5 Environmental Analysis

The following sections analyze the potential environmental impacts that may occur as a result of implementation of the proposed Rohr Wohl Specific Plan Project (proposed project or project). Each issue analysis section includes a description of existing conditions, regulatory setting, the criteria for the determination of impact significance, evaluation of potential project impacts including mitigation measures (if applicable), and a conclusion of significance after mitigation for impacts identified as requiring mitigation (if applicable).

The environmental issues addressed in this chapter include the following:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural and Tribal Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Noise
- Land Use and Planning
- Population and Housing
- Public Services
- Recreation
- Transportation
- Utilities and Service Systems

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5.1 Aesthetics

This section describes the existing visual conditions of the Rohr Wohl Specific Plan Project (project) site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed project.

5.1.1 Existing Conditions

5.1.1.1 Regulatory Framework

Federal

There are no federal regulations relevant to aesthetics for this project.

State

California Scenic Highway Program

The California Scenic Highway Program was created in 1963 with the intent "to protect and enhance the natural scenic beauty of California highways and adjacent corridors, through special conservation treatment" (Caltrans 2020). The state laws that govern the Scenic Highway Program are Sections 260 through 263 of the Streets and Highways Code. A highway may be designated scenic based on the natural landscape visible by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the views of the highway. The Scenic Highway Program includes both officially designated scenic highways and highways that are eligible for designation. It is the responsibility of local jurisdictions to apply for scenic highway approval, which requires the adoption of a Corridor Protection Program (Caltrans 2020). In addition, once a scenic highway is designated, the local jurisdiction is responsible for regulating development within the scenic highway corridor.

The nearest officially designated scenic highway, State Route 75, is across San Diego Bay and approximately 2.2 miles west/southwest of the project site. The nearest eligible state scenic highway, State Route 75 from Interstate 5 (I-5) west to the Coronado/Imperial Beach border, is approximately 2.9 miles southwest of the project site (Caltrans 2020).

Local

City of Chula Vista General Plan

The City of Chula Vista General Plan contains objectives and policies to preserve and enhance aesthetic resources. Specifically, the Land Use and Transportation Element includes policies that strive to protect Chula Vista's open space network and contains design policies for features such as views, entryways, gateways, streetscapes, buildings, parks, and plazas. In addition to Scenic Roadways, the General Plan identifies valued scenic vistas and open space throughout Chula Vista, as discussed under the "Scenic Resources and Scenic Vistas" subheading in this section. Marina Parkway is a designated scenic roadway in the General Plan (City of Chula Vista 2005).

As of the January 2024 site visit, a portion of the southern Project site boundary fence was affixed with vinyl screening fabric that limited overall visibility to the project site as experienced from the intersection of Marina Parkway and H Street. In addition, the presence of existing fencing and parked vehicles on the elevated, graveled

lot to the south of the Project site generally blocks or obstructs the project site from view of northbound motorists on Marina Parkway as they pass alongside the Marina and approach H Street. While the vinyl screen fencing along the Project site and construction staging use of the nearby lot to the south are temporary features/conditions in the landscape, the project site will continue to have limited visibility from Marina due to future foreseeable development of Hotel/Office, Residential, Retail, and Hotel/Cultural Retail uses along the Marina Parkway corridor between Interstate 5 and H Street as envisioned in the Chula Vista Bayfront Master Plan.

Land Use and Transportation Element

The project site is designated for General Industrial use (City of Chula Vista 2005).

The General Plan contains the following objectives and policies relevant to the proposed project relative to aesthetics (City of Chula Vista 2005):

- **Policy LUT 6.3.** Require that the design of new residential, commercial, or public developments is sensitive to the character of existing neighborhoods through consideration of access, compatible building design and massing, and building height transitions, while maintaining the goals and values set forth in the General Plan. Within TFAs [Transit Focus Areas], design provisions should include requirements for a minimum building stepback of 15 feet for every 35 feet in height, for edges abutting residential uses.
- **Policy LUT 6.5.** Require, through sensitive and attractive design, that neighborhood retail centers and commercial service buildings are compatible with the surrounding neighborhood.
- **Policy LUT 8.3.** Ensure that buildings are appropriate to their context and designed to be compatible with surrounding uses and enhance the desired character of their District.
- **Policy LUT 9.1.** Create consistent entry features for City entryways and gateways so people recognize that they are entering Chula Vista.
- **Policy LUT 9.3.** As part of the approval process for projects within designated City entryway/gateway areas, the City shall confirm that the design conforms to applicable entryway/gateway design guidelines and standards.
- **Objective LUT 11.** Ensure that buildings and related site improvements for public and private development are well-designed and compatible with surrounding properties and districts.
- **Policy LUT 11.1.** Promote development that creates and enhances positive spatial attributes of major public streets; open spaces; cityscape; mountain and bay sight lines; and important gateways into the City.
- **Policy LUT 11.2.** Promote and place a high priority on quality architecture, landscape, and site design to enhance the image of Chula Vista, and create a vital and attractive environment for businesses, residents, and visitors.
- **Policy LUT 11.4.** Actively promote architectural and design excellence in buildings, open space, and urban design
- **Objective LUT 13.** Preserve scenic resources in Chula Vista, maintain the City's open space network, and promote beautification of the City.
- **Policy LUT 13.1.** Identify and protect important public viewpoints and viewsheds throughout the Planning Area, including features within and outside the planning area, such as: mountain; native habitat areas; San Diego Bay; and historic resources.
- **Policy LUT 13.3.** Screen unsightly industrial properties on the Bayfront, or convert such properties to uses that are consistent with the desired visual character of the Bayfront. As described in Section 11.0 of this Element and the Bayfront Master Plan.

[Note that the project site is outside of the land use plan boundaries of the Chula Vista Bayfront Master Plan.]

- **Policy LUT 13.4.** Any discretionary projects proposed adjacent to scenic routes, with the exception of individual single-family dwellings, shall be subject to design review to ensure that the design of the development proposal will enhance the scenic quality of the route. Review should include site design, architectural design, height, landscaping, signage, and utilities. Development adjacent to designated scenic routes should be designed to:
  - Create substantial open areas adjacent to scenic routes through clustering development;
  - Create a pleasing streetscape through landscaping and varied building setbacks; and
  - Coordinate signage, graphics and/or signage requirements, and standards.

Scenic Resources and Scenic Vistas

The General Plan identifies significant scenic resources and open space that help to define various area's visual and community character within Chula Vista. Scenic vistas and open space identified in the General Plan include the Otay River and Sweetwater River Valleys, Upper and Lower Otay Lakes, Sweetwater Reservoir, San Miguel/Mother Miguel Mountains, and the San Diego Bay (City of Chula Vista 2005). These open space areas make up the majority of the Chula Vista Greenbelt, the backbone of Chula Vista's open space and park system, which consists of a 28-mile-long open space system encircling Chula Vista (City of Chula Vista 2003a). The Greenbelt includes Multiple Species Conservation Program Preserve lands (City of Chula Vista 2003b), general open space, and existing and future trails, and connects several of Chula Vista's existing and future public parks. Additional natural open space areas within Chula Vista are identified in General Plan Figure 5-5, Open Space Network (City of Chula Vista 2005). The closest identified scenic vista and open space area to the project site is San Diego Bay, approximately 0.3 miles west of the project site.

Gateways

The General Plan identifies entryways and gateways that offer opportunities to improve Chula Vista's visual appearance and establish a community image through design treatments such as signage, landscaping, and architectural design enhancements. The City of Chula Vista designates both Primary and Secondary Gateways. Primary Gateways are from freeways and should appear visually inviting, provide adequate direction to places of interest, and have high-quality design features (City of Chula Vista 2005). Secondary Gateways are locations where a significant entry into the City occurs from an adjacent community and should provide travelers with a clear impression that they are entering the City (City of Chula Vista 2005).

Designated Primary Gateways with proximity to the project site include H Street and J Street (both from I-5 and to the west). There are no Secondary Gateways near the project site (City of Chula Vista 2005).

City-Designated Scenic Roadways

The City has designated several Scenic Roadways for their views of natural features and roadway characteristics, including enhanced landscaping, adjoining natural slopes, or special design features. Marina Parkway (from J Street to E Street) is the sole designated scenic roadway near the project site (City of Chula Vista 2005).

City of Chula Vista Municipal Code

While the project site is designated for General Industrial use, the project proposes a General Plan and Land Use Plan Amendment. The General Plan and Land Use Amendment would be processed concurrently with Specific Plan adoption and change the existing I-G (General Industrial) zoning designation to three new zoning designations: PA-1 (for Planning Area A), PA-2 (for Planning Area B-1), and PA-3 (for Planning Area B-2).

Light and glare are regulated by Chapter 17.28 and Section 19.66.100 of the Chula Vista Municipal Code, respectively. Chapter 17.28, Unnecessary Lights, is intended to prevent lighting from creating a nuisance by regulating the use of lighting in and around residential areas. The ordinance recognizes that lighting is widely used in commercial and industrial zones for the purpose of advertising and security, and that such lighting is essential to the conduct of many commercial and industrial enterprises. The ordinance requires that all light sources used for advertising, security, or safety purposes be arranged or shielded in such a manner as to not constitute a public nuisance for residential property owners (Section 17.28.020). Further, and as required by Section 17.28.040, all lighting plans in multiple-family, commercial, and industrial zones must be submitted to the Zoning Administrator for approval prior to installation. In addition, and as stipulated in Section 17.28.060, lighting from any use that is unshielded or focuses beams directly on adjacent residential property is prohibited at all times.

Section 19.66.100, Glare, prohibits direct or sky-reflected glare from floodlights and high-temperature processes that produce glare that is visible at the points of measurement, as specified in Section 19.66.060, Locations. Within the Industrial zone, the point of measurement is 500 feet from the establishment or use, or at any point within an adjacent zone other than an Industrial zone.

5.1.1.2 Existing Aesthetic Setting

On-Site Conditions

The project site consists of 44.8 acres in the City of Chula Vista, California. The site is in the northwest portion of the City of Chula Vista, directly adjacent to the City of San Diego. More specifically, the project site is west of I-5, north of H Street, south of G Street, and east of Marina Parkway; it is within the City of Chula Vista's Bayfront Planning Area (see Figure 4-1 in Chapter 4, Project Description, of this Environmental Impact Report).

As described in Chapter 4, Project Description, the project site is divided into three separate planning areas (see Figure 4-2 in Chapter 4). The eastern portion of the project site, closest to I-5 (between G Street and H Street), is designated as Planning Area A and is approximately 9.29 acres. The generally rectangular shaped area is developed and supports a long and rectangular (220 feet wide by 910 feet long), aged two-story industrial warehouse-type building (approximately 282,004 square feet) and a paved asphalt surface parking lot in its southerly, H Street–adjacent area. The cement building is clad in metallic and tan vertical siding along its easterly, second-story façade. Along its west-facing elevation, a series of large openings are present where window backs and projecting rectangular overhangs have been recently removed. Mature, non-native trees (primarily eucalyptus) are clustered in pockets along the site's eastern (i.e., adjacent to Bay Boulevard and its meandering sidewalk) and western boundaries. Lastly, and as of a January 2024 field visit, the parking lot and south-facing elevation of the building were under active renovation, with new landscape areas being installed near H Street and a new building extension being added. See Figure 5.1-1, Existing Conditions: Planning Area A, for photographs of existing site conditions.

The largest planning area, Planning Area B-1, is 26.13 acres and is bound by Planning Area A on the east, Planning Area B-2 on the south, and Marina Parkway on the west. A portion of the site's northern boundary is bound by

G Street, with the remaining boundaries parallelling a private road (see Figure 4-2). As with adjacent Planning Area B–2 (that is 9.36 acres), Planning Area B-1 was previous developed with an expansive, two- to three-story aged, industrial warehouse-style building and ancillary facilities, but is currently vacant (previous on-site uses have been demolished and removed). As observed during the January 2024 field visit, the southern boundary of Planning Area B-2 is lined by a 6- to 7-foot-high chain-link fence to which sections of newer, black and older green vinyl screening fabric have been installed (the sections of green vinyl presented faded coloring and areas that had been torn and/or lifted by winds). A series of vehicles, including passenger trucks, backhoes, a water truck, and a small crane/lift bucket truck, were observed on site, as were several portable bathrooms, large (approximately 20 feet high) and long mounds of dirt, and assortment of low scattered debris. See Figure 5.1-2, Existing Conditions: Planning Areas B-2 and B-1, for photographs of existing site conditions as experienced from H Street.

Surrounding Land Uses

Land uses surrounding the project site include vacant properties, undeveloped and natural lagoon/wildlife refuge lands, the mostly active Collins Aerospace campus, a small SDG&E substation, the triangular Bay Boulevard Park (a pocket park), and the Seven Mile Casino (housed in a single-story structure with several curved metal projections generally located above the ground-floor windows) to the north; a commercial building (currently housing The Galley restaurant), the Chula Vista Marina, and future development associated with the Chula Vista Bayfront Master Plan to the southwest and south; Bay Boulevard and I-5 to the east; and the under-construction Gaylord Pacific Resort Hotel and Convention Center to the west. See Figure 5.1-3, Existing Conditions: Surrounding Area, which shows the commercial uses and parking at the marina, and the under-construction resort hotel. Previously disturbed and gently sloping lands south of the project site, H Street, and its adjacent two-lane bike path are currently surfaced in gravel and are used for parking by construction personnel working on the in-progress Gaylord Pacific Resort Hotel and Convention Center (see Figure 5.1-4, Existing Conditions: Surrounding Area). As shown in Figure 5.1-3, the rectangular convention center structure and expansive 22-story Gaylord Pacific Resort Hotel and Convention Center are under construction, and as of January 2024, metallic and cement structural systems remained exposed on the hotel (some exterior paneling and windows had been installed on the south- and east-facing hotel exteriors), and two large cranes were present on site. A temporary, gravel-surfaced construction staging area populated by a series of grey and modular, single-story trailers is located south of the convention center site (see Figure 5.1-4).While present at the time of January 2024 site visit, the two large cranes are temporary features in the landscape and will be removed once construction of the Gaylord Pacific Resort Hotel and Convention Center is completed in approximately Spring 2025 (Port of San Diego 2024). Also, the graveled surfaced construction staging area referenced above is a temporary use and is identified as future space for Hotel/Cultural Retail uses in the Chula Vista Bayfront Master Plan (Port of San Diego 2024).

Scenic Vistas

As described in Section 5.1.1.1, Regulatory Framework, the closest General Plan–identified scenic vista and open space area to the project site is San Diego Bay, approximately 0.3 miles west of the project site. Views to the San Diego Bay are not available from the project site due to existing adjacent development associated with the Gaylord Pacific Resort Hotel and Convention Center (vertical hotel and related development tends to block westerly views, including San Diego Bay views, from the project site). Views to San Diego Bay are also not available from H Street between Bay Boulevard and Marina Parkway (i.e., segment of H Street that parallels the project site).

Scenic Highways

Marina Parkway (from J Street to E Street) is the sole locally designated scenic roadway in the project area. As of the January 2024 field visit, the segment of Marina Parkway north of H Street is closed (and has been demolished) to accommodate construction of the Gaylord Pacific Resort Hotel and Convention Center. Currently and as of January 2024, the project site has limited visibility from Marina Parkway, with the exception of the approximately 315-foot-long northbound segment from Sandpiper Way to H Street. Available views to northbound road users along this segment consist of the under-construction Gaylord Pacific Resort Hotel and Convention Center, the hotel and convention center construction staging site (bound by Sandpiper Way on the south and Marina Parkway on the east), and the slightly elevated and graveled lot south of H Street and east of Marina Parkway that is currently used for construction parking. The vinyl-fabric and chain-link fencing installed along the southern boundary of the project site is also visible from the Marina Parkway/H Street intersection.

As under-construction uses are completed and the Chula Vista Bayfront is built out, Marina Parkway is anticipated to continue to provide limited views to the project site. In addition to the future Hotel/Cultural Retail uses described above that will be located south of the project site, Chula Vista Bayfront Master Plan envisions Hotel/Office, Residential, and Retail uses along the Marina Parkway corridor from Interstate 5 to H Street and these uses would potentially obstruct or interrupt potential views to the project site.

Light and Glare

Limited sources of lighting and glare from existing uses are located within the boundaries of Planning Area A and are associated with the existing on-site structure. Lighting elements and support poles previously located in the Planning Area A parking lot (near H Street and in the southern portion of the site) had been removed prior to the January 2024 field visit; however, observations made during the field visit indicate that the redesigned parking lot would include overhead lighting installed at regular intervals. Because Planning Areas B-1- and B-2 are vacant and previous development including outdoor lighting elements has been demolished and removed, there are currently no stationary sources of permanent light or glare in these areas. Streetlights are installed along H Street and Marina Parkway south of H Street; the segment north of H Street is closed and currently contains no streetlights. While lighting is not installed in the construction parking lot located south of the project site and H Street, and lights were not observed in the construction staging area on Marina Parkway and south of the convention center, future uses on the current staging area site would include outdoor lighting typical of Hotel and Retail spaces. Lighting is installed in the Marina parking lot off of Marina Parkway. In addition to providing lighting for general illumination and security, the lighting elements listed above are potential sources of glare; however, the described elements are generally shielded and directed downward. Thus, these existing lighting sources are not a substantial source of potential glare in the surrounding area.

Viewers

Groups provided views to the project site are generally limited to motorists on local area roads, including H Street, Bay Boulevard, and Marina Parkway; cyclists on the H Street–adjacent bike path and the nearby segments of the Bayshore Bikeway; and Marina visitors (in particular, those in the public parking lot adjacent to Marina Parkway).

5.1.2 Thresholds of Significance

The significance criteria used to evaluate the project's impacts to aesthetics are based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to aesthetics would occur if the project would:

1. Have a substantial adverse effect on a scenic vista.
2. Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
3. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality.
4. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

5.1.3 Impacts

Two visual simulations of the Project as experienced from publicly accessible vantage points in the surrounding area were prepared to aid in the assessment of potential impacts to existing views and visual character. The selected vantage points are representative viewpoints available to viewer groups in the local area that offer clear views to the Project site. The viewpoints are located on northbound H Street and the southbound lane of the public bike path that parallels H Street near the Project site. Existing photographs from the selected viewpoints are presented as Figure 5.1-5a, View 1: Northbound H Street looking northeast towards Project site (Existing Conditions) and Figure 5.1-6a, View 2: Southbound on H Street Bike Path looking northwest towards Project site and active construction (Existing Conditions). Visual simulations of the Project with and without development on Planning Area B-2 as experienced from these viewpoints are presented on Figure 5.1-5b, View 1: Northbound H Street looking northeast towards Project site (Proposed Conditions) and Figure 5.1-6b, View 2: Southbound on H Street Bike Path looking northwest towards Project site and active construction (Proposed Conditions). The "without development on Planning Area B-2" scenario is depicted in visual simulations to account for delayed (i.e., 2028 start date) construction on this site and the approximate two year period (2026-2028) between which Planning Area B-1 would be built out and development would operate prior to start of construction on Planning Area B-2.

Would the project have a substantial adverse effect on a scenic vista?

The project includes rezones and a general plan amendment, no part of which would conflict with the rules governing scenic quality. To the extent they address scenic quality, they are discussed below.

The project site is in the City's Bayfront Planning Area, and the closest General Plan–identified scenic vista to the project site is San Diego Bay. Although only approximately 0.3 miles to the west, public views to San Diego Bay are not available from the project site; or from nearby mobile vantage points including Bay Boulevard or H Street (see Figure 5.1-1 that shows views of the project site from an adjacent segment of H Street. Also and as demonstrated in the captured westerly view from H Street presented on Figure 5.1-1, views to the San Diego Bay are not available across the Project site due to the presence of the 22-story Gaylord Pacific Resort Hotel and Convention Center (and parking structure) that are located to the south of the Project site and effectively block elements located further south (including the San Diego Bay) from view. Implementation of the Specific Plan and construction and operation

of potential future commercial, industrial, technology, and business park development in Planning Areas A (maximum permitted building height of 80 feet), B-1 (maximum permitted building height of 45 feet), and B-2 (maximum permitted building height of 60 feet) would not result in blockage or substantial interruption of existing available views to San Diego Bay from H Street or other local roads. While potential future development of structures on the site would be visible from H Street and other local roads, the presence of existing development in the immediate vicinity and specifically, to the south of the Project site including the 22-story Gaylord Pacific Resort Hotel and Convention Center effectively blocks the San Diego Bay from view of the nearest public roads to the east and south of the Project site. Therefore, impacts to scenic vistas from H Street and Bay Boulevard would be less than significant.

Marina Parkway (from J Street to E Street) is the sole locally designated scenic roadway in the project area. Although views to San Diego Bay are occasionally available from Marina Parkway (brief views to the Bay are available through gaps in existing trees from approximately Bay Boulevard west to Marina Way; a distance of approximately 0.22 miles), from north of Marina Way, views to the Bay are blocked by street trees, trees planted in and around marina parking lots, docked boats at the marina, and single-story buildings at the marina. On the northbound approach to Sandpiper Way and at the Marina Parkway/H Street intersection, westerly views toward the San Diego Bay are more constrained and fully blocked by single-story construction staging trailers; vinyl-covered chain-link fencing; and the under-construction, 22-story Gaylord Pacific Resort Hotel and Convention Center. See Figure 5.1-3. Marina Parkway is currently closed and demolished between H Street and G Street, and as experienced from the intersection of Marina Parkway and H Street, the project site is to the northeast. From the "open" segment of Marina Parkway from G Street north to Lagoon Drive, the project site is to the southeast. From both the Marina Parkway/H Street intersection and the northerly segment of Marina Parkway, the project site is not within westerly oriented views toward San Diego Bay, and therefore, implementation of the Specific Plan and construction and operation of potential future commercial, industrial, technology, and business park development in Planning Areas A, B-1, and B-2 would not result in blockage or substantial interruption of existing available views to San Diego Bay from Marina Parkway. Impacts would be **less than significant**.

Would the project substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?

The project site does not contain natural or built scenic resources. Planning Area A supports an aged two-story industrial warehouse–type building and a paved asphalt surface parking lot. Although modifications to the parking lot are currently underway, the existing warehouse-type building is not proposed for removal or substantial alteration. Planning Areas B-1 and B-2 were previously developed with large two- to three-story industrial warehouse–style building and ancillary facilities; however, these structures have been recently demolished. The areas are currently vacant and present as a large dirt lot supporting (on occasion) construction vehicles and stockpiles of dirt. The project site is also not readily visible from a state scenic highway because the nearest state scenic highway (State Route 75) is across San Diego Bay and approximately 2.2 miles west/southwest of the project site. Because the project site is not readily visible from a state scenic highway and proposed development would not remove or substantially alter scenic resources, including trees, rock outcroppings, and historic buildings, **no impacts** to views from a state scenic highway would occur.

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

Pursuant to the definition of an "urbanized area" as established in Public Resources Code (PRC) Section 21071, the project site is in an urbanized area. According to PRC Section 21071(a)(1), an urbanized area is an incorporated city with a population of at least 100,000; as of January 1, 2023, the estimated population of the City of Chula Vista was 274,784 persons (California Department of Finance 2023). By virtue of being located in an urbanized area, the project is assessed against the second of the two thresholds listed above (i.e., would the project conflict with applicable zoning and other regulations governing scenic quality).

A General Plan and Land Use Plan Amendment is proposed to be processed concurrently with Specific Plan adoption, which would change the existing General Industrial zoning designation to three new zoning designations: PA-1 (for Planning Area A), PA-2 (for Planning Area B-1), and PA-3 (for Planning Area B-2). These new designations would provide for permitted, conditionally permitted, and prohibited uses within six land use categories: Commercial Retail (CR), Commercial Visitor (CV), Commercial Office (CO), Light Industrial (LI), Regional Technology Park (RTP), and Business Park Flex (BPF). The existing zoning designation of General Industrial would be amended to complement the Collins Aerospace Campus to allow a flexible combination of light industrial, office, commercial and visitor-oriented uses to complement both the overall Chula Vista Bayfront area and the western part of Chula Vista. California Government Code (Title 7, Division 1, Chapter 3, Article 8, Sections 65450–65457) permits adoption and administration of specific plans as an implementation tool for the local general plan. Specific plans must demonstrate consistency in regulations, guidelines, and programs with the goals and policies set forth in the general plan. The Rohr Wohl Specific Plan would be prepared in conformance with the goals and policies of the City of Chula Vista General Plan as amended, in providing a commercial/light Industrial use on an underutilized property, creating new employment opportunities, and providing regulations that support the success of an employment area of the City.

Design and development of potential future commercial, industrial, technology, and business park development in Planning Areas A, B-1, and B-2 would be in conformance with the development concepts, standards, and design guidelines established in the Rohr Wohl Specific Plan (Appendix B). As such, future development would be consistent with the regulations (including those related to aesthetics, architecture, landscaping, and lighting) in the planning document governing new development on the project site; thus, no conflicts would occur.

The Chula Vista General Plan contains objectives and policies to preserve and enhance aesthetic resources. Specifically and as described in Section 5.1.1.1, the Land Use and Transportation Element includes policies that strive to protect the open space network and design policies for features such as view, entryways, gateways, streetscapes, buildings, parks, and plazas. Policies applicable to aesthetics and visual character are presented in Section 5.1.1.1, and a consistency analysis with those listed policies and the project is provided in Table 5.1-1.

Table 5.1-1. Consistency with Aesthetic-Related Policies of the General Plan

Policy*	Consistency
General Plan Land Use and Transportation Element	
Policy LUT 6.3. Require that the design of new residential, commercial, or public developments is sensitive to the character of existing	**Consistent.** Design standards for access, architecture, scale, form, massing, and articulation of the proposed project are provided in Chapter 8 of the Specific Plan (Appendix B).

Table 5.1-1. Consistency with Aesthetic-Related Policies of the General Plan

Policy*	Consistency
General Plan Land Use and Transportation Element	
neighborhoods through consideration of access, compatible building design and massing, and building height transitions, while maintaining the goals and values set forth in the General Plan. Within TFAs [Transit Focus Areas], design provisions should include requirements for a minimum building stepback of 15 feet for every 35 feet in height, for edges abutting residential uses. **Policy LUT 6.5.** Require, through sensitive and attractive design, that neighborhood retail centers and commercial service buildings are compatible with the surrounding neighborhood. **Policy LUT 8.3.** Ensure that buildings are appropriate to their context and designed to be compatible with surrounding uses and enhance the desired character of their District.	Further, new residential uses are not proposed, and the site does not abut residential uses. Future building designs proposed on the project site would be subject to the City of Chula Vista's (City) design review process, which would provide for opportunity to ensure consistency with City design goals and overall compatibility with the surrounding area (that includes business park/research uses to the north, and a future 22-story resort hotel and convention center to the west).
Policy LUT 9.1. Create consistent entry features for City entryways and gateways so people recognize that they are entering Chula Vista. **Policy LUT 9.3.** As part of the approval process for projects within designated City entryway/gateway areas, the City shall confirm that the design conforms to applicable entryway/gateway design guidelines and standards.	The Specific Plan establishes the procedures and requirements to approve new development that celebrates history, propels the transition to technology employment in a new economy, and welcomes retail and visitor-serving uses with an inviting, activated gateway that complements the Chula Vista Bayfront. The rich maritime and industrial history of the Chula Vista Bayfront will inform a cohesive district with the unique spaces and places for a welcoming visitor gateway that accommodates the spaces and uses that will propel the innovation economy. Specific Plan Section 3-C, Key Project Elements, includes a graphic that illustrates a sequence of gateways to the project site.
Objective – LUT 11. Ensure that buildings and related site improvements for public and private development are well-designed and compatible with surrounding properties and districts. **Policy LUT 11.2.** Promote and place a high priority on quality architecture, landscape, and site design to enhance the image of Chula Vista, and create a vital and attractive environment for businesses, residents, and visitors. **Policy LUT 11.4.** Actively promote architectural and design excellence in buildings, open space, and urban design.	**Consistent.** As stated in the Rohr Wohl Specific Plan, project design guidelines include development of buildings, open spaces, parking, and circulation that result in a cohesive, complementary, and visually pleasing environment that is compatible with the character of the Specific Plan. Representations of future site development are shown in Figures 5.1-5b and 5.1-6b. Further, design guidelines are in place to ensure high design quality of buildings and landscape amenities (Appendix B). Through execution and implementation of the design guidelines contained in the Rohr Wohl Specific Plan, future development on the project site would be consistent with this objective and policies.
Objective LUT 13. Preserve scenic resources in Chula Vista, maintain the City's open space network, and promote beautification of the City.	**Consistent.** The project site does not contain natural or built scenic resources. Planning Area A supports an aged two-story industrial warehouse–type building and a paved asphalt surface parking lot, and the remainder of the site comprises a recently demolished industrial warehouse site that presents as a large dirt lot surrounded by chain-link

Table 5.1-1. Consistency with Aesthetic-Related Policies of the General Plan

Policy*	Consistency
General Plan Land Use and Transportation Element	
	fencing. Through execution and implementation of the design guidelines contained in the Rohr Wohl Specific Plan, future development on the project site would improve existing site aesthetics through development of a visually cohesive environment. Representations of future site development are shown in Figures 5.1-5b and 5.1-6b.
Policy LUT 13.1. Identify and protect important public viewpoints and viewsheds throughout the Planning Area, including features within and outside the planning area, such as: mountain; native habitat areas; San Diego Bay; and historic resources.	**Consistent.** Future development of the project site would not substantially impact important public viewpoints or viewsheds associated with San Diego Bay. As demonstrated above in the discussion of potential impacts to scenic vistas, implementation of the Specific Plan and construction and operation of potential future commercial, industrial, technology, and business park development in Planning Areas A, B-1, and B-2 would not result in blockage or substantial interruption of existing available views to San Diego Bay from H Street or Marina Parkway.
Policy LUT 13.3. Screen unsightly industrial properties on the Bayfront, or convert such properties to uses that are consistent with the desired visual character of the Bayfront. As described in section 11.0 of this Element and the Bayfront Master Plan.	**Consistent.** Through execution and implementation of the design guidelines contained in the Rohr Wohl Specific Plan, future development on the project site would improve existing site aesthetics associated with a recently demolished industrial warehouse site through development of a cohesive, complementary, and visually pleasing environment that supports a mix of uses.
Policy LUT 13.4. Any discretionary projects proposed adjacent to scenic routes, with the exception of individual single-family dwellings, shall be subject to design review to ensure that the design of the development proposal will enhance the scenic quality of the route. Review should include site design, architectural design, height, landscaping, signage, and utilities. Development adjacent to designated scenic routes should be designed to: Create substantial open areas adjacent to scenic routes through clustering development; Create a pleasing streetscape through landscaping and varied building setbacks; and Coordinate signage, graphics and/or signage requirements, and standards.	**Consistent.** Marina Parkway (from J Street to E Street) is the sole locally designated scenic roadway in the project area. Compared to existing conditions that consist of currently vacant land (i.e., Planning Areas B-1 and B-2) and an existing aged industrial building in Planning Area A, implementation of the Specific Plan and execution of the design guidelines contained therein are intended to result in development of a cohesive, complementary, and visually pleasing environment that supports a mix of uses (Appendix B). In addition, future building designs proposed on the project site would be subject to the City's design review process, which would ensure consistency with City design goals and overall compatible with the surrounding area. Regarding signage, Section 8-G, Signage, of the Rohr Wohl Specific Plan requires that all signage be professionally designed and consistent across the project site.

* **Source**: City of Chula Vista 2005.

As seen in Table 5.1-1, the project would not conflict with aesthetics-related policies of the General Plan. Because implementation of the Rohr Wohl Specific Plan and future development on the project site would be consistent with identified aesthetics-related policies of the Chula Vista General Plan, potential conflicts with existing regulations governing scenic quality are not anticipated, and impacts would be **less than significant**.

Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Implementation of the Specific Plan and construction and operation of potential future commercial, industrial, technology, and business park development in Planning Areas A, B-1, and B-2 would result in the introduction of numerous sources of lighting and glare to the previously development but currently vacant (and recently demolished) project site. During construction, on-site activities within the three Planning Areas would comply with Section 19.68 (Performance Standards and Noise Control) of the City's Code of Ordinance. During the approximate 5-year construction period, activities, including site preparation, grading, building construction, paving, and architectural coating, would generally occur during daylight hour. However, during winter months and assuming construction contractors elect to work beyond sunset and till 7:00 p.m., the use of mobile lighting may be required. During potential future use of lighting during construction, the frequency of nighttime lighting use would be limited, the duration of use would typically be brief, and the location of lighting would be limited to areas of active construction (i.e., illumination of the entirety of the project site and/or individual planning areas would not occur). In addition, lighting would typically be directed downward and shielded so as to not result in unnecessary skyglow or substantial light trespass onto neighboring properties. Further and consistent with the City's Multiple Species Conservation Program Subarea Plan Agency Management Issues (City of Chula Vista 2003b), the project would implement best management practices to protect preserve lands and sensitive species from construction night lighting. In addition, the project site encompasses industrial lands within the City's Bayfront Planning Area, and the nearest residential uses are east of the site and east of I-5. Based on the distance from light sources operating on the project site and the proposed frequency and duration of use, temporary lighting during construction would not result in substantial light or glare such that nighttime views in the area would be substantially affected. Thus, lighting and glare impacts during construction of potential future commercial, industrial, technology, and business park development would be **less than significant.**

Development and operation of potential future commercial, industrial, technology, and business park uses in Planning Areas A, B-1, and B-2 would result in additional lighting sources on the project site, and more generally, in the Bayfront Planning Area. Although specific lighting plans and schedules have not been prepared, the project site is likely to support lighting and potential glare sources typical of commercial, industrial, and business park development. For example, site lighting would likely include entry monument and signage at the project site entrance off H Street; parking lot lighting; illuminated building fascia signage on commercial uses/buildings; exterior-mounted lighting on buildings; and lighting in paseos, greenways, courtyards, common areas, and pedestrian paths. Although buildout of the project site is likely to result in an increase in lighting sources on the project site compared to the prior industrial warehouse that was recently demolished, new exterior lighting sources would be directed downward and designed to prevent direct glare onto neighboring uses/properties (see PDF-4 in Chapter 4, Project Description) and on more distant refuge lands north and northwest of the project site (i.e., Planning Area B-1). Exterior lighting sources would also generally be shielded so as to minimize the potential for received glare and uplighting/skyglow, and to ensure consistency with the City's Multiple Species Conservation Program Subarea Plan Agency Management Issues (Lighting) (City of Chula Vista 2003b). All lighting for project site operations would provide adequate shielding to protect preserve lands and sensitive species from night lighting. In addition, lighting sources associated with future development on the project site would operate in a largely developed area consisting of existing industrial warehouses and business park/technology development/structures, and an under-construction, large-scale hotel and adjacent convention center that will include numerous exterior lighting fixtures/sources to support overall site programming and uses. Based on the analysis presented above, exterior lighting installed on the project site to support operations would not adversely affect nighttime views in the area. Impacts would be **less than significant**.

The potential for new site lighting to produce substantial glare that could adversely affect nighttime views is addressed above (impacts would be less than significant). Regarding future site development, building materials, and other sources of potential glare, design of future development would be carried out in compliance with the design guidelines established in the Rohr Wohl Specific Plan. Specific to building materials, Chapter 8, Design Guidelines, of the Rohr Wohl Specific Plan requires that building finishes be non-reflective, use of reflective glass is restricted, and mirrored glass is prohibited (see Section 8-B of the Rohr Wohl Specific Plan [Appendix B]). Because future development on the project site would incorporate non-reflective finishes, include restricted use of reflective glass, and would not include use of mirrored glass, potential future commercial, industrial, technology, and business park development would not result in substantial glare that would adversely affect daytime views in the area. Impacts would be **less than significant**.

5.1.4 Level of Significance Prior to Mitigation

Impacts related to aesthetics would be **less than significant.**

5.1.5 Mitigation Measures

No mitigation measures would be required.

5.1.6 Level of Significance After Mitigation

No mitigation measures would be required. Impacts related to aesthetics would be **less than significant.**

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View west from H Street near Planning Area A



View north from H Street to existing development on Planning Area A

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FIGURE 5.1-1

Existing Conditions: Planning Area A

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View northeast from H Street towards Planning Area B-2



View northwest from H Street Bike Path looking towards Planning Areas B-2 and B-1

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FIGURE 5.1-2

Existing Conditions: Planning Areas B-2 and B-1

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View southwest from Marina Parkway towards Chula Vista Marina



View northwest from Marina Parkway at Sandpiper Way towards under construction Gaylord Pacific Resort Hotel

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FIGURE 5.1-3

Existing Conditions: Surrounding Area

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View east from H Street bike path towards construction parking lot to south of Project site



View south from Bay Boulevard near G Street towards under construction site, existing substation, under construction parking structure and 22-story resort hotel

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FIGURE 5.1-4

Existing Conditions: Surrounding Area

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FIGURE 5.1-5a

View 1: Northbound H Street looking northeast towards Project site (Existing Conditions)

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Visual Simulation of Future Site Development (no development on Planning Area B-2)



Visual Simulation of Future Site Development (development shown on Planning Area B-2)

FIGURE 5.1-5b

View 1: Northbound H Street looking northeast towards Project site (Proposed Conditions)

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FIGURE 5.1-6a

View 2: Southbound on H Street Bike Path looking northwest towards Project site and active construction (Existing Conditions)

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Visual Simulation of Future Site Development (no development on Planning Area B-2)



Visual Simulation of Future Site Development (development shown on Planning Area B-2)

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FIGURE 5.1-6b

View 2: Southbound on H Street Bike Pathlooking northwest towards Project site and active construction (Proposed Conditions)

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5.2 Air Quality

This section describes existing conditions, identifies associated regulatory requirements, evaluates potential air quality impacts as a result of construction and operation, and identifies mitigation measures related to implementation of the proposed project. The discussion in this section is based on the Air Quality and Greenhouse Gas Emissions Technical Report prepared for the project by Dudek in August 2024. The complete report is contained in Appendix C of this EIR.

5.2.1 Existing Conditions

5.2.1.1 Regulatory Framework

Federal

Criteria Air Pollutants

The federal Clean Air Act (CAA), passed in 1970 and last amended in 1990, forms the basis for the national air pollution control effort. The U.S. Environmental Protection Agency (EPA) is responsible for implementing most aspects of the Clean Air Act (CAA), including the setting of National Ambient Air Quality Standards (NAAQS) for major air pollutants, hazardous air pollutant (HAP) standards, approval of state attainment plans, motor vehicle emission standards, stationary source emission standards and permits, acid rain control measures, stratospheric ozone (O_3) protection, and enforcement provisions.

NAAQS are established by the EPA for "criteria pollutants" under the CAA, which are O_3, carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), coarse particulate matter (PM_{10}), fine particulate matter ($PM_{2.5}$), and lead. The NAAQS describe acceptable air quality conditions designed to protect the health and welfare of the citizens of the nation. The CAA requires the EPA to reassess the NAAQS at least every 5 years to determine whether adopted standards are adequate to protect public health based on current scientific evidence. States with areas that exceed the NAAQS must prepare a state implementation plan (SIP) that demonstrates how those areas will attain the standards within mandated time frames.

Hazardous Air Pollutants

The 1977 CAA Amendments required the EPA to identify national emission standards for hazardous air pollutants to protect the public health and welfare. HAPs include certain volatile organic chemicals, pesticides, herbicides, and radionuclides that present a tangible hazard, based on scientific studies of exposure to humans and other mammals. Under the 1990 CAA Amendments, which expanded the control program for HAPs, 189 substances and chemical families were identified as HAPs.

State

Criteria Air Pollutants

The California Clean Air Act was adopted in 1988 and establishes the state's air quality goals, planning mechanisms, regulatory strategies, and standards of progress. Under the California Clean Air Act, the task of air quality management and regulation has been legislatively granted to CARB, with subsidiary responsibilities assigned to air quality management districts and air pollution control districts at the regional and county levels. CARB is

responsible for ensuring implementation of the California Clean Air Act, responding to the federal CAA, and regulating emissions from motor vehicles and consumer products. Pursuant to the authority granted to it, CARB has established California Ambient Air Quality Standards (CAAQS), which are generally more restrictive than the NAAQS.

The NAAQS and CAAQS are presented in Table 5.2-1.

Table 5.2-1. Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards[a]	National Standards[b]	
		Concentration[c]	Primary[c,d]	Secondary[c,e]
O_3	1 hour	0.09 ppm (180 µg/m³)	—	Same as primary standard[f]
	8 hours	0.070 ppm (137 µg/m³)	0.070 ppm (137 µg/m³)[f]	
NO_2[g]	1 hour	0.18 ppm (339 µg/m³)	0.100 ppm (188 µg/m³)	Same as primary standard
	Annual arithmetic mean	0.030 ppm (57 µg/m³)	0.053 ppm (100 µg/m³)	
CO	1 hour	20 ppm (23 mg/m³)	35 ppm (40 mg/m³)	None
	8 hours	9.0 ppm (10 mg/m³)	9 ppm (10 mg/m³)	
SO_2[h]	1 hour	0.25 ppm (655 µg/m³)	0.075 ppm (196 µg/m³)	—
	3 hours	—	—	0.5 ppm (1,300 µg/m³)
	24 hours	0.04 ppm (105 µg/m³)	0.14 ppm (for certain areas)[g]	—
	Annual	—	0.030 ppm (for certain areas)[g]	—
PM_{10}[i]	24 hours	50 µg/m³	150 µg/m³	Same as primary standard
	Annual arithmetic mean	20 µg/m³	—	
$PM_{2.5}$[i]	24 hours	—	35 µg/m³	Same as primary standard
	Annual arithmetic mean	12 µg/m³	9.0 µg/m³	15.0 µg/m³
Lead[j, k]	30-day average	1.5 µg/m³	—	—
	Calendar quarter	—	1.5 µg/m³ (for certain areas)[k]	Same as primary standard
	Rolling 3-month average	—	0.15 µg/m³	
Hydrogen sulfide	1 hour	0.03 ppm (42 µg/m³)	—	—
Vinyl chloride[j]	24 hours	0.01 ppm (26 µg/m³)	—	—
Sulfates	24- hours	25 µg/m³	—	—

Table 5.2-1. Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards[a]	National Standards[b]	
		Concentration[c]	Primary[c,d]	Secondary[c,e]
Visibility reducing particles	8 hour (10:00 a.m. to 6:00 p.m. PST)	Insufficient amount to produce an extinction coefficient of 0.23 per kilometer due to the number of particles when the relative humidity is less than 70%	—	—

Source: CARB 2016.

Notes: O_3 = ozone; ppm = parts per million by volume; μg/m³ = micrograms per cubic meter; NO_2 = nitrogen dioxide; CO = carbon monoxide; mg/m³= milligrams per cubic meter; SO_2 = sulfur dioxide; PM_{10} = particulate matter with an aerodynamic diameter less than or equal to 10 microns; $PM_{2.5}$ = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns.

a California standards for O_3, CO, SO_2 (1-hour and 24-hour), NO_2, suspended particulate matter (PM_{10}, $PM_{2.5}$), and visibility-reducing particles are values that are not to be exceeded. All others are not to be equaled or exceeded. CAAQS are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

b National standards (other than O_3, NO_2, SO_2, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once per year. The O_3 standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over 3 years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 μg/m³ is equal to or less than 1. For $PM_{2.5}$, the 24-hour standard is attained when 98% of the daily concentrations, averaged over 3 years, are equal to or less than the standard.

c Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based on a reference temperature of 25°Celsius (°C) and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

d National Primary Standards: The levels of air quality necessary, with an adequate margin of safety, to protect the public health.

e National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

f On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

g To attain the national 1-hour standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 parts per billion (ppb). Note that the national 1-hour standard is in units of ppb. California standards are in units of ppm. To directly compare the national 1-hour standard to the California standards, the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.

h On June 2, 2010, a new 1-hour SO_2 standard was established, and the existing 24-hour and annual primary standards were revoked. To attain the national 1-hour standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until 1 year after an area is designated for the 2010 standard, except that in areas designated nonattainment of the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

i On December 14, 2012, the national annual $PM_{2.5}$ primary standard was lowered from 15 μg/m³ to 12.0 μg/m³. The existing national 24-hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 μg/m³, as was the annual secondary standard of 15 μg/m³. The existing 24-hour PM_{10} standards (primary and secondary) of 150 μg/m³ were also retained. The form of the annual primary and secondary standards is the annual mean averaged over 3 years.

j CARB has identified lead and vinyl chloride as TACs with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

k The national standard for lead was revised on October 15, 2008, to a rolling 3-month average. The 1978 lead standard (1.5 μg/m³ as a quarterly average) remains in effect until 1 year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

Ambient Air Quality Monitoring Data

SDAPCD operates a network of ambient air monitoring stations throughout the County, which measure ambient concentrations of pollutants and determine whether the ambient air quality meets the CAAQS and the NAAQS. SDAPCD monitors air quality conditions at 10 locations throughout the basin. The Chula Vista monitoring station,

approximately 5 miles east of the project site, represents the closest monitoring station to the project site for concentrations for O_3, PM_{10}, $PM_{2.5}$, and NO_2. The closest monitoring station for CO is the El Cajon monitoring station. The Lexington Elementary School monitoring station is the only station measuring and SO_2 in San Diego County. Ambient concentrations of pollutants from 2020 through 2022 are presented in Table 5.2-2.

Table 5.2-2. Local Ambient Air Quality Data

Monitoring Station	Unit	Averaging Time	Agency/ Method	AAQS	Measured Concentration by Year			Exceedances by Year		
					2020	2021	2022	2020	2021	20222
Ozone (O_3)										
Chula Vista	ppm	Maximum 1-hour concentration	State	0.09	0.106	0.084	0.078	1	0	0
	ppm	Maximum 8-hour concentration	State	0.070	0.086	0.067	0.067	4	0	0
			Federal	0.070	0.086	0.066	0.066	4	0	0
Nitrogen Dioxide (NO_2)										
Chula Vista	ppm	Maximum 1-hour concentration	State	0.18	0.045	0.041	0.052	0	0	0
			Federal	0.100	0.045	0.041	0.052	0	0	0
	ppm	Annual concentration	State	0.030	0.009	0.008	0.009	0	0	0
			Federal	0.053	0.008	0.007	0.009	0	0	0
Carbon Monoxide (CO)										
El Cajon	ppm	Maximum 1-hour concentration	State	20	3.3	3.0	2.2	0	0	0
			Federal	35	1.7	1.8	1.2	0	0	0
	ppm	Maximum 8-hour concentration	State	9.0	3.3	3.0	2.2	0	0	0
			Federal	9	1.7	1.8	1.2	0	0	0
Sulfur Dioxide (SO_2)										
Lexington Elementary School	ppm	Maximum 1-hour concentration	Federal	0.075	0.002	0.002	0.001	0	0	0
	ppm	Maximum 24-hour concentration	State	0.04	0.000	0.000	0.000	0	0	0
			Federal	0.140	0.000	0.000	0.000	0	0	0
	ppm	Annual concentration	Federal	0.030	0.000	0.000	0.000	0	0	0
Coarse Particulate Matter (PM_{10})[a]										
Chula Vista	µg/ m^3	Maximum 24-hour concentration	State	50	68	46	38	ND	ND	ND
			Federal	150	68	46	38	0	0	0
	µg/ m^3	Annual concentration	State	20	24.8	23.9	22.9	ND	ND	ND

Table 5.2-2. Local Ambient Air Quality Data

Monitoring Station	Unit	Averaging Time	Agency/ Method	AAQS	Measured Concentration by Year			Exceedances by Year		
					2020	2021	2022	2020	2021	20222
Fine Particulate Matter ($PM_{2.5}$)[a]										
Chula Vista	µg/ m^3	Maximum 24-hour concentration	Federal	35	46.7	24.9	16.2	2	0	0
	µg/ m^3	Annual concentration	State	12	10.7	9.5	8.44	ND	ND	ND
			Federal	12.0	10.7	9.5	8.44	2	0	0

Sources: CARB 2023a, SDAPCD 2020, SDAPCD 2021, SDAPCD 2022a

Notes: ppm = parts per million; — = not available or applicable; µg/m^3 = micrograms per cubic meter; ND = insufficient data available to determine the value.

Data taken from CARB iADAM (http://www.arb.ca.gov/adam) and EPA AirData (http://www.epa.gov/airdata/) represent the highest concentrations experienced over a given year.

Exceedances of federal and state standards are only shown for O_3 and particulate matter. Daily exceedances for particulate matter are estimated days because PM_{10} and $PM_{2.5}$ are not monitored daily. All other criteria pollutants did not exceed federal or state standards during the years shown. There is no federal standard for 1-hour O_3, annual PM_{10}, or 24-hour SO_2, nor is there a state 24-hour standard for $PM_{2.5}$.

The Camp Pendleton monitoring station is located at 21441-W B Street, Oceanside, California.

The Rancho Carmel Drive monitoring station is located at 11403 Rancho Carmel Drive, San Diego.

The El Cajon monitoring station is located at 10537 Floyd Smith Drive, El Cajon, California.

[a] Measurements of PM_{10} and $PM_{2.5}$ are usually collected every 6 days and every 1 to 3 days, respectively. Number of days exceeding the standards is a mathematical estimate of the number of days concentrations would have been greater than the level of the standard had each day been monitored. The numbers in parentheses are the measured number of samples that exceeded the standard.

SDAB Attainment Designation

Pursuant to the 1990 CAA Amendments, EPA classifies air basins (or portions thereof) as "attainment" or "nonattainment" for each criteria air pollutant, based on whether the NAAQS have been achieved. Generally, if the recorded concentrations of a pollutant are lower than the standard, the area is classified as "attainment" for that pollutant. If an area exceeds the standard, the area is classified as "nonattainment" for that pollutant. As previously discussed, these standards are set by EPA or CARB for the maximum level of a given air pollutant that can exist in the outdoor air without unacceptable effects on human health or the public welfare. If there is not enough data available to determine whether the standard is exceeded in an area, the area is designated as "unclassified" or "unclassifiable."

The designation of "unclassifiable/attainment" means that the area meets the standard or is expected to be meet the standard despite a lack of monitoring data. Areas that achieve the standards after a nonattainment designation are redesignated as maintenance areas and must have approved maintenance plans to ensure continued attainment of the standards. The California Clean Air Act, like its federal counterpart, called for the designation of areas as "attainment" or "nonattainment," but based on the CAAQS rather than the NAAQS.

Table 5.2-3 summarizes SDAB's federal and state attainment designations for each of the criteria pollutants.

Table 5.2-3. SDAB Attainment Designation

Pollutant	Federal Designation	State Designation
O_3 (8-hour)	**Nonattainment**	**Nonattainment**
O_3 (1-hour)	Attainment[a]	**Nonattainment**

Table 5.2-3. SDAB Attainment Designation

Pollutant	Federal Designation	State Designation
CO	Attainment	Attainment
PM_{10}	Unclassifiable[b]	**Nonattainment**
$PM_{2.5}$	Attainment	**Nonattainment**[c]
NO_2	Attainment	Attainment
SO_2	Attainment	Attainment
Lead	Attainment	Attainment
Sulfates	(No federal standard)	Attainment
Hydrogen sulfide	(No federal standard)	Unclassified
Visibility-reducing particles	(No federal standard)	Unclassified
Vinyl chloride	(No federal standard)	No designation

Sources: SDAPCD 2022b, CARB 2023b
Definitions: attainment = meets the standards; nonattainment = does not meet the standards; unclassified or unclassifiable = insufficient data to classify
Notes: SDAB = San Diego; O_3 = ozone; CO = carbon monoxide; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; NO_2 = nitrogen dioxide; SO_2 = sulfur dioxide.

[a] The federal 1-hour standard of 0.12 parts per million (ppm) was in effect from 1979 through June 15, 2005. The revoked standard is referenced here because it was employed for such a long period and because this benchmark is addressed in SIPs.

[b] At the time of designation, if the available data does not support a designation of attainment or nonattainment, the area is designated as unclassifiable.

[c] CARB has not reclassified the region to attainment yet due to (1) incomplete data, and (2) the use of non-California Approved Samplers (CAS). While data collected does meet the requirements for designation of attainment with federal $PM_{2.5}$ standards, the data completeness requirements for state $PM_{2.5}$ standards substantially exceed federal requirements and mandates, and have historically not been feasible for most air districts to adhere to given local resources. APCD has begun replacing most regional filter-based $PM_{2.5}$ monitors as they reach the end of their useful life with continuous $PM_{2.5}$ air monitors to ensure collected data meets stringent completeness requirements in the future. APCD anticipates these new monitors will be approved as "CAS" monitors once CARB review the list of approved monitors, which has not been updated since 2013.

Toxic Air Contaminants

The state Air Toxics Program was established in 1983 under AB 1807 (Tanner). The California TAC list identifies more than 200 pollutants, of which carcinogenic and noncarcinogenic toxicity criteria have been established for a subset of these pollutants pursuant to the California Health and Safety Code. In accordance with AB 2728, the state list includes the (federal) HAPs. The Air Toxics “Hot Spots” Information and Assessment Act of 1987 (AB 2588) seeks to identify and evaluate risk from air toxics sources; however, AB 2588 does not regulate air toxics emissions. TAC emissions from individual facilities are quantified and prioritized. “High-priority” facilities are required to perform a health risk assessment (HRA), and if specific thresholds are exceeded, are required to communicate the results to the public in the form of notices and public meetings.

In 2000, CARB approved a comprehensive Diesel Risk Reduction Plan to reduce diesel emissions from both new and existing diesel-fueled vehicles and engines. Additional regulations apply to new trucks and diesel fuel, including the On-Road Heavy Duty Diesel Vehicle (In-Use) Regulation, the On-Road Heavy Duty (New) Vehicle Program, the In-Use Off-Road Diesel Vehicle Regulation, and the New Off-Road Compression-Ignition (Diesel) Engines and Equipment program. All of these regulations and programs have timetables by which manufacturers must comply and existing operators must upgrade their diesel powered equipment. Several Airborne Toxic Control Measures that reduce diesel emissions including In-Use Off-Road Diesel-Fueled Fleets (13 CCR 2449 et seq.) and In-Use On-Road Diesel-Fueled Vehicles (13 CCR 2025).

Idling of Commercial Heavy-Duty Trucks (13 CCR 2485)

In July 2004, CARB adopted an Airborne Toxic Control Measure (ATCM) to control emissions from idling trucks. The ATCM prohibits idling for more than 5 minutes for all commercial trucks with a gross vehicle weight rating over 10,000 pounds. The ATCM contains an exception that allows trucks to idle while queuing or involved in operational activities.

In-Use Off-Road Diesel-Fueled Fleets (13 CCR 2449 et seq.)

In July 2007, CARB adopted an ATCM for in-use off-road diesel vehicles. This regulation requires that specific fleet average requirements be met for NO_x emissions and for particulate matter emissions. Where average requirements cannot be met, Best Available Control Technology requirements apply. The regulation also includes several recordkeeping and reporting requirements.

In response to AB 8 2X, the regulations were revised in July 2009 (effective December 3, 2009) to allow a partial postponement of the compliance schedule in 2011 and 2012 for existing fleets. On December 17, 2010, CARB adopted additional revisions to further delay the deadlines, reflecting reductions in diesel emissions due to the poor economy and overestimates of diesel emissions in California. The revisions delayed the first compliance date until no earlier than January 1, 2014, for large fleets, with final compliance by January 1, 2023. The compliance dates for medium fleets were delayed until an initial date of January 1, 2017, and a final compliance date of January 1, 2023. The compliance dates for small fleets were delayed until an initial date of January 1, 2019, and a final compliance date of January 1, 2028. Correspondingly, the fleet average targets were made more stringent in future compliance years. The revisions also accelerated the phaseout of equipment with older equipment added to existing large and medium fleets over time, requiring the addition of Tier 2 or higher engines starting on March 1, 2011, with some exceptions: Tier 2 or higher engines on January 1, 2013, without exception; and Tier 3 or higher engines on January 1, 2018 (January 1, 2023, for small fleets).

On October 28, 2011 (effective December 14, 2011), the Executive Officer approved amendments to the regulation. The amendments included revisions to the applicability section and additions and revisions to the definitions. The initial date for requiring the addition of Tier 2 or higher engines for large and medium fleets, with some exceptions, was revised to January 1, 2012. New provisions also allow for the removal of emission control devices for safety or visibility purposes. The regulation also was amended to combine the particulate matter and NO_x fleet average targets under one, instead of two, sections. The amended fleet average targets are based on the fleet's NO_x average, and the previous section regarding particulate matter performance requirements was deleted completely. The Best Available Control Technology requirements, if a fleet cannot comply with the fleet average requirements, were restructured and clarified. Other amendments to the regulations included minor administrative changes to the regulatory text.

In-Use On-Road Diesel-Fueled Vehicles (13 CCR 2025)

On December 12, 2008, CARB adopted an ATCM to reduce NO_x and particulate matter emissions from most in-use on-road diesel trucks and buses with a gross vehicle weight rating greater than 14,000 pounds. The original ATCM regulation required fleets of on-road trucks to limit their NO_x and particulate matter emissions through a combination of exhaust retrofit equipment and new vehicles. The regulation limited particulate matter emissions for most fleets by 2011, and limited NO_x emissions for most fleets by 2013. The regulation did not require any vehicle to be replaced before 2012 and never required that all vehicles in a fleet be replaced.

In December 2009, the CARB Governing Board directed staff to evaluate amendments that would provide additional flexibility for fleets adversely affected by the poor California economy. On December 17, 2010, CARB revised this ATCM to delay its implementation along with limited relaxation of its requirements. Starting on January 1, 2015, lighter trucks with a gross vehicle weight rating of 14,001 to 26,000 pounds with 20-year-old or older engines need to be replaced with newer trucks (2010 model year emissions equivalent, as defined in the regulation). Trucks with a gross vehicle weight rating greater than 26,000 pounds with 1995 model year or older engines needed to be replaced as of January 1, 2015. Trucks with 1996–2006 model year engines must install a Level 3 (85% control) diesel particulate filter starting on January 1, 2012, to January 1, 2014, depending on the model year, and then must be replaced after 8 years. Trucks with 2007–2009 model year engines have no requirements until 2023, at which time they must be replaced with 2010 model year emissions equivalent engines, as defined in the regulation. Trucks with 2010 model year engines would meet the final compliance requirements. The ATCM provides a phase-in option under which a fleet operator would equip a percentage of trucks in the fleet with diesel particulate filters, starting at 30% as of January 1, 2012, with 100% by January 1, 2016. Under each option, delayed compliance is granted to fleet operators who have complied or will comply with requirements before the required deadlines.

On September 19, 2011 (effective December 14, 2011), the Executive Officer approved amendments to the regulations, including revisions to the compliance schedule for vehicles with a gross vehicle weight rating of 26,000 pounds or less to clarify that *all* vehicles must be equipped with 2010 model year emissions equivalent engines by 2023. The amendments included revised and additional credits for fleets that have downsized; implemented early particulate matter retrofits; incorporated hybrid vehicles, alternative-fueled vehicles, and vehicles with heavy-duty pilot ignition engines; and implemented early addition of newer vehicles. The amendments included provisions for additional flexibility, such as for low-usage construction trucks, and revisions to previous exemptions, delays, and extensions. Other amendments to the regulations included minor administrative changes to the regulatory text, including recordkeeping and reporting requirements related to other revisions.

California Health and Safety Code Section 41700

Section 41700 of the California Health and Safety Code states that a person shall not discharge from any source whatsoever quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any of those persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property. This section also applies to sources of objectionable odors.

Local

San Diego Air Pollution Control District

While CARB is responsible for the regulation of mobile emission sources within the state, local air quality management districts and air pollution control districts are responsible for enforcing standards and regulating stationary sources. The project site is located within the SDAB, which is under the jurisdiction of the SDAPCD, and is therefore, subject to the guidelines and regulations of SDAPCD. Federal and State attainment plans adopted by the SDAPCD are summarized below.

Federal Attainment Plans

SDAPCD has prepared the 2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County (2020 Attainment Plan) that demonstrates how the region will further reduce air pollutant

emissions to attain the current NAAQS for ozone. The 2020 Attainment Plan was approved by the SDAPCD on October 14, 2020. On November 19, 2020, CARB adopted the 2020 Attainment Plan for attaining the Federal 8-hour 75 ppb and 70 ppb Ozone standards and projects attainment for the standards by 2026 and 2032, respectively (SDAPCD 2020a). The 2020 Attainment Plan will be submitted to the EPA as a revision to the California State Implementation Plan (SIP) for attaining the ozone NAAQS.

In December 2016, the SDAPCD adopted an update to the Eight-Hour Ozone Attainment Plan for San Diego County (2008 O_3 NAAQS). The 2016 Final Eight-Hour Ozone Attainment Plan for San Diego County indicates that local controls and state programs would allow the region to reach attainment of the federal 8-hour O_3 standard (1997 O_3 NAAQS) by 2018 (SDAPCD 2016a). In this plan, SDAPCD relies on the Regional Air Quality Strategy (RAQS) to demonstrate how the region will comply with the federal O_3 standard. The RAQS details how the region will manage and reduce O_3 precursors (NO_x and VOCs) by identifying measures and regulations intended to reduce these pollutants. The control measures identified in the RAQS generally focus on stationary sources; however, the emissions inventories and projections in the RAQS address all potential sources, including those under the authority of CARB and EPA. Incentive programs for reduction of emissions from heavy-duty diesel vehicles, off-road equipment, and school buses are also established in the RAQS.

Currently, the County is designated as moderate nonattainment for the 2008 O_3 NAAQS and maintenance for the 1997 O_3 NAAQS. As documented in the 2016 Final Eight-Hour Ozone Attainment Plan for San Diego County, the County has a likely chance of obtaining attainment due to the transition to low emission cars, stricter new source review rules, and continuing the requirement of general conformity for military growth and the San Diego International Airport. SDAPCD will also continue emission control measures including ongoing implementation of existing regulations in ozone precursor reduction to stationary and area-wide sources, subsequent inspections of facilities and sources, and the adoption of laws requiring Best Available Retrofit Control Technology for control of emissions (SDAPCD 2016a).

State Attainment Plans

SDAPCD and the San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the SDAB. The RAQS for the SDAB was initially adopted in 1991 and is updated every 3 years. The RAQS outlines SDAPCD's plans and control measures designed to attain the CAAQS for O_3. The RAQS relies on information from CARB and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in the County and the cities in the County, to forecast future emissions and then determine from that the strategies necessary for the reduction of emissions through regulatory controls. The CARB mobile source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by the County and the cities in the County as part of the development of their general plans (SANDAG 2021a).

On March 9, 2023, SDAPCD adopted the 2022 Regional Air Quality Strategy (RAQS). The RAQS plan demonstrates how the San Diego region will further reduce air pollution emissions to meet state health-based standards for ground-level O_3. The 2022 RAQS guides the SDAPCD in deploying tools, strategies, and resources to continue reducing pollutants that are precursors to ground-level O_3, including NO_x and VOC. The 2022 RAQS emphasizes O_3 control measures but also identifies complementary measures and strategies that can reduce emissions of Greenhouse Gases (GHGs) and PM. It also includes new analyses exploring O_3 and its relationship to public health, mobile sources, under-resourced communities, and GHGs and climate change (SANDAG 2023). Further, the 2022 RAQS identifies strategies to expand SDAPCD regional partnerships, identify more opportunities to engage the

public and communities of concern, and integrate environmental justice and equity across all proposed measures and strategies.

Regarding particulate matter emissions reduction efforts, in December 2005, SDAPCD prepared a report titled "Measures to Reduce Particulate Matter in San Diego County" to address implementation of Senate Bill (SB) 656 in San Diego County (SB 656 required additional controls to reduce ambient concentrations of PM_{10} and $PM_{2.5}$) (SDAPCD 2005). In the report, SDAPCD evaluated the implementation of source-control measures that would reduce particulate matter emissions associated with residential wood combustion; various construction activities including earthmoving, demolition, and grading; bulk material storage and handling; carryout and trackout removal and cleanup methods; inactive disturbed land; disturbed open areas; unpaved parking lots/staging areas; unpaved roads; and windblown dust (SDAPCD 2005).

SDAPCD Rules and Regulations

As stated previously, SDAPCD is responsible for planning, implementing, and enforcing federal and state ambient standards in the SDAB. The following rules and regulations apply to all sources in the jurisdiction of SDAPCD:

- **SDAPCD Regulation II: Rule 10: Permits Required.** Requires an Authority to Construct and Permit to Operate for new stationary sources of air pollution (SDAPCD 1996).
- **SDAPCD Regulation IV: Prohibitions; Rule 50: Visible Emissions.** Prohibits any activity causing air contaminant emissions darker than 20% opacity for more than an aggregate of 3 minutes in any consecutive 60-minute time period. In addition, Rule 50 prohibits any diesel pile-driving hammer activity causing air contaminant emissions for a period or periods aggregating more than 4 minutes during the driving of a single pile (SDAPCD 1997).
- **SDAPCD Regulation IV: Prohibitions; Rule 51: Nuisance.** Prohibits the discharge, from any source, of such quantities of air contaminants or other materials that cause or have a tendency to cause injury, detriment, nuisance, annoyance to people and/or the public, or damage to any business or property (SDAPCD 1976).
- **SDAPCD Regulation IV: Prohibitions; Rule 55: Fugitive Dust.** Regulates fugitive dust emissions from any commercial construction or demolition activity capable of generating fugitive dust emissions, including active operations, open storage piles, and inactive disturbed areas, as well as track-out and carry-out onto paved roads beyond a project site (SDAPCD 2009).
- **SDAPCD Regulation IV: Prohibitions; Rule 67.0.1: Architectural Coatings.** Requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories (SDAPCD 2015).
- **SDAPCD Regulation IV: Prohibitions; Rule 67.7: Cutback and Emulsified Asphalts.** This rule prohibits manufacturers, distributors, and end users of cutback and emulsified asphalt materials for the paving, construction or maintenance of parking lots, driveways, streets and highways from applying asphalt material or road oils which contain more than 0.5 percent by volume VOC which evaporate at 260° C (500° F) or less (SDAPCD 1979).

San Diego Association of Governments

SANDAG is the regional planning agency for the County and serves as a forum for regional issues relating to transportation, the economy, community development, and the environment. SANDAG serves as the federally designated metropolitan planning organization for the County. With respect to air quality planning and other regional

issues, SANDAG has prepared San Diego Forward: The Regional Plan (Regional Plan) for the San Diego region (SANDAG 2015). The Regional Plan combines the big-picture vision for how the region will grow over the next 35 years with an implementation program to help make that vision a reality. The Regional Plan, including its Sustainable Communities Strategy (SCS), is built on an integrated set of public policies, strategies, and investments to maintain, manage, and improve the transportation system so that it meets the diverse needs of the San Diego region through 2050. The Regional Plan was updated in 2021, which was the result of years of planning, data analysis, and community engagement to reimagine the San Diego region with a transformative transportation system, a sustainable pattern of growth and development, and innovative demand and management strategies (SANDAG 2021a). The 2021 Regional Plan includes a SCS, which describes coordinated transportation and land use planning that exceeds the state's target for reducing per capita GHG emissions set by CARB. The state-mandated target is a 19% reduction—compared with 2005—in per capita GHG emissions from cars and light-duty trucks by 2035. The 2021 Regional Plan achieves a 20% reduction by then. The 2021 Regional Plan also puts forth a forecasted development pattern that is driven by regional goals for sustainability, mobility, housing affordability, and economic prosperity.

City of Chula Vista

Chula Vista General Plan

The City of Chula Vista General Plan was updated by the City on December 13, 2005, and most recently amended in 2020. The General Plan provides a long-term strategy to address planning issues for the growth and development of the City and is composed of the following six elements: land use and transportation, economic development, public facilities and services, growth management, environmental, and housing (City of Chula Vista 2005). The project site is located in the Bayfront Planning Area and Harbor District subarea of the General Plan (City of Chula Vista 2005). The policies for improving air quality in the General Plan are as follows:

Land Use and Transportation Element

Policy LUT-5.2: Encourage new development that is organized around compact, walkable, mixed-use neighborhoods and districts in order to conserve open space resources, minimize infrastructure costs, and reduce reliance on the automobile.

Policy LUT-16.1: Promote the development of well-planned communities that will tend to be selfsupportive and, thus, reduce the length of vehicular trips, reduce dependency on the automobile, and encourage the use of other modes of travel.

Policy LUT-23.1: Encourage the use of bicycles and walking as alternatives to driving.

Policy LUT-23.2: Foster the development of a system of inter-connecting bicycle routes throughout the City and region.

Policy LUT-23.5: Provide linkages between bicycle facilities that utilize circulation element alignments and open space corridors.

Policy LUT-23.8: Provide and maintain a safe and efficient system of sidewalks, trails, and pedestrian crossings.

Policy LUT-23.14: Require new development projects to provide internal bikeway systems with connections to the citywide bicycle networks.

Environmental Element

Policy E 6.1: Encourage compact development featuring a mix of uses that locate residential areas within reasonable walking distance to jobs, services, and transit.

Policy E 6.2: Promote and facilitate transit system improvements in order to increase transit use and reduce dependency on the automobile.

Policy E 6.3: Facilitate the use of alternative fuel and low- and zero-emission vehicles and equipment in the community.

Policy E 6.4: Do not site new or re-powered fossil-fueled baseload or peaking-type Electric Generating Facilities and other major toxic emitters within 1,000 feet of sensitive receptors, or site sensitive receptors within 1,000 feet of such facilities.

Policy E 6.5: Ensure Electrical Generating Facilities incorporate cleaner fuel sources and least polluting technologies in order to help transition the City to a less fossil fuel- dependent future, while meeting Chula Vista's energy demand.

Policy E 6.6: Explore incentives to promote voluntary air pollutant reductions, including incentives for developers who go above and beyond applicable requirements and for facilities and operations that are not otherwise regulated.

Policy E 6.7: Encourage innovative energy conservation practices and air quality improvements in new development and redevelopment projects consistent with the City's Air Quality Improvement Plan Guidelines or its equivalent, pursuant to the City's Growth Management Program.

Policy E 6.8: Encourage climate resilient design techniques in new buildings and infrastructure to reduce future risks from climate change-related impacts such as wildfires, extreme heat, and flooding.

Policy E 6.9: Discourage the use of landscaping equipment powered by two-stroke gasoline engines within the City and promote less-polluting alternatives to their use.

Policy E 6.10: The siting of new sensitive receivers within 500 feet of highways resulting from development or redevelopment projects shall require the preparation of a health risk assessment as part of the CEQA review of the project. Attendant health risks identified in the Health Risk Assessment (HRA) shall be feasibly mitigated to the maximum extent practicable, in accordance with CEQA, in order to help ensure that applicable federal and state standards are not exceeded.

Policy E 6.11: Develop strategies to minimize CO hot spots that address all modes of transportation.

Policy E 6.12: Promote clean fuel sources that help reduce the exposure of sensitive uses to pollutants.

Policy E 6.13: Encourage programs and infrastructure to increase the availability and usage of energy-efficient vehicles, such as hybrid electric vehicles, electric vehicles, or those that run on alternative fuels.

Policy E 6.14: Transition the City fleet to 100% "clean" vehicles by integrating hybrid and alternative fuel vehicles as current municipal fleet vehicles are replaced.

Policy E 6.15: Site industries: and other stationary emitters in a way that minimizes the potential impacts of poor air quality on homes, schools, hospitals, and other land uses where people congregate, and disadvantaged populations.

Policy E 6.16: Encourage the use of bicycles through support of bike share opportunities, community bike programs, and the provision of bicycle parking opportunities such as bike racks and bike lockers.

Policy E 6.B.1: Protect and develop shade tree cover along streets and within parking lots as a priority, particularly in new developments or tree-deficient areas.

Policy E 6.B.2: Preferentially plant female street trees to reduce pollen, especially in the most populated areas.

Policy E 6.B.3: Prioritize natural filtration, as opposed to impermeable hardscaping, within new development projects, along roadways, and adjacent to stream and river banks.

Policy E 6.B.4: Update the building code to support best practices in "green building" design, construction, and operations.

Policy E 6.B.5: Provide fast-track permitting for projects that implement "green building" design and construction.

Policy E 6.B.6: Encourage or require all new building construction to incorporate green roofs and encourage conversions of existing roof space to green roofs to reduce heat island effect.

Climate Action Plan

In September 2017, the City adopted its most recent Climate Action Plan (CAP). The CAP includes goals and policies to strengthen the City's climate action efforts that have been underway since 2000.

Chula Vista Bayfront Specific Plan

Chapter 19.81 of the CVMC defines the scope and purpose of the Bayfront Specific Plan. This chapter of the CVMC is intended to implement the Chula Vista General Plan and the Chula Vista Local Coastal Program (LCP) Land Use Plan (LUP) and their goals, objectives, and policies. Chapter 19.84 of the CVMC provides for the classification of land use and the regulation of development by land use and zoning parcel. The project is zoned as Industrial in the Bayfront Specific Plan. Chapter 19.85 of the CVMC outlines the development criteria for the Bayfront Specific Plan.

Chula Vista Bayfront Local Coastal Program Land Use Plan

The Chula Vista Bayfront LCP Amendment Bayfront Specific Plan was adopted in 2012 and amended in 2017. It governs the development of 722 acres of the City's bayfront. The LCP provides a detailed plan for the orderly growth, development, redevelopment, and conservation of the City jurisdictional parcels located within the Chula Vista Bayfront coastal area. Each coastal city and county's LCP is required to be pursuant to the California Coastal Act and approved by the California Coastal Commission. This LCP is consistent with the City General Plan and represents a step toward systematic implementation of the General Plan in the bayfront. The LUP provides land use and development policies to ensure that development within the bayfront will be consistent with the provisions of the California Coastal Act. The project site is within the Harbor District subarea, described in the LCP. The LUP outlines objectives and policies as the standard review for coastal development permits (City of Chula Vista 2012).

5.2.1.2 Existing Setting

The Project site is located within the boundaries of the San Diego Air Basin (SDAB). The SDAB is one of 15 air basins that geographically divide the State of California. The SDAB lies in the southwest corner of California and covers 4,260 square miles with the San Diego region.

Air pollutants are emitted by a variety of sources, including mobile sources (vehicles), area sources (hearths, consumer product use, architectural coatings, and landscape maintenance equipment), energy sources (natural gas), and stationary sources (generators or other stationary equipment). Some air pollutants need to be examined at the local level, and others are predominately an issue at the regional level. For instance, ozone (O_3) is formed in the atmosphere in the presence of sunlight by a series of chemical reactions involving oxides of nitrogen (NO_x) and reactive organic gas (ROG) (also termed volatile organic compounds (VOCs)). Because these reactions are broad scale in effects, O_3 is typically analyzed at the regional level (i.e., in the SDAB) rather than the local level. On the other hand, air pollutants such as coarse particulate matter (PM_{10}), fine particulate matter ($PM_{2.5}$), carbon monoxide (CO), and toxic air contaminants (TACs) are a potential concern in the immediate vicinity of the pollutant source because the pollutants are emitted directly by or are formed close to the source. Therefore, the study area for emissions of PM_{10}, $PM_{2.5}$, CO, and TACs is the local area near the source, such as in the vicinity of the Project Site, and the study area for regional pollutants such as NOx and ROGs is the entire SDAB.

Meteorological and Topographical Conditions

Air quality is a function of the rate and location of pollutant emissions under the influence of meteorological conditions and topographic features that influence pollutant movement and dispersal. Atmospheric conditions such as wind speed, wind direction, atmospheric stability, and air temperature gradients interact with the physical features of the landscape to determine the movement and dispersal of air pollutants, and consequently affect air quality.

The weather of the San Diego region, as in most of Southern California, is influenced by the Pacific Ocean and its semi-permanent high-pressure systems that result in dry, warm summers and mild, occasionally wet winters. The average temperature ranges (in degrees Fahrenheit) from the mid-40s to the high 90s. Most of the region's precipitation falls from November to April, with infrequent (approximately 10%) precipitation during the summer. The average seasonal precipitation along the coast is approximately 10 inches; the amount increases with elevation as moist air is lifted over the mountains (WRCC 2016).

The topography in the San Diego region varies greatly, from beaches on the west to mountains and desert on the east; along with local meteorology, it influences the dispersal and movement of pollutants in the basin. The mountains to the east prohibit dispersal of pollutants in that direction and help trap them in inversion layers.

The interaction of ocean, land, and the Pacific High-Pressure Zone maintains clear skies for much of the year and influences the direction of prevailing winds (westerly to northwesterly). Local terrain is often the dominant factor inland, and winds in inland mountainous areas tend to blow through the valleys during the day and down the hills and valleys at night.

The SDAB experiences frequent temperature inversions. Subsidence inversions occur during the warmer months as descending air associated with the Pacific High-Pressure Zone meets cool marine air. The boundary between the two layers of air creates a temperature inversion that traps pollutants. The other type of inversion, a radiation inversion, develops on winter nights when air near the ground cools by heat radiation and air aloft remains warm.

The shallow inversion layer formed between these two air masses also can trap pollutants. As the pollutants become more concentrated in the atmosphere, photochemical reactions occur that produce O_3, which contributes to the formation of smog. Smog is a combination of smoke and other particulates, O_3, hydrocarbons, oxides of nitrogen (NO_x) and other chemically reactive compounds which, under certain conditions of weather and sunlight, may result in a murky brown haze that causes adverse health effects (CARB 2023c).

Light daytime winds, predominantly from the west, further aggravate the condition by driving air pollutants inland, toward the mountains. During the fall and winter, air quality problems are created due to carbon monoxide (CO) and NO_x emissions. CO concentrations are generally higher in the morning and late evening. In the morning, CO levels are elevated due to cold temperatures and the large number of motor vehicles traveling. Higher CO levels during the late evenings are a result of stagnant atmospheric conditions trapping CO in the area. Since CO is produced almost entirely from automobiles, the highest CO concentrations in the SDAB are associated with heavy traffic. Nitrogen dioxide (NO_2) levels are also generally higher during fall and winter days.

Under certain conditions, atmospheric oscillation results in the offshore transport of air from the Los Angeles region to San Diego County. This often produces high O_3 concentrations, as measured at air pollutant monitoring stations within San Diego County. The transport of air pollutants from Los Angeles to San Diego has also occurred within the stable layer of the elevated subsidence inversion, where high levels of O_3 are transported.

Pollutants and Effects

Criteria Air Pollutants

Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. The federal and state standards have been set, with an adequate margin of safety, at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. Pollutants of concern include O_3, NO_2, CO, sulfur dioxide (SO_2), PM_{10}, $PM_{2.5}$, and lead. These pollutants are discussed in the following paragraphs.[1] In California, sulfates, vinyl chloride, hydrogen sulfide, and visibility-reducing particles are also regulated as criteria air pollutants.

Ozone (O_3). O_3 is a strong-smelling, pale blue, reactive, toxic chemical gas consisting of three oxygen atoms. It is a secondary pollutant formed in the atmosphere by a photochemical process involving the sun's energy and O_3 precursors. These precursors are mainly NO_x and VOCs. The maximum effects of precursor emissions on O_3 concentrations usually occur several hours after they are emitted and many miles from the source. Meteorology and terrain play major roles in O_3 formation, and ideal conditions occur during summer and early autumn on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. O_3 exists in the upper atmosphere O_3 layer (stratospheric O_3) and at the Earth's surface in the troposphere.[2] The O_3 that the U.S. Environmental Protection Agency (EPA) and the CARB regulate as a criteria air pollutant is produced close to the ground level, where people live, exercise, and breathe. Ground-level O_3 is a harmful air pollutant that causes numerous adverse health effects and is thus considered "bad" O_3. Stratospheric, or "good," O_3 occurs naturally in the upper

1 The following descriptions of health effects for each of the criteria air pollutants associated with project construction and operations are based on the U.S. Environmental Protection Agency's "Criteria Air Pollutants" (EPA 2022a) and the California Air Resources Board's "Glossary of Air Pollutant Terms" (CARB 2023c) published information.

2 The troposphere is the layer of the Earth's atmosphere nearest to the surface of the Earth. The troposphere extends outward about 5 miles at the poles and about 10 miles at the equator.

atmosphere, where it reduces the amount of ultraviolet light (i.e., solar radiation) entering the Earth's atmosphere. Without the protection of the beneficial stratospheric O_3 layer, plant and animal life would be seriously harmed.

O_3 in the troposphere causes numerous adverse health effects; short-term exposures (lasting for a few hours) to O_3 at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes (EPA 2013).

Inhalation of O_3 causes inflammation and irritation of the tissues lining human airways, causing and worsening a variety of symptoms. Exposure to O_3 can reduce the volume of air that the lungs breathe in, thereby causing shortness of breath. O_3 in sufficient doses increases the permeability of lung cells, rendering them more susceptible to toxins and microorganisms. The occurrence and severity of health effects from O_3 exposure vary widely among individuals, even when the dose and the duration of exposure are the same. Research shows adults and children who spend more time outdoors participating in vigorous physical activities are at greater risk from the harmful health effects of O_3 exposure. While there are relatively few studies on the effects of O_3 on children, the available studies show that children are no more or less likely to suffer harmful effects than adults. However, there are a number of reasons why children may be more susceptible to O_3 and other pollutants. Children and teens spend nearly twice as much time outdoors and engaged in vigorous activities as adults. Children breathe more rapidly than adults and inhale more pollution per pound of their body weight than adults. Also, children are less likely than adults to notice their own symptoms and avoid harmful exposures. Further research may be able to better distinguish between health effects in children and adults. Children, adolescents and adults who exercise or work outdoors, where O_3 concentrations are the highest, are at the greatest risk of harm from this pollutant (CARB 2023ca).

Nitrogen Dioxide (NO_2). NO_2 is a brownish, highly reactive gas that is present in all urban atmospheres. The major mechanism for the formation of NO_2 in the atmosphere is the oxidation of the primary air pollutant nitric oxide (NO), which is a colorless, odorless gas. NO_x plays a major role, together with VOCs, in the atmospheric reactions that produce O_3. NO_x is formed from fuel combustion under high temperature or pressure. In addition, NO_x is an important precursor to acid rain and may affect both terrestrial and aquatic ecosystems. The two major emissions sources are transportation and stationary fuel combustion sources such as electric utility and industrial boilers.

NO_2 can irritate the lungs, cause bronchitis and pneumonia, and lower resistance to respiratory infections (EPA 2022a). A large body of health science literature indicates that exposure to NO_2 can induce adverse health effects. The strongest health evidence, and the health basis for the ambient air quality standards for NO_2, results from controlled human exposure studies that show that NO_2 exposure can intensify responses to allergens in allergic asthmatics. In addition, a number of epidemiological studies have demonstrated associations between NO_2 exposure and premature death, cardiopulmonary effects, decreased lung function growth in children, respiratory symptoms, emergency room visits for asthma, and intensified allergic responses. Infants and children are particularly at risk because they have disproportionately higher exposure to NO_2 than adults due to their greater breathing rate for their body weight and their typically greater outdoor exposure duration. Several studies have shown that long-term NO_2 exposure during childhood, the period of rapid lung growth, can lead to smaller lungs at maturity in children with higher levels of exposure compared to children with lower exposure levels. In addition, children with asthma have a greater degree of airway responsiveness compared with adult asthmatics. In adults, the greatest risk is to people who have chronic respiratory diseases, such as asthma and chronic obstructive pulmonary disease (CARB 2023d).

Carbon Monoxide (CO). CO is a colorless, odorless gas formed by the incomplete combustion of hydrocarbon, or fossil fuels. CO is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and

trains. In urban areas, such as the Project location, automobile exhaust accounts for the majority of CO emissions. CO is a non-reactive air pollutant that dissipates relatively quickly; therefore, ambient CO concentrations generally follow the spatial and temporal distributions of vehicular traffic. CO concentrations are influenced by local meteorological conditions—primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, which is a typical situation at dusk in urban areas from November to February. The highest levels of CO typically occur during the colder months of the year, when inversion conditions are more frequent.

CO is harmful because it binds to hemoglobin in the blood, reducing the ability of blood to carry oxygen. This interferes with oxygen delivery to the body's organs. The most common effects of CO exposure are fatigue, headaches, confusion and reduced mental alertness, light-headedness, and dizziness due to inadequate oxygen delivery to the brain. For people with cardiovascular disease, short-term CO exposure can further reduce their body's already compromised ability to respond to the increased oxygen demands of exercise, exertion, or stress. Inadequate oxygen delivery to the heart muscle leads to chest pain and decreased exercise tolerance. Unborn babies whose mothers experience high levels of CO exposure during pregnancy are at risk of adverse developmental effects. Unborn babies, infants, elderly people, and people with anemia or with a history of heart or respiratory disease are most likely to experience health effects with exposure to elevated levels of CO (CARB 2023e).

Sulfur Dioxide (SO_2). SO_2 is a colorless, pungent gas formed primarily from incomplete combustion of sulfur-containing fossil fuels. The main sources of SO_2 are coal and oil used in power plants and industries; as such, the highest levels of SO_2 are generally found near large industrial complexes. In recent years, SO_2 concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO_2 and limits on the sulfur content of fuels.

Controlled human exposure and epidemiological studies show that children and adults with asthma are more likely to experience adverse responses with SO_2 exposure, compared with the non-asthmatic population. Effects at levels near the 1-hour standard are those of asthma exacerbation, including bronchoconstriction accompanied by symptoms of respiratory irritation such as wheezing, shortness of breath, and chest tightness, especially during exercise or physical activity. Also, exposure at elevated levels of SO_2 (above 1 parts per million [ppm]) results in increased incidence of pulmonary symptoms and disease, decreased pulmonary function, and increased risk of mortality. Older people and people with cardiovascular disease or chronic lung disease (such as bronchitis or emphysema) are most likely to experience these adverse effects (CARB 2023e).

SO_2 is of concern both because it is a direct respiratory irritant and because it contributes to the formation of sulfate and sulfuric acid in particulate matter (NRC 2005). People with asthma are of particular concern, both because they have increased baseline airflow resistance and because their SO_2-induced increase in airflow resistance is greater than in healthy people, and it increases with the severity of their asthma (NRC 2005). SO_2 is thought to induce airway constriction via neural reflexes involving irritant receptors in the airways (NRC 2005).

Particulate Matter (PM). Particulate matter pollution consists of very small liquid and solid particles floating in the air, which can include smoke, soot, dust, salts, acids, and metals. Particulate matter can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. $PM_{2.5}$ and PM_{10} represent fractions of particulate matter. Coarse particulate matter (PM_{10}) consists of particulate matter that is 10 microns or less in diameter and is about 1/7 the thickness of a human hair. Major sources of PM_{10} include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood-burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions. Fine particulate matter ($PM_{2.5}$) consists of

particulate matter that is 2.5 microns or less in diameter and is roughly 1/28 the diameter of a human hair. $PM_{2.5}$ results from fuel combustion (e.g., from motor vehicles and power generation and industrial facilities), residential fireplaces, and woodstoves. In addition, $PM_{2.5}$ can be formed in the atmosphere from gases such as sulfur oxides (SO_x), NO_x, and VOCs.

$PM_{2.5}$ and PM_{10} pose a greater health risk than larger-size particles. When inhaled, these tiny particles can penetrate the human respiratory system's natural defenses and damage the respiratory tract. $PM_{2.5}$ and PM_{10} can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances such as lead, sulfates, and nitrates can cause lung damage directly or be absorbed into the blood stream, causing damage elsewhere in the body. Additionally, these substances can transport adsorbed gases such as chlorides or ammonium into the lungs, also causing injury. Whereas PM_{10} tends to collect in the upper portion of the respiratory system, $PM_{2.5}$ is so tiny that it can penetrate deeper into the lungs and damage lung tissue. Suspended particulates also damage and discolor surfaces on which they settle and produce haze and reduce regional visibility.

A number of adverse health effects have been associated with exposure to both $PM_{2.5}$ and PM_{10}. For $PM_{2.5}$, short-term exposures (up to 24-hour duration) have been associated with premature mortality, increased hospital admissions for heart or lung causes, acute and chronic bronchitis, asthma attacks, emergency room visits, respiratory symptoms, and restricted activity days. These adverse health effects have been reported primarily in infants, children, and older adults with preexisting heart or lung diseases. In addition, of all of the common air pollutants, $PM_{2.5}$ is associated with the greatest proportion of adverse health effects related to air pollution, both in the United States and worldwide based on the World Health Organization's Global Burden of Disease Project. Short-term exposures to PM_{10} have been associated primarily with worsening of respiratory diseases, including asthma and chronic obstructive pulmonary disease, leading to hospitalization and emergency department visits (CARB 2023f).

Long-term exposure (months to years) to $PM_{2.5}$ has been linked to premature death, particularly in people who have chronic heart or lung diseases, and reduced lung function growth in children. The effects of long-term exposure to PM_{10} are less clear, although several studies suggest a link between long-term PM_{10} exposure and respiratory mortality. The International Agency for Research on Cancer published a review in 2015 that concluded that particulate matter in outdoor air pollution causes lung cancer (CARB 2023f).

Lead. Lead in the atmosphere occurs as particulate matter. Sources of lead include leaded gasoline; the manufacturing of batteries, paints, ink, ceramics, and ammunition; and secondary lead smelters. Prior to 1978, mobile emissions were the primary source of atmospheric lead. Between 1978 and 1987, the phaseout of leaded gasoline reduced the overall inventory of airborne lead by nearly 95%. With the phaseout of leaded gasoline, secondary lead smelters, battery recycling, and manufacturing facilities are becoming lead-emissions sources of greater concern.

Prolonged exposure to atmospheric lead poses a serious threat to human health. Health effects associated with exposure to lead include gastrointestinal disturbances, anemia, kidney disease, and in severe cases, neuromuscular and neurological dysfunction. Of particular concern are low-level lead exposures during infancy and childhood. Such exposures are associated with decrements in neurobehavioral performance, including IQ performance, psychomotor performance, reaction time, and growth. Children are highly susceptible to the effects of lead.

Volatile Organic Compounds (VOCs). Hydrocarbons are organic gases that are formed from hydrogen and carbon and sometimes other elements. Hydrocarbons that contribute to formation of O_3 are referred to and regulated as

VOCs (also referred to as reactive organic gases). Combustion engine exhaust, oil refineries, and fossil-fueled power plants are the sources of hydrocarbons. Other sources of hydrocarbons include evaporation from petroleum fuels, solvents, dry-cleaning solutions, and paint.

The primary health effects of VOCs result from the formation of O_3 and its related health effects. High levels of VOCs in the atmosphere can interfere with oxygen intake by reducing the amount of available oxygen through displacement. Carcinogenic forms of hydrocarbons, such as benzene, are considered TACs.

Sulfates. Sulfates are the fully oxidized form of sulfur, which typically occur in combination with metals or hydrogen ions. Sulfates are produced from reactions of SO_2 in the atmosphere and can result in respiratory impairment, as well as reduced visibility.

Vinyl Chloride. Vinyl chloride is a colorless gas with a mild, sweet odor, which has been detected near landfills, sewage plants, and hazardous waste sites, due to the microbial breakdown of chlorinated solvents. Short-term exposure to high levels of vinyl chloride in air can cause nervous system effects, such as dizziness, drowsiness, and headaches. Long-term exposure through inhalation can cause liver damage, including liver cancer.

Hydrogen Sulfide. Hydrogen sulfide is a colorless and flammable gas that has a characteristic odor of rotten eggs. Sources of hydrogen sulfide include geothermal power plants, petroleum refineries, sewers, and sewage treatment plants. Exposure to hydrogen sulfide can result in nuisance odors, as well as headaches and breathing difficulties at higher concentrations.

Visibility-Reducing Particles. Visibility-reducing particles are any particles in the air that obstruct the range of visibility. Effects of reduced visibility can include obscuring the viewshed of natural scenery, reducing airport safety, and discouraging tourism. Sources of visibility-reducing particles are the same as for $PM_{2.5}$.

Non-Criteria Pollutants

Toxic Air Contaminants (TACs). A substance is considered toxic if it has the potential to cause adverse health effects in humans, including increasing the risk of cancer upon exposure, or acute and/or chronic noncancer health effects. A toxic substance released into the air is considered a TAC. TACs are identified by federal and state agencies based on a review of available scientific evidence. In the State of California, TACs are identified through a two-step process that was established in 1983 under the Toxic Air Contaminant Identification and Control Act. This two-step process of risk identification and risk management and reduction was designed to protect residents from the health effects of toxic substances in the air. In addition, the California Air Toxics “Hot Spots” Information and Assessment Act, Assembly Bill (AB) 2588, was enacted by the legislature in 1987 to address public concern over the release of TACs into the atmosphere. The law requires stationary sources to report the types and quantities of certain substances routinely released into the air. The goals of the Air Toxics "Hot Spots" Act are to collect emission data, to identify facilities having localized impacts, to ascertain health risks, to notify nearby residents of significant risks, and to reduce those significant risks to acceptable levels.

Examples include certain aromatic and chlorinated hydrocarbons, certain metals, and asbestos. TACs are generated by several sources, including stationary sources such as dry cleaners, gas stations, combustion sources, and laboratories; mobile sources such as automobiles; and area sources such as landfills. Adverse health effects associated with exposure to TACs may include carcinogenic (i.e., cancer-causing) and noncarcinogenic effects. Noncarcinogenic effects typically affect one or more target organ systems and may be experienced on either short-term (acute) or long-term (chronic) exposure to a given TAC.

Diesel Particulate Matter (DPM). DPM is part of a complex mixture that makes up diesel exhaust. Diesel exhaust is composed of two phases, gas and particle, both of which contribute to health risks. More than 90% of DPM is less than 1 micrometer in diameter (about 1/70th the diameter of a human hair), and thus is a subset of $PM_{2.5}$ (CARB 2023g). DPM is typically composed of carbon particles ("soot," also called black carbon) and numerous organic compounds, including over 40 known cancer-causing organic substances. Examples of these chemicals include polycyclic aromatic hydrocarbons, benzene, formaldehyde, acetaldehyde, acrolein, and 1,3-butadiene (CARB 2023g). CARB classified "particulate emissions from diesel-fueled engines" (i.e., DPM) as a TAC in August 1998 (17 CCR 93000). DPM is emitted from a broad range of diesel engines: on-road diesel engines of trucks, buses, and cars and off-road diesel engines including locomotives, marine vessels, and heavy-duty construction equipment, among others. Approximately 70% of all airborne cancer risk in California is associated with DPM (CARB 2000). To reduce the cancer risk associated with DPM, California Air Resources Board (CARB) adopted a diesel risk reduction plan in 2000 (CARB 2000). Because it is part of $PM_{2.5}$, DPM also contributes to the same non-cancer health effects as $PM_{2.5}$ exposure. These effects include premature death; hospitalizations and emergency department visits for exacerbated chronic heart and lung disease, including asthma; increased respiratory symptoms; and decreased lung function in children. Several studies suggest that exposure to DPM may also facilitate development of new allergies (CARB 2023g). Those most vulnerable to non-cancer health effects are children whose lungs are still developing and the elderly who often have chronic health problems.

Odorous Compounds. Odors are generally regarded as an annoyance rather than a health hazard. Manifestations of a person's reaction to odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting and headache). The ability to detect odors varies considerably among the population and overall is quite subjective. People may have different reactions to the same odor. An odor that is offensive to one person may be perfectly acceptable to another (e.g., coffee roaster). An unfamiliar odor is more easily detected and is more likely to cause complaints than a familiar one. In a phenomenon known as odor fatigue, a person can become desensitized to almost any odor, and recognition may only occur with an alteration in the intensity. The occurrence and severity of odor impacts depend on the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of receptors.

Valley Fever. Coccidioidomycosis, more commonly known as "Valley Fever," is an infection caused by inhalation of the spores of the *Coccidioides immitis* fungus, which grows in the soils of the southwestern United States.

San Diego County (County) is not considered a highly endemic region for Valley Fever, as the latest report from the County of San Diego Health and Human Services Agency Public Health Services indicated the County has 6.3 cases per 100,000 people (County of San Diego 2021). In the zip code area of the Project site (91910), the case rate is reported as 11.9 cases per 100,000 people (County of San Diego 2021).

Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. People most likely to be affected by air pollution, as identified by the California Air Resources Board (CARB), include children, older adults, and people with cardiovascular and chronic respiratory diseases. According to the SDAPCD, sensitive receptors are those who are especially susceptible to adverse health effects from exposure to toxic air contaminants, such as children, the elderly, and the ill. Sensitive receptors include residences, schools (grades Kindergarten through 12), libraries, day care centers, nursing homes, retirement homes, health clinics, and hospitals within 2 kilometers of the facility (SDAPCD 2022c). The closest sensitive receptors to the project site are existing multi-family residences east of I-5, east of the project site's boundaries.

Sensitive receptors located within 1,000 feet of the project site include:

- Multi-family residences east of I-5, approximately 430 feet east of the project site's eastern boundary. (closest sensitive receptor)
- Holiday Gardens multi-family residences, east of I-5, approximately 640 feet east of the project site's eastern boundary.
- Cabrillo Mobile Home Lodge east of I-5, approximately 435 feet northeast of the project site's eastern boundary.
- Bison Mobile Home Park east of I-5, approximately 560 feet southeast of project site's eastern boundary.

In addition, Mueller Charter School is located 1,130 feet southeast of project site's eastern boundary.

5.2.2 Thresholds of Significance

The significance criteria used to evaluate the Project impacts to air quality is based on the recommendations provided in Appendix G of the CEQA Guidelines. For the purposes of this air quality analysis, a significant impact would occur if the Project would (14 CCR 15000 et seq.):

A. Conflict with or obstruct implementation of the applicable air quality plan.
B. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.
C. Expose sensitive receptors to substantial pollutant concentrations.
D. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) indicates that, where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to determine whether the Project would have a significant impact on air quality.

South Coast Air Quality Management District

The City of Chula Vista has chosen to use emissions-based thresholds from the SCAQMD to address the significance of air quality impacts resulting from projects subject to CEQA environmental review. A project would result in a substantial contribution to an existing air quality violation of the National Ambient Air Quality Standards (NAAQS) or California Ambient Air Quality Standards (CAAQS) for O_3, which is a nonattainment pollutant, if the project's construction emissions would exceed SCAQMD's VOC or NO_x significance thresholds shown in Table 5.2-4. These emission-based thresholds for O_3 precursors are intended to serve as a surrogate for an "ozone significance threshold" (i.e., the potential for adverse O_3 impacts to occur) because O_3 itself is not emitted directly, and the effects of an individual project's emissions of O_3 precursors (VOC and NO_x) on O_3 levels in ambient air cannot be determined through air quality models or other quantitative methods.

Table 5.2-4. SCAQMD Air Quality Significance Thresholds

Criteria Pollutants Mass Daily Thresholds		
Pollutant	Construction (Pounds per Day)	Operation (Pounds per Day)
VOCs	75	55
NO_x	100	55

Table 5.2-4. SCAQMD Air Quality Significance Thresholds

Criteria Pollutants Mass Daily Thresholds		
Pollutant	**Construction (Pounds per Day)**	**Operation (Pounds per Day)**
CO	550	550
SO_x	150	150
PM_{10}	150	150
$PM_{2.5}$	55	55
Lead[a]	3	3

Source: SCAQMD 2023
Notes: SCAQMD = South Coast Air Quality Management District; VOCs = volatile organic compounds; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter.
GHG emissions thresholds for industrial proposed projects, as added in the March 2015 revision to the SCAQMD Air Quality Significance Thresholds, were not included in Table 5.2-4 as they will be addressed within the GHG emissions analysis and not the air quality study.
[a] The phaseout of leaded gasoline started in 1976. Since gasoline no longer contains lead, the project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

Approach and Methodology

The California Emissions Estimator Model (CalEEMod) Version 2022.1 was used to estimate emissions from construction and operation of the project (CAPCOA 2022) as well as existing emissions. CalEEMod is a statewide computer model developed in cooperation with air districts throughout the state to quantify criteria air pollutant and GHG emissions associated with construction activities and operation of a variety of land use projects, such as residential, commercial, and industrial facilities. CalEEMod input parameters, including the land use type used to represent the project and its size, construction schedule, and anticipated use of construction equipment, were based on information provided by the project applicant and default model assumptions if project specifics were unavailable. Table 5.2-5 provides a summary of the land use inputs included in the CalEEMod modeling for construction and operation of the project.

Table 5.2-5. CalEEMod Land Use Development Summary for the Proposed Project

Planning Area	Project Component	CalEEMod Land Use Type	Land Use Amount (Size)	Land Use Size Metric	Building Square Footage	Land Use Acreage
A	Industrial/Business Park (w/commercial)	Industrial Park	198	ksf	198,000	9.29
	Parking	Parking Lot	2	Ac	0	
	Trucks associated with business park uses	User Defined Commercial	1	User Defined	0	0
B-1	Industrial/Business Park (w/commercial)	Industrial Park	470	ksf	470,000	26.13
	Parking	Parking Lot	793	sp	0	
	Miscellaneous surface areas (walkways, landscaped slopes,	Other Asphalt Surfaces	8.2	ac	0	

Table 5.2-5. CalEEMod Land Use Development Summary for the Proposed Project

Planning Area	Project Component	CalEEMod Land Use Type	Land Use Amount (Size)	Land Use Size Metric	Building Square Footage	Land Use Acreage
	loading/unloading areas, etc.)					
	Trucks associated with business park uses	User Defined Industrial	1	User Defined	0	0
B-2	Resort Hotel	Hotel	175	rm	254,100	9.36
	Quality Restaurant	Quality Restaurant	36	Ksf	36,000	
	Parking	Parking Lot	2	ac	0	

Notes: ksf = 1,000 square feet; ac = acre, rm = rooms, sp = parking space

As noted previously, the project site is being redeveloped. Planning Area A will not have any construction emissions associated but will re-purpose the existing building through a rezoning. Table 5.2-6 provides a summary of the existing land uses on the project site and the CalEEMod parameters used to estimate existing emissions.

Table 5.2-6. CalEEMod Land Use Development Summary for the Existing Site

Planning Area	Existing Uses	CalEEMod Land Use Type	Land Use Amount (Size)	Land Use Size Metric	Building Square Footage	Land Use Acreage
A	Warehousing	Warehouse	231.174	ksf	231,174	9.29
B-1	Manufacturing/Assembly	Manufacturing	601.225	ksf	601,225	26.13
B-2	Manufacturing/Assembly	Manufacturing	165,612	ksf	165,612	9.36

Notes: Manufacturing uses on Planning Areas B-1 and B-2 continued as recently as 2020.

