

Urban Core Specific Plan

Final Environmental Impact Report

September 2006



Final
Environmental Impact Report
for the
City of Chula Vista Urban Core Specific Plan
EIR #06-01
SCH #2005081121

Lead Agency

City of Chula Vista
Community Development Department
276 Fourth Avenue
Chula Vista, CA 91910

September 15, 2006



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**PREFACE TO THE
FINAL URBAN CORE SPECIFIC PLAN
ENVIRONMENTAL IMPACT REPORT**

The Final Environmental Impact Report (EIR) for the City of Chula Vista Urban Core Specific Plan (UCSP) is comprised of the following:

Errata – The Errata summarizes the changes that have been made to the text of the Draft EIR (DEIR) based on the letters of comment received during the public review period or input from City staff. Also contained in the Errata is a summary and evaluation of refinements that were made to the UCSP as reflected in the “Public Hearing” Draft UCSP (September 2006). All of the refinements and corrections have been reviewed, and none of them affect the impact analysis and/or significance conclusions in the DEIR.

Public Review Letters and Responses – The letters of comment received during the DEIR public review period and the numbered responses precede the text of the DEIR.

Revisions to the DEIR - In response to public comments, the text of the DEIR has been modified. Changes to text are indicated by ~~strikeout~~ (deleted) and underline (inserted) markings.

Mitigation, Monitoring, and Reporting Program – As required by Section 21081.6 of the Public Resources Code, a listing of the mitigation requirements and the responsible parties for implementing the requirements is included.

ERRATA

FINAL URBAN CORE SPECIFIC PLAN

ENVIRONMENTAL IMPACT REPORT

In response to public comments, the text of the EIR has been modified which is indicated in underline and strikeout format as follows:

~~Old Text~~ Revised Text

The Final EIR is organized in the same manner as the Draft EIR (DEIR), as each section of the document has retained the same section number. Immediately following the title page of the EIR are the comments and responses to the Draft EIR. Following the comments and responses is the revised DEIR. Where changes in the text have been made in response to comments on the DEIR, such changes are noted in the responses.

Specifically, these changes to the EIR are limited to the following sections:

Executive Summary- The summary table has been revised to incorporate updated revisions to cultural resources, noise, traffic, and air quality, as described further below.

Cultural Resources - See revisions throughout Section 5.3 Cultural Resources. In general, the Cultural Resources section was revised to more clearly describe the 1985 Historic Resources Inventory. The DEIR stated that the UCSP DEIR incorporates by reference the General Plan Update (GPU) EIR which did reference the City's 1985 Historic Resources Inventory. While the majority of the sites inventoried for the 1985 survey occur outside of the UCSP Subdistricts area, the DEIR has been revised to more directly make this point. The DEIR has been revised to include a description of the City's 1985 Historic Resources Inventory and added a new subsection entitled "Other Sites of Historical Interest." The existing inventory will be considered, along with other resource surveys, as applicable, in the future evaluation of development proposals. The conclusions in the DEIR regarding potential significant impacts to historical resource remain the same and mitigation will continue to be required as determined based on subsequent review of individual site specific development proposals. The additional discussion does not change the conclusions of the DEIR and augments the existing designated and potentially eligible sites that may be considered in the impact analysis of subsequent development projects proposed on or adjacent to the sites.

Traffic, Circulation and Access: The following mitigation measure was added to Section 5.8.5 of the DEIR to further ensure coordination between the City of Chula Vista, Caltrans, SANDAG and other entities in the regional planning effort related to the I-5 South Corridor Plan.

Mitigation Measure:

5.8.5-6 The City shall participate in a multi-jurisdictional effort conducted by Caltrans and SANDAG to assist in developing a detailed engineering study of the freeway right of way that will identify transportation improvements along with funding, including federal, state, regional, and local funding sources, and phasing, that would reduce congestion consistent with Caltrans Standards on the I-5 South corridor from the State Route 54 (SR-54) interchange to State Route 75 (SR-75)/Palm Avenue (the "I-5 South Corridor") (hereinafter, the "Plan"). Local funding sources may include fair share contributions by private development based on nexus as well as other mechanisms. The Plan required by this mitigation shall include the following:

- 1) The responsible entities (the "Entities") included in this effort will include, but may not be limited to: the City, the Port, SANDAG, and Caltrans. Other entities may be included upon the concurrence of the foregoing Entities.
- 2) The Plan will specifically identify physical and operational improvements to I-5, relevant arterial roads and transit facilities (the "Improvements"), that are focused on specific transportation impacts and will also identify the fair share responsibilities of each Entity for the construction and financing for each Improvement. The Plan may also identify other improvements necessary to address regional transportation needs, but for purposes of this mitigation measure, the Improvements included in the Plan need only be designed to mitigate the impacts created by the Proposed Project.
- 3) The Plan will set forth a timeline and other agreed-upon relevant criteria for implementation of each Improvement.
- 4) The Plan will identify the total estimated design and construction cost for each Improvement and the responsibility of each Entity for both implementation and funding of such costs.
- 5) The Plan will include the parameters for any fair-share funding contributions to be implemented, that would require private and/or public developers to contribute to the costs, in a manner that will comply with applicable law.

- 6) In developing the Plan, the Entities shall also consider ways in which the Improvements can be coordinated with existing local and regional transportation and facilities financing plans and programs, in order to avoid duplication of effort and expenditure; however, the existence of such other plans and programs shall not relieve the Entities of their collective obligation to develop and implement the Plan as set forth in this mitigation measure. Nothing in the Plan shall be construed as relieving any Entity (or any other entity) from its independent responsibility (if any) for the implementation of any transportation improvement.
- 7) The City shall seek adoption of the Plan before the City Council upon the completion of the multi-jurisdictional effort to develop the Plan. The City shall report, to their governing bodies regarding the progress made to develop the Plan within six months of the first meeting of the Entities. Thereafter, the City shall report at least annually regarding the progress of the Plan, for a period of not less than five years, which may be extended at the request of the City Council.
- 8) The Plan shall also expressly include each Entity's pledge that it will cooperate with each other in implementing the Plan.

The failure or refusal of any Entity other than the City to cooperate in the implementation of this mitigation measure shall not constitute failure of the City to implement this mitigation measure; however, the City shall use its best efforts to obtain the cooperation of all responsible Entities to fully participate in order to achieve the goals of the mitigation measure.

The additional mitigation measure does not change the impact analysis or significance conclusions of the DEIR.

Noise – Clarifying language has been added to Mitigation Measure 5.9-1 to address potential site specific impacts on Woodlawn Avenue as a result of a projected increase of 3 decibels or greater, as identified in Tables 5.9-3 and 5.9-4 of the DEIR. Site specific noise impacts, including potential off-site impacts, would be required to be evaluated at the time a development proposal or capital improvement project to construct Woodlawn Avenue is proposed. The additional clarifying language does not change the impact analysis or significance conclusions of the DEIR.

Air Quality – Clarifying language has been added to Section 5.10.3.4 b. - Health Risk Assessment of the DEIR on page 5-227 to further explain the modeling procedure used to estimate the levels of diesel particulates at various distances from the freeway, and in particular assumptions about the vehicle population. As

a result, Chapter 6.0 Health Risk Assessment on page 39 of the Air Quality Technical Report (Appendix E of the DEIR) has also been revised to include similar clarifying language. The additional clarifying language does not change the impact analysis or significance conclusions of the DEIR.

After completion of the Draft EIR, revisions to the Public Review Urban Core Specific Plan have been identified by City staff in order to refine plan implementation, and respond to issues raised by public input to correct minor inaccurate information. All of the refinements and corrections have been reviewed, and none of them affect the impact analysis and/or significance conclusions in the DEIR. The refinements and their evaluation are briefly summarized below. Please refer to the “Public Hearing” Draft UCSP (September 2006) for a complete description of the revisions/edits to the “Public Review” Draft UCSP (April 2006).

The Public Hearing Draft UCSP contains the following changes:

- Subdistricts Area boundary changes - Subdistricts Area boundary changes have been identified for eight areas and are recommended for inclusion in the Public Hearing Draft UCSP. These changes primarily affect Figure. 6.1, Specific Plan Subdistricts Area Key Map and are limited to the following:
 - a. Remove four parcels currently zoned R-2 from UC-5
 - b. Remove four parcels currently zoned R-1 from UC-16
 - c. Add one currently zoned R-3 parcel to subdistrict V-3
 - d. Remove five parcels currently zoned MHP from various Urban Core Districts (UC-10, UC-14 and UC-17)

These changes can be categorized into either: (1) staff recommendations that implement the General Plan (i.e., a through c above); and (2) staff recommendations to remove five Mobile Home Park zoned parcels from further consideration at this time (i.e., d. listed above).

This EIR is considered a worst-case scenario in terms of impacts since, with the exception of a single parcel; these changes effectively remove parcels from the UCSP subdistricts area. The result of this removal is to further limit or constrain development potential within the affected sub-districts. Impacts resulting from the full potential build-out under the UCSP have been analyzed in this EIR. As a result, the potential removal of parcels from the urban core and reduction of the potential build-out resulting from the above listed changes have already been addressed in the EIR because the change would potentially reduce or remove impacts already considered

in the EIR. None of these changes (either individually or collectively) would affect the significance conclusions of the EIR because both the General Plan consistency modifications and Mobile Home Park zoned parcel modifications would reduce or remove impacts already considered in the EIR.

- Transit Focus Areas - The UC-10 subdistrict has been correctly noted as a Transit Focus Area (TFA), as identified in the 2005 General Plan. The DEIR had identified on the zoning sheets four TFA subdistricts: UC-1, UC-2, UC-12 and UC-15 (discussed in EIR project description and Chapter 5.2 Landform Alteration/Aesthetics). However, the designation of TFA in the 2005 General Plan extends on both the north and south side of H Street to reflect a ¼ mile transit service radius and includes the area covered by Subdistrict UC-10. Due to its designation as a TFA in the General Plan, the zoning sheet for UC-10 has been corrected to note so and the FAR is recommended to be increased from 1.0 to 2.0 consistent with the goals and objectives for the area which include the highest intensity and density of land uses due to proximity to the H Street transit station. The 2005 General Plan traffic model, which was used as the basis for the UCSP traffic study, assumed this area for high intensity commercial, office and residential uses. In addition, the recommended FAR reflects similar intensities assigned to the other TFAs. Other development standards such as lot coverage and building height are not proposed to change. The proposed change to note the subdistrict as a TFA on the zoning sheet and the increase the proposed FAR from 1.0 to 2.0 does not change the impact analysis and significance conclusions of the DEIR.
- Neighborhood Transition Combining Districts (NTCD) - Three additional NTCDs have been correctly identified and named in the Public Hearing Draft UCSP: UC-5, V-4 and C-2. Each of these subdistricts is located immediately adjacent to either R-1 or R-2 zoned parcels and as such, these subdistricts would be subject to additional development regulations and design guidelines required of future development proposals to ensure harmonious transitions. Although the DEIR identified 6 NTCD subdistricts: V-3, UC-6, UC-8, UC-11, UC-13, and C-1 (discussed in EIR Project Description and Chapters 5.1 Land Use and 5.2 Landform Alteration/Aesthetics), the extension of this provision will ensure additional protections that limit potential impacts. As such, these changes (either individually or collectively) would not affect the impact analysis or significance conclusions of the DEIR.
- Building Height Exceptions - Based on public input received, staff is recommending that a building height exception of up to 5 feet above the maximum height be considered if requested for the sole purpose of allowing an increase in the first floor (only) ceiling height to further enhance building design and pedestrian orientation. The height exception for the ground floor is applicable to all subdistricts except V-2, and affects EIR Chapters 3.0 Project Description, and Chapters 5.1 Land Use and 5.2 Landform Alteration/Aesthetics. This exception would not be allowed by right but

would be considered on a case by case basis during the design review of the development application. The potential height increases are considered minimal and will be addressed at the project level through the required wind and solar access studies. Due to the limited application and area focused on first floor only, the building height exception is not considered to change the impact analysis or significance conclusions of the DEIR.

- Green Building Incentive – The Green Building Incentive shown on Figure 6.66 of the Urban Amenities Table is proposed to be added to the Corridors District in addition to the Village and Urban Core Districts. The Green Building Incentive program is discussed in general terms in various parts of the DEIR – Chapter 5.7 Water Quality, 5.12 Energy, and Chapter 8.0 Irreversible Effects. The DEIR did not specifically refer to the incentive program’s applicability in only the 2 districts and the attendant effects of application of the incentive on a project by project basis is not known, because it is not a mandatory requirement. As a result, the Green Building Incentive Program is not relied upon as a mitigation measure and as such, this change would not affect the significance conclusions of the DEIR.
- Parking Incentive – The Parking Incentive shown on Figure 6.66 of the Urban Amenities Table is recommended to be extended to all subdistricts in the urban core. Rather than only the Village and Urban Core Districts. The Parking Incentive is discussed in various parts of the DEIR and did not specifically refer to the incentive program’s applicability in only to the 2 districts and the attendant effects of application of the incentive on a project by project basis is not known, because it is not a mandatory requirement. As a result, the Parking Incentive is not relied upon as a mitigation measure and as such, this change would not affect the impact analysis or significance conclusions of the DEIR.
- Gateways – The DEIR identified four primary and two secondary Gateways. The Public Hearing Draft UCSP identifies the same number of Gateways but recommends changing the I-5/F Street Gateway from a Primary to a Secondary Gateway and the Fourth Ave and C Street from a Secondary to a Primary Gateway. The change is more in line with the designation of the gateways as shown in Figure 5-6 *Entryways and Gateways* of the 2005 General Plan. Gateways are discussed in Chapter 5.2 Landform Alteration/Aesthetics of the EIR. The public realm design guidelines for gateways contained in Chapter VIII.L of the UCSP would continue to apply and future design of the individual gateways would need to comply with the design guidelines. As such, these changes (either individually or collectively) would not affect the impact analysis or significance conclusions of the DEIR.
- Parks, Plazas, Paseos and Public Places - Staff recommends locating two additional potential plazas on Broadway at E and F Streets and three additional potential mid-block paseos on H Street. Parks, Plazas and Paseos are discussed in Chapter 5.11 Public Services, of the DEIR and described on Figure 8.69 of the UCSP. These

changes (either individually or collectively) would not affect the significance conclusions of the DEIR because they are consistent with the General Plan and would potentially reduce or remove impacts already considered in the EIR.

- Plaza Corridor definition - The Public Review Draft UCSP, Figure 8.69, correctly identifies the Third Avenue corridor as a special “Plaza Corridor”. The change to the Public Hearing Draft UCSP merely adds a written definition to explain the features of a “Plaza Corridor”. This change applies to DEIR Chapter 5.2 Landform Alteration/Aesthetics discussion as well as the parks discussion in Chapter 5.11. This change adds clarifying language. As a result, there is no change to the impact analysis or significance conclusions of the DEIR.
- Urban Core Development Permit Design Review Process Diagram - EIR Figure 3-30 and Chapter 3.0 Project Description of EIR has been revised to reflect input received on the Public Review Draft UCSP and also incorporates changes made to the project review process of projects in Redevelopment Project Areas, as approved by the Chula Vista Development Corporation. The definition/description of projects that qualify as “minor” projects has been revised to defer to the existing definition as provided in CVMC 19.14.582. Because the project review process is a procedural change it does not affect the impacts analysis and significance conclusions of the DEIR.

Based on public input received, staff is also recommending various modifications to the zoning sheets to the mix of Primary Land Uses to better reflect the proportion of uses generally defined in the 2005 General Plan. These changes have been correctly identified in the Public Hearing Draft UCSP and are consistent with the land use designations in the 2005 General Plan:

- V-1. Clarifies Office and Retail as a Primary Land Uses (20% Max.)
- UC-4. Clarifies Retail as a Primary Land Use (20% Max.)
- UC-10. Clarifies permitted location of Residential (Not allowed within 500’ of SW Corner of Broadway and H Street intersection) and percent of Residential (40% Max.) and Retail (50% Max.) as Primary Land Uses.
- C-1. Clarifies Residential (40% max.) as a Primary Land Use and adds associated Parking Regulations (Min. 1.5 space/dwelling unit, Guest 1 space per 10 dwelling units, Onsite Min. 100%) for residential uses.
- C-2. Clarifies Residential (70% max.) as a Primary Land Use and adds associated Parking Regulations (Min. 1.5 space/dwelling unit, Guest 1 space per 10 dwelling units, Onsite Min. 100%) for residential uses.

- C-3. Clarifies Residential (70% max.) as Primary Land Use and adds associated Parking Regulations (Min. 1.5 space/dwelling unit, Guest 1 space per 10 dwelling units, Onsite Min. 100%) for residential uses.

The DEIR included zoning sheets for each of these subdistricts in Chapter 3.0 Project Description. The 2005 General Plan traffic model, which was used as the basis for the UCSP traffic study, assumed the general mix of land uses as described above. Therefore, these changes (either individually or collectively) would not affect the impact or significance conclusions of the DEIR.

**City of Chula Vista Urban Core Specific Plan
EIR #06-01
Letters of Comment and Responses**

Letters of comment to the Draft EIR (DEIR) were received from the following agencies and organizations. Comment letters received during the DEIR public review period contained accepted revisions that resulted in changes to the Final EIR text. Revisions to the Final EIR are intended to correct minor discrepancies and provide additional clarification. The revisions do not constitute significant changes to the project or environmental setting, no new significant environmental effects have been identified for the project, and the severity of environmental impacts would not be increased.

Federal Agencies

None

State Agencies

Letter A	California Department of Toxic Substances Control	PR-2
Letter B	California Department of Transportation (Caltrans District 11)	PR-9
Letter C	California Department of Highway Patrol	PR-16
Letter D	California Public Utilities Commission	PR-18

Local Agencies

None

Local Organizations

Letter E	Sierra Club	PR-20
Letter F	San Diego County Archaeological Society, Inc.	PR-32
Letter G	Urban Crossroads	PR-35
Letter H	The Planning Center	PR-43
Letter I	Foley & Lardner LLP, Attorneys at Law	PR-66
Letter J	Environmental Health Coalition	PR-115

Other Individuals

Letter K	Peter Watry	PR-137
Letter L	Susan Walter	PR-139
Letter M	Anna Buzaitis	PR-145
Letter N	Chula Vista Redevelopment Corporation Close of Public Review Comments	PR-148



Linda S. Adams
Secretary for
Environmental Protection



Department of Toxic Substances Control

Maureen F. Gorsen, Director
5796 Corporate Avenue
Cypress, California 90630

Letter A



Arnold Schwarzenegger
Governor

July 7, 2006

Mr. Brian Sheehan
City of Chula Vista
276 Fourth Avenue
Chula Vista, California 91910

NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE CITY OF CHULA VISTA URBAN CORE SPECIFIC PLAN PROJECT (SCH#2005081121)

Dear Mr. Sheehan:

The Department of Toxic Substances Control (DTSC) has received your submitted Notice of Preparation (NOP) document for the above-mentioned project. "The UCSP would govern the redevelopment of three planning districts in traditional downtown city of Chula Vista, which encompass 690 gross acres within a 1,700-acre study area. The UCSP would provide detailed neighborhood-specific land use and development regulations, development design guidelines, sustainable development goals, mobility standards, and public realm design guidelines, and numerous other incentives and programs to revitalize the urban core in accord with the general goals stated in the city of Chula Vista General Plan (2005). Each district would contain a mix of primarily low-to mid-rise (45 to 84 feet in height), medium to high-density commercial, office, and residential uses and various public amenities such as improved pedestrian streetscapes, bicycle and transit facilities, public art, and parks, plazas and paseos. Ultimate build out of the UCSP would allow up to 7,100 net new residential units, one million square feet of new commercial retail, 1.3 million square feet of new commercial office space and 1.3 million square feet of new commercial visitor-serving uses by the year 2030".

Based on the review of the submitted NOP document DTSC has comments as follow:

- A-1 1. The draft EIR needs to identify and determine whether current or historic uses at the Project site have resulted in any release of hazardous wastes/substances at the Project area.
- A-2 2. The draft EIR needs to identify any known or potentially contaminated sites within the proposed Project area. For all identified sites, the draft EIR should evaluate

whether conditions at the site pose a threat to human health or the environment. A Phase I Assessment may be sufficient to identify these sites. Following are the databases of some of the regulatory agencies:

- National Priorities List (NPL): A list is maintained by the United States Environmental Protection Agency (U.S.EPA).
- CalSites: A Database primarily used by the California Department of Toxic Substances Control.
- Resource Conservation and Recovery Information System (RCRIS): A database of RCRA facilities that is maintained by U.S. EPA.
- Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS): A database of CERCLA sites that is maintained by U.S.EPA.
- Solid Waste Information System (SWIS): A database provided by the California Integrated Waste Management Board which consists of both open as well as closed and inactive solid waste disposal facilities and transfer stations.
- Leaking Underground Storage Tanks (LUST) / Spills, Leaks, Investigations and Cleanups (SLIC): A list that is maintained by Regional Water Quality Control Boards (RWQCBs).
- Local County and City maintain lists for hazardous substances cleanup sites and leaking underground storage tanks.

- A-3 3. The draft EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may be contaminated, and the government agency to provide appropriate regulatory oversight. If hazardous materials or wastes were stored at the site, an environmental assessment should be conducted to determine if a release has occurred. If so, further studies should be carried out to delineate the nature and extent of the contamination, and the potential threat to public health and/or the environment should be evaluated. It may be necessary to determine if an expedited response action is required to reduce existing or potential threats to public health or the environment. If no immediate threat exists, the final remedy should be implemented in compliance with state laws, regulations and policies.

- A-4 4. If the subject property was previously used for agriculture, onsite soils could contain pesticide residues. Proper investigation and remedial action may be necessary to ensure the site does not pose a risk to the future residents.
- A-5 5. All environmental investigations, sampling and/or remediation should be conducted under a Workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous waste cleanup. The findings and sampling results from the subsequent report should be clearly summarized in the EIR.
- A-6 6. Proper investigation, sampling and remedial actions, if necessary, should be conducted at the site prior to the new development or any construction, and overseen by a regulatory agency.
- A-7 7. If any property adjacent to the project site is contaminated with hazardous chemicals, and if the proposed project is within 2,000 feet from a contaminated site, then the proposed development may fall within the "Border Zone of a Contaminated Property." Appropriate precautions should be taken prior to construction if the proposed project is within a "Border Zone Property
- A-8 8. Human health and the environment of sensitive receptors should be protected during the construction or demolition activities. A study of the site overseen by the appropriate government agency might have to be conducted to determine if there are, have been, or will be, any releases of hazardous materials that may pose a risk to human health or the environment.
- A-9 9. If it is determined that hazardous wastes are, or will be, generated by the proposed operations, the wastes must be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code, Division 20, chapter 6.5) and the Hazardous Waste Control Regulations (California Code of Regulations, Title 22, Division 4.5). If so, the facility should obtain a United States Environmental Protection Agency Identification Number by contacting (800) 618-6942.
- A-10 10. If hazardous wastes are (a) stored in tanks or containers for more than ninety days, (b) treated onsite, or (c) disposed of onsite, then a permit from DTSC may be required. If so, the facility should contact DTSC at (818) 551-2171 to initiate pre application discussions and determine the permitting process applicable to the facility.
- A-11 11. Certain hazardous waste treatment processes may require authorization from the local Certified Unified Program Agency (CUPA). Information about the requirement for authorization can be obtained by contacting your local CUPA.

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- A-12 12. If the project plans include discharging wastewater to a storm drain, you may be required to obtain a wastewater discharge permit from the overseeing Regional Water Quality Control Board.
- A-13 13. If during construction/demolition of the project, soil and/or groundwater contamination is suspected, construction/demolition in the area should cease and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil and/or groundwater exist, the EIR should identify how any required investigation and/or remediation will be conducted, and the appropriate government agency to provide regulatory oversight.
- A-14 14. If structures on the Project Site contain potentially hazardous materials, such as; asbestos-containing material, lead-based paint, and mercury- or PCB-containing material, such materials should be removed properly prior to demolition, and disposed of at appropriate landfills or recycled, in accordance with the regulatory guidance provided in California Code of Regulation (CCR) and following the requirements of the Universal Waste Rule (40 CFR part 9).

If you have any questions regarding this letter, please contact me at (714) 484-5461 or call Mr. Al Shami, Project Manager, at (714) 484-5472 or at "ashami@dtsc.ca.gov".

Sincerely,



Greg Holmes
Unit Chief
Southern California Cleanup Operations Branch - Cypress Office

cc: Governor's Office of Planning and Research
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Mr. Guenther W. Moskat, Chief
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Response to Letter A

California Department of Toxic Services

Comments contained in this letter address the preparation of the DEIR, as though in response to an NOP, not an NOC and completion of DEIR. Nonetheless, these advisory comments are responded to below.

- A-1** As presented on pages 5-283 to 5-294, Chapter 5.13, of the DEIR, a regulatory database search of the project site and surrounding are yielded identification of 103 sites of potential hazardous concern within the UCSP Subdistricts Area. Of these, 33 properties were included in the state Leaking Underground Storage Tanks (LUST) list, 8 were included in the federal Emergency Response Notification System (ERNS) spill reports, 3 were included in the Regional Water Quality Control Board's Spills, Leaks, Investigation and Cleanup (SLIC) list, approximately 34 were included in the federal corrective action (CORRACTS) list, and 2 properties were included in the state Toxic Substances Control (DTSC) list of releases.
- A-2** Chapter 5.13 of the DEIR included identification of 103 sites within the UCSP area that have resulted in known or potential releases of hazardous wastes or substances. As discussed on pages 5-284, 5-289, 5-293/294, and mapped in Figures 5.13-1 through 5.13-8, identification of these sites resulted from searches on the National Priorities List (NPL), national Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS), national Resource Conservation and Recovery Act (RCRA) corrective actions (CORRACTS), national Emergency Response Notification System (ERNS), state Regional Water Quality Control Board Spills, Leaks, Investigation, and Cleanups (SLIC), state Department of Toxic Substances Control (DTSC), multi-agency Solid Waste Landfill (SWL), and the multi-agency Underground Storage Tank (UST) and Leaking Underground Storage Tank (LUST) databases.
- A-3** Mitigation Measures 5.13-1, 5.13-2, and 5.13-3 in Chapter 5.13 of the DEIR identify the mechanisms to initiate further investigations and/or required remediation for any site that may be contaminated or any subsequent project that proposes to use, transport, store or dispose of hazardous materials. As presented on page 5-304, Mitigation Measure 5.13-1 requires that subsequent individual development projects that propose to use, transport, store, or dispose of hazardous materials comply with relevant agencies prior to approval of a development permit. Mitigation Measure 5.13-2 (page 5-304) requires a risk assessment for all sites within the study area where contamination has been identified or is discovered during future soil disturbance or construction activities. The risk assessment is required to address risks posed by any residual contamination and to establish appropriate mitigation measures in accordance with a Work Plan that is approved by the regulatory agency having oversight of

the activities. Mitigation Measure 5.13-3 (pages 5-304 – 5-305) requires a hazardous building materials survey to be performed at all buildings within the study area prior to demolition or renovation activities. The hazardous building materials survey is required to be conducted under the direct supervision of a state certified asbestos consultant and EPA lead assessor, and a licensed abatement removal contractor is required to remove and properly dispose of any hazardous materials in accordance with applicable local, state, and federal regulations.

- A-4** This comment states that if the subject property was previously used for agriculture, on-site soils could contain pesticide residues and proper investigation and remedial action may be necessary to ensure the site does not pose a risk to the future residents.

As discussed in Chapter 4.0 Environmental Setting, Chapter 5.1 Land Use, Chapter 5.3 Cultural Resources, and Chapter 5.13 Hazards/Risk of Upset, the UCSP area was historically used for limited agriculture (primarily orchards surrounding large residences, known as "orchard homes") but has been developed since the early 1900s with urban uses. The UCSP area represents the early business district of the City of Chula Vista and potential health risks to future residents is more likely to arise from previous commercial use rather than historic agricultural use. Mitigation Measure 5.13-2 (page 5-304) requires the preparation of a risk assessment for all sites within the study area where contamination has been identified or is discovered during future soil disturbance or construction activities. The risk assessment is required to address risks posed by any residual contamination and to establish appropriate mitigation measures in accordance with a Work Plan that is approved by the regulatory agency having oversight of the activities.

- A-5** This comment pertains to project-level investigation and reporting. The proposed UCSP is a zoning level document and as such this DEIR is a program EIR. The program EIR contains program-level Mitigation Measures 5.13-1, 5.13-2, and 5.13-3 which identify the mechanisms to initiate investigation and/or required remediation for subsequent future individual projects. See also response to Comment A-3.

- A-6** See response to Comment A-5.

- A-7** A Border Zone Property (BZP) is a formal designation made by the Department of Toxic Substances Control for properties located within 2,000 feet of a significant disposal of hazardous waste (known as a Hazardous Waste Property or HWP). To be identified as a BZP or HWP, a property has to be evaluated through the formal HWP or BZP determination process (Chapter 6.5, Health and Safety Code section 25221.) Results of the database research referred to in

responses to Comments A-1 and A-2 did not identify any properties within or surrounding the UCSP area as having HWP or BZP designation. See also response to Comment A-5.

- A-8** See responses to Comments A-3 and A-5.
- A-9** See responses to Comments A-3 and A-5.
- A-10** See responses to Comments A-3 and A-5.
- A-11** See responses to Comments A-3 and A-5.
- A-12** An analysis of water quality is provided in Chapter 5.7 of the DEIR. Future individual projects will be required to comply with all applicable federal, state, and local regulations, including the requirements for wastewater discharge permits, in accordance with Chapter 14.20 of the City of Chula Vista Municipal Code. See also responses to Comments A-3 and A-5.
- A-13** Mitigation Measure 5.13-2 of the DEIR (pages 5-304) requires a risk assessment for all sites within the study area where contamination has been identified or is discovered during future soil disturbance or construction activities. The risk assessment is required to address risks posed by any residual contamination and to establish appropriate mitigation measures in accordance with a Work Plan that is approved by the regulatory agency having oversight of the activities. See also responses to Comments A-3 and A-5.
- A-14** Mitigation Measure 5.13-3 of the DEIR (pages 5-304/305) requires a hazardous building materials survey to be performed at all buildings within the study area prior to demolition or renovation activities. The hazardous building materials survey is required to be conducted under the direct supervision of a state certified asbestos consultant and EPA lead assessor, and a licensed abatement removal contractor is required to remove and properly dispose of any hazardous materials in accordance with applicable local, state, and federal regulations. See also responses to Comments A-3 and A-5.

DEPARTMENT OF TRANSPORTATION

District 11 • 4050 Taylor St. • M.S. 240
 San Diego, CA 92110
 PHONE (619) 688-6954
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July 10, 2006

**11-SD-005
 PM 7.81**

Mr. Brian Sheehan
 City of Chula Vista Community Development
 276 Fourth Avenue
 Chula Vista, CA 91910

RE: Chula Vista – Urban Core Specific Plan – Draft EIR (SCH 2005081121)

To Mr. Sheehan:

The California Department of Transportation (Caltrans) appreciates the opportunity to review the Draft Environmental Impact Report (EIR) for the proposed Chula Vista Urban Core Specific Plan redevelopment project, involving 7,100 new residential units, one million square feet of new commercial retail, 1.3 million square feet of new commercial office space, and 1.3 million square feet of new visitor-serving commercial on approximately 690 acres south of State Route 54 (SR-54), west of Interstate 805 (I-805), immediately east of Interstate 5 (I-5) between 'D' Street and 'L' Street in the "older downtown" part of the City of Chula Vista (the City). We have the following comments.

- The intensification of land use associated with the project as proposed has the potential to produce an estimated 331,100 Average Daily Trips (ADT) which would significantly impact existing state transportation facilities in the area (e.g., I-5, I-805, SR-54, and associated on- and off-ramps). Caltrans endeavors that direct impacts to the State highway system be eliminated or reduced to a level of insignificance pursuant to California Environmental
- B-1
- B-2 Quality Act (CEQA) and National Environmental Policy Act (NEPA) standards. Cumulative impacts of a project, together with other related or nearby projects, must also be considered and analyzed when determining a project's impacts. A cumulative impact is the sum of the impacts of existing conditions, other projects, and the project itself. Caltrans supports the concept of "fair share" contributions for future interchange improvement projects, ramp improvements, signal installations, and/or other measures to mitigate for direct and cumulative traffic impacts created by new projects.

- Caltrans recognizes that, as described in the Draft EIR, the City of Chula Vista proposes to mitigate impacts by making improvements at various State-owned signalized intersections in and around the study area (e.g., I-5 at 'E', 'H', and 'J' Streets; and SR-54 at Broadway and 4th
- B-3 Avenue), but we are concerned with the statement on page 5-190 of the Traffic section where these improvements' "long term implementation cannot be assured at this time" and that the

"Caltrans improves mobility across California"

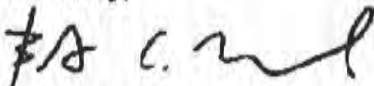
- B-4 impacts are considered "significant and unmitigated." The City should implement the improvements as noted in the mitigation section; and, in addition, the City should provide mitigation for improving bridge structures (bridge widening), improvements to on- and off-ramps (ramp widening), adding auxiliary lanes between ramps, as well as potential widening of the mainline freeway facilities themselves and dealing with the Right of Way (R/W) requirements as stated in the Draft EIR document.
- B-5 Caltrans disagrees with the statement in Section 5.8.1.3(e) (page 5-161) of the Traffic section: "[S]ince the freeway system is developed and managed by Caltrans, the City has only limited ability to affect the level of congestion on these roadways. As such, only interchanges with these freeway segments were considered in the UCSF traffic study." Any project generating the amount of traffic which the Chula Vista – Urban Core Specific Plan does will certainly affect the level of congestion on the State Highway System, and adequate measures must be taken to assure the implementation of mitigation for such impacts.
- B-6 The proposed operational improvements in the Draft EIR – and other improvements not mentioned in the EIR but specified in this letter – should be considered direct impact mitigation that needs to be constructed before development occurs. These operational improvements should be coordinated with the I-5 South Corridor Master Plan, in order to be part of the ultimate facility. Caltrans is currently working with the City and with SANDAG on this I-5 South Corridor Master Plan which will identify improvements to I-5 needed for the facility to continue to function operationally. The City, in coordination with Caltrans and SANDAG, will also need to prepare appropriate studies in order to move forward with direct impact mitigation improvements as part of the project development process.
- B-7 In addition to looking at direct impacts, the City will need to perform an improved cumulative impact analysis, which includes all existing and proposed development in the vicinity of the downtown urban core area. It is especially important to include the proposed development which is anticipated from the Chula Vista Bayfront Master Plan (CVBMP) located on the west side of I-5, which is also anticipated to add large amounts of ADTs to the transportation network in the area. This Draft EIR and the I-5 South Corridor Master Plan should be used to determine the location and type of additional improvements which will be needed to adequately mitigate the cumulative impacts for the proposed urban core redevelopment. The Corridor Master Plan should also be used to develop a methodology for implementation of a Transportation Impact Fee (TIF) program which will enable new developments to help pay for improvements to the transportation network.
- B-8

Mr. Brian Sheehan
July 10, 2006
Page 3

- B-9 Any work performed within Caltrans' Right of Way (R/W) will require an encroachment permit. If work is anticipated in the R/W, the applicant's environmental document must include such work in their project description and indicate that an encroachment permit will be needed. Information regarding encroachment permits may be obtained by contacting our Permits Office at (619) 688-6158. Early coordination with Caltrans is strongly advised for all encroachment permits. As part of the encroachment permit process, the developer must provide appropriate environmental (CEQA) approval for potential environmental impacts to Caltrans' right of way. The developer is responsible for quantifying environmental impacts of the improvements (project level analysis) and completing all appropriate mitigation measures for the impacts. The developer will also be responsible for procuring any necessary permits or approvals from the regulatory and resource agencies for the improvements.
- B-10

Caltrans appreciates the opportunity to review this development proposal. For questions regarding the Department's comments, please contact Brent C. McDonald at (619) 688-6819.

Sincerely,



for MARIO H. ORSO, Chief
Development Review Branch

c:	BMcDonald	Planning	MS-240
	BFigge	Planning	MS-240
	JHaven	Design	MS-333
	EGojuangco	Frwy Ops	MS-230
	JMarkey	Permits	MS-110
	SMorgan	State ClearingHouse	(SCH)

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*** TOTAL PAGE. 04 ***

Response to Letter B
California Department of Transportation (Caltrans District 11)

B-1 The EIR concludes that the proposed UCSP will result in both direct and cumulatively significant traffic impacts to study area freeway segments and ramps. The UCSP is a zoning document prepared to implement the long range planning goals of the City's recently updated General Plan (2005) through the year 2030. As such development will occur incrementally and the timing, sequencing, and extent are difficult to predict. Regardless, the DEIR identified projected potential buildout and associated traffic impacts that could result. The DEIR identified significant impacts for the following freeway interchanges as presented in Section 5.8.3.1.a and Table 5.8.4:

- #1: Bay Boulevard/I-5 SB ramp at E Street (LOS E – AM Peak, LOS F – PM Peak);
- #2: I-5 NB Ramp at E Street (LOS E – AM and PM Peak);
- #24: I-5 SB Ramp at H Street (LOS F – PM Peak);
- #25: I-5 NB Ramp at H Street (LOS F – PM Peak);
- #34: Broadway at SR-54 WB Ramp (LOS F – AM Peak);
- #44: Fourth Avenue at SR-54 EB Ramp (LOS F – PM Peak);
- #59: J Street at I-5 NB Ramp (LOS F – AM Peak, LOS E – PM Peak);
- #63: Bay Boulevard at I-5 SB Ramp (LOS F – AM and PM Peak); and
- #64: Industrial Boulevard at I-5 NB Ramp (LOS F – PM Peak).

The monitoring of traffic as stipulated by Mitigation Measure 5.8.5-1 will assist in establishing the need and timing for transportation improvements, including freeway-related improvements, serving the Urban Core area. In addition, Mitigation Measure 5.8.5-3 requires subsequent development projects prepare a traffic assessment to quantify the project's potential traffic impacts. Subsequent projects will be required to contribute their fair share to the Tiered Improvements listed above under Mitigation 5.8.5.1.

Mitigation of impacts will require development and regional acceptance of a feasible program to improve freeway segments and ramps in the Urban Core area. The City, along with Caltrans, and SANDAG will need to continue to pursue and promote improvement of the I-5 freeway facilities adjacent to the Urban Core area. The concept of promoting/requiring "fair-share" contributions on the part of developers for improvements to the freeway system will need to be addressed as part of the implementation of an acceptable program to improve freeway segments and ramps. As such, the specification of such requirements cannot be determined at this time. To ensure the continued participation in regional

transportation planning efforts by the City, Caltrans, SANDAG, and other entities as may be identified, Mitigation Measure 5.8.5-6 has been added to the DEIR.

The City of Chula Vista shall continue to work with SANDAG and Caltrans on an ongoing basis to identify sources and obtain funding for a variety of transportation system improvements. Future residential growth in the Urban Core will be subject to the Regional Transportation Congestion Improvement Program, as stipulated by the TransNet legislation and will provide additional funds for improvement of the regional arterial system.

- B-2** As stated above in response to Comment B-1, the UCSP is a zoning document prepared to implement the long range planning goals of the City's recently updated General Plan (2005) through the year 2030. As an implementing document of the General Plan, the UCSP relied on the General Plan traffic model which included the latest assumptions for local and regional land uses to account for the cumulative analysis. Traffic impacts are addressed in the Traffic, Circulation, and Access Section 5.8 and Cumulative Impacts Section of the DEIR.
- B-3** Traffic impacts resulting from implementation of the UCSP will only occur if projects are approved and developed in accordance with the Plan. Due to the long-term nature of some of the improvements, and in the absence of development projects, coordination of potential improvements would be premature. Therefore, the DEIR recognizes this and states the conclusion that traffic impacts remain significant and unmitigated "at this time." It is acknowledged that coordination will be necessary with Caltrans. See also response to Comment B-1.
- B-4** The Impact Analysis in Section 5.8.3 of the DEIR identified improvements that need to be made to facilities that interact with Interstate 5 and State Route 54 as stated on pages 5-179 and 5-180. See also responses to Comments B-1 and B-3.
- B-5** The smart growth principles reflected in the UCSP, including but not limited to compact design, increased density at transit stations to promote transit use, and enhanced pedestrian and bicycle improvements, will help to reduce traffic congestion on both local roads and freeways. However, improvements to freeways to mitigate existing and increased traffic is within the jurisdiction/responsibility of Caltrans. As indicated in response to Comment B-1, the City will continue to participate in Caltrans and SANDAG's efforts to plan for the future transportation needs of the I-5 Corridor and other roadways affecting access to, from, and within the urban core.

- B-6** Direct impacts mitigation is specified in Mitigation Measure 5.8.5-1 on pages 5-179 through 5-181 of the DEIR. Operational improvements include signalization of selected intersections. The mitigation measure requires that their completion be timed with need as determined and monitored through the City's existing Traffic Monitoring Plan (TMP).

In addition, in 2004, voters in San Diego County approved a 40-year extension to TransNet, a program designed to fund improvements to the region's transportation system first initiated in 1987. The prime component of the program is a half-cent sales tax increase that is projected to raise over \$8 billion for improvements through 2030. Expenditure of TransNet funds is implemented through the Regional Transportation Plan (RTP), prepared by SANDAG and updated every two years.

The most recent RTP, Mobility 2030, was adopted in 2005 and details the need for \$42 billion in transportation improvements. Of that total, \$22 billion in funding will come from a variety of state and federal sources. The remaining \$20 billion will come from existing and new local funding sources including the TransNet sales tax extension. These amounts represent the Reasonably Expected Scenario, one of three scenarios examined in the RTP and the scenario adopted by SANDAG.

In addition to the sales tax extension, the TransNet program requires implementation of a new local funding source for the RTP, the Regional Transportation Congestion Improvement Plan (RTCIP). The purpose of the RTCIP is to ensure that new development directly invests in the region's transportation system to offset the negative impacts of growth on congestion and mobility. Further, the TransNet Ordinance states the following regarding funding programs:

1. Section 9 of the TransNet Ordinance requires that local jurisdictions establish a program or mechanism that provides \$2,000 per new residential unit for the purpose of funding the Regional Arterial System, including SR-75. For purposes of the RTCIP, the Regional Arterial System is defined in SANDAG's most recent and adopted Regional Transportation Plan.
2. Each jurisdiction's program or mechanism shall be known as a "Funding Program." Local jurisdictions may choose to implement a Funding Program through a development impact fee program or other exactions from the private sector. In the event a jurisdiction(s) chooses to establish a development impact fee program to meet its Funding Program requirements, said program shall be consistent with Government Code Section 66000 et seq.

3. SANDAG will be responsible for producing the required nexus study to satisfy the requirements of California Government Code Section 66000 et seq. for Funding Programs utilizing a development impact fee.

Also see response to Comment B-1.

- B-7** As an implementing document of the General Plan, the UCSP relied on the General Plan traffic model which included the latest assumptions for local and regional land uses to account for the cumulative analysis. With regard to the Bayfront, the traffic analysis used the adopted land uses for the Bayfront Planning Area. As was concluded in the GPU EIR cumulative traffic analysis, the traffic impacts from the adopted Bayfront Planning Area comprise a worse case scenario when compared to those allowed in the proposed Bayfront Master Plan. This results from the fact that the potential land use pattern currently being considered for the Bayfront property removes intensive development from the Sweetwater District (formerly known as the Mid-Bayfront area) and places it in the central and southern portions of the Bayfront Planning Area. By moving this development out of the Sweetwater District, the most intensive development is moved further away from the sensitive San Diego Bay National Wildlife Refuge, thus reducing biological and visual impacts relative to the adopted plan. The proposed Bayfront Master Plan not only reduces the intensity of residential development in the Sweetwater District but by moving it to the central Harbor District, an area impacted and currently planned (in the adopted plan) for industrial and commercial uses, generates a more modest traffic scenario. As such, the currently adopted Bayfront plan, upon which the GPU and UCSP cumulative traffic analyses are based, can be considered to be more intense than the proposed Bayfront Master Plan; and thus cumulative traffic impacts are adequately accounted for.
- B-8** See response to Comment B-1 and B-6.
- B-9** This comment states that any work performed within Caltrans' right-of-way will require an encroachment permit. Future development will comply with this request.
- B-10** This comment states that early coordination with Caltrans is strongly advised for all encroachment permits. Future development will comply with this request.

DEPARTMENT OF CALIFORNIA HIGHWAY PATROL

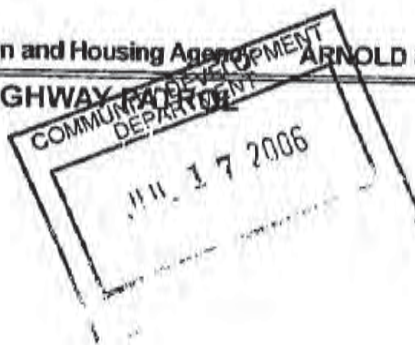
4902 Pacific Highway

San Diego, CA 92110

(619) 220-5492

(800) 735-2929 (TT/TDD)

(800) 735-2922 (Voice)



July 12, 2006

File No.: 645.06.12678.12790

Mr. Brian Sheehan
 City of Chula Vista
 276 Fourth Avenue
 Chula Vista, CA 91910

Dear Mr. Sheehan:

Re: Project SCH# 2005081121, Draft EIR, City of Chula Vista Urban Core Specific Plan

The San Diego Area Office of the California Highway Patrol has received a Draft Environmental Impact Report for the above entitled project. Because of our geographical proximity to the site, we have been asked by our Special Projects Section to assess traffic-related matters that may affect our area operations.

- C-1 We concur in the remarks of Mr. Mario H. Orso, Chief Development Review Branch, Department of Transportation, District 11, in his 09-30-05 response to your Notice of Preparation (NOP) for the above entitled project. "A proposed project has the potential to produce increased Average Daily Trips (ADT) and may potentially impact existing and future transportation facilities in the area (e.g., and associated on- and off-ramps)." We also believe the Sierra Club's 09-16-05 response to your NOP deserves consideration. "The current congestion on I-5 during daily rush hours must be considered when evaluating the effects likely to be caused by the addition of the Urban Core and the Bay front proposed retail, residential and commercial."
- C-2

- C-3 Your proposed plan is premised upon non-automotive transportation such as public transportation, cycling and increased pedestrian activity. In the event these underlying assumptions are not realized, we would appreciate being informed in sufficient time to undertake ambitious planning and action for any increased ADT on roadways within CHP jurisdiction.

We appreciate the opportunity to comment on your plan. If you have any questions regarding this letter and our comments, please contact Acting Lieutenant Mike Berger at (619) 220-5492.

Sincerely,

C. M. McGAGIN, Captain
 Commander
 San Diego Area

cc: Special Projects Section

Response to Letter C
California Department of Highway Patrol

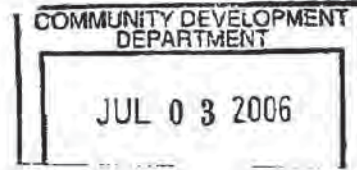
- C-1** See responses to Comment B-1. Section 5.8, Traffic, Circulation, and Access, of the DEIR addresses traffic impacts associated with implementation of the UCSP.
- C-2** See response to Comment B-7. Section 5.8, Traffic, Circulation, and Access and Section 6.0, Cumulative Impacts, of the DEIR address traffic impacts associated with implementation of the UCSP.
- C-3** This comment correctly states that the proposed Urban Core Specific Plan is premised upon non-automotive transportation such as public transportation, cycling, and increased pedestrian activity. However, a quantitative reduction in traffic based on non-automotive trips was not applied; therefore, projected traffic generation rates represent a worst-case traffic scenario. The comment requests that, in the event these underlying assumptions are not realized, the CHP be informed in sufficient time to undertake ambitious planning and action for any increased ADT on roadways within CHP jurisdiction. This comment does not address the adequacy of the EIR but will be forwarded to the appropriate City decision-making body for their consideration.

STATE OF CALIFORNIA

Brian Sheehan

ARNOLD SCHWARZENEGGER, Governor

PUBLIC UTILITIES COMMISSION

320 WEST 4TH STREET, SUITE 500
LOS ANGELES, CA 90013

June 29, 2006

Brian Sheehan
 City of Chula Vista
 276 Fourth Avenue
 Chula Vista, CA 91910

Dear Mr. Sheehan:

Re: SCH# 200581121; City of Chula Vista Urban Core Specific Plan

As the state agency responsible for rail safety within California, we recommend that any development projects planned adjacent or near the San Diego Trolley's Blue Line and BNSF Railway Company right-of-ways be planned with the safety of the rail corridor in mind. New developments may increase traffic volumes not only on streets and at intersections, but also at at-grade highway-rail crossings. This includes considering pedestrian circulation patterns/destinations with respect to railroad right-of-way.

Safety factors to consider include, but are not limited to, the planning for grade separations for major thoroughfares, improvements to existing at-grade highway-rail crossings due to increase in traffic volumes and appropriate fencing to limit the access of trespassers onto the railroad right-of-way.

The above-mentioned safety improvements should be considered when approval is sought for the new development. Working with Commission staff early in the conceptual design phase will help improve the safety to motorists and pedestrians in the County.

Please advise us on the status of the project. If you have any questions in this matter, please contact me at (213) 576-7078 or at rxm@cpuc.ca.gov.

Sincerely,


 Rosa Muñoz, PE
 Utilities Engineer
 Rail Crossings Engineering Section
 Consumer Protection & Safety Division

C: Andy Goddard, San Diego Trolley, Inc.
 John Shurson, BNSF

Response to Letter D
California Public Utilities Commission

- D-1** The letter requests that any development projects planned adjacent to or near the San Diego Trolley's Blue Line and BNSF Railway Company right-of-ways be planned with the safety of the rail corridor in mind. The issue of rail safety will be addressed at the project level by projects adjacent to or near the San Diego Trolley's Blue Line and BNSF Railway Company right-of-ways when approval is sought for the new development.



Sierra Club, San Diego Chapter
3820 Ray Street
San Diego, CA 92104

Administrative Assistant:
Martha Coffman 619-299-1743
mcoffman@sierraclubsandiego.org
Administrative & Volunteer Coordinator:
Cheryl Reiff 619-299-1741
creiff@sierraclubsandiego.org
www.sierraclubsandiego.org

RE: DEIR for the City of Chula Vista Urban Core Specific Plan EIR#06-01

7/6/06

Mr. Brian Sheehan
Senior Community Development Specialist
276 Fourth Avenue
Chula Vista, CA 91910
e-mail: bsheehan@ci.chula-vista.ca.us

Dear Mr. Sheehan:

The Sierra Club, San Diego Chapter, would like to make the following comments on the Draft Environmental Impact Report (DEIR) for the Urban Corps Specific Plan. We are

E-1 disappointed that the considerable physical negative effects to Aesthetics, Community Character, Traffic, and Air Pollution caused by a failure in the UCSP to deal with dislocation of existing residents (especially low, very low, and moderate income residents), provision of replacement housing immediately costing the same amount or less to rent, and quality jobs equal to or greater than the number of additional housing units to be generated have been dismissed as socio-

E-2 economic in nature and therefore not dealt with. As we pointed out in our comments to the NOP these are much more than socio-economic effects of the UCSP.

The increase in homeless individuals in the city has increased tremendously in the last

E-3 several years. This has a physical effect in urination in public areas, trash left in public areas, the visual impact upon residents, and a greater drain on public services (32 million cost to Scripps for treating uninsured, police time, cleaning public streets, vouchers and other programs, etc.).

E-4 Eliminating existing low cost housing will put more people on the street just as it did in San Diego. The UCSP needs to have a plan to prevent this, such as, a higher percentage of tax increments to affordable housing, requirement that developments of any size contribute toward affordable housing or preferably include affordable housing elements, etc. This lack in the plan will clearly create negative environmental effects to Community Character if these displaced persons become homeless or are forced to double and triple up with relatives and friends. The city will have to expend more than planned upon Public Services, since a larger number of people will be occupying each existing dwelling. We now have a very diverse population, if we

E-5 lose current residents to other areas it will change the character of the community. The UCSP promotes gentrification. It does not promote protecting the diversity that is a large part of western Chula Vista's character. Creating 7,000 plus new market rate homes is not adequate to mitigate the loss of the lower cost homes these homes will replace. There has to be previous or simultaneous provision of an equal number of comparably priced housing with the destruction of

E-6 any housing in order to avoid negative impacts to the environment (Community Character and Aesthetics). There is inadequate provision for this now in the UCSP so these areas have unmitigated negative environmental effects.

From 2000-2004 the city has built 15% more homes but only provided 5% more jobs.

E-7 This has put many people on the road, which has contributed to the traffic congestion and air

E-8 pollution the city is suffering from. The majority of the jobs that the UCSP will generate appear

- to be of the minimum wage variety. These jobs increase the number of people at the low and very low-income levels needed to fill them. They will either have to live here or commute from other areas exasperating Traffic and Air Pollution problems or requiring more affordable housing and public services than currently exist. This is a huge negative impact.
- E-9 <http://onlinecpi.org/publications.html> ("Left Behind" "Hidden Costs")
- E-10 There is a contradiction in the EIR when under Energy there is an attempt to suggest the city's encouragement of sustainable building practices will have some effect in mitigating the irreversible unmitigatable negative environmental impacts to Energy, but under Air Pollution and Noise there is a suggestion that homes be placed in areas (close to freeways) where the only way to bring the impacts down to a mitigatable level is to make the windows so they can not be opened and provide a ventilation or air conditioning system. This is the exact opposite of
- E-11 sustainable building practices! Also encouraging by giving a density bonus is counterproductive. Increased density would require more energy, water, public services etc. this would increase negative environmental effects instead of mitigating them. The only way sustainable building
- E-12 practices can be used as mitigation of energy is if they are mandatory. The UCSP should say any project to be approved MUST meet the challenge of Architecture 2030 (<http://www.architecture2030.org>), which would reduce its carbon output by 50%. It is ridiculous that the city requires more of itself than it does of developers. All the standards the city applies toward the few city built building should apply to anything built in the city in order to mitigate
- E-13 for Air Pollution and Energy. Not requiring a high standard is itself an irreversible Cumulative Negative Impact since the energy lost and the carbon put in the air is irretrievable.
- E-14 Water Quality is another area where the mitigations proposed are inadequate. The new draft Storm Water Plan calls for all parking lots to be biofilters. All sidewalks and driveways should be made of permeable substances. The increase in FAR would indicate that a higher percentage of the surface areas will be paved than now are, so even though the UCSP is
- E-15 redeveloping an existing urban area there will be an increase in run-off without mandatory biofiltering, swales, filters on roof drains, filters in storm drains, and retention basins (perhaps underground) to clean and slow run-off and increase percolation into the ground. There has to be a requirement for yearly inspections and maintenance of all filters and basins. Without these
- E-16 mandatory, enforced inspections requiring these devices will have no effect upon urban run-off. In fact unmaintained they may actually make the situation worse. The EIR needs to deal with the maintenance issue or not consider any of these devices adequate mitigation. They only work if they are maintained. Developers leave, and HOA's do not have the expertise, nor generally the
- E-17 desire to raise their fees. The city needs to take on this responsibility as part of a Maintenance Assessment District.
- E-18 In Attachment 2 page 3 the chart shows no winter emissions from fireplaces. How can this be when so many homes have fireplaces? Will there be a regulation that none of the new homes to be built will have wood burning fireplaces? This actually would help Air Quality, but we did not see it mentioned just the curious notation in the table.
- E-19 Parking is still inadequate. One space per dwelling at transit focus area is not enough unless there is some way to mandate that people will not have cars, and 1.5 in other areas is also inadequate. We have numerous streets that are always clogged with cars because the homes have inadequate parking. Adding 7,000 new homes with these inadequate spaces is just asking for worse problems. The one space per 10 residents for guests would be full of residents' cars every
- E-20 night. The suggestion that builders be allowed to pay in lieu of fees instead of providing parking
- E-21 is totally unacceptable. How can shared parking even be considered when the UCSP is promoting 24-hour use of the area? It is true that this is acknowledged as an unmitigated negative effect, but that is not going to make life bearable for the people who will live here in the future.
- In regard to Hazards/Risks of Upsets the EIR does a very thorough job of documenting the 103 sites in the urban core that qualify as potential environmental hazards. There also seems to be a very high number of leaking tanks. Considering the proximity to the

- E-22 Bay, it would seem that the UCSP should have a specific plan for maximizing the health and safety of residents and remediation of these hazards. The tanks are certainly a threat to Water Quality and digging in the ground anywhere near them is likely to exacerbate the problem. It is mentioned that precautions will be taken whenever any of these sites are redeveloped, but a better mitigation would be a proactive community benefits agreement for all development to maximize the health of the residents. <http://www.preventioninstitute.org/builtenv.html#pdfs> lists many excellent ways of transforming neighborhoods to healthier places for the residents. The city has made a commitment in the General Plan to HEAC. This is the time to start implementing concrete actions. The EIR should consider these mitigations instead of just avoiding the possible hazards.

- E-24 There is no discussion of cumulative impacts because it is maintained that this was covered in the EIR for the GPU. However, we feel the treatment in that document was inadequate because it lacked a thorough treatment of the effects of the considerable construction now occurring in Tijuana, the huge increases projected for truck traffic at the border crossings (all of which must pass through Chula Vista to get further north), the projected development in South San Diego and Otay Mesa, the projects under way in eastern Chula Vista (as listed in EIR for Otay Ranch, villages 2/3 and part of 4), and even the projects already under considered for western Chula Vista.

Sincerely,

Theresa Acerro
Landuse Committee Member
San Diego Chapter
Sierra Club

Ellen Shiveley
Conservation Chair
San Diego Chapter
Sierra Club

Response to Letter E Sierra Club

E-1 This comment suggests that physical effects would result from the displacement of low-income people. Analyses of the physical effects of Plan implementation on community character, aesthetics, traffic, and air quality are addressed in the DEIR in Chapters 5.1 Land Use, 5.2 Landform/Aesthetics, 5.8 Traffic, Circulation, and Access, and 5.10 Air Quality. The environmental effects of implementing the Urban Core Specific Plan to local and regional population and housing are addressed in Chapter 5.6 of the DEIR. Assessment of population and housing environmental impacts was limited to physical changes in the environment, in accordance with Section 15131 of the CEQA Guidelines. The DEIR did not address socioeconomic effects of project implementation. While the CEQA Guidelines indicate that socioeconomic effects can be used to determine the significance of an impact, they are not to be considered as an environmental effect.

The factor for consideration, as noted in the comment, is whether a socio-economic issue would result in a physical effect on the environment. The DEIR based consideration of this issue on the criteria specified in Section 5.6 Population and Housing of this DEIR. These criteria, based on Appendix G of the CEQA guidelines include:

Criterion 1: Induces substantial population growth in an area, either directly or indirectly;

Criterion 2: Displaces substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere;

Criterion 3: Displaces substantial numbers of people, necessitating the construction of replacement housing elsewhere.

Section 5.6 indicated that there may be temporary displacement of population as a result of the implementation of the specific plan. Consistent with Appendix G of the CEQA guidelines, the analysis of these criteria centered on whether displacement of the population would require construction of housing elsewhere. The EIR concluded that because 10,800 residential units would be permitted as a result of the proposed project, 7,100 units more than currently exist, additional housing would not have to be constructed elsewhere. Also, as noted in the DEIR approximately 70 percent of the UCSP Subdistricts Area encompasses areas currently zoned for, and developed with commercial and/or office uses thus not affecting existing housing stock. Since housing would not need to be constructed elsewhere, there would not be a physical change resulting from that construction and the DEIR concluded that the temporary impact was not significant. Please

note that the proposed revisions to the Public Review Draft UCSP include a recommendation that the five parcels currently developed and zoned for Mobile Home Parks not be rezoned at this time, thereby further reducing any temporary displacement impacts on existing housing stock.

As stated in Section 5.6, the City's inclusionary housing requirement would apply to future projects that meet the size threshold. Therefore, the new units would not only be market rate but would also include affordable housing units with appropriate affordability and term restrictions. Because the UCSP is a long range zoning document it does not set affordability levels or pricing indexes for future units.

See also responses to Comments E-3, E-6, and J-27.

E-2 This comment comprises a repeat of a comment made in the Sierra Club's response to the project NOP. Comments related to environmental effects identified in the NOP have been considered in the preparation of the DEIR. Section 5.6 of the DEIR addresses issues related to Population and Housing. See also responses to Comments E-1 and E-3.

E-3 This comment suggests that implementation of the Urban Core Specific Plan will increase the number of homeless individuals in the city, through displacement of affordable housing, and generate the resulting physical effects of urination in public, trash in public areas, visual impacts upon residents, and a greater drain on public services (police, street cleaning, healthcare costs, etc).

Visual and public services impacts are addressed in the DEIR in Sections 5.2.3 and 5.11, respectively. As presented in those sections, implementation of the proposed Plan would generate potentially significant visual and public services impacts and appropriate mitigation is thus included in the DEIR to ensure that impacts are reduced to below a level of significance. As responded to in Comment E-1, an evaluation of the significance of population and housing displacement impacts was based on criteria contained in the CEQA Guidelines Appendix G, and restated in the DEIR in Section 5.6.2. Based on these criteria, it was concluded that the temporary displacement of people would not result in a significant impact. See also response to Comment E-6.

E-4 This comment states that the Urban Core Specific Plan needs to have a plan to prevent the loss of affordable housing. The provision of affordable housing is a policy better aligned with the City's Housing Element. Section 5.6 of the DEIR includes a summary of the relevant goals and objectives in the current and proposed update to the Housing Element. In addition, Section 5.6.1(b) describes the Inclusionary Housing policies. These policies would be considered, as applicable, to new development. Further, this comment addresses the proposed

Plan itself, not the adequacy of the DEIR, and will be forwarded to City decision makers for their consideration.

- E-5** This comment suggests that implementation of the Urban Core Specific Plan will result in the loss of current residents to other areas subsequently changing the character of the community.

Changes to community character resulting from implementation of the Plan are analyzed in Section 5.1.3.3 of the DEIR. Environmental effects resulting from change in community character were determined not to be significant based on an evaluation in accordance with CEQA Guidelines Appendix G threshold IX (a) which states that a project would create significant community character effects if it would "physically divide <or adversely affect the community character of> an established community." The analysis concluded that the proposed Plan would not divide the existing community but would in fact integrate disparate land uses within the UCSP area. The analysis additionally concluded that while implementation of the proposed Plan would create a substantially different community character than the one that currently exists (as a result of land use intensification and the integration of residential uses throughout the existing commercial areas), these changes would not be adverse because the Plan emphasizes smart growth principles and the incorporation of quality private and public development design guidelines which mitigate any adverse effects (pages 5-41 and 5-42). See also response to Comment E-4.

- E-6** This comment states that the creation of 7,100 new market rate homes (as allowed in the Plan) is not adequate to mitigate the loss of lower cost homes and that "there has to be previous or simultaneous provision of an equal number of comparably priced housing with the destruction of any housing in order to avoid negative impacts to the environment."

As stated in responses to Comments E-1, E-3, and E-5, the DEIR evaluated the environmental effects of the proposed project on population and housing in accordance with the appropriate CEQA thresholds of significance which do not contain criteria of affordability. The UCSP correctly contemplates production of housing but does not assign income levels to those units. In regard to housing affordability however, it should be noted that the majority (about 70 percent) of the UCSP Subdistricts Area, where future development is expected to occur, is within a designated redevelopment plan area. California redevelopment law requires that at least 15 percent of all new and substantially rehabilitated dwellings within designated redevelopment plan areas be available at affordable housing costs to, and occupied by, persons and families of low to moderate income. In addition, whenever low and moderate-income peoples' housing units are destroyed within designated redevelopment project areas, replacement units must be made available at an affordable cost for the same income level as that

household that was displaced. This information is contained in the text of the DEIR in Section 5.1.6.3.b, page 5-123/124. California redevelopment law also requires that 20 percent of the tax increment generated by new development be "set-aside" and utilized for the provision of affordable housing.

- E-7** This comment states the City has built 15 percent more homes but only provided 5 percent more jobs in the period from 2000-2004 and this has resulted in traffic congestion and air pollution.

A primary objective of the UCSP is to encourage growth anticipated in the City to locate in the project area, closer to existing employment opportunities and regional serving transit, in order to reduce the traffic congestion and air quality impacts that would occur if development were to occur elsewhere in the City. Impacts related to traffic congestion and air pollution are addressed in Chapters 5.8 Traffic, Circulation, and Access, and 5.10 Air Quality of the DEIR.

- E-8** Please see response to Comment E-7.

- E-9** The comment states the UCSP generates mostly minimum-wage employment opportunities resulting in additional low-income residents and commuters needed to fill them along with related impacts to traffic congestion, air pollution and housing.

Although this comment primarily expresses a concern regarding the potential employment opportunities created by the UCSP and not the adequacy of the DEIR, a primary objective of the UCSP is to encourage growth anticipated in the city to locate in the project area, closer to existing employment opportunities and regional serving transit, in order to reduce the traffic congestion and air quality impacts that would occur if development were to occur elsewhere in the city. Impacts related to traffic congestion and air pollution are addressed in Chapters 5.8 Traffic, Circulation, and Access, and 5.10 Air Quality of the DEIR. Please also see response to Comment E-7.

The affordability of new housing that may be developed in the project area in the future is dependent on future conditions and a variety of factors that are beyond the scope of the DEIR. The UCSP provides development regulations and design guidelines that are intended to accommodate a substantial increase in the number of housing units presently available in the project area and to foster the development of a wide range and variety of types of housing in the project area. As discussed in Section 5.6.1.3 of the DEIR, the General Plan encourages the development of housing for all income categories. Section 5.6.1.3.b of the DEIR discusses the fact that portions of the project area are within a redevelopment zone in which at least 15 percent of all new and substantially rehabilitated dwelling units must be available at affordable prices to low- and moderate-

income households and any such units proposed for demolition must be replaced at an affordable cost for the same income level. Section 5.6.2 of the DEIR also indicates that future proposals for the development of housing units in the project area will be evaluated for consistency with state law and General Plan goals and objectives for affordable housing. To the extent allowed by law and consistent with the General Plan, one factor the City will consider with respect to future proposals for residential development in the UCSP area is whether a proposed project promotes or achieves the General Plan objectives for affordable housing.

- E-10** This comment states that there is a conflict in the DEIR and Plan between the encouragement of sustainable building practices to reduce energy impacts and the provisions that windows be closed and air ventilation systems be installed to reduce noise and air quality impacts.

Green building incentives are available to all development within all areas of the Urban Core Specific Plan Subdistricts Area, while recommendations for attenuating freeway noise and diesel particulate emissions are applicable only to residential areas adjacent to Interstate 5. Provisions for both in the Plan itself and in the DEIR are thus not considered to be contradictory when considering energy use and efficiency patterns for the project as a whole. The requirement that buildings be designed to permit the windows to remain closed in order to provide a quiet interior does not require that the occupant leave the windows closed, but simply to insure that the occupant has that option.

- E-11** This comment states that the UCSP and DEIR encouragement of sustainable building design through increased density bonuses is counterproductive to the benefits of sustainable design.

According to the *Resource Guide for Sustainable Development*, green buildings require modifications to the standard development pro-forma in order to achieve a higher-level of energy performance. Outside incentives such as density bonuses make-up only one piece of the economic criteria considered when developing buildings. Green building incentive programs and sustainable design guidelines have been developed and are being tested to demonstrate convincingly that ecological design features can be successfully applied in urban settings.

The UCSP is recommending a market based, incentive approach over mandatory requirements to encourage green building technology. The proposed green building incentive program (Chapter VI-51) and sustainability design guidelines (Chapter VII-123) in the UCSP are not included as mitigation measures in the DEIR, but instead are noted in the impact analysis as elements of an energy consumption reduction strategy for the Urban Core. With the support of the recently established National Energy Center for Sustainable

Communities, the City in partnership with private developers, will demonstrate building performance and community sustainability improvements that are specific to the geographic and climactic conditions of the Urban Core. Having demonstrated the economic and market feasibility of these practices in an urban setting, the City may look to further enhance the incentive program as well as require more stringent performance measures.

According to the April 2005 *Zoning Practice*, published by the American Planning Association, and the U.S. Green Building Council website at <http://www.usgbc.org>, zoning incentives for green buildings typically include density bonuses and are not counterproductive in terms of resource consumption. The impacts associated with increasing density through high-performance building standards place fewer incremental energy demands per square foot of buildable area (e.g., demands on energy, water, and public services) when compared to traditional building practices. In fact, the purpose of the proposed green building incentive program is to encourage the demonstration of building design, construction techniques, and technologies that promote the wiser use of resources (e.g., cradle-to-cradle materials use, closed-loop resource consumption systems). Through the green building incentive program, the City ultimately will provide for a greater number of users that are served by an increasingly limited pool of resources.

