Some of the ridgelines are still visible. The 2022 FEIR Addendum (page 16) concluded that impacts to scenic vistas would be less than significant when a 6-story/90-foot building was considered on the CubeSmart project site. Since the project proposes a lower building (three stories/37 feet), there would not be a significant change in visual character or quality from this view point with implementation of the proposed project.

**Valpreda Road/Rancheros Drive Intersection** – (Figures 7a and 7b) – These figures depict the view from Valpreda Road at Rancheros Drive. This location is opposite the CubeSmart project site, north of SR-78.

Figure 7a represents the existing view at Valpreda Road at Rancheros Drive towards the project site. Vehicles traveling on SR-78 dominate the foreground and views of the project site are generally obscured. Some light industrial buildings are visible in the project site vicinity. Ridgelines to the south of the CubeSmart project site are visible.

Figure 7b represents the view with buildout of the project area and the proposed 5-story Carmel Enterprise affordable housing development immediately to the south of the self-storage facility. The proposed self-storage facility (three stories) sits visually below the future multi-family residential. Vehicles traveling on Rancheros Drive and SR-78 will still continue to dominate this view. Some of the ridgelines south of the CubeSmart project site are still visible. The 2022 FEIR Addendum (page 16) concluded that impacts to scenic vistas would be less than significant when a 6-story/90-foot building was considered on the project site. Since the project proposes a lower building (three stories/37 feet), there would not be a significant change in visual character or quality from this view point with implementation of the proposed project.

The Hampton Inn parcels are already developed with a 3-story hotel and associated parking. The proposed project does not propose any redevelopment of the Hampton Inn site as part of the requested actions so there would not be any change related to visual character or visual quality with this aspect of the project. Further, development of the Hampton Inn was analyzed in Negative Declaration #99-527, and any issues related to aesthetics would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

In summary, the proposed project will not result in any new significant impacts related to visual character or visual quality and the conclusions in the FEIR and 2022 FEIR Addendum are still applicable for the proposed project.

***Finding:*** There are no significant impacts for this issue area and no changes in information that would require preparation of an EIR.

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d) **Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?**

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***FEIR Conclusion: Less than Significant.*** The FEIR (page 3.1-35) concluded that the UDSP project would adhere to the standards set by the City to use downward-directed low-pressure sodium vapor lighting for outdoor lighting to preserve dark-sky conditions. The FEIR analysis concluded that impacts due to substantial light or glare would be considered less than significant.

The 2022 Amendment to the UDSP expanded the UDSP planning area to include the addition of two parcels located east of Industrial Street and the railroad tracks. One of these parcels, APN 220-201-90-00, is associated with the proposed CubeSmart project site. The analysis concluded that the changes associated with the 2022 Amendment would not result in any new lighting or glare impacts (2022 FEIR Addendum page 31).

***Discussion of the Proposed Project:*** The UDSP area is within an urbanized portion of the City and is adjacent to areas that are already incorporating nighttime lighting and street lights. The project site is along a developed corridor along E. Carmel Street and near SR-78.

The proposed CubeSmart project would incorporate lighting for safety and security and would be required to adhere to the lighting requirements identified in the UDSP (Chapter 6, Form-Based Code). Per the requirements:

“Proposed street, sidewalk, path and trail lighting shall provide safe levels per City of San Marcos standards and shall be configured so as not to create a new source of substantial sky-glow, light trespass or glare that would adversely affect nighttime views in San Marcos Creek and its environs. In addition to City ordinances, lighting and luminaries shall comply with all State of California and County light pollution and energy consumption regulations and standards. Safe levels of lighting shall be provided using energy efficient lamp technologies such as metal halide, induction lamps, high pressure sodium, LED, or other light sources as approved by the City of San Marcos, along with luminaries designed with shades and cut-offs to eliminate off-site lighting and nighttime sky pollution. Lighting should be directed from edges of view corridors onto paving surfaces, rather than placing fixtures or visible sources of light in the view.”

All future development within the UDSP, including the proposed CubeSmart project, will continue to be required to adhere to the lighting requirements in the UDSP which requires that lighting be configured so as not to create a new source of substantial sky-glow, light trespass or glare that would adversely affect nighttime views.

The CubeSmart project incorporates a variety of materials, including metal panels. Glare control for metal panels has been specified on the architectural plans.

The Hampton Inn parcels are already developed with a 3-story hotel and associated parking. The proposed project does not propose any redevelopment of the Hampton Inn site as part of the requested actions so there would not be any change related to visual character or visual quality with this aspect of the project. Further, development of the Hampton Inn was analyzed in Negative Declaration #99-527, and any issues related to aesthetics would have been analyzed and mitigated under



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that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, no new impacts are identified for this issue area. The previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project

***Finding:*** There are no significant impacts for this issue area and no changes in information that would require preparation of an EIR.

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

***FEIR Conclusion: No Impact.*** The Initial Study prepared for the 2009 FEIR determined that the project would not impact agricultural resources. According to the California Department of Conservation’s San Diego County Important Farmland Map 2006, portions of the UDSP site were identified as Grazing Land and Farmland of Local Importance. The remaining part of the UDSP area was either unmapped or identified as urban/built-up land. While historically the UDSP site supported agriculture, there were no existing agricultural operations in 2009. Additionally, while the site contains areas mapped as Farmland of Local Importance and Grazing Land, impacts to these lands were determined to be less than significant, as the viability and feasibility of new or ongoing grazing or agricultural operations at that location are unlikely due to the existing development in the area, including residential uses (FEIR page 5-1).

The 2022 Amendment to the UDSP expanded the UDSP planning area to include the addition of two parcels located east of Industrial Street and the railroad tracks. One of these parcels, APN 220-201-90-00, is associated with the proposed CubeSmart project site. Per the 2022 FEIR Addendum, the additional parcels were not identified as containing prime farmland, unique farmland or farmland of statewide importance (2022 FEIR Addendum page 31).

***Discussion of the Proposed Project:*** Development under the proposed CubeSmart project would occur within the footprint analyzed in the 2022 FEIR Addendum. The CubeSmart project site is not identified as containing prime farmland, unique farmland, or farmland of statewide importance. Additionally, the CubeSmart project site has been recently graded and stormwater runoff transmission and containment structures were constructed.

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The Hampton Inn parcels are fully developed, and no redevelopment of the Hampton Inn site is proposed. The site does not support any farmland mapped per the Farmland Mapping and Monitoring program of the California Resources Agency. Additionally, development of the Hampton Inn was analyzed in Negative Declaration #99-527. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, no new impacts are identified for this issue area. The previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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**b) Conflict with existing zoning for agricultural use or a Williamson Act contract?**

**FEIR Conclusion: No Impact.** The FEIR prepared for the UDSP concluded that implementation of the Specific Plan would not have any impacts related to Williamson Act Contracts, since no contracts were associated with the UDSP planning area (FEIR page 5-1). Additionally, the parcels analyzed in the 2022 FEIR Addendum, which include the proposed CubeSmart project site, also were not zoned for agricultural use (2022 FEIR Addendum page 32).

**Discussion of the Proposed Project:** Development of the proposed CubeSmart project would occur within the footprint analyzed in the 2022 FEIR Addendum. The CubeSmart site is zoned as Specific Plan Area and is associated with the UDSP. Therefore, no new impacts are identified for this issue area and the previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

The Hampton Inn parcels are fully developed and are zoned Commercial within the HOCSP. Additionally, development of the Hampton Inn was analyzed in Negative Declaration #99-527. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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**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 51140(g))?**

**FEIR Conclusion: No Impact.** The FEIR (page 5-1) determined that there is no forest land or timberland located within the UDSP planning area. Additionally, the parcels analyzed in the 2022 FEIR Addendum, which include the proposed CubeSmart project site, also were not zoned for or near lands zoned for forest land or timberland (2022 FEIR Addendum page 32).

**Discussion of the Proposed Project:** Development of the CubeSmart project would occur within the footprint analyzed in the 2022 FEIR Addendum. The CubeSmart site is zoned as Specific Plan Area and is associated with the UDSP. Therefore, no new impacts are identified for this issue area and the previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

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The Hampton Inn parcels are fully developed and are zoned Commercial within the HOCSP. Additionally, development of the Hampton Inn was analyzed in Negative Declaration #99-527. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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

**FEIR Conclusion: No Impact.** The FEIR (page 5-1) determined that there is no forestland within the UDSP planning area. Additionally, the parcels analyzed in the 2022 FEIR Addendum, which include the proposed CubeSmart project site, also did not support any forest land nor are they located adjacent to forest land (2022 FEIR Addendum page 33).

**Discussion of the Proposed Project:** Development of the CubeSmart project would occur within the footprint analyzed in the 2022 FEIR Addendum. The CubeSmart site does not support any forest land nor is it adjacent to forest land. Therefore, no new impacts are identified for this issue area and the previous FEIR conclusions are still applicable for the proposed project.

The Hampton Inn parcels are fully developed and do not support any forest resources. Additionally, development of the Hampton Inn was analyzed in Negative Declaration #99-527. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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**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?**

**FEIR Conclusion: Partially Analyzed/No Impact.** The FEIR (page 5-1) determined that there are no forest lands or farmlands on the UDSP site. Additionally, the parcels analyzed in the 2022 FEIR Addendum, which include the proposed CubeSmart project site, also are not zoned for nor do they contain forest or farmland (2022 FEIR Addendum page 33).

**Discussion of the Proposed Project:** Development of the CubeSmart project would occur within the footprint analyzed in the 2022 FEIR Addendum. The CubeSmart site is currently zoned Specific Plan Area and is associated with the UDSP. Therefore, no new impacts related to the conversion of farmland or forest land are identified for this issue area and the previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

The Hampton Inn parcels are fully developed and are zoned Commercial within the HOCSP. Bringing the Hampton Inn parcels in the UDSP would not result in any changes that would result in the conversion of Farmland to non-agricultural use, or the conversion of forest land to non-forest use. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

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**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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3. **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?**

**FEIR Conclusion: Less than Significant.** The FEIR (page 3.2-19) concluded that the emissions budget for the UDSP project would be consistent with the established San Diego Air Pollution Control District (SDAPCD) Regional Air Quality Strategies (RAQS). The location of the UDSP would reduce vehicular trips, encourage use of the SPRINTER train and alternative transportation. The FEIR concluded that impacts were less than significant for this issue area.

The 2022 Amendment to the UDSP expanded the UDSP planning area to include the addition of two parcels located east of Industrial Street and the railroad tracks. One of these parcels, APN 220-201-90-00, is associated with the proposed CubeSmart project site. Per the 2022 FEIR Addendum, the 2022 Amendment resulted in an overall reduction in development intensity and no conflict with or obstruction of implementation of the RAQS would occur (2022 FEIR Addendum page 34).

**Discussion of the Proposed Project:** The CubeSmart project is related to the RAQS and/or the State Implementation Plan (SIP) through the land use and growth assumptions that are incorporated into the air quality planning process. The current air quality planning process would have considered the existing UDSP. The proposed project would decrease the overall intensity of development for the project site compared to what could be developed under the Office/Commercial District designation (up to six stories of mixed use or freeway commercial use) and what was analyzed in the UDSP FEIR and Addenda. This results in a reduced amount of air emissions. Therefore, the proposed CubeSmart project would not conflict with or obstruct implementation of the applicable air quality plan.

The proposed changes to the UDSP boundary to add the Hampton Inn parcels would not result in any additional air quality impacts. The Hampton Inn site is already developed and would have been considered in the RAQS and SIP planning process. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

The previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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b) **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?**

**FEIR Conclusion: Significant and Unmitigated:** The FEIR cumulative air quality analysis (page 3.2-20) concluded that when carbon monoxide (CO), nitrous oxides

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(NOx) and reactive organic gas (ROG) emissions from operation of the UDSP are considered with the future emissions of the cumulative projects, a significant cumulative impact would occur. The FEIR included design features and mitigation measures (AQ-1 through AQ-4) to reduce some of the project emissions; however, it was determined that impacts would not be reduced to below a level of significance.

Per the 2022 FEIR Addendum (page 34), the 2022 Amendment resulted in an overall reduction in development intensity. Based on the air quality analysis prepared for the 2022 FEIR Addendum, construction and operational emissions would be lower for all analyzed criteria pollutants (ROG, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>) compared to the emissions anticipated under the previously approved UDSP (2022 FEIR Addendum page 34).

**Discussion of the Proposed Project:** The proposed CubeSmart project would decrease the overall intensity of development for the CubeSmart project site compared to what could be developed under the Office/Commercial District designation (up to six stories of mixed use or freeway commercial) and what was analyzed in the UDSP FEIR and Addenda. Therefore, air emissions generated by the project would be less than what was analyzed in the FEIR and 2022 FEIR Addendum.

The proposed changes to the UDSP boundary to add the Hampton Inn parcels would not result in any air quality impacts. The Hampton Inn site is already developed and no redevelopment or change in operations at the Hampton Inn site is proposed. Therefore, no change in air quality emissions would occur. The UDSP FEIR considered a larger scope of development within the UDSP, and the development yield of the UDSP has decreased over time with various specific plan amendments. The addition of the Hampton Inn hotel rooms to the overall UDSP development yield would still be below the original development assumptions of the UDSP. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, the conclusions in the FEIR and 2022 FEIR Addendum are still applicable to the proposed project, and no new impacts beyond those identified in the FEIR are identified. Applicable air quality mitigation measures would still apply to development under the proposed project and proposed construction activities would comply with current SDAPCD requirements related to construction equipment emissions and control of fugitive dust generation.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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c) **Expose sensitive receptors to substantial pollutant concentrations?**

**FEIR Conclusion: Less than Significant.** The FEIR (page 3.2-15-16) concluded that onsite construction equipment would not exceed health risk screening levels for toxic air contaminants, and therefore, construction related emissions would have a less than significant effect on sensitive receptors.

Per the 2022 FEIR Addendum (page 36), the 2022 Amendment resulted in an overall reduction in development intensity. Based on the air quality analysis prepared for the 2022 FEIR Addendum, construction and operational emissions would be lower for all analyzed criteria pollutants (ROG, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>) compared to the

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emissions anticipated under the previously approved UDSP and would therefore not significantly impact sensitive receptors (2022 FEIR Addendum page 36).

**Discussion of the Proposed Project:** The proposed CubeSmart project would decrease the overall intensity of development for the CubeSmart site compared to what could be developed under the Office/Commercial District designation (up to six stories of mixed use or freeway commercial) and what was analyzed in the UDSP FEIR and Addenda. Therefore, construction and operational air emissions generated by the CubeSmart project would be less than what was analyzed in the FEIR and 2022 FEIR Addendum. The proposed changes to the UDSP boundary to add the Hampton Inn parcels would not result in any air quality impacts. The Hampton Inn site is already developed and no redevelopment or change in operations at the Hampton Inn site is proposed. Therefore, no change in air quality emissions would occur. The UDSP FEIR considered a larger scope of development within the UDSP, and the development yield of the UDSP has decreased over time with various specific plan amendments. The addition of the Hampton Inn hotel rooms to the overall UDSP development yield would still be below the original development assumptions of the UDSP. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Air quality mitigation measures, as applicable, would still apply to development under the proposed project and proposed construction activities would comply with current SDAPCD requirements related to construction equipment emissions and control of fugitive dust generation. Therefore, no new impacts related to exposing sensitive receptors to substantial pollutant concentrations are identified for this issue area and the previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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**d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?**

**FEIR Conclusion: Less than Significant.** The FEIR (page 3.2-18) and 2022 FEIR Addendum (page 36) concluded that since any generation of odors related to construction would be short-term and intermittent in nature, less than significant impacts related to odor would occur. Also, the FEIR (page 3.2-18) and 2022 FEIR Addendum (page 36) concluded that the combination of mixed use residential, student housing, general and medical office, hotel and mixed-use commercial/retail uses are not typically characterized as uses that would generate odors, compared to uses such as industrial and manufacturing. Therefore, odor related impacts from future uses on the project site were determined to be less than significant.

**Discussion of the Proposed Project:** Development under the proposed CubeSmart project includes self-storage facilities which is not a use typically characterized as one that would generate odors. Additionally, any construction equipment would adhere to current SDAPCD requirements. The proposed changes to the UDSP boundary to add the Hampton Inn parcels would not result in any odor-related emissions. The Hampton Inn site is already developed and would continue to operate as a hotel. Hotel uses would not typically be characterized as a use which would

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generate nuisance air emissions (e.g., odors). Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, no new impacts related to objectionable odors would occur and the FEIR and 2022 FEIR Addendum conclusions are still applicable to the proposed project.

***Finding:*** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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#### 4. 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 Wildlife or U.S. Fish and Wildlife Service?**

***FEIR Conclusion: Mitigated to Below a Level of Significance.*** The FEIR (page 3.3-18) concluded several sensitive avian and reptilian species have been identified within the UDSP project area including Cooper’s hawk, rufous-crowned sparrow, and orange throated whiptail. These species typically nest and forage in the upland habitats (i.e., coastal sage scrub and emergent wetland) found onsite. Upland habitat occurs within the overall UDSP project area; therefore, potential direct impacts to these species could occur during construction activities. Activities such as clearing, grubbing and grading would impact habitat where these species could live and/or forage. Mitigation identified in the FEIR would still be applicable for future development under the UDSP and when implemented, would reduce the potential direct impact to these species to below a level of significance. The mitigation includes a mix of habitat mitigation and pre-construction surveys.

Additionally, the FEIR noted that four least Bell’s vireo have been identified outside of the UDSP area within the San Marcos Creek corridor, but within 500 feet of the UDSP area. Mitigation identified in the FEIR would still be applicable to future development within the UDSP and would reduce the impact to below a level of significance.

Two sensitive plant species, southwestern spiny rush and smooth tarplant, were identified within the UDSP area in the FEIR (page 3.3-18). The spiny rush would be preserved within biological open space. The small population (166 individuals) of smooth tarplant was found in disturbed non-native grasslands vegetation in the eastern portion of the UDSP site. Although the smooth tarplant is a California Native Plant Society (CNPS), List 1B.1 species, it is not covered by the Multiple Habitat Conservation Plan (MHCP). The City does not recognize CNPS status as a determination of sensitivity. Therefore, the FEIR did not identify any impacts related to these two plant species.

The 2022 Amendment to the UDSP expanded the UDSP planning area to include the addition of two parcels located east of Industrial Street and the railroad tracks. One of these parcels, APN 220-201-90-00, is associated with the proposed CubeSmart project site. Per the 2022 FEIR Addendum, the additional parcels were not identified as containing any sensitive species (2022 FEIR Addendum page 37).

***Discussion of the Proposed Project:*** Development under the proposed CubeSmart project would occur within the footprint analyzed in the 2022 FEIR Addendum. The

proposed CubeSmart project site has been recently graded and stormwater runoff transmission and containment structures were constructed. The site does not contain any sensitive species. Therefore, there would be no new potential for impacts to candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or United States Fish and Wild Life Service (USFWS).

Mitigation measures identified in the FEIR (MM BIO 1A through 1E and BIO-1 through 20) would be required to be implemented, as applicable, for all future development. MM-BIO-20 requires that prior to issuance of grading permits within the project area, the City shall confirm that current biological surveys have been conducted for the area proposed to be graded and any additional consultation and permits required from the wildlife agencies have been obtained. Biological surveys shall be deemed as current if they are less than one year old.