Construction Emissions

Criteria air pollutant emissions associated with construction of the project were estimated using CalEEMod for the following emission sources: operation of off-road construction equipment, fugitive dust, VOC off-gassing from paving and architectural coating, on-road hauling, and vendor (material delivery) trucks, and worker vehicles. Construction scenario assumptions, including phasing, equipment mix, and vehicle trips, were based on CalEEMod default values with an estimated construction start date in August 2024 and buildout completed in September 2029. As noted previously, Planning Area A is already built-out and is only requiring rezoning. Accordingly, no construction emissions for Planning Area A have been estimated and included in the analysis.

Table 5.2-7 provides a summary of the project construction schedule. The construction schedule used in the analysis represents a "worst-case" analysis scenario since emission factors for construction equipment decrease as the analysis year increases due to improvements in technology and more stringent regulatory requirements. The duration of construction activity and associated equipment represents a reasonable approximation of the expected

construction fleet as required pursuant to CEQA guidelines. Additionally, Planning Area A is already built-out and is only requiring rezoning. Therefore, Planning Area A is not included in the construction schedule below.

Table 5.2-7. Project Construction Schedule

Planning Area	Construction Task	Start Date	End Date	Workdays
B-1	Site Preparation	8/5/2024	8/30/2024	20
	Grading	9/2/2024	11/1/2024	45
	Building Construction	11/4/2024	7/10/2026	440
	Paving	7/13/2026	8/28/2026	35
	Architectural Coating	8/31/2026	10/16/2026	35
B-2	Grading	8/1/2028	8/28/2028	20
	Building Construction	8/29/2028	7/16/2029	230
	Paving	7/17/2029	8/13/2029	20
	Architectural Coating	8/14/2029	9/10/2029	20

Source: CalEEMod, Appendix C

CalEEMod default trip length values were used for the distances for worker (11.97 miles), vendor truck (7.63 miles), and haul truck trips (20 miles). In addition, it was assumed that one onsite truck would be present to water exposed and unpaved roads on the project site. The water truck was assumed to water surfaces and unpaved roads up to two times per day with up to 0.25 mile per onsite trip. It was also assumed that heavy construction equipment would be operating at the site for approximately 5 days per week (22 days per month) during project construction. Construction scenario assumptions, including phasing, vehicle trips, and equipment mix, used for estimating project-generated construction emissions are shown in Table 5.2-8.

Table 5.2-8. Construction Scenario Assumptions

		Daily One-Way Vehicle Trips				Equipment		
PA	Task	Workers	Vendors	Haul Trucks	Onsite Trucks	Equipment Type (HP)	Quantity	Daily Usage Hours
B-1	Site Preparation	18	2	0	4	Rubber Tired Dozers (367)	3	8
						Tractors/Loaders/ Backhoes (84)	4	8
	Grading	20	2	140	4	Graders (148)	1	8
						Excavators (36)	2	8
						Tractors/Loaders Backhoes (84)	2	8
						Scrapers (423)	2	8
						Rubber Tired Dozers (367)	1	8
	Building Construction	198	78	0	0	Forklifts (82)	3	8
						Generator Sets (14)	1	
						Cranes (367)	1	

Table 5.2-8. Construction Scenario Assumptions

PA	Task	Daily One-Way Vehicle Trips				Equipment		
		Workers	Vendors	Haul Trucks	Onsite Trucks	Equipment Type (HP)	Quantity	Daily Usage Hours
						Welders (46)	1	
						Tractors/Loaders Backhoes (84)	3	
	Paving	16	2	0	0	Pavers (81)	2	8
						Paving Equipment (89)	2	8
						Rollers (36)	2	8
	Architectural Coating	40	2	0	0	Air Compressors (37)	1	6
B-2	Grading	16	6	0	4	Graders (148)	1	8
						Excavators (36)	1	8
						Tractors/Loaders Backhoes (84)	3	8
						Rubber Tired Dozers (367)	1	8
	Building Construction	292	150	0	0	Forklifts (82)	3	8
						Generator Sets (14)	1	8
						Cranes (367)	1	7
						Welders (46)	1	8
						Tractors/Loaders Backhoes (84)	3	7
	Paving	16	2	0	0	Pavers (81)	2	8
						Paving Equipment (89)	2	8
						Rollers (36)	2	8
	Architectural Coating	20	2	0	0	Air compressors (37)	1	6

Source: CalEEMod, Appendix C
Notes: CalEEMod generates default construction phases, schedule durations, and equipment mix based on user inputs in the Land Use module (see Table 5.2-5) based on South Coast Air Quality Management District construction surveys.
PA = Planning Area; HP = horsepower

Construction of the project would be subject to SDAPCD Rule 55 – Fugitive Dust Control. This rule requires that construction of project components include steps to restrict visible emissions of fugitive dust beyond the property line (SDAPCD 2009b). Compliance with Rule 55 would limit fugitive dust (PM_{10} and $PM_{2.5}$) that may be generated during grading and construction activities. To reflect implementation of proposed dust control strategies, it was assumed that the exposed areas would be watered two times per day (61% reduction in PM_{10} and $PM_{2.5}$).

Operational Emissions

Project-generated operational criteria air pollutant emissions were estimated for area sources, energy sources, and mobile sources using CalEEMod. The first full year of operations was assumed to be 2030, consistent with the anticipated end of construction. This provides a conservative estimate as emissions would decrease as the buildout year increase because of improved vehicle technologies and more stringent regulations. The calculation of area, energy, and mobile air pollutant emissions is explained below.

Area Sources

CalEEMod was used to estimate operational emissions from area sources, including emissions from consumer product use, architectural coatings, and landscape maintenance equipment. Emissions associated with natural gas usage in space heating and water heating are calculated in the building energy use module of CalEEMod, as described in the following text.

Consumer products are chemically formulated products used by household and institutional consumers, including detergents; cleaning compounds; polishes; floor finishes; cosmetics; personal care products; home, lawn, and garden products; disinfectants; sanitizers; aerosol paints; and automotive specialty products. Other paint products, furniture coatings, or architectural coatings are not considered consumer products (CAPCOA 2022). Consumer product VOC emissions are estimated in CalEEMod based on the floor area of nonresidential buildings and on the default factor of pounds of VOC per building square foot per day. For parking lot land uses, CalEEMod estimates VOC emissions associated with use of parking surface degreasers based on a square footage of parking surface area and pounds of VOC per square foot per day.

VOC off-gassing emissions result from evaporation of solvents contained in surface coatings such as in paints and primers using during building maintenance. CalEEMod calculates the VOC evaporative emissions from application of nonresidential surface coatings based on the VOC emission factor, the building square footage, the assumed fraction of surface area, and the reapplication rate. The VOC emission factor is based on the VOC content of the surface coatings, and SDAPCD Rule 67.0.1 (Architectural Coatings) governs the VOC (or ROG) content for interior and exterior coatings, which is 50 grams per liter VOC for the interiors and exteriors of the buildings. The CalEEMod default of 100 grams per liter was assumed for parking area coatings. The model default reapplication rate of 10% of area per year is assumed. Consistent with CalEEMod defaults, it is assumed that the nonresidential surface area for painting equals 2.0 times the floor square footage, with 75% assumed for interior coating and 25% assumed for exterior surface coating (CAPCOA 2022). For the parking lot, the architectural coating area is assumed to be 6% of the total square footage, consistent with the supporting CalEEMod studies provided as an appendix to the CalEEMod User's Guide (CAPCOA 2022).

Landscape maintenance includes fuel combustion emissions from equipment such as lawn mowers, rototillers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers. The emissions associated from landscape equipment use are estimated based on CalEEMod default values for emission factors (grams per square foot of nonresidential building space per day) and number of summer days (when landscape maintenance would generally be performed) and winter days. For San Diego County, the average annual "summer" days are estimated to 365 days; however, it is assumed that landscaping equipment would likely only operate during the week (not weekends), so operational days were assumed to be 180 days per year in CalEEMod (CAPCOA 2022).

Energy Sources

As represented in CalEEMod, energy sources include emissions associated with natural gas usage. Electricity use would contribute indirectly to criteria air pollutant emissions; however, the emissions from electricity use are only quantified for GHGs in CalEEMod, since criteria pollutant emissions occur at the site of the power plant, which is typically off site.

The energy use from nonresidential land uses (natural gas usage per square foot per year) is calculated in CalEEMod based on the California Commercial End-Use Survey database and the energy use from residential land uses is calculated in CalEEMod based on the Residential Appliance Saturation Study. The current version of CalEEMod assumes compliance with the 2019 Title 24 Building Energy Efficiency Standards (CAPCOA 2022). However, construction of the proposed Project would be required to comply with the 2022 Title 24 Standards at a minimum and depending on timing of full project buildout, may be required to comply with future, more stringent energy codes.

The project may include some refrigeration uses, as such the industrial/business park with commercial land uses were modeled based on the estimated energy use from a refrigerated warehouse to provide a conservative estimate of potential future energy use as non-refrigerated industrial buildings would require less energy.

Mobile Sources

The project would generate criteria pollutant emissions from mobile sources (vehicular traffic) because of the passenger vehicle trips associated with the industrial/business park with commercial, hotel, and restaurant uses (i.e., employees, customers, deliveries).

Emissions from the mobile sources during operation of the project were estimated in CalEEMod. Mizuta Traffic Consulting. provided daily trips for vehicles. Because there may be additional truck traffic associated with the proposed industrial/business park with commercial land use for Planning Area B-1, Mizuta Traffic provided a breakdown of truck trips by axle-type based on the South Coast Air Quality Management District's (SCAQMD) Warehouse Truck Trip Study Data Results and Usage (SCAQMD 2014). Planning Area A includes up to 198,000 square feet of industrial/business park with commercial uses, similar to the land uses included in Planning Area B-1, as such the same passenger vehicle versus truck percent breakdown and truck breakdown by axle was applied to Planning Area A. Planning Area B-2 would include potential hotel and restaurant uses, which would not result in higher truck trips than the CalEEMod default fleet mix, as such the default fleet mix was used for Planning Area B-2. Table 5.2-9 provides a summary of the project trip generation and vehicle fleet breakdown for the Planning Areas.

Table 5.2-9. Project Trip Generation

Planning Area	Vehicle Type	Average Daily Trips	Notes
A	Passenger Cars	2,900	Includes LDA, LDT1, LDT2, MDV
	Trucks	268	2-axle (16.7%); 3-axle (20.7%); 4+axle (62.6%)
	All	3,168	
B-1	Passenger Cars	6,884	Includes LDA, LDT1, LDT2, MDV
	Trucks	636	2-axle (16.7%); 3-axle (20.7%); 4+axle (62.6%)
	All	7,520	

Table 5.2-9. Project Trip Generation

Planning Area	Vehicle Type	Average Daily Trips	Notes
B-2	All	5,000	
All	**All**	**15,688**	

Source: Mizuta Traffic Consulting 2023.
Notes: LDA = Light Duty Auto, LDT1 = Light-Duty Trucks (0-3,750 pounds), LDT2 = Light Duty Trucks (3,75-5,750 pounds), MDV = Medium-Duty Trucks (5,751-8,500 pounds), 2-axle trucks (5,801 – 14,000 pounds), 3-axle trucks (14,001-33,000 pounds), 4+axle trucks (33,001-60,000 pounds)

The commercial passenger vehicle trip lengths were assumed to be CalEEMod default trip lengths of 9.93 miles home-work trips, 6.68 miles for work-other trips, and 6.12 miles for other-other trips. A home-work trip represents trips traveling in either direction between home and work locations. A work-other trip is made by an employee traveling in either direction between a work location and all other locations that are not home. An other-other trip is made by a person traveling in either direction between land uses that do not involve home or work locations (e.g. school, park, gym).

The light-duty, medium-heavy-duty, and heavy-duty truck trip lengths were based on weighted trip length using EMFAC data on regional trip distances and the SCAQMD 2014 Survey The weighted trip length was estimated to be 15.59 miles. Additionally, truck trips were assumed to be 100% primary trips. Vehicle emissions occur during startup, operation (running), and idling, as well as from evaporative losses when the engines are resting. The emissions factors for trucks and passenger vehicles were determined using CalEEMod.

Project truck idling would be limited to 5 minutes in accordance with CARB's adopted Airborne Toxic Control Measure; however, for modeling purposes, it was conservatively assumed that the trucks would idle for a total of 15 minutes: 5 minutes at the entrance, 5 minutes at the loading dock, and 5 minutes at the exit of the project site.

Vehicle emissions occur during startup, operation (running), and idling, as well as from evaporative losses when the engines are resting. The emissions factors for motor vehicles were determined using CalEEMod defaults.

The Local Mobility Analysis prepared by Mizuta Traffic Consulting included trip generation from existing uses on the project site that would be replaced by the project. Table 5.2-10 provides a summary of the existing vehicle trips.

Table 5.2-10. Existing Project Site Trip Generation

Planning Area	Vehicle Type	Average Daily Trips
A	All	1,156
B-1	All	2,405
B-2	All	663
Total	**All**	**4,224**

Notes: Manufacturing uses on Planning Areas B-1 and B-2 continued as recently as 2020. Trip generation for existing uses passed on Rohr Wohl Local Mobility Analysis prepared by Mizuta Traffic Consulting (July 2023).

Off-Road Equipment

Planning Areas A and B-1 may include some industrial uses such as warehousing. It is common for industrial buildings to require cargo handling equipment to move empty containers and empty chassis to and from the various pieces of cargo handling equipment that receive and distribute containers. The most common type of cargo

handling equipment are forklifts, pallet jacks, and yard trucks, which are designed for moving cargo containers. Yard trucks are also known as yard goats, utility tractors, hustlers, yard hostlers, and yard tractors. The SCAQMD published a summary of operational survey results from 34 operating high-cube warehouses (SCAQMD 2014). The SCAQMD survey reported an average of 0.12 forklifts/pallet jacks per 1,000 square feet of building area, which was applied to the project. This estimate is for total forklifts and pallet jacks. Pallet jacks are small as they are primarily used to lift small loads in tight quarters (and are electric or manual); therefore, assuming all pieces of equipment are forklifts is conservative. The SCAQMD study also identified 3.6 yard trucks per 1 million square feet. For this project, based on the maximum square footage of building space permitted by the project, on-site modeled operational equipment includes a total of 56 forklifts for Planning Area B-1 and 24 forklifts for Planning Area A for a total of 80 forklifts. In addition, one yard truck each was assumed for Planning Area A and B-1. Of the total 80 forklifts, approximately half were assumed to be electric with the remaining modeled as diesel with Tier 4 compliant engines. The yard trucks were assumed to be diesel. See Appendix C for detail calculations.

Stationary Sources

A stationary source is defined as any building, structure, facility, or installation which emits or may emit any pollutants. Planning Areas A and B-1 may include refrigerated uses; accordingly, back-up generators may be required during emergency outages. One 500-hp emergency back-up generator was included for each building in Planning Areas with potential refrigerated uses (A and B-1). Emergency backup diesel generators are considered stationary sources and subject to permitting from the SDAPCD. The modeling assumed the generators would be consistent with statewide average emission factors for a 2030 operational year and would operate up to 50 hours annually.

Health Risk Assessment

Construction Health Risk Assessment

An HRA was performed to evaluate potential health risk associated with construction of the project. The following discussion summarizes the dispersion modeling and HRA methodology; supporting construction HRA documentation, including detailed assumptions, is presented in Appendix C.

For risk assessment purposes, PM_{10} in diesel exhaust is considered DPM, originating mainly from off-road equipment operating at a defined location for a given length of time at a given distance from sensitive receptors. Less-intensive, more-dispersed emissions result from on road vehicle exhaust (e.g., heavy-duty diesel trucks). For the construction HRA, the CalEEMod scenario for the project was adjusted to reduce diesel truck one-way trip distances to 1,320 feet (0.25 miles) to estimate emissions from truck pass-by at proximate receptors. The air dispersion modeling methodology was based on SDAPCD's accepted modeling practices (SDAPCD 2022c). Air dispersion modeling was performed using the EPA's American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD) Version 22112 modeling system (computer software) with the Lakes Environmental Software implementation/user interface, AERMOD View Version 11.2.0 (EPA 2022b). The HRA followed the Office of Environmental Health Hazard Assessment (OEHHA) 2015 guidelines (OEHHA 2015) and SDAPCD guidance to calculate the health risk impacts at all proximate receptors as further discussed below. The dispersion modeling included the use of standard regulatory default options. AERMOD parameters were selected consistent with the SDAPCD and EPA guidance and identified as representative of the Project site and Project activities. Principal parameters of this modeling are presented in Table 5.2-11.

Table 5.2-11. American Meteorological Society/Environmental Protection Agency Regulatory Model Principal Parameters

Parameter	Details
Meteorological Data	The SDAPCD was consulted to obtain the most representative meteorological data set for the project site. The SDAPCD provided meteorological data for the Chula Vista meteorological station, which was located at 84 East J Street in Chula Vista, approximately 2.5 miles east of the project site. The latest three-year data set from the Chula Vista station was for the 2010-2012 years.
Urban versus Rural Option	Rural dispersion option was selected due to the close proximity to the coastline. The rural dispersion option is the modeling default for San Diego County (SDAPCD 2022c).
Terrain Characteristics	Digital elevation model files were imported into AERMOD so that complex terrain features were evaluated as appropriate for the site. This accounts for complex terrain within 2 kilometers of the site. The National Elevation Dataset (NED) dataset with resolution of 1 arc-second was used. The AERMAP terrain preprocessor, which can process U.S. Geological Survey (USGS) Digital Elevation Model (DEM) data and data from the NED, is also used to generate the terrain elevations for the receptor locations. The AERMAP program generates an output file that contains the receptor pathway data for AERMOD.
Source Release Characterizations	Air dispersion modeling of DPM emissions was conducted assuming the off-road equipment would operate in accordance with the modeling scenario estimated in CalEEMod (Appendix C). The construction equipment and on-site truck travel DPM emissions were modeled as a line of adjacent volume sources across the project site to represent project construction with a release height of 5 meters, plume height of 10 meters, and plume width of 10 meters (SCAQMD 2008).

Source: See Appendix C.
Notes: AERMOD = American Meteorological Society/Environmental Protection Agency Regulatory Model; SDAPCD = San Diego Air Pollution Control District; SCAQMD = South Coast Air Quality Management District; SJVAPCD = San Joaquin Valley Air Pollution Control District; EPA = U.S. Environmental Protection Agency.

Regarding receptors, the construction scenario used a 2-kilometer by 2-kilometer Cartesian receptor grid with less than 50-meter spacing to establish the impact area and evaluate locations of maximum health risk impact. Discrete receptors were placed over residential receptors in closest proximity to the site.

The health risk calculations were performed using the Hotspots Analysis and Reporting Program Version 2 (HARP2) Air Dispersion and Risk Tool (ADMRT, Version 22118). AERMOD was run with all sources emitting unit emissions (1 gram per second) to obtain the necessary input values for HARP2. The line of volume sources was partitioned evenly based on the 1 gram per second emission rate. The ground-level concentration plot files were then used to estimate the long-term cancer health risk to an individual, and the non-cancer chronic health indices. There is no reference exposure level for acute health impacts from DPM, and, thus, acute risk was not evaluated.

Operational Heath Risk Assessment

CARB's Air Quality and Land Use Handbook: A Community Health Perspective encourages consideration of the health impacts of distribution centers that accommodate more than 100 trucks per day on sensitive receptors sited within 1,000 feet from the source in the land use decision-making process (CARB 2005). For the operational health risk, the operation year 2030 was assumed consistent with completion of project construction. Emissions from the operation of the project include truck trips, truck idling emissions, potential Truck Refrigeration Units (TRU), diesel-fueled cargo handling equipment, and potential emergency backup generators at each of the industrial business park with commercial uses. For risk assessment purposes, PM_{10} in diesel exhaust is considered DPM,

originating mainly from trucks traveling on site and off site, TRUs, and truck idling located at the loading docks. Truck and cargo handling equipment emissions were based on CalEEMod. Emission factors representing the vehicle and equipment mix and emissions for 2030 were used to estimate emissions associated with operation of the project. Truck idling would be limited to 5 minutes in accordance with CARB's adopted Airborne Toxic Control Measure; however, truck idling was conservatively assumed to idle for 15 minutes.[3] Therefore, the analysis conservatively overestimates DPM emissions from idling. All deliveries would occur Monday through Sunday.

Conservatively, 2030 CalEEMod and a constant 2030 emission factor data set was used for the entire duration of the analysis (i.e., 30 years). Use of the 2030 emission factors would overstate potential impacts since this approach does not include reductions in emissions due to fleet turnover or cleaner technology with lower emissions. The truck travel DPM emissions were calculated by applying the exhaust PM_{10} emission factor from CalEEMod and the total truck trip number over the length of the distance traveled. In addition, the on-site truck idling exhaust emissions were calculated by applying the idle exhaust PM_{10} emission factor from EMFAC2021 and total truck trip over the total idling time (i.e., 15 minutes).

The dispersion modeling was performed using AERMOD (Version 22112). The truck traffic was modeled as a line of adjacent volume sources including the following truck routes: north bound to and from I-5 Bay Boulevard; south bound to and from I-5 via Bay Boulevard; and east bound to and from I-5 and I-805 via H Street and Dispersion modeling receptors were places at proximate sensitive receptors along the truck routes. Emission sources were modeled as line volume sources with the exception of the emergency generators, which were modeled as point sources.

As previously described, health effects from carcinogenic air toxics are usually described in terms of cancer risk. The SCAQMD recommends a carcinogenic (cancer) risk threshold of 10 in one million. Some TACs increase noncancer health risk due to long-term (chronic) exposures. A hazard index less than one (1.0) means that adverse health effects are not expected. Within this analysis, noncarcinogenic exposures of less than 1.0 are considered less than significant**.** The exhaust from diesel engines is a complex mixture of gases, vapors, and particles, many of which are known human carcinogens. DPM has established cancer risk factors and relative exposure values for long-term chronic health hazard impacts. No short-term, acute relative exposure values are established and regulated and are therefore not addressed in this assessment.

Dudek evaluated the project's potential cancer and noncancer health impacts using exposure periods appropriate to evaluate long-term emission increases (third trimester of pregnancy to 30 years). Emissions dispersion of DPM was modeled using AERMOD, then cancer risk and noncancer health impacts subsequently using the CARB HARP2 (ADMRT, Version 22118). The health risk results were then compared to SCAQMD thresholds to assess project significance. Principal parameters of this modeling are presented in Table 5.2-12.

Table 5.2-12. Operational Health Risk Assessment American Meteorological Society/U.S. Environmental Protection Agency Regulatory Model Operational Principal Parameters

Parameter	Details
Meteorological Data	The SDAPCD was consulted to obtain the most representative meteorological data set for the project site. The SDAPCD provided meteorological data for the Chula Vista meteorological station, which was located at 84 East J Street in Chula Vista, approximately

[3] Although the project is required to comply with CARB's idling limit of 5 minutes, on-site idling emissions was estimated for 15 minutes of truck idling, which would consider on-site idling while the trucks are waiting to pull up to the loading dock, idling at the loading dock, and idling during check-in and check-out.

Table 5.2-12. Operational Health Risk Assessment American Meteorological Society/U.S. Environmental Protection Agency Regulatory Model Operational Principal Parameters

Parameter	Details
	2.5 miles east of the project site. The latest three-year data set from the Chula Vista station was for the 2010-2012 years.
Urban versus Rural Option	Rural dispersion option was selected due to the close proximity to the coastline. The rural dispersion option is the modeling default for San Diego County (SDAPCD 2022c).
Terrain Characteristics	Digital elevation model files were imported into AERMOD so that complex terrain features were evaluated as appropriate for the site. This accounts for complex terrain within 2 kilometers of the site. The National Elevation Dataset (NED) dataset with resolution of 1 arc-second was used. The AERMAP terrain preprocessor, which can process U.S. Geological Survey (USGS) Digital Elevation Model (DEM) data and data from the NED, is also used to generate the terrain elevations for the receptor locations. The AERMAP program generates an output file that contains the receptor pathway data for AERMOD.
Emission Sources and Release Parameters	Air dispersion modeling of off-site and on-site truck travel, TRUs, and truck idling were conducted using emissions generated using EMFAC2021 and CalEEMod. Forklift and yard truck emissions were estimated using CalEEMod. Stationary source equipment estimates were based on CalEEMod using the statewide average emissions based on calendar year 2030.
Source Release Characterizations	With the exception of the emergency generators, which were modeled as point sources, the remaining sources were all modeled as line volume sources. Release parameters were based on guidance from SCAQMD, EPA, SDAPCD, and the San Joaquin Valley Air Pollution Control District. (EPA 2022b; SCAQMD 2008; SJVAPCD 2022, SDAPCD 2022c).

Source: See Appendix C.
Note: AERMOD = American Meteorological Society/Environmental Protection Agency Regulatory Model; SDAPCD = San Diego Air Pollution Control District; SCAQMD = South Coast Air Quality Management District; SJVAPCD = San Joaquin Valley Air Pollution Control District; EPA = U.S. Environmental Protection Agency.

Regarding receptors, a Cartesian receptor grid with less than 50-meter spacing was utilized to establish the impact area and evaluate locations of maximum health risk impact. Dispersion modeling receptors were places at proximate sensitive receptors along the truck routes.

Cancer risk is defined as the increase in probability (chance) of an individual developing cancer due to exposure to a carcinogenic compound, typically expressed as the increased chances in one million. Maximum Individual Cancer Risk is the estimated probability of a maximally exposed individual potentially contracting cancer as a result of exposure to TACs over a period of 30 years for residential receptor locations. The HRA assumes exposure would start in the third trimester of pregnancy through 30 years for all residential sensitive receptor locations. The exposure pathway for DPM is inhalation only.

5.2.3 Impacts

Is should be noted that case law (North County Advocates v. City of Carlsbad (2015) 241 Cal.App.4th 94, 105-106) allows a credit for existing uses and structures, even when not currently in operation; however, to be conservative the following analysis does not take existing uses into consideration.

Would the project conflict with or obstruct implementation of the applicable air quality plan?

SDAPCD and SANDAG are responsible for developing and implementing the clean air plans for attainment and maintenance of the NAAQS and CAAQS in the SDAB; specifically, the SIP and RAQS.[4] The federal O_3 maintenance plan, which is part of the SIP, was last updated in 2020. The SIP includes a demonstration that current strategies and tactics will maintain acceptable air quality in the SDAB based on the NAAQS. The RAQS was initially adopted in 1991 and is updated every 3 years (most recently in 2022). The RAQS outlines SDAPCD's plans and control measures designed to attain the CAAQS for O_3. The SIP and RAQS rely on information from CARB and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in San Diego County and the cities in the County, to project future emissions and then determine from that the strategies necessary for the reduction of emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by San Diego County and the cities in the County as part of the development of their general plans. The 2022 RAQS continues to build upon previous progress to reduce ground-level ozone, but also complements regional actions addressing greenhouse gases and climate change.

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

The approximately 44.8-acre project site was used for agriculture until 1941, when it was developed as the Rohr Aircraft Facility, which employed thousands of Chula Vista residents for more than 60 years. The site is currently developed with two main industrial buildings and several smaller outbuildings. One of the buildings on site is approximately 282,004 square feet and was used for research and development, tooling, and warehousing and distribution of aftermarket products until early 2021. The other two larger buildings on site have a combined square footage of 733,977. There are also 11 smaller outbuildings totaling 32,860 square feet. These buildings were used for manufacturing, warehouse, and distribution operations until approximately 2020.

Population

SANDAG estimates future population, housing, land use, and economic growth throughout San Diego County and in individual cities, including the City of Chula Vista. On May 25, 2018, the Series 14 2050 Regional Growth Forecast was accepted by the SANDAG Board of Directors for planning purposes (SANDAG 2018). This forecast serves as the foundation for San Diego Forward: The Regional Plan and other planning documents across the region. SANDAG projects the region's population will grow by 437,000 people between 2016 and 2050. This forecast is consistent with previous expectations although future growth rates have been reduced due to increased domestic migration out of the region. The growth in population will drive job growth and housing demand within the region, adding nearly 440,000 jobs and more than 280,000 housing units by 2050 (SANDAG 2021b).

The City of Chula Vista is anticipated to have a population of 284,835 by 2025, which comprises approximately 8.2% of the population in the San Diego region. As shown in Table 5.2-13, the SANDAG Series 14 Regional Growth Forecast for 2050 predicts population, housing, and employment for the San Diego Region, as well as for the City of Chula Vista, for 2016 through 2050.

[4] For this discussion, the relevant federal air quality plan is the O_3 maintenance plan (SDAPCD 2016b). The RAQS is the applicable plan for purposes of state air quality planning. Both plans reflect growth projections in the SDAB.

Table 5.2-13. San Diego Region vs. City of Chula Vista Population, Housing, and Employment Forecast

Planning Area	Year 2016	Year 2025	Year 2035	Year 2050	Increase	Percent Change
Population						
City of Chula Vista	265,357	284,835	288,141	323,469	58,112	21.9%
San Diego Region[a]	3,309,510	3,470,848	3,620,348	3,746,073	436,563	13.2%
Housing						
City of Chula Vista	82,794	91,635	95,621	109,474	26,680	32.2%
San Diego Region	1,190,555	1,288,216	1,409,866	1,471,299	280,744	23.6%
Employment						
City of Chula Vista	74,078	83,027	98,701	116,185	42,107	56.8%
San Diego Region	1,646,419	1,761,747	1,921,475	2,086,318	439,899	26.7%

Sources: SANDAG 2021b.
Note:
[a] The San Diego Region includes both incorporated and unincorporated areas of the region.

Housing

According to SANDAG's 2050 Regional Growth Forecast, the City is expected to gain 58,112 new residents and 26,680 new households between 2016 and 2050 (SANDAG 2021b). Furthermore, SANDAG, through its Regional Housing Needs Allocation, estimated that the City would experience a demand for 11,105 housing units through the 2021 and 2029 planning period, of which 4,527 new housing units would be for affordable to low- and very-low-income households and 6,578 new housing units would be for moderate- and above-moderate-income households. The City of Chula Vista anticipates that much of the new construction will result from building out the master-planned communities in the East Planning Area, such as Otay Ranch, infill development, and mixed-use development (SANDAG 2021c).

To encourage the development of adequate housing to meet the needs of low and moderate-income households and to further geographic and community balance, the City's adopted Housing Element provides for a Balanced Communities Policy, requiring 10% affordable housing for low- and moderate-income households within developments of 50 or more residential units.[5,6] This inclusionary housing program will serve as only one component of the City's overall housing strategy and will complement other affordable housing efforts, including preservation of existing assisted housing, development of new assisted housing with public subsidies, first-time

[5] Low-income households are households of persons who claim primary residency at the same unit with combined incomes that are greater than 50%, but not more than 80% of the Area Median Income for the San Diego area based on household size as determined annually by the U.S. Department of Housing and Urban Development. Household size is calculated by the number of persons residing at the same unit as their primary residence.

[6] Moderate-income households are households of persons who claim primary residency at the same unit with combined incomes between 80% to 120% of the Area Median Income for the San Diego area based on household size as determined annually by the U.S. Department of Housing and Urban Development. Household size is calculated by the number of persons residing at the same unit as their primary residence.

homebuyer assistance, and rehabilitation loans for low-income homeowners. The City has found that such an inclusionary housing policy is beneficial to increasing the supply of housing affordable to households of lower and moderate incomes and to meet the City's regional share of housing needs given the demographics of the community and its needs, past housing production performance, and the existing opportunities and constraints as detailed in its Housing Element (City of Chula Vista 2012a).

The City's new General Plan Housing Element was adopted on July 13, 2021, and amended on September 13, 2022. The Housing Element establishes clear goals and objectives to inform future housing decisions for the 2021 to 2029 housing cycle. As part of the Housing Element update, the City must demonstrate there is sufficient capacity to accommodate the number of housing units identified in the Regional Housing Needs Assessment (RHNA). As such, the RHNA allocation was released by SANDAG in November 2019 and helped inform preparation of the 2021 Housing Element. Tables 5.2-14 and 5.2-15 show the past performance RHNA from the 5th Cycle (2013–2020) and the current RHNA allocation for the 6th Cycle (2021–2029), respectively (City of Chula Vista 2020b).

Table 5.2-14. Past Performance RHNA 5th Cycle (2013-2020)

Income Level	RHNA Allocation by Level	Total Units to Date (all years)	Total Remaining RHNA (2019–2021)
Very Low	3,209	91	3,118
Low	2,439	557	1,882
Moderate	2,257	328	1,929
Above Moderate	4,956	7,614	2,658
Total	**12,861**	**8,590**	**4,271**

Source: City of Chula Vista 2020.
Note: RHNA = Regional Housing Needs Assessment.

Table 5.2-15. RHNA Allocation for the 6th Cycle (2021-2029)

Income Category	RHNA Allocation by Level	Percentage of Total Units
Very Low	2,750	25%
Low	1,777	16%
Moderate	1,911	17%
Above Moderate	4,667	42%
Total	**11,105**	**100%**

Source: City of Chula Vista 2020.
Note: RHNA = Regional Housing Needs Assessment.

The General Plan incorporates a Housing Element (adopted July 13, 2021) that identifies strategies to expand housing opportunities for the City's various economic segments. Under the Housing Element, the provision of new housing opportunities within mixed use areas and at higher density levels, particularly transit focus areas, is encouraged. A primary issue of the Housing Element is the shortfall of housing, particularly affordable housing, in the City and the region. The 2021 Housing Element of the General Plan provides implementation mechanisms for effectively addressing Chula Vista's housing needs throughout the 2021–2029 planning period. Existing programs and policies of the 2013–2020 Housing Element are evaluated in the 2021 Housing Element to identify revisions and the current needs of Chula Vista's population (City of Chula Vista 2021c).

Goals and policies listed in the General Plan encourage the provision of a wide range of housing choices by location, type of unit, and price level, in particular the establishment of permanent affordable housing for low and moderate-

income households. General Plan goals and policies ensure the availability of housing opportunities to persons regardless of race, color, ancestry, national origin, religion, sex, disability, marital status, familial status, source of income, or sexual orientation and support efforts to increase homeownership rates to build individual wealth (City of Chula Vista 2021c).

Employment

Employment and job growth have an influence on housing needs in the region and in the City. SANDAG's forecast of job growth for the City and the San Diego region from 2016 to 2050 estimates that the City's job growth is projected to be faster than growth projected in the San Diego region. Job growth in the City is expected to increase by 56.8%, while job growth in the San Diego region is projected to be 26.7% between 2016 and 2050.

As shown in Table 5.2-16 according to the U.S. Census Bureau, the City's labor force 16 years and older in 2021 was 128,931 people, with the leading industries being education, health care, and social services; retail trade; and professional, scientific, management, and administration services.

Table 5.2-16. Employment by Industry in City of Chula Vista

Labor Force Status	Persons
Employed Population 16 Years and Over	128,931
Agriculture	470
Construction	8,761
Manufacturing	10,526
Wholesale Trade	3,459
Retail Trade	14,338
Transportation and Warehousing	8,246
Information	1,354
Finance, Real Estate	6,965
Professional, Scientific, Management, and Administration	14,288
Educational, Health Care, and Social Services	32,149
Arts, Accommodations, and Food Services	10,6301
Public Administration	11,462
Other Services	6,301

Source: U.S. Census Bureau 2021.

Planning Areas A, B-1, and B-2 of the project site are located within the Chula Vista Bayfront Local Coastal Program and currently lie within the General Industrial (I) Zoning and Industrial (I) General Plan land use designations. The proposed project would amend the General Plan to change the land use designation on the project site from Industrial (I) to Rohr Wohl Specific Plan. The zoning of the area would be amended to allow for a flexible combination of light industrial, office, commercial and visitor-oriented uses.

As described above, the SANDAG Series 14 estimates population in Chula Vista would grow from 284,835 in 2025 to 288,141 in 2035; and employment would increase from 83,027 jobs in 2025 to 98,701 jobs in 2035 (SANDAG 2018). Based on the anticipated increase in jobs of 15,674 in the City, the proposed project would account for 6.4% of that increase. Construction jobs associated with the proposed project would be temporary and would not require permanent relocation into the City. Once operational, the estimated 1,000 jobs that would result from the proposed project would result in some amount of population growth within the City due to new employment

opportunities, however, this population growth would not be considered to be greater than what is planned by the General Plan and SANDAG growth estimates because the proposed project would restore what was previously a major job center for the City of Chula Vista.

The proposed project would rejuvenate an underutilized property creating employment opportunities and restoring the approximate 1,000 jobs that existed on site. Furthermore, the City of Chula Vista's General Plan outlines the measures necessary to direct and coordinate growth and development in ways to improve the quality of life for current and future residents of Chula Vista. The proposed project fosters a development pattern that promotes orderly growth by developing on a site with existing industrial uses. Based on the preceding, it is not anticipated that the project would contribute to substantial population and employment growth and associated VMT that was not anticipated for the project site in the existing General Plan and SANDAG Growth Estimates. However, because the project would be seeking a General Plan Amendment it is possible that the future job growth on the project site may be more intensive than what previously existed and therefore not within job growth projections from SANDAG. The anticipated growth in employment and population and consequently VMT would therefore not be within regional growth forecasts. Implementation of the proposed project could conflict with or obstruct the implementation of the RAQS and/or applicable portions of the SIP, and the impact would be **potentially significant** without mitigation. Implementation of Mitigation Measure AQ-1 (MM-AQ-1) would ensure that the appropriate growth and land use projections at the project site would be incorporated into the next SANDAG RTP/SCS and the following SDAPCD Clean Air Plan, which would resolve this inconsistency in the future.

Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Construction

Construction of the proposed project would result in the temporary addition of pollutants to the local airshed caused by on-site sources (i.e., off-road construction equipment, soil disturbance, and VOC off-gassing) and off-site sources (vendor and haul truck trips, and worker vehicle trips). Construction emissions can vary substantially day to day, depending on the level of activity, the specific type of operation, and for dust, the prevailing weather conditions.

Criteria air pollutant emissions associated with construction activities were quantified using CalEEMod. Default values provided by the program were used where detailed project information was not available. A detailed depiction of the construction schedule—including information regarding phasing, equipment used during each phase, haul trucks, vendor trucks, and worker vehicles—is included above.

Development of the project would generate air pollutant emissions from entrained dust, off-road equipment, vehicle emissions, asphalt pavement application, and architectural coatings. As described previously, fugitive dust would be limited through compliance with SDAPCD Rule 55, which requires the restriction of visible emissions of fugitive dust beyond the property line. This measure is incorporated into the project as PDF-AQ-1, and is detailed in Chapter 4, Project Description.

Table 5.2-17 shows the estimated maximum unmitigated daily construction emissions associated with the construction phases of the Project. Complete details of the emissions calculations are provided in Appendix C.

Table 5.2-17. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions - Unmitigated

Year	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds Per Day					
Summer						
2024	3.82	48.33	36.16	0.13	21.80	4.12
2025	2.00	13.65	23.42	0.04	2.63	0.63
2026	85.21	12.87	22.69	0.04	2.58	0.63
2028	2.11	14.06	26.31	0.05	8.20	1.47
2029	87.42	13.32	25.58	0.05	3.76	0.94
Winter						
2024	3.81	48.80	36.10	0.13	14.10	2.53
2025	1.99	13.81	22.31	0.04	2.63	0.63
2026	85.21	13.04	21.70	0.04	2.58	0.63
2028	2.09	14.23	24.96	0.05	3.78	0.97
2029	2.02	13.59	24.24	0.05	3.76	0.94
Maximum Daily Emissions	**87.42**	**48.80**	**36.16**	**0.13**	**21.80**	**4.12**
SCAQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**Yes**	**No**	**No**	**No**	**No**	**No**

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter;
See Appendix C for complete results.
The values shown are the maximum summer or winter daily emissions results from CalEEMod and include fugitive dust mitigation pursuant to PDF AQ-1.)

As shown in Table 5.2-13, daily construction emissions for the project would exceed the SCAQMD's significance thresholds for VOC, primarily from painting emissions. Therefore, the project would have a potentially significant impact related to emissions of criteria air pollutant emissions during construction and mitigation is required to reduce the impact. Mitigation Measure AQ-2 (MM AQ-2) would require the use of super compliant VOC paint, which is 10 mg of VOC per liter.

Operations

Operation of the proposed project would generate VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ emissions from mobile sources (vehicle trips), area sources (consumer products, landscape maintenance equipment), and energy sources. Criteria air pollutant emissions associated with long-term operations were quantified using CalEEMod. In addition, the emissions from existing uses on the project site were also estimated using CalEEMod.

Table 5.2-18 presents the unmitigated maximum daily emissions associated with the operation of the project in 2030 after all phases of construction have been completed. The existing emissions are also shown as well as the net project emissions. Complete details of the emissions calculations are provided in Appendix C. Emissions represent maximum of summer and winter. "Summer" emissions are representative of the conditions that may occur during the O_3 season (May 1 to October 31), and "winter" emissions are representative of the conditions that may occur during the balance of the year (November 1 to April 30).

Table 5.2-18. Estimated Maximum Daily Operational Criteria Air Pollutant Emissions

Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per Day					
Project	**Summer**					
Mobile	35.45	62.33	297.18	1.15	91.47	24.02
Area	28.72	0.35	41.67	0.00	0.07	0.06
Energy	0.54	9.85	8.28	0.06	0.75	0.75
Offroad (forklifts, yard trucks)	2.99	25.58	46.28	0.08	0.88	0.81
Stationary (Emergency Generators)	4.10	11.47	10.46	0.02	0.60	0.06
Subtotal	*71.81*	*109.57*	*403.87*	*1.30*	*93.78*	*25.69*
Existing	**Summer**					
Mobile	14.38	10.66	100.95	0.22	17.66	4.61
Area	29.89	0.37	43.37	0.00	0.08	0.06
Energy	0.51	9.22	7.75	0.06	0.70	0.70
Offroad (forklifts, yard trucks)	4.90	45.62	49.12	0.08	2.6	2.39
Stationary (Emergency Generators)	0	0	0	0	0	0
Subtotal	*49.67*	*65.88*	*201.20*	*0.35*	*21.04*	*7.75*
Net	**Summer**					
Mobile	21.07	51.67	196.23	0.93	73.81	19.41
Area	-1.17	-0.02	-1.70	0.00	-0.01	0.00
Energy	0.03	0.63	0.53	0.00	0.05	0.05
Offroad (forklifts, yard trucks)	-1.91	-20.04	-2.84	0.00	-1.72	-1.58
Stationary (Emergency Generators)	4.10	11.47	10.46	0.02	0.60	0.06
Total	**22.13**	**43.70**	**202.67**	**0.96**	**72.73**	**17.95**
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Project	**Winter**					
Mobile	35.02	66.38	278.55	1.11	91.47	24.02
Area	21.87	0.00	0.00	0.00	0.00	0.00
Energy	0.54	9.85	8.28	0.06	0.75	0.75
Offroad (forklifts, yard trucks)	2.99	25.58	46.28	0.08	0.88	0.81
Stationary (Emergency Generators)	4.10	11.47	10.46	0.02	0.60	0.06
Subtotal	*64.53*	*113.28*	*343.57*	*1.26*	*93.70*	*25.64*
Existing	**Winter**					
Mobile	13.97	11.71	95.96	0.21	17.66	4.61
Area	22.77	0.00	0.00	0.00	0.00	0.00

Table 5.2-18. Estimated Maximum Daily Operational Criteria Air Pollutant Emissions

Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per Day					
Energy	0.51	9.22	7.75	0.06	0.70	0.70
Offroad (forklifts, yard trucks)	4.90	45.62	49.12	0.08	2.60	2.39
Stationary (Emergency Generators)	0.00	0.00	0.00	0.00	0.00	0.00
Subtotal	*42.15*	*66.56*	*152.83*	*0.34*	*20.96*	*7.70*
Net	**Winter**					
Mobile	21.05	54.67	182.59	0.90	73.81	19.41
Area	-0.90	0.00	0.00	0.00	0.00	0.00
Energy	0.03	0.63	0.53	0.00	0.05	0.05
Offroad (forklifts, yard trucks)	-1.91	-20.04	-2.84	0.00	-1.72	-1.58
Stationary (Emergency Generators)	4.10	11.47	10.46	0.02	0.60	0.06
Total	**22.37**	**46.72**	**190.74**	**0.93**	**72.74**	**17.94**
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: VOC = volatile organic compound; NOx = oxides of nitrogen; CO = carbon monoxide; SOx = sulfur oxides; PM10 = coarse particulate matter; PM2.5 = fine particulate matter;
See unmitigated results in Rohr-Wohl Specific Plan – Mitigated PM/VOC Detailed Report.pdf in Appendix A for complete results. The values shown are the maximum summer or winter daily emissions results from CalEEMod.

As shown in Table 5.2-15, the net daily operational emissions for the project would not exceed the SCAQMD's thresholds for any criteria air pollutant. Therefore, the project would result in a **less than significant** impact related to emissions of criteria air pollutant emissions during operation.

Would the project expose sensitive receptors to substantial pollutant concentrations?

Carbon Monoxide Hotspots

A CO hot spot is a localized concentration of CO that is above the state or national 1-hour or 8-hour ambient air standards for the pollutant. Projects that do not generate CO concentrations in excess of the health-based CAAQS would not contribute a significant level of CO such that localized air quality and human health would be substantially degraded.

Ambient CO levels are monitored at the Lexington Elementary School air monitoring station in El Cajon, approximately 14 miles northeast of the project site and represents ambient CO in the project area. Ambient CO levels monitored at this representative monitoring station indicate that the highest recorded 1-hour concentration of CO is 2.2 ppm (the State standard is 20 ppm) and highest 8-hour concentration is 1.2 ppm (the State standard is 9 ppm) during the past 3 years of available data (EPA 2022a). As discussed above, the highest CO concentrations typically occur during peak traffic hours, so CO impacts calculated under peak traffic conditions represent a worst-case analysis.

The City does not have guidance regarding CO hotspots and has in the past referenced the County of San Diego's CO hotspot screening guidance (County of San Diego 2007). Per guidance, any project that would place receptors within 500 feet of a signalized intersection operating at or below LOS E (peak-hour trips exceeding 3,000 trips) must conduct a "hotspot" analysis for CO. Likewise, projects that will cause road intersections to operate at or below a level of service (LOS) E (i.e., with intersection peak-hour trips exceeding 3,000) will also have to conduct a CO "hotspot" analysis.

Since the last update of the County's guidance (2007), the County has evaluated the potential for the growth anticipated under its General Plan Update to result in CO "hot spots" throughout the County (County of San Diego 2009). To do this, the County reviewed the CO "hot spot" analysis conducted by the South Coast Air Quality Management District (SCAQMD) for their request to the USEPA for redesignation as a CO attainment area (SCAQMD 2003). In SCAQMD's analysis, they modeled the four most congested intersections identified in their basin (South Coast Air Basin [SCAB]), which included the following:

- Long Beach Boulevard and Imperial Highway – proximity to the Lynwood monitoring station, which consistently records the highest 8-hour CO concentrations in the SCAB each year.
- Wilshire Boulevard and Veteran Avenue – the most congested intersection in Los Angeles County, with an average daily traffic volume of 100,000 vehicles/day.
- Highland Avenue and Sunset Boulevard – one of the most congested intersections in the City of Los Angeles.
- Century Boulevard and La Cienega Boulevard – one of the most congested intersections in the City of Los Angeles.

The SCAQMD's analysis found that these intersections had an average 7.7 ppm 1-hour CO concentrations predicted by the models, which is only 38.5% of the 1-hour CO CAAQS of 20 ppm. Therefore, even the most congested intersections in SCAQMD's air basin would not experience a CO "hot spot".

The air quality monitoring station closest to the most congested intersection in Los Angeles County (Wilshire Boulevard/Veteran Avenue) is the VA Hospital, West Los Angeles Station (Site ID 060370113) located at Wilshire Boulevard and Sawtelle Boulevard, approximately 0.5 miles to the southwest. Ambient CO levels monitored at this representative monitoring station are outlined in Table 5.2-19 for the original analysis year (2002), and for the most recent year of available data (2023). As shown, there is noticeable improvement in background levels of CO since the SCAQMD's regional hotspot analysis.

Table 5.2-19. Ambient Carbon Monoxide Concentrations for SCAQMD's Most Congested Intersection

Year	CO Concentration (ppm)	
	Maximum 1-hour	Maximum 8-hour
2002	4.3	2.7
2023	1.2	1.1

Source: EPA 2022a

The City of Chula Vista General Plan EIR evaluated the most impacted intersections as a result of General Plan buildout and predicted a maximum 1-hour concentration of 6.7 ppm (the California standard is 20 ppm and the

Federal standard is 35 ppm) and a maximum 8-hour concentration of 5.4 ppm (the California and Federal standards are 9 ppm).

The Local Mobility Analysis prepared for the project by Mizuta Traffic Consulting evaluated Level of Service performance for the project and in all scenarios, traffic volumes were well below the 100,000 vehicles per day.

In addition, the CO "hot spot" analysis performed by the SCAQMD included emissions for 1997 and 2002. Both running exhaust emission factors and idling emission factors predicted by the EMFAC model decreased from 1997 through 2002 as outlined in Table 5.2-20 below. This decrease in CO emission factors is indicative of a phase-out of older vehicles and increasingly strict emissions standards implemented by CARB. Emission factors for San Diego County from the EMFAC2007 Model, which were used in the General Plan Update analysis, indicated that running exhaust emissions of CO would be less than 6.708 g CO per mile in 2010. Continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion means that the potential for CO hotspots in the SDAB is likely to decrease.

Table 5.2-20. Carbon Monoxide Emission Factors Predicted by the EMFAC Model

Year	CO Emission Factors (grams CO/mile)	
	Running Exhaust	Idling Exhaust
1997	13.13	2.43
2002	7.98	1.30

Source: South Coast Air Quality Management District 2003

The County of San Diego concluded in its General Plan Update (2011) that because the most congested intersections in San Diego are less congested than those from the SCAB, and because emissions of CO would be lower than those used in the SCAQMD analysis, CO concentrations would be lower within San Diego County, and no CO "hot spots" are anticipated as was concluded in the SCAQMD analysis.

Given that proposed development will not result in traffic that exceeds traffic volumes considered in the County's General Plan Update analysis, coupled with the considerably low level of CO concentrations in the project area (, and continued improvements in vehicle emissions, the project is not anticipated to result in CO "hot spots". Consequently, implementation of the project would not result in CO concentrations in excess of the health protective CAAQS or NAAQS, and as such, would not expose sensitive receptors to significant pollutant concentrations or health effects. Therefore, impacts related to sensitive receptor exposure to substantial CO concentrations would be **less than significant**, and no mitigation measures are required.

Toxic Air Contaminants

Cancer risk is defined as the increase in probability (chance) of an individual developing cancer due to exposure to a carcinogenic compound, typically expressed as the increased chances in one million. Maximum Individual Cancer Risk is the estimated probability of a maximally exposed individual potentially contracting cancer as a result of exposure to TACs over a period of 30 years for residential receptor locations. As previously described, health effects from carcinogenic air toxics are usually described in terms of cancer risk. The SCAQMD recommends a carcinogenic (cancer) risk threshold of 10 in one million. Some TACs increase noncancer health risk due to long-term (chronic) exposures. A hazard index less than one (1.0) means that adverse health effects are not expected. Within this analysis, noncarcinogenic exposures of less than 1.0 are considered less than significant.

As discussed in 2.3.3.3, a construction HRA was performed to estimate the Maximum Individual Cancer Risk and the Chronic Hazard Index for existing sensitive receptors (existing residences) as a result of project construction. Results of the construction HRA are presented in Table 5.2-21.

Table 5.2-21. Construction Health Risk Assessment Results – Unmitigated

Impact Parameter	Units	Project Impact	CEQA Threshold	Level of Significance
Maximum Individual Cancer Risk – Residential	Per Million	21.78	10	**Potentially Significant**
Chronic Hazard Index – Residential	Index Value	0.011	1.0	Less than Significant.

Source: Appendix C.
Note: CEQA = California Environmental Quality Act.

As shown in Table 5.2-21, the DPM emissions from construction of the project would result in a Maximum Individual Cancer Risk of 21.78 in 1 million and a Chronic Hazard Index of 0.011. The Chronic Hazard Index would be below the 1.0 significance threshold; however, the project would exceed the cancer risk threshold of 10 in a million and would be **potentially significant** without mitigation (MM-AQ-3 and MM-AQ-4).

Operational Health Risk

As discussed in 2.3.3.3, an operational HRA was performed to estimate the Maximum Individual Cancer Risk and the Chronic Hazard Index for existing sensitive receptors (existing residences) as a result of project operations. Results of the operational HRA are presented in Table 5.2-22.

Table 5.2-22. Operational Health Risk Assessment Results – Unmitigated

Impact Parameter	Units	Project Impact	CEQA Threshold	Level of Significance
Maximum Individual Cancer Risk – Residential	Per Million	205.74	10	**Potentially Significant**
Chronic Hazard Index – Residential	Index Value	0.055	1.0	Less than Significant.

Source: Appendix C.
Note: CEQA = California Environmental Quality Act.

As shown in Table 5.2-19, the DPM emissions from operation of the project would result in a Maximum Individual Cancer Risk of 205.74 in 1 million and a Chronic Hazard Index of 0.055. The Chronic Hazard Index would be below the 1.0 significance threshold; however, the project would exceed the cancer risk threshold of 10 in a million and would be **potentially significant** without mitigation (MM-AQ-5 through MM-AQ-8).

Health Effects of Criteria Air Pollutants

Construction and operation of the project would not result in emissions that exceed SDAPCD's emission thresholds for any criteria air pollutants. The SDAPCD thresholds are based on the SDAB complying with the NAAQS and CAAQS which are protective of public health; therefore, no adverse effects to human health would result from the project. The following provides a general discussion of criteria air pollutants and their health effects.

Regarding VOCs, some VOCs would be associated with motor vehicles and construction equipment, while others are associated with architectural coatings and asphalt off-gassing, the emissions of which would not result in

exceedances of County of San Diego thresholds. Generally, the VOCs in architectural coatings and asphalt are of relatively low toxicity. Additionally, SDAPCD Rule 67.0.1 restricts the VOC content of coatings for both construction and operational applications.

In addition, VOCs and NO_x are precursors to O_3, for which the SDAB is designated as nonattainment with respect to the NAAQS and CAAQS (the SDAB is designated by EPA as an attainment area for the 1-hour O_3 NAAQS standard and 1997 8-hour NAAQS standard). The health effects associated with O_3, as discussed in Section 5.2.1.2, under Criteria Air Pollutants, are generally associated with reduced lung function. The contribution of VOCs and NO_x to regional ambient O_3 concentrations is the result of complex photochemistry. The increases in O_3 concentrations in the SDAB due to O_3 precursor emissions tend to be found downwind from the source location to allow time for the photochemical reactions to occur. However, the potential for exacerbating excessive O_3 concentrations would also depend on the time of year that the VOC emissions would occur because exceedances of the O_3 NAAQS and CAAQS tend to occur between April and October when solar radiation is highest. The holistic effect of a single project's emissions of O_3 precursors is speculative due to the lack of quantitative methods to assess this impact. Nonetheless, the VOC and NO_x emissions associated with Project construction could minimally contribute to regional O_3 concentrations and the associated health impacts. Due to the minimal contribution during construction and operation, as well as the existing good air quality in coastal San Diego areas, health impacts would be considered less than significant.

Regarding NO_2, which is a constituent of NO_x, construction of the Project would not contribute to exceedances of the NAAQS and CAAQS for NO_2 since NO_x emissions would be less than the applicable SDAPCD threshold. NO_2 health impacts are associated with respiratory irritation, which may be experienced by nearby receptors during the periods of heaviest use of off-road construction equipment. However, these operations would be relatively short term, and the off-road construction equipment would be operating on various portions of the site and would not be concentrated in one portion of the site at any one time. Construction of the Project would not require any stationary emission sources that would create substantial, localized NO_2 impacts.

As discussed earlier, $PM_{2.5}$ and PM_{10} pose a greater health risk than larger-size particles. When inhaled, these tiny particles can penetrate the human respiratory system's natural defenses and damage the respiratory tract. $PM_{2.5}$ and PM_{10} can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Similar to O_3, construction of the Project would not exceed thresholds for PM_{10} or $PM_{2.5}$ and would not contribute to exceedances of the NAAQS and CAAQS for particulate matter. Due to the minimal contribution of particulate matter during construction and operation, health impacts would be considered less than significant.

Based on the preceding considerations, health impacts from project-related criteria air pollutant emissions would be considered **less than significant**.

Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Construction

Odors would be generated from vehicles and/or equipment exhaust emissions during construction of the project. Odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment and architectural coatings. Such odors are temporary and for the types of construction activities anticipated for Project components, would generally remain localized and occur at

magnitudes that would not affect substantial numbers of people. Therefore, impacts associated with odors during construction would be considered **less than significant**.

Operational

Due to the subjective nature of odor impacts, the number of variables that can influence the potential for an odor impact, and the variety of odor sources, there are no quantitative or formulaic methodologies to determine if potential odors would have a significant impact. Examples of land uses and industrial operations that are commonly associated with odor complaints include agricultural uses, wastewater treatment plants, food processing facilities, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding facilities. In addition to the odor source, the distance between the sensitive receptor(s) and the odor source, as well as the local meteorological conditions, are considerations in the potential for a project to frequently expose the public to objectionable odors. Although localized air quality impacts are focused on potential impacts to sensitive receptors, such as residences and schools, other land uses where people may congregate (e.g., workplaces) or uses with the intent to attract people (e.g., restaurants and visitor-serving accommodations) should also be considered in the evaluation of potential odor nuisance impacts. The project is a commercial development that would include a restaurant use. Restaurants are typically equipped with modern ventilation and odor control systems that effectively mitigate the release of cooking odors into the surrounding environment. Additionally, the future restaurant would be situated within a commercial zone where the presence of various food-related smells may be anticipated and deemed acceptable. The meteorology indicates that the wind blows towards Planning Area PA-A-2 and across I-5; accordingly, any odors that do escape would generally be transient and localized, and they would dissipate quickly without affecting a substantial number of people. Finally, regulatory compliance with the City's municipal code section 19.66.090 ensures that odor impacts are minimized, further reducing the likelihood of significant adverse effects on the surrounding community. Based on the preceding, the project is not expected to produce nuisance odors that would impact a substantial number of people; therefore, impacts related to odors caused by the project would be **less than significant**.

5.2.4 Level of Significance Prior to Mitigation

Conflict with Air Quality Plan

The project's employment growth of 1,000 jobs may be inconsistent with what was anticipated in SANDAG's job growth estimates and thus would conflict with the Clean Air Plan which is based on anticipated growth resulting in a **potentially significant** impact.

Construction Emissions

As determined above, daily construction emissions for the project would exceed the SCAQMD's significance thresholds for VOC, primarily from painting emissions. Therefore, the project would have a **potentially significant** impact related to emissions of criteria air pollutant emissions during construction.

Toxic Air Contaminants

Construction

The construction HRA determined that DPM emissions from construction of the project would result in a Maximum Individual Cancer Risk of 20 in 1 million and a Chronic Hazard Index of 0.011. The Chronic Hazard Index would be

below the 1.0 significance threshold; however, the project would exceed the cancer risk threshold of 10 in a million and would **potentially significant** without mitigation.

Operation

The operational HRA determined that DPM emissions from operation of the project would result in a Maximum Individual Cancer Risk of 205 in 1 million and a Chronic Hazard Index of 0.055. The Chronic Hazard Index would be below the 1.0 significance threshold; however, the project would exceed the cancer risk threshold of 10 in a million and would be **potentially significant** without mitigation.

5.2.5 Mitigation Measures

The following mitigation measures would be implemented in order to reduce the identified potentially significant impacts:

Clean Air Plan

MM-AQ-1 Update the Regional Growth Forecast. The applicant will inform the San Diego Association of Governments (SANDAG) of the project so that SANDAG's next Regional Transportation Plan/Sustainable Communities Strategy, 2025 Regional Plan, can appropriately reflect employment locations and forecasts in Chula Vista. The updated information provided to SANDAG is anticipated be used by the San Diego Air Pollution Control District (SDAPCD) to update their Regional Air Quality Strategy (RAQS) Plan. The applicant shall prepare and submit a letter notifying SDAPCD of this revised forecast for use in the future updates to the plan as required.

Construction Emissions

MM AQ-2: Low VOC Paints. The project shall use super-compliant VOC paint (defined as less than 10 g/L of VOC) during project construction for architectural coatings.

Toxic Air Contaminants

Construction

MM AQ-3 Provision of Electrical Infrastructure for Construction and Use of Electric Construction Equipment. After the grading phase of Project construction, the Project Applicant or successor in interest shall provide temporary electrical hook ups to the power grid, rather than diesel-fueled generators, for contractors' electric construction tools, such as saws, drills and compressors. The use of diesel-fueled generators for on-site construction activities shall be prohibited unless electrical infrastructure is not yet available on the Project site. Diesel-fueled generators may be used for off-site construction work. All off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers) used during Project construction must be electric-powered. The Project Applicant or successor in interest shall include these requirements in applicable bid documents, purchase orders, and contracts with successful contractors.

MM AQ-4 Tier 4 Final Construction Equipment. Prior to the commencement of any construction activities, the applicant or its designee shall provide evidence to the City of Chula Vista (City) that for off-road equipment with engines rated at 75 horsepower or greater, no construction equipment shall be

used that is less than Tier 4 Final. In the event of changed circumstances (e.g., changes in availability of specific types of construction equipment), the applicant may submit a request to the City to apply an equivalent method of achieving project-generated construction emissions that fall below the numeric cancer risk standards established by the South Coast Air Quality Management District (SCAQMD). Documentation using industry-standard emission estimation methodologies shall be furnished to the City Community Development Department demonstrating that estimated project-generated construction emissions would not exceed the applicable SCAQMD cancer risk threshold with the alternate construction method(s). If the documentation demonstrates project-generated construction emissions will remain below the applicable SCAQMD cancer risk threshold, then the City may approve the alternate construction method(s) at the Development Director's discretion. Required construction equipment fleet and methodologies approved by the City shall be included in the in the contract specifications for the applicant's contractor.

Operation

MM AQ-5 Cargo Handling Equipment. All cargo handling equipment (including yard trucks, hostlers, yard goats, pallet jacks, and forklifts) shall be zero-emission vehicles. Each building shall include the necessary charging stations or other necessary infrastructure for cargo handling equipment. The building manager or their designee shall be responsible for enforcing these requirements.

MM AQ-6 Tier 4 Emergency Generators. The project operations shall be conditioned to operate with Tier 4 Final certified emergency generators.

MM AQ-7 Truck Requirements and Restrictions. Prior to issuance of a building permit, the City shall confirm the following:

- The loading docks shall be designed to accommodate SmartWay trucks.
- Applicant shall provide project specifications, drawings, and calculations that demonstrate that main electrical supply lines and panels have been sized to support heavy truck charging facilities when these trucks become available.
    - The calculations shall be based on reasonable predictions from currently available truck manufacturer's data. Electrical system upgrades that exceed reasonable costs shall not be required.

Prior to issuance of a certificate of occupancy, the City shall confirm the following:

- Any tenant lease agreement shall require tenants that do not already operate 2010 and newer trucks to apply in good faith for funding to replace/retrofit their trucks, such as Carl Moyer, VIP, Prop 1B, SmartWay Finance, or other similar funds. If awarded, the tenant shall be required to accept and use the funding. Tenants shall be encouraged to consider the use of alternative fueled trucks, as well as new or retrofitted diesel trucks. Tenants shall also be encouraged to become SmartWay Partners, if eligible. This measure shall not apply to trucks that are not owned or operated by the facility operator or facility tenants since it would be legally infeasible to prohibit access to the site by any truck that is otherwise legal to operate on California roads and highways.

- Legible, durable, weather-proof signs shall be placed at truck access gates, loading docks, and truck parking areas that identify applicable California Air Resources Board (CARB) anti-idling regulations. At a minimum, each sign shall include instructions for truck drivers to shut off engines when not in use; instructions for drivers of diesel trucks to restrict idling to no more than 5 minutes once the vehicle is stopped, the transmission is set to "neutral" or "park," and the parking brake is engaged; and telephone numbers of the building facilities manager and CARB to report violations. Prior to the issuance of an occupancy permit, the City shall conduct a site inspection to ensure that the signs are in place.

MM AQ-8 Transportation Demand Management. The project shall include contractual language in tenant lease agreements requiring that any facility operator with more than 100 employees require the establishment of a transportation demand management program to reduce employee commute vehicle emissions. Measures to reduce employee commute emissions may include but are not limited to the following:

- Offering secure bicycle storage, and changing facilities;
- Providing free or discounted transit passes to encourage employees to use public transportation;
- Establishing carpool or vanpool groups to reduce the number of single-occupancy vehicles on the road;
- Establishing a car-sharing or bicycle-sharing program;
- Providing on-site amenities such as cafeterias, fitness centers, etc. to reduce the need for employees to travel during the day;
- Providing incentives to encourage employees to use alternative modes of transportation.

5.2.6 Level of Significance After Mitigation

Clean Air Plan

Implementation of **MM-AQ-1** would ensure that the appropriate employment growth projections at the project site would be incorporated into the next SANDAG RTP/SCS (anticipated to be in 2025) and would thereby be incorporated into the following SDAPCD RAQS. Based on the above considerations, the project's potential to conflict with or obstruct implementation of the applicable air quality plan would be **less than significant** with mitigation incorporated into the project.

Construction Emissions

Table 5.2-23 shows the mitigated emissions from construction with the incorporation of MM AQ-2. As shown, the mitigated construction emissions from the project would fall below the SCAQMD's thresholds of significance, resulting in a **less than significant** impact with mitigation incorporated.

Table 5.2-23. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions - Mitigated

Year	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds Per Day					
Summer						
2024	0.95	48.33	36.16	0.13	8.30	4.12
2025	1.21	13.65	23.42	0.04	2.28	0.63
2026	21.23	12.87	22.69	0.04	2.27	0.63
2028	1.45	14.06	26.31	0.05	3.55	1.47
2029	21.70	13.32	25.58	0.05	3.55	0.94
Winter						
2024	1.23	48.80	36.10	0.13	7.08	2.53
2025	1.19	13.81	22.31	0.04	2.28	0.63
2026	21.23	13.04	21.70	0.04	2.27	0.63
2028	1.43	14.23	24.96	0.05	3.55	0.97
2029	1.39	13.59	24.24	0.05	3.55	0.94
Maximum Daily Emissions	**21.70**	**48.80**	**36.16**	**0.13**	**8.30**	**4.12**
SCAQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter;
See Appendix C for complete results.
The values shown are the maximum summer or winter daily emissions results from CalEEMod and include fugitive dust mitigation pursuant to PDF AQ-1.)

With the incorporation of MM-AQ-2, the project construction emissions of VOC are reduced to a less than significant level. As shown in Table 5.2-20 the mitigated emissions of all criteria pollutants from the project's construction would be below the significance levels. Construction would be short term, temporary in nature, and activities would be considered typical of a non-residential project. Once construction is completed, construction-related emissions would cease. Regarding long-term cumulative operational emissions in relation to consistency with local air quality plans, the SIP and RAQS serve as the primary air quality planning documents for the state and SDAB, respectively. The SIP and RAQS rely on SANDAG growth projections based on population, vehicle trends, and land use plans developed by the cities and by the County as part of the development of their general plans. Therefore, projects that propose development that is consistent with the growth anticipated by local plans would be consistent with the SIP and RAQS and would not be considered to result in cumulatively considerable impacts from operational emissions. As discussed under the first threshold, the Project may not be consistent with the SANDAG growth projections. As such, it would not be consistent at a regional level with the underlying growth forecasts in the SIP and RAQS. MM AQ-1 would update the regional growth forecasts which would be incorporated into the next SANDAG RTP/SCS and the SDAPCD RAQS ensuring the project's consistency.

As a result, the project would not result in a cumulatively considerable contribution to regional O_3 concentrations or other criteria pollutant emissions. Cumulative impacts for construction and operation would be **less than significant** with mitigation measures incorporated for the project.

Toxic Air Contaminants

Construction

In order to address potential exposure during construction MM-AQ-2 would require the use of electric infrastructure and specific electric equipment during construction and MM-AQ-3 would require that all diesel-fueled off-road construction equipment greater than 75 horsepower be zero-emissions or equipped with CARB Tier 4 Final compliant engines (as set forth in Section 2423 of Title 13 of the California Code of Regulations, and Part 89 of Title 40 of the Code of Federal Regulations). Table 5.2-24 summarizes the results of the HRA for project construction after mitigation.

Table 5.2-24. Construction Health Risk Assessment Results - Mitigated

Impact Parameter	Units	Impact Level	CEQA Threshold	Level of Significance
Maximum Individual Cancer Risk – Residential	Per Million	5.60	10	Less than Significant.
Chronic Hazard Index – Residential	Index Value	0.0029	1.0	Less than Significant.

Source: Appendix C
Notes: CEQA = California Environmental Quality Act

As shown in Table 5.2-24, mitigated project construction activities would result in a Maximum Individual Cancer Risk of 5.60 in 1 million at the maximally exposed residence, which is less than the significance threshold of 10 in 1 million. Mitigated project construction would result in a Chronic Hazard Index of 0.0029, which is below the 1.0 significance threshold. The project construction health risk impacts would be **less than significant** after mitigation.

Operation

Mitigation measures are required to minimize operational-related air quality impacts. MM-AQ-5 would require all off-road cargo handling equipment to be zero-emission. MM-AQ-6 would require any emergency generator used on the site to be Tier 4 Final. MM-AQ-7 would reduce emissions from diesel-fueled trucks. Table 5.2-225 summarizes the mitigated operational health risk levels associated with the project.

Table 5.2-25. Operational Health Risk Assessment Results - Mitigated

Impact Parameter	Units	Impact Level	CEQA Threshold	Level of Significance
Maximum Individual Cancer Risk – Residential	Per Million	7.65	10	Less than Significant.
Chronic Hazard Index – Residential	Index Value	0.002	1.0	Less than Significant.

Source: Appendix C.
Notes: CEQA = California Environmental Quality Act

As shown in Table 5.2-22, mitigated project operations would result in a Maximum Individual Cancer Risk of 7.65 in 1 million at the maximally exposed residence, which is less than the significance threshold of 10 in 1 million. Mitigated project operations would result in a Chronic Hazard Index of 0.002, which is below the 1.0 significance threshold. The project operational health risk impacts would be **less than significant** after mitigation.

5.3 Biological Resources

This section describes the existing biological resource conditions of the project site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed Rohr Wohl Specific Plan Project (project or proposed project). The discussion in this section is based on the Biological Resources Report, prepared for the project by Rocks Biological Consulting (RBC) in March 2023 (Appendix D).

5.3.1 Existing Conditions

5.3.1.1 Regulatory Framework

Federal

Federal Endangered Species Act

The federal Endangered Species Act of 1973 (ESA), as amended (16 USC 1531 et seq.), provides for listing of endangered and threatened species of plants and animals and designation of critical habitat for listed animal species. The ESA also prohibits all persons subject to U.S. jurisdiction from "taking" endangered species, which includes any harm or harassment. Section 7 of the ESA requires that federal agencies, prior to project approval, consult the U.S. Fish and Wildlife Service (USFWS) and/or the National Marine Fisheries Service to ensure adequate protection of listed species that may be affected by the project.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) (16 USC 703 et seq.) is a federal statute that implements treaties with several countries on the conservation and protection of migratory birds. The list of bird species covered by the MBTA is extensive and is detailed in Title 50 of the Code of Federal Regulations (CFR), Section 10.13. The regulatory definition of "migratory bird" is broad and includes any mutation or hybrid of a listed species, including any part, egg, or nest of such a bird (50 CFR 10.12). Migratory birds are not necessarily federally listed endangered or threatened birds under the ESA. The MBTA, which is enforced by USFWS, makes it unlawful "by any means or in any manner, to pursue, hunt, take, capture, [or] kill" any migratory bird or attempt such actions, except as permitted by regulation. The applicable regulations prohibit the take, possession, import, export, transport, sale, purchase, barter, or offering of these activities, except under a valid permit or as permitted in the implementing regulations (50 CFR 21.11). It is important to note that "take" as defined under the federal MBTA is not synonymous with "take" as defined under the ESA. The MBTA definition of "take" lacks a "harm and harassment" clause comparable to "take" under the ESA; thus, the MBTA authority does not extend to activities beyond the nests, eggs, feathers, or specific bird parts.

State

California Endangered Species Act

Similar to the federal ESA, the California ESA of 1970 provides protection to species considered threatened or endangered by the State of California (California Fish and Game Code, Section 2050 et seq.). The California ESA recognizes the importance of threatened and endangered fish, wildlife, and plant species and their habitats, and

prohibits the taking of any endangered, threatened, or rare plant and/or animal species unless specifically permitted for education or management purposes.

California Fish and Game Code

The California Fish and Game Code regulates the handling and management of the state's fish and wildlife. Most of the code is administered or enforced by the California Department of Fish and Wildlife (CDFW).

Section 1602 regulates activities that would divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake that supports fish or wildlife. CDFW has jurisdiction over riparian habitats associated with watercourses. Jurisdictional waters are delineated by the outer edge of riparian vegetation or at the top of the bank of streams or lakes, whichever is wider. CDFW jurisdiction does not include tidal areas or isolated resources.

Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit the "take, possession, or destruction of bird nests or eggs." Section 3503 states: "It is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." Section 3513 states: "It is unlawful to take or possess any migratory nongame bird as designated in the MBTA or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Bird Treaty Act."

Porter-Cologne Water Quality Control Act

The intent of the Porter-Cologne Water Quality Control Act (Porter-Cologne Act) is to protect water quality and the beneficial uses of water, and it applies to both surface water and groundwater. Under this law, the State Water Resources Board develops statewide water quality plans, and the nine Regional Water Quality Control Boards (RWQCBs) develop basin plans that identify beneficial uses, water quality objectives, and implementation plans. The RWQCBs have the primary responsibility to implement the provisions of both statewide and basin plans. All waters of the state are regulated under the Porter-Cologne Act, including isolated waters that are no longer regulated by the U.S. Army Corps of Engineers. Recent changes in state procedures require increased analysis and mitigation. Developments with impact to jurisdictional waters of the state must demonstrate compliance with the goals of the act by developing stormwater pollution prevention plans, standard urban stormwater mitigation plans, and other measures to obtain a Clean Water Act, Section 401 certification and/or Waste Discharge Requirement.

Local

City of Chula Vista Multiple Species Conservation Program Subarea Plan

The City of Chula Vista Multiple Species Conservation Program (MSCP) Subarea Plan has been prepared as an implementing plan of the MSCP Subregional Plan and is the basis for federal and state incidental take permits for 86 plant and animal species within the City's jurisdiction. The MSCP Subarea Plan was approved by the City of Chula Vista (City) in May 2003 and the City received take authorization in January 2005. The Subarea Plan provides for conservation of upland habitats and species through Preserve design, regulation of impacts and uses, and management of the preserve. The MSCP Subregional Plan, dated August 1998, was prepared for 12 local San Diego jurisdictions, including the City of Chula Vista, and is to be implemented through MSCP Subarea Plans. The MSCP Subarea Plan is implemented through individual Subarea Plans adopted by each jurisdiction receiving Take authorization for covered species. Subarea Plans approved under the Natural Community Conservation Planning

Act would allow "take" of various sensitive species through specific conditions of coverage pursuant to Section 4(d) of the federal ESA. The City has an adopted MSCP Subarea Plan (City of Chula Vista 2003) and the Habitat Loss and Incidental Take (HLIT) Ordinance (City of Chula Vista 2019) regulates the implementation of the Subarea Plan.

The City MSCP Subarea Plan states that of the 86 covered species, 19 sensitive plant and wildlife species are considered adequately protected within the Preserve lands, and the City has obtained Incidental Take Authorization for the remaining 67 plant and wildlife species within the City of Chula Vista. Sensitive plants, animals, and habitats are defined in the MSCP Subarea Plan as rare, endangered, depleted, or declining according to USFWS, CDFW, the California Native Plant Society (CNPS), and/or the City.

MSCP Preserved Lands

The MSCP Conservation Plan identifies specific areas as preserved lands. These lands are set aside for habitat conservation and the preservation of vegetation and wildlife communities within San Diego County. The City and multiple wildlife agencies have a legal agreement to protect and monitor the approximately 80,000 acres of preserved lands. The proposed project site and study area are within the Chula Vista MSCP Planning Area, but not within or adjacent to designated preserved lands under the City MSCP Subarea Plan.

MSCP Non-Covered Projects

Development projects within Development Areas outside of covered projects are regulated by the HLIT ordinance. The HLIT ordinance establishes mitigation standards for biological resources and implements the City's MSCP Subarea Plan for development projects outside the Covered Projects category, as identified in the City's MSCP Subarea Plan. Provisions for protection of Narrow Endemic Species apply to all areas regulated by the HLIT ordinance. The HLIT ordinance calls for impacts to wetlands to be avoided and minimized to the maximum extent practicable and requires mitigation for all permanent impacts to wetlands and natural vegetation at ratios provided in the MSCP Subarea Plan.

Narrow Endemic Species Protection

Narrow Endemic Species have a very restricted habitat that can only occur only in the San Diego County region. Specific protections apply to Narrow Endemic Species pursuant to the City MSCP Subarea Plan. The following specific provisions are applicable to the project site.

Development Areas. Impacts to Narrow Endemic Species from development outside of Covered Projects will be avoided to the maximum extent practicable. Where impacts are demonstrated to be unavoidable, impacts within these Development Areas will be limited to 20% of the total Narrow Endemic Species population within the project site. Findings of equivalency, as defined in Section 5.2.3.6 of the Subarea Plan (City of Chula Vista 2003), will be made by the City for such Take Authorization of the covered Narrow Endemic Species.

Wetlands Protection

As part of the California Environmental Quality Act (CEQA) review, development projects that contain wetlands would be required to demonstrate that impacts to wetlands have been avoided to the greatest extent practicable and, where impacts are nonetheless proposed, that such impacts have been minimized. For unavoidable impacts to wetlands within the Development Area, the MSCP Subarea Plan requires mitigation in accordance with the defined wetlands mitigation ratios. The wetlands mitigation ratios provide a standard for each habitat type but may be adjusted depending on the functions and values of both the impacted wetlands, as well as the wetlands mitigation

proposed by the project. The City may also consider the wetland habitat type(s) being impacted and used for mitigation in establishing whether these standards have been met (City of Chula Vista 2003).

MSCP Adjacency Management Issues

As stated in Section 7.5.2, Adjacency Management Issues, of the City's MSCP Subarea Plan (City of Chula Vista 2003), all new developments are required to adhere to the following adjacency guidelines:

- **Drainage:** All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials and other elements that might degrade or harm the natural environment or ecosystem processes within the Preserve. This can be accomplished using a variety of methods including natural detention basins, grass swales or mechanical trapping devices. These systems should be maintained approximately once a year, or as often as needed, to ensure proper functioning. Maintenance should include dredging out sediments if needed, removing exotic plant materials, and adding chemical-neutralizing compounds (e.g., clay compounds) when necessary and appropriate.
  - Develop and implement urban runoff and drainage plans which will create the least impact practicable for all development adjacent to the Preserve. All development projects will be required to meet NPDES [National Pollutant Discharge Elimination System] standards and incorporate BMPs [best management practices] as defined by the City's Standard Urban Storm [Water] Mitigation Plan (SUSMP).
  - Pursuant to the San Diego Regional Water Quality Control Board Municipal Permit, and the City of Chula Vista Storm Water Management Standards Requirements Manual, which includes the SUSMP, all development and redevelopment located within or directly adjacent to or discharging directly to an environmentally sensitive area (as defined in the Municipal Permit and the Local SUSMP) are required to implement site design, source control, and treatment control BMPs. The BMPs shall, at a minimum include:
    - Control post-development peak storm water runoff discharge rates and velocities to maintain or reduce pre-development downstream erosion and to protect stream habitat;
    - Conserve natural areas where feasible;
    - Minimize storm water pollutants of concern in runoff;
    - Remove pollutants of concern from urban runoff;
    - Minimize directly connected impervious areas where feasible;
    - Protect slopes and channels from eroding;
    - Include storm drain stenciling and signage;
    - Include additional water quality provisions applicable to individual project categories;
    - Ensure that post-development runoff does not contain pollutant loads which cause or contribute to an exceedance of water quality objectives or which have not been reduced to the maximum extent practicable; and,
    - Implement BMPs close to pollutant sources.
  - Require all NPDES-regulated projects to implement a combination of BMPs as close to potential pollutant sources as feasible.
- **Toxic Substances:** All agricultural uses, including animal-keeping activities, and recreational uses that use chemicals or general by-products such as manure, potentially toxic or impactive to wildlife, sensitive species, habitat, or water quality need to incorporate methods on their site to reduce impacts caused by

the application and/or drainage of such materials into the Preserve. Methods shall be consistent with requirements of the RWQCB and NPDES standards.

- **Lighting:** Lighting of all developed areas adjacent to the Preserve should be directed away from the Preserve wherever feasible and consistent with public safety. Where necessary, development should provide adequate shielding with non-invasive plant materials (preferably native), berming, and/or other methods to protect the Preserve and sensitive species from night lighting. Consideration should be given to the use of low-pressure sodium lighting.
- **Noise:** Uses in or adjacent to the Preserve should be designed to minimize noise impacts. Berms or walls should be constructed adjacent to commercial areas and any other use that may introduce noises that could impact or interfere with wildlife utilization of the Preserve. Excessively noisy uses or activities adjacent to breeding areas, including temporary grading activities, must incorporate noise reduction measures or be curtailed during the breeding season of sensitive bird species, consistent with Table 3-5 of the MSCP Subregional Plan.
  - Where noise associated with clearing, grading or grubbing will negatively impact an occupied nest for the least Bell's vireo during the breeding season (March 15 to September 15), noise levels should not exceed 60 L_{eq} [energy equivalent level]. However, on a case by-case basis, if warranted, a more restrictive standard may be used. If an occupied least Bell's vireo nest is identified in a pre-construction survey, noise reduction techniques, such as temporary noise walls or berms, shall be incorporated into the construction plans to reduce noise levels below 60 L_{eq}.
  - Where noise associated with clearing, grubbing or grading will negatively impact, an occupied nest for raptors between January 15 and July 31 or the coastal California gnatcatcher between February 15 and August 15 (during the breeding season), clearing, grubbing or grading activities will be modified if necessary, to prevent noise from negatively impacting the breeding success of the pair. If an occupied raptor or coastal California gnatcatcher nest is identified in a pre-construction survey, noise reduction techniques shall be incorporated into the construction plans. Outside the bird breeding season(s) no restrictions shall be placed on temporary construction noise.
- **Invasives:** No invasive non-native plant species shall be introduced into areas immediately adjacent to the Preserve. All open space slopes immediately adjacent to the Preserve should be planted with native species that reflect the adjacent native habitat. The plant list contained in the Wildland/Urban Interface: Fuel Modification Standards, Appendix L of the MSCP Subarea Plan, must be reviewed and utilized to the maximum extent practicable when developing landscaping plans in areas adjacent to the Preserve.
- **Buffers:** There shall be no requirements for buffers outside the Preserve, except as may be required for Wetlands pursuant to Federal and/or State permits, or by local agency CEQA mitigation conditions. All open space requirements for the Preserve shall be incorporated into the Preserve. Fuel modification zones must be consistent with Section 7.4.4 of the Subarea Plan.

Chula Vista General Plan

The City of Chula Vista General Plan was updated by the City on December 13, 2005, and most recently amended in 2020. The General Plan provides a long-term strategy to address planning issues for the growth and development of the City and is composed of the following six elements: land use and transportation, economic development, public facilities and services, growth management, environmental, and housing (City of Chula Vista 2005). The project site is located in the Bayfront Planning Area and Harbor District subarea of the General Plan (City of Chula Vista 2005). The policies for preserving biological resources in the General Plan are as follows:

Environmental Element

Objective E1: Conserve Chula Vista's sensitive biological resources.

Policy E 1.1: Implement the City of Chula Vista MSCP Subarea Plan

5.3.1.2 Existing Biological Resources

The project site is divided into two parcels, totaling approximately 44.8 acres, and is located along the southern end of the San Diego Bay in the City of Chula Vista, San Diego County, California. The project site is roughly bounded by Laguna Drive and G Street to the north, Interstate 5 and Bay Boulevard to the east, H Street to the south, and Marina Parkway to the west (Figure 4-1). Sweetwater River is located approximately 1.1 miles north of the project site.

Methods

The impacts analysis in this section is based on a biological resources technical report prepared by RBC, which is provided in Appendix D to this EIR. This study consisted of (1) analysis of existing biological information within the study area, (2) general biological survey and vegetation mapping, (3) habitat assessments for special-status species, (4) analysis of potential project impacts on biological resources, and (5) analysis of project conformance with federal, state, and local biological regulations.

RBC prepared field maps using geographic information systems, CDFW's California Natural Diversity Database, USFWS's Information for Planning and Consultation (IPaC) database, and CNPS's electronic Inventory of Rare Plants to identify special-status species that have potential to occur within the project site. RBC also identified soils present on site using Natural Resources Conservation Service data and mapping (Appendix D).

The project study area includes the proposed project site and a 100-foot buffer surrounding the site, resulting in a 60.6-acre study area. RBC biologists visited the project site in April 2022 to conduct general biological surveys for the flora and fauna, vegetation mapping, and a constraints-level assessment for jurisdictional wetlands/waters. Biologists used several tools to conduct their surveys, including binoculars for observation, the Jepson Manual: Vascular Plants of California for plant identification, and local botanical knowledge.

General Physical Characteristics

RBC found that the approximately 60.6-acre study area is primarily composed of developed land with ornamental vegetation and disturbed habitat. The study area is not within or directly adjacent to lands designated as a preserve under the City MSCP Subarea Plan, although a preserve does occur 500 feet to the north. Additionally, there are no topographical depressions or basins with the project site that would support vernal wildlife and plant species (Appendix D).

Vegetation Communities

The study area is composed of developed land primarily made of up industrial buildings and parking lots. RBC identified four vegetation types within the proposed project study area during the biological field surveys. These consist of upland habitats including developed area, disturbed habitat, eucalyptus woodland, and ornamental vegetation. Acreages of these vegetation types are identified in Table 5.3-1, and each is discussed in more detail

following the table. The tiers cited in Table 5.3-1 and in each upland habitat description represent the sensitivity of the habitat, with Tier I having the highest sensitivity and Tier IV having low or no sensitivity. The listed Tier IV habitats are not considered significant and do not require mitigation. A list of floral species observed or detected on site is included in the biological technical report (Appendix D).

Table 5.3-1. Vegetation Communities within the Study Area

Vegetation Type	MSCP Tier Habitat Type	Total Acreage Inside Study Area
Urban/developed	Tier IV, other uplands	56.7
Ornamental	Tier IV, other uplands	0.3
Disturbed habitat	Tier IV, other uplands	2.4
Eucalyptus woodland	Tier IV, other uplands	1.1
	Total	**60.6**

Sources: Appendix D; Oberbauer et al. 2008.

Urban/Developed

Urban/Developed spaces are areas that have been structurally and physically altered to an extent that native vegetation can no longer be supported. "Developed land is characterized by permanent or semi-permanent structures, pavement or hardscape, and landscaped areas that often require irrigation. Areas where no natural land is evident due to a lot of debris or other materials being placed upon it may also be considered Urban/Developed." These communities are unvegetated or landscaped with a variety of ornamental (usually non-native) plants and are distributed throughout San Diego County (Oberbauer et al. 2008).

The 56.7 acres of developed areas within the study area include industrial buildings, parking lots, and paved streets. These developed areas consist of structures like buildings and roads, that can support little to no native vegetation.

Ornamental

RBC identified 0.3 acres of ornamental vegetation in the northern portion of the study area. These areas are affiliated with nearby commercial developments Ornamental vegetation consists of non-native landscapes, plants, and/or specific decorative garden species that are planted in association with structures and developments or occur within the native habitats. Species within this community and study area include American agave (*Agave americana*), Brazilian pepper tree (*Schinus terebinthifolius*), Mexican fan palm (*Washingtonia robusta*), bottlebrush (*Melaleuca* sp.), and olive (*Olea europaea*) (Appendix D).

Disturbed Habitat

Disturbed habitat consists of areas that have been physically disturbed (via previous human intervention) and are no longer considered as native or naturalized vegetation but continues to retain a soil substrate. Typically, present vegetation is almost exclusively non-native plant species, such as ornamentals or exotic species that can take advantage of disturbances or show signs of possible animal usage. These conditions "can remove any capability of providing viable natural habitat for uses other than dispersal. Examples of disturbed land include areas that have been graded, repeatedly cleared for fuel management purposes and/or experienced repeated use that prevents natural revegetation (i.e., dirt parking lots, trails that have been present for several decades), recently graded firebreaks, graded construction pads, construction staging areas, off-road vehicle trails, and old homesites." These

communities are distributed throughout San Diego County, especially in highly populated areas and regions with increased off-roading activities (Oberbauer et al. 2008).

RBC identified 2.4 acres of disturbed habitat within the study area, located in isolated patches along the periphery of the project site. "Disturbed habitat on site consists of bare soil or gravel with sparse ruderal, non-native vegetation, as well as a small number of native broom baccharis (*Baccharis sarothroides*), mulefat (*B. salicifolia*), and deerweed (*Acmispon glaber* var. *glaber*)" (Appendix D).

Eucalyptus Woodland

"Eucalyptus woodland habitats can range from single-species thickets with little to no shrubby understory to scattered trees over a well-developed herbaceous and shrubby understory. In most cases, eucalyptus forms a dense stand with a closed canopy. Eucalyptus species produce a large amount of leaf and bark litter, the chemical and physical characteristics of which limit the ability of other species to grow in the understory, decreasing floristic diversity. Overstory composition is typically limited to one species of the genus, or mixed stands composed of several *Eucalyptus* species; few native overstory species are present within eucalyptus planted areas, except in smaller cleared pockets" (Oberbauer et al. 2008). Characteristic species of the community include *Eucalyptus* spp., including *E. globulus* (blue gum) and *E. camaldulensis* (river red gum). They are found in San Diego County and in coastal or foothill regions with access to water stores.

The 1.1-acre eucalyptus woodland habitat occurs along the eastern project buffer and within the small patches in the southern portion of the project site that are dominated by gum trees, which are not native and were planted or became naturalized in these areas. Blue gum and river red gum are the dominant species within the study area of the eucalyptus woodland habitat (Appendix D).

Rare, Threatened, Endangered, Endemic, Sensitive and/or City MSCP Subarea Plan-Covered Species

In preparation of the Biological Technical Report, general surveys were conducted for plant and animal species and habitats that are considered sensitive according to the USFWS, CNPS, and the CDFW's California Natural Diversity Database record for the National City 7.5-minute quadrangle. RBC assessed each special-status species for its potential to occur within the study area, as shown in Table 5.3-2. For the general biological surveys, faunal activity at the time was moderate with most spring season species unavailable and the late spring and summer flowering species not present. RBC did not observe any federally and/or state-listed, California Rare Plant Rank, and/or City MSCP Subarea Plan-covered plant species in the study area. A list of all plant species that were observed in the study area is provided in Appendix E to the Biological Technical Report (Appendix D).

City MSCP Subarea Plan Narrow Endemic Plant Species Potential for Occurrence

Narrow Endemic Species are those with very restricted habitat that only occur in the San Diego County region. Specific protections apply to Narrow Endemic Species in accordance with the City MSCP Subarea Plan. As shown in Table 5.3-2, RBC found that no Narrow Endemic Species have a moderate or high potential to occur on the project site due to the lack of suitable habitat. project site is 99% developed with impervious surfaces that do not allow for native plant growth. The small areas of the project site composed of disturbed habitat (0.2 acres) and planted eucalyptus (0.1 acres) are not suitable for endemic plant species because they have been historically graded and are isolated from any areas of natural habitat. Additionally, the project site is composed solely of Huerhuero–Urban

land complex soils and made lands, which are not considered to be hydric soils that would support endemic plant species associated with wetlands.

Table 5.3-2. Potential for City MSCP Subarea Plan Narrow Endemic Species to Occur

Species	Potential to Occur
Dehesa bear-grass (*Nolina interrata*)	None. Species occurs in gabbroic, metavolcanic, or serpentinite soils in chaparral which are not present on site. This perennial species would have been observed if present.
Dunn's mariposa lily (*Calochortus dunnii*)	None. Species occurs in gabbroic or metavolcanic, rocky soils in closed-cone coniferous forest, chaparral, and valley and foothill grasslands, which are not present on site.
Encinitas baccharis (*Baccharis vanessae*)	None. Species occurs in chaparral and cismontane woodlands, which are not present on site. This perennial species would have been observed if present.
Felt-leaved monardella (*Monardella hypoleuca* ssp. *lanata*)	None. Species occurs in chaparral and cismontane woodland, which are not present on site.
Gander's pitcher sage (*Lepechinia ganderi*)	Low. Species occurs in gabbroic or metavolcanic soils in closed-cone coniferous forest, chaparral, coastal scrub, and valley and foothill grasslands, which are not present on site. This perennial species would have been observed if present.
Lakeside ceanothus (*Ceanothus cyaneus*)	None. Species occurs in closed-cone coniferous forest and chaparral, which are not present on site. This perennial shrub would have been observed if present.
Nevin's barberry (*Berberis nevinii*)	None. Species occurs in chaparral, cismontane woodland, coastal scrub, and riparian scrub, which are not present on site. This perennial shrub would have been observed if present.
Orcutt's brodiaea (*Brodiaea orcuttii*)	Low. Species occurs on mesic, clay soils within closed-cone coniferous forest, chaparral, cismontane woodland, meadows and seeps, valley and foothill grassland, and vernal pools, which are not present on site.
Otay tarplant (*Deinandra conjugens*)	Low. Species occurs on clay soils within coastal scrub, valley and foothill grassland, which are not present on site.
Palmer's ericameria (*Ericameria palmeri* ssp. *palmeri*)	None. Species occurs on mesic soils in chaparral and coastal scrub, which are not present on site. This perennial shrub would have been observed if present.
Salt marsh bird's-beak (*Chloropyron [Cordylanthus] maritimum* ssp. *maritimum*)	Low. Species occurs in coastal dunes, and coastal salt marshes and swamps, which are not present on site.
San Diego ambrosia (*Ambrosia pumila*)	None. Found in sandy loam or clay soils, often in disturbed areas, sometimes alkaline, chaparral, coastal scrub, valley and foothill grassland, vernal pools, which are not present on site. This perennial species would have been observed if present.

Table 5.3-2. Potential for City MSCP Subarea Plan Narrow Endemic Species to Occur

Species	Potential to Occur
San Diego thorn-mint (*Acanthomintha ilicifolia*)	Low. Found in openings on clay soils within chaparral, coastal scrub, valley and foothill grasslands, and vernal pools, which are not present on site.
Shaw's agave (*Agave shawii*)	None. Species found in maritime succulent scrub, coastal bluff scrub, and coastal scrub, which are not present on site. This perennial species would have been observed if present.
Short-leaved dudleya (*Dudleya blochmaniae* ssp. *brevifolia*)	None. Species occurs on rocky, often clay or serpentine soils within coastal bluff scrub, chaparral, coastal scrub, and valley and foothill grassland, which are not present on site.
Snake cholla (*Cylindropuntia californica* var. *californica*)	None. Species occurs in chaparral and coastal scrub, which are not present on site. This perennial species would have been observed if present.
Thread-leaved brodiaea (*Brodiaea filifolia*)	Low. Species occurs on clay soils within chaparral (openings), cismontane woodland, coastal scrub, playas, valley and foothill grassland, and vernal pools, which are not present on site.
Variegated dudleya (*Dudleya variegata*)	Low. Species occurs on clay soils within chaparral, cismontane woodland, coastal scrub, valley and foothill grassland, vernal pools, which are not present on site.
Willowy monardella (*Monardella linoides* ssp. *viminea*)	None. Species occurs on alluvial ephemeral washes in chaparral, coastal scrub, riparian habitats, which are not present on site. This perennial species would have been observed if present.

Source: Appendix D.

Wildlife

Special-Status Wildlife Observed within the Study Area

One wildlife species on the CDFW Watch List was observed nesting on the project site, a large raptor called an osprey (*Pandion haliaetus*). Also, the American peregrine falcon (*Falco peregrinus anatum*), which is a CDFW fully protected species, was observed flying through the project site. A full list of all the wildlife species observed on site is included in Appendix F to the Biological Technical Report (Appendix D to this EIR).

Osprey

The Biological Technical Report states that osprey will only nest near large bodies of water where fish are present. Nests are made of sticks and placed on snags, dead-topped trees, cliffs, and manmade structures. Open-branched trees or other perches are required near the nest for perching and landing, and nests are generally within 400 meters of fish-producing water (Appendix D).

During the April 2022 study area survey, RBC observed osprey nesting in the southwest corner of the project site. Two nests (one active and one inactive) were located atop abandoned lighting structures. Both adults were observed on site as well as three nestlings approximately 4 to 6 weeks old. The female utilized the inactive historic

nest to the north of the active nest as a perch. However, these nests were removed on October 21, 2022, once fledglings were no longer dependent on the nests, in compliance with the MBTA and following consultation with CDFW. RBC documented that no direct impacts on osprey or other avian species occurred during removal of the two on-site inactive osprey nests and associated manmade structures. Based on the historic presence of nesting osprey and the continued presence of other similar manmade structures suitable for nesting, osprey have a moderate potential for occurrence on site (Appendix D).

American Peregrine Falcon

The American peregrine falcon is considered a fully protected species by CDFW when nesting. This species breeds in several different habitats, including urban areas. The most common peregrine falcon nesting locations in California are cliffs, tall buildings, and bridges; they rarely will use older nests of other bird species. This species does not build nests; rather, their eggs are laid in indentations on cliffs, buildings, or bridges. American peregrine falcons usually prey on small to medium birds such as ducks, pigeons, and songbirds.

The American peregrine falcon was listed as endangered under the federal ESA in 1970 and the California ESA in 1971 because the number of known breeding pairs had dropped by 95% from the early 1900s to 1970 due to habitat loss and the widespread use of the pesticide DDT, which caused eggshell thinning that resulted in failed nesting attempts. DDT was banned in 1972 and widespread recovery efforts were implemented. The American peregrine falcon has recovered across its range and was delisted by USFWS in 1999 and by CDFW in 2009.

During the general biological survey, RBC observed one immature American peregrine falcon was “flying through the western portion of the project site. As it was passing through, it dove between vacant industrial buildings where rock pigeon, a common prey for peregrine falcon, had previously been observed. The observed individual did not appear to occupy the project site, and evidence of on-site nesting or long-term use was not documented” (Appendix D).

Although American peregrine falcon was observed during the survey, RBC concluded that the project site has low potential to support nesting by this species. Although abundant avian prey is available throughout the project site, the buildings on site are shorter than typical peregrine falcon nesting locations; therefore, the project site does not provide suitable nesting habitat (Appendix D).

Special-Status Wildlife Potential for Occurrence

RBC identified special-status wildlife species with potential to occur in the project region by searching the California Natural Diversity Database and the Information for Planning and Conservation database for a 3-mile radius surrounding the study area. RBC then used best professional judgment based on the presence/absence of suitable habitat for special-status species and professional experience to determine the potential for each species to occur on site. RBC noted that clayey soil (Huerhuero–Urban land complex, 2% to 9% slopes) composes the western extent of the project site. No depressional areas or vernal pools suitable to support ponding or Anostraca species are present within the project site as all on-site areas of lower topography are associated with asphalt drainages (Appendix D). Appendix D to the Biological Technical Report identifies species potential for occurrence within or immediately adjacent to the project site.

RBC concluded that two CDFW species of special concern, pallid bat (*Antrozous pallidus*) and western mastiff bat (*Eumops perotis californicus*), have a moderate potential to occur on site and that no other special-status and/or

City MSCP Subarea Plan-covered wildlife species have a moderate or high potential to occur on site due to the lack of suitable habitat (Appendix D).

Pallid Bat

Pallid bat occurs throughout California at low elevations and inhabits dry habitats such as grasslands, shrublands, woodlands, and forests. The pallid bat is a nocturnal species that day roosts in caves, rocks, mines, hollow trees, and buildings. The species forages in open areas above ground level and captures prey on ground. Pallid bats consume a variety of insects and arachnids. They form maternity colonies in early April, do not migrate, and will hibernate in small groups or solely during winter near their roost.

Pallid bats have had a major decline on the California coast, as they are highly sensitive to disturbances in their roosting sites. Their roosting sites are critical for maintaining normal metabolic function and growth. Disturbance factors include the destruction of roost sites, closure of mines, loss of roost trees, pest extermination in buildings, and pesticide use.

RBC found that the vacant buildings on the project site have crevices and small rooms that could be utilized by pallid bats for roosting. The project site does not support highly suitable foraging habitat; however, disturbed lots to the north and south of the site are open and support prey species consumed by this species. As such, pallid bat has a moderate potential for occurrence on the project site (Appendix D).

Western Mastiff Bat

Western mastiff bat is found in open, semi-arid habitats such as woodlands, coastal scrub, grasslands, palm oases, chapparal, desert scrub, and urban land. This species forages in open habitats by catching insects in the air and they typically eat winged insects that are active at night, such as moths, crickets, beetles, and grasshoppers. Western mastiff bat is the largest species of native bat in the United States. Their large wings enable rapid flight but limit maneuverability; thus, they cannot fly from a flat surface and instead must free-fall to begin flight. Roosts must be high enough for them to gain speed as they fall, generally greater than 9 feet in height. This species requires crevices for roosting, typically in rocks, buildings, trees, and tunnels. They sometimes share roosts with other species, including pallid bat. Western mastiff bats are non-migratory and active all year round.