- E-12** This comment states that "the only way sustainable building practices can be used as mitigation of energy is if they are mandatory." The DEIR does not identify sustainable building practices as mitigation. These practices are addressed as special guidelines that provide for increased density if these practices are employed. See also response to E-11.
- E-13** Air quality impacts are addressed in Section 5.10 and energy impacts in Section 5.12.4 of the DEIR. In accordance with City protocols, the air quality standards recommended by the South Coast Air Quality Management District, and the San Diego Air Pollution Control District were employed. Energy criteria was based on the threshold used in the EIR for the General Plan Update.
- E-14** This comment states that the Draft/Tentative Municipal Stormwater Order currently going through a public review process, requires that "parking lots be biofilters and all sidewalks and driveways (be constructed) of permeable surfaces."

Specific to the comment quoted above, there is no specific provision within the Tentative Order requiring "parking lots to act as biofilters and that all sidewalks and driveways be constructed of permeable surfaces." There are however requirements for new development, including site design requirements (see page 18, Section D.1.d (4)), as well as provisions for a requirement of yearly

inspections and maintenance of all filters and basins. The prescriptive nature of these requirements have been received by the San Diego Regional Water Quality Control Board, and it may be anticipated that this will be revised somewhat in the subsequent re-release of the Tentative Order. Subsequent development projects would be required to comply with the Municipal Stormwater Order, in effect at the time of project review. Maintenance of storm drain systems within the public right-of-way or Community Facility Districts is the responsibility of the City of Chula Vista Public Works Department. Private storm drain systems are maintained by, and at the expense of, the property owners.

- E-15** Project impacts to water quality are addressed in the DEIR in Section 5.7.3.1. As presented on pages 5-136 through 5-138 of the DEIR, project implementation would result in significant long-term operational and short-term construction impacts to water quality. To reduce significant water quality impacts to below significance the DEIR incorporates water quality Mitigation Measures 5.7-1 through 5.7-4, as described on pages 5-141/142. Adherence to mandatory existing local, state, and federal regulations governing runoff and drainage will provide sufficient protections against potential hydrology and water quality impacts; and the mitigation measures provided in the DEIR restate these obligations as conditions of approval for all subsequent development projects.
- E-16** Maintenance of storm drain systems within the public right-of-way or Community Facility Districts is the responsibility of the City of Chula Vista Public Works Department. Private storm drain systems are maintained by, and at the expense of, the property owners. Maintenance of on-site storm drain systems, including filters and basins, is typically required of site-specific developments as a condition of approval. The City's Public Works Department is responsible for overseeing the monitoring of the NPDES permit requirements as set forth in existing mandatory federal, state, and local regulations governing runoff and drainage.
- E-17** See responses to Comments E-14 and E-16 above.
- E-18** This comment appears to refer to Attachment 3 of Appendix E, rather than Attachment 2. The air quality analysis considered that, because of the multistory nature of the residential units proposed in the Plan, the number of wood burning stoves and wood burning fireplaces would be minimal and not contribute substantially to project air emissions. Gas burning fireplaces are accounted for in the URBEMIS modeling process. URBEMIS stands for "Urban Emissions Model" and was developed by the California Air Resources Board (CARB) as a modeling tool to assist local public agencies with estimating air quality impacts from land use projects when preparing a CEQA environmental analysis. The model was developed as a user-friendly computer program that estimates construction, area source, and operational air pollution emissions from a wide variety of land use

development projects in California, such as residential neighborhoods, shopping centers, office buildings, etc.

- E-19** The current residential parking standards for multi-family units are 1.5 space per unit for studio and one bedroom units; and 2 spaces per dwelling unit for 2 or more bedroom units. The Chula Vista Municipal Code does not currently have a guest parking requirement. The UCSP proposes a uniform minimum residential requirement of 1.5 spaces per dwelling unit and 1 space per 10 units for guests (10 percent). Therefore, in some cases the UCSP proposes minimum residential parking requirements that exceed current City requirements for higher density residential development zones (R3). These standards are minimum and may be exceeded at the discretion of project applicants as long as not to the detriment of high quality site design and other UCSP objectives such as creating walkable communities and promoting other modes of mobility.
- E-20** The comment states that "the suggestion that builders be allowed to pay in lieu fees instead of providing parking [referenced in the DEIR on page 5-190] is unacceptable."

A primary objective of the UCSP is to encourage growth anticipated in the city to locate in the project area in order to reduce the traffic congestion and air quality impacts that would occur if development were to occur elsewhere in the city. Mitigation Measure 5.8.5-5 of the DEIR requires that "Subsequent development projects shall comply with the parking standards set forth in the UCSP development regulations and design guidelines for the type and intensity of development proposed." Throughout the city, parking requirements may be met where found to be consistent with the existing In Lieu Fee program as described in Chula Vista Municipal Code section 19.62.040. This program is particularly applicable in an urban setting: where proposed nonresidential uses lie within the boundary of a parking district, off-street parking requirements shall be considered to be met; and provided, that any developer of a new commercial building within a parking district, or a developer of a commercial addition to an existing building therein, shall pay the required fee(s).

Furthermore, as stated in section 14.12 of the *Practice Under the California Environmental Quality Act* (November 2005) published by the Continuing Education of the California Bar, payment of fees as mitigation is an appropriate form of mitigation when it is linked to a specific mitigation program. Fee-based mitigation programs based on fair-share contributions by individual projects are considered adequate mitigation if they are part of a reasonable plan of actual mitigation that the relevant agency commits itself to implementing. The existing In Lieu Fee program of the Municipal Code is a defined program that includes implementing measures.

Please also see response to Comment E-7.

- E-21** The comment states that shared parking should not be permitted by the UCSP and that this is acknowledged by the UCSP as an unmitigated negative effect.

As identified in section 5.8.3.5 of the DEIR, shared parking arrangements must be assured in perpetuity and accessible via a public pedestrian path. Section 5.8.6 also concludes that potential significant impacts to parking would be reduced to below significance by the incorporation of development regulations and design guidelines as part of the UCSP. As such, parking is not identified as having an unmitigated negative effect. Further, the total hourly use of an area does not affect the applicability of shared parking. Rather, the potential benefit from shared parking results from different uses in an area requiring parking at different times of the day. In an urban area where the uses occur over a 24-hour period, there is greater opportunity for shared parking opportunities to be successful.

- E-22** As described in the DEIR Section 5.7.1.1 Area Hydrology, San Diego Bay lies approximately one and one-half miles west of the west boundary of the UCSP. The underground storage tanks identified in Section 5.13.1 are already subject to permitting, inspection, release containment, and remediation protocol through existing mandatory local, state, and federal regulatory agencies. Inclusion of a hazardous materials management plan, as this comment suggests, would not be necessary to accomplish the goal of protecting the health and safety of Urban Core residents. In addition, see also responses to Comments A-2, A-3, and A-5 above.

- E-23** This comment makes a recommendation but does not address the adequacy of the DEIR. The comment is hereby noted and will be forwarded to the appropriate City decision makers for their consideration.

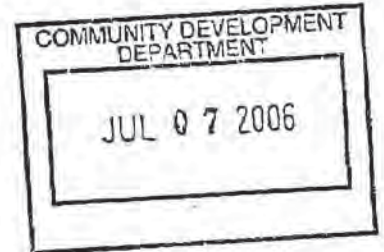
- E-24** The DEIR for the Urban Core Specific Plan contains an analysis of cumulative impacts in Chapter 6.0 which is largely based upon the cumulative impacts analysis conducted for the GPU EIR which assumed buildout through the year 2030. To the extent that environmental conditions are a result of contributions from Mexico, they are included in the baseline on which the cumulative impact analysis is based. For example, traffic volumes on area roads do not distinguish between vehicle trips originating in the United States or Mexico. As such, modeled conditions reflect contributions from both countries. See also responses to Comments B-2, B-7, and C-2.



San Diego County Archaeological Society, Inc.

Environmental Review Committee

5 July 2006



To: Mr. Brian Sheehan
Senior Community Development Specialist
City of Chula Vista
276 Fourth Avenue
Chula Vista, California 91910

Subject: Draft Environmental Impact Report
Urban Core Specific Plan

Dear Mr. Sheehan:

I have reviewed the cultural resources aspects of the subject DEIR on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in the DEIR, we have the following comments regarding archaeological resources:

1. While most proposed projects will be on the various parcels in the UCSP area, it needs to be kept in mind that archaeological resources may exist under streets as well.
F-1 Archaeological monitoring is also appropriate for projects such as water and sewer lines.
2. Section 5.3.3.2, "Impacts to Archaeological Resources", in Criterion 2, provides a good synopsis of the required approach to treatment of archaeological resources, including citation of the State's *Guidelines for the Curation of Archaeological Collections*. However, mitigation measure 5.3.5-5, in Section 5.3.5.2, does not benefit from that. We would urge that 5.3.5-5 be rewritten to include the intended requirements, to ensure that they are not overlooked. For example, 5.3.3.2 states that "Once encountered, historic artifacts associated with an archaeological feature or deposit are required to be documented in place...", but 5.3.5-5 does not include these requirements.
F-2
3. In the above-quoted text from Section 5.3.5.2, we suggest that "historic artifacts associated with" be changed to "artifacts associated with", to avoid any possible misinterpretation that the requirement applies to artifacts regardless of the time period with which they are associated.
F-3
4. Regarding architectural resources, it needs to be kept in mind that any evaluation of the built environment is a snapshot at that particular time, while the 50 year threshold for significance under CEQA is a moving criterion. In fact, the normal practice to use a threshold of 45 years for impact analysis under CEQA is largely to avoid ignoring resources that may reach the 50
F-4

years mark between the initial application and approval and implementation. Accordingly, structures that may not have made the cut for the 2005 review might have become significant by, say, 2010. This can be either due simply to the age passing the required threshold, or to the changing view of who or what is historically significant.

Thank you for affording SDCAS this opportunity to provide our comments on this environmental document.

Sincerely,


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

cc: SDCAS President
File

Response to Letter F
San Diego County Archaeological Society, Inc.

- F-1** Mitigation Measure 5.3.5-5 in the DEIR requires archaeological monitoring prior to project construction and is not restricted to residential, commercial or mixed-use projects. In addition, capital improvement projects such as water and sewer improvements will also be subject to subsequent CEQA review.
- F-2** Mitigation Measure 5.3.5.5 has been rewritten to include an additional bullet point prior to the last which reads: "Once encountered, ~~historic~~-artifacts associated with an archaeological feature or deposit are required to be documented in place, analyzed in a laboratory setting and prepared for curation in accordance with CEQA provisions and local guidelines."
- F-3** The text in the DEIR referred to in this comment has been revised per the following: "Once encountered, ~~historic~~-artifacts associated with an archaeological feature or deposit are required to be documented in place, ..."
- F-4** This comment does not address the adequacy of the DEIR and will be forwarded to City decision makers for their consideration.



July 12, 2006

Ms. JoAnn Hadfield
THE PLANNING CENTER
1580 Metro Drive
Costa Mesa, CA 92626

**Subject: City of Chula Vista Urban Core Specific Plan (UCSP) Draft
Environmental Impact Report (DEIR) Peer Review**

Dear Ms. Hadfield:

Urban Crossroads Inc. is please to provide this peer review of the City of Chula Vista Urban Core DEIR and supporting appendices (traffic study report by Kimley-Horn and Associates dated April, 2006). The DEIR and supporting study evaluate existing and future 2030 conditions and potential impacts with respect to the proposed Urban Core Specific Plan.

Key concerns include:

- G-1 • The lack of information regarding the existing parking requirements that are proposed to be superseded by the proposed UCSP parking requirements. The potential for a significant impact to parking availability within the Urban Core area has possibly been ignored based on the lack of information presented.

- G-2 • Similarly, the lack of any existing parking utilization data renders it impossible to determine whether or not the proposed parking supply is adequate to serve the proposed increases in land use intensity within the Urban Core area.

- G-3 • The discrepancies between the DEIR and the supporting traffic study in the appendices to the DEIR regarding the forecasting methodology that was used to determine 2030 traffic volumes. The DEIR refers to a manual factoring process, while the supporting traffic study refers to the regional travel demand model maintained by the San Diego Association of Governments (SANDAG).
- G-4 • Regardless of the forecasting methodology that was actually applied, inadequate information regarding the traffic volume forecasting input data and resulting output information is presented in the environmental document. The DEIR implies that project has been disaggregated to a total of 26 distinct subareas, but no project trip generation data for is provided in the DEIR.
- G-5 • Insufficient information about existing and future (2030) transit utilization is presented in the DEIR. The increases in transit utilization and the resulting affect on vehicular traffic should be expanded substantially to allow a reasonable review of the DEIR with respect to the traffic and mobility findings and conclusions.
- G-6 • Growth in traffic related to residential and office uses appears to be represented in a manner proportional to the growth in actual use. However, the growth in traffic related to retail use is only 60%, while the quantity of retail use is projected to increase by 74%. This discrepancy is explained by a footnote indicating that 650,000 square feet of the proposed retail use (50% of the visitor serving retail use) is assumed to consist of hotels. Although the same footnote references the document Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region, review of this document indicates that no trip rate based on square footage of hotel uses is included in this reference document. Any conversion of square footage to number of hotel rooms or other explanatory variable should be documented in the DEIR.

- G-7 • The roadway capacities cited in the traffic study report indicate that the Urban Core roadways are expected to achieve capacities in excess of typical arterial roadways with the same number of lane elsewhere in the City. This is an unreasonable assumption, as the Urban Core roadways are characterized by reduced lane widths and increased levels of transit, pedestrian, and bicycle activity. All of the factors have been shown to reduce roadway capacity, not increase roadway capacity. The Highway Capacity Manual is cited as the basis of the analysis in the DEIR. These capacity reducing factors should be explicitly included in the analysis, but it does not appear that this is the case.
- G-8 • The DEIR also asserts that "peak hour spreading" will occur in the Urban Core area. No data is presented to support this assumption. Since it is stated that level of service (LOS) "D" is the target that will be maintained for the vast majority of the study area intersections and all of the Urban Core roadway segments, it is not reasonable per the reasoning in the DEIR to assume that levels of congestion will occur that would in fact result in peak hour spreading.
- G-9 • The definition of a significant impact cited in the DEIR includes a requirement that the project cause a five % increase in traffic to result in a significant project impact. This definition is based on a ratio approach that has been increasingly criticized for lack of responsiveness to potential service level changes on roadways that are already heavily traveled.
- G-10 • No information regarding future parking demand and capacity is presented in the DEIR. This lack of information makes it impossible to determine whether or not a significant parking impact should also have been identified. Based on the reduced parking requirements for both residents and guests, as well as the reduced parking requirements for non-residential uses, it is likely that a significant parking impact should also have been identified.

Ms. Joann Hadfield
THE PLANNING CENTER
July 12, 2006
Page 4

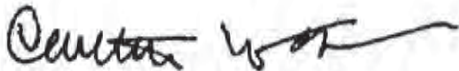
SUMMARY

G-11 Based upon our review, it appears that the DEIR is correct in finding that significant and unavoidable adverse impacts will occur. The DEIR, however, neglects to fully disclose traffic and parking forecasting data and analysis inputs/outputs.

Urban Crossroads, Inc. is pleased to provide this review of the Chula Vista Urban Core Specific Plan Draft Environmental Impact Report. Please feel free to contact me at (949) 660-1994 x210 if you have any questions regarding our review of this study.

Sincerely,

URBAN CROSSROADS, INC.



Carleton Waters, P.E.
Principal

CW:cg
JN:04061-02

Response to Letter G Urban Crossroads

- G-1** The City has proposed minimum parking requirements that in some cases meet or exceed current City requirements for similar development types and while the DEIR does not identify the City's existing parking requirements, the DEIR does address the provision of adequate parking supply through the development regulations contained in Chapter VII of the UCSP which require that minimum parking be provided for all development types.

It is important to note that in addition to autos, the proposed Urban Core Specific Plan recognizes and promotes a diversity of transportation mobility options in the Urban Core. Chapter 5 of the proposed UCSP contains a comprehensive view of transportation modes beginning with a detailed description of pedestrian facilities. Bicycle facilities are also shown along with cross-section views of the major streets located throughout the urban core. Improved pedestrian and bicycle movement is a critical component of the UCSP, and enhancements to these facilities are a goal of the UCSP. In addition, the proposed plan describes the transit network and potential future improvements, including Bus Rapid Transit (BRT), that were developed in collaboration with staff from SANDAG. Finally, Chapter 5 also includes a discussion of parking, goals, and policies.

See also response to Comment E-19.

- G-2** Parking supply and demand management is a function of the City's parking management strategy for the Urban Core. Although the DEIR does not identify the City's existing rate of parking utilization, the DEIR does address the provision of adequate parking supply through the development regulations contained in Chapter 7 of the UCSP which require that minimum parking be provided for all development types.

See also response to Comments E-19 and G-1.

- G-3** There is no discrepancy between the traffic study and the DEIR. There were two methods utilized in generating traffic from the project site, as is typically done with large, complex projects. The first method uses the SANDAG Tranplan regional model, which utilizes the most up-to-date land use and roadway assumptions in its database. The City of Chula Vista has worked closely with SANDAG to incorporate the most up-to-date land use assumptions for the region as a whole. The modeling effort for this project, which was developed in a two-year process, provides a reasonable estimate of future patterns. The assumptions are based on SANDAG's Regional Transportation Plan and the reasonably expected revenue scenario. This model is used to generate traffic volumes in the Year 2030, which is SANDAG's study horizon year. The model

generates 24-hour volumes on roadways but does not generate peak hour volumes at intersections. Peak hour volumes for intersection analysis must be generated manually by factoring existing volumes with an appropriate amount as determined by the SANDAG model.

G-4 The input for the model used the same land use and roadway network as in the updated General Plan. This model is then used to determine daily volumes on streets located within the urban core without regard to the 26 distinct subdistricts. The model utilizes Traffic Analysis Zones to manage land use data and is set up with the appropriate roadway network for modeling purposes. As shown in Table 4-2 of the traffic study, there would be a net increase of 141,000 ADT with the development of the Urban Core.

G-5 The Urban Core traffic study assumed the same transit network as shown in the recently adopted General Plan Update. The travel demand forecasted for the Urban Core traffic study was the same as that forecast for the General Plan's traffic study. The Urban Core traffic report contains the results of roadway segment analysis assuming implementation of the Regional Transit Vision (RTV). The results of the roadway segment analysis from the General Plan found that the RTV scenario would reduce 24-hour traffic volumes by a nominal amount (about 500 vehicles per day; less than one percent) on H Street between I-5 and Broadway.

Although transit is coded into the regional model, SANDAG is switching traffic models this year in their attempt to gain a better understanding of the impacts of Light Rail and Bus Rapid Transit routes on local roads. In short, the best information available, at the time the EIR was prepared, was analyzed. Even though the decline in volume percentages are small, when looked at region wide, volume reductions do accumulate. The Urban Core Specific Plan and the General Plan are predicated on using multiple modes and a variety transportation facilities and the future impacts of such multi-modal usage on local street traffic volumes was determined.

G-6 SANDAG does not provide trip generation rates for hotel land uses in terms of square footage. Rather, SANDAG provides this rate in terms of occupied hotel rooms. Because the project description gave hotel demand in square footage, these figures required conversion to occupied hotel rooms for peak hour analysis. The number of hotel rooms was estimated by converting half of the area related to visitor commercial space to occupied hotel rooms by the equation - 1,000 sf = 1 occupied hotel room (includes ancillary space within the building envelope, e.g., lobby, elevators, common areas).

G-7 Segments of Third Avenue would be reduced as part of the project to accommodate increased levels of pedestrian and bicycle activities. However, the

majority of the other segments in the Urban Core would not necessarily have a lower capacity as current lane widths have been maintained to accommodate wider vehicles such as those used in bus rapid transit corridors. Roadway capacities for the different types of roadways in the urban core were created to more accurately reflect the operations of each respective roadway segment. Please see response to Comment N-6.

Third Avenue is discussed separately in the Urban Core DEIR because the project specifically describes Third Avenue as a two-lane roadway when in fact, it could have been upsized to four lanes if only 24-hour vehicle volumes were considered. However, a major objective of the UCSP is to improve pedestrian and bicycle access to the heart of the Village District along Third Avenue. More specifically, Third Avenue between E and G Streets is targeted for improved pedestrian amenities such as wider sidewalks, bulbouts, lighting, signage, and furniture. To accomplish this improved level of service for pedestrians, the street would be narrowed to two lanes. This improvement is entirely consistent with and established by the General Plan's Urban Core Circulation Element in Chapter 5 of the "Land Use and Transportation Element." The chapter describes what the City envisioned for the northwest portion of the City and how it arrived at new classifications for the Urban Core street network.

The Highway Capacity Manual is the industry standard for analyzing all types of traffic facilities. Improved levels of service for pedestrian, bicycle, and transit improve the total trip carrying capacity of the corridor as opposed to simply improving single-occupancy vehicle capacity. Focusing solely on the vehicle capacity of a roadway is contrary to the concept of smart growth and Transit Oriented Design which are major objectives of the UCSP and General Plan.

- G-8** Peak-hour spreading is defined as the peak traffic volumes extending past the peak period since the intersection cannot accommodate the higher traffic volumes and some of the traffic would be spread or extended into the next time period. Intersections that operate at LOS E/F are already at or over capacity. Peak hour spreading would occur at intersections that would operate at LOS E/F in the future year scenario. As shown in Table 5-1 of the traffic study, 19 intersections would operate at LOS E/F. At these locations, the traffic would most likely be extended or spread out over a longer period, since the demand would exceed the available capacity during the peak-hour. Many of the traffic improvements proposed for the Urban Core are operational in nature, and will improve arterial progression during the peak commuting hours. This is likely to translate into higher vehicle speeds and possibly an improvement in LOS on certain segments. While operational improvements will not increase the 24-hour capacity of a segment, which is based on the number of lanes, they will improve traffic flow and reduce peak hour congestion. Regardless of whether the

spreading will occur in the future or not, the roadway Level of Service identified in the DEIR is shown as LOS E and F.

- G-9** The Urban Core DEIR does not change any criteria previously established in the General Plan. The definitions of significant impacts, both on roadway segments (daily volumes) and at intersections during peak hour analysis are established criteria for the City of Chula Vista as established in the recently adopted General Plan (Chapter 5, Page LUT-65). The Urban Core Circulation Element promotes the use of revised level of service standards for certain corridors and centers served by transit, alternative ways of measuring level of service for vehicles, and possibly establishing level of service criteria and performance measures for other modes of travel.
- G-10** Due to the dynamics of the land economy and the real estate market, the exact timing, location, and sequence of downtown development cannot be determined with any certainty. However, future parking supply is addressed through the provision of parking as required by the development regulations contained within Chapter 7 of the UCSP which requires that minimum parking be provided for all development types. See response to Comments E-19, G-1, and G-2.
- G-11** See responses to Comments G-1 through G-10.



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July 13, 2006

City of Chula Vista Redevelopment Agency
276 4th Avenue
Chula Vista, CA 91910

Subject: Review of the Draft Environmental Impact Report for the
City of Chula Vista's Urban Core Specific Plan, May 2006,
on behalf of Mr. Earl Jentz

To City of Chula Vista Redevelopment Agency:

On the behalf of our client, Mr. Earl Jentz, we have conducted a third-party adequacy review of the Draft Environmental Impact Report (EIR) for the City of Chula Vista's Urban Core Specific Plan (May 2006). Our review focuses on compliance with the California Environmental Quality Act (CEQA) as amended through January 1, 2005, and the State CEQA Guidelines as amended through October 6, 2005.

Our review comments on the following pages are organized under two primary categories: (1) Environmental Process Comments and (2) Comments by EIR Section. Technical review comments are included in the latter. We have also attached peer review comments by Urban Crossroads, the technical consultant retained to review the Draft EIR Traffic Study.

H-1

In general we find this Draft EIR to be a well-organized document with meaningful analysis. We have, however, identified areas of analysis that have not been completed and are important for full public disclosure of the potential environmental impacts of this project. It is our recommendation that a review of these issues be conducted by the City and, at a minimum, evaluation and appropriate mitigation to address these issues be incorporated into the Final EIR for the project. If a determination is made that any of these impacts would result in a new significant impact not disclosed in the EIR, the EIR would require revision and recirculation in accordance with CEQA Guidelines Section 15088.5.

H-2

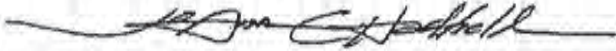
H-3 Our attached comments also provide our recommendations with respect to environmental review of subsequent projects within the UCSP area. We believe that it is important that the Secondary Study, as proposed for individual development projects be based on the standard CEQA Guidelines Appendix G checklist to assure that potential environmental impacts are not overlooked. If the Appendix G checklist is not used, the City should formally adopt City-specific significance thresholds to evaluate new development.

July 13, 2006
Page 2 of 12

We appreciate this opportunity to be of service. If you have any questions regarding our review or specific comments, please contact us.

Sincerely,

THE PLANNING CENTER

A handwritten signature in black ink, appearing to read "JoAnn C. Hadfield", written over a horizontal line.

JoAnn C. Hadfield
Director, Environmental Services

cc: Brian Sheehan
Senior Community Development Specialist

ENVIRONMENTAL PROCESS

- H-4
- **It appears that no Initial Study was prepared and there is no discussion justifying why numerous CEQA thresholds are not addressed.**

CEQA does not require preparation of an Initial Study if a lead agency has already determined that an EIR will be prepared for a project (CEQA Guidelines Section 15060, *Preliminary Review*). The CEQA Guidelines, do however, specify that "In the absence of an initial study, the lead agency shall still focus the EIR on the significant effects of the project and indicate briefly its reasons for determining that other effects would not be significant or potentially significant." Although Draft EIR Chapter 9.0 explains the rationale for eliminating agricultural resources, biological resources, and mineral resources from further review, there is no explanation why numerous CEQA Guidelines Appendix G significance thresholds have not been addressed in the respective topical sections. Potential impacts of concern are highlighted under *Comments by EIR Section* below. As an example, the Draft EIR completely neglects addressing potential vibration issues and construction noise impacts.

CEQA Guidelines Section 15063, *Initial Study*, clarifies that the individual conclusions reached by an Initial Study must be based on some evidence. Entries on a checklist or other form should be briefly explained to indicate the basis for determinations. Since no Initial Study has been prepared and because the Draft EIR does not address several issues that should have been either addressed or closed out and documented within the scoping process, the environmental process for the Urban Core Specific Plan (UCSP) EIR has not complied with CEQA. At a minimum, CEQA Initial Study checklist questions not addressed in the Draft EIR should be evaluated and documented in the Final EIR for the project. If any of the impacts are determined to be potentially significant, the EIR should be revised and recirculated.

- H-5
- **The Notice of Preparation (NOP) identified the document to be prepared as a Master EIR and the Draft EIR describes it as a Program EIR. It is important that the Draft EIR functions as a Program EIR (not an MEIR) with appropriate subsequent environmental documentation for individual projects.**

The Master EIR (MEIR) under CEQA introduced the concept of "frontloading," that is, the MEIR would be prepared for a planning program such as a General Plan or Specific Plan, and provide project-level detail in order to avoid or streamline subsequent environmental review. The UCSP EIR has not been prepared at this level of detail. Moreover, a Master EIR expires in five years, after which a subsequent or supplemental EIR or specific findings are required. The description of the Draft EIR as a Program EIR as described in Section 2.3.3 and Section 3.4.8.2 is more appropriate. Subsequent project review should be addressed in accordance with CEQA, and rely on the Program EIR only if it adequately addresses potential impacts for the individual project.

- H-6
- **The Secondary Studies for individual projects as described in Section 2.3.3, *Subsequent Environmental Review*, should be based on the standard CEQA Guidelines Checklist or equivalent checklist adopted by the City of Chula Vista.**

The description of a Secondary Study for future development within the UCSP area is vague. In accordance with CEQA, the environmental review of projects (other than those determined to be exempt from CEQA review) should be based upon the completion of an Initial Study. As with the Draft EIR, if a review of each CEQA checklist question is not performed for individual development projects, it is likely that potential environmental impacts associated with these projects will be overlooked. For example, based on a Secondary Study, decision makers may conclude that a proposed land use is within the scope of, and consistent with, the UCSP EIR, and therefore does not

require additional review. Since the Draft EIR did not address several issues such as construction noise, construction traffic and parking impacts, and vibration impacts, these impacts may subsequently be overlooked for individual projects and not appropriately mitigated. The review process should be defined to include a review of the CEQA Guidelines Appendix G checklist to assure that all potential impacts have been considered.

- H-7 • **The review process, as shown on the flowchart on Draft EIR Figure 3-30, for all subsequent UCSP projects not exempt from CEQA should specify completion and public disclosure of a CEQA Initial Study checklist.**

As indicated in the previous comment, without completion of the CEQA Initial Study checklist, potentially significant environmental impacts may be overlooked. In many cases, the City's Community Development Department may appropriately determine that the Final UCSP Program EIR sufficiently addresses project-specific impacts. This conclusion, however, should be supported and publicly disclosed.

- **If the City has not formally adopted CEQA significance thresholds unique to the City, both the UCSP Draft EIR and subsequent environmental review for projects should rely on the CEQA Guidelines, Appendix G thresholds.**

- H-8 There is no evidence that the City has adopted CEQA significance thresholds. Although the analyses of several environmental topics in the Draft EIR mirror the Appendix G thresholds, other sections use customized criteria without an explanation. As noted above, this approach has resulted in the omission of important analysis for the project (e.g., potential vibration impacts, construction-related impacts, etc.). The Final EIR should address each of the omissions as noted in the Comments by EIR Section below, and in lieu of the City adopting customized thresholds, subsequent environmental review should be based on the CEQA Guidelines, Appendix G checklist.

COMMENTS BY EIR SECTION

LAND USE

- H-9 • **Land Use compatibility conclusions are not adequately supported.**

Section 5.1.3.4 b., *Noise*, inaccurately concludes that mitigation measures in the noise section mitigate potential noise impacts, including any related land use incompatibility, to a less than significant level. As discussed below under Noise, these mitigation measures only address noise impacts to future sensitive uses within the UCSP area and do not address existing sensitive resources. Potential project-related noise impacts to existing single-family, multifamily, and mobile home residences have not been analyzed and no mitigation for these existing uses has been recommended. Similarly, the noise section does not address potential construction or operational vibration impacts. Such impacts could result in significant land use compatibility issues.

- **Traffic impacts that result in LOS below the adopted General Plan standard also constitute a significant land use impact (inconsistency with adopted plans).**

- H-10 Draft EIR Section 5.8, *Traffic, Circulation and Access*, concludes that three area intersections and one roadway segment will not achieve an acceptable Level of Service (LOS D) as defined by the General Plan Update upon buildout of the UCSP and implementation of recommended mitigation. These impacts are determined to be significant, unavoidable traffic impacts. These impacts also represent a significant Land Use impact since the minimum performance standard defined in the General Plan update for the Urban Core is LOS D. Implementation of the UCSP would not be consistent with Land Use Criterion 1 – Conformance with Relevant Plans and Policies.

- H-11 • **Potential shade and solar access impacts have not been adequately addressed and mitigation performance standards for future development have not been provided.**

The Draft EIR discloses the potential for future development of multistory buildings to result in one structure blocking an adjacent structure's sunshed or line of sight to the sun. The land use section notes that structures with heights of up to 84 feet (Third and H Street) and 210 feet (at the trolley stations) present the greatest concern. The Draft EIR does not provide an environmental analysis of this impact, but instead defers this analysis to subsequent studies that will be required in accordance with the UCSP development review process. The Draft EIR refers to UCSP, page VI-40. This section of the UCSP (Chapter VI, *Land Use & Development Regulations, D. Special Provision for Neighborhood Transition Combining Districts and Transit Focus Areas*) requires the following with respect to a future study for potential shade/shadow impacts:

- h. As part of the project design and submittal, developments within Transit Focus Areas shall conduct studies to assess the effects of light and solar access, shadowing, and wind patterns on adjacent buildings and areas.*

With respect to CEQA, this is impermissible deferral of analysis and mitigation. The requirement is not formalized as a CEQA mitigation measure (for which subsequent monitoring would assure implementation), and only specifies the requirements for a study. It does not provide performance standards. Moreover, since the requirement only applies to the Transit Focus Areas, it does not encompass all areas that would allow buildings as high as 84 feet (such as Village District V-3). The Final EIR should address this issue, and at a minimum provide mitigation measures, including performance standards, to assure that this potential impact will be analyzed and mitigated for future development.

LANDFORM ALTERATION/AESTHETICS

- H-12 • **Visual simulation for Third Avenue is not representative of potentially significant impacts to visual character along this roadway.**

Draft EIR Figure 5.2-2 shows an aesthetic and likely accurate simulation of potential future visual impacts from the viewpoint of the intersection of Davidson Street and Third Avenue. It would be helpful to have a similar visual simulation prepared for the intersection of E Street and Third Avenue within the proposed V-3 district, which would allow buildings up to 84 feet in height. Considering that this is almost twice as high as the corner building simulated in Figure 5.2-2, it would appear that an 84-foot-high building would be out of scale with the visual character of this roadway.

POPULATION AND HOUSING

- **Information regarding the potential housing units and residents that are likely to be displaced by project implementation is not provided.**

- H-13 The analysis in this section relies solely upon the fact that the UCSP would allow a substantial increase in the number of housing units. It does not analyze the location or number of existing housing units that would likely be displaced, or characterize the existing residents of those units. For example, it should be noted whether it is anticipated that mobile-home parks would be redeveloped. There is also no discussion regarding owner- vs. renter-occupied housing and the potential housing mix and availability of comparable housing within the Urban Core in the future under the UCSP. Without further analysis, it is not clear that affordable housing will be available to the residents displaced and this section of the EIR cannot conclude that impacts to existing residents would not be significant.

- **Potential impacts associated with Criteria 2 and 3 should be deemed significant and unavoidable.**

This section of the Draft EIR concludes that the displacement of substantial housing units and substantial people would be less than significant essentially because "continuous production of housing elsewhere within the Urban Core would ensure replacement of housing and provide a continuous source of housing options." The discussion under both criteria does acknowledge that a temporary housing displacement and displacement of people would occur. The fact that the General Plan Update and UCSP designate land uses to accommodate a significant future increase in housing units does not negate the significance of a substantial displacement of people and housing. Moreover, the conclusion that this impact would be temporary does not make it less than significant. Without further analysis, the Draft EIR should conclude that this is a significant project impact, particularly in light of the fact that the Housing Element for the City is still under preparation.

H-14

HYDROLOGY AND WATER QUALITY

- H-15 • **The Draft EIR fails to address several key, potential hydrological impacts.**

Among others, the following thresholds included in the CEQA Appendix G checklist have not been addressed for the project:

VIII HYDROLOGY AND WATER QUALITY

Would the project:

- g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?*
- h) Expose people or structures to significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?*
- i) Inundation by seiches, tsunamis, or mudflow.*

Because an Initial Study was not prepared for the project, potential impacts associated with these thresholds have not been addressed. It may be that the General Plan Update EIR addressed these impacts for the Urban Core. If so, the Draft EIR needs to specifically explain and reference that analysis. If not, these issues need to be addressed in the Final EIR for the UCSP.

TRAFFIC, CIRCULATION AND ACCESS

(The following comments are in addition to the peer review of the traffic study prepared by Urban Crossroads [letter attached].)

- H-16 • **The Significance Criteria fail to include a threshold for potential parking impacts or emergency access impacts.**

The following thresholds included in the CEQA Appendix G checklist have not been addressed for the project:

XV TRANSPORTATION/TRAFFIC

Would the project:

- H-17 *e) Result in inadequate emergency access?*

H- 18 *f) Result in inadequate parking capacity?*

Although the project description includes a discussion of parking requirements, the adequacy of the parking should also be addressed in the traffic section. Within the traffic section, potential

H-19 construction-related impacts should also be addressed. Traffic and parking construction-related impacts related to large-scale development as permitted under the UCSP often result in severe disruption to existing uses, such as the retail uses along Third Avenue. The Draft EIR should include the above criteria, address the potential impacts, and detail requirements in the form of mitigation

H-20 measures to assure that the impacts associated with individual projects in the future are adequately mitigated.

NOISE

- **Analysis fails to address potential vibration impacts.**

H-21 The following threshold included in the CEQA Appendix G checklist has not been addressed for the project:

XI NOISE

Would the project result in:

- b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?*

RAIL-LINE-RELATED VIBRATION

Vibration impacts on existing or proposed sensitive receptors (structures or people) should be evaluated in the noise analysis. Vibration levels generated by existing and future use of the rail line should be evaluated for the proposed residential in proximity to the rail line. Wood-framed

H-22 construction could amplify vibration levels felt by occupants by as much as 10 VdB. The acoustical analysis for individual projects should ensure that construction within the vicinity of the railroad would not result in perceptible levels of vibration for future residents. Additional building design measures, such as concrete, iron or steel, or masonry framing, may be necessary for habitable structures in close proximity to the rail line. The Program EIR should analyze the areas of potential impact within the UCSP area and specify mitigation measures and performance standards for future development projects.

CONSTRUCTION-RELATED VIBRATION

H-23 The noise analysis also needs to evaluate vibration levels generated by construction equipment, which may result in damage to fragile historic or potentially historic structures. Buildings founded in the soil in the vicinity of a construction site respond to vibrations, with varying results ranging from no perceptible effects at the lowest levels to slight damage at the highest levels. Ground vibrations very rarely approach levels that can damage structures; however, according to the Federal Transit Administration (FTA), old fragile historic structures are an exception and therefore special care must be taken to avoid damage (FTA 1995). Activities that could result in structural or cosmetic damage to old fragile historic buildings include blasting, pile driving, demolition, and drilling or excavation. As the UCSP area is host to several old historic or potentially historic structures, acoustical analysis for individual projects within the vicinity of fragile historic or potentially historic structures would need to detail construction schedules and equipment usage, which could result in levels of vibration that exceed the FTA's vibration threshold criteria for fragile historic buildings (0.20 inch per second [100 Vdb] for fragile buildings and 0.12 inch per second [95 VdB] for extremely fragile historic buildings).

H-24 The Draft EIR should specify requirements for subsequent project-specific acoustical studies and detail performance standards to limit vibration impacts. Project-specific acoustical analyses should include measures to avoid structural or cosmetic damage to fragile historic structures. As part of the acoustical analysis for vibration, the existing condition of the historic building(s) in the vicinity of the construction site should be evaluated to assess the current foundation and structural condition of the fragile historic or potentially historic structure so that actual cosmetic or structural damage to the historic building that occurs as a result of construction activities can be remediated.

- **Analysis fails to address potential construction noise impacts.**

H-25 The following threshold included in the CEQA Appendix G checklist has not been addressed for the project:

XI NOISE

Would the project result in:

- c) *A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.*

Potential construction noise impacts on existing sensitive receptors should be evaluated in the noise analysis. Section 5.9.1.1, *Existing Noise Standards*, on Page 5-194 details the City's Noise Control Ordinance (Chapter 19.68), which includes the City's construction restrictions. The noise analysis needs to include an evaluation of the project's construction noise impacts on existing sensitive uses. The acoustical analysis for individual projects should include an evaluation of the project's construction-equipment-generated noise levels in relation to the City's Noise Control Ordinance. Depending on the type of construction activity, duration, and equipment, achieving a 12-hour L_{eq} of 75 dBA at sensitive land uses may not be feasible without additional construction noise reduction measures.

H-26 ▪ **The Noise analysis does not address impacts to existing sensitive uses.**

The analysis of potential project-related noise impacts focuses on the potential noise impact to future development projects (residents, etc.) of the UCSP area. CEQA analysis typically focuses on the impact of a proposed project on existing uses. The noise analysis does not address the potential impacts on existing sensitive land uses, including residences, within the UCSP area. Similarly, it provides no mitigation for such impacts. The location of existing sensitive noise receptors needs to be identified and potential noise impacts of buildout out of the UCSP need to be evaluated. These impacts may include a substantial increase in traffic noise, which could result in an exterior noise environment that exceeds the City's compatibility standards for that land use (see Criterion 1, on page 5-197). With an increase in exterior noise levels brought about by the project, the interior noise environment of residential structures, especially those of older inferior construction, may exceed the state's 45 dBA CNEL interior noise standard and Criterion 2, "Result in interior noise levels that exceed 45 dBA CNEL due to exterior sources for habitable rooms in residences."

H-27 ▪ **The Draft EIR incorrectly states that the California Building Code exempts single-family residences from the 45 dB CNEL interior standard.**

The 45 dB CNEL standard applies to both single-family and multifamily residential structures. As noted in the previous comment, the analysis should also have included an assessment of project noise impacts to existing sensitive uses.

- H-28 • **The Draft EIR fails to evaluate single-event noise impacts on the existing and future sensitive noise receptors.**

The Draft EIR presents single-event noise data for trolleys and freight trains but does not evaluate single-event noise impacts relative to quality-of-life issues such as speech interference and sleep disturbance. The Draft EIR did convert single-event noise to the 24-hour CNEL noise metric, but this noise metric does not directly evaluate whether quality-of-life issues such as sleep disturbance would be affected. The following court cases have established that cumulative noise metrics such as the 24-hour CNEL are not sufficient to address noise impacts. Though these cases were based on airport noise, train noise is similar in terms of having high-magnitude single-event noise levels.

The Oakland Airport's sole use of a CNEL noise standard and the deficiency of not addressing noise from single-event flyovers in an EIR was found inadequate in the *Berkeley Keep Jets over the Bay Committee v. Board of Port Commissioners of the City of Oakland* (Nos. A086708, A087959, A089660), Aug. 30, 2001.

The case of *Davison v. Department of Defense* (S.D. Ohio 1982) 560 F.Supp 1019 also ruled that use of a single cumulative 24-hour noise metric is not sufficient. The court held that the 24-hour daytime nighttime level (DNL), similar to the CNEL, did not adequately inform the public about how an increase in nighttime flights would affect sleep in a nearby residential area.

In the case *Oro Fino Gold Mining Corp. v. County of El Dorado* (1990) 225 Cal.App.3d 872 [274 Cal.Rptr. 720], the court ruled that citizens' personal observations about the significance of noise impacts on their community constituted substantial evidence that the impact may be significant and should be assessed in an EIR, even though the noise levels did not exceed general planning standards (id. at pp. 881-882).

- H-29 • **The noise impact of future freeway noise was not evaluated.**

The Year 2030 traffic noise contours do not appear to reflect freeway noise impacts (Draft EIR Figure 5.9-3). Freeway noise is the largest source of noise in the project area. The Final EIR should either document that these traffic volumes have been reflected or revise the analysis to incorporate this impact.

- H-30 • **The potential impact of an increase in freight train volumes should be evaluated.**

Potential noise impacts associated with future train volumes should be evaluated. The quantity of international freight has increased substantially in the recent past. The Final EIR should incorporate an analysis of potential increases in freight train activity to ensure that noise levels from this source have been adequately documented.

AIR QUALITY

- H-31 • **It is unclear why the Draft EIR uses the South Coast Air Quality Management District (SCAQMD) significance thresholds instead of the San Diego Air Pollution Control District (SDAPCD) thresholds.**

The San Diego Air Pollution Control District (SDAPCD) has adopted their own thresholds of significance for projects for the purpose of achieving state and federal Ambient Air Quality Standards within the San Diego Air Basin (SDAB). As such, while the South Coast Air Quality Management District (SCAQMD) thresholds of significance provide a means for assessing air quality impacts, it is more appropriate to use the standards for the Basin the project is located in, when available. This standard can be found under SDAPCD Regulation 2, Rule 1501, 20.2 (d) (2): Operational Emission Thresholds. The following table lists the SDAPCD's thresholds of significance:

SDAPCD Threshold of Significance (lbs per day)	
<i>Air Pollutant</i>	<i>Operational Phase</i>
Carbon Monoxide (CO)	550 lbs/day
Nitrogen Oxides (NO _x)	250 lbs/day
Sulfur Oxides (SO _x)	250 lbs/day
Particulates (PM ₁₀)	100 lbs/day
Source: SDAPCD Regulation 2, Rule 1501, 20.2 (d) (2); Operational Emission Thresholds	

If the City has adopted the SCAQMD criteria for significance, the policy document that codifies these thresholds should be cited.

- H-32 • **Potential construction-related air emissions are typically evaluated on a daily basis instead of a quarterly or annual basis.**

The Draft EIR failed to evaluate construction emissions under the daily SCAQMD significance threshold. The SCAQMD no longer requires the use of the quarterly significance threshold but they do require the use of the daily threshold. Daily SCAQMD thresholds for four of the five air pollutants are more restrictive than the quarterly threshold when the daily threshold quantities are extrapolated for a quarter. As such, potential construction-related air quality impacts are likely understated.

The hypothetical project construction pollutant emissions shown in Table 5.10-5 and Table 5.10-6 base impacts on a yearly or quarterly basis only; however, construction pollutant emissions are generally greatest during the grading/excavation phase of the project (except for emissions of ROG, which are greatest during the architectural coating phase). Excavation for building footings may require a substantial number of heavy construction equipment and/or soil haul trips, which may generate emissions that exceed the SCAQMD construction emission thresholds. While many individual projects may not exceed these thresholds, the potential exists for a significant impact to occur not only from cumulative projects occurring at the same time within the UCSP, but from individual projects as well. While mitigation measure 5.10.5-4 may reduce pollutant emissions during construction, individual projects would need to demonstrate attainment of the SCAQMD thresholds adopted by the City, including, when adopted, the new PM_{2.5} significance threshold. While construction impacts are short term, individual projects should also include an assessment of sensitive receptors that may experience locally elevated concentrations of pollutants.

- H-33 • **The Draft EIR inaccurately concludes that the project would not result in a significant contribution to an existing or projected air quality violation.**

The Draft EIR states "There are no existing or projected air quality violations in the UCSP area. Furthermore, there are no toxic air emitters proposed as part of the UCSP. All proposed land uses are multi-family residential, commercial, retail, or public uses, and no industrial uses are proposed. Therefore, there will not be a significant contribution to an existing or projected air quality violation, and no significant impact relative to Criteria 2." This statement is inaccurate. The California Ambient Air Quality Standards have been exceeded in the UCSP area and it is in violation for 8-hour ozone, PM₁₀, and PM_{2.5}. The project will include toxic air emitters such as diesel trucks and cars. Based on the SCAQMD's MATES II air toxics study, diesel particulates are classified as a toxic air contaminant and are responsible for over 70 percent of the cancer risk in the study area. Lastly, the Draft EIR wrongly assumes that multifamily residential, commercial, retail, or public uses would not contribute to the violations in the ambient air quality standards for ozone, PM₁₀, and PM_{2.5}. These project land uses would generate additional vehicular trips, which result in exhaust emissions, the primary source of man-made air pollution in the air basin. The proposed project was already found to result in an exceedance of the SCAQMD significance thresholds, which indicates that emissions from the project

H-34 are substantial. Though project-related emissions may be less than existing conditions it does not mean that they are insignificant and would not contribute to the current nonattainment of ambient air quality standards. Because the Draft EIR stated that project-related emissions would exceed the significance threshold established by the SCAQMD, it cannot then conclude that "there will not be a significant contribution to an existing or projected air quality violation, and no significant impact relative to Criteria 2."

- **The mitigation for minimizing the impacts of diesel pollution for residences near roadways needs to be more specific.**

H-35 The Draft EIR notes that significant air quality impacts may occur due to siting residential uses near roadways that have substantial levels of diesel pollution. Mitigation 5.10.5-2 states that site design measures such as "...siting residential uses away from the freeway to the extent possible..." would help minimize the exposure to toxic diesel pollutants. The words "extent possible" is vague and undermines the efficacy of this mitigation measure. The Draft EIR already stated that there is a risk of 230 cancers out of 1 million people at a distance of 150 feet from a major roadway. This level of risk greatly exceeds the stationary source threshold of 10 in a million. As such, there needs to be a commitment to remove any sensitive uses within 1,000 feet as suggested in some of the studies incorporated by reference in CARB's *CEQA Land Use Handbook*. A revised mitigation measure for this impact should detail performance standards for future development within the UCSP area.

H-36 Mitigation Measure 5.10.5-2 states that site design measures to minimize effects of diesel pollution would include mechanical and structural measures in the project design. This is vague, and the mechanical and structural measures need to be described and performance standards defined in order for this measure to be implemented and enforced.

ALTERNATIVES

No Project Alternative

- **The conclusion that housing and population impacts for the No Project, Reduced Project, and proposed UCSP would be roughly equivalent is illogical and unsupported.**

H-37 Page 10-1 of the Alternatives section concludes that "Because the potential footprint of the impact area is roughly the same for all scenarios impacts to cultural and paleontological resources, geology and soils, population and housing and hazardous materials risks would be roughly equivalent for the proposed UCSP, the No Project, and Reduce Project alternatives." Housing and Population impacts would not directly correlate to the building footprint for the project. Given that the proposed project would result in an approximate threefold increase in housing and population, this conclusion is blatantly incorrect and should be revised in the Final EIR.

- **The rationale for concluding that Air Quality impacts associated with the No Project alternative would be greater than the proposed project is not provided.**

H-38 The analysis of the No Project alternative notes that based on modeling results, air quality impacts for the proposed UCSP would be less than those associated with the No Project. The discussion does not explain why this would occur. It is counterintuitive to believe that a threefold increase in housing and population and overall building intensity would result in a decrease in air quality impacts. This discussion should also address construction-related emissions, which would clearly be much higher for the proposed project than the No Project alternative.

Reduced Project Alternative

- H-39 • **The Draft EIR inaccurately concludes that land use impacts associated with the Reduced Project Alternative would be the same as for the proposed USCP.**

By definition, the Reduced Project Alternative would result in an approximate 25 percent reduction in development. The Draft EIR (page 10-10) concludes, however, that land use density would be the same as for the proposed UCSP. This alternative should be further described to explain why a decrease in development and number of housing units, etc., would not also result in a decrease in density. It may be logical to define this alternative to include a reduction in allowed building heights, such as in the V-3 District (from 84 feet to 45 feet) to achieve the reduction in housing units and/or commercial square footage. A comparison of a land use plan with appropriate designation to accommodate the uses, and description of height limitations, etc., would be helpful. Since the analysis of this alternative concludes that traffic, noise, air quality, and landform aesthetics impacts would all be less than the proposed project, it seems logical that land use compatibility impacts would also be reduced relative to the proposed project.

Response to Letter H The Planning Center

- H-1** It is acknowledged that the City has received and responded to comments from Urban Crossroads. See responses to Letter G.
- H-2** Based on an initial scoping process and careful evaluation, the City has determined that all appropriate potential environmental impacts of the proposed project have been addressed and fully disclosed in the DEIR. Since the release of the document for public review, no new impacts have been identified. Clarification of impacts and mitigation measures made in response to the draft EIR are documented in these responses or described in the Errata to the Final EIR.
- H-3** As stated in Sections 2.3.3 and 3.4.8.2 of the DEIR, subsequent projects' environmental review will be conducted in accordance with CEQA Guidelines Sections 15168, 15182, and 15183. The Secondary Study Checklist for individual projects within the Urban Core Specific Plan will be developed based upon these CEQA Guidelines, and the CEQA Guidelines Appendix G Checklist.
- H-4** This comment correctly states that CEQA Guidelines Section 15060 do not require the preparation of an Initial Study where the lead agency has already determined that an EIR will be prepared. As presented in Section 2.2.1 of the DEIR, the scope of analysis of this EIR was based on responses to a Notice of Preparation, comments made during the public scoping meeting, and extensive review of relevant past environmental documents (page 2-5). Issues deemed unrelated to the proposed project or project area were excluded from further review based on documented knowledge of existing conditions. For example, knowing that the project area lies outside of a mapped floodplain, the CEQA Appendix G Checklist items VIII (g) and (h) were excluded from the DEIR impact analysis. Similarly, knowing that the project is not located within an airport land use plan or within two miles of an airport, and that no wildlands are adjacent to the urbanized areas of the UCSP, airport safety and noise, and wildfire hazards, were excluded from further review in accordance with CEQA Appendix G Checklist items VII (e), (f), and (h) and XI (e) and (f).
- H-5** This DEIR is a Program EIR as described on page 1-1 of the document and in Section 2.2.3. See also response to Comment H-6.
- H-6** See response to Comment H-3.
- H-7** It is not necessary to specify the completion of a CEQA Guidelines Appendix G Checklist on the flowchart of the development permit design review process shown in Figure 3-30 of the DEIR. As presented on the flowchart, project

submittals will be subject to review for CEQA compliance through the initiation of an Environmental Secondary Study. And as described above in the response to Comment H-3, as a Program EIR, subsequent individual projects will be evaluated pursuant to CEQA Guidelines section 15168 (c) and the CEQA Guidelines Appendix G Checklist.

H-8 The majority of the environmental effects analyses were based upon CEQA Guidelines Appendix G Checklist. For some issues, for example traffic, noise, and air quality, more locally relevant thresholds were used, based in part on CEQA Guidelines Appendix G. The City of Chula Vista's Guidelines for Traffic Impact Studies, February 13, 2001, were utilized for the traffic analysis. The Chula Vista General Plan land use noise compatibility guidelines were utilized in the noise analysis. City policy to implement the South Coast Air Quality Management District's thresholds was utilized in the air quality analysis. Use of locally relevant thresholds by public agencies is allowed pursuant to CEQA Guidelines Section 15064.7. See also responses to Comments H-15 through H-25.

H-9 Topical issues such as noise are addressed in individual sections of this DEIR. The land use analysis presented in the land use Section 5.1 of the document focuses on (1) the conformance of the UCSP with other applicable plans, and (2) the compatibility of adjacent land uses. The conclusion that two uses might be compatible does not mean that noise impacts are not significant, or that mitigation of noise impacts is not required. The noise impacts discussion notes that in a mixed use environment the potential for a significant noise impact exists. Mitigation Measure 5.9-4 establishes a requirement for individual development projects to comply with the City's noise ordinance.

Despite significant and unmitigated exterior noise impacts to parks, the UCSP complies with the overarching goals of the Chula Vista General Plan Update (GPU) in regard to noise. The GPU contains compatibility guidelines which are to be generally considered at the land use planning stage for noise impact assessment and identification of mitigation measures. In keeping with this GPU standard for noise evaluation at the planning level, the noise impact assessment for the UCSP assessed impacts and developed noise mitigation measures based on the compatibility guidelines contained in the GPU.

H-10 See response to Comment H-9. Topical issues such as traffic are addressed in individual sections of this DEIR. The land use analysis presented in the land use Section 5.1 of the document focuses on (1) the conformance of the UCSP with other applicable plans, and (2) the compatibility of adjacent land uses. The conclusion that two uses might be compatible does not mean that traffic impacts are not significant, or that mitigation of traffic impacts are not required.

Section 5.8 of the DEIR identified traffic impacts and mitigation for the proposed Plan. Based on the traffic analysis, three intersections and one roadway segment would operate at below LOS D, despite mitigation. While these impacts are identified in section 5.8 of the DEIR as significant circulation impacts, they are not identified in the land use discussion as a significant land use (plan conformance) impact because the UCSP generally complies with the circulation goals of the GPU.

The GPU states that the LOS analysis provides a general indicator of segment performance. If a proposed project's circulation system meets the criteria of general segment performance, then a project can be seen to be in compliance with the GPU. Upon buildout, the UCSP's general circulation system meets the goals of good performance (LOS D or better). It is only at a few discrete locations (e.g., freeway on-ramps) that LOS drops below LOS D. As a whole, the circulation system generally performs well and thus, from the perspective of land use plan conformance, is not considered to result in a significant land use impact.

H-11 The proposed project is a Specific Plan, and as such, sufficient information is not available to determine specific solar availability conditions for existing structures in relation to future development projects. As a program-level document, it is appropriate to defer studies of specific impacts to a time at which sufficient information becomes available, such as at the individual project development permit submittal stage. It would be speculative to accurately address solar or wind access impacts or to define appropriate performance standards for a given site, at this time without the benefit of the site specific design. All new development or redevelopment within the UCSP, including construction outside of TFAs, is required to undergo design and environmental review prior to development permit approval.

H-12 This comment states that an additional visual simulation would be helpful to represent future conditions along Third Avenue, specifically, the taller 84-foot-high buildings allowed within the V-3 Subdistrict (which is outside the view frame of Figure 5.2-2). The photosimulations were prepared to demonstrate the potential change that could occur over the course of implementing the UCSP, with an emphasis on public infrastructure investment. Building scale, rather than architectural design, was also included to demonstrate the relationship of the public realm to the private realm.

It should be noted that in conformance with General Plan LUT Policy 50.12 which states "Along the immediate street frontage of the Third Avenue corridor, primarily between E and G Streets, buildings shall be predominantly low-rise, with mid-rise allowed, provided that upper stories are stepped back from the facade and are architecturally compatible with surrounding development." The UCSP includes mid-rise development along a limited segment of Third Avenue.

In addition to the mid-rise height regulation, a requirement for a 35" stepback along the building frontage is included to ensure that the pedestrian scale is maintained along Third Avenue. Further, the UCSP includes substantial design guidelines to ensure compatible design. See response to Comment I-8.

- H-13** The conclusion in the DEIR Section 5.6 that impacts to existing residents would not be significant is based upon an evaluation in accordance with CEQA Guidelines Appendix G which states that a project would create significant housing impacts if it "displaces substantial numbers of people, necessitating the construction of replacement housing elsewhere" (page 5-124). Because the proposed project is a land use and zoning document and not a specific development proposal, only general characterization of existing housing stock, residents, and housing locations can be provided. As presented in the existing conditions Section 5.6 of the DEIR, the majority of the housing stock within the UCSP Subdistricts Area is 40 to 60 years old, 27 percent is comprised of mobile home and trailer parks, and approximately 304 (of the approximately 3,700) dwelling units are restricted affordable housing (page 5-121). The issue of owner-versus renter-occupied housing and the future availability of affordable housing is a socioeconomic issue and is not reflected in the CEQA Guidelines thresholds for environmental significance. See also response to Comment E-1 and E-3.
- H-14** This comment fails to recognize that the threshold against which the impact is assessed includes the condition "...necessitating the construction of replacement housing elsewhere." Temporarily displaced residents will indeed need to seek new housing should their housing be demolished or redeveloped, but not necessarily new housing that will need to be constructed elsewhere. Displaced residents will have the opportunity to seek existing housing vacancies within the Urban Core or elsewhere. New housing built within the Urban Core will comprise housing that is additionally available to temporarily displaced Urban Core residents. See also response to Comment J-27.
- H-15** See response to Comment H-4.
- H-16** This comment states that the traffic and circulation assessment did not include parking impacts or emergency access thresholds. See responses to Comments H-17 and H-18 below.
- H-17** The roadway system established by the General Plan and reflected in the UCSP, is adequately sized to accommodate emergency vehicles. Assessment of emergency access requires project specific detail.
- H-18** Parking impacts were addressed in the DEIR in Section 5.8.3.5 and conclusions to their significance were made in Section 5.8.4. In addition, the DEIR contains Mitigation Measure 5.8.5-5 which requires that subsequent development projects

comply with the parking standards set forth in the UCSP development regulations and design guidelines (page 5-189).

- H-19** The adequacy of parking is addressed in the Traffic section of the EIR. See response to Comment H-18.
- H-20** Potential construction related impacts require project specific information. As this is a Program EIR, no specific development projects have been submitted nor are being considered. At the time an Urban Core Development Permit is applied for, the effects of construction related impacts on traffic will be considered. Depending on the size of the development, the City can require as a standard condition of approval a traffic control plan be prepared and implemented during construction to minimize impacts to traffic and parking.
- H-21** The CEQA Appendix G threshold identified in this comment was not included in the DEIR due to determination of scope made during initial project assessment. See also response to Comment H-4.
- H-22** The City recognizes that trains cause vibrations that can affect fragile structures or sensitive residents. The effect of vibration on future structures, resulting either from increased rail or new construction in proximity of rails as a result of plan implementation, is speculative because specific uses are unknown. Because of the need to have building specifics in order to analyze the effect of vibration, this analysis will be done on a case-by-case basis during the CEQA process for subsequent proposed individual projects.
- H-23** The City recognizes that vibrations from new construction can affect fragile historic or potentially historic structures. The effect of vibration on stable structures, as noted in the comment, yields imperceptible to marginal effects. Fragile structures can sustain severe damage. As the comment notes, the UCSP area is host to several old historic or potentially historic structures. The effect of future construction-related vibration on historic structures, as a result of plan implementation, is speculative because specific uses are unknown. Because of the need to have building specifics in order to analyze the effect of future construction-related vibration, this analysis will be done on a case-by-case basis during the CEQA process for subsequent proposed individual projects.
- H-24** This comment suggests that a revision of noise Mitigation Measure 5.9.2 be made to require the interior acoustical analysis to assess the current foundation and structural condition of fragile historic structures. See response to Comment H-23.
- H-25** Page 5-194 specifies that "The City of Chula Vista Noise Control Ordinance restricts times of construction activities from 7 A.M. to 7 pm Monday through

Saturday and prohibits construction on Sundays and Holidays. Compliance with this ordinance avoids potential noise impacts resulting from construction.

- H-26** The noise analysis of the GPU EIR formed the basis for the evaluation of noise impacts for the Urban Core Specific Plan. A doubling of traffic volume results in a 3 decibel increase. A three-decibel increase in noise is considered a perceptible change by the average observer (page 1-6, Table 1-2, Noise Control for Buildings and Manufacturing Plants, Bolt, Beranek and Newman, Inc, 1989). The UCSP would generate traffic on area roads that would have a corresponding increase in noise levels. These noise increases would, in certain areas, affect residential uses. Table 5.9-3 of the DEIR provides the existing noise levels resulting from traffic on area roads, and Table 5.9-4 provides the future noise levels for the same roadways. There are three roadway segments that may experience a noise increase of 3 decibels or more. These are F Street between I-5 and Woodlawn Avenue, Woodlawn Avenue between E and F Streets and Woodlawn between G and H Streets. There would be no residential uses immediately adjacent to F Street between I-5 and Woodlawn Avenue, so there is no potential effect on a sensitive use along this segment.

There are sensitive residential uses along Woodlawn Avenue; however, Woodlawn Avenue does not currently connect between F Street and G Street. For the projected volumes on Woodlawn Avenue to be manifest, this connection would have to be made. In light of this, Mitigation Measure 5.9-1 has been amended to specifically address the Woodlawn Avenue condition. Site specific noise impacts, including potential off-site impacts, would be required to be evaluated at the time a development proposal or capital improvement project to construct Woodlawn Avenue is proposed. No other roadways in the UCSP area are projected to experience an increase of 3 decibels or greater.

- H-27** As stated on page 5-203 of the DEIR, "all residential uses proposed as part of the UCSP would be multi-family and would be required to conform with this 45 dB CNEL standard" of the California Building Code.
- H-28** This comment states that the DEIR fails to evaluate single-event noise impacts on existing and future sensitive noise receptors.

Page 5-194 of the DEIR specifies that "the City's Municipal Code, Chapter 19.68 (Noise Control Ordinance) regulates noise generated by on-site activities. This ordinance specifies maximum one-hour average sound level limits at the boundary of a property. These maximum one-hour sound level are the maximum noise levels allowed at any point on or beyond the property boundaries due to activities occurring on the property." Table 5.9.1 of the DEIR shows the exterior noise limits of the Noise Control Ordinance that would apply to nuisance noise sources for two different time intervals: weekdays 7 A.M. to 7 pm and 10pm to

7am; and weekends 8am to 10pm and 10 pm to 8am. Compliance with this ordinance avoids potential noise impacts, including quality of life issues such as speech interference and sleep disturbance, resulting from nuisance noise events. Nuisance noise from freight trains and trolleys would be additionally restrained by track limitations. See also response to Comment H-30.

- H-29** The comment requests confirmation that Year 2030 noise contours reflect freeway noise impacts.

Year 2030 traffic noise contours, incorporating freeway noise, are included in Figure 5.9-3 of the DEIR. As stated on page 5-199, noise levels were modeled for a series of receivers, the parameters and results of which are provided in Appendix D. On page 9 of the Noise Technical Report in Appendix D it is stated that the analysis included traffic volume and mix data for Interstate 5.

- H-30** The comments states that potential noise impacts associated with future train volumes should be evaluated. The DEIR addresses potential noise impacts associated with future train volumes. On page 5-203 of the DEIR, Section 5.9.3 noise impact analysis, it was determined that "noise levels could exceed the standard established by the GPU for areas immediately adjacent to . . . roadways, freeways, and train and trolley lines." Development pursuant to the UCSP would result in the exposure of receivers in the UCSP area to exterior noise levels that exceed 65 CNEL in residential areas adjacent to these noise sources, if unshielded by building or other barriers. This was concluded to comprise significant exterior and interior noise impacts. Mitigation Measure 5.9-1 requires individual development projects to adequately shield exterior usable spaces from transportation related noise; and Mitigation Measure 5.9-2 requires that prior to project approval "for any residential use immediately adjacent to a circulation element roadway, trolley or rail line, or Interstate 5, an acoustical analysis shall be completed demonstrating . . . that interior noise levels due to exterior sources are 45 CNEL or less in any habitable room" (page 5-205). Freight train volume is currently limited by railroad track capacity. Trolley and freight trains presently share the same tracks, and any increase in freight activity would be limited to track capacity and the track-share arrangement.

- H-31** This comment questions the use of the South Coast Air Quality Management District (SCAQMD) significance thresholds instead of the San Diego Air Pollution Control District (SDAPCD) thresholds. The DEIR uses the South Coast Air Quality Management District (SCAQMD) significance thresholds instead of the San Diego Air Pollution Control District (SDAPCD) thresholds (as stated on page 5-216 in Criterion 3) because the SCAQMD thresholds are a CEQA standard that has been used by the City of Chula Vista in the past for five toxic air contaminants (TACs). The SDAPCD Rule 20.2 is a new source review rule that

presents generally less conservative emissions thresholds for four TACs. See also response to Comment H-32 below.

- H-32** This comment states that potential construction-related air emissions are typically evaluated on a daily basis instead of a quarterly basis. Construction emissions were evaluated in Section 5.10.3.3.a of the DEIR and projected results were stated on a quarterly basis in accordance with SCAQMD significance thresholds as stated on page 6-4 of the 1993 SCAQMD's *CEQA Air Quality Handbook*. An updated table (January 2006) showing construction and operation emissions thresholds in pounds per day is available from the SCAQMD website. As indicated in that table by superscript notation, the source for daily thresholds is the SCAQMD 1993 *CEQA Air Quality Handbook*. Applying a 90-day per quarter conversion to the tons per quarter construction emission volumes listed on page 6-4 in the 1993 *CEQA Air Quality Handbook* (and utilized in the DEIR), results in values equivalent to the pounds per day operation thresholds of the online table. The operation thresholds are more conservative than the construction emissions thresholds for two of the five listed pollutants (NO_x and VOC), and are equal to the construction emissions thresholds for the remaining three (PM₁₀, Sox, and CO). Therefore, the analysis and results presented in the DEIR are applicable in addressing the more stringent operational thresholds. Depending on how construction is extended over time, the tons per quarter volumes identified in the UCSP DEIR could be more conservative than what is allowed for construction.

Regardless, in order to meet the goal of reducing individual projects and cumulative construction-related air quality impacts to below significance, the DEIR includes Mitigation Measure 5.10.5-4. The goal suggested in the additional comment stating that individual projects need to demonstrate attainment of SCAQM thresholds would be served by Mitigation Measure 5.10.5-4 (page 5-237/8).

- H-33** This comment states the DEIR's conclusion regarding Significance Criterion 2 (violation of air quality standard) is inaccurate. The comment appears to be based on an interpretation of Criterion 2 which is different than that of the DEIR. However, the air quality concern of the comment is accurately addressed in the DEIR's analysis of Significance Criterion 3. Criterion 2, as identified on page 5-126 of the DEIR, states that a project would result in a significant impact to air quality if it would "violate any air quality standard or contribute substantially to an existing or projected air quality violation." The City interprets the "violation" in this statement as constituting the generation source of a violation of an ambient air quality standard; hence the conclusion in the DEIR that "there are no existing or projected air quality violations in the UCSP area" on page 5-218. The interpretation of criterion 2 that is suggested in this comment is instead interpreted by the City as criterion 3, and as such, the evaluation of the project's

contribution to ambient air quality standards violations is provided in the criterion 3 impact analysis in Section 5.10.3.3, Cumulative Net Increase in Criteria Pollutants. As concluded on page 5-235 of the DEIR, project impacts to criterion 3 are considered significant because the region is not in compliance with the PM_{2.5} and PM₁₀ standards.

- H-34** See response to Comment H-33 above. As concluded on page 5-235 of the DEIR, project impacts to criterion 3 are considered significant because the region is not in compliance with the PM_{2.5} and PM₁₀ standards.
- H-35** See response to Comment H-36 below. See also responses to Comments J-1, J-2 and J-4.
- H-36** This comment and Comment H-35 state that Mitigation Measure 5.10.5-2 contains language which is vague and which undermines the efficacy of the proposed mitigation.