The proposed CubeSmart project would not result in any new impacts related to sensitive species or increase the severity of impacts to sensitive species. The Hampton Inn parcels are fully developed, and no redevelopment is proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any biological resources impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, no new impacts are identified for this issue area and the previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

***Finding:*** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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**b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

***FEIR Conclusion: Mitigated to Below a Level of Significance.*** The FEIR (page 3.3-26) stated that the UDSP project proposes preservation of habitat, revegetation efforts, and compliance with appropriate permit conditions as determined by the CEQA process, CDFW, United States Army Corp of Engineers (USACE), Regional Water Quality Board (RWQCB), and USFWS. Additionally, the project would mitigate impacts in a manner that is consistent with the goals of the MHCP.

Additionally, the parcels analyzed in the 2022 FEIR Addendum, which include the proposed CubeSmart project site, also do not support any riparian habitat or other sensitive natural communities (2022 FEIR Addendum page 38).

***Discussion of the Proposed Project:*** Development under the proposed CubeSmart project would occur within the footprint analyzed in the 2022 FEIR Addendum. The CubeSmart project site was recently graded, and stormwater runoff transmission and containment structures were constructed. The CubeSmart site does not support any riparian habitat or other sensitive habitat or other sensitive natural communities. There would be no new potential for substantial adverse effects on any riparian habitat or other sensitive natural communities identified in local or regional plans, policies, or regulations, or by the CDFW or USFWS. The Hampton Inn parcels are fully developed, and no redevelopment of the Hampton Inn site is proposed. Development



of the Hampton Inn was analyzed in Negative Declaration #99-527 and any biological resources impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, no new impacts are identified for this issue area. The previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

***Finding:*** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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- 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?**

***FEIR Conclusion: Mitigated to Below a Level of Significance.*** The FEIR (page 3.3-35) identified impacts to jurisdictional wetlands and waters, including permanent impacts to 3.06 acres and temporary impact to 2.06 acres of USACE Jurisdictional wetlands. Mitigation at a 3:1 and 2:1 ratio was identified in the FEIR for these losses and represents a total of 14.92 acres of mitigation. The FEIR also concluded that permanent impacts to 0.03 acre and temporary impacts to 0.32 acre of Jurisdictional Waters of the U.S. would be mitigated at a 1.5:1 and 1:1 ratio, respectively, for a total of 0.371 acres. Permanent impacts to 4.07 acres and temporary impacts to 2.06 acres of State Jurisdictional Wetlands would be mitigated at a 3:1 and 2:1 ratio, respectively, for a total of 16.33 acres. Additionally, before impacting those areas, the project would require a USACE Section 404 permit and RWQCB Section 401 Water Quality Certification for impacts to USACE jurisdictional wetlands and waters. For impacts to CDFW jurisdictional areas, a Section 1600 Series Streambed Alteration Agreement would be required. Impacts were mitigated to below a level of significance.

Additionally, the parcels analyzed in the 2022 FEIR Addendum, which include the proposed CubeSmart project site, also do not support any federally protected wetlands (2022 FEIR Addendum page 38).

***Discussion of the Proposed Project:*** Development under the proposed CubeSmart project would occur within the footprint analyzed in the 2022 FEIR Addendum. The CubeSmart project site was recently graded, and stormwater runoff transmission and containment structures were constructed. The CubeSmart site does not support any federally protected wetlands. There would be no new potential for the project to 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. Therefore, no new impacts are identified for this issue area. The Hampton Inn parcels are fully developed, and no redevelopment is proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any biological resources impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

The previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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- 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?**

**FEIR Conclusion: Mitigated to Below a Level of Significance.** The FEIR (page 3.3-20) concluded that the UDSP project site supports a local corridor within the northwestern portion of the project boundary. This corridor consists primarily of San Marcos Creek and associated riparian habitat. The UDSP was designed to minimize impacts to the San Marcos Creek channel; however, installation of the Grand Avenue bridge and development slopes associated with the project could result in temporary and permanent impacts to the creek which serves as a wildlife corridor. Noise, equipment and human intrusion associated with the construction of the bridge could temporarily disrupt the movements of wildlife that uses the corridor; however, impacts were determined to be less than significant. Biological resources mitigation measures were included in the FEIR and were determined to reduce impacts to below a level of significance.

Additionally, the parcels analyzed in the 2022 FEIR Addendum, which include the proposed CubeSmart project site, are not identified as wildlife corridors or linkages (2022 FEIR Addendum page 39).

**Discussion of the Proposed Project:** Development under the proposed CubeSmart project would occur within the footprint analyzed in the 2022 FEIR Addendum. The CubeSmart project site was recently graded, and stormwater runoff transmission and containment structures were constructed. The CubeSmart site does not support any wildlife corridors or linkages and is not adjacent to any habitat areas. There would be no new potential for the project to interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, nor impede the use of native wildlife nursery sites. The Hampton Inn parcels are fully developed, and no redevelopment is proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any biological resources impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, no new impacts are identified for this issue area. The previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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

**FEIR Conclusion: No Impact.** The FEIR (page 3.3-25) identified that the City did not currently have any tree preservation policies, and no impact was identified for this issue area.

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Per the 2022 FEIR Addendum, since certification of the FEIR, the City's General Plan was updated and includes a policy related to tree replacement. General Plan Policy COS-2.6 requires that any removed trees be replaced at a 1:1 ratio. Future development within the UDSP area would be required to adhere to the City's tree replacement policy (2022 FEIR Addendum page 40).

**Discussion of the Proposed Project:** Development under the proposed CubeSmart project would occur within the footprint analyzed in the 2022 FEIR Addendum. The CubeSmart project site was recently graded, and stormwater runoff transmission and containment structures were constructed. The CubeSmart site does not contain any trees that would be subject to the City's tree replacement policy; however, the project would install 30 new trees as part of the landscape plan. There would be no new potential for the project to conflict with any local policies or ordinances protecting biological resources. The Hampton Inn parcels are fully developed, and no redevelopment is proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any biological resources impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, no new impacts are identified for this issue area. The previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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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?**

**FEIR Conclusion: Less than Significant.** The FEIR (page 3.3-25) identified that the UDSP project area is located within the City's Subarea Plan (not yet adopted) and is part of the adopted MHCP. The FEIR concluded that mitigation proposed for impacts to sensitive habitat and sensitive species is consistent with the recommendation of the MHCP. The FEIR did not identify any impacts for this issue area.

Additionally, the parcels analyzed in the 2022 FEIR Addendum, which include the proposed CubeSmart project site, do not support any sensitive habitat or species, or federally protected wetlands (2022 FEIR Addendum page 40).

**Discussion of the Proposed Project:** The City's Subarea Plan has not been adopted. Development under the proposed CubeSmart project would occur within the footprint analyzed in the 2022 FEIR Addendum. The CubeSmart project site does not support any sensitive habitat or species, or federally protected wetlands. There would be no new potential for the project to conflict with the provisions of a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. The Hampton Inn parcels are fully developed, and no redevelopment is proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any biological resources impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, no new impacts are identified for this issue area. The previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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**5. CULTURAL RESOURCES – Would the project:**

**a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?**

**FEIR Conclusion: Less Than Significant.** The FEIR concluded that there were two historical resources located within the planning area (page 3.4-4): 1) ASM 12760 A&B consists of concrete foundation pads for a post-1945 chicken coop, as well as a concrete drain; and 2) ASM 127760 C consists of concrete foundation pads for a post-1945 chicken coop. The FEIR (page 3.4-9) concluded that these structures were not eligible for listing on the California Register of Historical Resources and concluded that impacts to historical resources would be less than significant.

The 2022 Amendment to the UDSP expanded the UDSP planning area to include the addition of two parcels located east of Industrial Street and the railroad tracks. One of these parcels, APN 220-201-90-00, is associated with the proposed CubeSmart project site. Per the 2022 FEIR Addendum (page 41), the additional parcels were not identified as containing any historical resources.

**Discussion of the Proposed Project:** Development under the proposed CubeSmart project would occur within the footprint analyzed in the 2022 FEIR Addendum. The CubeSmart project site does not contain any historical resources. There would be no new potential for the CubeSmart project to have a substantial adverse change in the significance of a historical resource. The Hampton Inn parcels are fully developed, and no redevelopment is proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any historical resources impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, no new impacts are identified for this issue area and the previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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**b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?**

**FEIR Conclusion: Mitigated to Below a Level of Significance.** The FEIR (page 3.4-9) identified the following previously identified archaeological resources within the UDSP planning area: 1) SDI-17896, a single bedrock outcrop with three grinding slicks; 2) SDI-17897, a single bedrock grinding slick; and 3) SDI-17898, consisting of a concrete pad with floor tiles, remains of a chimney-like structure, and historic/modern debris. Native American consultation noted that subsurface cultural deposits may exist on the project site and the potential for a significant impact.

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Mitigation measures were identified in the FEIR to reduce the impact to below a level of significance (MM CR-1 through CR-5). The 2022 FEIR Addendum concluded that the project would not result in any increase in potential for impact to tribal cultural resources.

Additionally, the parcels analyzed in the 2022 FEIR Addendum, which include the proposed CubeSmart project site, were not identified as supporting any archaeological resources (2022 FEIR Addendum page 41).

**Discussion of the Proposed Project:** Development under the proposed CubeSmart project would occur within the footprint analyzed in the 2022 FEIR Addendum. The proposed CubeSmart project site does not support any known archaeological resources. Future development within the UDSP planning area is required to adhere to mitigation measures CR-1 through CR-4, which address archaeological monitoring requirements during grading. Additionally, any development that results in grading is subject to the City's standard conditions of approval that require monitoring by an archaeologist and Native American tribal monitor for any grading activities that occur in previously undisturbed areas. These standard conditions have been developed in coordination with local tribes.

The Hampton Inn parcels are fully developed, and no redevelopment is proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any archaeological resources impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, no new impacts are identified for this issue area. The previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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c) **Disturb any human remains, including those interred outside of formal cemeteries?**

**FEIR Conclusion: Less than Significant Impact.** The FEIR (page 3.4-9) did not identify any human remains or find any indications that they would be expected to be found on the UDSP site.

Additionally, the parcels analyzed in the 2022 FEIR Addendum, which include the proposed CubeSmart project site, were not identified as likely to contain human remains. Future development would be required to adhere to mitigation measures CR-1 through CR-5, which address archaeological monitoring during grading and the treatment of human remains should they be encountered during grading (2022 FEIR Addendum page 42).

**Discussion of the Proposed Project:** Development under the proposed CubeSmart project would occur within the footprint analyzed in the 2022 FEIR Addendum. The proposed CubeSmart project site does not support any known human remains. Future development within the UDSP planning area is required to adhere to mitigation measures CR-1 through CR-5, which address archaeological monitoring requirements during grading the treatment of human remains should they be encountered during grading. Additionally, any development that results in grading is subject to the City's standard conditions of approval that require monitoring by an archaeologist and Native American tribal monitor for any grading activities that occur

in previously undisturbed areas. These standard conditions have been developed in coordination with local tribes.

Additionally, future development is required to adhere to the California Health and Safety Code Section 7050.5, which requires that if human remains, or remains that are potentially human, are found on the project site during ground disturbing activities or during archaeological work, the person responsible for the excavation, or his or her authorized representative, shall immediately notify the San Diego County Medical Examiner's Office by telephone.

The Hampton Inn parcels are fully developed, and no redevelopment is proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any cultural resources impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, no new impacts are identified for this issue area and the previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project

***Finding:*** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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**6. ENERGY – Would the project:**

- a) **Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?**

***FEIR Conclusion: Not Analyzed/ Less than Significant.*** The requirement to analyze a project's potential impacts related to energy demand and use as a separate environmental topic became a requirement after certification of the FEIR.

Per the 2022 FEIR Addendum (page 43), the 2022 Amendment resulted in an overall reduction in development intensity. Based on the energy use analysis prepared for the 2022 FEIR Addendum, natural gas and electricity use would be lower compared to the energy usage anticipated under the previously approved UDSP (2022 FEIR Addendum page 43).

***Discussion of the Proposed Project:*** The proposed CubeSmart project would decrease the overall intensity of development for the project site compared to what could be developed under the Office/Commercial District designation (up to six stories of mixed use or freeway commercial) and what was analyzed in the UDSP FEIR and Addenda. Therefore, the CubeSmart project's energy usage would be less than what was analyzed in the FEIR and 2022 FEIR Addendum. Therefore, the conclusions in the FEIR and 2022 FEIR Addendum are still applicable to the proposed project, and no new impacts beyond those identified in the FEIR are identified.

Applicable energy efficiency measures required by the City's CAP and Title 24 of the California Building Code (CBC) would be implemented by the CubeSmart project and would improve the efficiency of the project in terms of energy consumption. Therefore, energy use from the proposed CubeSmart project would not result in wasteful, inefficient, or an unnecessary use of energy.

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. Therefore, no changes in energy demand would occur. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, the conclusions in the FEIR and 2022 FEIR Addendum are still applicable to the proposed project, and no new impacts beyond those identified in the FEIR are identified.

**Finding:** There are no new significant impacts for this issue area and no changes in information that would require preparation of an EIR.

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**b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

**FEIR Conclusion: Not Analyzed/ Less than Significant.** The requirement to analyze a project's potential to conflict with or obstruct a state or local plan for renewable energy or energy efficiency as a separate environmental topic became a requirement after certification of the FEIR.

Per the 2022 FEIR Addendum (page 43), the 2022 Amendment to the UDSP resulted in an overall reduction in development intensity and therefore a reduction in energy usage. The 2022 FEIR Addendum concluded that since the proposed project would follow applicable energy standards and regulations during the construction and operation phases including all existing, applicable building regulations and Climate Action Plan (CAP) measures at the time of construction, the proposed project would not obstruct a state or local plan for renewable energy or energy efficiency, and impacts would be less than significant (2022 FEIR Addendum pages 43-44).

**Discussion of the Proposed Project:** The proposed CubeSmart project would also be required to follow applicable energy standards and regulations during the construction and operation phases. Additionally, the proposed CubeSmart project would be built and operated in accordance with all existing, applicable building regulations at the time of construction. Furthermore, the CubeSmart project would be consistent with all actions in the CAP Consistency Review Checklist (CAP Checklist).

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. Therefore, no changes in energy demand nor any potential for conflict with or obstruction of a state or local plan for renewable energy or energy efficiency would occur. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, the proposed project would not obstruct a state or local plan for renewable energy or energy efficiency, and the conclusions in the FEIR and 2022 FEIR Addendum are still applicable to the proposed project.

**Finding:** There are no new significant impacts for this issue area and no changes in information that would require preparation of an EIR.

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7. GEOLOGY AND SOILS – Would the project:

- a) Directly or indirectly cause 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.)

***FEIR Conclusion: Less than Significant.*** The FEIR (page 3.5-6) did not identify any known active faults within or adjacent to the UDSP site. The UDSP site is not located within a mapped Alquist-Priolo Earthquake Fault Zone as shown on United States Geological Survey (USGS) or California Geological Survey (CGS) maps.

The 2022 Amendment to the UDSP expanded the UDSP planning area to include the addition of two parcels located east of Industrial Street and the railroad tracks. One of these parcels, APN 220-201-90-00, is associated with the proposed CubeSmart project site. Per the 2022 FEIR Addendum (page 44), the additional parcels were not delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, nor are they otherwise identified as containing a fault.

***Discussion of the Proposed Project:*** Development under the proposed CubeSmart project would still occur within the footprint analyzed in the 2022 FEIR Addendum. The CubeSmart project site is not delineated on the Alquist-Priolo Earthquake Fault Zoning Map, nor is the site otherwise identified as containing a fault. Additionally, an updated geotechnical investigation for APN 220-201-90-00, a portion of which includes the CubeSmart project site, concluded that there are no faults or other geologic hazards located on this parcel (GEI 2021). A more recent update to that report (2025) confirmed that the design and construction recommendations presented in the 2021 report remain applicable to the currently proposed project (GEI 2025). This report and update letter are included in Appendix B.

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any geology and soils impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, no new impacts are identified for this issue area. The previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

***Finding:*** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.



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ii) **Strong seismic ground shaking?**

**FEIR Conclusion: Less than Significant.** The FEIR (page 3.5-6) and 2022 FEIR Addendum (page 45) concluded that since future development would be held to the requirements of the Uniform Building Code (UBC) for Zone 4 for resistance to seismic shaking, a less than significant impact would occur.

**Discussion of the Proposed Project:** Development under the proposed CubeSmart project would still occur within the footprint analyzed in the 2022 FEIR Addendum. Per the 2021 geotechnical investigation update, the closest fault zones in the vicinity of the site are the active Rose Canyon and Coronado Bank fault zones mapped approximately 15 and 25 miles southwest of the site, respectively, and the active Elsinore and San Jacinto fault zones mapped approximately 17 and 41 miles northeast of the site, respectively (GEI 2021). Though strong ground shaking is likely to occur in the event of a moderate to major earthquake, the project site would be required to comply with the Uniform Building Code (UBC) for resistance to seismic shaking as well as recommendations provided in the 2021 geotechnical investigation (GEI 2021, pages 5-12). The 2025 geotechnical report update confirmed that the design and construction recommendations presented in the 2021 report remain applicable to the currently proposed project (GEI 2025).

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any geology and soils impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, no new impacts are identified for this issue area. The previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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iii) **Seismic-related ground failure, including liquefaction?**

**FEIR Conclusion: Less than Significant.** The FEIR (page 3.5-9) concluded the project area is not susceptible to liquefaction due to such factors as density and grain size distribution of the relatively thin and dense colluvial soils, Santiago Formation and granitic rock underlying the site. Based on the soil type on the project site and lightly occurring groundwater, impacts from liquefaction would be less than significant.

Per the 2022 FEIR Addendum (page 45), the two additional parcels are identified as having zero susceptibility for geologic hazards in Figure 6-1, Geologic Hazards-Soils Slippage Susceptibility (Landslides/ Liquefaction) of the Safety Element of the San Marcos General Plan.

**Discussion of the Proposed Project:** Development under the proposed CubeSmart project would still occur within the footprint analyzed in the 2022

FEIR Addendum. As noted, according to Figure 6-1, Geologic Hazards- Soils Slippage Susceptibility (Landslides/ Liquefaction) of the Safety Element of the San Marcos General Plan, the project site is identified as having zero susceptibility for geologic hazards. Additionally, the 2021 geotechnical investigation update concluded that there are no geologic hazards on this parcel that would make the site unsuitable for development with adherence to standard geotechnical practices and recommendations provided in the 2021 GEI report (GEI 2021, pages 5-12). The 2025 geotechnical report update confirmed that the design and construction recommendations presented in the 2021 report remain applicable to the currently proposed project (GEI 2025).

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any geology and soils impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, no new impacts are identified for this issue area. The previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

***Finding:*** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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#### iv) Landslides?

***FEIR Conclusion: Less than Significant.*** As described in the FEIR (page 2-13), the UDSP area ranges from 550 to 710 feet above mean sea level (AMSL) elevation. The UDSP area is underlain with Cretaceous-aged granitic rock and sandy and silt loam soils. These identified soils and elevations would not be subject to landslides; therefore, impacts due to landslides were determined to be less than significant.