Western mastiff bats are threatened by urbanization, activities that destroy or disturb habitats, recreational climbing, pest control in buildings, pesticide applications on agricultural lands, and loss of open drinking water sites.

RBC found that the vacant buildings on the project site have high crevices that could be utilized by western mastiff bats for roosting. The project site does not support highly suitable foraging habitat; however, moderately suitable foraging habitat is present nearby on undeveloped lands north and south of the site. As such, western mastiff bat has a moderate potential for occurrence on the project site (Appendix D).

Potential Federal and State Jurisdictional Aquatic Resources

RBC conducted a constraints-level aquatic resources assessment of the project site and study area to identify areas that may be considered potentially jurisdictional under the U.S. Army Corps of Engineers pursuant to Section 404 of the Clean Water Act; the RWQCB pursuant to Section 401 of the Clean Water Act and the Porter-Cologne Act; CDFW pursuant to California Fish and Game Code Section 1602; or the California Coastal Commission pursuant to California Public Resources Code Section 3000 et seq., but did not conduct a formal jurisdictional delineation per

federal and state guidelines. RBC reviewed the U.S. Geological Survey National Hydrography Dataset and the USFWS National Wetland Inventory to determine if potentially jurisdictional aquatic features had been previously identified within the study area. During the site survey, RBC assessed areas with depressions, drainage patterns, wetland vegetation, or riparian vegetation for potential jurisdictional status, with focus on the presence of defined channels, soils, and hydrology (Appendix D).

RBC observed a paved road along the western project boundary with six in-ground stormwater collection grates. The paved areas near the grates have a slight slope and may convey sheet flow during storm events; however, this paved road did not appear to be a potentially jurisdictional aquatic resource. The in-ground stormwater collection grates that were also observed are along the east side an industrial building in the western part of the project site which also did not appear to contain a potentially jurisdictional aquatic resource.

No other areas with depressions (including vernal pools), drainage patterns, defined channels, and/or wetland vegetation were observed during the survey. Additionally, the project site is composed solely of Huerhuero–Urban land complex soils that are not considered to be hydric within San Diego County. RBC determined that the project site does not support areas that could be considered jurisdictional by the U.S. Army Corps of Engineers, RWQCB, California Coastal Commission, and CDFW based on the results of the constraints-level aquatic resources assessment.

5.3.2 Thresholds of Significance

The significance criteria used to evaluate the project impacts to biological resources are based on Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.). According to Appendix G, a significant impact related to biological resources would occur if the project would:

1. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.
2. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.
3. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
4. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.
5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
6. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

5.3.3 Impacts

Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Direct Impacts

Vegetation Communities

The project site encompasses 44.8 acres of land and the proposed project would impact the land cover types shown in Table 5.3-3.

Table 5.3-3. Vegetation Communities within the Study Area

Vegetation Type	MSCP Tier Habitat Type	Project Impacts outside Preserve Lands (Acres)	Project Impacts within Preserve Lands (Acres)
Urban/developed	Tier IV, other uplands	44.5	0.00
Disturbed habitat	Tier IV, other uplands	0.2	0.00
Eucalyptus woodland	Tier IV, other uplands	0.1	0.00
	Total	**44.8**	**0.00**

Source: Appendix D.

The entire project site consists of Tier IV habitats. Tier IV habitats are not considered significant and do not require mitigation. Because no impacts on Tier I–III habitats would occur with project implementation, **no impacts** to vegetation communities/land uses would occur and no mitigation is required.

Special-Status Plant Species

Special-status plant species were not documented within the study area and do not have a moderate or high potential to occur. The project would not impact special-status plant species covered under federal, state, or local laws. As such, impacts on special-status plants would be **less than significant**.

Special-Status Wildlife Species

Two documented special-status wildlife species were found within the study area, American peregrine falcon and osprey. No additional special-status wildlife species were documented within the study area or identified as having a moderate to high potential to occur.

American Peregrine Falcon

As summarized in Section 5.3.1.2, the American peregrine falcon was observed briefly passing through the project site and no evidence of long-term use or nesting was observed. This species has a low potential to nest on site. However, prior to mitigation, impacts would be **potentially significant**. **Mitigation Measure (MM) BIO-1** (Nesting Raptors; see Section 5.3.5, Mitigation Measures) would be implemented to reduce impacts to a less-than-significant level.

Osprey

Two osprey nests were observed at the project site (one historic and one active in spring 2022). These nests were observed on light poles within a developed parking lot on the project site. Demolition of all development within that portion of the project site, including the light poles, is proposed. Osprey nests on the project site had been used for at least 2 consecutive years (2021 and 2022; CCB 2022) and an active nest site was also recorded in 2006 (Dudek 2006). Regarding direct impacts, osprey have a moderate potential for nesting on the site; therefore, impacts would be **potentially significant** prior to mitigation (**MM-BIO-2, Osprey Nests**).

Migratory Birds

The study area has the potential to support nests that would be protected under the MBTA and/or the California Fish and Game Code Section 3503, under which it is unlawful to "take, possess, or needlessly destroy" avian nests or eggs. Thus, if additional vegetation clearing or grading happens during the breeding season, impacts would be **potentially significant** and mitigation (**MM-BIO-3, Nesting Birds**) would be required.

Bats

Pallid bat and western mastiff bat have a moderate potential to occur on the project site, as the on-site vacant buildings may support suitable roosting habitat for both species. Pallid bats are considered rare along the San Diego coast; the most recent pallid bat observation was documented approximately 0.5 miles north of the project site in 2015. The nearest record of western mastiff bat is approximately 3 miles from the project site.

The area is not known to support roosting colonies of special-status bats; therefore, construction is not anticipated to substantially affect either species. Nonetheless, prior to mitigation (**MM-BIO-4, Special-Status Bats,** and **MM-BIO-5, Avoidance Measures for Special-Status Bats**) impacts would be **potentially significant**.

Indirect Impacts

Indirect impacts to special-status bird species may occur if construction is conducted during the nesting season (generally February 15–August 31) and the nesting raptor season (January 15–July 31). Potential short-term or temporary indirect impacts to special-status plants or wildlife (if they occur) adjacent to but outside the project site could primarily result from construction activities and include impacts related to or resulting from the generation of fugitive dust; changes in hydrology resulting from construction, including sedimentation and erosion; and the introduction of chemical pollutants (including herbicides).

Ospreys tend to exhibit strong site fidelity and nest reuse, including by individuals other than the original nest builders. In expanding populations, nest reuse rates are as high as 95% (Appendix D). Therefore, indirect impacts on this species resulting from the removal of the two historic nests on site were considered. A field survey conducted by RBC biologists on June 8, 2022, found five other active osprey nests within 1.5 miles of the project site. In addition, two inactive historic osprey nests and at least 10 structures that appear to be suitable for osprey nesting were located within 1.5 miles of the project site. Therefore, due to the presence of other unoccupied nesting habitat in the local area, removal of the on-site nests outside of breeding season would not likely result in a substantial adverse indirect effect to the local population.

Dust control will be implemented per the Air Quality Technical Report (Appendix C) to limit impacts of fugitive dust on sensitive habitat and species. The project would incorporate methods to control runoff, including site design,

source control, and treatment control BMPs. The project would be required to meet NPDES regulations and incorporate BMPs during construction. In addition, permanent BMPs would be incorporated in accordance with the City's SUSMP.

Furthermore, the project must comply with the guidelines set forth in the "Adjacency Management Issues" discussion in Section 7.5 of the City's MSCP Subarea Plan, which requires implementation of BMPs to ensure that adjacency issues do not arise due to project activities. These practices include, but are not limited to, the use of silt fencing or fiber rolls around work areas, restriction of construction activities to daylight hours, and use of non-invasive plant species in ornamental landscaping. Therefore, compliance with regional and local laws, regulations, and policies, would ensure that indirect impacts would be **less than significant**.

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

Of the 44.8 acre project iste, 44.5 acres are developed, 0.2 acres are disturbed habitat, and 0.1 acres are eucalyptus woodland. All of these vegetation communities are Tier IV habitat, and the project site is not located within preserved lands. Pursuant to the City MSCP Subarea Plan, impacts to Tier IV habitats are not considered significant. Thus, the proposed project would result in **no impact** to riparian habitats or other sensitive natural communities.

Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

The constraints-level aquatic resources assessment conducted during preparation of the Biological Technical Report found that no jurisdictional aquatic resources, vernal pools, or any other aquatic features occur on site. There are no depressions, drainage patterns, defined channels, and/or wetland vegetation. Additionally, the project site is composed solely of Huerhuero–Urban land complex soils and made lands, which are not considered to be hydric within San Diego County. As such, the project site does not support areas that could be considered jurisdictional by the U.S. Army Corps of Engineers, RWQCB, California Coastal Commission, or CDFW. Thus, the proposed project would have **no impact** on any such resources.

Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

The proposed project site is not identified as a regional wildlife corridor per the City MSCP Subarea Plan. The site is already developed and fenced and there are no adjacent native habitats. The project does not propose any new barriers, such as new development or fencing, that would prevent wildlife movement; therefore, there would be **no impacts** on wildlife corridors due to project implementation.

Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The MSCP Subarea Plan is a local policy document that provides for conservation of upland habitats and species through preserve design, regulation of impacts and uses, and management of the preserve. The project site lies within the boundaries of the City's MSCP Subarea Plan, within Development Areas outside of covered projects and outside of the preserve area. However, a preserve area does occur approximately 500 feet north of the project site. Nonetheless, all new developments must adhere to specific guidelines listed above in the regulatory framework section under MSCP Adjacency Management Issues. Following is an analysis of the project's compliance with each of the MSCP Adjacency Management Issues:

Drainage. Construction activities would be required to implement BMPs including, but not limited to, the use of silt fencing or fiber rolls around active work areas. Once operational, a storm drainage system (curbs, gutters, inlets etc.) would convey water through the site to detention basins that would allow for control, treatment, and filtration. BMPs would be integrated into the project design to ensure water quality impacts to downstream drainages would be avoided.

Toxic Substances. The project does not propose the use or release of toxic substances that could harm biological resources. Further, the project would implement BMPs to ensure no project materials are discharged from the project site. All methods used would be consistent with requirements of the RWQCB and NPDES standards.

Lighting. Construction activities would be performed during daylight hours to avoid the need for light shielding. Should lighting be required on site, the project would implement BMPs to protect preserve lands and sensitive species from night lighting. All lighting for operation of the project would provide adequate shielding as necessary.

Noise. The project site is not occupied by the coastal California gnatcatcher (*Polioptila californica californica*) or the least Bell's vireo (*Vireo bellii pusillus*). Raptors, such as osprey, are known to use the project site and the potential for other nesting raptors is moderate, due to the presence of ornamental trees and manmade structures suitable for nesting. If demolition or ground-disturbing activities are initiated during the raptor breeding season (generally January 15–July 31), a survey will be required to identify any potential noise impacts on nesting raptors. If necessary, noise reduction techniques will be implemented.

Invasives. Per the project's landscape plans, no invasive plant species would be used during ornamental landscaping associated with the project. Invasive species are those determined by the City of Chula Vista and identified in the MSCP Subarea Plan, Appendix N, List of Invasive Species.

Buffers. The project would not occur within or immediately adjacent to any preserve lands. As such no buffers are proposed.

In addition, the City's General Plan Policy E.1 (City of Chula Vista 2005) and Municipal Code Section 14.20 require conservation of the City's sensitive biological resources and compliance with the City's SUSMP. The project would not significantly impact City-designated sensitive areas and/or cause non-stormwater to discharge into stormwater systems. The project would comply with applicable drainage and stormwater permits and implement features such

as vegetated detention/water quality basins to avoid the potential release of toxins, chemicals, and other elements from entering the City's stormwater system.

The proposed project would involve removal of several trees. The 1.1-acre eucalyptus woodland habitat occurs along the eastern project site and within the small patches in the southern portion of the project site that are dominated by gum trees, which are not native and were planted or became naturalized in these areas. The City does not have any codes specific to tree removal or tree preservation. The closest related code would refer to the City Municipal Code 12.32.160, which states that any tree, palm, shrub or plant shall be authorized (by the City's Department of Public Works) to be removed to remedy a dangerous condition.

The proposed project would abide by all local policies and ordinances protecting biological resources in the City of Chula Vista. However, in order to ensure the project's compliance with the MSCP Subarea Plan, mitigation (**MM-BIO-6**, **MSCP Subarea Plan Consistency and Adjacency**) would be required. Prior to mitigation impacts would be **potentially significant**.

5.3.4 Level of Significance prior to Mitigation

Prior to mitigation, the proposed project would have **potentially significant** impacts associated with special-status wildlife. Impacts would be reduced to a less-than-significant level after implementation of the mitigation measures listed in Section 5.3.5.

5.3.5 Mitigation Measures

The following mitigation measures would be required in order to reduce potential biological impacts:

MM-BIO-1 Nesting Raptors. Vegetation clearing, structure removal, and ground disturbing activities should be conducted outside of the raptor nesting season (January 15–July 31), where feasible. If these activities occur during the raptor nesting season, a qualified biologist shall conduct a nesting raptor survey within 3 days prior to any disturbance of the project site, including tree and shrub removal, disking, demolition activities, and grading. If active raptor nests are identified, the biologist shall establish suitable buffers around the nests depending on the level of activity within the buffer and species observed, and no construction activity may occur within the buffer areas until the nests are no longer occupied and the juvenile birds can survive independently from the nests, as determined by the qualified biologist. Raptor species will generally have an avoidance buffer of 500 feet; however, these buffers may be reduced in consultation with the California Department of Fish and Wildlife. In addition, noise reduction measures consistent with the City of Chula Vista Multiple Species Conservation Program Subarea Plan shall be implemented if deemed necessary by the qualified biologist. If active nests are not identified, vegetation clearing, and ground-disturbing activities may commence. If ground-disturbing activities are scheduled outside the raptor nesting season, a nesting raptor survey will not be required.

MM-BIO-2 Osprey Nests. Should any osprey nests be established within the project site prior to commencement of construction, nesting structures shall be removed only during the non-breeding season (January 15 to July 31) and subject to monitoring by a qualified biologist during nest removal to ensure there are no direct impacts on osprey who may use the structures as perches during non-breeding season.

MM-BIO-3 Nesting Birds. Vegetation clearing, structure removal, and ground-disturbing activities should be conducted outside of the nesting season (generally February 15–August 31). If these activities occur during the nesting season, a qualified biologist will conduct a nesting bird survey within 3 days prior to any disturbance of the project site, including tree and shrub removal, disking, demolition activities, and grading. If active nests are identified, the biologist shall establish suitable buffers around the nests depending on the level of activity within the buffer and species observed, and the buffer areas shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests. Bird species other than raptors will have an avoidance buffer of 300 feet. These buffers may be reduced in consultation with the California Department of Fish and Wildlife. If active nests are not identified, vegetation clearing and ground-disturbing activities may commence. If ground-disturbing activities are scheduled outside the nesting season, a nesting bird survey may not be required.

MM-BIO-4 Special-Status Bats. Pre-construction surveys for special-status bat species shall be conducted by a qualified biologist prior to demolition of buildings and other structures potentially used for roosting. Pre-construction surveys shall take place no more than 14 days prior to the start of demolition activities. If active roosts are identified, a biological monitor shall be employed to direct avoidance measures (identified in **MM-BIO-5**). Following completion of the survey, a report will be submitted to the City of Chula Vista that documents the findings.

MM-BIO-5 Avoidance Measures for Special-Status Bats. If special-status bat species are detected during pre-construction surveys, biological monitoring shall be conducted by a qualified biologist to ensure that project activities do not result in direct take. The biologist shall be present for all demolition activities in areas known or suspected to support roosting bats. The biological monitor shall perform clearance surveys at the start of each workday in areas scheduled for immediate demolition. The monitor will direct project activities away from special-status bat species, should they be found on site, to ensure that impacts on these species are avoided to the fullest extent possible. If present, bats are expected to flush from the project site at the onset of demolition activities. However, if they persist on site through demolition of non-roost site areas, consultation with the California Department of Fish and Wildlife may be required.

MM-BIO-6 MSCP Subarea Plan Consistency and Adjacency. The project must comply with the guidelines set forth in the 'Adjacency Management Issues' discussion of Section 7.5 of the City MSCP Subarea Plan, which requires implementation of best management practices to ensure that adjacency issues do not arise due to project activities. These practices include, but are not limited to, the use of silt fencing or fiber rolls around work areas, restriction of construction activities to daylight hours, and use of non-invasive plant species in ornamental landscaping. In addition, the project will comply with the City's SUSMP which requires measures to control erosion during and following construction.

5.3.6 Level of Significance after Mitigation

The mitigation measures listed in Section 5.3.5 would reduce potential impacts associated with biological resources to a **less-than-significant** level.

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5.4 Cultural and Tribal Cultural Resources

This section describes the existing cultural resources conditions of the project site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed Rohr Wohl Specific Plan Project (project or proposed project). The discussion in this section is based on the Phase I Cultural Resources Survey for the project, prepared for the project by Brian F. Smith & Associates (BFSA) in August 2024 (Appendix E).

5.4.1 Existing Conditions

5.4.1.1 Regulatory Framework

Federal

National Historic Preservation Act

The National Historic Preservation Act (NHPA) (54 USC 300101 et seq.) establishes the nation's policy for historic preservation and a program for the preservation of historic properties by requiring federal agencies to consider effects to significant cultural resources (e.g., historic properties) prior to undertakings, which includes a project, activity, or program either funded, permitted, licenses, or approved by a federal agency.

Section 106 of the NHPA requires federal agencies to consider the effects of projects on historic properties (resources included in or eligible for the National Register of Historic Places [NRHP]). It also gives the Advisory Council on Historic Preservation and the state historic preservation offices an opportunity to consult. Federal agencies issuing permits for the proposed project will be required to comply with NHPA requirements.

Executive Order 11593, Protection and Enhancement of the Cultural Environment

Executive Order 11593 (36 FR 8921) (1) orders the protection and enhancement of the cultural environment through requiring federal agencies to administer the cultural properties under their control in a spirit of stewardship and trusteeship for future generations; (2) initiates measures necessary to direct their policies, plans, and programs in such a way that federally owned sites, structures, and objects of historical, architectural, or archaeological significance are preserved, restored, and maintained for the inspiration and benefit of the people; and (3) in consultation with the Advisory Council on Historic Preservation, institutes procedures to ensure that federal plans and programs contribute to the preservation and enhancement of non-federally owned sites, structures, and objects of historical, architectural, or archaeological significance (16 USC 470-1).

National Register of Historic Places

The NRHP is the nation's official list of historic places. The NRHP is overseen by the National Park Service and requires that a property or resource eligible for listing in the NRHP meet one or more of the following four criteria at the national, state, or local level to ensure integrity and obtain official designation:

- **Criterion A.** The property is associated with events that have made a significant contribution to the broad patterns of our history.

- **Criterion B.** The property is associated with the lives of persons significant to our past. Eligible properties based on this criterion are generally those associated with the productive life of the individual in the field in which the person achieved significance.
- **Criterion C.** The property embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic value, or represents a significant and distinguishable entity whose components lack individual distinction.
- **Criterion D.** The property has yielded, or is likely to yield, information important to prehistory or history.

In addition to meeting at least one of these four criteria, eligible or listed properties must also retain sufficient physical integrity of those features necessary to convey historic significance. The NRHP has identified the following seven aspects of integrity: (1) location, (2) design, (3) setting, (4) materials, (5) workmanship, (6) feeling, and (7) association.

Properties are nominated to the NRHP by the state historic preservation officer of the state in which the property is located, by the federal preservation officer for properties under federal ownership or control, or by the tribal preservation officer if on tribal lands. Listing in the NRHP provides formal recognition of a property's historic, architectural, or archaeological significance based on national standards used by every state. Once a property is listed in the NRHP, it becomes searchable in the NRHP database of research information. Documentation of a property's historic significance helps encourage preservation of the resource.

State

California Environmental Quality Act

The California Environmental Quality Act (CEQA) requires that all private and public activities not specifically exempted be evaluated for the potential to impact the environment, including effects to historical resources. Historical resources are recognized as part of the environment under CEQA. It defines historical resources as "any object, building, structure, site, area, or place, which is historically significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (Division I, California Public Resources Code, Section 5021.1[b]).

Lead agencies have a responsibility to evaluate historical resources against the California Register of Historical Resources (CRHR) criteria prior to making a finding as to a proposed project's impacts to historical resources. Mitigation of adverse impacts is required if the proposed project will cause substantial adverse change. Substantial adverse change include demolition, destruction, relocation, or alteration such that the significance of an historical resource would be impaired. While demolition and destruction are obvious significant impacts, it is more difficult to assess when change, alteration, or relocation crosses the threshold of substantial adverse change. The CEQA Guidelines provide that a project that demolishes or alters those physical characteristics of an historical resource that convey its historical significance (i.e., its character-defining features) can be considered to materially impair the resource's significance.

The CRHR is used in the consideration of historic resources relative to significance for purposes of CEQA. The CRHR includes resources listed in, or formally determined eligible for, some California State Landmarks and Points of Historical Interest. Properties of local significance that have been designated under a local preservation ordinance (local landmarks or landmark districts), or that have been identified in a local historical resources inventory may be eligible for listing in the CRHR and are presumed to be significant resources for purposes of CEQA unless a preponderance of evidence indicates otherwise.

Generally, a resource is considered by the lead agency to be historically significant if the resource meets the criteria for listing in the CRHR (California Public Resources Code Section 5024.1; 14 CCR 4852), consisting of the following:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or
2. It is associated with the lives of persons important to local, California, or national history; or
3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values; or
4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

A unique archaeological resource, as defined by California Public Resources Code Section 21083.2, may be considered significant under CEQA. If a significant archaeological resource is identified, defined mitigation would be appropriately implemented. As used in this section, "unique archaeological resource" means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Assembly Bill 52

CEQA was amended in 2014 through Assembly Bill (AB) 52, which created a new category of "tribal cultural resources" (TCRs) that must be considered under CEQA, and applies to all projects that file a Notice of Preparation or notice of negative declaration or mitigated negative declaration on or after July 1, 2015. AB 52 requires lead agencies to provide notice to and begin consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of a project if that tribe has requested, in writing, to be kept informed of projects by the lead agency prior to the determination whether a negative declaration, mitigated negative declaration, or environmental impact report will be prepared. If a tribe requests consultation within 30 days upon receipt of the notice, the lead agency must consult with the tribe. AB 52 also specifies mitigation measures that may be considered to avoid or minimize impacts on TCRs. Specifically, California Public Resources Code Section 21074 provides the following guidance:

(a) Tribal Cultural Resources are either of the following:

(1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

(A) Included or determined to be eligible for inclusion in the California Register of Cultural Resources.

(B) Included in a local register of cultural resources as defined in subdivision (k) of §5020.1.

(2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of §5024.1. In applying the criteria set forth in subdivision (c) of §5024.1 for the purposes of this

paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

(b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

(c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "nonunique archeological resource" as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

In the event that Native American human remains or related cultural material are encountered, Section 15064.5(e) of the state CEQA Guidelines (as incorporated from California Public Resources Code Section 5097.98) and Health and Safety Code Section 7050.5 define the subsequent protocol. In the event of the accidental discovery or recognition of any human remains, excavation or other disturbances shall be suspended on the site or any nearby area reasonably suspected to overlie adjacent human remains or related material. Protocol requires that a county-approved coroner be contacted to determine if the remains are of Native American origin. Should the coroner determine the remains to be Native American, the coroner must contact the Native American Heritage Commission (NAHC) within 24 hours. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating, with appropriate dignity, the human remains and any associated grave goods, as provided in California Public Resources Code Section 5097.98 (14 CCR 15064.5[e]).

California Native American Graves Protection and Repatriation Act

The California Native American Graves Protection and Repatriation Act (California Repatriation Act) (25 USC, Chapter 32), enacted in 2001, requires all state agencies and museums that receive state funding and that have possession or control over collections of human remains or cultural items, as defined, to complete an inventory and summary of these remains and items on or before January 1, 2003, with certain exceptions. The California Repatriation Act also provides a process for the identification and repatriation of these items to the appropriate tribes.

Senate Bill 18

Senate Bill (SB) 18, approved in 2004, amends the California Civil Code and the California Government Code, requiring cities and counties to contact and consult with California Native American tribes prior to adopting or amending any general plan or specific plan, or designating land as open space in order to preserve or mitigate impacts to specified Native American places, features and objects that are located within the city's or county's jurisdiction. SB 18 also requires cities and counties to hold in strict confidence any information about the specific identity, location, character, or use of these resources. In 2005, the California Governor's Office of Planning and Research published Tribal Consultation Guidelines to guide cities and counties on the process of engaging in consultation in accordance with SB 18 (OPR 2005). NAHC maintains a list of California Native American Tribes with whom cities and counties must consult pursuant to SB 18.

Local

City of Chula Vista Historic Designation Ordinance

The City of Chula Vista Historic Designation Ordinance (Title 21, Chula Vista Municipal Code (CVMC) Section 21.04.100) (City of Chula Vista 2011a) establishes general standards by which the Historical Significance of a Historical Resource is judged as eligible for designation on the Chula Vista Register:

1. A Resource is at least 45 years old; and
2. A Resource possesses historical Integrity defined under the CVMC §21.04.100 (discussed below) and the resource is determined to have historical significance by meeting at least one of the following criteria:
    1. It is associated with an event that is important to prehistory or history on a national, state, regional, or local level.
    2. It is associated with a person or persons that have made significant contributions to prehistory or history on a national, state, or local level.
    3. It embodies those distinctive characteristics of a style, type, period, or method of construction, or represents the work of a master or important creative individual, and/or possesses high artistic values.
    4. It is an outstanding example of a publicly owned Historic Landscape, that represents the work of a master landscape architect, horticulturalist, or landscape designer, or a publicly owned Historical Landscape that has potential to provide important information to the further study of landscape architecture or history.
    5. It has yielded or may be likely to yield information important in prehistory or the history of Chula Vista, the state, region, or nation.

Additionally, the designation of an exceptional historical resource may be considered only if:

1. The Historic Preservation Committee (HPC) considered and makes a recommendation to the Council; and
2. It has been demonstrated through expert technical analysis and verifiable evidence that all of the following findings of fact are made:
    a. The resource meets criteria and the findings of fact for designation found in subsections (A)(1) and (A)(2) of this section; and
    b. The resource is the best representative sample of its kind or the last of its kind; and
    c. The resource is an exceptionally important component of the City's history and loss or impairment of the resource would be detrimental to the City's heritage; and
3. Four-fifths vote of the Council vote to designate the resource as an exceptional historical resource.

City of Chula Vista Historic Preservation District

According to CVMC Section 21.06.010, the purpose of the Historic Preservation District is "To identify, designate, and preserve existing neighborhoods and Resources grouped either geographically or thematically as defined in

Chula Vista Municipal Code §21.03.063 and §21.03.131." National Register Bulletin No. 15 (NPS 1997) defines a district as possessing:

> … a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development … The identity of a district results from the interrelationship of its resources, which can convey a visual sense of the overall historic environment or be an arrangement of historically or functionally related properties.

According to CVMC Section 21.06.050, the eligibility criteria for Historic Preservation Districts are as follows:

- **Criterion 1:** The proposed Historic Preservation District is identified with an event, person, or group that contributed significantly to the City's prehistory or history.
- **Criterion 2:** Buildings, structures, objects, sites, signs or landscape elements within the proposed Historic Preservation District exemplify a particular architectural style, way of life, or period of development in the city.
- **Criterion 3:** Buildings or structures within the proposed Historic Preservation District are the best remaining examples of an architectural style or are verified as having been designed or constructed by a master architect, designer or builder, and retain integrity.

City of Chula Vista Historic Preservation Program

The City's Historic Preservation Program establishes a screening process for determining the historical significance of potential historical resources that are 45 years or older, that have not previously been surveyed or designated as historic, and that are proposed for alteration or demolition (City of Chula Vista 2011b). The Historic Preservation Program is intended to be a resource document that will educate and inform the user on the City's goals, policies, and procedures for preservation of historical resources and may be used for all preservation activities in the City. The Historic Preservation Program provides the following:

1. Provides user-friendly preservation guides and procedures for both city staff and members of the public.
2. Establish consistency between historic preservation goals and land-use policies by incorporating a historical significance review process and Certificate of Appropriateness permit process for historical resources into the building permit and discretionary project review process.
3. Adopt a more detailed Historic Preservation Ordinance that provides clear and easy to follow processes and procedures and complies with the requirements for Certified Local Government (CLG) status.
4. Attain and maintain CLG status.
5. Establish process and procedures for the identification and survey of historical resources.
6. Provide reference and technical assistance for preservation activities.
7. Utilize the State Historical Building Code.
8. Encourage the use of the Secretary of the Interior's Standards for Treatment of Historical Properties: Preservation, Rehabilitation, Restoration, and Reconstruction.

City of Chula Vista General Plan – Environmental Element

The Environmental Element of the City of Chula Vista General Plan (Chapter 9, Section 3.1.9) (City of Chula Vista 2005) specifically addresses potential impacts to cultural resources and outlines policies to mitigate negative impacts. The objective and policies protecting cultural and historical resources are outlined as follows:

Objective E-9: Protect Chula Vista's important cultural resources and support and encourage their accessibility to the public.

Policy E-9.1: Continue to assess and mitigate the potential impacts of private development and public facilities and infrastructure to cultural resources, in accordance with the California Environmental Quality Act.

Policy E-9.2: Support and encourage the accessibility of Chula Vista's important cultural resources to the public for educational; religious; cultural; scientific; and other purposes, including the establishment of museums and facilities accessible to the public, where such resources can be appropriately studied, exhibited, curated, etc.

Policy E-9.3: Discourage disruption, demolition, and other negative impacts to historic cultural resources.

5.4.1.2 Existing Cultural Setting

Prehistoric and Ethnohistoric Periods

Evidence for continued human habitation in the San Diego area spans the past 10,000 years. Various attempts to analyze the variability of archaeological assemblages over this broad period have resulted in the development of several cultural chronologies; some of these are based on geological time, most on temporal trends in archaeological assemblages, and others are interpretive reconstructions. Each of these reconstructions details similar trends in portfolio composition. This study uses a common set of general terms to describe chronological trends in assemblage formation: Early Man (pre 8500 BC), Paleo Indian (8500–6000 BC), Early Archaic (6000 BC–AD 0), and Late Prehistoric (AD 0–1769) (Appendix E).

History of San Diego

The history of San Diego can be divided into several distinct periods. The Exploration Period began in 1542 with the landing of Juan Rodriquez Cabrillo, and the Spanish Colonial Period began in 1769 with the colonization of the San Diego area. During this period, the Spanish established missions and forts to control the land and convert the native population. The Mexican Period began in 1821 after Mexico gained independence from Spain and ended with Mexican–American War of 1846–1848. The Anglo-American Period began with the invasion of California by US troops during the war, and the acquisition of strategic Pacific ports and land was one of the objectives of the war. The cattle boom of the early 1850s led to the decline of cattle ranching and the expansion of agriculture. The no fence act allowed for the expansion of unfenced farms crucial in an area where fencing materials were practically unavailable. After World War I, the growth of San Diego Bay as a home base for the Pacific Fleet and the aircraft industry in the 1920s led to the growth of the county as a whole and recreation areas were established in the mountain and desert areas (Appendix E).

History of Chula Vista

Chula Vista has a rich history dating back to 1769, when it was first occupied as grazing ground for San Diego mission herds. The land changed hands several times until it was purchased by Frank Kimball and his brothers in 1868. They developed the land into a lemon orchard, which became the center of a new community called Chula Vista. The city was officially incorporated in 1911 and was initially thriving on agriculture and salt production. During World War I, the Hercules Powder Company produced cordite by utilizing kelp harvested from Gunpowder Point, and this made it the largest kelp harvesting fleet and tank farm in the world.

The Great Depression had little effect on Chula Vista due to its participation in public works projects. Residents participated in public works administration projects for employment, which resulted in the construction of various buildings in the area, such as Memorial Bowl in Memorial Park. By the height of World War II, the Rohr Company employed 9,000 people, and this doubled the population of Chula Vista to over 19,000 lots of new development.

After World War II, the focus of Chula Vista shifted from agriculture to commercial development. The city saw an explosion in commercial development, and by 1960, there was no agriculture within its city limits. The Spanish Revival style bungalows and larger houses built in the area between 1920 and 1930, which included traditional Spanish and Moorish style details combined with mission revival elements, influenced commercial and civil buildings in the area, such as Chula City Hall (Appendix E).

Records Search and Previous Cultural Resource Investigations

As part of the Phase I Cultural Resources Survey (Appendix E), an archaeological records search was conducted at San Diego State University's South Coastal Information Center on May 11, 2022, to determine if there were previously recorded cultural resources on or near the subject property. The records search identified twenty previous investigations conducted within one mile of the project, nine of which are mapped as including portions of the project site. Most of these previous studies are either large linear studies or overviews that do not directly address the subject property.

The search of records revealed no previously documented archaeological sites within the project site. However, 15 recorded resources and 4 historic addresses were identified within 1 mile of the project site. These resources include 5 prehistoric lithic and shell litters; 1 prehistoric habitation site; 3 multicomponent sites containing prehistoric artifacts, shell scatters. and historic refuse; 2 historic railroad alignments; the historic San Diego Insectary; the historic location of the former Oyama property; the historic Hercules Powder Company Site; and a historic isolate (see Table 5.4-1). One of the historic rail lines, the Coronado Railroad grade (SDI-13,073H) is located between Planning Area A and Planning Area B-1/B-2, and one historic address including the former Rohr Aircraft Corporation facility, that was previously located on the project site (Appendix E).

Table 5.4-1. Archaeological Sites Recorded within 1 Mile of the Project Site

Site	Period	Description	Intersects/Bisects Project Site?
SDI-3, SDI-4958, SDI-5512/6025, SDI-5512A, and SDI-5512B	Prehistoric	Lithic and shell scatter	No
SDI-6025A	Prehistoric	Habitation site	No
SDI-6025B, SDI-6025C, and SDI-6025D	Prehistoric	Shell and artifact scatter and historic refuse	No

Table 5.4-1. Archaeological Sites Recorded within 1 Mile of the Project Site

Site	Period	Description	Intersects/Bisects Project Site?
SDI-13,073H	Historic	Historic Coronado Railroad grade	Yes
P-37-015946	Historic	Historic San Diego County Insectary	No
P-37-017445	Historic	Historic location of the former Oyama property	No
P-37-25680	Historic	Historic San Diego Railway and Arizona Railroad grade	No
P-33-030176	Historic	Historic Hercules Powder Company site	No
P-33-034102	Historic	Historic isolate	No

Source: Appendix E.

Historical Resources/Field Reconnaissance

Records relating to the ownership and developmental history of the project site were sought with a view to not only fulfill the requirements of the Phase I Cultural Resources Survey, but to identify any associated historical or architectural significance. Records located at the BFSA research library, those of the San Diego Assessor/Recorder/County Clerk, and those at the South Bay Historical Society and the San Diego History Center were consulted. Title records for the project site were also obtained.

On August 12, 2024, BFSA field archaeologist Crystal Maison conducted the field survey. Survey conditions were generally poor, with limited ground visibility across the property due to landscaping and development of the property. Access was also limited in some areas due to current construction activities associated with the cleanup and abatement order.

The project site has been disturbed by the previous development and subsequent clearing of the property. Soil stockpiles are present, as well as large trenches and large amounts of metal debris including piping and rods. All of the buildings associated with the former Rohr Aircraft Corporation were demolished in Planning Areas B-1 and B-2 as part of the RWQCB Cleanup and Abatement Order (CAO) in 2023. The building in Planning Area A was renovated, also part of the RWQCB CAO in 2023/2024.

The survey also resulted in the identification of one previously recorded railroad line (Site SDI-13,073H) identified immediately outside the project boundaries, between Planning areas B-1 and B-2 to the west and Planning Area A to the east.

Site SDI-13,073H (Coronado Belt Line Right-of-Way, Segment D)

The railroad line that bisects Planning Area A and B-1/B-2, was originally recorded as SDI-13,073H in 1993 by Donald Laylander. The railroad line, which was constructed in 1888, runs from southern San Diego to Glorieta Bay on Coronado Island. The portion of the alignment located between the Planning Areas was delineated as Segment D and consists of a 40-foot-wide, 2.8-mile segment of standard-gauge steel rails affixed to wooden ties by steel plates and spikes. The railroad line has previously been determined not eligible for the NRHP but is eligible and listed in the San Diego Register of Historical Resources (Appendix E).

NAHC Sacred Lands File Search and Outreach

BFSA requested an NAHC search of the Sacred Lands File on May 10, 2022, to check for the presence of sacred sites or locations of religious or ceremonial importance within the vicinity of the project, which returned negative results. The NAHC additionally provided a list of Native American tribes and individuals/organizations that might have knowledge of cultural resources in this area.

Following the NAHC response, letters were sent to the NAHC-listed tribal representatives with the intent of requesting information, opinions, or concerns relating to the proposed project impacts. These letters contained a brief description of the planned project, reference maps, and a summary of the NAHC Sacred Lands File search results.

Tribal Consultation

The proposed project is also subject to compliance with AB 52 (California Public Resources Code Section 21074) which requires consideration of impacts to TCRs as part of the CEQA process. AB 52 requires the City, as the lead agency responsible for CEQA compliance for the proposed project, to notify any groups (who have requested notification) of the proposed project who are traditionally or culturally affiliated with the geographic area of the project. Because AB 52 is a government-to-government process, all records of correspondence related to AB 52 notification and any subsequent consultation are on file with the City. On May 3, 2024, the City sent notification letters pursuant to AB 52 and SB 18[1] to tribes who are traditionally and culturally affiliated with the area of the project. To date, one response from the San Pasqual Tribe was received on May 30, 2024. In response to their request, the City provided the project-specific Cultural Resources Report. The City reached out to the Tribe on July 17, 2024 via e-mail to conduct a formal consultation, and no responses has been reciprocated. Consultation with Native American tribes is ongoing.

5.4.2 Thresholds of Significance

The significance criteria used to evaluate the project impacts to cultural resources and TCRs are based on Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.). According to Appendix G, a significant impact related to cultural resources would occur if the project would:

1. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5.
2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5.
3. Disturb any human remains, including those interred outside of dedicated cemeteries.

According to Appendix G, a significant impact related to TCRs would occur if the project would:

4. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

[1] SB 18 requires the City to contact and consult with California Native American tribes prior to adopting or amending any general plan or specific plan, or designating land as open space in order to preserve or mitigate impacts to specified Native American places, features and objects that are located within the city's or county's jurisdiction.

a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k).
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

5.4.3 Impacts

Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

Planning Areas B-1 and B-2 are vacant, and soil is being remediated, as of 2024, per the RWQCB CAO. The warehouse in Planning Area A was also renovated as part of the remediation process required by the RWQCB CAO.

The railroad line that bisects Planning Area A from Planning Areas B-1/B-2, which was originally recorded as SDI-13,073H in 1993 by Donald Laylander, and would not be impacted by the proposed project. The railroad line, which was constructed in 1888, runs from southern San Diego to Glorieta Bay on Coronado Island. The portion of the alignment located within the project area was delineated as Segment D and consists of a 40-foot-wide, 2.8-mile segment of standard-gauge steel rails affixed to wooden ties by steel plates and spikes. The railroad line has previously been determined not eligible for the NRHP but is eligible and listed in the San Diego Register of Historical Resources (Appendix E). However, it was determined not to be eligible for listing on the Chula Vista Register or CRHR. The portion of the rail line between Planning Areas A and B-1/B-2 would be left in place and the project would not impact the rail line. Impacts would be less than significant.

Nonetheless, the potential for intact cultural deposits to exist within native soils to the depths of proposed ground disturbance is unknown. In the event that unanticipated cultural resources are encountered during project implementation, an assessment and evaluation of the resource would be conducted, potentially resulting in the determination that the resource is historical in accordance with the definition outlined in CEQA Guidelines Section 15064.5. As a result, the project has a potential to impact and thus cause a substantial adverse change in the significance of a yet unknown historical resource. Impacts would be **potentially significant** and mitigation would be required.

Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

As detailed in Appendix E, an archaeological record search was conducted at San Diego State University's South Coastal Information Center to determine if there were previously recorded archeological resources on or near the subject property. In addition, background research, including a review of a geotechnical report; and an archaeological pedestrian survey were conducted as part of Appendix E to address potential impacts to archaeological resources. The results of the records search did not identify the presence of any previously recorded archaeological sites within the project site. However, 15 recorded resources and 4 historic addresses were identified within 1 mile of the project site (Table 5.4-1).

Given the presence of resources in proximity to the project site, there is potential that buried archeological deposits are present within the boundaries of the project site, which may have been masked by current conditions at the site. Therefore, it is recommended that implementation of a cultural resources monitoring program be conducted

by an archaeologist and Native American representative during any additional grading activities. Prior to implementation of mitigation, impacts would be **potentially significant**.

Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

No evidence of human remains, including those interred outside of formal cemeteries, was discovered during the records search, literature review, field survey, or site testing and evaluation. Further, the site has never been used as a formal cemetery and it is not anticipated that the project would result in the disturbance of human remains. However, in the unlikely event that excavation activities during construction inadvertently uncover buried human remains, they would require handling in accordance with existing regulations. In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the County Coroner shall be immediately notified of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within 2 working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, the County Coroner shall notify NAHC in Sacramento within 24 hours. In accordance with California Public Resources Code Section 5097.98, NAHC must immediately notify those persons it believes to be the most likely descendants from the deceased Native American. The most likely descendants shall complete their inspection within 48 hours of being granted access to the site. The most likely descendants would then determine, in consultation with the property owner, disposition of the human remains. Prior to mitigation, impacts would be **potentially significant**.

Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

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

No previously recorded TCRs were listed in the CRHR or a local register were identified within the proposed project area of potential effects. The railroad line has previously been determined not eligible for the NRHP but is eligible and listed in the San Diego Register of Historical Resources (Appendix E). However, it was determined not to be eligible for listing on the Chula Vista Register or CRHR. The portion of the rail line between Planning Areas A and B-1/B-2 would be left in place and the proposed project would not impact the rail line. Therefore, no resources listed or eligible for listing in the CRHR or in a local register would be impacted by the proposed project.

In the event that unanticipated resources are encountered during project implementation, an assessment and evaluation of the resource would be conducted, potentially resulting in the determination that the resource is historical in accordance with the definition outlined in CEQA Guidelines Section 15064.5. As a result, the project has the potential to cause a substantial adverse change in the significance of a yet unknown historical resource. Therefore, impacts would be **potentially significant** and mitigation would be required.

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

AB 52 requires that lead agencies evaluate a project's potential to impact tribal cultural resources. Such resources include "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources." AB 52 also gives lead agencies the discretion to determine, supported by substantial evidence, whether a resource qualifies as a tribal cultural resource. Also, per AB 52 (specifically, California Public Resources Code Section 21080.3.1), Native American consultation is required upon request by a California Native American tribe that has previously requested that the City provide it with notice of such projects.

On May 3, 2024, the City sent notification letters pursuant to AB 52 and SB 18 to tribes who are traditionally and culturally affiliated with the area of the project. To date, one response from the San Pasqual Tribe was received on May 30, 2024. In response to their request, the City provided the project-specific Cultural Resources Report. The City reached out to the Tribe on July 17, 2024 via e-mail to conduct a formal consultation, and no responses has been reciprocated. Consultation with Native American tribes is ongoing.

As discussed under Threshold No. 3, it is not anticipated that the project would result in the disturbance of human remains. However, in the unlikely event that excavation activities during construction inadvertently uncover buried human remains, impacts could occur. Therefore, there is still potential for unknown subsurface TCRs to be present on site. Proposed grading activities have the potential to disturb unknown subsurface TCRs. Therefore, impacts would be **potentially significant** and mitigation (**MM-CUL-1**) is required.

5.4.4 Level of Significance prior to Mitigation

Prior to mitigation, the proposed project would have significant impacts associated with historical resources, archaeological resources, human remains, and TCRs.

5.4.5 Mitigation Measures

The following mitigation measures are recommended to reduce potentially significant impacts to unknown subsurface historical or archaeological resources, human remains, and TCRs within the proposed project site:

MM-CUL-1 Cultural Resources Avoidance and Curation Measures.

A. Prior to beginning construction activities, the project archaeologist and Native American representative shall attend any pertinent preconstruction meetings with the construction manager and/or grading contractor in order to provide recommendations and answer questions relating to the archaeological monitoring program. The project archaeologist shall be familiar with the cultural inventory conducted for the current project and shall be prepared to introduce any pertinent information concerning expectations and probabilities of discovery during ground-disturbing activities. Prior to the initiation of construction, the cultural consultant shall acquire all evaluation information and the draft evaluation report, if a report was prepared.

B. Both an archaeological monitor familiar with local resources and a Native American monitor shall be present full time during the initial disturbance of soil with potential to contain cultural

deposits. All areas of initial project-related subsurface disturbance shall be assumed to have the potential to contain cultural deposits. Monitoring of initial ground disturbance shall not exceed a depth of 5 feet (1.5 meters) unless cultural resources are identified or if, through direct inspection of subsurface exposures by the project Archaeologist, an area is observed to have the potential to support the presence of archaeological deposits at greater depths. Cultural resources monitoring may be reduced from initial full-time monitoring to periodic spot checks, or discontinued if appropriate, once the project archaeologist determines that there is little or no risk of encountering cultural material.

C. Daily archaeological and Native American monitoring logs shall be prepared. Logs shall include monitor names and affiliations, a description of general activities observed, cultural discoveries, as well as comments or concerns as applicable.

D. In the event of an archaeological discovery, and when requested by the archaeological monitor or Native American monitor, the resident contractor will divert, redirect, or temporarily halt ground disturbing activities in the area of discovery or impacts to allow for preliminary inspection of potentially significant archaeological resources or impacts. The significance of the discovered resources or impacts shall be determined by the archaeologist, in consultation with the City of Chula Vista (City). For significant cultural resources, a Research Design and Data Recovery Program shall be prepared and carried out to mitigate impacts before grading activities in the area of discovery shall be allowed to resume.

E. The project archaeologist shall be responsible for ensuring that all cultural materials collected will be cleaned, catalogued, and curated permanently with an appropriate institution; that a letter of acceptance from the curation institution has been submitted to the City; that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material will be identified as to species; and that specialty studies are completed, as appropriate. The project archaeologist shall make a good-faith effort to ensure that all archaeological material collected through previous work is appropriately curated with any material recovered through construction monitoring.

F. If human remains are discovered, work shall halt in that area and procedures set forth in the California Public Resources Code (Section 5097.98) and State Health and Safety Code (Section 7050.5) shall be followed by the archaeological monitor after notification to the County Coroner by the project Archaeologist. If Native American remains are present, the County Coroner shall contact the Native American Heritage Commission to designate a Most Likely Descendant, who shall arrange for the dignified disposition and treatment of the remains.

G. Within 3 months following the completion of monitoring, two copies of a monitoring results report (even if negative) and/or evaluation report, if applicable, that describes the results, analysis, and conclusions of the archaeological monitoring program (with appropriate graphics) shall be submitted to City.

H. For significant archaeological resources encountered during monitoring, the Research Design and Data Recovery Program shall be included as part of the final evaluation monitoring report. Two copies of the final monitoring report for significant archaeological resources, if required, shall be submitted to the City. This final monitoring report should also incorporate a summary of the evaluation results and analyses previously conducted within the project area.

I. The archaeologist shall be responsible for recording (on the appropriate CA DPR 523 Series forms) any significant or potentially significant resources encountered during the archaeological monitoring program in accordance with Section 106 and the City's Cultural

Resources Guidelines, and submittal of such forms to the South Coastal Information Center at San Diego State University with the final monitoring results report.

5.4.6 Level of Significance after Mitigation

Implementation of **MM-CUL-1** would reduce potentially significant impacts to archeological resources, human remains, and TCRs to less than significant.

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5.5 Energy

This section describes the existing energy conditions of the project site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed project. The discussion in this section is based on the Air Quality and Greenhouse Gas Emissions Technical Report prepared for the project by Dudek in August 2024. The complete report is contained in Appendix C of this EIR.

5.5.1 Existing Conditions

5.5.1.1 Regulatory Framework

Federal

Federal Energy Policy and Conservation Act and CAFE Standards

In 1975, Congress enacted the federal Energy Policy and Conservation Act, which established the first fuel economy standards, known as the Corporate Average Fuel Economy (CAFE) standards, for on-road motor vehicles in the United States. Pursuant to the act, the National Highway Traffic Safety Administration (NHTSA) is responsible for establishing additional vehicle standards. In 2012, new CAFE standards for passenger cars and light trucks were approved for model years 2017 through 2021 (77 FR 62624–63200). Fuel economy is determined based on each manufacturer's average fuel economy for the fleet of vehicles available for sale in the United States.

Energy Independence and Security Act of 2007

On December 19, 2007, the Energy Independence and Security Act of 2007 (EISA) was signed into law. In addition to setting increased CAFE standards for motor vehicles, the EISA facilitates the reduction of national GHG emissions by requiring the following:

- Increasing the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) that requires fuel producers to use at least 36 billion gallons of biofuel in 2022.
- Prescribing or revising standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.
- Requiring approximately 25% greater efficiency for light bulbs by phasing out incandescent light bulbs between 2012 and 2014; requiring approximately 200% greater efficiency for light bulbs, or similar energy savings, by 2020.
- While superseded by the U.S. Environmental Protection Agency (EPA) and NHTSA actions described previously, establishing miles per gallon targets for cars and light trucks and directing the NHTSA to establish a fuel economy program for medium-and heavy-duty trucks and create a separate fuel economy standard for trucks.

This federal legislation requires ever-increasing levels of renewable fuels (the RFS) to replace petroleum (EPA 2023). EPA is responsible for developing and implementing regulations to ensure that transportation fuel sold in the United States contains at least a minimum volume of renewable fuel.

The RFS program was created under the Energy Policy Act and established the first renewable fuel volume mandate in the United States. As required under the Energy Policy Act, the original RFS program required 7.5 billion gallons of renewable fuel to be blended into gasoline by 2012. Under the EISA, the RFS program was expanded in several ways that laid the foundation for achieving significant reductions in GHG emissions from the use of renewable fuels, reducing imported petroleum, and encouraging the development and expansion of the renewable fuels sector in the United States. The updated program is referred to as "RFS2" and includes the following:

- The EISA expanded the RFS program to include diesel, in addition to gasoline.
- The EISA increased the volume of renewable fuel required to be blended into transportation fuel from 9 billion gallons in 2008 to 36 billion gallons by 2022.
- The EISA established new categories of renewable fuel and set separate volume requirements for each one.
- The EISA required EPA to apply lifecycle GHG performance threshold standards to ensure that each category of renewable fuel emits fewer GHGs than the petroleum fuel it replaces.

Additional provisions of the EISA address energy savings in government and public institutions, research for alternative energy, additional research in carbon capture, international energy programs, and the creation of green (environmentally beneficial) jobs.

Intermodal Surface Transportation Efficiency Act of 1991

The Intermodal Surface Transportation Efficiency Act (ISTEA) of 1991 promoted the development of intermodal transportation systems to maximize mobility and address national and local interests in air quality and energy. ISTEA contained factors for metropolitan planning organizations to address in developing transportation plans and programs, including some energy-related factors. To meet the new ISTEA requirements, metropolitan planning organizations adopted policies defining the social, economic, energy, and environmental values guiding transportation decisions.

Transportation Equity Act for the 21st Century

The Transportation Equity Act for the 21st Century was signed into law in 1998 and builds on the initiatives established in the ISTEA legislation (previously discussed). The Transportation Equity Act authorizes highway, highway safety, transit, and other efficient surface transportation programs. The act continues the program structure established for highways and transit under ISTEA, such as flexibility in the use of funds, emphasis on measures to improve the environment, and focus on a strong planning process as the foundation of transportation decisions. The Transportation Equity Act also provides for investment in research and its application to maximize the performance of the transportation system through, for example, deployment of intelligent transportation systems to help improve operations and management of transportation systems and vehicle safety.

State

Warren-Alquist Act

The California Legislature passed the Warren-Alquist Act in 1974. The Warren-Alquist Act created the California Energy Commission (CEC). The legislation also incorporated the following three key provisions designed to address the demand side of the energy equation:

- It directed the CEC to formulate and adopt the nation's first energy conservation standards for both buildings constructed and appliances sold in California.

- The act removed the responsibility of electricity demand forecasting from the utilities, which had a financial interest in high demand projections, and transferred it to a more impartial CEC.
- The CEC was directed to embark on an ambitious research and development program, with a particular focus on fostering what were characterized as non-conventional energy sources.

State of California Energy Action Plan

The CEC and the California Public Utilities Commission (CPUC) approved the first State of California Energy Action Plan in 2003. The Energy Action Plan established shared goals and specific actions to support that adequate, reliable, and reasonably priced electrical power and natural gas supplies are provided, and identified policies, strategies, and actions that are cost effective and environmentally sound for California's consumers and taxpayers. In 2005, CEC and CPUC adopted a second Energy Action Plan to reflect various policy changes and actions of the preceding 2 years.

At the beginning of 2008, CEC and CPUC determined that it was not necessary or productive to prepare a new Energy Action Plan. This determination was based, in part, on a finding that the state's energy policies have been significantly influenced by the passage of Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006 (discussed below). Rather than produce a new Energy Action Plan, CEC and CPUC prepared an update that examines the state's ongoing actions in the context of global climate change.

Assembly Bill 32 and Senate Bill 32

In 2006, the State Legislature enacted AB 32, the California Global Warming Solutions Act of 2006. AB 32 requires California to reduce its GHG emissions to 1990 levels by 2020. In 2016, the Legislature enacted Senate Bill (SB) 32, which extended the horizon year of the state's codified GHG reduction planning targets from 2020 to 2030, requiring California to reduce its GHG emissions to 40% below 1990 levels by 2030. In accordance with AB 32 and SB 32, the California Air Resources Board (CARB) prepares scoping plans to guide the development of statewide policies and regulations for the reduction of GHG emissions. Many of the policy and regulatory concepts identified in the scoping plans focused on increasing energy efficiencies, using renewable resources, and reducing the consumption of petroleum-based fuels (such as gasoline and diesel). As such, the state's GHG emissions reduction planning framework creates co-benefits for energy-related resources.

Senate Bills 1078 (2002), 107 (2006), X1-2 (2011), 350 (2015), 100 (2018), SB 1020 (2022)

Senate Bill (SB) 1078 established the California Renewable Portfolio Standards (RPS) Program and required that a retail seller of electricity purchase a specified minimum percentage of electricity generated by eligible renewable energy resources as defined in any given year, culminating in a 20% standard by December 31, 2017. These retail sellers include electrical corporations, community choice aggregators, and electric service providers. The bill relatedly required the CEC to certify eligible renewable energy resources, design and implement an accounting system to verify compliance with the RPS by retail sellers, and allocate and award supplemental energy payments to cover above-market costs of renewable energy.

SB 107 (2006) accelerated the RPS established by SB 1078 by requiring that 20% of electricity retail sales be served by renewable energy resources by 2010 (not 2017). Additionally, SB X1-2 (2011) requires all California utilities to generate 33% of their electricity from eligible renewable energy resources by 2020. Specifically, SB X1-2 sets a three-stage compliance period: by December 31, 2013, 20% had to come from renewables; by December 31, 2016, 25% had to come from renewables; and by December 31, 2020, 33% will come from renewables.

SB 350 (2015) expanded the RPS because it requires retail seller and publicly owned utilities to procure 50% of their electricity from eligible renewable energy resources by 2030, with interim goals of 40% by 2024 and 45% by 2027.

SB 100 (2018) accelerated and expanded the standards set forth in SB 350 by establishing that 44% of the total electricity sold to retail customers in California per year by December 31, 2024, 52% by December 31, 2027, and 60% by December 31, 2030 be secured from qualifying renewable energy sources. SB 100 also states that it is the policy of the state that eligible renewable energy resources and zero-carbon resources supply 100% of the retail sales of electricity to California by 2045. This bill requires that the achievement of 100% zero-carbon electricity resources does not increase the carbon emissions elsewhere in the western grid and that the achievement not be achieved through resource shuffling.

SB 1020 (2022) revises the standards from SB 100, requiring the following percentage of retail sales of electricity to California end-use customers come from eligible renewable energy resources and zero-carbon resources:

- 90% by December 31, 2035
- 95% by December 31, 2040
- 100% by December 31, 2045

Consequently, utility energy generation from non-renewable resources is expected to be reduced based on implementation of the RPS requirements described above.

California Building Standards

The California Building Standards Code was established in 1978 and serves to enhance and regulate California's building standards. While not initially promulgated to reduce GHG emissions, Part 6 of Title 24 specifically established Building Energy Efficiency Standards that are designed to ensure that new and existing buildings in California achieve energy efficiency and preserve outdoor and indoor environmental quality. These energy efficiency standards are reviewed every 3 years by the Building Standards Commission and the California Energy Commission (CEC) and revised if necessary (California Public Resources Code Section 25402[b][1]). The regulations receive input from members of industry, as well as the public, to "reduce the wasteful, uneconomic, inefficient, or unnecessary consumption of energy" (California Public Resources Code Section 25402). These regulations are carefully scrutinized and analyzed for technological and economic feasibility (California Public Resources Code Section 25402[d]) and cost effectiveness (California Public Resources Code Section 25402[b][2–3]). As a result, these standards save energy, increase electricity supply reliability, increase indoor comfort, avoid the need to construct new power plants, and help preserve the environment. The current Title 24 standards are the 2022 Title 24 building energy efficiency standards, which became effective January 1, 2023.

In addition to CEC's efforts, in 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11 of Title 24), which is commonly referred to as California's Green Building Standards (CALGreen), establishes minimum mandatory standards and voluntary standards pertaining to the planning and design of sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and interior air quality.

Integrated Energy Policy Report

The CEC is responsible for preparing integrated energy policy reports that identify emerging trends related to energy supply, demand, and conservation; public health and safety; and maintenance of a healthy economy. The

CEC's 2021 Integrated Energy Policy Report discusses the state's policy goals of decarbonizing buildings, ensuring energy reliability, decarbonizing the state's gas system, the state's energy demand forecast, and quantifying the benefits of the clean transportation program (CEC 2022). SB 100 calls for California's electricity system to become 100% zero-carbon by 2045. CEC, CPUC, and CARB are working together to identify pathways to deeply decarbonize the state's electricity system in response to SB 100. The aim is to leverage California's clean electricity system to decarbonize, or remove carbon from, other portions of the state's energy system. Over time, these policies and trends would serve to beneficially reduce a project's GHG emissions profile and energy consumption as they are implemented.

State Vehicle Standards

In response to the transportation sector accounting for more than half of California's CO_2 emissions, AB 1493 was enacted in 2002. AB 1493 required CARB to set GHG emissions standards for passenger vehicles, light-duty trucks, and other vehicles determined by the state board to be vehicles whose primary use is noncommercial personal transportation in the state. The bill required that CARB set GHG emissions standards for motor vehicles manufactured in 2009 and all subsequent model years. The 2009–2012 standards resulted in a reduction in approximately 22% of GHG emissions compared to emissions from the 2002 fleet, and the 2013–2016 standards resulted in a reduction of approximately 30%.

In 2012, CARB approved a new emissions-control program for model years 2017 through 2025. The program combines the control of smog, soot, and global-warming gases with requirements for greater numbers of zero-emissions vehicles into a single package of standards called Advanced Clean Cars, detailed below. By 2025, when the rules would be fully implemented, new automobiles would emit 34% fewer global-warming gases and 75% fewer smog-forming emissions.

Although the focus of the state's vehicle standards is on the reduction of air pollutants and GHG emissions, one co-benefit of implementation of these standards is a reduced demand for petroleum-based fuels.

Advanced Clean Car Program

The Advanced Clean Cars (ACC) I program (January 2012) is an emissions-control program for model years 2015 through 2025. The program combines the control of smog- and soot-causing pollutants and GHG emissions into a single coordinated package of regulations: the Low-Emission Vehicle (LEV) regulation for criteria air pollutant and GHG emissions and a technology forcing regulation for zero-emission vehicles (ZEV) that contributes to both types of emission reductions. The package includes elements to reduce smog-forming pollution, reduce GHG emissions, promote clean cars, and provide the fuels for clean cars. To improve air quality, CARB has implemented new emission standards to reduce smog-forming emissions beginning with 2015 model year vehicles. It is estimated that in 2025 cars will emit 75 percent less smog-forming pollution than the average new car sold in 2015. The ZEV program will act as the focused technology of the ACC I program by requiring manufacturers to produce increasing numbers of ZEVs and plug-in hybrid EVs in the 2018 to 2025 model years.

The ACC II program is currently in development to establish the next set of LEV and ZEV requirements for model years after 2025 to contribute to meeting federal ambient air quality ozone standards and California's carbon neutrality standards. The main objectives of ACC II are:

1. Maximize criteria and GHG emission reductions through increased stringency and real-world reductions.
2. Accelerate the transition to ZEVs through both increased stringency of requirements and associated actions to support wide-scale adoption and use.

An ACC II rulemaking package, which considers technological feasibility, environmental impacts, equity, economic impacts, and consumer impacts, was approved by the Office of Administrative Law on November 30, 2022. This requires that, by 2035, all new passenger cars, trucks, and sports utility vehicles (SUVs) will be zero emissions by 2035. However, as detailed previously, EPA and NHTSA published the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule, which revokes California's authority to set its own GHG emissions standards and set ZEV mandates in California. Since California and 22 other states, as well as the District of Columbia and four cities, filed suit against the EPA and a petition for reconsideration of the SAFE Rule, the ACC II rulemaking's course may vary depending on the results of this ongoing litigation.

Advanced Clean Trucks Program

The purpose of the ACT Regulation (June 2020) is to accelerate the market for zero-emission vehicles in the medium- and heavy-duty truck sector and to reduce emissions NO_x, fine particulate matter, TACs, GHGs, and other criteria pollutants generated from on-road mobile sources (CARB 2021). Requiring medium- and heavy-duty vehicles to transition to zero-emissions technology will reduce health risks to people living in and visiting California and is needed to help California meet established near- and long-term air quality and climate mitigation targets. The regulation has two components including (1) a manufacturer sales requirement and (2) a reporting requirement:

1. Zero-emission truck sales: Manufacturers who certify Class 2b-8 chassis or complete vehicles with combustion engines will be required to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. By 2035, zero-emission truck/chassis sales would need to be 55% of Class 2b – 3 truck sales, 75% of Class 4 – 8 straight truck sales, and 40% of truck tractor sales.
2. Company and fleet reporting: Large employers including retailers, manufacturers, brokers and others will be required to report information about shipments and shuttle services. Fleet owners, with 50 or more trucks, will be required to report about their existing fleet operations. This information will help identify future strategies to ensure that fleets purchase available zero-emission trucks and place them in service where suitable to meet their needs.

Local

San Diego Gas & Electric (SDG&E) Individual Integrated Resource Plan

SDG&E's Conforming Portfolio identifies a need for approximately 700 gigawatt-hours of incremental renewable power in addition to the assumed increases in energy efficiency and behind-the-meter solar, to meet the 2030 planning target (approximately 4% of the total energy in the portfolio) (SDG&E 2021). SDG&E's Conforming Portfolio demonstrates that the utility has reduced its GHG emissions in the early years of the planning period, reflecting its current position in relation to its RPS targets—in 2018, approximately 45% of its energy mix came from delivering renewable resources (compared to an RPS requirement of 29%), it has aggressively adopted energy storage, and does not use coal resources. SDG&E is fully compliant with RPS and long-term contracting requirements. SDG&E continues its efforts to meet resource-specific renewable procurement mandates, as required, but does not expect to procure additional resources for RPS compliance purposes until after 2030.City of Chula Vista Climate Action Plan

Since 2000, Chula Vista has been implementing a Climate Action Plan (CAP) to address climate change issues and its impacts on the City. The City's Climate Action Plan is a group of documents including various GHG emission inventories, the original Carbon Dioxide Reduction Plan (2000), Climate Mitigation Plan (2008), new Climate Adaptation Plan (2011), and Municipal Action (2014). The City's Increased Energy Efficiency Ordinance, Green

Building Standards, and Solar Ready Ordinances are products of the Climate Action Plan. Actions and goals of the 2017 CAP relate to energy and water efficient buildings, smart growth and clean transit, zero waste, increased local energy and water resources, leading by example, and community resilience (City of Chula Vista 2017).

Chula Vista Climate Adaptation Strategies – Implementation Plans

The Climate Adaptation Strategies – Implementation Plans document developed by the Climate Change Working Group includes 11 strategies to adapt Chula Vista to the potential impacts of global climate change, including energy supply. The strategies to reduce energy demand include cool paving, shade trees, and cool roofs. For each strategy, the plans outline specific implementation components, critical steps, costs, and timelines. To limit the necessary staffing and funding required to implement the strategies, the plans were also designed to build upon existing municipal efforts rather than create new, stand-alone policies or programs. Initial implementation of all 11 strategies is intended to be phased in over a 3-year period from plan adoption (City of Chula Vista 2011).

City of Chula Vista Green Building Standards

The City of Chula Vista amended Municipal Code Ordinance 15.12 pertaining to green building practices to include residential and non-residential remodels and additions. The Code contains Residential Mandatory Measures and Non-Residential Mandatory Measures and also provides Voluntary Measures that can be used by developers to improve energy efficiency and reduce environmental impacts through design and construction.

San Diego Regional Energy Efficiency Plan/City of Chula Vista Energy Strategy and Action Plan

The San Diego Regional Energy Strategy serves as the energy policy blueprint for the region through 2050. The Regional Energy Strategy provides long-term goals in eleven topic areas: energy efficiency, renewable energy, distributed generation, transportation fuels, land use and transportation planning, border energy issues, and the green economy (SANDAG 2014).

The City has adopted an energy plan to address long-term energy issues and to protect its residents from unreliable energy supply and volatile prices. The plan, called the Chula Vista Energy Strategy and Action Plan, 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 (City of Chula Vista 2001).

City of Chula Vista Solar Ready Ordinances

CVMC, Section 15.28.015, solar water heater pre-plumbing, and Section 15.24.065, photovoltaic pre-wiring requirements, are referred to as the Solar Ready ordinances. Section 15.28.015 requires all new residential units to include plumbing specifically designed to allow the later installation of a system which utilizes solar energy as the primary means of heating domestic potable water. Section 15.24.065 requires all new residential units to include electrical conduit specifically designed to allow the later installation of a photovoltaic system which utilizes solar energy as a means to provide electricity.

City of Chula Vista General Plan

The City of Chula Vista General Plan recognizes that to ensure adequate and reliable energy service, efficient energy efforts throughout the City and transitioning to non-fossil fuel alternatives will help to extend limited supplies,

reduce the need for expensive new regional power generators and transmission lines, and contribute to Chula Vista's economic sustainability and regional competitiveness. The General Plan includes objectives in the Public Facilities and Services Element to ensure adequate energy supplies throughout Chula Vista (Objective PFS 22) and in the Environmental Element to promote conservation through the efficient use of energy and through the development of local, non-fossil fuel-based renewable sources of energy (Objective E 7) (City of Chula Vista 2005).

5.5.1.2 Existing Setting

Electricity

According to the U.S. Energy Information Administration (EIA), California used approximately 247,249,865 megawatt-hours of electricity in 2021 (EIA 2022). Electricity usage in California for different land uses varies substantially by the types of uses in a building, type of construction materials used in a building, and the efficiency of all electricity-consuming devices within a building. Due to the state's energy efficiency building standards and efficiency and conservation programs, California's electricity use per capita in the residential and commercial sector is lower than any other state except Hawaii (EIA 2023a).

San Diego Gas & Electric (SDG&E) provides electricity to the Project. SDG&E supplies power to 3.6 million people, through 1.4 million electric meters, and across a 4,100 square-mile service area that includes San Diego County and southern Orange County (SDG&E 2021). According to the California Energy Commission, demand forecasts anticipate that approximately 22.7 billion kWh of electricity will be used in SDG&E's service area in 2024 (CEC 2023a).

SDG&E receives electric power from a variety of sources. According to the 2022 SDG&E Power Content Label, eligible renewable energy accounts for 44.5% of SDG&E's overall energy resources, with biomass and biowaste at 2.9%, solar at 28.0%, wind power at 13.9%, unspecified power[1] at 0.8%, and natural gas at 54.4% (CEC 2023b). Within San Diego County, annual electricity use in 2022 was approximately 20.2 billion kWh per year (CEC 2023c).

Natural Gas

Natural gas is a combustible mixture of hydrocarbon compounds (primarily methane) used as a fuel source. The majority of the natural gas consumed in California is obtained from sources located outside the state and delivered through high-pressure transmission pipelines. Natural gas provides almost one-third of the state's total energy requirements and is used in electricity generation, space heating, cooking, water heating, industrial processes, and as a transportation fuel. Natural gas is measured in terms of cubic feet.

According to the EIA, California used approximately 2,092,612 million cubic feet of natural gas in 2021 (EIA 2023b). The majority of California's natural gas customers are residential and small commercial customers (core customers). These customers account for approximately 35% of the natural gas delivered by California utilities (CPUC 2021). Large consumers, such as electric generators and industrial customers (noncore customers), account for approximately 65% of the natural gas delivered by California utilities (CPUC 2021). CPUC regulates California natural gas rates and natural gas services, including in-state transportation over transmission and distribution pipeline systems, storage, procurement, metering, and billing. Most of the natural gas used in California comes from out-of-state natural gas basins. Biogas (e.g., from wastewater treatment facilities or dairy farms) is just

[1] Unspecified power is electricity that has been purchased through open market transactions and is not traceable to a specific generation source.

beginning to be delivered into the gas utility pipeline systems; however, the State has adopted regulations requiring its development to reduce statewide emissions of methane by 40% below 2013 levels by 2030 (CPUC 2022).

SDG&E provides San Diego County and southern Orange County with natural gas service, encompassing approximately 4,100 square miles. Within San Diego County, gas consumption in 2022 was approximately 522 million therms, with 281 million therms for residential use and 241 million therms for non-residential use (CEC 2023b).

Petroleum

According to the EIA, California used approximately 605 million barrels of petroleum in 2021, with the majority (511 million barrels) used for the transportation sector (EIA 2023c). There are 42 U.S. gallons in a barrel, so this equates to a total daily use of approximately 25.4 billion gallons of petroleum among all sectors and 21.46 billion gallons for the transportation sector. Petroleum usage in California includes petroleum products such as motor gasoline, distillate fuel, liquefied petroleum gases, and jet fuel. At the federal and state levels, various policies, rules, and regulations have been enacted to improve vehicle fuel efficiency, promote the development and use of alternative fuels, reduce transportation - source air pollutants and greenhouse gas (GHG) emissions, and reduce vehicle miles traveled (VMT). Section 5.5.1.1 Regulatory Framework discusses in more detail both federal and state regulations that would help increase fuel efficiency of motor vehicles and reduce GHG emissions. Market forces have driven the price of petroleum products steadily upward over time, and technological advances have made use of other energy resources or alternative transportation modes increasingly feasible.

5.5.2 Thresholds of Significance

The significance criteria used to evaluate the project impacts to energy are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to energy would occur if the project would:

1. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.
2. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Approach and Methodology

CalEEMod Version 2022.1 (CAPCOA 2022) was used to estimate the potential project energy consumption during construction and operation. All details specific to construction and operation are discussed in Section 5.2, Air Quality, specifically in Approach and Methodology (Construction Emissions and Operational Emissions), and are also applicable for the estimation of construction-related and operations-related energy consumption.

5.5.3 Impacts

Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Construction and operational energy use are based on the approach and methodology discussed in Appendix C Air Quality and Greenhouse Gas Emissions Technical Report, specifically Section 2.3.3 and the Approach and Methodology discussed in Section 5.2 Air Quality of this EIR.

Construction Energy Use

Electricity Usage

Temporary electric power for as-necessary lighting and electronic equipment, such as computers inside temporary construction trailers, would be provided by SDG&E. The electricity used for such activities would be temporary, would be substantially less than that required for project operation, and would therefore have a negligible contribution to the project's overall energy consumption. Impacts would be **less than significant**.

Natural Gas Usage

Natural gas is not anticipated to be required during construction of the project. Fuels used for construction would primarily consist of diesel and gasoline, which are discussed under the subsection "Petroleum Usage," below. Any minor amounts of natural gas that may be consumed as a result of project construction would be temporary and negligible, and would not have an adverse effect; therefore, impacts would be **less than significant.**

Petroleum Usage

Petroleum would be consumed throughout construction of the project. Fuel consumed by construction equipment would be the primary energy resource expended over the course of construction, and VMT associated with the transportation of construction materials and construction worker commutes would also result in petroleum consumption. Heavy-duty construction equipment associated with construction activities and haul trucks involved in relocating dirt around the project site are assumed to use diesel fuel. Construction workers would travel to and from the project site throughout the duration of construction. It is assumed that construction workers would travel to and from the project site in gasoline-powered vehicles.

Heavy-duty construction equipment of various types would be used during project construction. CalEEMod was used to estimate construction equipment usage; results are included in Appendix C. Fuel consumption from construction equipment was estimated by converting the total CO_2 emissions from each construction phase to gallons using conversion factors for CO_2 to gallons of gasoline or diesel. The conversion factor for gasoline is 8.78 kilograms per metric ton of CO_2 per gallon, and the conversion factor for diesel is 10.21 kilograms per metric ton of CO_2 per gallon (The Climate Registry 2023). The estimated diesel fuel usage from construction equipment, and vendor trucks, as well as estimated gasoline fuel usage from worker vehicles is shown in Table 5.5-1.

Table 5.5-1. Construction Petroleum Demand

Project	Off-road Equipment (diesel)	Vendor Trucks (diesel)	Haul Trucks (Diesel)	Onsite Trucks (Diesel)	Worker Vehicles (gasoline)
	Gallons				
2024	22,294	3,791	20,524	51	4,527
2025	27,807	22,615	0	0	24,066
2026	17,068	11,754	0	0	13,248
2028	12,077	14,532	0	0	15,916
2029	11,030	14,975	0	0	16,571
Total	**90,275**	**67,668**	**20,524**	**51**	**74,327**

Source: Appendix C.

In summary, construction of the project is anticipated to consume 74,327 gallons of gasoline and 178,518 gallons of diesel. Project construction would represent a "single-event" petroleum demand and would not require on-going or permanent commitment of petroleum resources for this purpose. There are no unusual project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities, or equipment that would not conform to current emissions standards (and related fuel efficiencies). In addition, MM AQ-2 would require the provision of electrical infrastructure and use of electric construction equipment, which would further improve fuel efficiencies. Equipment employed in construction of the project would therefore not result in inefficient, wasteful, or unnecessary consumption of fuel. Therefore, impacts would be **less than significant**.

Operational Energy Use

Electricity Usage

The operational phase would require electricity for multiple purposes, including building heating and cooling, lighting, and electronics. CalEEMod was used to estimate project emissions from electricity uses (see Appendix C). Default electricity generation rates in CalEEMod were used based on the proposed land use and climate zone. Table 5.5-2 shows the estimated annual Operational Electricity Demand by land use.

Table 5.5-2. Project Annual Operational Electricity Demand Summary

Electricity Demand	kWh/year
Industrial Business Park with Commercial – Planning Area B-1	9,462,500.99
Parking Lot – Planning Area B-1	272,452.12
Hotel – Planning Area B-2	2,985,252.49
Restaurant – Planning Area B-2	1,282,419.84
Industrial Business Park with Commercial – Planning Area A	3,986,330.21
Total Project Electricity Demand	**17,988,955.64**

Source: Appendix C.
Note: kWh = kilowatt hour

As shown in Table 5.5-2, the project is anticipated to consume approximately 17,988,956 kilowatt hours of electricity per year. The most recent energy data from the California Energy Commission shows that in 2022 the County of San Diego consumed 20,242 gigawatt hours (GWh) (CEC 2023c). The project would represent a 0.9% increase in the total demand for electricity. The project proposes industrial and commercial uses reflecting contemporary energy efficient/energy conserving designs and operational programs. Uses proposed by the project are not inherently energy intensive, and the project electricity demands in total would be comparable to other projects of similar scale and configuration. Additionally, the project would be required to comply with the applicable Title 24 standards and Project Design Feature (PDF) GHG-2, which requires building efficiencies and the provision of solar photovoltaics, and would further ensure that the project energy demands would not be inefficient, wasteful, or otherwise unnecessary and impacts would be **less than significant.**

Natural Gas Usage

Natural gas consumption during operation would be required for various purposes, including, but not limited to, building heating and cooling. Default natural gas generation rates in CalEEMod for the proposed land use and climate zone were used. The project is estimated to have a total natural gas demand of 36,688,148.32 kBTU per year. The most recent

energy data from the California Energy Commission shows that in 2022 the County of San Diego consumed 522.3 million therms (CEC 2023b). The project would represent a 0.007% increase in the total demand for natural gas.

The project proposes conventional industrial and commercial uses reflecting contemporary energy efficient/energy conserving designs and operational programs. Uses proposed by the project are not inherently energy intensive, and the project natural gas demands in total would be comparable to other projects of similar scale and configuration. Additionally, the project is subject to statewide mandatory energy requirements as outlined in Title 24, Part 6, of the California Code of Regulations. Prior to project approval, the applicant would ensure that the project would meet Title 24 requirements applicable at that time, as required by state regulations through their plan review process. Thus, the natural gas consumption of the project would not be considered inefficient or wasteful, and impacts would be **less than significant.**

Petroleum Usage

During operations, most of the fuel consumption resulting from the project would involve the use of motor vehicles traveling to and from the project site, as well as fuels used for alternative modes of transportation that may be used by employees, customers and visitors of the project.

Petroleum fuel consumption associated with motor vehicles traveling to and from the project site is a function of the VMT as a result of project operation. Similar to construction, fuel consumption from transportation was estimated by converting the total CO_2 emissions from each construction phase to gallons using conversion factors for CO_2 to gallons of gasoline or diesel. The conversion factor for gasoline is 8.78 kilograms per metric ton of CO_2 per gallon, and the conversion factor for diesel is 10.21 kilograms per metric ton of CO_2 per gallon (The Climate Registry 2023). Fuel demand estimates for the project are provided in Table 5.5-3.

Table 5.5-3. Total Project-generated Transportation Annual Fuel Demand

Vehicle Type	Vehicle MT CO_2	kg/CO_2/Gallon	Estimated Annual Fuel Consumption (gallons)
Gasoline	9,596.14	8.78	929,232
Diesel	8,108.76	10.21	823,363
		Total	1,751,595

Source: Appendix C.
Notes: Fuel use includes compliance with MM-AQ-4, which requires the use of electric-fueled cargo handling equipment.

As summarized in Table 5.5-3, the project would result in an estimated annual fuel demand of 1,751,595 gallons of fuel. San Diego County was estimated to consume 248,717,737 gallons of diesel fuel in 2023 from Light Heavy Duty Trucks, Medium Heavy Duty Trucks, and Heavy Heavy Duty Trucks (CARB 2024). The Project would a 0.33% increase in diesel. San Diego County was estimated to consume 1.3 billion gallons of gasoline in 2023 from light-duty passenger vehicles (CARB 2024). The project would represent a 0.07% increase in gasoline. Fuel would be provided by current and future commercial vendors. Trip generation and VMT generated by the project are consistent with other industrial/commercial uses of similar scale and configuration. That is, the project does not propose uses or operations that would inherently result in excessive and wasteful vehicle trips and VMT, nor associated excess and wasteful vehicle energy consumption.

Enhanced fuel economies realized pursuant to federal and state regulatory actions, and related transition of vehicles to alternative energy sources (e.g., electricity, natural gas, biofuels, hydrogen cells) would likely decrease future gasoline fuel demands per VMT. Location of the project proximate to regional and local roadway systems

tends to reduce VMT within the region, acting to reduce regional vehicle energy demands. In addition, the project is located within walking distance to the H Street Transit Station and is in a transit priority area and VMT-efficient area. In compliance with CALGreen, the project would promote the use of bicycles as an alternative mean of transportation by providing short-term and/or long-term bicycle parking accommodations. Facilitating pedestrian and bicycle access for employees would reduce VMT and associated energy consumption. As supported by the preceding discussions, project transportation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary and impacts would be **less than significant**.

Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The project would be subject to and would comply with, at a minimum, the California Building Energy Efficiency Standards (24 CCR Part 6). Part 6 of Title 24 establishes energy efficiency standards for nonresidential buildings constructed in California in order to reduce energy demand and consumption. As such, the project would comply with the California code requirements for energy efficiency.

Part 11 of Title 24 sets forth voluntary and mandatory energy measures that are applicable to the project under CALGreen. CALGreen institutes mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential, high-rise residential, state-owned buildings, schools, and hospitals, as well as certain residential and nonresidential additions and alterations. Additionally, energy consumed by the project's operation is calculated to be comparable to energy consumed by other industrial uses of similar scale and intensity that are constructed and operating in California. On this basis, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. This impact would be **less than significant**.

5.5.4 Level of Significance Prior to Mitigation

Impacts related to energy would be **less than significant** prior to mitigation.

5.5.5 Mitigation Measures

No mitigation measures are required.

5.5.6 Level of Significance After Mitigation

There are no mitigation measures proposed and impacts would remain **less than significant.**

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5.6 Geology and Soils

This section describes the existing geological conditions of the project site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed Rohr Wohl Specific Plan Project (proposed project or project). The proposed project will redevelop and repurpose land that has been developed and operated for industrial purposes since about 1941.

The following analysis is based on the Geotechnical Investigation Reports (Geotechnical Reports) prepared by Geocon Inc. The reports are provided as Appendices G1 and G2 to this environmental impact report (EIR). The following analysis is also based on the Paleontological Resources Records Search prepared by the San Diego Natural History Museum and included as Appendix F to this EIR.

5.6.1 Existing Conditions

5.6.1.1 Regulatory Framework

Federal

International Building Code

The International Building Code (IBC) is a model building code developed by the International Code Council that provides the basis for the California Building Code (CBC). The purpose of the IBC is to provide minimum standards for building construction to ensure public safety, health, and welfare. Prior to the creation of the IBC, several different building codes were used; however, by 2000, the IBC had replaced these previous codes. The IBC is updated every 3 years.

Occupational Safety and Health Administration Regulations

The Occupational Safety and Health Administration's Excavation and Trenching standard, Title 29 of the Code of Federal Regulations, Part 1926.650, covers requirements for excavation and trenching operations. The Occupational Safety and Health Administration requires that all excavations where employees could potentially be exposed to cave-ins be protected by sloping or benching the sides of the excavation, supporting the sides of the excavation, or placing a shield between the side of the excavation and the work area.

Paleontological Resources Preservation Act 2009

The Paleontological Resources Preservation Act (which was enacted within the Omnibus Public Land Management Act of 2009) requires the secretaries of the Interior and Agriculture to manage and protect paleontological resources on federal land using scientific principles and expertise. The Paleontological Resources Preservation Act includes specific provisions addressing management of these resources by the Bureau of Land Management, the National Park Service, the Bureau of Reclamation, the U.S. Fish and Wildlife Service, all of the Department of the Interior, and the Forest Service of the Department of Agriculture.

The Paleontological Resources Preservation Act affirms the authority for many of the policies that the federal land-managing agencies already have in place for the management of paleontological resources, such as issuing permits for collecting paleontological resources, curation of paleontological resources, and confidentiality of locality data. The Paleontological Resources Preservation Act only applies to federal lands and does not affect private lands. It

provides authority for the protection of paleontological resources on federal lands, including criminal and civil penalties for fossil theft and vandalism. As directed by the Paleontological Resources Preservation Act, the federal agencies are in the process of developing regulations, establishing public awareness and education programs, and inventorying and monitoring federal lands.

State

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act of 1972 (California Public Resources Code Sections 2621–2630) regulates development and construction of buildings intended for human occupancy to avoid the hazard of surface fault rupture. The act helps define areas where fault rupture is most likely to occur. The act groups faults into categories of active, potentially active and inactive. Historic and Holocene age faults are considered active. Late Quaternary and Quaternary age faults are considered potentially active and pre-Quaternary age faults are considered inactive. These classifications are qualified by the conditions that a fault must be shown to be sufficiently active and well defined by detailed site-specific geologic explorations to determine whether building setbacks should be established. Cities and counties affected by the zones must regulate certain development projects within the zones. They must withhold development permits for sites within the zones until geologic investigations demonstrate that the sites are not threatened by surface displacement from future faulting.

California Building Code

State regulations protecting structures from geo-seismic hazards are contained in the California Code of Regulations, Title 24, Part 2 (the CBC). The purpose of the CBC is to establish minimum standards to safeguard the public health, safety, and general welfare through structural strength, means of egress facilities, and general stability by regulating and controlling the design, construction, quality of materials, use and occupancy, location, and maintenance of all building and structures within its jurisdiction. The CBC is based on the International Building Code published by the International Code Conference. The CBC contains California amendments based on the American Society of Civil Engineers Minimum Design Standards 7-05, which provides requirements for general structural design and includes means for determining earthquake loads and other loads (such as wind loads) for inclusion into building codes. The provisions of the CBC apply to the construction, alteration, movement, replacement, and demolition of every building or structure, or any appurtenances connected or attached to such buildings or structures throughout California.

California Environmental Quality Act

Paleontological resources are limited, nonrenewable resources of scientific, cultural, and educational value and are afforded protection under state laws and regulations, notably, the California Environmental Quality Act (CEQA) (California Public Resources Code Section 21000 et seq.). This report satisfies project requirements in accordance with CEQA and California Public Resources Code Section 5097.5. This analysis also complies with guidelines and significance criteria specified by the Society of Vertebrate Paleontology (SVP 2010).

Paleontological resources are explicitly afforded protection by CEQA, specifically in Section VII(f) of CEQA Guidelines Appendix G, the Environmental Checklist Form, which addresses the potential for adverse impacts to "unique paleontological resource[s] or site[s] or … unique geological feature[s]" (14 CCR 15000 et seq.). This provision covers fossils of signal importance—remains of species or genera new to science, for example, or fossils exhibiting features not previously recognized for a given animal group—as well as localities that yield fossils significant in their abundance, diversity, preservation, and so forth. Further, CEQA provides that, generally, a

resource shall be considered "historically significant" if it has yielded or may be likely to yield information important in prehistory (14 CCR 15064.5 [a][3][D]). Paleontological resources would fall within this category. The California Public Resources Code, Chapter 1.7, Sections 5097.5 and 30244, also regulates removal of paleontological resources from state lands, defines unauthorized removal of fossil resources as a misdemeanor, and requires mitigation of disturbed sites.

California Geological Survey

The California Geological Survey (CGS) provides guidance with regard to seismic hazards. CGS's Special Publication 117A, Guidelines for Evaluating and Mitigating Seismic Hazards in California (2008), provides guidance for evaluation and mitigation of earthquake-related hazards for projects within designated zones of required investigation.

State Earthquake Protection Law

The State Earthquake Protection Law (California Health and Safety Code 19100 et seq.) requires that structures be designed to resist stresses produced by lateral forces caused by wind and earthquakes. Specific minimum seismic safety and structural design requirements are set forth in the CBC. The CBC requires a site-specific geotechnical study to address seismic issues and identify seismic factors that must be considered in structural design. Because the project site is not located within an Alquist–Priolo Earthquake Fault Zone (City of Chula Vista 2005), no special provisions would be required for project development related to fault rupture.

Seismic Hazards Mapping Act of 1990

The Seismic Hazards Mapping Act of 1990 (SHMA) (California Public Resources Code Section 2690 et seq.) directs CGS to identify and map areas prone to liquefaction, earthquake-induced landslides, and amplified ground shaking. The purpose of the SHMA is to minimize loss of life and property through the identification, evaluation, and mitigation of seismic hazards.

The SHMA provides a statewide seismic hazard mapping and technical advisory program to assist cities and counties in fulfilling their responsibilities for protecting public health and safety from the effects of strong ground shaking, liquefaction, landslides, other ground failure, and other seismic hazards caused by earthquakes. Mapping and other information generated pursuant to the SHMA is made available to local governments for planning and development purposes. The state requires local governments to incorporate site-specific geotechnical hazard investigations and associated hazard mitigation as part of the local construction permit approval process, and requires the agent for a property seller, or the seller if acting without an agent, to disclose to any prospective buyer if the property is located within a seismic hazard zone. The state geologist is responsible for compiling seismic hazard zone maps. The SHMA specifies that the lead agency for a project may withhold development permits until geologic or soils investigations are conducted for specific sites and mitigation measures are incorporated into plans to reduce hazards associated with seismicity and unstable soils.

Local

City of Chula Vista General Plan – Environmental Element

Individual project development proposed on property under City of Chula Vista (City) jurisdiction has requirements similar to IBC and CBC requirements, and must comply with Objective E 14 and its three associated policies (E 14.1, E 14.2, and E 14.3) contained in the Environmental Element of the General Plan (Chapter 9, Section 3.1.10) (City

of Chula Vista 2005). Implementation of this objective and policies are intended to reduce potential impacts associated with geological hazards and public safety.

Objective E 14: Minimize the risk of injury, loss of life, and property damage associated with geologic hazards.

Policy E 14.1: To the maximum extent practicable, protect against injury, loss of life, and major property damage through engineering analyses of potential seismic hazards, appropriate engineering design, and the stringent enforcement of all applicable regulations and standards.

Policy E 14.2: Prohibit the subdivision, grading, or development of lands subject to potential geologic hazards in the absence of adequate evidence demonstrating that such development would not be adversely affected by such hazards and would not adversely affect surrounding properties.

Policy E 14.3: Require site-specific geotechnical investigations for proposals within areas subject to potential geologic hazards; and ensure implementation of all measures deemed necessary by the City Engineer and/or Building Official to avoid or adequately mitigate such hazards.

Additionally, the City's Environmental Element addresses potential impacts to non-renewable paleontological resources and outlines policies to mitigate negative impacts (City of Chula Vista 2005). The objective and policies protecting paleontological resources are outlined below:

Objective E 10: Protect important paleontological resources and support and encourage public education and awareness of such resources.

Policy E 10.1: Continue to assess and mitigate the potential impacts of private development and public facilities and infrastructure to paleontological resources in accordance with the California Environmental Quality Act.

Policy E 10.2: Support and encourage public education and awareness of local paleontological resources, including the establishment of museums and educational opportunities accessible to the public.

5.6.1.2 Existing Geologic and Soils Setting

The project site consists of 11 assessor parcels and is divided into three separate planning areas, including Planning Areas A, B-1, and B-2. The eastern portion of the project site, closest to I-5 (between G Street and H Street), is designated as Planning Area A and is 9.29 acres (Figure 4-2, Site Plan). The largest planning area is Planning Area B-1, totaling 26.13 acres. Planning Area B-2, which is located south of B-1, totals 9.36 acres.

Geologic Setting

The geology underlying the project site consists of two surficial soil types (undocumented fill and Holocene-age Bay deposits) and two formational units (Old Paralic Deposits and the San Diego Formation), which are described in more detail below.

Undocumented Fill

Undocumented fill, or late Holocene (less than 4,200 years ago) artificial fill (map unit af), associated with the existing site improvements is present across the majority of the site in depths of about 5 to 10 feet (Kennedy and

Tan 2008; Cohen et al. 2023; Appendix G1 and G2). The fill generally consists of loose to medium dense, moist to wet, silty sand and possesses an expansion index of 50 or less ("very low" to "low"). The fill located below the groundwater elevation has potential for liquefaction. A zone of debris fill located along the previous shoreline of the bay (the western edge of the property) is composed of concrete and trash debris mixed with soil. The upper portion of the fill is likely unsuitable for the support of the proposed structures or structural fill and would require remedial grading. Remedial grading operations would be limited to the groundwater elevation and/or saturated soil conditions (Appendix G1 and G2).

Bay Deposits

Bay Deposits (bay mud) (mapped as Qmo) are late Holocene in age (less than 4,200 years ago) (Kennedy and Tan 2008; Cohen et al. 2023), exist below the undocumented fill or at-grade to a maximum depth of approximately 15 to 20 feet below ground surface on the western portion of Planning Area B, 20 to 30 feet on the eastern portion of Planning Area B, and 20 to 25 feet on Planning Area A. These deposits, in general, consist of very loose to medium dense, silty and clayey sand and soft, wet to saturated sandy silt and clay. Sandy portions of the Bay Deposits have the potential for liquefaction when subjected to strong ground motion, and the soft muds of the Bay Deposits are subject to consolidation settlement. These materials are considered unsuitable for the support of structures or structural fill in their present condition (Appendix G1 and G2).

Young Alluvial Flood Plain Deposits

Late Pleistocene- to Holocene-age (less than approximately 129,000 years old) young alluvial flood plain deposits (mapped as Qya) underlie the northern and eastern portions of the project site at the surface (Kennedy and Tan 2008; Cohen et al. 2023). These deposits generally consist of unconsolidated sandy, silty, or clay-bearing alluvium deposited by the action of recently active streams. These deposits are assigned a low paleontological sensitivity based on their relatively young geologic age and lack of recorded fossil collection localities. However, these deposits may be underlain in the relatively shallow subsurface by a geologic unit with high paleontological sensitivity (i.e., the Bay Point Formation=Old Paralic Deposits) (Appendix F).

Old Paralic Deposits

The late to middle Pleistocene (129,000 to 774,000 years ago) Old Paralic Deposits (mapped as Qop), and correlative with Kennedy's (1975) Bay Point Formation, exist below the undocumented fill, Bay Deposits, and/or young alluvial flood plain deposits across the project site (Kennedy and Tan 2008; Kennedy 1975; Cohen et al. 2023). The Old Paralic Deposits generally consist of medium dense to very dense sand layers interbedded with stiff clay and silt layers that are considered suitable for the support of the proposed structures (Appendix G1 and G2). However, it is not expected that Old Paralic Deposits would be encountered during the construction of the planned improvements unless at depth. If these deposits are encountered, at depth, they would have high paleontological sensitivity.

The San Diego Natural History Museum has five recorded fossil collection localities from the Bay Point Formation (i.e., Old Paralic Deposits) within a 1-mile radius of the project site. All five localities were documented at significant depths below the surface (between 90 and 282 feet below mean sea level) during drilling, and the assignment of these localities to the Bay Point Formation is tentative (Appendix F). The localities produced trace fossil borings, as well as fossil remains of marine invertebrates (e.g., bryozoans, sea urchins, clams, scallops, oysters, jingle shells, snails, barnacles, decapods), marine vertebrates (e.g., sharks and bony fish), and terrestrial vertebrates (e.g., rodents). More broadly, the Bay Point Formation has been assigned a high paleontological sensitivity for the diverse

and well-preserved fossils of marine invertebrates and marine vertebrates that have been recovered from these deposits (Appendix F).

San Diego Formation

The early Pleistocene to late Pliocene (approximately 1.8 million years ago [mya] to 3.6 mya) San Diego Formation typically consists of dense to very silty, to clayey sandstone and siltstone. The top of the San Diego Formation is approximately 150 to 160 feet deep and is not expected to be encountered during the construction of the planned improvements. Although not mentioned in the records search, the San Diego Formation is known to have a high paleontological sensitivity and has yielded numerous important paleontological resources, specifically Pliocene (approximately 2.58 mya to 5.33 mya) marine invertebrates and vertebrates, elsewhere in southwestern San Diego County (Deméré 1982, 1983; County of San Diego 2009; Cohen et al. 2023).

Expansive Soil

Expansive soils contain minerals, such as clay, that are capable of absorbing water and expanding, and losing water and shrinking. As discussed in the Geotechnical Reports, the project site contains soils that are both non-expansive and expansive; however, the majority of the soil encountered possesses a “very low” to “low” expansion potential.

Liquefaction

Liquefaction typically occurs when a site is located in a zone with seismic activity, on-site soils are cohesionless or silt/clay with low plasticity, groundwater is encountered within 50 feet of the surface, and soil densities are less than about 70% of the maximum dry densities. The Geotechnical Reports state that the surficial soil at the site is generally loose/soft and considered to possess a potential for liquefaction below the groundwater elevation. Lateral spreading occurs when liquefiable soil is in the vicinity of a free face such as a slope. The lateral spreading potential in the liquefiable soil below the groundwater table is not considered an adverse impact due to the relatively flat topography of the site and distance to the San Diego Bay from the site (Appendices G1 and G2). The City of Chula Vista General Plan’s Environmental Element identifies the project site to be in a Liquefaction Hazard Area. These are areas with shallow groundwater tables and poorly consolidated granular sediments potentially subject to hazards associated with seismically induced liquefaction (City of Chula Vista 2005).

Storm Surge, Tsunamis, and Seiches

Storm surges are large ocean waves that sweep across coastal areas when storms make landfall. Storm surges can cause inundation, severe erosion, and backwater flooding along the waterfront. The site is located approximately 800 feet from San Diego Bay, is at an elevation of about 10 feet or greater above mean sea level (amsl) and is protected from ocean waves by the Silver Strand to the west. Based on historic and predicated wave heights and runout lengths, the proposed site elevation with neighboring topographic features is likely sufficient to mitigate the risk; therefore, the potential of storm surges affecting the site is low (Appendices G1 and G2).

A tsunami is a series of long period waves generated in the ocean by a sudden displacement of large volumes of water. Historically, tsunami wave heights have ranged up to 3.7 feet in the San Diego area. Wave heights and run-up elevations from tsunamis along the San Diego Coast have historically fallen within the normal range of the tides. The Multi-Jurisdictional Hazard Mitigation Plan (County of San Diego 2017) maps zones of possible tsunami inundation for coastal areas throughout the county. The site is not included within one of these high-risk hazard areas. Therefore, the risk of a tsunami hazard at the site is low (Appendices G1 and G2).

A seiche is a run-up of water within a lake or embayment triggered by fault- or landslide-induced ground displacement. Based on historic and predicated wave heights and runout lengths, the proposed site elevation is sufficient to mitigate the risk; therefore, the potential for seiches to impact the site is low (Appendices G1 and G2).

Groundwater Seepage

Groundwater depths in the vicinity of the site range from approximately 8 to 20 feet below the existing ground surface (approximately 1 to 7 feet amsl) in Planning Area A, and 5 to 8 feet below the existing ground surface (approximately 2 to 5 feet amsl) in Planning Area B. The groundwater is considered brackish due to the proximity of the site to the San Diego Bay and the Pacific Ocean. The soil about 2 to 3 feet above the groundwater elevation may be saturated. Several groundwater monitoring wells exist on and adjacent to the property. The groundwater elevations and seepage conditions are expected to fluctuate due to tidal influences, seasonal precipitation, irrigation, land uses, and other factors.

Slope

Steep slope areas are classified as areas with slopes of 25° or steeper. Such areas are prone to hazards such as slope instability, debris flow, rock falls, erosion, and slope creep. The City does not designate the project site as being in a steep slope area (City of Chula Vista 2005). The Geotechnical Reports identify the project site topography as relatively flat (Appendices G1 and G2).

Faulting and Seismicity

An active fault is defined by CGS as a fault showing evidence of activity roughly within the last 11,000 years (Holocene time). The site is not underlain by active, potentially active, or inactive faults and is not located within a State of California Earthquake Fault Zone. Regionally, the site is located in the Peninsular Ranges geomorphic province. The province is bounded by the San Jacinto Fault Zone on the east. Dominant geologic structural features of the province are northwest- to west-northwest-trending folds and faults, such as the nearby Rose Canyon Fault Zone. Within the coastal plain on San Diego County is a relatively stable block that is dissected by relatively few faults, consisting of the potentially active La Nacion Fault Zone and the active Rose Canyon Fault Zone. Due to the absence of active faults at the subject site, the potential for ground rupture is considered very low.

Landslides

The Geotechnical Reports found no evidence of landslide deposits on the project site, and the City does not designate the site as being in a Landslide Hazard Area.

5.6.2 Thresholds of Significance

The significance criteria used to evaluate the project impacts to geology and soils are based on Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.). According to Appendix G, a significant impact related to geology and soils would occur if the project would:

1. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
    a. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault. Refer to Division of Mines and Geology Special Publication 42.

b. Strong seismic ground shaking.
c. Seismic-related ground failure, including liquefaction.
d. Landslides.

2. Result in substantial soil erosion or the loss of topsoil.
3. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.
4. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.
5. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.
6. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

5.6.3 Impacts

Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area based on other substantial evidence of as known fault? Refer to Division of Mines and Geology Special Publication 42.

An "active fault" is defined by CGS as a fault showing evidence for activity within the last 11,000 years. According to the Geotechnical Reports, the project site is not located on any known active, potentially active, or inactive fault traces or within a State of California Earthquake Special Study Zone or Alquist-Priolo Zone. Additionally, the Geotechnical Reports concluded that no active, potentially active, or inactive faults are present underlying or trending toward the site (Appendices G1 and G2). However, as discussed in Section 5.6.1, Existing Conditions, the Newport–Inglewood and Rose Canyon Fault Zones are located on the San Diego County Coastal Plain. The Newport–Inglewood and Rose Canyon Fault Zones are the nearest known active faults and are the dominant source of potential ground motion. Nonetheless, the proposed project would be constructed in accordance with the City's Grading Ordinance, current seismic design specifications, current CBC standards, and other regulatory requirements, which would reduce the potential for risks related to seismic events. Therefore, since development would not be located within an Alquist-Priolo Zone, and would be in compliance with applicable regulatory requirements, impacts associated with the rupture of a known earthquake fault would be **less than significant**.

Strong seismic ground shaking?

Earthquakes that might occur on the Newport–Inglewood and Rose Canyon Fault Zones or other faults within the Southern California and northern Baja California area are potential generators of significant ground motion at the site. As previously discussed, the Newport–Inglewood and Rose Canyon Fault Zones are the nearest known active faults and are the dominant source of potential ground motion. In the event of a major earthquake on any of the active faults within the Southern California and northern Baja California region, the project site, as with other sites in the general vicinity, could be subject to moderate to severe ground shaking. However, the proposed project would be constructed in accordance with the City's Grading Ordinance, current seismic design specifications, current CBC standards, and other regulatory requirements, which would reduce the potential for risks related to seismic events. Therefore, impacts associated with strong seismic ground shaking would **be less than significant**.

Seismic-related ground failure, including liquefaction?