The results of the cancer risk are provided in Table 5.10-13 of the DEIR. The calculated risk ranges from a high of 230 in 1,000,000 at some receptors 150 feet from the source to a low of 71 in 1,000,000 at 500 feet from the road. Incremental cancer risk is calculated assuming a 24 hour per day 70 year lifetime exposure. The assessment also does not account for significant mobile source emission reductions mandated to occur by state and federal regulations over the next 5-15 years.

As stated in the DEIR, in April 2005, the California Air Resources Board (CARB) published the "Air Quality and Land Use Handbook: A Community Health Perspective." The handbook makes recommendations directed at protecting sensitive land uses while balancing a myriad of other land use issues (e.g. housing, transportation needs, economics). The handbook is not regulatory or binding on local agencies and recognizes that application takes a qualitative approach. As reflected in the CARB handbook, there is currently no adopted standard for the significance of health effects from mobile sources. Although there is no adopted standard for mobile sources, such as the freeway, the effects detailed in Table 5.10-13 are considered to be cumulatively significant. The only means of reducing these effects is the implementation of source controls. The CARB has worked on developing strategies and regulations aimed at reducing the risk from diesel particulate matter. The overall strategy for achieving these reductions is found in the "Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles" (State of California 2000). A stated goal of the plan is to reduce the cancer risk statewide arising from exposure to diesel particulate matter 75 percent by 2010 and 85 percent by 2020. A number of programs and strategies to reduce diesel particulate matter that have been or are in the process of being developed include the Diesel Risk

Reduction Program which aims to reduce diesel particulate emission over the next 5 to 15 years through improved automobile design and alternative fuel efficiency (State of California 2005a, <http://www.arb.ca.gov/diesel/dieselrrp.htm>). These programs are outside of the jurisdiction of the City of Chula Vista.

However, in recognition of the guidance provided in the CARB handbook, the UCSP Development Design Guidelines (Chapter VII, Section G.5) have incorporated site design measures to be considered by future redevelopment adjacent to I-5, where possible, to help minimize effects. These measures include siting residential uses away from the freeway, tiering residential structures back from the freeway, and incorporating mechanical and structural measures into the building design. While these measures may serve to reduce the severity of diesel particulate emissions impacts, implementation of diesel vehicles source control measures by State authorities would be required to reduce cumulative impacts to below significance.

As stated in Mitigation Measure 5.10.5-2 "Prior to issuance of an Urban Core Development Permit or other discretionary permit, all subsequent individual development projects shall demonstrate to the satisfaction of the Community Development Director, conformance with the relevant land use and development regulations (UCSP, Chapter VI) and development design guidelines (UCSP, Chapter VII)." Therefore site design measures would be considered by future redevelopment adjacent to I-5, where possible, to help minimize effects. A mandatory application of the recommended design measures cannot be made without consideration of the implications on future development of the affected sites adjacent to the freeway. See also responses to Comments J-1, J-2, and J-4.

H-37 This comment is correct in observing that population and housing has been inappropriately included in the referenced sentence on page 10-1. The sentence has been revised to delete the words "population and housing." The population and housing impacts associated with the No Project, Reduced Project, and Automobile Priority Project alternatives are discussed on pages 10-9, 10-17, and 10-23, respectively, of the DEIR.

H-38 This comment states that the rationale for concluding that air quality impacts associated with the No Project Alternative would be greater than the proposed project is not provided.

Evaluation of the No Project Alternative air quality impacts was based on the General Plan Update (GPU) alternatives analysis that considered existing general plan land use designations in the UCSP area with the City as a whole. Hence, the assessment in the GPU constituted a citywide analysis and comparison. Comparing the two citywide results (former general plan versus

proposed general plan) resulted in the finding that citywide air quality conditions would be worse given the former general plan land use designations for the UCSP and elsewhere in the City. Viewed citywide, the land use designations for the UCSP and City as a whole as included in the updated General Plan (2005) would yield better air quality results than citywide conditions under the former general plan and zoning. This formed the rationale for concluding that the proposed Plan would yield potentially less air quality impacts than the No Project Alternative in the UCSP DEIR.

- H-39** This comment states that the DEIR inaccurately concludes that land use impacts associated with the Reduced Project Alternative would be the same as for the proposed UCSP. The Reduced Project Alternative assumes the continued implementation of the 2005 General Plan land use designations and thus results in similar land use effects and impacts. The Reduced Project Alternative would implement the same zoning as the proposed UCSP since this conforms with the adopted General Plan. Because the Reduced Project Alternative would result in the same land use regulations as the proposed project it would not result in the Urban Core planning area being out of compliance with the City of Chula Vista Municipal Code and would not conflict with an applicable land use plan, policy or regulation of an agency with jurisdiction over the project. The purpose of the Reduced Project Alternative is to reduce the impacts that would result from the proposed plan as they relate to intensity of use. The projected buildout would be less than projected by the General Plan, and those effects are reflected in the appropriate secondary issue areas, such as traffic, air quality, noise and public utilities and services.



July 13, 2006

VIA HAND DELIVERY

Board of Directors
 Chula Vista Redevelopment Corporation and
 Chula Vista Redevelopment Agency
 c/o City of Chula Vista
 276 Fourth Avenue
 Chula Vista, CA 91910

Re: Comments on Draft Environmental Impact Report for the City of
 Chula Vista's Urban Core Specific Plan

To the Chula Vista Redevelopment Corporation and Redevelopment Agency:

We have reviewed the Draft Environmental Impact Report for the Urban Core Specific Plan on behalf of Earl and Karen Jentz, and offer the following comments regarding the adequacy of this document.

Impact on cultural resources

- 1-1 The description of "historically significant architectural sites" and the analysis potential impacts of the proposed UCSP in the draft EIR are inadequate because they omit consideration of many buildings in the study area which the City of Chula Vista has previously identified as historically significant in its own publications.

For example, in the 1986 publication "Chula Vista Heritage 1911-1986" which was prepared by the city in commemoration of its 75th anniversary, the "People's State Bank" was identified as historically and architecturally significant. This building remains intact at the corner of Third and F Streets in the study area. (An excerpt of this publication is attached hereto as Exhibit A. The complete publication is available in the Chula Vista public library.)

Around the same time, the City's own Department of Parks and Recreation prepared a 3-volume "Historic Resources Inventory" which identifies scores of buildings in the UCSP which are not included among those identified in the draft EIR. For example, the City identified the "El Primero Hotel" located at 416 Third Avenue, as "an important example of the Zig-zag Moderne style in Chula Vista." Also identified by the City (but not identified in the draft EIR), is the Charles Smith Building at 289 Third Avenue which is also said to be of "special significance" for a number of reasons. Excerpts of the City's own analysis of the historical significance of these buildings is attached hereto as Exhibits B and C.

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- 1-2 These are just examples of the historically significant buildings identified by the City previously, but apparently ignored by the draft EIR. A more complete listing of the historically significant buildings in the study area from the Historic Resources Inventory prepared by the City (and also available at the Chula Vista public library), are attached hereto as Exhibit D.
- 1-3 We have also consulted representatives of the Chula Vista Historical Society, who provided a list of additional properties located within the UCSP area which are not reflected in the draft EIR. A listing of those properties, and the reason each should be considered historically significant is attached hereto as Exhibit E.

- 1-4 Because the draft EIR has failed to identify these historically significant properties from readily available sources, it is inadequate as an informational document and paints a misleading portrait of existing conditions. Since these cultural resources are not identified, it is impossible for the draft EIR to adequately assess the potential impacts of the UCSP on these resources, or whether the mitigation measures proposed will be effective. Consequently, this portion of the draft EIR must be substantially revised. For example, we believe that by allowing construction to 84' in height in the area of the Village District (especially at Third and F, Third and G and Third and Park), the
- 1-5 UCSP will encourage and promote the destruction and replacement of historic buildings with new development. Even if these buildings are preserved, their visibility may be obscured by out of scale adjacent developments. Nothing in the mitigation measure proposed requires set-backs, step backs or controls on bulk or scale to reduce the impacts of adjacent developments on the visibility of these historic resources.

Land use compatibility and consistency.

The draft EIR incorrectly concludes that the UCSP would not result in any land use incompatibility and policy inconsistencies.

- 1-6 First, the UCSP conflicts with, and fails to contain even an acknowledgment of, the restrictions placed on the rezoning of property under Chula Vista Municipal Code section 19.80.070—a restriction adopted by a City-wide initiative in 1988. That initiative requires the City to adopt future ordinances, resolutions and policies which are consistent with the restrictions in the initiative. (Chula Vista Municipal Code section 19.80.080.) By encouraging and allowing significant increases in residential densities, it appears that the UCSP is inconsistent with the “purposes, intents and requirements” of the initiative. The stated purpose of this initiative was to prevent “intense development” which “has overloaded the capacity of the city streets and thoroughfares to move traffic safely, efficiently, and has failed to meet traffic demands.” While the draft EIR does acknowledge that there will be adverse impacts on traffic (e.g., see draft EIR section 1.5.2), it does not acknowledge that the UCSP thereby violates the intent and purposes of Chapter 19.80 of the Chula Vista Municipal Code. This inconsistency between the UCSP and current law should be identified and reduced or eliminated.



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- 1-7 Secondly, the draft EIR neither describes, nor acknowledges that potential change in community character of the Village District which is currently characterized by numerous low-rise and historic structures along Third Avenue. Rather than extending the 45' height designation along
- 1-8 Third Avenue, the UCSP would allow the intrusion of buildings of up to 84' into this area, changing its visual character, and potentially destroying the character of this human-scale, retail-oriented street. For example, at the corner of Third and F, there are currently buildings of historic interest on three of the four corners. The draft EIR does not acknowledge that allowing construction of a building of up to 84' in height on the fourth corner—as the UCSP would permit—would dramatically change the character of the Village District. This kind of impact could be avoided by
- 1-9 extending the V2 designation to E Street and Third, and as far as G Street. This option should be addressed as a potential mitigation measure.

- Third, the General Plan current requires that, "New development and other physical alterations in Chula Vista continue to be done in a manner that respect the character, scale and historical value of the City. This approach limits discord with the physical and social climate of the City, harmonizing changes to blend in with and enhance the positive aspect of what is already here."
- 1-10 As noted above, the UCSP allows changes in adjacent land uses which are not "harmonious," in a manner inconsistent with this General Plan statement in Theme 8 of the General Plan.

Housing and population growth.

- Although the draft EIR frankly acknowledges that the City's Housing Element is incomplete and that the City has missed all deadlines for completing and adopting this required element of its General Plan, the draft EIR nonetheless concludes that the UCSP will not have a significant impact based upon the displacement of existing housing or people that will occur under the UCSP, as
- 1-11 proposed. Without a current, legally compliant Housing Element, there is no substantial evidentiary basis for reaching these conclusions. The draft EIR itself provides no substantial evidence supporting these speculative conclusions.

- The draft EIR indicates that some 7,100 additional housing units are expected under the
- 1-12 UCSP—a dramatically higher number than the 1,500-3,600 reflected in Appendix C. No effort is made to address whether these units may be affordable to the existing residents. An inventory of the
- 1-13 current housing stock and cost of housing in this area is absent from the draft EIR. Such an inventory would show that the current stock of affordable housing is likely to be replaced by new, higher density and higher cost housing, resulting the displacement of substantial numbers of current residents. The draft EIR even acknowledges that anticipated construction and development of the study area will result in the direct displacement of a substantial number of current residents and loss
- 1-14 of much of the existing housing stock. But without providing any factual basis, the draft EIR reaches the conclusion that this will be a "temporary" impact, and therefore would not be significant. The draft EIR must be supplemented to provide a factual basis for these conclusions. We note that this burden cannot be avoided by claiming (as the draft EIR also does), that the displacement of people and destruction of affordable housing is merely an indirect social or economic impact which
- 1-15 can be ignored under CEQA. The draft EIR indicates that the replacement and expansion of the



FOLEY & LARDNER LLP

CVRC and CVRDA
 July 13, 2006
 Page 4

I-16 existing housing stock and displacement of current residents will be a direct impact of the implementation of the UCSP. Under these circumstances, the draft EIR must adequately describe and analyze these impacts and propose appropriate mitigation measures.

Based upon these concerns, we believe that the draft EIR is currently inadequate, and must be supplemented to address potential impacts on cultural resources, inconsistent and incompatible land uses and policies, and housing and population displacement. We believe these omissions are sufficiently significant that recirculation of an improved draft EIR will likely be required.

We look forward to the opportunity to review the agencies' responses to these and other comments from the public.

Sincerely,

Gregory V. Moser

EXHIBIT A

PR-70



**CHULA
VISTA
HERITAGE**

1911-1986

CITY OF CHULA VISTA

PR-71



Mrs. Emma Saylor

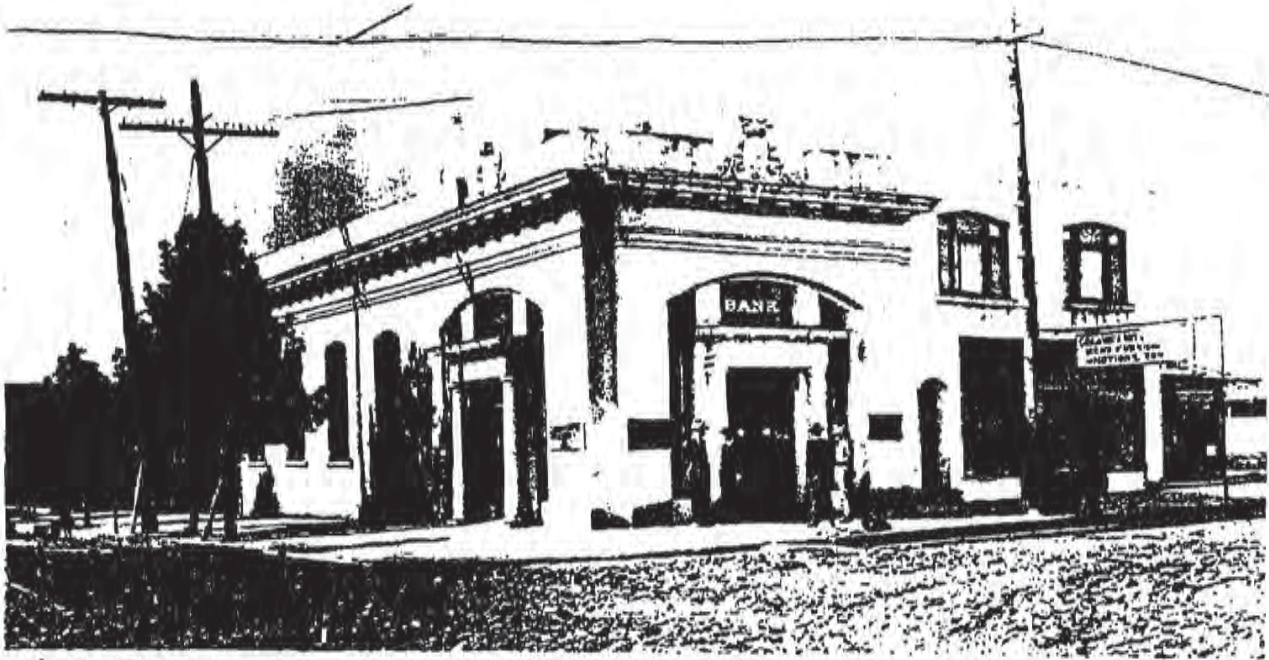


In 1908, Mrs. Emma Saylor chose Chula Vista as the place to build an old-age home. Interested in the problems of the elderly, she envisioned a community of senior citizens living together in a home-like environment. With the financial backing of wealthy Henry Timken, the inventor of a type of roller bearing, Mrs. Saylor purchased the old Dr. T. S. Sullivan orchard house on a 10-acre parcel on the east side of Third Avenue. She hired Edward and Charles Quayle, popular San Diego architects, to remodel the house and design additions. The remodeled structure served as the start of Fredericka Manor, which was named in memory of Mrs. Timken. Residents could choose between living in one of the small cottages on the grounds or residing dormitory style in the remodelled house. Recreational facilities were provided so that the elderly men and women who lived there could keep active and interested in life. Fredericka Manor, with its own farm, chicken coops and dairy, produced its own food for many years.

With the financial support of another benefactor, Henry McNabb, Mrs. Saylor was able to build a hospital

at Fredericka Manor. The McNabb Hospital, designed by the Quayle Brothers and Cressey, was dedicated on June 14, 1913. At that time, the facility was one of the most modern and best-equipped hospitals in Southern California. The building included an operating room, X-ray room, hydrotherapy, electric treatment room, maternity ward and nursery. The hospital was open to all physicians and even housed a school of nursing for the training of staff. During the first three years of operation, McNabb Hospital served the residents of Fredericka Manor and the rest of the community as well. But by 1916, rising costs forced the hospital to cease its service to the public. In 1986, Fredericka Manor, at 183 Third Avenue, continues to serve the elderly residents of Chula Vista. The original buildings have been replaced by modern structures.

In 1909, the first bank was established in Chula Vista. The People's State Bank originated in National City but was moved to Chula Vista by Bishop J. Edmonds when he bought controlling interest in the financial institution. First located at what is now 296 Third Avenue, the bank sold that building to the city trustees in 1912 for use as



People's State Bank

a city hall. The bank then moved into a new, fireproof structure at the northwest corner of Third and "F." San Diego architect Del Harris designed the new bank building. Bishop Edmonds' son, F. Warner Edmonds, who served as cashier of the People's State Bank, became one of Chula Vista's first city trustees in 1911. In 1907, he had married Martha Ward, the daughter of attorney Martin L. Ward, a Chula Vista pioneer.

In 1911, the residents of Chula Vista found their world being touched by events across the border in Mexico. A revolution threatened to overthrow the government of Porfirio Diaz. Rebel armies, composed of Mexican peasants as well as soldiers of fortune, students, teachers, idealists, political radicals, drifters and adventurers, staged

uprisings throughout Mexico. On May 9, 1911, rebels routed the Mexican government troops in Tijuana in an attempt to take over Baja California. Eager to witness the historic events, local residents drove to the border to watch the spectacle. Although American troops tried to prevent Americans from crossing into Mexico, sightseers and souvenir hunters could not resist. Then panic ensued when one rebel rode through the streets of Tijuana warning the sightseers that a government attack was imminent. Although it turned out to be a false alarm, the Americans raced to the border, tearing their clothes as they scrambled through barbed wire fences to reach the American side. On June 22, Mexican government troops recaptured Tijuana, and the rebels, many of them American, fled

Troops prepare for Battle of Tijuana in 1911



HISTORIC RESOURCES INVENTORY

UTM:	A	492680	B	3610930	Loc
	C		D		

IDENTIFICATION

1. Common name: El Primero Hotel
2. Historic name: El Primero Hotel
3. Street or rural address: 416 Third Avenue
 City Chula Vista Zip 92010 County San Diego
4. Parcel number: 568-410-29
5. Present Owner: Robert E & Barbara A Schubert Address: 457 Park Way
 City Chula Vista Zip 92010 Ownership is: Public _____ Private X
6. Present Use: hotel Original use: hotel

DESCRIPTION

- 7a. Architectural style: Zig-zag Moderne
- 7b. Briefly describe the present *physical description* of the site or structure and describe any major alterations from its original condition:
 Legal: Baird Sub, N 125' of S 225' of E 99' of Lot 2
 One of the few Zig-zag Moderne buildings in Chula Vista, the two story El Primero Hotel features large concrete vertical design elements at each front corner. The stucco building has an almost symmetrical appearance with a central entrance and a flat roof with parapets stepped up to a vertical feature at the center. Other vertical elements are placed between and on each side of the street-facing windows. A zig-zag element runs horizontally beneath the sills. The double door entrance is flanked on each side by a set of three windows. Identical sets of windows appear on the second floor just above those on the first level. A smaller window can be seen above the entrance. This window is a replacement and smaller than the original. Most of the windows in the hotel are double hung. The sides of this building are devoid of ornamentation.



8. Construction date: Estimated _____ Factual 1930
9. Architect unknown
10. Builder Dennstedt Const. Company
11. Approx. property size (In feet)
 Frontage 125 Depth 90
 or approx. acreage _____
12. Date(s) of enclosed photograph(s)
1985

13. Condition: Excellent Good _____ Fair _____ Deteriorated _____ No longer in existence _____
14. Alterations: one window on facade replaced
15. Surroundings: (Check more than one if necessary) Open land _____ Scattered buildings _____ Densely built-up
Residential _____ Industrial _____ Commercial Other: _____
16. Threats to site: None known Private development _____ Zoning _____ Vandalism _____
Public Works project _____ Other: _____
17. Is the structure: On its original site? Moved? _____ Unknown? _____
18. Related features: landscaping

SIGNIFICANCE

19. Briefly state historical and/or architectural importance (include dates, events, and persons associated with the site.)
 In 1930, the Dennstedt Construction Company erected the El Primero Hotel for John and Lilly Ratcliffe. The building, the first modern hotel in Chula Vista, cost \$30,000 and had 22 rooms. Built with white cement tile, the El Primero was fireproof and carpeted throughout. The hotel advertized such amenities as steam heat and hot and cold water. The Ratcliffes were well known in the community and had lived in Chula Vista for 26 years. They are said to have pioneered the first apartment house. The El Primero Hotel is significant as an important example of the Zig-zag Moderne style in Chula Vista. The structure appears to retain integrity of design and materials.

20. Main theme of the historic resource: (If more than one is checked, number in order of importance.)
 Architecture Arts & Leisure _____
 Economic/Industrial _____ Exploration/Settlement _____
 Government _____ Military _____
 Religion _____ Social/Education _____
21. Sources (List books, documents, surveys, personal interviews and their dates).
 CV Star Dec 5, 1930 A:4&5
 City directories
 CV Tax Assessment Rolls
22. Data form prepared 8-12-1985
 By (name) K Webster
 Organization City of Chula Vista
 Address: P.O. Box 1087
 City Chula Vista Zip 92012
 Phone: 691-5101

Locational sketch map (draw and label site and surrounding streets, roads, and prominent landmarks):

HISTORIC RESOURCES INVENTORY

TMSO _____ MAEN _____ NK _____ SHL _____ Loc _____
 UTM: A 492350 B 3611450
 C _____ D _____

FRANCIS CASUELAS
 Las Casuelas

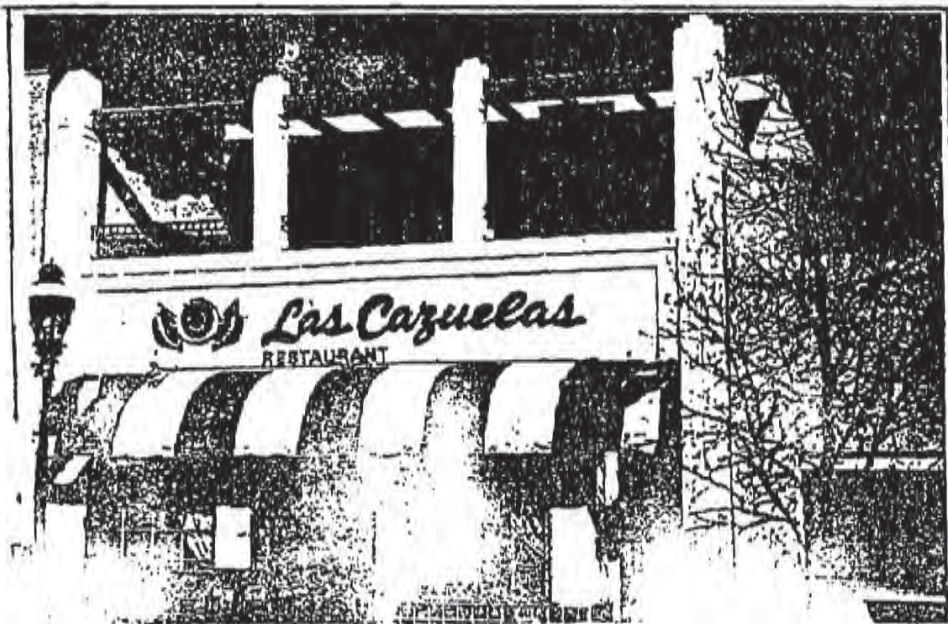
IDENTIFICATION

1. Common name: _____
2. Historic name: Charles Smith Building
3. Street or rural address: 289 Third Avenue
 City Chula Vista Zip 92010 County San Diego
4. Parcel number: 568-161-13
5. Present Owner: Dale R. Ohlan Address: 34 Vista Way
 City Chula Vista Zip 92010 Ownership is: Public _____ Private X
6. Present Use: commercial Original use: commercial & residential

DESCRIPTION

- 7a. Architectural style: Zig-zag Moderne
- 7b. Briefly describe the present physical description of the site or structure and describe any major alterations from its original condition:

Legal: Dyer Tract, Lot 4
 The upper level of this unique two story building is stepped back to provide for an open patio in front on the second floor. Four reeded concrete pillars, curved inward at the upper ends, extend up from the first floor. The upper ends are tied together by a horizontal beam. The front ends of several cross beams, which extend from the building roof, rest on the tie beam. A low wall with a wrought iron railing fills the space between the concrete pillars on the second floor. The wall features a horizontal zig-zag design just below the railing. The first floor has been altered from its original appearance. Plate glass windows have been replaced by smaller, multiple pane windows with blue ceramic tile laid from the ground level to the window sills. The entrance is recessed and has double wooden doors with a stained glass panel above. A second entry on the right leads to the second floor.



8. Construction date:
 Estimated _____ Factual 1930
9. Architect H.W. Whitsitt
10. Builder Dennstedt Const. Company
11. Approx. property size (in feet)
 Frontage 25 Depth 108
 or approx. acreage _____
12. Date(s) of enclosed photograph(s)
1985

13. Condition: Excellent Good _____ Fair _____ Deteriorated _____ No longer in existence _____
14. Alterations: facade on ground level redone
15. Surroundings: (Check more than one if necessary) Open land _____ Scattered buildings _____ Densely built-up
 Residential _____ Industrial _____ Commercial Other: _____
16. Threats to site: None known Private development _____ Zoning _____ Vandalism _____
 Public Works project _____ Other: _____
17. Is the structure: On its original site? Moved? _____ Unknown? _____
18. Related features: none

SIGNIFICANCE

19. Briefly state historical and/or architectural importance (include dates, events, and persons associated with the site.)
 In 1930, this building was constructed for Mr. and Mrs. Charles E. Smith by the Dennstedt Construction Company. Victor Tessitore of Chula Vista did the cement work. Charles E. Smith, who served as Chula Vista's first Fire Chief from 1921 to 1931, wanted a fireproof building and hired architect Hammond W. Whitsitt of San Diego to design the structure. Whitsitt came to San Diego from Illinois in 1927. He was a graduate of the University of Illinois and had studied classical architecture in Europe. In Moline, Illinois, he had designed a number of major buildings including a \$500,000 Scottish Rite Temple. The Sprouze-Reitz Company leased the Smith Building in the 1930s and 1940s. Kirby Shoes occupied the store from 1950 to 1970. This building is of special significance as one of the few Zig-zag Moderne structures in Chula Vista, as the work of noted architect H. W. Whitsitt, and because it was owned by Charles E. Smith, Chula Vista's first Fire Chief.

20. Main theme of the historic resource: (If more than one is checked, number in order of importance.)
 Architecture Arts & Leisure _____
 Economic/Industrial _____ Exploration/Settlement _____
 Government _____ Military _____
 Religion _____ Social/Education _____
21. Sources (List books, documents, surveys, personal interviews and their dates).
 CV Star Oct 17, 1930
 CV Tax Assessment Rolls
 City directories
 CVHS Bulletin
22. Date form prepared 8-12-1985
 By (name) K Webster
 Organization City of Chula Vista
 Address: P. O. Box 1087
 City Chula Vista Zip 92012
 Phone: 691-5101

Locational sketch map (draw and label site and surrounding streets, roads, and prominent landmarks):

Historic Resources Inventory

Letter Streets

HISTORIC NAME	LOCATION	COMMON NAME
ADRIAN, EUGENE	40 PALOMAR DRIVE	LEON, ARTURO
ALBRIGHT, FRANK	285 SEA VALE STREET	YUFE, JACK
ALEXANDER HOUSE, SHERMAN	638 THIRD AVENUE	SCIN HOUSE, ALBERT
ANDERSON HOUSE, CHARLES	103 FOURTH AVENUE	ANDERSON HOUSE, CHARLES
ANDERSON HOUSE, MARY	693 DEL MAR AVENUE	ANDERSON HOUSE, MARY
ANDERSON, MARY	693 DEL MAR AVENUE	ANDERSON, MARY
AUTO COURT, AQUA VISTA	70 BROADWAY	LAD'S MOTEL
AVILLA COURT	329-331 DEL MAR AVE.	AVILLA COURT
BARBER, ALBERT	151 LANDIS AVENUE	EITZEN, ABRAHAM
BARROWS HOUSE, ROSE	20 SECOND AVENUE	ROBBINS HOUSE, GERALD
BENTON, ROY	25 SECOND AVENUE	SIMPSON HOUSE, MARY
BERGEN HOUSE, NELLIE	780 FOURTH AVENUE	HOLMES HOUSE, NED
BLODETT, PHILIP	440 E STREET	WALTON, ROBERT
BOLTZ, CARL	34 DAVIDSON STREET	BOLTZ, MARY
BOLTZ, CHARLES	52 E STREET	BOLTZ, CHARLES
BOOKS HOUSE, JOSEPH	654 SECOND AVENUE	WILLIAMS HOUSE
BRIGGS, WILLIAM	236 F STREET	VAN HORN, ELECTRA
BRONSON CARRIAGE HOUSE	611 SECOND AVENUE	BRONSON CARRIAGE HOUSE
BRONSON HOUSE, BYRON	613 SECOND AVENUE	BRONSON HOUSE, BYRON
BROWNE, W. J. S.	54 F STREET	BROWNE, WILLIAM
BRYANT, HERBERT	30 F STREET	CARSON, MICHAEL
BUCK, FRED	163 MADRONA STREET	STEVENS, JAMES
BULMER HOUSE, JAMES	3 NORTH SECOND AVE	BULMER HOUSE
BUNTING, JOHN	329 D STREET	HOLIMAN, JOHN
BURSIDES HOUSE, ALEX	744 SECOND AVENUE	CONDON HOUSE, CASEY
BUSH, AGNES	742 ALPINE AVENUE	SWEAT, FORREST
BUSH, OAKLEY	144 DEL MAR AVENUE	VETICIN, MARIAN
CAMPBELL HOUSE, ERNEST	272 SECOND AVENUE	VILLARNO HOUSE, ROBERT
CAPWELL, WALLACE	255 SEA VALE STREET	CAPWELL, WALLACE
CARMICHAEL HOUSE, PHOEBE	333 SECOND AVENUE	COMBS HOUSE, BERTHA
CARREL APARTMENTS	329 G STREET	G STREET APARTMENTS
CARTER HOUSE, THOMAS	152 K STREET	PENCE HOUSE, JOHN
CARVER HOUSE, MAX	515 FOURTH AVENUE	BURNS HOUSE, HUGH
CHAPLIN, MINNIE	236 G STREET	SHADLEY, REX
CHAPMAN HOUSE, JOHN	700 SECOND AVENUE	BROWMAN HOUSE, HARREL
CHAPPELL, C. C.	164 MADRONA STREET	PELEKAI, DALLAS
CHARLES, ARTHUR	268 MADRONA STREET	MADSEN, JOHN
CHRISTY HOUSE, JAMES	221 SECOND AVENUE	KIRWAN HOUSE, JOHN
CHRISTY, LEO	124 HILLTOP DRIVE	CHRISTY, LEO
CHULA VISTA STAR BUILDING	331 F STREET	FUSON'S GARAGE
CHULA VISTA WOMEN'S CLUB	357 G STREET	CHULA VISTA WOMEN'S CLUB
CLAY HOUSE, PERCY	634 SECOND AVENUE	BONNET HOUSE, TIMOTHY
CLEVELAND, ANNIE	249 SEA VALE STREET	LeBRECQUE, JACK
CODINGTON HOUSE, JOSEPH	225 J STREET	WELLS HOUSE, NINA
CODINGTON, JOSEPH	666 DEL MAR STREET	DUCKWORTH FORD,
COFFROTH HOUSE, WILLIAM	214 FOURTH AVENUE	SWOPES, HILYATHA
COLLAR, IDA	343 D STREET	HUMPHREY ROBERT

HISTORIC NAME	LOCATION	COMMON NAME
CONKLIN, CLAUDE	877 COUNTRY CLUB DR.	McCANN, BARBARA
COOK, HAZEL GOES	62 COOK COURT	COOK, HAZEL GOES
COOMBS APARTMENTS	351 THIRD AVENUE	RABAY BUILDING
COPELAND, DWIGHT	633 DEL MAR AVENUE	CARAJAL, RAY
COUNTRY CLUB BUNGALOWS	49 AND 51 L STREET	COUNTRY CLUB BUNGALOWS
COWLISHAW, EBEN	155 CYPRESS STREET	ARNOLE, HAZEL
CROCKETT HOUSE, ALLISON	320 SECOND AVENUE	CROCKETT HOUSE, ALLISON
CROCKETT, LAURA	321 DEL MAR AVENUE	SOUTHWORTH, WILMA
CROCKETT, MARY	314 TWIN OAKS AVENUE	SCOTT, ELECTRA
DAMREN, FRANK	311 D STREET	CAMERON, MARGARET
DARROW, EDITH	273 ALVARADO STREET	WILKINSON, AGNES
DAVIDSON HOUSE, J. C.	388 K STREET	SIMAS HOUSE, JOAN
DAVIDSON HOUSE, JOHN	238 SECOND AVENUE	DAVIDSON HOUSE, JOHN
DAVIES, NADINE	614 SECOND AVENUE	BURCH HOUSE, LEE
DAVIES, JESSIE	175 MADRONA STREET	LENNEY, FRANCES
DAY HOUSE, VICTOR	279 J STREET	DAY HOUSE, AUTHUR
DAYSON COURT	516-518 FLOWER STREET	DAYSON COURT
DEAN HOUSE, PHILENA	28 SECOND AVENUE	DEAN HOUSE, PHILENA
DeGONZALES, FRED	447 I STREET	DeGONZALES, GLORIA
DEL MAR COURT	256 DEL MAR AVENUE	DEL MAR COURT
DENT, SALLIE	217 F STREET	DUGGER, MARGARET
DREW HOUSE, MARY	840 FIRST AVENUE	WITTMAYER, MARGARET
DREW, WILLIAM	475 E STREET	SHELDON, DAVID
DUNBAR HOUSE, GEORGE	674 SECOND AVENUE	MONEY HOUSE, JANE
DUPREE-GOULD	344 HILLTOP DRIVE	GOULD
EDGEComb HOUSE, MAE	834 FIRST AVENUE	SHEFFIELD HOUSE, JOHN
EDMONDS, WARNER	640 DEL MAR AVENUE	DIAS, HENRY
EDWARDS, JOSEPH	25 MADISON AVENUE	BLUM, DORJA
EITZEN, ABRAHAM	151 LANDIS AVENUE	BARBER, ALBERT
EL PRIMERO HOTEL	416 THIRD AVENUE	EL PRIMERO HOTEL
ENGBRETSON-STAFFORD HOUSE	640 FIFTH AVENUE	STAFFORD HOUSE
ESTES, JOHN	227 G STREET	FORREST, WALTER
EULITT, MARY	284 TWIN OAKS AVENUE	EULITT, MARY
EUSTIS HOUSE, PERCY	692 SECOND AVENUE	WILLIAMS HOUSE, WALTER
FARR, GRACE	163 CYPRESS STREET	GOSS, GAIL
FISCHER, FRANCES	617 DEL MAR AVENUE	ROBERTS, GLEN
FISCHER, HENRY	769 BROADWAY	HOY, GLEN
FLOWER STREET APARTMENTS	500 FLOWER STREET	FLOWER STREET APARTMENTS
FOOT, FRED	715 ELM AVENUE	MARSH, LARRY
FORTNER, ALEC	95 I STREET	BRUCE, LLOYD
FRANCISCO, MARY	681 DEL MAR AVENUE	BELMONTES
FRESHOUR HOUSE, LEONARD	54 FOURTH AVENUE	MILLIAN HOUSE, JACK
FUQUA, ELSA	189 MADRONA STREET	FUQUA, ELSA
GARRETTSON-FRANK HOUSE	642 SECOND AVENUE	FRANK HOUSE
GEORGE HOUSE, ROBERT	145 SECOND AVENUE	SIMPSON HOUSE, TIMOTHY
GILLETTE HOUSE, EDWARD	44 NORTH SECOND AVE.	DANIELSON HOUSE, MARCELLA
GILMAN, CROWDER W.	377 J STREET	WILLIAMS, FRANK

HISTORIC NAME	LOCATION	COMMON NAME
GLADDEN, ABBY	353 CHURCH AVENUE	TAKASHIMA, RONALD
GRAINGER HOUSE, BLANCH	88 K STREET	GRAINGER HOUSE, BLANCH
HAINES HOUSE, EVELYN	379 J STREET	CURTIS HOUSE, THEODORE
HAINES, ALFRED	210 DAVIDSON STREET	CORDREY, HANCEL
HALL, MARCUS	35 H STREET	TATREAU, STEVEN
HALLBURTON HOUSE, ERLE	190 K STREET	DAVIS HOUSE, JAMES
HARDESTY, EUGENE	213 CHURCH AVENUE	HARDESTY, EUGENE
HARKINS, FLORENCE	639 DEL MAR AVENUE	DIAS, HENRY
HAYNES HOUSE, WILLIAM	171 FIFTH AVENUE	OLIN HOUSE, CLARENCE
HERMAN HOTEL CARRIAGE	50 F STREET	SMITH, WILLIAM
HERSUM, TABER	56 F STREET	Mc KENSIE, AUTHUR
HOLT, ANDREW	745 CHURCH STREET	HOLT, CARL
HOLTAM, JOSEPH	670 DEL MAR AVENUE	GEVER, ROBERT
HOWARD HOUSE, HARRY	82 FOURTH AVENUE	GOINS HOUSE, ONA
HOWE COURT, THOMAS	319 - 325 G STREET	HOWE COURT, THOMAS
HURD, DAISY	559 E STREET	ANASTASI, FLORO
INSECTARY, SAN DIEGO COUNTY	511 G STREET	INSECTARY
INSKEEP, CHARLES	222 SEA VALE STREET	INSKEEP, CHARLES
JOBES, NANCY	209 D STREET	CARVER, MARCOS
JOHNSON HOUSE, LEMANDO	280 SECOND AVENUE	MERCADO HOUSE, MARY
JOHNSON, JAME	525 F STREET	JOHNSON, JAME
JOHNSON, VIOLA	453 D STREET	KRUEGEL, HOWARD
JOHNSTON, BERTHA	170 BRIGHTWOOD AVE.	PILGRIM CHURCH
JONES, S. H.	336 CHURCH AVENUE	LOUSTALET, EDWARD
JUDSON HOUSE, DAVID	263 J STREET	JARVIS HOUSE, THILDA
KELLER, FRANK	288 CENTER STREET	CHURCH STORAGE BUILDING
KINDERGARTEN BUILDING	503 G STREET	KINDERGARTEN BUILDING, OLD
KINMORE, ELMER	230 FIFTH AVENUE	LINDQUIST, NORMA
KINNARD, SALLIE	169 MADRONA STREET	MOE, OLE
KONETZKA, J. A.	478 F STREET	GRIFFIN, MARTHA
KRAFT, WILLIAM	664 DEL MAR AVENUE	VACOUS, VICTORIA
KURFURST, JOHN	275 ASH STREET	OLD COMMUNITY HOSPITAL
LAD'S MOTEL	70 BROADWAY	AUTO COURT, AQUA VISTA
LARGE, ELIZABETH	46 MADISON AVENUE	EARLY, ROSS
LEON HOUSE, ARTURO	40 PALOMAR DRIVE	ADRIAN HOUSE, EUGENE
LINDENMOOD, JAMES	210 LANDIS AVENUE	TAYLOR, IRA
LOVE, LYNN	507 G STREET	KUBIC, WALTER
LOVELL, LESLIE	231 MADRONA STREET	ALTAMIRANO, GRACE
LUZZARO, FRANK	95 D STREET	LUZZARO, FRANK
LYLE HOUSE, ALEX	419 FOURTH AVENUE	BRIGGS HOUSE, ROY
MacDONALD HOUSE, JENNIE	644 SECOND AVENUE	Mc CALL HOUSE, JEAN
MARSHALL, CAROLINE	351 CHURCH AVENUE	LANG, SYLVIA
MASTERS, HENRY	395 I STREET	ALVARADO HOUSE, ARTHUR
MAUDE, MRS. B. K., BOARDING	155 G STREET	MAUDE, MRS B. K. BOARDING HOUSE
MAYNE, WILLIAM	251 MADRONA STREET	LANTATA, DOMINICK
McCLAIN, RAY	287 CHURCH AVENUE	WILCOUS, ANSEL
McCREA, HARRY	331 GARRETT AVENUE	Mc WELLI, JOSE

HISTORIC NAME	LOCATION	COMMON NAME
McPHERSON, BENJAMIN	224 GLOVER STREET	PEOPLES, CASEY
MELVILLE BLOCK	301 - 305 THIRD AVENUE	SECURITY TRUST BANK BUILDING
MERCHANT HOUSE, MARY	278 FIFTH AVENUE	EUGEN HOUSE, RONALD
METHDIST EPISCOPAL PARISH	354 CHURCH AVENUE	KNEISS, HELEN
MIKKELSON, E.MER	410 CHURCH AVENUE	BUDEL, REX
MILLER HOUSE, BASIL	180 K STREET	HARPER HOUSE, ROBERT
MILLER, MARY	665 DEL MAR AVENUE	MILLER, MARY
MOBLEY HOUSE, OWEN	170 K STREET	VANNATTA HOUSE, JOAN
MOE, OSCAR	196 MADRONA STREET	SHIVER, CLARA
MONROE HOUSE, JOHN	730 SECOND AVENUE	DOWDLE HOUSE, DOROTHY
MORRISON, JOSEPH	22 F STREET	PRICE, GEORGE
MORRISON, SADIE	700 TWIN OAKS AVENUE	STAUFFER, JOHN
MUELLER, ROBERT	33 I STREET	FLYNN, CLIA
MURCH, LILA	706 TWIN OAKS AVENUE	SORJANO, JESUS
MYERS, OLAF	240 F STREET	PFLIMLIN, JOSEPH
NATION, JAMES	96 OAKLAWN AVENUE	NATION, JAMES
NEECE, ARTHUR	287 TWIN OAKS AVENUE	HAYDEN, KENNETH
NELSON HOUSE, CARL	88 FOURTH AVENUE	WESTWOOD HOUSE, LEROY
NELSON, HORACE	470 E STREET	TUCHSCHER, THOMAS
NEPTUNE HOUSE, FERNANDO	707 FIRST AVENUE	KELL HOUSE, JAMES
NEWCOMB, LIDA	26 F STREET	LEWIS, ROBERT
NICKOLS, CHARLES	192 MADRONA STREET	GREEN, JOHN
NORMAN, FRANCES	337 DEL MAR AVENUE	ALLEN, KATHLEEN
OLMSTEAD, HARRY	372 G STREET	ERICKSON, WILLARD
PALMER HOUSE, ARTHUR	747 FIRST AVENUE	ABBOTT HOUSE, IDELLA
PANKAU HOUSE, HERMAN	620 FOURTH AVENUE	PANKAU HOUSE, ROBERT
PARK, ROBERT	54 NORTH SECOND AVE.	PARK HOUSE, ROBERT
PAULSON, GERHARD	691 G STREET	GARCIA, ESTHE
PAYTON, HAROLD	292 SEA VALE STREET	CHANEY, NEWTON
PELL HOUSE, EDWARD	366 SECOND AVENUE	ALONZO HOUSE, JAMES
PERMAN, JOSEPH	283 TWIN OAKS AVENUE	SPENCER, NORA
PHILLIPS HOUSE, WILLIAM	355 FIRST AVENUE	JOYCE HOUSE, DELMAR
PICKERING, JOSEPH	181 MADRONA STREET	COOLEY, BARBARA
POPE, HARLOD	42 WEST PALOMAR DR.	GARCIA, FRANCISCO
PRAY, RICHARD	406 CHURCH AVENUE	BECKER, MERLE
PROCTOR, ALBERT	222 ALVARADO STREET	CLARK, CHRISTIAN
PROCTOR, MERRILL	248 DEL MAR AVENUE	PROCTOR, MERRILL
REESE, DAVID	649 CHULA VISTA STREET	HATHAWAY, DONALD
REISLAND, AARON	286 SEA VALE STREET	HENDRICKS, ROBERT
REISLAND, MARIE	231 ALVARADO STREET	WAVRIN, JOSEPH
RENICK HOUSE, CALLIE	428 FOURTH AVENUE	MATTES HOUSE, ALDA
RENICK HOUSE, ROLAND	432 FOURTH AVENUE	STEVENS HOUSE, FLORENCE
RIACH HOUSE, WILLIAM	29 L STREET	WULFF HOUSE, VICTOR
RIFE, GEORGE	630 DEL MAR AVENUE	RULLEN, ROSEMARY
ROGERS (ED) M.F. GREG	616 SECOND AVENUE	ROGERS HOUSE, GREG
RUSS HOTEL EDMOND	200 K STREET	VANEY HOUSE, THOMAS
S. D. G. & I. BUILDING	300 THIRD AVENUE	YAEI'S BRIDAL BOUTIQUE

HISTORIC NAME	LOCATION	COMMON NAME
SALLMON HOUSE, WILLIAM	435 FIRST AVENUE	SMITH HOUSE, WILLIAM
SALMON, EMANUEL	30 OAKLAWN AVENUE	TSUYAKE, YAMADA
SAMPLE, GEORGE	466 E STREET	GALLIGAN, ELIZABETH
SAN DIEGO COUNTRY CLUB	88 L STREET	SAN DIEGO COUNTRY CLUB
SCHNEIDER HOUSE, FREDERICK	672 FOURTH AVENUE	JUDD HOUSE, DONALD
SCHOONOVER, ALBERT	738 ELM AVENUE	JENSEN, CARL
SEARLE, EDWARD	220 FIG STREET	WAGNER, BERLE
SELLER, NELLIE	221 I STREET	SCHUMAKER, ROBERT
SETTE HOUSE, MARTIN	254 FIFTH AVENUE	WHEYLAND, FLORENCE
SHARP, WALTE	215 I STREET	MOREY, CURT
SHILLING, ALBERT	627 THIRD AVENUE	MALCOLM HOUSE, JAMES
SHROEDER, WILDEMAR	196 CYPRESS STREET	O'CONNELL, WILLIAM
SKINNER, MARK	374 ROOSEVELT STREET	HOLLISTER, JAY
SKINNER, MARK	219 SEAVALE STREET	SAXTON, MARY
SLAUSON HOUSE, CLARENCE	772 FOURTH AVENUE	YAMADA HOUSE, KAZUMI
SMITH BUILDING, CHARLES	289 THIRD AVENUE	LAS CASUELAS
SMITH, ANDREW	198 K STREET	ANDERSON, WILLIAM
SMITH, CLARA	264 I STREET	FOUR SEASON DAY CARE CENTER
SMITH, EDWIN, JR.	680 DEL MAR AVENUE	HOOVER, MAXINE
SMITH, EDWIN, SR.	616 DEL MAR AVENUE	BANALES, LEOPOLDO
SNOW, HENRY	210 ROOSEVELT STREET	STEEL, DONALD
SNOW, HENRY	361 ROOSEVELT STREET	RANDLE, DAVID
SOPER HOUSE, WARREN	422 SECOND AVENUE	HANSEN HOUSE, MARIE
SPRING, L. G.	170 CYPRESS STREET	WEATHERBIE, RUTH
ST. JOHN'S ESPICOPAL CHURCH	202 & 206 MADRONA ST.	TEMPLE BETH SHOLOM
St. ANGE HOUSE, MARIA	426 SECOND AVENUE	CHRISTIAN CHURCH HOUSE
STEWART, ELMER	238 DEL MAR AVENUE	McDERMOTT, DERMO
STONE HOUSE, JAMES	436 J STREET	TOOK HOUSE, PEARL
STURDEVANT, JENNIE	721 CHURCH AVENUE	DUNAWAY, MARIA
SUMNER, CHESTER	209 I STREET	LEE, KENNETH
SUMNER, HOLOWAY	654 DEL MAR AVENUE	DAMELIO, ROSE
TABER, RAY	659 DEL MAR AVENUE	TABER, MARGARET
TAYLOR HOUSE, EMANUEL	521 FOURTH AVENUE	TAYLOR HOUSE, EMANUEL
TAYLOR, FRANK	670 F STREET	RAY HALPENNY
TESSITORE HOUSE, VICTOR	114 FIFTH AVENUE	VIESCA HOUSE, RODRIGO
THEBAUD, L. A.	265 TWIN OAKS AVENUE	McKINNEY, TROY
THOMPSON, ORMSBY	153 KEARNEY STREET	DUDBRIDGE, NELLIE
THURBER, ADA	543 D STREET	NISBET, JAMES
THURSTON, THEODORE	89 COUNTRY CLUB DR.	HODGE, JAMES
TIBEREND, HARRY	50 H STREET	LACINA, WAYNE
TTEZISE HOUSE, RICHARD	682 SECOND AVENUE	OYA HOUSE, PAUL
TUCHECK, JEROME	235 MADRONA STREET	DUPUIS, JOSEPH
TUCKER HOUSE, RICHARD	646 SECOND AVENUE	FLEMING HOUSE, WILLIAM
TUTTLE, WARREN	550 FIRST AVENUE	WILLIAMS HOUSE, HARRY
ULANI, SOLA	496 F STREET	POLK, LEONA
VALLE, ELIZABETH	180 CYPRESS STREET	SHORT, NATHAN
VALLE, REGINAL	21 F STREET	STARKEY, AUCLETA

HISTORIC NAME	LOCATION	COMMON NAME
VAUGHN, ROBERT	388 DEL MAR AVENUE	MADSEN, DANTELLE
VILLEGRAN, TERESA	629 DEL MAR AVENUE	VILLEGRAN, TERESA
WAGNER, ALBERT	202 F STREET	WAGNER, ALBERT
WAGNER, FRED	211 G STREET	CESENA, ILDROLFO
WALTER, REGINAL	219 F STREET	WALTER, REGINAL
WESSELS, LOUISE	39 G STREET	SILVEYRA, AUGUST
WHITTINGHAM, JOSEPH	741 ELM AVENUE	SHEA, ADELLA
WILLIAMS, DANIEL	186 CYPRESS STREET	AMBRIZ,
WOMEN'S CLUB HOUSE	382-384 DEL MAR AVE.	OLD CLUBHOUSE BUILDING
WORTHINGTON, GEORGE	669 DEL MAR AVENUE	EL NIDO
WORTHINGTON, PAUL	237 GARRETT AVENUE	WARDEN, WILLIAM
WRIGHT HOUSE, LUCIOUS	10 SECOND AVENUE	WRIGHT HOUSE, LUCIOUS
YUFE HOUSE, JACK	218 SEA VALE STREET	ALBRIGHT HOUSE, FRANK

COMMON NAME	LOCATION	HISTORIC NAME
ABBOTT HOUSE, IDELLA	747 FIRST AVENUE	PALMER HOUSE, ARTHUR
ADRIAN HOUSE, EUGENE	40 PALOMAR DRIVE	LEON HOUSE, ARTURO
ALBRIGHT HOUSE, FRANK	218 SEA VALE STREET	YUFE HOUSE, JACK
ALLEN, KATHLEEN	337 DEL MAR AVENUE	NORMAN, FRANCES
ALONZO HOUSE, JAMES	366 SECOND AVENUE	PELL HOUSE, EDWARD
ALTAMIRANO, GRACE	231 MADRONA STREET	LOVELL, LESLIE
ALVARADO HOUSE, ARTHUR	395 I STREET	MASTERS, HENRY
AMBRIZ,	186 CYPRESS STREET	WILLIAMS, DANIEL
ANASTASI, FLORO	559 E STREET	HURD, DAISY
ANDERSON HOUSE, CHARLES	103 FOURTH AVENUE	ANDERSON HOUSE, CHARLES
ANDERSON HOUSE, MARY	693 DEL MAR AVENUE	ANDERSON HOUSE, MARY
ANDERSON, MARY	693 DEL MAR AVENUE	ANDERSON, MARY
ANDERSON, WILLIAM	198 K STREET	SMITH, ANDREW
ARNOLE, HAZEL	155 CYPRESS STREET	COWLISHAW, EBEN
AUTO COURT, AQUA VISTA	70 BROADWAY	LAD'S MOTEL
AVILLA COURT	329-331 DEL MAR AVE.	AVILLA COURT
BANALES, LEOPOLDO	616 DEL MAR AVENUE	SMITH, EDWIN, SR.
BARBER, ALBERT	151 LANDIS AVENUE	ETTZEN, ABRAHAM
BECKER, MERLE	406 CHURCH AVENUE	PRAY, RICHARD
BELMONTES	681 DEL MAR AVENUE	FRANCISCO, MARY
BLUM, DORIA	25 MADISON AVENUE	EDWARDS, JOSEPH
BOLTZ, CHARLES	52 E STREET	BOLTZ, CHARLES
BOLTZ, MARY	34 DAVIDSON STREET	BOLTZ, CARL
BONNET HOUSE, TIMOTHY	634 SECOND AVENUE	CLAY HOUSE, PERCY
BRIGGS HOUSE, ROY	419 FOURTH AVENUE	LYLE HOUSE, ALEX
BRONSON CARRIAGE HOUSE	611 SECOND AVENUE	BRONSON CARRIAGE HOUSE
BRONSON HOUSE, BYRON	613 SECOND AVENUE	BRONSON HOUSE, BYRON
BROWMAN HOUSE, HARREL	700 SECOND AVENUE	CHAPMAN HOUSE, JOHN
BROWNE, WILLIAM	54 F STREET	BROWNE, W. J. S.
BRUCE, LLOYD	95 I STREET	FORTNER, ALEC
BUDEL, REX	410 CHURCH AVENUE	MIKKELSON, E.MER
BULLEN, ROSEMARY	630 DEL MAR AVENUE	RIFE, GEORGE
BULMER HOUSE	3 NORTH SECOND AVE	BULMER HOUSE, JAMES
BURCH HOUSE, LEE	614 SECOND AVENUE	DAVIES, NADINE
BURNS HOUSE, HUGH	515 FOURTH AVENUE	CARVER HOUSE, MAX
CAMERON, MARGARET	311 D STREET	DAMREN, FRANK
CAPWELL, WALLACE	255 SEA VALE STREET	CAPWELL, WALLACE
CARAJAL, RAY	633 DEL MAR AVENUE	COPELAND, DWIGHT
CARSON, MICHAEL	30 F STREET	BRYANT, HERBERT
CARVER, MARCOS	209 D STREET	JOBES, NANCY
CESENA, ILDROLFO	211 G STREET	WAGNER, FRED
CHANEY, NEWTON	292 SEA VALE STREET	PAYTON, HAROLD
CHRISTIAN CHURCH HOUSE	426 SECOND AVENUE	St ANGE HOUSE, MARIA
CHRISTY, LEO	124 HILLTOP DRIVE	CHRISTY, LEO
CHULA VISTA WOMEN'S CLUB	357 G STREET	CHULA VISTA WOMEN'S CLUB
CHURCH STORAGE BUILDING	288 CENTER STREET	KELLER, FRANK
CLARK, CHRISTIAN	222 ALVARADO STREET	PHILIP, ALBERT

COMMON NAME	LOCATION	HISTORIC NAME
COMBS HOUSE, BERTHA	333 SECOND AVENUE	CARMICHAEL HOUSE, PHOEBE
CONDON HOUSE, CASEY	744 SECOND AVENUE	BURSIDES HOUSE, ALEX
COOK, HAZEL GOES	62 COOK COURT	COOK, HAZEL GOES
COOLEY, BARBARA	181 MADRONA STREET	PICKERING, JOSEPH
CORDREY, HANSEL	210 DAVIDSON STREET	HAINES, ALFRED
COUNTRY CLUB BUNGALOWS	49 AND 51 L STREET	COUNTRY CLUB BUNGALOWS
CROCKETT HOUSE, ALLISON	320 SECOND AVENUE	CROCKETT HOUSE, ALLISON
CURTIS HOUSE, THEODORE	379 J STREET	HAINES HOUSE, EVELYN
DAMELIO, ROSE	654 DEL MAR AVENUE	SUMNER, HOLOWAY
DARLING HOUSE, MARCELLA	44 NORTH SECOND AVE.	GILLETTE HOUSE, EDWARD
DAVIDSON HOUSE, JOHN	238 SECOND AVENUE	DAVIDSON HOUSE, JOHN
DAVIS HOUSE, JAMES	190 K STREET	HALLIBURTON HOUSE, ERLE
DAY HOUSE, AUTHUR	279 J STREET	DAY HOUSE, VICTOR
DAYSON COURT	516-518 FLOWER STREET	DAYSON COURT
DEAN HOUSE, PHILENA	28 SECOND AVENUE	DEAN HOUSE, PHILENA
DeGONZALES, GLORIA	447 I STREET	DeGONZALES, FRED
DEL MAR COURT	256 DEL MAR AVENUE	DEL MAR COURT
DEVANEY HOUSE, THOMAS	200 K STREET	RUSS HOUSE, EDMOND
DIAS, HENRY	639 DEL MAR AVENUE	HARKINS, FLORENCE
DIAS, HENRY	640 DEL MAR AVENUE	EDMONDS, WARNER
DOWDLE HOUSE, DOROTHY	730 SECOND AVENUE	MONROE HOUSE, JOHN
DUCKWORTH-FORD,	666 DEL MAR STREET	CODINGTON, JOSEPH
DUDBRIDGE, NELLIE	153 KEARNEY STREET	THOMPSON, ORMSBY
DUGGER, MARGARET	217 F STREET	DENT, SALLIE
DUNAWAY, MARIA	721 CHURCH AVENUE	STURDEVANT, JENNIE
DUPUIS, JOSEPH	235 MADRONA STREET	TUCHECK, JEROME
EARLY, ROSS	46 MADISON AVENUE	LARGE, ELIZABETH
EITZEN, ABRAHAM	151 LANDIS AVENUE	BARBER, ALBERT
EL NIDO	669 DEL MAR AVENUE	WORTHINGTON, GEORGE
EL PRIMERO HOTEL	416 THIRD AVENUE	EL PRIMERO HOTEL
ERICKSON, WILLARD	372 G STREET	OLMSTEAD, HARRY
EUGEN HOUSE, RONALD	278 FIFTH AVENUE	MERCHANT HOUSE, MARY
EULITT, MARY	284 TWIN OAKS AVENUE	EULITT, MARY
FLEMING HOUSE, WILLIAM	646 SECOND AVENUE	TUCKER HOUSE, RICHARD
FLOWER STREET APARTMENTS	500 FLOWER STREET	FLOWER STREET APARTMENTS
FLYNN, CILIA	33 I STREET	MUELLER, ROBERT
FORREST, WALTER	227 G STREET	ESTES, JOHN
FOUR SEASON DAY CARE CENTER	264 I STREET	SMITH, CLARA
FRANK HOUSE	642 SECOND AVENUE	GARRETTSON-FRANK HOUSE
FUQUA, ELSEN	189 MADRONA STREET	FUQUA, ELSEN
FUSON'S GARAGE	331 F STREET	CHULA VISTA STAR BUILDING
G STREET APARTMENTS	329 G STREET	CARREL APARTMENTS
GALLIGAN, ELIZABETH	466 E STREET	SAMPLE, GEORGE
GARCIA, ESTHE	691 G STREET	PAULSON, GERHARD
GARCIA, FRANCISCO	42 WEST PALOMAR DR.	POPE, HARLOD
GAVER, ROBERT	670 DEL MAR AVENUE	HOLTAM, JOSEPH
GUINS HOUSE, ONA	82 FOURTH AVENUE	HOLTAM HOUSE, HARRY

COMMON NAME	LOCATION	HISTORIC NAME
GOSS, GAIL	163 CYPRESS STREET	FARR, GRACE
GOULD	344 HILLTOP DRIVE	DUPREE-GOULD
GRAINGER HOUSE, BLANCH	88 K STREET	GRAINGER HOUSE, BLANCH
GREEN, JOHN	192 MADRONA STREET	NICKOLS, CHARLES
GRIFFIN, MARTHA	478 F STREET	KONETZKA, J. A.
HANSEN HOUSE, MARIE	422 SECOND AVENUE	SOPER HOUSE, WARREN
HARDESTY, EUGENE	213 CHURCH AVENUE	HARDESTY, EUGENE
HARPER HOUSE, ROBERT	180 K STREET	MILLER HOUSE, BASIL
HATHAWAY, DONALD	649 CHULA VISTA STREET	REESE, DAVID
HAYDEN, KENNETH	287 TWIN OAKS AVENUE	NEECE, ARTHUR
HENDRICKS, ROBERT	286 SEA VALE STREET	REISLAND, AARON
HODGE, JAMES	89 COUNTRY CLUB DR.	THURSTON, THEODORE
HOLIMAN, JOHN	329 D STREET	BUNTING, JOHN
HOLLISTER, JAY	374 ROOSEVELT STREET	SKINNER, MARK
HOLMES HOUSE, NED	780 FOURTH AVENUE	BERGEN HOUSE, NELLIE
HOLT, CARL	745 CHURCH STREET	HOLT, ANDREW
HOOVER, MAXINE	680 DEL MAR AVENUE	SMITH, EDWIN, JR.
HOWE COURT, THOMAS	319 - 325 G STREET	HOWE COURT, THOMAS
HOY, GLEN	769 BROADWAY	FISCHER, HENRY
HUMPHREY, ROBERT	343 D STREET	COLLAR, IDA
INSECTARY	511 G STREET	INSECTARY, SAN DIEGO COUNTY
INSKEEP, CHARLES	222 SEA VALE STREET	INSKEEP, CHARLES
JARVIS HOUSE, THILDA	263 J STREET	JUDSON HOUSE, DAVID
JENSEN, CARL	738 ELM AVENUE	SCHOONOVER, ALBERT
JOHNSON, JAME	525 F STREET	JOHNSON, JAME
JOYCE HOUSE, DELMAR	355 FIRST AVENUE	PHILLIPS HOUSE, WILLIAM
JUDD HOUSE, DONALD	672 FOURTH AVENUE	SCHNEIDER HOUSE, FREDERICK
KELL HOUSE, JAMES	707 FIRST AVENUE	NEPTUNE HOUSE, FERNANDO
KINDERGARTEN BUILDING, OLD	503 G STREET	KINDERGARTEN BUILDING
KIRWAN HOUSE, JOHN	221 SECOND AVENUE	CHRISTY HOUSE, JAMES
KNEISS, HELEN	354 CHURCH AVENUE	METHDIST EPISCOPAL PARISH
KRUEGEL, HOWARD	453 D STREET	JOHNSON, VIOLA
KUBIC, WALTER	507 G STREET	LOVE, LYNN
LACINA, WAYNE	50 H STREET	TIBEREND, HARRY
LAD'S MOTEL	70 BROADWAY	AUTO COURT, AQUA VISTA
LALICATA, DOMINICK	251 MADRONA STREET	MAYNE, WILLIAM
LANG, SYLVIA	351 CHURCH AVENUE	MARSHALL, CAROLINE
LAS CASUELAS	289 THIRD AVENUE	SMITH BUILDING, CHARLES
LeBRECQUE, JACK	249 SEA VALE STREET	CLEVELAND, ANNE
LEE, KENNETH	209 I STREET	SUMNER, CHESTER
LENNEY, FRANCES	175 MADRONA STREET	DAVIES, JESSIE
LEON, ARTURO	40 PALOMAR DRIVE	ADRIAN, EUGENE
LEWIS, ROBERT	26 F STREET	NEWCOMB, LIDA
LINDQUIST, NORMA	230 FIFTH AVENUE	KINMORE, ELMER
LOUSTALET, EDWARD	336 CHURCH AVENUE	JONES, S. H.
LUZZARO, FRANK	95 D STREET	LUZZARO, FRANK
MADSEN, DAVID	388 DEL MAR AVENUE	WYCHN, ROBERT

COMMON NAME	LOCATION	HISTORIC NAME
MADSEN, JOHN	268 MADRONA STREET	CHARLES, ARTHUR
MALCOLM HOUSE, JAMES	627 THIRD AVENUE	SHILLING, ALBERT
MARSH, LARRY	715 ELM AVENUE	FOOT, FRED
MATTES HOUSE, ALDA	428 FOURTH AVENUE	RENICK HOUSE, CALLIE
MAUDE, MRS B. K. BOARDING	155 G STREET	MAUDE, MRS. B. K., BOARDING
Mc CALL HOUSE, JEAN	644 SECOND AVENUE	MacDONALD HOUSE, JENNIE
Mc KENSIE, AUTHUR	56 F STREET	HERSUM, TABER
McCANN, BARBARA	877 COUNTRY CLUB DR.	CONKLIN, CLAUDE
McDERMOTT, DERMO	238 DEL MAR AVENUE	STEWART, ELMER
McKINNEY, TROY	265 TWIN OAKS AVENUE	THIEBAUD, L. A.
MERCADO HOUSE, MARY	280 SECOND AVENUE	JOHNSON HOUSE, LEMANDO
MILLER, MARY	665 DEL MAR AVENUE	MILLER, MARY
MILLIAN HOUSE, JACK	54 FOURTH AVENUE	FRESHOUR HOUSE, LEONARD
MOE, OLE	169 MADRONA STREET	KINNARD, SALLIE
MONEY HOUSE, JANE	674 SECOND AVENUE	DUNBAR HOUSE, GEORGE
MOREY, CURT	215 I STREET	SHARP, WALTE
NATION, JAMES	96 OAKLAWN AVENUE	NATION, JAMES
NISBET, JAMES	543 D STREET	THURBER, ADA
NOVELLI, JOSE	225 GARRETT AVENUE	McCREA, HARRY
O'CONNELL, WILLIAM	196 CYPRESS STREET	SHROEDER, WILDEMAR
OLD CLUBHOUSE BUILDING	382-384 DEL MAR AVE.	WOMEN'S CLUB HOUSE
OLD COMMUNITY HOSPITAL	275 ASH STREET	KURFURST, JOHN
OLIN HOUSE, CLARENCE	171 FIFTH AVENUE	HAYNES HOUSE, WILLIAM
OYA HOUSE, PAUL	682 SECOND AVENUE	TTEZISE HOUSE, RICHARD
PANKAU HOUSE, ROBERT	620 FOURTH AVENUE	PANKAU HOUSE, HERMAN
PARK HOUSE, ROBERT	54 NORTH SECOND AVE.	PARK, ROBERT
PELEKAI, DALLAS	164 MADRONA STREET	CHAPPELL, C. C.
PENCE HOUSE, JOHN	152 K STREET	CARTER HOUSE, THOMAS
PEOPLES, CASEY	224 GLOVER STREET	McPHERSON, BENJAMIN
PFLIMLIN, JOSEPH	240 F STREET	MYERS, OLAF
PILGRIM CHURCH	170 BRIGHTWOOD AVE.	JOHNSTON, BERTHA
POLK, LEONA	496 F STREET	ULAND, VIOLA
PRICE, GEORGE	22 F STREET	MORRISON, JOSEPH
PROCTOR, MERRILL	248 DEL MAR AVENUE	PROCTOR, MERRILL
RABAY BUILDING	351 THIRD AVENUE	COOMBS APARTMENTS
RANDLE, DAVID	361 ROOSEVELT STREET	SNOW, HENRY
RAY HALPENNY	670 F STREET	TAYLOR, FRANK
ROBBINS HOUSE, GERALD	20 SECOND AVENUE	BARROWS HOUSE, ROSE
ROBERTS, GLEN	617 DEL MAR AVENUE	FISCHER, FRANCES
ROGERS HOUSE, GREG	616 SECOND AVENUE	ROGERS HOUSE, GREG
SAN DIEGO COUNTRY CLUB	88 L STREET	SAN DIEGO COUNTRY CLUB
SAXTON, MARY	219 SEAVALE STREET	SKINNER, MARK
SCHUMAKER, ROBERT	221 I STREET	SELLER, NELLIE
SCIN HOUSE, ALBERT	638 THIRD AVENUE	ALEXANDER HOUSE, SHERMAN
SCOTT, ELECTRA	314 TWIN OAKS AVENUE	CROCKETT, MARY
SECURITY TRUST BANK BUILDING	301 - 303 THIRD AVENUE	MELVILLE BLOCK
SHADLEY, J.	236 G STREET	HAPLIN, MINNIE

COMMON NAME	LOCATION	HISTORIC NAME
SHEA, ADELLA	741 ELM AVENUE	WHITTINGHAM, JOSEPH
SHEFFIELD HOUSE, JOHN	834 FIRST AVENUE	EDGECOMB HOUSE, MAE
SHELDON, DAVID	475 E STREET	DREW, WILLIAM
SHIVER, CLARA	196 MADRONA STREET	MOE, OSCAR
SHORT, NATHAN	180 CYPRESS STREET	VAUGHN, ELIZABETH
SIEWERT HOUSE, TIMOTHY	145 SECOND AVENUE	GEORGE HOUSE, ROBERT
SILVEYRA, AUGUST	39 G STREET	WESSELS, LOUISE
SIMAS HOUSE, JOAN	388 K STREET	DAVIDSON HOUSE, J. C.
SIMPSON HOUSE, MARY	25 SECOND AVENUE	BENTON, ROY
SMITH HOUSE, WILLIAM	435 FIRST AVENUE	SALLMON HOUSE, WILLIAM
SMITH, WILLIAM	50 F STREET	HERMAN HOTEL CARRIAGE
SORIANO, JESUS	706 TWIN OAKS AVENUE	MURCH, LILA
SOUTHWORTH, WILMA	321 DEL MAR AVENUE	CROCKETT, LAURA
SPENCER, NORA	283 TWIN OAKS AVENUE	PERMAN, JOSEPH
STAFFORD HOUSE	640 FIFTH AVENUE	ENGBRETSON-STAFFORD
STARKEY, AUGUSTA	21 F STREET	VAUGHN, REGINAL
STAUFFER, JOHN	700 TWIN OAKS AVENUE	MORRISON, SADIE
STEEL, DONALD	210 ROOSEVELT STREET	SNOW, HENRY
STEVENS HOUSE, FLORENCE	432 FOURTH AVENUE	RENICK HOUSE, ROLAND
STEVENS, JAMES	163 MADRONA STREET	BUCK, FRED
SWEAT, FORREST	742 ALPINE AVENUE	BUSH, AGNES
SWOPES, HAWATHA	214 FOURTH AVENUE	COFFROTH HOUSE, WILLIAM
TABER, MARGARET	659 DEL MAR AVENUE	TABER, RAY
TAKASHIMA, RONALD	353 CHURCH AVENUE	GLADDEN, ABBY
TATREAU, STEVEN	35 H STREET	HALL, MARCUS
TAYLOR HOUSE, EMANUEL	521 FOURTH AVENUE	TAYLOR HOUSE, EMANUEL
TAYLOR, IRA	210 LANDIS AVENUE	LINDENMOOD, JAMES
TEMPLE BETH SHOLOM	202 & 206 MADRONA ST.	ST. JOHN'S ESPICOPAL CHURCH
TOOK HOUSE, PEARL	436 J STREET	STONE HOUSE, JAMES
TSUYAKE, YAMADA	30 OAKLAWN AVENUE	SALMON, EMANUEL
TUCHSCHER, THOMAS	470 E STREET	NELSON, HORACE
VACOUB, VICTORIA	664 DEL MAR AVENUE	KRAFT, WILLIAM
VAN HORN, ELECTRA	236 F STREET	BRIGGS, WILLIAM
VANNATTA HOUSE, JOAN	170 K STREET	MOBLEY HOUSE, OWEN
VETICH, MARIAN	144 DEL MAR AVENUE	BUSH, OAKLEY
VIESCA HOUSE, RODRIGO	114 FIFTH AVENUE	TESSITORE HOUSE, VICTOR
VILLARINO HOUSE, ROBERT	272 SECOND AVENUE	CAMPBELL HOUSE, ERNEST
VILLEGRAN, TERESA	629 DEL MAR AVENUE	VILLEGRAN, TERESA
WAGNER, ALBERT	202 F STREET	WAGNER, ALBERT
WAGNER, BERLE	220 FIG STREET	SEARLE, EDWARD
WALTER, REGINAL	219 F STREET	WALTER, REGINAL
WALTON, ROBERT	440 E STREET	BLODETT, PHILIP
WARDEN, WILLIAM	237 GARRETT AVENUE	WORTHINGTON, PAUL
WATROUS, ANSEL	287 CHURCH AVENUE	McCLAIN, RAVENDA
WAYRN, JOSEPH	231 IVARADO STREET	REISLAND, MARIE
WEATHERBIE, RUTH	17 CYPRESS STREET	SPRING, L. G.
WELLS, NINA	20 J STREET	CODINGTON HOUSE

COMMON NAME	LOCATION	HISTORIC NAME
WESTWOOD HOUSE, LEROY	88 FOURTH AVENUE	NELSON HOUSE, CARL
WHEYLAND, FLORENCE	254 FIFTH AVENUE	SETTE HOUSE, MARTIN
WILKINSON, AGNES	273 ALVARADO STREET	DARROW, EDITH
WILLIAMS HOUSE	654 SECOND AVENUE	BOOKS HOUSE, JOSEPH
WILLIAMS HOUSE, HARRY	550 FIRST AVENUE	TUTTLE, WARREN
WILLIAMS HOUSE, WALTER	692 SECOND AVENUE	EUSTIS HOUSE, PERCY
WILLIAMS, FRANK	222 H STREET	GILMAN, CROZIER W.
WITTMAYER, MARGARET	840 FIRST AVENUE	DREW HOUSE, MARY
WRIGHT HOUSE, LUCIOUS	10 SECOND AVENUE	WRIGHT HOUSE, LUCIOUS
WULFF HOUSE, VICTOR	29 L STREET	RIACH HOUSE, WILLIAM
YAEI'S BRIDAL BOUTIQUE	337 THIRD AVENUE	S. D. G. & E. BUILDING
YAMADA HOUSE, KAZUMI	772 FOURTH AVENUE	SLAUSON HOUSE, CLARENCE
YUFE, JACK	285 SEA VALE STREET	ALBRIGHT, FRANK

Historic Resources Inventory

Number Streets

		House	House			
40	10 Second Avenue	Lucious Wright House	Lucious Wright House	8/18/86	7/28/87	N
41	614 Second Avenue	Nadine Davies House	Lee Burch House	7/28/86	7/28/87	Y
42	616 Second Avenue	Greg Rogers House	Greg Rogers House	7/28/86	7/28/87	Y
43	642 Second Avenue	Garrettson-Frank House	Frank House	7/28/86	7/28/87	N (Y) ??
44	644 Second Avenue	Jennie MacDonald House	Jean Mcall House	7/28/86	7/28/87	**
45	311 D Street (?????)	Frank Damren House	Margaret Cameron House			
46		Rohr Manor		8/25/86	7/28/87	Y

* Owners submitted letters to City Council at the 7/28/87 meeting requesting no designation.