The 2022 FEIR Addendum (page 45) noted that the additional parcels are identified as having zero susceptibility for geologic hazards, including landslides, in the City's General Plan Safety Element (Figure 6-1) and no new or additional impacts would occur.

***Discussion of the Proposed Project:*** Development under the proposed project would still occur within the footprint analyzed in the 2022 FEIR Addendum. As noted, according to Figure 6-1, Geologic Hazards- Soils Slippage Susceptibility (Landslides/ Liquefaction) of the Safety Element of the San Marcos General Plan, the project site is identified as having zero susceptibility for geologic hazards. Additionally, the 2021 geotechnical investigation update concluded that there are no geologic hazards on this parcel that would make the site unsuitable for development with adherence to standard geotechnical practices and recommendations provided in the report (GEI 2021). The 2025 geotechnical report update confirmed that the design and construction recommendations presented in the 2021 report remain applicable to the currently proposed project (GEI 2025).

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any geology and soils impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, no new impacts are identified for this issue area. The previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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

**FEIR Conclusion: Less than Significant.** The FEIR (page 3.5-9) and 2022 FEIR Addendum (page 46) identified soil materials on the UDSP project site to range from slight to high potential for erosion. Implementation of a project-specific Erosion Control Plan and a Storm Water Pollution Prevention Plan (SWPPP) in accordance with the California State Water Resources Control Board Order No. 92-08-DWQ, NPDES General Permit No. CAS000002 would minimize the potential for erosion and runoff from rain events. The SWPPP would comply with Best Available Technology (BAT) and Best Conventional Pollutant Control Technology to reduce or eliminate storm water pollution from areas of construction activity.

**Discussion of the Proposed Project:** Development under the proposed CubeSmart project would still occur within the footprint analyzed in the 2022 FEIR Addendum. The CubeSmart project would be required to comply with the City's BMP Design Manual (City of San Marcos 2023). Adherence to the requirements in the BMP Design Manual along with a SWPPP, would minimize the potential for erosion and runoff from rain events. Therefore, no new impacts are identified for this issue area.

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any geology and soils impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

The previous FEIR and 2022 FEIR Addendum are still applicable for the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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- 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?**

***FEIR Conclusion: Mitigated to Below a Level of Significance.*** The FEIR (page 3.5-7) identified the UDSP area as being underlain with Santiago Formation and granitic rock, which are typically not susceptible to liquefaction. The soils derived from the underlain material and bedrock includes very fine to coarse sandy loams and rocky silt loams. Based on the underlying bedrock and the soil composition of the project site, the FEIR determined that impacts due to landslides would be considered less than significant. The FEIR (page 3.5-10) also identified compressible soils located in a portion of the project area located along Barham Drive and mitigation was identified to reduce the potential impact to below a level of significance (GEO-1). Mitigation measures were identified in the FEIR and would still be applicable to the proposed project.

The 2022 FEIR Addendum (page 47) noted that the additional parcels are identified as having zero susceptibility for geologic hazards, including landslides and liquefaction in the City's General Plan Safety Element (Figure 6-1) and no new or additional impacts would occur.

***Discussion of the Proposed Project:*** Development under the proposed CubeSmart project would still occur within the footprint analyzed in the 2022 FEIR Addendum. As noted, according to Figure 6-1, Geologic Hazards- Soils Slippage Susceptibility (Landslides/ Liquefaction) of the Safety Element of the San Marcos General Plan, the project site is identified as having zero susceptibility for geologic hazards, including landslides and liquefaction. Additionally, the 2021 geotechnical investigation update concluded that there are no geologic hazards on this parcel that would make the site unsuitable for development with adherence to standard geotechnical practices and recommendations provided in the report (GEI 2021, pages 5-12). The 2025 geotechnical report update confirmed that the design and construction recommendations presented in the 2021 report remain applicable to the currently proposed project (GEI 2025).

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any geology and soils impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, no new impacts are identified for this issue area. The previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

***Finding:*** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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- 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?**

**FEIR Conclusion: Less than Significant.** The FEIR (page 3.5-9) identified the UDSP area to consist predominantly of very fine to course, well-drained sandy loams, which have a low potential for expansion.

The 2022 FEIR Addendum (page 48) did not note any expansive soils on the additional parcels added to the UDSP planning area. Impacts were determined to be less than significant.

**Discussion of the Proposed Project:** Development under the proposed CubeSmart project would still occur within the footprint analyzed in the 2022 FEIR Addendum. The 2021 geotechnical investigation update did not identify any soils with high expansion potential. Additionally, the CubeSmart project would be required to adhere to the geotechnical recommendations included in the 2021 report including those investigations included in the report, (GEI 2021, pages 5-12). The 2025 geotechnical report update confirmed that the design and construction recommendations presented in the 2021 report remain applicable to the currently proposed project (GEI 2025).

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any geology and soils impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, no new impacts are identified for this issue area. The previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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**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?**

**FEIR Conclusion: No Impact.** The FEIR (page 3.5-9) and 2022 FEIR Addendum (page 48) identified that the UDSP project would not be serviced by either septic tanks or alternative wastewater disposal system.

**Discussion of the Proposed Project:** The use of septic tanks or alternative wastewater disposal systems is not proposed under the proposed project. Water and wastewater services would be provided by Vallecitos Water District (VWD). The Hampton Inn site is already developed and served by VWD. No redevelopment or operational changes are proposed. Therefore, no new impacts are identified for this issue area. The previous FEIR and 2022 FEIR Addendum are still applicable for the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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f) **Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

**FEIR Conclusion: Less than Significant.** The FEIR (page 3.4-9) identified that new ground-disturbing activity has the potential to unearth previously unidentified paleontological resources, particularly in areas underlain by sedimentary formations. However, due to the young age of the Quaternary alluvial deposits on the project site, the potential for paleontological resources was determined to be low. Impacts were determined to be less than significant.

The 2022 FEIR Addendum (page 48) did not identify paleontological impacts for the additional parcels added to the UDSP planning area.

**Discussion of the Proposed Project:** Development under the proposed CubeSmart project would still occur within the footprint analyzed in the 2022 FEIR Addendum. The CubeSmart site was recently graded, and stormwater runoff transmission and containment structures were constructed.

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any paleontological resources impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

No new impacts are identified for this issue area. The previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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**8. GREENHOUSE GAS EMISSIONS – Would the project:**

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

**FEIR Conclusion: Significant and Unmitigated.** The FEIR (page 3.2-20) analyzed both construction and operational GHG emissions. Impacts were determined to be less than significant as the UDSP project would reduce GHG emissions by approximately 43 percent below “business as usual”. The FEIR (page 3.2-30) concluded that project-level GHG impacts were less than significant.

With regard to cumulative GHG emissions, even with the implementation of sustainable policies and reduction measures identified as part of the project, cumulative greenhouse gas emissions were determined to be significant and unmitigable due to the legal, regulatory, and factual uncertainty regarding the proper greenhouse gas significance threshold, the method for creating thresholds, and the effectiveness of mitigation measures in actually reducing greenhouse gas emissions (page 7-2). These uncertainties made it speculative to conclude that cumulative impacts are adequately reduced to below a level of significance.

The 2022 FEIR Addendum (page 51), which addressed adding two parcels APN 220-201-90-00 (Zirpolo) and APN 220-202-18-00 (NCTD) to the UDSP planning area,

included a GHG analysis. The analysis concluded that GHG emissions for the entire UDSP would be reduced by 19%.

***Discussion of the Proposed Project:*** Since certification of the FEIR, the City of San Marcos adopted a CAP. A project applicant can demonstrate compliance with the CAP by filling out the CAP Checklist. Consistency with the CAP would allow the City to determine that GHG impacts would be less than significant. The completed CAP Consistency Worksheet is included as Appendix C of this document.

### **Analysis Methodology**

The CAP Consistency Guidance Memo summarizes the methodology and application of a GHG screening threshold which is set at 500 metric tons of carbon dioxide equivalent (MTCO<sub>2e</sub>) per year (Ascent Environmental 2020). Projects that are projected to emit fewer than 500 MTCO<sub>2e</sub> annually would not make a considerable contribution to the cumulative impact of climate change and would not need to provide additional analysis to demonstrate consistency with the CAP. This screening threshold is for new development projects consistent with the City's General Plan. When such a project exceeds the screening threshold, the project would be required to demonstrate consistency with the CAP through the CAP Checklist.

In most cases, compliance with the CAP Checklist would provide a streamlined CEQA review path to allow project specific environmental documents, if eligible, to tier from and/or incorporate by reference the CAP's programmatic review of GHG impacts. Projects that are consistent with the General Plan and implement CAP GHG reduction measures may incorporate by reference the CAP's cumulative GHG analysis. The City's CAP meets the requirements under Section 15183.5 of the CEQA Guidelines as a qualified plan for the reduction of GHG emissions for use in cumulative impact analysis pertaining to development projects.

If a project is consistent with the existing General Plan land use designation(s), it can be determined to be consistent with the CAP projections and can move forward to Step 2 of the CAP Checklist. For projects seeking a plan amendment, such as the proposed project, the CAP Checklist requires a comparative analysis to determine if the amendment results in an equivalent or less GHG-intensive project when compared to the existing designations. In addition to providing evidence to support the conclusion that the project would generate fewer emissions than existing designations, these projects would demonstrate consistency with the CAP through completion of Step 2 of the CAP Checklist (CAP Measures Consistency)

If a land use designation amendment results in a more GHG-intensive project, the project is required to prepare a quantitative GHG analysis based on applicable sections of the CEQA Guidelines.

### **Analysis**

A greenhouse gas assessment was prepared for the CubeSmart project by LDN Consulting (LDN 2025a). The GHG assessment is included as Appendix D. The analysis considers GHG emission for both construction and operation of the CubeSmart project and compares that to anticipated GHG emissions under a development scenario consistent with the current UDSP Office/Commercial designation.

Under the current designation, a reasonable development scenario is a 200,000 s.f. multi-story office building with 500 parking spaces. Construction and operation of a development scenario of this size would result in 2,267.06 MT CO<sub>2e</sub> per year of

emissions. Development under the proposed CubeSmart project would result in approximately 406.33 MT CO<sub>2</sub>e per year. Thus, the proposed CubeSmart project would reduce GHG emissions by over 80% compared to what could be realized under the current designation. Therefore, the proposed CubeSmart project would be consistent with the CAP. Additionally, since the CubeSmart GHG emissions would be under 500 MT CO<sub>2</sub>e, it would not be subject to the CAP Measures. However, the proposed CubeSmart project would voluntarily implement applicable CAP Measures. These measures include: providing bicycle infrastructure improvements, implementation of transportation demand management measures, installation of rooftop photovoltaic (PV) solar, and compliance with the City's Water Efficient Landscape Ordinance (WELO). Therefore, as indicated in the CAP Checklist, the CubeSmart project's GHG impacts would be less than significant.

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. GHG emissions from those parcels would have been considered during the development of the CAP. No changes of use are proposed for the Hampton Inn parcels so no additional GHG emissions are anticipated. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

**Finding:** There are no new significant impacts for this issue area and no changes in information that would require preparation of an EIR.

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**b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

**FEIR Conclusion: Significant and Unmitigated.** With regard to cumulative GHG emissions, even with implementation of sustainable policies and reduction measures identified as part of the project, cumulative greenhouse gas emissions were determined to be significant and unmitigable due to the legal, regulatory, and factual uncertainty regarding the proper greenhouse gas significance threshold, the method for creating thresholds, and the effectiveness of mitigation measures in actually reducing greenhouse gas emissions (FEIR page 7-2). These uncertainties made it speculative to conclude that cumulative impacts are adequately reduced to below a level of significance.

The 2022 FEIR Addendum (page 51) concluded that GHG emissions for the entire UDSP would be reduced by 19% and as a result would be consistent with the CAP.

**Discussion of the Proposed Project:** Per the City's CAP Consistency Guidance Memo, CAP consistency can be assumed as long as the amendment results in an equivalent or less GHG-intensive project when compared to the existing designations. In addition to providing evidence to support the conclusion that the project would generate fewer emissions than existing designations, these projects would demonstrate consistency with the CAP through completion of Step 2 of the Checklist. As detailed in 8.a, above, the proposed CubeSmart project would result in an 80% reduction in GHG emissions compared to what could be realized with buildout under the current UDSP designation of Office/Commercial. Thus, the CubeSmart project would comply with the CAP. Based on this, a less than significant impact would be expected by the proposed CubeSmart project.

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. GHG emissions from those parcels would have been



considered during the development of the CAP. No changes of use are proposed for the Hampton Inn parcels so no additional GHG emissions are anticipated. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

**Finding:** There are no new significant impacts for this issue area and no changes in information that would require preparation of an EIR.

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**9. 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?**

**FEIR Conclusion: Mitigated to Below a Level of Significance.** As identified in the FEIR (page 3.6-6), and 2022 FEIR Addendum (page 51) there is potential for accidental upset of fuels, lubricants or various other liquids needed for the operation of construction equipment. Mitigation was included in the FEIR to reduce the potential for impacts to below a level of significance (BIO-1C). This mitigation measure requires a 100-foot buffer between fueling areas and sensitive habitat.

**Discussion of the Proposed Project:** Fueling of construction equipment would still be required during construction under the proposed CubeSmart project. Mitigation identified in the FEIR would still be applicable and would ensure that impacts remain mitigated to below a level of significance.

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any hazards and hazardous materials impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, no new impacts are identified for this issue area and the previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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- 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?**

**FEIR Conclusion: Mitigated to Below a Level of Significance.** As identified in the FEIR (page 3.6-8), and 2022 FEIR Addendum (page 52), potential impacts related to hazardous materials were identified due to the presence of lead-based paint, pesticide use, solid waste disposal, and asbestos-containing materials. Mitigation was included in the FEIR to reduce these impacts to below a level of significance. These measures require testing for lead-based paint and asbestos prior to demolition (HAZ-1 and HAZ-2). The mitigation also requires the clean-up of debris on the project site (HAZ-3) and testing of soils in areas where previous agricultural activities occurred (HAZ-4).

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**Discussion of the Proposed Project:** Development under the proposed CubeSmart project would occur within the footprint analyzed in the 2022 FEIR Addendum. The CubeSmart site is currently undeveloped and would not require demolition. A Phase I Environmental Site Assessment (Phase 1 ESA) was prepared for the larger Carmel Enterprise Property which includes the proposed CubeSmart project site in February 2024 by PIC Environmental Services (Appendix E). According to the Phase I ESA, while the project site was apparently used for limited agricultural purposes such as dry farming and/or livestock grazing during and prior to the 1950s, it appeared unlikely that there were any significant adverse impacts to the site. There were no recognized environmental conditions (RECS) identified for the project site based on review of historical information. Also, PIC did not identify evidence of the storage or use of hazardous materials or regulated substances at the project site. Additionally, there was no evidence that the CubeSmart site had been adversely affected by contamination on adjacent or nearby properties and it is unlikely that the site had been adversely affected by the releases of hazardous or regulated substances at any sites in the vicinity (PIC 2024). In conclusion, the Phase I ESA revealed no evidence of any RECs in connection with the CubeSmart project site and PIC recommends no further action regarding environmental site assessment and/or mitigation. Mitigation measure HAZ-3 which requires the cleanup of any debris on the project site would still be required.

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any hazards and hazardous materials impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, no new impacts are identified for this issue area. The previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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

**FEIR Conclusion: Less than Significant.** As identified in the FEIR (page 3.6-5), there are no known public or private schools located within one-quarter mile of the proposed project that would subject sensitive receptors to any hazardous materials due to the proposed project. Impacts related to this topic were determined to be less than significant during the Initial Study process for the FEIR. The 2022 FEIR addendum (Page 52) also determined that no new impacts would occur related to hazardous materials near an existing or proposed school.

**Discussion of the Proposed Project:** Development under the proposed CubeSmart project would occur within the footprint analyzed in the 2022 FEIR Addendum. The proposed self-storage uses would not be characterized as uses that would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste. Therefore, no new impacts are identified for this issue area.

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. Development of the Hampton Inn was analyzed in Negative

Declaration #99-527 and any hazards and hazardous materials impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

The previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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**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?**

**FEIR Conclusion: Less than Significant.** The FEIR (page 3.6-2) included a hazards database records search. The database search did not identify any areas of concern within the UDSP area and impacts were determined to be less than significant.

The 2022 Amendment to the UDSP expanded the UDSP planning area to include the addition of two parcels located east of Industrial Street and the railroad tracks. One of these parcels, APN 220-201-90-00, is associated with the proposed CubeSmart project site. Per the 2022 FEIR Addendum, no new areas of concern were identified within the UDSP planning area and additional parcels (2022 FEIR Addendum page 53).

**Discussion of the Proposed Project:** Development under the proposed CubeSmart project would occur within the footprint analyzed in the 2022 FEIR Addendum. A Phase I ESA was prepared for the larger Carmel Enterprise Property which includes the proposed CubeSmart project site in February 2024 by PIC Environmental Services (Appendix E). A FirstSearch Report including a search of current Federal, State, and Local regulatory agency databases was conducted by Environmental Data Resources, Inc. (EDR) and is included within the Phase I ESA. Based on review of the database records, PIC concluded that it is unlikely that the subsurface soil, groundwater, or soil vapor beneath the project site have been adversely impacted in association with any of the sites listed in the attached EDR FirstSearch Report. In PIC's judgement, none of these sites represent a recognized environmental condition in connection with the project site, based on the nature of the listings and the locations of the listed properties (PIC 2024).

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any hazards and hazardous materials impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, no new impacts are identified for this issue area. The previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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- 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 or excessive noise for people residing or working in the project area?

***FEIR Conclusion: Less than Significant.*** The FEIR (page 3.6-5) noted that the nearest airport is McClellan-Palomar airport, located approximately five miles west of the UDSP area. The influence area is regulated by the Airport Land Use Commission (ALUC), which regulates land uses in the area to be compatible with airport-related noise, safety, airspace protection, and over-flight factors. The project area is located within Review Area 2, which consists of limits on heights of structures in areas of high terrain. Impacts were determined to be less than significant as part of the Initial Study process for the FEIR.

The 2022 Amendment to the UDSP expanded the UDSP planning area to include the addition of two parcels located east of Industrial Street and the railroad tracks. One of these parcels, APN 220-201-90-00, is associated with the proposed CubeSmart project site. Additionally, the 2022 Amendment to the UDSP allowed for greater building heights within several areas of the UDSP with a maximum of 16-stories (185 feet maximum) compared to the 7-stories (90 foot maximum) under the previously approved UDSP. All development on the site would be situated at a lower elevation than adjacent topography, including the hills to the southeast of CSUSM. As part of the review for the 2022 FEIR Addendum (pages 53-54), the City contacted the San Diego County Regional Airport Authority (SDCRAA) ALUC.