As discussed in the Geotechnical Reports, the site may be subject to geologic hazards, including moderate to strong seismic shaking, liquefaction, seismically induced settlement, and consolidation settlement. However, soil or geologic conditions at the site are not considered adverse to proposed improvements, assuming they are designed to accommodate typical potential geologic hazards. Remedial grading shall be required for areas with expansive soils (refer to Section 5.6.3[1][d] for further details). However, seismically induced settlement may occur whether the potential for liquefaction exists or not. Although there is potential for seismic-related ground failure to occur, compliance with the City's Grading Ordinance, current seismic design specifications, current CBC standards, and other regulatory requirements would ensure that impacts associated with seismic-related ground failure, including liquefaction, would be **less than significant**.

Landslides?

As discussed in Section 5.6.1.2, the City's General Plan does not designate the project site as an area susceptible to landslides. Additionally, the Geotechnical Reports do not indicate an impact relating to landslides. The project site does not contain slopes susceptible to landslides and is not located within a seismic hazard zone; therefore, the potential for earthquake-induced landslides is considered low. Therefore, impacts associated with landslides would be **less than significant**.

Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impacts

Excavation and ground-disturbing activities during construction of the proposed project could potentially leave loose soil exposed to the erosive forces of rainfall and high winds, which increase the potential for soil erosion and loss of topsoil. As discussed in Section 5.9 of this EIR, Hydrology and Water Quality, construction of the project would result in more than 1 acre of land disturbance; therefore, the project will be required to prepare and implement a site-specific stormwater pollution prevention plan (SWPPP) in accordance with the State Water Resources Control Board Order No. 2009-0008-DWQ National Pollutant Discharge Elimination System General Permit No. CAS00002 (Construction General Permit), amended by Order No. 2010-0014-DWQ and Order No. 2012-0006-DWQ. Conditions of these existing regulations would include adherence to sediment and stormwater pollutant control best management practices (BMPs), effluent monitoring and compliance, post-construction-period requirements, worker training, and various other measures designed to minimize potential for soil erosion and loss of topsoil.

Furthermore, earth-disturbing activities associated with construction would be temporary. Therefore, with construction activities being temporary and with compliance with the Construction General Permit and BMPs outlined in the SWPPP, impacts related to soil erosion and the loss of topsoil would be **less than significant**.

Operational Impacts

The site is currently developed with several industrial buildings. During operation, the project would introduce new infrastructure, resulting in more impervious area to the site. As such, the proposed area to be developed would be graded and paved, greatly reducing the possibility for soil erosion or loss of topsoil compared to current conditions. However, introducing more impervious area would result in more surface runoff, which could lead to more soil erosion and loss of topsoil. On-site runoff is collected and transported by concrete gutters into storm drains located along the western property line of Planning Areas B-1 and B-2. Proper surface drainage for groundwater elevations

of 6 feet amsl would be incorporated into design and construction operations. Additionally, a stormwater quality management plan (SWQMP) has been prepared for the project and is provided in Appendix I to this EIR. The SWQMP has been prepared consistent with the requirements of the City's BMP Design Manual (City of Chula Vista 2022) and with the requirements of San Diego RWQCB Order No. R9-2013-0001 (Regional MS4 Permit).

The SWQMP prepared for the proposed project specifies site design BMPs that would be implemented to minimize soil erosion and loss of topsoil. Site-design BMPs include conserving natural areas, soils, and vegetation; minimizing impervious areas; and minimizing soil compaction. Therefore, with implementation of the SWPPP and incorporation of the BMPs described in the SWQMP, impacts associated with substantial erosion or siltation on or off site would be **less than significant**.

Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

The geology of the project site consists of two surficial soil types (undocumented fill and Holocene-age Bay deposits) and two formational units (Old Paralic Deposits and the San Diego Formation). The project site is underlain by compressible surficial deposits that are likely unsuitable for the support of the proposed structures or structural fill and would require remedial grading.

The proposed project site is not located on any known active, potentially active, or inactive fault traces, although cracking or lateral spreading of the ground surface as a result of nearby seismic events is possible (Appendices G1 and G2). Surface ground cracking or lateral spreading related to shaking from distant events is not considered a significant hazard because the potential for liquefaction and seismically induced settlement occurring within the project site is considered to be very low due to the dense nature of the formational materials and the lack of a shallow groundwater condition (Appendices G1 and G2).

Recommendations identified in the project's Geotechnical Reports (Appendices G1 and G2) to reduce the potential hazards due to liquefaction can be accomplished by the densification or removal of the potentially liquefiable soil or the use of foundation systems that still provide acceptable structural support, should liquefaction occur. Soil densification would be accomplished by compaction grouting, vibrocompaction, soil mixing, and deep dynamic compaction (among others). Deep foundation systems would be used to transmit structural loads to bearing depths below the liquefiable zones and may consist of driven piles or drilled piles. Deep foundations are designed to mitigate damage to the structures supported on the piles; however, they do not generally reduce the potential for damage to underground utilities and peripheral site improvements. The effects of differential settlement between ridged structures and attached settlement-sensitive surface improvements can be mitigated by designing the utilities to accommodate differential movement at the connections. Additionally, proper surface drainage would be necessary. Groundwater elevations of 6 feet amsl would be incorporated into design and construction operations. Groundwater would be a factor in development in liquefaction remediation, deep foundation design and construction, grading operations, and utility installation (Appendices G1 and G2).

Therefore, compliance with existing regulations and recommendations of the Geotechnical Reports would ensure that the proposed project would have **less-than-significant** impacts associated with unstable geologic units.

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

As discussed in Section 5.6.1.2, the project site contains soil that present characteristics considered to be both expansive and non-expansive. Most of the soils encountered possessed a very low to low expansion potential (Expansion Indexes of 50 or less). The project would be required to incorporate recommendations of the Geotechnical Reports, in accordance with CBC standards regarding slab and structural design criteria (refer to Appendices G1 and G2 for further details). Per the Geotechnical Reports, soil with an Expansion Index greater than 50 should not be used as backfill material behind retaining walls. Additionally, expansion joins should be used to reduce unsightly shrinkage cracking. Limiting the slump of the concrete through proper concrete placement and curing and by the placement of crack control joints at periodic intervals—in particular, where re-entrant slab corners occur—should reduce and/or control the occurrence of concrete shrinkage cracks from expansive soils. Therefore, with adherence to current CBC standards and the recommendations of the Geotechnical Reports, impacts associated with expansive soil would be **less than significant**.

Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

The proposed project would not include septic tanks or other alternative wastewater treatment methods. Wastewater from the project site would be conveyed by the City's local 12-inch main sewer line located in G Street. Therefore, implementation of the proposed project would result in **no impact** associated with soils incapable of supporting septic systems or alternative wastewater treatment methods.

Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

According to Appendix F, due to the high paleontological sensitivity of the Bay Point and San Diego Formations in San Diego County, as well as the presence of fossil localities in the vicinity of the project site, construction of the proposed project has the potential to uncover paleontological resources. Any proposed excavation activities that extend deep enough to encounter previously undisturbed deposits of these geologic units (i.e., below the depth of artificial fill, young alluvial flood plain deposits, or any previously disturbed sediments present within the project site) have the potential to impact the paleontological resources preserved therein. Therefore, impacts would be **potentially significant** and mitigation (**Mitigation Measure [MM] GEO-1**, Paleontological Resources Impact Mitigation Plan) would be required.

5.6.4 Level of Significance prior to Mitigation

Due to the potential for construction of the proposed project to impact paleontological resources, impacts prior to mitigation would be **potentially significant**.

5.6.5 Mitigation Measures

The following mitigation measure would be required in order to avoid or reduce potentially significant impacts to paleontological resources:

MM-GEO-1 Paleontological Resources Impact Mitigation Plan. Prior to commencement of any grading activity on site, the applicant shall retain a qualified paleontologist per the 2010 Society of Vertebrate Paleontology guidelines. The paleontologist shall prepare a Paleontological Resources

Impact Mitigation Program (PRIMP) for the project. The PRIMP shall be consistent with the 2010 SVP guidelines and should outline requirements for preconstruction meeting attendance and worker environmental awareness training, where monitoring is required within the proposed project site based on construction plans and/or geotechnical reports, procedures for adequate paleontological monitoring and discoveries treatment, and paleontological methods (including sediment sampling for microvertebrate fossils), reporting, and collections management. The PRIMP shall also include a statement that any fossil lab or curation costs (if necessary due to fossil recovery) are the responsibility of the project proponent/applicant. The qualified paleontologist shall attend the preconstruction meeting and a qualified paleontological monitor shall be on site during any proposed excavation activities that extend deep enough to encounter previously undisturbed deposits of the Bay Point and San Diego Formations. In the event that paleontological resources (e.g., fossils) are unearthed during excavation, the paleontological monitor will temporarily halt and/or divert grading activity to allow recovery of paleontological resources. The area of discovery will be roped off with a 50-foot-radius buffer. Once documentation and collection of the find is completed, the paleontological monitor will remove the rope and allow grading to recommence in the area of the find.

5.6.6 Level of Significance after Mitigation

With implementation of the proposed mitigation in Section 5.6.5, impacts relating to geology, soils, and paleontological resources would be **less than significant**.

5.7 Greenhouse Gas Emissions

This section describes the existing greenhouse gas (GHG) conditions of the project site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed project. The discussion in this section is based on the Air Quality and Greenhouse Gas Emissions Technical Report prepared for the project by August 2024. The complete report is contained in Appendix C of this environmental impact report.

5.7.1 Existing Conditions

5.7.1.1 Regulatory Framework

Federal

Massachusetts v. EPA

Massachusetts v. EPA. In *Massachusetts v. EPA* (April 2007), the U.S. Supreme Court directed the U.S. Environmental Protection Agency (EPA) administrator to determine whether GHG emissions from new motor vehicles cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision. In December 20b09, the administrator signed a final rule with the following two distinct findings regarding GHGs under Section 202(a) of the federal Clean Air Act:

- The administrator found that elevated concentrations of GHGs— carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), ozone (O_3), water vapor, hydrofluorocarbons (HFCs), hydrochlorofluorocarbons (HCFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6) —in the atmosphere threaten the public health and welfare of current and future generations. This is the "endangerment finding."
- The administrator further found the combined emissions of GHGs—CO_2, CH_4, N_2O, and HFCs—from new motor vehicles and new motor vehicle engines contribute to the GHG air pollution that endangers public health and welfare. This is the "cause or contribute finding."

These two findings were necessary to establish the foundation for regulation of GHGs from new motor vehicles as air pollutants under the Clean Air Act.

Energy Independence and Security Act

The Energy Independence and Security Act of 2007 (December 2007), among other key measures, would do the following, which would aid in the reduction of national GHG emissions (EPA 2007):

- Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.
- Set a target of 35 miles per gallon for the combined fleet of cars and light trucks by model year 2020 and direct National Highway Traffic Safety Administration (NHTSA) to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.
- Prescribe or revise standards affecting regional efficiency for heating and cooling products and procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

Federal Vehicle Standards

In response to a U.S. Supreme Court ruling, the Bush Administration issued Executive Order (EO) 13432 in 2007 directing the EPA, the Department of Transportation, and the Department of Energy to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. In 2009, the NHTSA issued a final rule regulating fuel efficiency and GHG emissions from cars and light-duty trucks for model year 2011, and in 2010, the EPA and NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012–2016 (75 FR 25324–25728).

In 2010, President Barack Obama issued a memorandum directing the Department of Transportation, Department of Energy, EPA, and NHTSA to establish additional standards regarding fuel efficiency and GHG reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, the EPA and NHTSA proposed stringent, coordinated federal GHG and fuel economy standards for model years 2017–2025 light-duty vehicles. The proposed standards projected to achieve 163 grams per mile of CO_2 by model year 2025 on an average industry fleet-wide basis, which is equivalent to 54.5 miles per gallon if this level were achieved solely through fuel efficiency. The final rule was adopted in 2012 for model years 2017–2021 (77 FR 62624–63200). On January 12, 2017, the EPA finalized its decision to maintain the current GHG emissions standards for model years 2022–2025 cars and light trucks (EPA 2022).

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011, the EPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018 (76 FR 57106–57513). The standards for CO_2 emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the EPA, this regulatory program will reduce GHG emissions and fuel consumption for the affected vehicles by 6%–23% over the 2010 baselines.

In August 2016, the EPA and NHTSA announced the adoption of the phase two program related to the fuel economy and GHG standards for medium- and heavy-duty trucks. The phase two program will apply to vehicles with model year 2018 through 2027 for certain trailers, and model years 2021 through 2027 for semi-trucks, large pickup trucks, vans, and all types and sizes of buses and work trucks. The final standards are expected to lower CO_2 emissions by approximately 1.1 billion metric ton (MT) and reduce oil consumption by up to 2 billion barrels over the lifetime of the vehicles sold under the program (EPA and NHTSA 2016).

In August 2018, the EPA and NHTSA proposed to amend certain fuel economy and GHG standards for passenger cars and light trucks and establish new standards for model years 2021 through 2026. Compared to maintaining the post-2020 standards in place at the time, the 2018 proposal would increase U.S. fuel consumption by about half a million barrels per day (2%–3% of total daily consumption, according to the Energy Information Administration) and would impact the global climate by 3/1000th of 1°C by 2100. California and other states have stated their intent to challenge federal actions that would delay or eliminate GHG reduction measures, and have committed to cooperating with other countries to implement global climate change initiatives.

In 2019, the EPA and NHTSA published the Safer Affordable Fuel-Efficient Vehicles Rule Part One: One National Program (SAFE-1), which revoked California's authority to set its own GHG emissions standards and set zero-emission vehicle (ZEV) mandates in California. In March 2020, Part Two was issued which set CO2 emissions standards and corporate average fuel economy standards for passenger vehicles and light-duty trucks for model years 2021 through 2026. In response to EO 13990, on December 21, 2021, NHTSA finalized the corporate average fuel economy Preemption rulemaking to withdraw its portions of the Part One Rule. The final rule concluded that the

Part One Rule overstepped the agency's legal authority and established overly broad prohibitions that did not account for a variety of important state and local interests.

Then, in March 2022, NHTSA established new fuel economy standards that would require an industry-wide fleet average of approximately 49 miles per gallon for passenger cars and light trucks in model year 2026, by increasing fuel efficiency by 8% annually for model years 2024 and 2025, and 10% annually for model year 2026.

Inflation Reduction Act of 2022

The Inflation Reduction Act was signed into law by President Biden in August 2022. The bill includes specific investment in energy and climate reform and is projected to reduce GHG emissions within the U.S. by 40% as compared to 2005 levels by 2030. The bill allocates funds to boost renewable energy infrastructure (e.g., solar panels and wind turbines), includes tax credits for the purchase of electric vehicles (EVs), and includes measures that will make homes more energy efficient.

State

The statewide GHG emissions regulatory framework is summarized below by category: state climate change targets, building energy, renewable energy and energy procurement, mobile sources, solid waste, water, and other state regulations and goals. The following text describes EOs, legislation, regulations, and other plans and policies that would directly or indirectly reduce GHG emissions and/or address climate change issues.

State Climate Change Targets

EO S-3-05

EO S-3-05 (June 2005) established the following statewide goals: GHG emissions should be reduced to 2000 levels by 2010, GHG emissions should be reduced to 1990 levels by 2020, and GHG emissions should be reduced to 80% below 1990 levels by 2050.

EO S-3-05 also directed the California EPA to report biannually on progress made toward meeting the GHG targets and the impacts to California due to global warming, including impacts to water supply, public health, agriculture, the coastline, and forestry. The Climate Action Team was formed, which subsequently issued reports from 2006 to 2010.

Assembly Bill (AB) 32. In furtherance of the goals established in EO S-3-05, the legislature enacted AB 32 (Núñez and Pavley). The bill is referred to as the California Global Warming Solutions Act of 2006 (September 27, 2006). AB 32 provided initial direction on creating a comprehensive multiyear program to limit California's GHG emissions at 1990 levels by 2020 and initiate the transformations required to achieve the state's long-range climate objectives.

EO B-30-15. EO B-30-15 (April 2015) identified an interim GHG reduction target in support of targets previously identified under EO S-3-05 and AB 32. EO B-30-15 set an interim target goal of reducing statewide GHG emissions to 40% below 1990 levels by 2030 to keep California on its trajectory toward meeting or exceeding the long-term goal of reducing statewide GHG emissions to 80% below 1990 levels by 2050, as set forth in EO S-3-05. To facilitate achievement of this goal, EO B-30-15 calls for an update to the California Air Resources Board's (CARB's) Scoping Plan to express the 2030 target in terms of million metric tons (MMT) carbon dioxide equivalent (CO_2e). The executive order also calls for state agencies to continue to develop and implement GHG emissions reduction programs in support of the reduction targets. Sector-specific agencies in transportation, energy, water, and forestry were required to prepare GHG reduction plans by September 2015, followed by a report on action taken in relation

to these plans in June 2016. EO B-30-15 does not require local agencies to take any action to meet the new interim GHG reduction target.

Senate Bill (SB) 32 and AB 197. SB 32 and AB 197 (enacted in 2016) are companion bills that set a new statewide GHG reduction targets, make changes to CARB's membership and increase legislative oversight of CARB's climate change-based activities, and expand dissemination of GHG and other air-quality-related emissions data to enhance transparency and accountability. More specifically, SB 32 codified the 2030 emissions reduction goal of EO B-30-15 by requiring CARB to ensure that statewide GHG emissions are reduced to 40% below 1990 levels by 2030. AB 197 established the Joint Legislative Committee on Climate Change Policies, consisting of at least three members of the Senate and three members of the Assembly to provide ongoing oversight over implementation of the state's climate policies. AB 197 also added two members of the Legislature to CARB as nonvoting members; requires CARB to make available and update (at least annually via its website) emissions data for GHGs, criteria air pollutants, and toxic air contaminants (TACs) from reporting facilities; and requires CARB to identify specific information for GHG emissions reduction measures when updating the Scoping Plan.

EO B-55-18. EO B-55-18 (September 2018) establishes a statewide policy for the state to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net-negative emissions thereafter. The goal is an addition to the existing statewide targets of reducing the state's GHG emissions. CARB will work with relevant state agencies to ensure that future scoping plans identify and recommend measures to achieve the carbon neutrality goal.

AB 1279. The Legislature enacted AB 1279, the California Climate Crisis Act, in September 2022. The bill declares the policy of the state to achieve net zero GHG emissions as soon as possible, but no later than 2045, and achieve and maintain net negative GHG emissions thereafter. Additionally, the bill requires that by 2045, statewide anthropogenic GHG emissions be reduced to at least 85% below 1990 levels. Although AB 1279 establishes an overall policy to achieve net zero greenhouse gas emissions as soon as possible, but no later than 2045, recognizing the need to implement carbon dioxide removal and carbon capture, utilization and storage technologies, the Legislature established a specific target of 85% below 1990 levels by 2045 for anthropogenic GHG emissions. Therefore, the net zero target does not directly apply to development projects, but the 2045 target of 85% below 1990 levels represents the reductions required to contribute to accomplishing the State's overall net zero policy.

California Air Resources Board's Climate Change Scoping Plan. One specific requirement of AB 32 was for CARB to prepare a scoping plan for achieving the maximum technologically feasible and cost-effective GHG emission reductions by 2020 (Health and Safety Code Section 38561[a]), and to update the plan at least once every 5 years. In 2008, CARB approved the first scoping plan. The Climate Change Scoping Plan: A Framework for Change (Scoping Plan) included a mix of recommended strategies that combined direct regulations, market-based approaches, voluntary measures, policies, and other emission reduction programs calculated to meet the 2020 statewide GHG emissions limit and initiate the transformations needed to achieve the state's long-range climate objectives. The key elements of the Scoping Plan include the following (CARB 2008a):

1. Expanding and strengthening existing energy efficiency programs, as well as building and appliance standards.
2. Achieving a statewide renewable energy mix of 33%.
3. Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system and caps sources contributing 85% of California's GHG emissions.
4. Establishing targets for transportation-related GHG emissions for regions throughout California, and pursuing policies and incentives to achieve those targets.

5. Adopting and implementing measures pursuant to existing state laws and policies, including California's clean car standards, goods movement measures, and the Low Carbon Fuel Standard (17 CCR 95480 et seq.).
6. Creating targeted fees, including a public goods charge on water use, fees on high global warming potential (GWP) gases, and a fee to fund the administrative costs of the State of California's long-term commitment to AB 32 implementation.

The Scoping Plan also identified local governments as essential partners in achieving California's goals to reduce GHG emissions because they have broad influence and, in some cases, exclusive authority over activities that contribute to significant direct and indirect GHG emissions through their planning and permitting processes, local ordinances, outreach and education efforts, and municipal operations. Specifically, the Scoping Plan encouraged local governments to adopt a reduction goal for municipal operations, and for community emissions to reduce GHGs by approximately 15% from then levels (2008) by 2020. Many local governments developed community-scale local GHG reduction plans based on this Scoping Plan recommendation.

In 2014, CARB approved the first update to the Scoping Plan. The First Update to the Climate Change Scoping Plan: Building on the Framework (First Update) defined the state's GHG emission reduction priorities for the next 5 years, and laid the groundwork to start the transition to the post-2020 goals set forth in EO S-3-05 and EO B-16-2012. The First Update concluded that California is on track to meet the 2020 target but recommended a 2030 mid-term GHG reduction target be established to ensure a continuum of action to reduce emissions. The First Update recommended a mix of technologies in key economic sectors to reduce emissions through 2050, including energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and the rapid market penetration of efficient and clean energy technologies. As part of the First Update, CARB recalculated the state's 1990 emissions level, using more recent GWPs identified by the Intergovernmental Panel on Climate Change (IPCC), from 427 MMT CO_2e to 431 MMT CO_2e (CARB 2014a).

In 2015, as directed by EO B-30-15, CARB began working on an update to the Scoping Plan to incorporate the 2030 target of 40% below 1990 levels by 2030 to keep California on its trajectory toward meeting or exceeding the long-term goal of reducing GHG emissions to 80% below 1990 levels by 2050 as set forth in EO S-3-05. The governor called on California to pursue a new and ambitious set of strategies, in line with the five climate change pillars from his inaugural address, to reduce GHG emissions and prepare for the unavoidable impacts of climate change. In the summer of 2016, the legislature affirmed the importance of addressing climate change through passage of SB 32.

In December 2017, CARB adopted California's 2017 Climate Change Scoping Plan (2017 Scoping Plan) for public review and comment (CARB 2017). The 2017 Scoping Plan builds on the successful framework established in the initial Scoping Plan and First Update while identifying new, technologically feasible and cost-effective strategies that will serve as the framework to achieve the 2030 GHG target as established by SB 32 and define the state's climate change priorities to 2030 and beyond. The strategies' commitments include implementing renewable energy and energy efficiency strategies (including the mandates of SB 350), increasing stringency of the Low Carbon Fuel Standard, implementing measures identified in the Mobile Source and Freight Strategies, implementing measures identified in the proposed Short-Lived Climate Pollutant Reduction Strategy, and increasing stringency of SB 375 targets. To fill the gap in additional reductions needed to achieve the 2030 target, it recommends continuing the Cap-and-Trade Program and a measure to reduce GHGs from refineries by 20%.

For local governments, the 2017 Scoping Plan replaced the initial Scoping Plan's 15% reduction goal with a recommendation to aim for a community-wide goal of no more than 6 MT CO_2e per capita by 2030, and no more

than 2 MT CO_2e per capita by 2050, which are consistent with the state's long-term goals. These goals are also consistent with the Under 2 Memorandum of Understanding (Under 2 2016) and the Paris Agreement, which are developed around the scientifically based levels necessary to limit global warming to below 2°C. The 2017 Scoping Plan recognized the benefits of local government GHG planning (e.g., through climate action plans [CAPs]) and provided more information regarding tools CARB is working on to support those efforts. It also recognized the California Environmental Quality Act (CEQA) streamlining provisions for project-level review where there is a legally adequate CAP.[1]

The Scoping Plan recommends strategies for implementation at the statewide level to meet the goals of AB 32, SB 32, and the executive orders, and establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions. A project is considered consistent with the statutes and executive orders if it meets the general policies in reducing GHG emissions to facilitate the achievement of the state's goals and does not impede attainment of those goals. A project would be consistent if it will further the objectives and not obstruct their attainment.

CARB adopted the 2022 Scoping Plan Update in December 2022, which outlines the state's plan to reach carbon neutrality by 2045 or earlier, while also assessing the progress the state is making toward reducing GHG emissions by at least 40% below 1990 levels by 2030, as is required by SB 32 and laid out in the Second Update. The carbon neutrality goal requires CARB to expand proposed actions from only the reduction of anthropogenic sources of GHG emissions to also include those that capture and store carbon (e.g., through natural and working lands, or mechanical technologies). The carbon reduction programs build on and accelerate those currently in place, including moving to zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high GWP; providing communities with sustainable options for walking, biking, and public transit; displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines); and scaling up new options such as green hydrogen (CARB 2022a).

The 2022 Scoping Plan also emphasizes that there is no realistic path to carbon neutrality without carbon removal and sequestration, and to achieve the state's carbon neutrality goal, carbon reduction programs must be supplemented by strategies to remove and sequester carbon. Strategies for carbon removal and sequestration include carbon capture and storage from anthropogenic point sources, where CO_2 is captured as it leaves a facility's smokestack and is injected into geologic formations or used in industrial materials (e.g., concrete); and carbon dioxide removal from ambient air, through mechanical (e.g., direct air capture with sequestration) or nature-based (e.g., management of natural and working lands) applications.

The 2022 Scoping Plan included Appendix D, Local Actions, which includes recommendations intended to build momentum for local government actions that align with the State's climate goals, with a focus on local GHG reduction strategies (commonly referred to as climate action planning) and approval of new land use development projects, including through environmental review under CEQA. The recommendations provided in Appendix D are non-binding and should not be interpreted as a directive to local governments, but rather as evidence-based analytical tools to assist local governments with their role as essential partners in achieving California's climate goals. Appendix D recognizes consistency with a CEQA-qualified GHG reduction plan such as a CAP as a preferred option for evaluating potential GHG emission impacts under CEQA. Absent a qualified GHG reduction plan, Appendix D provides additional potential threshold options including key attributes that residential and mixed-use projects

[1] *Sierra Club v. County of Napa* (2004) 121 Cal.App.4th 1490; *San Francisco Tomorrow et al. v. City and County of San Francisco* (2015) 229 Cal.App.4th 498; *San Franciscans Upholding the Downtown Specific Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656; *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 719.

should achieve that would align with the State's climate goals, a net-zero threshold, and use of air district recommended thresholds of significance.[2]

SB 605 and SB 1383. SB 605 (2014) required CARB to complete a comprehensive strategy to reduce emissions of short-lived climate pollutants in the state, and SB 1383 (2016) required CARB to approve and implement that strategy by January 1, 2018. The Short-Lived Climate Pollutants Reduction Strategy was approved by CARB in March 2017, and lays out a range of options to reduce short-lived climate pollutant emissions in California, including regulations, incentives, and other market-supporting activities. SB 1383 also establishes specific targets for the reduction of short-lived climate pollutants (40% below 2013 levels by 2030 for CH_4 and HFCs, and 50% below 2013 levels by 2030 for anthropogenic black carbon), and provides direction for reductions from dairy and livestock operations and landfills. Accordingly, and as mentioned above, CARB adopted its Short-Lived Climate Pollutant Reduction Strategy in March 2017. This strategy establishes a framework for the statewide reduction of emissions of black carbon, CH_4, and fluorinated gases.

Building Energy

Title 24, Part 6. Title 24 of the California Code of Regulations was established in 1978 and serves to enhance and regulate California's building standards. Although not initially promulgated to reduce GHG emissions, Part 6 of Title 24 specifically established Building Energy Efficiency Standards that are designed to ensure new and existing buildings in California achieve energy efficiency and preserve outdoor and indoor environmental quality. These energy efficiency standards are reviewed every few years by the Building Standards Commission and California Energy Commission (CEC) and revised if necessary (California Public Resources Code [PRC] Section 25402[b][1]). The regulations receive input from members of industry and the public, with the goal of "reducing of wasteful, uneconomic, inefficient, or unnecessary consumption of energy" (PRC Section 25402). These regulations are carefully scrutinized and analyzed for technological and economic feasibility (PRC Section 25402[d]) and cost effectiveness (PRC Sections 25402[b][2] and [b][3]). As a result, these standards save energy, increase electricity supply reliability, increase indoor comfort, avoid the need to construct new power plants, and help preserve the environment.

The 2022 Title 24 standards are the currently applicable building energy efficiency standards, and became effective on January 1, 2023. The 2022 Title 24 standards improve upon the 2019 standards for new construction of, and additions and alterations to, residential and nonresidential buildings. The CEC adopted the 2022 Title 24 Energy Code in August 2021 and the California Building Standards Commission approved incorporating the updated code into the California Building Standards Code (CALGreen) in December 2021. The 2022 Energy Code went into effect on January 1, 2023. The 2022 Energy Code focuses on four key areas in newly constructed homes and businesses:

- Encouraging electric heat pump technology for space and water heating, which consumes less energy and produces fewer emissions than gas-powered units.
- Establishing electric-ready requirements for single-family homes to position owners to use cleaner electric heating, cooking, and EV charging options whenever they choose to adopt those technologies.
- Expanding solar photovoltaic system and battery storage standards to make clean energy available onsite and complement the state's progress toward a 100% clean electricity grid.
- Strengthening ventilation standards to improve indoor air quality.

[2] The threshold approaches outlined in the 2022 Scoping Plan, Appendix D, are recommendations only and are not requirements; they do not supplant lead agencies' discretion to develop their own evidence-based approaches for determining whether a project would have a potentially significant impact on GHG emissions.

Title 24, Part 11. In addition to the CEC's efforts, in 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11 of Title 24) is commonly referred to as California's Green Building Standards (CALGreen) and establishes minimum mandatory standards and voluntary standards pertaining to the planning and design of sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and interior air quality. The CALGreen standards took effect in January 2011 and instituted mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential and state-owned buildings, schools, and hospitals. The CALGreen 2022 standards, which are the current standards, became effective January 1, 2023.

Title 20. Title 20 of the California Code of Regulations requires manufacturers of appliances to meet state and federal standards for energy and water efficiency. Performance of appliances must be certified through the CEC to demonstrate compliance with standards. New appliances regulated under Title 20 include refrigerators, refrigerator-freezers, and freezers; room air conditioners and room air-conditioning heat pumps; central air conditioners; spot air conditioners; vented gas space heaters; gas pool heaters; plumbing fittings and plumbing fixtures; fluorescent lamp ballasts; lamps; emergency lighting; traffic signal modules; dishwaters; clothes washers and dryers; cooking products; electric motors; low voltage dry-type distribution transformers; power supplies; televisions and consumer audio and video equipment; and battery charger systems. Title 20 presents protocols for testing for each type of appliance covered under the regulations, and appliances must meet the standards for energy performance, energy design, water performance, and water design. Title 20 contains three types of standards for appliances: federal and state standards for federally regulated appliances, state standards for federally regulated appliances, and state standards for non-federally regulated appliances.

AB 1109. Enacted in 2007, AB 1109 required the CEC to adopt minimum energy efficiency standards for general-purpose lighting to reduce electricity consumption by 50% for indoor residential lighting and by 25% for indoor commercial lighting.

SB 1. SB 1 (Murray) (August 2006) established a $3 billion rebate program to support the goal of the state to install rooftop solar energy systems with a generation capacity of 3,000 megawatts through 2016. SB 1 added sections to the Public Resources Code, including Chapter 8.8 (California Solar Initiative), that require building projects applying for ratepayer-funded incentives for photovoltaic systems to meet minimum energy efficiency levels and performance requirements. Section 25780 established that it is a goal of the state to establish a self-sufficient solar industry. The goals included establishing solar energy systems as a viable mainstream option for homes and businesses within 10 years of adoption, and placing solar energy systems on 50% of new homes within 13 years of adoption. SB 1, also termed "Go Solar California," was previously titled "Million Solar Roofs."

California AB 1470 (Solar Water Heating). This bill established the Solar Water Heating and Efficiency Act of 2007. AB 1470 makes findings and declarations of the Legislature relating to the promotion of solar water heating systems and other technologies that reduce natural gas demand. AB 1470 defines several terms for purposes of the act. The bill required a commission to evaluate the data available from a specified pilot program, and to design and implement a program of incentives for the installation of 200,000 solar water heating systems in homes and businesses throughout the state by 2017.

Renewable Energy and Energy Procurement

SB 1078 (2002) established the Renewables Portfolio Standard program, which requires an annual increase in renewable generation by the utilities.

Under the program, a renewable electrical generation facility is one that uses biomass, solar thermal, photovoltaic, wind, geothermal, fuel cells using renewable fuels, small hydroelectric generation of 30 megawatts or less, digester gas, municipal solid waste conversion, landfill gas, ocean wave, ocean thermal, or tidal current, and that meets other specified requirements with respect to its location.

SB 1368. SB 1368 (September 2006) required the CEC to develop and adopt regulations for GHG emission performance standards for the long-term procurement of electricity by local publicly owned utilities. These standards must be consistent with the standards adopted by the California Public Utilities Commission.

EO S-14-08. EO S-14-08 (November 2008) focused on the contribution of renewable energy sources to meet the electrical needs of California while reducing the GHG emissions from the electrical sector. This EO required that all retail suppliers of electricity in California serve 33% of their load with renewable energy by 2020. Furthermore, the EO directed state agencies to take appropriate actions to facilitate reaching this target. The California Natural Resources Agency (CNRA), through collaboration with the CEC and California Department of Fish and Wildlife (formerly the California Department of Fish and Game), was directed to lead this effort.

EO S-21-09 and SBX1-2. EO S-21-09 (September 2009) directed CARB to adopt a regulation consistent with the goal of EO S-14-08 by July 31, 2010. CARB was further directed to work with the California Public Utilities Commission and CEC to ensure that the regulation builds upon the Renewables Portfolio Standard program and was applicable to investor-owned utilities, publicly owned utilities, direct access providers, and community choice providers. Under this order, CARB was to give the highest priority to those renewable resources that provide the greatest environmental benefits with the least environmental costs and impacts on public health and can be developed the most quickly in support of reliable, efficient, cost-effective electricity system operations. On September 23, 2010, CARB initially approved regulations to implement a Renewable Electricity Standard. However, this regulation was not finalized because of subsequent legislation (SB X1-2, Simitian, statutes of 2011) signed by Governor Brown in April 2011.

SB X1 2 expanded the Renewables Portfolio Standard by establishing a renewable energy target of 20% of the total electricity sold to retail customers in California per year by December 31, 2013, and 33% by December 31, 2020, and in subsequent years. Under the bill, a renewable electrical generation facility is one that uses biomass, solar thermal, photovoltaic, wind, geothermal, fuel cells using renewable fuels, small hydroelectric generation (30 megawatts or less), digester gas, municipal solid waste conversion, landfill gas, ocean wave, ocean thermal, or tidal current, and that meets other specified requirements with respect to its location.

SB X1-2 applies to all electricity retailers in the state including publicly owned utilities, investor-owned utilities, electricity service providers, and community choice aggregators. All of these entities must meet the renewable energy goals previously listed.

SB 350. SB 350 (October 2015, Clean Energy and Pollution Reduction Act) further expanded the Renewables Portfolio Standard by establishing a goal of 50% of the total electricity sold to retail customers in California per year by December 31, 2030. In addition, SB 350 included the goal to double the energy efficiency savings in electricity and natural gas final end uses (e.g., heating, cooling, lighting, or class of energy uses on which an energy-efficiency program is focused) of retail customers through energy conservation and efficiency. The bill also requires the California Public Utilities Commission, in consultation with the CEC, to establish efficiency targets for electrical and gas corporations consistent with this goal. Regarding mobile sources, as one of its elements, SB 350 establishes a statewide policy for widespread electrification of the transportation sector, recognizing that such electrification is

required for achievement of the state's 2030 and 2050 reduction targets (see California Public Utilities Code Section 740.12).

SB 100. SB 100 (2018) increased the standards set forth in SB 350 establishing that 44% of the total electricity sold to retail customers in California per year by December 31, 2024, 52% by December 31, 2027, and 60% by December 31, 2030, be secured from qualifying renewable energy sources. SB 100 states that it is the policy of the state that eligible renewable energy resources and zero-carbon resources supply 100% of the retail sales of electricity to California. This bill requires that the achievement of 100% zero-carbon electricity resources do not increase the carbon emissions elsewhere in the western grid and that the achievement not be achieved through resource shuffling.

SB 1020. SB 1020 (September 2022) revises the standards from SB 100, requiring the following percentage of retail sales of electricity to California end-use customers come from eligible renewable energy resources and zero-carbon resources: 90% by December 31, 2035; 95% by December 31, 2040; and 100% by December 31, 2045.

Mobile Sources

State Vehicle Standards (AB 1493 and EO B-16-12). AB 1493 (July 2002) was enacted in a response to the transportation sector accounting for more than half of California's CO_2 emissions. AB 1493 required CARB to set GHG emission standards for passenger vehicles, light-duty trucks, and other vehicles determined by the state board to be vehicles that are primarily used for noncommercial personal transportation in the state. The bill required that CARB set GHG emission standards for motor vehicles manufactured in 2009 and all subsequent model years. CARB adopted the standards in September 2004. EO B-16-12 (March 2012) required that state entities under the governor's direction and control support and facilitate the rapid commercialization of zero-emissions vehicles. It ordered CARB, CEC, California Public Utilities Commission, and other relevant agencies to work with the Plug-in Electric Vehicle Collaborative and the California Fuel Cell Partnership to establish benchmarks to help achieve benchmark goals by 2015, 2020, and 2025. On a statewide basis, EO B-16-12 established a target reduction of GHG emissions from the transportation sector equaling 80% less than 1990 levels by 2050. This directive did not apply to vehicles that have special performance requirements necessary for the protection of the public safety and welfare.

In March 2022, EPA reinstated California's authority under the Clean Air Act to implement its own GHG emission standards and ZEV sales mandate. EPA's action concludes its reconsideration of the 2019 SAFE-1 rule by finding that the actions taken under the previous administration as a part of SAFE-1 were decided in error and are now entirely rescinded.

Heavy Duty Truck and Bus Regulation. CARB adopted the final Heavy-Duty Truck and Bus Regulation on December 31, 2014, to reduce diesel particulate matter, a major source of black carbon, and oxides of nitrogen emissions from heavy-duty diesel vehicles (Cal. Code Regs. tit. 13, § 2025). The rule requires diesel particulate matter filters be applied to newer heavier trucks and buses by January 1, 2012, with older vehicles required to comply by January 1, 2015. The rule will require nearly all diesel trucks and buses to be compliant with the 2010 model year engine requirement by January 1, 2023. CARB also adopted an Airborne Toxic Control Measure to limit idling of diesel-fueled commercial vehicles on December 12, 2013. This rule requires diesel-fueled vehicles with gross vehicle weights greater than 10,000 pounds to idle no more than 5 minutes at any location (Cal. Code Regs. tit. 13, § 2485).

EO S-1-07. Issued on January 18, 2007, EO S-1-07 sets a declining Low Carbon Fuel Standard for GHG emissions measured in CO_2e grams per unit of fuel energy sold in California. The initial target of the Low Carbon Fuel Standard was to reduce the carbon intensity of California passenger vehicle fuels by at least 10% by 2020. The Low Carbon

Fuel Standard was subsequently amended in 2018 to require a 20% reduction in carbon intensity by 2030. This new requirement aligns with the California's overall 2030 target of reducing climate changing emissions to 40% below 1990 levels by 2030, set by SB 32. CARB has adopted implementing regulations for both the 10% and 20% carbon intensity reduction targets.

SB 375. SB 375 (2008) addresses GHG emissions associated with the transportation sector through regional transportation and sustainability plans. SB 375 required CARB to adopt regional GHG reduction targets for the automobile and light-truck sector for 2020 and 2035. Regional metropolitan planning organizations (MPOs) are then responsible for preparing a Sustainable Communities Strategy (SCS) within their Regional Transportation Plan (RTP). The goal of the SCS is to establish a forecasted development pattern for the region that, after considering transportation measures and policies, will achieve, if feasible, the GHG reduction targets. If an SCS is unable to achieve the GHG reduction target, a metropolitan planning organization must prepare an Alternative Planning Strategy demonstrating how the GHG reduction target would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies.

Pursuant to California Government Code Section 65080(b)(2)(K), an SCS does not regulate the use of land; supersede the land use authority of cities and counties; or require that a City's or county's land use policies and regulations, including those in a general plan, be consistent with it. Nonetheless, SB 375 makes regional and local planning agencies responsible for developing those strategies as part of the federally required metropolitan transportation planning process and the state-mandated housing element process.

Advanced Clean Cars Program. The Advanced Clean Cars program (January 2012) is an emissions-control program for model years 2015 through 2025. The program combines the control of smog- and soot-causing pollutants and GHG emissions into a single coordinated package. The package includes elements to reduce smog-forming pollution, reduce GHG emissions, promote clean cars, and provide the fuels for clean cars. To improve air quality, CARB implemented new emission standards to reduce smog-forming emissions beginning with 2015 model year vehicles. It is estimated that by 2025, cars will emit 75% less smog-forming pollution than the average new car sold in 2012. To reduce GHG emissions, CARB, in conjunction with the EPA and NHTSA, adopted new GHG standards for model year 2017 to 2025 vehicles; the new standards are estimated to reduce GHG emissions by 34% in 2025. The zero-emissions vehicle (ZEV) program will act as the focused technology of the Advanced Clean Cars program by requiring manufacturers to produce increasing numbers of ZEVs and plug-in hybrid EVs in the 2018 to 2025 model years.

The Advanced Clean Cars II (ACC II) program establishes the next set of LEV and ZEV requirements for model years after 2025 to contribute to meeting federal ambient air quality ozone standards and California's carbon neutrality standards (CARB 2022b). The ACC II rulemaking package also considers technological feasibility, environmental impacts, equity, economic impacts, and consumer impacts. The ACC II regulations were approved by the California Office of Administrative Law and became effective on November 30, 2022.

AB 1236. AB 1236 (October 2015) (Chiu) required a city, county, or city and county to approve an application for the installation of EV charging stations, as defined, through the issuance of specified permits unless the city or county makes specified written findings based on substantial evidence in the record that the proposed installation would have a specific, adverse impact upon the public health or safety, and there is no feasible method to satisfactorily mitigate or avoid the specific, adverse impact. AB 1236 provided for appeal of that decision to the planning commission, as specified. The bill provided that the implementation of consistent statewide standards to achieve the timely and cost-effective installation of EV charging stations is a matter of statewide concern. The bill required EV charging stations to meet specified standards. AB 1236 required a city, county, or city and county with

a population of 200,000 or more residents to adopt an ordinance, by September 30, 2016, that created an expedited and streamlined permitting process for EV charging stations. The bill also required a city, county, or city and county with a population of fewer than 200,000 residents to adopt this ordinance by September 30, 2017.

EO N-79-20 (September 2020) requires CARB to develop regulations as follows: (1) Passenger vehicle and truck regulations requiring increasing volumes of new ZEVs sold in the State towards the target of 100% of in-State sales by 2035; (2) medium- and heavy-duty vehicle regulations requiring increasing volumes of new zero-emission trucks and buses sold and operated in the State towards the target of 100% of the fleet transitioning to zero- ZEVs by 2045 everywhere feasible and for all drayage trucks to be zero emission by 2035; and (3) strategies, in coordination with other State agencies, the EPA and local air districts, to achieve 100% zero-emission from off-road vehicles and equipment operations in the State by 2035. EO N-79-20 called for the development of a Zero-Emissions Vehicle Market Development Strategy, which was released February 2021, to be updated every 3 years, that ensures coordination and implementation of the EO and outlines actions to support new and used ZEV markets. The primary mechanism for achieving the ZEV target for passenger cars and light trucks is the ACC II Program, approved in August 2022. In addition to ACC II, the Clean Miles Standard regulation will also help enable the goal of 100% ZEV sales in 2035 by creating demand for ZEVs. This regulation will have aggressive requirements for electric miles that will transition ride-hailing fleets to zero-emission operations starting in 2023 and ramping up through 2030. This regulation was approved by CARB in 2021.

Advanced Clean Trucks (ACT) Regulation. The purpose of the ACT Regulation (June 2020) is to accelerate the market for zero- ZEVs in the medium- and heavy-duty truck sector and to reduce emissions NO_x, fine particulate matter, TACs, GHGs, and other criteria pollutants generated from on-road mobile sources (CARB 2022b). Requiring medium- and heavy-duty vehicles to transition to zero-emissions technology will reduce health risks to people living in and visiting California and is needed to help California meet established near- and long-term air quality and climate mitigation targets.

EO B-16-12. EO B-16-12 (2012) directs state entities under the Governor's direction and control to support and facilitate development and distribution ZEVs. On a statewide basis, EO B-16-12 also establishes a GHG emissions reduction target from the transportation sector equaling 80% less than 1990 levels by 2050. In furtherance of this executive order, the Governor convened an Interagency Working Group on ZEVs that has published multiple reports regarding the progress made on the penetration of ZEVs in the statewide vehicle fleet.

Water

SB X7-7/Water Conservation Act of 2009. This regulation required that all water suppliers increase their water use efficiency with an overall goal of reducing per capita urban water use by 20% by December 31, 2020. Each urban water supplier was required to develop water use targets to meet this goal.

EO B-29-15. In response to the ongoing drought in California, EO B-29-15 (April 2015) set a goal of achieving a statewide reduction in potable urban water usage of 25% relative to water use in 2013. The term of the executive order extended through February 28, 2016, although many of the directives have since become permanent water-efficiency standards and requirements. The executive order includes specific directives that set strict limits on water usage in the state. In response to EO B-29-15, the California Department of Water Resources modified and adopted a revised version of the Model Water Efficient Landscape Ordinance that, among other changes, significantly increased the requirements for landscape water use efficiency and broadened its applicability to include new development projects with smaller landscape areas.

EO B-37-16. Issued May 2016, EO B-37-16 directed the State Water Resources Control Board to adjust emergency water conservation regulations through the end of January 2017 to reflect differing water supply conditions across the state. The State Water Resources Control Board also developed a proposal to achieve a mandatory reduction of potable urban water usage that builds off the mandatory 25% reduction called for in EO B-29-15. The State Water Resources Control Board and Department of Water Resources will develop new, permanent water use targets that build on the existing state law requirements that the state achieve 20% reduction in urban water usage by 2020. EO B-37-16 also specifies that the State Water Resources Control Board permanently prohibit water-wasting practices such as hosing off sidewalks, driveways, and other hardscapes; washing automobiles with hoses not equipped with a shut-off nozzle; using non-recirculated water in fountains and other decorative water features; watering lawns in a manner that causes runoff, or within 48 hours after measurable precipitation; and irrigating ornamental turf on public street medians.

EO N-10-21. In response to a state of emergency due to severe drought conditions, EO N-10-21 (July 2021) called on all Californians to voluntarily reduce their water use by 15% from their 2020 levels. Actions suggested in EO N-10-21 include reducing landscape irrigation, running dishwashers and washing machines only when full, finding and fixing leaks, installing water-efficient showerheads, taking shorter showers, using a shut-off nozzle on hoses, and taking cars to commercial car washes that use recycled water.

Solid Waste

AB 939, AB 341, AB 1826, and SB 1383. In 1989, AB 939, known as the Integrated Waste Management Act (PRC Sections 40000 et seq.), was passed because of the increase in waste stream and decrease in landfill capacity. The statute established the California Integrated Waste Management Board, which oversees a disposal reporting system. AB 939 mandated a reduction of waste being disposed of where jurisdictions were required to meet diversion goals of all solid waste through source reduction, recycling, and composting activities of 25% by 1995 and 50% by 2000.

AB 341 (Chapter 476, Statutes of 2011 [Chesbro]) amended the California Integrated Waste Management Act of 1989 to include a provision declaring that it is the policy goal of the state that not less than 75% of solid waste generated be source-reduced, recycled, or composted by 2020, and annually thereafter. In addition, AB 341 required the California Department of Resources Recycling and Recovery (CalRecycle) to develop strategies to achieve the state's policy goal. CalRecycle conducted several general stakeholder workshops and several focused workshops, and in August 2015 published a discussion document titled AB 341 Report to the Legislature, which identified five priority strategies that CalRecycle believed would assist the state in reaching the 75% goal by 2020, legislative and regulatory recommendations, and an evaluation of program effectiveness (CalRecycle 2015).

AB 1826 (Chapter 727, Statutes of 2014, effective 2016) requires businesses to recycle their organic waste (i.e., food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste) depending on the amount of waste they generate per week. This law also requires local jurisdictions across the state to implement an organic waste recycling program to divert organic waste generated by businesses, including multi-family residential dwellings that consist of five or more units. The minimum threshold of organic waste generation by businesses decreases over time, which means an increasingly greater proportion of the commercial sector will be required to comply.

SB 1383 (Chapter 395, Statutes of 2016) establishes targets to achieve a 50% reduction in the level of the Statewide disposal of organic waste from the 2014 level by 2020 and a 75% reduction by 2025. CalRecycle was granted the regulatory authority required to achieve the organic waste disposal reduction targets and establishes

an additional target that not less than 20% of currently disposed edible food is recovered for human consumption by 2025 (CalRecycle 2019).

Other State Regulations and Goals

SB 97. SB 97 (Dutton) (August 2007) directed the Governor's Office of Planning and Research to develop guidelines under CEQA for the mitigation of GHG emissions. In 2008, the Governor's Office of Planning and Research issued a technical advisory as interim guidance regarding the analysis of GHG emissions in CEQA documents. The advisory indicated that the lead agency should identify and estimate a project's GHG emissions, including those associated with vehicular traffic, energy consumption, water usage, and construction activities (OPR 2008). The advisory further recommended that the lead agency determine significance of the impacts and impose all mitigation measures necessary to reduce GHG emissions to a level that is less than significant. The CNRA adopted the CEQA Guidelines amendments in December 2009, which became effective in March 2010.

Under the amended CEQA Guidelines, a lead agency has the discretion to determine whether to use a quantitative or qualitative analysis or apply performance standards to determine the significance of GHG emissions resulting from a particular project (14 CCR 15064.4[a]). The CEQA Guidelines require a lead agency to consider the extent to which a project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions (14 CCR 15064.4[b]). The CEQA Guidelines also allow a lead agency to consider feasible means of mitigating the significant effects of GHG emissions, including reductions in emissions through the implementation of project features or off-site measures. The adopted amendments do not establish a GHG emissions threshold, instead allowing a lead agency to develop, adopt, and apply its own thresholds of significance or those developed by other agencies or experts. The CNRA also acknowledged that a lead agency may consider compliance with regulations or requirements implementing AB 32 in determining the significance of a project's GHG emissions (CNRA 2009a).

With respect to GHG emissions, the CEQA Guidelines state in Section 15064.4(a) that lead agencies should "make a good faith effort, to the extent possible on scientific and factual data, to describe, calculate or estimate" GHG emissions. The CEQA Guidelines note that an agency may identify emissions by either selecting a "model or methodology" to quantify the emissions or by relying on "qualitative analysis or other performance-based standards" (14 CCR 15064.4[a]). Section 15064.4(b) states that the lead agency should consider the following when assessing the significance of impacts from GHG emissions on the environment: the extent a project may increase or reduce GHG emissions as compared to the existing environmental setting; whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions (14 CCR 15064.4[b]).

EO S-13-08. EO Order S-13-08 (November 2008) is intended to hasten California's response to the impacts of global climate change, particularly sea-level rise. Therefore, the executive order directs state agencies to take specified actions to assess and plan for such impacts. The final 2009 California Climate Adaptation Strategy report was issued in December 2009 (CNRA 2009b), and an update, Safeguarding California: Reducing Climate Risk, followed in July 2014 (CNRA 2014). To assess the state's vulnerability, the report summarizes key climate change impacts to the state for the following areas: agriculture, biodiversity and habitat, emergency management, energy, forestry, ocean and coastal ecosystems and resources, public health, transportation, and water.

Local

San Diego Association of Governments (SANDAG)

2021 Regional Transportation Plan/Sustainable Communities Strategy

The passage of SB 375 requires MPOs to prepare an SCS in their RTP. SANDAG serves as the MPO for the San Diego region and is responsible for developing and adopting a SCS that integrates transportation, land use, and housing to meet GHG reduction targets set by CARB. The RTP/SCS is updated every 4 years in collaboration the 18 cities and unincorporated County of San Diego, in addition to regional, state, and federal partners. The most recent, San Diego Forward: The 2021 Regional Plan was adopted in 2021 and provides guidance on meeting or exceed GHG targets through implementation of five key transportation strategies, including complete corridors, high-speed transit services, mobility hubs, flexible fleets, and a digital platform to tie the transportation system together. Through these strategies, the 2021 Regional Plan is projected to reduce per capita GHG emissions from cars and light-duty trucks to 20% below 2005 levels by 2035, exceeding the regions state-mandated target of 19% (SANDAG 2021).

City of Chula Vista

The City of Chula Vista General Plan was updated by the City on December 13, 2005, and most recently amended in 2020. The General Plan provides a long-term strategy to address planning issues for the growth and development of the City and is composed of the following six elements: land use and transportation, economic development, public facilities and services, growth management, environmental, and housing (City of Chula Vista 2005). The project site is located in the Bayfront Planning Area and Harbor District subarea of the General Plan (City of Chula Vista 2005). The goals and policies for improving air quality in the General Plan are as follows:

Land Use and Transportation Element

Policy LUT-23.1: Encourage the use of bicycles and walking as alternatives to driving.

Policy LUT-23.2: Foster the development of a system of inter-connecting bicycle routes throughout the City and region.

Policy LUT-23.5: Provide linkages between bicycle facilities that utilize circulation element alignments and open space corridors.

Policy LUT-23.8: Provide and maintain a safe and efficient system of sidewalks, trails, and pedestrian crossings.

Policy LUT-23.14: Require new development projects to provide internal bikeway systems with connections to the citywide bicycle networks.

Environmental Element

Policy E 6.1: Encourage compact development featuring a mix of uses that locate residential areas within reasonable walking distance to jobs, services, and transit.

Policy E 6.2: Promote and facilitate transit system improvements in order to increase transit use and reduce dependency on the automobile.

Policy E 6.3: Facilitate the use of alternative fuel and low- and zero-emission vehicles and equipment in the community.

Policy E 6.4: Do not site new or re-powered fossil-fueled baseload or peaking-type Electric Generating Facilities and other major toxic emitters within 1,000 feet of sensitive receptors, or site sensitive receptors within 1,000 feet of such facilities.

Policy E 6.5: Ensure Electrical Generating Facilities incorporate cleaner fuel sources and least polluting technologies in order to help transition the City to a less fossil fuel- dependent future, while meeting Chula Vista's energy demand.

Policy E 6.6: Explore incentives to promote voluntary air pollutant reductions, including incentives for developers who go above and beyond applicable requirements and for facilities and operations that are not otherwise regulated.

Policy E 6.7: Encourage innovative energy conservation practices and air quality improvements in new development and redevelopment projects consistent with the City's Air Quality Improvement Plan Guidelines or its equivalent, pursuant to the City's Growth Management Program.

Policy E 6.8: Encourage climate resilient design techniques in new buildings and infrastructure to reduce future risks from climate change-related impacts such as wildfires, extreme heat, and flooding.

Policy E 6.9: Discourage the use of landscaping equipment powered by two-stroke gasoline engines within the City and promote less-polluting alternatives to their use.

Policy E 6.10: The siting of new sensitive receivers within 500 feet of highways resulting from development or redevelopment projects shall require the preparation of a health risk assessment as part of the CEQA review of the project. Attendant health risks identified in the Health Risk Assessment (HRA) shall be feasibly mitigated to the maximum extent practicable, in accordance with CEQA, in order to help ensure that applicable federal and state standards are not exceeded.

Policy E 6.11: Develop strategies to minimize CO hot spots that address all modes of transportation.

Policy E 6.12: Promote clean fuel sources that help reduce the exposure of sensitive uses to pollutants.

Policy E 6.13: Encourage programs and infrastructure to increase the availability and usage of energy-efficient vehicles, such as hybrid electric vehicles, electric vehicles, or those that run on alternative fuels.

Policy E 6.14: Transition the City fleet to 100% "clean" vehicles by integrating hybrid and alternative fuel vehicles as current municipal fleet vehicles are replaced.

Policy E 6.15: Site industries: and other stationary emitters in a way that minimizes the potential impacts of poor air quality on homes, schools, hospitals, and other land uses where people congregate, and disadvantaged populations.

Policy E 6.16: Encourage the use of bicycles through support of bike share opportunities, community bike programs, and the provision of bicycle parking opportunities such as bike racks and bike lockers.

Policy E 6.B.1: Protect and develop shade tree cover along streets and within parking lots as a priority, particularly in new developments or tree-deficient areas.

Policy E 6.B.2: Preferentially plant female street trees to reduce pollen, especially in the most populated areas.

Policy E 6.B.3: Prioritize natural filtration, as opposed to impermeable hardscaping, within new development projects, along roadways, and adjacent to stream and river banks.

Policy E 6.B.4: Update the building code to support best practices in "green building" design, construction, and operations.

Policy E 6.B.5: Provide fast-track permitting for projects that implement "green building" design and construction.

Policy E 6.B.6: Encourage or require all new building construction to incorporate green roofs and encourage conversions of existing roof space to green roofs to reduce heat island effect.

Climate Action Plan

In September 2017, the City adopted its most recent CAP. The CAP includes goals and policies to strengthen the City's climate action efforts that have been underway since 2000. The City's CAP identified a goal of reducing GHG emissions to 15% below 2005 emission levels by 2020 and 55 percent by 2030. The City's implementation actions are focused on the following categories:

- Water Conservation and Reuse
- Waste Reduction
- Renewable and Efficient Energy
- Smart Growth and Transportation

Since the first GHG inventory in 1990 the City's population has increased 84% but GHG emissions have only increased 42%, which has caused the per capita emissions to decrease 23% to 6.1 MT CO_2e per person. CARB's 2022 Scoping Plan has identified a goal of carbon neutrality by 2045 so the City will continue advancing to meet these ambitious goals. Notably, the City's CAP is not considered a "qualified" CAP for tiering per CEQA Guidelines Section 15183.5 because it has not undergone environmental review.

5.7.1.2 Existing Setting

5.7.1.2.1 Climate Change Overview

Climate change refers to any significant change in measures of climate, such as temperature, precipitation, or wind patterns, lasting for an extended period of time (decades or longer). The Earth's temperature depends on the balance between energy entering and leaving the planet's system. Many factors, both natural and human, can cause changes in Earth's energy balance, including variations in the sun's energy reaching Earth, changes in the reflectivity of Earth's atmosphere and surface, and changes in the greenhouse effect, which affects the amount of heat retained by Earth's atmosphere (EPA 2023).

The greenhouse effect is the trapping and build-up of heat in the atmosphere (troposphere) near the Earth's surface. The greenhouse effect traps heat in the troposphere through a threefold process as follows: Short-wave radiation emitted by the Sun is absorbed by the Earth; the Earth emits a portion of this energy in the form of long-wave radiation; and GHGs in the upper atmosphere absorb this long-wave radiation and emit it into space and toward the Earth. The greenhouse effect is a natural process that contributes to regulating the Earth's temperature and creates a pleasant, livable environment on the Earth. Human activities that emit additional GHGs to the atmosphere increase the amount of infrared radiation that gets absorbed before escaping into space, thus enhancing the greenhouse effect and causing the Earth's surface temperature to rise.

The scientific record of the Earth's climate shows that the climate system varies naturally over a wide range of time scales and that in general, climate changes prior to the Industrial Revolution in the 1700s can be explained by natural causes, such as changes in solar energy, volcanic eruptions, and natural changes in GHG concentrations. Recent climate changes, in particular the warming observed over the past century, however, cannot be explained by natural causes alone. Rather, it is extremely likely that human activities have been the dominant cause of that warming since the mid-20th century and is the most significant driver of observed climate change (IPCC 2014; EPA 2023a). Human influence on the climate system is evident from the increasing GHG concentrations in the atmosphere, positive radiative forcing, observed warming, and improved understanding of the climate system (IPCC 2014). The atmospheric concentrations of GHGs have increased to levels unprecedented in the last 800,000 years, primarily from fossil fuel emissions and secondarily from emissions associated with land use changes (IPCC 2014). Continued emissions of GHGs will cause further warming and changes in all components of the climate system, which is discussed further in Section 5.7.1.5, Potential Effects of Climate Change.

5.7.1.2.2 Greenhouse Gases and other Climate Forcing Substances

A GHG is any gas that absorbs infrared radiation in the atmosphere; in other words, GHGs trap heat in the atmosphere. GHGs include, but are not limited to, carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), ozone (O_3), water vapor, hydrofluorocarbons (HFCs), hydrochlorofluorocarbons (HCFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6).[3] Some GHGs, such as CO_2, CH_4, and N_2O, occur naturally and are emitted to the atmosphere through natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Manufactured GHGs, which have a much greater heat-absorption potential than CO_2, include fluorinated gases, such as HFCs, HCFCs, PFCs, and SF_6, which are associated with certain industrial products and processes. A summary of the most common GHGs and their sources is included in the following text.[4] Also included is a discussion of other climate forcing substances.

Carbon Dioxide (CO_2). CO_2 is a naturally occurring gas and a by-product of human activities and is the principal anthropogenic GHG that affects the Earth's radiative balance. Natural sources of CO_2 include respiration of bacteria, plants, animals, and fungus; evaporation from oceans; volcanic out-gassing; and decomposition of dead organic matter. Human activities that generate CO_2 are from the combustion of fuels such as coal, oil, natural gas, and wood and changes in land use.

Methane (CH_4). CH_4 is produced through both natural and human activities. CH_4 is a flammable gas and is the main component of natural gas. Methane is produced through anaerobic (without oxygen) decomposition of waste in

[3] California Health and Safety Code 38505 identifies seven GHGs that CARB is responsible to monitor and regulate to reduce emissions: CO_2, CH_4, N_2O, SF_6, HFCs, PFCs, and NF_3.

[4] The descriptions of GHGs are summarized from the Intergovernmental Panel on Climate Change (IPCC) Fourth Assessment Report (2007), CARB's Glossary of Air Pollution Terms (2023i), and EPA's Glossary of Climate Change Terms (2016).

landfills, flooded rice fields, animal digestion, decomposition of animal wastes, production and distribution of natural gas and petroleum, coal production, and incomplete fossil fuel combustion.

Nitrous Oxide (N_2O). N_2O is produced through natural and human activities, mainly through agricultural activities and natural biological processes, although fuel burning and other processes also create N_2O. Sources of N_2O include soil cultivation practices (microbial processes in soil and water), especially the use of commercial and organic fertilizers, manure management, industrial processes (such as in nitric acid production, nylon production, and fossil-fuel-fired power plants), vehicle emissions, and using N_2O as a propellant (such as in rockets, racecars, and aerosol sprays).

Fluorinated Gases. Fluorinated gases (also referred to as F-gases) are synthetic powerful GHGs emitted from many industrial processes. Fluorinated gases are commonly used as substitutes for stratospheric ozone-depleting substances (e.g., CFCs, HCFCs, and halons). The most prevalent fluorinated gases include the following:

- **Hydrofluorocarbons:** HFCs are compounds containing only hydrogen, fluorine, and carbon atoms. HFCs are synthetic chemicals used as alternatives to ozone-depleting substances in serving many industrial, commercial, and personal needs. HFCs are emitted as by-products of industrial processes and are used in manufacturing.
- **Perfluorocarbons:** PFCs are a group of human-made chemicals composed of carbon and fluorine only. These chemicals were introduced as alternatives, with HFCs, to the ozone depleting substances. The two main sources of PFCs are primary aluminum production and semiconductor manufacturing. Since PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere, these chemicals have long lifetimes, ranging between 10,000 and 50,000 years.
- **Sulfur Hexafluoride:** SF_6 is a colorless gas soluble in alcohol and ether and slightly soluble in water. SF_6 is used for insulation in electric power transmission and distribution equipment, semiconductor manufacturing, the magnesium industry, and as a tracer gas for leak detection.
- **Nitrogen Trifluoride:** NF_3 is used in the manufacture of a variety of electronics, including semiconductors and flat panel displays.

Chlorofluorocarbons (CFCs). CFCs are synthetic chemicals that have been used as cleaning solvents, refrigerants, and aerosol propellants. CFCs are chemically unreactive in the lower atmosphere (troposphere) and the production of CFCs was prohibited in 1987 due to the chemical destruction of stratospheric O_3.

Hydrochlorofluorocarbons (HCFCs). HCFCs are a large group of compounds, whose structure is very close to that of CFCs—containing hydrogen, fluorine, chlorine, and carbon atoms—but including one or more hydrogen atoms. Like HFCs, HCFCs are used in refrigerants and propellants. HCFCs were also used in place of CFCs for some applications; however, their use in general is being phased out.

Black Carbon. Black carbon is a component of fine particulate matter, which has been identified as a leading environmental risk factor for premature death. It is produced from the incomplete combustion of fossil fuels and biomass burning, particularly from older diesel engines and forest fires. Black carbon warms the atmosphere by absorbing solar radiation, influences cloud formation, and darkens the surface of snow and ice, which accelerates heat absorption and melting. Black carbon is a short-lived species that varies spatially, which makes it difficult to quantify the GWP. Diesel particulate matter emissions are a major source of black carbon and are toxic air contaminates (TACs) that have been regulated and controlled in California for several decades to protect public health. In relation to declining diesel particulate matter from CARB's regulations pertaining to diesel engines, diesel

fuels, and burning activities, CARB estimates that annual black carbon emissions in California have reduced by 70% between 1990 and 2010, with 95% control expected by 2020 (CARB 2014a).

Water Vapor. The primary source of water vapor is evaporation from the ocean, with additional vapor generated by sublimation (change from solid to gas) from ice and snow, evaporation from other water bodies, and transpiration from plant leaves. Water vapor is the most important, abundant, and variable GHG in the atmosphere and maintains a climate necessary for life.

Ozone (O_3). Tropospheric O_3, which is created by photochemical reactions involving gases from both natural sources and human activities, acts as a GHG. Stratospheric O_3, which is created by the interaction between solar ultraviolet radiation and molecular oxygen (O_2), plays a decisive role in the stratospheric radiative balance. Depletion of stratospheric O_3, due to chemical reactions that may be enhanced by climate change, results in an increased ground-level flux of ultraviolet-B radiation.

Aerosols. Aerosols are suspensions of particulate matter in a gas emitted into the air through burning biomass (plant material) and fossil fuels. Aerosols can warm the atmosphere by absorbing and emitting heat and can cool the atmosphere by reflecting light.

5.7.1.2.3 Global Warming Potential

Gases in the atmosphere can contribute to climate change both directly and indirectly. Direct effects occur when the gas itself absorbs radiation. Indirect radiative forcing occurs when chemical transformations of the substance produce other GHGs, when a gas influences the atmospheric lifetimes of other gases, and/or when a gas affects atmospheric processes that alter the radiative balance of the Earth (e.g., affect cloud formation or albedo) (EPA 2023a). The IPCC developed the GWP concept to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The GWP of a GHG is defined as the ratio of the time-integrated radiative forcing from the instantaneous release of 1 kilogram of a trace substance relative to that of 1 kilogram of a reference gas (IPCC 2014). The reference gas used is CO_2; therefore, GWP-weighted emissions are measured in metric tons CO_2 equivalent (MT CO_2e).

The current version of the CalEEMod (version 2022) assumes that the GWP for CH_4 is 25 (so emissions of 1 MT of CH_4 are equivalent to emissions of 25 MT of CO_2), and the GWP for N_2O is 298, based on the IPCC Fourth Assessment Report (IPCC 2007). The GWP values identified in CalEEMod were applied to the project.

5.7.1.2.4 Sources of Greenhouse Gas Emissions

Global Inventory

Anthropogenic GHG emissions worldwide in 2020 (the most recent year for which data is available) totaled approximately 49,800 MMT of CO_2e, excluding land use change and forestry (PBL 2022). The top six GHG emitters include China, the United States, the Russian Federation, India, Japan, and the European Union, which accounted for approximately 60% of the total global emissions, or approximately 30,270 MMT CO_2e (PBL 2022). Table 5.7-1 presents the top GHG-emissions-producing entities.

Table 5.7-1. Six Top GHG Producer Entities

Emitting Countries	2020 GHG Emissions (MMT CO_2e)[a,b]
China	14,300
United States	5,640
European Union	3,440
India	3,520
Russian Federation	2,210
Japan	1,160
Total	**30,270**

Source: PBL 2022.
Notes: MMT CO_2e = million metric tons of carbon dioxide equivalent.
[a] Column may not add due to rounding.
[b] GHG emissions do not include land use change and forestry-related GHG emissions.

National Inventory

Per the EPA Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990 to 2021, total United States GHG emissions were approximately 6,340.2 MMT CO_2e in 2021 (EPA 2023b). Total U.S. emissions have decreased by 2.3 percent from 1990 to 2021, down from a high of 15.8 percent above 1990 levels in 2007. Emissions increased from 2020 to 2021 by 5.2 percent (314.3 MMT CO_2e). Net emissions (i.e., including sinks) were 5,586.0 MMT CO_2e in 2021. Overall, net emissions increased 6.4 percent from 2020 to 2021 and decreased 16.6 percent from 2005 levels Between 2020 and 2021, the increase in total GHG emissions was driven largely by an increase in CO_2 emissions from fossil fuel combustion due to economic activity rebounding after the height of the COVID-19 pandemic. The CO_2 emissions from fossil fuel combustion increased by 6.8 percent from 2020 to 2021, including a 11.4 percent increase in transportation sector emissions and a 7.0 percent increase in electric power sector emissions. The increase in electric power sector emissions was due in part to an increase in electricity demand of 2.4 percent since 2020. Overall, there has been a decrease in electric power sector emissions from 1990 through 2021, which reflects the combined impacts of long-term trends in many factors, including population, economic growth, energy markets, technological changes including energy efficiency, and the carbon intensity of energy fuel choices (EPA 2023b).

State Inventory

According to California's 2000–2020 GHG emissions inventory (2022 edition), California emitted approximately 369.2 MMT CO_2e in 2020, including emissions resulting from out-of-state electrical generation (CARB 2022c). The sources of GHG emissions in California include transportation, industry, electric power production from both in-state and out-of-state sources, residential and commercial activities, agriculture, high-GWP substances, and recycling and waste. Table 5.7-2 presents California GHG emission source categories and their relative contributions to the emissions inventory in 2020.

Between 2000 and 2019, per-capita GHG emissions in California have dropped from a peak of 14.0 MT per person in 2001 to 10.5 MT per person in 2019, representing an approximate 25% decrease. In addition, total GHG emissions in 2019 were approximately 7 MMT CO_2e lower than 2018 emissions (CARB 2022c).

Table 5.7-2. GHG Emissions Sources in California

Source Category	Annual GHG Emissions (MMT CO_2e)	Percent of Total*
Transportation	145.6	38.2%
Industrial uses	73.9	19.4%
Electricity generation[a]	62.4	16.4%
Residential and commercial uses	38.8	10.2%
Agriculture and Forestry	30.9	8.1%
High GWP substances	21.3	5.6%
Recycling and waste	8.4	2.2%
Totals	**381.3**	**100%**

Source: CARB 2023.
Notes: GHG = greenhouse gas; GWP = global warming potential; MMT CO_2e = million metric tons of carbon dioxide equivalent. Emissions reflect 2020 California GHG inventory.
Totals may not sum due to rounding.
[a] Includes emissions associated with imported electricity, which account for 19.82 MMT CO_2e.

Per capita GHG emissions in California have dropped from a 2001 peak of 13.8 MT per person to 9.7 MT per person in 2021, a 30% decrease. In 2016, statewide GHG emissions dropped below the 2020 GHG Limit of 431 MMT CO_2e and have remained below the limit since that time (CARB 2022c).

Local Inventories

As part of Chula Vista's climate action program and its commitment to reduce GHG emissions, the Economic Development Department's Conservation Section performs emission inventories to identify GHG sources and to help guide policy decisions. The 2020 GHG Emissions Inventory is the City's latest evaluation of its progress in reaching its emissions reduction goal and builds upon past inventory efforts.

In 2020, community GHG emissions from Chula Vista totaled 1,098,000 MT CO_2e (City of Chula Vista 2017). The sector with the greatest level of emissions was transportation or mobile sources at 581,000 MT CO_2e or fifty three percent (53%) of total emissions. The electricity sector was the second highest source at 260,000 MT CO_2e representing 24% of total community emissions, followed by the natural gas energy use at 191,000 MT CO_2e or 17% of total emission and the lowest contributor to total MT CO_2e was solid waste at 50,000 MT CO_2e or 5%)of the total. Compared to 2005 and 2018, total citywide emissions in 2020 were 17% and 4% lower. 2020 per capita emissions are approximately 37% below 2005 levels and 11% below 2018 levels. Emissions from all energy sectors have decreased by 4% or 21,000 MT CO_2e in total since 2005. Transportation-based emissions are estimated to have decreased 19% or 136,000 MT CO_2e since 2005 and 87,000 MT CO_2e or 13%, since 2018. The solid waste sector had emissions 18% below the 2005 baseline and 4% lower than 2018. Emissions from water (embedded energy) were eight 8% above 2018 emissions but are still 74% below the baseline. Emissions from wastewater remained even at 3,000 MT CO2e (Chula Vista 2022).

5.7.1.2.5 Potential Effects of Climate Change

Globally, climate change has the potential to affect numerous environmental resources through uncertain impacts related to future air temperatures and precipitation patterns. The 2014 IPCC Synthesis Report indicated that warming of the climate system is unequivocal and since the 1950s, many of the observed changes are

unprecedented over decades to millennia. Signs that global climate change has occurred include warming of the atmosphere and ocean, diminished amounts of snow and ice, and rising sea levels (IPCC 2014).

In California, climate change impacts have the potential to affect sea-level rise, agriculture, snowpack and water supply, forestry, wildfire risk, public health, frequency of severe weather events, and electricity demand and supply. The primary effect of global climate change has been a rise in average global tropospheric temperature. Reflecting the long-term warming trend since pre-industrial times, observed global mean surface temperature for the decade 2006–2015 was 0.87°C (1.6°F) (likely between 0.75°C [1.4°F] and 0.99°C [1.8°F]) higher than the average over the 1850–1900 period (IPCC 2018). Scientific modeling predicts that continued emissions of GHGs at or above current rates would induce more extreme climate changes during the twenty-first century than were observed during the twentieth century. Human activities are estimated to have caused approximately 1.0°C (1.8°F) of global warming above pre-industrial levels, with a likely range of 0.8°C to 1.2°C (1.4°F to 2.2°F) (IPCC 2018). Global warming is likely to reach 1.5°C (2.7°F) between 2030 and 2052 if it continues to increase at the current rate (IPCC 2018).

Although climate change is driven by global atmospheric conditions, climate change impacts are felt locally. A scientific consensus confirms that climate change is already affecting California. The Office of Environmental Health Hazard Assessment identified various indicators of climate change in California, which are scientifically based measurements that track trends in various aspects of climate change. Many indicators reveal discernible evidence that climate change is occurring in California and is having significant, measurable impacts in the state. Changes in the state's climate have been observed, including an increase in annual average air temperature with record warmth from 2012 to 2016, more frequent extreme heat events, more extreme drought, a decline in winter chill, an increase in cooling degree days and a decrease in heating degree days, and an increase in variability of statewide precipitation (OEHHA 2018).

Warming temperatures and changing precipitation patterns have altered California's physical systems—the ocean, lakes, rivers, and snowpack—upon which the state depends. Winter snowpack and spring snowmelt runoff from the Sierra Nevada and southern Cascade Mountains provide approximately one-third of the state's annual water supply. Impacts of climate on physical systems have been observed such as high variability of snow-water content (i.e., amount of water stored in snowpack), decrease in snowmelt runoff, glacier change (loss in area), rise in sea levels, increase in average lake water temperature and coastal ocean temperature, and a decrease in dissolved oxygen in coastal waters (OEHHA 2018).

Impacts of climate change on biological systems, including humans, wildlife, and vegetation, have also been observed, including climate change impacts on terrestrial, marine, and freshwater ecosystems. As with global observations, species responses include those consistent with warming: elevational or latitudinal shifts in range, changes in the timing of key plant and animal life cycle events, and changes in the abundance of species and in community composition. Humans are better able to adapt to a changing climate than plants and animals in natural ecosystems. Nevertheless, climate change poses a threat to public health as warming temperatures and changes in precipitation can affect vector-borne pathogen transmission and disease patterns in California as well as the variability of heat-related deaths and illnesses. In addition, since 1950, the area burned by wildfires each year has followed an increasing trend overall.

CNRA has released four California Climate Change Assessments (in 2006, 2009, 2012, and 2018), which have addressed the following: acceleration of warming across the state, more intense and frequent heat waves, greater riverine flows, accelerating sea level rise, more intense and frequent drought, more severe and frequent wildfires, more severe storms and extreme weather events, shrinking snowpack and less overall precipitation, and ocean acidification, hypoxia, and warming. To address local and regional governments' need for information to support

action in their communities, the Fourth Assessment (CNRA 2018) includes reports for nine regions of the state. Key highlights for the San Diego Region include the following (CNRA 2019):

- Temperature is projected to increase substantially, along with mean temperature, heat wave frequency will increase, with more intensity and longer duration.
- Precipitation will remain highly variable but will change in character, with wetter winters, drier springs, and more frequent and severe droughts punctuated by more intense individual precipitation events.
- Wildfire risk will increase in the future as climate warms. The risk for large catastrophic wildfires driven by Santa Ana wind events will also likely increase as a result of a drier autumns leading to low antecedent precipitation before the height of the Santa Ana wind season.

The sea level along San Diego County is expected to rise. High tides combined with elevated shoreline water levels produced by locally and distantly driven wind-driven waves will drive extreme events. Longer-term sea level rise will increase rapidly in the second half of the century and will be punctuated by short periods of storm-driven extreme sea levels that will imperil existing infrastructure, structures, and ecosystems with increasing frequency.

5.7.2 Thresholds of Significance

The significance criteria used to evaluate the project's GHG emissions impacts is based on the recommendations provided in Appendix G of the CEQA Guidelines. For the purposes of this GHG emissions analysis, the project would have a significant environmental impact if it would (14 CCR 15000 et seq.):

7. Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?
8. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?

Global climate change is a cumulative impact; a project participates in this potential impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. There are currently no established thresholds for assessing whether the GHG emissions of a project, such as the project, would be considered a cumulatively considerable contribution to global climate change; however, all reasonable efforts should be made to minimize a project's contribution to global climate change. In addition, while GHG impacts are recognized exclusively as cumulative impacts (CAPCOA 2008), GHG emissions impacts must also be evaluated on a project-level under CEQA.

With respect to GHG emissions, the CEQA Guidelines Section 15064.4(a) states that lead agencies "shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" GHG emissions resulting from a project. The CEQA Guidelines note that an agency has the discretion to either quantify a project's GHG emissions or rely on a "qualitative analysis or performance-based standards" (14 CCR 15064.4[a]). A lead agency may use a "model or methodology" to estimate GHG emissions and has the discretion to select the model or methodology it considers "most appropriate to enable decision makers to intelligently take into account the project's incremental contribution to climate change" (14 CCR 15064.4[c]). The CEQA Guidelines provide that the lead agency should consider the following when determining the significance of impacts from GHG emissions on the environment (14 CCR 15064.4[b]):

The extent a project may increase or reduce GHG emissions as compared to the existing environmental setting.

1. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
2. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

In addition, the CEQA Guidelines specify that "[w]hen adopting or using thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence" (14 CCR 15064.7[c]).

The extent to which a project increases or decreases GHG emissions in the existing environmental setting should be estimated in accordance with Section 15064.4, Determining the Significance of Impacts from Greenhouse Gas Emissions, of the State CEQA Guidelines. The State CEQA Guidelines indicate that when calculating GHG emissions resulting from a project, lead agencies shall make a good-faith effort based on scientific and factual data (Section 15064.4 (a)), and lead agencies have discretion to select the model or methodology deemed most appropriate for enabling decision makers to intelligently assess the project's incremental contribution to climate change (Section 15064.4 (c)).

The State CEQA Guidelines do not indicate an amount of GHG emissions that constitutes a significant impact on the environment. Instead, they authorize the lead agency to consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence (State CEQA Guidelines Sections 15064.4(a) and 15064.7(c)).

Governor's Office of Planning and Research Guidance

The Governor's Office of Planning and Research technical advisory titled, CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review, states that "public agencies are encouraged but not required to adopt thresholds of significance for environmental impacts. Even in the absence of clearly defined thresholds for GHG emissions, the law requires that such emissions from CEQA projects must be disclosed and mitigated to the extent feasible whenever the lead agency determines that the project contributes to a significant, cumulative climate change impact" (OPR 2008). Furthermore, the advisory document indicates that "in the absence of regulatory standards for GHG emissions or other scientific data to clearly define what constitutes a 'significant impact,' individual lead agencies may undertake a project-by-project analysis, consistent with available guidance and current CEQA practice" (OPR 2008).

SCAQMD Guidance

In October 2008, the South Coast Air Quality Management District (SCAQMD) proposed recommended numeric CEQA significance thresholds for GHG emissions for lead agencies to use in assessing GHG impacts of residential and commercial development projects as presented in its Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold (SCAQMD 2008). This guidance document, which builds on the previous guidance prepared by the California Air Pollution Control Officers Association, explored various approaches for establishing a significance threshold for GHG emissions. The draft interim CEQA thresholds guidance document was not adopted or approved by the Governing Board. However, in December 2008, the SCAQMD adopted an interim 10,000 MT

CO_2e per-year screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency (see SCAQMD Resolution No. 08-35, December 5, 2008).

The SCAQMD formed a GHG CEQA Significance Threshold Working Group to work with SCAQMD staff on developing GHG CEQA significance thresholds until statewide significance thresholds or guidelines are established. From December 2008 to September 2010, the SCAQMD hosted working group meetings and revised the draft threshold proposal several times, although it did not officially provide these proposals in a subsequent document. The SCAQMD has continued to consider adoption of significance thresholds for residential and general land use development projects. The most recent proposal, issued in September 2010 proposed the use of 3,000 MT CO_2e per year for mixed-use projects.

In the absence of an adopted numerical threshold for the project region or by SCAQMD, the significance of the project-related GHG emissions can be determined by evaluating the project's compliance with regulations or requirements adopted to implement statewide, regional, or local plans for the reduction or mitigation of GHG emissions.

Approach to Determining Significance

Given that neither the City, nor CARB, San Diego Air Pollution Control District, nor SCAQMD have adopted a numerical threshold of significance for GHG emissions within the City or region, the approach for evaluating the project's impacts related to GHG emissions relies on compliance with applicable plans, policies, or regulations adopted for the purposed of reducing the emissions of GHGs. The compliance evaluation is the sole basis for determining the significance of the project's GHG-related impacts on the environment.

The significance of the project's GHG impacts is based on the project's compliance with statewide GHG reduction regulations and requirements. At the state level, guidance on reduction strategies for GHG emissions has been provided through the CARB Scoping Plans and at the local level through the SANDAG's RTP/SCS and the City's CAP and General Plan. Although the City's most recent CAP adopted in 2017 is not qualified for tiering per CEQA Guidelines Section 15183.5, a project's potential to conflict with the CAP is evaluated in the context of ensuring the project does not conflict with broad regional and state goals.

The Scoping Plan (approved by CARB in 2008 and updated in 2014, 2017, and 2022) provides a framework for actions to reduce California's GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. As discussed above, 2030 marks the next statutory statewide milestone target applicable to the proposed project. Given that the 2017 Scoping Plan is the Update developed for identifying how the state will achieve the 2030 reduction target, it is the most relevant plan for evaluating the project's consistency with statewide GHG emission reduction strategies. The Scoping Plan is not directly applicable to specific projects, nor is it intended to be used for project-level evaluations.[5] Under the Scoping Plan, however, there are several state regulatory measures aimed at the identification and reduction of GHG emissions. CARB and other state agencies have adopted many of the measures identified in the Scoping Plan. Most of these measures focus on area source emissions (e.g., energy usage, high-GWP GHGs in consumer products) and changes to the vehicle fleet (i.e., hybrid, electric, and more fuel-efficient vehicles) and associated fuels (e.g., Low Carbon Fuel Standard), among others.

[5] The Final Statement of Reasons for the amendments to the State CEQA Guidelines reiterates the statement in the Initial Statement of Reasons that "[t]he Scoping Plan may not be appropriate for use in determining the significance of individual projects because it is conceptual at this stage and relies on the future development of regulations to implement the strategies identified in the Scoping Plan" (CNRA 2009a).

CARB's 2017 Scoping Plan specifically emphasizes the importance of reducing vehicle miles traveled (VMT) of on-road vehicles to lower mobile-source GHG emissions to achieve statewide reduction targets. The 2017 Scoping Plan recommends a 15% reduction in total light-duty VMT from the business-as-usual scenario in 2050 in alignment with the Mobile Source Strategy (CARB 2017 and CARB 2021). CARB analysis on the relationship of VMT reductions to state climate goals found that certain land use development projects that have total VMT per capita of 14.3% lower than existing conditions, and light-duty VMT per capita of 16.8% lower than existing conditions could be considered consistent with transportation assumptions assumed for the 2017 Scoping Plan and with the state's long-term (i.e., 2050) GHG reduction goals (CARB 2019). Per Section 15064.3 of the revised (2022) CEQA Guidelines, VMT is the most appropriate measure of transportation impacts, and is defined as the amount and distance of automobile traffic attributable to a project. This methodology is consistent with the guidance provided in OPR's Technical Advisory on Evaluating Transportation Impacts in CEQA, which assists with making significance determinations for transportation impacts in accordance with SB 743. Per the CEQA Guidelines, VMT is the most appropriate metric to ensure that transportation impacts from project-level environmental review under CEQA align with the state's long-term GHG reduction goals (OPR 2018).

CARB adopted the *2022 Scoping Plan Update* in May 2022 to discuss progress toward reaching the 2030 target and to address how the state will achieve carbon neutrality by 2045, as required by EO B-55-18. As the official guidance on approach to reaching the 2045 statewide goal, consideration of the 2022 Plan is considered appropriate for evaluation of GHG emission impacts of the proposed Project.

In the 2022 Plan, CARB builds on and accelerates programs already in place to reduce anthropogenic sources of GHG emissions and introduces new strategies to capture and store carbon. *Appendix D: Local Actions* of the Draft Plan outlines local actions that residential and mixed-use projects can implement to address their largest sources of emissions including transportation electrification, VMT reduction, and building decarbonization. CARB identifies these three sources as "Priority Areas" given that they represent those with the highest GHG reduction potential and GHG reduction opportunities for which local governments and agencies have the most authority (CARB 2022a).

Importantly, the 2022 Update emphasizes that there is no realistic path to reaching the 2045 goal of carbon neutrality without removing and sequestering carbon from the atmosphere. So, in addition to programs that aim to reduce GHG emissions, the Draft Plan proposes strategies to capture and store carbon, highlighting the importance of nature-based solutions through preservation and climate smart management of the state's natural and working lands (NWLs). Modeling conducted for the Draft Scoping Plan shows that California's NWLs are projected to be a net source of emissions (i.e., releasing more CO_2 emissions than they store) through 2045, which is historically due to human activities, such as land use change, and natural disturbances, such as wildfire. Therefore, the ability of the state's NWLs to act as a net sink (i.e., sequester and store more atmospheric CO_2 than they release) to help support the state's carbon neutrality goals is dependent on climate smart land management.

If the project does not conflict with the regulations and actions outlined in the applicable state plans (i.e., 2022 Scoping Plan, and local plans (i.e., SANDAG RTP/SCS and City's CAP and General Plan), the Project could appropriately rely on their use as showing compliance with performance-based standards adopted to fulfill the statewide goal for reducing GHG emissions. The project's compliance with regulatory programs adopted by CARB, and other state and local agencies is therefore used to evaluate the significance of the project's GHG emissions.

Nevertheless, and in accordance with Section 15064.4 of the State CEQA Guidelines, GHG emissions resulting from construction and operation of the project were quantitatively estimated in Section 5.7.3.7. The project site consists of developed land occupied by the former Rohr Aircraft Facility and includes several industrial buildings historically used for manufacturing, warehousing, research and development, and related office uses. The potential impacts

from project related GHG emissions were assessed based on the increase in GHG emissions from the project by subtracting emissions from the existing land uses that were in operation up until 2020 and form the baseline conditions. The City's GHG inventories use 1990, 2005, and 2012 as recent inventory dates. The 2021 SANDAG RTP/SCS uses 2016 as a baseline year. CARB's Scoping Plan is based on reducing 1990 emissions 40% by 2030. The GHG emissions associated with implementation of the project were estimated using industry standard and accepted software tools, techniques, and emissions factors, as described below for construction and operation. Estimation of emissions is for informational purposes only, for comparison with existing environmental conditions.

Approach and Methodology

Calculations for construction and operation were based on the assumptions and methodology contained in Appendix C: Air Quality and Greenhouse Gas Emissions Technical Report Rohr Wohl Specific Plan Project, City of Chula Vista, California, specifically Appendix C Section 2.3.3 and Section 3.3.2.

Construction

CalEEMod Version 2022.1 was used to estimate potential project generated GHG emissions during construction. Construction of the project would result in GHG emissions primarily associated with use of off-road construction equipment, on-road hauling, and vendor (material delivery) trucks, and worker vehicles. All details for construction criteria air pollutants discussed in Appendix C, Table 3-9 and Section 5.2, Air Quality, are also applicable for the estimation of construction related GHG emissions. As such, see Section 5.2, Air Quality for a discussion of construction emissions calculation methodology and assumptions. Planning Area A is already built-out and is only requiring rezoning. Accordingly, no construction emissions for Planning Area A have been estimated and included in the analysis.

Operation

As with the air quality analysis, emissions from the operational phase of the project were estimated primarily using CalEEMod Version 2022.1. All details for operational criteria air pollutants discussed in Appendix C, Table 3-10 and Section 5.2 Air Quality, are also applicable for the estimation of operation-related GHG emissions. An operational year of 2030 was assumed consistent with completion of project construction. Because there are existing uses on the project site those emissions were subtracted from the project's emissions to arrive at the net increase in GHG emissions.

Area Sources

CalEEMod was used to estimate operational GHG emissions from area sources, such as landscape maintenance equipment (see Appendix C Section 2.3.3 and Section 3.3.2 for details). Emissions associated with natural gas usage in space heating and water heating are calculated in the building energy use module of CalEEMod, as described in the following text.

Landscape maintenance includes fuel combustion emissions from equipment such as lawn mowers, rototillers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers. The emissions associated from landscape equipment use are estimated based on CalEEMod default values for emission factors (grams per square foot of nonresidential building space per day) and number of summer days (when landscape maintenance would generally be performed) and winter days. For San Diego County, the average annual "summer" days are estimated to 365

days; however, it is assumed that landscaping equipment would likely only operate during the week (not weekends), so operational days were assumed to be 180 days per year in CalEEMod (CAPCOA 2022).

Energy Sources

As represented in CalEEMod, energy sources include emissions associated with building electricity and natural gas usage (non-hearth). Electricity use would contribute indirectly to GHGs, since GHG emissions occur at the site of the power plant, which is typically off site. Annual natural gas (non-hearth) and electricity emissions were estimated in CalEEMod using the emission factors for San Diego Gas and Electric Company (SDG&E), which would be the energy source provider for the Project. SDG&E receives electric power from a variety of sources (see Appendix C Section 2.3.3 and Section 3.3.2). In 2021, 44.5% of SDG&E's power mix came from eligible renewable energy sources, including biomass/waste, geothermal, solar, and wind sources (SDG&E 2022).

In CalEEMod 2022, the default energy use from nonresidential land uses is based on 2019 consumption estimates from the CEC's 2018-2030 Uncalibrated Commercial Sector Forecast (Commercial Forecast), and the energy use from residential land uses is based on the 2019 Residential Appliance Saturation Survey (RASS). The Commercial Forecast and RASS datasets derive energy intensities of different end use categories for different land use subtypes for electricity demand forecast zones throughout the state. However, the energy use estimates are based on existing buildings and residences and are not representative of those constructed in compliance with energy efficiency requirements of the latest Title 24 Building Energy Efficiency Standards (e.g., the average residence surveyed in the RASS was constructed in 1974). Therefore, per Appendix D*, Technical Source Documentation for Emissions Calculations*, of the CalEEMod Version 2022.1 User Guide, "the default energy consumption estimates provided in CalEEMod based on the Commercial Forecast and RASS are very conservative, overestimating expected energy use compared to what would be expected for new buildings subject to the latest Energy Code with more stringent energy efficiency measures" (CAPCOA 2022).

Because the project may include refrigerated uses in the future, the industrial business park with commercial land uses were modeled with the energy estimates for a refrigerated warehouse, which represented a higher amount of energy use.

Mobile Sources

All details for criteria air pollutants discussed in Appendix C Section 2.3.3 and Section 3.3.2 and Section 5.2, Air Quality (Approach and Methodology, Operations subsection), are also applicable for the estimation of operational-related GHG emissions are also applicable for the estimation of operational mobile source GHG emissions. Regulatory measures related to mobile sources include AB 1493 (Pavley) and related federal standards. AB 1493 required that CARB establish GHG emission standards for automobiles, light-duty trucks, and other vehicles that are primarily used for noncommercial personal transportation in the state. In addition, the NHTSA and EPA have established corporate fuel economy standards and GHG emission standards, respectively, for automobiles and light, medium, and heavy-duty vehicles. Implementation of these standards and fleet turnover (replacement of older vehicles with newer ones) will gradually reduce emissions from the Project's motor vehicles. The effectiveness of fuel economy improvements was evaluated using the CalEEMod emission factors for motor vehicles in 2028 to the extent it was captured in CalEEMod 2022.1 which is based on EMFAC2021.

Water and Wastewater

Supply, conveyance, treatment, and distribution of water for the project require the use of electricity, which would result in associated indirect GHG emissions. Similarly, wastewater generated by the project requires the use of electricity for conveyance and treatment, along with GHG emissions generated during wastewater treatment. The GHG emissions associated with Project water consumption were estimated using CalEEMod defaults. (see Appendix C, Section 2.3.3 and Section 3.3.2)

Solid Waste

The project would generate solid waste, and therefore, result in CO_2e emissions associated with landfill off-gassing. CalEEMod default values for solid waste generation were used to estimate GHG emissions associated with solid waste. (see Appendix C Section 2.3.3 and Section 3.3.2 for details)

Refrigerants

Refrigerants are substances used in the equipment for air conditioning (A/C) and refrigeration. Most of the refrigerants used today are HFCs or blends thereof, which can have high GWP values. All equipment that uses refrigerants has a charge size (i.e. quantity of refrigerant the equipment contains) and an operational refrigerant leak rate, and each refrigerant has a GWP that is specific to that refrigerant. CalEEMod quantifies refrigerant emissions from leaks during regular operation and routine servicing over the equipment lifetime, and then derives average annual emissions from the lifetime estimates.

Refrigerant emissions are associated with buildings and mobile sources primarily from A/C usage.

As noted previously, the project may include refrigerated uses in the future, as such the industrial business park with commercial land uses were modeled as refrigerated warehouses to account for additional refrigerant. (see Appendix C Section 2.3.3 and Section 3.3.2 for details)

5.7.3 Impacts

Is should be noted that case law (North County Advocates v. City of Carlsbad (2015) 241 Cal.App.4th 94, 105-106) allows a credit for existing uses and structures, even when not currently in operation; however, to be conservative the following analysis does not take existing uses into consideration.

Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, or would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

As discussed previously, the project's compliance with regulatory programs adopted by CARB, and other state and local agencies is used to evaluate the significance of the project's GHG emissions. The project's potential to conflict with applicable GHG reduction plans is evaluated below.

5.7.3.1 Project Potential to Conflict with the City's Climate Action Plan

The City's most recent CAP adopted in 2017 identified new goals and policies to strengthen the City's past climate action planning efforts. While the CAP is not qualified for tiering per CEQA Guidelines Section 15183.5, a project's potential to conflict with the CAP is evaluated in context of ensuring the project does not conflict with broad regional

and state goals. In general, if a project implements all applicable measures of the CAP, then the project would be found to have a less than cumulatively considerable contribution to climate change impacts.

The proposed project's potential to conflict with relevant CAP strategies is provided in Table 5.7-3. As shown, the project would not conflict with any of the applicable CAP strategies designed to reduce GHG emissions within the City, including measures to reduce GHG emission from energy, transportation, water use, and solid waste generation during construction and operations.

Table 5.7-3. Project Potential to Conflict with City of Chula Vista Climate Action Plan

Action	Objective	Reduction Strategy	Potential to Conflict
Water Conservation and Reuse	Water Education and Enforcement	Expand education and enforcement (through fines) targeting landscape water waste.	**Not applicable.** This is a City measure, however, the project would not impede City efforts regarding education and enforcement. The project would be designed in accordance with the City's Landscape Water Conservation Ordinance.
	Water Efficiency Upgrades	Update the City's Landscape Water Conservation Ordinance to promote more water-wise landscaping designs.	**Not applicable.** This is a City measure, however the project would not impeded the City's efforts focused on water efficiency upgrades. The project would be designed in accordance with the City's Landscape Water Conservation Ordinance.
		Require water-savings retrofits in existing buildings at a specific point in time (not point of sale).	**Not applicable.** The project would construct new buildings on the project site in Planning Areas B-1 and B-2. Within Planning Area A, the project is incorporating updates to the existing building.
	Water Reuse Plan and System Installations	Develop a Water Reuse Master Plan to maximize the use of stormwater, recycled water, and onsite water reclamation.	**Not applicable.** This is a City measure, however, the project would not impede the City's efforts in developing a water reuse plan.
		Streamline complex graywater systems permit review.	**Not applicable.** This is a City measure, however, the project would not impede the City's efforts to streamline permitting.

Table 5.7-3. Project Potential to Conflict with City of Chula Vista Climate Action Plan

Action	Objective	Reduction Strategy	Potential to Conflict
Waste Reduction	Zero Waste Plan	Develop a Zero Waste Plan to supplement statewide green waste recycling, and plastic bag ban efforts.	**Not applicable.** This is a City measure, however, the project would not impede the City's efforts to implement a Zero Waste Plan. The project would comply with regulatory measures to reduce waste during construction and operations.
Renewable and Efficient Energy	Energy Education and Enforcement	Expand education targeting key community segments (i.e., do-it-yourself and Millennials) and facilitating energy performance disclosure (i.e., Green Leases and Home Energy Ratings).	**Not applicable.** This is a City measure, however, the project would not impede the City's efforts to expand education and enforcement.
		Leverage the building inspection process to distribute energy-related information and to deter unpermitted, low performing energy improvements.	**Not applicable.** This is a City measure, however, the project would not impede the City's efforts to leverage the building inspection process to distribute energy-related information.
	Clean Energy Sources	Incorporate solar photovoltaic into all new residential and commercial buildings (on a project-level basis). Provide more grid-delivered clean energy (up to 100%) through Community Choice Aggregation or other mechanism.	***No conflict.*** The project would develop new commercial buildings that will comply with CalGreen Standards for photovoltaic systems.
	Energy Efficiency Upgrades	Expand the City's "cool roof" standards to include re-roofs and western areas.	**Not applicable.** This is a City measure, however, the project would not impede the City's efforts regarding "cool roof" standards.
		Facilitate more energy upgrades in the community through tax breaks, rebates, and more local energy	**Not applicable.** This is a City measure, however, the project would not impede the City's efforts in facilitating energy

Table 5.7-3. Project Potential to Conflict with City of Chula Vista Climate Action Plan

Action	Objective	Reduction Strategy	Potential to Conflict
		efficiency programming.	upgrades in the community.
		Require energy - savings retrofits in existing buildings at a specific point in time (not at point of sale).	**Not applicable.** The project would construct new buildings on the project site in Planning Areas B-1 and B-2. Within Planning Area A, the project is incorporating updates to the existing building.
	Robust Urban Forests	Plant more shade trees to save energy, address heat island issues, and improve air quality.	***No conflict.*** The project would include new landscaping in accordance with Specific Plan standards.
Smart Growth and Transportation	Complete Streets and Neighborhoods	Incorporate "Complete Streets" principles into the Bicycle and Pedestrian Master Plans and Capital Improvement Program.	**Not applicable.** This is a City measure, however, the project would not impede the City's efforts in developing "complete streets".
		Encourage higher density and mixed - use development in Smart Growth areas, especially around trolley stations and other transit nodes.	***No conflict.*** The project would develop more robust uses on an underutilized site in an areas targeted for growth by the City.
	Transportation Demand Management	Utilize bike facilities, transit access/passes, and other Transportation Demand Management and congestion management offerings.	***No conflict.*** Future tenants of the project would provide bicycle parking and transit passes in accordance with MM AQ-7.
		Expand bike-sharing, car-sharing, and other "last mile" transportation options.	***No conflict.*** Future tenants of the project would provide bicycle parking and transit passes in accordance with MM AQ-7.
	Alternative Fuel Vehicle Readiness	Support the installation of more local alternative fueling stations and designate preferred parking for alternative fuel vehicles.	***Not applicable.*** The project would not impede efforts to install more local alternative fueling stations.
		Designate preferred parking for alternative fuel vehicles.	***Not applicable.*** The project would not impede efforts to designate

Table 5.7-3. Project Potential to Conflict with City of Chula Vista Climate Action Plan

Action	Objective	Reduction Strategy	Potential to Conflict
			preferred parking for alternative fuel vehicles.
		Design all new residential and commercial buildings to be "Electric Vehicle Ready."	***Consistent.*** The project would comply with CalGreen requirements for provision of electric vehicle charging equipment.