** The Historical Site Permit was originally imposed by City Council on 7/28/87, but was later removed by City Council on 12/20/94 by request of property owner.

CROSS REFERENCE BY LOCATION

LOCATION	HISTORIC NAME	COMMON NAME
95 D STREET	LUZZARO, FRANK	LUZZARO, FRANK
209 D STREET	JOBES, NANCY	CARVER, MARCOS
311 D STREET	DAMREN, FRANK	CAMERON, MARGARET
329 D STREET	BUNTING, JOHN	HOLIMAN, JOHN
343 D STREET	COLLAR, IDA	HUMPHREY, ROBERT
453 D STREET	JOHNSON, VIOLA	KRUEGEL, HOWARD
543 D STREET	THURBER, ADA	NISBET, JAMES
52 E STREET	BOLTZ, CHARLES	BOLTZ, CHARLES
440 E STREET	BLODETT, PHILIP	WALTON, ROBERT
468 E STREET	SAMPLE, GEORGE	GALLIGAN, ELIZABETH
470 E STREET	NELSON, HORACE	TUCHSCHER, THOMAS
475 E STREET	DREW, WILLIAM	SHELDON, DAVID
559 E STREET	HURD, DAISY	ANASTASI, FLORO
21 F STREET	VAUGHN, REGINAL	STARKEY, AUGUSTA
22 F STREET	MORRISON, JOSEPH	PRICE, GEORGE
26 F STREET	NEWCOMB, LIDA	LEWIS, ROBERT
30 F STREET	BRYANT, HERBERT	CARSON, MICHAEL
50 F STREET	HERMAN HOTEL CARRIAGE HOUSE	SMITH, WILLIAM
54 F STREET	BROWNE, W. J. S.	BROWNE, WILLIAM
56 F STREET	HERSUM, TABER	Mc KENSIE, AUTHUR
202 F STREET	WAGNER, ALBERT	WAGNER, ALBERT
217 F STREET	DENT, SALLIE	DUGGER, MARGARET
219 F STREET	WALTER, REGINAL	WALTER, REGINAL
236 F STREET	BRIGGS, WILLIAM	VAN HORN, ELECTRA
240 F STREET	MYERS, OLAF	PFLIMLIN, JOSEPH
331 F STREET	CHULA VISTA STAR BUILDING	FUSON'S GARAGE
478 F STREET	KONETZKA, J. A.	GRIFFIN, MARTHA
498 F STREET	ULAND, VIOLA	POLK, LEONA
525 F STREET	JOHNSON, JAME	JOHNSON, JAME
670 F STREET	TAYLOR, FRANK	RAY HALPENNY
39 G STREET	WESSELS, LOUISE	SILVEYRA, AUGUST
155 G STREET	MAUDE, MRS. B. K., BOARDING HOUSE	MAUDE, MRS B. K. BOG. HSE.
211 G STREET	WAGNER, FRED	CESENA, ILDROLFO
227 G STREET	ESTES, JOHN	FORREST, WALTER
236 G STREET	CHAPLIN, MINNIE	SHADLEY, REX
319 - 325 G STREET	HOWE, THOMAS, COURT	HOWE, THOMAS, COURT
329 G STREET	CARREL APARTMENTS	G STREET APARTMENTS
357 G STREET	CHULA VISTA WOMEN'S CLUB HOUSE	CHULA VISTA WOMEN'S CLUB H
372 G STREET	OLMSTEAD, HARRY	ERICKSON, WILLARD

503 G STREET	KINDERGARTEN BUILDING	KINDERGARTEN BUILDING OLD
507 G STREET	LOVE, LYNN	KUBIC, WALTER
511 G STREET	INSECTARY, SAN DIEGO COUNTY	INSECTARY
691 G STREET	PAULSON, GERHARD	GARCIA, ESTHE
35 H STREET	HALL, MARCUS	TATREAU, STEVEN
50 H STREET	TIBEREND, HARRY	LACINA, WAYNE
222 H STREET	GILMAN, CROZIER W.	WILLIAMS, FRANK
33 I STREET	MUELLER, ROBERT	FLYNN, CILIA
95 I STREET	FORTNER, ALEC	BRUCE, LLOYD
209 I STREET	SUMNER, CHESTER	LEE, KENNETH
215 I STREET	SHARP, WALTE	MOREY, CURT
221 I STREET	SELLER, NELLIE	SCHUMAKER, ROBERT
264 I STREET	SMITH, CLARA	FOUR SEASON DAY CARE CENTE
395 I STREET	MASTERS, HENRY	ALVARADO HOUSE, ARTHUR
447 I STREET	DeGONZALES, FRED	DeGONZALES, GLORIA
225 J STREET	CODINGTON HOUSE, JOSEPH	WELLS HOUSE, NINA
263 J STREET	JUDSON HOUSE, DAVID	JARVIS HOUSE, THILDA
279 J STREET	DAY HOUSE, VICTOR	DAY HOUSE, AUTHUR
379 J STREET	HAINES HOUSE, EVELYN	CURTIS HOUSE, THEODORE
436 J STREET	STONE HOUSE, JAMES	TOOK HOUSE, PEARL
88 K STREET	GRAINGER HOUSE, BLANCH	GRAINGER HOUSE, BLANCH
152 K STREET	CARTER HOUSE, THOMAS	PENCE HOUSE, JOHN
170 K STREET	MOBLEY HOUSE, OWEN	VANNATTA HOUSE, JOAN
180 K STREET	MILLER HOUSE, BASIL	HARPER HOUSE, ROBERT
190 K STREET	HALLIBURTON HOUSE, ERLE	DAVIS HOUSE, JAMES
198 K STREET	SMITH, ANDREW	ANDERSON, WILLIAM
200 K STREET	RUSS HOUSE, EDMOND	DEVANEY HOUSE, THOMAS
388 K STREET	DAVIDSON HOUSE, J. C.	SIMAS HOUSE, JOAN
29 L STREET	RIACH HOUSE, WILLIAM	WULFF HOUSE, VICTOR
49 AND S1 L STREET	COUNTRY CLUB BUNGALOWS	COUNTRY CLUB BUNGALOWS
88 L STREET	SAN DIEGO COUNTRY CLUB	SAN DIEGO COUNTRY CLUB
355 FIRST AVENUE	PHILLIPS HOUSE, WILLIAM	JOYCE HOUSE, DELMAR
435 FIRST AVENUE	SALLMON HOUSE, WILLIAM	SMITH HOUSE, WILLIAM
550 FIRST AVENUE	TUTTLE, WARREN	WILLIAMS HOUSE, HARRY
707 FIRST AVENUE	NEPTUNE HOUSE, FERNANDO	KELL HOUSE, JAMES
747 FIRST AVENUE	PALMER HOUSE, ARTHUR	ABBOTT HOUSE, IDELLA
834 FIRST AVENUE	EDGECOMB HOUSE, MAE	SHEFFIELD HOUSE, JOHN
840 FIRST AVENUE	DREW HOUSE, MARY	WITTMAYER, MARGARET
3 NORTH SECOND AVENUE	BULMER HOUSE, JAMES	BULMER HOUSE

44 NORTH SECOND AVENUE	GILLETTE HOUSE, EDWARD	DARLING HOUSE, MARCELLA
54 NORTH SECOND AVENUE	PARK, ROBERT	PARK HOUSE, ROBERT
10 SECOND AVENUE	WRIGHT HOUSE, LUCIOUS	WRIGHT HOUSE, LUCIOUS
20 SECOND AVENUE	BARROWS HOUSE, ROSE	ROBBINS HOUSE, GERALD
25 SECOND AVENUE	BENTON, ROY	SIMPSON HOUSE, MARY
28 SECOND AVENUE	DEAN HOUSE, PHILENA	DEAN HOUSE, PHILENA
145 SECOND AVENUE	GEORGE HOUSE, ROBERT	SIEWERT HOUSE, TIMOTHY
221 SECOND AVENUE	CHRISTY HOUSE, JAMES	KIRWAN HOUSE, JOHN
238 SECOND AVENUE	DAVIDSON HOUSE, JOHN	DAVIDSON HOUSE, JOHN
272 SECOND AVENUE	CAMPBELL HOUSE, ERNEST	VILLARINO HOUSE, ROBERT
280 SECOND AVENUE	JOHNSON HOUSE, LEMANDO	MERCADO HOUSE, MARY
320 SECOND AVENUE	CROCKETT HOUSE, ALLISON	CROCKETT HOUSE, ALLISON
333 SECOND AVENUE	CARMICHAEL HOUSE, PHOEBE	COMBS HOUSE, BERTHA
365 SECOND AVENUE	PELL HOUSE, EDWARD	ALONZO HOUSE, JAMES
422 SECOND AVENUE	SOPER HOUSE, WARREN	HANSEN HOUSE, MARIE
426 SECOND AVENUE	SLANGE HOUSE, MARIA	CHRISTIAN CHURCH HOUSE
611 SECOND AVENUE	BRONSON CARRIAGE HOUSE	BRONSON CARRIAGE HOUSE
613 SECOND AVENUE	BRONSON HOUSE, BYRON	BRONSON HOUSE, BYRON
614 SECOND AVENUE	DAVIES, NADINE	BURCH HOUSE, LEE
618 SECOND AVENUE	ROGERS HOUSE, GREG	ROGERS HOUSE, GREG
634 SECOND AVENUE	CLAY HOUSE, PERCY	BONNET HOUSE, TIMOTHY
642 SECOND AVENUE	GARRETTSON-FRANK HOUSE	FRANK HOUSE
644 SECOND AVENUE	MacDONALD HOUSE, JENNIE	Mc CALL HOUSE, JEAN
648 SECOND AVENUE	TUCKER HOUSE, RICHARD	FLEMING HOUSE, WILLIAM
654 SECOND AVENUE	BOOKS HOUSE, JOSEPH	WILLIAMS HOUSE
674 SECOND AVENUE	DUNBAR HOUSE, GEORGE	MONEY HOUSE, JANE
682 SECOND AVENUE	TTEZISE HOUSE, RICHARD	OYA HOUSE, PAUL
692 SECOND AVENUE	EUSTIS HOUSE, PERCY	WILLIAMS HOUSE, WALTER
700 SECOND AVENUE	CHAPMAN HOUSE, JOHN	BROWMAN HOUSE, HARREL
730 SECOND AVENUE	MONROE HOUSE, JOHN	DOWDLE HOUSE, DOROTHY
744 SECOND AVENUE	BURSIDES HOUSE, ALEX	CONDON HOUSE, CASEY
289 THIRD AVENUE	SMITH BUILDING, CHARLES	LAS CASUELAS
301 - 305 THIRD AVENUE	MELVILLE BLOCK	SECURITY TRUST BANK BUILDIN
337 THIRD AVENUE	S. D. G. & E. BUILDING	YAEI'S BRIDAL BOUTIQUE
351 THIRD AVENUE	COOMBS APARTMENTS	RABAY BUILDING
416 THIRD AVENUE	EL PRIMERO HOTEL	EL PRIMERO HOTEL
627 THIRD AVENUE	SHILLING, ALBERT	MALCOLM HOUSE, JAMES
638 THIRD AVENUE	ALEXANDER HOUSE, SHERMAN	SCIN HOUSE, ALBERT
64 FOURTH AVENUE	FRESHOUR HOUSE, LEONARD	MILLIAN HOUSE, JACK
82 FOURTH AVENUE	HOWARD HOUSE, HARRY	GOINS HOUSE, ONA
88 FOURTH AVENUE	NELSON HOUSE, CARL	WESTWOOD HOUSE, LEROY
103 FOURTH AVENUE	ANDERSON HOUSE, CHARLES	ANDERSON HOUSE, CHARLES
214 FOURTH AVENUE	COFFROTH HOUSE, WILLIAM	SWOPES, HIAWATHA
419 FOURTH AVENUE	LYLE HOUSE, ALEX	BRIGS HOUSE, ROY

426 FOURTH AVENUE	RENICK HOUSE, CALLIE	MATTES HOUSE, ALDA
432 FOURTH AVENUE	RENICK HOUSE, ROLAND	STEVENS HOUSE, FLORENCE
515 FOURTH AVENUE	CARVER HOUSE, MAX	BURNS HOUSE, HUGH
521 FOURTH AVENUE	TAYLOR HOUSE, EMANUEL	TAYLOR HOUSE, EMANUEL
620 FOURTH AVENUE	PANKAU HOUSE, HERMAN	PANKAU HOUSE, ROBERT
672 FOURTH AVENUE	SCHNEIDER HOUSE, FREDERICK	JUDD HOUSE, DONALD
772 FOURTH AVENUE	SLAUSON HOUSE, CLARENCE	YAMADA HOUSE, KAZUMI
780 FOURTH AVENUE	BERGEN HOUSE, NELLIE	HOLMES HOUSE, NED
<i>9th FIFTH AVE</i> 114 FIFTH AVENUE	TESSITORE HOUSE, VICTOR	VIESCA HOUSE, RODRIGO
171 FIFTH AVENUE	HAYNES HOUSE, WILLIAM	OLIN HOUSE, CLARENCE
230 FIFTH AVENUE	KINMORE, ELMER	LINDQUIST, NORMA
254 FIFTH AVENUE	SETTE HOUSE, MARTIN	WHEYLAND, FLORENCE
278 FIFTH AVENUE	MERCHANT HOUSE, MARY	EUGEN HOUSE, RONALD
540 FIFTH AVENUE	ENGBRETSON-STAFFORD HOUSE	STAFFORD HOUSE

CRIPPS REFERENCED? AS M.M. 11/10/12

LOCATION	HISTORIC NAME	COMMON NAME
337 DEL MAR AVENUE	NORMAN HOUSE, FRANCES	ALLEN HOUSE, KATHLEEN
231 MADRONA STREET	LOVELL HOUSE, LESLIE	ALTAMIRANO HOUSE, GRACE
186 CYPRESS STREET	WILLIAMS HOUSE, DANIEL	AMBRIZ HOUSE
693 DEL MAR AVENUE	ANDERSON HOUSE, MARY	ANDERSON HOUSE, MARY
155 CYPRESS STREET	COWLISHAW HOUSE, EBEN	ARNOLD HOUSE, HAZEL
329-331 DEL MAR AVENUE	AVILLA COURT	AVILLA COURT
616 DEL MAR AVENUE	SMITH HOUSE, EDWIN SR.	BANALES HOUSE, LEOPOLDO
406 CHURCH AVENUE	PRAY HOUSE, RICHARD	BECKER HOUSE, MERLE
25 MADISON AVENUE	EDWARDS HOUSE, JOSEPH	BLUM HOUSE, DORIA
34 DAVIDSON STREET	BOLTZ HOUSE, CARL	BOLTZ HOUSE, MARY
410 CHURCH AVENUE	MIKKELSON HOUSE, ELMER	BUDEL HOUSE, REX
630 DEL MAR AVENUE	RIFE HOUSE, GEORGE	BULLEN HOUSE, ROSEMARY
255 SEA VALE STREET	CAPWELL HOUSE, WALLACE	CAPWELL HOUSE, WALLACE
633 DEL MAR AVENUE	COPELAND HOUSE, DWIGHT	CARYAJAL HOUSE, RAY
681 DEL MAR AVENUE	FRANCISCO HOUSE, MARY	CASA BELMONTES
292 SEA VALE STREET	PAYTON HOUSE, HAROLD	CHANEY HOUSE, NEWTON
124 HILLTOP DRIVE	CHRISTY HOUSE, LEO	CHRISTY HOUSE, LEO
288 CENTER STREET	KELLER BUILDING, FRANK	CHURCH STORAGE BUILDING
222 ALVARADO STREET	PROCTOR HOUSE, ALBERT	CLARK HOUSE, CHRISTIAN
LOCATION	HISTORIC NAME	COMMON NAME
82 COOK COURT	COOK HOUSE, HAZEL GOES	COOK HOUSE, HAZEL GOES
181 MADRONA STREET	PICKERING HOUSE, ALMOND	COOLEY HOUSE, BARBARA
210 DAVIDSON STREET	HAINES HOUSE, ALFRED	CORDREY HOUSE, HANCEL
654 DEL MAR AVENUE	SUMNER HOUSE, HOLLAWAY	DAMELIO HOUSE, ROSE
516-518 FLOWER STREET	DAYSON COURT	DAYSON COURT
256 DEL MAR AVENUE	DEL MAR COURT	DEL MAR COURT
540 DEL MAR AVENUE	EDMONDS HOUSE, WARNER	DIAS HOUSE, HENRY
639 DEL MAR AVENUE	HARKINS HOUSE, FLORENCE	DIAS HOUSE, HENRY
666 DEL MAR AVENUE	CODINGTON HOUSE, JOSEPH	DUCKWORTH-FORD HOUSE
153 KEARNEY STREET	THOMPSON HOUSE, ORMSBY	DUDBRIDGE HOUSE, NELLIE
721 CHURCH AVENUE	STURDEVANT HOUSE, JENNIE	DUNAWAY HOUSE, MARIA
235 MADRONA STREET	TUCHECK HOUSE, JEROME	DUPUIS HOUSE, JOSEPH
46 MADISON AVENUE	LARGE HOUSE, ELIZABETH	EARLY HOUSE, ROSS
151 LANDIS AVENUE	BARBER HOUSE, ALBERT	EITZEN HOUSE, ABRAHAM
689 DEL MAR AVENUE	WORTHINGTON HOUSE, GEORGE	EL NIDO
284 TWIN OAKS AVENUE	EULITT HOUSE, MARY	EULITT HOUSE, MARY
500 FLOWER STREET	FLOWER STREET APARTMENTS	FLOWER STREET APARTMENT
189 MADRONA STREET	FUQUA HOUSE, ELSÉN	FUQUA HOUSE, ELSÉN
42 PALOMAR DRIVE WEST	POPE HOUSE, HAROLD	GARCIA HOUSE, FRANCISCO
670 DEL MAR AVENUE	HOLTAM HOUSE, JOSEPH	GEVER HOUSE, ROBERT
163 CYPRESS STREET	FARR HOUSE, GRACE	GOSS HOUSE, GAIL
344 HILLTOP DRIVE	DUPREE-GOULD HOUSE	GOULD HOUSE
192 MADRONA STREET	NICKOLS HOUSE, CHARLES	GREEN HOUSE, JOHN
213 CHURCH AVENUE	HARDESTY HOUSE, EUGENE	HARDESTY HOUSE, EUGENE
649 CHULA VISTA STREET	REESE HOUSE, DAVID	HATHAWAY HOUSE, DONALD

LOCATION	HISTORIC NAME	COMMON NAME
287 TWIN OAKS AVENUE	NEECE HOUSE, ARTHUR	HAYDEN HOUSE, KENNETH
286 SEA VALE STREET	RIESLAND HOUSE, AARON	HENDRICKS HOUSE, ROBERT
89 COUNTRY CLUB DRIVE	THURSTON HOUSE, THEODORE	HODGE HOUSE, JAMES
374 ROOSEVELT STREET	SKINNER HOUSE, MARK	HOLLISTER HOUSE, JAY
745 CHURCH AVENUE	HOLT HOUSE, ANDREW	HOLT HOUSE, CARL
680 DEL MAR AVENUE	SMITH HOUSE, EDWIN JR.	HOOVER HOUSE, MAXINE
769 BROADWAY	FISCHER HOUSE, HENRY	HOV HOUSE, OLEN
222 SEA VALE STREET	INSKEEP HOUSE, CHARLES	INSKEEP HOUSE, CHARLES
738 ELM AVENUE	SCHOONOVER HOUSE, ALBERT	JENSEN HOUSE, CARL
354 CHURCH AVENUE	METHODIST ESPISCOPAL PARSONS	KNEISS HOUSE, HELEN
70 BROADWAY	AUTO COURT, AQUA VISTA	LAD'S MOTEL
251 MADRONA STREET	MAYNE HOUSE, WILLIAM	LALICATA HOUSE, DOMINICK
351 CHURCH AVENUE	MARSHALL HOUSE, CAROLINE	LANG HOUSE, SYLVIA
240 SEA VALE STREET	CLEVELAND HOUSE, ANNIE	LeBRECQUE HOUSE, JACK
175 MADRONA STREET	DAVIES HOUSE, JESSIE	LENNEY HOUSE, FRANCES
40 PALOMAR DRIVE	ADRIAN HOUSE, EUGENE	LEON HOUSE, ARTURO
336 CHURCH AVENUE	JONES HOUSE, S. H.	LOUSTALET HOUSE, EDWARD
388 DEL MAR AVENUE	VAUGHN HOUSE, ROBERT	MADSEN HOUSE, DANIELLE
268 MADRONA STREET	CHARLES HOUSE, ARTHUR	MADSEN HOUSE, JOHN
715 ELM AVENUE	FOOT HOUSE, FRED	MARSH HOUSE, LARRY
238 DEL MAR AVENUE	STEWART HOUSE, ELMER	Mc DERMOTT HOUSE, DERMO
877 COUNTRY CLUB DRIVE	CONKLIN HOUSE, CLAUDE	MCCANN HOUSE, BARBARA
266 TWIN OAKS AVENUE	THIEBAUD HOUSE, L. A.	MCKINNEY HOUSE, TROY
665 DEL MAR AVENUE	MILLER HOUSE, MARY	MILLER HOUSE, MARY
169 MADRONA STREET	KINNARD HOUSE, SALLIE	MOE HOUSE, OLE
96 OAKLAWN AVENUE	NATION HOUSE, JAMES	NATION HOUSE, JAMES
225 GARRETT AVENUE	MCCREA HOUSE, HARRY	NOVELLI HOUSE, JOSE
196 CYPRESS STREET	SCHROEDER HOUSE, WILDEMAR	O'CONNELL HOUSE, WILLIAM
382-384 DEL MAR AVENUE	WOMAN'S CLUBHOUSE	OLD CLUBHOUSE BUILDING
275 ASH STREET	KURFURST HOUSE, JOHN	OLD COMMUNITY HOSPITAL
164 MADRONA STREET	CHAPPELL HOUSE, G. C.	PELEKAI HOUSE, DALLAS
224 GLOVER STREET	MCPHERSON HOUSE, BENJAMIN	PEOPLES HOUSE, CASEY
170 BRIGHTWOOD AVENUE	JOHNSON HOUSE, BERTHA	PILGRIM CHURCH HOUSE
248 DEL MAR AVENUE	PROCTOR HOUSE, MERRILL	PROCTOR HOUSE, MERRILL
361 ROOSEVELT STREET	SNOW HOUSE, HENRY	RANDLE HOUSE, DAVID
617 DEL MAR AVENUE	FISHER HOUSE, FRANCES	ROBERTS HOUSE, GLEN
219 SEA VALE STREET	SKINNER HOUSE, MARK	SAXTON HOUSE, MARY
314 TWIN OAKS AVENUE	CROCKETT HOUSE, MARY	SCOTT HOUSE, ELECTRA
741 ELM AVENUE	WHITTINGHAM HOUSE, JOSEPH	SHEA HOUSE, ADELLA
198 MADRONA STREET	MOE HOUSE, OSCAR	SHIVER HOUSE, CLARA
180 CYPRESS STREET	VAUGHN HOUSE, ELIZABETH	SHORT HOUSE, NATHAN
706 TWIN OAKS AVENUE	MURCH HOUSE, LILA	SORIANO HOUSE, JESUS
321 DEL MAR AVENUE	CROCKETT HOUSE, LAURA	SOUTHWORTH HOUSE, WILMA
283 TWIN OAKS AVENUE	PERMAN HOUSE, JOSEPH	SPENCER HOUSE, NORA
700 TWIN OAKS AVENUE	MORRISON HOUSE, SADIE	STAUFFER HOUSE, JOHN

LOCATION	HISTORIC NAME	COMMON NAME
210 SEA VALE STREET	SNOW HOUSE, HENRY	STELL HOUSE, DONALD
183 MADRONA STREET	BUCK HOUSE, FRED	STEVENS HOUSE, JAMES.
742 ALPINE AVENUE	BUSH HOUSE, AGNES	SWEAT HOUSE, FORREST
659 DEL MAR AVENUE	TABER HOUSE, RAY	TABER HOUSE, MARGARET
353 CHURCH AVENUE	GLADDEN HOUSE, ABBY	TAKASHIMA HOUSE, RONALD
210 LANDIS AVENUE	LINDENMOOD HOUSE, JAMES	TAYLOR HOUSE, IRA
202 & 206 MADRONA ST	ST. JOHN'S EPISCOPAL CHURCH	TEMPLE BETH SHOLOM
30 OAKLAWN AVENUE	SALMON HOUSE, EMANUEL	TSUYAKE HOUSE, YAMADA
144 DEL MAR AVENUE NO	BUSH HOUSE, OAKLEY	VETICIN HOUSE, MARIAN
629 DEL MAR AVENUE	VILLEGAN HOUSE, TERESA	VILLEGAN HOUSE, TERESA
220 FIG STREET	SEARLE HOUSE, EDWARD	WAGNER HOUSE, BERYL
237 GARRETT AVENUE	WORTHINGTON HOUSE, PAUL	WARDEN HOUSE, WILLIAM
287 CHURCH AVENUE	McCLAIN HOUSE, RAVENDA	WATROUS HOUSE, ANSEL
231 ALVARADO STREET	REISLAND HOUSE, MARIE	WAVRIN HOUSE, JOSEPH
170 CYPRESS STREET	SPRING HOUSE, L. G.	WEATHERBIE HOUSE, RUTH
273 ALVARADO STREET	DARROW HOUSE, EDITH	WILKINSON HOUSE, AGNES
664 DEL MAR AVENUE	KRAFT HOUSE, WILLIAM	YACOB HOUSE, VICTORIA
285 SEA VALE STREET	ALBRIGHT HOUSE, FRANK	YUFE HOUSE, JACK

CROSS REFERENCED BY HISTORIC NAME

LOCATION	HISTORIC NAME	COMMON NAME
40 PALOMAR DRIVE	ADRIAN HOUSE, EUGENE	LEON HOUSE, ARTURO
285 SEA VALE STREET	ALBRIGHT HOUSE, FRANK	YUPE HOUSE, JACK
693 DEL MAR AVENUE	ANDERSON HOUSE, MARY	ANDERSON HOUSE, MARY
70 BROADWAY	AUTO COURT, AQUA VISTA	LAD'S MOTEL
329-331 DEL MAR AVENUE	AVILLA COURT	AVILLA COURT
151 LANDIS AVENUE	BARBER HOUSE, ALBERT	EITZEN HOUSE, ABRAHAM
34 DAVIDSON STREET	BOLTZ HOUSE, CARL	BOLTZ HOUSE, MARY
163 MADRONA STREET	BUCK HOUSE, FRED	STEVENS HOUSE, JAMES
742 ALPINE AVENUE	BUSH HOUSE, AGNES	SWEAT HOUSE, FORREST
144 DEL MAR AVENUE NO.	BUSH HOUSE, OAKLEY	VETICIN HOUSE, MARIAN
255 SEA VALE STREET	CAPWELL HOUSE, WALLACE	CAPWELL HOUSE, WALLACE
164 MADRONA STREET	CHAPPELL HOUSE, C. C.	FELEKAI HOUSE, DALLAS
268 MADRONA STREET	CHARLES HOUSE, ARTHUR	MADSEN HOUSE, JOHN
124 HILLTOP DRIVE	CHRISTY HOUSE, LEO	CHRISTY HOUSE, LEO
240 SEA VALE STREET	CLEVELAND HOUSE, ANNIE	LOBRECQUE HOUSE, JACK
606 DEL MAR AVENUE	CODINGTON HOUSE, JOSEPH	DUCKWORTH-FORD HOUSE
877 COUNTRY CLUB DRIVE	CONKLIN HOUSE, CLAUDE	MCCANN HOUSE, BARBARA
62 COOK COURT	COOK HOUSE, HAZEL GOES	COOK HOUSE, HAZEL GOES
633 DEL MAR AVENUE	COPELAND HOUSE, DWIGHT	CARVAJAL HOUSE, RAY
155 CYPRESS STREET	COWLISHAW HOUSE, EBEN	ARNOLD HOUSE, HAZEL
321 DEL MAR AVENUE	CROCKETT HOUSE, LAURA	SOUTHWORTH HOUSE, WILMA
314 TWIN OAKS AVENUE	CROCKETT HOUSE, MARY	SCOTT HOUSE, ELECTRA
273 ALVARADO STREET	DARROW HOUSE, EDITH	WILKINSON HOUSE, AGNES
175 MADRONA STREET	DAVIES HOUSE, JESSIE	LENNEY HOUSE, FRANCES
516-518 FLOWER STREET	DAYSON COURT	DAYSON COURT
256 DEL MAR AVENUE	DEL MAR COURT	DEL MAR COURT
344 HILLTOP DRIVE	DUPREE-GOULD HOUSE	GOULD HOUSE
640 DEL MAR AVENUE	EDMONDS HOUSE, WARNER	DIAS HOUSE, HENRY
25 MADISON AVENUE	EDWARDS HOUSE, JOSEPH	BLUM HOUSE, DORIA
284 TWIN OAKS AVENUE	EULITT HOUSE, MARY	EULITT HOUSE, MARY
163 CYPRESS STREET	FARR HOUSE, GRACE	GOSS HOUSE, GAIL
769 BROADWAY	FISCHER HOUSE, HENRY	HOY HOUSE, OLEN
617 DEL MAR AVENUE	FISHER HOUSE, FRANCES	ROBERTS HOUSE, GLEN
500 FLOWER STREET	FLOWER STREET APARTMENTS	FLOWER STREET APARTMENT
715 ELM AVENUE	FOOT HOUSE, FRED	MARSH HOUSE, LARRY
681 DEL MAR AVENUE	FRANCISCO HOUSE, MARY	CASA BELMONTES
189 MADRONA STREET	FUQUA HOUSE, ELSEN	FUQUA HOUSE, ELSEN
353 CHURCH AVENUE	GLADDEN HOUSE, ABBY	TAKASHIMA HOUSE, RONALD
210 DAVIDSON STREET	HAINES HOUSE, ALFRED	CORDREY HOUSE, HANSEL
213 CHURCH AVENUE	HARDESTY HOUSE, EUGENE	HARDESTY HOUSE, EUGENE
639 DEL MAR AVENUE	HARKINS HOUSE, FLORENCE	DIAS HOUSE, HENRY
LOCATION	HISTORIC NAME	COMMON NAME
745 CHURCH AVENUE	HOLT HOUSE, ANDREW	HOLT HOUSE, CARL
670 DEL MAR AVENUE	HOLTAM HOUSE, JOSEPH	GEVER HOUSE, ROBERT
222 SEA VALE STREET	INSKEEP HOUSE, CHARLES	INSKEEP HOUSE, CHARLES

LOCATION	HISTORIC NAME	COMMON NAME
170 BRIGHTWOOD AVENUE	JOHNSON HOUSE, BERTHA	PILGRIM CHURCH HOUSE
336 CHURCH AVENUE	JONES HOUSE, S. H.	LOUSTALET HOUSE, EDWARD
288 CENTER STREET	KELLER BUILDING, FRANK	CHURCH STORAGE BUILDING
189 MADRONA STREET	KINNARD HOUSE, SALLIE	MOE HOUSE, OLE
664 DEL MAR AVENUE	KRAFT HOUSE, WILLIAM	YACOB HOUSE, VICTORIA
275 8TH STREET	KURFURST HOUSE, JOHN	OLD COMMUNITY HOSPITAL
46 MADISON AVENUE	LARGE HOUSE, ELIZABETH	EARLY HOUSE, ROSS
210 LANDIS AVENUE	LINDENMOOD HOUSE, JAMES	TAYLOR HOUSE, IRA
231 MADRONA STREET	LOVELL HOUSE, LESLIE	ALTAMIRANO HOUSE, GRACE
351 CHURCH AVENUE	MARSHALL HOUSE, CAROLINE	LANG HOUSE, SYLVIA
251 MADRONA STREET	MAYNE HOUSE, WILLIAM	LALICATA HOUSE, DOMINICK
287 CHURCH AVENUE	McCLAIN HOUSE, RAYENDA	WATROUS HOUSE, ANSEL
225 GARRETT AVENUE	McCREA HOUSE, HARRY	NOVELLI HOUSE, JOSE
224 GLOVER STREET	McPHERSON HOUSE, BENJAMIN	PEOPLES HOUSE, CASEY
354 CHURCH AVENUE	METHODIST EPISCOPAL PARSONS	KNEISS HOUSE, HELEN
410 CHURCH AVENUE	MIKKELSON HOUSE, ELMER	BUDEL HOUSE, REX
665 DEL MAR AVENUE	MILLER HOUSE, MARY	MILLER HOUSE, MARY
196 MADRONA STREET	MOE HOUSE, OSCAR	SHIVER HOUSE, CLARA
700 TWIN OAKS AVENUE	MORRISON HOUSE, SADIE	STAUFFER HOUSE, JOHN
706 TWIN OAKS AVENUE	MURCH HOUSE, LILA	SORIANO HOUSE, JESUS
96 OAKLAWN AVENUE	NATION HOUSE, JAMES	NATION HOUSE, JAMES
287 TWIN OAKS AVENUE	NEECE HOUSE, ARTHUR	HAYDEN HOUSE, KENNETH
192 MADRONA STREET	NICKOLS HOUSE, CHARLES	GREEN HOUSE, JOHN
337 DEL MAR AVENUE	NORMAN HOUSE, FRANCES	ALLEN HOUSE, KATHLEEN
292 SEA VALE STREET	PAYTON HOUSE, HAROLD	CHANEY HOUSE, NEWTON
283 TWIN OAKS AVENUE	PERMAN HOUSE, JOSEPH	SPENCER HOUSE, NORA
181 MADRONA STREET	PICKERING HOUSE, ALMOND	COOLEY HOUSE, BARBARA
42 PALOMAR DRIVE WEST	POPE HOUSE, HAROLD	GARCIA HOUSE, FRANCISCO
406 CHURCH AVENUE	PRAY HOUSE, RICHARD	BECKER HOUSE, MERLE
222 ALVARADO STREET	PROCTOR HOUSE, ALBERT	CLARK HOUSE, CHRISTIAN
248 DEL MAR AVENUE	PROCTOR HOUSE, MERRILL	PROCTOR HOUSE, MERRILL
649 CHULA VISTA STREET	REESE HOUSE, DAVID	HATHAWAY HOUSE, DONALD
231 ALVARADO STREET	REISLAND HOUSE, MARIE	WAVRIN HOUSE, JOSEPH
286 SEA VALE STREET	REISLAND HOUSE, AARON	HENDRICKS HOUSE, ROBERT
630 DEL MAR AVENUE	RIFE HOUSE, GEORGE	BULLEN HOUSE, ROSEMARY
30 OAKLAWN AVENUE	SALMON HOUSE, EMANUEL	TSUYAKE HOUSE, YAMADA
738 ELM AVENUE	SCHOONOVER HOUSE, ALBERT	JENSEN HOUSE, CARL
196 CYPRESS STREET	SCHROEDER HOUSE, WILDEMAR	O'CONNELL HOUSE, WILLIAM
220 FIG STREET	SEARLE HOUSE, EDWARD	WAGNER HOUSE, BERYL
374 ROOSEVELT STREET	SKINNER HOUSE, MARK	HOLLISTER HOUSE, JAY
219 SEA VALE STREET	SKINNER HOUSE, MARK	SAXTON HOUSE, MARY
680 DEL MAR AVENUE	SMITH HOUSE, EDWIN JR.	HOOVER HOUSE, MAXINE
616 DEL MAR AVENUE	SMITH HOUSE, EDWIN SR.	BANALES HOUSE, LEOPOLDO
361 ROOSEVELT STREET	SNOW HOUSE, HENRY	RANDLE HOUSE, DAVID
210 SEA VALE STREET	SNOW HOUSE, HENRY	STELL HOUSE, DONALD

LOCATION	HISTORIC NAME	COMMON NAME
170 CYPRESS STREET	SPRING HOUSE, L. G.	WEATHERBIE HOUSE, RUTH
202 & 208 MADRONA ST	ST. JOHN'S ESPICOPAL CHURCH	TEMPLE BETH SHOLOM
238 DEL MAR AVENUE	STEWART HOUSE, ELMER	Mc DERMOTT HOUSE, DERMO
721 CHURCH AVENUE	STURDEVANT HOUSE, JENNIE	DUNAWAY HOUSE, MARIA
654 DEL MAR AVENUE	SUMNER HOUSE, HOLLAWAY	DAMELIO HOUSE, ROSE
659 DEL MAR AVENUE	TABER HOUSE, RAY	TABER HOUSE, MARGARET
265 TWIN OAKS AVENUE	THIEBAUD HOUSE, L. A.	McKINNEY HOUSE, TROY
153 KEARNEY STREET	THOMPSON HOUSE, ORMSBY	DUDBRIDGE HOUSE, NELLIE
69 COUNTRY CLUB DRIVE	THURSTON HOUSE, THEODORE	HODGE HOUSE, JAMES
235 MADRONA STREET	TUCHECK HOUSE, JEROME	DUPUIS HOUSE, JOSEPH
180 CYPRESS STREET	VAUGHN HOUSE, ELIZABETH	SHORT HOUSE, NATHAN
388 DEL MAR AVENUE	VAUGHN HOUSE, ROBERT	MADSEN HOUSE, DANIELLE
629 DEL MAR AVENUE	VILLEGRAN HOUSE, TERESA	VILLEGRAN HOUSE, TERESA
741 ELM AVENUE	WHITTINGHAM HOUSE, JOSEPH	SHEA HOUSE, ADELLA
186 CYPRESS STREET	WILLIAMS HOUSE, DANIEL	AMBRIZ HOUSE
362-384 DEL MAR AVENUE	WOMAN'S CLUBHOUSE	OLD CLUBHOUSE BUILDING
669 DEL MAR AVENUE	WORTHINGTON HOUSE, GEORGE	EL NIDO
237 GARRETT AVENUE	WORTHINGTON HOUSE, PAUL	WARDEN HOUSE, WILLIAM

Historic Resources Inventory

Name Streets, Avenues, Drives, Courts and
Circles

Historic buildings in the Chula Vista Urban Core

* Not in the draft E. I. R.

Third Avenue

221-223* Leader Department Store. In 1958, The Leader Department Store moved to this address from 250 Third Avenue. It did business here successfully until the 1980s when it was unable to compete with modern malls. After many years of being vacant, it is now being used again for this generation of Chula Vistans.

226 Vogue Theater. The Vogue Theater opened on January 19, 1945, during the last year of World War II. The first feature was "Happy Land" starring Don Ameche, considered one of the ten best movies of 1943. The only other theater on Third Avenue was the Seville Theater at G Street. It was razed in the early 1960s. So the Vogue is the only original theater in Chula Vista that is more than 50 years old. The construction of the Vogue Theater was noteworthy. All four walls are one unit and were all poured at once -- a process called a "monolithic pour." Some 400 cubic yards of cement were poured in a 14-hour period. The building also featured a radically new ventilation system that changes the air in the theater every 3 minutes through giant intake and exhaust channels.

230 Zontek's Cafe. In 1940, three Zontek brothers opened a restaurant at 273 Third Avenue (Irving's Shoe Store today) and operated successfully there for twelve years. In 1953 the brothers made two changes - Stanley left to open Mel's Root Beer, a sandwich shop, at 321 Third Avenue and Blase and Walter built and opened a new Zontek's Cafe at this address (230). Zontek's Cafe operated successfully here from 1953 until 1968. Then it became a restaurant called the House of Munich. Succeeding that was Edelweiss, and now it is a Thai restaurant, Mea Kwan. So this site has been a restaurant for more than half a century.

255 Bank of America. In 1948 the Bank of America moved from its original location at 300 Third Avenue to this location. The Bank subsequently moved in 1956 to its present location at Third Avenue and E Street. As can be seen, this building has since been divided into three addresses -- 253, 255 and 257 Third Avenue. The original bank vault is still in the rear of this building.

261* Sprouse Reitz Store. Sprouse Reitz moved in when the building was built in 1948. Note that the name "Sprouse Reitz" is still in the tile in the sidewalk outside. Sprouse Reitz was a popular "dime store" of the time.

289* Charles Smith Building. Built in 1930 by the Dennstedt Construction Company, this building is a good example of Zig-zag Moderne architecture. Mr. Smith was Chula Vista's first Fire Chief and wanted a fireproof building. The building was occupied by the Sprouse Reitz Company from 1935 until they moved to 261 Third Avenue. The building is as constructed except the ground-level facade has been redone.

299* Carrell Pharmacy. It is unknown when this building was constructed, but it was probably in the early 1920s. In the late 1920s, and at least until 1930, it was occupied by Bryant Electric, whose main sales item was the Majestic Radio. From 1935 until about 2000, a succession of pharmacies occupied this building. In 1954 the building was remodeled to its present configuration.

300* Peoples State Bank. This building was built in 1910 as the "Peoples State Bank." In 1927 it became the "Bank of Italy," and then in 1931 the Bank of Italy changed its name to "Bank of America." In 1948, the Bank of America moved north on Third Avenue to 255. Since 1948 this building has been a Berner-Judd Woman's Clothing store and later it was Roberto's Restaurant. Today the building is occupied by a Christian Science Reading Room. Although the building almost looks tall enough to be a 2-story building, it is only one story. (The second story in the back was added much later.) When the Christian Science folks decided to put in a skylight, they found that they had to cut through some 12 inches of concrete in the ceiling -- the top of the old bank vault!

301-305 The Melville Building. This building has been the most continuously familiar sight on Third Avenue for generations of Chula Vistans. It was built in 1911. It has been used for such businesses as several banks, real estate offices, dental offices, dry goods store, and many more. This building is an example of Eclectic Commercial architecture, although some of the ornamental features have been stripped from this formerly elegant business building.

337* SDG&E Building. This building was constructed in 1926 or 1927 by San Diego Consolidated Gas and Electric Company, the predecessor to SDG&E. The front of the building has recently been altered for new uses.

416* El Primero Hotel. This hotel was built in 1930, was the first modern hotel in Chula Vista, and is certainly the oldest hotel in Chula Vista. The hotel is an important example of Zig-zag Moderne style of architecture, and the new owners have restored the building to its original look.

F Street

202* Albert Wagner House. This unaltered bungalow was constructed in 1925. The house is a good example of bungalow style with the Craftsman influence demonstrated by the exposure of structural members.

217* Sallie Dent House. This bungalow, in Greek Revival architectural style, was constructed in 1908 or 1909.

219* Reginald Walters House. This house was built in 1908. The house is classified as a Pyramidal Fold House and is one of the few remaining examples of this architecture in the city.

236* William Briggs House. This bungalow, built circa 1924, is unaltered. Although now a business, this carefully designed bungalow retains its integrity of design and materials. The porch exhibits careful attention to detail and fine carpentry work.

240* Olaf Myers House. This house was built in 1926 and the bungalow is unaltered except that the porch has been enclosed, cement steps and an iron railing added. This house represents a good example of the compact rectangular bungalows of the 1920s.

276 Congregational Church. The original Congregational Church was built on this site in 1894, and was the first church in Chula Vista. In 1911 they doubled the size of the church with an addition. Then in 1951 they razed those structures and built the buildings you see now. So this site has been occupied by the Congregational Church for more than 100 years, and in their present buildings for more than 50 years.

279* Security Pacific Bank. The Security Pacific Bank was originally located in the Melville Building, at the corner of Third and F, but in 1953 had this building constructed. When the bank occupied the Melville Building, it installed a large outdoor clock on the corner of that building. When the bank moved here they brought that outdoor clock along and mounted it on the southeast corner of this building. As you can see, the current bank (Pacific Trust Bank) is continuing that tradition.

G Street

357* Woman's Club. Completed in 1928, the Woman's Club has been unaltered ever since. The Woman's Club is significant as an important example of Spanish-Colonial architecture, and was designed by Edgar Ulrich, an important San Diego architect who also designed some of the Classic Renaissance buildings on the University of San Diego campus, St. Charles Borromeo Church in Point Loma, and Casa de Mafiana Hotel in La Jolla.

Broadway

769* Henry Fischer House. Built circa 1891, the Fischer House is a one and one-half story Victorian home featuring high, hipped and gable roof with a boxed cornice, carved brackets, and a paneled frieze. Other details include wide, horizontal shiplap siding, an interior brick chimney and an open wooden porch. The house is significant as one of the few remaining 19th Century Victorians in Chula Vista.

Landis Avenue

210* James Lindemoed House. Built in 1923, this one-story bungalow features a medium front-facing gable roof with wide eaves, exposed rafter ends, and visible support beam ends. The horizontal clapboard siding on this house has been laid in a one wide, two narrow, one wide board pattern. The house is a good example of the bungalows of the 1920s that were built in Chula Vista.

* Not in the draft E. I. R.

Response to Letter I
Foley & Lardner LLP, Attorneys at Law

- I-1** This comment states that the list of historically significant buildings discussed in the DEIR is incomplete. As stated in Section 5.3, page 5-78, the UCSP DEIR incorporates by reference the GPU EIR which references the City's 1985 Historic Resources Inventory. While the majority of the sites inventoried for the 1985 survey occur outside of the UCSP Subdistricts area, the DEIR has been revised to more directly make this point. Section 5.3.1.4 in the DEIR, Historic Sites in the UCSP Area, has been revised to include a description of the City's 1985 Historic Resources Inventory on page 5-86 and an additional subsection on page 5-89 entitled "Other Sites of Historical Interest" that includes identification of the People's State Bank, El Primero Hotel, and the Charles Smith Building as sites of historical interest. The existing inventory will also be considered, as applicable, in the future evaluation of development proposals on or adjacent to these sites. The conclusions in the DEIR regarding potential significant impacts to historical resource remain the same and mitigation will continue to be required as determined based on subsequent review of individual site specific development proposals. See also responses to Comments L-2 and L-3.
- I-2** See response to Comment I-1 above.
- I-3** The City's 1985 Historic Inventory (Exhibit E to this comment letter) has been added as a reference in the EIR and therefore is included in the public record.
- I-4** See responses to Comment I-1, L-2, and L-3.
- I-5** This comment states that the development regulations in the Village District will encourage the destruction of historic buildings and the obstruction of their visibility. As presented in the DEIR on pages 5-94 and 5-96, the Urban Core Specific Plan contains development regulations and design guidelines that emphasize the conservation and integration of historical architectural resources into Urban Core redevelopment. Of note, the Building Additions and Renovation Guidelines for the Village District contained in the Plan include measures to preserve traditional features and decoration; remove elements inconsistent with original façade; renovate storefronts; retain, repair or replace windows; retain, repair, refinish, or replace doors; retain, repair or replace awnings; effectively paint, waterproof, repair and clean surfaces/facades; and conceal or carefully integrate any seismic retrofitting. Additionally, as identified in DEIR Sections 3.4.3 and 3.4.4, the UCSP contains setbacks, stepbacks, and controls on bulk and scale that provide adequate protections to adjacent historic resources.
- I-6** This comment states that the UCSP would violate the intent and purposes of Chapter 19.80 of the Chula Vista Municipal Code. With the approval of new land

use designations under the 2005 General Plan, new zoning regulations, in particular mixed use and urban core residential zoning districts, are required to be developed to ensure the systematic implementation of General Plan (GP). This requirement to have zoning consistent with the City's General Plan is established in CVMC Section 19.06.030. The UCSP is the first in a series of significant zoning documents that are anticipated to implement the vision established by the 2005 General Plan.

At the same time the provisions of CVMC 19.80 need to be considered in terms of managing growth and ensuring the quality of life standards are maintained for the residents of the City of Chula Vista. The UCSP Chapter IX includes an assessment of infrastructure and public services as required by State Planning and Zoning Law (Govt. Code 65451). In addition, the UCSP EIR includes an evaluation of the quality of life thresholds at a programmatic level and outlines mitigation measures which would be applied on a project-by-project basis commensurate with development over the course of the plan's 20-year implementation (see DEIR Sections 5.7, 5.8, 5.11 and 5.12). The limitations on potential zoning changes, referenced in the comment, are a procedural consistency step identified in CVMC 19.80.070. The information in the EIR, specifically Sections 5.7, 5.8, 5.11 and 5.12, as well as the UCSP Chapter IX, provide the basis for the determination that the UCSP complies with CVMC 19.80. The analysis, including information from the DEIR and UCSP, will be included in the staff report prepared for the UCSP adoption and presented to the City Council for their consideration.

- I-7 Community character impacts to the Village District are analyzed in Section 5.1.3.3 of the DEIR. Visual quality impacts to the Village District are analyzed in Section 5.2.3.2.a of the DEIR.
- I-8 This comment states that the proposed height designation for Third Avenue would adversely change its visual character. General Plan LUT Policy 50.12 states "Along the immediate street frontage of the Third Avenue corridor, primarily between E and G Streets, buildings shall be predominantly low-rise, with mid-rise allowed, provided that upper stories are stepped back from the facade and are architecturally compatible with surrounding development." Therefore as an implementing document of the General Plan, UCSP includes mid-rise development along a limited segment of Third Avenue, subject to the requirement that such development will include appropriate stepbacks and be architecturally compatible with surrounding development. In addition to the mid-rise height regulation, a requirement for a 35-inch stepback along the building frontage is included in the development regulations to ensure that the pedestrian scale is maintained along Third Avenue. Further, the UCSP includes substantial design guidelines to ensure compatible development. For example, the UCSP Design Guidelines, Chapter VII include Goals (VII.A.3), Design Principles

(VII.D.2.b; and c), and Architectural Guidelines (VII-D.4) that address compatibility between old and new development. To further augment the existing design guidance, additional language relative to harmonizing change has been added to the draft UCSP. This includes a photo essay (VII-C) of existing development that can be used as a guide of important design cues to be considered by future development proposals. The design review would be subject to the public participation process, through the Redevelopment Advisory Committee, recently established by the Chula Vista Redevelopment Corporation.

I-9 This comment states that potential changes to the character of a portion of Third Avenue could be avoided by extending the V-2 designation to that area. The DEIR contains Mitigation Measure 5.2.5-1 (pages 5-76/77) to ensure that potential visual character impacts are avoided or reduced to below a level of significance.

I-10 This comment states that the UCSP allows changes in adjacent land uses which are not harmonious with and in a manner inconsistent with the General Plan.

As discussed above in the response to Comment I-8, the General Plan requires new development along Third Avenue to be architecturally compatible with surrounding development. The UCSP would implement this objective of the General Plan. Future individual development projects in the Subdistricts Area would be reviewed for consistency with the requirements of the UCSP. See responses to Comments I-8 and I-9.

I-11 This comment suggests that the DEIR improperly relies on a legally non-compliant Housing Element and thus fails to adequately address potential impacts to housing. The DEIR appropriately relies on the existing Housing Element, located in Chapter 7 of the General Plan Update, which is still in effect. The current Chula Vista Housing Element covers the five-year period from 1999 to 2004, and was approved by the State in 2000 and then again in 2002. Jurisdictions within the San Diego Association of Government's COG are currently working on Housing Element updates for the 2005 to 2010 planning cycle. Page 5-122 of the DEIR presents the updated goals and objectives recommended for inclusion in the Housing Element update as of May 2006. Housing programs contained in the existing housing element will continue to be implemented until an update is certified.

I-12 This comment states no effort was made in the DEIR to address whether the anticipated additional housing units may be affordable to existing residents. The affordability of future housing in the project area is dependent on future conditions and a variety of factors that are beyond the scope of the DEIR. The UCSP is intended to provide development regulations and design guidelines that will accommodate a substantial increase in the number of housing units presently

available in the project area. As discussed in section 5.6.1.3 of the DEIR, the General Plan encourages the development of housing for all income categories. Section 5.6.1.3.b of the DEIR discusses the fact that portions of the project area are within a redevelopment zone in which at least 15 percent of all new and substantially rehabilitated dwelling units must be available at affordable prices to low- and moderate-income households and any such units proposed for demolition must be replaced at an affordable cost for the same income level. Section 5.6.2 of the DEIR also indicates that future proposals for the development of housing units in the project area will be evaluated for consistency with state law and General Plan goals and objectives for affordable housing. Please see responses to Comments E-1 and E-6.

- I-13** This comment states the DEIR does not include an inventory of the current housing stock and cost of housing in the area. Section 5.6.1.2 (Housing) of the DEIR adequately describes the existing housing stock in the project area. Section 5.6.1.3.b of the DEIR discusses the fact that portions of the project area are within a redevelopment area in which at least 15 percent of all new and substantially rehabilitated dwelling units must be available at affordable prices to low- and moderate-income households and any such units proposed for demolition must be replaced at an affordable cost for the same income level. The DEIR does not otherwise discuss the cost of housing in the project area because it is an economic matter which is beyond the scope of the DEIR. See also response to Comment E-6.
- I-14** A primary objective of the UCSP is to encourage growth anticipated in the City to locate in the project area. To accommodate the anticipated growth, the UCSP provides development regulations and design guidelines which among other things, will foster the development of a wide range and variety of types of housing in the project area. To the extent allowed by law and consistent with the General Plan, one factor the City will consider with respect to future proposals for residential development in the UCSP area is the extent to which a proposed project promotes or achieves the General Plan objectives for affordable housing. The projected increase in the number of housing units in the project area is expected to occur over a 25-year buildout period. As a result, it is anticipated that the development will occur at a rate which does not result in the displacement of substantial numbers of people at any given time and that the duration of displacement will be temporary while replacement housing units are constructed in the UCSP area. Section 5.6 of the DEIR considered that there would be temporary displacement of population as a result of the implementation of the specific plan was not significant. This determination centered around whether displacement of the population would require construction of housing elsewhere, in accordance with the CEQA thresholds of significance. The EIR concluded that because 10,800 residential units would be permitted as a result of the proposed

project, 7,100 units more than currently exist, additional housing would not have to be constructed elsewhere. Since housing would not need to be constructed elsewhere, there would not be a physical change elsewhere resulting from that construction. See also responses to Comments E-1 and H-13.

- I-15** This comment states the DEIR claims the displacement of people and destruction of affordable housing is an indirect social or economic impact that can be ignored under CEQA. The DEIR does not make any such claim. Pursuant to CEQA Guidelines Appendix G, Sections 5.6.3.2 and 5.6.3.3 of the DEIR analyze whether the UCSP would result in the displacement of existing housing or people which would necessitate the construction of replacement housing elsewhere. Section 5.6.1.3 discusses the laws and General Plan policies which authorize the City to address affordable housing issues. Please also see responses to Comments E-3, E-6, and I-12 through I-14.
- I-16** This comment states that the DEIR must analyze potential impacts on existing housing stock and displacement of current residents and propose appropriate mitigation measures.

Pursuant to CEQA Guidelines Appendix G, Sections 5.6.3.2 and 5.6.3.3 of the DEIR analyze whether the UCSP would result in the displacement of existing housing or people which would necessitate the construction of replacement housing elsewhere. These sections determined that the projected increase in the number of housing units in the project area is expected to occur over a 25-year buildout period. In light of this development horizon, it is reasonable to infer that anticipated development will occur at a rate which does not result in the displacement of substantial numbers of people at any given time, that the duration of displacement will be temporary while replacement housing units are constructed in the UCSP area, and the construction of replacement housing elsewhere will not be required. Since the DEIR concluded the potential impacts of the UCSP would not be significant, no mitigation was proposed or is required. Please also see responses to Comments E-3, E-6, and I-12 through I-15.

Environmental Health Coalition

COALICION de SALUD AMBIENTAL

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July 13, 2006

Mr. Brian Sheehan
Senior Community Development Specialist
276 Fourth Avenue
Chula Vista, CA 91910

Re: Environmental Health Coalition comments on the Draft EIR (DEIR) for the Urban Core Specific Plan

Dear Mr. Sheehan:

Environmental Health Coalition (EHC) is a 26 year old environmental and social justice organization working in the San Diego/Tijuana region. We organize and advocate to protect public health and the environment. EHC has reviewed key sections of the DEIR in-depth and has major concerns regarding the analysis for several elements and believes that more rigorous mitigation is necessary under the California Environmental Quality Act (CEQA).

Specifically, we are most concerned that in the DEIR and, subsequently the UCSP: 1) there is no exclusion buffer for new residential construction next to freeways; 2) there are no requirements for green/sustainable building and energy conservation; 3) additional protections are needed to address housing impacts; and, 4) stronger language is needed for water quality and hazardous materials. We strongly urge the City to strengthen these areas to ensure that these impacts to human health and the environment are sufficiently mitigated.

Please find below our in-depth comments below. Specific recommendations follow each discussion.

AIR QUALITY

The major failing of the DEIR is its treatment of the effects of air toxics on sensitive receptors related to freeways. The analysis is based on several questionable assumptions, partial information, and a grossly inadequate health risk assessment. The EIR should be revised to include more full and accurate information and increased mitigation.

- A. DEIR inappropriately relies on non-enforceable, non-measurable, un-secured future actions to mitigate impacts of emission from traffic on human health.**
- J-1 1. While mobile source emissions are the jurisdiction of state authorities, there are preventative measures which can and should be taken at the local level to protect the environmental health

of the community from increased freeway traffic brought on by expansion in resident and "daytime" population in the UCSP. The DEIR notes repeatedly that the California Air Resources Board (CARB) has mandated a diesel emission reduction goal for 2020. However, any reductions achieved through this program must be balanced by expected increases in traffic, generally. In fact, CalTrans statistics show that diesel truck traffic at H St. increased each year from 2000 to 2004, from 168,500 diesel trucks in 2000 to 182,900 trucks in 2004. The intensity of construction activities, and increase in population, associated with the new land use plan in the UCSP would be compounded with this natural increase in truck traffic.

J-2 2. The mandate for diesel reductions at the state level is a goal. It cannot be assumed that this goal will be met. And, given that the diesel reduction goal is set for 2020, and much activity associated with the UCSP is likely to happen before that time period expires, it is inappropriate to cite it in the DEIR as passive mitigation for the effects of freeway-related emissions upon sensitive receptors.

J-3 3. We do not believe there is substantial enough statistical evidence to confirm the assumption that with an almost 200% increase in residential development, as well as a 33% increase in commercial retail and 54% increase in commercial office space, that total vehicle trips will decrease because of smart growth principles incorporated into the UCSP plan. It is unclear how much the new resident and daytime population can be expected to use public transit, even with these principles being implemented. There is no way to predict the preferences of those who will move into new units. Current ridership statistics in San Diego County show that less than 5% of the population currently uses public transit on a regular basis. While implementation of smart growth principles should increase ridership for the UCSP population, it cannot be relied on as a certainty that it would actually decrease vehicle trips. Estimates of air quality and impacts on sensitive receptors in close proximity to freeway should be re-visited. Mitigation measures should be more prescriptive, instead of incentive-based, and should be required instead of recommended for new development.

J-4 4. While PM10 and PM2.5 have been amongst the most studied emissions from high traffic roadways, and form the foundation of the CARB guidelines, they are not the only noxious emissions from freeways. Cars also release dangerous toxins, such as carbon monoxide and benzene. The SANDAG statistics cited in the DEIR itself (pg 5-279) show an increase in car traffic from 2,769,000 in 1995 to 4,517,000 in 2010, to 5,226,000 in 2030. These cars will no doubt go on the freeway, and will sit on the freeway in periods of high traffic. The emissions from additional car trips caused by the construction of high density in the UCSP needs to be accounted for. The DEIR's citation of the state mandate for diesel reduction is not sufficient—mitigation should not be based on long-term policy goals designed to curb part of the problem.

J-5 **EHC Recommended Revision:** A mitigating measure of establishing a required exclusion zone of 350 ft between the freeway and new residential and day care uses and an avoidance area between 350 and 500 feet should be adopted as a mitigation and as part of the UCSP.

B. DEIR relies on a severely flawed Health Risk Assessment related to diesel particulate emissions near the freeway.

- J-6 5. EHC believes there are serious deficiencies with the health risk assessment (HRA) conducted for the DEIR. The appendix for the DEIR did not include details of the modeling that was done to estimate the levels of diesel particulates at various distances from the freeway. In particular, the assumptions made about the vehicle population were not given, and we suspect that the diesel truck traffic on this stretch of the I-5 was underestimated. The I-5 going through Chula Vista has truck and bus traffic going south from the Port of San Diego at the 10th and 24th Street terminals, and coming north from both San Ysidro and Otay ports of entry from Mexico, as well as standard freeway truck traffic. Freeway traffic models that use default values for San Diego as a whole, or traffic counts from previous years, are likely to underestimate the diesel truck traffic, and diesel emissions, from the I-5 going through Chula Vista. We also question the use of the Caline4 model to model dispersion of particulate emissions. Caline was developed for the sole purpose of modeling dispersion of carbon monoxide, a gas which may be expected to disperse much differently than particulate matter. The Caline4 users manual does not contain instructions for modifying the model to use for emissions other than CO, and we conclude that it was not designed to be used as it was for this risk assessment. For these reasons we have little confidence in the exposure estimates that were used to derive the cancer risk estimates, and that the true cancer risks and noncancer risks (which were not stated in the DEIR) are higher than reported for freeway diesel emissions. And, as noted above, freeways produce additional pollutants, such as benzene, which were not included at all in this assessment.
- J-7
- J-8
- J-9

It is important to note that, even in spite of the faults in the HRA presented in the DEIR, the results were significant at all distances studied (500, 350, 150), and warrant strong mitigation.

- EHC Recommendation:** Given the strong science and the results of the HRA that demonstrate the high level of expected health impacts to new residents, the City should act in a precautionary manner to include the mitigation listed above to include a mitigating measure of establishing, at a minimum, a required exclusion zone of 350 ft between the freeway and sensitive receptors and an avoidance area between 350 and 500 feet be adopted as a mitigation and as part of the plan.
- J-10

C. DEIR and UCSP is internally inconsistent related to direction for where housing should be located.

- J-11 6. While EHC supports the use of public transit instead of automobiles, we feel that the smart growth principle of building residential density near transit needs to be further qualified. The trolley stop in the UCSP is directly adjacent to the freeway, and so the UCSP's frequent encouragement of high density development near transit can contradict, and even be interpreted to trump, the recommendation that developments should be sited "away from the freeway to the extent possible" (5-232). Given that the smart growth principle of siting high

density development as near transit as possible is foundational to the UCSP, as well as the DEIR, we strongly recommend that it be consistently qualified to read, "**development in areas around transit is encouraged, except for residential within 500 feet of the freeway.**" It is also stated on Pg 5-236 that the executive director will be the judge of whether an individual development complies with land use regulation and design guidelines, i.e. is it too near the freeway; is it near enough to transit. This should not be left to an individual's discretion. There should be concrete thresholds established for each of these criteria. While we greatly appreciate the inclusion of some language regarding the freeway and residential, we believe that a strong mitigation is required here to protect future residents in the area.