The ALUC reconfirmed that the project site is within the Airport Influence Area (AIA) of the adopted Airport Land Use Compatibility Plan (ALUCP) for the McClellan-Palomar Airport in Carlsbad, specifically in Review Area 2. The ALUC indicated that the project requires no submission to the ALUC for a consistency determination. However, the ALUCP reinforces existing federal and state requirements regarding Federal Aviation Administration (FAA) review of proposed projects within the AIA, which requires project sponsors to file an FAA Notice of Proposed Construction or Alteration (Form 7460-1) to address potential airspace conflicts, unless determined unnecessary.

In accordance with the adopted McClellan-Palomar Airport ALUCP and Title 14 of the Code of Federal Regulations (14 CFR) Part 77, the ALUC requests that prior to construction or alteration of existing structures that fall within the jurisdiction of the City of San Marcos and the AIA, the necessary notice information be provided to the FAA. If the FAA determines that the proposed structure or temporary construction crane would be a hazard or obstruction to air navigation the proposed project would then require submittal to the ALUC for review. This requirement was included as a condition of project approval and the City agreed to coordinate, as required with the FAA at the time development or alteration of buildings is proposed.

The 2022 FEIR Addendum (pages 53-54) concluded that the project would not result in a safety hazard or excessive noise from airport traffic for people residing or working in the project area and the previous conclusion of less than significant impact would still apply.

***Discussion of the Proposed Project:*** Development under the proposed CubeSmart project would occur within the footprint analyzed in the 2022 FEIR Addendum. The CubeSmart project proposes a 3-story building, and a 1-story building so would not

exceed previously approved building heights. No new impact related to safety hazards or excessive noise from airport traffic would occur.

The Hampton Inn parcels are fully developed with a three-story hotel and associated parking. No redevelopment of the Hampton Inn site or operational changes are proposed as part of the proposed project. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

The previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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f) **Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

**FEIR Conclusion: No Impact.** The UDSP Initial Study (page 21, see Appendix A.2 of the FEIR) concluded that the additional roadway access will improve circulation, allowing for improved emergency services access and would not physically interfere with any adopted emergency response plans or emergency evacuation plans. No impact was identified for this issue area in the FEIR.

The 2022 Amendment to the UDSP expanded the UDSP planning area to include the addition of two parcels located east of Industrial Street and the railroad tracks. One of these parcels, APN 220-201-90-00, is associated with the proposed CubeSmart project site. Additionally, the 2022 Amendment to the UDSP included modifications to roadway design and underground parking lots but ensured that emergency vehicle response would not be impeded. The 2022 FEIR Addendum (pages 54-55) determined that there would be no new issues related to emergency response planning or evacuation.

**Discussion of the Proposed Project:** Development under the proposed CubeSmart project would occur within the footprint analyzed in the 2022 FEIR Addendum. Access to the CubeSmart site would be from a driveway on E. Carmel Street and access to the self-storage buildings would be controlled via entrance and exit gates with a keypad. The Fire Marshal has reviewed the CubeSmart project and has not indicated any issues related to emergency response planning or evacuation.

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any hazards and hazardous materials impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, no new impacts are identified for this issue area. The conclusions in the FEIR and 2022 FEIR Addendum are still applicable to the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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- g) 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?

**FEIR Conclusion: Less than Significant.** The FEIR (page 3.6-7) identified that approximately 50 percent of the UDSP area is undeveloped and supports vegetation and noted that the proposed UDSP development with maintained parks and urban open spaces would reduce the danger of wildfires. Per the FEIR, impacts were determined to be less than significant for the UDSP.

The 2022 Amendment to the UDSP expanded the UDSP planning area to include the addition of two parcels located east of Industrial Street and the railroad tracks. One of these parcels, APN 220-201-90-00, is associated with the proposed CubeSmart project site. The 2022 FEIR Addendum (page 55) concluded that the project site is not located on or near lands classified as a very high fire hazard severity zone. The project site is located within a Non-Very High Fire Hazard Severity Zone (Non-VHFHSZ) designation per CalFire's San Marcos Fire Hazards Severity Zones Map and is surrounded by areas also identified as Non-VHFHSZ (CAL FIRE 2022). Further, per Figure 6-4 of the Safety Element of the City's General Plan, the project site and surrounding area are not identified as a SMFPD Community Hazard Zone. Thus, the 2022 FEIR Addendum concluded that the proposed project would not 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.

**Discussion of the Proposed Project:** Development under the proposed CubeSmart project would occur within the footprint analyzed in the 2022 FEIR Addendum. No new impacts are identified for this issue area.

The Hampton Inn parcels are fully developed and are not adjacent to wildland areas. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any hazards and hazardous materials impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

The conclusions of the FEIR and 2022 FEIR Addendum are still applicable to the project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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## 10. HYDROLOGY AND WATER QUALITY – Would the project:

- a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

**FEIR Conclusion: Less than Significant.** The FEIR (page 3.7-20) prepared for the UDSP identified significant impacts related to water quality; however, mitigation measures were identified (HW-1 and HW-2) to reduce the impacts to below a level of significance. These measures related to the design of the Johnston Lane SR-78 flyover bridge to minimize water quality impacts and the preparation of project-

specific Water Quality Technical Reports as individual development projects come forward.

The 2022 Amendment removed the Johnston Lane SR-78 flyover bridge which eliminated the potential impact related to the placement of bridge structural supports within San Marcos Creek. Thus, no new impacts were identified for this issue area in the 2022 FEIR Addendum (page 55).

***Discussion of the Proposed Project:*** While development under the proposed CubeSmart project could still have the potential to impact water quality, development would be required to comply with the City's BMP Design Manual (City of San Marcos 2023). A preliminary drainage study and Storm Water Quality Management Plan (SWQMP) were prepared for the proposed project by Stevens Cresto Engineers (SCE) dated March 14, 2025 (SCE 2025a and SCE 2025b) and are included in Appendix F and Appendix G.

As described in the SWQMP, runoff generated by the proposed CubeSmart project would be conveyed via a proposed private storm drain system into two proposed private underground detention systems (UD-1 and UD-2). A flow control/bypass structure downstream of each underground detention system would route the design capture value (DCV) into a corresponding proposed private proprietary biofiltration system (PBF-1 and PBF-2). Runoff would then continue downstream via a proposed private storm drain system into an existing box culvert which flows under E. Carmel Street and SR-78 and continues through an existing reinforced concrete pipe which ultimately discharge to San Marcos Creek. San Marcos Creek flows southwest, to Lake San Marcos, and then continues to Batiquitos Lagoon, ultimately discharging to the Pacific Ocean.

The drainage study concludes that the CubeSmart project's flow rates at Point of Confluence (POC) 1 would not exceed pre-project flow rates (SCE 2025a). CubeSmart's SWQMP includes source control, site design and structural BMPs that would reduce potential water quality impacts to below a level of significance.

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any hydrology/water quality impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, no new impacts are identified for this issue area. The conclusions in the FEIR and 2022 FEIR Addendum are still applicable to the proposed project.

***Finding:*** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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**b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there the project may impede substantial groundwater management of the basin?**

***FEIR Conclusion: Less than Significant.*** The FEIR (page 5-2) noted that some groundwater may be used for irrigation. The FEIR noted that implementation of the Specific Plan would likely increase the amount of impermeable surface area compared to the current condition, but percolation will still occur in areas where

grass, permeable pavement, and groundcover are proposed. The FEIR concluded that implementation of the UDSP would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge and impacts are anticipated to be less than significant.

The 2022 FEIR Addendum (page 56) noted that potable water service would continue to come from VWD, and some groundwater may be used for irrigation within the larger UDSP planning area. No new impacts were identified for this issue area.

**Discussion of the Proposed Project:** The proposed CubeSmart project would be located within the same footprint as analyzed in the 2022 FEIR Addendum. The CubeSmart project does not propose an increase in groundwater use. Potable water service would continue to come from VWD.

The Hampton Inn parcels are fully developed and are served by VWD. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any hydrology/water quality impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

The conclusions of the FEIR and 2022 FEIR Addendum are still applicable to the project and no new impacts are identified for this issue area.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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

**FEIR Conclusion: Less than Significant.** The FEIR (page 3.7-16) identified that the UDSP project, upon build-out, is anticipated to increase flow rates in San Marcos Creek by 385.5 cubic feet per second (cfs) to 1,848.3 cfs. The San Marcos Creek flow rate during a 100-year storm event is approximately 12,400 cfs. Based upon a longer 100-year runoff time of concentration of the San Marcos Creek drainage basin, peak flows for the creek will not occur concurrently with peak flows for the project drainage basin. Thus, a less than significant impact was identified in the FEIR. Similarly, the 2022 FEIR Addendum identified less than significant impacts for this issue area (page 56).

**Discussion of the Proposed Project:** Per the drainage study prepared for the CubeSmart self-storage project, the post-project condition would maintain pre-project drainage patterns and flow rates. The drainage study concludes that the project's flow rates at POC 1 would not exceed pre-project flow rates (SCE 2025a). The CubeSmart project's SWQMP includes source control, site design and structural BMPs that would reduce potential water quality impacts to below a level of significance (SCE 2025b). Therefore, the proposed CubeSmart project would not generate increased runoff volumes and includes a comprehensive approach to stormwater and drainage management. No new impacts related to substantial erosion or siltation are identified for this issue area.

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. Development of the Hampton Inn was analyzed in Negative



Declaration #99-527 and any hydrology/water quality impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, the conclusions of the FEIR and 2022 FEIR Addendum are still applicable to the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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

**FEIR Conclusion: Less than Significant.** The FEIR (page 3.7-19) concluded that the UDSP project would maintain the same major discharge points as the existing conditions. Flow volume at identified discharge point two during a 100-year storm could not be accommodated by the existing 24-inch storm drain. An overland release would be constructed to route some of the flow volume to discharge point three to directly discharge to San Marcos Creek, which is determined to have adequate capacity. Thus, implementation would not result in flooding.

Similarly, the 2022 FEIR Addendum identified less than significant impacts for this issue area (page 58).

**Discussion of the Proposed Project:** Per the drainage study prepared for the CubeSmart self-storage project, the post-project condition would maintain pre-project drainage patterns and flow rates. The drainage study concludes that the project's flow rates at POC 1 would not exceed pre-project flow rates (SCE 2025a). The CubeSmart project's SWQMP includes source control, site design and structural BMPs that would reduce potential water quality impacts to below a level of significance (SCE 2025b). Therefore, the proposed CubeSmart project would not generate increased runoff volumes and includes a comprehensive approach to stormwater and drainage management. No new impacts related to flooding on or off site are identified for this area.

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any hydrology/water quality impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, the conclusions of the FEIR and 2022 FEIR Addendum are still applicable to the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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- e) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

**FEIR Conclusion: Less than Significant.** According to the FEIR (page 3.7-19), the UDSP project would maintain the same major discharge points identified under the existing conditions. Thus, the increase in surface runoff would not exceed capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

Similarly, the 2022 FEIR Addendum (page 58) identified less than significant impacts for this issue area.

**Discussion of the Proposed Project:** As discussed above, preliminary drainage study and SWQMP were prepared for the proposed CubeSmart project by SCE (SCE 2025a and SCE 2025b). As described in the SWQMP, runoff generated by the proposed CubeSmart project would be conveyed via a proposed private storm drain system into two proposed private underground detention systems (UD-1 and UD-2). A flow control/bypass structure downstream of each underground detention system would route the flow into a corresponding proposed private proprietary biofiltration system (PBF-1 & PBF-2). Runoff would then continue downstream via a proposed private storm drain system into an existing box culvert which flows under E. Carmel Street and SR-78 and continues through an existing reinforced concrete pipe which ultimately discharge to San Marcos Creek. San Marcos Creek flows southwest, to Lake San Marcos, and then continues to Batiquitos Lagoon, ultimately discharging to the Pacific Ocean.

The drainage study concludes that the project's flow rates at POC 1 would not exceed pre-project flow rates (SCE 2025a). The CubeSmart project's SWQMP includes source control, site design and structural BMPs that would reduce potential water quality impacts to below a level of significance. Implementation of these features would ensure that the proposed development would not exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, no new impacts are identified for this issue area.

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any hydrology/water quality impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

The conclusions in the FEIR and 2022 FEIR Addendum are still applicable to the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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f) **In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?**

**FEIR Conclusion: No impact.** The Initial Study prepared for the FEIR determined that the project would have no impact related to inundation from flood hazards, tsunami or seiche zones (FEIR page 3.7-1). Similarly, the 2022 FEIR Addendum (page 59) concluded that the expanded UDSP area, including the parcel associated with the proposed project, are not areas that would be subject to inundation from flood hazard, tsunami or seiche zone.

**Discussion of the Proposed Project:** The proposed CubeSmart project site is located within the same area as analyzed in the 2022 FEIR Addendum. Therefore, the CubeSmart project is not in a location that would be subject to inundation from flood hazard, tsunami or seiche zone. Therefore, no new impacts are identified for this issue area.

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any hydrology/water quality impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

The conclusions in the FEIR and 2022 FEIR Addendum are still applicable to the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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g) **Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

**FEIR Conclusion: Not Analyzed.** This specific threshold was not analyzed in the FEIR as it was not part of CEQA Guidelines Appendix G at the time the FEIR was prepared.

The 2022 FEIR Addendum (page 59) notes that the project does not propose an increase in groundwater use and potable water service would continue to come from VWD. Some groundwater may be used for irrigation within the larger UDSP planning area. However, the proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

**Discussion of the Proposed Project:** The CubeSmart project does not propose an increase in groundwater use and potable water service would continue to come from VWD. The proposed CubeSmart project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, no new impacts are identified for this issue area.

The Hampton Inn parcels are fully developed with a hotel and served by VWD. No redevelopment or operational changes are proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any hydrology/water quality impacts would have been analyzed and mitigated under that project-specific CEQA

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document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

The conclusions in the FEIR and 2022 FEIR Addendum are still applicable to the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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**h) Result in significant alteration of receiving water quality during or following construction?**

**FEIR Conclusion: Less than Significant.** The FEIR (page 3.7-20) identified the preparation of project-specific SWPPPs per the National Pollutant Discharge Elimination System (NPDES) permit program and implementation of BMPs to prevent construction-related runoff from polluting receiving waters. Additionally, the Specific Plan has been designed to incorporate a variety of BMPs and Low Intensity Design (LID) features to limit the potential for water quality impacts to the greatest extent feasible for a less than significant impact. In addition, a SWQMP will be implemented to reduce potential impacts to receiving water quality to ensure water quality standards and discharge requirements. In addition, the grading plan will comply with the City Municipal Code Grading Ordinance, Chapter 17.32, San Diego County Code of Regulatory Storm Water Ordinances Sections 67.801 through 67.811, and Statewide General Construction Stormwater Permit No. CAS000002. Should SWPPP requirements change, due to changes in permit or City SUSMP requirements, the BMPs used during development and construction would reflect the latest requirements. Therefore, impacts were determined to be less than significant.

Similarly in the 2022 FEIR Addendum (page 60), with the incorporation of a comprehensive water quality management system, impacts to receiving water quality were determined to be less than significant.

**Discussion of the Proposed Project:** As discussed above, CubeSmart's SWQMP includes source control, site design and structural BMPs, including biofiltration systems, that would reduce potential water quality impacts to below a level of significance. Implementation of these features would ensure that the proposed CubeSmart development would not result in significant alteration of receiving water quality during or following construction. Therefore, no new impacts are identified for this issue area.

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any hydrology/water quality impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

The conclusions in the FEIR and 2022 FEIR Addendum are still applicable to the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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i) **Result in an increase in pollutant discharges to receiving waters?**

**FEIR Conclusion: Mitigated to Below a Level of Significance.** The FEIR prepared for the UDSP concluded that with implementation of BMPs, impacts related to an increase in pollutant discharges to receiving waters would be less than significant (page 3.7-15). Similarly, the 2022 FEIR Addendum (page 60) identified less than significant impacts with implementation of BMPs for this issue area,

**Discussion of the Proposed Project:** As discussed above, CubeSmart project's SWQMP includes source control, site design and structural BMPs, including biofiltration systems, that would reduce potential water quality impacts to below a level of significance. Implementation of these features would ensure that the proposed CubeSmart development would not result in an increase in pollutant discharges to receiving waters. Therefore, no new impacts are identified for this issue area.

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any hydrology/water quality impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

The conclusions in the FEIR and 2022 FEIR Addendum are still applicable to the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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j) **Be tributary to an already impaired water body as listed on the Clean Water Act Section 303(d) list. If so, can it result in an increase in any pollutant for which the water body is already impaired?**

**FEIR Conclusion: Less than Significant.** The FEIR (page 3.7-15) identified that the San Marcos Creek is listed on the CWA Section 303(d) List for benthic community effects, benthic-macroinvertebrate bioassessments, DDE, phosphorus, selenium, total dissolved solids, turbidity and sediment. In addition, Lake San Marcos is impaired for ammonia as nitrogen, foam/scum/oil slicks, nutrients, total dissolved solids, and phosphorus. To avoid potential construction-related impacts to sensitive areas, a site-specific SWPPP would be implemented during construction of the project. Implementation of the SWPPP and appropriate BMPs would reduce construction-related runoff from any riparian areas to prevent potential contamination. Similarly, the 2022 FEIR Addendum (page 61) identified less than significant impacts for this issue area.

**Discussion of the Proposed Project:** The proposed CubeSmart project would still incorporate BMPs and preparation of a SWPPP and landscape features to desilt and/or filter runoff before outlet into San Marcos Creek and Lake San Marcos. As discussed above, the CubeSmart project's SWQMP includes source control, site design and structural BMPs, including biofiltration systems, that would reduce potential water quality impacts to below a level of significance. Implementation of these features would ensure that the proposed CubeSmart development would not

result in an increase in pollutant discharges to receiving waters. Therefore, no new impacts are identified for this issue area.

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any hydrology/water quality impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

The conclusions in the FEIR and 2022 FEIR Addendum are still applicable to the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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- k) **Be tributary to environmentally sensitive areas (e.g., MSCP, RARE, Areas of Special Biological Significance, etc.)? If so, can it exacerbate already existing sensitive conditions?**

**FEIR Conclusion: Less than Significant.** As noted in the FEIR (page 3.7-15), San Marcos Creek is located to the northwest of the project area. Under existing conditions surface runoff from the planning area discharges into San Marcos Creek either by sheet flow or through minor drainage facilities. To avoid potential construction-related impacts to sensitive areas, a site-specific SWPPP would be implemented during the construction phase of the proposed project. Similarly, the 2022 FEIR Addendum (page 61) identified less than significant impacts for this issue area.

**Discussion of the Proposed Project:** Development under the proposed CubeSmart project would still have the potential to impact water quality; however, development under the proposed project would be required to comply with the City's BMP Design Manual (City of San Marcos 2023). A site specific SWPPP would be implemented, and the CubeSmart project would be in conformance with the latest construction general permit to minimize impacts during construction.

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any hydrology/water quality impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, no new impacts are identified for this issue area. The conclusions in the FEIR and 2022 FEIR Addendum are still applicable to the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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I) **Have a potentially significant environmental impact on surface water quality, to either marine, fresh or wetland waters?**

***FEIR Conclusion: Less than Significant.*** The FEIR (Page 3.7-16) concluded that that upon development and ultimate build-out of the project the site would continue to discharge into San Marcos Creek and Lake San Marcos. The implementation of the SWPPP and applicable BMPs to prevent contaminants from entering storm drains to minimize the amount of uncontrolled runoff to surface waters will prevent potential impact to marine, fresh or wetland waters. The Initial Study prepared for the UDSP project (Appendix A.2 of the FEIR) determined that all onsite drainage would convey runoff through an appropriately designed drainage system prior to outlet into any marine, fresh water or wetland waters, per the requirements of existing regulations and state and local water quality standards.