Source: City of Chula Vista, 2017

5.7.3.2 Project Potential to Conflict with State Reduction Targets and CARB's 2022 Scoping Plan

As discussed above, the California State Legislature passed AB 32 to provide initial direction to limit California's GHG emissions to 1990 levels by 2020 and initiate the state's long-range climate objectives. Since the passage of AB 32, the State has adopted GHG emissions reduction targets for future years beyond the initial 2020 horizon year. CARB is required to develop the Scoping Plan, which provides the framework for actions to achieve the State's GHG emission targets. While the Scoping Plan is not directly applicable to specific projects, nor is it intended to be used for project-level evaluations, it is the official framework for the measures and regulations that will be implemented to reduce California's GHG emissions in alignment with the adopted targets. Therefore, a project would be found to not conflict with the statutes if it would meet the Scoping Plan policies and would not impede attainment of the goals therein.

For the project, the relevant GHG emissions reduction targets include those established by SB 32 and AB 1279, which require GHG emissions be reduced to 40% below 1990 levels by 2030, and 85% below 1990 levels by 2045, respectively. In addition, AB 1279 requires the state achieve net zero GHG emissions by no later than 2045 and achieve and maintain net negative GHG emissions thereafter. CARB's 2017 Scoping Plan update was the first to address the state's strategy for achieving the 2030 GHG reduction target set forth in SB 32 (CARB 2017), and the most recent CARB 2022 Scoping Plan update outlines the state's plan to reduce emissions and achieve carbon neutrality by 2045 in alignment with AB 1279 and assesses progress is making toward the 2030 SB 32 target (CARB 2022a). As such, given that SB 32 and AB 1279 are the relevant GHG emission targets, the 2017 and 2022 Scoping Plan updates that outline the strategy to achieve those targets, are the most applicable to the Project.

The 2017 *Climate Change Scoping Plan Update* (Second Update) included measures to promote renewable energy and energy efficiency (including the mandates of SB 350), increase stringency of the Low Carbon Fuel Standard, measures identified in the Mobile Source and Freight Strategies, measures identified in the proposed Short-Lived Climate Pollutant Plan, and increase stringency of SB 375 targets. The *2022 Scoping Plan for Achieving Carbon Neutrality* (Third Update) builds upon and accelerates programs currently in place, including moving to zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high GWP; providing communities with sustainable options for walking, biking, and public transit; and displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines) (CARB 2022a).

Many of the measures and programs included in the Scoping Plan would result in the reduction of project-related GHG emissions with no action required at the project-level, including GHG emission reductions through increased energy efficiency and renewable energy production (SB 350), reduction in carbon intensity of transportation fuels (Low Carbon Fuel Standard), and the accelerated efficiency and electrification of the statewide vehicle fleet (Mobile Source Strategy).

The 2045 carbon neutrality goal required CARB to expand proposed actions in the Third Update to include those that capture and store carbon in addition to those that reduce only anthropogenic sources of GHG emissions. The proposed project would support the state's carbon neutrality goals, as implementation includes addition of urban-tree and native plantings throughout the project site, which represent opportunities for potential carbon removal and sequestration over the project life-time. However, the Third Update emphasizes that reliance on carbon sequestration in the state's natural and working lands will not be sufficient to address residual GHG emissions, and achieving carbon neutrality will require research, development, and deployment of additional methods to capture atmospheric GHG emissions (e.g., mechanical direct air capture). Given that the specific path to neutrality will require development of technologies and programs that are not currently known or available, the project's role in supporting the statewide goal would be speculative and cannot be wholly identified at this time.

Table 5.7-4 evaluates the project's potential to conflict with the measures from the 2022 Scoping Plan, that are relevant and applicable to the project.

Table 5.7-4. Project Potential to Conflict with 2022 Scoping Plan

Sector	Action	Potential to Conflict
GHG Emissions Reductions Relative to the SB 32 Target	40% below 1990 levels by 2030	***No conflict.*** While the SB 32 GHG emissions reduction target is not an Action that is analyzed independently, it is included in Table 2-1 of the 2022 Scoping Plan for reference. The project would not obstruct or interfere with agency efforts to meet the SB 32 reduction goal. Specifically, the project would include MM-AQ-4 and MM-AQ-6 which would reduce GHG emissions from both onsite and off-site mobile GHG sources.
Smart Growth/VMT	VMT per capita reduced 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045	***No conflict.*** The project would not obstruct or interfere with agency efforts to meet this regional VMT reduction goal, including through implementation of SB 375. The project would be consistent with the SANDAG 2021 Regional Plan, which is the regional growth management strategy that targets per capita GHG reduction from passenger vehicles and light trucks in the San Diego Region pursuant to SB 375.
Light-duty Vehicle (LDV) Zero Emission Vehicles (ZEVs)	100% of LDV sales are ZEV by 2035	***No conflict.*** As this action pertains to LDV sales within California, the project would not obstruct or interfere with its implementation. Furthermore, the project would support the transition from fossil

Table 5.7-4. Project Potential to Conflict with 2022 Scoping Plan

Sector	Action	Potential to Conflict
		fuel LDV to ZEV through its provision of EV chargers.
Truck ZEVs	100% of medium-duty vehicle (MDV)/ heavy-duty vehicle (HDV) sales are ZEV by 2040	***No conflict.*** As this action pertains to MDV and HDV sales within California, the project would not obstruct or interfere with its implementation. Furthermore, the project would comply with the 2022 CALGreen code.
Electricity Generation	Sector GHG target of 38 million metric tons of carbon dioxide equivalent ($MMTCO_2e$) in 2030 and 30 $MMTCO_2e$ in 2035 Retail sales load coverage[1] 20 gigawatts (GW) of offshore wind by 2045 Meet increased demand for electrification without new fossil gas-fired resources	***No conflict***. As this action pertains to the statewide procurement of renewable energy, the project would not obstruct or interfere with its implementation.
New Residential and Commercial Buildings	All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030	***No conflict.*** The project would not obstruct or interfere with CARB's efforts to meet the all-electric appliance and heat pump goals. As designed, the project would currently involve connecting the proposed buildings to the existing natural gas infrastructure. However, the project would comply with regulations to convert to all-electric if applicable.
Construction Equipment	25% of energy demand electrified by 2030 and 75% electrified by 2045	***No conflict.*** As this action pertains to the electrification of off-road equipment across California, the project would not obstruct or interfere with its implementation. However, the project would support the action through MM-AQ-2 and MM-AQ-4, which require the use of specific electric construction equipment and cargo handling equipment, respectively.
Low Carbon Fuels for Transportation	Biomass supply is used to produce conventional and advanced biofuels, as well as hydrogen	***No conflict***. The project would not obstruct or interfere with CARB's efforts to increase the provision of low carbon fuels for transportation. The development and use of biofuels in trucks and automobiles would occur at the state and regional level. Project Design Feature (PDF) PDF-GHG-1 also includes a leasing preference for tenants with a facility owned fleet that utilizes alternative and or zero emission

Table 5.7-4. Project Potential to Conflict with 2022 Scoping Plan

Sector	Action	Potential to Conflict
		vehicles; refer to Section 4.0, Project Description.
Low Carbon Fuels for Buildings and Industry	In 2030s biomethane blended in pipeline Renewable hydrogen blended in fossil gas pipeline at 7% energy (~20% by volume), ramping up between 2030 and 2040 In 2030s, dedicated hydrogen pipelines constructed to serve certain industrial clusters	***No conflict.*** The project would not obstruct or interfere with CARB's efforts to increase the provision of low carbon fuels for use in buildings and industry. The blending of biomethane and use of renewable hydrogen in existing natural gas pipelines would happen at the scale of the utility provider and without action required by the project.
High GWP Potential Emissions	Low GWP refrigerants introduced as building electrification increases, mitigating HFC emissions	***No conflict.*** The project would not obstruct or interfere with agency efforts to introduce low GWP refrigerants. The State has established a prohibition on the sale or distribution of bulk HFCs identified as having a high GWP through SB 1206.

Source: CARB 2022a.

Based on the analysis in Table 5.7-4, the project would not conflict with the applicable strategies and measures in the 2022 Scoping Plan.

5.7.3.3 Consistency with SB 32 and 2017 Scoping Plan.

Table 5.7-5 highlights measures that have been developed under the 2017 Scoping Plan and presents the project's potential to conflict with the applicable 2017 Scoping Plan measures. The project would comply with all regulations adopted in furtherance of the Scoping Plan to the extent required by law and to the extent that they are applicable to the project.

Table 5.7-5. Project Potential to Conflict with 2017 Scoping Plan GHG Emission Reduction Strategies

Scoping Plan Measure	Measure Number	Potential to Conflict
Transportation Sector		
Advanced Clean Cars	T-1	***No conflict.*** The project would not obstruct or interfere with CARB's efforts to implement this measure because the project's employees and customers would purchase vehicles in compliance with CARB vehicle standards that are in effect at the time of vehicle purchase.
Low Carbon Fuel Standard	T-2	***No conflict.*** The project would not obstruct or interfere with CARB's Low Carbon Fuel Standard because motor vehicles driven by the Project's employees and customers would use compliant fuels.

Table 5.7-5. Project Potential to Conflict with 2017 Scoping Plan GHG Emission Reduction Strategies

Scoping Plan Measure	Measure Number	Potential to Conflict
Last-Mile Delivery	N/A	***No conflict.*** The project would not obstruct or interfere with CARB's efforts to implement this measure. Per PDF-GHG-1, leasing preference would be given to tenants with facility owned fleets that utilizes alternative and or zero emission vehicles. This measure would help to reduce GHG and air pollutant emissions associated with the last-mile of goods delivery.
Reduction in VMT	N/A	***No conflict.*** The project would not prevent CARB from implementing this measure. Additionally, the project would support this measure through siting of an employment-rich development in a housing-rich community. The provision of employment opportunities in a housing-rich area (where many of the City's residents have to leave the City for work) would help to lower the VMT per employee.
Goods Movement Efficiency Measures 1. Port Drayage Trucks 2. Transport Refrigeration Units Cold Storage Prohibition 3. Cargo Handling Equipment, Anti-Idling, Hybrid, Electrification 4. Goods Movement Systemwide Efficiency Improvements 5. Commercial Harbor Craft Maintenance and Design Efficiency 6. Clean Ships 7. Vessel Speed Reduction	T-6	***No conflict.*** The project would not prevent CARB from implementing this measure. Furthermore, per MM-AQ-4, the project would include all-electric cargo handling equipment, including yard trucks and forklifts. The project would also include anti-idling measures, including increased signage on site and training of logistic staff to reduce trucking queuing times on site per PDF-GHG-1. The project would not prevent CARB or other agencies from implementing the other measures related to Goods Movement.
Heavy-Duty Vehicle GHG Emission Reduction ▪ Tractor-Trailer GHG Regulation ▪ Heavy-Duty Greenhouse Gas Standards for New Vehicle and Engines (Phase I)	T-7	***No conflict.*** The project would not obstruct or interfere with agency efforts to implement this measure. The Tractor Trailer GHG regulation and Heavy-Duty Truck GHG standards set GHG emission standards for truck engines for a given model year. Phase I sets GHG emission and fuel economy standards for heavy-duty trucks for model years 2014–2018. Phase II sets standards for model years for 2019–2027. Over the life of the project, the truck fleet would turn over and utilize newer engines with stricter emissions standards. Additionally, as a part of PDF-GHG-1, the project would include a leasing preference for tenants that utilize a truck fleet that includes alternative/zero-emissions vehicles.
Medium and Heavy-Duty GHG Phase 2	N/A	***No conflict.*** The measure sets GHG emission and vehicle fuel standards model years 2018-

Table 5.7-5. Project Potential to Conflict with 2017 Scoping Plan GHG Emission Reduction Strategies

Scoping Plan Measure	Measure Number	Potential to Conflict
		2027 for certain trailers and model years 2021-2027 for semi-trucks, large pickup trucks, vans, and all types and sizes of buses and work trucks. Over the life of the project, the truck fleet would turn over and utilize newer engines with stricter emissions standards. Additionally, as a part of PDF-GHG-1, preference for tenants that utilize a truck fleet that includes alternative/zero-emissions vehicles.
Electricity and Natural Gas Sector		
Energy Efficiency Measures (Electricity)	E-1	***No conflict.*** The project would be constructed in accordance with the CALGreen code and Title 24 building standards. Title 24 requirements for non-residential projects include high efficiency indoor and outdoor lighting requirements, thermostat, and HVAC energy efficiency requirements, and electrical metering requirements. Additionally, per PDF-GHG-2, the project would also go beyond what is required by Title 24 building standards to include on site solar photovoltaic system that would cover 25% of the total roof area and could be expanded to 50% of the total roof area at later date.
Energy Efficiency (Natural Gas)	CR-1	***No conflict.*** The project would be constructed in accordance with the CALGreen code and Title 24 building standards.
Renewables Portfolio Standard (33% by 2020)	E-3	***No conflict.*** The project would procure electricity from SDG&E, which is in compliance with the Renewables Portfolio Standard for 2020.
Renewables Portfolio Standard (50% by 2050)	N/A	***No conflict.*** The project would procure electricity from SDG&E, which is on trajectory to be compliance with the Renewables Portfolio Standard for 2050.
Water Sector		
Water Use Efficiency	W-1	***No conflict.*** The project would be constructed in accordance with CALGreen and Title 24 building standards. The CALGreen standards require that plumbing fixtures do not exceed the established flow rates. The CALGreen standards also outline requirements for water-efficient landscaping design. Per PDF-GHG-2, the project would include a plant palette

Table 5.7-5. Project Potential to Conflict with 2017 Scoping Plan GHG Emission Reduction Strategies

Scoping Plan Measure	Measure Number	Potential to Conflict
		emphasizing drought-tolerant plants and use of water-efficient irrigation techniques.
Green Building Standards Code (Greening New Public Schools, Residential and Commercial Buildings)	GB-1	*No conflict.* The project would be constructed in accordance with CALGreen and Title 24 building standards. Title 24 requirements for non-residential projects include high efficiency indoor and outdoor lighting requirements, thermostat and HVAC energy efficiency requirements, and electrical metering requirements. Additionally, per PDF-GHG-2, the project would also go beyond what is required by Title 24 building standards to include on site solar photovoltaic system that would cover 25% of the total roof area and could be expanded to 50% of the total roof area at later date. The CALGreen standards require that plumbing fixtures do not exceed the established flow rates. The CALGreen standards also outline requirements for water efficient landscaping design. Per PDF-GHG-2, the project would include a plant palette emphasizing drought-tolerant plants and use of water-efficient irrigation techniques.

Source: CARB 2014a, 2017.
Notes: GHG = greenhouse gas; CARB = California Air Resources Board; SDG&E = San Diego Gas & Electric; VMT = vehicle miles traveled; SB = Senate Bill; N/A = not applicable; SF_6 = sulfur hexafluoride.

Based on the analysis in Table 5.7-5, the project would not conflict with the applicable strategies and measures in the 2017 Scoping Plan.

5.7.3.4 Consistency with AB 32 and 2008 Scoping Plan.

The project would not conflict with the applicable statewide regulatory programs designed to reduce GHG emissions consistent with AB 32, as described in Table 5.7-6.

Table 5.7-6. Consistency with Assembly Bill 32 Regulatory Programs

Regulatory Program	Potential to Conflict
Construction	
CARB In-Use Off-Road Regulation	*No conflict.* Off-road equipment used for construction of the project will utilize equipment in compliance with CARB Airborne Toxic Control Measures.
Mobile Sources	
California Assembly Bill 1493 (Pavley Standards)	*No conflict.* This regulatory program applies to vehicle manufacturers, and not directly to land use development. However, the vehicles operated by future occupants of and visitors to the project would

Table 5.7-6. Consistency with Assembly Bill 32 Regulatory Programs

Regulatory Program	Potential to Conflict
	benefit from and be consistent with this regulatory program in the form of reduced GHG emissions from the vehicle fleet for model years 2017 through 2025.
Advanced Clean Cars Program	***No conflict.*** This regulatory program applies to vehicle manufacturers, and not directly to land use development. However, the vehicles operated by future occupants of and visitors to the project would benefit from and be consistent with this regulatory program in the form of reduced GHG emissions from the vehicle fleet for model years 2017 through 2025.
Low Carbon Fuel Standard Regulation	***No conflict.*** This regulatory program applies to fuel suppliers, and not directly to land use development. However, the vehicles operated by future occupants of and visitors to the Project would benefit from and be consistent with this regulatory program in the form of reduced GHG emissions from the vehicle fleet.
Heavy-Duty Vehicle GHG Emission Reduction Regulation	***No conflict.*** This regulatory program is intended to reduce fuel use and GHG emissions from medium- and heavy-duty vehicles, semi-trucks, pickup trucks and vans, and all types and sizes of work trucks and buses in between. The project construction and operational analysis includes the benefit of reductions from these programs.
CARB In-Use On-Road Heavy-Duty Diesel Vehicles Regulation	***No conflict.*** This regulatory program applies to vehicle manufacturers, and not directly to land use development. However, the vehicles operated during project construction and operations would benefit from and be consistent with this regulatory program in the form of reduced GHG emissions from the vehicle fleet.
Energy Use	
California Title 20 Standards Appliance Energy Efficiency Standards	***No conflict.*** The project would result in new land use development that would be outfitted with appliances that comply with the CEC's Title 20 standards.
California Title 24, Part 6 Standards Building Energy Efficiency Standards	***No conflict.*** The project will design and construct buildings in compliance with the CEC's 2022 Title 24 standards. Title 24 requirements for non-residential projects include high efficiency indoor and outdoor lighting requirements, thermostat, and HVAC energy efficiency requirements, and electrical metering requirements. Additionally, per PDF-GHG-2, the project would also go beyond what is required by Title 24 building standards to include on site solar photovoltaic system that would cover 25% of the total roof area and could be expanded to 50% of the total roof area at later date.
California Title 24, Part 11 Standards Green Building Standards Code	***No conflict.*** The development proposed by the project would comply with the CALGreen Code. The CALGreen Code requires that plumbing fixtures do not exceed the established flow rates. The CALGreen standards also outline requirements for water efficient landscaping design. Per PDF-GHG-2, the project would include a plant palette emphasizing drought-tolerant plants and use of water-efficient irrigation techniques.
California Senate Bill X1-2 Renewable Portfolio Standards	***No conflict.*** This regulatory program applies to investor-owned utilities, electric service providers, and community choice aggregators, and not directly to land use development. However, the project would benefit from and be consistent with this regulatory because electricity would be purchased from SDG&E, which is required to procure 45% and

Table 5.7-6. Consistency with Assembly Bill 32 Regulatory Programs

Regulatory Program	Potential to Conflict
	50% of retail sales from renewable energy resources by 2027 and 2030, respectively.
Water Supply, Treatment and Distribution	
Senate Bill X7-7 Water Use Efficiency Program	*No conflict.* This regulatory program is implemented through the California Department of Water Resources and urban water suppliers, not land use developers. The project would be consistent with water conservation objectives through use of the latest water-efficiency technologies, including those relating to water-conserving plumbing fixtures, weather-sensitive irrigation controls, drought-tolerant landscaping palette.
Executive Order B-29-15	*No conflict.* Mandatory water reductions are implemented via EO B-29-15 and a regulatory framework developed by the State Water Resources Control Board. These regulatory programs apply to urban water suppliers, not land use developers. The project would be consistent with water conservation objectives through use of the latest water-efficiency technologies, including those relating to water-conserving plumbing fixtures, weather-sensitive irrigation controls, drought-tolerant landscaping palettes…
California Title 24, Part 11 Standards Green Building Standards Code	*No conflict.* The project would be required to comply with the CALGreen Code. The use of water saving design elements (such as water-efficient toilets/urinals and faucets) will allow the project to comply with the required 20% reduction in indoor potable water use.

Source: CARB 2008a.
Notes: CARB = California Air Resources Board; GHG = greenhouse gas; CEC = California Energy Commission; CALGreen = California Green Building Standards; SDG&E = San Diego Gas & Electric.

Based on the analysis in Table 5.7-6, the project would not conflict with AB 32 Regulatory Programs.

5.7.3.5 Project Potential to Conflict with SANDAG RTP/SCS

At the regional level, the SANDAG's RTP/SCS has been adopted for the purpose of reducing GHG emissions attributable to passenger vehicles in the San Diego region. In October 2015, SANDAG adopted its Regional Plan, which was subsequently updated in 2021.

The 2021 Regional Plan identifies the following ten Implementation Actions designed as specific steps taken to bring projects, polices, and programs to reality, and each one supports the 2021 Regional Plan's defined strategies.

1. Apply the Social Equity Planning Framework and ensure that equity is considered throughout 2021 Regional Plan implementation.
2. Develop Comprehensive Multimodal Corridor Plans (CMCPs) to refine 2021 Regional Plan projects at the corridor level and qualify the region for future funding opportunities.
3. Update SANDAG policies, including the TransNet Ordinance, to reflect 2021 Regional Plan projects and priorities.
4. Evaluate the transition to free public transit and develop a Value Pricing and User Fee Implementation Strategy.
5. Seek new local funding in addition to pursuing state and federal funding opportunities.

6. Advance the Next Operating System (Next OS) by preparing technical and planning studies and initiating pilot opportunities.
7. Implement the Regional Transportation Improvement Program (RTIP) and near-term projects.
8. Partner with local jurisdictions, tribal governments, agencies in Mexico, the military, and other agencies on collaborative efforts to implement the 2021 Regional Plan.
9. Expand regional programs and seek funding to fully support low-carbon transportation options, roadway safety and maintenance, habitat conservation, and nature-based climate solutions.
10. Advance a data science program to better understand travel behavior in the region, update travel demand modeling tools, and improve transparency and reporting on program effectiveness and project delivery.

Eleven policy and program areas are identified within the 2021 Regional Plan that support the ten priority Implementation Actions. These eleven policy and program areas are provided in Table 5.7-7 with analysis of the project consistency and represents the Project's potential to conflict with the SANDAG 2021 Regional Plan.

Table 5.7-7. Project Consistency with SANDAG 2021 Regional Plan

Programs, Planning, and Policies	Implementation Actions	Potential to Conflict
Land Use and Habitat	The 2021 Regional Plan vision for land use focuses on development and growth in Mobility Hub areas to preserve the region's habitat and open space while supporting transportation investments and reducing VMT. SANDAG will leverage partnerships with cities and the county through the Smart Growth Incentive Program and other grant programs to provide funds for transportation-related improvements and planning efforts that support smart growth in Mobility Hubs.	***No conflict.*** The proposed project is in a Transit Priority Area identified for 2025, 2035, and 2050 in the 2021 Regional Plan. The project is also in an identified employment center where growth should be targeted.
Housing	The 2021 Regional Plan addresses the housing crisis through Mobility Hubs, bringing locations where people live and work closer together and providing more housing options for more San Diegans through increased density. SANDAG will rely on building stronger partnerships with local jurisdictions to increase housing in the region, especially housing available to low-income residents.	***No conflict.*** The project does not include housing, however, the project is in an area identified as an employment center by the Regional Plan.
Climate Action Planning	To help reach regional and state greenhouse gas (GHG) emissions–reduction targets, the 2021 Regional Plan focuses heavily on the conversion to clean transportation and a shift from personal vehicle dependency through the 5 Big Moves. To help local jurisdictions make this transition and achieve broader reductions in GHG emissions, SANDAG will provide technical assistance, guidance resources, templates, and grant funding to incorporate the 5 Big	***No conflict.*** This action is not within the purview of this project and is instead directed towards local governments and those preparing plans for local jurisdictions. Implementation of the proposed project would not prevent SANDAG from providing the expressed guidance and resources for incorporating the 5

Table 5.7-7. Project Consistency with SANDAG 2021 Regional Plan

Programs, Planning, and Policies	Implementation Actions	Potential to Conflict
	Moves and Sustainable Communities Strategy actions into their climate action plans (CAP) and plan for more well-connected, sustainable, healthy communities that are accessible to all.	Big Moves and SCS actions into local CAPs.
Climate Adaptation and Resilience	The 2021 Regional Plan aims to better prepare San Diego communities and habitats for these climate change impacts by considering evacuation and rapid mobility needs in our transit corridors, evaluating and considering climate vulnerabilities to the region's transportation infrastructure, and using natural lands and conservation to absorb and protect against climate change impacts. SANDAG will establish a coordinated effort across agencies and local jurisdictions for a more holistic, comprehensive, equitable, sustainable, and resilient region.	***No conflict.*** The proposed project is being developed on existing underdeveloped land and will not convert any natural working lands.
Electric Vehicles	Electrification is included in the 2021 Regional Plan as a way to reach regional greenhouse gas (GHG) emission–reduction targets. Electric vehicles (EVs) are zero-emission vehicles that include plug-in battery EVs and hydrogen fuel cell EVs. SANDAG aims to incentivize and encourage the incorporation of all types of EVs into Flexible Fleets, Transit Leap, and goods movement and to support funding programs that increase the number of EVs and charging stations throughout the region and within Mobility Hubs and as part of the Complete Corridor strategy.	***No conflict.*** The Proposed Project would include electric vehicle charging infrastructure required by the most recent CalGreen standards.
Parking and Curb Management	The 2021 Regional Plan promotes policies that use land more efficiently and encourage people to consider switching from driving alone to walking, biking, taking transit, carpooling, and using shared mobility. Effective parking-management policies include reduced parking requirements, including near transit, unbundling parking from housing costs, and parking cash-out incentives for employees that commute to work without personal vehicles.	***No conflict.*** The project is located in a Transit Priority Area within 1,000 feet of the H Street Transit Station. In addition, according to SANDAG's VMT Screening Map, the project is in a VMT-efficient area.
Transportation Demand Management	Transportation Demand Management (TDM) innovations have the potential to transform the way people travel within and between communities. Managing demands on the existing transportation system is a vital	***No conflict***. The project is located in a Transportation Priority Area near the H Street Transit Station within a VMT-efficient area. The proposed project is in census

Table 5.7-7. Project Consistency with SANDAG 2021 Regional Plan

Programs, Planning, and Policies	Implementation Actions	Potential to Conflict
	strategy for making the overall system more effective in reducing drive-alone commute trips. SANDAG will continue to administer and monitor the iCommute program by providing regional rideshare, employer outreach, and bike education and secure parking services to help reduce commute-related traffic congestion and vehicle miles traveled.	tract 12600. The SANDAG average VMT per employee is 18.90 and the threshold of 85 percent would be 16.06 VMT per employee or below. The average VMT per employee of this tract is 15.91, which is below the regional average VMT per employee of 18.90 as well as below the VMT per employee threshold (i.e. 85 percent of the reginal mean) of 16.06.
Vision Zero	Vision Zero is a national campaign to eliminate all traffic-related deaths and serious injuries by focusing on policies and the redesign of streets to create a transportation system that is safe for everyone. In adopting Vision Zero, SANDAG will work toward Zero by collecting and analyzing crash data to identify safety issues and recommend solutions; developing a regional safety policy; continuing to construct the Regional Bike Network; working with local jurisdictions to conduct outreach for and build out their complete streets networks; and funding educational programs, including opportunities to collaborate with tribal nations.	*No conflict.* This action is not within the purview of this project and is instead directed towards SANDAG to prepare and implement a regional safety policy and to coordinate with local jurisdictions to provide resources and assistance on safe roadway design. Implementation of the proposed project would not prevent SANDAG from providing the expressed guidance and resources for Vision Zero planning efforts.
Fix It First	To optimize investments in the region's transportation infrastructure, the Regional Plan and the 5 Big Moves focus on improving upon existing roads, rails, and sidewalks. The Fix It First strategy aims to repair existing roads and create a system for sustained maintenance in the future, creating a safe and efficient transportation network for all users.	*No conflict.* This action is not within the purview of this Project and is instead aimed at repair and maintenance of the regional transportation system. Implementation of the Proposed Project would not prevent SANDAG from improving the existing roads, rails, and sidewalks.
Transportation System Management and Operations	Transportation System Management and Operations (TSMO) employs a series of intelligent transportation system strategies designed to maximize the capacity and efficiency of the existing and future transportation system. TSMO includes the establishment of institutional and governance actions to help advance and facilitate cross-agency collaboration to ensure existing and proposed transportation systems are not operated or managed as	*No conflict.* This action is not within the purview of this project and is instead directed towards SANDAG to develop the TSMO through cross-agency collaboration. Implementation of the proposed project would not prevent SANDAG from employing the strategies in support of TSMO and multimodal transportation system.

Table 5.7-7. Project Consistency with SANDAG 2021 Regional Plan

Programs, Planning, and Policies	Implementation Actions	Potential to Conflict
	independent systems but as a multimodal transportation system.	
Value Pricing and User Fees	The 2021 Regional Plan incorporates a variety of value pricing and user fee strategies as tools to improve mobility by encouraging changes in travel behaviors while generating revenue to address aging infrastructure and expand travel options. These strategies include a network of Managed Lanes, a mileage-based road usage charge, a fee on the fares charged for rides provided by transportation network companies, and further subsidization of transit fares.	***No conflict.*** This action is not within the purview of this project and is instead directed towards SANDAG to develop and implement pricing and fee strategies. Implementation of the Proposed Project would not prevent SANDAG from designing fee structures and other pricing tools to support infrastructure and expansion of travel options.

Source: SANDAG 2021.

As shown in Table 3-7, the project would not conflict with actions from the SANDAG 2021 Regional Plan.

5.7.3.6 Project Potential to Conflict with City of Chula Vista General Plan

The proposed project would amend the General Plan to change the land use designation on the project site from Industrial (I) to Rohr Wohl Specific Plan; allowed uses on site would be governed by the Specific Plan. The General Plan is the primary source of long-range planning and policy direction that is used to guide development within the City and serves as a policy guide for determining the appropriate physical development and character of Chula Vista. While specific plans are not required to rigidly conform to the City's General Plan, they must demonstrate consistency with the goals and policies set forth in the General Plan to demonstrate that the specific plan and General Plan are in general harmony. The Specific Plan has been prepared in conformance with the goals and policies of the City of Chula Vista General Plan as amended, in providing a commercial/light Industrial use on an underutilized property, creating new employment opportunities, and providing regulations that support the success of an employment area of the City.

Table 5.7-8 provides a summary of applicable policies and the project's potential to conflict with those policies.

Table 5.7-8. Project Consistency with the City of Chula Vista General Plan

Policy	Potential to Conflict
Environmental Element	
Objective E-6. Improve local air quality and reduce greenhouse gas emissions by minimizing the release of air pollutants and toxic air contaminants and limiting the exposure of people to such pollutants.	
Policies E 6.1: Encourage compact development featuring a mix of uses that locate residential areas within reasonable walking distance to jobs, services, and transit.	***No conflict.*** The project is located on an existing developed site near transit in a transportation planning area and VMT-efficient area.

Table 5.7-8. Project Consistency with the City of Chula Vista General Plan

Policy	Potential to Conflict
Policy E 6.2: Promote and facilitate transit system improvements in order to increase transit-use and reduce dependency on the automobile.	***No conflict.*** This action is not within the purview of this project and is instead directed towards the City to implement.
Policy E 6.3: Facilitate the use of alternative fuel and low- and zero-emission vehicles and equipment in the community.	***No conflict. No conflict.*** This is a City-wide measure, however the project would not impede the City's efforts to facilitate the use of alternative fuel and low- and zero-emission vehicles and equipment in the community. The project includes PDF-GHG-1 which includes a leasing preference for tenants with a facility owned fleet that utilizes alternative and or zero emission vehicles; refer to Section 4.0, Project Description. Additionally, Mitigation Measure AQ-4 requires the use of zero-emission cargo handling equipment.
Policy E 6.4: Do not site new or re-powered fossil-fueled baseload or peaking-type Electric-Generating Facilities and other major toxic emitters within 1,000 feet of sensitive receptors, or site sensitive receptors within 1,000 feet of such facilities	***Not applicable.*** The project does not include Electric-Generating Facilities and is not a major toxic emitter. The Health Risk Assessment prepared for the project resulted in the incorporation of Mitigation Measures AQ-4, AQ-5, and AQ-6, which require the use of zero-emission cargo handling equipment, the cleanest tier of emergency generators, and truck requirements, respectively that serve to reduce toxic air contaminants in the form of diesel particulate matter. With the incorporation of mitigation, the project does not result in a significant impact to sensitive receptors.
Policy E 6.5: Ensure Electrical Generating Facilities incorporate cleaner fuel sources and least-polluting technologies in order to help transition the City to a less fossil fuel dependent future, while meeting Chula Vista's energy demand.	***Not applicable.*** The project does not include Electric-Generating Facilities.
Policy E 6.6: Explore incentives to promote voluntary air pollutant reductions, including incentives for developers who go above and beyond applicable requirements and for facilities and operations that are not otherwise regulated.	**No conflict.** This action is not within the purview of this project and is instead directed towards the City to implement.
Policy E 6.7: Encourage innovative energy conservation practices and air quality improvements in new development and redevelopment projects consistent with the City's Air Quality Improvement Plan Guidelines or its equivalent, pursuant to the City's Growth Management Program	***No conflict.*** This action is not within the purview of this project and is instead directed towards the City to implement.
Policy E 6.8: Encourage climate resilient design techniques in new buildings and infrastructure to reduce future risks from climate change-related impacts such as wildfires, extreme heat, and flooding.	***No conflict.*** This action is not within the purview of this project and is instead directed towards the City to implement.
Policy E 6.9: Discourage the use of landscaping equipment powered by two-stroke gasoline engines within the City and promote less-polluting alternatives to their use.	***No conflict.*** This action is not within the purview of this project and is instead directed towards the City to implement.

Table 5.7-8. Project Consistency with the City of Chula Vista General Plan

Policy	Potential to Conflict
Policy E 6.10: The siting of new sensitive receivers within 500 feet of highways resulting from development or redevelopment projects shall require the preparation of a health risk assessment as part of the CEQA review of the project. Attendant health risks identified in the Health Risk Assessment (HRA) shall be feasibly mitigated to the maximum extent practicable, in accordance with CEQA, in order to help ensure that applicable federal and state standards are not exceeded.	***Not applicable.*** The project does not include the siting of new sensitive receptors. The Health Risk Assessment prepared for the project resulted in the incorporation of Mitigation Measures AQ-4, AQ-5, and AQ-6, which require the use of zero-emission cargo handling equipment, the cleanest tier of emergency generators, and truck requirements, respectively that serve to reduce toxic air contaminants in the form of diesel particulate matter. With the incorporation of mitigation, the project does not result in a significant impact to sensitive receptors.
Policy E 6.11: Develop strategies to minimize CO hot spots that address all modes of transportation.	***No conflict.*** This action is not within the purview of this project and is instead directed towards the City to implement. The project was evaluated for potential to cause a hotspot and was determined to not result in a significant impact.
Policy E 6.12: Promote clean fuel sources that help reduce the exposure of sensitive uses to pollutants	***No conflict.*** This action is not within the purview of this project and is instead directed towards the City to implement.
Policy E 6.13: Encourage programs and infrastructure to increase the availability and usage of energy-efficient vehicles, such as hybrid electric vehicles, electric vehicles, or those that run on alternative fuels.	***No conflict.*** This action is not within the purview of this project and is instead directed towards the City to implement.
Policy E 6.14: Transition the City fleet to 100% “clean” vehicles by integrating hybrid and alternative fuel vehicles as current municipal fleet vehicles are replaced	***No conflict.*** This action is not within the purview of this project and is instead directed towards the City to implement.
Policy E 6.15: Site industries: and other stationary emitters in a way that minimizes the potential impacts of poor air quality on homes, schools, hospitals, and other land uses where people congregate, and disadvantaged populations.	***No conflict.*** The project location was previously used for industrial uses. There are existing residences located within 500 feet of the project’s eastern boundaries. A Health Risk Assessment was prepared for the project and resulted in the incorporation of Mitigation Measures AQ-4, AQ-5, and AQ-6, which require the use of zero-emission cargo handling equipment, the cleanest tier of emergency generators, and truck requirements, respectively that serve to reduce toxic air contaminants in the form of diesel particulate matter. With the incorporation of mitigation, the project does not result in a significant impact to sensitive receptors.
Policy E 6.16: Encourage the use of bicycles through support of bike share opportunities, community bike programs, and the provision of bicycle parking opportunities such as bike racks and bike lockers	***No conflict.*** This action is not within the purview of this project and is instead directed towards the City to implement.

Table 5.7-8. Project Consistency with the City of Chula Vista General Plan

Policy	Potential to Conflict
Objective E-6B. Prioritize greening efforts to keep air, water, and land clean.	
Policy E 6B.1: Protect and develop shade tree cover along streets and within parking lots as a priority, particularly in new developments or tree-deficient areas.	***No conflict.*** This action is not within the purview of this project and is instead directed towards the City to implement.
Policy E 6B.2: Preferentially plant female street trees to reduce pollen, especially in the most populated areas.	***No conflict.*** This action is not within the purview of this project and is instead directed towards the City to implement.
Policy E 6B.3: Prioritize natural filtration, as opposed to impermeable hardscaping, within new development projects, along roadways, and adjacent to stream and riverbanks.	***No conflict.*** This action is not within the purview of this project and is instead directed towards the City to implement.
Policy E 6B.4: Update the building code to support best practices in "green building" design, construction, and operations.	***No conflict.*** This action is not within the purview of this project and is instead directed towards the City to implement.
Policy E 6B.5: Provide fast-track permitting for projects that implement "green building" design and construction.	***No conflict.*** This action is not within the purview of this project and is instead directed towards the City to implement.
Policy E 6B.6: Encourage or require all new building construction to incorporate green roofs and encourage conversions of existing roof space to green roofs to reduce heat island effect.	***No conflict.*** This action is not within the purview of this project and is instead directed towards the City to implement.
Objective E-. 7 Promote energy conservation through the efficient use of energy and through the development of local, non-fossil fuel-based renewable sources of energy	
Policy E 7.1: Promote development of regulations and building design standards that maximize energy efficiency through appropriate site and building design and through the use of energy-efficient materials, equipment, and appliances.	***No conflict.*** This action is not within the purview of this project and is instead directed towards the City to implement.
Policy E 7.2: Encourage and support the local research, development, generation, and use of non-fossil, fuel-based renewable sources of energy, including wind and solar resources, that meet local energy needs in an environmentally sensitive manner and reduce dependence on imported energy.	***No conflict.*** This action is not within the purview of this project and is instead directed towards the City to implement.
Policy E 7.3: Develop and provide pertinent information about the benefits of energy conservation and available energy conservation incentive programs to all segments of the community.	***No conflict.*** This action is not within the purview of this project and is instead directed towards the City to implement.
Policy E 7.4: Pursue and encourage the expansion of local energy conservation, energy efficiency, and related incentive programs.	***No conflict.*** This action is not within the purview of this project and is instead directed towards the City to implement.
Policy E 7.5: Pursue 40% City-wide electricity supply from clean, renewable resources by 2017.	***No conflict.*** This action is not within the purview of this project and is instead directed towards the City to implement.

Table 5.7-8. Project Consistency with the City of Chula Vista General Plan

Policy	Potential to Conflict
Policy E 7.6: Encourage the construction and operation of green buildings, considering such programs as the Leadership in Energy and Environmental Design (LEEDTM) Green Building Rating System	***No conflict.*** This action is not within the purview of this project and is instead directed towards the City to implement.
Policy E 7.7: Support tree planting programs that will be implemented to reduce energy needs.	***No conflict.*** This action is not within the purview of this project and is instead directed towards the City to implement.
Policy E 7.8: Ensure that residential and non-residential construction complies with all applicable City of Chula Vista energy efficiency measures and other green building measures that are in effect at the time of discretionary permit review and Approval or building permit issuance, whichever is applicable.	***No conflict.*** This action is not within the purview of this project and is instead directed towards the City to implement. The project will comply with applicable regulations.
Objective E-. 8. Minimize the amount of solid waste generated within the General Plan area that requires landfill disposal.	
Policy E 8.1: Promote efforts to reduce waste, minimize the need for additional landfills, and provide economically and environmentally sound resource recovery, management, and disposal facilities.	***No conflict.*** This action is not within the purview of this project and is instead directed towards the City to implement.
Policy E 8.2: Support the development of composting programs for commercial and residential development.	***No conflict.*** This action is not within the purview of this project and is instead directed towards the City to implement.
Policy E 8.3: Implement source reduction strategies, including curbside recycling, use of small collection facilities for recycling, and composting.	***No conflict.*** This action is not within the purview of this project and is instead directed towards the City to implement.
Policy E 8.4: Provide information about applicable solid waste reduction programs to all segments of the community, including other governmental institutions.	***No conflict.*** This action is not within the purview of this project and is instead directed towards the City to implement.
Policy E 8.5: Encourage the reduction of household hazardous waste generation and disposal by promoting the use of safe substitutes, and by promoting and facilitating recycling of household hazardous waste.	***No conflict.*** This action is not within the purview of this project and is instead directed towards the City to implement.
Policy E 8.6: Permit recycling operations and businesses that utilize recyclable materials within industrial zones in close proximity to Otay Landfill, subject to conformance with applicable SPA Plan-level policies and zoning regulations.	***No conflict.*** This action is not within the purview of this project and is instead directed towards the City to implement.

Source: City of Chula Vista 2005

Based on the preceding information, the project would not conflict with applicable General Plan Policies.

5.7.3.7 Quantification of GHG Emissions

Information contained in this section is based on the assumptions and methodology included in Appendix C, specifically Section 2.3.3 and Section 3.3.2. The quantification of emissions is shown in Table 3-9 of Appendix C.

Construction of the Project would result in GHG emissions, which are primarily associated with the use of off-road construction equipment, haul trucks, on-road vendor trucks, and worker vehicles.

Construction Emissions

Construction of the Project would result in GHG emissions, which are primarily associated with the use of off-road construction equipment, haul trucks, on-road vendor trucks, and worker vehicles.

CalEEMod 2022 was used to calculate the annual GHG emissions based on the construction scenario described above. Construction of the project is anticipated to commence in August 2024 for Planning Area B-1 and would be completed in October 2026. Planning Area B-2 is anticipated to begin construction in August 2028 and be completed in September 2029. On-site sources of GHG emissions include off-road equipment and off-site sources including vendor trucks and worker vehicles. Table 5.7-9 presents construction emissions for the project in 2024 through 2029 from on-site and off-site emission sources.

Table 5.7-9. Estimated Annual Construction Greenhouse Gas Emissions

Year	CO_2	CH_4	N_2O	R	CO_2e
	Metric Tons per Year				
2024	514.19	0.02	0.04	0.31	527.74
2025	713.83	0.03	0.04	0.62	728.09
2026	402.46	0.02	0.02	0.31	410.14
2028	365.93	0.01	0.03	0.27	374.14
2029	538.36	0.02	0.04	0.37	550.61
				Total	**2,590.72**
				Amortized 30-Year Construction Emissions	*86.36*

Source: CalEEMod 2022.
Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; R = refrigerant; CO_2e = carbon dioxide equivalent; <0.01 = reported value less than 0.01. Totals may not add due to rounding. See Appendix C for complete results. Values shown are the mitigated emissions from implementation of MM-AQ-2 and MM-AQ-3.

As shown in Table 5.7-9, the estimated total GHG emissions during construction of would be approximately 2,590.72 MT CO_2e over the construction period. Because construction emissions represent short-term impacts, regulatory agencies often provide guidance to amortize the construction emissions over the life of the project to distribute the construction emissions over a longer timeframe (CAEP 2016; SCAQMD 2008). Thirty years is often considered a reasonable estimate of the useful lifespan of many types of development projects. Estimated project-generated construction emissions amortized over 30 years would be 83.36 MT CO_2e per year. As with project-generated construction criteria air pollutant emissions, GHG emissions generated during construction of the project would be short-term in nature, lasting only for the duration of the construction period, and would not represent a long-term source of GHG emissions.

Operational Emissions

Information contained in this section is based on the assumptions and methodology included in Appendix C, specifically Section 2.3.3 and Section 3.3.2. The quantification of emissions is shown in Table 3-10 of Appendix C.

Operation of the project would generate GHG emissions through vehicle trips by residents, employees, customers, and visitors to and from the project site; landscape maintenance equipment operation; energy use (generation of electricity consumed by the project); solid waste disposal; generation of electricity associated with water supply,

treatment, and distribution and wastewater treatment; and refrigerants. CalEEMod was used to calculate the annual GHG emissions based on the operational assumptions described above. The estimated operational project-generated GHG emissions from area sources, energy usage, motor vehicles, solid waste generation, and water usage and wastewater generation are shown in Table 5.7-10.

Table 5.7-10. Estimated Annual Operational Greenhouse Gas Emissions

Source	CO_2	CH_4	N_2O	R	CO_2e
	metric tons per year				
Project					
Mobile	17,704.90	0.67	1.29	16.05	18,121.81
Area	13.99	0.00	0.00	—	14.04
Energy	3,590.87	0.49	0.04	0	3,615.82
Water	144.37	5.54	0.13	0	322.69
Waste	85.39	8.53	0.00	0	298.75
Refrigeration	0	0	0	2,183.79	2,183.79
Offroad (forklifts, yard trucks)	0	0	0	0	0
Stationary (Emergency Generators)	47.60	0.00	0.00	0.00	47.76
Subtotal	*21.587.12*	*15.24*	*1.47*	*2,199.84*	*24,604.66*
Existing					
Mobile	3,525.74	0.20	0.16	6.56	3,584.87
Area	14.57	0.00	0.00	—	14.63
Energy	4,121.47	0.30	0.02	—	4,135.12
Water	457.95	7.53	0.18	—	700.24
Waste	104.23	10.42	0.00	—	364.68
Refrigeration	—	—	—	33.05	33.05
Offroad (forklifts, yard trucks)	1,430.18	0.06	0.01	—	1,435.09
Stationary (Emergency Generators)	0	0	0	0	0
Subtotal	*9,654.15*	*18.51*	*0.37*	*39.61*	*10,267.67*
Net					
Mobile	14,179.16	0.47	1.13	9.49	14,536.94
Area	-0.58	0	0	0	-0.59
Energy	-530.60	0.19	0.02	0.00	-519.30
Water	-313.58	-1.99	-0.05	0	-377.55
Waste	-18.84	-1.89	0	0	-65.93
Refrigeration	0	0	0	2150.74	2150.74
Offroad (forklifts, yard trucks)	-1,430.18	-0.06	-0.01	0.00	-1,435.09
Stationary (Emergency Generators)	47.6	0	0	0	47.76
Total	**11,932.98**	**-3.28**	**1.09**	**2,160.23**	**14,336.98**
			Amortized 30-Year Construction Emissions		*86.36*
			Project Operations + Amortized Construction Total		**14,423.34**

Source: CalEEMod 2022. Appendix C.

Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; R= refrigerant; CO_2e = carbon dioxide equivalent; <0.01 = reported value less than 0.01. Values shown are the mitigated emissions from implementation of MM-AQ-4, MM-AQ-5, and MM-AQ-6.
See Appendix C for complete results. Numbers may not add due to rounding.
The project does not include mitigation measures, but includes Project Design Features for GHGs, which are reflected as "mitigation in CalEEmod", as such, please see Rohr-Wohl Specific Plan – Regional – Mitigated Operational Detailed Report.pdf in Appendix C for complete results.

As shown in Table 5.7-10, estimated annual project generated GHG emissions would be approximately 14,336.98 MT CO_2e per year; with amortized construction emissions of approximately 86.36 MT CO_2e per year, total project emissions would be approximately 14,423.34 MT CO_2e per year. The City's most recent GHG inventory showed that the City had 1.098 million MT CO_2e in 2020 (City of Chula Vista 2022). The project's emissions would represent 1.3% of the 2020 inventory. The 2020 GHG Inventory report indicates that the community GHG emissions have decreased by 17% compared to the 2005 baseline (the farthest back year with comparable data). These reductions are even more significant when considering the 25% increase in population over this same period (City of Chula Vista 2022). The City is in the process of preparing its fourth CAP through its 2024 Climate Action Plan Update (CAP Update). The 2024 CAP Update will continue to build on the City's previous successes and set targets for achieving its 2030 target of 57% below 2018 and net zero by 2045. The project would assist in the City's goals by complying with applicable strategies as they developed and implemented through the CAP Update. The CAP Update is anticipated to be approved by the third quarter of 2025.

As discussed above, the project's significance is based on its potential to conflict with the applicable plans adopted for the purpose of reducing GHG emissions, including the City's CAP, the 2022 Scoping Plan, the 2017 Scoping Plan, AB 32 Regulations, SANDAG's RTP/SCS and the City's General Plan. As shown in the above tables, the project would not conflict with applicable GHG reduction plans and regulations, accordingly, the impact would be **less than significant**.

5.7.4 Level of Significance Prior to Mitigation

The proposed project would result in **less than significant** impacts as it relates to GHG emissions.

5.7.5 Mitigation Measures

No mitigation measures are required.

5.7.6 Level of Significance After Mitigation

The proposed project would result in **less than significant** impacts related to GHG emissions and no mitigation measures are required.

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5.8 Hazards and Hazardous Materials

The project site consists of 11 assessor parcels and is divided into three separate planning areas, including Planning Areas A, B-1, and B-2. The eastern portion of the project site, closest to I-5 (between G Street and H Street), is designated as Planning Area A and is 9.29 acres (Figure 4-2, Site Plan). The largest planning area is Planning Area B-1, totaling 26.13 acres. Planning Area B-2, which is located south of B-1, totals 9.36 acres.

This section describes the existing hazardous materials conditions of the project site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed project. The information provided is based in part on the following documents, included as appendices to this environmental impact report (EIR).

- Appendix H-1 Phase I Environmental Site Assessment, Parcel A and Land Parcels, completed by Partner Engineering and Science, Inc., March 2023
- Appendix H-2 Phase I Environmental Site Assessment, Parcel B – Rohr Inc., a Collins Aerospace Company, completed by Partner Engineering and Science, Inc., February 2021
- Appendix H-3 Cleanup and Abatement Order No. R9-2021-0042, An Order Directing Rohr and Goodrich Corporation to Clean Up or Abate the Effects of Waste Discharged from the Rohr/Goodrich North Campus Property, Chula Vista, San Diego County, completed by San Diego Regional Water Quality Control Board, July 2021

5.8.1 Existing Conditions

5.8.1.1 Regulatory Framework

Federal

Federal Toxic Substances Control Act of 1976

The Federal Toxic Substances Control Act of 1976 tasked the U.S. Environmental Protection Agency (EPA) with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. The Federal Toxic Substances Control Act addresses the production, importation, use, and disposal of specific chemicals including polychlorinated biphenyls (PCBs), asbestos, radon, and lead-based paint.

Resource Conservation and Recovery Act

The objectives of the Resource Conservation and Recovery Act (RCRA) of 1976 are to protect human health and the environment from the potential hazards of waste disposal, conserve energy and natural resources, reduce the amount of waste generated, and ensure that wastes are managed in an environmentally sound manner. RCRA affirmed and extended the "cradle-to-grave" system of regulating hazardous wastes. The use of certain techniques for the disposal of some hazardous wastes was specifically prohibited by the Hazardous and Solid Waste Act. The Hazardous and Solid Waste Amendments of 1984 also added Subtitle I, which governs underground storage tanks.

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as "Superfund," was enacted by Congress on December 11, 1980. This law provided broad federal authority to

respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA established requirements concerning closed and abandoned hazardous waste sites, provided for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified. CERCLA also enabled the revision of the National Contingency Plan, which provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The National Contingency Plan also established the National Priorities List, which is a list of contaminated sites warranting further investigation by EPA. CERCLA was amended by the Superfund Amendments and Reauthorization Act on October 17, 1986.

Chemical Accident Prevention Provisions (Risk Management Plan)

Code of Federal Regulations Title 40 Part 68, Chemical Accident Prevention Provisions, outlines the rules and requirements for regulated substances and thresholds of those substances. Owners and operators of stationary source[1] facilities that store and handle over the threshold quantity of regulated substances, as identified in Table 1 of 40 CFR Section 68.130, List of Regulated Toxic Substances and Threshold Quantities for Accidental Release Prevention, are required to implement accidental release prevention measures. This includes preparation of a Risk Management Plan (RMP), as described in 40 CFR Sections 68.150 through 68.185. The RMP would include management systems, hazards assessments, prevention programs, and emergency response procedures associated with the applicable regulated substances.

National Primary Drinking Water Regulations

The National Primary Drinking Water Regulations are legally enforceable primary standards and treatment techniques that apply to public water systems. Primary standards and treatment techniques protect public health by limiting the levels of contaminants in drinking water. The EPA sets legal limits on over 90 contaminants in drinking water. The legal limit for a contaminant (maximum contaminant level [MCL]) reflects the level that protects human health and that water systems can achieve using the best available technology. EPA rules also set water-testing schedules and methods that water systems must follow. The Safe Drinking Water Act gives individual states the opportunity to set and enforce their own drinking water standards if the standards are at a minimum as stringent as EPA's national standards.

Hazardous Materials Transportation Act

The U.S. Department of Transportation regulates hazardous materials transportation between states under the Code of Federal Regulations, Title 49, Chapter 1, Parts 100–185. In California, the California Department of Transportation (Caltrans) and the California Highway Patrol (CHP) enforce federal law related to the transport of hazardous materials. Together, these agencies determine driver training requirements, load labelling procedures, and specifications for container types.

Occupational Safety and Health Act

The Occupational Safety and Health Administration (OSHA) is responsible at the federal level for supporting worker safety. OSHA sets federal standards for implementing workplace training, exposure limits, and safety procedures

[1] Stationary source is defined in 40 CFR 68.3, Definitions, and means any buildings, structures, equipment, installations, or substance emitting stationary activities which belong to the same industrial group, which are located on one or more contiguous properties, which are under the control of the same person (or persons under common control), and from which an accidental release may occur. See Chapter 5.2, Air Quality, for more information regarding stationary emission sources.

for the handling of hazardous substances and hazardous materials (as well as other hazards). OSHA also establishes criteria by which each state can implement its own health and safety program.

Title 29 USC, Part 1926 et seq. requires employee training; personal protective equipment; safety equipment; and written procedures, programs, and plans for supporting worker safety when working with hazardous materials or in hazardous work environments during construction activities, including renovations and demolition projects and the handling, storage, and use of explosives. These standards also provide rules for the removal and disposal of asbestos, lead, lead-based paint, and other lead materials. Although intended primarily to protect worker health and safety, these requirements also guide general facility safety. This regulation also requires that an engineering survey is prepared prior to demolition.

Title 29 USC, Part 1910 et seq. requires facilities that use, store, manufacture, handle, process, or move hazardous materials to conduct employee safety training; inventory safety equipment relevant to potential hazards; have knowledge on safety equipment use; prepare an illness prevention program; provide hazardous substance exposure warnings; prepare an emergency response plan; and prepare a fire prevention plan.

Universal Wastes

Title 40 USC, Chapter 1, Subchapter I, Part 273 governs the collection and management of widely generated waste, including batteries, pesticides, mercury-containing equipment, and bulbs. This regulation streamlines the hazardous waste management standards and allows that such waste is diverted to the appropriate treatment or recycling facility.

Oil Pollution Prevention

Oil Pollution Prevention regulations, Title 40 USC, Chapter 1, Subchapter D, Part 112, require the preparation of a spill prevention, control, and countermeasure (SPCC) Plan if oil is stored in excess of 10,000 gallons in aboveground storage (total on-site). SPCC regulations place restrictions on the management of petroleum materials and, therefore, have some bearing on hazardous materials management.

International Fire Code

The International Fire Code (IFC), created by the International Code Council, is the primary means for authorizing and enforcing procedures and mechanisms to support the safe handling and storage of any substance that may pose a threat to public health and safety. The IFC regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. The IFC and the International Building Code use a hazard classification system to determine what measures are required to protect against structural fires. These measures may include construction standards, separations from property lines, and specialized equipment. To support that these safety measures are met, IFC employs a permit system based on hazard classification. The IFC is updated every 3 years.

Federal Response Plan

The Federal Response Plan of 1999 is a signed agreement among 27 federal departments and agencies, including the American Red Cross, that (1) provides the mechanism for coordinating delivery of federal assistance and resources to augment efforts of state and local governments overwhelmed by a major disaster or emergency; (2) supports implementation of the Robert T. Stafford Disaster Relief and Emergency Act, as well as individual agency statutory authorities; and (3) supplements other federal emergency operations plans developed to address specific hazards. The Federal Response Plan is implemented in anticipation of a significant event likely to result in a need

for federal assistance or in response to an actual event requiring federal assistance under a presidential declaration of a major disaster or emergency.

FEMA Hazard Mitigation Plan

Federal law (Disaster Management Act 2000) requires that, in order to remain eligible for post-disaster federal Emergency Management Agency (FEMA) funding after November 2004, every jurisdiction in the United States must have an approved Hazard Mitigation Plan (HAZMIT plan) to address the management of, and response to, emergency situations. In addition, to be eligible for pre-disaster FEMA funding for use in hazard mitigation, each jurisdiction's approved HAZMIT Plan must include the planned uses of those funds. The City of Chula Vista adopted a HAZMIT Plan in May 2004 (City of Chula Vista 2004) to help mitigate impacts to the City in the event of a natural or man-made disaster. The City's HAZMIT Plan was included in the San Diego County Multi-Jurisdictional HAZMIT Plan, submitted to FEMA for approval in compliance with federal law.

Federal Aviation Administration

The Federal Aviation Administration (FAA) has primary responsibility for the safety of civil aviation. Title 14 USC, Chapter 1, Subchapter E, Part 77 establishes requirements for notifying the FAA of certain construction activities and alterations to existing structures, in order to ensure there are no obstructions to navigable airspace. For example, projects that include construction or alteration exceeding 200 feet in height above ground level are required to notify the FAA.

International Wildland-Urban Interface Code

The International Wildland-Urban Interface Code establishes requirements for land use and the build environment within designated wildland-urban interface areas, using prescriptive and performance provisions. This code establishes minimum special regulations for the safeguarding of life and property from the intrusion of wildfire, including: 1) regulating ignition-resistant construction techniques and defensible space, as well as fire department access and available water supplies for fire suppression, 2) focusing on preventing ignition of buildings and vegetative fuels from direct exposure to wildfire and fire exposure from adjacent structures, and 3) helping prevent structure fires in the wildland-urban interface from spreading to wildland fuels, even in the absence of fire department intervention.

State

Certified Unified Program

The California Environmental Protection Agency (CalEPA) implements and enforces a statewide hazardous materials program known as the Certified Unified Program, established by Senate Bill 1802 to consolidate, coordinate, and make consistent the administrative requirements, permits, inspections, and enforcement activities for the following environmental and emergency management programs for hazardous materials:

- Hazardous Materials Release Response Plans and Inventories (Hazardous Materials Business Plans)
- California Accidental Release Prevention Program
- Underground Storage Tank Program
- Aboveground Petroleum Storage Act Requirements for Spill Prevention, Control, and Countermeasure Plans
- Hazardous Waste Generator and On-Site Hazardous Waste Treatment Programs

- California Uniform Fire Code, Hazardous Materials Management Plans, and Hazardous Material Inventory Statements

CalEPA certifies local government agencies as Certified Unified Program Agencies (CUPAs) to implement hazardous waste and materials standards. San Diego County Department of Environmental Health and Quality, Hazardous Materials Division, is designated as the local CUPA in Chula Vista and would facilitate hazardous material and hazardous waste permitting for the proposed project.

Title 19 CCR, Chapter 2, Subchapter 3, Sections 2729-2734/California HSC Division 20, Chapter 6.95, Sections 25500-25520 requires the preparation of a hazardous materials business plan (HMBP) by facility operators. The HMBP identifies the hazards, storage locations, and storage quantities for each hazardous chemical stored on-site. The HMBP is submitted to the CUPA for emergency planning purposes.

Cortese List

California Government Code Section 65962.5 requires that information regarding environmental impacts of hazardous substances and wastes be maintained and provided at least annually to the Secretary for Environmental Protection. Commonly referred to as the Cortese List, this information must include the following: sites impacted by hazardous wastes; public drinking water wells that contain detectable levels of contamination; underground storage tanks (USTs) with unauthorized releases; solid waste disposal facilities from which there is migration of hazardous wastes; and all cease and desist and cleanup and abatement orders. This information is maintained by various agencies, including the California Department of Toxic Substances Control (DTSC), the State Department of Health Services, State Water Resources Control Board (SWRCB), and the local CUPA. Each of the agencies has their own databases/records; thus, the Cortese List is not just a single list.

Regional Screening Levels

In California, the Department of Toxic Substances Control (DTSC) Human and Ecological Risk Office (HERO) incorporated the EPA Regional Screening Levels (RSLs) into the HERO Human Health Risk Assessment (HHRA). HERO created HHRA Note 3, which incorporates HERO recommendations and DTSC-modified screening levels based on review of the EPA RSLs. The DTSC-modified screening level should be used in conjunction with the EPA RSLs to evaluate chemical concentrations in environmental media at California sites and facilities.

Environmental Screening Levels

Environmental Screening Levels (ESLs) provide conservative screening levels for over 100 chemicals found at sites with contaminated soil and groundwater. ESLs are intended to help expedite the identification and evaluation of potential environmental concerns at contaminated sites. The ESLs were developed by the San Francisco Bay Regional Water Quality Control Board (RWQCB); however, they are used throughout the state. While ESLs are not intended to establish policy or regulation, they can be used as a conservative screening level for sites with contamination. Other agencies in California currently use the ESLs (as opposed to RSLs). In general, the ESLs could be used at any site in the State of California, provided all stakeholders agree. Recently, regulatory agencies in various regions use ESLs as regulatory cleanup levels. The ESLs are not generally used at sites where the contamination is solely related to a leaking underground storage tanks; those sites are instead subject to the Low-Threat Underground Storage Tank Closure Policy.

California Hazardous Waste Control Law

California Health and Safety Code Division 20, Chapter 6.5 establishes regulations to protect the public health and the environment by assisting generators of hazardous waste in meeting the responsibility for the safe disposal of hazardous waste. The California Hazardous Waste Control Law is administered by CalEPA and pertains to administering a state hazardous waste program in lieu of the federal RCRA program, pursuant to Section 3006 of Public Law 94-580, as amended. The Hazardous Waste Control Law lists 791 chemicals and approximately 300 common materials that may be hazardous; establishes criteria for identifying, packaging, and labeling hazardous wastes; prescribes management controls; establishes permit requirements for treatment, storage, disposal, and transportation; and identifies some wastes that cannot be disposed of in landfills.

Title 22 CCR, Division 4.5 denotes the DTSC regulates hazardous wastes. These regulations establish requirements for the management and disposal of hazardous waste in accordance with the provisions of the California Hazardous Waste Control Act and federal RCRA. As with federal requirements, waste generators must determine if their wastes are hazardous according to specified characteristics or lists of wastes. Hazardous waste generators must obtain identification numbers; prepare manifests before transporting waste off-site; and use only permitted treatment, storage, and disposal facilities. Standards also include requirements for record-keeping, reporting, packaging, and labeling. Additionally, while not a federal requirement, California requires that hazardous waste be transported by registered hazardous waste transporters.

In addition, Chapter 31 of these regulations – Waste Minimization, Article 1 – Pollution Prevention and the Hazardous Waste Source Reduction and Management Review requires that generators of 12,000 kilograms/year of typical, operational hazardous waste evaluate their waste streams every four years and, as applicable, select and implement viable source reduction alternatives. This Act does not apply to non-typical hazardous waste, including asbestos-containing materials and PCBs, among others.

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

The Unified Hazardous Waste and Hazardous Materials Management Regulatory Program was created in 1993 by Senate Bill 1082 to consolidate, coordinate, and make consistent the administrative requirements, permits, inspections, and enforcement activities of environmental and emergency management programs. The program is implemented at the local government level by CUPAs. The program consolidates, coordinates, and makes consistent the following hazardous materials and hazardous waste programs:

- Hazardous Waste Generation (including on-site treatment under Tiered Permitting)
- Aboveground Storage Tanks (only the spill prevention control and countermeasure plan)
- Underground Storage Tanks
- Hazardous Material Release Response Plans and Inventories
- California Accidental Release Prevention Program Uniform Fire Code Hazardous Material Management Plans and Inventories

California Accidental Release Prevention Program

Similar to the Federal Risk Management Program, the California Accidental Release Prevention Program includes additional state requirements and an additional list of regulated substances and thresholds. The regulations of the program are contained in CCR Title 19, Division 2, Chapter 4.5. The intent of the California Accidental Release

Prevention Program is to provide first responders with basic information necessary to prevent or mitigate damage to public health, safety, and the environment from the release or threatened release of hazardous materials.

The RMP, as described by the California Accidental Release Prevention Program, is required for any owner or operator of a stationary source that has more than a threshold quantity of regulated substances specified in Tables 1-3, CCR, Title 19 Section 2770.5.

California Health and Safety Code

The handling and storage of hazardous materials is regulated by Division 20, Chapter 6.95 of the California Health and Safety Code. Under Sections 25500–25543.3, facilities handling hazardous materials are required to prepare a HMBP that contains basic information on the location, type, quantity, and health risks of hazardous materials stored, used, or disposed of in the state.

Chapter 6.95 of the Health and Safety Code establishes minimum statewide standards for HMBPs. Each business shall prepare a HMBP if that business uses, handles, or stores a hazardous material (including hazardous waste) or an extremely hazardous material in quantities greater than or equal to 500 pounds of a solid substance, 55 gallons of a liquid, 200 cubic feet of compressed gas, a hazardous compressed gas in any amount (highly toxic with a Threshold Limit Value of 10 parts per million or less), or extremely hazardous substances in threshold planning quantities. In addition, in the event that a facility stores quantities of specific acutely hazardous materials above the thresholds set forth by California code, facilities are also required to prepare a RMP and California Accidental Release Plan.

Aboveground Storage Tanks

Title 22 California HSC, Division 20, Chapter 6.67, Sections 25270 to 25270.13_applies if a facility is subject to SPCC regulations under Title 40 U.S.C. Part 112, or if the facility has 10,000 gallons or more of petroleum in any or combination of aboveground storage tanks (ASTs) and connecting pipes. If a facility exceeds these criteria, it must prepare a SPCC plan.

California Occupational Safety and Health Administration Hazard Handling Procedures

The California Division of Occupational Safety and Health Administration (Cal/OSHA) is the primary agency responsible for worker safety in the handling and use of chemicals in the workplace. Cal/OSHA standards are generally more stringent than federal regulations. The employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure (8 CCR 337–340). The regulations specify requirements for employee training, availability of safety equipment, accident prevention programs, and hazardous substance exposure warnings.

California Department of Transportation/California Highway Patrol

The California DTSC administers the transportation of hazardous materials throughout the state. Regulations applicable to the transportation of hazardous waste include Title 22, Division 4.5, Chapter 13 and Chapter 29 of the CCR, as well as Division 20, Chapter 6.5, Articles 6.5, 6.6, and 13 of the California Health and Safety Code. The DTSC requires that drivers transporting hazardous wastes obtain a certificate of driver training that shows the driver has met the minimum requirements concerning the transport of hazardous materials, including proper labeling and

marking procedures, loading/handling processes, incident reporting and emergency procedures, and appropriate driving and parking rules.

Under Title 13 CCR, Division 2, Chapter 6, California regulates the transportation of hazardous waste originating or passing through the state. The CHP and California Department of Transportation (Caltrans) have primary responsibility for enforcing federal and state regulations and responding to hazardous materials transportation emergencies. CHP enforces materials and hazardous waste labeling and packing regulations that prevent leakage and spills of material in transit and provides detailed information to cleanup crews in the event of an incident. Vehicle and equipment inspection, shipment preparation, container identification, and shipping documentation are all part of the responsibility of CHP. CHP conducts regular inspections of licensed transporters to support regulatory compliance. Caltrans has emergency chemical spill identification teams at locations throughout the state. Hazardous waste must be regularly removed from generating sites by licensed hazardous waste transporters. Transported materials must be accompanied by hazardous waste manifests.

California Disaster and Civil Defense Master Mutual Aid Agreement

As provided for in the California Emergency Services Act, the California Disaster and Civil Defense Master Mutual Aid Agreement was developed in 1950 and adopted by all 58 California counties. This statewide mutual aid system is designed to ensure that adequate resources, facilities, and other support is provided to jurisdictions whenever their own resources prove to be inadequate to cope with a given situation. San Diego County is located in Mutual Aid Region 6 of the state system, which also includes Imperial, Riverside, San Bernardino, Inyo, and Mono Counties (OES 2008).

Local

San Diego County Department of Environmental Health and Quality

The San Diego County Department of Environmental Health and Quality serves to protect the environment and enhance public health by preventing disease, promoting environmental responsibility, and when necessary enforcing environmental and public health laws. Within the San Diego Department of Environmental Health and Quality, the Hazardous Materials Division protects human health and the environment by ensuring that hazardous materials, hazardous waste, medical waste and underground storage tanks are properly managed. To accomplish this goal, the Hazardous Materials Division regulates facilities that handle or store hazardous materials, are part of the California Accidental Release Prevention Program, generate or treat hazardous wastes or medical waste, store at least 1,320 gallons of aboveground petroleum, and own or operate USTs. Department of Environmental Health identifies disposal locations for household hazardous waste as well as scheduled household waste collection events.

San Diego Regional Water Quality Control Board

The San Diego RWQCB implements the California Water Code, which regulates waste discharges to land. If a discharge of waste threatens a water of the state, a report of waste discharge or an application for a waiver of a report of waste discharge must be filed with the RWQCB. The RWQCB accomplishes its permitting responsibility by issuing either a general or site-specific permit (Waste Discharge Permit), or a waiver of a permit.

San Diego County Emergency Operations Plan

The San Diego County Emergency Operations Plan is a comprehensive emergency management system that provides for a planned response to disaster situations associated with natural disasters, technological incidents, and nuclear defense operations. The Emergency Plan includes operational concepts relating to various emergency situations, identifies components of the Emergency Management Organization, and describes the overall responsibilities for protecting life and property and assuring the overall well-being of the population. The plan also identifies the sources of outside support that might be provided (through mutual aid and specific statutory authorities) by other jurisdictions, state and federal agencies, and the private sector (County of San Diego and USDCESO 2022).

Wildland-Urban Interface Code

The City of Chula Vista adopted the International Wildland-Urban Interface Code in 1997, and subsequently in 2000, as part of Chula Vista Municipal Code, Chapter 15.38. The code was adopted as the urban-wildland interface code of the City for the purpose of prescribing regulations mitigating the hazard to life and property from intrusion of fire from wildland fire exposures, fire exposures from adjacent structures, and prevention of structure fires from spreading to wildland fires.

San Diego County Multi-Jurisdiction Hazard Mitigation Plan

The San Diego County Multi-Jurisdiction Hazard Mitigation Plan was originally prepared in July 2010 and updated most recently in 2023 to meet federal and state requirements for disaster preparedness, as well as for the County to be eligible for funding and technical assistance from state and federal hazard mitigation programs. The plan includes a risk assessment to enable local jurisdictions to identify and prioritize appropriate mitigation actions to reduce losses from potential hazards, including flooding, earthquakes, fires, and man-made hazards. To address potential hazards, the plan then incorporates mitigation goals and objectives, mitigation actions and priorities, an implementation plan, and documentation of the mitigation planning process for each of the 22 participating jurisdictions, including Chula Vista (County of San Diego 2023a).

Community Emergency Response Team Program

The City of Chula Vista provides a Community Emergency Response Team program that offers citizens training on how to respond to emergency situations effectively and efficiently, without placing themselves or others in unnecessary danger. Community Emergency Response Team training includes lessons on managing utilities, putting out small fires, providing basic emergency medical aid, searching for and rescuing victims safely, effectively organizing volunteers, and collecting disaster information to support first responders (City of Chula Vista 2023a).

Airport Land Use Compatibility Plans

State law requires the San Diego County Airport Land Use Commission to prepare Airport Land Use Compatibility Plans (ALUCPs) for all public use and military airports in the County. The ALUCPs must be consistent with the safety and noise standards for military and civilian airports, and requires San Diego County Airport Land Use Commission review of land use plans and regulations, and other land use projects. The San Diego County Regional Airport Authority prepares ALUCPs for San Diego County. The proposed project site is not located within airport influence areas of the Naval Outlying Landing Field Imperial Beach (SDCRAA 2015) or Brown Field Airport (SDCRAA 2010), located in nearby Imperial Beach and Otay Mesa, respectively.

City of Chula Vista General Plan

Chapter 9, Environmental Element, Section 3.4, Hazardous Materials and Waste, of the City General Plan (City of Chula Vista 2021) addresses hazardous materials related issues. Objectives and policies related to hazardous materials that pertain to the proposed project include the following:

Objective E17: Ensure the adequate remediation of contaminated sites as redevelopment occurs in order to protect public health and safety.

Policy E17.1: Clean contaminated sites to protective limits to ensure that planned future uses of such sites and public health and safety are not compromised.

Policy E17.2: Prior to the redevelopment of contaminated sites, ensure adequate remediation in accordance with the recommendations of appropriate environmental assessments and consistent with all applicable regulations and standards.

Objective E18: Minimize the use of toxic products by residents and small businesses and facilitate the proper disposal of household hazardous waste.

Policy E18.1: Provide convenient and affordable household hazardous waste collection facilities and services for residents and small businesses, including City facilities, community collection events, and curbside collection.

Policy E18.2: Minimize the use of toxic products by residents and small businesses through public education on alternative products and methods.

Objective E20: Ensure that facilities using, storing, and handling hazardous materials and waste do not result in significant adverse effects to existing and planned surrounding land uses.

Policy E20.1: On a periodic basis, review and modify, where necessary, the City's zoning regulations to ensure that adequate provisions are in place to avoid adverse effects to surrounding land uses from facilities using, storing, and handling hazardous materials and waste.

Policy E20.2: Through the environmental review of proposed developments, in accordance with the California Environmental Quality Act, the City shall ensure that significant and potentially significant adverse effects from facilities using, storing, and handling hazardous materials and waste to existing and planned surrounding land uses will be avoided.

Policy E20.3: Prior to the issuance or renewal of business licenses for businesses involving hazardous materials and/or generating hazardous waste, the City shall continue to require licensees to prepare and submit an acceptable Business Plan and Risk Management Prevention Program to the County Department of Environmental Health, as applicable, and to obtain all other necessary licenses and permits.

In addition, Chapter 8, Public Facilities and Services Element, Section 3.2.3, Emergency Response Program, and Section 3.2.4, Post Emergency Response, of the City General Plan (City of Chula Vista 2021) address emergency

response and disaster evacuation related issues. Objectives and policies related to these issues that pertain to the proposed project include the following:

Objective PFS7: Develop pre-disaster programs to ensure swift and efficient response to emergencies and disasters.

Policy PFS 7.1: Implement a Citywide Emergency Response Plan to respond to local and regional emergencies, maintain and update it as needed to respond to changes in emergency response systems and threats to public safety. Identify minimum widths for the roads and for vegetation-clear areas for the identified evacuation routes.

Policy PFS 7.3: Educate the community about emergency preparedness and evacuation routes.

Policy PFS 7.4: Prepare, maintain, and implement a current Hazard Mitigation Plan, in compliance with Federal law.

Policy PFS 7.5: When applicable and available, apply for Hazard Mitigation Grant Program funding from FEMA, with reference to the HAZMIT Plan.

Objective PFS8: Provide for the efficient and effective delivery of public health, safety, and welfare services in post-disaster situations.

Policy PFS 8.1: Cooperate with local, state, and federal agencies, and with emergency response organizations such as the Red Cross, to ensure temporary housing for displaced residents following an emergency or disaster situation.

Policy PFS 8.2: Within six months of any area-wide disaster, analyze the response, the City-wide Emergency Response Plan, and the HAZMIT Plan, and propose revisions as needed.

Policy PFS 8.3: Develop post-disaster development regulations to assist displaced residents to rebuild damaged and destroyed structures as expeditiously as possible.

Policy PFS 8.4: In the event of a disaster in Chula Vista, apply for and obtain Federal funding from FEMA, as applicable, to augment recovery efforts in the community.

5.8.1.2 Existing Setting

Historic Property Use

The project site consists of Planning Areas A, B-1, and B-2, as illustrated in Figure 5.8-1, Planning Areas. This portion of the Bayfront Planning Area is commonly referred to as the North Campus Property, which consists of developed land occupied by the former Rohr Aircraft Facility. The site is currently developed with one office building and two industrial buildings. One of the industrial buildings in Planning Area A, known as Building 29 (795 H Street), was used for research & development, tooling, and warehouse and distribution of aftermarket products until February 2021 (Figure 5.8-2, Former Site Uses). Planning Areas B-1 and B-2 were used for manufacturing operations, which ceased in approximately 2020. A 40-foot-wide San Diego Gas and Electric Company (SDG&E) right-of-way with an abandoned rail line and a 150-foot-wide SDG&E easement runs north–south through the project site. An SDG&E substation is also located on the north end of the project site. However, these latter two features are not part of the project.

Prior to Rohr's occupancy in 1941, the project site and adjacent areas had a variety of historical uses. In the 1920s, a business located within Planning Area B-1 (Figure 5.8-1) manufactured a cementitious material called Tycrete. The facility included a rotary kiln, laboratory, and paint shop. Businesses occupied Planning Area A beginning in the early 1950s and included aircraft parts manufacturing, refrigeration unit repair, storage, junkyards, and a veterinary hospital. The off-site property immediately north of G Street was used for industrial purposes as early as 1918, when a magnesite ore processing company and aviation company occupied this area. In addition, where off-site Building 61 is currently located, the City of Chula Vista operated a sewage treatment plant from the late 1930s until the mid-1960s (Figure 5.8-2). Two settling ponds were present at the current location of Building 61 from about 1944 to 1959 and two settling ponds were located west of Building 61 around 1965. Treated effluent was discharged to San Diego Bay via an outfall. In 1960-1962, the Unified Port of San Diego placed dredged fill from San Diego Bay along the historical shoreline on the western portions of Planning Areas B-1 and B-2, as well as the western portion of off-site Parcel C and the areas west of the site (Appendices H-1, H-2, and H-3).

Since 1941, structural and engine components for use in the aviation and aerospace industry have been manufactured within Planning Areas A, B-1, B-2, and offsite Parcel C. Historical environmental features that could be potential sources of chemicals beneath Parcel A included ASTs, USTs, paint booths, vapor degreasers, hydraulic equipment, and maintenance and storage areas (Figure 5.8-2). This equipment has been removed. Manufacturing operations in Planning Areas B-1 and B-2, which ceased approximately one year ago, included metal casting and fabrication, metal cutting, punching, bending, forming, anodizing, alodining and painting of metal parts, milling through the use of machining and chemical processes, tool and die casting and shaping, assembly, and storage. Secondary activities that supported the manufacturing processes included maintenance and storage of vehicles, recycling of materials, hazardous materials storage in ASTs and USTs, and operation of an industrial wastewater treatment plant (Appendices H-1, H-2, and H-3).

Hazardous Material Sites

Chemicals stored and used on-site and immediately off-site during manufacturing operations have been found in the soil, soil gas, and groundwater as reported in environmental investigation reports and groundwater monitoring reports. The chemicals discharged include, but are not limited to, volatile organic compounds (VOCs), metals, petroleum hydrocarbons, polycyclic aromatic hydrocarbons (PAHs), and polychlorinated biphenyls (PCBs), all of which are considered chemicals of concern (COCs). The discharge of these COCs to the environment constitutes a discharge of waste, as defined in Water Code section 13050, subsection (d). In 1998, the San Diego RWQCB issued Cleanup and Abatement Order (CAO) No. 98-08 for the Rohr facility to abate discharges from its facility. CAO No. 98-08 includes directives to (1) conduct a site-wide environmental site assessment, (2) conduct a comprehensive storm water runoff sampling program, (3) conduct a comprehensive storm water conveyance system investigation, (4) perform a site-wide data compilation and evaluation, and (5) conduct interim remedial actions. The San Diego RWQCB subsequently issued CAO R9-2021-0042 in July 2021, which includes directives and timelines to remediate soil, soil gas, and groundwater at the property (Appendix H-3).

Soil Investigations

Soil investigations completed as part of the site-wide environmental site assessment concluded that COCs in the vadose-zone soil exceed the respective ESLs, which indicate they may leach into groundwater at concentrations impacting the municipal and domestic supply (MUN) beneficial use designation, as established by the San Diego RWQCB. Water quality objectives for MUN beneficial uses is the Maximum Contaminant Levels (MCLs), as specified in the EPA National Primary Drinking Water Regulations. Groundwater is present at a depth of approximately 20 to 35 feet beneath Planning Area A, and 2 to 10 feet beneath Planning Areas B-1 and B-2 (Appendices H-1 and H-2).

In addition to groundwater impacts, COCs in soil in excess of ESLs may pose a cancer risk and noncancer hazard to commercial/industrial and construction workers via ingestion, inhalation, and dermal exposures (Appendix H-3).

Groundwater Investigations

Groundwater investigations at the project site have identified the presence of COCs within the three water-bearing zones at the Site:

- Zone A – extends to a depth of approximately 25 feet below ground surface (bgs), which generally corresponds to the artificial fill and Bay Deposits.
- Upper Zone B – extends approximately 25 to 55 feet bgs, which generally refers to the upper portion of the Bay Point Formation.
- Lower Zone B – extends approximately 55 to 125 feet bgs, which generally refers to the lower portion of the Bay Point Formation.

The concentrations of these COCs exceed the (1) MCLs, which indicate they are impacting the MUN beneficial use in the three zones, and (2) vapor intrusion ESLs, which indicate they may pose a potential vapor intrusion risk to current and future building occupants (Appendices H-2 and H-3).

Groundwater is impacted by the chlorinated solvents to a depth of about 100 feet. The groundwater in this interval is not suitable for drinking as it has high mineralization and salinity. This sequence of soil is also not very permeable. An approximately 20-foot thick clay layer separates impacted groundwater from deeper formations. Potable water is present in a deeper aquifer (approximately 700 feet bgs and deeper) known as the San Diego Formation (Haley & Aldrich, personal communication).

Soil Gas Investigations

Soil gas investigations were conducted at Building 29 in Planning Area A (Figure 5.8-2), in May 2018 and August 2020, and in Planning Area B-1 and B-2 in September 2019. These investigations assessed the presence of COCs in soil gas beneath building slabs and hardscape. The concentrations of certain VOCs exceeded the respective soil gas ESLs, which indicate they may pose a potential vapor intrusion risk to future building occupants (Appendix H-3).

Cleanup Levels Pursuant to Resolution No. 92-49

SWRCB Resolution No. 92-49, Policies and Procedures for Investigation, and Cleanup and Abatement of Discharges, under Water Code Section 13304, sets forth the policies and procedures used during an investigation or cleanup of a discharge of waste and requires that cleanup levels be consistent with SWRCB Resolution No. 68-16, Statement of Policy with Respect to Maintaining High Quality of Waters in California. Resolution No. 92-49 applies to the cleanup and abatement of the effects of waste discharged at the project site (Appendix H-3).

Resolution No. 92-49 requires that Dischargers clean up or abate the effects of discharges in a manner that promotes the attainment of background water quality, or the best water quality that is reasonable if background water quality cannot be restored, considering all demands being made and to be made on those waters and the total values involved, beneficial and detrimental, economic and social, tangible and intangible. Any alternative cleanup level greater than background must (1) be consistent with the maximum benefit to the people of the state; (2) not unreasonably affect present and anticipated beneficial use of waters of the state; and (3) not result in water

quality less than that prescribed in the Basin Plan and applicable Water Quality Control Plans and Policies of the SWRCB (Appendix H-3).

Site Cleanup or Abatement Orders

In addition to SWRCB Resolution No. 92-49, in accordance with CAO Nos. 98-08 and R9-2021-0042, the property waste Dischargers must take all corrective actions necessary to clean up or abate the effects of the discharges to soil, soil gas, and groundwater at the site, including:

1. Wastes in soil at the site must be cleaned up or abated in a manner that promotes attainment of background concentrations or alternative cleanup levels in groundwater and protects human health.
2. Wastes in groundwater at the site must be cleaned up or abated in a manner that attains background concentrations or alternative cleanup levels approved by the San Diego RWQCB.
3. Wastes in groundwater at the point-of-compliance wells located along San Diego Bay and Chula Vista Marina shorelines must be cleaned up or abated in a manner that attains (a) background concentrations in groundwater or (b) California Toxic Rule water quality standards for human ingestion of water/seafood and risk-based concentrations protective of aquatic receptors.
4. Wastes in soil gas at the site caused by soil and/or groundwater contamination must be cleaned up or abated in a manner that protects human health.

In addition, in compliance with the CAOs, the Discharger must complete additional conceptual site models, site data investigation reports, HHRAs, remedial action plans, site groundwater cleanup levels report, and groundwater monitoring program (Appendix H-3).

Site Feasibility Study for Cleanup to Background Levels

The first four directives issued under CAO No. 98-08 pertaining to site investigations (listed above) are complete. Interim remedial actions are currently underway at the off-property area (to the west) known as Parcel H-3, pursuant to CAO No. 98-08. Pursuant to Resolution No. 92-49, Rohr submitted a technical analysis to the San Diego RWQCB in October 2019 to identify the background cleanup levels for inorganic chemicals in soil and groundwater at the site. The cleanup levels for inorganic chemicals in (1) soil must lead to attainment of background water quality in groundwater, and (2) groundwater must attain background water quality. For all organic chemicals, the background soil and groundwater cleanup levels are non-detect concentrations. The detection limits for all organic chemicals in soil must not exceed the respective EPA Region 9 RSLs and the San Francisco Bay RWQCB ESLs. The detection limits for all organic chemicals in groundwater must not exceed the respective MCLs (Appendix H-3).

In April 2020, pursuant to Resolution No. 92-49, Rohr prepared a feasibility study to determine if it is technologically and economically feasible to clean up the wastes in groundwater at the site to the background cleanup levels. While Rohr concluded that it is infeasible based on (1) the results of the site-specific trend analysis and (2) the presumed slow back-diffusion of VOC mass stored in fine-grained layers beneath the site, the San Diego RWQCB requires that Rohr confirm its conclusion by collecting additional data during implementation of the site groundwater Remedial Action Plan. At a minimum, remediation performance monitoring data shall be used to reevaluate the technical feasibility and incremental cost benefit of remediating to background water quality conditions, including evaluating whether back-diffusion is a significant deterrent to reaching background water quality conditions. Because Rohr determined it was infeasible to clean up to the background cleanup levels in its April 2020 feasibility study, Rohr proposed alternative cleanup levels (Appendix H-3).

Site Remediation

As of July 2023, Rohr has met all the requirements of the CAO to-date with respect to site investigations (San Diego RWQCB 2023). A Remedial Action Plan to address chemically impacted soil has been submitted to the San Diego RWQCB and is pending approval. Site soil remediation, which is anticipated to begin in 2024, will be conducted to achieve groundwater protection and site-specific human health, risk-based cleanup goals, the latter of which were identified through the HHRA. The cleanup goals are protective of human health and the environment, as described above. A separate Remedial Action Plan to address chemically impacted groundwater beneath the site also is under regulatory review and groundwater cleanup activities also will commence in 2024. Remediation activities to address both soil and groundwater would be completed prior to initiation of project construction, and under the guidance of the San Diego RWQCB. Any new groundwater monitoring wells would be installed under the guidance of the San Diego County Department of Environmental Health and Quality, Hazardous Materials Division (Susan Gallardo, personal communication February 2024).

Rohr is responsible for groundwater remediation on the site and adjacent areas formerly part of Rohr and/or that have been impacted by impacted groundwater migration. Rohr has implemented groundwater remediation programs approved by the San Diego RWQCB on the adjacent South Campus and H-3 Parcel, located south and west of the site, respectively. The groundwater remediation programs involve injecting microbes and nutrients to break down the trichloroethylene (TCE) and its breakdown products into harmless chemicals (i.e., in-situ bioremediation). Monitoring will be conducted in monitoring wells to monitor the performance of the remediation system. Initial results have been favorable. Additional injections may be conducted to fine tune the groundwater remediation and accelerate its progress. The treatment and monitoring will occur for several years. A program similar to these will be implemented within Planning Area B. A groundwater remediation plan was submitted to the San Diego RWQCB in 2023 (Appendix H-2; Haley & Aldrich 2023, personal communication; Knapton, M. personal communication).

Based on the property sale agreement with Rohr, PW Wohl G Street, LLC, which is partially responsible for remediation efforts on Planning Area B-1, is required to mitigate vapors that may be generated by TCE and other volatile compounds in soil and groundwater.

Sensitive Receptors

Several schools are located within one mile of the project site, including:

- Mueller Charter School, located 0.2 mile to the southeast;
- Vista Square Elementary School, located 0.5 mile to the northeast;
- South Bay YMCA Preschool, located 0.5 mile to the northeast; and
- Chula Vista Middle School, located 0.7 mile to the northeast.

Airports

As described above in Section 5.8.1.1, the proposed project site is not located within airport influence areas of the Naval Outlying Landing Field Imperial Beach (SDCRAA 2015) or Brown Field Airport (SDCRAA 2010), located in nearby Imperial Beach and Otay Mesa, respectively.

Wildland Fire Hazards

The project site is located in an urban area, adjacent to San Diego Bay, and is not located in an area of high, very high, or undetermined fire hazard (City of Chula Vista 2021).

Evacuation Routes

Portions of the shoreline in Chula Vista, not including the project site, are potential tsunami flood areas. Tsunami evacuation routes have been established from the marina area, Sweetwater Marsh National Wildlife Refuge, and the San Diego National Wildlife Refuge, which are all located in the vicinity of the project site (County of San Diego 2023b). However, the project site is not located within any of these evacuation routes (City of Chula Vista 2023a). As discussed above, the project site is not located in a fire hazard area. In addition, the project site is not located in an evacuation route, in the event of a major disaster (City of Chula Vista 2021).

5.8.2 Thresholds of Significance

The significance criteria used to evaluate the project impacts related to hazards and hazardous materials are based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to hazards and hazardous materials would occur if the project would:

1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
2. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
4. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as result, would it create a significant hazard to the public or the environment.
5. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area.
6. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
7. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

5.8.3 Impacts

This impact analysis assumes that the proposed project would be constructed and operated in compliance with the policies and regulations applicable to hazards and hazardous materials, as described above in Section 5.8.1.1, Regulatory Framework. A review of project site investigations and applicable regulatory records was conducted to characterize the existing environmental setting in the study area, as described above in Section 5.8.1.2, Existing Setting, and to identify any existing hazardous waste and substances sites on or near the project site that could affect construction or operation of the proposed project. Impacts have been evaluated with respect to the

thresholds of significance, as described above. In the event adverse environmental impacts would occur even with consideration of applicable policies, regulations, and standard construction practices, impacts would be potentially significant, and mitigation measures are provided to reduce impacts to less than significant.

The City has identified Project Design Features (PDFs) (see Section 4.4.5, Project Design Features) that would be implemented during construction to avoid or minimize impacts. PDF-6, which indicates that new construction should incorporate non-polluting and non-toxic materials and finishes with zero or low VOCs, applies to the proposed project. Where applicable, this practice and its effectiveness in avoiding or minimizing impacts related to hazardous material are described below.

The proposed project involves the preparation of a Specific Plan that would govern future development within the three Planning Areas (A, B-1, and B-2) at the project site. New land use designations would include Commercial Retail, Commercial Visitor, Commercial Office, Light Industrial, Regional Technology Park, and Business Park Flex, as described in more detail in Table 4-1, Proposed Land Uses. It is anticipated that construction of the project would occur over approximately 5 years, and would include minor grading, utility installation, paving, and building construction.

Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction

The construction of the project may require the use of hazardous materials. Construction would require the use of heavy equipment and machinery. Hazardous materials that may be used during construction activities include, but are not limited to, gasoline, diesel fuel, lubricants, grease, adhesives, welding gases, solvents, paints, and vehicle- and equipment-maintenance-related materials. These materials would be stored in designated construction staging areas within the boundaries or adjacent to the project site. The construction contractor would be required to ensure that the transport, handling, use, storage, and disposal of any hazardous materials are in accordance with the manufacturer's specifications and all applicable federal, state, and local laws and regulations. Many of the anticipated hazardous construction materials may be recycled and those that cannot be recycled would be transported by a licensed hazardous waste hauler and disposed of at an appropriately permitted off-site facility, in accordance with 22 CCR, Division 4.5, Environmental Health Standards for the Management of Hazardous Waste. The proper use and handling of these substances would not present a health risk to the public or environment. In addition, the City has identified PDFs (see Section 4.4.5, Project Design Features) that would be implemented during construction to avoid or minimize impacts. PDF-6, which indicates that new construction should incorporate non-polluting and non-toxic materials and finishes with zero or low VOCs, applies to the proposed project. This practice would contribute to avoiding or minimizing impacts related to hazardous materials during construction. Therefore, the construction of the project is not anticipated to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be **less than significant.**

Operations

Based on proposed light industrial zoning, hazardous materials used during the operation of individual projects within the Specific Plan area would include various commercially available hazardous materials and cleaning products. When used in compliance with manufacturer's recommendations and applicable regulations, these chemicals do not result in a risk to human health or the environment. The routine transport, use, and/or disposal

of these substances would be subject to applicable federal, state, and local health and safety laws and regulations, which would minimize risks associated with their use.

Storage, use, and disposal of petroleum products and hazardous substances would be completed at individual businesses in accordance with a HMBP, which would identify the hazards, storage locations, and storage quantities for each hazardous chemical stored on-site. The HMBP would be submitted for approval to the San Diego County Department of Environmental Health and Quality, Hazardous Materials Division, the CUPA for emergency planning purposes in the City. In addition, a SPCC would be prepared for the individual businesses if oil is stored in ASTs in excess of 10,000 gallons (total on-site). The HMBP and SPCC would identify secondary containment and countermeasures to be in place during operations so that if any leaks or spills occur, responses would be made immediately. Emergency spill supplies and equipment would be clearly marked and located adjacent to areas of work. The HMBP and SPCC would be updated as applicable to ensure ongoing compliance with all applicable federal, state, and local requirements related to hazardous materials. As a result, project operations are not anticipated to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be **less than significant.**

Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction

Soil Contamination

As described in detail in Section 5.8.1.2, chemicals associated with historical operations at the project site have been identified in soil and groundwater, including, but not limited to, VOCs, metals, petroleum hydrocarbons, PAHs, and PCBs. On-site structures in Planning Areas B-1 and B-2 have been demolished, all building debris has been hauled off-site to appropriate disposal facilities, and Raytheon Technologies Corporation, of which Rohr is a wholly owned company, is completing soil and groundwater remediation in accordance with San Diego RWQCB CAO R9-2021-0042, which was issued to Rohr in July 2021. The CAO includes directives and timelines to remediate soil, soil gas, and groundwater at the property. Soil remediation goals are protective of human health and the environment, based on site specific health-based remediation goals identified through HHRAs.

The cleanup levels for inorganic chemicals in (1) soil must lead to attainment of background water quality in groundwater, and (2) groundwater must attain background water quality. For all organic chemicals, the background soil and groundwater cleanup levels are non-detect concentrations. The detection limits for all organic chemicals in soil must not exceed the respective EPA Region 9 RSLs and the San Francisco Bay RWQCB ESLs. The detection limits for all organic chemicals in groundwater must not exceed the respective MCLs. Soil remediation would be completed prior to initiation of project construction, and under the guidance of the San Diego RWQCB and San Diego County Department of Environmental Health and Quality, Hazardous Materials Division. Minor amounts of site grading and trenching for utilities installation would occur as part of project construction. Because soil contamination would be remediated to San Deigo RWQCB and San Diego Department of Environmental Health and Quality standards prior to project construction, minor grading and trenching would not encounter contaminated soil that could result in a significant hazard to on-site construction personnel or the environment, and would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Impacts would be **less than significant**.

Incidental Spills of Hazardous Substances

Relatively small amounts of commonly used hazardous substances such as gasoline, diesel fuel, lubricating oil, adhesive materials, grease, solvents, and architectural coatings would be used during construction. These materials are not considered extremely hazardous and are used routinely for both construction projects and structural improvements. These materials would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials, and would be managed in accordance with the federal, state, and local rules and regulations.

As discussed in more detail in Section 5.9, Hydrology and Water Quality, the proposed project would be subject to the provisions of the Construction General Permit, including preparation of a stormwater pollution prevention plan (SWPPP) and implementation of best management practices (BMPs), designed to prevent and minimize incidental spills of petroleum products and hazardous materials during construction. Additionally, the City's BMP Design Manual (City of Chula Vista 2023b provides guidance for development and public improvement projects to comply with the 2013 Municipal Separate Storm Sewer System (MS4) Permit (Order No. R9-2013-0001, as amended by R9-2015-0001 and R9-2015-0100). With compliance with the Construction General Permit and MS4 Permit, project construction would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Impacts would be **less than significant**.

Operation

Groundwater Contamination and Soil Gas

As discussed in Section 5.8.1.2, concentrations of COCs in groundwater exceed the vapor intrusion ESLs, which indicate they may pose a potential vapor intrusion risk to future building occupants. Groundwater is impacted by chlorinated solvents to a depth of about 100 feet. Resolution No. 92-49 requires that Dischargers clean up or abate the effects of discharges in a manner that promotes the attainment of background water quality, or the best water quality that is reasonable if background water quality cannot be restored. In addition, CAO Nos. 98-08 and R9-2021-0042 require that the property waste Dischargers take all corrective actions necessary to clean up or abate the effects of the discharges to soil, soil gas, and groundwater at the site, including wastes in soil gas at the site caused by soil and/or groundwater contamination.

Rohr is responsible for groundwater remediation on the site and adjacent areas formerly part of Rohr and/or that have been impacted by impacted groundwater migration. Rohr has implemented groundwater in-situ bioremediation programs, approved by the San Diego RWQCB, on the adjacent South Campus and H-3 Parcel, located south and west of the site, respectively. Monitoring will be conducted in monitoring wells to monitor the performance of the remediation system. Initial results have been favorable. The treatment and monitoring will occur for several years. A program similar to these will be implemented within Planning Area B. A groundwater remediation plan was submitted to the San Diego RWQCB in 2023 (Appendix H-2; Haley & Aldrich 2023, personal communication; Knapton, M. personal communication).

In addition, based on the property sale agreement with Rohr, PW Wohl G Street, LLC, which is partially responsible for remediation efforts on Planning Area B-1, is required to mitigate vapors that may be generated by TCE and other volatile compounds in soil and groundwater. Vapor barriers will be placed beneath the new building slabs so that vapors cannot enter the new buildings and cause a human health risk (Haley & Aldrich 2023, personal communication). With implementation of groundwater remediation, under the guidance of the

San Diego RWQCB and San Diego County Department of Environmental Health and Quality, Hazardous Materials Division, in combination with installation of vapor barriers beneath proposed building slabs, soil gas beneath proposed individual buildings within the Specific Plan area would not create a significant hazard to the public or the environment, and would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Impacts would be **less than significant**.

Hazardous Materials Use in Proposed Businesses

Operation of individual projects within the Specific Plan area would likely involve the use of chemicals used in the day-to-day operation of each business, as well as commercially available cleaning products, landscaping chemicals and fertilizers, and various other commercially available products. While these materials could be stored on the project site, storage would likely occur in compliance with the guidelines established by the manufacturer's recommendations. As required by the above referenced federal, state, and local regulations, the transport, removal, storage, use and disposal of hazardous materials from the individual businesses would be conducted by a permitted and licensed service provider. Any handling, transport, use, or disposal must also comply with all applicable federal, state, and local agencies and regulations.

The City of Chula Vista currently reports hazardous materials to the local CUPA (San Diego County Department of Environmental Health and Quality, Hazardous Materials Division), as required by state and local laws requiring HMBPs, SPCCs, RMPs, and Emergency Response Plans (see Section 5.8.1.1, Regulatory Framework). Transportation of these hazardous materials and wastes would also be conducted in accordance with federal, state, and local laws (Caltrans and U.S. Department of Transportation). With the adherence to applicable federal, state, and local rules and regulations and implementation of standard construction practices and standard operating practices, the operational impact of the proposed project related to the creation of hazards due to the routine transport, use, and disposal of hazardous materials, would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and would be **less than significant**.

Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

As discussed in Section 5.8.1.2, Mueller Charter School is located 0.2 mile to the southeast of the project site. However, as previously discussed, the project is not anticipated to result in significant impacts associated with the release of hazardous materials into the environment. All hazardous materials used on-site during construction and operation would be used, handled, and stored in compliance with all applicable federal, state, and local health and safety regulations. Additionally, any on-site hazardous materials that may require transportation off-site would be transported by a licensed contractor and properly disposed of. Therefore, although the project is located within one-quarter mile of an existing school, impacts to this school from emission and/or handling of hazardous materials, substances, or waste would be **less than significant**.

Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

As described in detail in Section 5.8.1.2, chemicals associated with historical operations at the project site have been identified in soil and groundwater, including, but not limited to, VOCs, metals, petroleum hydrocarbons, PAHs,

and PCBs. As a result, the project site is listed on the Cortese list database, pursuant to Government Code Section 65962.5, including the SWRCB GeoTracker database (leaking underground storage tank sites) (SWRCB 2024) and CalEPA active CAO database (CalEPA 2024). The site is not listed on the DTSC EnviroStor database (hazardous waste sites) (California DTSC 2024).

However, as previously discussed, because soil contamination would be remediated to San Diego RWQCB and San Diego Department of Environmental Health and Quality standards prior to commencement of project construction, minor grading and trenching activities associated with the project are not anticipated to encounter contaminated soil that could result in a significant hazard to on-site construction personnel or the environment. In addition, with implementation of groundwater remediation, under the guidance of the San Diego RWQCB and San Diego County Department of Environmental Health and Quality, Hazardous Materials Division, in combination with installation of vapor barriers beneath proposed building slabs, soil gas beneath proposed individual buildings within the Specific Plan area would not create a significant hazard to the public or the environment. Impacts would be **less than significant**.

For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

As described above in Section 5.8.1.1, the proposed project site is not located within airport influence areas of the Naval Outlying Landing Field Imperial Beach or Brown Field Airport, located in nearby Imperial Beach and Otay Mesa, respectively. No other airports are located within 2 miles of the project site. Therefore, **no impacts** would occur.

Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Portions of the shoreline in Chula Vista, not including the project site, are potential tsunami flood areas. Tsunami evacuation routes have been established from the marina area, Sweetwater Marsh National Wildlife Refuge, and the San Diego National Wildlife Refuge, which are all located in the vicinity of the project site. However, the project site is not located within any of these evacuation routes. In addition, the project site is not located in an evacuation route, in the event of any other major disaster. Therefore, **no impacts** would occur.

Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

The project site is located in an urban area, adjacent to San Diego Bay, and is not located in an area of high, very high, or undetermined fire hazard. Therefore, **no impacts** would occur.

5.8.4 Level of Significance Prior to Mitigation

The proposed project would have a **less-than-significant impact** with respect to hazards and hazardous materials.

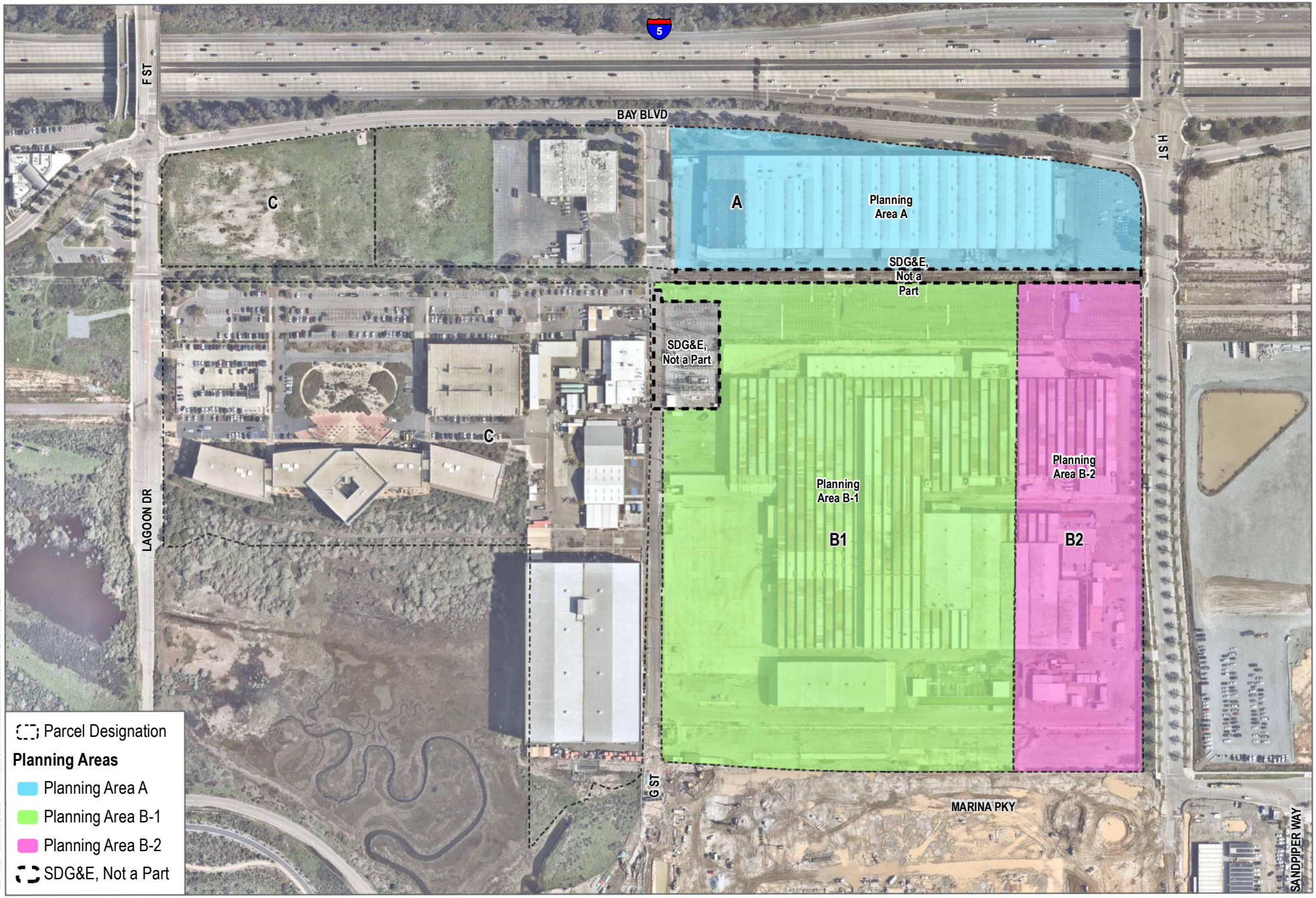
5.8.5 Mitigation Measures

No mitigation measures are required.

5.8.6 Level of Significance After Mitigation

No mitigation measures are required and impacts related to hazards and hazardous materials would be **less than significant**.

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SOURCE: SANGIS 2023; San Diego RWQCB 2021

DUDEK

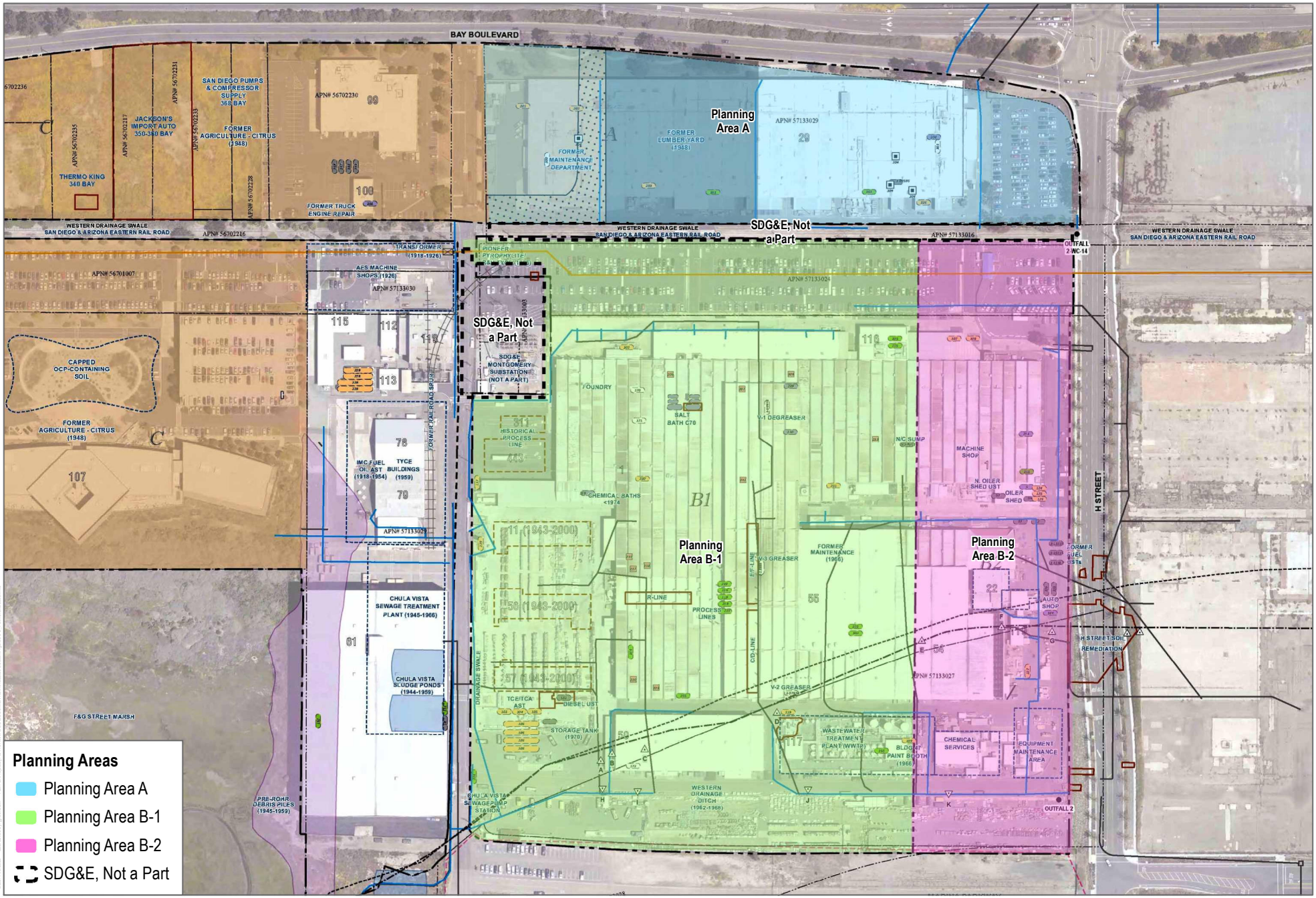
0 150 300 Feet

FIGURE 5.8-1

Planning Areas

Rohr Wohl Specific Plan

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SOURCE: SANGIS 2023; San Diego RWQCB 2021

DUDEK

0 150 300 Feet

FIGURE 5.8-2

Former Site Uses

Rohr Wohl Specific Plan

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5.9 Hydrology and Water Quality

This section describes the existing hydrology and water quality conditions of the project site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed project. The information provided is based in part on the following documents, included as appendices to this environmental impact report.

- Appendix I-1 Preliminary Drainage Report, Yards at the Bay, completed by Project Design Consultants, July 2023
- Appendix I-2 Priority Development Project, Storm Water Quality Management Plan, completed by Project Design Consultants, August 2023

5.9.1 Existing Conditions

5.9.1.1 Regulatory Framework

Federal

Clean Water Act

The federal Clean Water Act (CWA) was enacted with the primary purpose of restoring and maintaining the chemical, physical, and biological integrity of the nation's navigable waters. The State Water Resources Control Board (SWRCB) and the Regional Water Quality Control Boards (RWQCBs) are responsible for enforcing water quality standards within the state. As mandated by Section 303(d) of the CWA, the SWRCB maintains and updates a list of "impaired water bodies" (i.e., water bodies that do not meet state and federal water quality standards). This list is known as the Section 303(d) list of impaired water bodies. The state is required to prioritize waters/watersheds for development of total maximum daily loads (TMDLs). Section 303(d) of the CWA bridges the technology-based and water-quality-based approaches for managing water quality and requires each state to make a list of waters that are not attaining standards after implementation of the technology-based limits. For waters on this list (and where the U.S. Environmental Protection Agency [EPA] administrator deems it appropriate), the states develop TMDLs that are established at the level necessary to implement applicable water quality standards. A TMDL must account for all sources of pollutants that cause the water to be listed. Federal regulations require that TMDLs, at a minimum, account for contributions from point sources and nonpoint sources. This information is compiled in a list and submitted to the EPA for review and approval. Section 303(c)(2)(b) of the CWA requires states to update the TMDLs every 3 years (SWRCB 2023).

Section 319 of the CWA mandates specific actions for the control of pollution from nonpoint sources. The EPA has delegated responsibility for implementation of portions of the CWA, including water quality control planning and programs such as the National Pollutant Discharge Elimination System (NPDES) program, to the SWRCB and the RWQCBs.

National Pollutant Discharge Elimination System Permit

Section 402 of the CWA establishes the NPDES, a permitting system for the discharge of any pollutant (except for dredged or fill material) into waters of the United States. This permit program is administered by the SWRCB and the nine RWQCBs, who have several programs that implement individual and general permits related to

construction activities, stormwater runoff quality, and various kinds of non-stormwater discharges. The NPDES Construction General Permit (CGP) is discussed below under state regulations. In general, in California, a NDPES permit also provides waste discharge requirements (WDRs), although WDRs can be issued for discharges that are not within the coverage of the Section 402 NPDES program.

The Municipal Stormwater Permitting Program under CWA Section 402 regulates stormwater discharges from municipal separate storm sewer systems (MS4s). MS4 permits are issued in two phases: Phase I, for medium and large municipalities, and Phase II for small municipalities. The Phase II Small MS4 General Permit requires the discharger to develop and implement best management practices (BMPs) through a coordinated stormwater program, with the goal of reducing the discharge of pollutants to the maximum extent practicable, which is the performance standard specified in Section 402(p) of the CWA. See the Local section below for the City's Storm Water Management Program.

Federal Antidegradation Policy

The federal Antidegradation Policy (40 CFR 131.12) requires states to develop statewide antidegradation policies and identify methods for implementing those policies. Pursuant to this policy, state antidegradation policies and implementation methods will, at a minimum, protect and maintain (1) existing in-stream water uses; (2) existing water quality where the quality of the waters exceeds levels necessary to support existing beneficial uses, unless the state finds that allowing lower water quality is necessary to accommodate economic and social development in the area; and (3) water quality in waters considered an outstanding national resource. State permitting actions must be consistent with the federal Antidegradation Policy.

National and State Safe Drinking Water Acts

The federal Safe Drinking Water Act, established in 1974, is administered by the EPA and sets drinking water standards throughout the country. The drinking water standards established in the act, as set forth in the Code of Federal Regulations (CFR), are referred to as the National Primary Drinking Water Regulations (Primary Standards; 40 CFR 141), and the National Secondary Drinking Water Regulations (Secondary Standards; 40 CFR 143). According to the EPA, the Primary Standards are legally enforceable standards that apply to public water systems. The Secondary Standards are non-enforceable guidelines regulating contaminants that may cause cosmetic or aesthetic effects in drinking water. The EPA recommends the Secondary Standards for water systems but does not require systems to comply. California passed its own Safe Drinking Water Act in 1986 that authorizes the state's Department of Health Services to protect the public from contaminants in drinking water by establishing maximum contaminant levels (as set forth in the California Code of Regulations (CCR), Title 22, Division 4, Chapter 15) that are at least as stringent as those developed by the EPA, as required by the federal Safe Drinking Water Act.

State

Responsibility for the protection of water quality in California rests with the SWRCB and nine RWQCBs. The SWRCB establishes statewide policies and regulations for the implementation of water quality control programs mandated by federal and state water quality statutes and regulations. The RWQCBs develop and implement water quality control plans that consider regional beneficial uses, water quality characteristics, and water quality problems. The project site is located within the jurisdiction of the San Diego RWQCB.

All projects resulting in discharges, whether to land or water, are subject to Section 13263 of the California Water Code and are required to obtain approval of WDRs by the RWQCBs. WDRs related to land and groundwater (i.e.,

non-NPDES WDRs) regulate discharges of privately or publicly treated domestic wastewater and process/wash-down wastewater. WDRs for discharges to surface water also serve as NPDES permits, which are further described in this section.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act authorizes the SWRCB to adopt, review, and revise policies for all waters of the state (including surface water and groundwater) and directs the RWQCBs to develop regional water quality control plans. Section 13170 of the California Water Code authorizes the SWRCB to adopt water quality control plans on its own initiative.

Waste Discharge Requirements

All dischargers of waste to waters of the state are subject to regulation under the Porter-Cologne Water Quality Control Act, and the requirements for WDRs are incorporated into the California Water Code. This includes point-source and nonpoint-source dischargers. All current and proposed nonpoint-source discharges to land must be regulated under WDRs, waivers of WDRs, a water quality control plan prohibition, or some combination of these administrative tools. Discharges of waste directly to state waters are subject to an individual or general NPDES permit, which also serves as WDRs. The RWQCBs have primary responsibility for issuing WDRs to cover a category of discharges. WDRs may include effluent limitations or other requirements that are designed to implement applicable water quality control plans, including designated beneficial uses and the water quality objectives established to protect those uses and prevent the creation of nuisance conditions. Violations of WDRs may be addressed by issuing Cleanup and Abatement Orders or Cease and Desist Orders, assessing administrative civil liability, or seeking imposition of judicial civil liability or judicial injunctive relief.

NPDES Construction Stormwater General Permit

Effective September 1, 2023, Construction Stormwater General Permit Order 2022-0057-DWQ supersedes SWRCB Order No. 2009-009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ (i.e., the former CGP). SWRCB adopted the current CGP on September 8, 2022. The order requires that, prior to beginning any construction activity, the permit applicant obtain coverage under the CGP by preparing and submitting to the SWRCB a Permit Registration Document that includes a Notice of Intent, stormwater pollution prevention plan (SWPPP), and other compliance related documents required by the CGP. Regulating many stormwater discharges under one general permit greatly reduces the administrative burden associated with permitting individual stormwater discharges.

Construction activities subject to the NPDES CGP include clearing, grading, and disturbances to the ground (e.g., stockpiling or excavating), which result in soil disturbances of at least 1 or more acres of land surface, or that are part of a common plan of development or sale that disturbs more than 1 acre of land surface. Because construction of individual projects within the Specific Plan area would cumulatively disturb more than 1 acre, all improvements and development activities would be subject to these permit requirements. The SWPPP has two main objectives: to help identify the sources of sediment and other pollutants that affect the quality of stormwater discharges, and to describe and ensure the implementation of BMPs to reduce or eliminate sediment and other pollutants in stormwater and non-stormwater discharges.

Sustainable Groundwater Management Act

On September 16, 2014, Governor Jerry Brown signed into law a three-bill legislative package—Assembly Bill 1739 (Dickinson), Senate Bill 1168 (Pavley), and Senate Bill 1319 (Pavley)—collectively known as the Sustainable Groundwater Management Act (SGMA). SGMA requires governments and water agencies of high- and medium-priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For critically overdrafted basins, sustainability should be achieved by 2040. For the remaining high- and medium-priority basins, 2042 is the deadline. Through SGMA, the California Department of Water Resources (DWR) provides ongoing support to local agencies through guidance, financial assistance, and technical assistance. SGMA empowers local agencies to form Groundwater Sustainability Agencies to manage basins sustainably and requires those Groundwater Sustainability Agencies to adopt Groundwater Sustainability Plans for medium- and high-priority groundwater basins in California.

California Water Code, Section 12924

Under California Water Code Section 12924, the California DWR, in conjunction with other public agencies, conducts investigations of the state's groundwater basins. The DWR identifies the state's groundwater basins on the basis of geological and hydrologic conditions and with consideration of political boundary lines whenever practical. The DWR also investigates existing general patterns of groundwater extraction and groundwater recharge within those basins to the extent necessary to identify basins that are subject to critical conditions of overdraft.

Local

San Diego Basin Plan

The RWQCB Water Quality Control Plan for the San Diego Basin (Basin Plan) is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Specifically, the Basin Plan: (1) designates beneficial uses for surface and ground waters; (2) sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the state's antidegradation policy; (3) describes implementation programs to protect the beneficial uses of all waters in the Region; and (4) describes surveillance and monitoring activities to evaluate the effectiveness of the Basin Plan (California Water Code Sections 13240–13244 and Section 13050[j]) (San Diego RWQCB 2021).

Chula Vista BMP Design Manual

In May 2013, the San Diego RWQCB issued Order No. R9- 2013-0001, and as amended by Order Nos. R9-2015-0001 and R9-2015-0100, which is the Regional MS4 Permit for the San Diego Region, including the City of Chula Vista. In accordance with the Regional MS4 Permit, the City is required to adopt a jurisdiction-specific BMP Design Manual. The City of Chula Vista Best Management Practices (BMP) Design Manual modifies the content of the Model BMP Design Manual to include City-specific guidelines and requirements. The City BMP Design Manual addresses updated on-site post-construction stormwater requirements for Standard Projects and Priority Development Projects (PDPs), and provides updated procedures for planning, preliminary design, selection, and design of permanent storm water BMPs, based on the performance standards presented in the MS4 Permit (City of Chula Vista 2023a).

Chula Vista Jurisdictional Runoff Management Program Document

The 2018 Chula Vista Jurisdictional Runoff Management Program outlines City-wide programs and activities designed to prevent and reduce stormwater pollution within City boundaries. This program describes the pollution prevention activities that the City implements, as well as pollution prevention requirements for homes and businesses. Minimum BMPs for construction sites, commercial and industrial businesses, municipal areas, and residential areas are also included in the Chula Vista Jurisdictional Runoff Management Program (City of Chula Vista 2018).

San Diego Bay Watershed Urban Runoff Management Program Document

The City of Chula Vista, along with other responsible San Diego Bay Copermittees, have been actively implementing a Watershed Urban Runoff Management Program since January 2002. The County of San Diego, Port of San Diego, San Diego County Regional Airport Authority, and the cities of Chula Vista, Coronado, Imperial Beach, La Mesa, Lemon Grove, National City, and San Diego (San Diego Bay Copermittees) are continuing their efforts to develop and implement watershed-based programs in the San Diego Bay Watershed Management Area. This document discusses the San Diego Bay Copermittees' efforts to meet the requirements of Section E of Municipal Stormwater Permit, Order Number R9-2007-0001, as well as reduce MS4 discharge, and prevent urban runoff discharges from causing or contributing to a violation of water quality standards. The Watershed Urban Runoff Management Program's primary goal is to cooperatively and through collaborative strategic planning decrease the sources and reduce the discharge of pollutants from the MS4 that have been identified as causing high priority water quality problems (City of Chula Vista et al. 2008).

San Diego Bay Watershed Management Area Water Quality Improvement Plan

The City of Chula Vista, along with other responsible agencies, developed a water quality improvement plan (WQIP) for the San Diego Bay Watershed. The WQIP is a requirement of updated stormwater regulations adopted by the RWQCB, according to Order No. R9-2013-0001, as amended by Order Nos. R9 2015-0001 and R9-2015-0100. The ultimate goal of the WQIP is to protect, preserve, enhance, and restore water quality of receiving water bodies. These improvements in water quality are accomplished through an adaptive planning and management process that identifies the highest priority water quality conditions within the San Diego Bay Watershed and implements strategies to address them (San Diego Bay Responsible Parties 2016).

Chula Vista Municipal Code Chapter 14.20, Storm Water Management and Discharge Control

The purpose of this ordinance is to promote the health, safety, and general welfare of the citizens of Chula Vista by prohibiting non-stormwater discharges to the stormwater conveyance system, preventing discharges to the stormwater conveyance system from disposal of materials other than stormwater, reducing pollutants in stormwater discharges to the maximum extent practicable, and reducing pollutants in stormwater discharges to achieve applicable water quality objectives for surface waters in San Diego County (Chula Vista Municipal Code Section 14.20, Storm Water Management and Discharge Control). This ordinance states that it is unlawful for any person to cause either individually or jointly, any discharge into or from the stormwater conveyance system that results in or contributes to a violation of any NPDES permit. Any person engaged in activities that may result in

pollutants entering the stormwater conveyance system shall, to the maximum extent practical, undertake all measures to reduce the risk of illegal discharges. The following requirements apply (CVMC Section 14.20):

- **Best Management Practices Implementation.** It is unlawful for any person not to comply with the BMPs and pollution control requirements established by the City or other responsible agency to eliminate or reduce pollutants entering the City stormwater conveyance system. BMPs shall be complied with throughout the life of the activity.
- **Stormwater Pollution Prevention Plan.** When the enforcement official determines that a business or business-related activity causes or may cause an illegal discharge to the stormwater conveyance system, the enforcement official may require the business to develop and implement a SWPPP. Businesses which may be required to prepare and implement a SWPPP include, but are not limited to, those which perform maintenance, storage, manufacturing, assembly, equipment operations, vehicle loading, and/or cleanup activities partially or wholly out of doors.
- **Coordination with Hazardous Materials Response Plans and Inventory.** Any activity subject to the hazardous materials inventory and response program, pursuant to Chapter 6.95 of the California Health and Safety Code, shall include provisions for compliance with this chapter in its hazardous materials response plan, including prohibitions of unlawful non-stormwater discharges and illegal discharges and provisions requiring the use of BMPs to reduce the discharge of pollutants in stormwater.
- **Impervious Surfaces.** Persons owning or operating a parking lot or an impervious surface (including, but not limited to, service station pavements or paved private streets and roads) used for automobile-related or similar purposes shall clean those surfaces as frequently and as thoroughly as is necessary, in accordance with BMPs, to prevent the discharge of pollutants to the City stormwater conveyance system. Sweepings or cleaning residue from parking lots or impervious surfaces shall not be swept or otherwise made or allowed to go into any stormwater conveyance, gutter or roadway, but must be disposed of in accordance with regional solid waste procedures and practices.
- **Compliance with NPDES Permit for Storm Water Discharges**. Each discharger subject to any NPDES permit for stormwater discharges shall comply with all requirements of such permit.

The BMP Design Manual is incorporated into this ordinance by reference. The ordinance states that no landowner or development project proponent in Chula Vista shall receive any City permit or approval for land development activity or significant redevelopment activity unless the project meets or would meet the requirements of the Development Storm Water Manual (CVMC Section 14.20).

City of Chula Vista General Plan

Chapter 8, Public Facilities and Services Element, Section 3.1, Water, Sewer and Drainage, of the City General Plan (City of Chula Vista 2021) addresses water, sewer, and drainage related issues. Objectives and policies related to water and drainage that pertain to the proposed project include the following:

Objective PFS 1: Ensure adequate and reliable water, sewer, and drainage service and facilities.

Policy PFS 1.1: Coordinate with water districts by providing growth forecast information to allow the districts to plan and design water facilities and ensure adequate supply needed to accommodate anticipated growth.

Policy PFS 1.3: Plan and design drainage facilities, and upgrade existing facilities, as necessary, to meet current needs, accommodate growth, and satisfy state and federal requirements.

Policy PFS 1.4: For new development, require on-site detention of storm water flows such that, where practical, existing downstream structures will not be overloaded. Slow runoff and maximize on-site infiltration of runoff.

Objective PFS 2: Increase efficiencies in water use, wastewater generation and its re-use, and handling of storm water runoff throughout the City through use of alternative technologies.

Policy PFS 2.1: Promote and encourage local water resource development and explore all opportunities for viable water supplies, including desalination. If appropriate, reserve suitable land areas to accommodate such potentially viable facilities and to protect groundwater sources and water storage aquifers.

Policy PFS 2.2: As part of project construction and design, assure that drainage facilities in new development incorporate stormwater runoff and sediment control, including state of-the-art technologies, where appropriate.

Policy PFS 2.3: In designing water, wastewater, and drainage facilities, limit the disruption of natural landforms and water bodies. Encourage the use of natural channels that simulate natural drainage ways while protecting property.

Chapter 9, Environmental Element, Section 3.1, Conservation, of the City General Plan (City of Chula Vista 2021) addresses water quality, flooding, and water demand related issues. Objectives and policies related to these issues that pertain to the proposed project include the following:

Objective E 2: Protect and improve water quality within surface water bodies and groundwater resources within and downstream of Chula Vista.

Policy E 2.1: Ensure safely swimmable and fishable surface waters through careful management of land uses and activities within Chula Vista.

Policy E 2.3: Educate residents, business owners and City departments about feasible methods to minimize the discharge of pollutants into natural drainages and the municipal storm drainage system.

Policy E 2.4: Ensure compliance with current federal and state water quality regulations, including the implementation of applicable NPDES requirements and the City's Pollution Prevention Policy.

Policy E 2.5: Encourage and facilitate construction and land development techniques that minimize water quality impacts from urban development.

Policy E 2.6: Maximize the protection of potable water supply resources from pollutants.

Policy E 2.7: Collaborate with other applicable jurisdictions in the development and funding of regional watershed management plans that will provide a balance between watershed protection, regional economic growth, and development of public infrastructure and services consistent with the goals and objectives of the General Plan.

Objective E 15: Minimize the risk of injury and property damage associated with flood hazards.

Policy E 15.1: Prohibit proposals to subdivide, grade, or develop lands that are subject to potential flood hazards, unless adequate evidence is provided that demonstrates that such proposals would not be adversely affected by potential flood hazards and that such proposals would not adversely affect surrounding properties. Require site-specific hydrological investigations for proposals within areas subject to potential flood hazards; and implement all measures deemed necessary by the City Engineer to avoid or adequately mitigate potential flood hazards.

Policy E 15.2: Wherever feasible, land uses, buildings, and other structures determined to be unsafe from flood hazards shall be discontinued, removed, or relocated.

Zoning Code and Growth Management Ordinance

In accordance with Chula Vista Municipal Code Section 19.80.030, development is not permitted in the City of Chula Vista that would degrade stormwater collection systems below acceptable standards. Similarly, Section 19.09, Growth Management, provides policies and programs that tie the pace of development to the provision of public facilities and improvements. Section 19.09(F) specifically requires that (1) stormwater flows and volumes shall not exceed City engineering standards as set forth in the subdivision manual and (2) the Growth Management Oversight Commission shall annually review the performance of the City's storm drain system to determine its ability to meet the goals and objectives for drainage. Section 19.09 also requires a Public Facilities Financing Plan (PFFP) and the demonstration that public services, such as police services, meet the Growth Management Oversight Commission quality of life threshold standards. The analysis of storm drain systems provided in this section, along with the public facilities financing plan, to ensure funding for any needed expansion of services, would ensure that storm drain systems are provided commensurate with development and demand.

5.9.1.2 Existing Setting

Climate

The climate of San Diego County is characterized by warm, dry summers and mild, wet winters. The average rainfall is about 10 to 13 inches per year, most of which falls between November and March. The average mean temperature for the area is approximately 65°F in the coastal zone and 57°F in the surrounding foothills (San Diego RWQCB 2021). The proposed project is located in a Mediterranean climate region with seasonally influenced precipitation. Seasons consist of hot, dry summers and cooler, wetter winters, although San Diego is more arid than most areas with a similar climate classification. Global climate change is expected to cause a future warming trend in Southern California even under moderate emissions scenarios; however, there is no clear trend in annual precipitation. Current climate projections suggest an increase in extreme events in the San Diego region in the future, with 16% fewer rainy days and 8% more rainfall during the biggest rainstorms (San Diego Foundation 2014).

Drainage

The project site is located within the Telegraph Canyon Creek watershed of the larger San Diego Bay watershed (San Diego RWQCB 2021). However, the project site drains directly into San Diego Bay. The specific drainage patterns of Planning Area A (Figure 4-2, Site Plan) are not provided as part of this EIR, as the drainage conditions would not be altered as a result of the proposed project. With respect to Planning Areas B-1 and B-2, approximately 0.3 acres of off-site run-on occurs as sheetflow in the northeast portion of the site. Planning Area B is roughly split

into northern and southern portions with respect to stormwater flow. The north half of the site is conveyed to a 36-inch storm drain on the north side of G Street, which in turn feeds into a 54-inch reinforced concrete pipe (RCP) and then into an existing slough northwest of the site. The slough is connected to San Diego Bay. The southern half of the site is conveyed to the southwest corner and into an existing 60-inch storm drain beneath H Street, which in turn feeds into a 72-inch and 84-inch RCP under H Street, followed by outlets directly into San Diego Bay at the Chula Vista Marina (Figure 5.9-1, Existing Drainage Conditions) (Appendix I-1, I-2).

Water Quality

As previously discussed for project drainage, stormwater runoff from the project site flows directly into the San Diego Bay Shoreline and Chula Vista Marina. Based on the San Diego RWQCB Basin Plan, beneficial uses of water bodies form the cornerstone of water quality protection under the Basin Plan. Once beneficial uses are designated, appropriate water quality objectives can be established and programs that maintain or enhance water quality can be implemented to ensure the protection of beneficial uses. Beneficial uses are defined as the uses of water necessary for the survival or well-being of humans, plants, and wildlife. These uses of water serve to promote the tangible and intangible economic, social, and environmental goals of mankind. Beneficial uses of San Diego Bay include industrial service supply, navigation, contact water recreation, non-contact recreation, commercial and sports fishing, preservation of biological habitats of special significance, estuarine habitat, wildlife habitat, rare/threatened/endangered species, marine habitat, migration of aquatic organisms, spawning/reproduction/early development, and shellfish harvesting (San Diego RWQCB 2021).

San Diego Bay Shoreline and Chula Vista Marina are listed as impaired waterbodies, per Section 303(d) of the CWA. As discussed in Section 5.9.1.1, Regulatory Framework, the SWRCB maintains and updates a list of impaired water bodies (i.e., water bodies that do not meet state and federal water quality standards). The state is required to prioritize waters/watersheds for development of TMDLs. San Diego Bay as a whole is impaired with mercury, polycyclic aromatic hydrocarbons (PAHs), and polychlorinated biphenyls (PCBs). The San Diego Bay Shoreline at the Chula Vista Marina is impaired with copper. TMDLs have not been established for these pollutants. At the watershed scale, Telegraph Canyon Creek is listed as impaired with nitrogen and selenium. Similarly, TMDLs have not been established for these pollutants. No plans are currently in-place to restore the water quality of Telegraph Canyon Creek (SWRCB 2017, 2023; EPA 2023; Appendix I-2).

As discussed in Section 5.9.1.1, the Regional MS4 Permit for the San Diego Region required local co-permittees to implement a comprehensive Urban Runoff Management Program at both the jurisdictional and watershed level. In compliance with the Regional MS4 Permit, Chula Vista prepared a Jurisdictional Urban Runoff Management Program. Additionally, the City, along with seven other municipalities, San Diego County, and the Unified Port District, prepared the San Diego Bay Watershed Urban Runoff Management Program and San Diego Bay Watershed Management Area WQIP, which are collaborative and comprehensive watershed plans for the San Diego Bay Watershed. Each of these watershed planning programs have been developed to identify and prioritize areas where local water quality can be improved and provide solutions to mitigate problems attributable to local urban runoff.

Groundwater

Groundwater is present at a depth of approximately 20 to 35 feet beneath Planning Area A, and 2 to 10 feet beneath Planning Areas B-1 and B-2. Three shallow groundwater zones are present beneath the site, including:

- Zone A – extends to a depth of approximately 25 feet below ground surface (bgs), which generally corresponds to the artificial fill and Bay Deposits.

- Upper Zone B – extends approximately 25 to 55 feet bgs, which generally refers to the upper portion of the Bay Point Formation.
- Lower Zone B – extends approximately 55 to 125 feet bgs, which generally refers to the lower portion of the Bay Point Formation (Appendices H-1, H-2, and H-3).

An approximately 20-foot thick clay layer separates these shallow aquifers from deeper formations. Potable water is present in a deeper aquifer known as the San Diego Formation. A deep monitoring well located east of the project site (well SDSW-3), immediately east of I-5, is screened within the San Diego Formation at depths of 145 to 204 feet bgs and 690 to 800 feet bgs (Blankenship 1997).

The Otay Water District and Sweetwater Authority provide water for the City of Chula Vista (City of Chula Vista 2023b). The Otay Water District imports surface water from regional water importers, including the San Diego County Water Authority, the Metropolitan Water District of Southern California, and the Helix Water District (Otay Water District 2023). The Sweetwater Authority owns and operates Loveland Reservoir, Sweetwater Reservoir, a brackish groundwater desalination facility, and deep freshwater wells (Sweetwater Authority 2023).

The Sweetwater Authority produces groundwater from the Coastal Plain of San Diego (CPSD) Groundwater Basin, identified in the California DWR Bulletin 118 as Basin Number 9-033. The Sweetwater Authority adopted an interim groundwater management plan in November 2001 that governs groundwater management until a groundwater management plan could be prepared in accordance with Water Code Section 10750 (Assembly Bill [AB] 3030). However, in 2014, the State of California passed SGMA, which recognizes the importance of groundwater to California's overall water supplies and addresses undesirable results caused by overreliance on groundwater. DWR has designated the CPSD Basin a low priority basin, per section 10722.4 of the Water Code. Because DWR has not identified the CPSD Basin as being overdrafted, subject to critical conditions of overdraft, or projected to become overdrafted if present management conditions continue, a Groundwater Sustainability Plan is not required for the CPSD Basin (HDR 2021a).

The principal aquifer units of the CPSD Basin include recent alluvium with offshore marine sediment, Quaternary marine and non-marine deposits, and the San Diego Formation. Although groundwater occurs in the overlying sedimentary deposits, the San Diego Formation is the principal aquifer within the basin. The CPSD Basin is bounded to the east by the La Nacion Fault, to the south by the U.S./Mexico International Border, to the west by San Diego Bay, and to the north by the Mission Valley Basin. Basin recharge is derived from seasonal runoff from precipitation, discharge from the Sweetwater and Loveland Reservoirs, and underflow from the reservoirs. Within the CPSD Basin, the Sweetwater Authority operates the National City Wells, which produce potable groundwater (total dissolved solids approximately 600 milligrams per liter) and the Desal Facility, which produces drinking water from brackish groundwater (total dissolved solids between 1,600 and 2,500 milligrams per liter). Both well fields pump from the San Diego Formation. The National City Wells consist of three wells: Nos. 2, 3, and 4. Well Nos. 3 and 4 operate daily, while the oldest well, No. 2 serving as a backup. From 2010 to 2020, the Sweetwater Authority has produced an average of 1,740 acre-feet per year from the National City Wells (HDR 2021a).

Flooding

Excluding the northern approximate one-quarter of the project site, the majority of the site is located within Federal Emergency Management Agency (FEMA) Zone X, which is an area with a 0.2% annual chance flood hazard (i.e., 500-year flood hazard), or area of 1% annual chance flood (i.e., 100-year flood) with average depth less than one foot, or with drainage areas of less than one square mile. The northern portion of the site is located within Zone X, Area of Minimal Flood Hazard (Figure 5.9-2, FEMA Flood Zones) (FEMA 2023).

The project site is not located within a tsunami runup area (CGS 2022, County of San Diego 2023).

5.9.2 Thresholds of Significance

The significance criteria used to evaluate the project impacts to hydrology and water quality are based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to hydrology and water quality would occur if the project would:

1. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.
2. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.
3. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
    a. result in substantial erosion or siltation on or off site;
    b. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;
    c. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
    d. impede or redirect flood flows.
4. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.
5. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

5.9.3 Impacts

This impact analysis assumes that the proposed project would be constructed and operated in compliance with the policies and regulations applicable to hydrology and water quality, as described above in Section 5.9.1.1, Regulatory Framework. The results of a project hydrology report (Appendix I-1), water quality report (Appendix I-2), and water supply and infrastructure report (Appendix I-3) were used to characterize the existing environmental setting in the study area, as described above in Section 5.9.1.2, Existing Setting, and to identify any hydrologic issues that could affect construction or operation of the proposed project. Impacts have been evaluated with respect to the thresholds of significance, as described above. In the event adverse environmental impacts would occur even with consideration of applicable policies, regulations, and standard construction practices, impacts would be potentially significant, and mitigation measures are provided to reduce impacts to less than significant.

The project has identified project design features (PDFs) (see Section 4.4.5, Project Design Features) that would be implemented during construction to avoid or minimize impacts. PDF-3, which indicates that new construction should minimize impervious surfaces; PDF-8, which indicates that landscaping should be drought tolerant to reduce water demand; and PDF-10, which indicates that fugitive dust control measures should be in-place during construction, apply to the proposed project. Where applicable, this practice and its effectiveness in avoiding or minimizing impacts related to hydrology and water quality are described below.

The proposed project involves the preparation of a Specific Plan that would govern future development within the three Planning Areas (A, B-1, and B-2) at the project site. No new grading and construction would occur in Planning Area A. Planning Areas B-1 and B-2 would include minor grading, utility installation, paving, and building construction. New land use designations would include Commercial Retail, Commercial Visitor, Commercial Office, Light Industrial, Regional Technology Park, and Business Park Flex, as described in more detail in Table 4-1, Proposed Land Uses. It is anticipated that construction of the project would occur over approximately 18 months, beginning in September 2024.

Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Construction

Planning Areas B-1 and B-2 would include minor grading, utility installation, paving, and building construction. In the absence of proper soil management, grading and construction could result in wind and water erosion and associated sedimentation of San Diego Bay. Construction-related activities that primarily result in sediment releases are related to exposing previously stabilized soils to potential mobilization by rainfall/runoff and wind. Erosion and sedimentation affects water quality and interferes with photosynthesis; oxygen exchange; and the respiration, growth, and reproduction of aquatic species. Additionally, other pollutants, such as nutrients, trace metals, and hydrocarbons, can attach to sediment and be transported downstream, which could contribute to degradation of water quality.

Non-sediment-related pollutants that are also of concern during construction relate to construction materials and non-stormwater flows and include construction materials (e.g., paint); chemicals, liquid products, and petroleum products used in construction or the maintenance of heavy equipment; and concrete-related pollutants.

Construction impacts would be minimized through compliance with the Small MS4 Permit and the SWRCB's CGP, which is the NPDES General Permit for Storm Water Associated with Construction Activities (Construction Stormwater General Permit Order 2022-0057-DWQ). Because the proposed project is greater than 1 acre in size, the applicant would be required to submit a Notice of Intent to the SWRCB in order to obtain approval to complete construction activities under the CGP. This permit requires the discharger to perform a risk assessment for the proposed development (with differing requirements based upon the determined level) and to prepare and implement a SWPPP. A Construction Site Monitoring Program that identifies monitoring and sampling requirements during construction is a required component of the SWPPP. The SWPPP is also required to include construction-phase BMPs to be implemented. Typical BMPs that would be implemented during grading and construction of the proposed project that would minimize degradation of surface water quality include the following.

Erosion Control

- Physical soil stabilization through hydraulic mulch, soil binders, straw mulch, bonded and stabilized fiber matrices, compost blankets, and erosion control blankets.
- Contain and securely protect stockpiled materials from wind and rain at all times, unless actively being used.
- Soil roughening of graded areas to slow runoff, enhance infiltration, and reduce erosion.
- Vegetative stabilization through temporary seeding and mulching to establish interim vegetation.
- Wind erosion (dust) control through the application of water or other dust palliatives as necessary to prevent and alleviate dust nuisance.

Sediment Control

- Perimeter protection to prevent sediment discharges (e.g., silt fences, fiber rolls, gravel bag berms, sand bag barriers, and compost socks)
- Storm drain inlet protection
- Sediment capture and drainage control through sediment traps and sediment basins
- Velocity reduction through check dams, sediment basins, and outlet protection/velocity dissipation devices
- Reduction in off-site sediment tracking through stabilized construction entrance/exit, construction road stabilization, and/or entrance/exit tire wash.
- Slope interruption at prescribed intervals (e.g., fiber rolls, gravel bag berms, sand bag berms, compost socks, biofilter bags)

Waste and Materials Management

- Management of the following types of materials, products, and wastes: solid, liquid, sanitary, concrete, hazardous, and equipment-related wastes. Management measures include covered storage and secondary containment for material storage areas, secondary containment for portable toilets, covered dumpsters, dedicated and lined concrete washout/waste areas, proper application of chemicals, and proper disposal of all wastes.
- A spill response and prevention program will be incorporated as part of the SWPPP and spill response materials will be available and conspicuously located at all times on site.

Non-Stormwater Management

- BMPs or good housekeeping practices to reduce or limit pollutants at their source before they are exposed to stormwater, including such measures as water conservation practices, vehicle and equipment cleaning and fueling practices, illicit connection/discharge elimination, and concrete curing and finishing. All such measures will be recorded and maintained as part of the project SWPPP.

Training and Education

- Inclusion of CGP-defined Qualified SWPPP Developers and Qualified SWPPP Practitioners. These staff shall have required certifications and shall attend SWRCB sponsored training.
- Training of individuals responsible for SWPPP implementation and permit compliance, including contractors and subcontractors
- Signage (bilingual, if appropriate) to address SWPPP-related issues (such as site cleanup policies, BMP protection, and washout locations)

Inspections, Maintenance, Monitoring, and Sampling

- Performing routine site inspections and inspections before, during (for storm events > 0.5 inches), and after storm events
- Where applicable, preparing and implementing Rain Event Action Plans prior to any storm event with 50% probability of producing 0.5 inches of rainfall, including performing required preparatory procedures and site inspections.

- Implementing maintenance and repairs of BMPs as indicated by routine, storm-event, and Rain Event Action Plan inspections.
- Implementation of the Construction Site Monitoring Plan for non-visible pollutants if a leak or spill is detected.
- Where applicable, sampling of discharge points for turbidity and pH at minimum three times per qualifying storm event and recording and retention of results.

In addition, in compliance with the CGP, temporary sediment traps would be constructed for separate work areas/staging areas (i.e., north and south of the river) that would remain in a mass graded condition for a temporary period of time (Figure 5.9-3, Proposed Drainage Conditions).

Based on the shallow depth to groundwater beneath Planning Areas B-1 and B-2, dewatering may be necessary if groundwater is encountered during temporary excavations. If groundwater is encountered and displaced, the pumped groundwater cannot be discharged into surface waters unless the City applies for a separate groundwater dewatering permit. Dewatering BMPs, such as dewatering tanks or weir tanks that would temporarily hold the excavated groundwater, may be used during the construction phase. All dewatering would be conducted in compliance with the CGP (Order 2022-0057-DWQ) and the San Diego RWQCB's General Waste Discharge Requirements for Groundwater Extraction Discharges to Surface Waters within the San Diego Region (Order No. R9-2015-0013, NPDES No. CAG919003). In general, the CGP authorizes other construction-related non-stormwater discharges (such as dewatering) as long as they (a) comply with Section III.C of the CGP, (b) do not cause or contribute to violation of any water quality standards, (c) do not violate any other provisions of the CGP, (d) do not require a non-stormwater permit as issued by some Regional Water Boards, and (e) are not prohibited by a Basin Plan provision.

As discussed in Section 5.8, Hazards and Hazardous Materials, chemicals stored and used on-site and immediately off-site during manufacturing operations have been found in the soil, soil gas, and groundwater as reported in environmental investigation reports and groundwater monitoring reports. Discharge of these chemicals of concern to the environment constitutes a discharge of waste, as defined in Water Code section 13050, subsection (d). In 1998, the San Diego RWQCB issued Cleanup and Abatement Order (CAO) No. 98-08 for the Rohr facility to abate discharges from its facility. CAO No. 98-08 includes directives to (1) conduct a site-wide environmental site assessment, (2) conduct a comprehensive storm water runoff sampling program, (3) conduct a comprehensive storm water conveyance system investigation, (4) perform a site-wide data compilation and evaluation, and (5) conduct interim remedial actions. The San Diego RWQCB subsequently issued CAO R9-2021-0042 in July 2021, which includes directives and timelines to remediate soil, soil gas, and groundwater at the property (Appendix H-3).

On-site structures in Planning Areas B-1 and B-2 have been demolished, all building debris has been hauled off-site to appropriate disposal facilities, and Raytheon Technologies Corporation, of which Rohr is a wholly owned company, is completing soil and groundwater remediation in accordance with San Diego RWQCB CAO R9-2021-0042. Soil remediation would be completed prior to initiation of project construction, and under the guidance of the San Diego RWQCB and San Diego County Department of Environmental Health and Quality, Hazardous Materials Division. Minor amounts of site grading and trenching for utilities installation would occur as part of project construction. Because soil contamination would be remediated to San Deigo RWQCB and San Diego Department of Environmental Health and Quality standards prior to project construction, minor grading and trenching would not encounter contaminated soil that could result in a significant hazard to on-site construction personnel or the environment. Project construction in compliance with CAO R9-2021-0042 would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

Through implementation of the requirements outlined in the CGP and CAO R9-2021-0042, construction-related impacts to surface water and groundwater would be minimized and impacts would be **less than significant**.

Operations

Once operational, Planning Area A of the Specific Plan development would remain unchanged with respect to impervious surfaces. However, development of Planning Areas B-1 and B-2 represent an increase in impervious surfaces associated with proposed industrial, mixed use, and business park development, as the project site is recently graded and unpaved. The Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP) for the project (Appendix I-2) assumed that the total new and/or replaced impervious surface area within Planning Areas B-1 and B-2 would be 958,269 square feet. It can be assumed that urban land uses, including impervious surfaces such as parking lots and buildings, would be a source of pollution from incidental spills of vehicle oils and other chemicals, including incidental emissions of heavy metals from vehicle brakes, that can be conveyed by stormwater and landscape irrigation flows.

The impervious surfaces would prevent polluted surface waters from absorbing into the ground surface. The on-site watersheds following grading are depicted on Figure 5.9-3. During storm events, pollutants from paved areas lacking in proper stormwater controls and BMPs could enter the municipal storm drain system, before eventually being discharged to San Diego Bay. Between periods of rainfall, surface pollutants tend to accumulate, and runoff from the first significant storm of the year ("first flush") would likely have the largest concentration of pollutants.

As discussed in Section 5.9.1.2, San Diego Bay Shoreline and Chula Vista Marina are listed as impaired waterbodies, per Section 303(d) of the CWA. San Diego Bay as a whole is impaired with mercury, PAHs, and PCBs. The San Diego Bay Shoreline at the Chula Vista Marina is impaired with copper. TMDLs have not been established for these pollutants. At the watershed scale, Telegraph Canyon Creek is listed as impaired with nitrogen and selenium. Similarly, TMDLs have not been established for these pollutants.

As discussed in Section 5.9.1.1, the Regional MS4 Permit for the San Diego Region required local co-permittees to implement a comprehensive Urban Runoff Management Program at both the jurisdictional and watershed level. In compliance with the Regional MS4 Permit, Chula Vista prepared a Jurisdictional Urban Runoff Management Program. Additionally, the City, along with seven other municipalities, San Diego County, and the Unified Port District, prepared the San Diego Bay Watershed Urban Runoff Management Program and San Diego Bay Watershed Management Area WQIP, which are collaborative and comprehensive watershed plans for the San Diego Bay Watershed. Each of these watershed planning programs have been developed to identify and prioritize areas where local water quality can be improved and provide solutions to mitigate problems attributable to local urban runoff. In addition, the City BMP Design Manual addresses updated on-site post-construction stormwater requirements for Standard Projects and PDPs, and provides updated procedures for planning, preliminary design, selection, and design of permanent storm water BMPs, based on the performance standards presented in the MS4 Permit. Because the project would create and/or replace 5,000 square feet or more of impervious surfaces, the proposed project classifies as a PDP. As a result, a PDP Stormwater Quality Management Plan (SWQMP) has been prepared for the project (Appendix I-2).

Pursuant to the City BMP Design Manual, the standard for storm water pollutant control is retention of the 24-hour 85th percentile storm volume, defined as the event that has a precipitation total greater than or equal to 85% of all daily storm events larger than 0.01 inches, over a given period of record, in a specific area or location. For situations where onsite retention of the 85th percentile storm volume is technically not feasible, biofiltration must be provided to satisfy specific "biofiltration standards". These standards consist of a set of siting, selection, sizing,

design and operation and maintenance criteria that must be met for a BMP to be considered a "biofiltration BMP". If biofiltration is infeasible, the project must implement flow-through BMPs on-site and participate in an off-site alternative compliance project (City of Chula Vista 2023a).

Based on the PDP SWQMP, the proposed site drainage conveyance network would include trench drains, grate inlets, B-Inlets, ribbon gutters, earthen swales in the westerly dispersion area, and storm drains. The majority of the site drainage would be collected and then directed to modular wetland units for water treatment. Stormwater runoff would enter the modular wetland units via pipe inflows and curb openings. One 3,130-square foot biofiltration basin would be located at the northeast corner of the site (Figure 5.9-3). The basin would be lined because the project geotechnical engineer determined the subsurface soils are not suitable for stormwater infiltration. The biofiltration basin would include 18 inches of engineered sandy loam, growing media on top of a minimum depth of 12 inches of gravel. In addition to these biofiltration layers, a barrier/filter layer would also be installed beneath the soil media, and above the gravel layer. The filter layer would include a 3-inch layer of washed sand on top of a 3 inch layer of #8 choking stone (Appendix I-2).

No other biofiltration basins are proposed due to subsurface soil contamination in other areas of the site, as well as shallow groundwater conditions (i.e., locally as shallow as 2 feet). As a result, vegetated modular wetland units would be installed to treat stormwater runoff across the majority of the site, in combination with two stormwater runoff dispersion areas and a biofiltration planter for stormwater retention. The volume retention requirements would be met on a composite basis rather than on a drainage management area basis. Harvest and re-use would not be feasible for this project. Proposed structural BMPs would be verified by the City at the completion of construction. PDP BMPs must be maintained into perpetuity. In addition, because the project proposes to treat an equivalent or larger amount of impervious surface due to treating the run-on, the perimeter areas of the site that could not be graded to drain to on-site treatment BMPs are addressed through a proposed treatment swap along the eastern portion of the property, as illustrated in Figure 5.9-3 (Appendix I-2).

The proposed loading docks would be depressed areas below the building finish floor and would include trench drains to collect stormwater runoff in those areas. Trench drains would also be used on the east side of the site, within the SDG&E easement. The project area east of the SDG&E easement drains is not proposed to be disturbed by the project. Rather, only re-striping is proposed in that area and that portion of the drainage area is considered run-on (Appendix I-2).

Similar to existing conditions, the site drainage would be roughly split north and south, with the north side being conveyed to the 36-inch stub, and then westerly transitioning to the 54-inch RCP, ultimately discharging into an existing slough northwest of the site. The slough is directly connected to San Diego Bay. Stormwater runoff on the south side of the site would be conveyed to the H Street 60-inch storm drain, and then southwesterly to an 84-inch RCP that outlets directly to San Diego Bay (Appendix I-2).

In addition, the project would include several sustainability design features to reduce potential water usage, reduce paving, and reduce fugitive dust emissions during construction. The proposed sustainability features related to hydrology and water quality include the following:

PDF-3 Where possible, developments should reduce the amount of site paving; provide paving material that stays cool and allows water to filter through the soil; increase landscaped areas; and provide shade throughout the site in order to reduce ambient temperatures and solar heat gain on constructed surfaces.

PDF-8 To maximize water efficiency, new landscape designs should incorporate landscape material that is drought tolerant, native, and/ or water efficient in accordance with the Chula Vista Landscape Water Conservation Ordinance (CVMC 20.12). The use of California-friendly plants, shrubs and trees is also encouraged.

PDF-10 Standard construction practices that would be employed to reduce fugitive dust emissions include watering of the active sites two times per day, depending on weather conditions. Construction of Project components would be subject to SDAPCD Rule 55 – Fugitive Dust Control. Compliance with Rule 55 would limit fugitive dust that may be generated during grading and construction activities.

As previously stated, because soil contamination would be remediated to San Deigo RWQCB and San Diego Department of Environmental Health and Quality standards prior to project construction, minor grading and trenching would not encounter contaminated soil that could result in a significant hazard to on-site construction personnel or the environment. Project construction in compliance with CAO R9-2021-0042 would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

With incorporation of water quality BMPs and project design features, as described above for construction and operation, the project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Impacts would be **less than significant**.

Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

As discussed in Section 5.9.1.2, the Otay Water District and Sweetwater Authority provide water for the City of Chula Vista. Only the Sweetwater Authority uses groundwater as a partial water supply source. Otay Water District supplies are limited to surface water. The Sweetwater Authority produces groundwater from the CPSD Groundwater Basin, which has been designated a low priority basin by DWR. Because DWR has not identified the CPSD Basin as being overdrafted, subject to critical conditions of overdraft, or projected to become overdrafted if present management conditions continue, a Groundwater Sustainability Plan is not required for the CPSD Basin.

A water demand analysis has been prepared for Planning Areas B-1 and B-2 of the project (Appendix I-3, Water Supply and Demand Report). Planning Area A is undergoing renovation and is on a separate track for occupancy of its space. Because the exact uses of Planning Areas B-1 and B-2 are uncertain, water demand estimates were completed (1) based on Sweetwater Authority standard land uses, which would provide the low end of expected water use, and (2) based on a more intensive use of water to accommodate potential higher uses within the project. Based on Sweetwater Authority standard land uses, the project water demand would be 64,093 gallons per day (gpd). Based on more intensive water use, the demand would be 84,718 gpd. The existing water demand for Planning Areas B-1 and B-2 is 70,417 gpd; therefore, the net increase in water demand for the project, using the higher water demand, would be 14,301 gpd, which is equivalent to 16.0 acre-feet per year.

Based on Sweetwater Authority's Water Distribution System 2020 Master Plan, dated December 2021, the annual water production for the year ending in June 2020 was 16,458 acre-feet (HDR 2021b). Thus, the additional water demand estimated for the Yards at the Bay project is 0.10 percent of the total water production for the Sweetwater Authority (based on 2020 data), including surface water and groundwater supplies. This additional water supply is expected to be accounted for in the typical increase in normal growth in the Sweetwater Authority service area, as

well as in the updated projections which Sweetwater Authority makes as part of its 5-year update of its Urban Water Management Plan (Appendix I-3).

Based on 1) the low priority status of the CPSD Groundwater Basin, 2) the numerous other surface water sources available for use by the Otay Water District and Sweetwater Authority, and 3) the stated ability of the Sweetwater Authority to supply water throughout their service area in association with typical increased growth, the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Impacts would be **less than significant**.

Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

result in substantial erosion or siltation on or off site;

As previously discussed for operational water quality impacts, the project site is currently unpaved and pervious. Therefore, proposed Specific Plan development would result in an increase in impervious surfaces. However, the project would not substantially alter the existing drainage pattern of the site or area. Similar to existing conditions, the site drainage would be roughly split north and south, with the north side being conveyed to the 36-inch stub, and then westerly transitioning to the 54-inch RCP, ultimately discharging into an existing slough northwest of the site. The slough is directly connected to San Diego Bay. Stormwater runoff on the south side of the site would be conveyed to the H Street 60-inch storm drain, and then southwesterly to an 84-inch RCP that outlets directly to San Diego Bay (Figure 5.9-3) (Appendix I-1 and I-2). However, the proposed drainage plan would direct more flow to the south because there is more capacity in the on-site storm drain stub on the south side of the site. The north storm drain would connect to a 36-inch stub, whereas the south storm drain would connect to a 60-inch stub.

A project-specific drainage analysis calculated the 100-year storm flow for the proposed drainage system, under existing and proposed drainage conditions. The analysis concluded that the total peak 100-year flows under post-project conditions would be less than the pre-project conditions, which would alleviate downstream pipe capacity concerns for the north outlet, since the stub for the outlet has more pipe conveyance capacity than the storm drain stub for the north outlet. As a result, the proposed storm drain system would be sufficient to satisfy Chula Vista criteria in the post-development condition (Appendix I-1) and would not result in erosive scour and associated siltation of San Diego Bay. Impacts would be **less than significant.**

substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;

As discussed for the previous threshold, the project stormwater analysis (Appendix I-1) concluded that the total peak 100-year flows under post-project conditions would be less than the pre-project conditions. As a result, the rate or amount of surface runoff would not increase and on- and off-site flooding would not occur. Impacts would be **less than significant**.

create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

As discussed for the previous threshold, the project stormwater analysis (Appendix I-1) concluded that the total peak 100-year flows under post-project conditions would be less than the pre-project conditions. As a result, post-development stormwater runoff would not create or contribute runoff water which would exceed the capacity of

existing or planned stormwater drainage systems. In addition, as previously discussed, with incorporation of water quality BMPs and project design features, as described above, the project would not provide substantial additional sources of polluted runoff. Impacts would be **less than significant**.

impede or redirect flood flows?

As discussed in Section 5.9.1.2, the majority of the site is located within FEMA Zone X, which is an area with a 0.2% annual chance flood hazard (i.e., 500-year flood hazard), or area of 1% annual chance flood (i.e., 100-year flood) with average depth less than one foot, or with drainage areas of less than one square mile. The northern portion of the site is located within Zone X, Area of Minimal Flood Hazard (Figure 5.9-2). Because the project would not be developed within a 100-year Special Flood Hazard Area, as designated by FEMA on a Flood Hazard Boundary Map or Flood Insurance Rate Map, the potential for proposed structures in the southern portion of the site to impede or redirect flood flows is low. Impacts would be **less than significant**.

In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

The project site is not located within a 100-year Special Flood Hazard Area or tsunami runup area. In addition, the project site is not located immediately adjacent to an enclosed body of water susceptible to seiches. As a result, project development would not risk release of pollutants due to project inundation. Impacts would be **less than significant**.

Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Construction

The project would be required to comply with the CGP requiring preparation and implementation of a SWPPP to control runoff from construction work sites. The SWPPP must include BMPs to address transport of sediment and protect properties from erosion, flooding, or the deposition of mud, debris, or construction-related pollutants. Implementation of BMPs, including physical barriers to prevent erosion and sedimentation, construction of sedimentation basins, limitations on work periods during storm events, use of infiltration swales, protection of stockpiled materials, and a variety of other measures would substantially reduce the potential for impacts to surface water quality from occurring during construction. In addition, because soil contamination would be remediated to San Deigo RWQCB and San Diego Department of Environmental Health and Quality standards prior to project construction, in compliance with CAO R9-2021-0042, minor grading and soil trenching for utilities would not violate any water quality objectives or waste discharge requirements. Therefore, the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, and impacts from construction would be **less than significant**.

Operations

The Sweetwater Authority produces groundwater from the CPSD Groundwater Basin, which has been designated a low priority basin by DWR. Because DWR has not identified the CPSD Basin as being overdrafted, subject to critical conditions of overdraft, or projected to become overdrafted if present management conditions continue, a Groundwater Sustainability Plan is not required for the CPSD Basin.

The project is subject to the requirements of the San Diego RWQCB Basin Plan. Compliance with the Basin Plan is ensured through WDRs for all surface water discharges including stormwater. As discussed in Section 5.9.1.1, the Regional MS4 Permit for the San Diego Region required local co-permittees to implement a comprehensive Urban Runoff Management Program at both the jurisdictional and watershed level. In compliance with the Regional MS4 Permit, Chula Vista prepared a Jurisdictional Urban Runoff Management Program. Additionally, the City, along with seven other municipalities, San Diego County, and the Unified Port District, prepared the San Diego Bay Watershed Urban Runoff Management Program and San Diego Bay Watershed Management Area WQIP, which are collaborative and comprehensive watershed plans for the San Diego Bay Watershed. In addition, the City BMP Design Manual addresses updated on-site post-construction stormwater requirements for Standard Projects and PDPs, and provides updated procedures for planning, preliminary design, selection, and design of permanent storm water BMPs, based on the performance standards presented in the MS4 Permit.

Based on the PDP SWQMP, the majority of the site drainage would be collected and then directed to modular wetland units for water treatment. One 3,130-square foot biofiltration basin would be located at the northeast corner of the site (Figure 5.9-3). No other biofiltration basins are proposed due to subsurface soil contamination in other areas of the site, as well as shallow groundwater conditions (i.e., locally as shallow as 2 feet). As a result, vegetated modular wetland units would be installed to treat stormwater runoff across the majority of the site, in combination with two stormwater runoff dispersion areas and a biofiltration planter for stormwater retention. Proposed structural BMPs would be verified by the City at the completion of construction. PDP BMPs must be maintained into perpetuity. In addition, because the project proposes to treat an equivalent or larger amount of impervious surface due to treating the run-on, the perimeter areas of the site that could not be graded to drain to on-site treatment BMPs are addressed through a proposed treatment swap along the eastern portion of the property, as illustrated in Figure 5.9-3 (Appendix I-2). Compliance with the NPDES MS4 permit and LID requirements would ensure that the Project is consistent with the Basin Plan's water quality objectives. As a result, impacts would be **less than significant**.

5.9.4 Level of Significance Prior to Mitigation

The proposed project would have a **less-than-significant impact** on hydrology and water quality.

5.9.5 Mitigation Measures

No mitigation measures are required.

5.9.6 Level of Significance After Mitigation

No mitigation measures are required and impacts to hydrology and water quality would be **less than significant**.



SOURCE: Appendix I-2

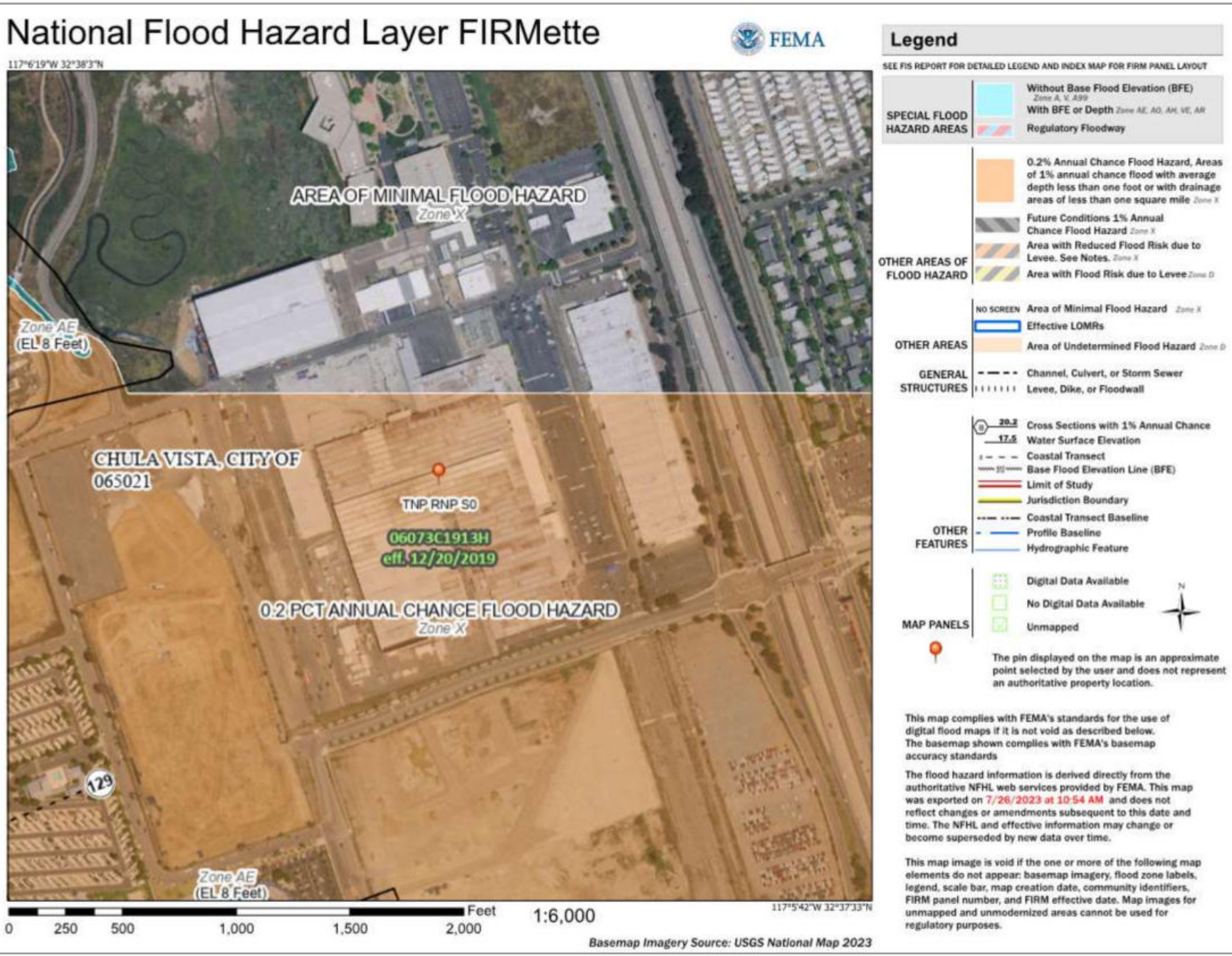
FIGURE 5.9-1

Existing Drainage Conditions

Rohr Wohl Specific Plan

DUDEK

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SOURCE: FEMA 2023

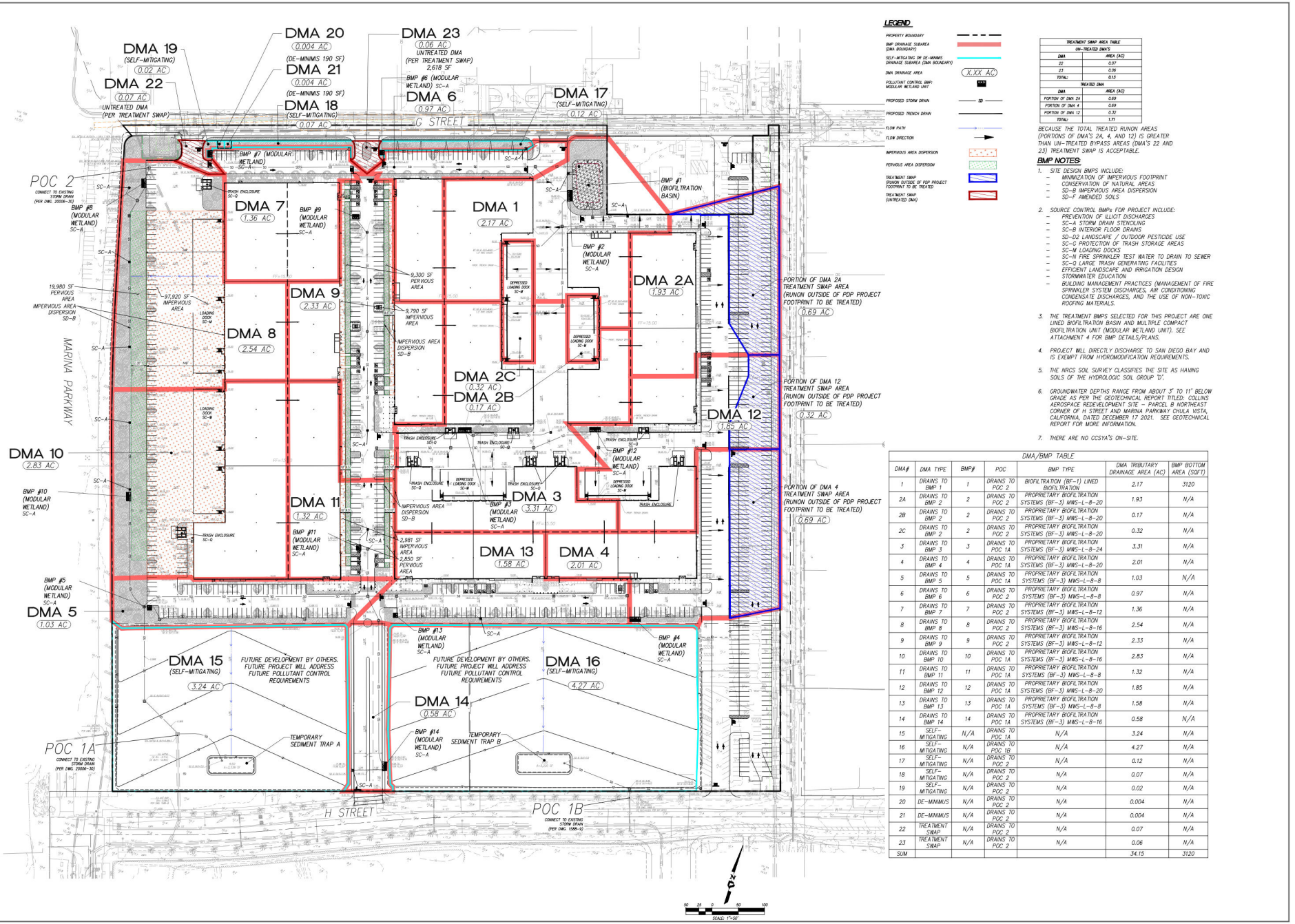
FIGURE 5.9-2

FEMA Flood Zones

Rohr Wohl Specific Plan

DUDEK

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TREATMENT SWAP AREA TABLE	
UN-TREATED DMA'S	
DMA	AREA (AC)
22	0.07
23	0.06
TOTAL:	0.13
TREATED DMA	
DMA	AREA (AC)
PORTION OF DMA 2A	0.69
PORTION OF DMA 4	0.69
PORTION OF DMA 12	0.32
TOTAL:	1.71

BECAUSE THE TOTAL TREATED RUNON AREAS (PORTIONS OF DMA'S 2A, 4, AND 12) IS GREATER THAN UN-TREATED BYPASS AREAS (DMA'S 22 AND 23) TREATMENT SWAP IS ACCEPTABLE.

BMP NOTES:

1. SITE DESIGN BMPS INCLUDE:
   - MINIMIZATION OF IMPERVIOUS FOOTPRINT
   - CONSERVATION OF NATURAL AREAS
   - SD-B IMPERVIOUS AREA DISPERSION
   - SD-F AMENDED SOILS
2. SOURCE CONTROL BMPs FOR PROJECT INCLUDE:
   - PREVENTION OF ILLICIT DISCHARGES
   - SC-A STORM DRAIN STENCILING
   - SC-B INTERIOR FLOOR DRAINS
   - SD-02 LANDSCAPE / OUTDOOR PESTICIDE USE
   - SC-C PROTECTION OF TRASH STORAGE AREAS
   - SC-M LOADING DOCKS
   - SC-N FIRE SPRINKLER TEST WATER TO DRAIN TO SEWER
   - SC-O LARGE TRASH GENERATING FACILITIES
   - EFFICIENT LANDSCAPE AND IRRIGATION DESIGN
   - STORMWATER EDUCATION
   - BUILDING MANAGEMENT PRACTICES (MANAGEMENT OF FIRE SPRINKLER SYSTEM DISCHARGES, AIR CONDITIONING CONDENSATE DISCHARGES, AND THE USE OF NON-TOXIC ROOFING MATERIALS.
3. THE TREATMENT BMPS SELECTED FOR THIS PROJECT ARE ONE LINED BIOFILTRATION BASIN AND MULTIPLE COMPACT BIOFILTRATION UNIT (MODULAR WETLAND UNIT). SEE ATTACHMENT 4 FOR BMP DETAILS/PLANS.
4. PROJECT WILL DIRECTLY DISCHARGE TO SAN DIEGO BAY AND IS EXEMPT FROM HYDROMODIFICATION REQUIREMENTS.
5. THE NRCS SOIL SURVEY CLASSIFIES THE SITE AS HAVING SOILS OF THE HYDROLOGIC SOIL GROUP 'D'.
6. GROUNDWATER DEPTHS RANGE FROM ABOUT 3' TO 11' BELOW GRADE AS PER THE GEOTECHNICAL REPORT TITLED: COLLINS AEROSPACE REDEVELOPMENT SITE – PARCEL B NORTHEAST CORNER OF H STREET AND MARINA PARKWAY CHULA VISTA, CALIFORNIA, DATED DECEMBER 17 2021. SEE GEOTECHNICAL REPORT FOR MORE INFORMATION.
7. THERE ARE NO CCSYA'S ON-SITE.

DMA/BMP TABLE

DMA#	DMA TYPE	BMP#	POC	BMP TYPE	DMA TRIBUTARY DRAINAGE AREA (AC)	BMP BOTTOM AREA (SQFT)
1	DRAINS TO BMP 1	1	DRAINS TO POC 2	BIOFILTRATION (BF-1) LINED BIOFILTRATION	2.17	3120
2A	DRAINS TO BMP 2	2	DRAINS TO POC 2	PROPRIETARY BIOFILTRATION SYSTEMS (BF-3) MWS-L-8-20	1.93	N/A
2B	DRAINS TO BMP 2	2	DRAINS TO POC 2	PROPRIETARY BIOFILTRATION SYSTEMS (BF-3) MWS-L-8-20	0.17	N/A
2C	DRAINS TO BMP 2	2	DRAINS TO POC 2	PROPRIETARY BIOFILTRATION SYSTEMS (BF-3) MWS-L-8-20	0.32	N/A
3	DRAINS TO BMP 3	3	DRAINS TO POC 1A	PROPRIETARY BIOFILTRATION SYSTEMS (BF-3) MWS-L-8-24	3.31	N/A
4	DRAINS TO BMP 4	4	DRAINS TO POC 1A	PROPRIETARY BIOFILTRATION SYSTEMS (BF-3) MWS-L-8-20	2.01	N/A
5	DRAINS TO BMP 5	5	DRAINS TO POC 1A	PROPRIETARY BIOFILTRATION SYSTEMS (BF-3) MWS-L-8-8	1.03	N/A
6	DRAINS TO BMP 6	6	DRAINS TO POC 2	PROPRIETARY BIOFILTRATION SYSTEMS (BF-3) MWS-L-8-8	0.97	N/A
7	DRAINS TO BMP 7	7	DRAINS TO POC 2	PROPRIETARY BIOFILTRATION SYSTEMS (BF-3) MWS-L-8-12	1.36	N/A
8	DRAINS TO BMP 8	8	DRAINS TO POC 2	PROPRIETARY BIOFILTRATION SYSTEMS (BF-3) MWS-L-8-16	2.54	N/A
9	DRAINS TO BMP 9	9	DRAINS TO POC 2	PROPRIETARY BIOFILTRATION SYSTEMS (BF-3) MWS-L-8-12	2.33	N/A
10	DRAINS TO BMP 10	10	DRAINS TO POC 1A	PROPRIETARY BIOFILTRATION SYSTEMS (BF-3) MWS-L-8-16	2.83	N/A
11	DRAINS TO BMP 11	11	DRAINS TO POC 1A	PROPRIETARY BIOFILTRATION SYSTEMS (BF-3) MWS-L-8-8	1.32	N/A
12	DRAINS TO BMP 12	12	DRAINS TO POC 1A	PROPRIETARY BIOFILTRATION SYSTEMS (BF-3) MWS-L-8-20	1.85	N/A
13	DRAINS TO BMP 13	13	DRAINS TO POC 1A	PROPRIETARY BIOFILTRATION SYSTEMS (BF-3) MWS-L-8-8	1.58	N/A
14	DRAINS TO BMP 14	14	DRAINS TO POC 1A	PROPRIETARY BIOFILTRATION SYSTEMS (BF-3) MWS-L-8-16	0.58	N/A
15	SELF-MITIGATING	N/A	DRAINS TO POC 1A	N/A	3.24	N/A
16	SELF-MITIGATING	N/A	DRAINS TO POC 1B	N/A	4.27	N/A
17	SELF-MITIGATING	N/A	DRAINS TO POC 2	N/A	0.12	N/A
18	SELF-MITIGATING	N/A	DRAINS TO POC 2	N/A	0.07	N/A
19	SELF-MITIGATING	N/A	DRAINS TO POC 2	N/A	0.02	N/A
20	DE-MINIMUS	N/A	DRAINS TO POC 2	N/A	0.004	N/A
21	DE-MINIMUS	N/A	DRAINS TO POC 2	N/A	0.004	N/A
22	TREATMENT SWAP	N/A	DRAINS TO POC 2	N/A	0.07	N/A
23	TREATMENT SWAP	N/A	DRAINS TO POC 2	N/A	0.06	N/A
SUM					34.15	3120

SOURCE: Appendix I-2

FIGURE 5.9-3

Proposed Drainage Conditions

Rohr Wohl Specific Plan

DUDEK

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5.10 Land Use and Planning

This section of the environmental impact report (EIR) describes the existing land use and planning conditions of the project site and vicinity, identifies associated regulatory requirements, and evaluates potential impacts related to implementation of the proposed Rohr Wohl Specific Plan Project (project or proposed project).

5.10.1 Existing Conditions

5.10.1.1 Regulatory Framework

State

California Planning and Zoning Law

The legal framework under which California cities and counties exercise local planning and land use functions is set forth in California Planning and Zoning Law, Government Code Sections 65000–66499.58. Under state planning law, each city and county must adopt a comprehensive, long-term general plan. State law gives cities and counties wide latitude in how a jurisdiction may create a general plan, but there are fundamental requirements that must be met. These requirements include the provision of seven mandatory elements described in the Government Code, including a land use element. Each of the elements must contain text and descriptions setting forth objectives, principles, standards, policies, and plan proposals; diagrams and maps that incorporate data and analysis; and mitigation measures.

California Government Code, Section 65450 et seq.

California Government Code (Sections 65450–65457) governs the content and consistency of specific plans with the adopted general plan of the jurisdiction within which they are located. Specific plans shall include text and a diagram(s) that include the following in detail: (1) the distribution, location, and extent of the uses of land, including open space, within the area covered by the plan; (2) the proposed distribution, location, and extent and intensity of major components of public and private transportation, sewage, water, drainage, solid waste disposal, energy, and other essential facilities proposed to be located within the area covered by the plan and needed to support the land uses described in the plan; (3) standards and criteria by which development will proceed and standards for the conservation, development, and utilization of natural resources, where applicable; and (4) a program of implementation measures including regulations, programs, public works projects, and financing measures necessary to carry out the above-mentioned details. In addition, a specific plan shall include a statement of the relationship of the specific plan to the general plan.

Regional

San Diego Association of Governments – San Diego Forward: The Regional Plan

The San Diego Association of Governments (SANDAG) adopted the 2021 Regional Plan in December 2021 (SANDAG 2021a). The 2021 Regional Plan combines the region's two most important existing planning documents: the Regional Comprehensive Plan and the 2050 Regional Transportation Plan (RTP) and its Sustainable Communities Strategy (SCS) (2050 RTP/SCS). The Regional Comprehensive Plan, adopted in 2004, laid out key principles for managing the region's growth while preserving natural resources and limiting urban sprawl. The plan covers policy areas including urban form, transportation, housing, healthy environment, economic prosperity, public facilities, our

borders, and social equity. These policy areas were addressed in the 2050 RTP/SCS and are now fully integrated into the 2021 Regional Plan (SANDAG 2021a). The goal of the SCS is to establish a development plan for the region, which, after considering transportation measures and policies, will achieve, if feasible, the greenhouse gas reduction targets. The greenhouse gas reduction target to be achieved through the adoption of SANDAG's SCS is a 20% reduction in emissions per capita by 2035. The 2021 Regional Plan serves as the blueprint for how the San Diego region will grow and how SANDAG will invest in transportation infrastructure to provide more choices, strengthen the economy, promote a healthy environment, and support thriving communities. The 2021 Regional Plan sets forth the following six general objectives: habitat and open space preservation, regional economic prosperity, environmental stewardship, providing mobility choices, partnerships/collaboration with neighboring entities, and creating healthy and complete communities (SANDAG 2021a).

At the core of the 2021 Regional Plan is an SCS that charts a course toward lowering greenhouse gas emissions and includes the following five building blocks (SANDAG 2021a):

- A land use pattern that accommodates our region's future employment and housing needs, and protects sensitive habitats, cultural resources, and resource areas.
- A transportation network of public transit, managed lanes and highways, local streets, bikeways, and walkways built and maintained with reasonably expected funding.
- Managing demands on our transportation system (also known as Transportation Demand Management, or TDM) in ways that reduce or eliminate traffic congestion during peak periods of demand.
- Managing our transportation system (also known as Transportation System Management, or TSM) through measures that maximize the overall efficiency of the transportation network.
- Innovative pricing policies and other measures designed to reduce the number of miles people travel in their vehicles, as well as traffic congestion during peak periods of demand.

The 2021 Regional Plan includes the following set of principles that will guide the development of the region's future transportation network (SANDAG 2021a):

- The SANDAG investment plan will be built with financial resources that are reasonably expected to be available between now and 2050.
- A more efficient transportation network will be achieved through two key strategies: effectively managing the overall system (TSM) and effectively managing demands on the system (TDM) with innovative technologies integrated into both. The result will be maximized efficiency in the transportation network, which ultimately can lower greenhouse gas emissions.
- Managing parts of the network, such as adding managed lanes and transit only lanes on freeways, which encourage people to carpool and use public transit to bypass bottlenecks.
- The road toward a more sustainable San Diego region should include vehicles that use cleaner, alternative sources of energy with SANDAG playing an important role in promoting this transition.

SANDAG also prepared a 2019 Federal Regional Transportation Plan (2019 Federal RTP), which was adopted December 2021. The 2019 Federal RTP builds on the 2015 Regional Plan with updated project costs and revenues and a new regional growth forecast. The 2019 Federal RTP is consistent with the Final EIR approved in conjunction with the 2021 Regional Plan on December 10, 2021.

San Diego Air Pollution Control District

The State of California has 35 specific air districts, which are each responsible for ensuring that the criteria pollutants are below the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS). Air basins that exceed either the NAAQS or the CAAQS for any criteria pollutants are designated as "nonattainment areas" for that pollutant. Currently, there are 15 nonattainment areas for the federal ozone (O_3) standard and two nonattainment areas for the fine particulate matter ($PM_{2.5}$) standard; many areas are in nonattainment for coarse particulate matter (PM_{10}) as well. Therefore, California created the California State Implementation Plan (SIP), which is designed to provide control measures needed to attain the NAAQS and CAAQS.

San Diego Air Pollution Control District (SDAPCD) and the San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the SDAB. The RAQS for the SDAB was initially adopted in 1991 and is updated every 3 years. The RAQS outlines SDAPCD's plans and control measures designed to attain the CAAQS for O_3. The RAQS relies on information from CARB and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in the County and the cities in the County, to forecast future emissions and then determine from that the strategies necessary for the reduction of emissions through regulatory controls. The CARB mobile source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by the County and the cities in the County as part of the development of their general plans (SANDAG 2021).

On March 9, 2023, SDAPCD adopted the 2022 Regional Air Quality Strategy (RAQS). The RAQS plan demonstrates how the San Diego region will further reduce air pollution emissions to meet state health-based standards for ground-level O_3. The 2022 RAQS guides the SDAPCD in deploying tools, strategies, and resources to continue reducing pollutants that are precursors to ground-level O_3, including oxides of nitrogen (NO_x) and volatile organic compounds (VOCs). The 2022 RAQS emphasizes O_3 control measures but also identifies complementary measures and strategies that can reduce emissions of Greenhouse Gases (GHGs) and PM. It also includes new analyses exploring O_3 and its relationship to public health, mobile sources, under-resourced communities, and GHGs and climate change (SANDAG 2023). Further, the 2022 RAQS identifies strategies to expand SDAPCD regional partnerships, identify more opportunities to engage the public and communities of concern, and integrate environmental justice and equity across all proposed measures and strategies.

Regarding particulate matter emissions reduction efforts, in December 2005, SDAPCD prepared a report titled "Measures to Reduce Particulate Matter in San Diego County" to address implementation of Senate Bill (SB) 656 in San Diego County (SB 656 required additional controls to reduce ambient concentrations of PM_{10} and $PM_{2.5}$) (SDAPCD 2005). In the report, SDAPCD evaluated the implementation of source-control measures that would reduce particulate matter emissions associated with residential wood combustion; various construction activities including earthmoving, demolition, and grading; bulk material storage and handling; carryout and trackout removal and cleanup methods; inactive disturbed land; disturbed open areas; unpaved parking lots/staging areas; unpaved roads; and windblown dust (SDAPCD 2005).

Local

City of Chula Vista General Plan

The City of Chula Vista General Plan was updated by the City on December 13, 2005, and most recently amended in 2020. The General Plan provides a long-term strategy to address planning issues for the growth and development of the City and is composed of the following six elements: land use and transportation, economic development,

public facilities and services, environmental, and housing (City of Chula Vista 2005). The project site is located in the Bayfront Planning Area and Harbor District subarea of the General Plan (City of Chula Vista 2005).

Land Use and Transportation Element

The Land Use and Transportation Element establishes the land use categories, roadway classifications, and generalized land use patterns for City development and focuses on themes that (1) support strong community character and image, (2) support strong and safe neighborhoods, and (3) improve mobility. This element establishes plans and policies to identify the general distribution of housing, businesses, industry, open space (including parks), education facilities, and public buildings. Standards for population density and building intensity in each land use classification are also provided (City of Chula Vista 2005).

Economic Development Element

The Economic Development Element establishes policies to ensure the long-term vitality of the local economy and to help develop, guide, and encourage appropriate employment and business ownership in the City. It promotes a sustainable local economy to benefit present and future generations without detrimentally affecting resources. Employment land, or land designated for commercial, industrial and other non-residential, or open space use, is concentrated in three principal areas: the tideland area, the Montgomery area, and the Otay Ranch area (City of Chula Vista 2005).

Public Facilities and Services Element

The Public Facilities and Services Element establishes the plan to provide and maintain infrastructure and public services for future growth, without diminishing services to existing development within the City. The overall goal of this element is to provide and maintain public facilities and services within the City through abundant public infrastructure and community services that support and enhance the well-being of the City and its residents (City of Chula Vista 2005).

Environmental Element

The Environmental Element establishes the policy framework for improving sustainability through the City's stewardship of natural and cultural resources, promotion of environmental health, and protection of persons and property from environmental hazards and noise. Sustainable development is identified as a means of balancing current growth and economic progress with protection of future resources (City of Chula Vista 2005).

City of Chula Vista Multiple Species Conservation Program Subarea Plan

The City of Chula Vista Multiple Species Conservation Program (MSCP) Subarea Plan has been prepared as an implementing plan of the MSCP Subregional Plan and is the basis for federal and state incidental take permits for 86 plant and animal species within the City's jurisdiction. The MSCP Subarea Plan was approved by the City of Chula Vista (City) in May 2003 and the City received take authorization in January 2005. The Subarea Plan provides for conservation of upland habitats and species through Preserve design, regulation of impacts and uses, and management of the preserve. The MSCP Subregional Plan, dated August 1998, was prepared for 12 local San Diego jurisdictions, including the City of Chula Vista, and is to be implemented through MSCP Subarea Plans. The MSCP Subarea Plan is implemented through individual Subarea Plans adopted by each jurisdiction receiving Take authorization for covered species. Subarea Plans approved under the Natural Community Conservation Planning

Act would allow "take" of various sensitive species through specific conditions of coverage pursuant to Section 4(d) of the federal ESA. The City has an adopted MSCP Subarea Plan (City of Chula Vista 2003) and the Habitat Loss and Incidental Take (HLIT) Ordinance (City of Chula Vista 2019) regulates the implementation of the Subarea Plan.

The City MSCP Subarea Plan states that of the 86 covered species, 19 sensitive plant and wildlife species are considered adequately protected within the Preserve lands, and the City has obtained Incidental Take Authorization for the remaining 67 plant and wildlife species within the City of Chula Vista. Sensitive plants, animals, and habitats are defined in the MSCP Subarea Plan as rare, endangered, depleted, or declining according to the U.S. Fish and Wildlife Service, California Department of Fish and Wildlife, California Native Plant Society, and/or the City.

MSCP Preserved Lands

The MSCP Conservation Plan identifies specific areas as preserved lands. These lands are set aside for habitat conservation and the preservation of vegetation and wildlife communities within San Diego County. The City and multiple wildlife agencies have a legal agreement to protect and monitor the approximately 80,000 acres of preserved lands. The proposed project site and study area are within the Chula Vista MSCP Planning Area, but not within or adjacent to designated preserved lands under the City MSCP Subarea Plan.

MSCP Non-Covered Projects

Development projects within Development Areas outside of covered projects are regulated by the HLIT ordinance. The HLIT ordinance establishes mitigation standards for biological resources and implements the City's MSCP Subarea Plan for development projects outside the Covered Projects category, as identified in the City's MSCP Subarea Plan. Provisions for protection of Narrow Endemic Species apply to all areas regulated by the HLIT ordinance. The HLIT ordinance calls for impacts to wetlands to be avoided and minimized to the maximum extent practicable and requires mitigation for all permanent impacts to wetlands and natural vegetation at ratios provided in the MSCP Subarea Plan.

Narrow Endemic Species Protection

Narrow Endemic Species have a very restricted habitat that can only occur only in the San Diego County region. Specific protections apply to Narrow Endemic Species pursuant to the City MSCP Subarea Plan. The following specific provisions are applicable to the project site.

Development Areas. Impacts to Narrow Endemic Species from development outside of Covered Projects will be avoided to the maximum extent practicable. Where impacts are demonstrated to be unavoidable, impacts within these Development Areas will be limited to 20% of the total Narrow Endemic Species population within the project site. Findings of equivalency, as defined in Section 5.2.3.6 of the Subarea Plan (City of Chula Vista 2003), will be made by the City for such Take Authorization of the covered Narrow Endemic Species.

City of Chula Vista Municipal Code

Zoning Ordinance

Title 19 of the City of Chula Vista Municipal Code (CVMC) is the City's Zoning Code, which is intended to implement the General Plan. The project site is designated as a General Industrial Zone (I). As defined in Chapter 19.46 of the CVMC, the purposes of the I-G zone are to encourage sound industrial development by providing and protecting an environment exclusively for such development, subject to regulations necessary to ensure the purity of the airs and

waters in Chula Vista and San Diego County, and to protect nearby residential, commercial and industrial uses of the land from hazards and noise or other disturbances. Permitted uses (City of Chula Vista 2001) are as follows:

- Any manufacturing, processing, assembling, research, wholesale, or storage uses except as hereinafter modified;
- Automobile and metal appliance manufacturing and assembly, structural steel fabricating shops and machine shops;
- Brick or pottery manufacturing and stone or monument works;
- Trucking yards, terminals, and distributing operations;
- Liquefied natural gas plants;
- Temporary tract signs, subject to the provisions of CVMC 19.58.320 and 19.60.600(E)(2);
- Any other use which is determined by the Commission to be of the same general character as the above uses.

Chula Vista Bayfront Specific Plan

Chapter 19.81 of the CVMC defines the scope and purpose of the Bayfront Specific Plan. This chapter of the CVMC is intended to implement the Chula Vista General Plan and the Chula Vista Local Coastal Program (LCP) Land Use Plan (LUP) and their goals, objectives, and policies. Chapter 19.84 of the CVMC provides for the classification of land use and the regulation of development by land use and zoning parcel. The project is zoned as Industrial in the Bayfront Specific Plan. Chapter 19.85 of the CVMC outlines the development criteria for the Bayfront Specific Plan.

Chula Vista Bayfront Local Coastal Program Land Use Plan

The Chula Vista Bayfront LCP Amendment Bayfront Specific Plan was adopted in 2012 and amended in 2017. It governs the development of 722 acres of the City's bayfront. The LCP provides a detailed plan for the orderly growth, development, redevelopment, and conservation of the City jurisdictional parcels located within the Chula Vista Bayfront coastal area. Each coastal city and county's LCP is required to be pursuant to the California Coastal Act and approved by the California Coastal Commission. This LCP is consistent with the City General Plan and represents a step toward systematic implementation of the General Plan in the bayfront. The LUP provides land use and development policies to ensure that development within the bayfront will be consistent with the provisions of the California Coastal Act. The project site is within the Harbor District subarea, described in the LCP. The LUP outlines objectives and policies as the standard review for coastal development permits (City of Chula Vista 2012).

5.10.1.2 Existing Conditions on Project Site

The project site consists of approximately 44.8 acres located in the City of Chula Vista, California. The site is in the northwest portion of the City of Chula Vista, directly adjacent to the City of San Diego. More specifically, the project site is located west of Interstate (I) 5, north of H Street, south of G Street, east of Marina Parkway, and 0.5 miles east of San Diego Bay.

Planning Area A is currently developed with an approximately 282,004-square-foot building. Known as Building 29 (795 H Street), the building was used for research and development, tooling, and warehousing and distribution of aftermarket products until February 2021. The buildings in Planning Areas B-1 and B-2 included 2 large buildings totaling 733,977 square feet and 11 outbuildings totaling 32,860 square feet, for a total building square footage of approximately 766,837. The buildings were used for manufacturing, warehouse, and distribution operations, which ceased in approximately 2020. On-site structures in Planning Areas B-1 and B-2 have been demolished, All building debris has been hauled off-site to appropriate disposal facilities, and Raytheon Technologies Corporation, of which Rohr is a wholly

owned company, is completing soil and groundwater remediation in accordance with San Diego Regional Water Quality Control Board (RWQCB) CAO R9-2021-0042, which was issued to Rohr in July 2021.The existing building in Planning Area A remains and will not be demolished as part of the CAO or the proposed project.

A 40-foot-wide San Diego Gas and Electric Company (SDG&E) right-of-way with an abandoned rail line and a 150-foot-wide SDG&E easement runs north–south through the project site. An SDG&E substation is also located on the north end of the project site.

5.10.1.3 Surrounding Land Uses

Land uses surrounding the project site include vacant properties, Collins Aerospace, and Seven Mile Casino to the north; Marina, Chula Vista Harbor, and future development as part of the Chula Vista Bayfront Master Plan to the south; Bay Boulevard and I-5 to the east; and Chula Vista RV Resort and future development site for the Gaylord Pacific Resort Hotel and Convention Center to the west.

5.10.2 Thresholds of Significance

The significance criteria used to evaluate the project impacts to land use and planning are based on Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.). According to Appendix G, a significant impact related to land use and planning would occur if the project would:

1. Physically divide an established community.
2. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

5.10.3 Impacts

Would the project physically divide an established community?

The physical division of an established community typically refers to the construction of a linear feature, such as an interstate highway or railroad tracks, or removal of a means of access, such as a local road that would impact mobility within an existing community or between a community and outlying area. The project does not include the construction of a highway or railroad tracks, or the removal of a means of access that would impact mobility within an existing community or between communities.

The proposed project site is currently developed with two main industrial buildings and several smaller outbuildings. The existing buildings were used for manufacturing, warehouse, and distribution operations, which ceased in approximately 2020. Land uses surrounding the project site include vacant properties, Collins Aerospace, and Seven Mile Casino to the north; Marina, Chula Vista Harbor, and future development as part of the Chula Vista Bayfront Master Plan to the south; Bay Boulevard and I-5 to the east; and Chula Vista RV Resort and future development site for the Gaylord Pacific Resort Hotel and Convention Center to the west. The project site is bounded to the north by G Street, to the east by Bay Boulevard, and to the south by H Street. All these streets currently provide direct access to the project site. The project does not propose components that would impede or present barriers to existing circulation networks. Additionally, a pedestrian and bicycle path extension of the Bayshore Bikeway would cross through the project site between Planning Area A and Planning Areas B-1 and B-2. This extension of the Bayshore Bikeway would be a new multi-use path that would run along a portion of the San Diego

Gas and Electric Company (SDG&E) and Rail easement from G Street to H Street. The project site was previously developed with industrial uses and would be further developed with uses consistent with existing and surrounding uses. Implementation of the proposed project would not physically divide an established community. Therefore, impacts would be **less than significant**.

Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

The proposed project would include multiple discretionary actions and/or approvals, as discussed in Section 4.4.1, Approvals and Amendments, of this EIR. These would include amendments to the Chula Vista General Plan, Chula Vista LCP, Bayfront Specific Plan, and the Chula Vista Municipal Code Chapter 19. These amendments would be processed concurrently with Specific Plan adoption and would result in consistency between the proposed project and applicable provisions of the Chula Vista General Plan, Chula Vista LCP, the Bayfront Specific Plan, and the Chula Vista Municipal Code Chapter 19.

In accordance with California Government Code (Title 7, Division 1, Chapter 3, Article 8, Sections 65450 through 65457), cities are authorized to adopt Specific Plans to implement their General Plan. The City of Chula Vista will adopt the proposed Specific Plan by ordinance, requiring public hearings by both the Planning Commission and City Council. The Specific Plan is a regulatory plan constituting the development concept and zoning for the subject properties. Site Development Plans, tract or parcel maps, development agreements, local public works projects, zoning ordinances (Government Code Sections 65455, 65867.5[b]), and any action requiring ministerial or discretionary approval related to the project must be consistent with the final adopted Specific Plan.

Chula Vista General Plan

The proposed project would amend the General Plan to change the land use designation on the project site from Industrial (I) to Rohr Wohl Specific Plan; allowed uses on site would be governed by the Specific Plan. The Specific Plan would allow for permitted, conditionally permitted, and prohibited uses within six land use categories: Commercial Retail (CR), Commercial Visitor (CV), Commercial Office (CO), Light Industrial (LI), Regional Technology Park (RTP), and Business Park Flex (BPF). The purpose of the Specific Plan is to permit and regulate the orderly development of the Specific Plan area in furtherance of the City's General Plan, as it may be amended for implementation of the Specific Plan.

The General Plan is the primary source of long-range planning and policy direction that is used to guide development within the City and serves as a policy guide for determining the appropriate physical development and character of Chula Vista. While specific plans are not required to rigidly conform to the City's General Plan, they must demonstrate consistency with the goals and policies set forth in the General Plan to demonstrate that the specific plan and General Plan are in general harmony. The Specific Plan has been prepared in conformance with the goals and policies of the City of Chula Vista General Plan as amended, in providing a commercial/light Industrial use on an underutilized property, creating new employment opportunities, and providing regulations that support the success of an employment area of the City. Table 5.10-1, General Plan Consistency Table, identifies all the goals and policies applicable to the proposed project and describes the project's consistency, or inconsistency.

As discussed above and in Table 5.10-1 below, the proposed project would not conflict with any goals or policies of the General Plan. Thus, the proposed project would be consistent with the General Plan.

Chula Vista Bayfront Local Coastal Program/Land Use Plan and Bayfront Specific Plan

The Chula Vista Bayfront LUP is implemented by the Bayfront Specific Plan. The proposed project would remove the project site from the LUP and the Bayfront Specific Plan, which would require an amendment to the plans. However, the properties surrounding the project site would still be required to demonstrate general conformance to the LUP and the Bayfront Specific Plan. The land uses proposed under the Rohr Wohl Specific Plan are intended as a departure from heavy industrial uses to light industrial uses, business park, and visitor-serving uses, which are more compatible with and complement other uses planned in the Bayfront Specific Plan.

The proposed Rohr Wohl Specific Plan generally conforms to the objectives and policies of the Bayfront Local Coastal Program LUP by encouraging a mix of uses in the bayfront and allowing for continued industrial use in areas already designated for those uses. Although the project site is near the Bay, it is separated from the Bay by major development, including the new Gaylord Hotel, and contains no special coastal resources such as a beach, wetlands, or inlet. Table 5.10-2 identifies policies and objectives applicable to the proposed project and describes the project's consistency, or inconsistency, with these.

As discussed above and in Table 5.10-2 below, the proposed project would not conflict with the Local Coastal Program LUP. Therefore, the proposed project would be consistent with the Local Coastal Program.

City of Chula Vista Zoning Code

To comply with state law and bring zoning of the project site into conformance with the General Plan, the Specific Plan proposes new zoning, which would amend the existing zoning designation to three new zoning designations: PA-1 (for Planning Area A), PA-2 (for Planning Area B-1), and PA-3 (for Planning Area B-2). The new zoning provides provisions for land uses, building intensity, form, mass, height, and design within the Specific Plan area. The proposed zoning and development regulations identified in the Specific Plan would replace the provisions of the CVMC Sections 19.81, 19.84, and 19.85.

Upon adoption of the proposed zoning and development standards, the proposed project would replace existing zoning designations on the project site. The new zoning and development standards would provide for orderly development of each planning area and assist in providing new opportunities for investment and revitalization along the bayfront. Application of proposed zoning regulations is specifically intended to provide for and ensure the most appropriate use of the project site, to create a harmonious relationship among land uses, and to protect the health, safety, and welfare of the community. Accordingly, the new zoning and development standards would not conflict with the overall intent and purpose of the CVMC.