J-12

7. Further, the UCSP must implement the General Plan. The General Plan Policy E 23.4 states, in part, "*Build new...residential dwellings with sufficient separation and buffering from ...uses that pose a significant hazard to human health and safety.*" Given the significant flaws in the include HRA and the litany of health studies showing health impacts within 500 feet of a high traffic freeway, we request again that the City include a zone of absolute exclusion for new residences within a clearly specified and protective distance from the freeway.

J-13

Recommended Mitigation: Adopt the proposed mitigation listed above under

A.4.

- J-14 D. **DEIR should include an additional "reduced alternative" to address health hazards of locating additional residences near freeways.**

8. Under the Alternatives section of the DEIR, it is stated that, "cumulatively significant impacts associated with sensitive receptors adjacent to I-5 would also remain under the (Reduced Alternative option)." EHC believes the final EIR should include a second "Reduced Alternative" which simply prohibits residential development within 500 feet of the freeway. The current "Reduced Alternative" decreases density in several areas throughout the UCSP, leaving the health impacts associated with proximity to freeways intact. A reduced alternative that eliminates residential development within 500 ft of freeway would both decrease density, and curb the health impacts associated with proximity to freeway.

EHC recommended revision: FEIR should include a second "Reduced Alternative" which simply prohibits residential development within 500 feet of the freeway or implements mitigation listed above under A.4.

ENERGY

- J-15 The DEIR should be revised to better reflect energy impacts, and include mitigation which implements Chula Vista's existing commitment to leadership in setting progressive energy policy and to the stated goals in the General Plan and existing policies of the City.

- J-16 1. The UCSP EIR should build upon the City of Chula Vista's leadership role in establishing aggressive but achievable goals for renewable energy (RE) and energy efficiency (EE). EHC is concerned that the DEIR fails to set enforceable provisions that will provide real mitigation of what is deemed to be a significant impact of electricity demand growth associated with the UCSP. The DEIR points to the Chula Vista energy strategy and the City's CO2 reduction plan as mitigation measures for this growth in energy demand. While these City energy initiatives are commendable, it is inappropriate that these be considered mitigation measures for the UCSP for the following reasons:
- a) While we support the City's efforts to implement many of the goals in the Energy Strategy Action Plan, this plan does not provide enforceable requirements, especially for development in the private sector, and cannot be relied upon for mitigation.
 - b) While the City's CO2 reduction plan should be applauded and certainly continue to be pursued, it is focused on City-owned buildings and operations in its plan to curb "fixed demand" energy growth. City facilities and operations only account for about 2% of the City of Chula Vista's energy demand, so it is critical to develop energy sustainability requirements for the private sector in Chula Vista, as well.
 - c) None of the aforementioned initiatives set RE and EE provisions that are focused on land use planning, so relying on these initiatives ignores the important role that land use planning measures must play in providing energy security and sustainability.
- J-18 2. It is not clear why the green energy building design elements in the UCSP are not included as mitigation measures in the DEIR. These should be considered mitigation measures and should be required, not just encouraged. While some builders may choose to build green due to a commitment to social responsibility, for marketing purposes, or to add value to the property, it is unrealistic to assume that most builders will pursue what are at times more expensive green building options unless they are required to do so. While density bonuses associated with green building practices may provide some incentive for builders to "go green", EHC is concerned that the density bonuses alone will not provide sufficient incentive to offset increased energy demand, and may actually increase energy demand in the area given that higher density means more energy consumers in a given area.
- J-19 **Recommended Mitigation:** The UCSP EIR should require aggressive but achievable green building standards as mitigation for energy demand growth. All new development should exceed energy efficiency standards that are consistent with, at a minimum, the City's EE standards for themselves or other more aggressive sustainable energy building standards. These standards should require that developments take advantage of passive sources of heat, cooling, ventilation, and light, and also use Energy Star appliances.
- J-20 **Recommended Mitigation:** If a given development will increase the "energy footprint" or use within an area of land, the developer should pay a mitigation fee that will be used to provide energy savings in existing developments equivalent to the increased electricity demand.
- J-21 **Recommended Mitigation:** The UCSP EIR should include a mitigation measure that would require any buildings that are sold or that undergo major remodeling to conform

to green energy building standards. Existing buildings are not covered by Title 24 standards under state law, but provide an excellent opportunity to achieve considerable energy savings when retrofitted.

- Recommended Mitigation:** The UCSP EIR should include an energy mitigation measure that requires that all commercial and residential development be built "solar ready" with the appropriate roof availability and orientation, wiring, and other measures to allow less expensive installation of solar PV should owners want to do so after purchase of the property.
- J-22

- Recommended Mitigation:** The EIR should include a stipulation that if density bonuses for developments that exceed the Plan's established energy standard are awarded, the City will ensure that the energy efficiency savings committed to are not negated by the increased density. That is, the total energy savings should be the same as it would be if the development were to adhere to the density standards set in the UCSP. This is consistent with the CV GPU which states that, "The amount of bonus awards Chula Vista will make available should take into account the projected build-out that would occur if all of the bonus provisions allowable under the program were actually awarded. This total should not exceed the capacity of the land or the capacity of the City to provide infrastructure and services to support the build-out."
- J-23

- Recommended Mitigation:** City should include a commitment to use development in the Urban Core for a sustainable energy efficiency "proof of concept" project to demonstrate how energy requirements for new development can be met in a more sustainable manner.
- J-24

3. The DEIR notes that all public buildings will be held to stringent green building standards through existing City policies. However, since the bulk of the projects that will be pursued under the UCSP will be privately developed and owned, the same requirements should be required of these developments. The EIR should require that 20% - 40% of energy needs for all residential and commercial developments be provided through on-site renewable energy. Such a measure will be critical to the City achieving its stated Policy E 7.5 in the City of Chula Vista General Plan that directs the City to "Pursue 40% City-wide electricity supply from clean renewable sources by 2017."
- J-25

Recommended Mitigation: The requirement the City has placed on City-owned development per City of Chula Vista Policy 840-03 should be a mitigation measure in the UCSP EIR for public AND private development in the urban core area.

HOUSING

- The DEIR fails to adequately address the impacts to housing and displacement of residents. While it is clear that the UCSP is designed to facilitate a substantial net increase in housing units, there is insufficient mitigation for displaced low-income persons. We understand that the Housing Element is an important plan for how this issue is to be handled, but the UCSP should include policies that will ensure that the area does not suffer a loss of affordable housing
- J-26

and incur the impacts associated with such displacement. Following are several comments which EHC believes justifies further mitigation:

1. In the summary, the DEIR notes that, "*the UCSP will not displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere... The majority of new development in the Subdistricts area is expected to replace these low-intensity non-residential uses with higher intensity, mixed-use development that will substantially increase the number of housing units. Housing that may be removed by individual projects completed in compliance with the UCSP does not necessitate the construction of housing elsewhere because the overall number of housing units would be accommodated with the UCSP.*"

J-27 While this point holds true for market-rate housing, it does not speak adequately to the displacement of affordable housing units, whether bound by covenant or not. Higher density development may provide more housing units, but if they are not affordable to displaced residents, then new housing will need to be built elsewhere to accommodate them.

2. On pg. 5-33, the DEIR states that, "*through California Redevelopment Law requirements, tax increment financing would be collected over much of the UCSP Subdistricts Area, with a minimum of 20% Set Aside for low and mod income housing options. The increased density allowed in the proposed UCSP would provide increased opportunities for the development of low and moderate income housing...*"

J-28 While this scenario holds true for development within the current redevelopment project areas, there is no provision for replacement of affordable housing (both with and without covenant) which is eliminated to make way for high-density market rate housing **outside** of the current project areas. In this scenario, redevelopment's "one-for-one law," 15% inclusionary law, and requirement of redevelopment law that displaced units be replaced within a four year period, do not apply. This is of key importance due to the fact that of the 3700 units (730 parcels) within the Urban Core Specific Plan area, only 599 units (266 parcels) are in the redevelopment area so impacts to housing outside of the RDA is of greater potential.

On pg. 5-126, the DEIR states that, "While people may be temporarily displaced during the development of individual project sites, the continuous production of housing elsewhere within the urban core and throughout Chula Vista would ensure replacement of housing and provide a continuous source of housing options."

J-29 However, the "continuous production of housing elsewhere within the urban core and throughout Chula Vista," is assumed and not required, and there is no stipulation that new housing be affordable to displaced residents. While 20% set aside funds must be spent on affordable housing, there is not sufficient time certainty on the expenditure of these funds.

EHC Recommended Mitigation: The City should extend the housing protections (one-for-one law and 15% inclusionary) and timelines for action (four years) required in the redevelopment area to the entirety of the UCSP sub-districts.

J-30

LAND USE AND PLANNING

J-31 DEIR should be amended to include additional restricts to protect human health from hazardous materials emissions—particularly toxic dry cleaner emissions.

1. On pg. 5-45, the DEIR states that, "Some commercial uses may use hazardous materials or generate hazardous waste, such as photography studios, restaurants, medical laboratories, dry cleaners, auto repair shops, print shops, and electronics repair or retail. Were these types of uses to develop within the Subdistricts Area, there would be the potential for hazardous materials impacts. However these types of non-industrial activities are generally considered to be low-level generators and require special business license permitting and registration of any above ground or underground storage tanks with the DEH."

EHC believes that the EIR and the UCSP need to specify that dry cleaners using perchloroethylene, or "perc", are not permitted anywhere in the UCSP. As the CARB handbook notes, this is the solvent most commonly used in the dry cleaning industry to clean clothes. Health studies show that exposure to perc can result in cancer and non-cancer health impacts. It is particularly dangerous to infants living in the same complex as a dry cleaner using perc.

J-32 **Recommended Mitigation:** Mixed use buildings in the UCSP should explicitly prohibit dry cleaners using perc. Additionally, EHC believes that dry cleaners using perc should be excluded from the UCSP entirely.

WATER QUALITY

J-33 Benefits to water quality from sustainable building elements cannot be claimed unless required in the UCSP.

1. The DEIR discusses the potential benefits to water quality from LEED or other sustainable building standards at length. However, as with our energy discussion above, the benefits cannot be certain to be realized here unless such standards are required.

J-34 **Recommended Mitigation:** Require sustainable building elements as part of the conditions of the UCSP.

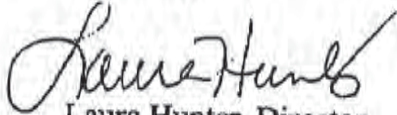
2. The DEIR analyzes compliance of all projects with the current MS4 permit. However, many aspects of the permit do not apply to smaller projects below the permit threshold. Further, there will soon be a new MS4 permit adopted.

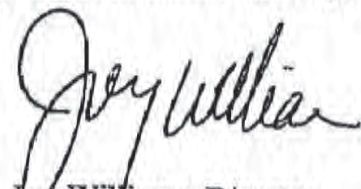
J-35 **Recommended Mitigation:** The FEIR should assure that stormwater BMPs are planned into development projects of all sizes and intensities.

J-36 Last, EHC supports the comments on water quality made in the Sierra Club comments letter.

Thank you for the opportunity to comment on this important issue.

Sincerely,


Laura Hunter, Director
Clean Bay Campaign


Joy Williams, Director
Community Assistance and Research


Tony LoPresti
EHC Policy Advocate

Response to Letter J Environmental Health Coalition

J-1 The results of the cancer risk are provided in Table 5.10-13 of the DEIR. The calculated risk ranges from a high of 230 in 1,000,000 at some receptors 150 feet from the source to a low of 71 in 1,000,000 at 500 feet from the road. It should be noted that incremental cancer risk is calculated assuming a 24 hour per day 70-year lifetime exposure. The assessment also does not account for significant mobile source emission reductions mandated to occur by state and federal regulations over the next 5 to 15 years.

As presented in the health risk assessment on page 5-234 of the DEIR, the CARB Risk Reduction Plan to Reduce Particulate Matter Emission from Diesel-Fueled Engines and Vehicles was appropriately cited as containing goals to reduce diesel particulate emissions. As reflected in the DEIR air quality mitigation measures 5.10.5-1 through 5.10.5-4 (pages 5-236 – 5-238), the CARB diesel reduction program was not included as a mitigation measure. Cumulative air quality impacts resulting from diesel particulate emissions emanating from Interstate 5 was concluded to be significant and unmitigable (page 5-239).

Further, as stated in the DEIR, in April 2005, the California Air Resources Board (CARB) published the "Air Quality and Land Use Handbook: A Community Health Perspective." The handbook makes recommendations directed at protecting sensitive land uses while balancing a myriad of other land use issues (e.g., housing, transportation needs, economics). It notes that the handbook is not regulatory or binding on local agencies and recognizes that application takes a qualitative approach. As reflected in the CARB handbook, there is currently no adopted standard for the significance of health effects from mobile sources. Although there is no adopted standard for mobile sources, such as the freeway, the effects detailed in Table 5.10-13 are considered to be cumulatively significant. The only means of reducing these effects is the implementation of source controls. The CARB has worked on developing strategies and regulations aimed at reducing the risk from diesel particulate matter. The overall strategy for achieving these reductions is found in the "Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles" (State of California 2000). A stated goal of the plan is to reduce the cancer risk statewide arising from exposure to diesel particulate matter 75 percent by 2010 and 85 percent by 2020. A number of programs and strategies to reduce diesel particulate matter that have been or are in the process of being developed include the Diesel Risk Reduction Program which aims to reduce diesel particulate emission over the next 5 to 15 years through improved automobile design and alternative fuel efficiency (State of California 2005a, www.arb.ca.gov/diesel/dieselrrp.htm). These programs are outside of the

jurisdiction of the City of Chula Vista. However, in recognition of the guidance provided in the CARB handbook, the UCSP Development Design Guidelines (Chapter VII, Section G.5) have incorporated site design measures to be considered by future redevelopment adjacent to I-5, where possible, to help minimize effects. These measures include siting residential uses away from the freeway, tiering residential structures back from the freeway, and incorporating mechanical and structural measures into the building design. While these measures may serve to reduce the severity of diesel particulate emissions impacts, implementation of diesel vehicles source control measures by State authorities would be required to reduce cumulative impacts to below significance.

As stated in Mitigation Measure 5.10.5-2 "Prior to issuance of an Urban Core Development Permit or other discretionary permit, all subsequent individual development projects shall demonstrate to the satisfaction of the Community Development Director, conformance with the relevant land use and development regulations (UCSP, Chapter VI) and development design guidelines (UCSP, Chapter VII)." Section 6 of Chapter VII of the UCSP includes site design measures that would be considered by future redevelopment adjacent to I-5, to help minimize effects. These recommended design measures include avoiding siting sensitive uses, siting "non-sensitive" uses nearest to the freeway, tiering back residential development, or incorporation of structural and mechanical measures into new development. A mandatory application of the suggested design measures (i.e. avoidance of development within 350-500 feet) cannot be made without consideration of the implications on future development of the affected sites adjacent to the freeway. See also responses to Comments J-5 and J-6.

- J-2** This comment states that the DEIR should not cite CARB's diesel emission reduction goal as a passive mitigation measure because it is a long-term goal that cannot be assumed to be met.

As described in Sections 5.10.3 through 5.10-5 of the DEIR and summarized above in response to Comment J-1, mitigation measures requiring future development projects to conform with UCSP regulations and guidelines, and in particular the siting guidelines next to Interstate 5, would help to reduce cumulatively significant particulate emissions impacts, but not to below a level of significance. It is unclear what the comment means by "passive mitigation," however, CARB's diesel emission reduction goals were identified in the impact analysis as a means, outside of the jurisdiction of the City of Chula Vista, to implement particulate emissions source controls. Vehicle emissions source control was identified as the only effective strategy to reduce cumulative particulate emissions. *CARB's Risk Reduction Plan to Reduce Particulate Matter*

Emissions from Diesel-Fueled Engines and Vehicles was not identified as a mitigation measure.

- J-3** This comment states that there is not substantial enough statistical evidence to confirm the assumption that total vehicle trips will decrease because of smart growth principles incorporated in the UCSP plan and that the DEIR should revisit estimates of freeway-related air quality impacts.

The statistical analysis and model used to analyze freeway-related air quality impacts are described in section 5.10.3.4.b of the DEIR and the health risk assessment contained in Chapter 6.0 of the Air Quality Report, which is included as Appendix E to the DEIR. The results of future toxic air contaminants emissions modeling for the proposed project yielded a reduction in overall emissions at buildout in year 2030 compared to existing conditions. This reduction in emissions is attributable not to fewer vehicle trips, as the comment incorrectly observes, but to increased efficiency of the future vehicle fleet. The evidence for concluding that the proposed UCSP would yield potentially less air quality impacts than existing conditions thus derives from the URBEMIS model assumptions for the year 2030 that anticipate greater future vehicle fleet efficiency compared to now. Despite a greater number of vehicles on area roadways due to a larger population in the UCSP area, future vehicle fleet conditions would realize improved air quality features. Model parameters for future conditions reflected widely accepted, standardized application of future vehicle profiles. As an example, despite substantial increases in vehicle trips since the 1970s, air quality has dramatically improved, largely due to improved vehicle emissions controls and fuel efficiency. See also response to Comment H-38.

- J-4** This comment states that cars on freeways also emit carbon monoxide and benzene and emissions from additional car trips caused by construction of high-density in the UCSP needs to be accounted for. The City recognizes that there are at least 16 noxious organic gases that emit from tailpipes of vehicles. However, the studied risks associated with diesel particulates is sufficiently greater than the health risks associated with organic reactive gases. Particulate matter comprises a six-fold health risk compared to that of benzene, for example. Chapter 5.10 in the DEIR accounted for the air quality effects of additional vehicle trips on area roadways resulting from implementation of the Urban Core Specific Plan, including freeways. Using the URBEMIS2002 computer program, anticipated air emissions for five toxic air contaminants (CO, NO_x, ROG, SO_x, and PM₁₀) resulting from buildout of the proposed Plan was modeled for summer and winter conditions. A discussion of operational air emissions impacts is contained in the DEIR in Section 5.10.3.3 (b) and the results are presented in Table 5.10-7 (page 5-222). Given that particulate emissions serve as an

excellent indicator of health risk, focusing the Health Risk Assessment of freeway vehicle emissions on particulates allowed the City to effectively evaluate freeway vehicle emissions impacts. Given regional noncompliance with particulate standards, it was concluded that health risks resulting from freeway vehicle emissions was significant. See also response to Comments J-2 and J-3.

J-5 This comment requests the addition of another mitigation measure that would prohibit new residential and day care uses within 350 feet of the freeway and an avoidance area between 350 feet and 500 feet from the freeway. The DEIR contains Mitigation Measure 5.10.5-2 (page 5-236/237) to address adverse effects resulting from freeway particulate emissions, noting that implementation of diesel vehicles source control measures would be required by State authorities to reduce cumulative impacts to below significance. As stated in Mitigation Measure 5.10.5-2 "Prior to issuance of an Urban Core Development Permit or other discretionary permit, all subsequent individual development projects shall demonstrate to the satisfaction of the Community Development Director, conformance with the relevant land use and development regulations (UCSP, Chapter VI) and development design guidelines (UCSP, Chapter VII)." Therefore, site design measures would be considered prior to the approval of future redevelopment adjacent to I-5, where possible, to help minimize effects. A mandatory application of the recommended design measures cannot be made without consideration of the implications on future development of the affected sites adjacent to the freeway. See also response to Comment J-1.

J-6 This comment states that the health risk assessment (HRA) conducted for the DEIR as contained in the technical appendix E did not include details of the modeling that was done to estimate the levels of diesel particulates at various distances from the freeway, and in particular assumptions about the vehicle population. The traffic volumes used in the HRA are included in the printouts of the Caline4 model in Attachment 4 to Appendix E of the EIR, Air Quality Technical Report. A future Interstate 5 traffic volume of 8,566 vehicles per hour was obtained from SANDAG for the year 2030 for the segment of Interstate 5 adjacent to the project. The diesel mix of the vehicle population was addressed through the Emfac2002 modeling process and then applied to the vehicles per hour value used in the Caline4 model. An assumption of 5 percent of traffic on the freeway being diesel-emitting was used in the HRA analysis and was based on recent actual counts of diesel-emitting vehicles conducted by Caltrans for Interstate 5 adjacent to the project. An explanation of the procedure involved has been added to the EIR text and Appendix E.

Section 5.10.3.4 b. Health Risk Assessment of the DEIR on page 5-227 has been revised as follows:

"Consistent with General Plan Update Policy EE 6.10, a health risk assessment was performed to consider the potential effects of placement of sensitive uses (e.g., residential uses) within 500 feet of Interstate 5. The HRA is included as Chapter 6.0 of the Air Quality Report (see Appendix E). The HRA included the calculation of potential cancer risk and a chronic health hazard index resulting from exposure to diesel particulates. The calculation involved an iterative generation of an emissions factor rate for diesel particulates using the Emfac2002 program. The calculation of individual emission factors for every type of vehicle assumed the default parameters for the San Diego Air Basin provided by the model. Using the individual emissions factors, a composite emissions rate was then generated, which assumed 5 percent of traffic as diesel-emitting. An assumption of 5 percent of traffic on the freeway being diesel-emitting was based on recent counts of diesel-emitting vehicles conducted by Caltrans for the segment of Interstate 5 adjacent to the project. Emission factors were calculated for both summer and winter conditions.

These emission factors were then applied to the vehicles using the freeway, and dispersed using the Caline4 dispersion model. A future Interstate 5 traffic volume of 8,566 vehicles per hour was obtained from SANDAG's 2030 projections. This model results in concentrations at locations along the roadway. The Caline4 model is a line source model that does not specifically address topographic variability or intervening structures. It should be noted that the Interstate 5 freeway is up to 30 feet lower in elevation than those adjacent areas currently developed with uses and proposed for new mixed-use residential and high-density residential uses. The proposed scale of the new development may also include structures that are mid to high rise (at trolley stations) unlike the low scale one-two story structures that exist today. Based on these concentrations, a cancer risk measured in terms of number of cancers per million was determined."

Chapter 6.0 Health Risk Assessment on page 39 of the Air Quality Technical Report (Appendix E of the DEIR) has been revised as follows:

"A health risk assessment was performed to consider the potential effects of placement of residential uses within 500 feet of Interstate 5. This analysis included the calculation of potential cancer risk and a chronic health hazard index resulting from exposure to diesel particulates. The calculation involved an iterative generation of a composite emissions factor rate for diesel particulates using the Emfac2002 program. The calculation of individual emission factors for every type of vehicle assumed the default parameters for the San Diego Air Basin provided by the model. Using the individual emissions factors, a composite emissions rate was then generated, which assumed 5 percent of traffic as diesel-emitting. An assumption of 5 percent of traffic on the freeway being diesel-emitting was based on recent counts of diesel-emitting vehicles

conducted by Caltrans for the segment of Interstate 5 adjacent to the project. Emission factors were calculated for both summer and winter conditions (Attachment 4).

These emission factors were then applied to the vehicles using the freeway, and dispersed using the Caline4 dispersion model. A future Interstate 5 traffic volume of 8,566 vehicles per hour was obtained from SANDAG 2030 projections. This model results in concentrations at locations along the roadway. It is a line source model that does not specifically address topographic variability or intervening structures. Based on these concentrations, a cancer risk measured in terms of number of cancers per million was determined (Attachment 5). . . .”

- J-7** This comment inquires whether the freeway traffic model used traffic counts from I-5 near the project or default values for San Diego as a whole, which may underestimate diesel truck traffic and diesel emissions.

The health risk assessment utilized SANDAG regional 2030 traffic projections for Interstate 5 adjacent to the project. Vehicle mix, including percentage of trucks, was obtained from Caltrans' actual counts for area traffic and applied to future traffic volumes. The default value of truck traffic percentages throughout the study area are included the model projections as calculated by SANDAG. The City has never manually adjusted truck percentages, up or down, in any SANDAG traffic model. The text of the DEIR has been revised to clarify this information as expressed in response to Comment J-6 above.

- J-8** This comment states that the Caline4 model was not designed to model the dispersion of particulate emissions. As stated in its users manual (page 1), Caline4 is an accepted modeling program to model the dispersion of four pollutants, including particulates, and was not developed solely to model carbon monoxide dispersion. The Caline4 users manual does not contain instructions for modifying the model for particulate use, as no modifications are necessary. To model particulate dispersion, one simply selects the particulate option (the fourth of four options) in the model input variables prompt. The Caline4 model serves as an ideal model to model particulate dispersion from freeway vehicles as it is one a few models that are able to calculate line-source (as opposed to stationary source) emissions. Further information about the applicability of the Caline4 model to particulate dispersion modeling can be found at <http://www.dot.ca.gov/hq/env/air/pages/calinemn.htm>.

- J-9** This comment questions the modeling assumptions used in the Health Risk Assessment and the lack of inclusion of additional pollutants such as benzene. Appropriate freeway vehicle assumptions were incorporated into the calculation of cancer and chronic health risks, resulting in an accurate health risk assessment. See responses to Comments J-4, J-6, J-7, and J-8.

- J-10** This comment again requests the adoption of an additional mitigation measure that prohibits new residential or day care uses within 350 feet from the freeway and the adoption of an avoidance area between 350 feet and 500 feet. See response to Comments J-1 and J-5.
- J-11** This comment expresses concern that the smart growth principle of locating residential uses near transit centers may conflict with the recommendation that residential developments should be sited away from the freeway to the extent possible. As presented in Section 5.1.3.2.a and b of the DEIR (pages 5-31/32), the primary goals of the Urban Core Specific Plan are consistent with the smart growth strategies contained in the Regional Comprehensive Plan and Regional Transportation Plan. Among these strategies is the strategy of concentrating a mix of retail, office and high-density residential uses around transit centers and along major transportation corridors (page 5-32). Accordingly, the Plan proposes three Transit Focus Areas (TFAs) at different locations within the Subdistricts Area. Two TFAs are to be centered on the existing E and H Street trolley stations just east of Interstate 5, and a third is to be centered on the H Street and Third Avenue intersection. The Plan also contains special site design provisions within the Development Design Guidelines for residential uses near Interstate 5. These provisions were developed and incorporated into the Plan in recognition of guidance provided in the CARB handbook and are intended to lessen the severity of freeway-related impacts on future residential development. The CARB Handbook makes recommendations directed at protecting sensitive land uses while balancing a myriad of other land use issues (e.g., housing, transportation needs, economics). It notes that the handbook is not regulatory or binding on local agencies and recognizes that application takes a qualitative approach. As reflected in the CARB handbook, there is currently no adopted standard for the significance of health effects from mobile sources. The Plan principle of concentrating mixed-use, high-density residential development around transit nodes is augmented by, not contradicted by, the freeway adjacency site design guidelines.
- J-12** This comment recommends revision to both the UCSP and DEIR to exclude residential development within 500 feet of the freeway, and to incorporate this language into a mitigation measure that specifies concrete thresholds. The DEIR contains Mitigation Measure 5.10-5.2 (page 5-236/237) to address adverse effects resulting from freeway particulate emissions, noting that implementation of diesel vehicles source control measures would be required by State authorities to reduce cumulative impacts to below significance. As such, the EIR appropriately concludes that the impact is significant and unmitigated. See also responses to Comments J-1 and J-5.

- J-13** This comment states that a mitigation measure absolutely excluding new residences within a clearly specified and protective distance from the freeway is warranted by General Plan Policy E-23.4 which provides new residential development should be sufficiently separated from uses that pose a significant hazard to human health and safety. See responses to Comments J-1 and J-5.
- J-14** This comment recommends the consideration of a fourth alternative which would prohibit residential development within 500 feet of the freeway. See responses to Comments J-1 and J-5.
- J-15** This comment is an introductory statement which states the DEIR should be revised to better reflect energy impacts and to include mitigation which implements the stated goals and policies of the General Plan. Energy impacts are addressed in section 5.12.4.3 of the DEIR. No further response to this general introductory statement is required. Responses to specific comments concerning the analysis of potential energy impacts follow.
- J-16** It is reasonable in the DEIR to consider ongoing implementation of the City's Energy Strategy and Action Plan, and its CO2 Reduction Plan, as partial mitigation. However, as stated in Mitigation Measure 5.8-1 (page 5-281), adherence to these programs is not sufficient to mitigate energy impacts to below significance because there is no assurance that energy resources will be available to adequately serve the Project.
- J-17** This comment recommends the City adopt a progressive sustainable energy policy and does not address the adequacy of the DEIR.
- See response to Comment E-11. Comment is noted and will be forwarded to the City decision makers for their consideration.
- J-18** See response to Comment E-11.
- J-19** See response to Comment E-11. This comment recommends the addition of an energy mitigation measure that would require all new development within the Plan Subdistricts Area to exceed energy efficiency standards that are consistent with, at a minimum, the City's EE standards, or other more aggressive sustainable building standards. The environmental sustainability measures of the UCSP may serve to reduce energy consumption associated with construction and occupation of structures within the UCSP area. However, because there is no assurance that energy resources will be available to adequately serve the projected increase in population resulting from adoption of the UCSP, the impact remains significant. The provision of energy is within the jurisdiction and responsibility of another public agency and not the City of Chula Vista.

J-20 See response to Comment E-11. This comment recommends the addition of an energy mitigation measure that would require payment of mitigation fees for all new development that increases the energy footprint or use within a given parcel. The environmental sustainability measures of the UCSP may serve to reduce energy consumption associated with construction and occupation of structures within the UCSP area. However, because there is no assurance that energy resources will be available to adequately serve the projected increase in population resulting from adoption of the UCSP, the impact remains significant. The provision of energy is within the jurisdiction and responsibility of another public agency and not the City of Chula Vista.

J-21 See response to Comment E-11. This comment recommends the addition of an energy mitigation measure that would require any new buildings that are sold or that undergo remodeling within the Plan Subdistricts Area to conform with green energy building standards. The environmental sustainability measures of the UCSP may serve to reduce energy consumption associated with construction and occupation of structures within the UCSP area. However, because there is no assurance that energy resources will be available to adequately serve the projected increase in population resulting from adoption of the UCSP, the impact remains significant. The provision of energy is within the jurisdiction and responsibility of another public agency and not the City of Chula Vista.

J-22 This comment recommends the addition of an energy mitigation measure that would require all commercial and residential development to be built "solar ready" to allow less expensive installation of solar panels should owners want to do so after purchase.

See response to Comment E-11. This mitigation measure is considered to be infeasible due to cost and impracticality. Readyng rooftops for future solar installation would add construction costs which would likely be passed on to the future purchaser, thereby negating any cost incentives. Also, given the wide variety of available solar design and the rapidly changing nature of solar technology, it would be unwise to proceed with wiring or other measures. In addition, the Plan allows for mixed-use and multi-family occupancies of future structures which would, in many cases, render distribution from a common rooftop solar array difficult.

J-23 This comment recommends the addition of an energy mitigation measure that would require that the City ensure that the energy savings gleaned from green building are not negated by the awarded density or FAR bonuses. Density bonuses are typically awarded for development to ensure that the energy efficient savings committed to are not negated by the increased density. Improved energy performance is one of many high-performance building criteria and measurement tools. It is possible for a building to achieve a minimum energy

performance improvement rating using standard measuring tools (e.g., LEED-NC), but also substantial locational, water, materials and indoor environmental air quality improvements. The green building incentive program has been crafted to allow greater design and whole building performance flexibility that supports improvements across a broad spectrum of performance indicators, not just energy. See response to Comment E-11.

- J-24** This comment recommends the City use development in the UCSP area for a sustainable energy efficiency "proof of concept" project. This comment raises a public policy issue which will be communicated to the City Council for its consideration. Because this comment does not raise an environmental issue concerning the adequacy of the DEIR, nor further response is required.
- J-25** This comment does not address the adequacy of the DEIR but instead recommends the addition of an energy mitigation measure that would require 20 to 40 percent of energy needs for all privately owned developments be provided through on-site renewable energy. This mitigation measure is considered to be infeasible as on-site generation of 20 to 40 percent of energy needs is highly speculative. See response to Comment E-11.
- J-26** This comment states the DEIR contains insufficient mitigation for displaced low-income persons and the UCSP should include policies that ensure the area does not suffer a loss of affordable housing. The comment is a general introductory statement that is followed by specific comments and recommendations. Responses to the specific comments and recommendations follow. Please also see responses to Comments I-12 through I-16.
- J-27** This comment expresses concern that new development under the UCSP may provide an increased number of residential units but these units may not be affordable to displaced residents.

The affordability of new housing that may be developed in the project area in the future is dependent on future conditions and a variety of factors that are beyond the scope of the DEIR. The UCSP provides development regulations and design guidelines that re intended to accommodate a substantial increase in the number of housing units presently available in the project area and to foster the development of a wide range and variety of types of housing in the project area. As discussed in section 5.6.1.3 of the DEIR, the General Plan encourages the development of housing for all income categories. Section 5.6.1.3.b of the DEIR discusses the fact that portions of the project area are within a redevelopment zone in which at least 15 percent of all new and substantially rehabilitated dwelling units must be available at affordable prices to low- and moderate-income households and any such units proposed for demolition must be replaced at an affordable cost for the same income level. Section 5.6.2 of the DEIR also

indicates that future proposals for the development of housing units in the project area will be evaluated for consistency with state law and General Plan goals and objectives for affordable housing. To the extent allowed by law and consistent with the General Plan, one factor the City will consider with respect to future proposals for residential development in the UCSP area is whether a proposed project promotes or achieves the General Plan objectives for affordable housing. The projected increase in the number of housing units in the project area is expected to occur over a twenty-five year build-out period. In light of this development horizon, it is reasonable to infer that anticipated development will occur at a rate which does not result in the displacement of substantial numbers of people at any given time, that the duration of displacement will be temporary while replacement housing units are constructed in the UCSP area, and the construction of replacement housing elsewhere will not be required. Since the DEIR concluded the potential impacts of the UCSP would not be significant, no mitigation is required.

- J-28** This comment states a majority of the housing units in the project area are not within a redevelopment area and thus are not subject to redevelopment law's requirements for preservation or replacement of affordable housing units. Specific plans are not required by state law to include provisions for replacement of affordable housing outside of redevelopment plan areas. However, the majority of the 690-gross-acre UCSP Subdistricts Area lies within a designated redevelopment project area. As described in Section 5.1.1.2.c of the DEIR and mapped in Figure 5.1.4, the existing Town Centre I and Merged Plan redevelopment plans cover approximately 70 percent of the UCSP Subdistricts Area where future development is expected to occur. Pursuant to State Redevelopment Law, 20 percent of funds generated through tax increment financing are required to be set aside for low and moderate income housing. For designated redevelopment plan areas, California redevelopment law requires that at least 15 percent of all new and substantially rehabilitated dwellings within designated redevelopment plan areas be available at affordable housing costs to, and occupied by, persons and families of low to moderate income. In addition, whenever low and moderate-income peoples' housing units are destroyed within designated redevelopment project areas, replacement units must be made available at an affordable cost for the same income level as that household that was displaced. This information is contained in the text of the DEIR in Section 5.1.6.3.b, page 5-123/124. See also response to Comment J-27.
- J-29** See responses to Comments J-27 and J-28.
- J-30** This comment recommends the addition of a mitigation measure that would extend the housing protection and timelines for action required in redevelopment plan areas to the entirety of the UCSP Subdistricts Area. The DEIR concluded

the potential impacts of the UCSP would not be significant; therefore, no mitigation is required. This comment does not address a CEQA issue but rather recommends a citywide housing policy change and is therefore better aligned with the housing policies contained in the Housing Element. The comment is hereby noted and will be forwarded to City decision makers for their consideration.

J-31 This comment requests that the DEIR be amended to include additional restrictions on hazardous materials and to specify that dry cleaners using perchlorethylene not be permitted within the UCSP area. Inclusion of a provision in the Plan or mitigation in the DEIR that specifically prohibits dry cleaners would not be necessary to accomplish the goal of protecting the health and safety of Urban Core residents. Dry cleaners are currently regulated by the San Diego Air Pollution Control District (APCD) through mandatory permitting, inspection and maintenance protocols. A supplemental application specific to dry cleaning facilities is required prior to issuance of a business permit. The application requires disclosure of all equipment, solvents, emission controls and vapor leak monitoring equipment, as well as a description of the cleaning process and operating schedule. The application also includes a Rule 1200 Toxics Evaluation that requires all facilities that process, produce, or otherwise use Rule 1200 listed materials (i.e., regulated toxic air contaminants) to prepare a Health Risk Assessment (HRA). Perchlorethylene is a Rule 1200 listed material. A HRA is not required only if the Permit to Operate is issued with a throughput limitation that assures risks are less than 10 in 1 million.

J-32 See response to Comment J-31 above.

J-33 This comment states the potential benefits to water quality from sustainable building practices cannot be certain to be realized unless they are required. The qualitative benefits to water quality from sustainable building practices are described in section 5.7.3 of the analysis of water quality impacts. Sustainable building practices are encouraged but not required by the UCSP development regulations and design guidelines. These practices are described in the DEIR as project features which may have a beneficial effect on water quality, but which are not required to mitigate significant impacts and thus are not presented as mitigation measures.

J-34 This comment requests that sustainable building practices be made a condition of subsequent development projects approval to improve water quality.

Mitigation Measures 5.7-1 through 5.7-4, ensures adherence to mandatory existing local, state and federal regulations governing runoff and drainage, and will provide sufficient protections against potential hydrology and water quality impacts. In addition, the City has proposed a Green Building Incentives program,

as provided for in Chapter 6 of the UCSP. Through this program and with the support of the recently established National Energy Center for Sustainable Communities, the City in partnership with developers, will demonstrate building performance and community sustainability improvements that are specific to the climactic conditions of the Urban Core Having demonstrated the economic and market feasibility of these potentially unique practices, the City may look to further enhance the incentive program as well as require more stringent performance measures. See response to Comment E-11.

- J-35** This comment recommends an additional water quality mitigation measure to assure that stormwater BMPs are required for projects of all sizes.

Mitigation Measure 5.7-2 in the DEIR (on page 5-141) accomplishes this goal. Mitigation Measure 5.7-2 reads: "Prior to approval of subsequent individual development projects, project applicants are required to identify storm water pollutants that are potentially generated and shall demonstrate to the satisfaction of the City Engineer that the proposed on-site storm drain systems fully mitigate drainage impacts and meet all federal, state, and regional water quality objectives and all City standards and requirements. Land development construction drawings and associated required reports, i.e., a hydrology and water quality study, shall include details, notes, and discussions relative to the required or recommended retention measures and Best Management Practices (BMPs). Permanent storm water BMP requirements shall be incorporated into the project design and all subsequent individual development projects are required to complete the applicable Storm Water Compliance Forms and comply with the City of Chula Vista's Storm Water Management Standards Requirements Manual."

- J-36** See responses to Sierra Club letter E comments.

Brian Sheehan

From: Peter Watry [p.watry@cox.net]
Sent: Wednesday, July 12, 2006 6:03 PM
To: Brian Sheehan
Subject: UCSP EIR

re: Urban Core Specific Plan E. I. R.

Two very minor errors in the history section:

K-1 Very bottom of page 5-78 -- it says that Juan (John) Forster was Pio Pico's son-in-law. Not so, he was Pio's brother-in-law. He married Pio's sister, Ysadora. I know there is one source that says "son-in-law" out there, but all the other sources make it clear they were brothers-in-law. Also I talked once with John Forster's great-great-grandson, Anthony Forster who is involved in the San Juan Capistrano history group. Of course he made it clear, too, that they were brothers-in-law.

K-2 Very top of page 5-80 -- it says that Rohr Aircraft moved to Chula Vista after World War II. No, as the following sentence in the E.I.R. makes clear, Rohr Aircraft moved to Chula Vista before World War II -- in the summer of 1941, six months before Pearl Harbor, to be exact. That is why what is now Chula Vista Shopping Center on-H Street was the first large wartime housing project (over 3,000 units); and why what is now Hilltop Jr. High and the Elementary School HQ next door was the second large wartime housing project; and why some of the many trailer courts that sprung up still exist west of Broadway.

Peter (picky, picky, picky) Watry

**Response to Letter K
Peter Watry**

K-1 This comment is correct and the following correction of the DEIR page 5-78 has been made:

"In 1845, the ranch was granted to Juan Forster, the ~~son~~brother-in-law of the last Mexican governor, Pio Pico."

K-2 This comment is correct and the following revision to the DEIR has been incorporated on page 5-80:

"Just ~~after~~before World War II, Rohr Aircraft Company, which was started in San Diego in 1940, moved to Chula Vista and established their operations of the bayfront."



Close

From: Susan Walter [SMTP:sdwalter@cox.net]

To: Mary Ladiana

Cc: Brian Sheehan; Ruth Alter

Subject: Historic section of the UCSP Draft EIR

Sent: 7/12/06 9:05 PM

Importance: Normal

July 11, 2006

Mary Ladiana and Brian Sheehan,

This letter is about the historic section of the UCSP draft EIR. I am glad that this document has been produced. It is wonderful to have the city include some recognition of Chula Vista's historic architectural heritage in the Specific Plan, and I am pleased that some guidelines have been included to help in evaluating resources in the future (as spelled out in Table 1-1 of the DEIR). I am delighted that there is inclusion of "vernacular/folk styles of any period" within the list of historical periods of significance. I believe this report, in its present form, can be thought of as the foundation for an even better structure.

I am writing, however, to call attention to some issues that deeply concern me.

L-1 First, I am dismayed that nothing was evaluated within the criteria of local significance. Local significance of individuals, for instance, is an important category to use when assessing a structure. Pioneer agriculturalists, land developers, merchants, civic leaders, and even operators of laundries, school teachers, and club participants are important components in local history. But the entire significance of Chula Vista, *at the local level*, is not addressed in this document. And although it is mentioned in passing, it is obvious from a review of the researchers' analysis and from the bibliography of source material (which does not list a major publication containing social histories of local families), that they did not consider local significance. This means that unless a resource fits within the State of California or National guidelines, it is not considered significant. It is so disappointing that our local history is given such short shrift. Chula Vista's rich local history deserves better.

- L-2 Second, I was quite surprised to find that the extensive and thorough survey that had been done by Karna Webster in 1985 seems not to have been effectively utilized. Her work should have been used as a starting point for this project, and cited throughout the document. All of the buildings she assessed that are within the current boundaries of this project should have been included in this report, with reasons given why the current authors felt they did or did not qualify as significant. The result of this omission is that Webster's earlier work appears to have been more comprehensive than that presented in the current analysis. As just mentioned several structures she recorded were not included in the present document. An example – a truly glaring oversight – is the failure to include El Primero Hotel, certainly a resource of importance, a beloved landmark, and prominently located near the middle of the study area.
- L-3 Third, the addition of only five more structures, since Webster's work of over 20 years ago, seems inadequate. Structures that did not fit the age requirement of 50 years or older in 1985 now do, and should have been assessed for significance. It is one thing to note an old building's presence and explain why it doesn't qualify, and quite another to ignore it entirely. An example here is the Garden Farms grocery store on E Street. This structure was not mentioned at all in this report. When it was built this business would have been of major interest to the local residents.
- L-4 Fourth, the original downtown Third Avenue area should have been examined as a potential historic district. This area contains several buildings of importance, and the basic original components consisting of 50+ years are in many cases still in place. Third Avenue originally was, and really still is thought of, as the main street of our urban core. Our Third Avenue could be interpreted through a "layers of history" concept, so that structures of different ages could become important tellers of the story of the growth of Chula Vista.
- L-5 Fifth, the Evaluation of Historic Preservation or Strategic Plan document, and also a City Council Resolution (in 2003), promised a door to door, complete assessment of the area was to be done. However, observing the peculiar clustering of the resources as shown on the map in the DEIR (Table 5.3-2) and the lack of mention of many clearly old buildings that exist in the area, a door to door survey seems not to have been done.
- L-6 Finally, based on similar reports from other entities, I expected a complete description of how the structures in this report came to be included, and why others of appropriate age are not. This information should be included in clear language within the final version of the Urban Core Specific Plan so that
- L-7

people who are directed to that document will understand exactly how this historic work was performed. It is not enough to put this language in the EIR. The Specific Plan is the document that people will be directed to consult; it needs to be *there*.

L-8

I hope in the future a city wide survey of *all* the historic properties within the city's boundaries will be done. Chula Vista, the second largest city in this county, and an increasingly important community, should not continue to falter in this respect.

In summary, the document is strong in that it addresses a need for recognition of Chula Vista's architectural heritage, but it requires more work performed in the areas of local significance, acknowledgement of previous work, and an explanation of why some buildings qualified but others were not included. Returning to my earlier simile, this report provides a foundation for a structure, but the walls are shaky and it is lacking a roof.

Thank you,

Susan D. Waiter

Principal, Walter Enterprises
238 Second Avenue
Chula Vista, CA 91910
(619) 426-5109

Response to Letter L Susan Walter

L-1 This comment states that the "entire significance of Chula Vista, at the local level, is not addressed in this document."

A historic context, based on local history and development, was developed and used to evaluate the properties within the UCSP. The CEQA guidelines for evaluation include local significance and eligibility for inclusion the local list of historic sites. A resource would only have to meet the State or National guidelines if it was to be considered for listing on those registers. A resource may be significant (at the local or regional level) but not qualify for inclusion on the state or national registers. The evaluations were conducted within the local historic context utilizing the CEQA guidelines/criteria. For example: page 5-90: reads that to be significance under Criterion A, B or C ... A UCSP property must be associated with one or more historic events or trends defined within the historic context of the urban core area. To clarify, the following revisions to the DEIR have been made:

Page 5-90: "Determination of significance was thus based on assessment of the property within its local historic context and eligibility for listing in the register(s) the CEQA Guidelines criteria of historical significance."

Page 5-91: "Below are descriptions of the five buildings found eligible for local listing or designation under the local ordinance within the historic context of the urban core."

Page 5-95, Section 5.3.2, Criteria for Determination of Significance, Criterion 1 has been revised to include the following replacement: "... that meets any of the following criteria:

- Is associated with events that have made a significant contribution to the broad patterns of California's history at the local, regional, state or national level and cultural heritage;
- Is associated with the lives of significant persons important in the our past on a local, regional, state or national level;
- Embodies the distinctive characteristics of a type, period, region or method of construction, or that represent the work of a master an important creative individual, or that possess high artistic values; or

- Has yielded or may be likely to yield, information important in history or prehistory-or-history."

L-2 Changes have been made in the DEIR in response to this comment. Section 5.3.1.4 in the DEIR, Historic Sites in the UCSP Area, has been revised to include a description of the City's 1985 Historic Resources Inventory on page 5-86 and an additional subsection on page 5-89 entitled "Other Sites of Historical Interest" that includes identification of the People's State Bank, El Primero Hotel, and the Charles Smith Building as sites of historical interest.

L-3 This comment questions the addition of only five more historically significant structures since the 1985 Karna Webster study, and refers to the 2005 report prepared for the UCSP which detailed the findings of 50 buildings assessed for potential significance. The 2005 report comprised a focused survey that augmented the 1985 inventory, and was not intended to be representative of a comprehensive survey of the UCSP Subdistricts Area. The area around Third Avenue and F Street is considered to be the historic core of the City and includes important elements of the early residential and business activities of the City and therefore this area within the UCSP Village District was the focus area for historic evaluation. The structures were selected based on the periods of significance described in the DEIR in Section 5.3.1.2 and include mostly structures within the Village District along Third Avenue, the City's traditional downtown, and adjacent side streets. The sites are also all located within adopted redevelopment areas and thus have an increased potential to redevelop over the short- to mid-term. The potential for the existence of other significant historic properties within the UCSP Subdistricts Area is possible given the number of older commercial structures and homes throughout the UCSP subdistricts area. Pages 5-89 and 5-90 of the DEIR have been revised to add this clarification.

L-4 This comment recommends that the original downtown Third Avenue area be examined as a potential historic district. Opportunities for potential historic overlay or districts will be explored through the City's Historic Preservation Program, currently under development. Since City Council acceptance of the "Evaluation of Historic Preservation in Chula Vista" report, staff has been working to develop a multi-faceted program, aimed at protecting historic resources within the City. The draft program being developed includes both regulatory and non-regulatory techniques. Several historic preservation policies have been incorporated into both the Land Use and Environmental sections of the updated General Plan as a result of staff's efforts. Furthermore, City staff has coordinated with the State Historic Preservation Office in order to develop a comprehensive program that will meet the needs of the community as well as qualify the City for Certified Local Government status.

Staff is now finalizing a draft Historic Preservation Program that is comprised of:

- A historic preservation ordinance
- A qualified Historic Preservation Review Board
- A recommend historic survey process that delineates and prioritizes areas to be surveyed in phases
- A certified local government application request
- A process for the development of design guidelines for historic structures
- Incorporation of historic standards within the zoning code update

The draft program that is being developed is modeled after cities with similar size, demographics, age of resources, all which are Certified Local Governments whose programs are recognized as good models by the State Historic Preservation Office. Staff will present the draft Historic Preservation Program to the appropriate board, commissions and public groups for input over the next several months. In response to this comment the foregoing information, as stated in a City memorandum, has been appended to the DEIR.

L-5 The Historic Evaluation Preservation Report, as presented on page 5-83, contained several recommendations for a City Historic Preservation program/ordinance. This text has been revised to add the following two bullet points for clarification of the goals of the City's program development efforts.

- Establish a survey and inventory process
- Explore opportunities for potential historic overlay zones and/or districts

See also response to Comment L-4 above.

L-6 See responses to Comments L-3 and L-5.

L-7 See responses to Comments L-3 and L-5.

L-8 The comment states the author's hope for a citywide survey of all historic properties within the city's boundaries. Since the comment addresses matters beyond the scope of the EIR, no further response is required. Please also see responses to Comments L-1 through L-7.

-----Original Message-----

From: abuzaitis@cox.net [mailto:abuzaitis@cox.net]
Sent: Thursday, July 13, 2006 2:46 PM
To: Brian Sheehan
Subject: Comments on Draft Urban Core Specific Plan & DEIR

Mr. Sheehan,

This email is in response to the Public Notice of Availability of the City of Chula Vista Draft Urban Core Specific Plan and Draft Environmental Impact Report (EIR 06-01).

First off, I would like to express my support of the ideas and vision of the Draft Urban Core Specific Plan (UCSP). The following are a few general (housecleaning) comments on the UCSP and EIR:

EIR Comments

- M-1 - Pages 3-1 and 4-1: The City of Chula Vista is NOT located 18 miles north of the international border. Please correct to depict the accurate distance.
- M-2 - Page 5-149: Why was a Florida Department of Transportation method used to estimate 24-hour street segment capacity using the 2000 HCM procedures? Please clarify.
- M-3 - Page 5-208: The Chula Vista air quality monitoring station, located at 80 E J Street, is not located in downtown Chula Vista, as is indicated in the second sentence of the second paragraph of Section 5.10.1.2.
- M-4 - Page 5-245: Fire Station No. 1 is located at 447 F Street, not 477 F Street.
- M-5 - Page 5-275: Second paragraph of Section 5.12.3.1 - The San Diego county Solid Waste Division has been split into 1) Inactive Landfill Management and 2) Solid Waste Planning and Recycling. The Solid Waste Planning and Recycling Division of the Department of Public Works is the group that administers regional solid waste planning.
- M-6 - Page 5-276: The last paragraph of Section 5.12.3.1 notes that the Otay Landfill is expected to operate until 2028. The UCSP depicts a buildout of the Urban Core until 2030. Where would solid waste be disposed after 2028, if Otay Landfill were to close in that year?

UCSP Comments

- M-7 Page V-10 of the Draft UCSP: section b (South Bay Transit First Project) - Why is this description included? This project does not appear to include the UCSP area nor any area west of Interstate 805.

As a young professional, who grew up in Chula Vista and chose to purchase a home within the UCSP area, I look forward to the exciting atmosphere that is envisioned for the future of the Urban Core. I will welcome the increased density, so long as the traffic impacts associated with high density are mitigated or avoided, and not just overrode by the City at the time of the Findings/SOC. It is my hope that the UCSP will revive life in the Urban Core of Chula Vista, and bring long overdue improvements to the west side of Chula Vista.

Thank you for considering my comments.

Anna Buzaitis

Response to Letter M Anna Buzaitis

M-1 This comment is correct and pages 3-1 and 4-1 have been revised accordingly. The proposed project area is approximately 8 miles north of the international border. The southern boundary of the City of Chula Vista lies approximately four miles north of the border.

M-2 The report conducted by the Florida Department of Transportation is a document referenced in the General Plan EIR. The report describes the relationship of a roadway's daily Level of Service to its physical features and attributes that improve or degrade the roadway segment's operation. Such features include the signal spacing, the amount of on street parking, if any, and driveway locations and spacing. No local jurisdiction had published a similar document that addressed the issues discussed in the General Plan and the proposed UCSP.

The Transportation Study focused on the long-term transportation related impacts of the General Plan Update, using existing conditions as a baseline for comparison (Plan to Ground analysis). The existing performance standard of LOS C is not appropriate in more urbanized contexts, such as Chula Vista's Urban Core. Increasingly, communities such as Chula Vista are questioning the sustainability of maintaining automobile levels of service in "transit corridors" and "town centers," major centers of economic, social and transportation activity. In fact, the California legislature recently enacted SB 1636 to exempt automobile levels of service standards for Congestion Management Program systems in "infill opportunity zones," areas of concentrated development around transit centers. The Urban Core Circulation Element promotes the use of revised level of service standards for certain corridors and centers served by transit, alternative ways of measuring level of service for vehicles, and possibly establishing level of service criteria and performance measures for other modes of travel. It should be noted that H Street from the I-5 Freeway to Broadway, which is a four-lane major roadway currently, would be improved to be a six-lane Gateway Street, pursuant to Mitigation Measure 5.8.5-1.

M-3 As observed in this comment, the Chula Vista air quality monitoring station is located at 80 East J Street, which is just east of the downtown Chula Vista area.

Page 5-208 has been revised to read: "The nearest air quality measurements to the project site are made in at the monitoring station at 80 East J Street east of downtown Chula Vista by the ..."

M-4 In response to this comment, the following correction of the DEIR has been made on page 5-245:

"Fire Station No. 1 is located at 4477 F Street within the UCSP Subdistricts Area."

M-5 The comments states that the San Diego County Solid Waste Division has been split into 1) Inactive Landfill Management and 2) Solid Waste Planning and Recycling and that the Solid Waste Planning and Recycling Division of the Department of Public Works is the group now responsible for administering regional solid waste planning. Comment noted.

M-6 The comment addresses the remaining capacity at the Otay Landfill. The Otay Landfill Permit Modification Agreement approved on May 17, 2005 indicates that: "In the event that the Otay Landfill is not successful in achieving the expansion of the Sycamore Canyon Landfill, the Otay Landfill agrees to revisit the disposal capacity issue and negotiate terms for additional remedies which will protect the landfill capacity available to Chula Vista rate payers, in accordance with the terms of the Amended and Restated Solid Waste Disposal and Recycling Franchise Agreement [Franchise Agreement] effective July 1, 1999, to which the City and Otay Landfill are parties."

Section 6.2.15 of the Franchise Agreement states that: "Pacific shall dispose of solid waste at its expense, at the Otay Landfill or the Sycamore Canyon Landfill, both being City authorized landfills, in accordance with all applicable law, or such other landfill mutually agreed upon by Pacific, City, Otay Landfill Inc., and Sycamore Canyon Inc." The Franchise Agreement is in effect until after June 30, 2028, with extension clauses for both the City and Pacific.

M-7 This comment refers to the Plan itself and not the adequacy of the DEIR.

Jackie Lancaster, representing Grandparents of America, no phone or address provided

- N-1 CVRC members and members of the public. If ever Chula Vista had a crisis in front of them, today is that day. The people of Jade Park and other mobilehome parks are not exaggerating when they tell you they have no one to turn to and nowhere to go. Some weeks ago at the mobilehome park meeting here, I read off some of the facts that I had discovered. If you apply for rental assistance, the wait is 5 to 7 years. If you apply for Section 8, the wait is 7 to 11 years. If you look into affordable housing, the Community Development Department has a 3 page list and the cheapest available unit on that list is \$700. Not many people in Jade Park or any other senior mobilehome park could pay that plus utilities, plus food, plus medication, plus transportation. I even called about shared housing and even that process would not be useful to most people that live in mobilehome parks. When I spoke of these facts at the mobilehome park meeting some weeks ago, I was told by the Mayor – Mrs. Lancaster, you're scaring the living daylights out of these people – and I was referred to City staff who tried to be helpful. But the plain fact is that there is no safety net for the many, many people who will be displaced by redevelopment. Even Mandy Mills of Redevelopment said there is not enough relocation funding and that's just through the normal process. But in the case of Jade Bay where the owner has found a way to get around what safety net or what relocation ordinances the City has. Now what? It is a crisis because this is just the first domino, the other parks will likely follow suit if nothing is done now to address this tragedy of throwing elderly and disabled people out onto the street. I have asked several authorities whether displacement of human beings is considered an environmental impact issue or not. The answers are unclear. Therefore, it is my strong recommendation that this EIR in Item 3 not be accepted until these legal issues about displacement of human beings are addressed. Because this is only the beginning. We must face the issue of the Jade Bay residents for their sake and because the floodgates need to be closed to other park owners who would take advantage of the elderly and disabled out of sheer greed. Frankly, I think the situation falls under the category of elder abuse and we need someone to step in and stop it. So please, hold up on the EIR, at least until we know whether throwing sick people out on the street qualifies as an environmental impact. Thank you.
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- N-3

Frank Zimmerly, 290 Shasta Street, 619.427.2083

- N-4 First I would like to say thank you to CVRC and to the Councilmembers that are here. I appreciate the job you are trying to take on and I realize the City needs redevelopment, so despite some of my comments perhaps, I do appreciate the job you are taking on. On reading the EIR, I became concerned and interested in the fact that you used the 2.58 on deciding how large our population would increase in downtown, well west Chula Vista, you used the 2.58 times 7,100 units which would be expected to increase the population to around 18,318. And so, I started looking around for the 2.58 and I went to the census bureau and they use the factor of 2.59 which I thought OK that's reasonably close but unfortunately the 2.59 applies for all over the United States. When you look at California, the household unit would be 2.87 and, if you look at Chula Vista, that multiplication factor should be 2.99. So I was wondering how applicable the number is for Chula Vista. Also, I was looking at the traffic report, traffic analysis, and I saw the information used to determine in the traffic analysis was from 2001, February 13, and I became
- N-5 concerned at how accurate then the forecast will be for traffic, especially when you consider that especially for between H Street and E Street, you figure there will be a LOS level of E, and could it be worse now, I mean 2001 is fairly old. Which brings up another a question that I have is on reading the EIR I saw that we have a Municipal Code, which I am sure you are all aware of,

N-6 19.09.040 which determines the quality of life factor that we have here within the City. It is required within the City to maintain a LOS level of C, no worse than D, during peak hours, and if it's already an economic degrade any worse than 1991 levels. Now, if the EIR is approved, the courts can go to the CVRC and they will be under State legislation, which falls under SB 1636, which can override our own Municipal Code. But I am wondering, can our City Council, realizing the factors that will come upon the EIR the way it's written, they'd be overriding their own Municipal Code. Anyway, thank you very much.

Greg Moser, of Foley Attorneys at Law, 402 W. Broadway, San Diego, 92101; 619.685.6426 (representing Earl Jentz)

N-7 We've submitted comments in writing to the Project Manager and distributed to you this evening my comments and I think Joanne has with her her comments. I just want to highlight a couple of those things. The first is how the EIR deals with historical resources. You have actually a wealth of knowledge in the City about historical resources. For your 75th City anniversary, you actually did a book that was available for sale that identifies a lot of buildings that are of historical value. Somehow that isn't picked up in the EIR at all. You also did a historical, your Park and Rec Department did a historical resources inventory, again it doesn't seem to be in the EIR. And then we contacted the historical society which gave us a list of other properties in this study area that are of historic interest. So we have given you in our handout some excerpts that show where those properties are and what they are and we think that, in order to have a comprehensive picture of the historical cultural resource that you have in this area, that needs to be reflected in your EIR so that you know what area you might impact and in effects what kind of mitigation you'd do. So that's just seems to be an omission in the EIR there is some kind of survey done but it's a small portion of what the City's already identified itself as being historical stuff. Land use consistency – three quick comments on that. One is that the Cummings Initiative seems to be inconsistent with what you are describing in the EIR in a couple of respects. First, the Cummings Initiative, the whole purpose of it was to prevent – one of the purposes – was to prevent traffic from getting worse and so all of your plans are supposed to be consistent with not making your traffic worse and, as we know from reading the EIR, you have concluded that there are adverse traffic impacts. So the document describes – it doesn't mention the Cummings Initiative, so I think that's a problem. The Cummings Initiative also prevents upzoning more than one level for residential properties. Again that isn't referenced in the document and the document seems to allow bigger steps than that, in fact, encourage bigger steps than what the Cummings Initiative allows. The character of the village district we think would be adversely affected by allowing the intrusion of your 84 foot height limit into really your downtown village area there in a couple of areas. Really on the ends of the V-II designation that those ought to be extended up to E and down to G to really to avoid conflicts between adjacent land uses. And then your General Plan has language about harmonizing and blending in different kinds of uses that are next to each other and again when you look at the juxtaposition of some of the designations you don't you know you have some language like that in the General Plan but there is nothing in the Specific Plan that really emphasizes that part of it. Lastly, the housing and population displacement, you acknowledge pretty clearly that you don't have a Housing Element yet that you have adopted which really should prevent you from moving forward on other General Plan changes. But the worst part of that is that you don't really have a factual basis for the conclusions in the EIR that say that yes, there's going to be a displacement of people, yes, there's going to be replacement of housing or change of housing – but there's no

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- N-14 factual basis for it. That's what would be in your Housing Element, or it would be in the EIR, but it's not there so instead you make the problem invisible in this EIR and obviously we've got a number of people here tonight who don't think they are invisible and who think that you ought to have the details of what the effect is going to be on low and moderate income housing in the downtown area. If you read the EIR, it basically says it's a temporary phenomenon so we aren't going to worry about it, and there's really again no factual basis for those conclusions. In fact, it concludes that, even though you're increasing dramatically the number of housing units, that it's not going to have any affect on the people that currently live there and you can't just ignore, the EIR shouldn't ignore, the existing conditions. So with that I am going to turn it over to Joanne.

Joanne Hadfeld of the Planning Center, 1580 Metro Drive, Costa Mesa, CA 92626; 714.966.9220 (representing Earl Jentz)

- N-16 Good evening Chairman and Board Members. My name is Joanne Hadfeld. I did cut it very, very tight, but I got here right when you started this item. I am the Director of Environmental Services for the Planning Center located at 1580 Metro Drive in Costa Mesa, California. My testimony is tonight on behalf of Earl Jentz, a Chula Vista resident since 1976, and a property owner of three properties in the downtown area. We were retained to conduct a third party review of this Environmental Impact Report. My focus is on California Environmental Quality Act compliance. I don't pretend to know the City inside out, I am very directly looking at CEQA issues and compliance. The Planning Center has 30 years of experience preparing General Plans, Specific Plans, and EIRs, including recently the General Plan for the City of Anaheim, the County of Riverside, and the City of Rancho Cucamonga. We received an award from the APA for outstanding planning for a large jurisdiction for the general plan for Riverside County. As primary reviewer for the EIR, I personally have 25 years of experience preparing EIRs and a background in urban planning and civil engineering. We have in-house air quality and noise specialists that did a technical review of those topical areas and we worked with a firm – Urban Crossroads traffic engineering firm – to evaluate traffic and parking impacts. And I will give you the copies of the comments as soon as I have finished this presentation and we have submitted them to the City Planning Department. As noted in our letter, we found the EIR to be a well-written, organized and meaningful analysis of the project. For the most part, very impressed with the document and the analysis – it's easy to follow, it's very well organized – so as a fellow practitioner, I'm impressed with the document overall. My comments, I want to focus first a little bit on the environmental process and some of our questions that we hope could be addressed in the final EIR, followed by individual comments on topical sections addressed in the document. We agree that the appropriate documentation is a program EIR and that subsequent review should be addressed for individual projects in the urban core in accordance with the program EIR in the CEQA process. One question we did have is we did not understand why an initial study was not prepared for this EIR. As far as we know an initial study was not prepared. CEQA does not mandate that an initial study be prepared once a lead agency knows that they are going to prepare an EIR, but Appendix G of the CEQA Guidelines provide a checklist that ensure if you do an initial study that you comprehensively address all of the potential environmental impacts. As I go through my comments, you'll see that, because an initial study wasn't prepared, we believe that some important environmental impacts were not addressed, but were overlooked. We are also recommending that more subsequent review in the urban core area that the secondary study identified for the development review process consists or at least includes environmental checklist for the same reasons. We found that the EIR did not address

- N-21 construction related impacts for noise at all, did not address vibration impacts. These are very specific significant thresholds in the CEQA Guidelines in the Appendix G threshold and, if the preparer did go through all those questions, somewhat forced to address some of these issues that I bring up now. So comments by EIR section, we are hoping, we do feel it's a good document, hoping that these issues can be addressed in the final EIR with supplemental analysis and mitigation as necessary.
- N-22 Noise and Vibration – The CEQA initial study checklist includes a threshold related to potential vibration impacts and also a threshold regarding temporary or periodic noise. The EIR does not address potential vibration impacts or construction related noise impacts at all. Vibration levels by existing and future use of the rail line should be evaluated for those proposed residences in proximity to the rail line. The noise analysis also needs to evaluate vibration levels generated from construction equipment which may result in damage to fragile historic or potentially historic structures. The noise analysis doesn't address sensitive uses, existing sensitive risk issues uses, it focuses on those units that will be built and future uses. Needs to address the potential impacts to existing uses. May I have maybe a minute and half or two and gloss over my other comments? [McCann] I'll give you one more minute and then just clarify it I have this document from Mr. Moser is this include your comments. [Hadfeld] I have copies here. [McCann] OK, then we can make sure that the City Attorney and everybody gets your written statement as well. [Hadfeld] OK, very quickly then – population and housing, I agree with Mr. Moser's comments. The potential impact for those potentially displaced housing units and people, not adequately addressed. It is a CEQA issue, it is a specific significant threshold in the initial study. Parking issues – although fully described in the project description they are not analyzed in the document and a very important issue that also is a significant threshold from CEQA that if it followed the initial study would have been forced to be addressed. Land use compatibility – we disagree with the conclusion that impacts would be less than significant given potentially significant noise, traffic, parking, vibration and air quality issues. Alternatives – see my comments. We disagree with the conclusions there, although we don't disagree with the preferred superior alternative. In summary, we look forward to formal responses and, hopefully, some supplemental analysis in the final EIR. In general, I think it's done a great job. Thank you.
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Walter Doughty, resident of Jade Bay Lodge, no phone or address provided

- N-28 Well, first of all, I'd like to thank all of you people here. I may, you may not be so happy to see me after I get through. Well, we have a condition here that you don't seem to understand. We have 75 units in the Jade Bay and this high density I seem to be getting a runaround when I ask what is high density. Now I realize you are not going to build 40 story hotels down there where the trailer park is but what do you mean by high density. Because we have 75 families living on about 3 or 4 acres, now how many families do you want to live on 3 or 4 acres. I'm waiting for an answer. Now somebody should know this, now obviously none of you do. Now are you running things properly because this should be, shall we say in the building code or the you know, how you're going write it, you're going to have it R4 or whatever. But high density, let's define that. Can somebody define that for me? Well, there you go. [McCann] Mr. Doughty [Doughty] Now I've been in the real estate business for 20 or 30 years and I'm not in that business anymore and, if a project doesn't make money, you don't do it. Now if Kubota can run all these 75 people out and build 150 units there, then perhaps he can make some money. But now if you people say he can only building 20 units there, and remember a unit is one family. If you have an apartment house that has six units you got six families living there. Now we got 75

N-29 as I said living there now. If you want to cram 150 people in there, fine, and I don't care because I'm going to be gone pretty soon, thank the lord. And, I'm not going to have to put up with it. But if you are making a slum there, which you very well may, you have to think seriously of what you are doing to Chula Vista. Because I've been living there about 15 years and, gee, I think it's the greatest place in the world. But if we have 300 people living there where 200 live in there now, this isn't going to be so good. So think about what you're doing 'cause Chula Vista is a nice little town. OK?

Candelaria Orozco, resident of Jade Bay Lodge, 701 D Street, Space A-5; 420.3268

N-30 [Patricia Chavez translating] She wants to know what is going to be done. She has invested all her money into that area and she wants to know what kind of help is going to come to her. She can't work like the youth now and.....She's happy where she is, she's retired, she had to retire because she's disabled and she doesn't want to move anywhere else. She's happy there, she's invested all her money there and she needs our help. She says she loves this country, this country has given her opportunities and she's never asked for help, she's been able to work, she's been able to maintain herself, she has invested her money in her home now and she's coming to us for help, the first time she's ever asked for help. Just because she wants a place to live, she can support herself, she just needs her home.