A SWQMP prepared for the 2022 FEIR Addendum (page 62) identified that runoff generated by the project would convey into a mixed use of proposed biofiltration basins, proposed proprietary biofiltration systems, and proposed underground detention systems. Therefore, the FEIR and 2022 FEIR Addendum concluded that the proposed development would have less than significant impacts to surface water quality, to either marine, fresh or wetland waters.

***Discussion of the Proposed Project:*** As described in the SWQMP, runoff generated by the proposed CubeSmart project would be conveyed via a proposed private storm drain system into two proposed private underground detention systems (UD-1 and UD-2). A flow control/bypass structure downstream of each underground detention system would route the flow into a corresponding proposed private proprietary biofiltration system (PBF-1 & PBF-2). Runoff would then continue downstream via a proposed private storm drain system into an existing box culvert which flows under E. Carmel Street and SR- 78. As discussed above, the CubeSmart project's SWQMP includes source control, site design and structural BMPs, including biofiltration systems, that would reduce potential water quality impacts to below a level of significance.

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any hydrology/water quality impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, no new impacts are identified for this issue area. The conclusions in the FEIR and 2022 FEIR Addendum are still applicable to the proposed project.

***Finding:*** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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## 11. LAND USE AND PLANNING – Would the project:

### a) Physically divide an established community?

**FEIR Conclusion: No Impact.** The Initial Study (FEIR Appendix A.2) determined that the project would not divide an established community because the development either exists or is planned along the majority of the project boundaries. The UDSP project proposed internal circulation networks that will enhance vehicular, bicycle, and pedestrian movement to better connect to offsite areas.

The 2022 Amendment to the UDSP expanded the UDSP planning area to include the addition of two parcels located east of Industrial Street and the railroad tracks. One of these parcels, APN 220-201-90-00, is associated with the proposed CubeSmart project site. Per the 2022 FEIR Addendum, the addition of these parcels would not divide an established community and connectivity between the additional parcels and current UDSP planning area would be maintained (2022 FEIR Addendum page 62). The 2022 FEIR Addendum also included analysis of proposed revisions to the Mobility Element of the General Plan. The 2022 FEIR Addendum did not identify any new impacts related to physically dividing an established community (2022 FEIR Addendum page 63).

**Discussion of the Proposed Project:** Development under the proposed CubeSmart project would occur within the footprint analyzed in the 2022 FEIR Addendum. The CubeSmart site is currently zoned Specific Plan Area and is associated with the UDSP. The project includes a General Plan Amendment, a Specific Plan Amendment to the UDSP, a Specific Plan Amendment to the HOCSP, a Zoning Text Amendment, and Conditional Use Permit to allow for construction of a self-storage facility and to increase the boundary of the UDSP planning area to add in two parcels associated with the existing Hampton Inn at 123 E. Carmel Street.

Construction of the CubeSmart project would not physically divide an established community. The Hampton Inn site is already developed, and no redevelopment or operational changes are proposed. Removing the Hampton Inn parcels from the HOCSP and bringing them into the UDSP would not physically divide an established community.

Therefore, no new impacts are identified for this issue area. The previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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### 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?

**FEIR Conclusion: Less than Significant.** The FEIR prepared for the UDSP did not identify any conflicts with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project adopted for the purposes of avoiding or mitigating an environmental effect (page 3.8-21).



The 2022 Amendment to the UDSP expanded the UDSP planning area to include the addition of two parcels located east of Industrial Street and the railroad tracks. One of these parcels, APN 220-201-90-00, is associated with the proposed CubeSmart project site. The 2022 FEIR Addendum included analysis of a General Plan Amendment, a Specific Plan Amendment to the UDSP, a Specific Plan Amendment to the Heart of the City Specific Plan, a Site Development Plan and a Tentative Subdivision Map. Table 1.A of the 2022 amended UDSP included a detailed analysis of the project's consistency with the City's General Plan. As shown in that table, the proposed UDSP amendment would not result in any inconsistencies with any of the analyzed goals and policies. These proposed discretionary actions would not cause any other inconsistency with applicable land use plans, policies or regulation of an agency with jurisdiction over the project. Therefore, no new impacts were identified in the 2022 FEIR Addendum (page 63).

***Discussion of the Proposed Project:*** The proposed CubeSmart project would construct a new self-storage facility at 337 E. Carmel Street to replace the existing CubeSmart facility that is currently located at 235 E. Carmel.

A self-storage facility is not currently an allowable use within the Office/Commercial District of the UDSP, nor would a new self-storage facility be allowed at the proposed location per Section 20.400.180 (Self-Storage) of the San Marcos Municipal Code. Currently, Section 20.400.180 does not allow new self-storage within an SPA zone nor does it allow new self-storage within the SR-78 view corridor.

As described in Section 2.4, the proposed project includes a Specific Plan Amendment to the UDSP (Appendix A1) to create a Self-Storage Overlay Zone within the UDSP. A Zoning Text Amendment (Appendix A3) is also proposed to allow self-storage within the newly created UDSP Self-Storage Overlay Zone. With approval of the Specific Plan Amendment, Zoning Text Amendment, and Conditional Use Permit, the proposed project would be consistent with the applicable plans and policies. This Addendum has analyzed these proposed amendments, and the proposed self-storage use and concluded that the proposed CubeSmart project would not result in any new impacts or any increase in severity of impacts beyond what was already analyzed in the previous FEIR and 2022 FEIR Addendum.

The project also proposes a General Plan Amendment, and amendments to the UDSP and HOCSP associated with the Hampton Inn parcels. The Hampton Inn parcels are fully developed, and no redevelopment of the existing 3-story Hampton Inn parcels are proposed. The Hampton Inn parcels would be assigned a Mixed-Use Building A/Commercial Building use within the UDSP with a building height of 3 stories (30-foot minimum) to 5 stories (70-foot maximum). This Addendum has analyzed these proposed amendments and concluded that the proposed project would not result in any new impacts or any increase in severity of impacts beyond what was already analyzed in the previous FEIR and 2022 FEIR Addendum. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, no new impacts are identified for this issue area. The previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

***Finding:*** There are no significant impacts for this issue area and no changes in information that would require preparation of an EIR.

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## 12. 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?**

***FEIR Conclusion: No Impact.*** The FEIR (page 5-4) noted that according to the City’s General Plan, the State’s Mineral Land Classification Maps identifies the City as unsuitable as a source of sand and gravel resources. This would apply to the additional parcels analyzed in the 2022 FEIR Addendum, which include the proposed CubeSmart project site (2022 FEIR Addendum page 63).

***Discussion of the Proposed Project:*** Development of the proposed CubeSmart project would occur within the footprint analyzed in the 2022 FEIR Addendum. As noted in the FEIR, the State’s Mineral Land Classification Maps identifies the City as unsuitable as a source of sand and gravel resources. Because the project area is not identified as an area with known valuable mineral resources, no new impacts are identified.

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any mineral resources impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

The previous FEIR and 2022 FEIR Addendum conclusions are still applicable to the proposed project.

***Finding:*** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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- 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?**

***FEIR Conclusion: No Impact.*** The FEIR (page 5-4) noted that according to the City’s General Plan, the State’s Mineral Land Classification Maps identifies the City as unsuitable as a source of sand and gravel resources. This would apply to the additional parcels analyzed in the 2022 FEIR Addendum, which include the proposed CubeSmart project site (2022 FEIR Addendum page 64).

***Discussion of the Proposed Project:*** Development of the proposed CubeSmart project would occur within the footprint analyzed in the 2022 FEIR Addendum. As noted in the FEIR, the State’s Mineral Land Classification Maps identifies the City as unsuitable as a source of sand and gravel resources. Because the project area is not identified as a locally important mineral recovery site delineated on a local general plan, specific plan or other land use plan, no new impacts are identified.

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any mineral resources impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment

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of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, no new impacts are identified, and the previous FEIR and 2022 FEIR Addendum conclusions are still applicable to the proposed project.

***Finding:*** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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### 13. NOISE – Would the project:

- a) **Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

***FEIR Conclusion: Mitigated to Below a Level of Significance.*** The FEIR (page 3.9-12) prepared for the UDSP and the 2022 FEIR Addendum (page 65) identified the potential for noise impacts related to the placement of residential and commercial uses in proximity to each other as part of a mixed-use project. Mitigation measures were identified (N-4 and N-5) to reduce the impacts to below a level of significance. These measures require site-specific noise studies at the time future development is proposed and mitigation to reduce exterior and interior noise levels to meet City standards.

**N-4** As development proposals come forward within the Specific Plan area, a site specific noise study(s) shall be prepared for each development. The noise study shall analyze the impact of co-locating residential and commercial uses on the project site, as well as locating uses within proximity to SR-78. Mitigation measures shall be identified from among those identified herein or other feasible mitigation measures and incorporated into the Conditional Use Permits or other discretionary permits, to reduce noise impacts associated with these uses. These measures could include sound barriers/walls, noise-reducing pavement, or other mitigation measures to provide sound level reductions so that they are consistent with the CNEL levels identified in the San Marcos General Plan, including 45 dBA CNEL for interior residential areas.

**N-5** All proposed sensitive land uses would be subject to compliance with CCR Title 24 interior noise abatement threshold, inclusive of the residential areas, professional and medical areas, and schools. Residential areas shall be interior mitigated to 45 dBA CNEL. Professional spaces and school uses shall be interior mitigated to 50 dBA CNEL.

***Discussion of the Proposed Project:*** The development under the proposed CubeSmart project would be similar to the uses analyzed in the FEIR and 2022 FEIR Addendum, and the same potential for noise conflicts at the interface of commercial and residential uses exists. In compliance with the FEIR Mitigation measure N-4, a project-specific noise study for the proposed CubeSmart project was prepared by LDN Consulting (2025b) to identify and provide mitigation for any noise impacts to City standards. The analysis is included in Appendix H of this document and summarized below.

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## **Construction**

Based upon LDN's analysis, the closest sensitive uses would be the future residences to be constructed immediately to the south as part of the future Carmel Enterprise affordable housing project. The construction equipment would be spread out over the project site from distances near the occupied property to distances of over 100-feet away. Additionally, the project site is depressed below the future residential property to the south and the slope would help reduce the noise levels further. At average distances over 75-feet, the construction activities would be expected to comply with the City's 75 dBA Leq 8-hour standard at the future residential land uses to the south and no construction noise impacts are anticipated. Additionally, no offsite construction is proposed (LDN 2025b).

## **Transportation Noise Levels**

To determine the future noise environment, the roadway segment noise levels were calculated using the methods in the Highway Noise Model published by the Federal Highway Administration. The FHWA Model uses the traffic volume, vehicle mix, speed, and roadway geometry to compute the equivalent noise level. The peak hour traffic volumes range between 6-12% of the average daily traffic (ADT) and 10% is generally acceptable for noise modeling.

Roadway parameters used in the analysis include the peak traffic volumes, vehicle speeds and the hourly traffic flow distribution (vehicle mix). The vehicle mix provides the hourly distribution percentages of automobiles, medium trucks and heavy trucks for input into the FHWA Model. The vehicle mix for SR-78 was obtained from the latest Caltrans Truck Traffic report. The Buildout conditions for SR-78 were calculated from lane capacity guidelines by Caltrans of 2,100 peak vehicles per hour. Future year 2035 traffic along E Carmel Street is expected to have 3,300 average daily trips (ADT) according to the SANDAG Traffic Prediction Model for the year 2035. The speed limit along E Carmel Street is 35 miles per hour.

Based on the exterior noise model for the roadway the worst-case exterior noise level is 77.6 dBA CNEL at the proposed office located at the northeast corner of the CubeSmart building. The model does not take into account any additional noise reductions for existing or proposed structures, barriers or topographic features.

## **Interior Noise Levels**

The methodology used to determine the resultant interior noise levels is based upon the exterior noise level minus the sound transmission loss as identified in the American Society of Testing and Materials (ASTM) guidelines: E413 & E90. Standard building construction will provide a noise reduction of approximately 15 dBA with a windows open condition and a minimum 20 dBA noise reduction with the windows closed. The exterior noise levels at the proposed office calculated in terms of dBA are converted to the six-octave band sound pressure levels between: 125 - 4000 Hertz.

Acoustical modeling of the proposed office was performed in accordance with the above guidelines and included combining the transmission loss for each of the building components that will reduce the interior noise levels. Building components typically include the windows, exterior doors, and exterior walls. The total noise reduction is dependent upon the transmission loss of each building component, their

subsequent surface area, quality of the building/construction materials, a building façade and angle correction.

The interior noise reduction calculations were performed using LDN's interior noise model. The model converts the exterior sound level to octave band frequencies and accounts for the transmission loss, correction factors and room absorption. The floor plans used for this analysis were provided by the project architect.

The exterior noise levels were determined to be as high as 77.6 dBA CNEL at the building facade. Basic calculations show that a windows open condition will typically reduce the interior noise levels 12-15 dBA CNEL and not provide adequate interior noise mitigation. To meet the 50 dBA CNEL interior noise standard, an overall minimum interior noise level reduction of 27.6 dBA CNEL is needed for the proposed project. Therefore, a closed window condition is required to reduce interior noise levels to comply with CCR Title 24 and City of San Marcos requirements. The windows/doors closed condition does not require the windows or doors to be non-operable but does require that mechanical ventilation be installed, which is proposed, to move air within the structure and control temperatures when the windows are closed. The mechanical ventilation must meet the jurisdictional requirements for the office space. It was determined that an STC rating of 30 will be sufficient for all glass assemblies to reduce the interior noise levels below 50 dBA CNEL. The proposed CubeSmart project meets these requirements and no impacts are identified.

### **Operations**

The operations of the proposed CubeSmart self-storage facility would occur during the daytime and overnight hours. To be conservative, the most restrictive overnight noise thresholds of 55 dBA Leq were applied.

Based on similar operational uses for self-storage facilities, on-site operational noise sources for this proposed project are anticipated to include vehicle movements to bring or remove storage items. To be conservative, it was assumed that a moving truck that is equipped with a backup beeper and would create the loudest noise level would be used daily. Additionally, rooftop HVAC units would be required to provide climate control for the office and storage units. HVAC unit locations were provided by the project architect for use in the noise modeling.

The noise levels for each source along with the calculated hourly noise levels based upon individual operating times are shown below in Table 1 for the southern multi-family residential property line. The eastern property line, zoned commercial, is located farther from the operational activities. The proposed HVAC units would be shielded by a metal screen that would provide a minimum 5 dBA noise reduction for a reference noise level of 62 dBA at 3 feet. The combined noise levels at the southern property line based upon distance separation, shielding, and limited duty-cycles were projected to be below the City's 55 dBA noise threshold. Therefore, no operational noise impacts are anticipated, and no mitigation is required.

**Table 1: Operational Noise Levels (Southern Property Line)**

Source	Reference Noise Level (dBA)	Reference Distance (Feet)	Quantity	Distance to Nearest Property Line (Feet)	Noise Reduction Due to Distance DBA	Resultant Cumulative Noise Levels (dBA Leq)
Moving Trucks	68.2	4	1	25	-15.9	52
3-ton HVAC	62.0	3	14	116	-31.7	42
Cumulative Noise Level @ Property Line (dBA)						53
Property Line Standard						55
Complies with Chapter 20.300						Yes

In summary, the CubeSmart would not result in a new significant noise impact or an increase in severity of noise impacts.

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any noise impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, no new impacts are identified for this issue area. The previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

**b) Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?**

**FEIR Conclusion: Mitigated to Below a Level of Significance.** The FEIR (page 3.9-10) identified potential construction-related vibration impacts due to proposed blasting. Mitigation was identified (N-3) to reduce the impact. The mitigation measure required a distance separation between blasting activities and nearby sensitive receptors. The 2022 FEIR Addendum noted that construction related vibration impacts would be similar to those identified in the FEIR (2022 FEIR Addendum page 66).

**Discussion of the Proposed Project:** The noise analysis prepared for the proposed CubeSmart project included an analysis of vibration levels from construction (Appendix H). Based upon LDN's analysis, the closest vibration sensitive uses would be the future residences to be constructed immediately to the south as part of the future Carmel Enterprise affordable housing project. These residences would be located an average of 75 feet or more from the center of proposed construction. According to the analysis, construction activities would not result in vibration induced

structural damage to residential buildings near the construction areas. Additionally, construction activities would not generate levels of vibration that would exceed the Federal Transit Administration (FTA) criteria for nuisance for nearby residential uses. Therefore, vibration impacts would be less than significant. Blasting is not anticipated to be required for construction on the CubeSmart site, but should it be determined that blasting is needed then mitigation measure N-3 from the FEIR would still apply and would reduce impacts to less than significant.

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any noise impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, no new impacts are identified for this issue area. The previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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- c) **For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**

**FEIR Conclusion: Less than Significant.** The FEIR (page 3.9-13) identified that the closest public airport to the project area is McClellan-Palomar Airport, located approximately 5.5 miles west of the project site. According to the Airport Land Use Compatibility Plan (ALUCP) for the McClellan-Palomar Airport, the proposed project site is not located within the 60 dB CNEL noise contour of the airport; therefore, impacts related to airport noise are considered less than significant.

The 2022 FEIR Addendum concluded that the addition of two parcels to the UDSP planning area (APN 220-201-90-00 and APN 220-202-18-00) would also be adequate distance from operating airports to avoid any type of noise impact from operating aircraft (2022 FEIR Addendum page 67).

**Discussion of the Proposed Project:** The UDSP planning area is in the same location and remains at an adequate distance from any operating airport to avoid any type of noise impact from operating aircraft at the proposed CubeSmart site. Please see section 9.e, above, for information on the City's coordination with the San Diego County Regional Airport Authority (SDCRAA) Airport Land Use Commission (ALUC).

The Hampton Inn parcels are fully developed with a three-story hotel and associated parking. No redevelopment of the Hampton Inn site is proposed as part of the proposed project. The Hampton Inn is located at an adequate distance from operating airports to avoid any type of noise impacts from operating aircraft. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, the conclusions in the FEIR and 2022 FEIR Addendum are still applicable to the proposed project and no new impacts are identified.

*Finding:* There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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#### 14. POPULATION AND HOUSING – Would the project:

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

*FEIR Conclusion: Less than Significant.* The FEIR (page 3.10-5) concluded that the UDSP would increase population with the addition of 2,600 mixed-use residential units and 800 student housing units (3,400 units total) and would create additional infrastructure; however, impacts were determined to be less than significant.

The 2022 Amendment to the UDSP expanded the UDSP planning area but reduced the overall intensity of development. The total number of residential units (3,400) remained unchanged. Per the 2022 FEIR Addendum, no new impacts would occur related to unplanned population growth (page 67).

*Discussion of the Proposed Project:* Development under the proposed CubeSmart project would occur within the footprint analyzed in the 2022 FEIR Addendum. The project includes a Specific Plan Amendment to the UDSP, a Zoning Text Amendment, and Conditional Use Permit to allow for construction of a self-storage facility. Construction of this facility would not directly or indirectly induce substantial unplanned population growth.