City of Chula Vista Multiple Species Conservation Program Subarea Plan

The City of Chula Vista Multiple Species Conservation Program (MSCP) Subarea Plan is a local policy document that provides for conservation of upland habitats and species through preserve design, regulation of impacts and uses, and management of the preserve (City of Chula Vista 2003). The project site lies within the boundaries of the City's MSCP Subarea Plan, within Development Areas outside of covered projects and outside of the preserve area. However, a preserve area does occur approximately 500 feet north of the project site. The project would not result in impacts to any wildlife corridors or linkages, including lands identified within the City's MSCP Subarea Plan as Significant Biological Linkages or other areas of local or regional wildlife movement importance. Nonetheless, all new developments must adhere to specific guidelines under MSCP Adjacency Management Issues. Following is an

analysis of the project's compliance with each of the MSCP Adjacency Management Issues (identified in Section 5.3, Biological Resources, 5.3.1.1 Regulatory Framework):

Drainage. Construction activities would be required to implement best management practices (BMPs) including, but not limited to, the use of silt fencing or fiber rolls around active work areas. Once operational, a storm drainage system (curbs, gutters, inlets etc.) would convey water through the site to detention basins that would allow for control, treatment, and filtration. BMPs would be integrated into the project design to ensure water quality impacts to downstream drainages would be avoided.

Toxic Substances. The project does not propose the use or release of toxic substances that could harm biological resources. Further, the project would implement BMPs to ensure no toxic substances are discharged from the project site. All methods used would be consistent with requirements of the Regional Water Quality Control Board and National Pollutant Discharge Elimination System standards.

Lighting. Construction activities would be performed during daylight hours to avoid the need for light shielding. Should nighttime lighting be required on site, the project would implement BMPs to protect preserve lands and sensitive species from night lighting. All lighting for operation of the project would provide adequate shielding as necessary.

Noise. The project site is not occupied by the coastal California gnatcatcher (*Polioptila californica*) or the least Bell's vireo (*Vireo bellii pusillus*). Raptors, such as osprey (*Pandion haliaetus*), are known to use the project site and the potential for other nesting raptors is moderate, due to the presence of ornamental trees and manmade structures suitable for nesting. If demolition or ground-disturbing activities are initiated during the raptor breeding season (generally January 15–July 31), a survey will be required to identify any potential noise impacts on nesting raptors. If necessary, noise reduction techniques will be implemented.

Invasives. Per the project's landscape plans, no invasive plant species would be used during ornamental landscaping associated with the project. Invasive species are those determined by the City of Chula Vista and identified in the MSCP Subarea Plan, Appendix N, List of Invasive Species.

Buffers. The project would not occur within or immediately adjacent to any reserve lands. As such, no buffers are proposed.

Moreover, all impacts to biological resources would be mitigated to a less-than-significant level. As such, no conflicts with the City's MSCP Subarea Plan would occur.

Conclusion

As demonstrated throughout the analysis for Threshold 2, the proposed project would not result in a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be **less than significant**.

5.10.4 Level of Significance prior to Mitigation

Impacts to land use and planning would be **less than significant**.

5.10.5 Mitigation Measures

No mitigation measures are required.

5.10.6 Level of Significance after Mitigation

No mitigation measures would be required. Impacts to land use and planning would be **less than significant**.

Table 5.10-1. General Plan Consistency Table

Objective	Policy	Text	Consistent?	Consistency Analysis
Economic Development				
ED 1	ED 1.3	Encourage the preservation and expansion of existing industrial uses in areas designated as industrial.	yes	The project preserves and enhances existing industrial use in an area designated as industrial.
ED 1	ED 1.4	Increase the supply of land for non-retail employment through the designation of land to accommodate a regional technology park; a future business park; industrial or business park space; and development of a university campus.	yes	The project would expand opportunities for non-retail employment through the designation of land to accommodate a regional technology park; a future business park; industrial or business park space.
ED 1	ED 1.6	Promote economic development that fosters job availability, economic revitalization, and tax revenues.	yes	The project would promote economic development that fosters job availability, economic revitalization, and tax revenues.
ED 2	ED 2.2	Facilitate increased employment densities near transit stations and routes.	yes	The project increases employment densities near transit stations and routes.
ED 2	ED 2.7.	Support businesses that provide healthy living options in proximity to residential development.	yes	The Project expands opportunities for employment options in proximity to residential development.
ED 3	ED 3.5	Provide for ancillary commercial development in business parks, such as banks and restaurants, in order to provide amenities for future tenants.	yes	The Project includes a range of commercial uses that provide amenities for future business tenants.
ED 4	ED 4.3	Incorporate a high quality office park in the Bayfront that can accommodate research and technology businesses.	yes	The project land uses support the development of research, technology, and high-tech manufacturing in the land uses allowed and the building design to allow flexibility and adaptability for a mix of near term, mid-term, and long-term tenants.
ED 5	ED 5.5	Support development of Chula Vista as an export city, capitalizing on the City's bayfront location and on its proximity to the international border to create a niche for export businesses and industries.	yes	The Project capitalizes on the City's bayfront location and on its proximity to the international border to create a niche for export businesses and industries.
ED 6	ED 6.3	Through subsequent planning programs, develop and promote various portions of the City, including the Chula Vista Bayfront; the Third Avenue District; Eastlake; and the area	yes	The Project proposes land uses that include Visitor-Serving Commercial, Hotel, and Retail uses that contribute to making the Bayfront a destination.

Table 5.10-1. General Plan Consistency Table

Objective	Policy	Text	Consistent?	Consistency Analysis
		surrounding Otay Lakes as regional visitor destinations that could include hotels, meeting spaces, and conference facilities.		
ED 7	ED 7.1	Improve traffic flow and transportation linkages between the downtown, Bayfront, southwestern, and eastern areas of the City. Add additional travel lanes where warranted, revise signal timing to improve traffic flow, and consider additional freeway crossovers, where necessary.	yes	The Proposed Project would result in the development of planned circulation element roadways that would help provide for easier access and connectivity of the downtown to the Bayfront area. The project would involve transportation planning mitigation measures such as addition of lanes and signals to existing roadway facilities.
ED 8	ED 7.2	Link activity centers through strong public transportation and combined land uses that encourage multipurpose trips.	yes	The project proposes a mixture of industrial, commercial/retail, office, and tourist commercial uses interconnected by private drives, paseos, and walkways. It is conceivable that an individual could live, work, recreate, and participate in cultural/civic activities within the Bayfront area so as to promote multipurpose trips or eliminate trips all together.
ED 9	ED 7.3	Improve existing districts and uses in western Chula Vista that will attract residents citywide.	yes	The Proposed Project would result in improvements to the Bayfront, located in western Chula Vista and provide employment opportunities for residents citywide. Visitors to the Bayfront are anticipated to come from all over the City and surrounding County.
ED 10	ED 10.1	Provide sufficient telecommunication, water, sewer, and other infrastructure capacity to support new business development, including technology and science based industries, while continuing to support the existing business base.	yes	The Proposed Project would result in enhanced infrastructure facilities to allow for build-out of the Specific Plan. The connection between the Bayfront area and the Chula Vista Urban Core would be strengthened by possible future transit support services such as vanpools and connection by non-roadway corridors, which would also provide for enhanced public open space and recreation opportunities for the entire south county area.
ED 10	ED 10.3	Identify ways to obtain timely funding for public facility and service needs.	yes	It is the City's policy to use public funds such as property taxes, sales taxes, and fees generated by the proposed project to cover the incremental costs associated with providing fire and police services. The project would not

Table 5.10-1. General Plan Consistency Table

Objective	Policy	Text	Consistent?	Consistency Analysis
				substantially increase the demand for fire or police protection services requiring the construction of new or expanded facilities or facilitate the need for additional personnel or equipment.
Environmental Element				
E1	E 1.1	Implement the City of Chula Vista MSCP Subarea Plan		The project site lies within the boundaries of the City's MSCP Subarea Plan, within Development Areas outside of covered projects and outside of the preserve area. However, a preserve area does occur approximately 500 feet north of the project site. The project would not result in impacts to any wildlife corridors or linkages, including lands identified within the City's MSCP Subarea Plan as Significant Biological Linkages or other areas of local or regional wildlife movement importance. Nonetheless, all new developments must adhere to specific guidelines under MSCP Adjacency Management Issues. Following is an analysis of the project's compliance with each of the MSCP Adjacency Management Issues (identified in Section 5.3, Biological Resources, 5.3.1.1 Regulatory Framework): **Drainage.** Construction activities would be required to implement best management practices (BMPs) including, but not limited to, the use of silt fencing or fiber rolls around active work areas. Once operational, a storm drainage system (curbs, gutters, inlets etc.) would convey water through the site to detention basins that would allow for control, treatment, and filtration. BMPs would be integrated into the project design to ensure water quality impacts to downstream drainages would be avoided. **Toxic Substances.** The project does not propose the use or release of toxic substances that could harm biological resources. Further, the project would implement BMPs to ensure no toxic substances are discharged from the

Table 5.10-1. General Plan Consistency Table

Objective	Policy	Text	Consistent?	Consistency Analysis
				project site. All methods used would be consistent with requirements of the Regional Water Quality Control Board and National Pollutant Discharge Elimination System standards. **Lighting.** Construction activities would be performed during daylight hours to avoid the need for light shielding. Should nighttime lighting be required on site, the project would implement BMPs to protect preserve lands and sensitive species from night lighting. All lighting for operation of the project would provide adequate shielding, as necessary. **Noise.** The project site is not occupied by the coastal California gnatcatcher (*Polioptila californica*) or the least Bell's vireo (*Vireo bellii pusillus*). Raptors, such as osprey (*Pandion haliaetus*), are known to use the project site and the potential for other nesting raptors is moderate, due to the presence of ornamental trees and manmade structures suitable for nesting. If demolition or ground-disturbing activities are initiated during the raptor breeding season (generally January 15–July 31), a survey will be required to identify any potential noise impacts on nesting raptors. If necessary, noise reduction techniques will be implemented. **Invasives.** Per the project's landscape plans, no invasive plant species would be used during ornamental landscaping associated with the project. Invasive species are those determined by the City of Chula Vista and identified in the MSCP Subarea Plan, Appendix N, List of Invasive Species. **Buffers.** The project would not occur within or immediately adjacent to any reserve lands. As such, no buffers are proposed.

Table 5.10-1. General Plan Consistency Table

Objective	Policy	Text	Consistent?	Consistency Analysis
E 2	E 2.2	Pursue safe alternatives to traditional pest management methods in order to reduce toxics in urban runoff and large open uses of land (e.g., golf courses, parks, and agricultural lands).	yes	All landscape areas within the Proposed Project would be subject to the City's Design Review process in addition to review by a variety of City departments including stormwater management, environmental safety, parks and recreation, planning, and public works. Final specifications on landscaped areas in the project area, including application of pest control measures, would be coordinated with the appropriate department and ultimate management entity. This process would ensure that maintenance of such areas is consistent with this policy.
E 2	E 2.4	Ensure compliance with current federal and state water quality regulations, including the implementation of applicable NPDES requirements and the City's Pollution Prevention Policy.	yes	The Proposed Project has been thoroughly reviewed to ensure consistency with City Stormwater, Pollution Prevention, and NPDES policies aimed at protecting water quality (see *Section 4.9*, *Hydrology /Water Quality*). Therefore, the project is consistent with this policy.
E 2	E 2.5	Encourage and facilitate construction and land development techniques that minimize water quality impacts from urban development.	yes	See above under E 2.4.
E 2	E 2.6	Maximize the protection of potable water supply resources from pollutants.	yes	See above under E 2.4.
E 3	E 3.1	Promote state-of-the-art water conservation practices in existing and new development, where proven to be safe and environmentally sound.	yes	MWD, SDCWA, and the Sweetwater Authority (agencies involved in provision of potable water to the Proposed Project site) are engaged in substantial efforts to improve the reliability of their water supplies, including conservation and recycled water. As these programs and incentives are developed, they would be incorporated into the project planning process as each specific project is pursued. Further, the project would not preclude the City from establishing and carrying out water conservation education efforts, incentive programs (i.e., low-flush toilet change out or rebate programs). The Proposed Project would be consistent with this policy.

Table 5.10-1. General Plan Consistency Table

Objective	Policy	Text	Consistent?	Consistency Analysis
E 3	E 3.2	Promote the use of low water demand landscaping and drought tolerant plant materials in both existing and new development.	yes	The Proposed Project would utilize a drought-tolerant and native plant landscape palette. Further, only non-invasive plants would be utilized around the perimeter of the project. These project features would reduce water-intense landscape components and help in the Citywide effort of promoting and use of low water demand landscaping.
E 3	E 3.3	Where safe and feasible, promote and facilitate the continued use of recycled water in new developments, and explore opportunities for the use of recycled water in redevelopment projects.	yes	The Proposed Project would not preclude the use of localized recycled water to enhance water conservation. Provisions of the project have been included to ensure the reuse of localized grey water sources; therefore, the project would not conflict with this policy.
E 3	E 3.5	Require the preparation and implementation of Water Conservation Plans for large development and redevelopment projects in accordance with the City's Water Conservation Plan Guidelines or its equivalent, pursuant to the City's Growth Management Program.	yes	The Proposed Project is being designed to be within the assumptions of the City's Landscape Water Conservation Ordinance, which would result in consistency with this policy aimed at water conservation.
Objective E-6		Improve local air quality and reduce greenhouse gas emissions by minimizing the release of air pollutants and toxic air contaminants and limiting the exposure of people to such pollutants.	Yes	the project would not conflict with any of the applicable CAP strategies designed to reduce GHG emissions within the City, including measures to reduce GHG emission from energy, transportation, water use, and solid waste generation during construction and operations.
E 6	E 6.1	Encourage compact development featuring a mix of uses that locate residential areas within reasonable walking distance to jobs, services, and transit.	yes	The Proposed Project utilizes several key components of smart growth/transit-oriented development. The project would consist of a mixture of light industrial, business park and commercial uses and would bring employment opportunities to the greater Bayfront area, which includes other uses, such as residential, commercial tourist, civic/cultural, and open space uses within the same area. These areas would be connected by vehicular roadways as well as paseos and pathways which provide multiple connections to existing regional transit facilities.

Table 5.10-1. General Plan Consistency Table

Objective	Policy	Text	Consistent?	Consistency Analysis
E 6	E 6.2	Promote and facilitate transit system improvements in order to increase transit use and reduce dependency on the automobile.	yes	See below under all LUT 17 policies.
E	E 6.3	Facilitate the use of alternative fuel and low- and zero-emission vehicles and equipment in the community.	Yes	Over the life of the project, the truck fleet would turn over and utilize newer engines with stricter emissions standards. Additionally, as a part of PDF-GHG-1, the project would include a leasing preference for tenants that utilize a truck fleet that includes alternative/zero-emissions vehicles.
E 6	E 6.4	Avoid siting new or re-powered energy generation facilities and other major toxic air emitters within 1,000 feet of a sensitive receiver, or the placement of a sensitive receiver within 1,000 feet of a major toxic emitter.	yes	The proposed project does not involve the construction of new or re-powered energy generation facilities.
E 6	E 6.7	Encourage innovative energy conservation practices and air quality improvements in new development and redevelopment projects consistent with the City's Air Quality Improvement Plan Guidelines or its equivalent, pursuant to the City's Growth Management Program.	yes	the project is anticipated to consume approximately 17,988,956 kilowatt hours of electricity per year. The most recent energy data from the California Energy Commission shows that in 2022 the County of San Diego consumed 20,242 gigawatt hours (GWh) (CEC 2023c). The project would represent a 0.9% increase in the total demand for electricity. The project proposes industrial and commercial uses reflecting contemporary energy efficient/energy conserving designs and operational programs. Uses proposed by the project are not inherently energy intensive, and the project electricity demands in total would be comparable to other projects of similar scale and configuration. Additionally, the project would be required to comply with the applicable Title 24 standards and Project Design Feature (PDF) GHG-2, which requires building efficiencies and the provision of solar photovoltaics, and would further ensure that the project energy demands would not be inefficient, wasteful, or otherwise unnecessary and impacts would be **less than significant.**

Table 5.10-1. General Plan Consistency Table

Objective	Policy	Text	Consistent?	Consistency Analysis
E 6	E 6.10	The siting of new sensitive receivers within 500 feet of highways resulting from development or redevelopment projects shall require the preparation of a health risk assessment as part of the CEQA review of the project. Attendant health risks identified in the Health Risk Assessment (HRA) shall be feasibly mitigated to the maximum extent practicable, in accordance with CEQA, in order to help ensure that applicable federal and state standards are not exceeded.	yes	The closest sensitive receptors to the project site are existing single-family residences east of I-5, and east of the project Site's boundaries. Construction and operational HRAs were performed and impacts were discussed in Section 5.2, Air Quality of the EIR. As stated therein, impacts were determined to be significant during construction and operation and mitigation measures were included. Implementation of the mitigation measures would reduce impacts to below a level of significance.
E 6	E 6.11	Develop strategies to minimize carbon monoxide (CO) hot spots that address all modes of transportation.	yes	Given that proposed development will not result in traffic that exceeds traffic volumes considered in the County's General Plan Update analysis, coupled with the considerably low level of CO concentrations in the project area (, and continued improvements in vehicle emissions, the project is not anticipated to result in CO "hot spots." Consequently, implementation of the project would not result in CO concentrations in excess of the health protective CAAQS or NAAQS, and as such, would not expose sensitive receptors to significant pollutant concentrations or health effects. Therefore, impacts related to sensitive receptor exposure to substantial CO concentrations would be less than significant, and no mitigation measures are required.
E 6	E 6.12	Promote clean fuel sources that help reduce the exposure of sensitive uses to pollutants.	yes	The Proposed Project would not preclude the City's promotion of clean fuel sources. Further, the project's integration of transit-oriented development, transit support systems, and pedestrian/bicycle linkages would further assist with reduction of pollutant emissions. The Proposed Project would be consistent with this policy.
E 6	E 6.13	Encourage programs and infrastructure to increase the availability and usage of energy-efficient vehicles, such as hybrid electric vehicles, electric vehicles, or those that run on alternative fuels.	yes	The Proposed Project would not preclude the City's promotion of clean fuel sources and energy-efficient vehicles. Further, the project's integration of transit-oriented development, transit support systems, and pedestrian/bicycle linkages would further assist with

Table 5.10-1. General Plan Consistency Table

Objective	Policy	Text	Consistent?	Consistency Analysis
				reduction of pollutant emissions. The Proposed Project would be consistent with this policy.
E 6	E 6.15	Site industries: and other stationary emitters in a way that minimizes the potential impacts of poor air quality on homes, schools, hospitals, and other land uses where people congregate, and disadvantaged populations.	Yes	Planning Areas A and B-1 may include refrigerated uses; accordingly, back-up generators may be required during emergency outages. One 500-hp emergency back-up generator was included for each building in Planning Areas with potential refrigerated uses (A and B-1). Emergency backup diesel generators are considered stationary sources and subject to permitting from the SDAPCD. The modeling assumed the generators would be consistent with statewide average emission factors for a 2030 operational year and would operate up to 50 hours annually. In addition, the project site is not located in close proximity to homes, schools, hospitals, or other land uses where people congregate or disadvantaged populations.
E 6	E 6.16	Encourage the use of bicycles through support of bike share opportunities, community bike programs, and the provision of bicycle parking opportunities such as bike racks and bike lockers.	Yes	Future tenants of the project would provide bicycle parking and transit passes in accordance with MM AQ-8.
E 6B		Prioritize greening efforts to keep air, water, and land clean	Yes	The project includes measures and design features that reduce greenhouse gas and air quality emissions in an effort to keep air clean; the project includes a SWQMP and would implement BMPs in an effort to keep polluted water from running off site; and the project would comply with the City's Municipal Code related to solid waste in an effort to keep the land clean.
E 6B	E.6.B.1	Protect and develop shade tree cover along streets and within parking lots as a priority, particularly in new developments or tree-deficient areas.	N/A	This action is not within the purview of this project and is instead directed towards the City to implement.
E 6B	E.6.B.2	Preferentially plant female street trees to reduce pollen, especially in the most populated areas.	N/A	This action is not within the purview of this project and is instead directed towards the City to implement.

Table 5.10-1. General Plan Consistency Table

Objective	Policy	Text	Consistent?	Consistency Analysis
E 6B	E.6.B.3	Prioritize natural filtration, as opposed to impermeable hardscaping, within new development projects, along roadways, and adjacent to stream and river banks	N/A	This action is not within the purview of this project and is instead directed towards the City to implement.
E 6B	E.6.B.4	Update the building code to support best practices in “green building” design, construction, and operations	N/A	This action is not within the purview of this project and is instead directed towards the City to implement.
E 6B	E.6.B.5	Provide fast-track permitting for projects that implement “green building” design and construction.	N/A	This action is not within the purview of this project and is instead directed towards the City to implement.
E 6B	E.6.B.6	Encourage or require all new building construction to incorporate green roofs and encourage conversions of existing roof space to green roofs to reduce heat island effect.	N/A	This action is not within the purview of this project and is instead directed towards the City to implement.
E 7		Promote energy conservation through the efficient use of energy and through the development of local, non-fossil fuel-based renewable sources of energy.	Yes	See responses below.
E 7	E 7.1	Promote development of regulations and building design standards that maximize energy efficiency through appropriate site and building design and through the use of energy-efficient materials, equipment, and appliances.	yes	Where possible, the project would incorporate materials with recycled content to divert the amount of waste generated by construction and demolition. In addition, photovoltaic (PV) systems will be installed on each building to meet 50% of forecasted electricity demand.
E 7	E 7.7	Support tree planting programs that will be implemented to reduce energy needs.	yes	The Proposed Project would utilize a variety of energy efficiency programs, one of which is tree planting. The Proposed Project would therefore help the City achieve this policy.
E 8	E 8.1	Promote efforts to reduce waste, minimize the need for additional landfills, and provide economically and environmentally sound resource recovery, management, and disposal facilities.	yes	It should be noted that all discretionary projects in the City of Chula Vista would be subject to the City's design review process which would provide a process within which to outline a project's specific waste reduction measures. The Proposed Project would therefore be consistent with this policy.

Table 5.10-1. General Plan Consistency Table

Objective	Policy	Text	Consistent?	Consistency Analysis
E 8	E 8.2	Support the development of composting programs for commercial and residential development.	yes	It should be noted that all projects in the City of Chula Vista would be subject to the City's design review process which would provide a process within which to outline a project's specific waste reduction measures, including commercial composting facilities. The Proposed Project would therefore be consistent with this policy.
E 8	E 8.3	Implement source reduction strategies, including curbside recycling, use of small collection facilities for recycling, and composting.	yes	It should be noted that all projects in the City of Chula Vista would be subject to the City's design review process which would provide a process within which to outline a project's specific waste reduction measures, including communal recycling facilities. The Proposed Project would therefore be consistent with this policy.
E 9	E 9.1	Continue to assess and mitigate the potential impacts of private development and public facilities and infrastructure to cultural resources, in accordance with the California Environmental Quality Act.	yes	A full evaluation of cultural resource presence and potential impacts was prepared for this project (see *Section 5.4*). All impacts would be mitigated to a level below significance with implementation of MM-CUL-1 during construction. Further the historic rail line would be incorporated into open space design, thereby eliminating any impacts to this historic facility. Therefore, the Proposed Project would be consistent with this policy.
E 9	E 9.2	Support and encourage the accessibility of Chula Vista's important cultural resources to the public for educational; religious; cultural; scientific; and other purposes, including the establishment of museums and facilities accessible to the public, where such resources can be appropriately studied, exhibited, curated, etc.	N/A	This action is not within the purview of this project and is instead directed towards the City to implement.
E 9	E 9.3	Discourage disruption, demolition, and other negative impacts to historic cultural resources.	yes	See above E 9.1.
E 10	E 10.1	Continue to assess and mitigate the potential impacts of private development and public facilities and infrastructure to paleontological resources in accordance with the California Environmental Quality Act.	yes	The Proposed Project was subject to a full evaluation of potential impacts to sensitive paleontological resources (see *Section 5.6*). Mitigation Measure MM-GEO-1, in the form of monitoring during construction, provides a road map for the City to ensure that construction activities do not impact unknown paleontological resources. The

Table 5.10-1. General Plan Consistency Table

Objective	Policy	Text	Consistent?	Consistency Analysis
				Proposed Project would therefore be consistent with this policy.
E 11	E 11.1	Provide an integrated network of open space areas, as needed, throughout the City to serve residents, as well as to serve as a regional asset and attractor of visitors (e.g., on the Bayfront and within the Otay River Valley).	N/A	This action is not within the purview of this project and is instead directed towards the City to implement.
E 11	E 11.2	Plan for the long-term preservation and enhancement of open space within the Chula Vista Greenbelt.	N/A	This action is not within the purview of this project and is instead directed towards the City to implement.
E 11	E 11.3	Conserve open space within the Chula Vista Greenbelt through public acquisition of private property and other acceptable conservation methods.	N/A	This action is not within the purview of this project and is instead directed towards the City to implement.
E 11	E 11.7	Expand upon and encourage urban community-based “green” infrastructure that is distinct from habitat conservation (e.g., community, neighborhood, and pocket parks, disturbed canyons, community and roof gardens, and vegetated drainages) and ensure that such facilities are integrated into new development and redevelopment in western Chula Vista.	N/A	This action is not within the purview of this project and is instead directed towards the City to implement.
E 11	E 11.8	Develop a greenbelt park and/or open space system across the Bayfront to link the Sweetwater and Otay rivers and to buffer sensitive natural resources from development.	N/A	This action is not within the purview of this project and is instead directed towards the City to implement.
E 11	E 11.10	Encourage the retention of open space areas, including undeveloped natural areas and utility corridors, wildlife corridors, and key scenic corridors	yes	The existing SDG&E utility corridor running between Planning Area A and Planning Areas B1 and B2 will remain open space. A significant portion of the Bayfront area will be preserved as open space or wildlife corridors/refuges which both help provide scenic corridors. The Proposed Project would therefore be consistent with this policy.

Table 5.10-1. General Plan Consistency Table

Objective	Policy	Text	Consistent?	Consistency Analysis
E 12	E 12.1	Collaborate with San Diego County, the City of San Diego, and other applicable agencies to provide connections between Chula Vista's open space and trails network and the regional network, in accordance with the Chula Vista MSCP Subarea Plan and Otay Valley Regional Park Concept Plan.	yes	See above E 11.1. Further, the project would not preclude the City from collaborating with other jurisdictions to promote a more coordinated open space network.
E 12	E 12.2	Explore opportunities for connections to the regional open space and trails network through developments within the City adjacent to the network as development proposals are reviewed and processed, and work with project proponents and applicable agencies to plan, develop, and manage such connections.	yes	See above E 11.1.
E 14	E 14.1	To the maximum extent practicable, protect against injury, loss of life, and major property damage through engineering analyses of potential seismic hazards, appropriate engineering design, and the stringent enforcement of all applicable regulations and standards.	yes	Geotechnical Investigation Reports (Geotechnical Reports) were prepared by Geocon Inc. The reports are provided as Appendices G1 and G2 to the EIR. Impacts associated with seismic strong ground motion and surface rupture, soils, liquefaction and seismically induced settlement, and geologic hazards were determined to be less than significant. Future development would be required to conform to local and state engineering design standards to ensure potential impacts are minimized and avoided. The Proposed Project would therefore be consistent with this policy.
E 14	E 14.2	Prohibit the subdivision, grading, or development of lands subject to potential geologic hazards in the absence of adequate evidence demonstrating that such development would not be adversely affected by such hazards and would not adversely affect surrounding properties.	yes	See above E 14.1.
E 14	E 14.3	Require site-specific geotechnical investigations for proposals within areas subject to potential geologic hazards and ensure implementation of all measures deemed necessary by the City	yes	See above E 14.1.

Table 5.10-1. General Plan Consistency Table

Objective	Policy	Text	Consistent?	Consistency Analysis
		Engineer and/or Building Official to avoid or adequately mitigate such hazards.		
E 14	E 14.5	Wherever feasible, land uses, buildings, and other structures determined to be unsafe from geologic hazards shall be discontinued, removed, or relocated.	yes	See above E 14.1.
E 15	E 15.1	Prohibit proposals to subdivide, grade, or develop lands that are subject to potential flood hazards, unless adequate evidence is provided that demonstrates that such proposals would not be adversely affected by potential flood hazards and that such proposals would not adversely affect surrounding properties. Require site-specific hydrologic investigations for proposals within areas subject to potential flood hazards; and implement all measures deemed necessary by the City Engineer to avoid or adequately mitigate potential flood hazards.	yes	The majority of the site is located within FEMA Zone X, which is an area with a 0.2% annual chance flood hazard (i.e., 500-year flood hazard), or area of 1% annual chance flood (i.e., 100-year flood) with average depth less than one foot, or with drainage areas of less than one square mile. The northern portion of the site is located within Zone X, Area of Minimal Flood Hazard.
E 15	E 15.2	Wherever feasible, land uses, buildings, and other structures determined to be unsafe from flood hazards shall be discontinued, removed, or relocated.	yes	See above E 15.1. It should be noted that the lands within the existing floodplain do not contain existing buildings or structures that could pose a risk to inhabiting individuals or businesses. The project would therefore be consistent with this policy.
E 17	E 17.1	Clean contaminated sites to protective limits to ensure that planned future uses of such sites and public health and safety are not compromised.	yes	Contaminated soil on site is in the process of being remediated according to a RWQCB Cleanup and Abatement Order. The site will be graded and remediated prior to construction of the proposed project.
E 17	E 17.2	Prior to the redevelopment of contaminated sites, ensure adequate remediation in accordance with the recommendations of appropriate environmental assessments and consistent with all applicable regulations and standards.	yes	See above E 17.1.
E 18	E 18.1	Provide convenient and affordable household hazardous waste collection facilities and services	yes	All discretionary projects within the City of Chula Vista would be subject to the City's design review guidelines,

Table 5.10-1. General Plan Consistency Table

Objective	Policy	Text	Consistent?	Consistency Analysis
		for residents and small businesses, including City facilities, community collection events, and curbside collection.		which would provide the opportunity to evaluate hazardous waste disposal facilities throughout proposed residential and other ancillary uses. Reliance on this existing City design review process would result in consistency with this policy.
E 20	E 20.2	Through the environmental review of proposed developments, in accordance with the California Environmental Quality Act, the City shall ensure that significant and potentially significant adverse effects from facilities using, storing, and handling hazardous materials and waste to existing and planned surrounding land uses will be avoided.	yes	Hazards and hazardous materials is analyzed in Section 5.8 of the EIR. As stated therein, based on proposed light industrial zoning, hazardous materials used during the operation of individual projects within the Specific Plan area would include various commercially available hazardous materials and cleaning products. When used in compliance with manufacturer's recommendations and applicable regulations, these chemicals do not result in a risk to human health or the environment. The routine transport, use, and/or disposal of these substances would be subject to applicable federal, state, and local health and safety laws and regulations, which would minimize risks associated with their use.
E 20	E 20.3	Prior to the issuance or renewal of business licenses for businesses involving hazardous materials and/or generating hazardous waste, the City shall continue to require licensees to prepare and submit an acceptable Business Plan and Risk Management Prevention Program to the County Department of Environmental Health, as applicable, and to obtain all other necessary licenses and permits.	yes	All businesses that seek a license to operate in future office, retail, or commercial spaces within the project site shall require a license from the City. Should the business necessitate hazardous materials, the City would require a Business Plan and Risk Management Prevention Program prior to issuance of licenses and permits. The Proposed Project would therefore be consistent with this policy.
E 21	E 21.1	Apply the exterior land use-noise compatibility guidelines listed in *Table 9-2* of this Environmental Element to new development, where applicable, and in light of project-specific considerations.	yes	A noise analysis was prepared for the Proposed Project (see *Section 5.11, Noise*). This analysis was conducted in accordance with City of Chula Vista guidelines applicable at the time of preparation. The noise analysis determined that all noise impacts would be less than significant and no mitigation measures are required. The Proposed Project would therefore be considered consistent with this policy.

Table 5.10-1. General Plan Consistency Table

Objective	Policy	Text	Consistent?	Consistency Analysis
E 21	E 21.2	Where applicable, the assessment and mitigation of interior noise levels shall adhere to the applicable requirements of the California Building Code with local amendments and other applicable established City standards.	yes	The noise assessments that have been prepared have followed, and successive assessments that will analyze project-specific building plans as they are proposed would follow, all California Building Code, local amendments, and other City criteria, such as the noise ordinance. The Proposed Project would therefore be consistent with this policy.
E 21	E 21.3	Promote the use of available technologies in building construction to improve noise attenuation capacities.	yes	While specific construction techniques and materials are not known at this point in the planning process, it is assumed that the developers and builders would attempt to attenuate as much noise as possible (in addition to what is required by City and Building Code guidelines) to have as marketable a building/dwelling unit as possible. The Proposed Project would therefore be consistent with this policy.
E 21	E 21.4	Continue to implement and enforce the City's noise control ordinance.	yes	The noise analysis utilized guidance provided by the City's noise ordinance. Project construction times and techniques would adhere to the City's noise ordinance. The Proposed Project would therefore be consistent with this policy.
E 22	E 22.1	Work to stabilize traffic volumes in residential neighborhoods by limiting throughways and by facilitating the use of alternative routes around, rather than through, neighborhoods.	yes	The Proposed Project has been designed to encourage non-motorized transportation. Further, no residential uses are proposed in the project site and circulation routes leading to and within the site do not traverse residential neighborhoods. The Proposed Project would therefore be consistent with this policy.
E 22	E 22.2	Explore the feasibility of using new technologies to minimize traffic noise, such as use of rubberized asphalt in road surface materials.	yes	All projects within the City of Chula Vista would be subject to the City's design review process. This process entails review by a variety of City departments, including traffic and transportation. During review and coordination with the City's traffic/transportation staff, the applicability and feasibility of implementing alternative technologies to reduce noise would be evaluated. Reliance on the City's existing design review

Table 5.10-1. General Plan Consistency Table

Objective	Policy	Text	Consistent?	Consistency Analysis
				process would ensure consistency with this policy to the extent feasible.
E 22	E 22.3	Employ traffic calming measures, where appropriate, such as narrow roadways and on-street parking, in commercial and mixed-use districts.	yes	The Proposed Project would implement identified traffic calming measures at the project frontage and within 0.25 mile of the project site.
E 22	E 22.4	Encourage walking, biking, carpooling, use of public transit, and other alternative modes of transportation to minimize vehicular use and associated traffic noise.	yes	See LUT 17 and LUT 18, below.
E 22	E 22.5	Require projects to construct appropriate mitigation measures in order to attenuate existing and projected traffic noise levels, in accordance with applicable standards, including the exterior land use/noise compatibility guidelines listed in *Table 9-2* of this Environmental Element.	yes	A noise analysis was prepared for the Proposed Project (see *Section 5.11, Noise*). This analysis was conducted in accordance with City of Chula Vista guidelines applicable at the time of preparation. The noise analysis determined that all noise impacts would be less than significant and no mitigation measures are required. The Proposed Project would therefore be considered consistent with this policy.
E 23	E 23.2	Plan for the equitable distribution of public facilities and services.	yes	The Proposed Project is in the Bayfront, which is planned for provision of a variety of public services and facilities to both future residents and visitors of the Bayfront as well as existing City residents and visitors who will have enhanced access to Bay resources, open space resources, and new civic/cultural gathering spots. The project would therefore help the City achieve this policy of extending public facilities and services into an area not well served by such.
E 23	E 23.3	Avoid siting industrial facilities and uses that pose a significant hazard to human health and safety in proximity to schools or residential dwellings.	yes	The proposed project does not include industrial facilities that would pose a significant hazard to human health and safety in proximity to schools or residential dwellings. The Proposed Project would therefore be consistent with this policy.
E 23	E 23.4	Build new schools and residential dwellings with sufficient separation and buffering from industrial	yes	See above E 23.3.

Table 5.10-1. General Plan Consistency Table

Objective	Policy	Text	Consistent?	Consistency Analysis
		facilities and uses that pose a significant hazard to human health and safety.		
E 23	E 23.5	Promote more livable communities by expanding opportunities for transit-oriented development.	yes	See LUT 18, below.
Land Use and Transportation				
LUT 1	LUT 1.1	Ensure that land uses develop in accordance with the Land Use Diagram and Zoning Code in an effort to attain land use compatibility.	yes	The proposed project would be developed in an area compatible with surrounding land uses. The project includes a Specific Plan that would provide new zoning for the site to govern future development and design.
LUT 1	LUT 1.4	Seek to achieve an improved balance between jobs and housing in Chula Vista.	yes	The Proposed Project supports land uses that will bring employment opportunities to the Bayfront. The project includes a mixture of industrial/commercial/office uses that complement the surrounding uses and together will create a greater jobs/housing balance for the City. The project would provide a mixture of jobs within a distinct district within the City.
LUT 1	LUT 1.7	Provide high-quality public facilities, services, and other amenities within close proximity to residents.	Yes	While no residents exist immediately adjacent to the project site, the project would provide high-quality facilities, services, and other amenities in an area easily accessible to residents via multi-modal transportation.
LUT	LUT 1.12	Encourage regional-serving, high-volume retail or other uses to locate near freeway access to minimize traffic on City streets	Yes	The project would provide business park, industrial, and visitor serving uses in an area with easy access to the freeway, which would minimize traffic on City streets.
LUT 1	LUT 1.17	Allow office uses that are associated with complementary commercial service businesses in commercial service areas.	Yes	The project includes a mixture of industrial/commercial/office uses that complement the surrounding uses and together will create a greater jobs/housing balance for the City.
LUT 1	LUT 1.19	Evaluate land use intensities in conjunction with the review of any zone change and/or General Plan Amendment to permit density or modify intensity. Factors to be considered include, but are not limited to, the maximum intensity allowed for the applicable land use designation in the General Plan, traffic circulation patterns,	yes	The project's LMA (Appendix K) provides potential effects relative to consistency with LOS policies used by the City over each of the study intersections. Pursuant to Public Resources Code Section 21099(b)(2) and CEQA Guidelines Section 15064.3(a), a project's effect on automobile delay is not considered a significant environmental effect, therefore, no further discussion is

Table 5.10-1. General Plan Consistency Table

Objective	Policy	Text	Consistent?	Consistency Analysis
		environmental constraints, and compatibility with surrounding land uses.		required. However, the project would construct improvements or pay for its fair share towards roadway and/or intersection improvements such as signalization or optimizing signal timings to improve mobility around the project site. As shown in the LMA, the project would be fully responsible for signalizing the Bay Boulevard & G Street and Project Driveway & H Street intersections and retiming the signals at the I-5 Northbound Ramps & E Street, Bay Boulevard & H Street, I-5 Northbound Ramps & H Street, and I-5 Northbound and Southbound Ramps & J Street intersections. The Project would contribute its fair share towards the construction of a traffic signal or roundabout at the Bay Boulevard & F Street. The Project would contribute its fair share towards the construction of a traffic signal at the J Street and L Street intersections with Bay Boulevard. All proposed improvements would achieve LOS D or better conditions during both peak periods except for the roundabout at Bay Boulevard & F Street. The improvements identified in the LMA are recommendations and the final improvement plan and project funding responsibility will be defined and documented in a separate Rohr/Wohl Specific Plan Transportation Conditions of Approval memo.
LUT 1	LUT 1.20	Redevelop the Bayfront Planning Area as a world-class Bayfront that will benefit citizens and visitors through the development of entertainment, retail, cultural, residential, office and parks and the preservation of natural open spaces.	Yes	The proposed project is being developed as part of the Bayfront that will provide a benefit to the citizens and visitors of the area. The project includes a mix of industrial/commercial/office uses that complement the surrounding uses and together will create a greater jobs/housing balance for the City.
LUT 2	LUT 2.1	Locate Mixed-Use Transit Focus Areas where major transit stations exist or are planned.	yes	The Proposed Project would result in a mixture of light industrial, business park, and commercial uses near existing San Diego Trolley and City of Chula Vista Transit System stops.

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Objective	Policy	Text	Consistent?	Consistency Analysis
LUT 2	LUT 2.2	Locate the highest development intensities and residential densities within Mixed-Use Transit Focus Areas where strong City Gateway elements exist or key urban activity areas occur.	yes	The Proposed Project would result in high-intensity employment and commercial uses being located in a Mixed-Use Transit Focus Area.
LUT 2	LUT 2.3	Limit the location of high-rise structures to within the E Street and H Street Transit Focus Areas at I-5, and the Eastern Urban Center area of Otay Ranch.	yes	High-rise structures are not proposed within the Project Area.
LUT 2	LUT 2.4	High-rise buildings will be subject to discretionary review in order to ensure they are a positive addition to the City, in accordance with the following provisions: 1) the building must reflect unique, signature architecture that symbolizes the City and can be immediately recognized as a positive Chula Vista landmark; 2) the building must be accompanied by clear public benefits in acceptance of the height, such as increased public areas, plazas, fountains, parks or paseos, extensive streetscape improvements, or other public venues or amenities, 3) The overall building height and massing must reflect appropriate transitions to surrounding areas, in accordance with the future vision for those areas, or if the building is on the periphery of an area of change, to the adjoining neighborhood. Specific Plans, General Development Plans/Sectional Planning Area Plans or other zoning regulations will provide the basis for defining such transitions.	yes	Design standards for scale and massing of the Proposed Project are in Section 8 of the Specific Plan. Further, no high-rise buildings are proposed and implementing building designs would be subject to the City's design review process which would provide for opportunity to ensure consistency with City design goals. This existing process would allow for consistency with this policy.
LUT 3	LUT 3.3	Buildings within the Transit Focus Areas (TFAs) should not adversely affect public views or view corridors, and should be designed to be sensitive to adjacent buildings and areas.	yes	The project is located within a TFA. The project would not block views to the Bay and the setbacks along H Street Corridor, and pedestrian walkways would provide opportunities to preserve scenic views available within and adjacent to the area. The Proposed Project would be consistent with this policy.

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Objective	Policy	Text	Consistent?	Consistency Analysis
LUT 4	LUT 4.6	Minimize through circulation design and/or traffic-calming features (to the maximum extent practicable) the use of neighborhood streets in stable residential neighborhoods for regional or cut-through traffic, to protect those neighborhoods from adverse traffic effects. This would include access to and from side streets and alleys.	yes	The proposed project is not within a residential neighborhood and would not result in cut through traffic. The project is consistent with this policy.
LUT 5	LUT 5.1	Promote mixed-use development, where appropriate, to ensure a pedestrian-friendly environment that has opportunities for housing, jobs, childcare, shopping, entertainment, parks, and recreation in close proximity to one another.	yes	The Proposed Project provides for a mix of employment and commercial uses within close proximity to the mix of uses planned in the Bayfront. Therefore, the Proposed Project would be consistent with this policy.
LUT 5	LUT 5.2	Encourage new development that is organized around compact, walkable, mixed-use neighborhoods and districts in order to conserve open space resources, minimize infrastructure costs, and reduce reliance on the automobile.	yes	The Proposed Project would result in a mix of employment and commercial uses near high-density residential, shopping, jobs, open/civic spaces, and transit. Retail uses would be included at the street level to create a village atmosphere and pedestrian-friendly area. Therefore, the Proposed Project would be consistent with this policy.
LUT 5	LUT 5.11	Endeavor to reduce the number of peak hour automobile trips by supporting increased services near workplaces.	yes	The Proposed Project includes retail and commercial land uses in close proximity to office and other commercial/retail land uses connected by a pedestrian-friendly environment that would facilitate walking to purchase lunch, taking an afternoon break without driving a car, etc. The Proposed Project would therefore be consistent with this policy.
LUT 5	LUT 5.12	Minimize local and regional traffic by concentrating higher-density employment near major transit services.	yes	The Proposed Project is located in close proximity to two San Diego Trolley stops as well as Chula Vista Transit System stops. The project site design provides for integration of proposed land uses into the local transit system. Providing convenient access to transit would have the potential to contribute to reduced local and regional traffic.

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Objective	Policy	Text	Consistent?	Consistency Analysis
Goal LUT 6		A circulation/mobility system that provides safe travel by any mode, meets the needs of travelers of all ages and abilities and is well-integrated with the City's land uses.		
LUT 6	LUT 6.2	Require that proposed development plans and projects consider and minimize project impacts upon surrounding neighborhoods.	yes	The Proposed Project has considered the existing surrounding environment, including projects currently under construction, and impacts have been discussed throughout the EIR. Impacts of the project on surrounding land uses have been adequately analyzed and the project is consistent with this policy.
LUT 6	LUT 6.3	Require that the design of new residential, commercial, or public developments is sensitive to the character of existing neighborhoods through consideration of access, compatible building design and massing, and building height transitions, while maintaining the goals and values set forth in the General Plan. Within TFAs [Transit Focus Areas], design provisions should include requirements for a minimum building stepback of 15 feet for every 35 feet in height, for edges abutting residential uses.	yes	Design standards for access, architecture, scale, form, massing, and articulation of the proposed project are provided in Chapter 8 of the Specific Plan (Appendix B). Further, new residential uses are not proposed, and the site does not abut residential uses. Future building designs proposed on the project site would be subject to the City of Chula Vista's (City) design review process, which would provide for opportunity to ensure consistency with City design goals and overall compatibility with the surrounding area (that includes business park/research uses to the north, and a future 22-story resort hotel and convention center to the west).
LUT 6	LUT 6.5	Require, through sensitive and attractive design, that neighborhood retail centers and commercial service buildings are compatible with the surrounding neighborhood.	yes	See Response to LUT 6.3.
LUT 6	LUT 6.8	Require that any land use that handles, generates, and/or transports hazardous substances will not negatively impact existing or future sensitive receptors/land uses, as defined by state and federal regulations.	yes	The Proposed Project may result in business or individual use of chemicals. It is assumed that all chemicals would be transported, stored, used, and disposed of in accordance with manufacturer's recommendations. It should be noted that specific hazardous material use may necessitate a permit from the City at which time risk assessment plans would be reviewed and verified for adequacy. The Proposed Project would be consistent

Table 5.10-1. General Plan Consistency Table

Objective	Policy	Text	Consistent?	Consistency Analysis
				with the City's goal of protecting land uses from the environmental dangers of hazardous material use.
LUT 6	LUT 6.9	Coordinate with adjacent landowners, cities, and San Diego County in establishing compatible land uses for areas adjacent to the City's boundaries.	yes	The project planning process has involved adjacent land use agencies and landowners.
LUT 7	LUT 7.1	Protect adjacent, stable residential neighborhoods by establishing guidelines that reduce the potential impacts of higher intensity mixed use, commercial, and urban residential developments (i.e., transitional areas).	yes	Compatible adjacent land uses are proposed. The Proposed Project provides buffers and transition zones between sensitive adjacent development. Therefore, the Proposed Project would be consistent with this policy.
LUT 7	LUT 7.2	Require new or expanded uses to provide mitigation or buffers between existing uses where significant adverse impacts could occur.	yes	The Proposed Project is not located in areas where significant adverse impacts could occur.
LUT 7	LUT 7.3	Require that commercial and industrial development adjacent to residential or educational uses be adequately screened and buffered to minimize noise, light, glare, and any other adverse impacts upon these uses.	yes	The Proposed Project is not located in areas where significant adverse impacts could occur.
LUT 7	LUT 7.4	Require landscape and/or open space buffers to maintain a naturalized or softer edge for proposed private development directly adjacent to natural and public open space areas.	yes	The Proposed Project is not located adjacent to natural or open space areas.
LUT 7	LUT 7.5	Projects within TFAs shall provide appropriate and sufficient features to soften the transition to adjacent buildings and properties, through the following techniques. 1) Project landscape plans should include shade tree and screening plantings to reduce heat gain upon, and visually soften building edges; 2) Exterior lighting designs shall focus internally in order to reduce light pollution on neighboring properties; 3) Fencing and/or buffers shall be required to screen features such as dumpsters, rear entrances, utility and	yes	All discretionary projects within the City of Chula Vista would be subject to the City's design review process where specific setbacks, street tree placement or wall or fence specifications could be determined to most appropriately encourage pedestrian-friendly, transit-oriented environments. Design standards for access, architecture, scale, form, massing, and articulation of the proposed project are provided in Chapter 8 of the Specific Plan (Appendix B).

Table 5.10-1. General Plan Consistency Table

Objective	Policy	Text	Consistent?	Consistency Analysis
		maintenance structures and loading facilities; 4) Walls or fencing along project edges shall be articulated and incorporate features to avoid presenting a monotonous or blank wall to the street or adjacent property.		
LUT 8	LUT 8.3	Ensure that buildings are appropriate to their context and designed to be compatible with surrounding uses and enhance the desired character of their District.	yes	See Response to LUT 6.3.
LUT 9	LUT 9.1	Create consistent entry features for City entryways and gateways so people recognize that they are entering Chula Vista.	yes	The Specific Plan establishes the procedures and requirements to approve new development that celebrates history, propels the transition to technology employment in a new economy, and welcomes retail and visitor-serving uses with an inviting, activated gateway that complements the Chula Vista Bayfront. The rich maritime and industrial history of the Chula Vista Bayfront will inform a cohesive district with the unique spaces and places for a welcoming visitor gateway that accommodates the spaces and uses that will propel the innovation economy. Specific Plan Section 3-C Key Project Elements, includes a graphic that illustrates a sequence of gateways to the project site.
LUT 9	LUT 9.3	As part of the approval process for projects within designated City entryway/gateway areas, the City shall confirm that the design conforms to applicable entryway/gateway design guidelines and standards.	Yes	See Response to LUT 9.1.
LUT 11	LUT 11	Ensure that buildings and related site improvements for public and private development are well-designed and compatible with surrounding properties and districts.	Yes	As stated in the Rohr Wohl Specific Plan, project design guidelines include development of buildings, open spaces, parking, and circulation that result in a cohesive, complementary, and visually pleasing environment that is compatible with the character of the Specific Plan. Representations of future site development are shown in Figures 5.1-5b and 5.1-6b. Further, design guidelines are in place to ensure high design quality of buildings and

Table 5.10-1. General Plan Consistency Table

Objective	Policy	Text	Consistent?	Consistency Analysis
				landscape amenities (Appendix B). Through execution and implementation of the design guidelines contained in the Rohr Wohl Specific Plan, future development on the project site would be consistent with this objective and policies.
LUT	LUT 11.1	Promote development that creates and enhances positive spatial attributes of major public streets; open spaces; cityscape; mountain and bay sight lines; and important gateways into the City.	Yes	See Response to LUT 11.
LUT 11	LUT 11.2	Promote and place a high priority on quality architecture, landscape, and site design to enhance the image of Chula Vista, and create a vital and attractive environment for businesses, residents, and visitors.	Yes	See Response to LUT 11.
LUT 11	LUT 11.4	Actively promote architectural and design excellence in buildings, open space, and urban design.	Yes	See Response to LUT 11.
LUT 12	LUT 12.7	Continue to assess and mitigate the potential impacts of private development and public facilities and infrastructure to historic resources in accordance with the California Environmental Quality Act.	yes	Project implementation would not result in a significant impact to any historic resources. The location of the existing on-site historic rail line would not be changed. Further, open space and landscaping for the rail corridor would be proposed within the existing easement. The inclusion of this historic rail line into the overall land use plan/open space component of the project would encourage the preservation of unique cultural resources.
LUT 13	LUT 13	Preserve scenic resources in Chula Vista, maintain the City's open space network, and promote beautification of the City.	yes	The project site does not contain natural or built scenic resources. Planning Area A supports an aged two-story industrial warehouse–type building and a paved asphalt surface parking lot, and the remainder of the site comprises a recently demolished industrial warehouse site that presents as a large dirt lot surrounded by chain-link fencing. Through execution and implementation of the design guidelines contained in the Rohr Wohl Specific Plan, future development on the project site would improve existing site aesthetics through

Table 5.10-1. General Plan Consistency Table

Objective	Policy	Text	Consistent?	Consistency Analysis
				development of a visually cohesive, environment. Representations of future site development are shown in Figures 5.1-5b and 5.1-6b.
LUT 13	LUT 13.1	Identify and protect important public viewpoints and viewsheds throughout the Planning Area, including features within and outside the planning area, such as mountain, native habitat areas, San Diego Bay, and historic resources.	yes	Future development of the project site would not substantially impact important public viewpoints or viewsheds associated with San Diego Bay. As demonstrated above in the discussion of potential impacts to scenic vistas, implementation of the Specific Plan and construction and operation of potential future commercial, industrial, technology, and business park development in Planning Areas A, B-1, and B-2 would not result in blockage or substantial interruption of existing available views to San Diego Bay from H Street or Marina Parkway.
LUT 13	LUT 13.3	Screen unsightly industrial properties on the Bayfront, or convert such properties to uses that are consistent with the desired visual character of the Bayfront. As described in section 11.0 of this Element and the Bayfront Master Plan.	yes	Through execution and implementation of the design guidelines contained in the Rohr Wohl Specific Plan, future development on the project site would improve existing site aesthetics associated with a recently demolished industrial warehouse site through development of a cohesive, complementary, and visually pleasing environment that supports a mix of uses.
LUT 13	LUT 13.4	Any discretionary projects proposed adjacent to scenic routes, with the exception of individual single-family dwellings, shall be subject to design review to ensure that the design of the development proposal will enhance the scenic quality of the route. Review should include site design, architectural design, height, landscaping, signage, and utilities. Development adjacent to designated scenic routes should be designed to: Create substantial open areas adjacent to scenic routes through clustering development; Create a pleasing streetscape through landscaping and varied building setbacks; and	Yes	Marina Parkway (from J Street to E Street) is the sole locally designated scenic roadway in the project area. Compared to existing conditions that consist of currently vacant land (i.e., Planning Areas B-1 and B-2) and an existing aged industrial building in Planning Area A, implementation of the Specific Plan and execution of the design guidelines contained therein are intended to result in development of a cohesive, complementary, and visually pleasing environment that supports a mix of uses (Appendix B). In addition, future building designs proposed on the project site would be subject to the City's design review process, which would ensure consistency with City design goals and overall compatible with the surrounding area. Regarding signage, Section 8-

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Objective	Policy	Text	Consistent?	Consistency Analysis
		Coordinate signage, graphics and/or signage requirements, and standards.		G, Signage, of the Rohr Wohl Specific Plan requires that all signage be professionally designed and consistent across the project site.
LUT 14	LUT 14.3	Plan for high-capacity regional freeway and Transit First! facilities to adequately serve the regional travel demand resulting from the land uses associated with adjacent areas.	yes	The Proposed Project would provide a mixture of uses that would prompt transit use. Should enhanced transit services, such as vanpools or ride shares, be instigated, the critical mass from a land use perspective would be present within the Bayfront area. The Proposed Project would therefore be consistent with this policy.
LUT 16	LUT 16.1	Promote the development of well-planned communities that will tend to be self-supportive and, thus, reduce the length of vehicular trips, reduce dependency on the automobile, and encourage the use of other modes of travel.	yes	The Proposed Project would contribute employment and commercial uses to the mix of uses planned for in the Bayfront. Uses are connected by pedestrian walkways and a bike path system, thereby encouraging non-vehicular travel.
LUT 16	LUT 16.2	Ensure that new development and community activity centers have adequate transportation and pedestrian facilities.	yes	Uses would be connected by pedestrian walkways and a bike path system, thereby encouraging non-vehicular travel. Locating employment and commercial uses along the H Street corridor, the project supports enhanced connectivity to existing and planned transit service along that corridor and to the San Diego Trolley H Street Station. The Proposed Project would therefore be consistent with these policies.
LUT 16	LUT 16.3	Provide direct and convenient access to public transit stops within residential, commercial, and industrial areas.	yes	Locating employment and commercial uses along the H Street corridor, the project supports enhanced connectivity to existing and planned transit service along that corridor and to the San Diego Trolley H Street Station. The Proposed Project would therefore be consistent with these policies.
LUT 17	LUT 17.2	Direct higher-intensity and mixed-use developments to areas within walking distance of transit, including San Diego Trolley stations along E, H, and Palomar Streets, and new stations along future transit lines, including Bus Rapid Transit (BRT).	yes	The Proposed Project would result in high-intensity land uses including commercial, light industrial and business park uses within walking distance of two San Diego Trolley stops. Further, additional Bus Rapid Transit services and Green Line Shuttle services are envisioned to further connect future visitors, shops, and residents of the Bayfront with outside land uses through transit

Table 5.10-1. General Plan Consistency Table

Objective	Policy	Text	Consistent?	Consistency Analysis
				connections. Therefore, the Proposed Project would be consistent with this policy.
LUT 17	LUT 17.4	Require developers to consult and coordinate with SANDAG and the City to ensure that development is compatible with and supports the planned implementation of public transit.	yes	The Proposed Project does not specifically include new public transit stop locations. This policy is not applicable; no conflict would occur.
LUT 18	LUT 18.1	Support and encourage the use of public transit.	yes	The Proposed Project would result in high-intensity land uses including commercial, light industrial and business park uses within walking distance of two San Diego Trolley stops, therefore encouraging use of public transit.
LUT 18	LUT 18.3	Provide and enhance all feasible alternatives to the automobile, such as bicycling and walking, and encourage public transit ridership on existing and future transit routes.	yes	The project's network of pathways and bicycle facilities provide opportunities for non-motorized transportation throughout the project. The Proposed Project would therefore be consistent with this policy.
LUT 18	LUT 18.4	Use master planning techniques in new development and redevelopment projects to enable effective use of public transit.	yes	The Proposed Project as envisioned would encourage the use of transit services and non-vehicular modes of travel. The overall site design is oriented to provide a mixture of land uses connected to existing transit facilities through pedestrian/bicycle-friendly corridors. The Proposed Project would therefore be consistent with this policy.
LUT 18	LUT 18.5	Implement Transportation Demand Management (TDM) strategies, such as carpooling, vanpooling, and flexible work hours that encourage alternatives to driving alone during peak periods.	yes	See above LUT 18.4.
LUT 18	LUT 18.6	Encourage employer-based TDM strategies, such as employee transportation allowances, preferential parking for rideshare vehicles, workplace-based carpool programs, and shuttle services.	yes	See above LUT 18.4.
LUT 18	LUT 18.7	Support the location of private “telework” centers.	yes	See above LUT 18.6.
LUT 19	LUT 19.5	Plan for and promote improved access between the Palomar Street, E Street, and H Street light rail stations and land uses east of those stations and to the Bayfront. This may involve the	yes	The Proposed Project would promote improved access to existing Trolley stations at H Street through encouragement of transit connection services; establishment of pedestrian-friendly environments along

Table 5.10-1. General Plan Consistency Table

Objective	Policy	Text	Consistent?	Consistency Analysis
		construction of separate bridges or ramps connecting Chula Vista streets to transit facilities and/or a deck over I-5 to the Bayfront.		roadway corridors connecting the Bayfront to these areas; and provision of non-vehicular pathways, paseos, bikeways, and paths. Because the project would not involve areas east of I-5, the project neither encourages or discourages improved access between existing trolley stations and areas east of I-5.
LUT 20	LUT 20.1	Incorporate transit-friendly and pedestrian-friendly elements into roadway design standards, such as signal priority for transit and adequate sidewalk widths for pedestrians.	yes	The overall site design is oriented to provide a mixture of land uses connected to existing transit facilities through pedestrian/bicycle-friendly corridors. As part of the Project, sidewalks will be constructed along the Project's frontage of G Street. All Project driveways would be constructed to City standards and include warning detectible strips at the curb returns. Additionally, all Project driveways along H Street would be constructed to City standards and include warning detectible strips at the curb returns. Within the Project site, all internal roadways would have sidewalks along the roadway. There are no sidewalk gaps that would exist with the Project and pedestrians would have a continuous path from the Project to the H Street Transit Station.
LUT 21	LUT 21.3	Minimize adverse impacts of the transportation system on adjacent land uses.	yes	According to the Local Mobility Analysis prepared for the Proposed Project, identified impacts on surrounding roadways and intersections would be remediated through improvements included as part of the Proposed Project or through conditions of approval. The Proposed Project would therefore be consistent with this guideline.
LUT 21	LUT 21.4	Maintain and improve existing infrastructure for the movement of people, goods, and vehicles within and throughout the City.	yes	The Proposed Project would involve roadway improvements that would further assist with the regular movement of people, goods, and vehicles within and throughout the City. Further, the project's incorporation of transit-oriented development and support of general transit services and facilities would provide additional methods for movement of people throughout the City. The Proposed Project would therefore be consistent with this guideline.

Table 5.10-1. General Plan Consistency Table

Objective	Policy	Text	Consistent?	Consistency Analysis
LUT 21	LUT 21.5	Consider public and personal safety and comfort factors in the design of major transit centers and their connections to the surrounding area, including consideration of crime prevention through environmental design (CPTED) principles and minimizing potential vehicle/pedestrian conflicts.	yes	The specific design parameters of transit stops, bus shelters, and other areas geared toward transit service would be addressed during the City's design review process. The Proposed Project provides opportunities for active retail facing key points along H Street, providing for "Eyes on the Street." The Proposed Project would therefore be consistent with the project.
LUT 23	LUT 23.1	Encourage the use of bicycles and walking as alternatives to driving.	yes	The overall site design is oriented to provide a mixture of land uses connected to existing transit facilities through pedestrian/bicycle-friendly corridors. The proposed project would preserve the right for the City to extend the Bayshore Bikeway between the planning areas, which connects planned land uses and open spaces in the Bayfront and to regional uses beyond the Bayfront. The Proposed Project would therefore be consistent with this policy.
LUT 23	LUT 23.2	Foster the development of a system of interconnecting bicycle routes throughout the City and region.	yes	See response 23.1.
LUT 23	LUT 23.3	Preserve, restore, or provide the opportunity for a cyclist to ride a bicycle to virtually any chosen destination, in order to make the bicycle a viable transportation alternative.	yes	The Bayshore Bikeway segment between Lagoon Drive and H Street (referenced as Segment 6B in the City's ATP) is proposed to be located along the abandoned rail line between Planning Area A and B-1/B-2. This extension of the Bayshore Bikeway would be a new multi-use path with proposed cross section of 14-feet width that includes a 5-foot shared use path and a 2-foot shoulder in each direction. It should be noted that project construction, including subsequent phases of the project, would not conflict with the future construction of the proposed Bayshore Bikeway segment.
LUT 23	LUT 23.5	Provide linkages between bicycle facilities that utilize circulation element alignments and open space corridors.	yes	See response 23.3

Table 5.10-1. General Plan Consistency Table

Objective	Policy	Text	Consistent?	Consistency Analysis
LUT 23	LUT 23.6	In addition to using open space corridors, off-street bicycle trails should use flood control and utility easements. The trails shall be designed to minimize interaction with automobile cross traffic.	yes	See response 23.3. This would enhance bicycle safety and allow the Proposed Project to be consistent with this policy.
LUT 23	LUT 23.7	Provide bicycle support facilities at all major bicycle usage locations.	yes	Preliminary designs of the Proposed Project indicate that non-motorized modes of transportation would be encouraged both from a land use planning perspective (placement of buildings) and a specific site design perspective (placement and incorporation of bike racks). The Proposed Project would be consistent with this policy.
LUT 23	LUT 23.8	Provide and maintain a safe and efficient system of sidewalks, trails, and pedestrian crossings.	yes	The Proposed Project would result in an extensive network of sidewalks and pedestrian facilities, which would be removed from vehicular traffic. Specifically, Section 8C of the Specific Plan states that cross circulation between pedestrians and vehicles shall be minimized. The Proposed Project would therefore be consistent with this policy.
LUT 23	LUT 23.10	Promote the system of trails envisioned within the Chula Vista Greenbelt.	yes	The Proposed Project would provide a greenbelt/pedestrian/bicycle facility through the center of the site which would be interconnected to the Bayfront as well as to Otay and Sweetwater components of the Chula Vista Greenbelt System. The Proposed Project would therefore be consistent with this policy.
LUT 23	LUT 23.11	Implement recommendations of the City's Bikeway Master Plan and Greenbelt Master Plan.	yes	The Proposed Project would provide pedestrian and bicycle facility connections to the Otay and Sweetwater portions of the City's Greenbelt system.
LUT 23	LUT 23.12	Provide opportunities for use of personal mobility devices.	yes	The Proposed Project would provide streets, walkways, and other corridors, which would provide for opportunities to use personal mobility devices such as wheelchairs and other mobility devices.
LUT 23	LUT 23.14	Require new development projects to provide internal bikeway systems with connections to the citywide bicycle networks.	yes	See response 23.3

Table 5.10-1. General Plan Consistency Table

Objective	Policy	Text	Consistent?	Consistency Analysis
LUT 28	LUT 28.2	Encourage development of projects on larger lots and consolidated lots in order to achieve the objectives of this General Plan and to take advantage of any incentive program.	yes	The Proposed Project incorporates development on larger lots within the Bayfront area. These larger lots allow a greater diversity of urban uses to be planned in a comprehensive manner. Therefore, the Proposed Project would be consistent with this policy.
LUT 30	LUT 30.1	Consider limiting parking in appropriate areas to discourage single-occupant vehicle commuting and to reinforce non-auto travel modes, but not so limiting as to adversely affect the viability and vitality of the area.	yes	The Proposed Project includes an extensive parking plan which consists of parking lots throughout the site. Parking quantities are based on a variety of factors: intended land uses, visitor uses, and provision of transit services which would decrease parking need, etc. The project would provide sufficient parking based on applicable City requirements. The Proposed Project would therefore be consistent with this policy.
LUT 30	LUT 30.3	Emphasize the provision of short-term parking (e.g., parking duration limits, time of day, restricted parking zones) over long-term parking in commercial areas.	yes	Commercial retail areas of the site would include short-term parking.
LUT 32	LUT 32.1	Consider the joint use of parking facilities in mixed-use areas where peak parking occurs at different times of the day or week and the parking facility is within one quarter mile of the uses it will serve.	yes	Implementation of the "shared parking" concept shall be permitted where it can be demonstrated that the proposed mix of uses have predictable parking demands that do not significantly overlap.
LUT 33	LUT 33.1	Off-street surface parking areas should be located and designed in a manner that supports and does not conflict with pedestrian activity, such as to the side or rear of buildings, wherever feasible. In pedestrian-oriented areas, locate surface parking lots to the rear or side of buildings, wherever feasible.	yes	The Proposed Project includes parking lots that are located in the back of buildings, away from central pedestrian or street activity corridors. Parking lot design would be subject to the City's design review process, at which time specific landscape treatments, buffers, and orientations can be finalized in an effort to eliminate pedestrian/vehicle conflicts. The Proposed Project would therefore be consistent with this policy.
LUT 34	LUT 34.2	Provide adequate lighting for streets, parks, recreation facilities, sidewalks, and bike paths to promote their use.	yes	The Proposed Project would be subject to the City's design review process, at which time lighting standards would be determined. Lighting standards are assumed to be as low intensity as possible to safely illuminate the intended area. Further, a full lighting analysis has been

Table 5.10-1. General Plan Consistency Table

Objective	Policy	Text	Consistent?	Consistency Analysis
				prepared (see *Section 5.1, Aesthetics*), which outlines the project's potential impacts. This analysis has determined that lighting impacts would be less than significant with mitigation incorporated. The Proposed Project would be consistent with this policy.
LUT 46	LUT 46.3	Promote the development and operation of a circulator system to link and serve the Bayfront Planning Area, the Chula Vista Urban Core Subarea's commercial areas, and the H and E Street trolley stations.	yes	There are no transit stops located west of I-5. The Metropolitan Transit Service (MTS) provides transit service to the E Street and H Street trolley stops with Routes 701, 704, 705, 709, and 932. The nearest transit stops (Routes 701 and 709) to the Project are located at the H Street Transit Center and approximately a 1,000-foot walk to/from the Project. There are no sidewalk gaps in the study area and pedestrians would have a direct connection between the Project and the H Street Transit Station via the existing sidewalks. The Proposed Project would improve the circulation system in the Bayfront. The Proposed Project would be consistent with this policy.
Public Facilities and Services				
PFS 11	PFS 11.1	During review of land use issues requiring discretionary approval, coordinate with the City of Chula Vista Public Library to provide adequate library facilities that meet the needs generated by development.	yes	Prior to the approval of a building permit for any residential project within the City, the applicant shall pay a public facilities development impact fee (PFDIF) or equivalent fee in an amount calculated according to the City's PFDIF program in effect at the time of permit issuance. However, because the proposed project would not increase the number of residences or population in the City, the project is not required to pay a PFDIF for library services.
PFS 1	PFS 1.2	Plan for adequate systems and facilities to manage the City's wastewater generation, treatment, and disposal.	yes	An analysis of the Proposed Project's wastewater generation, treatment and disposal needs was prepared during the project planning process. As demonstrated in the Sewer Service Analysis (Dexter Wilson 2023), there are no off-site sewer improvements needed to redevelop the project site with the land uses proposed. In addition,

Table 5.10-1. General Plan Consistency Table

Objective	Policy	Text	Consistent?	Consistency Analysis
				the City of Chula Vista has available sewer capacity for the project both in the upgraded G Street Pump Station and in the METRO sewer system. The Proposed Project would therefore be consistent with this policy.
PFS 1	PFS 1.3	Plan and design drainage facilities and upgrade existing facilities, as necessary, to meet current needs, accommodate growth, and satisfy state and federal requirements.	yes	The Proposed Project would require a variety of stormwater improvements as well as installation of new facilities associated with new urban development planned throughout the area. The project includes installation of storm drain systems prior to final site construction. All stormwater systems would be reviewed by the City through the design review process to ensure that facilities are appropriately sized, dissipation mechanisms are adequate and any water quality parameters are incorporated into facility designs. The Proposed Project would therefore be consistent with this policy.
PFS 1	PFS 1.4	For new development, require on-site detention of stormwater flows such that, where practical, existing downstream structures will not be overloaded. Slow runoff and maximize on-site infiltration of runoff.	yes	The Proposed Project would include a variety of stormwater attenuation techniques including vegetated swales and mechanisms to slow down surface water flow across impervious surfaces. Further the stormwater system would be designed to adequately handle projected stormwater flows. The Proposed Project would be consistent with this policy.
PFS 2	PFS 2.2	As part of project construction and design, assure that drainage facilities in new development incorporate stormwater runoff and sediment control, including state-of-the-art technologies, where appropriate.	yes	A list of site design and source control measures is outlined in EIR Section 5.9, Hydrology and Water Quality, that would be required at various stages of project development in order to minimize potential stormwater quality issues. The Proposed Project would therefore be consistent with this policy.
PFS 5	PFS 5.2	Upgrade fire and emergency medical equipment, as required, to protect the public from hazards and to ensure the safety of firefighters.	yes	The proposed project would be required to pay the City's PFDIF, which would fund the City's Fire Suppression System expansion. The Proposed Project would be consistent with this policy.

Table 5.10-1. General Plan Consistency Table

Objective	Policy	Text	Consistent?	Consistency Analysis
PFS 5	PFS 5.3	Support the provision of new fire stations, as deemed necessary through the existing or updated Fire Station Master Plan.	yes	See Policy PFS 5.2 above.
PFS 5	PFS 5.4	Provide adequate law enforcement staff and equipment pursuant to Police Department strategic plans to meet established service standards.	yes	The City's PFDIF, described previously, would help cover the cost of new or expanded public facilities within the City including police facilities. The proposed project would be subject to payment of the PFDIF fees at the rate in effect at the time building permits are issued. Payment of the PFDIF would be necessary to ensure that the project contributes its fair share of the cost of police facilities and equipment needed to adequately accommodate increasing demand within the City. This provides for consistency with this policy.
PFS 5	PFS 5.7	Prior to approval of any discretionary projects, ensure that construction is phased with provision of police and fire protection services such that services are provided prior to or concurrent with need.	yes	See policies PFS 5.3 and 5.4 above.
PFS 6	PFS 6.1	Continue to require new development and redevelopment projects to demonstrate adequate access for fire and police vehicles.	yes	All discretionary projects within the City would be subject to the City's design review procedures, which would require circulation of plans to City fire and police departments to ensure adequate access for police and fire vehicles. This established City process would ensure consistency with this policy.
PFS 6	PFS 6.2	Require new development and redevelopment projects to demonstrate adequate water pressure to new buildings.	yes	All discretionary projects within the City would be subject to the City's design review procedures, which would require circulation of plans to City fire department personnel to ensure adequate water pressure is provided to new buildings. This established City process would ensure consistency with this policy.
PFS 9	PFS 9.1	Coordinate with local school districts during review of applicable discretionary approval to provide adequate school facilities, to meet needs generated by development, and to avoid	yes	The proposed project would not directly increase the number of dwelling units or population within the City; therefore, there would not be an increased number of students generated by the project. Schools are funded through the payment of state mandated school fees

Table 5.10-1. General Plan Consistency Table

Objective	Policy	Text	Consistent?	Consistency Analysis
		overcrowding, in accordance with the guidelines and limitations of Government Code 65996(b).		pursuant to Senate Bill 50/California Government Code Section 65995. CVESD and SUHSD both collect Level I fees for new commercial/industrial developments (CVESD 2020; SUHSD 2022). These fees are required to be paid by future development prior to issuance of building permits. As stated previously, the project site is located within existing CFDs for CVESD and SUHSD, which impose a special tax on property owners to finance both school districts. Any development of new school facilities resulting from these CFDs would be undertaken by the school district at that time. Pursuant to Education Code Section 17620(a)(1), the governing board can authorize the levy of a fee, charge, dedication, or other requirements against any construction within school district boundaries, and with the school district's collection of Statutory and Alternative fees developers can fully mitigate any impacts.
PFS 11	PFS 11.4	Assist the Chula Vista Public Library in identifying sources of funding for the expansion of facilities in western Chula Vista as needed, based on growth.	yes	The project would not preclude the City from taking additional action with the library to secure other sources of funding. The Proposed Project would ensure consistency with this policy.
PFS 14	PFS 14.1	Maximize the use of existing parks and recreation facilities through upgrades and additions/changes to programs to meet the needs of the community.	yes	The proposed project does not include the development of new residences and therefore would not require that additional parkland be provided. There are two existing parks less than 0.5 miles from the project site that could be used by employees of the project. The increase in demand for parks or other recreational facilities by employees of the project is anticipated to be minimal, such that there would not be a substantial increase in the physical deterioration of existing park facilities. In addition, per CVMC Section 17.10.120, the proposed project would not be required to pay development fees because there are no proposed residences within the project.

Table 5.10-1. General Plan Consistency Table

Objective	Policy	Text	Consistent?	Consistency Analysis
PFS 14	PFS 14.2	Construct new parks and recreation facilities that reflect the interests and needs of the community.	N/A	See policy PFS 14.1 above.
PFS 14	PFS 14.4	Use park dedication, location, site design, and acceptance standards, as provided in the Chula Vista Parks and Recreation Master Plan, the Park Dedication Ordinance, and the Recreation Development Impact Fee (DIF) program, as may be amended from time to time.	yes	The Proposed Project incorporates design guidelines and siting recommendations of these planning documents; however, specific park or recreational facilities would need to be reviewed against specific guidelines as individual projects are reviewed via the City's design review process. This existing City design review process would ensure consistency with this policy.
PFS 14	PFS 14.5	Work with proponents of new development projects and redevelopment projects at the earliest stages to ensure that parks, recreation, trails, and open space facilities are designed to meet City standards and are built in a timely manner to meet the needs of residents they will serve.	N/A	See policy PFS 14.1 above.
PFS 15	PFS 15.4	Promote the inclusion of park and recreation facilities in or near redevelopment areas to both serve the new development and to contribute to meeting existing park and recreation needs.	N/A	See policy PFS 14.1 above.
PFS 15	PFS 15.5	Use park dedication, location, site design, and acceptance of dedication standards, as provided in the Chula Vista Parks and Recreation Master Plan, the Park Dedication Ordinance, and the Recreation DIF program, as may be amended from time to time.	N/A	See policy PFS 14.1 above.
PFS 22	PFS 22.4	Review energy facility requests and encourage siting and design techniques that minimize community impacts. Such techniques may include undergrounding facilities, where possible; co-locating new facilities with existing utility infrastructure; locating facilities in non-residential areas; and implementing architectural details and landscaping that help facilities to blend with the surrounding area. The development and	N/A	Energy facilities are not included as part of the Proposed Project.

Table 5.10-1. General Plan Consistency Table

Objective	Policy	Text	Consistent?	Consistency Analysis
		operation of natural-gas-fired plants within the City shall utilize "best available control technology" to the greatest extent practicable.		
PFS 22	PFS 22.5	Maximize future sustainable energy options by pursuing distributed generation and planning energy transmission and transportation options that complement the development of local renewable energy options.	yes	The Proposed Project would not preclude the City's efforts to encourage sustainability by pursuing options to complement the development of local renewable energy alternatives. The Proposed Project would therefore provide for consistency with this policy.
PFS 23	PFS 23.3	Ensure adequate area is reserved early in the development process for critical electrical service facilities.	yes	The Proposed Project has incorporated electrical utility needs into project design, therefore eliminating the need for costly acquisition or site redesign to accommodate electricity. The Proposed Project would be consistent with this policy.
PFS 23	PFS 23.4	Ensure that utility facilities safely integrate into the developed landscape.	yes	All discretionary projects within the City are subject to the City's extensive design review process, where all project plans are reviewed by the public works department. During these specific project site review efforts, utility setbacks and design parameters can be incorporated. This existing process would ensure consistency with this policy.
PFS 23	PFS 23.5	Appropriate secondary land uses (such as nurseries, RV storage, and usable open space and parks, among others) should be encouraged to locate within overhead transmission facility rights-of-way, when appropriate. Trails can also be included as a secondary land use, pursuant to agreement with SDG&E.	yes	The Proposed Project incorporates the SDG&E easement along the eastern edge of the site into the overall site open space design concept, therefore providing for consistency with this policy.
PFS 25	PFS 25.1	Plan for adequate systems and facilities to manage the City's solid waste generation, treatment, and disposal.	yes	The Proposed Project was reviewed for adequate provision of solid waste generation, treatment, and disposal. Several project features are incorporated to ensure adequate timing of waste services. The Proposed Project would not conflict with this policy.

Table 5.10-2. Local Coastal Program Consistency Analysis

Relevant Coastal Act Sections	Policy (paraphrased, as appropriate)	Analysis	Consistency
Article 2	Public Access		
30210	Maximum access and recreational opportunities shall be provided for all people, consistent with public safety needs and the need to protect public rights, private property owner rights, and natural resource areas from overuse.	The proposed project includes development of a variety of open spaces and amenities that would be available to the public. These include potential incorporation of terraces, roof decks, overlooks, plazas, paseos, greenways, boardwalks, and courtyards. The project would also provide the public with walkable and bikeable access to surrounding parks such as Bayside Park and J Street Harbor Park. The Proposed Project would not interfere with the public's right of coastal access. The Proposed Project would improve the public's right to access the Bay by providing a transition between visitor-serving and residential uses of the Bayfront's future and the "working waterfront." The project would create a connected, walkable, and bikeable development with spaces for residents, workers, and visitors to enjoy the bayfront environment. As part of the project a new multi-use path that would run along a portion of the SDG&E and Rail easement, which would assist with implementation of a portion of the Bayshore Bikeway extension from G Street to H Street. The remainder of the easement would serve as parking, landscape, and provide a "green connection" through the development.	Consistent
30212	Public access to the shoreline from the nearest public roadway shall be provided in new development projects, except where it is inconsistent with public safety, where there is adequate access nearby, or where it would adversely affect agriculture.	The nearest public roadway to the shoreline and the project site is H Street. The project would include improvements to expand the sidewalk along H Street and provide landscaped setbacks and street trees on the north side of the street. The Chula Vista Bayfront Master Plan facilitates direct public access to the shoreline by these roadways and provides for parks and public uses between this road and the Bay. The proposed project would not impede public access to the shoreline and would in fact improve access around and through the Bayfront.	Consistent

Table 5.10-2. Local Coastal Program Consistency Analysis

Relevant Coastal Act Sections	Policy (paraphrased, as appropriate)	Analysis	Consistency
30212.5	Public facilities, including parking facilities, shall be distributed to mitigate the impacts of overcrowding or overuse of any single area by the public.	The Proposed Project was designed to provide enough parking to meet the parking demand of the planned uses on the project site.	Consistent
30213	Lower cost visitor and recreational facilities shall be protected, encouraged, and provided where feasible, and public recreational opportunities are proposed	In addition to existing and future facilities provided within the Bayfront, the Proposed Project specific plan land uses allow for retail and lower-cost visitor-serving uses as part of the commercial development in Planning Area B2.	Consistent
Article 3	**Recreation**		
30220	Coastal areas suited for water-oriented recreational activities shall be protected for those uses.	The Proposed Project activates the Bayfront to better serve water-oriented activities. As indicated in the Land Use and Development Standards Table in Specific Plan, water-oriented recreational activities are permitted in Planning Areas A and B2 (i.e., recreational equipment rentals: bikes, kayaks, surfboards etc.). In addition, outdoor commercial recreation uses (i.e., facilities for various outdoor sports and recreation typically where a fee is charged) are also permitted in Planning Areas A and B2.	Consistent
30222	Private lands suitable for visitor-serving commercial recreational facilities designed to enhance public coastal recreation shall have priority over all other development, except agriculture and coastal-dependent development or uses.	The Proposed Project would enhance public recreation and visitor-related activities within the Bayfront.	Consistent
Article 4	**Marine Environment**		
30231	The biological productivity and the quality of coastal waters appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, and	The implementation of required BMPs, and stringent source control measures would minimize such impacts to below a level of significance.	Consistent with mitigation

Table 5.10-2. Local Coastal Program Consistency Analysis

Relevant Coastal Act Sections	Policy (paraphrased, as appropriate)	Analysis	Consistency
	maintaining natural vegetation buffer areas that protect riparian habitats.		
30232	Protects the coastal environment against the spillage of hazardous materials and requires containment and clean-up procedures in the event that a spill does occur.	As discussed in Section 5.8, Hazards and Hazardous Materials, the proposed project provides BMPs and source control measures to ensure a spillage of hazardous materials doesn't occur. Mitigation measures proposed to address potential impacts from spillage of hazardous materials include the training of all contractor and subcontractor personnel to the appropriate practices necessary to prevent hazardous material spills and response measures in the event that a spill occurs. All construction waste, including trash and litter, garbage, other solid waste, petroleum products, and other potentially hazardous materials will be removed to a permitted hazardous waste facility to treat, store, or dispose of such materials. Containment is required for all trash to prevent unnecessary spillage. Furthermore, pursuant to the Stormwater Pollution Prevention Plan (SWPPP) prepared for the project, all hazardous materials that would be present on any portion of the construction area and site shall be identified. Potential spill or accident situations shall also be identified, along with appropriate spill response measures. Spill response materials and spill kits will be kept at the construction site.	Consistent with mitigation
30234	Provides for the protection and enhancement of commercial fishing and recreational boating industries.	As indicated in the Land Use and Development Standards Table in the RWSP, boat parts and supply stores (only permitted in PA-B2); boat sales and leasing; and boat service and repair uses are permitted in Planning Areas A and B2.	Consistent
Article 5	**Land Resources**		
30244	Requires that reasonable mitigation be provided for development that would adversely impact archaeological or	As discussed in *Section 5.4, Cultural Resources*, of this EIR, the Proposed Project would not adversely impact archaeological resources with implementation of mitigation.	Consistent with mitigation

Table 5.10-2. Local Coastal Program Consistency Analysis

Relevant Coastal Act Sections	Policy (paraphrased, as appropriate)	Analysis	Consistency
	paleontological resources identified by the State Historic Preservation Office (SHPO).	*Section 5.6, Geology and Soils*, describes the potential for paleontological resources to be encountered during construction and provides mitigation to avoid potential adverse effects.	
Article 6	**Development**		
30250	New residential, commercial, or industrial development shall be located in close proximity to an area with adequate public services that will not significantly affect coastal resources.	Section 30250 requires new commercial development to be located in areas able to accommodate it. The Proposed Project is located in a previously developed area. The project site has historically operated as industrial use with adequate public facilities. The project would not require expansion of public services to support anticipated increased demands. The availability of these services and needed expansions are discussed in *Sections 5.13, Public Services*, and *5.16, Public Utilities* and Service Systems, of this EIR. In all cases, project impacts on public services and public utilities and service systems would be less than significant.	Consistent with mitigation
30251	Scenic and visual qualities of coastal areas shall be considered and protected. To protect such resources, development shall minimize the alteration of natural landforms, be visually compatible with the character of surrounding areas, and, where feasible, restore and enhance visual quality in visually degraded areas.	Section 30251 requires that the proposed new structures be sited and designed to protect views to and along the shoreline. The Proposed Project and Specific Plan design standards provide landscape and signage policies to ensure scenic and visual corridors are protected.	Consistent with mitigation
30252	Provides that the location and amount of new development should maintain and enhance public access to the coast by: 1) Facilitating public access to the coast by the provision or extension of transit 2) Minimizing the use of coastal access roads for commercial facilities 3) Providing non-automobile circulation	Existing connectivity is reinforced and strengthened in the Specific Plan by incorporating pedestrian, bicycle and vehicular connections to surrounding districts, trails, bicycle infrastructure and transit services. Mobility is supported through internal drives, paseos, and multi-use paths. The surrounding area is rich with transit services, including the San Diego Trolley Blue Line, with stops at E Street and H Street.	Consistent

Table 5.10-2. Local Coastal Program Consistency Analysis

Relevant Coastal Act Sections	Policy (paraphrased, as appropriate)	Analysis	Consistency
	4) Providing adequate parking or alternative public transportation; auto internal circulation 5) Ensuring the potential for public transit for high-intensity uses 6) Ensuring that new development will not overload nearby coastal recreation areas.	In order to minimize the use of coastal access roads for commercial facilities, G Street would primarily serve as a service road providing "back-of-house" access to the proposed uses on site, while also serving as an access to many public utility corridors and an SDG&E substation. All trucking activities occurring on/within Planning Area B-1 would utilize G Street exclusively. The Specific Plan calls for pedestrian paths around the perimeter of all planning areas, between PA-B1 and PA-B2, and connecting to PA-A. A pedestrian and bicycle path extension of the Bayshore Bikeway will cross the Specific Plan area between PA-A and PA-B1 and B2. The Specific Plan proposes a new multi-use path that would run along a portion of the SDG&E and Rail easement to implement a portion of the Bayshore Bikeway extension from G Street to H Street. The remainder of the easement will serve as parking, landscape, and a "green connection" through the development. Additionally, multi-use paths within the plan area would connect the SDG&E and rail easement with Marina Parkway and H Street with G Street.	
30253	New development shall: ▪ Minimize flood hazards, fire, and seismic hazards ▪ Ensure structural stability and not create or significantly contribute to erosion ▪ Be consistent with San Diego Air Pollution Control District (APCD) requirements ▪ Minimize energy consumption and vehicle miles traveled ▪ Protect special communities and neighborhoods that are popular visitor destination points for recreational users	Geologic and seismic issues are described in Section 5.6, Geology and Soils, of this EIR. All structures would be built in conformance with applicable building and fire codes to minimize damage from seismic events or fire. Flood hazards are analyzed in Section 5.9, Hydrology and Water Quality. As described in Section 5.9 Hydrology and Water Quality, the project is designed to minimize erosion through development of stormwater BMPs. Air quality is described in Section 5.2, Air Quality, of the EIR. The Proposed Project conforms to all requirements of Air Pollution Control District.	Consistent

Table 5.10-2. Local Coastal Program Consistency Analysis

Relevant Coastal Act Sections	Policy (paraphrased, as appropriate)	Analysis	Consistency
		Implementation of the proposed project would not increase the demand for energy beyond the City's available supply. A complete inventory of energy conservation measures is identified in Section 5.5, Energy, of the EIR. Additionally, there are VMT reduction features included in the Transportation section of the EIR.	

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5.11 Noise

This section describes the existing noise conditions at the project site, identifies associated regulatory requirements, evaluates potential noise impacts as a result of construction and operation, and identifies mitigation measures related to implementation of the proposed project. The discussion in this section is based on the Noise Technical Report prepared for the project by Dudek in 2024. The complete report is provided in Appendix J of this EIR.

5.11.1 Existing Conditions

Fundamentals of Noise and Vibration

Sound, Noise, and Acoustics

Sound is actually a process that consists of three components: the sound source, sound path, and sound receptor. All three components must be present for sound to exist. Without a source to produce sound, there is no sound. Similarly, without a medium to transmit sound pressure waves, there is no sound. Finally, sound must be received; a hearing organ, sensor, or object must be present to perceive, register, or be affected by sound or noise. In most situations, there are many different sound sources, paths, and receptors rather than just one of each. Acoustics is the field of science that deals with the production, propagation, reception, effects, and control of sound. Noise is defined as sound that is loud, unpleasant, unexpected, or undesired.

Sound Pressure Levels and Decibels

The amplitude of a sound wave determines its loudness. Loudness of sound increases with increasing amplitude. Sound pressure amplitude is measured in units of micronewtons per square meter, also called micropascals. One micropascal is approximately one-hundred billionth (0.00000000001) of normal atmospheric pressure. The pressure of a very loud sound may be 200 million micropascals, or 10 million times the pressure of the weakest audible sound. Because expressing sound levels in terms of micropascals would be very cumbersome and the sensitivity of human hearing to changes in micropascals is rather coarse (e.g., a doubling of micropascals is just audible to most people), sound pressure level in logarithmic units is used instead to describe the ratio of actual sound pressure to a reference pressure squared. These units are called Bels. To provide a finer resolution, a Bel is subdivided into 10 decibels (dB).

A-Weighted Sound Level

Sound pressure level alone is not a reliable indicator of loudness. The frequency, or pitch, of a sound also has a substantial effect on how humans will respond. Although the intensity (energy per unit area) of the sound is a purely physical quantity, the loudness, or human response, is determined by the characteristics of the human ear.

Human hearing is limited not only in the range of audible frequencies, but also in the way it perceives the sound in that range. In general, the healthy human ear is most sensitive to sounds between 1,000 and 5,000 hertz, and it perceives a sound within that range as more intense than a sound of higher or lower frequency with the same magnitude. To approximate the frequency response of the human ear, a series of sound level adjustments is usually applied to the sound measured by a sound level meter. The adjustments (referred to as a weighting network) are frequency-dependent.

The A-scale weighting network approximates the frequency response of the average young ear when listening to ordinary sounds. When people make judgments about the relative loudness or annoyance of a sound, their judgments correlate well with the A-scale sound levels of those sounds. Other weighting networks have been devised to address high noise levels or other special situations (e.g., B-scale, C-scale, and D-scale), but these scales are rarely used in conjunction with most environmental noise evaluations. Noise levels are typically reported in terms of A-weighted sound levels. All sound levels discussed in herein are A-weighted decibels (dBA). Examples of typical noise levels for common indoor and outdoor activities are depicted in Table 5.11-1.

Table 5.11-1. Typical Sound Levels in the Environment and Industry

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
—	110	Rock band
Jet fly over at 300 meters (1,000 feet)	100	—
Gas lawn mower at 1 meter (3 feet)	90	—
Diesel truck at 15 meters (50 feet), at 80 kilometers per hour (50 miles per hour)	80	Food blender at 1 meter (3 feet); garbage disposal at 1 meter (3 feet)
Noisy urban area, daytime; gas lawn mower at 30 meters (100 feet)	70	Vacuum cleaner at 3 meters (10 feet)
Commercial area; heavy traffic at 90 meters (300 feet)	60	Normal speech at 1 meter (3 feet)
Quiet urban, daytime	50	Large business office; dishwasher next room
Quiet urban, nighttime	40	Theater; large conference room (background)
Quiet suburban, nighttime	30	Library
Quiet rural, nighttime	20	Bedroom at night; concert hall (background)
—	10	Broadcast/Recording studio
Lowest threshold of human hearing	0	Lowest threshold of human hearing

Source: Appendix J.

Human Response to Changes in Noise Levels

Under controlled conditions in an acoustics laboratory, the trained, healthy human ear is able to discern changes in sound pressure levels of 1 dBA when exposed to steady, single-frequency signals in the mid-frequency range. Outside such controlled conditions, the trained ear can detect changes of 2 dBA in normal environmental noise. It is widely accepted that the average healthy ear, however, can barely perceive noise level changes of 3 dBA. A change of 5 dBA is readily perceptible, and a change of 10 dBA is perceived as twice (if a gain) or half (if a loss) as loud. A doubling of sound energy results in a 3 dBA increase in sound, which means that a doubling of sound energy (e.g., doubling the volume of traffic on a road) would result in a barely perceptible change in sound level.

Noise Descriptors

Additional units of measure have been developed to evaluate the long-term characteristics of sound. The energy-equivalent sound level (L_{eq}) is also referred to as the time-average sound level. It is the equivalent steady-state or constant sound level that in a stated period of time would contain the same acoustical energy as the time-varying

sound level during the same time period. For instance, the 1-hour A-weighted equivalent sound level, $L_{eq}(h)$, is the energy average of the A-weighted sound levels occurring during a 1-hour period.

People are generally more sensitive to and thus potentially more annoyed by noise occurring during the evening and nighttime hours. Hence, another noise descriptor used in community noise assessments—the community noise equivalent level (CNEL)—represents a time-weighted, 24-hour average noise level based on the A-weighted sound level. However, unlike an unmodified 24-hour L_{eq} value, the CNEL descriptor accounts for increased noise sensitivity during the evening (7 p.m. to 10 p.m.) and nighttime (10 p.m. to 7 a.m.) by adding 5 dBA and 10 dBA, respectively, to the average sound levels occurring during these defined hours within a 24-hour period. Whereas CNEL is used mostly in California, the L_{dn} descriptor (day-night average noise level, which is the same as CNEL with the only exception of not including the 5 dBA evening correction) is used more often for environmental noise evaluations for federal projects.

Sound Propagation

Sound propagation (i.e., the traverse of sound from a noise emission source position to a receptor location) is influenced by multiple factors that include geometric spreading, ground absorption, atmospheric effects, and occlusion by natural terrain and/or features of the built environment.

Sound levels attenuate (or diminish) geometrically at a rate of approximately 6 dBA per doubling of distance from an outdoor stationary point-type source due to the spherical spreading of sound energy with increasing distance traveled. The effects of atmospheric conditions such as humidity, temperature, and wind gradients are typically distance-dependent and can also temporarily either increase or decrease sound levels measured or perceived at a receptor location. In general, the greater the distance the receptor is from the source of sound emission, the greater the potential for variation in sound levels at the receptor due to these atmospheric effects. Additional attenuation can result from sound path occlusion and diffraction due to intervention of natural (ridgelines, dense forests, etc.) and built features (such as solid walls, buildings, and other structures).

Ground-borne Vibration Fundamentals

Ground-borne vibration is fluctuating or oscillatory motion transmitted through the ground mass (i.e., soils, clays, and rock strata). The strength of ground-borne vibration attenuates rapidly over distance. Some soil types transmit vibration quite efficiently; other types (primarily sandy soils) do not. Several basic measurement units are commonly used to describe the intensity of ground vibration. The descriptors used by the Federal Transit Administration (FTA) are peak particle velocity (PPV), in units of inches per second (ips), and velocity decibel (VdB) that is based on a root-mean square (RMS) of the vibration signal magnitude. The calculation to determine PPV at a given distance is as follows:

$$PPV_{distance} = PPV_{ref} * (25/D)^{1.5}$$

Where:

$PPV_{distance}$ = the peak particle velocity in inches per second of the equipment adjusted for distance

PPV_{ref} = the reference vibration level in inches per second at 25 feet

D = the distance from the equipment to the receptor

5.11.1.1 Regulatory Framework

Federal

Federal Transit Administration

In its Transit Noise and Vibration Impact Assessment guidance manual, the FTA recommends a daytime construction noise level threshold of 80 dBA L_{eq} over an 8-hour period (FTA 2018) when detailed construction noise assessments are performed to evaluate potential impacts to community residences surrounding a project. Although this FTA guidance is not a regulation, it can serve as a quantified standard in the absence of such noise limits at the state and local jurisdictional levels.

Federal Interagency Committee on Noise

Some guidance regarding the determination of a substantial permanent increase in ambient noise levels in the project vicinity above existing levels is provided by the 1992 findings of the Federal Interagency Committee on Noise (FICON 1992), which assessed the annoyance effects of changes in ambient noise levels resulting from aircraft operations. The FICON recommendations are based upon studies that relate aircraft and traffic noise levels to the percentage of persons highly annoyed by the noise. Annoyance is a qualitative measure of the adverse reaction of people to noise that generates speech interference, sleep disturbance, or interference with the desire for a tranquil environment.

The rationale for the FICON recommendations is that it is possible to consistently describe the annoyance of people exposed to transportation noise in terms of L_{dn}. The changes in noise exposure that are shown below are expected to result in equal changes in annoyance at sensitive land uses. Although the FICON recommendations were specifically developed to address aircraft noise impacts, they are used in this analysis to define a substantial increase in community noise levels related to all transportation noise sources and permanent non-transportation noise sources.

- Outdoor ambient sound level without the project is less than 60 dBA L_{dn}, then a project-attributed increase of 5 dBA or more would be considered significant;
- Outdoor ambient sound level without the project is between 60 and 65 dBA L_{dn}, project-attributed increase of 3 dBA or more would be considered significant; and
- Outdoor ambient sound level without the project is greater than 65 dBA L_{dn}, then project-attributed increase of 2 dBA or more would be considered significant..

State

California Code of Regulations, Title 24

Title 24 of the California Code of Regulations sets standards that new development in California must meet. According to Title 24, interior noise levels are not to exceed 45 A-weighted decibel Community Noise Equivalent Level (dBA CNEL) in any habitable room (ICC 2019).

California Department of Health Services Guidelines

The California Department of Health Services has developed guidelines of community noise acceptability for use by local agencies (OPR 2017). Selected relevant levels are listed here:

- Below 60 dBA CNEL: normally acceptable for low-density residential use
- 50 to 70 dBA: conditionally acceptable for low-density residential use
- Below 65 dBA CNEL: normally acceptable for high-density residential use and transient lodging
- 60 to 70 dBA CNEL: conditionally acceptable for high-density residential, transient lodging, churches, educational, and medical facilities

The normally acceptable exterior noise level for high-density residential use is up to 65 dBA CNEL. Additionally, this exterior noise level limit is consistent with the City of Chula Vista General Plan Noise Element, which considers multi-family units to be noise-sensitive land uses (City of Chula Vista 2005).

California Department of Transportation

In its Transportation and Construction Vibration Guidance Manual (Caltrans 2020), the California Department of Transportation (Caltrans) recommends 0.5 ips PPV as a threshold for the avoidance of structural damage to typical newer residential buildings exposed to continuous or frequent intermittent sources of ground-borne vibration. For transient vibration events, such as blasting, the damage risk threshold would be 1.0 ips PPV (Caltrans 2020) at the same type of newer residential structures. For older structures, these guidance thresholds would be more stringent: 0.3 ips PPV for continuous/intermittent vibration sources, and 0.5 ips PPV for transient vibration events. With respect to human annoyance, Caltrans guidance indicates that building occupants exposed to continuous ground-borne vibration in the range of 0.2-0.6 ips PPV would find it “unpleasant or “annoying” and thus a likely significant impact. Although these Caltrans guidance thresholds are not regulations, they can serve as quantified standards in the absence of such limits at the local jurisdictional level.

Local

City of Chula Vista Noise Level Compatibility Standards

The City of Chula Vista Noise Ordinance (Chula Vista Municipal Code [CVMC] Section 19.68) (City of Chula Vista 2022) contains regulations restricting land use related noise-generating activities and operations, so as to avoid noise nuisance in the community. Section 19.68.030 of the CVMC establishes the maximum allowable exterior noise limits, based upon the classification of the receiving land use. These standards typically apply to stationary sources such as noise from mechanical equipment (including mechanical ventilation and air conditioning noise, pool pump noise, etc.) or event noise, as opposed to traffic noise. For instance, a school, commercial enterprise, or industrial operation must not generate noise that exceeds a certain specified noise level at any property boundary where an adjacent residential use exists. The property-line noise standards are presented in Table 5.11-2.

Table 5.11-2. City of Chula Vista Exterior Property-Line Noise Limits

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

Source: City of Chula Vista Municipal Code Section 19.68.030, Table III (2022)
Note: dBA = A-weighted decibels

Title 17 of the CVMC (Environmental Quality), Chapter 24, addresses managing noisy and disorderly conduct. Section 17.24.040.C.8 specifically addresses restrictions against generation of construction noise in overnight periods. The use of any tools, power machinery, or equipment, or the conduct of construction and building work in residential zones so as to cause noises disturbing to the peace, comfort, and quiet enjoyment of property of any person residing or working in the vicinity, shall be prohibited between the hours of 10:00 p.m. and 7:00 a.m., Monday–Friday, and between the hours of 10:00 p.m. and 8:00 a.m., Saturday and Sunday, except when the work is necessary for emergency repairs required for the health and safety of any member of the community (City of Chula Vista 2022).

Although the City does not set specific numerical limits for noise associated with temporary construction activities, it can be perceived as a nuisance; thus, the City restricts the times of day when construction may occur (7:00 a.m.–10:00 p.m., Monday–Friday, and 8:00 a.m.–10:00 p.m., Saturday and Sunday).

Transportation-Related Noise Standards

The City's Noise Element establishes a policy for exterior sensitive areas to be protected from high traffic noise levels. The Noise Element sets 65 dBA CNEL for exterior noise levels and 45 dBA CNEL for interior noise levels as the "normally acceptable" level.

5.11.1.2 Existing Setting

Sensitive Receptors

Noise- and vibration-sensitive land uses are typically considered locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Residences, schools, and hospitals are usual examples, with others depending on what the local jurisdiction may have defined or established. Based on context from the City's Noise Ordinance and General Plan Noise Element, sensitive receptors include residences, schools, hospitals, hotels and motels, places of worship, and open space/recreation uses.

Future planned hotel land uses currently under construction approximately 130 feet to the west are the nearest noise-sensitive receptors in the vicinity of the Project site. Other sensitive receptors exist further to the south of the Project site as well as east of I-5, where the noise environment is dominated by traffic noise. These existing sensitive

receptors represent the nearest land uses with the potential, although unlikely, to be impacted by construction and operation of the Project, including noise levels associated with the addition of Project-related traffic on the local roadway network.

Other non-sensitive land uses adjacent to the project site include commercial and industrial land uses and vacant properties. The Project site itself is currently zoned I-G and contains industrial land uses.

Noise Measurements

A sound pressure level (SPL) measurement survey was conducted at five representative positions in the vicinity of the Project site on September 6, 2023, and September 7, 2023, to characterize the existing outdoor ambient noise levels. The noise measurement locations are shown in Figure 5.11-1, Project Site and Noise Measurement Locations.