Irene Amick, 701 D Street; 425-8966

N-31 I'm an endangered species, I'm old. When you get old, you're out priced. You can't afford the things you had when you were young and Chula Vista has gotten very, very expensive, and when we found our home out here at Jade Bay, we thought, wow, this is the place for us. But, now, there is no place for us in Chula Vista. I have to leave, I'm going to have to relocate back to the Antelope Valley, but I look at you and you guys are young and you think, boy, these seniors aren't real smart with their money. Well, I'll tell ya, you save your money, but you don't count on illness. Illness can take and rob your bank account when a spouse gets sick. There's many reasons why we're all in mobile homes – they're easy to take care of, the price is right for us and, if you change the zone on all of these mobilehome parks, you're putting old people out in the street and one day you too will be old and you'll be thinking, well, I'm not going to be in that position, but you don't know. So, I think, think twice about rezoning our area. Thank you.

Barbara Nunnelee, no phone or address provided

N-32 Hi guys, I've seen you before. I'll make this as brief as I usually do, but I did talk to Stacey to get some more information and I have never seen so much shorthanding of what it took so far to come to trying to relocate us out of here. I'm looking at everyone of you, not one of you from the last meeting had any indication to keep our park, help us if we get a non-profitable association, we can own the park or whatever. You buy the park, we'll pay it for you. But the only indication I got that night was relocation. We do not, I repeat again, we do not want to be relocated. I've been here too many years and a lot of them behind me. We clean our own yard, we do our own thing, we work, we ask nothing, just this lady before me and after me. We maintain our little bit of medication and food we can afford. I'm on Section 8, it's not killing me, not yet, and I do my best with what I can. But what I'm asking you guys, I want you to turn the page over, don't get us relocated, we don't want to be relocated. What do we have to do to do that? We are, myself, have tried to look into these non-profitable associations, maybe they can

come in. Would you guys help these guys together so we could keep our park and live where we are? Is that much to ask, please? Thank you.

Ken Wright, 729 Glover Avenue; 422.7962

- N-33** Hi, my name is Ken Wright. I'm a resident of Chula Vista. I've lived here all my life. There's some things that I wanted to say regarding the adoption of the Urban Core Specific Plan Draft EIR. First, I wanted to hit on one thing the lady just said and at the Northwest Civic Association meeting just this last Monday, the housing representative from the City spoke. And one of the items I brought up was that maybe the City should go out and solicit some of the apartment owners and/or mobilehome owners and offer them some kind of incentive to maybe keep their properties or to actually provide low income or affordable housing in the existing apartments that are already within the City and maybe that could expedite the whole process of getting more affordable housing, especially when you have instances of the bankruptcy at Jade Bay, which just throws 70 plus people out on the street – well, not out on the street, but they have to look for somewhere else to live. And, if the City had a program where they could go out to existing property owners and say – heh, we'll give you an incentive or some kind of a bonus if you can provide us with maybe five units of affordable housing in your complex. Because you don't want to have just one whole apartment complex of affordable housing because now you're just pushing all of the low income people into one big bundle. With that being said I wanted to go
- N-34** onto the other items I had and one of them ends up dealing with that. I feel that the Draft EIR should include a well-defined housing outline as to how relocation assistance will be provided by the City or developers or both for all tenants who would be affected by the changes in zoning, redevelopment, or even the bankruptcy. Secondly, I feel that the parking and traffic impacts on the neighboring residences of the Urban Core Specific Plan areas have not been outlined or resolved. Most of these neighboring residential streets have already achieved this walkability theme that we were going for in the Urban Core Specific Plan. And, also, these neighboring streets are of disrepair, a lot of them need to be repaved, a lot of them need to be reworked altogether, and if you add a lot of traffic onto that then its just going to make it a lot worse. And
- N-35** finally, I think that the height limit along Third Avenue should stay at 45 feet throughout the whole village area and just get rid of the whole 84 feet in the select areas because I think you want to keep the uniformity and just keep it that downtown feel,
- N-36**

Jose Preciado, representing the South Bay Forum, 601 Myra Avenue; 619.922.2209

- Chairman, Council, other Directors – I think what's most challenging to myself and those I represent – my name is Jose Preciado, I'm a resident of Chula Vista, 601 Myra Avenue. I think what's most challenging for those – you have a lot of wonderful people here speaking out for themselves. But I'm thinking of those families and those poor unfortunate who are not here speaking for themselves, able to read an EIR, able to understand all the nuances and all the particulars that come with CEQAs and other regulations that you must observe. What I do think is – and I appreciate Ms. Orozco's presentation in particular – we're talking about the dignity of families who have made a commitment to be citizens of Chula Vista. They were not looking for handouts, they are not looking for anything, they are just looking for a fair shake. When we look at redevelopment typically the biggest problem with it is gentrification which does cause displacements and so in some of your documents you are planning for that type issue by requiring some sort of percentages setasides, if you will, for low income housing. But we have an issue that we have a fully populated area now that I don't believe that any of them think – oh
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what a squalor we live in, or what a problem we live in, or couldn't we look better or anything like that. I think you have families that need to be respected and some of us some of our organizations will be committed to looking to the issues associated with displacement. There has to be a process. These EIR – I know some of us have been calling on – not just in this City but in others – to build into these discussions the impact on the community, the impact on the humans, if you will, not just the built-in environment and we need to look at it the housing situation in this fair county of ours is extreme. We cannot simply look to how do we improve our tax base. What we should be doing is how will we improve our total community and that includes those who are least among us. I am hopeful that as you act today and in future meetings you will be considering what is happening to these families. Thank you.

N-38 Pamela Bensoussan, representing NWCA, no phone or address provided

Thank you, my name is Pamela Bensoussan, and I'm speaking on behalf of the Northwest Civic Association and I'm speaking about the historic element to the draft EIR. In the and I must start by saying that staff has been very helpful. I have met with them, I have met with the project manager and with the historic preservation person in Planning and they have come up with an idea that that may be a way to solve some of these problems so they looked at as impossible to attain the right mix in the EIR but it I nonetheless wanted to get these concerns on the record so that is why I am here tonight. In the entire urban core, which the EIR analyzed, only 50 properties were evaluated representing just five or six blocks evaluated for historical significance. One block on Third, two blocks E, one block on Landis, and two blocks on Church and the document lacks a detailed explanation of why only 50 properties were evaluated.

N-40 Without this explanation, an inaccurate picture is painted of the historic resources in the urban core. A gigantic flaw in the EIR is the failure to identify the work that was done previously which has an enormous wealth of information even though it's an outdated survey dating from 1985. The quite a few properties in that survey in the urban core boundaries, the project boundaries, that have already been identified as eligible for historic designation and this was entirely absent in the EIR. So this is something that I think is where the document is lacking.

N-41 And in seeking to understand why those particular blocks were chosen other than the economic reasons that they only had so much money to spend on evaluating so many properties, it occurred to me that these properties are the ones in the village that are the most likely to be close to some soon to be redeveloped projects. But I would like to point out that there's properties scattered all throughout the urban core. In particular, there's one of the oldest Victorian houses in Chula Vista is in the 700 block of Broadway and the Chula Vista City Council voted unanimously to come to the rescue of this house when it was threatened by demolition several years ago and went on record as stating that funds would be found to move the house to save it because the owner at the time was seeking a demolition permit. Such a fuss was raised by the community about the potential loss of the structure that the owner began to change his mind and actually he ended up by deciding that was a cool thing to own and he then was convinced that it shouldn't be torn down and it's still standing. But it's sandwiched, partially obscured, behind a small car lot that will is definitely a prime candidate for a redevelopment project – it's right in the heart of the

N-42 redevelopment part of the urban core. So the fact that these types of properties that are already listed in as eligible for historic designation in an existing survey – this needs to be corrected. Other obvious historic properties that were not identified – things like the El Primero Hotel, the Memorial Park Bowl, which is a WPA project, cultural landscape so I feel that the document is inadequate in the historic element. And one of the solutions that we came up with talking with

N-43 staff was to create a whole other chapter in the EIR that addresses buildings that are listed in the '85 survey that got left out that weren't in the EIR. And another thing that I find in the EIR that's
N-44 lacking. Am I out of time already? Well, can I just say very quickly – OK, I'll summarize – from the bibliography in the DPR text they reveal that there was not a local criteria that was actually used to determine to evaluate these properties as historically significant. The criteria that was used was what is standard on the state and national level, and; when Chula Vista adopted the strategic plan, it included a local and regional criteria that needs to be these properties need to be re-looked at on a local level, some of them that were passed over because they aren't of national significance or of local significance. Thank you.

N-45 Lisa Moctezuma, representing T.A.V.A., 289 Third Avenue; 619.426.1283

Hello – Hi everybody – thanks for listening to us. My name is Lisa Moctezuma, I'm a Chula Vista resident, I'm speaking on behalf of the Third Avenue Village Association, I'm their current president. First I would like to convey the organization's support for the UCSP and the EIR. We are eagerly looking forward to the revitalization that this redevelopment tool can provide. We'd also like to thank the City for its recent support of the PBID, including the expansion of its boundaries. I really wanted to express our sincerest thanks. We had a couple of constructive criticisms about the UCSP and the EIR that I'd just like to note. We were hoping that the City
N-46 and the CVRC would consider raising the maximum height limits within the V-I and V-II areas to 60 feet with a proportional increase in the FARs. The Board feels that the proposed 45 foot restriction almost guarantees that no redevelopment will occur because it does not provide sufficient economic incentive to demolish or to add onto existing structures. We don't have vacant land that we're developing so that's a real challenge in the V-I and V-II, especially the V-II areas. We certainly understand many of the community groups wish to reduce the height in the specific portion of the Third Avenue frontage from 84 feet down. We certainly can accept lowering that to 60 feet, but we would like to see the rest of the Third Avenue frontage be allowed to go to 60 feet. However, having said that, we really feel that it's important to have
N-47 stepback (setback???) requirements and other strict design guidelines that would require high quality design and materials that would be in keeping with the historic qualities of the Village. The Board feels that with, even though this is a proposed height increase, if there are stringent guidelines on maintaining the historic character and the appropriateness of projects that would be between 45 and 60 feet, that that would still maintain the Village character which is very important and I just want to reiterate that that's paramount. While we do wish to see the height be increased so that the economic viability will be there for the projects, the historic quality is
N-48 absolutely essential. The second concern that we have is that we are concerned that pending and future projects within the Village that have a low urban standard parking requirement and that displace current existing public parking may cause an undesirable parking shortage that would negatively affect the businesses in the district. Before these particular projects are approved, the City should have a plan in place that will address the Village parking needs with the funding sources identified and, if the parking study hasn't been completed, we feel that the City should either require developers or provide on its own those funds set aside so that if when the parking study is completed there's the conclusion that additional parking is necessary the funds are available. Just one quick personal note, speaking for myself, I was extremely touched by the speakers on behalf of Jade Bay and I certainly hope there's some way to think outside of the box for them. Thank you.

N-49 Patricia Aguilar, representing Crossroad II, no phone or address provided

Thank you. Patricia Aguilar, representing Crossroads II, again. We believe that the EIR on the Urban Core Specific Plan is inadequate in at least three respects. Those respects are the

N-50 following: #1 is a procedural issue. The Notice of Preparation, which is a Notice of Preparation that goes to the public letting everyone know that you are preparing an EIR so that the public can tell you what issues they believe should be covered in the EIR. The Notice of Preparation was issued I'd say, I'm not sure of the time but a long time, maybe a year or so before the actual plan document was available. Our belief is that is inappropriate, if not illegal. You cannot adequately comment on issues that should be covered in the EIR unless you understand the project and you cannot understand the project when the document that describes the project is not available.

N-51 Second issue is the Cummings Initiative. When the General Plan EIR was up for review, we asked well why doesn't it address the Cummings Initiative. The answer was that the Cummings Initiative deals with zoning; therefore, since the Urban Core Specific Plan will replace the zoning ordinance for areas covered by the plan, that will be addressed in the Urban Core Specific Plan EIR. Well, it isn't in that EIR either. This is a major, major inadequacy in that document. The third point is the displacement issue and I would just like to read you two sentences from the EIR. This is on page 5-128 – The Urban Core Specific Plan will not displace substantial numbers of people necessitating the construction of replacement housing elsewhere. Although the removal of existing housing may result in a temporary displacement of some people, the displacement is not considered a significant impact because the numbers of units planned in the Urban Core Specific Plan are sufficient to accommodate the affected population. That is a

N-52 boldface lie, there is no other way to put it. Even though the numbers are sufficient, the fact of the matter is, because the Urban Core Specific Plan is a gentrification plan, the problem is the people who are displaced will not be able to find new housing in the same area. This is a critical issue with which the EIR ignores. When we raised this issue with the General Plan, former City Attorney Mullen told us, this is at the Planning Commission, that that was a socioeconomic impact, not an environmental impact. And I don't know if that is true or not, I am not an

N-53 attorney. But whether it's addressed in the EIR, or whether it's addressed in some other
N-54 document, this issue of what happens to these people now that the owners of the land that they sit on have been given a huge windfall by this rezoning. What happens to those people has got to be addressed somehow, someplace, somewhere. So those are our comments on the inadequacies in the EIR and we hope that we look forward to seeing their responses. Thank you.

N-55 Emilia Perez, rest of Bayscene Park (MHP), 100 Woodlawn Avenue, Space 79; 619.427.1629

I came from Bayscene Mobile Home and our question is it is happening that to us also. Only in another way. The owner is increasing the rent and we're never going to be able to pay. Its only different, I think he thinks its smarter not to say it clearly. But, I mean, we are paying too much when any reason taxes, trash. He increased all those tiles whenever he can even the electricity. He's increasing everything and soon also we are going to be ending on the street because now you can see empty spaces because the people can't afford to pay the rent. And also, I mean for us, for the Jade Bay, it is a crime. Really, please do something.

Steve Molski, no phone or address provided

Steve Molski, Terry's Mobilehome Park, Chula Vista. You know, over the last several months, several years, I've been listening to people in different parks and the problems they have. This is getting to be a travesty any way you look at it. If you take people who have lived in an area for

N-56 five, 10, 15, 20 years and all of a sudden you kick them out, they don't have any place to go. Isn't there a possible way that you could put off implementing the EIR as regards to the mobilehome parks in Chula Vista? Get them incorporated in little at a time. When the City gets more money, which they say they're close to being broke now, when they get more money, they can buy these parks and then sell them back to the residents and get later model mobilehomes in there. They won't become a slum, they'll be an asset and the people will continue to have a place to live of their choice, not being tossed out on the street. Please, take that in consideration. The EIR is not a cure all, it is an enhancement of an area in which you live and I'm sure everybody is in for that same situation. While I'm here, I know I've mentioned this before, could you lengthen these doggone speaking gizmos here at least another foot or 12 inches because I'm six feet, I've got to bend over and the little woman, five feet, she can't reach it either. It won't cost that much and when someone looks that way, you can still hear them, they look that way, you can hear them. But if I start talking over here, you can't hear me on the mike, can you? Please, lengthen them all, it won't hurt. Thank you.

Jose Cortez

N-57 My name is Jose Cortez, I'm a landowner on 311 to 325 G Street. I want to thank City staff for their Urban Core EIR. I have thoroughly reviewed that, I think they are doing a wonderful job. I think the City is going through a big change. There is a lot of people coming into the City, there's going to be an increase in population and I think the redevelopment of the west side, being a native Chula Vistan and growing up in Chula Vista all my life, I think you guys are doing a wonderful job. I think you should continue to go forward with the EIR. I thoroughly support it and would like to include my property into the V-III area to build more housing that will benefit the people that are moving in and maybe the people with concerns or that will be displaced. Thank you very much.

William Cox, resident of Jade Bay Mobilehome Park; 691-7640

N-58 Yeah, I'm William Cox, I live at Jade Bay. They talk about affordable housing but San Diego just built some, they can't even afford to get in it. These people that was run out down there, they're talking about \$1,200-\$1,300 a month and a lot of these ladies here are on their minimum social security and that's all the income they got. They got to pay for their medicine. OK, the last thing I got to say and we're full of veterans in there. We fought for you guys, now its time you fight for us in there. Help us out. That's it.

Response to Letter N
Chula Vista Redevelopment Corporation
Close of Public Review Comments

- N-1** This comment expresses concern that future development in the UCSP area may result in the closure of existing mobile home parks and the displacement of mobile home park residents, who may be unable to find affordable replacement housing.

The UCSP does not require the closure of mobile home parks. Any redevelopment of these areas would be based on private market decisions of the individual property owners. The closure of mobile home parks is regulated by state law, specifically Government Code Section 65863.7 - Closure procedures; and Civil Code 798.56 - Tenancy Law, and by local ordinance Chula Vista Municipal Code 9.40.030. These procedures include noticing requirements, a relocation plan and relocation assistance. The relocation assistance identified in the CVMC includes assistance to low- and moderate- income mobile home occupants in the form of payment by the park owner of 75 percent, up to a maximum of \$3,000, of the cost of relocating the mobile home or trailer to another mobile home or trailer park within 100 miles. Alternatively, if the coach is determined to be not relocatable due to age and/or condition, the park owner must purchase those homes of low- and moderate-income mobile home or trailer owner/occupants at standard insurance replacement value. In addition, the park owner must show that displaced residents have been provided right of first refusal to purchase, lease or rent any new dwelling units which may be built on the subject property.

It should also be noted that in August 2006, staff provided an information memorandum to the City Council that recommends that the five sites currently zoned Mobile Home Parks (MHP) not be considered for rezoning at this time. This comment will be communicated to the City Council for consideration when it makes its decision whether or not to approve the proposed project. Although this comment does not raise an environmental issue concerning the adequacy of the DEIR, it expresses concern regarding affordable housing. Please see responses to Comments E-3 through E-6, H-13, I-11 through I-16, J-26 through J-30.

- N-2** Please see response to Comment N-1.
- N-3** Please see response to Comment N-1.
- N-4** The population estimate is derived from the California Department of Finance January 1, 2004 estimate for the City of Chula Vista and 2000 Census for unincorporated area. Also, please refer to the City's General Plan Section 4.10

Projected Population and the description for high residential and urban core residential land use categories.

- N-5** 2001 model volumes were used because nothing in the SANDAG model had changed and so it was unnecessary to re-run the model. The horizon year 2030 and all of its assumptions remained the same between the General Plan model run in 2001 and the Urban Core traffic study that used the same information. Chula Vista and SANDAG conducted extensive model calibration efforts prior to the completion of those model runs. The City of Chula Vista has worked closely with SANDAG to incorporate the most up-to-date land use assumptions for other adjacent jurisdictions and the region as a whole. The cumulative traffic analysis conducted for the study employed the regional traffic database and modeling employed by SANDAG. As such, it included the projected growth for the region, including both growth in regional trips and anticipated expansion of the circulation system. Regional transportation infrastructure was modeled using SANDAG's "reasonably expected" Mobility 2030 assumptions. The modeling effort for this project, which has been developed in a 5-year process, provides a reasonable estimate of future patterns.
- N-6** The UCSP DEIR is not recommending to re-write the Municipal Code as stated in this comment. The Growth Management Oversight Commission (GMOC) thresholds for traffic, referred to in the comment, is a different threshold than was used for the CEQA analysis. The CEQA threshold is based on long-term traffic assessments versus the GMOC threshold which assesses near term traffic impacts. As stated in Section 5.8 of the EIR and further described in Chapter 5 of the 2005 General Plan, long-term forecasts are utilized for determining theoretical traffic impacts in the distant future, and are typically applied in analyzing timeframes 15 years or more into the future, and/or at build-out of an area when all land use capacity is assumed to be developed. These forecasts are very general and conservative in nature, given that they look so far into the future, and are unable to address details such as intersection configurations, signal timing, another particular roadway characteristics that may exist in the future. The UCSP conducted a mid term horizon analysis to determine future year travel volumes on various roadway segments on a 24-hour basis. While these analyses employ the V/C methodology mentioned above, they also assess intersection performance within the approved study area. Turning movements at intersections are manually derived and are based on existing turn proportions, when applicable, or are logically assumed for not-yet-existent intersections using similar examples. Under the near term, the City's Traffic Monitoring Program (TMP) monitors the actual performance of the street system by conducting roadway segment travel time studies annually in accordance with the City's Growth Management program and Traffic Threshold Standards. The standards generally require that arterial roadway segments throughout the City maintain

operating conditions of LOS C or better, with the exception that LOS D may occur for not more than two hours per day, typically in the peak travel periods. This periodic review of roadway operations and volume levels also provides the opportunity to consider geometric modifications that may provide additional capacity necessary to maintain an acceptable LOS. Results from the TMP can also be used to evaluate potential roadway segment performance under near-term conditions (Years 0-4), using the methodology of the most recent version of the Highway Capacity Manual, which determines segment LOS based on speed. This methodology is not applicable beyond a four-year horizon.

This comment states that the transportation section sets an inappropriate threshold for judging the significance of traffic impacts. The comment references the GMOC threshold for corridors of LOS C except for a period of no more than two hours during which LOS D can occur, with the inclusion of the proposed project. This is a corridor threshold used to evaluate specific projects. The existing performance standard of LOS C is not appropriate in more urbanized contexts, such as Chula Vista's Urban Core. Increasingly, communities such as Chula Vista are questioning the sustainability of maintaining automobile levels of service in "transit corridors" and "town centers," major centers of economic, social and transportation activity. The California legislature recently enacted SB 1636 to exempt automobile levels of service standards for Congestion Management Program systems in "infill opportunity zones," areas of concentrated development around transit centers. The Urban Core Circulation Element promotes the use of revised level of service standards for certain corridors and centers served by transit, alternative ways of measuring level of service for vehicles, and possibly establishing level of service criteria and performance measures for other modes of travel.

Finally, the use of a project-specific corridor analysis for the buildout of the Urban Core is speculative and, lacking project-specific detail, inappropriate. The GMOC threshold remains in effect for the evaluation of specific development projects. The two hours of Level of Service D threshold is still being maintained. The 2-hour Level of Service "D" limit can only be analyzed or determined by physically driving the roadway or corridor in question. Since it is impossible to conduct this type of roadway analysis under future buildout conditions, the peak hour turning movement analysis is the next best alternative.

- N-7** Responses to written comments are contained in response to Comments I-1 through I-16 above.
- N-8** Please see response to Comments I-1 through I-4.

- N-9** The response to this question regarding the parameters of the 2005 historical properties evaluation is provided in response to Comment I-1 through I-4 and L-3.
- N-10** Please see response to Comment I-6.
- N-11** This comment makes a recommendation regarding height limits along Third Avenue. See response to Comment I-7 through I-9.
- N-12** See responses to Comments I-7 through I-9.
- N-13** For responses to comments regarding housing and displacement, please see responses to Comments E-3 through E-6, H-13, I-11 through I-16, J-26 through J-30, and N-1.
- N-14** Please see responses to Comments E-3 through E-6, H-13, I-11 through I-16, J-26 through J-30, and N-1.
- N-15** This comment states the DEIR's conclusion that the displacement of people by future development would be a temporary impact has no factual basis. Please see responses to Comments E-3 through E-6, H-13, I-11 through I-16, J-26 through J-30 and N-1.
- N-16** This comment states the qualifications of the speaker and identifies the property owner she represents. Because the comment does not raise environmental issues, no further response is required.
- N-17** This comment states the speaker also will provide written comments. These comments are contained in Comment Letters G & H and the responses to the comments are contained in responses to Comments G-1 through G-11 and H-1 through H-39.
- N-18** Please see response to Comment H-4.
- N-19** Please see responses to Comments H-4, H-6 and H-7.
- N-20** Please see responses to Comments H-5 through H-7.
- N-21** Please see response to Comment H-8 and H-23 through H-27.
- N-22** For response to vibration comments, see responses to Comments H-22 through H-30.
- N-23** Please see response to Comments H-25 through H-30.

- N-24** For responses to comments regarding housing and displacement, please see responses to Comments E-3 through E-6, H-13, H-14, I-11 through I-16, J-26 through J-30, and N-1.
- N-25** This comment states the EIR did not adequately describe potential parking impacts or the significance threshold in the initial study. Please see responses to Comments G-1, G-2, G-10 and H-18.
- N-26** This comment states the speaker disagrees with the EIR's conclusion that land use compatibility impacts would be less than significant. A disagreement among experts regarding the significance of a potential impact does not mean the EIR is inadequate. Please see responses to Comments H-9 and H-10.
- N-27** This comment states the speaker disagrees with the EIR's conclusion regarding Alternatives.
- A disagreement among experts regarding the significance of a potential impact does not mean the EIR is inadequate. Please see responses to Comments H-37 through H-39.
- N-28** This comment requests a definition of "high density" as may be applied under the UCSP to the property now occupied by the Jade Bay mobile home park. High Residential (18.1 to 27 dwelling units/acre) designation is intended for multi-family units, such as apartment and condominium-type dwellings in multiple-story buildings. Further remarks raised in this comment revolve around the issue of the pending closure of the Jade Bay mobile home park and concerns regarding the increased density. This comment will be communicated to the City Council for consideration when it makes its decision whether or not to approve the proposed project. Although this comment does not raise an environmental issue concerning the adequacy of the DEIR, it expresses concern regarding affordable housing. Please see responses to Comments E-3 through E-6, H-13, I-11 through I-16, J-26 through J-30, and N-1.
- N-29** This comment will be communicated to the City Council for consideration when it makes its decision whether or not to approve the proposed project. Although this comment does not raise an environmental issue concerning the adequacy of the DEIR, it expresses concern regarding affordable housing. Please see responses to Comments E-3 through E-6, H-13, I-11 through I-16, J-26 through J-30, and N-1.
- N-30** Remarks raised in this comment revolve around the issue of the pending closure of the Jade Bay mobile home park and concerns regarding the loss of affordable housing. This comment will be communicated to the City Council for consideration when it makes its decision whether or not to approve the proposed

project. Although this comment does not raise an environmental issue concerning the adequacy of the DEIR, it expresses concern regarding affordable housing. Please see responses to Comments E-3 through E-6, H-13, I-11 through I-16, J-26 through J-30, and N-1.

N-31 Remarks raised in this comment revolve around the issue of the pending closure of the Jade Bay mobile home park and concerns regarding the loss of affordable housing. This comment will be communicated to the City Council for consideration when it makes its decision whether or not to approve the proposed project. Although this comment does not raise an environmental issue concerning the adequacy of the DEIR, it expresses concern regarding affordable housing. Please see responses to Comments E-3 through E-6, H-13, I-11 through I-16, J-26 through J-30, and N-1.

N-32 Remarks raised in this comment revolve around the issue of the pending closure of the Jade Bay mobile home park and concerns regarding the loss of affordable housing. This comment will be communicated to the City Council for consideration when it makes its decision whether or not to approve the proposed project. Although this comment does not raise an environmental issue concerning the adequacy of the DEIR, it expresses concern regarding affordable housing. Please see responses to Comments E-3 through E-6, H-13, I-11 through I-16, J-26 through J-30, and N-1.

N-33 This comment states the City should provide incentives for apartment and mobile home park owners to maintain or provide low income or affordable housing in the City.

This comment will be communicated to the City Council for consideration when it makes its decision whether or not to approve the proposed project. Although this comment does not raise an environmental issue concerning the adequacy of the DEIR, it expresses concern regarding affordable housing. Please see responses to Comments E-3 through E-6, H-13, I-11 through I-16, J-26 through J-30, and N-1.

N-34 This comment states the EIR should include a well-defined housing outline as to how relocation assistance will be provided by the City or developers for all tenants who will be affected by the proposed project. Please see responses to Comments E-3 through E-6, H-13, I-11 through I-16, J-26 through J-30, and N-1.

N-35 The Plan's potential impacts on parking and traffic are addressed in Section 5.8 of the DEIR. Mitigation Measures 5.8.5-1 through 5.8.5-5 have been established to resolve, to the extent feasible, impacts to roadway segments, intersections, and parking. Despite roadway improvements, traffic impacts would remain significant and unmitigated for one roadway segment and three intersections.

Please also see responses to Comments G-1 through G-11 and H-16 through H-18.

- N-36** This comment makes a recommendation regarding height limits along Third Avenue.

Please see responses to Comments I-7 through I-9.

- N-37** This comment states the biggest problem with redevelopment is gentrification which results in the displacement of existing residents. Please see responses to Comments E-3 through E-6, H-13, I-11 through I-16, J-26 through J-30, and N-1.

- N-38** This comment states the EIR should include discussions of the impact on humans and the community and not just the build environment. Please see responses to Comments E-3 through E-6, H-13, I-11 through I-16, J-26 through J-30, and N-1.

- N-39** It is acknowledged that Pamela Bensoussan's comments are on behalf of the Northwest Civic Association. No response is necessary.

- N-40** This comment states the EIR does not explain why only 50 historic properties were evaluated. Please see responses to Comments I-1 through I-4 and L-3.

- N-41** This comment states the EIR failed to identify the work done previously to survey historic properties were evaluated. Please see responses to Comments I-1 through I-4 and L-1 through L-7.

- N-42** This comment identifies specific historic properties that the speaker believes should have been discussed in the EIR. Please see responses to Comments I-1 through I-4 and L-1 through L-7.

- N-43** This comment states that the speaker was informed buildings listed in the 1985 survey would be added to the EIR. Please see response to Comments I-1 through I-4 and L-2.

- N-44** This comment regarding local significance criteria was responded to in Comment L-1. Please see response to Comment L-1.

- N-45** This comment states that Lisa Moctezuma represents the Third Avenue Village Association. No response is necessary.

- N-46** This comment requests an increase in the maximum height limit and the FAR in the V-1 and V-2 sub-district areas. This comment will be communicated to the City Council for consideration when it makes its decision whether or not to approve the proposed project. Because this comment does not raise an

environmental issue concerning the adequacy of the DEIR, no further response is required.

- N-47** This comment expresses the speaker's opinion that stepback and design guidelines for high quality design and materials are important to preserve the historic character of the Village.

This comment will be communicated to the City Council for consideration when it makes its decision whether or not to approve the proposed project. Because this comment does not raise an environmental issue concerning the adequacy of the DEIR, no further response is required. Please also see response to Comment I-5.

- N-48** This comment expresses concern that the urban parking standard requirement is low and may result in an undesirable parking shortage. Please see responses to Comments E-19, E-21, G-10 and H-18.

- N-49** This comment states the speaker represents the Crossroads II. No response is necessary.

- N-50** This comment states it is inappropriate or illegal to have published the Notice of Preparation (NOP) a year or so before the actual plan document was available.

The NOP complied with the requirements of CEQA for publication. A copy of the NOP is attached as Appendix A to the EIR. Information regarding the publication of the NOP is available for review during normal business hours in the Office of the City Clerk, City of Chula Vista, 276 Fourth Avenue, Chula Vista CA, 91910. Please also see response to Comment H-5.

- N-51** This comment states the Cummings Initiative is not discussed in the EIR.

Please see responses to Comments I-6.

- N-52** This comment states the speaker's disagreement with the EIR's conclusion that the UCSP will not result in a significant impact related to the displacement of people that would require the construction of replacement housing elsewhere. Please see responses to Comments E-1 through E-6, H-13, I-11 through I-16, J-26 through J-30, and N-1.

- N-53** This comment states the speaker does not know whether the displacement of people as a result of redevelopment is a socio-economic issue or an environmental issue. Please see responses to Comments E-1 through E-6, H-13, I-11 through I-16, J-26 through J-30, and N-1.

- N-54** This comment states the issue of what happens to people displaced by redevelopment must be addressed somewhere. Please see responses to Comments E-1 through E-6, H-13, I-11 through I-16, J-26 through J-30, and N-1.
- N-55** This comment states that the owner of the Bayscene Mobile Home Park increased rent and it is happening at the Jade Bay Mobile Home Park as well. This comment will be communicated to the City Council for consideration when it makes its decision whether or not to approve the proposed project. Because this comment does not raise an environmental issue concerning the adequacy of the DEIR, no further response is required.
- N-56** This comment requests implementation of the EIR be delayed with respect to mobile home parks to give them time to get incorporated. This comment will be communicated to the City Council for consideration when it makes its decision whether or not to approve the proposed project. Because this comment does not raise an environmental issue concerning the adequacy of the DEIR, no further response is required. Please see also response to Comment N-1.
- N-57** This comment states the speaker's opinion that the City staff is doing a wonderful job and requests his property be included in the V-3 Subdistrict. This comment will be communicated to the City Council for consideration when it makes its decision whether or not to approve the proposed project. Because this comment does not raise an environmental issue concerning the adequacy of the DEIR, no further response is required.
- N-58** This comment states that affordable housing built in San Diego is so expensive that people on minimum social security cannot afford it. This comment will be communicated to the City Council for consideration when it makes its decision whether or not to approve the proposed project. Because this comment does not raise an environmental issue concerning the adequacy of the DEIR, no further response is required.

Final
Environmental Impact Report
for the
City of Chula Vista Urban Core Specific Plan
EIR #06-01
SCH #2005081121

Lead Agency

City of Chula Vista
Community Development Department
276 Fourth Avenue
Chula Vista, CA 91910

September 15, 2006

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A: Notice of Preparation and Responses
B: Cultural Resources Report for the Evaluation of the Historical and Architectural
Significance of 50 Properties within the Chula Vista Urban Core
C: Traffic Report
D: Noise Report
E: Air Quality Report for the Urban Core Specific Plan
F: Water Supply Assessment, City of Chula Vista Urban Core Specific Plan

1.0 Executive Summary

1.1 Introduction

This summary provides a brief synopsis of: (1) the proposed Urban Core Specific Plan, (2) the results of the environmental analysis contained within this Environmental Impact Report (EIR), (3) the alternatives to the proposed plan that were considered, and (4) the major areas of controversy and issues to be resolved by decision-makers. This summary does not contain the extensive background and analysis found in the document. Therefore, the reader should review the entire document to fully understand the project and its environmental consequences.

The purpose of this Program Environmental Impact Report (EIR) is to evaluate the environmental effects of the proposed City of Chula Vista Urban Core Specific Plan (UCSP). The UCSP includes proposed land use objectives, development regulations (zoning), and development design guidelines to implement the recently adopted General Plan Update (GPU) vision for the Chula Vista urban core. The UCSP land use development regulations and design guidelines would be used by the City to guide day-to-day decision-making regarding future proposals for new infill development and redevelopment of the urban core so that there is continuing progress towards attainment of plan objectives.

1.2 Project Description and Location

The subject of this Program EIR is a proposal to adopt and implement the UCSP which would govern the development and revitalization of the urban core of the City of Chula Vista. The City of Chula Vista is located in southern San Diego County, in the northwest portion of the City of Chula Vista, approximately ~~418~~ 448 miles north of the U.S.-Mexico border and 135 miles south of Los Angeles. The urban core of Chula Vista encompasses approximately 1,700 acres of the traditional downtown area east of I-5, west of Del Mar Avenue, north of L Street, and south of C Street. Within this larger area is a smaller 690-gross-acre area, which was determined to be most in need of redevelopment due to conditions of blight and underutilization. This smaller area comprises the "Subdistricts Area" of the UCSP and is the focus of all the regulatory land use provisions of the UCSP. The new zoning, development standards, and design guidelines proposed in the UCSP will apply only to the Subdistricts Area of the UCSP. Existing zoning and land use regulations will not be changed in the remaining portion of the UCSP study area outside the Subdistricts Area. The remaining portion of the UCSP study area outside the Subdistricts Area consists of stable residential neighborhoods not expected to transition within the planning horizon of the UCSP, were not proposed for

change under the adopted GPU, and were thus excluded from the regulatory provisions of the proposed UCSP.

The proposed UCSP would refine and implement the vision for downtown Chula Vista expressed in the City's GPU (2005). As a comprehensive, city-wide document, the GPU's goals, objectives and policies are necessarily general. The proposed UCSP would fulfill the role of providing detailed neighborhood-specific land use and development regulations (zoning), development design guidelines, and numerous other mobility and public realm guidelines, incentives and programs to revitalize the urban core in accord with the general goals stated in the GPU. The UCSP would additionally serve as the basis for a variety of other actions, such as parkland acquisitions and transportation improvements.

Under the proposed UCSP, the urban core at buildout would consist of an integrated and connected network of three distinct neighborhoods and districts, including the Village, Urban Core and Corridors districts. (For planning purposes each of these three districts are divided into a total of 26 subdistricts). Each district would contain a mix of primarily low- to mid-rise (45 to 84 feet in height) high-density commercial, office, and residential uses and various public amenities such as improved pedestrian streetscapes, bicycle and transit facilities, public art, and parks, plazas and paseos. Two high-rise (up to 210 feet in height) Transit Focus Areas would be permitted in the areas surrounding the existing E and H Street trolley stations.

Adoption of the proposed UCSP would replace existing Municipal Code - Zoning for the Subdistricts Area with new zoning that permits increased number of buildings, with increased building heights and mass. This intensification of land use in the Subdistricts Area is planned to accommodate GPU-projected resident and employment populations. Ultimate buildout of the UCSP would allow 7,100 net new residential units over the existing 3,700 for a total of up to 10,800 dwelling units by year 2030. Commercial retail square footage would increase by up to 1 million square feet over the existing 3 million square feet for a total of up to 4 million square feet by 2030. Commercial office space would increase by up to 1.3 million square feet over the existing 2.4 million square feet for a total of up to 3.7 million square feet by 2030. In addition, up to 1.3 million square feet of new commercial visitor-serving uses would be allowed in the Subdistricts Area by 2030.

The UCSP land use regulations would supersede existing Municipal Code – Zoning as well as the land use guidelines of the existing redevelopment plan areas that overlap the UCSP Subdistricts Area. Specifically, the Town Centre I Redevelopment Plan would be amended for consistency with the UCSP; the Town Centre I Land Use Policy would be replaced with the UCSP Land Use Matrix and the Town Centre I Design Manual would be repealed to defer to the UCSP design guidelines.

1.3 Environmental Analysis

Section 21002 of CEQA requires that an environmental impact report identify the significant effects of a project on the environment and provide measures or alternatives that can mitigate or avoid those effects. This Program EIR contains an environmental analysis of the potential impacts associated with implementing the proposed UCSP. The major issues that are addressed in this Program EIR were determined to be potentially significant based on review by the City of Chula Vista Community Development Department and public comment received on the Notice of Preparation. The issues include land use, landform alteration and visual quality, cultural resources, geology and soils, paleontological resources, population and housing, hydrology and water quality, traffic, circulation and access, noise, air quality, public services, public utilities, and public health hazards. The impact analyses for each of these issues are included in Chapter 5.0. Chapter 9.0 of this Program EIR summarizes the potential environmental impacts that were not considered significant, consisting of biological, mineral, and agricultural resources.

Table 1-1, located at the end of this section, summarizes the potentially significant environmental impacts and proposed mitigation measures by major issue, as analyzed in Chapters 5.0 and 6.0 of this Program EIR. The last column of this table indicates whether the impact would be reduced to below a level of significance after implementation of proposed mitigation measures.

This Program EIR incorporates by reference previous environmental documents covering environmental issues relevant to the approval of the UCSP. The documents used during the preparation of this program EIR are noted in the text, where applicable, and are additionally listed in Chapter 11.0, References Cited, of this Program EIR. The documents are available for review in their entirety at the City of Chula Vista Planning and Building Department, 276 Fourth Avenue and the Chula Vista Civic Center Library at 365 F Street in the City of Chula Vista. Selected documents are additionally available for review on the City of Chula Vista's website documents page at www.ci.chula-vista.ca.us.

1.4 Project Alternatives

Alternatives to the proposed project are evaluated in Chapter 10.0 of this EIR in terms of their ability to meet the primary objectives of the proposed project and eliminate or further reduce identified significant environmental effects. The alternatives considered are the No Project Alternative, the Reduced Project Alternative, and the Automobile Priority Alternative.

The No Project Alternative would continue to implement the existing Municipal Code - Zoning based on the former General Plan (1989). The Reduced Project Alternative would reduce development intensity by 25 percent throughout the UCSP Subdistricts Area compared to the proposed UCSP. The Automobile Priority Alternative would reprioritize proposed transportation improvement to maximize vehicle flow on area roadways and at area intersections. A comparative matrix of each of these alternatives is provided in Table 1-2, located at the end of this section.

1.5 Areas of Controversy and Issues to be Resolved

In accordance with the requirements of Section 15123 (b) (2 and 3) of the California Environmental Quality Act (CEQA) Guidelines, this section identifies the potential areas of controversy as well as any issues which will likely need to be resolved by decision-makers in relationship to the environmental effects of the proposed UCSP.

In the course of public meetings concerning the proposed UCSP, local citizens and organization have expressed concern regarding the following major environmental issues.

1.5.1 Land Use/Community Character

Concern has been expressed by residents and surrounding neighborhoods regarding potential land use compatibility issues related to community and visual character, noise, and air quality. As discussed in Chapters 5.1 and 5.2 of this EIR, and summarized in Table 1-1, no significant impacts with respect to land use compatibility community and visual character are anticipated due to harmonious land use designations and adequate vertical or horizontal separation between proposed high-density mid and high-rise uses and neighboring low-rise and/or single family residential uses. As discussed in Chapter 5.2 of this EIR, and summarized in Table 1-1, potentially significant impacts with respect to visual character would be avoided through adherence of future projects to the development regulations and design guidelines of the UCSP. Relevant UCSP development regulations and design guidelines provide setbacks, setbacks, screening, landscaping, building design and other measures to avoid or minimize adjacency issues such as architectural mass and form, aesthetics, solar access, ventilation, and other effects. The proposed UCSP permits primarily commercial and residential land uses, which are similar to and compatible with existing zoning and occupied land uses. The UCSP regulatory provisions would not permit new uses within the Subdistricts Area which may create substantial compatibility issues, and would not encourage the development of new uses surrounding the Subdistricts Area. The area surrounding the Subdistricts Area would remain subject to existing Municipal Code zoning provisions which allow low-rise residential uses in areas that are currently occupied by same.

The proposed UCSP allows for substantial intensification of existing land uses within the UCSP Subdistricts Area to accommodate a projected three-fold increase in population in the area. The existing community and visual character of the area could potentially change from existing conditions of mostly low-rise (up to 48 feet in height) single-use commercial blocks surrounded by multi-family residential blocks, to a future mix of low-rise (up to 45 feet in height) and mid-rise (up to 84 feet in height) mixed-use commercial/office and residential blocks, with high-rise structures (up to 210 feet in height) allowed in the areas surrounding the existing E Street and H Street trolley stations. Existing visual character, blue sky views, solar access, ventilation, and glare/lighting conditions would be affected by this intensification in land use. While these physical changes are considered substantial, they are not considered to be adverse, given adherence of individual future projects to UCSP development regulations and design guidelines as required by Mitigation Measures 5.2.5-1 and 5.2.5-2. Provisions in the UCSP such as the provision of new mixed-use zoning classifications, paseos to provide walkable access to neighborhoods, reconnection of the street grid pattern in areas that have been previously disrupted, and linking of bikeways, sidewalks and urban plazas throughout the urban core, additionally serve to integrate the community rather than to physically divide it. The principles of smart growth, upon which the UCSP was developed, emphasize innovative mobility and land use planning tools to create a vibrant city center that is a combination employment/residential/commercial area with transit, recreational and other quality of life amenities that serve to create cohesive neighborhoods. While providing updated infrastructure and community amenities, smart growth principles also strive to preserve and enhance existing community character by building upon existing design themes and incorporating local culturally significant resources into plan design.

As discussed in Chapters 5.9 and 5.10 of this Program EIR, ~~significant impacts on surrounding neighborhoods are not anticipated with respect to noise and air quality; however,~~ significant noise and air quality impacts are anticipated for future uses within the Subdistricts Area. Increased vehicle traffic on area roadways would generate future noise levels adjacent to the roadways in excess of acceptable standards for noise sensitive uses such as residential units and outdoor recreation. Mitigation measures are provided in this Program EIR to ensure that future development within the UCSP Subdistricts Area reduces noise impacts to below significance. Prior to issuance of an Urban Core Development Permit or other discretionary permit, all future projects within the Subdistricts Area with the potential to be exposed to noise in excess of specified limits shall be required to complete applicable exterior and interior noise analyses and demonstrate to the satisfaction of the City Community Development Director that project-specific design includes measures to reduce any noise impacts to below a level of significance.

Due to the San Diego Air Basin being in non-attainment for ozone and particulates, future air quality emissions, despite being projected to be lower than current emissions

due to improved energy and transportation efficiencies, would be cumulatively significant. In addition, potentially significant air quality impacts would occur for future residents within 500 feet of Interstate 5 along the western edge of the Subdistricts Area due to projected diesel vehicle particulate (PM₁₀) emissions emanating from the freeway. The UCSP contains special design guidelines for areas adjacent to Interstate 5 that would lessen impacts; however impacts would remain cumulatively significant, avoidable only by source-control measures which are not the jurisdiction of the City of Chula Vista. Implementation of the proposed UCSP would also pose significant air quality impacts, as defined by CEQA, through inconsistency with the adopted Regional Air Quality Standards (RAQS) and State Implementation Plan (SIP). The goals and objectives of the SIP and RAQS were based upon the former General Plan designated land uses. The recently adopted GPU land uses are inconsistent with the former General Plan, and thus the SIP and RAQS. Because the proposed UCSP conforms to the adopted GPU, the UCSP is in significant conflict with an applicable air quality plan. The only measure that can lesson this impact is revision of the RAQS based on the recently adopted GPU. This effort is the responsibility of SANDAG and San Diego APCD and is outside the jurisdiction of the City of Chula Vista.

1.5.2 Traffic, Circulation, and Parking

Surrounding neighborhoods and current residents/users of the urban core have expressed a concern that traffic and parking may increase in their neighborhoods due to the increased development potential under the proposed UCSP. As discussed in Chapter 5.8, traffic volumes on area roadways are anticipated to substantially increase by 2030. Roadway and intersection improvements are incorporated as mitigation measures in the proposed UCSP to avoid future impacts to 19 intersections and 2 roadway segments. However, despite these improvements, three intersections and one roadway segment would remain at unacceptable levels of service. The intersections include Broadway at H Street and Third Avenue and J Street within the Subdistricts Area, and Hilltop Drive and H Street within the study area. The affected street segment is Third Avenue between E and G Streets. Due to right-of-way constraints and conflict with the guiding principle of the UCSP to encourage modes of transport other than automobile, these impacts remain significant and unmitigated. The smart growth principles of the GPU are reflected in the change in mobility emphasis in the UCSP which places more emphasis on multi-modal opportunities including pedestrians, bicycling, public transit and less emphasis on the automobile. By design, the LOS for the indicated roadway segments and intersection would decline due to improvement in the streetscape to benefit pedestrians, cyclists and public transit users.

The UCSP development regulations include parking requirements for residential, guest and non-residential uses. A projected total of 18,560 parking spaces would be required to serve future development of the proposed UCSP at buildout. While the majority of new development will provide on-site parking, there are specific locations such as within

the Village District and transit focus areas that allow some parking needs to be met off-site and/or through alternative means such as in-lieu fees and shared parking arrangements. A number of other parking improvement strategies are included in the UCSP such as parking buffers, parking districts and parking structures. Potential significant impacts to parking would be reduced to below significance by the incorporation of these development regulations and design guidelines into subsequent development projects, as required as part of the UCSP design review process. Parking improvements will either be made on-site (i.e., where required of subsequent development projects), or off-site (i.e., in coordination with the City's Parking District or in Lieu Fee program). Given these UCSP provisions, future parking conditions were considered to be not significant.

1.5.3 Housing

The issue of the effect of the proposed UCSP on housing has been raised with respect to the effect of urban core redevelopment on existing affordable housing in areas surrounding the commercial corridors and in surrounding neighborhoods. If property values increase in the urban core, property values in surrounding neighborhoods would likely increase, thereby increasing the cost of housing and rent. These concerns fall into the general category of socio-economic considerations and are not required by CEQA to be addressed in an EIR. Section 15131 (a) of the CEQA Guidelines indicates that "economic or social effects of a projects shall not be treated as significant effects on the environment." Affordable housing issues would only be addressed if they result in a physical change in the environment.

There are no issues related to affordability that would translate into unique physical changes in the environment. Nonetheless, given that Redevelopment Plans overlay the majority (approximately 70 percent) of the Subdistricts Area, provisions of California Redevelopment Law will continue to direct funding to low and moderate income housing. Twenty percent of funds generated through tax increment financing (fees collected within a redevelopment plan area) are required to be set aside for affordable housing. Due to future revitalized conditions within the Subdistricts Area and overlapping redevelopment plans, it is anticipated that more tax increment financing funds would be generated and made available to serve affordable housing needs.

The physical affects of construction of new housing are considered in this Program EIR in Chapter 5.6, Population and Housing. Development under the UCSP would result in a substantial increase in the population of Chula Vista because it would accommodate growth that is planned to occur locally. The UCSP would have a beneficial impact on planned population and housing through the implementation of "smart growth" principles, consistent with the GPU, by directing higher density and intensity development in areas in and around transit and commercial corridors, and on vacant and underutilized land, and would provide housing to help meet the regional housing needs as approved by the

State Department of HCD and SANDAG. The development regulations and design guidelines of the UCSP are expected to protect existing, stable residential neighborhoods, reduce urban sprawl, and reduce the direct and indirect impacts of increased population and housing to below a level of significance. Development in accordance with the proposed UCSP would not displace substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere because the overall number of housing units allowed by the UCSP would be sufficient within the area to accommodate the affected population. The UCSP proposes a net increase of up to 7,100 residential units over a 25-year period. During redevelopment of new residential units, existing occupants would be temporarily displaced. These short term effects were considered in this Program EIR to be not significant due to the continuous production of additional housing within the urban core and throughout Chula Vista which would ensure the provision of housing within the same area and would not require it elsewhere in San Diego county or neighboring counties.

**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS**

LAND USE	Impact	Mitigation	Proposed UCSP		
			SBM	MM	SAM
<p>Local Plans Conformance. The proposed UCSP has been prepared pursuant to the recently adopted City of Chula Vista General Plan Update (GPU) as an implementing regulatory document; and serves as the primary source for policies, guidelines and regulations that implement the community's vision for the urban core.</p> <p>The adopted GPU largely focused on the revitalization and redevelopment of western Chula Vista in accordance with smart growth principles. The broad objectives and policies described in the GPU have been refined and described at the neighborhood level in the UCSP. Chapter 11 (General Plan Implementation) of the GPU identifies the UCSP as a required element to implement the new land use designations, objectives, and policies identified for the urban core and specifically referenced in the Northwest Planning Area of the GPU. The proposed UCSP is thus consistent with the adopted GPU.</p> <p>The UCSP is also consistent with other local plans and policies that govern land use in the Chula Vista urban core, including the Merged Plan Redevelopment Plan, the Broadway Revitalization Strategy, and the Chula Vista Historic Preservation Strategic Plan.</p>	<p>No mitigation required.</p>	<p>Not Significant</p>	<p>None Required</p>	<p>Not Significant</p>	

SBM = Significance before Mitigation

MM = Mitigation Measures

SAM = Significance after Mitigation

**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>LAND USE (cont.)</p> <p>Implementation of the proposed UCSP would not affect the boundaries or authorities of the Merged Plan Redevelopment Plan (which overlaps a large portion of the UCSP Subdistricts Area) and provides additional provisions to meet Redevelopment Plan goals to revitalize and redevelop the blighted areas of the urban core. The UCSP is consistent with the Broadway Revitalization strategies for reversing deteriorating conditions along the auto-oriented Broadway strip and reforming the area into a commercially viable and visually pleasing environment. The UCSP also implements the strategies of the Historic Preservation Strategic Plan which identified several measures the City should undertake in order to more effectively achieve its historic preservation goals. Measures included in the Strategic Plan that are reflected in the proposed UCSP include the integration of historic preservation goals into land use policies, inventory of historic resources, and provision of incentives for historic preservation.</p>				

SBM = Significance before Mitigation

MM = Mitigation Measures

SAM = Significance after Mitigation

**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>LAND USE (cont.)</p> <p>Local Zoning Conformance. The proposed UCSP provides new zoning in conformance with the land use designations of the recently adopted GPU. The GPU identified the need to update the existing adopted Municipal Code zoning to conform to the GPU. The existing Municipal Code zoning for the urban core was established 30 years ago and is presently out of conformance with the GPU, and hence the proposed UCSP.</p> <p>In order to comply with State law and bring the zoning into conformance with the GPU, the UCSP proposes new zoning for the UCSP Subdistricts Area. The new zoning includes provisions for land uses, building intensity, form, mass, and height as recommended in the GPU. The stable neighborhoods that comprise the Study Area outside of the Subdistricts Area would not be subject to this new zoning and would continue to be governed by the existing Municipal Code zoning. Because the UCSP proposes to provide new zoning as a replacement for the existing Municipal Code zoning for the Subdistricts Area, as a required implementing action of the GPU, there would be no conflict.</p>	No mitigation required.	Not Significant	None Required	Not Significant

SBM = Significance before Mitigation

MM = Mitigation Measures

SAM = Significance after Mitigation

**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
LAND USE (cont.)				
Regional Plans Conformance. The proposed UCSP objectives and regulatory provisions generally conform to the various plans and policies developed to coordinate growth within the region. This includes the joint planning efforts of the City of Chula Vista and the County of San Diego for SANDAG's RCP, RTP and CMP which promote smart growth principles; the Regional Housing Program; and MTDB's Transit First studies. The UCSP is also consistent with the intent and goals of the SIP and RWQCB (discussed in the Air Quality and Hydrology and Water Quality summaries below). Therefore, the proposed UCSP would not result in a significant impact to regional plans.	No mitigation required.	Not Significant	None Required	Not Significant
The proposed discretionary actions include amendment of the Town Centre I Redevelopment Plan to bring it into conformance with the GPU and UCSP. The action covered by this EIR addresses the deletion of the Town Centre I Redevelopment Plan land use regulations and repeal of its Land Use Policy and Design Manual. This action will bring the adopted redevelopment plan into consistency with the UCSP, thereby eliminating planning conflict between the two plans.	No mitigation required.	Not Significant	None Required	Not Significant

SBM = Significance before Mitigation

MM = Mitigation Measures

SAM = Significance after Mitigation

**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

LAND USE (cont.)	Impact	Mitigation	Proposed UCSP		
			SBM	MM	SAM
<p>Physically Divide a Community. The proposed UCSP would apply new zoning to the limited "Areas of Change" identified in the recently adopted GPU (and equal to the UCSP "Subdistricts Area") and would provide for the envisioned integration of existing neighborhoods while providing for new development along gateways and major transit corridors. The GPU EIR provided an evaluation of the community character impacts associated with the change in land use designations and concluded that the policies and objectives outlined in the GPU would limit impacts on community character, but were dependent on future zoning or specific plans. As an implementing document of the GPU, the UCSP would provide the intended development standards, design guidelines, program for urban amenities, and design review process which limit impacts on community character. In addition, many of the public realm elements identified in the UCSP Chapters V, Mobility, and Chapter VII, Public Realm Design Guidelines, such as provision of paseos to provide walkable access to neighborhoods, reconnecting the street grid pattern in areas that have been previously disrupted, and linking bikeways, sidewalks and urban plazas throughout the urban core, serve to integrate the community rather than to physically divide it.</p>	No mitigation required.	Not Significant	None Required	Not Significant	

SBM = Significance before Mitigation

MM = Mitigation Measures

SAM = Significance after Mitigation

**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>LAND USE (cont.)</p> <p>Community Character. Implementation of the proposed UCSP would result in the adoption of new zoning for the Subdistricts Area which would permit the development or redevelopment of up to 10,800 (or 7,100 net new) dwelling units, 4 million or (1 million net new) square feet of commercial retail space, 3.7 million (or 1.3 million net new) square feet of commercial office space, and 1.3 million square feet of net new commercial visitor-serving space upon buildout of the plan over the next 25 years.</p> <p>The UCSP proposes new mixed-use zoning classifications to replace existing single-use zoning classifications, in order to allow integration of residential and commercial uses in the same structure and neighborhood. These new zoning regulations and the development design guidelines of the UCSP aim to implement a vision for the Subdistricts Area that is substantially different in intensity and character than existing community character. Allowable building heights and floor area ratio (FAR) provided in the UCSP would allow taller and more massive structures to be built. Low-rise (up to 45 feet in height) residential and commercial single-use structures would be potentially replaced with mid-rise (45 feet to 84 feet in height) mixed-use (commercial/office/residential) structures; and in some cases high-rise structures up to 120 or 210 feet in height (only in the Subdistricts UC-12, UC-15 and UC-18).</p>	<p>No mitigation required.</p>	<p>Not Significant</p>	<p>None Required</p>	<p>Not Significant</p>

SBM = Significance before Mitigation

MM = Mitigation Measures

SAM = Significance after Mitigation

**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>LAND USE (cont.)</p> <p>The effects of this land use intensification would not necessarily be adverse, and in accordance with CEQA Guidelines Section 15382, it is not enough to conclude significance based on substantial change, but significance must be based upon the physical change being substantial and adverse. The built environment permitted through the UCSP land use and development regulations and design guidelines is one that builds upon the principles of smart growth and new urbanism. These principles emphasize innovative mobility and land use planning tools to create vibrant city centers that are a combination employment/residential/commercial area with transit, recreational and other quality of life amenities that serve to create cohesive neighborhoods. While providing updated infrastructure and community amenities, smart growth principles also strive to preserve and enhance existing community character by building upon existing design themes and incorporating local culturally significant resources into plan design.</p>				

SBM = Significance before Mitigation

MM = Mitigation Measures

SAM = Significance after Mitigation

**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>LAND USE (cont.)</p> <p>The UCSP contains specific provisions to address issues of community character and adjacent land uses in its Neighborhood Transition Combining Districts (NTCDs) and Transit Focus Areas (TFAs), as well as in its special regulations and design guidelines for mixed-use development. The NTCDs apply to Subdistricts Area parcels adjacent to existing R-1 and R-2 residentially-zoned areas and provide additional setback, stepback, landscaping, lighting, fencing, screening and building design requirements to ensure that the character of redevelopment within the UCSP Subdistricts Area will be compatible with and will complement adjacent surrounding residential areas. The TFAs are centered around transit facilities and additionally provide requirements to conduct light and solar access, shadowing, and ventilation studies to assess effects on adjacent buildings and areas.</p>				

SBM = Significance before Mitigation

MM = Mitigation Measures

SAM = Significance after Mitigation

**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>LAND USE (cont.)</p> <p>Land Use Compatibility. Provisions in the UCSP such as siting requirements, height limitations, setback and stepback requirements of the NTCs and TFAs, and design guidelines for new development and redevelopment within the Subdistricts Area, would ensure that new development would not result in construction of structures that are incompatible with existing and/or adjacent structures. In addition, the UCSP allows only multi-family residential and commercial land uses to occupy the Subdistricts. No industrial uses are permitted within the Subdistricts, except some categories of light industry upon approval of a Conditional Use Permit. Residential and commercial land uses are generally considered compatible. Due to the form-based approach of the UCSP land use and development regulations, and the market-driven, incremental nature of anticipated development, it is not possible to predict actual land use configuration in terms of adjacency. However, given the general compatibility of commercial land use with multi-family residential use, and the design guidelines and transitions district, it is concluded that land uses allowed in the UCSP will be generally compatible with adjacent uses.</p> <p>Land use compatibility issues related to noise, light/glare, shading/solar access, traffic, and public safety are addressed in the following respective summaries.</p>	No mitigation required.	Not Significant	None Required	Not Significant

SBM = Significance before Mitigation

MM = Mitigation Measures

SAM = Significance after Mitigation

**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>LANDFORM/AESTHETICS</p> <p>Scenic Resources and Vistas. The UCSP area does not contain any significant visual landform features such as rock outcroppings, trees, or mountains, nor any designated scenic roadways. A village archway to the traditional downtown area at H Street and Third Avenue comprises the only existing scenic resource within the UCSP area.</p> <p>In accordance with the GPU (Objective LUT 9), the proposed UCSP has identified four Primary Gateways within the UCSP Subdistricts Area. Additionally the UCSP proposes two Secondary Gateways. Primary and secondary gateways are scenic features which serve to facilitate movement and provide access to the urban core. Because there are no scenic vistas or designated scenic roadways within the UCSP boundary, and the UCSP establishes design standards to enhance the view corridors at the primary and secondary gateways while preserving and complementing the existing Third Avenue archway, no significant impacts to scenic vistas or scenic resources would result from implementation of the UCSP.</p>	No mitigation required.	Not Significant	None Required	Not Significant

SBM = Significance before Mitigation

MM = Mitigation Measures

SAM = Significance after Mitigation

**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	
<p>LANDFORM/AESTHETICS (cont.)</p> <p>Aesthetics/Visual Character. The proposed UCSP allows for substantial intensification of existing land use and resulting urban visual character, through greater building heights and mass, to accommodate the three-fold increase in population projected for the urban core by the year 2030. Per the regulations and design guidelines of the UCSP, redevelopment and new development within the UCSP Subdistricts Area would change the existing visual character from mostly low-rise (up to 48 feet in height) single-use commercial blocks surrounded by multi-family residential blocks, to a mix of low-rise (up to 45 feet in height) and mid-rise (up to 84 feet in height) mixed-use commercial/office and residential blocks, with high-rise structures (up to 210 feet in height) allowed in the areas surrounding the existing E Street and H Street trolley stations. Existing visual character, blue sky views, solar access, ventilation, and glare/lighting conditions would be affected by this intensification in land use. While these changes are considered substantial, they are not considered to be adverse, given adherence to UCSP development regulations and design guidelines.</p> <p>The proposed UCSP contains the urban development regulations and design guidelines required in the GPU to achieve a high quality pedestrian-scaled environment consistent with policies in the GPU for the urban core. All subsequent development projects in the UCSP Subdistricts Area will be required to comply with the UCSP</p>	<p>To ensure avoidance of potential visual character impacts, all subsequent development projects in the UCSP Subdistricts Area will be required to comply with relevant UCSP provisions, as follows:</p> <p>Mitigation Measure 5.2.5-1:</p> <p>All subsequent development projects in the UCSP Subdistricts Area shall comply with UCSP development regulations and design guidelines which are necessary to reduce or avoid potential impacts to landform alteration and visual quality (including blue sky views, solar access, and ventilation), and which may include but not be limited to the special development regulations for mixed-use projects (p. VI-44), the NTCD and TFA regulations (p. VI-40), and the siting and architectural design guidelines for each district (Chapter VII). Prior to approval of a subsequent development project, the Community Development Director or Planning and Building Director of the City shall identify the specific provisions of the UCSP which shall be included in the conditions of approval in order to avoid or to reduce potential impacts to below significance.</p>	Potentially Significant	5.2.5-1	Not Significant

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>LANDFORM/AESTHETICS (cont.)</p> <p>development regulations (UCSP, Chapter VI) and development design guidelines (UCSP, Chapter VII) and other relevant provisions of the UCSP, as part of the design review process, in order to avoid or reduce potential visual character impacts to a level below significance. Therefore, the proposed UCSP would not result in a significant impact to the prevailing aesthetic character of the site or surrounding area.</p>				

SBM = Significance before Mitigation

MM = Mitigation Measures

SAM = Significance after Mitigation

**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>LANDFORM/AESTHETICS (cont.)</p> <p>Light and Glare Effects. As described above under the Aesthetics/Visual Character summary, the proposed UCSP would allow for a substantial intensification of existing land uses through taller building heights and greater building massing. Light sensitive activities (e.g. sleeping) could potentially be adversely impacted by light or glare in excess of baseline conditions due to buildout of the UCSP and intensification of land use. However, various provisions in the UCSP development regulations and design guidelines (UCSP Chapters VI and VII) serve to control light and glare sources and ensure that light pollution and glare would be minimal. The special regulations for mixed-use projects require that all mixed-use projects "minimize the effects of any exterior noise, odors, glare, and other potentially significant effects" (UCSP, Chapter VI, Section H, p. VI-44). For each UCSP District, a set of private development and public realm design guidelines (UCSP, Chapter VIII) include lighting requirements to reduce glare, exposure or brightness, angle and depth of field, and duration. Many lighting sources are encouraged to be timed or motion-sensitized.</p> <p>All subsequent development projects in the UCSP Subdistricts Area will be required to comply with the UCSP development regulations (UCSP, Chapter VI) and development design guidelines (UCSP, Chapter VII) and other relevant provisions of the UCSP, as part of the design review process, in order to avoid or reduce potential light and glare impacts to a level below significance. Therefore, the proposed UCSP would not result in a significant impact to the prevailing light and glare conditions of the site or surrounding area.</p>	<p>To ensure avoidance of potential light and glare impacts, all subsequent development projects in the UCSP Subdistricts Area will be required to comply with relevant UCSP provisions, as follows:</p> <p>Mitigation Measure 5.2.5-2:</p> <p>All subsequent development projects in the UCSP Subdistricts Area shall comply with UCSP development regulations and design guidelines which are necessary to reduce or avoid potential adverse impacts to light or glare and which may include but not be limited to the provisions included in section 5.2.3.3 a through e of this EIR. Prior to approval of a subsequent development project, the Community Development Director or Planning and Building Director of the City shall identify the specific provisions of the UCSP which shall be included in the conditions of approval in order to avoid or to reduce potential light and glare impacts to below significance.</p>	Potentially Significant	5.2.5-2	Not Significant

SBM = Significance before Mitigation

MM = Mitigation Measures

SAM = Significance after Mitigation

**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>CULTURAL RESOURCES</p> <p><u>Architectural Resources.</u> So far, eleven buildings or sites within the UCSP Subdistricts Area have been locally are currently designated or <u>determined to be eligible to be designated as historically significant as defined in the CEQA Guidelines.</u> Six of the eleven sites are currently listed on the Chula Vista List of Historic Sites. The other five sites were determined by a focused survey to be eligible for local listing in September 2005. Without mitigation, demolition or substantial alteration of any of these eleven historic resources buildings as a result of future development in accordance with the proposed UCSP would comprise a significant historical architectural resources impact.</p> <p>The area around Third Avenue and F Street is considered the traditional heart of the City and includes important elements of the early residential and business activities of the City. The potential for the existence of other as yet unidentified historic properties is highly probable given significant in light of the number of older commercial and residential structures throughout the UCSP Subdistricts Area. If significant historic resources occur among these unidentified structures, their loss or substantial alteration would comprise a significant historical architectural resources impact. <u>Therefore, mitigation measures have been adopted to reduce the impact(s) to a level less than significant.</u></p> <p>Implementation of Mitigation Measures 5.3.5-1, 5.3.5-2 and 5.3.5-4 would reduce potential impacts to historic resources to below a level of significance. In some circumstances, the implementation of</p>	<p>Mitigation Measure 5.3.5-1: For a structure listed on, or eligible for listing on, the Chula Vista List of Historic Sites or State and Federal historic registers, the project applicant shall retain the structure in-place and maintain, repair, stabilize, rehabilitate, restore, preserve or reconstruct the structure in a manner consistent with the Secretary of the Interior's <i>Standards for the Treatment of Historic Properties</i> with <i>Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings</i> (1995), Weeks and Grimmer ("Secretary's Standards"). Prior to issuance of an Urban Core Development Permit (UCDP) or other discretionary permit, the project applicant shall prepare detailed construction plans under the supervision of a qualified architectural historian or historic architect for review and approval by the Community Development Director. The Community Development Director shall retain, at the project applicant's expense, a qualified historic architect to review the plans and to certify that the project will comply with the Secretary's Standards and would not result in the loss of the structure's listing, or eligibility for listing, on the City, State or Federal register of historic resources.</p>	Significant	5.3.5-1 through 5.3.5-4	Not Significant

SBM = Significance before Mitigation

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>CULTURAL RESOURCES (cont.)</p> <p>an historic resource, would not mitigate significant impacts to a point where clearly no significant effect on the environment would occur. In that event, a potential impact to historic resources may be significant and unavoidable.</p>	<p>Mitigation Measure 5.3.5-2: Where there is substantial evidence that it is not feasible for a structure listed on, or eligible for listing on the Chula Vista List of Historic Sites or State or Federal historic registers, to be retained in-place, the project applicant shall provide for relocation and maintenance, repair, stabilization, rehabilitation, restoration or preservation of the structure in a manner consistent with the Secretary of the Interior's <i>Standards for the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings</i> (1995), Weeks and Grimmer ("Secretary's Standards") at a new location subject to the approval of the City. Prior to issuance of an Urban Core Development Permit (UCDP) or other discretionary permit, the project applicant shall prepare detailed relocation plans under the supervision of a qualified architectural historian or historic architect for review and</p>			

SBM = Significance before Mitigation

MM = Mitigation Measures

SAM = Significance after Mitigation

**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
CULTURAL RESOURCES (cont.)				
	approval by the Community Development Director. The Community Development Director shall retain, at the project applicant's expense, a qualified historic architect to review the plans and to certify that the project will comply with the Secretary's Standards and would not result in the loss of the structure's listing, or eligibility for listing, on the City, State or Federal register of historic resources.			