The Hampton Inn parcels are fully developed with a three-story hotel and associated parking. No redevelopment of the Hampton Inn site is proposed as part of the proposed project. The changes associated with removing the Hampton Inn parcels from the HOCSP and moving it into the UDSP would not directly or indirectly induce substantial unplanned population growth. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, the previous FEIR and 2022 FEIR Addendum conclusions are still applicable to the proposed project and no new impacts are identified.

*Finding:* There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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- b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

*FEIR Conclusion: Less than Significant.* The FEIR (page 3.10-5) noted that the existing residents could stay in their current locations until parcels are acquired by the developer. Until that time, none of the residences within the UDSP area would be required to be vacated. Full build-out of the UDSP would require approximately 75 existing residences to be removed. The FEIR concluded this was a less than significant impact since 2,600 residential units would be constructed on the site.

The 2022 Amendment to the UDSP expanded the UDSP planning area but would not result in any additional loss of residences not already considered in the UDSP FEIR. Additionally, removal of the Johnston Lane SR-78 flyover bridge would avoid the need

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to impact residences on Johnston Lane. Therefore, per the 2022 FEIR Addendum, no new impacts would occur related to displacement of people or housing (2022 FEIR Addendum page 67).

**Discussion of the Proposed Project:** Development under the proposed CubeSmart project would occur within the footprint analyzed in the 2022 FEIR Addendum. The CubeSmart site is vacant and was recently graded, and stormwater runoff transmission and containment structures were constructed. Therefore, no impacts related to displacement of people or housing would occur.

The Hampton Inn parcels are fully developed with a three-story hotel and associated parking. No redevelopment of the Hampton Inn site is proposed as part of the proposed project. No impacts related to the displacement of people or housing would occur. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

The previous FEIR and 2022 FEIR Addendum conclusions are still applicable to the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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## 15. 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 of the public services:**

- i) **Fire protection?**

**FEIR Conclusion: Less than Significant.** The FEIR (page 3.11-8) concluded that the UDSP project would result in an increase in demand for the San Marcos Fire Department (SMFD) due to the addition of residents and businesses. The FEIR concluded that SMFD would be capable of handling an increase in services. Any incremental effects would be offset by the City requirement for payment of fees in CFD 98-01 for fire protection to make the impact less than significant.

The 2022 Amendment to the UDSP expanded the UDSP planning area and modified building development standards to allow for greater building heights in some areas of the UDSP (up to 12, 15, and 16 stories compared to 7 stories). Per the 2022 FEIR Addendum (page 68), no new impacts would occur related to fire protection.

**Discussion of the Proposed Project:**

Development under the proposed CubeSmart project would occur within the footprint analyzed in the 2022 FEIR Addendum. The project includes a Specific Plan Amendment to the UDSP, a Zoning Text Amendment, and Conditional Use Permit to allow for construction of a self-storage facility. The CubeSmart project site is undeveloped.

The SMFD has reviewed the CubeSmart project and did not identify any significant impacts associated with servicing the project. Additionally, as noted in the FEIR, future development would pay fees into a CFD to offset the increase in demand. The project would annex into CFD 2001-01 (Fire) to offset the increase in demand. This CFD is used to finance authorized fire facilities and equipment (fire stations, training facilities, dispatch center, communications systems and equipment) and services (fire protection, ambulance and paramedic). The proposed CubeSmart project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, a 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 fire protection.

The Hampton Inn parcels are fully developed and are currently served by SMFD. No redevelopment or operational changes are proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any public services impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, the previous FEIR and 2022 FEIR Addendum conclusions are still applicable to the proposed project and no new impacts are identified.

***Finding:*** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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ii) **Police protection?**

***FEIR Conclusion: Less than Significant.*** The FEIR (page 3.11-9) identified that the UDSP project would result in an increase in demand to police protective services from the San Diego County Sheriff's Department due to the increase in area residents and businesses. Any incremental effects of the proposed project's demand on police protection were determined to be offset by the City requirement for the payment of fees to CFD 98-01 for police protection to make the impact less than significant.

The 2022 Amendment to the UDSP expanded the UDSP planning area but decreased the intensity of development within the UDSP, thus resulting in a reduction in demand for police protection services compared to the currently approved UDSP. Per the 2022 FEIR Addendum (page 69), no new impacts would occur related to fire protection.

***Discussion of the Proposed Project:*** Development under the proposed CubeSmart project would occur within the footprint analyzed in the 2022 FEIR Addendum. The project site was recently graded, and stormwater runoff transmission and containment structures were constructed. The project site is currently zoned for Freeway Commercial Building A. The CubeSmart project includes a Specific Plan Amendment to the UDSP, a Zoning Text Amendment, and Conditional Use Permit to allow for construction of a self-storage facility. The project design incorporates an access gate to the self-storage buildings, as well as a combination of a masonry wall and steel tube fencing. Additionally, as noted in the FEIR, future development would pay fees into CFD 98-01 (Improvement

Area 1) to offset the increase in demand. This CFD funds police services as well as police facilities, communication systems and equipment.

The proposed CubeSmart project would not result in any new impacts related to police protection services and would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, a 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 police protection.

The Hampton Inn parcels are fully developed and are currently served by San Diego County Sheriff's Department. No redevelopment or operational changes are proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any public services impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, the previous FEIR and 2022 FEIR Addendum conclusions are still applicable to the proposed project and no new impacts are identified.

***Finding:*** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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### iii) Schools?

***FEIR Conclusion: Less than Significant.*** The FEIR (page 3.11-10) identified that the UDSP project would generate 1,167 students which would need to be served by the San Marcos Unified School District (SMUSD). To offset the additional facilities and services that will be needed to accommodate these students, future development would be required to pay SMUSD Level II Statutory School Fees at the time the building permit is obtained. The plan also included an 8-acre site for an elementary school. Impacts were determined to be less than significant.

The 2022 Amendment to the UDSP expanded the UDSP planning area but maintained the same number of residential units. Also, the proposed project retained the option for SMUSD to construct a K-6 elementary school within the UDSP. Per the 2022 FEIR Addendum, since certification of the FEIR, SMUSD has refined their student generation numbers providing different generation rates for single-family detached, single family attached and multi-family units compared to the single generation rate that was used at the time the FEIR was prepared. Using current SMUSD generation rates, the UDSP is now anticipated to generate 843 students. This is a reduction of 324 students compared to what was anticipated in the FEIR analysis. No new impacts were identified related to schools (2022 FEIR Addendum pages 69-71).

***Discussion of the Proposed Project:*** The project includes a Specific Plan Amendment to the UDSP, a Zoning Text Amendment, and Conditional Use Permit to allow for construction of a self-storage facility. No residential uses are proposed. New commercial development under the proposed CubeSmart project would still be required to pay the applicable Level II Statutory Schools fees in

effect at the time of building permit which would offset the demand for school services and is considered complete and full mitigation. Pursuant to Education Code Section 17620 et seq. and Government Code sections 65995(h) and 65996(b) (SB 50), the payment of statutorily capped fee amounts provides “full and complete mitigation of the impacts of any legislative or adjudicative act...on the provision of adequate school facilities.”

The proposed CubeSmart project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service for school services.

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. . Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any public services impacts, including those related to schools would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, the previous FEIR and 2022 FEIR Addendum conclusions are still applicable to the proposed project and no new impacts are identified.

***Finding:*** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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#### iv) Parks?

***FEIR Conclusion: Less than Significant.*** The FEIR (page 3.12-9) identified that the UDSP would construct 17.37 acres of park space, 7.96 acres of plazas and paseos, and 1.38 acres of trails. Even with the additional park space and trails proposed under the UDSP, impacts would occur to recreational facilities and parks due to the additional 10,500 residents that the UDSP would add to the City’s population. This would result in a deficiency in park space. The FEIR concluded that this deficiency would be offset through the payment of fees as required by City Ordinance 88-799 (Municipal Code, Chapter 20.12, Growth Management). Park, plaza, paseo and trail acreage were modified via a 2014 SPA.

The 2022 Amendment to the UDSP expanded the UDSP planning area but maintained the same number of residential units. Per the 2022 FEIR Addendum (page 71), the proposed revisions to the UDSP would not increase demand on park facilities and would increase the amount of park and urban open space by approximately two acres.

***Discussion of the Proposed Project:*** Development under the proposed CubeSmart project would not result in additional residents to the area, nor would it put an increased demand on park facilities or result in the construction of new park facilities. Per the FEIR, future development would contribute toward the City’s existing deficiency in park space through the payment of fees as required by City Ordinance 88-799 (Municipal Code, Chapter 20.12, Growth Management).

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any public services impacts, including impacts to parks, would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, the previous FEIR and 2022 FEIR Addendum conclusions are still applicable to the proposed project and no new impacts are identified.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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**v) Other public facilities?**

**FEIR Conclusion: Less than Significant.** The FEIR (page 3.11-10) identified that the UDSP would result in additional residents that would increase demands on library services and resources, although additional library services were identified through the California State University San Marcos and Palomar College campuses. The additional library facilities would reduce impacts to a level of less than significant impact.

**Discussion of the Proposed Project:** The proposed CubeSmart project does not include residential development, thus it would not increase demand for library services.

The Hampton Inn parcels are fully developed, and no redevelopment of the Hampton Inn site is proposed as part of the proposed project. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any public services impacts, including impacts to libraries, would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, the previous FEIR and 2022 FEIR Addendum conclusions are still applicable to the proposed project and no new impacts are identified.

**Finding:** No new impacts for this issue area and no changes in information that would require preparation of an EIR.

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**16. 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?**

**FEIR Conclusion: No Impact.** The UDSP project proposes the construction of 17.37 acres of park space, 7.96 acres of plazas and paseos, and 1.38 acres of trails. The FEIR (page 3.12-9) identified impacts to recreational facilities and parks even with the additional park space and trails due to the additional 10,500 residents that the UDSP would add to the City population, which would result in a deficiency in park space. This deficiency would be made up through the payment of fees as required

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by City Ordinance 88-799 (Municipal Code, Chapter 20.12, Growth Management) as part of the project design for future development of parks and recreation. Park, plaza, paseo and trail acreage were modified via a 2014 SPA. The 2022 Amendment increased the amount of park space by two acres.

**Discussion of the Proposed Project:** Development under the proposed CubeSmart project would not result in additional residential units to the planning area beyond what was already considered in the FEIR. The proposed self-storage use would not result in an increase in use of existing neighborhood or regional parks or other recreation facilities so that substantial physical deterioration would occur. No new impacts would be realized from the proposed CubeSmart project.

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any recreation impacts would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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- b) **Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?**

**No Impact.** Please refer to Section 16.a above.

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## 17. TRANSPORTATION– Would the project:

- a) **Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?**

**FEIR Conclusion: Significant and Unmitigated.** The FEIR analyzed trip generation from the following land uses: mixed use multi-family residential, mixed use community commercial, mixed use office, mixed use medical office, hotel, community center, and elementary school, in addition to construction-related traffic over a 20-year time period for future development. The FEIR (page 3.13-64 through 3.13-67) concluded that the project would not impact roadway segments for the Year 2015-time frame. Impacts would be considered less than significant for the 2020-time frame with the completion of the SR-78 flyover at Westlake Drive bridge, and impacts would be significant and unmitigated for SR-78 ramps for the 2030 timeframe scenario. Mitigation measure TR-1 of the FEIR noted that, based upon the focused traffic studies demonstrating compliance with the performance criteria set forth therein, the City Manager may modify the transportation phasing plan for the Specific Plan area. The FEIR identified a traffic phasing plan on a yearly basis, with specific improvements to be constructed by Years 2015, 2020, and 2030.

In the 2014 FEIR Addendum prepared for an amendment to the UDSP, a new traffic study was prepared and identified a traffic mitigation phasing plan that required improvements based upon peak hour trip generation for development within the

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UDSP project area instead of a specific year trigger. This was deemed a more realistic mitigation phasing approach since development had not occurred at the rate originally anticipated in the FEIR.

The 2022 UDSP Amendment included the addition of two additional parcels, including the proposed CubeSmart project site and, decreased the overall intensity of development within the UDSP planning area.

Trip generation considered under the 2022 UDSP amendment, 2009 FEIR, and 2014 UDSP FEIR Addendum is summarized in **Table 2**. As shown in Table 2, the 2022 UDSP amendment results in a 49% reduction in trips compared to what was analyzed in the FEIR and a 37% reduction compared to 2014 Addendum for the previously approved UDSP consistent with the reduction in development yield. In conclusion, there were no new impacts identified for this issue area and no increase in severity of impacts (2022 FEIR Addendum pages 73-80).

**Table 2. Trip Generation in the UDSP**

	Total ADT	AM Peak ADT		PM Peak ADT	
<b>2009 FEIR</b>	114,697	6,970		11,749	
<b>2014 FEIR Addendum (Current UDSP)</b>	92,889	5,970		9,511	
<b>2022 LTA</b>	58,517	4,691	2,877 In 1,814 Out	7,728	3,297 In 4,449 Out

**Discussion of the Proposed Project:** The proposed CubeSmart project would decrease the overall intensity of development for the project site compared to what could be developed under the Office/Commercial District designation (up to six stories of mixed use or freeway commercial uses) and what was analyzed in the UDSP FEIR and Addenda.

Additionally, the proposed CubeSmart project is a relocation of the existing CubeSmart self-storage facility. The existing CubeSmart self-storage facility is 78,000 s.f. and is located at 235 E. Carmel Street, approximately 0.25 miles west of the project site.

Per the traffic memorandum (Urban Systems 2025) prepared for the proposed project and included as Appendix I, the self-storage use is a low traffic generator. Based on SANDAG traffic generation rates, the proposed project would generate two trips per 1,000 s.f. of rentable space (SANDAG 2002). The proposed project includes 88,350 s.f. of rentable space, resulting in 176 average daily trips (ADT). The existing CubeSmart facility is slightly smaller and generates approximately 156 ADT. Thus, there is a 20 ADT net change between the existing CubeSmart and the proposed CubeSmart. The addition of 20 ADT from the proposed use does not trigger new traffic impacts. The traffic generation memorandum also confirmed that offsite transportation improvements identified in the FEIR and addenda have been constructed, assured, or deemed not necessary and the proposed project does not trigger any new improvement requirements. Therefore, no new impacts are identified for this issue area.

**Hampton Inn**

The existing 69-room Hampton Inn was originally developed under the HOCSP but would be moved into the Block 1 area of the UDSP as part of the proposed project. This change merely transfers trips to the UDSP which was already analyzed under a different plan, the HOCSP. The existing traffic from the Hampton Inn was part of the background existing conditions and taken into account as part of the transportation analysis completed for the UDSP. Even if the 690 trips from the existing hotel were added to the total UDSP trips, it would increase the total to 54,040 ADT which still falls well under what was assumed in the 2022 University District Local Transportation Analysis (LTA) (Urban Systems 2022).

By removing the Hampton Inn site from the HOCSP, the land use description also changes. In the HOCSP the site is identified as Business Park. For the UDSP the Hampton Inn site will become part of the commercial retail core and could be developed as a Mixed-Use Building A or Commercial Building. However, no redevelopment of the Hampton Inn parcel is proposed.

The new larger Block 1 of the UDSP, which would include the Hampton Inn site, would also will include a market along with office and commercial uses. Attachment C of the traffic memorandum (Appendix I of this document) provided an updated traffic generation table for Block 1. The 2022 University District LTA assumed a trip generation of 10,680 ADT for Block 1. With the addition of the Hampton Inn to Block 1 and a refinement of proposed future development in Block 1, at total of 3,580 ADT are forecasted for Block 1. This represents a 66% reduction in trips compared to what was identified for Block 1 and approved under the 2022 UDSP Addendum.

All traffic from the Hampton Inn site has previously been considered as a part of existing traffic in the previous UDSP update. Therefore, no new impacts are expected as a result of the boundary change or land use change on Block 1. The change in land use for Block 1 represents a significant reduction in traffic generation

The previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

***Finding:*** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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**b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?**

***FEIR Conclusion: Not Analyzed.*** Section 15064.3(b) of the CEQA Guidelines provide criteria for analyzing transportation impacts. At the time the FEIR was certified, CEQA Guidelines Section 15064.3 was not in effect.

A Vehicle Miles Traveled (VMT) analysis was prepared for the 2022 UDSP Amendment which included adding two additional parcels, including the proposed CubeSmart project site, to the UDSP planning area. The VMT analysis concluded that the VMT impact would be less than significant for both resident and employee VMT (2022 FEIR Addendum, page 82).

***Discussion of the Proposed Project:*** As noted in the City's Traffic Impact Guidelines Section 2.1.2, certain types of projects that meet exemption criteria would be considered to have a less than significant VMT impact. The project meets the exemption criteria in two categories.



The first is that the proposed CubeSmart project would be characterized as a Small Project as it is consistent with the General Plan and also generates fewer than 110 new net daily vehicle trips. The proposed CubeSmart project will generate 176 trips, but replaces a facility with an existing trip rate of 156. Therefore, the proposed project results in a net increase of 20 trips when the relocation of the existing CubeSmart facility at 235 E. Carmel is considered.

Secondly, the proposed CubeSmart project also screens out via the Adjacency to High-Quality Transit category. The project has a floor area ratio of 0.85, which meets the requirement of being greater than 0.75. The proposed CubeSmart project does not provide parking beyond minimum Municipal Code requirements, is consistent with the General Plan and does not reduce existing affordable housing. Therefore, the CubeSmart project is considered to have a less than significant VMT impact.

The Hampton Inn parcels are already developed with existing trips associated with the hotel development. No redevelopment or operational changes are proposed; therefore, no new trips would occur by moving the Hampton Inn parcels from the HOCSP to the UDSP, and a VMT analysis would not be required. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

***Finding:*** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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c) **Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

***FEIR Conclusion: Less than Significant.*** Neither the Initial Study for the FEIR (Appendix A.2 of the FEIR) nor the 2022 FEIR Addendum (pages 83-84) identified any hazards related to design features or incompatible uses. Impacts were determined to be less than significant.

***Discussion of the Proposed Project:*** The CubeSmart project does not propose any incompatible uses that could result in hazards. The traffic memorandum prepared for the proposed project (Appendix I) noted that the project access drive is located along a straight section of E. Carmel Street and the site provides a two-way circular drive to access both sides of the two buildings. The project also includes 12 required parking spaces. Urban Systems did not identify any potential hazards related to site design or access (Urban Systems 2025). Therefore, no new impacts are identified for this issue area.

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any design hazards would have been analyzed and mitigated under that project-specific CEQA document. Bringing the Hampton Inn parcels into the UDSP does not result in any changes associated with hazards due to design or incompatible use. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

The previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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**d) Result in inadequate emergency access?**

**FEIR Conclusion: No Impact.** The Initial Study of the FEIR (Appendix A.2 of the FEIR) did not identify any impacts related to emergency access. Similarly, the 2022 FEIR Addendum (page 84) noted that parking and circulation plans have been designed to accommodate emergency response vehicles. Also, the Fire Marshal has reviewed the proposed SDP for Phases 1 and 2 and has not indicated any issues related to emergency access and response.