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SAM = Significance after Mitigation

**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
CULTURAL RESOURCES (cont.)	<p>Mitigation Measure 5.3.5-3: Where there is substantial evidence, as determined by CEQA Guidelines Section 15064.5(b)(4), that it is not feasible for a structure listed on, or eligible for listing on, the Chula Vista List of Historic Sites or State or Federal historic registers to be retained in-place or to be relocated to another location satisfactory to the City, the project applicant shall: Provide for documentation of the historical structure before it is removed from the development site, including but not limited to photographic documentation of the exterior and interior of the structure, and "as built" drawings of the structure according to the standards of the Historic American Building Survey (HABS, Level I). Such historical documentation shall be provided to the CVRC or RCC, as applicable, before a demolition permit is issued by the City for the structure.</p>			

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SAM = Significance after Mitigation

**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
CULTURAL RESOURCES (cont.)	<p>Mitigation Measure 5.3.5-4: For those structures 45 years or older and not previously evaluated, a determination of historic significance shall be made based on the significance criteria in Section 5.3.2 (and repeated below) prior to the issuance of a demolition permit.</p> <p><u>A site or structure may be listed on the Chula Vista List of Historic Sites if it possesses integrity (of location, design, setting, materials, workmanship, feeling and association) and meets at least one of the following criteria:</u></p> <ul style="list-style-type: none"> • (A) Is associated with events that have made a significant contribution to the broad patterns of <u>California's history and cultural heritage at the local, regional, state, or national level;</u> • (B) Is associated with the lives of <u>significant persons important in our the past on a local, regional, state, or national level;</u> 			

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
CULTURAL RESOURCES (cont.)	<ul style="list-style-type: none"> • <u>(C)</u>-Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a <u>master-an important creative individual</u>, or possesses high artistic values; or • <u>(D)</u>-Has yielded, or may be likely to yield, information important in <u>history or prehistory or history.</u> <p>If a <u>resource is determined by the City to be historically significant pursuant to the above listed criteria</u>, Mitigation Measure 5.3.5-2, 5.3.5-3 or 5.3.5-4 shall be implemented as applicable.</p>			

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>CULTURAL RESOURCES (cont.)</p> <p>Archaeological Resources. The UCSP Subdistricts Area is mapped as having low sensitivity for the occurrence of archaeological resources. Although the likelihood of encountering significant archaeological resources and human remains is low, the potential does exist. In the unlikely event that prehistoric cultural materials are found during subsurface disturbance resulting from future developments, there would be a significant archaeological impact.</p>	<p>Mitigation Measure 5.3.5-5: The likelihood of encountering archaeological resources is low within the UCSP Subdistricts Area. The following mitigation shall only be applied to projects which involve subsurface excavation to the depth of greater than or equal to six feet, or for any project site that has not had substantial previous excavation. Prior to approval of any construction permits, including but not limited to, the first Grading Permit, Demolition Permit, and Urban Core Development Permit, the Community Development Director shall verify that the requirements for Archaeological Monitoring and Native American monitoring, if applicable, have been noted on the appropriate construction documents.</p> <ul style="list-style-type: none"> The applicant/developer shall submit documentation to the Community Development Director identifying the qualified Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, the areas to be monitored, and a construction schedule indicating when and where monitoring will occur. 	Significant	5.3.5-5	Not Significant

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
CULTURAL RESOURCES (cont.)	<ul style="list-style-type: none"> • During construction, the monitor shall be present full-time during soil remediation and grading/excavation/trenching activities which could result in impacts to archaeological resources, and shall document field activity and in the case of any discoveries. • In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the resident engineer or building inspector, as appropriate. The monitor shall immediately notify the PI (unless the Monitor is the PI) of the discovery and the PI and Native American representative, if applicable, shall evaluate the significance of the resource. 			

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
CULTURAL RESOURCES (cont.)	<ul style="list-style-type: none"> Once encountered, artifacts associated with an archaeological feature or deposit are required to be documented in place, analyzed in a laboratory setting and prepared for curation in accordance with CEQA provisions and local guidelines. If human remains are discovered, work shall halt in that area and the procedures set forth in the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken. 			

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

GEOLOGY/SOILS	Impact	Mitigation	Proposed UCSP		
			SBM	MM	SAM
<p>Geologic Hazards. The UCSP area is potentially subject to strong ground shaking by an earthquake along the active Rose Canyon fault zone, or other active faults in the region. The Subdistricts Area may additionally be subject to liquefaction along its western boundary. Compressible and expansive soils also have the potential to be encountered by future development throughout the Subdistricts Area. Buildout of the UCSP would result in an increase in housing, office space, retail space, and hotels that would be subject to these potentially significant seismic and soils hazards. Therefore, there would be a proportionate increase in personal and property damage as the population within the urban core increases.</p> <p>Implementation of project-specific mitigation measures would be required to reduce or avoid significant impacts resulting from groundshaking, liquefaction, and compressible and expansive soils.</p> <p>Construction on liquefiable soils could result in injuries or loss of property during ground shaking of sufficient magnitude and duration. Expansive soils within pavement, foundation, or slab subgrade could heave when wetted, resulting in cracking or failure of these development improvements. Development on compressible soils could potentially settle under increased load and damage structures, roads, and property.</p>	<p>Mitigation Measure 5.4.5-1</p> <p>Prior to the approval of each subsequent development project, the project applicant shall submit a comprehensive soil and geologic evaluation of the project site to the City Engineer and/or Building Official for review and approval. The evaluation shall be prepared by a licensed geotechnical engineer in order to identify site-specific conditions and to determine whether potential soil and geologic hazards exist on the site. The evaluation shall include, but not be limited to, a delineation of specific locations where liquefiable, compressive, and expansive soils would affect structural stability and where graded slopes would expose bedrock susceptible to instability. Liquefiable, expansive, or compressive soils shall be removed from the site and shall be replaced with compacted fill.</p>	Significant	5.4.5-1 & 5.4.5-2	Not Significant	

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
GEOLOGY/SOILS (cont.)				
	<p>Mitigation Measure 5.4.5-2: Prior to the issuance of a building permit for each subsequent development project, the City Building Official shall verify that the design of all structures proposed for a specific site comply with the requirements of all federal, state and local building codes and regulations governing earthquake safety and structural stability and with the standard practices of the Association of Structural Engineers of California.</p>			

SBM = Significance before Mitigation

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>PALEONTOLOGICAL RESOURCES</p> <p><i>Paleontological Sensitivity.</i> The UCSP area contains a large expanse of moderate paleontological resource sensitivity. Exposure or disturbance of unnamed nearshore marine sandstone and the Linda Vista Formation would potentially significantly impact paleontological resources. Because the UCSP area is fully developed with urban uses, future grading would typically be minimal except in areas with sub-garages and sub-floors. Development proposed in areas of moderate sensitivity that propose to grade in excess of 2000 cubic yards and five feet deep will require mitigation.</p>	<p>Mitigation Measure 5.5-1</p> <p>Subsequent development projects that propose grading in excess of 2,000 cubic yards and five feet depth in areas of moderate sensitivity for paleontological resources shall be required to implement a pre-construction or construction monitoring program, or both, as a condition of approval. All mitigation programs shall be performed by a qualified professional paleontologist, defined here as an individual with a M.S. or Ph.D. in paleontology or geology who has proven experience in San Diego County paleontology and who is knowledgeable in professional paleontological procedures and techniques. Fieldwork may be conducted by a qualified paleontological monitor, defined here as an individual who has experience in the collection and salvage of fossil materials. The paleontological monitor shall always work under the direction of a qualified paleontologist.</p>	Significant	5.5-1	Not Significant

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SAM = Significance after Mitigation

**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
PALEONTOLOGICAL RESOURCES (cont.)	<p>Pre-construction mitigation. This method of mitigation is only applicable to instances where well-preserved and significant fossil remains, discovered in the assessment phase, would be destroyed during initial clearing and equipment move-on. The individual tasks of this program include:</p> <ol style="list-style-type: none"> 1. Surface prospecting for exposed fossil remains, generally involving inspection of existing bedrock outcrops but possibly also excavation of test trenches; 2. Surface collection of discovered fossil remains, typically involving simple excavation of the exposed specimen but possibly also plaster jacketing of large and/or fragile specimens or more elaborate quarry excavations of richly fossiliferous deposits; 3. Recovery of stratigraphic and geologic data to provide a context for the recovered fossil remains, typically including description of lithologies of fossil-bearing strata, measurement and description of the overall stratigraphic section, and photographic documentation of the geologic setting; 			

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MM = Mitigation Measures

SAM = Significance after Mitigation

**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
PALEONTOLOGICAL RESOURCES (cont.)				
	<p>4. Laboratory preparation (cleaning and repair) of collected fossil remains, generally involving removal of enclosing rock material, stabilization of fragile specimens (using glues and other hardeners), and repair of broken specimens;</p> <p>5. Cataloging and identification of prepared fossil remains, typically involving scientific identification of specimens, inventory of specimens, assignment of catalog numbers, and entry of data into an inventory database;</p> <p>6. Transferal, for storage, of cataloged fossil remains to an accredited institution (museum or university) that maintains paleontological collections (including the fossil specimens, copies of all field notes, maps, stratigraphic sections, and photographs); and</p> <p>7. Preparation of a final report summarizing the field and laboratory methods used, the stratigraphic units inspected, the types of fossils recovered, and the significance of the curated collection.</p>			

SBM = Significance before Mitigation

MM = Mitigation Measures

SAM = Significance after Mitigation

**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
PALEONTOLOGICAL RESOURCES (cont.)	<p>Construction mitigation. Under this program, mitigation occurs while excavation operations are underway. The scope and pace of excavation generally dictate the scope and pace of mitigation. The individual tasks of a construction mitigation program typically include:</p> <ol style="list-style-type: none"> 1. Monitoring of excavation operations to discover unearthed fossil remains, generally involving inspection of ongoing excavation exposures (e.g., sheet graded pads, cut slopes, roadcuts, basement excavations, and trench sidewalls); 2. Salvage of unearthed fossil remains, typically involving simple excavation of the exposed specimen but possibly also plaster jacketing of large and/or fragile specimens, or more elaborate quarry excavations of richly fossiliferous deposits; 3. Recovery of stratigraphic and geologic data to provide a context for the recovered fossil remains, typically including description of lithologies of fossil-bearing strata, measurement and description of the overall stratigraphic section, and photographic documentation of the geologic setting; 			

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MM = Mitigation Measures

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
PALEONTOLOGICAL RESOURCES (cont.)				
	<p>4. Laboratory preparation (cleaning and repair) of collected fossil remains, generally involving removal of enclosing rock material, stabilization of fragile specimens (using glues and other hardeners), and repair of broken specimens;</p> <p>5. Cataloging and identification of prepared fossil remains, typically involving scientific identification of specimens, inventory of specimens, assignment of catalog numbers, and entry of data into an inventory database;</p> <p>6. Transferal, for storage, of cataloged fossil remains to an accredited institution (museum or university) that maintains paleontological collections, including the fossil specimens, copies of all field notes, maps, stratigraphic sections and photographs; and</p> <p>7. Preparation of a final report summarizing the field and laboratory methods used, the stratigraphic units inspected, the types of fossils recovered, and the significance of the curated collection.</p>			

SBM = Significance before Mitigation

MM = Mitigation Measures

SAM = Significance after Mitigation

**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>POPULATION/HOUSING</p> <p>Population Growth Inducement. The UCSP would induce substantial population growth in the UCSP Subdistricts Area as planned for in the GPU, by providing development regulations and design guidelines which are intended to direct a portion of the growth which is expected to occur in the City to the UCSP Subdistricts Area. Between 2004 and 2030, the City's population is expected to increase by over 30 percent. Buildout of the Subdistricts Area over the next 25 years is anticipated to result in a total urban core population of 27,864 by 2030, an estimated increase of 18,318 or nearly triple the existing population.</p> <p>The proposed UCSP would have a beneficial impact on planned population and housing through the implementation of "smart growth" principles, consistent with the GPU, by allowing higher density and intensity development in areas in and around transit and commercial corridors, and on vacant and underutilized land. Therefore, the substantial population growth planned for the Subdistricts Area will not result in a significant impact.</p> <p>The secondary environmental impacts associated with increased population in the UCSP area (such as traffic, air quality, noise) are discussed in the respective topic summaries of this table and in the sections of this report.</p>	<p>No mitigation required.</p>	<p>Not Significant</p>	<p>None Required</p>	<p>Not Significant</p>

SBM = Significance before Mitigation

MM = Mitigation Measures

SAM = Significance after Mitigation

**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>POPULATION/HOUSING (cont.)</p> <p>Displacement of Housing. The UCSP will not displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere. The majority of the existing uses in the Subdistricts Area are low intensity commercial and offices uses, particularly along the major corridors of E Street, Broadway, H Street, and Third Avenue. The majority of new development in the Subdistricts Area is expected to replace these low-intensity non-residential uses with higher intensity, mixed-use development that will substantially increase the number of housing units. Housing that may be removed by individual projects completed in compliance with the UCSP does not necessitate the construction of housing elsewhere because the overall number of housing units would be accommodated with the UCSP. Therefore, the UCSP will not have a significant impact on the displacement of housing necessitating the construction of replacement of housing elsewhere.</p>	No mitigation required.	Not Significant	None Required	Not Significant
<p>Displacement of People. The majority of new development in the Subdistricts Area is expected to replace existing low-intensity non-residential uses with higher intensity, mixed-use development that will substantially increase the number of housing units available to people who wish to reside in the project area. Although the removal of existing housing may result in a temporary displacement of some people, the displacement is not considered a significant impact because the numbers of units planned in the UCSP are sufficient to accommodate the affected population. Therefore, the UCSP will not have a significant impact on the displacement of substantial numbers of people necessitating the construction of replacement of housing elsewhere.</p>	No mitigation required.	Not Significant	None Required	Not Significant

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>HYDROLOGY/WATER QUALITY</p> <p>Surface and Ground Water Quality.</p> <p>Implementation of the proposed UCSP would allow a three-fold increase in population and associated intensification of existing urban land uses which would likely result in a substantial increase in direct runoff to drainage basins, municipal storm sewer systems, and eventual drainage to surface water and/or the ocean. This runoff will likely contain typical urban runoff pollutants such as sediment, pathogens, heavy metals, petroleum products, nutrients (phosphates and nitrates) and trash. This comprises a potentially significant long-term water quality impact.</p> <p>The potential long-term impacts to water quality which may result from implementation of the proposed UCSP would be required to be reduced to acceptable levels through the mandatory controls imposed by local, state, and federal regulations. In addition, selected provisions of the UCSP that allow and encourage native plant landscaping and sustainable building practices (water input and waste efficiencies, living roofs, bioswales, etc.) would potentially lessen future runoff volumes, flow rate and pollutant concentration.</p>	<p>Mitigation Measure 5.7-1: Prior to approval of subsequent individual development projects, compliance with all applicable federal, state and local laws and regulations regarding water quality (e.g. JURMP, SUSMP, NPDES, SWPP, and City Development and Redevelopment Projects Storm Water Manual) shall be demonstrated to the satisfaction of the City Engineer.</p>	Significant	5.7-1 through 5.7-4	Not Significant

SBM = Significance before Mitigation

MM = Mitigation Measures

SAM = Significance after Mitigation

**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>HYDROLOGY/WATER QUALITY (cont.)</p> <p>The construction activities of subsequent individual projects would also potentially cause short-term water quality impacts through direct discharge of pollutants, soil excavation/sedimentation, and through encountering of shallow groundwater during subfloor grading. This comprises a potentially significant short-term water quality impact.</p>	<p>Mitigation Measure 5.7-2: Prior to approval of subsequent individual development projects, project applicants shall demonstrate to the satisfaction of the City Engineer that the proposed on-site storm drain systems fully mitigate drainage impacts and meet all federal, state, and regional water quality objectives and all City standards and requirements. Land development construction drawings and associated reports shall include details, notes, and discussions relative to the required or recommended Best Management Practices (BMPs). Permanent storm water BMP requirements shall be incorporated into the project design and all subsequent individual development projects are required to complete the applicable Storm Water Compliance Forms and comply with the City of Chula Vista's Storm Water Management Standards Requirements Manual.</p>			

SBM = Significance before Mitigation

MM = Mitigation Measures

SAM = Significance after Mitigation

**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
HYDROLOGY/WATER QUALITY (cont.)	<p>Mitigation Measure 5.7-3: The City of Chula Vista requires that all new development and significant redevelopment projects comply with the requirements of the NPDES Municipal Permit, Order No. 2001-01. According to said permit, all projects falling under the Priority Development Project Categories are required to comply with the Standard Urban Storm Water Mitigation Plans (SUSMP) and Numeric Sizing Criteria. Future projects shall comply with all applicable regulations, established by the United States Environmental Protection Agency (USEPA), as set forth in the National Pollutant Discharge Elimination System (NPDES) permit requirements for urban runoff and storm water discharge, and any regulations adopted by the City of Chula Vista pursuant to the NPDES regulations and requirements. Further, the applicant shall file a Notice of Intent (NOI) with the State Water Resource Control Board to obtain coverage under the NPDES General Permit for Storm Water Discharges Associated with Construction Activity and shall</p>			

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
HYDROLOGY/WATER QUALITY (cont.)	<p>implement a Storm Water Pollution Prevention Plan (SWPPP) concurrent with the commencement of grading activities. The SWPPP shall include both construction and post-construction pollution prevention and pollution control measures, and shall identify funding mechanisms for the maintenance of post-construction control measures.</p> <p>Mitigation Measure 5.7-4: Prior to issuance of an Urban Core Development Permit or other discretionary permit, all subsequent individual development projects shall demonstrate to the satisfaction of the Community Development Director, conformance with Mediterranean/indigenous landscaping and other relevant design recommendations provided in UCSP Chapter VII Development Design Guidelines.</p>			

SBM = Significance before Mitigation

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>HYDROLOGY/WATER QUALITY (cont.)</p> <p>Groundwater Depletion. The UCSP area does not overlie a productive groundwater recharge basin or aquifer recharge area. The San Diego Formation Aquifer, which underlies the UCSP area, is of marginal groundwater use because of poor quality due to saltwater intrusion from nearby San Diego Bay. Potable water supply to the UCSP area is, and will continue to be, provided by the Sweetwater Authority from a combination of local supply (obtained from eastern groundwater wells and a desalination facility) augmented by imported water purchased from the Metropolitan Water District. The Sweetwater Authority has verified availability of future water supplies to serve the proposed UCSP without depletion of groundwater resources (refer to Section 5.12.1). Therefore, impacts to groundwater resources availability resulting from implementation of the proposed UCSP would not be significant.</p>	No mitigation required.	Not Significant	None Required	Not Significant

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>HYDROLOGY/WATER QUALITY (cont.)</p> <p>Drainage/Flooding. The physical drainage pattern of the urban core will not be substantially altered by implementation of the UCSP. The UCSP area is highly urbanized, flat, paved with impervious surfaces, and contains very little vacant land. Development in accordance with the UCSP will not substantially alter this existing topography and associated drainage patterns.</p> <p>The three-fold increase in population and associated intensification of urban land uses allowed in the UCSP will increase surface runoff. When compared to existing conditions, however, land use associated with redevelopment and implementation of the UCSP is generally similar in nature, from a perspective of hydrologic response. Because the typical percentage of imperviousness for a given parcel of land is similar between the existing and redeveloped condition, implementation of the UCSP will result in minimal impacts to existing drainage infrastructure. In addition, proposed pavement improvements combined with sustainable building incentives will reduce drainage impacts. Thus, the existing drainage capacity would not be exceeded in a manner which would result in on- or off-site flooding, and drainage and flooding impacts are thus considered to be not significant.</p>	No mitigation required.	Not Significant	None Required	Not Significant

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>TRAFFIC/CIRCULATION</p> <p>Road Segments and Intersections Level of Service. A substantial increase in traffic on area roadways and at area intersections will result from planned population growth in the urban core area over the next 25 years. Without the intersection and roadway improvements envisioned in the proposed UCSP, by year 2030 conditions, 2 road segments and 19 intersections would operate at unacceptable LOS E or worse during peak traffic periods. This comprises a significant traffic impact prior to mitigation.</p> <p>The significant impacts to intersections will be mitigated to below significance by implementation of the improvements recommended in Mitigation Measure 5.8.5-1, with the exception of #27 Broadway/H Street, #33 Hilltop Drive/H Street and #54 Third Avenue/J Street. Impacts to these 3 intersections would remain significant and unavoidable <u>unmitigated</u>.</p> <p>Recommendations at intersections #27, #33, and #54 do not improve conditions to an acceptable LOS due to ROW and design constraints. The following describes the constraints at the three intersections:</p>	<p>Mitigation Measure 5.8.5 -1:</p> <p>Intersection Improvements. Impacts to the 19 affected intersections will be mitigated to below significance by the implementation of improvements that have been divided into three tiers for phased implementation based on need and enhancement of the overall street network. Generally, time frames associated with the tiered improvements are anticipated as short-, mid- and long-term. In each tier, the City's existing TMP will determine the order in which projects are implemented during the biannual CIP program review. The Tier 1 improvements would be included in the current CIP and subsequently monitored for improvement within the first five years of implementation of the UCSP. It should be noted that three of the intersections (#7, #16, and #21) are proposed as project features rather than as needed to improve intersection LOS and most likely will be related to and timed with implementation of streetscape improvements along Third Avenue.</p>	Significant	5.8.5-1, 5.8.5-2, & 5.8.5-3	Significant

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>TRAFFIC/CIRCULATION (cont.)</p> <ul style="list-style-type: none"> At the Broadway/H Street intersection (#27), an additional northbound and southbound through lane would be required in order to achieve an acceptable LOS D conditions. However, this improvement would require extensive widening of Broadway and H Street to allow for lane drops. Furthermore, this widening would create longer pedestrian crossings. As such, the recommended improvements of the eastbound queue jumper lane and the additional westbound through and right-turn lanes would improve the intersection from LOS F to LOS E conditions. At the Hilltop Drive/H Street intersection (#33), no improvements would be recommended due to ROW constraints. The poor LOS at this intersection is primarily caused by the high traffic volumes in the eastbound/westbound movements. Additional through and/or turn lanes would be required in order to improve this intersection to an acceptable LOS. With no improvements, this intersection would remain at LOS E during both peak periods. At the Third Avenue/J Street intersection (#54), the required improvement of an additional southbound right-turn lane would impact the existing commercial building (Henry's Marketplace), which is built adjacent to the sidewalk. Therefore, this improvement is not recommended. As a result, the LOS would remain at LOS E. However, if the property were to redevelop in the future, additional ROW could be obtained for the southbound right-turn lane. 	<p>The intersection numbers in the improvements described below correspond to the intersection numbering system used in the TIA (Appendix C of this EIR):</p> <p>a. Tier 1 Improvements</p> <ul style="list-style-type: none"> #1 Bay Boulevard/I-5 Southbound Ramp/E Street: Add an eastbound through and right-turn lane, southbound right-turn lane, and northbound right-turn lane. Coordination with Caltrans will be required for this improvement. #2 I-5 Northbound Ramp/E Street: Add a westbound right-turn lane. Coordination with Caltrans will be required for this improvement #7 Third Avenue/E Street: Convert the northbound and southbound shared right-through lane into exclusive right-turn lanes. #16 Third Avenue/F Street: Separate the southbound shared through-right lane into an exclusive through and right-turn lanes, convert the northbound shared through-right lane into an exclusive right-turn lane. 			

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>TRAFFIC/CIRCULATION (cont.)</p> <p>The potential significant impacts to street segments will be mitigated to below significance by implementation of the improvements recommended in Mitigation Measure 5.8.5-2, with the exception of Third Avenue between E and G Streets. The significant and unavoidable impact to this street segment result from the design of the project, which is intended to reduce Third Avenue to a two-lane downtown promenade to facilitate an enhanced pedestrian environment along the traditional commercial village. Although the planned improvements would result in an unacceptable LOS, they would meet the project objectives of creating a more pedestrian friendly and active streetscape that will accommodate multi-modes of transportation rather than accommodating only the automobile.</p> <p>Development of alternative modes of transportation to accommodate pedestrians, bicyclists, and public transit, as planned for by the UCSP, will increase alternate forms of mobility by introducing traffic calming elements, pedestrian improvements and paseos. In addition, the reintroduction of the street grid, West Side Shuttle and future regional transit improvements that are planned to serve the Urban Core will serve to offset traffic impacts related to automobile use within the UCSP.</p>	<ul style="list-style-type: none"> • #21 Third Avenue/G Street: Convert the northbound/southbound shared through-right lane into exclusive right-turn lanes. • #24 I-5 Southbound Ramp/H Street: Add a southbound left, eastbound through and right-turn lanes. Coordination with Caltrans will be required for this improvement. • #25 I-5 Northbound Ramp/H Street: Add a westbound through and right-turn lane and restripe south approach to accommodate dual left-turn lanes. Coordination with Caltrans will be required for this improvement. • #26 Woodlawn Avenue/H Street: Change Woodlawn Avenue to a one-way couplet. This improvement is required to serve the intense redevelopment occurring on both sides of H Street. The couplet improvement is not required mitigation further north toward E Street. 			

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>TRAFFIC/CIRCULATION (cont.)</p> <p>While existing TransNet funding is expected to cover some of the costs of roadway and transit improvements and existing traffic signal fees currently collected as new development occurs would be applied, as appropriate, to identified signal-phasing improvements, the Facilities Implementation Analysis (FIA) has identified proposed development fees that may be needed to fund some of the recommended traffic improvements. In addition, some of the improvements will require right of way dedications either as part of the development process or concurrent with capital improvements, and/or coordination with Caltrans.</p> <p>Due to the long-term nature of some of the improvements, the fee program and coordination have either not been implemented or begun, respectively, whereas the right of way exactions would occur with redevelopment. While these improvements are intended to be implemented when necessary and within the Tiers noted above, their long-term implementation cannot be assured at this time. Identified significant impacts will be partially mitigated but due to the lack of funding assurances at this time, future coordination with CALTRANS and SANDAG, and future right of way exactions, impacts are considered significant and unmitigated.</p>	<p>Mitigation</p> <ul style="list-style-type: none"> • #27 Broadway/H Street: Add an eastbound transit queue jumper lane and westbound through and right-turn lanes. • #28 Fifth Avenue/H Street: Change the northbound/southbound approaches to include protective plus permissive phasing and add a westbound right-turn lane. • #29 Fourth Avenue/H Street: Add an eastbound/westbound right-turn lane. • #44 Fourth Avenue/SR-54 Eastbound Ramp: Add an eastbound right-turn lane. Coordination with Caltrans will be required for this improvement. b. Tier 2 Improvements <ul style="list-style-type: none"> • #34 Broadway/SR-54 Westbound Ramp: Add a westbound right-turn lane. Coordination with Caltrans will be required for this improvement. • #59 J Street/I-5 Northbound Ramp: Add an eastbound left-turn and westbound right-turn lane. Coordination with Caltrans will be required for this improvement. 			

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
TRAFFIC/CIRCULATION (cont.)	<ul style="list-style-type: none"> • #61 L Street/Bay Boulevard: Signalize the intersection, add a southbound left-turn lane, and a northbound right-turn overlap phase to the traffic signal. • #63 Bay Boulevard/I-5 Southbound Ramp: Signalize the intersection. Coordination with Caltrans will be required for this improvement. • #64 Industrial Boulevard/I-5 Northbound Ramp: Signalize the intersection. Coordination with Caltrans will be required for this improvement. • H Street from four lanes to six lanes from I-5 to Broadway <p>c. Tier 3 Improvements</p> <ul style="list-style-type: none"> • #13 Broadway/F Street: Add an eastbound right-turn lane. • #45 Fourth Avenue/Brisbane Street: Add a southbound right-turn overlap phase to the traffic signal. • #57 Second Avenue/D Street: Convert to an all-way stop controlled intersection. 			

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
TRAFFIC/CIRCULATION (cont.)	<p>On an annual basis during buildout of the UCSP, the City shall apply the TMP to monitor actual performance of the street system in the Subdistricts Area by conducting roadway segment travel time studies in accordance with the City's Growth Management Program and Traffic Threshold Standards. The results of the annual study under the TMP will be used by the City to determine the timing and need for implementation of improvements to the nineteen intersections identified above as having potential significant impacts. The City shall implement the intersection improvements in phases based on the results of the annual TMP and on need and enhancement to the function of the overall street network. In addition to determining timing and need, this systems and operations monitoring approach should also be used to further ascertain final design details of the intersection improvements and may include consideration of the effects on traffic flow as well as the impacts/benefits to other travel modes (e.g., pedestrians and bicycles) that are foundational to the successful implementation of the Specific Plan.</p>			

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
TRAFFIC/CIRCULATION (cont.)	<p>Mitigation Measure 5.8.5-2: Segment Improvements. During build-out of the UCSP, the City shall apply the Traffic Monitoring Program (TMP) to monitor actual performance of the street system in the Subdistricts Area by conducting roadway segment travel time studies in accordance with the City's Growth Management Program and Traffic Threshold Standards. The results of the annual study under the TMP will be used by the City to determine the timing and need for implementation of improvements to the street segments identified as having potential significant impacts. The City shall implement the following street segment improvements: 1) based on the results of the annual TMP; or 2) based on need and enhancement to the function of the overall street network; and 3) in a manner that efficiently implements with phasing of necessary adjacent intersection improvements.</p>			

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
TRAFFIC/CIRCULATION (cont.)				
	<p>1) H Street between I-5 and Broadway would be reclassified as a six-lane gateway. As a result, the acceptable ADT would increase and result in an acceptable LOS.</p> <p>2) Third Avenue between E Street and G Street would be constructed as a two-lane downtown promenade to facilitate an enhanced pedestrian environment along the traditional commercial village. As a result, the acceptable ADT along the segment would decrease and result in an unacceptable LOS. As such, impacts to Third Avenue will be significant and unavoidable. However, the Third Avenue corridor intersections at E, F and G Streets would all operate at an acceptable LOS.</p>			

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
TRAFFIC/CIRCULATION (cont.)	<p>Mitigation Measure 5.8.5- 3:</p> <p>Prior to issuance of an Urban Core Development Permit, subsequent development projects shall prepare a traffic assessment to quantify the projects' potential traffic impacts. Subsequent projects will be required to contribute their fair share to the Tiered Improvements listed above under Mitigation 5.8.5.1. Mitigation may be in the form of:</p> <p>1 Payment of Transportation Development Impact Fee (TDIF), as may be established in the future for the western portion of the City;</p> <p>2 Payment of existing Traffic Impact Signal Fee;</p> <p>3 Construction of improvements within the project boundaries; and/or</p> <p>4 Early advancement of improvements beyond the project boundaries, subject to a reimbursement agreement.</p>			

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
TRAFFIC/CIRCULATION (cont.)	<p>The City's TDIF program for the west side of the City, including the Urban Core is anticipated to be developed within the subsequent twelve months following adoption of the UCSP. The TDIF will clearly establish the costs of the improvements identified above as well as the fair share costs to be applied to all subsequent development projects. Once the TDIF has been established, the fee will be consistently applied to all subsequent development projects, until such time that the TDIF is amended or rescinded. In the interim, if subsequent development projects are processed and approved prior to the establishment of a TDIF, a condition of approval will be included that prior to issuance of building permits the project will contribute to the TDIF, as may be established.</p>			

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	
<p>TRAFFIC/CIRCULATION (cont.)</p> <p>Pedestrian, Bicycling and Public Transit. The hierarchy of emphasis of different forms of mobility in the proposed UCSP is to accommodate pedestrians first, then bicyclists, public transit, and finally, the automobile. Through the introduction of traffic calming element, pedestrian improvements and paseos, the UCSP provides for an enhanced pedestrian environment in the UCSP area. Provisions of the UCSP, in concert with the City Bikeway Master Plan, address deficiencies in the bikeway network and recommend new and upgraded bikeway facilities throughout the area for both recreational and commuting users. The proposed UCSP thus serves to benefit, rather than to deteriorate, mobility conditions for pedestrians and bicyclists and does not conflict with any adopted plans or programs supporting alternative transportation.</p>	<p>Mitigation Measure 5.8.5-4: Prior to issuance of an Urban Core Development Permit for subsequent development projects, the traffic assessment prepared to quantify the projects' potential traffic impacts will also identify how alternative modes of transportation will be accommodated. Mitigation may be in the form of:</p> <ol style="list-style-type: none"> 1) Compliance with the development regulations and design guidelines of the UCSP to accommodate pedestrians, bicyclists and public transit; and 2) Where applicable, construction of improvements within the project boundaries; and/or 3) Early advancement of improvements beyond the project boundaries, subject to a reimbursement agreement. 	Potentially Significant	5.8.5-4	Not Significant

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Proposed UCSP		
	Mitigation	SBM	MM
<p>TRAFFIC/CIRCULATION (cont.)</p> <p>The three-fold increase in population projected for the UCSP Subdistricts Area by 2030 would place greater demands on public transit services. A number of new and better regional transit improvements are already planned that will adequately serve the UCSP area. In addition, the UCSP incorporates smart growth strategies to lessen automobile use and increase public transit and other mobility use by providing a mix of compatible land uses, locating highest density near transit stations, utilizing compact building design and creating walkable and bikeable communities. A West Side Shuttle is also proposed to serve both the UCSP and the nearby Bayfront, which would complement existing and planned future transit improvements.</p> <p>Impacts to alternative forms of transportation as a result of the proposed UCSP would thus not be significant nor adverse given adherence of subsequent projects to relevant regulations and guidelines of the UCSP.</p>			

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>TRAFFIC/CIRCULATION (cont.)</p> <p>Parking. The UCSP allows for an intensification of development in the urban core which will create an increased demand for off-street parking. The Land Use and Development Regulations of the UCSP include parking requirements that specify parking locations and the number of parking spaces per land use. A projected total of 18,560 parking spaces would be required to serve future development of the proposed UCSP at buildout. While the majority of new development will provide on-site parking, there are specific location such as within the Village District and transit focus areas that allow some parking needs to be met off-site and/or through alternative means such as in-lieu fees and shared parking arrangements. In addition, a number of other parking improvement strategies are included in the UCSP including raking buffers, parking districts and parking structures.</p> <p>Potential significant impacts to parking would be reduced to below significance by the incorporation of these development regulations and design guidelines into subsequent development projects, as required as part of the UCSP design review process. Parking improvements will either be made on-site (i.e. where required of subsequent development projects), or off-site (i.e. in coordination with the City's Parking District or in Lieu Fee program).</p>	<p>Mitigation Measure 5.8.5-5: Prior to issuance of an Urban Core Development Permit, subsequent development projects shall comply with the parking standards set forth in the UCSP development regulations and design guidelines for the type and intensity of development proposed.</p>	Potentially Significant	5.8.5-5	Not Significant

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>TRAFFIC/CIRCULATION (cont.)</p> <p><u>Multi-Jurisdictional Efforts.</u> The proposed UCSP will result in both direct and cumulatively significant traffic impacts to study area freeway segments and ramps. As described above under Road Segments and Intersections Level of Service, the following freeway interchanges would be significantly impacted by the proposed UCSP:</p> <ul style="list-style-type: none"> • #1: Bay Boulevard/I-5 SB ramp at E Street (LOS E – AM Peak, LOS F – PM Peak); • #2: I-5 NB Ramp at E Street (LOS E – AM and PM Peak); • #24: I-5 SB Ramp at H Street (LOS F – PM Peak); • #25: I-5 NB Ramp at H Street (LOS F – PM Peak); • #34: Broadway at SR-54 WB Ramp (LOS F – AM Peak); • #44: Fourth Avenue at SR-54 EB Ramp (LOS F – PM Peak); • #59: J Street at I-5 NB Ramp (LOS F – AM Peak, LOS E – PM Peak); • #63: Bay Boulevard at I-5 SB Ramp (LOS F – AM and PM Peak); and • #64: Industrial Boulevard at I-5 NB Ramp (LOS F – PM Peak). <p>The monitoring of traffic as stipulated by Mitigation Measure 5.8.5-1 will assist in establishing the need and timing for transportation improvements, including freeway-related improvements, serving the</p>	<p><u>Mitigation Measure 5.8.5-6:</u></p> <p>The City shall participate in a multi-jurisdictional effort conducted by Caltrans and SANDAG to assist in developing a detailed engineering study of the freeway right-of-way that will identify transportation improvements along with funding, including federal, state, regional, and local funding sources, and phasing, that would reduce congestion consistent with Caltrans Standards on the I-5 South corridor from the State Route 54 (SR-54) interchange to State Route 75 (SR-75)/Palm Avenue (the "I-5 South Corridor") (hereinafter, the "Plan). Local funding sources may include fair share contributions by private development based on nexus as well as other mechanisms. The Plan required by this mitigation shall include the following:</p> <p>1) The responsible entities (the "Entities") included in this effort will include, but may not be limited to the City, the Port, SANDAG, and Caltrans. Other entities may be included upon the concurrence of the foregoing Entities.</p>			

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>TRAFFIC/CIRCULATION (cont.)</p> <p>UCSP area. In addition, Mitigation Measure 5.8.5-3 requires subsequent development projects to prepare a traffic assessment to quantify the project's potential traffic impacts. Subsequent projects will also be required to contribute their fair share to the Tiered Improvements listed above under Mitigation 5.8.5.1.</p> <p>Mitigation of impacts will require development and regional acceptance of a feasible program to improve freeway segments and ramps in the Urban Core area. The City, along with Caltrans, and SANDAG will continue to pursue and promote improvement of the I-5 freeway facilities adjacent to the UCSP area. The concept of promoting/requiring "fair-share" contributions on the part of developers for improvements to the freeway system will need to be addressed as part of the implementation of an acceptable program to improve freeway segments and ramps. As such, the specification of such requirements cannot be determined at this time. Mitigation Measure 5.8.5-6 was developed to ensure the continued participation in regional transportation planning efforts by the City, Caltrans, SANDAG, and other entities as may be identified.</p> <p>The City of Chula Vista shall continue to work with SANDAG and Caltrans on an ongoing basis to identify sources and obtain funding for a variety of transportation system improvements. Future</p>	<p>2) The Plan will specifically identify physical and operational improvements to I-5, relevant arterial roads and transit facilities (the "improvements"), that are focused on specific transportation impacts, and will also identify the fair share responsibilities of each Entity for the construction and financing for each Improvement. The Plan may also identify other improvements necessary to address regional transportation needs, but for purposes of this mitigation measure, the Improvements included in the Plan need only be designed to mitigate the impacts created by the Proposed Project.</p> <p>3) The Plan will set forth a timeline and other agreed-upon relevant criteria for implementation of each Improvement.</p> <p>4) The Plan will identify the total estimated design and construction cost for each Improvement and the responsibility of each Entity for both implementation and funding of such costs.</p>			

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>TRAFFIC/CIRCULATION (cont.) residential growth in the Urban Core will be subject to the Regional Transportation Congestion Improvement Program, as stipulated by the Transnet legislation and will provide additional funds for improvement of the regional arterial system.</p>	<p>5) <u>The Plan will include the parameters for any fair-share funding contributions to be implemented, that would require private and/or public developers to contribute to the costs, in a manner that will comply with applicable law.</u></p> <p>6) <u>In developing the Plan, the Entities shall also consider ways in which the Improvements can be coordinated with existing local and regional transportation and facilities financing plans and programs, in order to avoid duplication of effort and expenditure; however, the existence of such other plans and programs shall not relieve the Entities of their collective obligation to develop and implement the Plan as set forth in this mitigation measure. Nothing in the Plan shall be construed as relieving any Entity (or any other entity) from its independent responsibility (if any) for the implementation of any transportation improvement.</u></p>			

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
TRAFFIC/CIRCULATION (cont.)				
	<p>7) <u>The City shall seek adoption of the Plan before the City Council upon the completion of the multi-jurisdictional effort to develop the Plan. The City shall report, to their governing bodies regarding the progress made to develop the Plan within six months of the first meeting of the Entities. Thereafter, the City shall report at least annually regarding the progress of the Plan, for a period of not less than five years, which may be extended at the request of the City Council.</u></p> <p>8) <u>The Plan shall also expressly include each Entity's pledge that it will cooperate with each other in implementing the Plan. The failure or refusal of any Entity other than the City to cooperate in the implementation of this mitigation measure shall not constitute failure of the City to implement this mitigation measure; however, the City shall use its best efforts to obtain the cooperation of all responsible Entities to fully participate in order to achieve the goals of the mitigation measure.</u></p>			

SBM = Significance before Mitigation

MM = Mitigation Measures

SAM = Significance after Mitigation

**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>NOISE</p> <p>Exterior Noise. The UCSP would result in a significant exterior noise impact because it would result in exposure of receivers in the UCSP area to exterior noise levels that exceed the levels established by the GPU and the City's noise control ordinance. The noise threshold include exterior limits of 65 CNEL in residential areas, outdoor use areas, neighborhood parks, and playgrounds, 70 CNEL in office and professional areas, or 75 decibels for retail and wholesale commercial areas, restaurants, and movie theaters.</p> <p>The siting of future parks has the potential to result in significant impacts. While park sites have not been designated, it is possible that parks could be sited next to circulation element roadways which generate noise in excess of 65 [to 70] decibels. This would be a significant impact and would require mitigation. Mitigating this impact would require the construction of noise barriers. Required barrier heights may be achieved through the construction of walls, berms, or wall/berm combinations. While noise levels at a park site would be reduced by the construction of noise barriers, these barriers are incompatible with park uses.</p>	<p>Mitigation Measure 5.9-1: Exterior Noise Mitigation Measure. Prior to the approval of individual development projects, projects within the UCSP area shall demonstrate that required outdoor usable open space areas are adequately shielded from transportation related noise sources so that noise levels fall below the standards set by the General Plan Update (see Figure 5.9-1 and Table 5.9-1) <u>or do not cause an increase of greater than 3 dB(A) on an existing roadway.</u> Noise reduction measures may include building noise-attenuating berms, walls or other attenuation measures. Future development of park facilities shall also, to the extent feasible, incorporate mitigation measures such as siting, berms, walls or other attenuation measures to reduce impacts to acceptable levels of 65-70 CNEL or less. Indication that noise levels fall below this limit shall be made to the satisfaction of the Planning and Building Director, Building Official or Community Development Director.</p>	Significant	5.9-1	Significant

SBM = Significance before Mitigation

MM = Mitigation Measures

SAM = Significance after Mitigation

**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
NOISE (cont.)				
	<p>Because the only mitigation available to reduce exterior noise impacts to parks resulting from roadway traffic is the insertion of a barrier between the source (traffic) and receiver (park), and because parks are intended to remain open (i.e., not surrounded by walls) to the community, exterior noise impacts cannot be fully mitigated. There are no feasible mitigation measures available to mitigate for the potential for parks that are to be sited next to circulation element roadways which generate noise in excess of 65-70 CNEL. Therefore, exterior noise impacts remain significant and unmitigated.</p>			

SBM = Significance before Mitigation

MM = Mitigation Measures

SAM = Significance after Mitigation

**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>NOISE (cont.)</p> <p>Interior Noise. The adoption of the UCSP would have a significant noise impact prior to mitigation because it would result in interior noise levels that exceed 45 dB CNEL due to exterior sources for habitable rooms in residences.</p>	<p>Mitigation Measure 5.9-2: Interior Noise Mitigation Measure. Prior to the approval of subsequent individual development projects, for any residential use immediately adjacent to a circulation element roadway, trolley or rail line, or Interstate 5, an acoustical analysis shall be completed demonstrating to the satisfaction of the Planning and Building Director, Community Development Director or Building Official, that interior noise levels due to exterior sources are 45 CNEL or less in any habitable room. For residential projects where interior noise levels due to exterior noise sources exceed 45 CNEL, architectural and structural considerations such as improved window and door acoustical performance, shall be identified.</p> <p>Mitigation Measure 5.9-3: Interior Noise Mitigation Measure. Prior to the approval of individual development projects, projects where it is necessary for the windows to remain closed to ensure that interior noise levels meet the City's and the Building Code interior standard of 45 CNEL shall demonstrate that the design for these units includes a ventilation or air conditioning system which provides a habitable interior environment with the windows closed.</p>	Significant	5.9-2 and 5.9-3	Not Significant

SBM = Significance before Mitigation

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SAM = Significance after Mitigation

**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>NOISE (cont.)</p> <p>City Noise Ordinance. Until specific uses are identified, conformance to the City's noise control ordinance code cannot be assured and impacts associated with this criterion are significant.</p> <p>The UCSP would result in a significant noise impact because it would result in exposure of receivers in the UCSP area to exterior noise levels that exceed the levels established by the City's noise control ordinance. These include exterior limits of 65 CNEL in residential areas, outdoor use areas, neighborhood parks, and playgrounds, 70 CNEL in office and professional areas, or 75 decibels for retail and wholesale commercial areas, restaurants, and movie theaters.</p>	<p>Mitigation Measure 5.9-4: Noise Ordinance Mitigation Measure. Prior to the approval of individual development projects, commercial uses that may involve noise producing activities shall demonstrate compliance with the existing performance standards provided in the City's Noise Ordinance (Chapter 19.68.010 of the Municipal Zoning Code). Prior to project approval, subsequent projects shall also demonstrate compliance with the mixed-use provisions of Chapter VI of the UCSP that include minimization of the effects of any exterior noise impacts and provision of "internal compatibility between the different uses within the project" (UCSP, VI-44).</p>	Significant	5.9-4	Not Significant

SBM = Significance before Mitigation

MM = Mitigation Measures

SAM = Significance after Mitigation

**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>AIR QUALITY</p> <p>Air Quality Plan Consistency. The land uses proposed in the UCSP conform to the adopted GPU and are inconsistent with the former General Plan upon which the State Implementation Plan (SIP) and Regional Air Quality Standards (RAQS) were based. By changing land use designations in certain areas, the recently adopted GPU failed to conform with the growth projections used by SANDAG in their generation of the air quality management plan. Measures have been incorporated into the proposed UCSP to lessen air quality impacts. The UCSP has been prepared using the smart growth principles foundational to the General Plan such as providing a mix of compatible land uses; locating highest density near transit; utilizing compact building design and creating walkable communities; providing a range of infill housing opportunities; and increasing transportation choices. In particular, the UCSP focuses new development at key transit nodes and enhances alternative modes of travel by promoting walkability with enhanced pedestrian paths, augmenting existing bicycle paths, and making public transit more accessible and desirable with new and expanded public transit stops.</p>	<p>The only measure that can lessen this impact to a level below significance is the review and revision of the RAQS based on the recently adopted GPU. Since the updating of the air plan is outside of the authority of the City, no mitigation is available to the City to avoid this impact. Nonetheless, the City will cooperate with SANDAG and APCD in developing updated RAQS to insure their conformance with the adopted GPU and mitigation measure 5.10.5-1 is provided as an advisory measure.</p> <p>Mitigation Measure 5.10.5-1: The City of Chula Vista shall recommend to SANDAG to update the RAQS in the next triennial cycle to incorporate the increased land use densities of the GPU and UCSP.</p>	Significant	5.10.5-1	Significant

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>AIR QUALITY (cont.)</p> <p>However, since the GPU is inconsistent with the former General Plan upon which the goals and objectives of the RAQS were based, and the proposed UCSP conforms to the GPU, adoption of the proposed UCSP would result in significant conflict with an applicable air quality plan. This is a significant adverse impact.</p> <p>Because the significant air impact stems from an inconsistency between the land uses envisioned in the currently adopted GPU and the former General Plan upon which the RAQS were based, the only measure that can lessen this impact is the review and revision of the RAQS based on the recently adopted GPU. The RAQS are updated every three years, and will be updated again in 2007. This effort is the responsibility of SANDAG and APCD and is outside the jurisdiction of the City. The City will cooperate with SANDAG and APCD in developing updated RAQS to insure their conformance with the adopted GPU.</p>				
<p>Air Quality Standard Violation. There are no existing or projected air quality violations in the UCSP area. Furthermore, there are no toxic air emitters proposed as part of the UCSP. All proposed land uses are either multi-family residential, commercial, retail or public uses, and no industrial uses are proposed. Therefore, there will not be a significant contribution to an existing or projected air quality violation, and no significant impact relative to this criterion.</p>	No mitigation is required.	Not Significant	None Required	Not Significant

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>AIR QUALITY (cont.)</p> <p>Cumulatively Considerable Net Increase. The proportional increase in multi-family units to single-family units proposed in the UCSP and resulting decrease in number of vehicle trips per unit, and the anticipated improvement in motor vehicle emissions, result in an expected decrease in pollutants over existing conditions for all criteria pollutants except SO₂ and PM₁₀. Since the region is not in compliance with the PM_{2.5} and PM₁₀ standard, and because the average daily emission is anticipated to increase, impacts are considered significant, until the region is in compliance.</p>	<p>Mitigation Measure 5.10.5-2: Prior to issuance of an Urban Core Development Permit or other discretionary permit, all subsequent individual development projects shall demonstrate to the satisfaction of the Community Development Director, conformance with the relevant land use and development regulations (UCSP, Chapter VI) and development design guidelines (UCSP, Chapter VII) of the UCSP which support smart growth principles such as providing a mix of compatible land uses; locating highest density near transit; utilizing compact building design and creating walkable communities; providing a range of infill housing opportunities; and increasing transportation choices.</p>	Significant	5.10.5-2 and 5.10.5-3	Significant

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>AIR QUALITY (cont.)</p> <p>Cumulative increases in emissions in criteria pollutants for which the SDAB is not in attainment, would result from short-term construction of projects in conformance with the UCSP and from long-term emissions generated by both stationary and mobile sources within the UCSP area. Stationary source pollutant emissions would include those generated by the consumption of natural gas and electricity and the burning of wood in residential fireplaces. Vehicle traffic on area roads would generate mobile source emissions including carbon monoxide, nitrogen oxides, and hydrocarbons. Mitigation is achievable for fugitive dust from short-term construction activities, but the only measures that would reduce those emissions from long-term daily operations are those that reduce vehicle miles traveled on area roads. The UCSP includes measures aimed at promoting alternative modes of travel including enhanced pedestrian and bicycle activity, use of transit and reducing trip lengths by siting highest density adjacent to key transit nodes. Implementation of mitigation measures will ensure that conformance to these provisions of the UCSP is satisfied prior to issuance of subsequent project development permits.</p>	<p>Mitigation Measure 5.10.5-3: Prior to issuance of an Urban Core Development Permit or other discretionary permit, all subsequent individual development projects shall demonstrate compliance with relevant land use and development regulations contained in the UCSP to minimize air pollutant emissions. These include, but are not limited to: measures aimed at promoting pedestrian activity (Chapter V, pp. V-2- V-5); bicycle activity (Chapter V, pp. V-5 – V-7, V-9 – V-10); public transit facilities (Chapter V, pp. V8 – V-9), including the West Side Shuttle (Chapter V, pp. V-11 – V-12); and reintroduction of the traditional street grid (Chapter V, pp. V-16 – V-19).</p>			

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
AIR QUALITY (cont.)	<p>Mitigation Measure 5.10.5-4: Prior to issuance of construction permits, including but not limited to, the first Grading Permit, Demolition Permit, and Urban Core Development Permit, the Community Development Director shall verify that the following active dust control practices are to be employed during construction:</p> <ol style="list-style-type: none"> 1. All unpaved construction areas shall be sprinkled with water or other acceptable San Diego APCD dust control agents during dust-generating activities to reduce dust emissions. Additional watering or acceptable APCD dust control agents shall be applied during dry weather or windy days until dust emissions are not visible. 2. Trucks hauling dirt and debris shall be properly covered to reduce windblown dust and spills. 			

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
AIR QUALITY (cont.)	<p>3. A 20-mile-per-hour speed limit on unpaved surfaces shall be enforced.</p> <p>4. On dry days, dirt and debris spilled onto paved surfaces shall be swept up immediately to reduce resuspension of particulate matter caused by vehicle movement. Approach routes to construction sites shall be cleaned daily of construction-related dirt in dry weather.</p> <p>5. On-site stockpiles of excavated material shall be covered or watered.</p> <p>6. Disturbed areas shall be hydroseeded, landscaped, or developed as quickly as possible and as directed by the City and/or APCD to reduce dust generation.</p> <p>7. To the maximum extent feasible heavy-duty construction equipment with modified combustion/fuel injection systems for emissions control shall be utilized during grading and construction activities and catalytic reduction for gasoline-powered equipment shall be used.</p>			

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
AIR QUALITY (cont.)				
	<p>8. Equip construction equipment with prechamber diesel engines (or equivalent) together with proper maintenance and operation to reduce emissions of nitrogen oxide, to the extent available and feasible.</p> <p>9. Electrical construction equipment shall be used to the extent feasible.</p> <p>10. The simultaneous operations of multiple construction equipment units shall be minimized (i.e., phase construction to minimize impacts).</p> <p>With the application of these measures, significant impacts resulting from projected PM₁₀ impacts from construction would be mitigated. Impacts resulting from daily operation would remain significant until the region is determined to be in compliance with the standard.</p>			

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>AIR QUALITY (cont.)</p> <p>Sensitive Receptors. Although there is no adopted standard for sensitive receptors adjacent to Interstate 5, it was determined that air quality impacts from diesel particulates emanating from Interstate 5 would be cumulatively significant given current basin-wide noncompliance with particulate standards and projected future levels of diesel particulates emanating from Interstate 5.</p> <p>The project area is not exposed to an incremental cancer risk of greater than 10 in 1,000,000 from a major toxic emitter. Furthermore, CO concentrations do not exceed the California or federal ambient air quality standards for carbon monoxide, and predictive modeling demonstrates that future traffic volumes can operate without exposing people to substantial CO concentrations. The analysis conducted for the UCSP indicates that there will not be CO hotspots as a result of the buildout of the UCSP. Conformance to Policy LUT 13.2 of the GPU requiring the optimization and maintenance the performance of the traffic signal system and the street system, to facilitate traffic flow and to minimize vehicular pollutant emission levels will ensure that intersections operate at an adequate level of service to avoid potential CO concentrations in excess of adopted standards. Projected CO levels are thus considered to be not significant.</p> <p>Objectionable Odors. The UCSP does not propose uses that would create a significant odor impact, nor does it place a sensitive user in an area exposed to objectionable odors.</p>	<p>Cumulatively significant diesel particulate impacts would be reduced through mitigation measures 5.10.5-2 and 5.10.5-3 above, but not to below a level of significance.</p>	<p>Significant</p>	<p>5.10.5-2 and 5.10.5-3.</p>	<p>Significant</p>
	<p>No mitigation is required.</p>	<p>Not Significant</p>	<p>None Required</p>	<p>Not Significant</p>

SBM = Significance before Mitigation

MM = Mitigation Measures

SAM = Significance after Mitigation

**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>PUBLIC SERVICES</p> <p>Law Enforcement. Future development in accordance with the proposed UCSP would result in a significant impact to law enforcement services because of the anticipated increase in calls for service and the additional travel time required to answer these calls. While the police facility at Fourth Avenue and F Street is sufficient to meet the law enforcement needs created by increased demand resulting from development, more police officers will be needed in order to maintain response times. Significant impacts would result if timing of these provisions does not coincide with projected increase in demand for services and populations growth.</p> <p>Implementation of mitigation measures 5.11.1-1 through 5.11.1-3 would mitigate impacts to the provisions of adequate law enforcement services resulting from the adoption of the UCSP to below a level of significance.</p>	<p>Mitigation Measure 5.11.1-1: Subsequent development projects shall demonstrate that significant impacts to police services resulting from an individual project are addressed prior to approval of an Urban Core Development permit or other discretionary approval. As part of project review, subsequent development projects shall be evaluated for adequate access for police vehicles (pursuant to GPU Policy PFS 6.1) and integration of Crime Prevention Through Environmental Design (CPTED) techniques (pursuant to GPU Policy PFS 6.3).</p> <p>Mitigation Measure 5.11.1-2: As a condition of project approval, individual developers shall pay the public facilities development impact fees (PFDF) at the rate in effect at the time building permits are issued.</p> <p>Mitigation Measure 5.11.1-3: As part of the annual budgeting process, the City shall assess the need for additional police personnel to provide protection services consistent with established City service levels and commensurate with the increase in population.</p>	Significant	5.11.1-1, 5.11.1-2, and 5.11.1-3	Not Significant

SBM = Significance before Mitigation

MM = Mitigation Measures

SAM = Significance after Mitigation

**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>PUBLIC SERVICES (cont.)</p> <p>Fire Protection. The Chula Vista Fire Department does not currently meet the threshold standard for response time for the City, including the UCSP Subdistricts Area. Buildout of the proposed UCSP would increase demand for fire protection services. However, as population growth in the service area warrants, additional fire protection personnel and fire protection equipment and facilities would be provided. These provisions would help ensure adequate service within the requirements of the GMOG threshold standards. Significant impacts to fire protection services would result if timing of these provisions does not coincide with projected increase in demand for services and population growth.</p> <p>With the implementation of mitigation measures 5.11.2-1 through 5.11.2-3, significant impacts to the provision of fire protection services resulting from approval of the UCSP would be mitigated to less than significant.</p>	<p>Mitigation Measure 5.11.2-1: Prior to approval, subsequent individual development projects in the UCSP shall demonstrate provision of adequate access and water pressure for new buildings.</p> <p>Mitigation Measure 5.11.2-2: As a condition of project approval, individual developers shall pay the public facilities development impact fees at the rate in effect at the time building permits are issued.</p> <p>Mitigation Measure 5.11.2-3: As part of the annual budgeting process, the City will assess the need for additional fire personnel to provide protection services consistent with established City service levels and commensurate with the increase in population.</p>	Significant	5.11.2-1, 5.11.2-2, and 5.11.2-3	Not Significant

SBM = Significance before Mitigation

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SAM = Significance after Mitigation

**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>PUBLIC SERVICES (cont.)</p> <p>Schools. The proposed UCSP will result in a three-fold increase in population within the Subdistricts Area at buildout and an associated increase in demand for schools. The estimated number of students to be generated by the proposed UCSP upon buildout was based on current student generation factors of the two relevant school districts. At buildout, the UCSP is expected to generate a net increase of approximately 3,877 students between elementary, middle school, and high school grades. The generation of approximately 2,485 additional elementary students would have a significant impact on existing elementary schools serving the area because they are already at or near capacity. Using every available classroom seat, the new development would require at least 59 additional elementary school classrooms. (Potentially fewer students may result from UCSP buildout or interim conditions due to the nature of the allowable development under the UCSP. New residents of the intensified urban environment of mid- to high-rise mixed uses may likely be single or potentially childless young couples, or empty nesters. Therefore, the identified impacts may be overstated. Monitoring of these trends will be necessary to accurately plan for new student enrollment.)</p> <p>The land uses proposed for the UCSP would result in a significant impact to schools unless construction of facilities coincide with student generation and associated service demands.</p>	<p>Mitigation Measure 5.11.3-1: Prior to approval, subsequent development projects in the UCSP shall demonstrate that significant impacts to public educational services resulting from the individual project have been addressed. As a condition of project approval, individual developers shall pay the statutory school impact fees at the rate in effect at the time building permits are issued.</p>	Significant	5.11.3-1	Not Significant

SBM = Significance before Mitigation

MM = Mitigation Measures

SAM = Significance after Mitigation

**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>PUBLIC SERVICES (cont.)</p> <p>Libraries. Buildout of the UCSP may require additional library space in order to meet and maintain the City criteria of 500 square feet per 1,000 population and 3 books per person for new development. Based on the expected net increase in population of 18,318 with buildout of the UCSP, increased demand on existing library services would amount to approximately 9,159 square feet of library facilities and 54,954 books. Existing library service conditions in the City are inadequate and not in compliance with City standards. Additional library capacity is planned by 2007, however, with the construction of the 30,000 square foot Rancho Del Rey Library. In the absence of this or other new library construction, any additional demand on library services would comprise a significant impact.</p>	<p>The following mitigation measure will mitigate library impacts resulting from the adoption of the UCSP to below a level of significance.</p> <p>Mitigation Measure 5.11.4-1: Prior to approval, subsequent individual development projects in the UCSP shall demonstrate that significant impacts to the provision of library services resulting from individual projects have been addressed. As a condition of project approval, individual developers shall pay the public facilities development impact fees at the rate in effect at the time building permits are issued.</p>	Significant	5.11.4-1	Not Significant

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SAM = Significance after Mitigation

**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>PUBLIC SERVICES (cont.)</p> <p>Parks and Recreation. Implementation of the proposed UCSP would generate increased demand for parks and recreation facilities. The Chula Vista Municipal Code, Section 17.10 (the Park Development Ordinance – PDO) applies a standard of 3 acres of parkland for every 1,000 people to all new development. A significant impact could occur if dedication of parkland and construction of new facilities fees not coincide with project implementation and project population growth. Full buildout of the UCSP would be required to provide up to approximately 55 acres of new parkland. This additional parkland would be required incrementally and commensurate with new development.</p> <p>Implementation of mitigation measure 5.11.5-1 would reduce impacts to the provisions of park and recreation services and facilities resulting from the adoption of the UCSP to below a level of significance.</p>	<p>Mitigation Measure 5.11.5-1: Prior to approval of an Urban Core Development Permit, each subsequent project shall establish to the satisfaction of the Community Development Director that the project meets the City's parkland dedication requirement. As a condition of project approval, individual developers shall provide required parkland and facilities on-site, if possible and consistent with potential site locations identified in the UCSP and Parks Master Plan; or pay the applicable parkland acquisition and parkland development fee and recreation facility development impact fees at the rates in effect at the time building permits are issued.</p>	Significant	5.11.5-1	Not Significant

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
PUBLIC UTILITIES				
Water Supply. Pursuant to State Water Code and Senate Bills 610 and 221, the Sweetwater Authority, which is the local water provider to the UCSP area, prepared a Water Supply Assessment (WSA) in June 2005 to assess the adequacy of water supply to the proposed UCSP. The WSA recalculated existing projections which did not include the proposed UCSP to arrive at a daily demand for the UCSP Subdistricts Area of 3.54 million gallons per day. Given planned improvements to local water supply facilities (expansion of the Reynolds Desalination Facility and five new deep production wells) and assurances from the CWA of the availability of water purchases, the WSA concluded and verified the supply of future water for the proposed UCSP. Since there will be adequate water supplies to serve the UCSP along with existing and future uses, no significant water supply impacts would result from adoption of the UCSP.	No mitigation required.	None Required	Not Significant	
Water Treatment. Significant impacts could occur as a result of the construction of capital improvement projects needed to supply treated water to the UCSP. Pursuant to Section 15145 of CEQA, analysis of the physical changes that might occur from a future water treatment construction project would be too speculative and further analysis is thus not required in this EIR. Construction of new water supply and treatment facilities would, however, be subject to independent environmental analysis pursuant to CEQA at the time the new facility is planned for construction.	No mitigation required.	Not Significant	None Required	Not Significant

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**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
PUBLIC UTILITIES (cont.)				
<p>Wastewater Treatment Capacity. Chula Vista owns capacity in the Metro system, which provides conveyance of City wastewater flows. Increasing population will place additional demand on sewer services. While it is the intent of the City to ensure that services are provided concurrent with need, the provision of sewer services is not solely within its authority. Although the City is in the process of acquiring additional capacity from Metro, that acquisition has not yet been finalized. Based on GPU buildout projections, the City will be generating approximately 26.2 mgd of wastewater citywide by 2030 and would need to acquire additional 6.4 mgd of capacity rights by the year 2030 in order to meet citywide projected demand. Of this total, 1.57 mgd are projected to be generated in western Chula Vista, including a projected generation of 0.88 mgd for the UCSP Subdistricts Area. Therefore, impacts to the provision of sewer service are considered significant.</p>	<p>Development projects within the UCSP Subdistricts Area would require the approval of an Urban Core Development Permit established through the Design Review Process which would include the following mitigation measure to reduce wastewater impacts to below a level of significance:</p> <p>Mitigation Measure 5.12.2-1:</p> <p>Prior to the approval of subsequent individual development projects, project plans shall demonstrate that there is sufficient wastewater capacity available to serve the proposed project. Conditions of approval may require sewer capacity fees to be contributed to mitigate project-related impacts.</p>	Significant	5.12.2-1	Not Significant
<p>Solid Waste. The UCSP area is served by the Otay Landfill. Using the average rate of daily disposal and assuming the additional population of 18, 318 at buildout of the UCSP Subdistricts Area, and no additional recycling programs are implemented, the Otay Landfill has sufficient capacity to serve the UCSP for approximately 25 years, the horizon of the proposed UCSP. Since there is sufficient capacity to accommodate projected population at buildout of the UCSP, there is no significant impact to integrated waste management services.</p>	<p>No mitigation required.</p>	Not Significant	None Required	Not Significant

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MM = Mitigation Measures

SAM = Significance after Mitigation

**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>PUBLIC UTILITIES (cont.)</p> <p>Energy. Impacts to energy are considered significant because there is no long-term assurance that energy supplies will be available at buildout of the UCSP. Avoidance of energy impacts cannot be assured regardless of land use designation or population size. Although changes to planned land uses in the City would continue to implement the Energy Strategy Action Plan, San Diego Regional Energy Plan and Transit First Plan, implementation of the proposed land uses identified in the UCSP has the potential to result in significant impacts to nonrenewable and slowly renewable energy resources as a result of anticipated growth.</p> <p>The environmental sustainability measures of the UCSP(Chapter VI, G.) may further serve to reduce energy consumption associated with construction and occupation of structures within the UCSP area.</p>	<p>Mitigation Measure 5.12.4-1:</p> <p>The City shall continue to implement the Energy Strategy Action Plan that addresses demand side management, energy efficient and renewable energy outreach programs for businesses and residents, energy acquisition, power generation, and distributed energy resources and legislative actions, and continue to implement the CO₂ Reduction Plan to lessen the impacts on energy.</p> <p>While implementation of the above mitigation measure reduces energy related impacts, because there is no assurance that energy resources will be available to adequately serve the projected increase in population resulting from adoption of the UCSP, the impact remains significant.</p>	Significant	5.12.4-1	Significant

SBM = Significance before Mitigation

MM = Mitigation Measures

SAM = Significance after Mitigation

**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>HAZARDS/RISK OF UPSET</p> <p>Hazardous Materials Transport, Use Disposal or Release. Hazardous materials occur within the UCSP area and pose significant public health and safety risks during construction or long-term occupation of proposed development. Exposure to hazardous materials that exceed state and/or federal standards can occur through contact with contaminated soil or groundwater, through ingestion, skin contact or the inhalation of vapors or dust.</p> <p>An approximate total of 103 sites of potential hazardous concern have been identified from various federal, state and local databases as occurring within the Subdistricts Area. In addition, due to the presence of numerous pre-1960s structures in the area, there is a potential that during construction or demolition, workers may come into contact with hazardous building materials(asbestos and lead).</p> <p>Future development consistent with the proposed UCSP would result in significant impacts if such development allows greater contact between humans and hazards.</p>	<p>Mitigation Measure 5.13-1: Prior to approval of subsequent individual development projects, any project plans that propose land uses which use, transport, store, and dispose of hazardous materials shall be conducted in compliance with the relevant regulations of federal, state, and local agencies, including the EPA, California Department of Health Services (DHS), and California Department of Transportation.</p> <p>Mitigation Measure 5.13-2: A risk assessment shall be performed at all sites within the study area where contamination has been identified or is discovered during future construction activities, and at which soil is to be disturbed, to address risks posed by any residual contamination, and to establish appropriate mitigation measures (e.g., natural attenuation, active remediation, engineering controls) that would be protective of human health and the environment. All assessment and remediation activities shall be conducted in accordance with a Work Plan that is approved by the regulatory agency having oversight of the activities.</p>	Significant	5.13-1 and 5.13-2	Not Significant

SBM = Significance before Mitigation

MM = Mitigation Measures

SAM = Significance after Mitigation

**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>HAZARDS/RISK OF UPSET (cont.)</p> <p><i>Hazardous Emitters.</i> Due to the nature of historic and current land uses located throughout the UCSP area, there is a high potential for encountering hazardous materials sites identified on registers compiled pursuant to Government Code Section 65962.5. However, significant impacts to human health and the environment would be avoided through compliance with mandatory federal, state, and local regulations.</p> <p>State law requires the mapping of “general areas” within which hazardous facilities might be established. The GPU limited the location of potential emitters to general areas that coincide with industrial land use designations in order to avoid placement of potential emitters of hazardous or acutely hazardous materials or substances in close proximity to sensitive receivers.</p> <p>The proposed UCSP does not contain any designated industrial lands nor any mapped general areas. Therefore, impacts are not significant.</p>	<p>No mitigation required.</p>	<p>Not Significant</p>	<p>None Required</p>	<p>Not Significant</p>

SBM = Significance before Mitigation

MM = Mitigation Measures

SAM = Significance after Mitigation

**TABLE 1-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Impact	Mitigation	Proposed UCSP		
		SBM	MM	SAM
<p>HAZARDS/RISK OF UPSET (cont.)</p> <p>Emergency Response. There are no land uses proposed for the UCSP that would interfere with or impair implementation of an adopted emergency response or evacuation plan. In addition, the land uses identified in the proposed UCSP would not physically interfere with any known adopted emergency plans.</p> <p>As redevelopment proceeds in the UCSP Subdistricts Area, urbanization would intensify. As intensification increases, the potential for impacts of man-made or natural disaster could also increase. The ongoing implementation and updating of the DEH Emergency Response Management Program and Chula Vista Fire Code would assure adequate response to unforeseeable emergencies within the UCSP. Therefore, impacts to adopted emergency response or evacuation plans are self-mitigating and not significant.</p>	No mitigation required.	Not Significant	None Required	Not Significant

SBM = Significance before Mitigation

MM = Mitigation Measures

SAM = Significance after Mitigation

**TABLE 1-2
COMPARISON OF PROJECT ALTERNATIVES**

	No Project Alternative	Reduced Project Alternative	Automobile Priority Alternative
LAND USE			
Impacts to land use resulting from implementation of the No Project Alternative would be greater than those identified for the proposed UCSP because of inconsistency of existing Municipal Code Zoning with the adopted GPU. The current zoning conforms to the former General Plan, rather than the plan established by the currently adopted GPU. California law requires zoning ordinances to be consistent with the adopted GPU. Therefore, the No Project Alternative would result in the zoning for the Subdistricts Area of the UCSP being inconsistent with the GPU. This comprises a significant impact because the No Project Alternative conflicts with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project, which is a CEQA significance criterion.	Impacts to land use resulting from the Reduced Project Alternative would be the same as those identified for the proposed UCSP. The Reduced Project Alternative would implement the same zoning as the proposed UCSP, both of which conform to the adopted GPU as mandated by State Law. The proposed UCSP proposes changes in zoning to increase density and to allow for a greater degree of mixed-use development in key locations promoting pedestrian and transit oriented development. As identified in the Land Use Section 5.1 of this EIR and summarized in Table 1-1, future development's compliance with the UCSP's Land Use and Development Regulations and Development Design Guidelines, which are consistent with the adopted GPU, would ensure that no significant land use adjacency/community character and planning conformance impacts would result from implementation of the Reduced Project Alternative.	Effects to land use resulting from the Automobile Priority Alternative would be identical to those identified for the proposed UCSP. The Automobile Priority Alternative would implement the same zoning as the proposed UCSP. The zoning conforms to the adopted General Plan. Because the Automobile Priority Alternative would result in the same land use regulations as the proposed project, it would not result in the UCSP area being out of compliance with the GPU. Therefore, it would not conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project.	Future development's compliance with the UCSP's Land Use and Development Regulations and Development Design Guidelines, which are consistent with the adopted GPU, would ensure that no significant land use adjacency/community character and planning conformance impacts would result from implementation of the Automobile Priority Alternative.

**TABLE 1-2
COMPARISON OF PROJECT ALTERNATIVES
(continued)**

No Project Alternative	Reduced Project Alternative	Automobile Priority Alternative
<p>LANDFORM ALTERATION/AESTHETICS</p> <p>Impacts to aesthetics and visual character resulting from implementation of the No Project Alternative would be less than those identified for the proposed UCSP because of the lower densities, building heights and mass allowed with this alternative. Under the No Project Alternative, the visual character of the UCSP area pursuant to existing zoning would be similar to what exists today, and would represent a less intensified urban environment, with generally shorter building heights and less structural mass and density than the proposed UCSP. The No Project Alternative also differs substantially from the proposed UCSP in that it allows the continuance of single-use (instead of mixed-use) zoned parcels which would permit less residential development in the Subdistricts Area as a whole, by restricting residential uses to areas outlying the single-use commercially zoned corridors. The No Project Alternative could result in continued visual quality impacts associated with the growth permitted under the existing zoning in the absence of design guidelines for enhanced gateways, and other urban amenities as envisioned by the GPU and proposed by the UCSP.</p>	<p>Impacts to landform and aesthetics resulting from the Reduced Project Alternative would be less than those identified for the proposed UCSP. Adoption of the proposed UCSP would result in substantial changes to visual quality throughout the UCSP area through increased density, increased number of buildings and greater building heights and mass. By reducing the overall use of the area by 25 percent, these effects would be lessened in the Reduced Project Alternative. The development standards and design guidelines which outline allowable and recommended parameters for the development of the Subdistricts Area that are proposed as part of the proposed UCSP would also occur under this alternative. Compliance with these standards and guidelines ensure that development within the UCSP area would not result in architecture, urban design, landscaping, or landforms that negatively detract from the prevailing aesthetic character of the site or surrounding area. Because subsequent project specifics are not known, the extent to which they will conform to the UCSP development regulations and design guidelines cannot be determined. Without assurance of conformance with the UCSP, this impact will remain significant under the Reduced Project Alternative (and the proposed</p>	<p>Effects to visual character of the UCSP area resulting from the Automobile Priority Alternative would be identical to those identified for the proposed UCSP. Adoption of this alternative or the proposed UCSP would equally result in substantial intensification of existing land use and changes to visual quality throughout the UCSP area. Increased density, building heights and mass would accommodate the projected three-fold population increase for the UCSP Subdistricts Area. The existing visual character of low-rise single-use commercial and residential blocks of the UCSP would change to a mix of primarily low rise and mid-rise, with some high-rise, mixed-uses where commercial, office, and high-density residential uses would be integrated within the same structure or block. The development standards and design guidelines which outline allowable and recommended parameters for the development of the Subdistricts Area that are proposed as part of the UCSP would also occur under this alternative. Conditions of approval would be required on a project by project basis to ensure development is consistent with the UCSP development standards and design guidelines as provided in mitigation measures 5.2.5-1 and 5.2.5-2.</p>

**TABLE 1-2
COMPARISON OF PROJECT ALTERNATIVES
(continued)**

No Project Alternative	Reduced Project Alternative	Automobile Priority Alternative
<p>LANDFORM ALTERATION/AESTHETICS (cont.)</p>	<p>project). Therefore, conditions of approval would be required on a project by project basis to ensure development consistency with the UCSP as provided in mitigation measures 5.2.5-1 and 5.2.5-2.</p>	
<p>CULTURAL RESOURCES</p> <p>Impacts to cultural resources resulting from implementation of the No Project Alternative would be roughly equivalent to those identified for the proposed UCSP as both allow development over roughly the same geographic area. As with the proposed UCSP, implementation of the No Project Alternative would result in potentially significant cultural resources impacts. The UCSP area contains several known and designated historic architectural resources (sites and structures). In addition, the UCSP area potentially contains additional as yet unidentified historically significant resources. Demolition or substantial alteration of these historically significant architectural resources as a result of future development or redevelopment of the area (as allowed by existing underlying Redevelopment Plans and existing zoning) would comprise a significant cultural resources impact. In addition, although unlikely, future construction activities involving grading to depths equal to or greater than six feet may impact significant archaeological resources.</p>	<p>Impacts to cultural resources resulting from the Reduced Project Alternative would be the same as those identified for the proposed UCSP. As noted in Section 5.3.4 of this EIR, 11 buildings or sites within the UCSP Subdistricts Area are currently designated or eligible to be designated as historically significant. Demolition or substantial alteration of these buildings as a result of future development in accordance with the proposed UCSP would comprise a significant cultural resources impact. The Reduced Project Alternative does not change this potential. As with the proposed UCSP, the loss or substantial alteration of as-yet unknown historically significant architectural resources or prehistoric and historic archaeological resources due to development of the Reduced Project Alternative would comprise a significant cultural resources impact.</p> <p>Mitigation measures 5.3.5-1 through 5.3.5-5 detailed in</p>	<p>The Automobile Priority Alternative does not change the potential for impacts to cultural resources. Effects to cultural resources resulting from implementation of the Automobile Priority Alternative would be identical to those identified for the proposed UCSP. As with the proposed UCSP, the loss or substantial alteration of 11 identified historically significant architectural sites and as-yet unknown historically significant architectural resources or prehistoric and historic archaeological resources would comprise a significant cultural resources impact.</p> <p>Mitigation measures 5.3.5-1 through 5.3.5-5 (included in Table 1-1) would be required to mitigate impacts from the implementation of the Automobile Priority Alternative. If on a project-specific basis, these actions are demonstrated to be infeasible and a historically significant architectural resource would be demolished, documentation of the resource per HABS Level I may not be sufficient to reduce impacts to below a level of significance.</p>

**TABLE 1-2
COMPARISON OF PROJECT ALTERNATIVES
(continued)**

No Project Alternative	Reduced Project Alternative	Automobile Priority Alternative
CULTURAL RESOURCES (cont.)		
<p>Significant cultural resource impacts resulting from future development and redevelopment in accord with the No Project Alternative would be reduced below a level of significance through pre-construction monitoring, implementation of a construction mitigation program, and, for architectural resources, preservation, rehabilitation, relocation or historical documentation prior to demolition according to local, state, and federal standards.</p>	<p>Section 5.3.5 of this EIR and included in Table 1-1 would be required to mitigate these impacts from the implementation of the Reduced Project Alternative. Preservation, adaptive reuse, rehabilitation, or relocation of a listed/eligible historic resource consistent with the Secretary of the Interior's Standards and Guidelines would reduce impacts to said historical structures to below a level of significance. If on a project-specific basis, these actions are demonstrated to be infeasible and the resource would be demolished documentation, of the resource per HABS Level I may not be sufficient to reduce impacts to below a level of significance. In that case, impacts to architectural resources may be significant and unmitigated.</p>	<p>In that case, impacts to architectural resources may be significant and unmitigated.</p>
GEOLOGY AND SOILS		
<p>Impacts to geology and soils resulting from implementation of the No Project Alternative are roughly equivalent to those identified for the proposed UCSP as both allow development over roughly the same area. As with the UCSP, implementation of the No Project Alternative has the potential to result in significant impacts related to geology and soils. Future development would be exposed to geological hazards associated with seismic events, liquefaction, and expansive soils. Potential impacts resulting from geologic hazards would be reduced below a level of significance through project-specific design measures, including compliance</p>	<p>Geology and soils impacts resulting from the Reduced Project Alternative would be equivalent to those identified for the proposed UCSP. As with the proposed UCSP, implementation of the Reduced Project Alternative has the potential to result in significant impacts related to geology and soils. Future development would be exposed to geological hazards associated with seismic events, liquefaction, and expansive soils. Potential impacts resulting from geologic hazards would be reduced below a level of significance through project-specific design measures, including compliance</p>	<p>Impacts to geology and soils resulting from the Automobile Priority Alternative would be identical to those identified for the proposed UCSP. As with the proposed UCSP, implementation of the Automobile Priority Alternative has the potential to result in significant impacts related to geology and soils. Future development would be exposed to geological hazards associated with seismic events, liquefaction, and expansive soils. Potential impacts resulting from geologic hazards would be reduced below a level of significance through project-specific design measures,</p>

**TABLE 1-2
COMPARISON OF PROJECT ALTERNATIVES
(continued)**

No Project Alternative	Reduced Project Alternative	Automobile Priority Alternative
<p>GEOLOGY AND SOILS (cont.)</p> <p>of significance through project-specific design measures, including compliance with applicable building codes (e.g., Title 24 of the California Code of Regulations, and the UBC). Additionally, a comprehensive, site-specific soil and geologic evaluation would be conducted for all future hazards and site conditions.</p>	<p>with applicable building codes (e.g., Title 24 of the California Code of Regulations, and the UBC). Additionally, a comprehensive, site-specific soil and geologic evaluation shall be conducted for all future projects to determine potential hazards and site conditions (see mitigation measures 5.4.5-1 and 5.4.5-2 included in Table 1-1) and the Reduced Project Alternative both forecast development over the same area. As such, both the proposed UCSP and the Reduced Project Alternative have an equivalent potential for impacting geological resources.</p>	<p>including compliance with applicable building codes (e.g., Title 24 of the California Code of Regulations, and the UBC). Additionally, a comprehensive, site-specific soil and geologic evaluation shall be conducted for all future projects to determine potential hazards and site conditions (see mitigation measures 5.4.5-1 and 5.4.5-2 included in Table 1-1). The proposed UCSP and the Automobile Priority Alternative both forecast development over the same area. As such, both the proposed plan and the Automobile Priority Alternative have an equivalent potential for impacting geological resources.</p>
<p>PALEONTOLOGICAL RESOURCES</p> <p>Potentially significant paleontological resources impacts would result from implementation of the No Project Alternative and would be roughly equivalent to those identified for the proposed UCSP, because both allow development over the same geographic area. The UCSP area contains a large expanse of moderate paleontological resource sensitivity. Exposure or disturbance of soils greater than 5 feet in depth and at volumes in excess of 2000 cubic yards would require</p>	<p>As with the proposed UCSP, the Reduced Project Alternative would result in potentially significant paleontological resources impacts during exposure or disturbance of soils greater than 5 feet in depth and at volumes in excess of 2000 cubic yards. The potential to encounter paleontological resources does not change with the Reduced Project Alternative compared to the proposed UCSP. Effects to paleontological resources resulting from this alternative or the proposed UCSP</p>	<p>The Automobile Priority Alternative does not change the potential for impacts to paleontological resources compared to the proposed UCSP. Effects to paleontological resources resulting from this alternative would be identical to those identified for the proposed UCSP. For both the proposed UCSP and Automobile Priority Alternative, exposure or disturbance of soils greater than 5 feet in depth and at volumes in excess of 2000 cubic yards would require mitigation.</p>

**TABLE 1-2
COMPARISON OF PROJECT ALTERNATIVES
(continued)**

No Project Alternative	Reduced Project Alternative	Automobile Priority Alternative
<p>PALEONTOLOGICAL RESOURCES (cont.)</p> <p>mitigation. These grading thresholds are likely to be exceeded under the No Project Alternative as existing buildings are replaced or redeveloped over time in accordance with underlying Redevelopment Plans and existing zoning. This comprises a significant paleontological impact.</p> <p>Potential paleontological resource impacts resulting from this alternative would be reduced below a level of significance through pre-construction monitoring and implementation of a construction mitigation program.</p>	<p>would be identical. For both the Reduced Project Alternative and proposed UCSP, potentially significant paleontological impacts would be mitigated through pre-construction monitoring and implementation of a construction mitigation program as identified in mitigation measure 5.5-1 as identified in Table 1-1 and Section 5.5 of this EIR.</p>	<p>Mitigation measure 5.5-1 identified in Section 5.5 of this EIR and summarized in Table 1-1 would be required to mitigate potentially significant paleontological impacts associated with implementation of the Automobile Priority Alternative. This mitigation measure includes pre-construction monitoring and implementation of a construction mitigation program on a project-specific basis.</p>
<p>WATER RESOURCES/WATER QUALITY</p> <p>Impacts to hydrology and water quality resulting from implementation of the No Project Alternative would be less than those identified for the proposed UCSP. As with the proposed UCSP, implementation of the No Project Alternative has the potential to result in significant impacts related to water resources and quality. Future development within the Subdistricts Area would increase runoff by increasing the impermeable surface area. Future development that intensifies land use over existing conditions, would increase direct runoff to drainage basins, municipal storm water systems, and ultimately to receiving surface and ground water bodies. This runoff will likely contain typical urban runoff pollutants such as sediment, pathogens, heavy metals, petroleum products, nutrients, and trash.</p>	<p>Impacts to hydrology and water quality resulting from the Reduced Project Alternative would be roughly the same as those identified for the proposed UCSP. As with the proposed UCSP, implementation of the Reduced Project Alternative has the potential to result in significant impacts related to water resources and water quality. Future development would increase runoff by increasing the impermeable surface area. The proposed UCSP and the Reduced Project Alternative both forecast development over roughly the same area. As such, both the proposed UCSP and the Reduced Project Alternative have roughly equivalent potential for impacting water quality. Significant impacts to water quality resulting from future development would be mitigated through compliance with all applicable federal, state and</p>	<p>Hydrology and water quality effects resulting from the Automobile Priority Alternative would be identical to those identified for the proposed UCSP. As with the proposed UCSP, implementation of the Automobile Priority Alternative has the potential to result in significant impacts related to water resources and water quality. Future development would increase runoff by increasing the impermeable surface area in the City. Adherence to water quality control measures required under the San Diego County Municipal Permit would avoid potential water quality impacts. The proposed UCSP and the Automobile Priority Alternative both forecast development over the same area. As such, both the proposed plan and the Automobile Priority Alternative have an equivalent potential for impacting water quality.</p>

**TABLE 1-2
COMPARISON OF PROJECT ALTERNATIVES
(continued)**

No Project Alternative	Reduced Project Alternative	Automobile Priority Alternative
WATER RESOURCES/WATER QUALITY (cont.)		
	<p>local laws and regulations regarding water quality (e.g., JURMP, SUSMP, NPDES, SWPP, and City Development and Redevelopment Projects Storm Water Manual) as identified in measures 5.7-1 through 5.7-4 as shown in Table 1-1.</p>	
TRANSPORTATION		
<p>Impacts to transportation resulting from implementation of the No Project Alternative would be less than those identified for the proposed UCSP. As with the proposed UCSP, implementation of the No Project Alternative has the potential to result in significant traffic and circulation impacts. Future development within the Subdistricts Area in accordance with existing zoning would potentially allow additional commercial uses, some residential development and would not provide for the benefits of mixed use and compact development which concentrates development at transit stations, and reduces long commute trips.</p> <p>Currently, all existing roadway segments and all except three existing intersections within the UCSP area operate at acceptable levels of service.</p>	<p>Impacts to transportation resulting from the Reduced Project Alternative would potentially be less than those identified for the proposed UCSP. As with the proposed UCSP, implementation of the Reduced Project Alternative has the potential to result in significant traffic and circulation impacts. Future development within the Subdistricts Area in accordance with the proposed UCSP would result in two roadway segments and 19 intersections dropping below acceptable levels of service. While not quantifiable given lack of available data, it can be assumed that the Reduced Project Alternative, which comprises a 25 percent reduction of the proposed UCSP, would also result in several roadway segments and intersections dropping below acceptable levels of service. As such, both the UCSP and the Reduced Project Alternative would result in significant traffic impacts; however, the Reduced Project Alternative would likely have</p>	<p>Transportation impacts resulting from the Automobile Priority Alternative would be less than those identified for the proposed UCSP. The Automobile Priority Alternative would mitigate impacts to the roadway segment of Third Avenue between E and G Streets and the following three intersections by resulting in improvements that would allow them to operate at LOS D or better.</p> <ul style="list-style-type: none"> • Broadway/H Street • Hilltop Drive/H Street • Third Avenue/J Street <p>With inclusion of the improvements identified for this alternative, there would be no significant impacts to UCSP intersections. All mitigation measures identified for the proposed UCSP would be required in conjunction with the Automobile Priority Alternative.</p>

**TABLE 1-2
COMPARISON OF PROJECT ALTERNATIVES
(continued)**

No Project Alternative	Reduced Project Alternative	Automobile Priority Alternative
TRANSPORTATION (cont.)		
<p>The potential increase in residential and commercial population of the UCSP area, as allowed by existing zoning, would likely result in several roadway segments and intersections decreasing in levels of service. As such, both the UCSP and the No Project Alternative would result in significant traffic impacts; however, the No Project Alternative would likely have less of an impact in terms of number of roadways and intersections affected.</p> <p>In regard to future demands for public transit services, a similar conclusion can be drawn. While both the proposed UCSP and the No Project Alternative would allow future development that would place greater demand on local and regional transit services, the lesser number of allowable residential units and commercial units resulting from the Reduced Project Alternative would create less of a future impact on area roadways and intersections and less of a demand on public transit services. In either case, significant impacts to transportation would require mitigation in the form of roadway and intersection improvements.</p>	<p>less of an impact in terms of number of roadways and intersection affected.</p> <p>In regard to future demands for public transit services, a similar conclusion can be drawn. While both the proposed UCSP and the Reduced Project Alternative would allow future development that would place greater demand on local and regional transit services, the lesser number of allowable residential units and commercial units resulting from the Reduced Project Alternative would create less of a future impact on area roadways and intersections and less of a demand on public transit services. In either case, significant impacts to transportation would require mitigation in the form of roadway and intersection improvements.</p>	<p>Additional traffic improvements to mitigate decline in the LOS for these intersections and street segment was not included in the proposed UCSP because of conflicts with plan objectives and right-of-way constraints. In order to fully mitigate traffic impacts within the Subdistricts Area, the UCSP would have had to implement traffic mitigation measures that conflict with the plan's objectives to enhance pedestrian movement. The acquisition of additional of right-of-way was not considered feasible due to the existing built condition at the affected intersections.</p>

**TABLE 1-2
COMPARISON OF PROJECT ALTERNATIVES
(continued)**

No Project Alternative	Reduced Project Alternative	Automobile Priority Alternative
AIR QUALITY		
<p>Air quality emissions resulting from implementation of the No Project Alternative would be potentially greater than those identified for the proposed UCSP. As identified in the GPU EIR, a comparative assessment of the anticipated air emissions resulting from Year 2030 buildout of the former General Plan (which the existing Municipal Code Zoning implements) and the recently adopted GPU concluded that with the exception of reactive organic gases, the emissions resulting from the adopted GPU, including NO_x compounds, are anticipated to be less than those that would occur under the former General Plan. In addition, the former General Plan shows an increase in PM₁₀ and SO_x relative to the existing condition.</p> <p>Air quality impacts resulting from inconsistency with the SDAB RAQS would be less with implementation of the No Project Alternative than with implementation of the proposed UCSP.</p>	<p>Air quality impacts resulting from the Reduced Project Alternative would be less than those identified for the proposed UCSP. The results of a GPU EIR comparative assessment of anticipated air emissions resulting from buildout of the GPU and various alternative scenarios, including a Reduced Project Alternative, concluded that with the exception of reactive organic gases, the emissions resulting from the Reduced Project Alternative would be less than those that would occur under the proposed UCSP.</p> <p>However, because the region is not in attainment for ozone and PM_{2.5} and is unclassifiable for PM₁₀, there is the potential for future projects that would conform to the Reduced Project Alternative to contribute to cumulatively considerable emissions should multiple projects be implemented simultaneously. Cumulatively significant impacts associated with sensitive receptors adjacent to the Interstate 5 Freeway would also occur under this</p>	<p>Air quality impacts resulting from the Automobile Priority Alternative would be identical to those identified for the proposed UCSP. Because there is a reasonable potential for multiple projects occurring at the same time, construction impacts are significant under both the Automobile Priority Alternative and proposed UCSP. Furthermore, because the Automobile Priority Alternative and the proposed UCSP are not consistent with the growth assumptions of the RAQS, implementation of this alternative would not comply with the SANDAG TCM Plan and, therefore, would result in significant air quality impacts. Cumulatively significant impacts associated with sensitive receptors adjacent to the Interstate 5 Freeway would also remain under this alternative. As with the proposed UCSP, mitigation for mobile source reductions of diesel particulates is the responsibility of state and federal agencies, therefore the impact would be significant and unmitigated.</p>

**TABLE 1-2
COMPARISON OF PROJECT ALTERNATIVES
(continued)**

No Project Alternative	Reduced Project Alternative	Automobile Priority Alternative
<p>AIR QUALITY (cont.)</p> <p>Because the No Project Alternative is consistent with the growth assumptions of the RAQS, implementation of the No Project Alternative would comply with the SANDAG TCM Plan and, therefore, would not result in significant air quality impacts. The proposed UCSP and the GPU is not in compliance with the SANDAG TCM Plan and as such is considered a significant impact. The No Project Alternative conforms to the program and does not represent a significant air plan impact.</p>	<p>alternative (and the proposed UCSP). However, given that the Reduced Project Alternative comprises a 25 percent reduction of the proposed UCSP and by extension 25 percent fewer units, the air quality impacts to the Reduced Project Alternative would be potentially less than those incurred under the proposed UCSP. As with the proposed UCSP, mitigation for mobile source reductions of diesel particulates is the responsibility of state and federal agencies, therefore the impact would be significant and unmitigated.</p>	<p>Because the Reduced Project Alternative is consistent with the adopted GPU and not the former General Plan, which formed the basis of the growth assumptions of the RAQS, implementation of the Reduced Project Alternative would not comply with the SANDAG TCM Plan and, therefore, would result in significant air quality impacts.</p>

**TABLE 1-2
COMPARISON OF PROJECT ALTERNATIVES
(continued)**

No Project Alternative	Reduced Project Alternative	Automobile Priority Alternative
<p>NOISE</p> <p>Noise impacts resulting from implementation of the No Project Alternative would be less than those identified for the proposed UCSP. As with the proposed UCSP, development of the No Project Alternative has the potential to result in significant noise impacts. Development under the No Project Alternative, as with the proposed UCSP, would result in an increase in allowable density along highways and major arterials and adjacent to rail, thereby exposing potentially sensitive receptors (residential and park users) to noise levels in excess of applicable thresholds. However, given that the No Project Alternative allows less of an increase in allowable development compared to the three-fold increase allowed under the proposed UCSP, the noise impacts resulting from the No Project Alternative would be less than those incurred under the proposed UCSP. The proposed UCSP also allows a greater number of sensitive receptors to be placed adjacent to the San Diego Trolley line and Interstate 5, through increased density and building heights in these areas over existing zoning.</p>	<p>Noise impacts resulting from implementation of the Reduced Project Alternative would potentially be less than those identified for the proposed UCSP. As with the proposed UCSP, development of the Reduced Project Alternative has the potential to result in significant noise impacts. Development under the Reduced Project Alternative, as with the proposed UCSP, would result in an increase in allowable density along highways and major arterials and adjacent to rail, thereby exposing potentially sensitive receptors (residential and park users) to noise levels in excess of applicable thresholds. However, given that the Reduced Project Alternative comprises a 25 percent reduction of the proposed UCSP and by extension 25 percent fewer residents, the noise impacts resulting from the Reduced Project Alternative would be potentially less than those incurred under the proposed UCSP. As with the proposed UCSP, all future projects allowed in the Reduced Project Alternative with the potential to be exposed to noise in excess of the specified limits shall be required to complete applicable exterior and interior noise analyses and demonstrate to the satisfaction of the City Planning and Building Director, Community Development and Building Official, that project-specific design includes measures to reduce any noise impacts to below a level of significance.</p>	<p>Noise effects resulting from the Automobile Priority Alternative would be identical to those identified for the proposed UCSP. As with the proposed UCSP, development of the Automobile Priority Alternative has the potential to result in significant noise impacts. Development under the Automobile Priority Alternative would result in an increase in allowable density along highways and major arterials, and adjacent to rail. All future projects with the potential to be exposed to noise in excess of the specified limits would be required to complete applicable exterior and interior noise analyses and demonstrate to the satisfaction of the City Planning and Building Director, Community Development and Building Official, that project-specific design includes measures to reduce any noise impacts to below a level of significance.</p>

**TABLE 1-2
COMPARISON OF PROJECT ALTERNATIVES
(continued)**

No Project Alternative	Reduced Project Alternative	Automobile Priority Alternative
NOISE (cont.)		
As with the proposed UCSP, all future projects with the potential to be exposed to noise in excess of specified limits would be required to complete applicable exterior and interior noise analyses and demonstrate to the satisfaction of the City Planning and Building Director, Community Development Director, or Building Official, that project-specific design includes measures to reduce any noise impacts to below a level of significance.	Development Director, or Building Official, that project-specific design includes measures to reduce any noise impacts to below a level of significance.	

PUBLIC SERVICES AND UTILITIES

Impacts to public services and utilities resulting from implementation of the No Project Alternative would be less than those identified for the proposed UCSP. The No Project Alternative would allow an increase in the residential and commercial population of the UCSP Subdistricts Area. This increase in population and land use intensity would result in an associated increase in demands for law enforcement, fire protection, educational services, libraries, and parks, as well as increased demands on supply and distribution	Impacts to public services and utilities resulting from the Reduced Project Alternative would be less than those identified for the proposed UCSP. The Reduced Project Alternative represents a decrease in potential population relative to the proposed UCSP, thus reducing the demand for services and utilities. While the Reduced Project Alternative would reduce the demand for public services and utilities resources compared to the proposed UCSP, the same approach to upgrading facilities would need to be implemented.	Implementation of the Automobile Priority Alternative would result in significant demands for public services and utilities identical to those identified for in the proposed UCSP. The Automobile Priority Alternative does not change the projected population relative to the proposed UCSP. As such, it does not reduce the demand for services and utilities.
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**TABLE 1-2
COMPARISON OF PROJECT ALTERNATIVES
(continued)**

No Project Alternative	Reduced Project Alternative	Automobile Priority Alternative
<p>PUBLIC SERVICES AND UTILITIES (cont.)</p> <p>of potable water, wastewater, solid waste and energy utilities. Impacts to the provision of these public services and utilities would be significant if provision of additional facilities, personnel or other resources does not coincide with the anticipated population growth and increased demand for these services and utilities. The No Project Alternative represents a decrease in potential population relative to the proposed UCSP, thus reducing the future demand for services and utilities.</p>	<p>The City of Chula Vista currently implements a public facilities development impact fee program that requires all new development within the City to contribute their fair share to the funding and construction of needed public infrastructure improvements. In addition, the City imposes various other levies (recreational facilities development impact fees, statutory school impacts fees) and programs (Growth Management Ordinance, Capital Improvement Program) that annually review, reprioritize and schedule needed citywide public infrastructure. In addition, the proposed UCSP and Reduced Project Alternative include a Facilities Implementation Analysis that evaluates ongoing, long-term improvement projects and determines whether long-term projects revenues are sufficiently aligned with long-term potential costs of public infrastructure. Subsequent projects developed under the Reduced Project Alternative (or the proposed UCSP) would be subject to the payment of applicable development impact fees at the rate in effect at the time building permits are issued in order to mitigate significant impacts to public services and utilities.</p>	<p>The Automobile Priority Alternative would implement the same approach to upgrading facilities as identified in the proposed UCSP. Subsequent individual projects developed under the Automobile Priority Alternative (or the proposed UCSP) would be subject to the payment of applicable development impact fees at the rate in effect at the time building permits are issued in order to mitigate significant impacts to public services and utilities, as outlined in mitigation measures 5.11.1-1, 5.11.1-2, 5.11.1-3, 5.11.2-1, 5.11.2-2, 5.11.2-3, 5.11.3-1, 5.11.4-1, 5.11.5-1, 5.12.2-1, and 5.12.4-1 as described in Table 1-1.</p>
<p>The City of Chula Vista currently implements a public facilities development impact fee program that requires all new development within the City to contribute their fair share to the funding and construction of needed public infrastructure improvements. In addition, the City imposes various other levies (recreational facilities development impact fees, statutory school impacts fees) and programs (Growth Management Ordinance, Capital Improvement Program) that annually review, reprioritize and schedule needed citywide public infrastructure. In addition, the proposed UCSP and Reduced Project Alternative include a Facilities Implementation Analysis that evaluates ongoing, long-term improvement projects and determines whether long-term projects revenues are sufficiently aligned with long-term potential costs of public infrastructure. Subsequent projects developed under the Reduced Project Alternative (or the proposed UCSP) would be subject to the payment of applicable development impact fees at the rate in effect at the time building permits are issued in order to mitigate significant impacts to public services and utilities.</p>	<p>The City of Chula Vista currently implements a public facilities development impact fee program that requires all new development within the City to contribute their fair share to the funding and construction of needed public infrastructure improvements. In addition, the City imposes various other levies (recreational facilities development impact fees, statutory school impacts fees) and programs (Growth Management Ordinance, Capital Improvement Program) that annually review, reprioritize and schedule needed citywide public infrastructure. In addition, the proposed UCSP and Reduced Project Alternative include a Facilities Implementation Analysis that evaluates ongoing, long-term improvement projects and determines whether long-term projects revenues are sufficiently aligned with long-term potential costs of public infrastructure. Subsequent projects developed under the Reduced Project Alternative (or the proposed UCSP) would be subject to the payment of applicable development impact fees at the rate in effect at the time building permits are issued in order to mitigate significant impacts to public services and utilities.</p>	<p>The City of Chula Vista currently implements a public facilities development impact fee program that requires all new development within the City to contribute their fair share to the funding and construction of needed public infrastructure improvements. In addition, the City imposes various other levies (recreational facilities development impact fees, statutory school impacts fees) and programs (Growth Management Ordinance, Capital Improvement Program) that annually review, reprioritize and schedule needed citywide public infrastructure. In addition, the proposed UCSP and Reduced Project Alternative include a Facilities Implementation Analysis that evaluates ongoing, long-term improvement projects and determines whether long-term projects revenues are sufficiently aligned with long-term potential costs of public infrastructure. Subsequent projects developed under the Reduced Project Alternative (or the proposed UCSP) would be subject to the payment of applicable development impact fees at the rate in effect at the time building permits are issued in order to mitigate significant impacts to public services and utilities.</p>

**TABLE 1-2
COMPARISON OF PROJECT ALTERNATIVES
(continued)**

No Project Alternative	Reduced Project Alternative	Automobile Priority Alternative
<p>POPULATION AND HOUSING</p> <p>Population and housing impacts resulting from implementation of the No Project Alternative would be equivalent to those identified for the proposed UCSP. As with the proposed UCSP, development of the No Project Alternative would not result in significant population and housing impacts. While the proposed UCSP (and the No Project Alternative) would induce population growth and allow new development and redevelopment to accommodate growth that is already planned to occur locally. Development in accordance with the existing zoning of the No Project Alternative would not displace substantial numbers of existing housing or people necessitating the construction or replacement of housing elsewhere. Housing that may be removed by future individual projects (due to construction/redevelopment) would not necessitate the construction of housing elsewhere because the overall number of housing units allowed by the Project would be sufficient within the UCSP area to accommodate the affected population.</p>	<p>Impacts to population and housing resulting from the Reduced Project Alternative would be the same as those identified for the proposed UCSP. As with the proposed UCSP, development of the Reduced Project Alternative would not result in significant population and housing impacts. While the Reduced Project Alternative would also induce substantial population growth it would allow new development and redevelopment that would accommodate growth that is already planned to occur locally. Development in accordance with the Reduced Project Alternative would not displace substantial numbers of existing housing or people necessitating the construction or replacement of housing elsewhere. Housing that may be removed by future individual projects would not necessitate the construction of housing elsewhere because the overall number of housing units allowed by the Reduced Project Alternative would be sufficient within the UCSP area to accommodate the affected population. The proposed UCSP and the Reduced Project Alternative both forecast development over roughly the same area. As such, both the</p>	<p>Impacts to population and housing resulting from the Automobile Priority Alternative would be identical to those identified for the proposed UCSP. As with the proposed UCSP, development of the Automobile Priority Alternative would not result in significant population and housing impacts. While the Automobile Priority Alternative and the proposed UCSP would induce substantial population growth they would allow new development and redevelopment that would accommodate growth that is already planned to occur locally. Development in accordance with the Automobile Priority Alternative and the proposed UCSP would not displace substantial numbers of existing housing or people necessitating the construction or replacement of housing elsewhere. Housing that may be removed by future individual projects would not necessitate the construction of housing elsewhere because the overall number of housing units allowed by the proposed UCSP and Automobile Priority Alternative would be sufficient within the UCSP area to accommodate the affected population. Both the UCSP and the Automobile Priority Alternative have an equivalent potential for affecting population and housing, with both scenarios resulting in effects considered to be not significant.</p>

**TABLE 1-2
COMPARISON OF PROJECT ALTERNATIVES
(continued)**

No Project Alternative	Reduced Project Alternative	Automobile Priority Alternative
<p>POPULATION AND HOUSING (cont.)</p> <p>The proposed UCSP and the No Project Alternative both allow development over the same geographic area. As such, both the UCSP and the No Project Alternative have an equivalent potential for affecting population and housing, with both scenarios resulting in effects considered to be not significant.</p>	<p>proposed UCSP and the Reduced Project Alternative have a roughly equivalent potential for affecting population and housing, with both scenarios resulting in effects considered to be not significant.</p>	
<p>HAZARDS/RISK OF UPSET</p> <p>Hazardous materials impacts resulting from implementation of the No Project Alternative would be the same as those identified for the proposed UCSP. The UCSP area contains numerous known and listed hazardous sites of potential environmental concern. Approximately 103 sites of potential environmental concern were identified in the UCSP Subdistricts Area through recent database research. In addition, the UCSP Subdistricts Area contains several older buildings that may contain hazardous building materials (lead, asbestos, PCBs) that could be exposed during demolition or renovation. Future</p>	<p>Hazardous materials impacts resulting from the Reduced Project Alternative would be roughly identical to those identified for the proposed UCSP. The UCSP area contains numerous known and listed hazardous sites of potential environmental concern. Approximately 103 sites of potential environmental concern were identified in the UCSP Subdistricts Area through recent database research. In addition, the UCSP Subdistricts Area contains several older buildings that may contain hazardous building materials (lead, asbestos, PCBs) that could be exposed during demolition or renovation. The proposed UCSP and the Reduced</p>	<p>Effects from hazardous materials resulting from the Automobile Priority Alternative would be identical to those identified for the proposed UCSP. The UCSP area contains numerous known and listed hazardous sites of potential environmental concern. Approximately 103 sites of potential environmental concern were identified in the UCSP Subdistricts Area through recent database research. In addition, the UCSP Subdistricts Area contains several older buildings that may contain hazardous building materials (lead, asbestos, PCBs) that could be exposed during demolition or renovation. Future development consistent with the Automobile</p>

**TABLE 1-2
COMPARISON OF PROJECT ALTERNATIVES
(continued)**

No Project Alternative	Reduced Project Alternative	Automobile Priority Alternative
<p>HAZARDS/RISK OF UPSET (cont.)</p> <p>development consistent with the No Project Alternative, as with the proposed UCSP, may result in significant impacts if such development allows greater contact between humans and hazards. In either case, significant hazardous materials impacts would be similarly mitigated through compliance with all applicable federal, state and local laws and regulations regarding hazardous materials siting, assessment and remediation. In addition, a risk assessment would be required at all sites within the UCSP area where contamination has been identified or is discovered during future construction activities; and a hazardous building materials survey would be conducted at all buildings in the UCSP area prior to demolition or renovation activities.</p>	<p>Project Alternative both forecast development over roughly the same area. As such, both the proposed plan and the Reduced Project Alternative have an equivalent potential for encountering hazardous materials.</p> <p>Future development consistent with the Reduced Project Alternative, as with the proposed UCSP, may result in significant impacts if such development allows greater contact between humans and hazards. In either case, significant hazardous materials impacts would be similarly mitigated through compliance with all applicable federal, state and local laws and regulations regarding hazardous materials siting, assessment and remediation. In addition, a risk assessment would be required at all sites within the UCSP area where contamination has been identified or is discovered during future construction activities; and a hazardous building materials survey would be conducted at all buildings in the UCSP area prior to demolition or renovation activities.</p>	<p>Priority Alternative, as with the proposed UCSP, may result in significant impacts if such development allows greater contact between humans and hazards. In either case, significant hazardous materials impacts would be similarly mitigated through compliance with all applicable federal, state and local laws and regulations regarding hazardous materials siting, assessment and remediation. In addition, a risk assessment would be required at all sites within the UCSP area where contamination has been identified or is discovered during future construction activities; and a hazardous building materials survey would be conducted at all buildings in the UCSP area prior to demolition or renovation activities (see mitigation measures 5.13-1 and 5.13-2 in Table 1-1).</p>

2.0 Introduction

This Program Environmental Impact Report (EIR) for the proposed City of Chula Vista Urban Core Specific Plan (UCSP) has been prepared in compliance with the California Environmental Quality Act (CEQA) and Guidelines (Public Resources Code Section 21000, et seq. and California Code of Regulations, Title 14, Section 15000, et seq.). The purpose of this Program EIR is to address the potential environmental effects of, and provide CEQA documentation for, the implementation of the UCSP that proposes to govern new development and redevelopment of the Chula Vista urban core. This document is intended to be used by the City of Chula Vista, as Lead Agency, in approving the proposed UCSP. In addition, as a Program EIR, the document is intended to be used by the City of Chula Vista as well as the Chula Vista Redevelopment Corporation and other Responsible Agencies, when taking action on subsequent permits to allow development within the UCSP area in accordance with the proposed UCSP.

2.1 Proposed Project

The UCSP has been prepared as a neighborhood level planning document which provides updated zoning regulations, development standards, and design guidelines in order to implement the planned land uses envisioned in the City's General Plan Update (GPU) for the traditional downtown area of Chula Vista. In addition to being a land use regulatory document, the UCSP also outlines the framework for the provision of urban amenities and other public improvements associated with anticipated development pursuant to the UCSP. The planning horizon for the UCSP projects through the year 2030, with provisions for periodic evaluation of progress in meeting plan goals.

Maps contained in the UCSP (and replicated in this EIR) show the boundaries of a 1700-acre Study Area and a 690 gross-acre UCSP Subdistricts Area. The regulatory provisions of the UCSP described above (i.e. new zoning, development standards, and design guidelines) apply only to the Subdistricts Area of the UCSP. Existing zoning and land use regulations will not be changed in the surrounding Study Area. The Subdistricts Area was a focus of the GPU's "Areas of Change," having been determined to be an area most in need of revitalization. For this reason, it is the area where redevelopment and new infill development is expected to occur and subsequently the area within which the new zoning regulations and development design guidelines of the UCSP are proposed. The UCSP Subdistricts Area encompasses the commercial corridors along Third Avenue between roughly E and L Streets, Broadway between C and L Streets, and E and H Streets between Del Mar Avenue (just east of Third Avenue) and Interstate 5. Multi-family residential areas are also included in the Subdistricts Area and are concentrated west of Broadway between D and I Streets.

Existing zoning and land use regulations will not change in the surrounding UCSP Study Area. This area was determined to consist largely of stable residential neighborhoods that would not transition within the 25-year planning horizon of the UCSP, and was thus excluded from the new zoning and land use regulatory provisions of the UCSP. However, some provisions for urban amenities and other public improvements in the UCSP will apply to the Study Area, outside of the Subdistricts Area. The potential effects of these provisions are included in Chapter 5, Environmental Impact Analysis. The 1700-acre UCSP Study Area extends generally from Interstate 5 on the west, Del Mar Avenue on the east, C Street on the north, and L Street on the South.

Pertinent content of the UCSP is summarized in Chapter 3 of this EIR. A complete copy of the Draft UCSP and appendices can be viewed at the City of Chula Vista Community Development Department at 276 Fourth Avenue, the Chula Vista Civic Center Library at 365 F Street in the City of Chula Vista, and on the City of Chula Vista's website at www.ci.chula-vista.ca.us.

Pursuant to CEQA Guidelines, Section 15147, the appendices to this EIR are bound under separate cover and are readily available for review in their entirety at the City of Chula Vista Community Development Department at 276 Fourth Avenue, the Chula Vista Civic Center Library at 365 F Street in the City of Chula Vista, and on the City of Chula Vista's website at www.ci.chula-vista.ca.us.

Chula Vista General Plan Update

The Chula Vista General Plan Update (GPU) defines the framework by which the City's physical and economic resources are to be managed and used in the future. The GPU guides future development within the existing City limits, and also addresses areas within the City's Sphere of Influence and other portions of the GPU area beyond the City limits. The GPU is the basis for all future development; therefore, any decision by the City affecting land use and development must be consistent with the GPU. This includes proposed development projects. An action, program, or project would be considered consistent with the GPU if, considering all of its aspects, it will further the objectives and policies of the GPU and not obstruct their attainment.

During the last several years the City of Chula Vista was in the process of updating the City's 1989 General Plan. The main focus of the 1989 General Plan was on the newly annexed and developing eastern portions of the City. The recent General Plan Update (adopted December 2005) has instead focused primarily on the currently developed areas of the City, in particular the western portions of the City. As such, the planning effort was confronted with balancing "how" the City can grow over the next 25 years given the continued growth projections with "where" given the numerous established stable neighborhoods. This challenge was seen as an opportunity to use the key, foundational principles found in smart growth strategies relative to urban revitalization and apply them to areas that have experienced recent decline or underutilization.

The GPU is based on many of the common elements and concepts of smart growth such as:

- Provide a mix of compatible land uses
- Take advantage of compact building design
- Create a range of housing opportunities and choices
- Create walkable neighborhoods
- Strengthen and direct development towards existing communities
- Provide a variety of transportation choices

The GPU is organized into four large planning areas: Northwest Southwest, Bayfront, and East. Section 9 of the Land Use and Transportation Element of the GPU includes specific goals and objectives for the Northwest Planning Area. Within the Northwest Planning Area, the GPU identifies the Urban Core Subarea which comprises the central commercial area of the City. The Urban Core Subarea contains a number of smaller planning districts including the Downtown Third Avenue District, H Street Office District, Interstate 5 District, Mid Broadway District, and Mid Third Avenue District. For each of these planning districts a series of objectives is presented.

The geographic extent of the UCSP correlates to these planning districts and provides regulations, standards and design guidelines to implement the GPU policies and objectives through future private and public projects, improvements, and programs.

2.1.1 Urban Core Specific Plan

The UCSP has been prepared as an implementing document for future land uses, public improvements, and programs as provided for in the GPU. In order to implement the vision for the urban core established by the GPU, it was recognized that existing zoning for the urban core needed “re-tooling.” The 30+-year-old zoning regulations are not designed to facilitate the variety of living, employment, and service choices envisioned by the GPU and quite commonplace in the twenty-first century.

The new zoning regulations would apply to the Subdistricts Area of the UCSP which encompasses three districts: the Village, the Urban Core, and the Corridors. These three districts correlate to the GPU planning districts described above in Section 2.1.1. The three UCSP districts have been refined into 26 smaller planning subdistricts each with proposed permitted land uses, land use mixes, development regulations, and standards. The new zoning regulations would replace existing Municipal Code zoning classifications for the UCSP Subdistricts Area and would introduce new zoning classifications for mixed-use (retail/office), mixed-use with residential, and urban core residential (high-density residential) as anticipated by the GPU.

In addition to establishing permitted land uses, development regulations, and standards through new zoning, the UCSP also provides development design guidelines for the Subdistricts Area which further define the type and amount of development permitted. The UCSP also establishes the City's standards for that development, including provision of services, parks and open space, and major improvements to be provided by individual projects as they are proposed.

The proposed UCSP is based on the objectives provided in the GPU and provides further detail on how these objectives will be implemented. The UCSP contains all the mandatory elements identified in Government Code Section 65451 regarding Specific Plan content and includes the following Chapters:

Chapter I: Executive Summary

Chapter II: Introduction and Background

Chapter III: Vision

Chapter IV: Existing Conditions

Chapter V: Mobility

Chapter VI: Land Use and Development Regulations

Chapter VII: Development Design Guidelines

Chapter VIII: Public Realm Design Guidelines

Chapter IX: Infrastructure and Public Facilities

Chapter X: Plan Implementation and Community Benefits Program

Chapter XI: Plan Administration

For purposes of the environmental analysis, the most pertinent chapters which provide regulatory provisions or design guidance for future public and private improvements and development are Chapters V – VIII and Chapters X and XI. All chapters of the UCSP are summarized in the Project Description of this EIR (see Chapter 3). A complete copy of the Draft UCSP and appendices can be viewed at the City of Chula Vista Community Development Department at 276 Fourth Avenue, the Chula Vista Civic Center Library at 365 F Street in the City of Chula Vista, and on the City of Chula Vista's website at www.ci.chula-vista.ca.us.

2.2 CEQA Requirements

This EIR has been prepared in accordance with the requirements of the City of Chula Vista Environmental Review Procedures and complies with all criteria, standards, and procedures of CEQA and the CEQA Guidelines.

2.2.1 Scope of the EIR

The scope of analysis of this EIR was determined by the City of Chula Vista Community Development Department as a result of the circulation of a Notice of Preparation (NOP) on August 18, 2005 and a scoping meeting held on September 8, 2005 at the City of Chula Vista. The City's NOP, associated responses, and comments made during the scoping meeting are included in Appendix A of this document.

Based on the responses to the NOP, comments made during the scoping meeting, and extensive review of relevant past environmental documents and of the project by City staff, it was determined that the proposed UCSP might result in potentially significant adverse environmental impacts to the following:

- Land Use, Planning, and Zoning
- Landform Alteration/Aesthetics
- Cultural Resources
- Geology and Soils
- Paleontological Resources
- Transportation, Circulation, and Access
- Housing and Population
- Water Resources and Water Quality
- Air Quality
- Noise
- Public Services and Utilities
- Hazards/Risk of Upset

These issues are discussed in detail in Section 5.0, with impacts assessed on a “plan to ground” basis. The “plan to ground” analysis addresses the changes or impacts that will result from implementation of the proposed UCSP as compared to existing ground conditions. Pursuant to CEQA Guidelines Section 15126, all phases of the proposed UCSP are considered when evaluating its potential impact on the environment, including the phases of planning, acquisition, development, and operation.

A “plan to plan” analysis which addresses the changes or impacts that will result from implementation of the proposed UCSP as compared to the currently adopted Municipal Code Zoning is also provided in this EIR. While typically a “plan to plan” analysis would compare the proposed plan with the currently adopted plan, in this case that comparison is addressed in the land use impact analysis (Section 5.1) and rendered somewhat moot by the fact that the UCSP was written as an implementing tool for the recently adopted General Plan Update. In this case the Municipal Code Zoning (which will be superseded by the proposed UCSP for the UCSP Subdistricts Area) will form the existing plan condition under which the proposed plan will be compared. This comparison is concentrated in the discussion of the No Project alternative in Chapter 10.0 of this EIR.

Issues that were determined to be not significant are addressed in Chapter 9.0 of this EIR. These include the issues of mineral resources, biological resources, and agriculture.

Other mandatory sections required by CEQA include a discussion of cumulative impacts, growth inducement, unavoidable and irreversible significant environmental effects, and alternatives to the proposed project. These mandatory discussions are provided in Chapters 6.0, 7.0, 8.0, and 10.0, respectively, of this EIR.

The General Plan Update Final EIR (EIR #05-01, SCH #2004081066) addressed the development of the proposed UCSP area. The GPU and the GPU EIR were adopted by the Chula Vista City Council in December, 2005. The GPU EIR evaluated the entire area within the GPU boundary, including the UCSP area. Potential significant environmental effects resulting from the implementation of the GPU were identified for the issues of land use, landform alteration, biology, cultural resources, geology and soils, paleontology, agricultural resources, mineral resources, water quality, traffic, noise, air quality, public services, and hazards and risk of upset.

This EIR incorporates by reference the GPU Final EIR (EIR #05-01, SCH #2004081066) and associated Mitigation Monitoring Program as allowed in the CEQA Guidelines, Section 15150. These documents are available for review at the City of Chula Vista Planning Department at 276 Fourth Avenue, the Chula Vista Public Library Civic Center Branch at 365 F Street, and on the City of Chula Vista website documents page at www.ci.chula-vista.ca.us.

This EIR contains selected information summarized from throughout these prior documents to facilitate the environmental analysis and reader's review of this document where necessary.

2.2.2 Purpose of the EIR

This EIR has been prepared to achieve the following objectives:

- Inform decision makers and the general public of the potential environmental consequences of the approval and implementation of the proposed UC SP;
- Identify project alternatives or mitigation measures that are available to avoid or reduce potential significant environmental impacts;
- Serve as a basis for environmental review for all public and private development activities or undertakings pursuant to the UCSP, and resulting from approval of the UCSP;
- Provide environmental review for other lead or responsible agencies with jurisdiction over future development falling within the scope of the proposed UCSP;
- Reduce the environmental review required as subsequent development occurs according to the goals, policies, and regulations of the proposed UCSP.

In order to meet the first objective, this EIR forecasts the nature and extent of future development of the urban core pursuant to the projected buildout and various policies

and regulations that are proposed in the UCSP. Based on this foundation, the EIR identifies physical changes in the environment that may result from such future development, and in consideration of applicable threshold criteria, determines whether or not the changes constitute a significant impact. In addition, the EIR identifies mitigation measures that are available to avoid or minimize potentially significant impacts, thus meeting the second objective. The recommended mitigation measures identified in Chapter 5.0 of the EIR will be included in the Mitigation Monitoring and Reporting Plan (MMRP), which will accompany the Final EIR. These measures include measures that are to be carried out as part of specific future developments.

Regarding the third and fourth objectives, environmental review of future development projects within the UCSP Subdistricts Area will be accomplished using the Program EIR and Secondary Study process defined in Section 15168 of the CEQA Guidelines, and Section 15182 and 15183 which allows this Program EIR to serve as the basis for subsequent projects environmental review. Section 2.3.3 discusses this process in greater detail.

2.2.3 Type of EIR

This EIR has been prepared as a Program EIR, as defined in Section 15168 of the CEQA Guidelines. A Program EIR is recommended for a series of actions that are related geographically, as logical parts in a chain of contemplated actions, or in connection with the issuance of plans that govern the conduct of a continuing program [Section 15168 (a)]. The advantages of a Program EIR include the ability to provide a more exhaustive consideration of alternatives and cumulative effects than might be possible in a single project specific EIR; to avoid duplication of basic policy considerations; and to provide the Lead Agency (City of Chula Vista) with the ability to consider broad program-wide policies and mitigation measures that would apply to specific projects within the overall program [Section 15168 (b)]. In addition, as a Program EIR, this document is intended to be used by the City of Chula Vista as well as other Responsible Agencies when taking action on subsequent permits to allow development in accordance with the proposed UCSP.

2.2.4 Organization of the EIR

CEQA and the CEQA Guidelines specify the contents of EIRs and require the EIR to clearly identify the location of the specified contents. CEQA and the Guidelines do not, however, specify the format within which those items shall be included. In this EIR, a topical organization has been followed so that most of the information related to a single issue or topic is presented within the same report section. Table 2-1 lists the CEQA Guidelines references for required content and the location of each in this EIR. In addition, a brief overview of the chapters of this EIR are provided below:

**TABLE 2-1
CEQA-REQUIRED EIR CONTENTS**

CEQA Guidelines Section	Topic	Location in this EIR
15122	Table of Contents or Index	Table of Contents and this table
15123	Summary	Chapter 1.0
15124	Project Description	Chapter 3.0, with further details in each topical discussion in Chapter 5.0 as appropriate
15125	Environmental Setting	Summarized in Chapter 4.0 with more detail in the "Existing Conditions" section for each topic in Chapter 5.0
15126	Environmental Impact	
	(a) Significant Effects	"Impacts" sections of Chapter 5.0
	(b) Significant Effects Which Cannot Be Avoided	"Impacts" sections of Chapter 5.0
	(c) Mitigation Measures	"Mitigation" sections of Chapter 5.0
	(d) Alternatives	Chapter 10.0
	(e) Significant Irreversible Changes	Chapter 8.0
	(f) Growth Inducing Impacts	Chapter 7.0
15128	Effects Found Not To Be Significant	Chapter 9.0
15129	Organizations and Persons Consulted	Chapter 12.0
15130	Cumulative Impacts	Chapter 6.0
15148	Citations of Sources	Chapter 11.0

- **Chapter 1.0 Executive Summary** provides a summary of the proposed UCSP along with a table identifying significant impacts, proposed mitigation measures, and impact rating after mitigation. This chapter also contains a summary of the project alternatives that have been considered and compares the potential impacts of the alternatives with those of the proposed UCSP.
- **Chapter 2.0 Introduction** contains an overview of the proposed UCSP and the CEQA environmental review process.
- **Chapter 3.0 Project Description** provides a detailed discussion of the proposed UCSP, including background, objectives, anticipated buildout, mobility recommendations, land use and development regulations, development design guidelines, public realm guidelines, plan implementation, permit design review process, and plan administration. It also includes a list of discretionary actions that will be required to implement the proposed UCSP.
- **Chapter 4.0 Environmental Setting** contains a description of the physical environmental conditions (climate, topography, context) in the project area and vicinity.
- **Chapter 5.0 Environmental Impact Analysis** provides a detailed evaluation of specific issues that may be associated with significant environmental impacts. The discussion of each issue begins with a discussion of the existing conditions related to the issue to serve as a basis of analysis. An evaluation of potential impacts follows. The discussion of impacts is preceded by a statement of specific thresholds that are used to determine if the impacts would be significant. Once the impacts have been evaluated, specific mitigation measures are identified to avoid or reduce significant impacts.
- **Chapter 6.0 Cumulative Impacts** identifies the impact of the proposed UCSP in combination with other planned and future development in the region.
- **Chapter 7.0 Growth Inducing Impacts** evaluates the potential influence the proposed UCSP may have on growth within the project area as well as the region.
- **Chapter 8.0 Significant Irreversible Changes** identifies all of the significant impacts related to the proposed UCSP that cannot be avoided.
- **Chapter 9.0 Effects Found Not to Be Significant** lists all of the issues determined in the scoping process to be not significant, including a brief summary of the basis for this determination.

- **Chapter 10.0 Alternatives** provides a description of alternatives to the proposed UCSP.
- **Chapter 11.0 References** lists all of the documents, individuals, and organizations which are cited in the EIR.
- **Chapter 12.0 EIR Preparation** identifies all of the agencies, organizations and individuals who were directly involved in or were consulted for the preparation of the EIR.

Technical studies and supporting materials are provided in the appendixes, which are bound under separate cover and are available for review at the City of Chula Vista Community Development Department, 276 Fourth Avenue, Chula Vista, the Chula Vista Public Library Civic Center Branch at 365 F Street, Chula Vista, and on the City of Chula Vista's website at www.ci.chula-vista.ca.us.

2.3 EIR Review Process

The City of Chula Vista is the Lead Agency for the preparation and review of this EIR. The EIR review process occurs in two basic stages. The first stage is the Draft EIR, which offers the public the opportunity to comment on the document, while the second stage is the Final EIR, which provides the basis for approving the proposed project.

2.3.1 Draft EIR

This Draft EIR will be distributed for review to the public and public agencies for a 45-day review period for the purpose of providing comments “on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided and mitigated” (Section 15204, CEQA Guidelines). In accordance with Section 15087 (a) (1) of the CEQA Guidelines, a Notice of Availability of the Draft EIR will be issued in a newspaper of general circulation in the area. Copies of the Draft EIR will be distributed to responsible agencies and other interested parties and will be available for review at the City of Chula Vista Community Development Department, 276 Fourth Avenue, Chula Vista, the Chula Vista Public Library Civic Center Branch at 365 F Street, and on the City of Chula Vista's website at www.ci.chula-vista.ca.us.

A public hearing will be held at the end of the 45-day State Clearinghouse public review period by the Planning Commission to gather verbal comments on the adequacy of the document.

2.3.2 Final EIR

The City, as Lead Agency, will provide written responses to comments received on the Draft EIR per CEQA Guidelines Section 15088, and will consider all comments in making its decision to certify the Final EIR. Detailed responses to the comments received during public review; a Mitigation, Monitoring and Reporting Plan (MMRP); Findings of Fact; and, if necessary, a Statement of Overriding Considerations will be prepared as part of the EIR finalization process. The culmination of this process is a public hearing where the City Council will determine whether to certify the Final EIR as being complete and in accordance with CEQA.

2.3.3 Subsequent Environmental Review

Future development within the UCSP area, proposed pursuant to the UCSP, will be viewed in light of the Final EIR pursuant to CEQA Guidelines Section 15168, 15182 and 15183. Unless exempt from CEQA review as allowed in Section 15061 of the CEQA Guidelines, as each new development is proposed, a Secondary Study will be prepared to determine if the Final EIR adequately addresses the potential environmental impacts of the proposed development. No additional environmental documentation will be required for subsequent projects if the Secondary Study determines that the potential environmental effects have been adequately addressed in the Final EIR and/or individual developments would implement appropriate mitigation measures identified in the MMRP accompanying the Final EIR. In such cases, the Final EIR would be referenced in approving the required discretionary actions.

If the Secondary Study identifies new impacts or a substantial change in circumstances, additional environmental documentation would be required. The form of this documentation would depend upon the nature of the impacts of the development proposal being considered. Should a development result in new or substantially more severe significant impacts that are not adequately covered in this EIR, or there is a substantial change in circumstances that would require major revision to this EIR, or new information comes to light which was not known at the time this EIR was certified, a Subsequent EIR or Supplement to this EIR would be prepared in accordance with Sections 15162 and 15163 of the CEQA Guidelines. If potential new significant impacts can be fully mitigated, a Mitigated Negative Declaration would be prepared. If some changes or additions to this EIR are necessary, but none of the conditions described above calling for the preparation of a Subsequent or Supplemental EIR have occurred, the Lead Agency or Responsible Agency would prepare an Addendum. Unlike a Supplemental or Subsequent EIR, an Addendum to a previously certified EIR need not be circulated for public review and can be included in or attached to the Final EIR in accordance with Section 15164 of the CEQA Guidelines. More detailed development-specific studies conducted as part of this subsequent environmental review would further

quantify environmental impacts and generate project-specific mitigation measures to avoid or minimize significant environmental impacts of specific developments.

3.0 Project Description

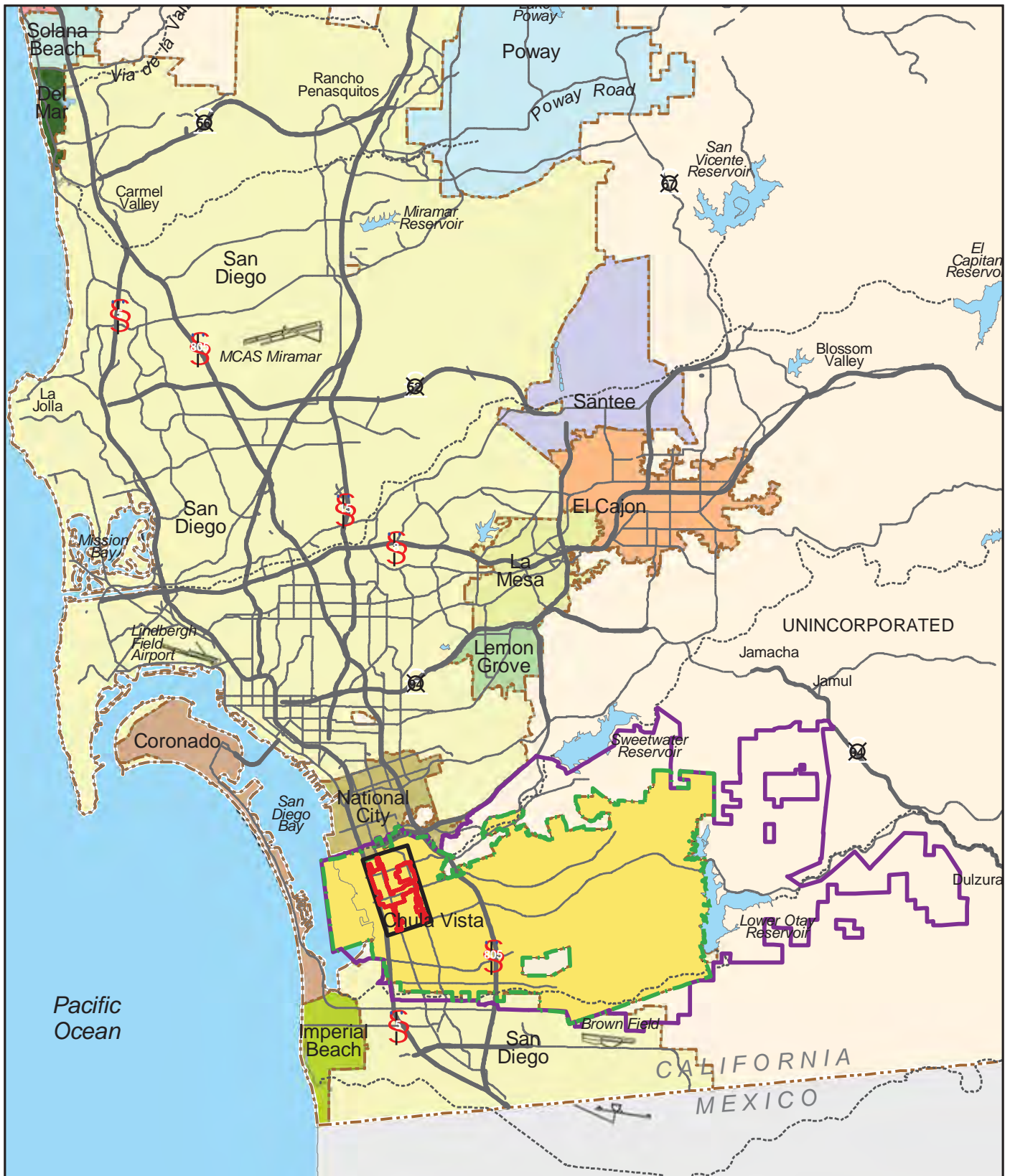
The proposed UCSP was prepared in accordance with the Chula Vista Municipal Code Section 19.07, Specific Plans, and the California Government Code, Title 7, Division 1, Chapter 3, Article 8, Sections 65450 through 65457. Relevant content of the UCSP is summarized in this chapter. The UCSP is available for review in its entirety at the City of Chula Vista Community Development Department at 276 Fourth Avenue, the Chula Vista Civic Center Library at 365 F Street in the City of Chula Vista, and on the City of Chula Vista's website at www.ci.chula-vista.ca.us.

3.1 Project Location

The City's urban core is located in the northwest portion of the City of Chula Vista, California, approximately ~~4~~8 miles north of the border with Mexico (Figure 3-1). Maps contained in the UCSP (and replicated in this EIR) show the boundaries of a 1700-acre UCSP Study Area and a 690 gross-acre UCSP Subdistricts Area. The 1700-acre UCSP Study Area extends generally from Interstate 5 on the west, Del Mar Avenue on the east, C Street on the north, and L Street on the South. The UCSP Subdistricts Area encompasses the commercial corridors along Third Avenue between roughly E and L Streets, Broadway between C and L Streets, and E and H Streets between Del Mar Avenue (just east of Third Avenue) and Interstate 5 (Figure 3-2). Multi-family residential areas are also included in the Subdistricts Area and are concentrated west of Broadway between D and I Streets.

The regulatory provisions of the UCSP (i.e., new zoning, development standards, and design guidelines) apply only to the Subdistricts Area of the UCSP. The Subdistricts Area was a focus of the GPU's "Areas of Change," having been determined to be an area most in need of revitalization. For this reason, it is the area where redevelopment and new infill development is expected to occur and subsequently the area within which the new zoning regulations and development design guidelines of the UCSP are proposed to implement the GPU.

The remaining portions of the UCSP Study Area, which were determined through the GPU process to be largely stable residential neighborhoods, are not expected to transition within the 25-year planning horizon of the UCSP, are excluded from the Subdistricts Area and are not subject to the new zoning and land use regulatory provisions of the UCSP. Existing zoning and land use regulations will not be changed in the remaining portions of the surrounding Study Area, outside of the UCSP Subdistricts Area. However, some provisions for urban amenities and other public improvements in the UCSP will apply to the Study Area, outside of the Subdistricts Area. The potential effects of these provisions are included in Chapter 5, Environmental Impact Analysis.



- UCSP Study Area
- UCSP Subdistricts Area
- City of Chula Vista boundary
- General Plan Update boundary



FIGURE 3-1
Regional Location



San Diego Bay



-  UCSP Study Area
-  UCSP Subdistricts Area



FIGURE 3-2
UCSP Study Area and Subdistricts Area

3.2 Project Background

The iterative process of developing the proposed UCSP, including steps to involve the citizens of Chula Vista, is described in Chapter II of the UCSP. In early 2004, the City of Chula Vista initiated the preparation of the UCSP and hired the firm of RRM Design Group to assist in its preparation. One of the initial steps in the planning process was to conduct a series of interviews with key stakeholders with a strong interest in the urban core. These stakeholders included business owners, property owners, residents, civic leaders, and other interested parties. The stakeholder interviews were followed by a series of background studies that addressed land use, design, traffic circulation, and economic opportunities and constraints.

In August 2004, an 18-member Advisory Committee was appointed by the City Council to provide guidance to the staff and consultant team on the major components of the plan. A two-day charrette was held as the Advisory Committee's kick-off meeting and was well attended by local citizens. The two-day event provided the Advisory Committee with background analyses, historical perspective, other significant planning efforts, and participation in a visual preference survey. The visual preference survey was conducted to gather input on Advisory Committee members' preferences for the future potential mass and scale of the built environment in the urban core. A visual preference survey was also conducted for attendees of the first of several community workshops, held September 2004. After a presentation on the Specific Plan and an overview of the planning and public participation process, attendees voted on various images for areas within the urban core with regard to building massing and scale. Participants were able to rate the images as being appropriate, neutral, or inappropriate for each particular area. Following the community workshop, the team also provided the opportunity for two local senior high school classes to participate in the visual preference survey.

Based on these initial inputs, a draft vision plan for the urban core was prepared which included concepts for three distinct areas of the urban core. The vision plans were intended to provide general concepts and evoke an image of what the urban core could look like over the next 20 to 25 years. In November 2004, the vision plans, as well as 10 key principles were presented to the Planning Commission and City Council in a joint workshop to obtain further input and confirm the direction of the planning effort. These early documents provided the framework for the detailed preparation of the Specific Plan.

The vision plans and the 10 key principles outlined in them are included as Chapter III of the UCSP. The 10 key principles comprise the overarching ideas and goals that will apply to future development of the urban core and are listed below:

- Develop a vibrant, distinct urban atmosphere with a day to evening environment.
- Build upon and enhance Chula Vista's cultural and historic traditions and diversity.