**Discussion of the Proposed Project:** Development under the proposed CubeSmart project would occur within the footprint analyzed in the 2022 FEIR Addendum. No roadway improvements or changes are proposed. As noted above, Urban Systems did not identify any potential hazards related to site design or access (Urban Systems 2025). Finally, the Fire Marshal has reviewed the proposed CubeSmart project plan and has not indicated any issues related to emergency access and response. Therefore, no new impacts are identified for this issue area.

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any issues related to emergency access would have been analyzed and mitigated under that project-specific CEQA document. Bringing the Hampton Inn parcels into the UDSP does not result in any changes associated with emergency access. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

The previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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**18. TRIBAL CULTURAL RESOURCES – Would the project:**

- a) **Cause a substantial adverse change in the significance of a tribal cultural resources, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historic Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?**
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**FEIR Conclusion: Not Analyzed/ Mitigated to Below a Level of Significance.** The requirement to analyze a project's potential impact to tribal cultural resources became a requirement after certification of the FEIR. The FEIR did analyze potential impacts to cultural resources, and those conclusions are summarized in Section 5 of this document.

The 2022 Amendment to the UDSP expanded the UDSP planning area to include the addition of two parcels located east of Industrial Street and the railroad tracks. One of these parcels, APN 220-201-90-00, is associated with the proposed CubeSmart project site. The 2022 FEIR Addendum concluded that mitigation measures identified for cultural resources would still be applicable under the proposed project. Future development within the UDSP planning area will be required to adhere to mitigation measures CR-1 through CR-4, which address archaeological monitoring requirements during grading. Additionally, any future development that results in grading is subject to the City's standard conditions of approval that require monitoring by an archaeologist and Native American tribal monitor for any grading activities that occur in previously undisturbed areas. These standard conditions have been developed in coordination with local tribes and would reduce potential impacts to below a level of significance.

**Discussion of the Proposed Project:** Development under the proposed CubeSmart project would occur within the footprint analyzed in the 2022 FEIR Addendum. The proposed CubeSmart project site does not support any known archaeological resources. Future development within the UDSP planning area is required to adhere to mitigation measures CR-1 through CR-4, which address archaeological monitoring requirements during grading. Additionally, any development that results in grading is subject to the City's standard conditions of approval that require monitoring by an archaeologist and Native American tribal monitor for any grading activities that occur in previously undisturbed areas. These standard conditions have been developed in coordination with local tribes.

The Hampton Inn parcels are fully developed, and no redevelopment of the Hampton Inn site is proposed as part of the proposed project. Development of the Hampton Inn was analyzed in Negative Declaration #99-527, and any issues related to cultural resources would have been analyzed and mitigated under that project-specific CEQA document; therefore, there is no potential to impact tribal cultural resources. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, no new impacts are identified for this issue area. The previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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- b) **Cause a substantial adverse change in the significance of a tribal cultural resource that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of the Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

***FEIR Conclusion: Not Analyzed/ Mitigated to Below a Level of Significance.*** The requirement to analyze a project’s potential impact to tribal cultural resources became a requirement after certification of the FEIR. The FEIR did analyze potential impacts to cultural resources, and those conclusions are summarized in Section 5 of this document.

The 2022 Amendment to the UDSP expanded the UDSP planning area to include the addition of two parcels located east of Industrial Street and the railroad tracks. One of these parcels, APN 220-201-90-00, is associated with the proposed CubeSmart project site. The 2022 FEIR Addendum (page 41) concluded that mitigation measures identified for cultural resources would still be applicable under the proposed project. Future development within the UDSP planning area will be required to adhere to mitigation measures CR-1 through CR-4, which address archaeological monitoring requirements during grading. Additionally, any future development that results in grading is subject to the City’s standard conditions of approval that require monitoring by an archaeologist and Native American tribal monitor for any grading activities that occur in previously undisturbed areas. These standard conditions have been developed in coordination with local tribes and would reduce potential impacts to below a level of significance. The 2022 FEIR Addendum (page 41) concluded that the project would not result in any increase in potential for impact to tribal cultural resources.

Additionally, the parcels analyzed in the 2022 FEIR Addendum, which include the proposed CubeSmart project site, were not identified as supporting any archaeological resources (2022 FEIR Addendum page 41).

***Discussion of the Proposed Project:*** Development under the proposed CubeSmart project would occur within the footprint analyzed in the 2022 FEIR Addendum. The proposed CubeSmart project site does not support any known archaeological resources. Future development within the UDSP planning area is required to adhere to mitigation measures CR-1 through CR-4, which address archaeological monitoring requirements during grading. Additionally, any development that results in grading is subject to the City’s standard conditions of approval that require monitoring by an archaeologist and Native American tribal monitor for any grading activities that occur in previously undisturbed areas. These standard conditions have been developed in coordination with local tribes. Therefore, no new impacts are identified for this issue area.

The Hampton Inn parcels are fully developed, and no redevelopment of the Hampton Inn site is proposed as part of the proposed project. Development of the Hampton Inn was analyzed in Negative Declaration #99-527, and any issues related to cultural resources would have been analyzed and mitigated under that project-specific CEQA document; therefore, there is no potential to impact tribal cultural resources. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

The previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

***Finding:*** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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## 19. UTILITIES AND SERVICE SYSTEMS – Would the project:

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- a) **Require or result in relocation or the construction of new or expanded water, wastewater treatment facilities, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

***FEIR Conclusion: Mitigated to Below a Level of Significance.*** The FEIR (pages 3.14-8 through 3.14-18) analyzed the potential for the UDSP project to impact water and wastewater infrastructure due to additional residential, student housing, hotel and commercial business development. The FEIR concluded that additional development would increase demands on water and wastewater treatment facilities and require regional infrastructure improvements to accommodate the increases. Mitigation measures US-4 through US-6 were identified in the FEIR to reduce the impact to below a level of significance. These mitigation measures require fair share funding for future water and wastewater upgrades.

The 2022 FEIR Addendum (pages 86-88) noted that the 2022 UDSP Amendment would decrease development yield and decrease the overall demand for utilities compared to the previously approved UDSP.

***Discussion of the Proposed Project:*** The proposed CubeSmart project would decrease the overall intensity of development for the CubeSmart site compared to what could be developed under the Office/Commercial District designation (up to six stories of mixed use or freeway commercial use) and what was analyzed in the UDSP FEIR and Addenda. This results in a reduced amount of demand for utilities.

**Water and Wastewater:** The CubeSmart project would be required to coordinate with VWD for project-specific water and wastewater needs and would pay VWD water and wastewater development fees to be used toward future capital improvements identified in VWD's master plan. To meet fire flow requirements, the project will upgrade 1,600 feet of waterline within E. Carmel Street between the project site and Venture Street. The improvement will upgrade the existing 6-inch ACP to a 12-inch PVC (VWD 2025). This improvement would occur beneath and existing paved street and would not result in environmental impacts.

**Electricity and Natural Gas:** Similarly, the CubeSmart project applicant would be required to coordinate with SDG&E for electricity and gas service.

**Stormwater Drainage:** Stormwater drainage was addressed in Section 10, Hydrology and Water Quality, above. As described in the SWQMP, runoff generated by the proposed CubeSmart project would be conveyed via a proposed private storm drain system into two proposed private underground detention systems. A flow control/bypass structure downstream of each underground detention system would route the flow into a corresponding proposed private proprietary biofiltration system. Runoff would then continue downstream via a proposed private storm drain system into an existing box culvert which flows under E. Carmel Street and SR-78 and continues through an existing reinforced concrete pipe which ultimately discharge to San Marcos Creek. San Marcos Creek flows southwest, to Lake San Marcos, and then continues to Batiquitos Lagoon, ultimately discharging to the Pacific Ocean. The proposed storm drain facilities are located within the project's footprint and would not result in additional environmental impacts not already disclosed.

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. The site is currently served by VWD for water and sewer and necessary stormwater infrastructure and utilities are in place. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any issues related to utilities and service systems would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, no new impacts are identified for this issue area. The previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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**b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?**

**FEIR Conclusion: Mitigated to Below a Level of Significance.** The FEIR (page 3.14-28) determined that the water demand for the project would be 1,207,011 gallons per day (gpd). Water supply impacts were determined to be significant, and improvements would be required for water storage and water infrastructure to accommodate the increase in demand due to the proposed project. Mitigation measures US-1 through US-3 would provide water pipeline improvements and payment of fees towards the provision of additional water storage. Improving infrastructure and increasing storage would reduce impacts to below a level of significance.

The 2022 FEIR Addendum (page 89) noted that the 2022 UDSP Amendment would decrease development yield and decrease the overall demand for utilities compared to the previously approved UDSP. Specifically, the 2022 UDSP Amendment would decrease overall water demand by 231,786 gpd, or approximately 19% compared to what was previously analyzed.

**Discussion of the Proposed Project:** The proposed CubeSmart project would decrease the overall intensity of development for the CubeSmart site compared to what could be developed under the Office/Commercial District designation (up to six stories of mixed use or freeway commercial use) and what was analyzed in the UDSP FEIR and Addenda. This results in a reduced demand for water supplies. VWD's Master Plan assumed the buildout of the previously approved UDSP in their water planning efforts. Therefore, the less intensive water demand under the proposed CubeSmart project would have been accounted for in the Master Plan and there are no new significant impacts or an increase in impacts related to water supply.

Additionally, since certification of the FEIR, there have been additional requirements related to water conservation and water efficiency through CALGreen (California Green Building Standards Code). The CubeSmart project would have to adhere to the latest CALGreen requirements which would reduce water demand. Local requirements include water efficiency measures that are identified in the City's CAP and implementation of the City's Water Efficient Landscape Ordinance (WELo). Therefore, no new impacts are identified for this issue area.

The Hampton Inn parcels are fully developed, and the site is served by VWD for water. No redevelopment or operational changes are proposed; therefore, no changes in

water demand for the Hampton Inn parcels is anticipated. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any issues related to utilities and service systems would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

The previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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- c) **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?**

**FEIR Conclusion: Mitigated to Below a Level of Significance.** The FEIR (page 3.14-28) determined that wastewater impacts would be significant and infrastructure and treatment facility improvements are required for the UDSP project. The FEIR assumed a sewer generation of 1,058,389 gpd. Mitigation measures US-4 through US-6 require the future developer to participate in regional infrastructure improvements to accommodate the increase in wastewater flows. Additionally, payment of fees towards increased wastewater treatment capacity would ensure that adequate services are available for the proposed project. The future developers within the site will be required to enter into future water and sewer service agreements. These agreements will further detail the extent and timing of the water and sewer mitigation and define how these improvements relate to other fees to be paid to VWD. By implementing these mitigation measures, impacts to wastewater would be reduced to below a level of significance for the UDSP.

The 2022 FEIR Addendum (pages 89-90) noted that the 2022 UDSP Amendment would decrease development yield and decrease the overall demand for utilities compared to the previously approved UDSP. Specifically, the 2022 UDSP Amendment would decrease wastewater generation by 347,909 gpd or approximately 33%.

**Discussion of the Proposed Project:** The proposed CubeSmart project would decrease the overall intensity of development for the CubeSmart project site compared to what could be developed under the Office/Commercial District designation (up to six stories of mixed use or freeway commercial use) and what was analyzed in the UDSP FEIR and Addenda. This results in reduced generation of wastewater. Since VWD's Master Plan assumed a higher development yield on the project site than what is currently proposed, the CubeSmart project's less intensive water demand under the proposed project would have been accounted for in the Master Plan and would not result in any new wastewater impacts or an increase in severity of wastewater impacts.

The Hampton Inn parcels are fully developed, and the site is served by VWD for sewer service. No redevelopment or operational changes are proposed; therefore, no change in sewer generation is anticipated for the Hampton Inn site. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any issues related to utilities and service systems would have been analyzed and mitigated

under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, no new impacts are identified for this issue area. The previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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**d) Generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**

**FEIR Conclusion: Less than Significant.** The FEIR (page 3.14-19) identified that the Sycamore Sanitary Landfill would have sufficient capacity for the UDSP project assuming a 50 percent diversion rate and with the implementation of a construction waste management program to divert materials. The FEIR analysis included waste generated due to the demolition of structures on the project site.

The 2022 Amendment to the UDSP expanded the UDSP planning area to include the addition of two parcels located east of Industrial Street and the railroad tracks. One of these parcels, APN 220-201-90-00, is associated with the proposed CubeSmart project site. The 2022 FEIR Addendum (page 91) concluded that land uses would still be of a type considered in the UDSP FEIR, although the overall development yield would decrease.

**Discussion of the Proposed Project:** The proposed CubeSmart project would decrease the overall intensity of development for the CubeSmart project site compared to what could be developed under the Office/Commercial District designation (up to six stories of mixed use or freeway commercial use) and what was analyzed in the UDSP FEIR and Addenda. Additionally, since certification of the FEIR, there have been additional regulatory requirements related to recycling and landfill diversion. Thus, the amount of solid waste to be generated by the UDSP planning area, as a whole, is anticipated to be less than what was anticipated in the FEIR due to the reduction in development intensity and the increase in landfill diversion and recycling requirements. Therefore, no new impacts are identified for this issue area. The proposed CubeSmart project would comply with federal, state and local statutes and regulations related to solid waste.

The Hampton Inn parcels are fully developed. No redevelopment or operational changes are proposed under the proposed project; therefore, no change in solid waste generation is anticipated for the Hampton Inn site. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any issues related to utilities and service systems would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, the conclusions of the FEIR and 2022 FEIR Addendum apply to the proposed project and no new impacts are identified.

**Finding:** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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- e) **Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

***FEIR Conclusion: No Impact.*** The FEIR (page 3.14-3) addresses AB 939, the Integrated Waste Management Act, which identifies the diversion rate of 50 percent of solid waste through reduction, recycling, and composting activities and the mandate that all California cities and counties achieve a 75 percent diversion rate by the year 2010. According to the FEIR, the City was at a 50 percent reduction rate as of 2009 and is compliant with AB 939. The 2022 FEIR Addendum (page 91), which analyzed the additional parcels added to the UDSP, including the proposed CubeSmart project site, determined that no new impacts related to solid waste would occur.

***Discussion of the Proposed Project:*** The proposed CubeSmart project would comply with federal, state and local statutes and regulations related to solid waste and recycling.

The Hampton Inn parcels are fully developed. No redevelopment or operational changes are proposed under the proposed project; therefore, no change in solid waste generation is anticipated. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any issues related to utilities and service systems would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, the conclusions of the FEIR and 2022 FEIR Addendum apply to the proposed project and no new impacts are identified.

***Finding:*** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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**20. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones would the project:**

- a) ***Substantially impair an adopted emergency response plan or emergency evacuation plan;***
- b) ***Due to slope, prevailing wind, and other factors exacerbate wildlife risk, and thereby, expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire;***
- c) ***Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or***
- d) ***Expose people or structure to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability or drainage changes.***

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***FEIR Conclusion: Not Analyzed.*** The requirement to analyze a project’s potential impacts related to wildfire as a separate environmental topic became a requirement after certification of the FEIR. The FEIR did analyze the potential for the project to 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 and impacts were determined to be less than significant (FEIR Section 3.6).

The 2022 Amendment to the UDSP expanded the UDSP planning area to include the addition of two parcels located east of Industrial Street and the railroad tracks. One of these parcels, APN 220-201-90-00, is associated with the proposed CubeSmart project site. The 2022 FEIR Addendum (page 55) concluded that the project site is not located on or near lands classified as a very high fire hazard severity zone. Further, per Figure 6-4 of the Safety Element of the City’s General Plan, the project site and surrounding area are not identified as a SMFPD Community Hazard Zone. Thus, the 2022 FEIR Addendum concluded that the proposed project would not 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 (2022 FEIR Addendum page 55).

***Discussion of the Proposed Project:*** The CubeSmart project site and Hampton Inn parcels are not located in or near State Responsibility Area (SRA) lands nor are these sites on or near lands classified as a very high fire hazard severity zone. SRA lands are areas of the state where the State of California is financially responsible for the prevention and suppression of wildfires. SRA lands do not include lands within city boundaries or in federal ownership. As such, the UDSP planning area, including the CubeSmart site and the Hampton Inn parcels are located in a Local Responsibility Area and fire services are provided by the San Marcos Fire Department.

The UDSP planning area, including the CubeSmart site and the Hampton Inn parcels are located within a Non-Very High Fire Hazard Severity Zone (Non-VHFHSZ) designation per CalFire’s San Marcos Fire Hazards Severity Zones Map (2009) and is surrounded by areas also identified as Non-VHFHSZ. Therefore, this threshold does not apply to the project. Further, per Figure 6-4 of the Safety Element of the City’s General Plan, the project site and surrounding area are not identified as a SMFPD Community Hazard Zone. Thus, the proposed project would result in less than significant impacts related to wildfire.

***Finding:*** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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## 21. 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?**

***FEIR Conclusion:*** The Final EIR for the UDSP concluded that all biological resource impacts would be mitigated to below a level of significance (FEIR Section 3.3).

Additionally, the FEIR concluded that impacts to cultural resources would be mitigated to below a level of significance (FEIR Section 3.4).

The 2022 Amendment to the UDSP expanded the UDSP planning area to include the addition of two parcels located east of Industrial Street and the railroad tracks. One of these parcels, APN 220-201-90-00, is associated with the proposed CubeSmart project site. No new or additional impacts related to biological resources or cultural resources were identified on this parcel (2022 FEIR Addendum, Section 4 Biological Resources and Section 5 Cultural Resources).

***Discussion of the Proposed Project:*** Development under the proposed CubeSmart project would occur within the same footprint as analyzed in the 2022 FEIR Addendum. Biological resources and cultural resources mitigation identified in the FEIR would still be applicable to the proposed CubeSmart project. The proposed CubeSmart project would not result in any increase in impacts to biological resources or cultural resources compared to what was analyzed in the FEIR and 2022 FEIR Addendum.

The Hampton Inn parcels are fully developed, and no redevelopment of the Hampton Inn site is proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and any issues related to biological resources and cultural resources would have been analyzed and mitigated under that project-specific CEQA document. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

***Finding:*** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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

***FEIR Conclusion:*** The FEIR prepared for the UDSP concluded that the project would have significant and unmitigated cumulative impacts related to air quality (CO, NOx, and ROG), greenhouse gas emissions, and traffic in the 2030-time frame (SR-78 ramps/segments and the intersection of San Marcos Boulevard/Rancho Santa Fe Road). All other issues areas were determined to have cumulative impacts that were less than significant.

The 2022 FEIR Addendum noted the 2022 Amendment to the UDSP would decrease the overall intensity of development, which corresponds to a decrease in air quality emissions, greenhouse gas emissions, energy use, utility and public services demand, noise and traffic.

***Discussion of the Proposed Project:*** Development of the proposed CubeSmart project would be located in the same footprint as analyzed in the 2022 FEIR Addendum but would result in a lower overall development intensity. As part of this analysis, no new impacts were identified for traffic, air quality, or greenhouse gas emissions.

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. Development of the Hampton Inn was analyzed in Negative

Declaration #99-527 and all impacts were mitigated to below a level of significance. Moving the Hampton Inn parcels from the HOCSP to the UDSP would not result in any new impacts or contribute to any cumulative impacts. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, No new cumulative impacts are identified for the proposed project.

***Finding:*** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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

***FEIR Conclusion:*** The FEIR prepared for the UDSP did not identify any project impacts that would have environmental effects on human beings either directly or indirectly with the exception of unmitigated project- and cumulative-level air quality and greenhouse gas impacts, as discussed in 20(b), above.

The 2022 FEIR Addendum noted the 2022 Amendment to the UDSP would decrease the overall intensity of development, which corresponds to a decrease in air quality emissions, greenhouse gas emissions, energy use, utility and public services demand, noise and traffic.

***Discussion of the Proposed Project:*** Development of the proposed CubeSmart project would be located in the same footprint as analyzed in the 2022 FEIR Addendum but would result in a lower overall development intensity. There are no new impacts or issues identified that would have environmental effects on human beings either directly or indirectly that were not previously identified in the FEIR.

The Hampton Inn parcels are fully developed, and no redevelopment or operational changes are proposed. Development of the Hampton Inn was analyzed in Negative Declaration #99-527 and all impacts were mitigated to below a level of significance. Moving the Hampton Inn parcels from the HOCSP to the UDSP would not result in any new impacts to human beings either directly or indirectly. Any future redevelopment of the Hampton Inn site would be subject to CEQA analysis at the time a project is proposed.

Therefore, no new impacts are identified for this issue area and the previous FEIR and 2022 FEIR Addendum conclusions are still applicable for the proposed project.

***Finding:*** There are no new impacts for this issue area and no changes in information that would require preparation of an EIR.

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## **EARLIER ANALYSES**

Earlier analyses may be used where, pursuant to tiering, program EIR, or other CEQA process, one or more effects have been adequately analyzed in an earlier EIR or Negative Declaration (Section 15063(c)(3)(D)). These documents are on file with the City of San Marcos Planning Division.

- University District Specific Plan Final Environmental Impact Report. 2009 (SCH No. 2008101083).
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- University District Rock Crusher Conditional Use Permit Mitigated Negative Declaration. 2011 (SCH No. 2011081083).
  - University District Specific Plan Amendment Initial Study and Final EIR Addendum. 2014.
  - University District Specific Plan Final EIR Addendum for Block 3/Extended Learning Building. 2017.
  - University District Specific Plan - Mesa Rim Substantial Conformance. 2019.
  - *University District Specific Plan Final EIR Addendum for SP21-0002 / SP22-0002 / GPA21-0005 / SM21-0002 / SDP21-0003*. 2022.
  - Negative Declaration #99-527 for CUP 99-429/TA 00-42 (Hampton Inn). December 23, 1999.
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Geotechnical Exploration, Inc. (GEI) 2025. Geotechnical Report Update Letter. January 29, 2025.

LDN Consulting (LDN). 2025a. CubeSmart Greenhouse Gas Assessment – City of San Marcos. January 15, 2025.

LDN Consulting (LDN). 2025b. CubeSmart Noise Assessment – City of San Marcos. January 15, 2025.

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San Diego Association of Governments (SANDAG). 2002. Not So Brief Guide of Vehicular Traffic Generation rate for the San Diego Region. April 2020.

[https://www.sandiegocounty.gov/content/dam/sdc/pds/ceqa/LehmanTPM/38%20Appendix%20T9\\_SANDAG%20Trip%20Generation%20Rates.pdf](https://www.sandiegocounty.gov/content/dam/sdc/pds/ceqa/LehmanTPM/38%20Appendix%20T9_SANDAG%20Trip%20Generation%20Rates.pdf) Viewed October 29, 2024.

Stevens Cresto Engineers (SCE) 2025a. Preliminary Drainage Study: CubeSmart Self Storage, CUP24-005, San Marcos, CA. March 14, 2025.

Stevens Cresto Engineers (SCE) 2025b. Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP) for CubeSmart Self Storage. 337 E. Carmel Street San Marcos, CA. March 14, 2025.

Urban Systems Associates. 2025. Traffic Generation Re: CubeSmart Self Storage and Hampton Inn Boundary Adjustments Memorandum. September 4, 2025.

Urban Systems Associates. 2022. University District Local Transportation Analysis. May 19, 2022.

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Figure 1. UDSP Planning Area

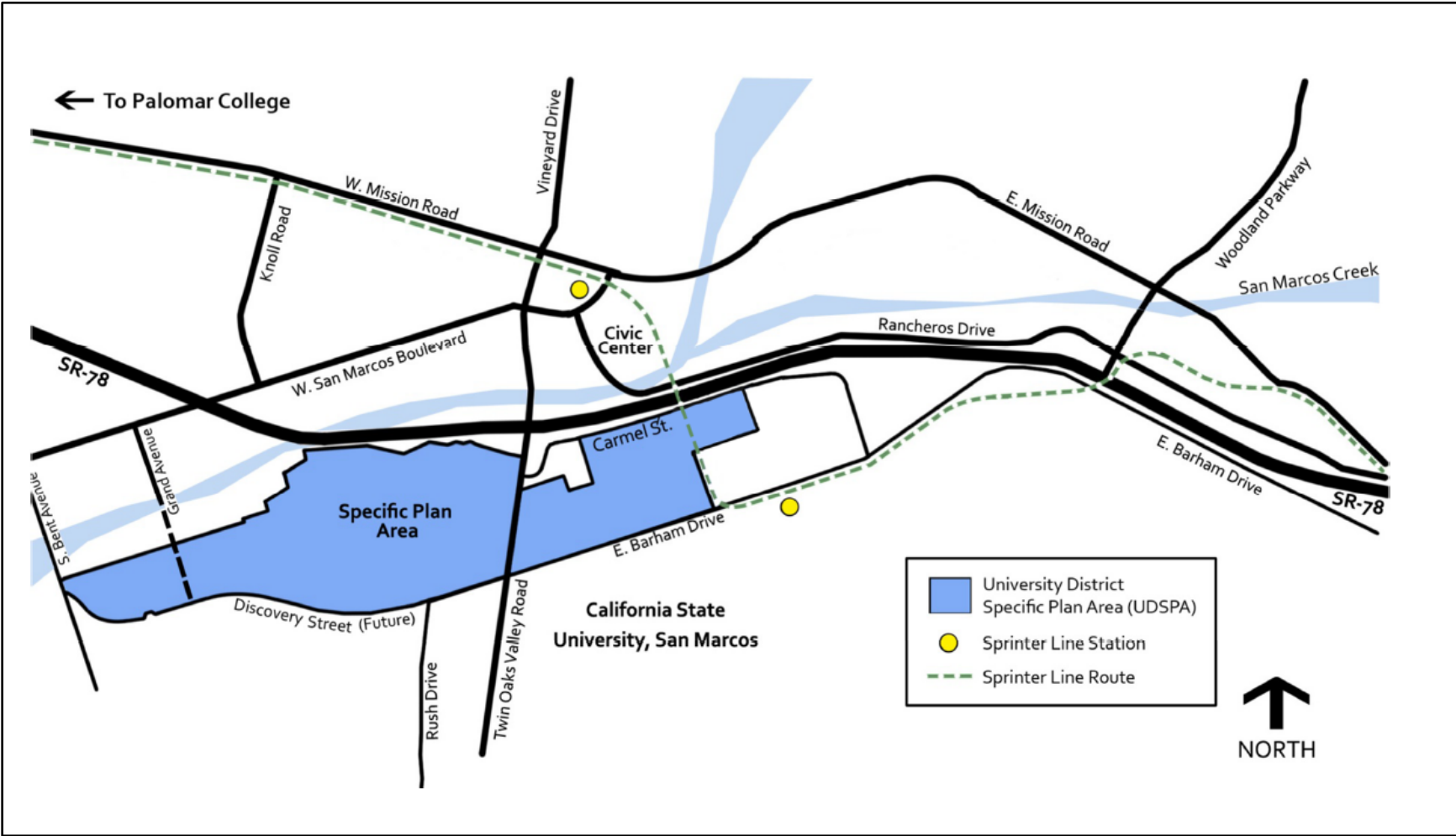
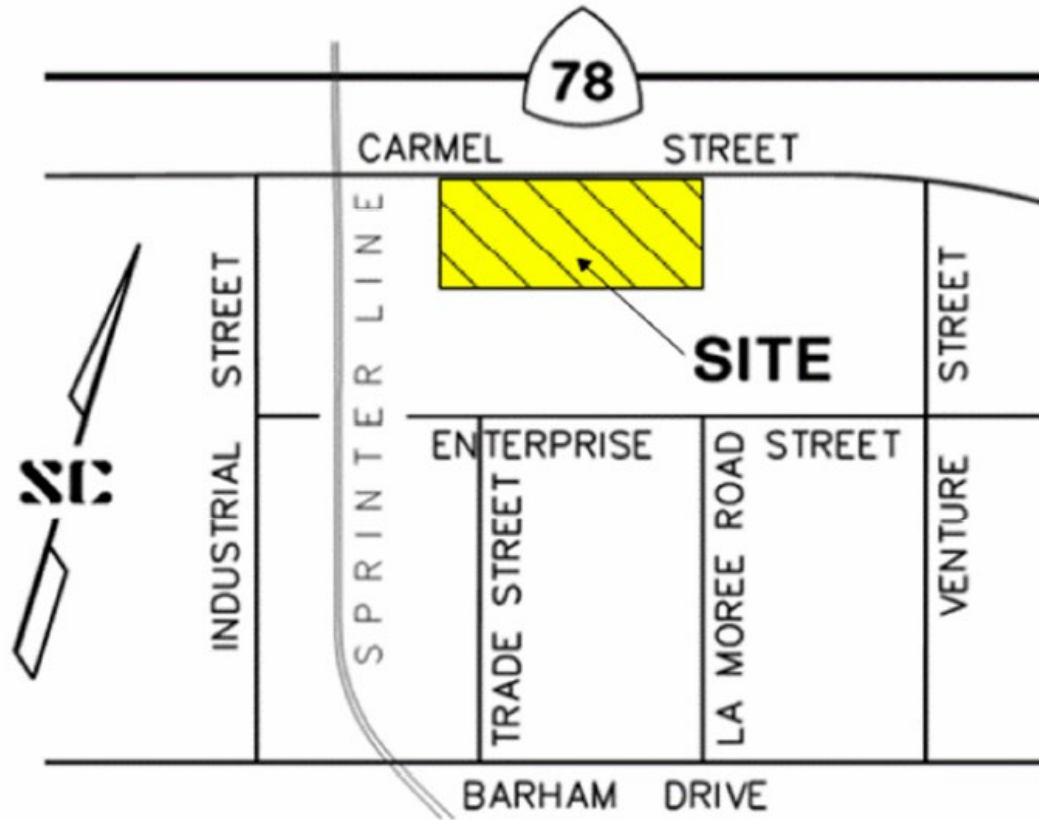


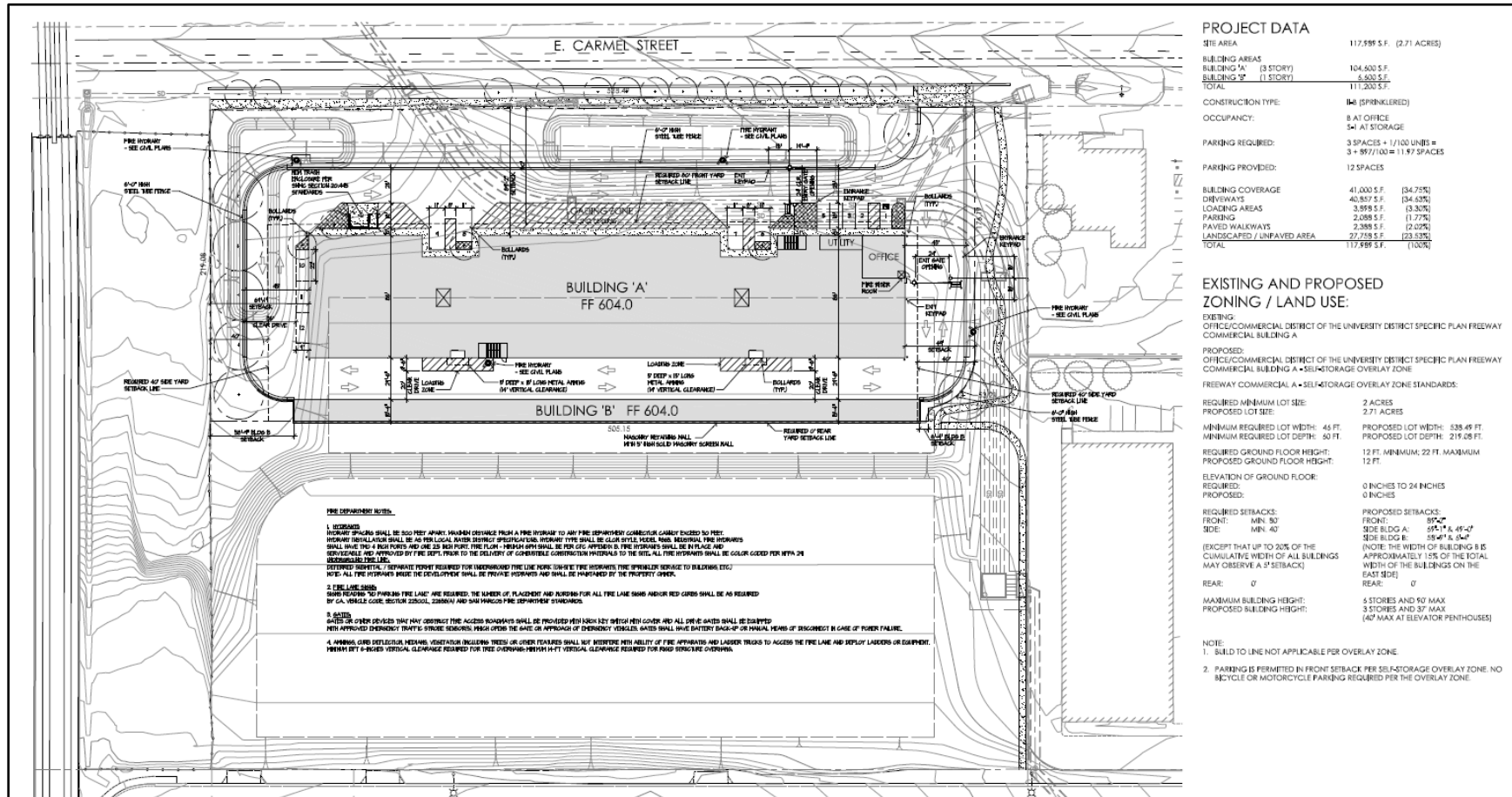
Figure 2. CubeSmart Project Site



THOMAS BROTHERS COORD:  
PAGE 1128; GRID J1  
**VICINITY MAP**  
NO SCALE



Figure 3. CubeSmart Site Plan



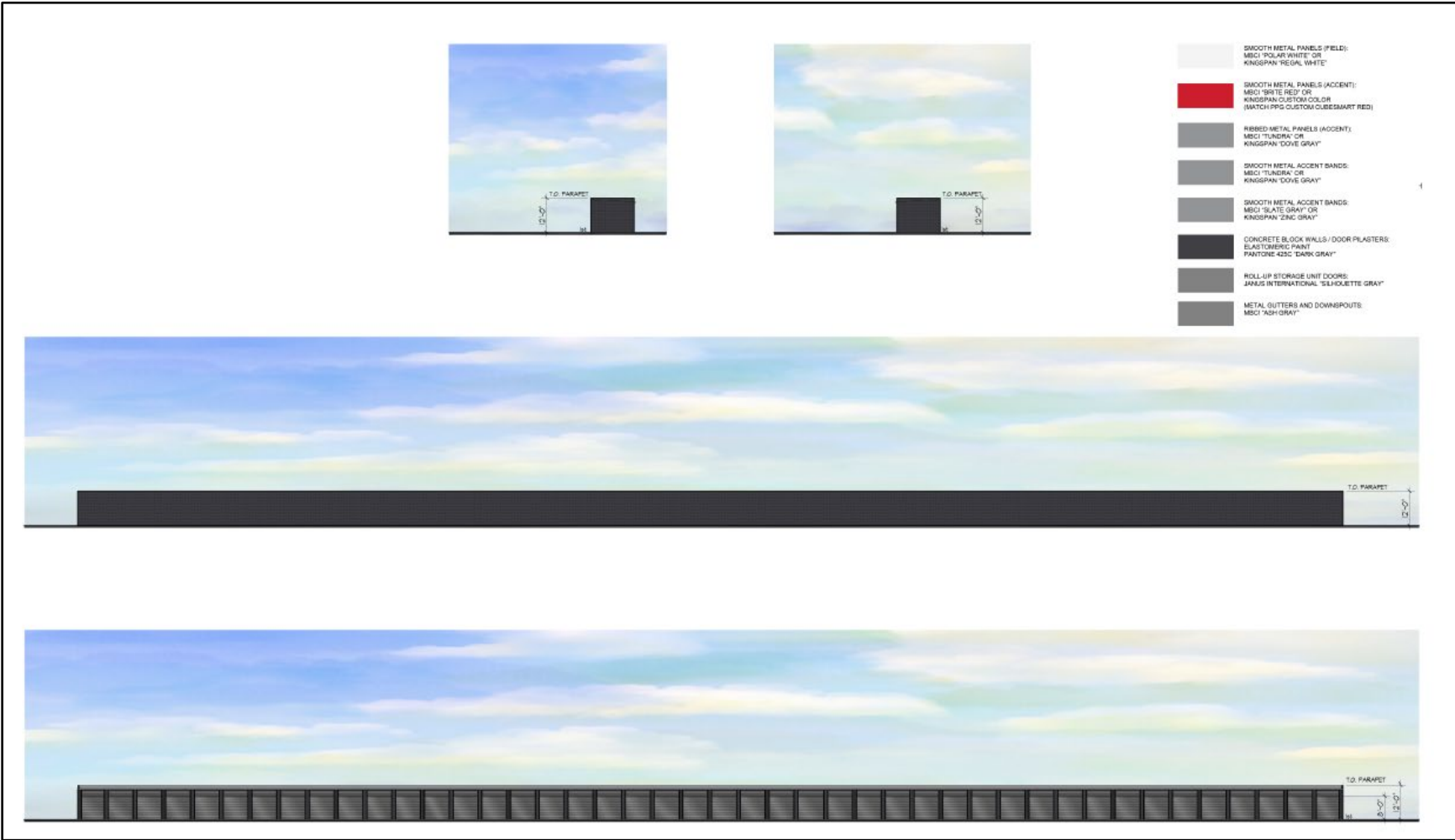
Source: Valli Architectural Group

Figure 4a. CubeSmart Building A Elevation



Source: Valli Architectural Group

Figure 4b. CubeSmart Building B Elevation



Source: Valli Architectural Group

Figure 5a. Eastbound SR-78 (Existing View)



Figure 5b. Eastbound SR-78 (Proposed Condition)

All images are concept only.  
Design may change during final review.



Figure 6a. Westbound SR-78 (Existing View)



Figure 6b. Westbound SR-78 (Proposed Condition)

All images are concept only.  
Design may change during final review.



Figure 7a. Rancheros Drive/Valpreda Road View (Existing View)





Figure 7b. Rancheros Drive/Valpreda Road View (Proposed Condition)

All images are concept only.  
Design may change during final review.