Table 5.11-3 provides a summary of the noise measurement results as well as the location, date, and time that an individual noise level measurement was performed. As shown in Table 5.11-3, the short-term (15-minute duration) measured L_{eq} noise levels ranged from 65.6 dBA at ST1 to 75.2 dBA at ST3, while long-term (over 24 hours) measured noise levels averaged to 73.5 dBA.

The short-term measurements were conducted by an attending Dudek investigator with a SoftdB "Piccolo" model sound level meter equipped with a windscreen-protected, 0.5-inch diameter pre-polarized condenser microphone with pre-amplifier. The sound level meter meets the current American National Standards Institute (ANSI) standard for a Type 2 (General Use) sound level meter.

The unattended long-term SPL monitor deployed and retrieved by the Dudek investigator was a SoftdB "Piccolo" model sound level meter equipped with a windscreen-protected, 0.5-inch diameter pre-polarized condenser microphone with pre-amplifier. The sound level meter meets the current American National Standards Institute (ANSI) standard for a Type 2 (General Use) sound level meter.

The accuracy of both sound level meters was verified using a field calibrator before and after the measurements, and the measurements were conducted with the microphone positioned approximately five feet above the ground. Appendix J provides sample digital photographs of the field noise level survey locations, followed by Dudek investigator field notes.

Table 5.11-3. Measured Baseline Outdoor Ambient Noise Levels

Site	Location (and investigator observed/perceived sounds)	Date	Time	L_{eq} (dBA)	L_{max} (dBA)	L_{min} (dBA)
ST1	Southwest corner of Sandpiper Bkwy. And Marina Pkwy. (construction at nearby hotel, distant aircraft, conversations, yelling, distant traffic, military helicopter flyovers, construction traffic)	9/6/23	1: 21 PM to 1:36 PM	65.6	78.3	55.8
ST2	Northwest corner of the I-5 Southbound offramp to H St. (traffic, distant aircraft, distant industrial, nearby construction)	9/6/23	1:54 PM to 2:09 PM	68.6	78.2	63.8
ST3	West of Bay Blvd., between G St. and H St. (traffic, distant aircraft, distant construction)	9/6/23	2:15 PM to 2:30 PM	75.2	83.3	70.9

Table 5.11-3. Measured Baseline Outdoor Ambient Noise Levels

Site	Location (and investigator observed/perceived sounds)	Date	Time	L_{eq} (dBA)	L_{max} (dBA)	L_{min} (dBA)
ST4	Northwest corner of G St. and Bay Blvd. (traffic, construction traffic)	9/6/23	2:33 PM to 2:48 PM	73.7	83.3	69.2
LT1	West of Bay Blvd., between G St. and H St. (traffic, distant aircraft, distant construction)	9/6/23 to 9/7/23	1:05 PM to 1:05 PM	73.5	101.9	52.0

Source: Appendix J.
Notes: L_{eq} = equivalent continuous sound level (time-averaged sound level); dBA = A-weighted decibels; L_{max} = maximum sound level during the measurement interval; L_{min} = minimum sound level during the measurement interval. ST = short-term measurement location. LT = long-term measurement location. See Figure 5.11-1 for measurement locations.

5.11.2 Thresholds of Significance

The significance criteria used to evaluate the project impacts related to noise are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to noise would occur if the project would:

1. Result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
2. Result in generation of excessive groundborne vibration or groundborne noise levels.
3. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels.

In light of these above significance criteria, this analysis uses the following standards to evaluate potential noise and vibration impacts.

- **Construction noise** –The proximity of planned hotel land uses to the west of the project suggests that source-to-receptor distances are a minimum of approximately 130 feet. Additionally, most construction equipment and vehicles on a project site do not operate continuously. Therefore, consistent with the FTA guidance mentioned in Section 5.11.1.1 (Regulatory Framework), this analysis will use 80 dBA L_{eq} over an 8-hour period as the construction noise impact criterion during daytime hours (7:00 a.m. to 7:00 p.m.). Further, it should be noted that there are no residential uses or sensitive receptors adjacent to the site.
- **Off-site project-attributed transportation noise** – For purposes of this analysis, a direct roadway noise impact would be considered significant if increases in roadway traffic noise levels attributed to the proposed project were greater than 3 dBA CNEL at an existing noise-sensitive land use.
- **Off-site project-attributed stationary noise** – For purposes of this analysis, a noise impact would be considered significant if noise from typical operation of heating, ventilation, and air conditioning (HVAC), other electro-mechanical systems, and loading docks associated with the proposed project exceeded 50 dBA L_{eq} at the property line of the nearby hotel during nighttime hours. Note that these are the City's thresholds for the multi-family residential land uses that characterize the sensitive receptors adjacent to the proposed project site. Although the nearby future hotel land uses 130 feet to the west of the project

site are not considered to be multi-family land uses, the multi-family land use threshold was used in absence of a City-provided threshold.

- Construction vibration – Guidance from Caltrans indicates that a vibration velocity level of 0.2 ips PPV received at a structure would be considered annoying by occupants within (Caltrans 2013). As for the receiving structure itself, aforementioned Caltrans guidance from Section 5.11.1.1 recommends that a vibration level of 0.3 ips PPV would represent the threshold for building damage risk.

For purposes of disclosure, since the current CEQA noise criteria listed above do not consider it, this analysis also evaluates compatibility of on-site noise exposure levels (e.g., from roadway traffic) with the City of Chula Vista exterior and interior noise standards of 65 dBA CNEL and 45 dBA CNEL, respectively

5.11.3 Impacts

Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Short-Term Construction

Construction noise and vibration are temporary phenomena, with emission levels varying from hour to hour and day to day, depending on the equipment in use, the operations performed, and the distance between the source and receptor. Equipment that would be in use during construction would include, in part, graders, backhoes, rubber-tired dozers, loaders, cranes, forklifts, pavers, rollers, and air compressors. The typical maximum noise levels at a distance of 50 feet from various pieces of construction equipment and activities anticipated for use on the proposed project site are presented in Table 5.11-4. Note that the equipment noise levels presented in Table 5.11-4 are maximum noise levels. Usually, construction equipment operates in alternating cycles of full power and low power, producing average noise levels over time that are less than the maximum noise level. The average sound level of construction activity also depends on the amount of time that the equipment operates and the intensity of construction activities during that time.

Table 5.11-4. Typical Construction Equipment Maximum Noise Levels

Equipment Type	Typical Equipment (L_{max}, dBA at 50 Feet)
All Other Equipment > 5 HP	85
Backhoe	78
Compressor (air)	78
Concrete Saw	90
Crane	81
Dozer	82
Excavator	81
Flat Bed Truck	74
Front End Loader	79
Generator	72
Grader	85
Man Lift	75
Paver	77

Table 5.11-4. Typical Construction Equipment Maximum Noise Levels

Equipment Type	Typical Equipment (L_{max}, dBA at 50 Feet)
Roller	80
Scraper	84
Welder / Torch	73

Source: Appendix J.
Note: L_{max} = maximum sound level; dBA = A-weighted decibels.

Aggregate noise emission from proposed project construction activities, broken down by sequential phase, was predicted at the nearest existing noise-sensitive receptor boundary (the hotel under construction to the west of the project site) to the nearest position of the construction site boundary for each planning area. In this studied scenario, because of the equipment location uncertainty, all the equipment for a construction phase is assumed to operate at the planning area construction site boundary and would therefore be considered a worst-case construction noise scenario. Table 5.11-5 summarizes these distances to the apparent closest noise-sensitive receptor (the future hotel land use approximately 130 feet to the west of the project site) for each of the four sequential construction phases at the nearest planning area site boundary. At each planning area site boundary, this analysis assumes that all equipment of each listed type per phase will be involved in the construction activity for up to the full 8-hour period.

Table 5.11-5. Estimated Distances between Construction Activities and the Nearest Noise-sensitive Receptors

Construction Phase (and Equipment Types Involved)	Distance from Nearest Receptor Boundary to PA-A Site Boundary (Feet)	Distance from Nearest Receptor Boundary to PA-B1 Site Boundary (Feet)	Distance from Nearest Receptor Boundary to PA-B2 Site Boundary (Feet)
Grading (excavator, grader, dozer, backhoe)	1,400	130	130
Building construction (crane, man-lift, generator, backhoe, welder)	1,400	130	130
Paving (paver, roller, other equipment)	1,400	130	130
Architectural Coating (air compressor)	1,400	130	130

Source: Google Earth 2023

A Microsoft Excel–based noise prediction model emulating and using reference data from the Federal Highway Administration Roadway Construction Noise Model (RCNM) (FHWA 2008) was used to estimate construction noise levels at the nearest occupied noise-sensitive land use. Although the RCNM was funded and promulgated by the Federal Highway Administration, it is often used for non-roadway projects, because the same types of construction equipment used for roadway projects are often used for other types of construction. Input variables for the predictive modeling consist of the equipment type and number of each (e.g., two graders, a loader, a tractor), the duty cycle for each piece of equipment (e.g., percentage of time within a specific time period, such as an hour, when the equipment is expected to operate at full power or capacity and thus make noise at a level comparable to what is presented in Table 5.11-4), and the distance from the noise-sensitive receptor. The predictive model also

considers how many hours that equipment may be on-site and operating (or idling) within an established work shift. Conservatively, no topographical or structural shielding was assumed in the modeling. The RCNM has default duty-cycle values for the various pieces of equipment, which were derived from an extensive study of typical construction activity patterns. Those default duty-cycle values were used for this noise analysis, which is detailed in Appendix J, and produced the predicted results displayed in Tables 5.11-6 through 5.11-8.

Table 5.11-6. Predicted Construction Noise Levels per Activity Phase

Construction Phase (and Equipment Types Involved)	8-Hour L_{eq} at Nearest Receptor Boundary to PA-A Site Boundary (dBA)	8-Hour L_{eq} at Nearest Receptor Boundary to PA-B1 Site Boundary (dBA)	8-Hour L_{eq} at Nearest Receptor Boundary to PA-B2 Site Boundary (dBA)
Site Preparation (dozer, backhoe)	49.6	73.3	73.3
Grading[1] (excavator, grader, dozer, backhoe)	52.6	76.0	76.0
Building construction (crane, man-lift, generator, backhoe, welder)	45.7	69.4	69.4
Paving (paver, roller, other equipment)	49.6	73.7	73.7
Architectural Coating (air compressor)	37.8	61.4	61.4

Source: Appendix J.
Notes: Leq = equivalent noise level; dBA = A-weighted decibels.
[1] Noise levels presented in Table 5.11-6 are from the Initial Site Development Phase. See Appendix J for predicted Grading levels during Planning Area construction, which are predicted to be lower than the presented levels in Table 5.11-6 and were thus omitted.

As presented in Table 5.11-6, the highest estimated construction noise levels are predicted to stay at or below 76 dBA L_{eq} over an 8-hour period at the nearest existing noise-sensitive land use (the hotel under construction approximately 130 feet to the west of the project site) when grading activities take place near the project site boundary. Further, it should be noted that there are no residential uses or sensitive receptors adjacent to the site. As a result, short-term construction noise is predicted to be well below the FTA guidance of 80 dBA L_{eq} over an 8-hour period, and therefore is **less than significant**.

Best Practices for Limiting Construction Noise

Despite the construction noise analysis above showing that the impact to noise-sensitive receptors would be less than significant, Chapter 4, Project Description provides list of best practices (PDF-Construction Noise) for limiting construction noise that would be implemented by the contractor.

Off-Site Construction Activities

The project would result in local, short-term increases in roadway noise as a result of construction traffic. Based on information developed as part of the project's air quality analysis, project-related traffic would include workers commuting to and from the project site as well as vendor and haul trucks bringing or removing materials. The highest number of average daily worker trips would be 292 one-way trips, occurring during the building construction phase of Planning Area B-2. The highest number of average daily vendor truck trips would be 150 one-way trips,

also occurring during the building construction phase of Planning Area B-2. The highest number of daily haul truck trips is yet to be determined.

Based upon available data from the project's Transportation Technical Memorandum, H Street in the project vicinity carries approximately 12,070 daily trips (peak hour multiplied by a k-factor of 10) in the project vicinity. Comparing the maximum number of daily construction-related trips (292 worker trips, 150 vendor trips and to-be-determined haul truck trips) to the average daily traffic volume, the additional vehicle trips would amount to an increase of approximately 4%[1]. Based upon the fundamentals of acoustics, a doubling (i.e., a 100% increase) would be needed to result in a 3-dB increase in noise levels, which is the level corresponding to an audible change to the typical human listener. Additionally, although the number of daily haul trucks is yet to be determined, it is not anticipated that the number of haul trucks would double the number of trips on nearby roadways. Therefore, traffic related to construction activities would not result in a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Impacts from project-related construction traffic noise would be **less than significant.**

Long-Term Operational

Off-Site Traffic Noise Exposure

The project is expected to generate a subtotal of 7,520 average daily trips to the roadway system, as shown in Appendix K. During the afternoon (PM) peak-hour (the highest of the AM and PM peak hours), approximately 903 passenger car equivalent vehicles for Planning Area B-1 analysis and 767 passenger car equivalent vehicles for Planning Areas A/B-2 analysis are estimated to enter or exit the project site. Utilizing this information as well as additional traffic data provided in Appendix J, the FHWA's Highway Traffic Noise Prediction Model RD-77-108 was used to estimate potential noise impacts at adjacent noise-sensitive uses. Information used in the model included Average Daily Traffic (ADT), posted traffic speeds, truck mix percentage, and day/evening/night mix percentage. Consistent with Caltrans guidance (Caltrans 2013), this analysis assumes 80% of the ADT occurs during daytime hours (7:00 a.m. to 7:00 p.m.), 5% during the evening (7:00 p.m. to 10:00 p.m.), and 15% during the nighttime (10:00 p.m. to 7:00 a.m.).

The future modeled traffic speed was assumed to be the anticipated speed limit for the studied future roads, which is 35 miles per hour (mph) for Bay Boulevard, F Street, G Street, H Street, and Marina Parkway. The truck percentages used in the noise model were 2.0% medium trucks and 1.0% heavy trucks. This truck mix is based on vehicle surveys conducted for a number of similar roads in San Diego County that allow truck traffic.

The change in roadway noise levels was predicted for opening year 2026 and opening year 2026 plus project. Traffic noise levels were calculated for roadway segments bounded by intersections within the project area and are listed as follows:

- Bay Boulevard – From F Street to G Street;
- Bay Boulevard – From G Street to H Street;
- Bay Boulevard – From H Street to J Street;

[1] It is noted that the estimated percentage of trucks in the project's construction traffic mix is greater than a typical urban arterial, which may result in a greater temporary change than the 4% increase would represent; however, the project site is located in an industrial/commercial area with high percentages of trucks as well. Thus, the estimated temporary increase would be less than 3 dB as stated, and less than significant.

- F Street – From Bay Boulevard to Woodlawn Avenue;
- G Street – From Marina Parkway to Bay Boulevard;
- H Street – From Marina Parkway Bay Boulevard;
- H Street – From Bay Boulevard to I-5 Southbound Ramps;
- H Street – From I-5 Southbound Ramps to I-5 Northbound Ramps;
- H Street – From I-5 Northbound Ramps to Woodlawn Avenue;
- Marina Parkway – From G Street to H Street;
- Marina Parkway – From H Street to Street C;
- Marina Parkway – From Street C to Marina Way;
- Marina Parkway – From Marina Way to Street A; and
- Marina Parkway – From Street A to Bay Boulevard.

Based upon the FICON thresholds presented above, an increase of less than 5 dBA when the ambient sound level is less than 60 dBA L_{dn}/CNEL, less than 3 dBA when the ambient sound level is between 60 and 65 dBA L_{dn}/CNEL, or less than 2 dBA when the ambient sound level is greater than 65 dBA L_{dn}/CNEL would not be substantial. Table 5.11-7 shows that the highest predicted change in traffic noise level (G Street – From Marina Parkway to Bay Boulevard) combined with the roadways surrounding the immediate project site are predicted to experience a traffic noise level of 64.7 dBA at 50 feet for the opening year 2026 with project condition and a predicted increase of approximately 4.8 dBA due to the project contribution, which is less than 5 dBA over the predicted "without project" noise level of 59.9 dBA. Therefore, potential impacts at existing off-site noise-sensitive land uses along roadway segments identified in Table 5.11-7 and with respect to project-generated changes to future traffic noise would be **less than significant**.

Table 5.11-7. Predicted Traffic Noise Levels

Modeled Roadway Segment	From	To	Opening Year 2026 (dBA CNEL)	Opening Year 2026 Plus Project (dBA CNEL)	Delta (dBA)
Bay Boulevard	F Street	G Street	64.1	64.6	0.5
Bay Boulevard	G Street	H Street	64.3	66.3	2.0
Bay Boulevard	H Street	J Street	61.5	64.0	2.5
F Street	Bay Boulevard	Woodlawn Avenue	63.0	63.4	0.3
G Street	Marina Parkway	Bay Boulevard	59.9	64.7	4.8
H Street	Marina Parkway	Bay Boulevard	65.7	66.2	0.5
H Street	Bay Boulevard	I-5SB Ramps	66.8	68.0	1.2
H Street	I-58SB Ramps	I-5NB Ramps	66.8	67.6	0.9
H Street	I-58NB Ramps	Woodlawn Avenue	67.9	68.2	0.3
Marina Parkway	G Street	H Street	63.0	63.3	0.3
Marina Parkway	H Street	Street C	62.2	62.8	0.7
Marina Parkway	Street C	Marina Way	64.5	64.5	0.0
Marina Parkway	Marina Way	Street A	64.8	65.2	0.4
Marina Parkway	Street A	Bay Boulevard	66.4	66.7	0.3

Source: Appendix J

Project Sound Sources

On-Site Outdoor Mechanical Equipment

The completion of Planning Area B-1 buildings will add a variety of noise-producing mechanical equipment that include those presented and discussed in the following paragraphs. Most of these noise-producing equipment or sound sources would be considered stationary or limited in mobility to a defined area. Planning Areas A and B-2 are programmed for future portions of the project site. Planning Area A is expected to maintain warehouse uses, which may have similar loading dock and HVAC noise as the analyzed portion for Planning Area B-1. However, land uses adjacent to Planning Areas A and B-2 appear to be industrial land uses or vacant at the present time. Because the expected uses for Planning Areas A and B-2 are similar to the uses for Planning Area B-1 and are generally less noisy than a warehouse use with active loading docks, and because the surrounding land uses are industrial land uses, it is assumed that the noise levels and contours predicted for Planning Area B-1 would be applicable to Planning Areas A and B-2.

Prediction Method and Parameters

The aggregate noise emission from outdoor-exposed sound sources (mechanical equipment) has been predicted with the Datakustik CadnaA sound propagation program. CadnaA is a commercially available software program for the calculation, presentation, assessment, and prediction of environmental noise based on algorithms and reference data per International Organization for Standardization (ISO) Standard 9613-2, "Attenuation of Sound During Propagation Outdoors, Part 2: General Method of Calculation" (ISO 1996). The CadnaA computer software allows one to position sources of sound emission in a simulated three-dimensional (3-D) space having heights and footprints consistent with project architectural plans and elevations. In addition to the above-mentioned sound source inputs and building-block structures that define the 3-D sound propagation model space, the following assumptions and parameters are included in this CadnaA-supported stationary noise source assessment:

- Ground effect acoustical absorption coefficient equal to 0.5, which intends to represent an average or blending of ground covers that are characterized largely by hard reflective pavements and existing building surfaces across the project site and the surroundings;
- Reflection order of 1, which allows for a single reflection of sound paths on encountered structural surfaces such as the modeled building masses;
- Off-site residential structures and buildings have not been rendered in the model;
- Calm meteorological conditions (i.e., no wind) with 68 degrees Fahrenheit and 50% relative humidity; and
- All of the modeled noise sources are operating concurrently and continuously for a minimum period of 1 hour.

Based on the available plans and other design information, proposed buildings in Planning Area B-1 would be served by roof-mounted air-conditioning equipment that includes outdoor-exposed packaged air-handling units and air-cooled condensers that provide the expected cooling demand (expressed as refrigeration "tonnage") for a building. The following are descriptions of modeled sound sources, with Table 5.11-8 exhibiting modeled sound power level (PWL) data at octave-band center frequency (OBCF) resolution. Detailed information supporting these summary descriptions and quantities appear in Appendix J.

Table 5.11-8. Modeled Sound Power Levels (PWL) for Stationary Sources (HVAC)

Building	Sound Source	Overall L_{eq} (dBA)	A-Weighted dB at Octave Band Center Frequency (OBCF, Hz)								
			32.5	63	125	250	500	1000	2000	4000	8000
1	Air Handling	86	67.5	67.5	79.5	80.5	81.5	78.5	71.5	65.5	60.5
	Air Conditioning	96	68.0	68.0	81.0	85.0	92.0	89.0	87.0	85.0	78.0
2	Air Handling	88	68.6	68.6	80.6	81.6	82.6	79.6	72.6	66.6	61.6
	Air Conditioning	96	68.0	68.0	81.0	85.0	92.0	89.0	87.0	85.0	78.0
3	Air Handling	88	68.8	68.8	80.8	81.8	82.8	79.8	72.8	66.8	61.8
	Air Conditioning	96	68.0	68.0	81.0	85.0	92.0	89.0	87.0	85.0	78.0
4	Air Handling	90	70.8	70.8	82.8	83.8	84.8	81.8	74.8	68.8	63.8
	Air Conditioning	98	74.0	74.0	81.0	88.0	92.0	91.0	91.0	89.0	80.0

Source: Appendix J
Note: Building number and layout can be viewed in Figures 5.11-2 and 5.11-3.

The HVAC reference sound levels were calculated from a combination of inputs that include square footage values for the proposed project's proposed office spaces, project applicant response to data requests, and manufacturer sound power level data. For the analysis of noise from HVAC equipment operation, eight air conditioning units were modeled on the rooves of each project building.

Other Stationary Noise Sources

The proposed project buildings may feature other noise emitters, but their contributions would tend to be sporadic or otherwise occur infrequently and thus be expected to have no greater acoustic contribution to an hourly L_{eq} than the continuous-type HVAC noise studied herein.

Loading Dock Noise Sources

The proposed project buildings also feature loading dock areas for the loading and unloading of heavy trucks. On-site loading dock noise was calculated for a single heavy truck pass by (Salter 2014) and extrapolated based upon the number of heavy trucks entering or exiting the facility during the peak hour. Loading dock data were subsequently entered into the CadnaA model for the prediction of stationary operations noise levels. Detailed information supporting the calculation of peak hour heavy truck trips for the loading dock calculations can be found in Appendix J.

Prediction Results

An operational scenario of the proposed project was modeled that assumes all the HVAC equipment is operating simultaneously for a minimum period of one hour along with peak hour truck movements in the loading dock areas. Figure 5.11-2, Predicted Daytime On-site Operations Noise Contours, displays the predicted noise contours associated with aggregate sound propagation from operating HVAC and peak daytime loading dock sound sources. An additional operational scenario of the proposed project was modeled to predict a hypothetical nighttime scenario, where all the HVAC equipment is operating simultaneously for a minimum period of one hour, but the

peak hour truck movement is reduced to a single truck for each docking area. Figure 5.11-3, Predicted Nighttime On-site Operations Noise Contours, displays the predicted noise contours associated with aggregate sound propagation from operating HVAC and nighttime loading dock sound sources.

Figures 5.11-2 and 5.11-3 illustrate predicted aggregate SPL propagation solely from operation of the proposed project sound sources as described above. The color-coded annular bands of SPL are calculated across a field parallel with and 5 feet above local grade.

Based on the noise level contours appearing in Figures 5.11-2 and 5.11-3, the proposed project Planning Area B-1 is predicted to be up to 45 dBA L_{eq} in the daytime and 42 dBA L_{eq} in the nighttime for a calculated L_{dn} of 49 dBA at the nearby future hotel land use and is therefore expected to be lower than and thus comply with the City's 60 dBA L_{eq} daytime threshold and 50 dBA L_{eq} nighttime threshold for multi-family residential land uses.

Planning Areas A and B-2 are programmed for future portions of the project site. Planning Area A is expected to maintain warehouse uses, which may have similar loading dock and HVAC noise as the analyzed portion for Planning Area B-1. However, land uses adjacent to Planning Areas A and B-2 appear to be industrial land uses or vacant at the present time. Because the expected uses for Planning Areas A and B-2 are similar to the uses for Planning Area B-1 and are generally less noisy than a warehouse use with active loading docks, and because the surrounding land uses are industrial land uses, it is assumed that the noise levels and contours predicted for Planning Area B-1 would be applicable to Planning Areas A and B-2. Thus, noise generated by the programmed Planning Areas A and B-2 are expected to be below the City's 70 dBA L_{eq} threshold for industrial land uses.

Planning Area B-2 may contain a hotel and restaurant, which may have exterior areas subject to lower City thresholds. Further analysis may be necessary to determine on-site impacts from loading dock and HVAC noise sources associated with other areas of the project. However, and as shown in Figure 5.11-2, impacts from Planning Area B-1 are likely due to project building orientation. With additional consideration for Planning Area A building orientation, warehouse and loading dock noise may be reduced at future hotel uses associated with Planning Area B-2. Thus, noise generated by Planning Areas A, B-1, and B-2 are expected to be below the City's 50 dBA L_{eq} nighttime threshold for multi-family residential land uses Note that the multi-family residential land use threshold is applied to this analysis due to an absence of City thresholds for hotel land uses.

Therefore, impacts associated with stationary operations noise would be **less than significant**.

On-site Parking Lot Activity

A comprehensive study of noise levels associated with surface parking lots was published in the Journal of Environmental Engineering and Landscape Management (Baltrënas et al. 2004). The study found that average noise levels for parking lots of similar size during the peak period of use of the parking lot (generally in the morning with arrival of commuters, and in the evening with the departure of commuters), was 47 dBA L_{eq} at 1 meter (3.28 feet) from the outside boundary of the parking lot. The parking areas would function as point sources for noise, which means that noise would attenuate at a rate of 6 dBA with each doubling of distance. Employee parking lots are proposed to be distributed throughout the project site adjacent to the warehouse/office buildings, no closer than 180 feet from the edge of the parking lot to the future hotel to the west. At a distance of 180 feet, parking lot noise levels would not be audible to the human ear at the future hotel receptor locations. The combination of the parking lot noise (~12 dBA L_{eq}) and the loading dock equipment level (45 dBA L_{eq} during the daytime and 42 dBA

L_{eq} during the nighttime at the nearest receptor) would be 45 dBA L_{eq}[2], during the daytime and 42 dBA L_{eq} during the nighttime which is below the applicable limits (i.e., 60 dBA L_{eq} during daytime hours and 50 dBA L_{eq} during nighttime hours for multi-family residential land uses). Note that the multi-family residential land use threshold is applied to this analysis due to an absence of City thresholds for hotel land uses. Therefore, impacts associated with parking lot noise would be **less than significant**.

Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Construction activities may expose persons to excessive ground-borne vibration or ground-borne noise, causing a potentially significant impact. Caltrans has collected ground-borne vibration information related to construction activities (Caltrans 2020). Information from Caltrans indicates that continuous vibrations with a PPV of approximately 0.2 ips is considered annoying. For context, heavier pieces of construction equipment, such as a bulldozer that may be expected on the project site, have peak particle velocities of approximately 0.089 ips or less at a reference distance of 25 feet (DOT 2006).

Ground-borne vibration attenuates rapidly, even over short distances. The attenuation of ground-borne vibration as it propagates from source to receptor through intervening soils and rock strata can be estimated with expressions found in FTA and Caltrans guidance. By way of example, for a bulldozer operating on-site and as close as the northern project boundary (i.e., ~70 feet from the nearest occupied property), the estimated vibration velocity would be 0.018 ips per the equation as follows (FTA 2018):

$$PPV_{rcvr} = PPV_{ref} * (25/D)^{1.5} = 0.018 = 0.089 * (25/70)^{1.5}$$

In the above equation, PPV_{rcvr} is the predicted vibration velocity at the receptor position, PPV_{ref} is the reference value at 25 feet from the vibration source (the bulldozer), and D is the actual horizontal distance to the receptor. Therefore, at this predicted PPV, the impact of vibration-induced annoyance to occupants of nearby existing homes would be less than significant.

Construction vibration, at sufficiently high levels, can also present a building damage risk. However, anticipated construction vibration associated with the proposed project would yield a maximum amplitude of 0.018 ips, which does not surpass the guidance limit of 0.2 to 0.3 ips PPV for preventing damage to residential structures (Caltrans 2020). Because the predicted vibration level at 70 feet is less than this guidance limit and because there are no residential structures adjacent to the project, the risk of vibration damage to nearby structures is considered less than significant.

Once operational, the proposed project would not be expected to feature major producers of ground-borne vibration. Anticipated mechanical systems like heating, ventilation, and air-conditioning units are designed and manufactured to feature rotating (fans, motors) and reciprocating (compressors) components that are well-balanced with isolated vibration within or external to the equipment casings. On this basis, potential vibration impacts due to proposed project operation would be **less than significant**.

[2] Because noise levels are summed in the energy (that is, the logarithmic) domain, a noise level that is 10 decibels or more lower than another noise level becomes negligible, because the sound energy from the higher noise source is completely dominant.

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

There are no private airstrips within the vicinity of the project site. The closest airport to the proposed project site is the Imperial Beach Airport approximately 4 miles south of the project boundary. Therefore, airport noise impacts would be **less than significant.**

5.11.4 Level of Significance Prior to Mitigation

Noise impacts associated with the proposed project would be **less than significant**.

5.11.5 Mitigation Measures

No mitigation measures are required.

5.11.6 Level of Significance After Mitigation

Noise impacts associated with the proposed project would be **less than significant**.



SOURCE: Google 2023; Dudek 2023

DUDEK

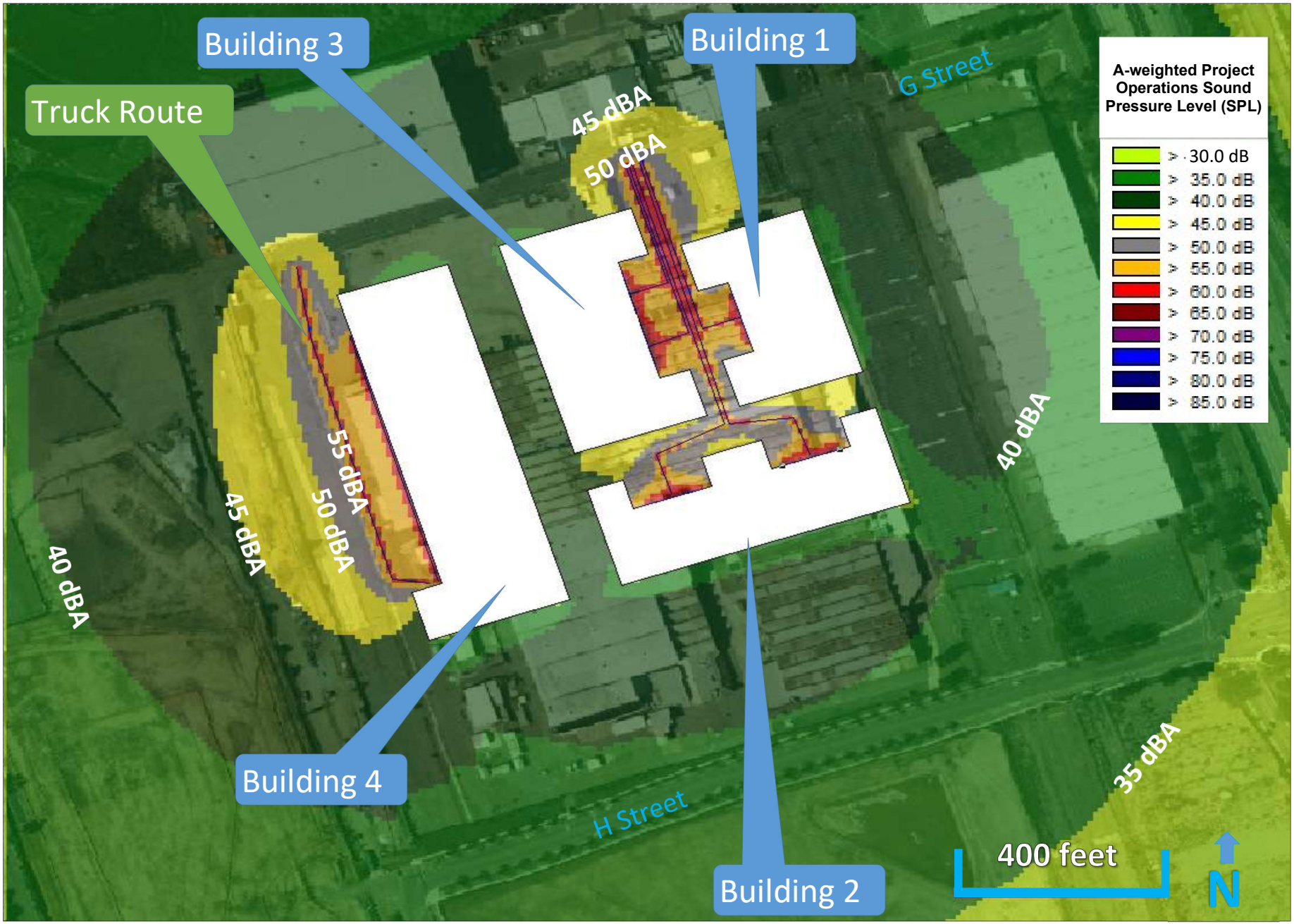
0 225 450 Feet

FIGURE 3

Project Site and Noise Measurement Locations

Rohr Wohl Specific Plan Project

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SOURCE: Microsoft 2023; Dudek 2023

DUDEK

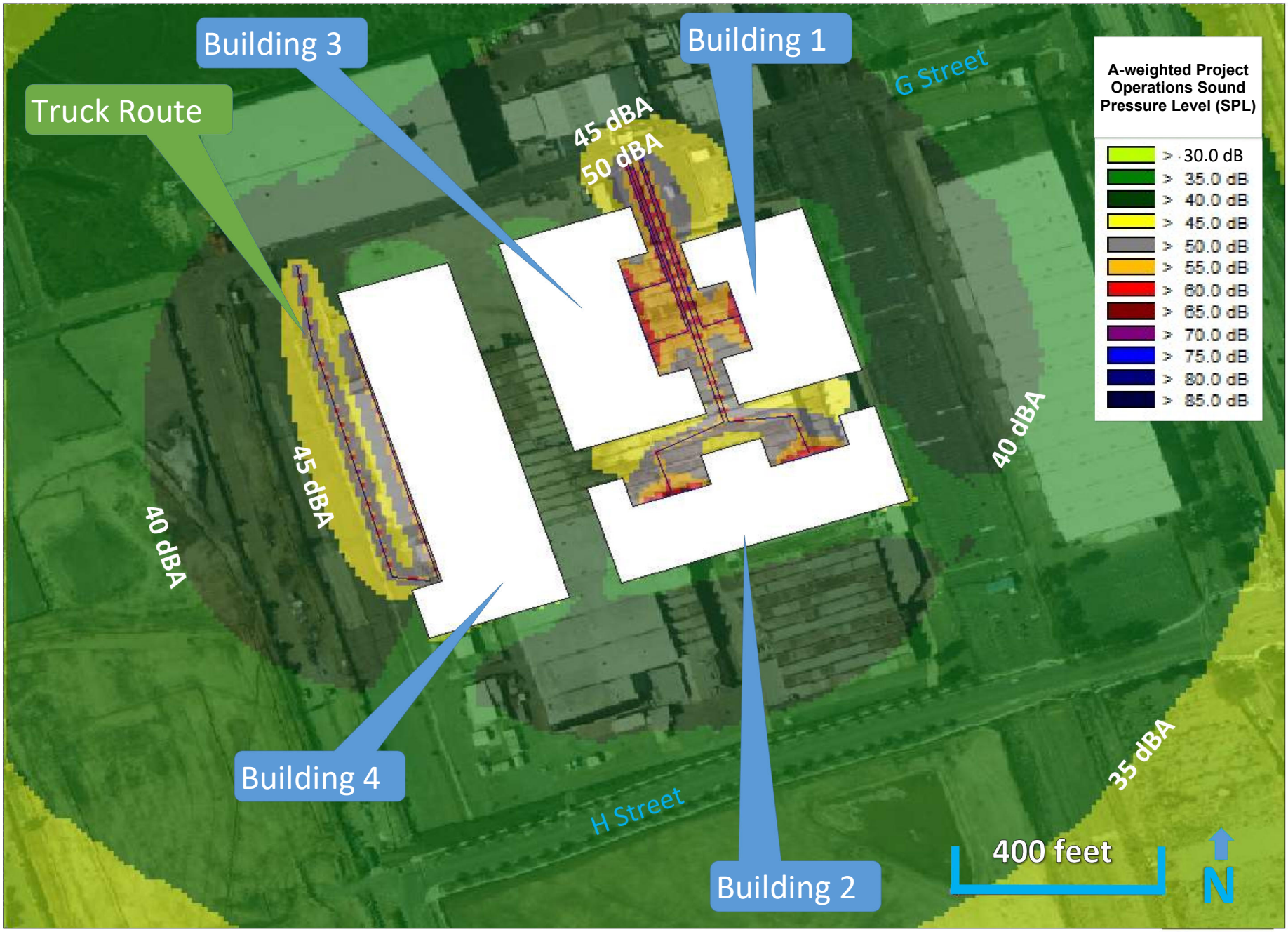
0 119 238 Feet

FIGURE 5.11-2

Predicted Daytime Onsite Operations Noise Contours

Rohr Wohl Specific Plan Project

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SOURCE: Microsoft 2023; Dudek 2023

DUDEK

0 119 238 Feet

FIGURE 5.11-3

Predicted Nighttime Onsite Operations Noise Contours

Rohr Wohl Specific Plan Project

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5.12 Population and Housing

This section describes the existing population and housing conditions of the project site and vicinity, identifies associated regulatory requirements, and evaluates potential impacts related to implementation of the proposed Rohr Wohl Specific Plan Project (proposed project or project), which does not include the development of any residential land uses.

5.12.1 Existing Conditions

5.12.1.1 Regulatory Framework

Federal

No federal regulations or guidelines relating to population and housing apply to the proposed project.

State

California Government Code (Sections 65580–65590)

State law mandates local communities plan for enough housing to meet projected growth in California. Article 10.6 of the California Government Code (Sections 65580–65590) requires each county and city to prepare a housing element as part of its general plan. The housing element is one of seven state-mandated elements that every general plan must contain, and it is required to be updated every 5 to 8 years and must be determined to be legally adequate by the state. The purpose of the housing element is to identify the community's housing needs; state the community's goals and objectives with regards to housing production, rehabilitation, and conservation to meet those needs; and define the policies and programs that the community will implement to achieve the stated goals and objectives.

Regional

San Diego Association of Governments

The San Diego Association of Governments (SANDAG) is a public agency, composed of 18 cities and the County of San Diego, which builds strategic plans guiding the San Diego region in land use, growth, economics, and the environment. SANDAG also provides population and housing estimates for the region that inform regional planning and that are based, in part, on local jurisdictional planning data.

Regional Comprehensive Plan

The SANDAG Regional Comprehensive Plan, adopted in 2004, provides a long-term planning framework for the San Diego Region. The Regional Comprehensive Plan identifies smart growth and sustainable development as important strategies to direct the region's future growth toward compact, mixed-use development in urbanized communities that already have existing and planned infrastructure, and then toward connecting those communities with a variety of transportation choices.

2050 Regional Transportation Plan/Sustainable Communities Strategy

In 2011, SANDAG approved the 2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). This approval marked the first time SANDAG's RTP included an SCS, consistent with Senate Bill 375, the Sustainable Communities and Climate Protection Act of 2008. This RTP/SCS provided a blueprint to improve mobility, preserve open space, and create communities, all with transportation choices to reduce greenhouse gas emissions and meet specific targets set by the California Air Resources Board as required by Senate Bill 375.

2021 Regional Plan

SANDAG is required to update its RTP every 4 years. In December 2021, SANDAG adopted the latest update to its RTP/SCS. SANDAG's 2021 RTP/SCS, known as the 2021 Regional Plan, builds upon SANDAG's 2019 RTP/SCS, known as the 2019 Federal Regional Transportation Plan.

The 2021 Regional Plan updates growth forecasts and is based on the most recent planning assumptions, including adopted land use plans including the City's General Plan and other factors from the cities in the region and the County (SANDAG 2021a). SANDAG's Regional Plan will change in response to the ongoing land use planning of the City and other jurisdictions. For example, the City's General Plan, and other local general plans, may change based on general plan amendments initiated by the jurisdiction or landowner applicants. The general plan amendments may result in increases in development densities by amending the regional category designations or zoning classifications. Accordingly, the latest forecasts from the SANDAG RTP/SCS for future development in the San Diego region, including location, must be coordinated closely with each jurisdiction's ongoing land use planning because plans are not static, as reflected by the need for updates to SANDAG's RTP/SCS every 4 years.

Series 14 Regional Growth Forecast

The SANDAG Series 14 Regional Growth Forecast serves as the foundation for the 2021 Regional Plan and other planning documents across the region (SANDAG 2018). This summary includes an overview of the regional demographic, economic, and housing trends expected over the next 34 years.

6th Cycle Regional Housing Needs Assessment

State law requires that jurisdictions provide their fair share of regional housing needs. The California Department of Housing and Community Development is mandated to determine the statewide housing need. In cooperation with Department of Housing and Community Development, local governments and councils of government are charged with determining the City's or region's existing and projected housing need as a share of the statewide housing need.

5.12.1.2 Existing Population and Housing Setting

The approximately 44.78-acre project site was used for agriculture until 1941, when it was developed as the Rohr Aircraft Facility, which employed thousands of Chula Vista residents for more than 60 years. The site was previously developed with two main industrial buildings and several smaller outbuildings. One of the buildings was approximately 282,004 square feet and was used for research and development, tooling, and warehousing and distribution of aftermarket products until early 2021. The other two larger buildings had a combined square footage of 733,977. There were also 11 smaller outbuildings totaling 32,860 square feet. These buildings were used for manufacturing, warehouse, and distribution operations until approximately 2020. All structures in Planning Areas

B-1 and B-2 have been demolished, all building debris has been hauled off-site to appropriate disposal facilities, and Raytheon Technologies Corporation, of which Rohr is a wholly owned company, is completing soil and groundwater remediation in accordance with San Diego RWQCB CAO R9-2021-0042, which was issued to Rohr in July 2021.The existing building in Planning Area A remains and will not be demolished as part of the CAO or the proposed project.

Population

SANDAG estimates future population, housing, land use, and economic growth throughout San Diego County and in individual cities, including the City of Chula Vista. On May 25, 2018, the Series 14 2050 Regional Growth Forecast was accepted by the SANDAG Board of Directors for planning purposes (SANDAG 2018). This forecast serves as the foundation for San Diego Forward: The Regional Plan and other planning documents across the region. SANDAG projects the region's population will grow by 437,000 people between 2016 and 2050. This forecast is consistent with previous expectations although future growth rates have been reduced due to increased domestic migration out of the region. The growth in population will drive job growth and housing demand within the region, adding nearly 440,000 jobs and more than 280,000 housing units by 2050 (SANDAG 2021b).

The City of Chula Vista is anticipated to have a population of 284,835 by 2025, which comprises approximately 8.2% of the population in the San Diego region. As shown in Table 5.12-1, the SANDAG Series 14 Regional Growth Forecast for 2050 predicts population, housing, and employment for the San Diego Region, as well as for the City of Chula Vista, for 2016 through 2050.

Table 5.12-1. San Diego Region vs. City of Chula Vista Population, Housing, and Employment Forecast

Planning Area	Year 2016	Year 2025	Year 2035	Year 2050	Increase	Percent Change
Population						
City of Chula Vista	265,357	284,835	288,141	323,469	58,112	21.9%
San Diego Region[a]	3,309,510	3,470,848	3,620,348	3,746,073	436,563	13.2%
Housing						
City of Chula Vista	82,794	91,635	95,621	109,474	26,680	32.2%
San Diego Region	1,190,555	1,288,216	1,409,866	1,471,299	280,744	23.6%
Employment						
City of Chula Vista	74,078	83,027	98,701	116,185	42,107	56.8%
San Diego Region	1,646,419	1,761,747	1,921,475	2,086,318	439,899	26.7%

Sources: SANDAG 2021b.
Note:
[a] The San Diego Region includes both incorporated and unincorporated areas of the region.

Housing

According to SANDAG's 2050 Regional Growth Forecast, the City is expected to gain 58,112 new residents and 26,680 new households between 2016 and 2050 (SANDAG 2021b). Furthermore, SANDAG, through its Regional Housing Needs Allocation, estimated that the City would experience a demand for 11,105 housing units through the 2021 and 2029 planning period, of which 4,527 new housing units would be for affordable to low- and very-low-income households and 6,578 new housing units would be for moderate- and above-moderate-income households. The City of Chula Vista anticipates that much of the new construction will result from building out the master-planned communities in the East Planning Area, such as Otay Ranch, infill development, and mixed-use development (SANDAG 2021c).

To encourage the development of adequate housing to meet the needs of low and moderate-income households and to further geographic and community balance, the City's adopted Housing Element provides for a Balanced Communities Policy, requiring 10% affordable housing for low- and moderate-income households within developments of 50 or more residential units.[1,2] This inclusionary housing program will serve as only one component of the City's overall housing strategy and will complement other affordable housing efforts, including preservation of existing assisted housing, development of new assisted housing with public subsidies, first-time homebuyer assistance, and rehabilitation loans for low-income homeowners. The City finds that such an inclusionary housing policy is beneficial to increasing the supply of housing affordable to households of lower and moderate incomes and to meet the City's regional share of housing needs given the demographics of the community and its needs, past housing production performance, and the existing opportunities and constraints as detailed in its Housing Element (City of Chula Vista 2012a).

The City's new General Plan Housing Element was adopted on July 13, 2021, and amended on September 13, 2022. The Housing Element establishes clear goals and objectives to inform future housing decisions for the 2021 to 2029 housing cycle. As part of the Housing Element update, the City must demonstrate there is sufficient capacity to accommodate the number of housing units identified in the Regional Housing Needs Assessment (RHNA). As such, the RHNA allocation was released by SANDAG in November 2019 and helped inform preparation of the 2021 Housing Element. Tables 5.12-2 and 5.12-3 show the past performance RHNA from the 5th Cycle (2013–2020) and the current RHNA allocation for the 6th Cycle (2021–2029), respectively (City of Chula Vista 2020b).

Table 5.12-2. Past Performance RHNA 5th Cycle (2013–2020)

Income Level	RHNA Allocation by Level	Total Units to Date (all years)	Total Remaining RHNA (2019–2021)
Very Low	3,209	91	3,118
Low	2,439	557	1,882
Moderate	2,257	328	1,929

1 Low-income households are households of persons who claim primary residency at the same unit with combined incomes that are greater than 50%, but not more than 80% of the Area Median Income for the San Diego area based on household size as determined annually by the U.S. Department of Housing and Urban Development. Household size is calculated by the number of persons residing at the same unit as their primary residence.

2 Moderate-income households are households of persons who claim primary residency at the same unit with combined incomes between 80% to 120% of the Area Median Income for the San Diego area based on household size as determined annually by the U.S. Department of Housing and Urban Development. Household size is calculated by the number of persons residing at the same unit as their primary residence.

Table 5.12-2. Past Performance RHNA 5th Cycle (2013–2020)

Income Level	RHNA Allocation by Level	Total Units to Date (all years)	Total Remaining RHNA (2019–2021)
Above Moderate	4,956	7,614	2,658
Total	**12,861**	**8,590**	**4,271**

Source: City of Chula Vista 2020.
Note: RHNA = Regional Housing Needs Assessment.

Table 5.12-3. RHNA Allocation for the 6th Cycle (2021–2029)

Income Category	RHNA Allocation by Level	Percentage of Total Units
Very Low	2,750	25%
Low	1,777	16%
Moderate	1,911	17%
Above Moderate	4,667	42%
Total	**11,105**	**100%**

Source: City of Chula Vista 2020.
Note: RHNA = Regional Housing Needs Assessment.

The General Plan incorporates a Housing Element (adopted July 13, 2021) that identifies strategies to expand housing opportunities for the City's various economic segments. Under the Housing Element, the provision of new housing opportunities within mixed use areas and at higher density levels, particularly transit focus areas, is encouraged. A primary issue of the Housing Element is the shortfall of housing, particularly affordable housing, in the City and the region. The 2021 Housing Element of the General Plan provides implementation mechanisms for effectively addressing Chula Vista's housing needs throughout the 2021–2029 planning period. Existing programs and policies of the 2013–2020 Housing Element are evaluated in the 2021 Housing Element to identify revisions and the current needs of Chula Vista's population (City of Chula Vista 2021c).

Goals and policies listed in the General Plan encourage the provision of a wide range of housing choices by location, type of unit, and price level, in particular the establishment of permanent affordable housing for low and moderate-income households. General Plan goals and policies ensure the availability of housing opportunities to persons regardless of race, color, ancestry, national origin, religion, sex, disability, marital status, familial status, source of income, or sexual orientation and support efforts to increase homeownership rates to build individual wealth (City of Chula Vista 2021c).

Employment

Employment and job growth have an influence on housing needs in the region and in the City. SANDAG's forecast of job growth for the City and the San Diego region from 2016 to 2050 estimates that the City's job growth is projected to be faster than growth projected in the San Diego region. Job growth in the City is expected to increase by 56.8%, while job growth in the San Diego region is projected to be 26.7% between 2016 and 2050.

As shown in Table 5.12-4, according to the U.S. Census Bureau, the City's labor force 16 years and older in 2021 was 128,931 people, with the leading industries being education, health care, and social services; retail trade; and professional, scientific, management, and administration services.

Table 5.12-4. Employment by Industry in City of Chula Vista

Labor Force Status	Persons
Employed Population 16 Years and Over	128,931
Agriculture	470
Construction	8,761
Manufacturing	10,526
Wholesale Trade	3,459
Retail Trade	14,338
Transportation and Warehousing	8,246
Information	1,354
Finance, Real Estate	6,965
Professional, Scientific, Management, and Administration	14,288
Educational, Health Care, and Social Services	32,149
Arts, Accommodations, and Food Services	10,6301
Public Administration	11,462
Other Services	6,301

Source: U.S. Census Bureau 2021.

5.12.2 Thresholds of Significance

The significance criteria used to evaluate the project impacts to population and housing are based on Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.). According to Appendix G, a significant impact would occur if the project would:

1. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).
2. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

5.12.3 Impacts

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

The project area is currently designated as General Industrial (I-G) in the City of Chula Vista General Plan. The zoning of the area would be amended to allow for a flexible combination of light industrial, office, commercial and visitor-oriented uses. The proposed uses would rejuvenate an underutilized property creating a diverse spectrum of new employment opportunities and restoring the approximate 1,000 jobs that existed on site during Rohr Industries operations.

As described above, the SANDAG Series 14 estimates population in Chula Vista would grow from 284,835 in 2025 to 288,141 in 2035; and employment would increase from 83,027 jobs in 2025 to 98,701 jobs in 2035 (SANDAG 2018). Based on the anticipated increase in jobs of 15,674 in the City, the proposed project would account for 6.4% of that increase. Construction jobs associated with the proposed project would be temporary and would not require permanent relocation into the City. Once operational, the estimated 1,000 jobs that would result from the proposed project would result in some amount of population growth within the City due to new employment

opportunities, however, this population growth would not be considered unplanned because the proposed project would restore what was previously a major job center for the City of Chula Vista.

The project site has been developed for decades and the surrounding area is substantially developed with mixed uses of commercial, and industrial uses. In addition, there are new development projects currently underway consisting of hotel, residential, and retail uses. Consequently, there is already significant existing infrastructure surrounding the project site. The project would be required to upgrade utility infrastructure and improve ingress and egress to the site. These improvements would serve the proposed project directly and would not indirectly induce unplanned population growth in the area.

Furthermore, the Growth Management Element of the City of Chula Vista's General Plan outlines the measures necessary to direct and coordinate growth and development in ways to improve the quality of life for current and future residents of Chula Vista. The proposed project fosters a development pattern that promotes orderly growth by developing on a site with previous industrial uses and improving the quality of life for current and future Chula Vista residences by restoring employment opportunities.

The proposed project would directly contribute to population growth in the area that is comparable to previous existing conditions and would not be considered substantial. Impacts would be **less than significant.**

Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No existing residential uses occupy the project site as the site was previously developed with industrial buildings, which have since been demolished. The proposed project does not include the construction of any residential units and would not displace existing housing or people or necessitate the construction of replacement housing elsewhere. **No impact** would occur.

5.12.4 Level of Significance prior to Mitigation

Impacts to housing and population would be **less than significant**.

5.12.5 Mitigation Measures

No mitigation is required.

5.12.6 Level of Significance after Mitigation

Impacts to housing and population would be **less than significant**.

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5.13 Public Services

This section describes the existing public services conditions of the project site, which includes police and fire protection, schools, and libraries; identifies associated regulatory requirements; and evaluates potential impacts related to implementation of the proposed project. Impacts to parks and recreation facilities are addressed in Section 5.14, Recreation.

5.13.1 Regulatory Framework

Federal

National Fire Protection Association

The National Fire Protection Association recommends that fire departments respond to fire calls within six minutes of receiving the request for assistance 90% of the time. These time recommendations are based on the demands created by a structural fire. It is crucial to attempt to arrive and intervene at a fire scene prior to the fire spreading beyond the room of origin. Total structural destruction typically starts within 8 to 10 minutes after ignition. Response time is generally defined as 1 minute to receive and dispatch the call, 1 minute to prepare to respond to the fire station or field, and 4 minutes (or less) travel time.

State

2019 California Fire Code

The California Fire Code (CFC; 24 CCR, Part 9) was published on July 1, 2019, and effective January 1, 2020. The CFC establishes regulations to safeguard life and property against hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises. The CFC also establishes requirements intended to provide safety and assistance to firefighters and emergency responders during emergency operations. The provisions of the CFC apply to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure throughout the State of California. The CFC includes regulations regarding fire-resistance-rate construction, fire protection systems such as alarm and sprinkler systems, fire service features such as fire apparatus access roads, means of egress fire safety during construction and demolition, and wildland–urban interface areas.

Mello-Roos Community Facilities Act of 1982

The Mello-Roos Community Facilities Act of 1982 permits the establishment of Community Facilities Districts (CFDs), commonly referred to as “Mello-Roos.” CFDs are special districts established by local governments as a means of financing public facilities, including schools, through a special tax imposed on the property within the CFD. The project site is located within existing CFDs for both the Chula Vista Elementary School District (CVESD) and the Sweetwater Union High School District (SUHSD).

Leroy F. Greene School Facilities Act/California Senate Bill 50/Proposition 1A

Two public school districts provide primary and secondary school facilities and services within the City: CVESD (kindergarten through 6th grade) and SUHSD (7th through 12th grade). Senate Bill 50 of 1998 enacted the Leroy F. Greene School Facilities Act and allows school districts to levy a fee, charge, dedication, or other requirement

against any development project within its boundaries for the purpose of funding the construction or reconstruction of school facilities. Some provisions of SB 50 were contingent on later voter approval of a bond issue, which the voters approved via Proposition 1A in November 1998. The statutes have been amended several times. Currently, the amount of fees varies by square footage, type of use, and the availability of other State funds for school facilities, and is subject to an inflation factor. Pursuant to California Government Code Section 65996, the payment of these fees by a developer serves to fully mitigate all potential project impacts on school facilities.

Local

City of Chula Vista General Plan

The City's General Plan (General Plan) was adopted on December 13, 2005, and last amended on March 17, 2020. The Public Facilities and Services Element establishes the City's plan to provide and maintain infrastructure and public services for future growth (City of Chula Vista 2005a).

Fire Protection Services

The General Plan recognizes that fire protection and emergency services will need to expand as the population in the City of Chula Vista grows. The Public Facilities and Services Element includes objectives to maintain sufficient levels of fire protection and emergency medical service to protect public safety and property (Objective PFS 5) and provide adequate fire protection services to newly developing and redeveloping areas of the City (Objective PFS 6). Additionally, GM 1 and Policy GM 1.11 provide for withholding discretionary approvals and subsequent building permits from projects demonstrated to be out of compliance with applicable threshold standards for fire and emergency medical services (City of Chula Vista 2005a).

Police Protection Services

The Public Facilities and Services Element of the General Plan includes objectives to maintain sufficient levels of police service to protect public safety and property (Objective PFS 5) and to provide adequate police protection services to newly developing and redeveloping areas of the City (Objective PFS 6). Additionally, Growth Management Objective GM 1 and Policy GM 1.11 provide for withholding discretionary approvals and subsequent building permits from projects demonstrated to be out of compliance with applicable threshold standards for police services (City of Chula Vista 2005a).

Schools

The General Plan recognizes that demand for school facilities will continue to increase as the City's population grows and states that it is the intent of the City to facilitate the efforts of the districts to provide school services. The Public Facilities and Services Element includes objectives to efficiently locate and design school facilities (Objective PFS 9 and10) (City of Chula Vista 2005a).

Libraries

The General Plan recognizes that demand for library facilities will continue to increase as the City's population grows in the eastern areas of the City through new development, and that location is the most important reason residents choose to patronize a particular public library. The General Plan Public Facilities and Services Element includes objectives for the City to provide a library system of facilities and programs that meets the needs of Chula Vista residents of all ages (Objective PFS 11) and to efficiently locate and design library facilities (Objective PFS 12).

Additionally, Growth Management Objective GM 1 and Policy GM 1.11 provide for withholding discretionary approvals and subsequent building permits from projects demonstrated to be out of compliance with applicable threshold standards for library services (City of Chula Vista 2005a).

Chula Vista Public Facilities Development Impact Fee

In August 1989, the Chula Vista City Council adopted Ordinance No. 2320 establishing a Public Facilities Development Impact Fee (PFDIF), which helps cover the cost of new or expanding public facilities within the City (City of Chula Vista 2005b). The facilities are required to support future development within the City, and the fee schedule has been adopted in accordance with California Government Code Section 66000. The proposed project would be subject to the payment of the fee at the rate in effect at the time building permits are issued. The PFDIF amount is determined through evaluation of the need for new facilities as it relates to the level of service demanded by new development, which varies in proportion to the equivalent dwelling unit generated by a specific land use.

The PFDIF addresses the project's proportional impact on capital facilities, such as structures and equipment. It does not address the impact associated with operations and maintenance for those facilities. Public funds such as property taxes, sales taxes, and fees generated by the project would be used to cover the incremental costs associated with providing services. The project would be required to pay the PFDIF, which would be used exclusively for future facility improvements necessary to ensure that the development contributes its fair share of the cost of facilities and equipment determined to be necessary to adequately accommodate new development in the City.

Chula Vista Municipal Code

CVMC Section 19.80.030 is intended to ensure that new development would not degrade existing public services and facilities below acceptable standards.

City of Chula Vista Public Library Strategic Facilities Plan

The City of Chula Vista Public Library (CVPL) Strategic Facilities Plan is intended as a foundation for the City and the library in planning the future of library facilities in Chula Vista. The CVPL Strategic Facilities Plan includes goals and objectives for implementing the library's vision and mission. These goals include maintaining an excellent and responsive materials collection, ensuring high quality of public library services through appropriate planning processes, ensuring that library programs and services are accessible to the broadest range of potential users, and increasing the visibility and community awareness of the library, its services, programs, and funding needs (City of Chula Vista 2011).

City of Chula Vista Public Library Strategic Vision Plan

The CVPL Strategic Vision Plan is a companion volume to the CVPL's 2011 Strategic Facilities Plan (City of Chula Vista 2014). The 2014 CVPL Strategic Vision Plan would guide the CVPL's service directions for the next decade, and summarizes the community's vision for the CVPL, strategic discussions for library services and facilities, and associated updates to the Strategic Facilities Plan.

5.13.1.1 Existing Public Services Setting

Police Protection

Police protection for the City of Chula Vista (City) is provided by the Chula Vista Police Department (CVPD), with its singular headquarters located at 315 4th Avenue, Chula Vista, California. The CVPD provides full-service police protection operating 24 hours a day, 7 days a week and staffed by 283 officers, 120 civilian employees, and dozens of volunteers. The current ratio of police officers required to adequately serve the residents of the City is 1.02 sworn police officers per 1,000 residents. CVPD has primary law enforcement jurisdiction in the city and responds to all reports of criminal activities and emergencies. All police officers and dispatchers meet requirements set by the California Commission on Peace Officer Standards and Training. Under the Chief of Police, CVPD is split into five divisions: Community Engagement Division, Patrol Operations, Investigations, Support Operations, and Administrative Services. The Community Engagement division includes the Research, Crime and Intelligence Analysis Unit, the Public Information Unit, the Community Policing Unit, the Public Information Unit, the Police Technology Unit, and the Audit and Accountability Unit. The Patrol Operations Division consists of the Community Patrol Unit, School Resource Officer Unit, Traffic Unit, and the Street Team and Gang Suppression Unit. The Investigation Division consists of the Criminal Investigations Division, the Special Operations Division, and the Strategic Operations Unit. The Support Operations Division consists of the Communications Center, City Jail, and the Professional Standards Unit. The Administrative Services Division consists of Fiscal Operations and Police Support Services.

Priority 1 calls are defined as emergency calls, which include life threatening calls, felony in progress, probability of injury (crime or accident), robbery or panic alarms, and/or urgent cover calls from officers (City of Chula Vista 2020a). Priority 1 calls may require a response such as an immediate response by two officers from any source or assignment and/or immediate response by paramedics/fire if injuries are believed to have occurred. Priority 2 calls are defined as urgent calls, which include: misdemeanor in progress, possibility of severe injury, serious non-routine calls (domestic violence or other disturbances with potential for violence), and/or burglar alarms (City of Chula Vista 2020a). Priority 2 calls may require a response such as an immediate response by one or two officers, from clear units, or those on interruptible activities (traffic, field interviews, etc.).

The CVPD has an average response time of 6 minutes and 14 seconds and responds to 76.43% of calls within 7 minutes and 30 seconds (City of Chula Vista 2021). For Priority 2 calls, the average actual response time is 14 minutes and 47 seconds. As of January 2021, the CVPD does not meet the threshold standards for Priority 1 threshold standards (for both Goal 1 and Goal 2), or the Priority 2 threshold standards. However, due to staffing shortages, CVPD does not expect to meet the threshold for the next 1–5 years (City of Chula Vista 2021). Further, beginning on October 22, 2018, CVPD began deploying drones from the rooftop of the CVPD Headquarters to respond to 911 calls and other reports of emergency incidents such as crimes in progress, fires, traffic accidents, and reports of dangerous subjects. This unique concept of operations is called Drone as First Responder (DFR) and it is a transformational method of policing that has demonstrated the ability to increase officer and community safety and reduce overall police response times (City of Chula Vista 2021).

CVPD maintains a mutual aid agreement with the San Diego County Sheriff's Office. If CVPD encounters an emergency situation that is beyond the extent or control of their resources, under the terms of the mutual aid agreement, the San Diego Sheriff's Office can provide police enforcement upon request by CVPD. Additionally, the City is a part of the California Disaster and Civil Defense Master Mutual Aid Agreement. This agreement states that all resources and facilities of the state, its various departments and agencies, and all its political subdivisions, municipal corporations, and other public agencies be made available to prevent and combat the effect of disasters

should they occur. It further states that in the event of a disaster such parties, including police forces, should voluntarily aid and assist one another (UDC 2014).

Fire Protection and Emergency Medical Services

The Chula Vista Fire Department (CVFD) provides fire protection services and emergency first response services for the City. The CVFD serves a population of 275,000 over a 52-square-mile service area (City of Chula Vista 2023a). Each day, there are 50 firefighters on duty, with an additional 2 firefighters per Strategic Quick Unit Apparatus Delivery unit. CVFD and Emergency Medical Services (EMS) provide responses to fire suppression, rescue, hazardous conditions, and all other emergency and non-emergency calls for service. Total staffing consists of 150 suppression firefighters, 11 fire prevention division staff, and 4 division chiefs. Every day CVFD has 2 battalion chiefs on duty, each covering one half of the City. These chiefs serve as supervisors for a number of fire stations and their respective crews and take command of major emergency incidents. Daily operations consist of 50 firefighters that staff nine engine companies, two aerial ladder trucks, two 12-hour squads, two battalion command vehicles, and one Type 1 Urban Search & Rescue. All staffed fire apparatus includes firefighter/emergency medical technicians (EMTs) and firefighter/paramedics serving in dual-role capacities. Ambulances have one single-role EMT and one single-role paramedic as personnel.

At time of preparation of this EIR, the City has 10 operating fire stations; however, by the end of 2024 there will be 11 stations and by the end of 2025 there will be 12 operating fire stations. Table 5.13-1 lists the existing fire stations in the City and their distance from the proposed project site.

Table 5.13-1 Chula Vista Fire Department Locations and Staffing

Station No.	Address/Location	Apparatus	Distance from Project Site
1	447 F Street Chula Vista, California 91910	Truck 51 Engine 51 Medic 51 Battalion 51	1.1 miles
2	80 East J Street Chula Vista, California 91910	Engine 52 OES 420 Medic 52	2.8 miles
3	100 Moss Street Chula Vista, California 91911	US&R 53 Tender/Trailer Medic 53	3.2 miles
4	850 Paseo Ranchero Chula Vista, California 91910	Engine 54	5.5 miles
5	341 Orange Avenue Chula Vista, California 91911	Engine 55 Medic 54 Medic 55	3.3 miles
6	605 Mt. Miguel Road Chula Vista, California 91914	Engine 56 Brush 56 Medic 56	8.3 miles
7	1640 Santa Venetia Chula Vista, California 91913	Engine 57 Truck 57 Medic 57 Battalion 52	11.2 miles

Table 5.13-1 Chula Vista Fire Department Locations and Staffing

Station No.	Address/Location	Apparatus	Distance from Project Site
8	1180 Woods Drive Chula Vista, California 91914	Engine 58	10.7 miles
9	1410 Brandywine Ave. Chula Vista, California 91911	Engine 59 Brush 5	6.0 miles
10	1715 Millenia Avenue Chula Vista, CA 9191	Engine 60 Medic 60	12.7 miles

Source: City of Chula Vista 2023b.

Fire Station 1, located at 447 F Street, is the closest fire station to the project site located 1.1 miles east. CVFD crew staffed at Fire Station 1 are able to access the site quickly from F Street to Bay Boulevard. Fire Station one possesses an Engine 51 and Truck 51 that are equipped with tools and apparatus to respond to fires, rescues, and medical emergencies.

The California Disaster and Civil Defense Master Mutual Aid Agreement states that all resources and facilities of the state, including all political subdivisions, shall voluntarily aid and assist each other in the event of a disaster by the interchange of services including fire protection (UDC 2014). The Chula Vista Emergency Services is the lead agency for emergency situations and collaborates with federal, state, and county agencies to prepare, respond, and provide recovery services for emergencies.

Per the City's Fire Prevention Division, the metric for responding to a fire incident is for the first apparatus with four firefighters to arrive on scene within 7 minutes 90% of the time. For structure fire incidents, the metric is for 14 firefighters to arrive on scene within 10 minutes 90% of the time. For advanced life support the metric is for the first ambulance to arrive on scene within 12 minutes 90% of the time; and for basic life support the metric is for the first ambulance to arrive within 20 minutes 90% of the time. The CVFD annual report evaluates several operations. In 2021, CVFD received a total of 28,774 calls for service citywide. Of this total, 88.1% were EMS-related calls, 2.1% were fire related, 95% were rescue related, 1.3% were hazardous condition related, and 2% were service calls. Of these calls, 89% were responded to within a response time of 7 minutes during financial year 2021.

The project applicant shall apply for and obtain required building and fire permits. Said permits shall comply with applicable codes and requirements including, but not limited to, the current edition(s) of the California Building Code ("CBC") and California Fire Code ("CFC") as may be amended by the City of Chula Vista. In addition, the project shall comply with the City of Chula Vista's adopted Municipal Code, California Fire Code, National Fire Protection Association Standards, and Chula Vista Fire Department's Fire Safety Engineering Standard Details and Requirements in effect at the time of permit application and plan submittal.

Schools

The City is served by the Chula Vista Elementary School District (CVESD) and the Sweetwater Union High School District (SUHSD). CVESD is the largest K–6 district in California, including 49 schools and serving 29,560 students from kindergarten through grade 6, with a select number of charter schools serving students grades 7 through 12. Within the CVESD there are a total of 41 elementary schools, 5 dependent charter schools, and 3 independent charter schools. SUHSD has 32 campuses and serves over 38,000 students in grades 7 through 12, as well as more than 10,000 adult learners. Within SUHSD, there are 13 middle schools and 15 high schools located in the

Cities of Chula Vista, Imperial Beach, National City, and San Diego (including the communities of Bonita, Eastlake, Otay Mesa, San Ysidro, and South San Diego). Total current and past enrollment in both school districts from 2017 through 2022 are shown in Table 5.13-2.

The closest schools to the project site are Mueller Charter School, Vista Square Elementary School, and Chula Vista Middle School. Mueller Charter School is located 0.8 miles southwest of the project site and Vista Square Elementary School and Chula Vista Middle School are located 1.2 miles to the east and 1.4 miles to the east, respectively. Additionally, Chula Vista High School is located 2 miles southeast of the site. No residents would live at the proposed project.

Table 5.13-2. Chula Vista School Districts Enrollment History

District	Enrollment Totals by School Year				
	2017–2018	2018–2019	2019–2020	2020–2021	2021–2022
CVESD	30,120	30,135	30,066	29,478	28,878
SUHSD	40,737	40,364	39,904	38,602	38,026

Source: Ed-data 2023a, 2023b.
Notes: CVESD = Chula Vista Elementary School District; SUHSD = Sweetwater Union High School District.

Parks

Refer to Section 5.14, Recreation, of this EIR regarding existing conditions for park facilities in the City.

Libraries

The City of Chula Vista Operates three library facilities: the South Chula Vista Branch Library, the Otay Ranch Branch Library, and the Civic Center Branch Library. The Civic Center Branch Library is the closest to the project site, located at 365 F Street, approximately 1.3 miles northeast of the site and consisting of 55,000 square feet. The Civic Center Branch is the system's largest facility and contains a surplus of unique resources including local history information, genealogy resources, and environmental impact reports (City of Chula Vista 2005a).

The South Chula Vista Branch library is located at 389 Orange Avenue, approximately 3.1 miles southeast from the project site. This branch is approximately 38,00 square feet. The Otay Ranch Branch Library is located at 2015 Birch Road in the Otay Ranch Town Center, approximately 14 miles east of the proposed project site, and consists of approximately 3,500 square feet (City of Chula Vista 2011, p. 13).

In addition to the existing libraries described above, the current Library Facilities Master Plan calls for construction of the approximately 30,000-square-foot Rancho del Rey Library, to be located at the intersection of East H Street and Paseo Ranchero, approximately 2.5 miles northeast of the proposed project site (City of Chula Vista 2011, p. 3). However, the Rancho del Rey Library has been delayed indefinitely due to budget constraints (City of Chula Vista 2014, p. 21).

According to the Chula Vista Public Library (CVPL) Strategic Vision Plan (City of Chula Vista 2014), an additional approximately 60,000 square feet of library space in the City would meet the needs of the buildout population. Because the proposed project would not increase the number of residences or population in the City, the project is not required to pay a PFDIF for library services.

5.13.2 Thresholds of Significance

The significance criteria used to evaluate the project impacts to public services are based on Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.). According to Appendix G, a significant impact related to public services would occur if the project would:

1. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
    a. Fire protection.
    b. Police protection.
    c. Schools.
    d. Other public facilities.

5.13.3 Impact Analysis

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

Fire protection

Based on current CVFD fire station distribution, Fire Stations 1, 2, and 3 are most likely to provide the initial response to the project site. However, all stations within CVFD are available to service the project site if necessary. As depicted in Table 5.13-1, CVFD Station No. 1, located at 447 F Street, is the closest station to the project site. This station is staffed by 9 firefighters with a Type 1 fire engine, a ladder truck, and a battalion chief vehicle. Fire Stations 2 and 3, which are located at 80 East J Street and 100 Moss Street, respectively, are the next two closest stations that could respond to the site. Station 2 is located 2.8 miles away and is equipped with a Type 1 engine, an OES 420 engine, and an ambulance. Station 3 is located 3.2 miles away and is equipped with a heavy rescue apparatus, ambulance, and a tender/trailer.

The City's PFDIF addresses a project's proportional impact on capital facilities, such as structures and equipment, associated with fire protection. The PFDIF does not address the impacts associated with operations and maintenance for those facilities, and it is the City's policy to use public funds such as property taxes, sales taxes, and fees generated by the proposed project to cover the incremental costs associated with providing fire services. The project would not substantially increase the demand of fire protection services requiring the construction of new or expanded fire protection facilities or facilitate the need for additional firefighters and equipment. Prior to demolition of the buildings onsite, they were being serviced by CVFD and once the proposed project is constructed CVFD would continue to provide fire suppression and emergency services to the site. Therefore, with continued service from CVFD, and payment of PFDIF fees, the project would have a **less-than-significant** impact on fire protection services.

Police protection

The project would require typical police protection services for a commercial/industrial development. CVPD would provide law enforcement services to the project site. CVPD currently provides police service to the project site from its existing police facility in downtown Chula Vista. Because the project does not include residences, there would not be an increase in population.

The City's PFDIF, described previously, would help cover the cost of new or expanding public facilities within the City, including police facilities. The proposed project would be subject to payment of the PFDIF fees at the rate in effect at the time building permits are issued. Payment of the PFDIF would be necessary to ensure that the project contributes its fair share of the cost of police facilities and equipment needed to adequately accommodate increasing demand within the City. Similar to fire suppression services, the previous buildings onsite were being serviced by the CVPD and service will continue once the proposed project is built. Therefore, with continued service from CVPD to the project site, and with the payment of PFDIF fees, the project would have a **less-than-significant** impact on police protection.

Schools

The proposed project would not increase the number of dwelling units or population within the City; therefore, there would not be an increased number of students generated by the project. Schools are funded through the payment of state mandated school fees pursuant to Senate Bill 50/California Government Code Section 65995. CVESD and SUHSD both collect Level I fees for new commercial/industrial developments (CVESD 2020; SUHSD 2022). These fees are required to be paid by future development prior to issuance of building permits.

As stated previously, the project site is located within existing CFDs for CVESD and SUHSD, which impose a special tax on property owners to finance both school districts. Any development of new school facilities resulting from these CFDs would be undertaken by the school district at that time. Pursuant to Education Code Section 17620(a)(1), the governing board can authorize the levy of a fee, charge, dedication, or other requirements against any construction within school district boundaries, and with the school district's collection of Statutory and Alternative fees developers can fully mitigate any impacts. Payment of these fees is considered adequate; therefore, the proposed project would have a **less-than-significant** impact on schools.

Other public facilities

The CVPL Strategic Vision Plan establishes a standard of 500 square feet of adequately equipped and staffed library facilities per 1,000 residents (City of Chula Vista 2014). The proposed project would not result in increased demand for libraries and would not have the potential to require the construction of new or expanded library facilities. Because the project is considered a commercial development, payment of PFDIF for libraries is not required. The proposed project would result in **no impact** on libraries.

5.13.4 Level of Significance prior to Mitigation

Impacts associated with fire protection, police protection, schools, and libraries would be **less than significant**.

5.13.5 Mitigation Measures

No mitigation measures are required.

5.13.6 Level of Significance after Mitigation

Impacts associated with fire protection, police protection, schools, and libraries would be **less than significant**.

5.14 Recreation

This section describes the existing recreational facilities adjacent to the project site and vicinity, identifies associated regulatory requirements, and evaluates potential impacts related to implementation of the Rohr Wohl Specific Plan Project (project or proposed project).

5.14.1 Existing Conditions

5.14.1.1 Regulatory Framework

Federal

No federal regulations or guidelines relating to recreation apply to the proposed project.

State

Quimby Act

The Quimby Act, enacted in 1975, creates a framework that allows cities and counties to provide parks for growing communities. The Quimby Act authorizes jurisdictions to adopt ordinances that require parkland dedication or payment of in-lieu fees as a condition of approval of residential subdivisions, The Quimby Act also specifies acceptable uses and expenditures of such funds, such as allowing developers to set aside land, donate conservation easements, or pay direct fees for park improvements.

Proposition 40 Park Bond Act

Proposition 40, also known as the Park Bond Act, allows for the maintenance for preservation of parks of the state's growing population by borrowing money through general obligation bonds for the development, restoration, and acquisition of state and local parks, recreation areas and historical resources, and for land, air, and water conservation programs.

Local

City of Chula Vista General Plan

The Public Facilities and Services Element in the City of Chula Vista's General Plan contains objectives to provide new park and recreation facilities for residents of new development (Objective PFS 15 and PFS 16) (City of Chula Vista 2005). Policy PFS 15.3 promotes the inclusion of park and recreational facilities in or near redevelopment area to serve both new development and to adhere to the existing park and recreation needs. Policy PFS 15.1 pursues the provision of developed parkland for new development project of three acres per one thousand residents. The City's existing parkland to resident ratio conditions do not meet the standards defined in Chula Vista Municipal Code (CVMC) 17.10.040. However, according to the City's Parks and Recreation Master Plan, in 2030, the City's forecasted population would be 340,215, resulting in the need for 1,237 total acres of developed parkland to meet the threshold (City of Chula Vista 2018). With the projected population and the planned additional 363 acres of new parkland, the City would have a parkland ratio of 3.64 acres of parkland per 1,000 residents. Policy 1.30 within the City's Parks and Recreation Master Plan also intends to encourage the development of

bikeways, trails, and paths that provide connections to the community and surrounding communities' parks and recreational facilities.

The City's General Plan includes a network of open space and trails that abut other regional open space areas and trails in the area, including: the Bayshore Bikeway; California Riding and Hiking Trail; Sweetwater Valley trail system; the future Otay Valley Regional Park (OVRP) trail system; and the open space preserve in the eastern portion of Otay Ranch. The previously mentioned open spaces and trail networks are regional facilities that connect to the City's network. The goals of the General Plan are to provide and maintain infrastructure and public services and improve sustainability of the City's natural resources as established in the Public Facilities and Services and Environmental Elements of the General Plan. The Environmental Element of the General Plan establishes the policy framework for improving sustainability through the responsible stewardship of the City's natural and cultural resources (Objective E.11), including the preservation of open space and development of connecting trails (City of Chula Vista 2005). The City is committed to providing an integrated network of open space areas throughout the City to serve residents, as well as to serve as a regional asset and attractor of visitors. The City has significant open space areas with a variety of natural resources. The City has taken a multi-track approach to the conservation and management of its open space resources. Additionally, Growth Management Objective GM 1 and Policy GM 1.11 provide for withholding discretionary approvals and subsequent building permits from projects demonstrated to be out of compliance with applicable park threshold standards (City of Chula Vista 2005).

City of Chula Vista Municipal Code and Growth Management Ordinance

CVMC Section 19.80.030, Controlled Development, is intended to ensure that development would not degrade existing public services and facilities below acceptable standards for parks and other public services. Similarly, CVMC Section 19.09, Growth Management, provides policies and programs that tie the pace of development to the provision of public facilities and improvements.

City of Chula Vista Greenbelt Master Plan

The City's Greenbelt Master Plan provides guidance and continuity for planning open space and constructing and maintaining the Greenbelt Trail (City of Chula Vista 2003a). The Greenbelt Master Plan addresses existing and potential trail locations, trail and staging area development standards, maintenance responsibilities and a system of trails and open space that serve as a unifying element in linking other trails within the central areas of the City. The future OVRP trail is planned parallel to the Otay River, approximately 1 mile south of the proposed project site (City of Chula Vista 2003b), and is part of the Chula Vista Greenbelt Trail system.

City of Chula Vista Parks and Recreation Master Plan

The City's Parks and Recreation Master Plan describes a comprehensive parks and recreation system that serves the community at large through the delivery of a variety of park sites containing a variety of recreational experiences. The master plan contains goals and policies that serve as a blueprint for creating a quality park system. The document establishes goals for the creation of a comprehensive parks and recreation system that meet the needs of the public by effectively distributing park types and associated recreation facilities and programs throughout the City (City of Chula Vista 2018).

City of Chula Vista Active Transportation Plan

The City's Active Transportation Plan is an update to the 2010 Pedestrian Master Plan and the 2011 Bikeway Master Plan. The City's Active Transportation Plan combines these two documents and focuses mainly on non-motorized users (City of Chula Vista 2020). The plan supports the integration of land use planning with transportation planning to take into account future land use and population projections and as a means to provide bicycle facilities to help decrease auto dependence. The plan also supports integrated planning efforts as a means to promote opportunities for exercise and recreation, highlighting the interconnection of bikeways with area parks.

5.14.1.2 Existing Recreation Setting

The City's Parks and Recreation Master Plan (2018) defines six park and recreation resource categories, detailed in Table 5.14-1.

Table 5.14-1. City of Chula Vista Parks and Recreation Resource Categories

Parks and Recreation Resource Category	Description
Regional Parks	Regional parks are large open space and recreational facilities, and include uses such as public golf courses, beaches, lakes, trails, campgrounds, and wildlife refuges. The Otay Valley Regional Park (OVRP) crosses three agency jurisdictions: the City of Chula Vista, City of San Diego, and County of San Diego. Located along the southern boundary of the City of Chula Vista, the OVRP provides significant open space and recreational opportunities for the region. Portions of regional parks developed with active recreation components consistent with community park standards may be eligible for public park credit.
Community Parks	Community parks are designed to serve more than one neighborhood, are ideally 30 or more acres, and provide a wide variety of facilities, including swimming pools, playing fields, recreation centers, cultural centers, and picnic areas. These parks, when developed in accordance with city standards, are eligible for public park credit.
Neighborhood Parks	Neighborhood parks are intended to serve local residents, range in size from 5 to 15 acres, and include open play space, playing fields, play equipment, and picnic areas. Neighborhood parks typically do not include community centers. These parks, when developed in accordance with city standards, are eligible for public park credit.
Mini-Parks	Mini-parks consist of both public and private facilities, are typically less than 4 acres in size, serve a smaller number of homes, and contain very limited facilities such as a tot lot or play structure and some grass play areas. Public mini-parks in the City of Chula Vista are typically located in the western portion of the City but could be located in master-planned communities in the east if listed within the development's parks agreement. Some mini-parks in the Eastlake community were given partial park credit and therefore are considered "public" but are privately owned and maintained. There are approximately seven areas of "public" mini-parks counted towards the City's park inventory. Private mini-parks are usually not considered for public park credit but may be provided to meet private open space and/or community purpose facility requirements. Private mini-parks are typically located east of Interstate 805, in master-planned communities.

Table 5.14-1. City of Chula Vista Parks and Recreation Resource Categories

Parks and Recreation Resource Category	Description
Urban Parks	Urban parks are generally located in urban downtown areas, are typically 20,000 square feet to 2 acres in size, and may contain facilities such as public plazas, tot lots, play structures, public art features, sports courts (such as basketball or tennis), walking/jogging trails, dog walk areas, picnic or seating areas, some grassy play area, trees, and other plant materials. Demand for parks within urban areas are different, in that the urban environment contains more residential density. Urban parks will occur west of Interstate 805 where infill and redevelopment activity is anticipated and where available and affordable land is scarce. Urban park locations are generally listed as shown in the Urban Core Specific Plan. These parks may be considered for public park credit as a necessary component of an overall park service solution or, as with mini-parks, urban parks may meet private open space or Community Purpose Facility obligations. Similar to mini parks, urban parks generally may serve a smaller number of homes than neighborhood parks, depending on the ultimate housing density within their service area.
Special-Purpose Parks	Special-purpose parks may vary largely in size, from just a few acres to over 100 acres; contain specialized facilities or themes; and serve the entire city. The 3.3-acre Living Coast Discovery Center and the 133.5-acre Chula Vista Municipal Golf Course are examples of special-purpose parks. A portion of the 150-acre Chula Vista Elite Athlete Training Center has the potential to become a special-purpose park, pending an identification of uses available to City residents.

Source: City of Chula Vista 2018.

According to the Chula Vista Parks and Recreation Master Plan, as of January 2018, the park system is composed of two types of facilities: public parks and recreation facilities. The City's public parks include 9 community parks totaling 230.5 acres, 38 neighborhood parks totaling 275.9 acres, 19 mini-parks totaling 22.1 acres, 14 special purpose parks totaling 187.3 acres, 1 urban park totaling 1.2-acres, and 1 town square totaling 1 acre (see Table 5.14-2). Recreation facilities in the City include 10 community centers totaling 71,652 square feet, 5 gymnasiums totaling 62,943 square feet, 2 aquatic centers totaling 58,748 square feet, and 1 senior center totaling 17,804 square feet. A detailed list of existing recreation facilities and public parks can be found in the City's Parks and Recreation Master Plan (City of Chula Vista 2018).

Table 5.14-2. Summary of Existing Citywide Public Parks and Major Recreation Facilities as of January 2018

Public Parks			Major Recreation Facilities		
Park Type	Quantity	Acres	Recreation Facility Type	Quantity	Square Feet
Community	9	230.5	Community Centers	10	71,652
Neighborhood	38	275.9	Gymnasiums	5	62,943
Mini	19	22.1	Aquatic Centers	2	58,748
Special Purpose	14	187.3	Senior Center	1	17,804
Urban	1	1.2	—	—	—

Table 5.14-2. Summary of Existing Citywide Public Parks and Major Recreation Facilities as of January 2018

Park Type	Public Parks		Recreation Facility Type	Major Recreation Facilities	
	Quantity	Acres		Quantity	Square Feet
Town Square	1	1	—	—	—
Total	**82**	**717.9**	**N/A**	**—**	**211,147**

Source: City of Chula Vista 2018.
Note: N/A = not applicable.

According to CVMC 17.10.040, the City's standard for parkland or the threshold for the provision of adequate parkland is currently 3 acres of parkland per 1,000 people. That is, for each multiple-family dwelling unit, 341 square feet, or 1 acre per 95 multiple-family dwelling units, is to be dedicated for parkland.

According to the U.S. Census Bureau, the City's population as of 2022 is 279,170 (see Section 5.12, Population and Housing, of this EIR) (U.S. Census Bureau 2022). Within the City, there are 718 acres of developed parks available to the public. Currently the ratio of parkland to population is approximately 2.73 acres parkland per 1000 residents, which does not meet the City's parkland ratio standards as defined by CVMC 17.10.040. However, eastern Chula Vista currently exceeds the threshold standards for parks, with 3.75 acres per 1,000 residents. The City's Parks and Recreation Master Plan indicates that the City would need to add 363 acres of public parks by 2030 to account for the expected population of 340,215 persons and comply with the parkland standards (City of Chula Vista 2018, p. 4-2).

There are numerous existing parks located within a 2-mile range of the proposed project site. These parks include Bayside Park, Bay Boulevard Park, Marina View Park, Living Coast Discovery Center, Bayfront Park, Plaza de Nacion, Will T. Hyde Friendship Park, Chula Vista Women's Club, Chula Vista Memorial Park, Norman Park, and Eucalyptus Park. Table 5.14-3 provides additional information on the parks including the street addresses, distance from the proposed project site, park resource type, and total acres. As noted earlier, public parks in the City are open to all area citizens. Neighborhood parks are those that generally serve a local adjacent or nearby residential neighborhood, while community parks serve the broader community and provide a wider range of services.

Table 5.14-3. Parks and Recreational Facilities Located within 2 Miles of the Proposed Project Site

Park Name	Street Address	Approximate Distance from Proposed Project Site	Park/Recreational Resource Category	Acres
Marina View Park	800 Marina Pkwy.	0.6 miles south	Special-purpose park	5.92
Bayfront Park	800 Marina Pkwy.	0.7 miles south	Special-purpose park	6.18
Bayside Park	Bayside Pkwy.	0.4 mile west	Special-purpose park	11.06
Bay Boulevard Park	F St. & Bay Blvd.	0.4 mile north	Mini-park	1.40
Living Coast Discovery Center	100 Gunpowder Pt.	0.6 mile north	Special-purpose park	3.33
Plaza de Nacion	276 4th Ave.	1.2 miles east	Urban park	1.20

Table 5.14-3. Parks and Recreational Facilities Located within 2 Miles of the Proposed Project Site

Park Name	Street Address	Approximate Distance from Proposed Project Site	Park/Recreational Resource Category	Acres
Will T. Hyde Friendship Park	4th Ave. & F St.	1.3 miles northeast	Neighborhood park	4.38
Chula Vista Memorial Park	373 Park Wy.	1.5 miles east	Neighborhood park	8.02
Chula Vista Women's Club	390 Garret Ave.	1.3 miles east	Special-purpose park	0.34
Norman Park	270 F St.	1.6 miles east	Mini-park	1.41
Eucalyptus Park	4th Ave. & C St.	1.9 miles northeast	Community park	19.69

Source: City of Chula Vista 2018, Table 4-3.

Regional and County Parks

The following are regional and County of San Diego parks within or adjacent to the City. Both regional and County parks are located in eastern Chula Vista and adjacent San Diego County.

Otay Valley Regional Park

Passing through the jurisdictions of the County of San Diego and the Cities of San Diego and Chula Vista, the OVRP is planned to encompass 8,000 acres. The park is located in the Multiple Habitat Planning Area of the City of San Diego and the Otay Ranch Preserve area of the City of Chula Vista under each Multiple Species Conservation Program (MSCP) Subarea Plan and represents one of the major open spaces within the southern San Diego County.

Otay Lakes County Park

This 78-acre park provides picnicking, a playground, a native plant and demonstration garden, and hiking trails. Currently, the park is operated by the County of San Diego Department of Parks and Recreation and will ultimately be the eastern gateway/staging area for the OVRP (County of San Diego 2023).

5.14.2 Thresholds of Significance

The significance criteria used to evaluate the project impacts to recreation are based on Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.). According to Appendix G, a significant impact related to recreation would occur if the project would:

1. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.
2. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

In addition, a third significance criterion from Section 5.13, Public Services, applies to impacts on recreation relating to parks:

3. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services: Parks.

5.14.3 Impacts

Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

The proposed project includes development of a variety of open spaces and amenities that would be available to the public as well as employees. These include terraces, roof decks, overlooks, plazas, paseos, greenways, boardwalks, and courtyards.

As discussed previously, the City's existing parkland to resident ratio conditions do not meet the standards defined in CVMC 17.10.040. However, the proposed project does not include the development of new residences and therefore would not require additional parkland be provided. There are two existing parks less than 0.5 miles from the project site that could be used by employees of the project. The increase in demand for parks or other recreational facilities by employees of the project is anticipated to be minimal, such that there would not be a substantial increase in the physical deterioration of existing park facilities. In addition, per CVMC Section 17.10.120, the proposed project would not be required to pay development fees because there are no proposed residences within the project. Therefore, because the proposed project would not cause substantial physical deterioration of a facility to occur or to be accelerated, the project would have a **less-than-significant** impact, and mitigation is not required.

Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

Parks.

The proposed project would not include any recreational facilities. However, as stated under Threshold 1, the project would provide open spaces and amenities such as terraces, roof decks, overlooks, plazas, paseos, greenways, and courtyards. This would provide the public with walkable and bikeable access to surrounding parks such as Bayside Park and J Street Harbor Park. The project would not induce substantial population growth such that expansion or construction of recreational facilities would be necessary because the project does not include new residents requiring recreational facilities. Therefore, the project would not require the construction of new recreational facilities or require the expansion of existing recreational facilities and impacts would be **less than significant**.

5.14.4 Level of Significance prior to Mitigation

The project would have **less-than-significant** impacts associated with recreation.

5.14.5 Mitigation Measures

No mitigation measures are required.

5.14.6 Level of Significance after Mitigation

No mitigation measures would be required. The project would have **less-than-significant** impacts associated with recreation.

5.15 Transportation

This section describes the existing transportation setting near the proposed project, identifies associated regulatory requirements, and evaluates potential impacts and identifies mitigation measures related to conflicts with an applicable program, plan, ordinance, or policy addressing the circulation system including transit, roadway, bicycle and pedestrian facilities; conflict or inconsistency with California Environmental Quality Act (CEQA) Guidelines Section 15064.3(b); a substantial increase in hazards due to a geometric design feature; and inadequate emergency access.

The state's adoption of Senate Bill (SB) 743 and subsequent adoption of CEQA Guidelines section 15064.3 provide that traffic delay under a level of service (LOS) metric is no longer considered a significant environmental impact under CEQA. State law now requires the use of a vehicle miles traveled (VMT) metric for land use development projects, which is intended to promote the state's goals of reducing greenhouse gas emissions and traffic-related air pollution, while promoting the development of multimodal transportation system, and providing clean, efficient access to destinations. This CEQA transportation impact analysis presents and uses the current VMT metric to best evaluate and disclose project impacts in a manner consistent with current state law and policies.

The proposed project consists of 3 planning areas: the eastern portion of the project site, closest to I-5 (between G Street and H Street), is designated as Planning Area A and is 9.29 acres. The largest planning area is Planning Area B-1, which is 26.13 acres, and Planning Area B-2, which is located south of B-1 and is 9.36 acres (Figure 4-2, Site Plan). A Project Information Form (PIF) has been prepared for Planning Area B-1. It should be noted that the entire Project (Planning Areas A, B-1, and B-2) will be screened out from conducting a detailed CEQA VMT analysis based on satisfying the criteria of the Project being located in a VMT-efficient area. The proposed project's VMT and other CEQA analysis are provided in this section and the traffic analysis using the LOS metric is provided consistent with City of Chula Vista (City) requirements and for informational purposes in Appendix K. This section relies on VMT to determine significance due to the requirements of SB 743; however, a discussion of LOS is provided for informational purposes.

- Appendix K: Rohr/Wohl Specific Plan Planning Area B-1, Planning Areas A & B-2, Local Mobility Analysis, prepared by Mizuta Traffic Consulting Inc., April 2024

5.15.1 Existing Conditions

This section provides a summary of the existing circulation network, bicycle and pedestrian facilities, and transit service near the proposed project.

Existing Street System

E Street is classified as an east-west 4-lane Class I Collector roadway west of Interstate (I) 5, a 4-lane gateway street between I-5 and Broadway, and a 4-lane urban arterial east of Broadway. Sidewalks are provided on both sides of the roadway. On-street parking is prohibited on both sides of the roadway. The posted speed limit is 30 miles per hour (mph).

F Street is classified as an east-west 4-lane Downtown Promenade between I-5 and Broadway and a 2-Downtown Promenade east of Broadway. Sidewalks are provided on both sides of the roadway. On-street parking is prohibited on both sides of the roadway. The posted speed limit is 30 mph.

G Street is currently functioning as an east-west 2-lane roadway from Marina Parkway to approximately 350 feet west of Bay Boulevard, which widens to a 4-lane roadway to Bay Boulevard. Sidewalks are provided on both sides of the roadway on the 4-lane section. There are no posted speed limits in the area.

H Street is classified as an east-west 4-lane major street between Marina Parkway and Street A and transitions to a 5-lane major street until the I-5 interchange. However, the roadway is currently not built to its ultimate classification and functions as a 3-lane roadway with two travel lanes in the westbound direction, one travel lane in the eastbound direction, and a center two-way left-turn lane. urban arterial in the immediate vicinity of the Project with two travel lanes provided in each direction. Sidewalks are provided on the north side of the roadway. On-street parking is prohibited on both sides of the roadway. There are no posted speed limits in the area.

J Street is classified as an east-west 4-lane major roadway east of the I-5 interchange. Sidewalks are provided on both sides of the roadway. On-street parking is prohibited on both sides of the roadway. The posted speed limit is 30 mph.

L Street is classified as an east-west 4-lane gateway street between the I-5 interchange and Broadway and a 4-lane Class I Collector roadway east of Broadway. Sidewalks are provided on both sides of the roadway. On-street parking is prohibited on both sides of the roadway. The posted speed limit is 35 mph.

Marina Parkway is classified as a north-south 4-lane major street between the I-5 interchange and H Street. Marina Parkway transitions into J Street east of the I-5 interchange. There are intermittent sidewalks provided on both sides of the roadway. On-street parking is prohibited on both sides of the roadway. The posted speed limit is 35 mph.

Bay Boulevard is classified as a 2-lane Class II Collector from E Street to F Street and transitions to a 2-lane Class III Collector from F Street to J Street. Sidewalks are provided on the west side of the roadway. On-street parking is prohibited on both sides of the roadway. The posted speed limit is 35 mph.

Figure 5.15-1 illustrates the roadway classification per City's Circulation Plan for Roadways.

Pedestrian Facilities

The roadway segments in the vicinity of the proposed project and located west of I-5 generally have sidewalks on one or both sides of the roadway except for the following locations:

- Lagoon Drive: Last 600 feet prior to turning into Marina Parkway
- Marina Parkway: Between Lagoon Drive and H Street
- G Street: Between Marina Parkway and Bay Boulevard

Pedestrians can walk along the west side of Bay Boulevard and cross the respective cross streets of F Street and H Street within the marked crosswalks. North of F Street, pedestrians would walk along the east side of Bay Boulevard until E Street. All curb ramps at the Bay Boulevard & H Street intersection have detectible warning strips. The other intersections along Bay Boulevard do not have detectible warning strips.

Figure 5.15-2 illustrates the Pedestrian Route Types per City's Active Transportation Plan.

Bicycle Facilities

There is a Class I bicycle path along the south side of H Street between Marina Parkway and Bay Boulevard and connects with the existing Bayshore Bikeway. There is a Class II bicycle lane on both sides of Bay Boulevard between E Street and L Street, both sides of F Street between Marina Parkway and I-5, and both sides of Marina Parkway between F Street and J Street.

Figure 5.15-3 illustrates the Existing and Planned Bike Facilities per City's Active Transportation Plan.

Transit Facilities

The Metropolitan Transit Service provides transit service to the E Street and H Street trolley stops with Routes 701, 704, 705, 709, and 932. There are no transit stops located west of I-5. Route 701 provides daily service between the H Street Transit Center and Palomar Street Transit Center. Headways are approximately 20 minutes during the weekday peak-hours.

Route 704 provides daily service between the E Street Transit Center and Palomar Street Transit Center. Headways are approximately 30 minutes during the weekday peak-hours.

Route 705 provides service on Monday through Saturday between the E Street Transit Center and Southwestern College. Headways are approximately 30 minutes during the weekday peak-hours.

Route 709 provides daily service between the H Street Transit Center and Eastlake. Headways are approximately 30 minutes during the weekday peak-hours.

Route 932 provides daily service between the 8th Street Transit Center and Iris Avenue Transit Center with stops at the E Street Transit Center. Headways are approximately 20 minutes during the weekday peak-hours.

The nearest transit stops (Routes 701 and 709) to the Project are located at the H Street Transit Center and approximately a 1,000-foot walk to/from the Project.

Figure 5.15-4 illustrates the Transit Facilities within a half-mile of the project site.

Vehicle Miles Traveled

For VMT, the San Diego Association of Governments (SANDAG) Regional Activity-Based Model outputs produce existing VMT per Capita and VMT per Employee for residents and employees, respectively, that live in the San Diego region. The SANDAG average VMT per employee for the region in the baseline or existing conditions is 18.90. The Project is located in Census Tract 12600, which has an average VMT per employee of 15.91. Census Tract VMT is 16 percent lower than the regional average.

Figure 5.1.5-5 illustrates the project census tract per SANDAG's VMT screening map.

5.15.2 Regulatory Framework

Federal

No federal regulations or guidelines relating to transportation apply to the proposed project.

State

Senate Bill 743

On September 27, 2013, Governor Brown signed Senate Bill (SB) 743, which became effective on January 1, 2014. The purpose of SB 743 is to streamline the review under the CEQA process for several categories of development projects, including the development of infill projects in transit priority areas, and to balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions. SB 743 adds Chapter 2.7, Modernization of Transportation Analysis for Transit Oriented Infill Projects, to the CEQA Statute (California Public Resources Code, Section 21099). Section 21099(d)(1) provides that aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment. In addition, SB 743 mandates that alternative metrics for determining impacts relative to transportation shall be developed to replace the use of LOS in CEQA documents.

In the past, environmental review of transportation impacts focused on the delay that vehicles experience at intersections and on roadway segments, which is often measured using LOS. Mitigation for impacts on vehicular delay often involves increasing capacity, such as widening a roadway or increasing the size of an intersection, which in turn encourages more vehicular travel and greater pollutant emissions. Additionally, improvements to increase vehicular capacity can often discourage alternative forms of transportation such as biking and walking. SB 743 directed the Governor's Office of Planning and Research (OPR) to develop an alternative metric for analyzing transportation impacts in CEQA documents. The alternative shall promote the state's goals of reducing greenhouse gas emissions and traffic-related air pollution, promoting the development of multimodal transportation system, and providing clean, efficient access to destinations. Under SB 743, it was anticipated that the focus of transportation analysis would shift from vehicle delay to VMT within transit priority areas (i.e., areas well served by transit).

Pursuant to SB 743, OPR released the draft revised CEQA Guidelines in November 2017, recommending the use of VMT for analyzing transportation impacts. Additionally, OPR released updates to the Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR 2018), to provide guidance on VMT analysis. In this Technical Advisory, OPR provides its recommendations to assist lead agencies in screening out projects from VMT analysis and selecting a significance threshold that may be appropriate for their particular jurisdiction. While OPR's Technical Advisory is not binding on public agencies, CEQA allows lead agencies to "consider thresholds of significance . . . recommended by other public agencies, provided the decision to adopt those thresholds is supported by substantial evidence" (14 CCR 15064.7[c]).

In December 2018, the CEQA Guidelines were updated to add new Section 15064.3, Determining the Significance of Transportation Impacts, which describes specific considerations for evaluating a project's transportation impacts using the VMT methodology. This new methodology is required to be used for projects beginning on July 1, 2020.

CEQA Guidelines Section 15064.3(b) is divided into four subdivisions as follows:

1. Land Use Projects. Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.

2. Transportation Projects. Transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less than significant transportation impact. For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately addressed, such as in a regional transportation plan EIR, a lead agency may tier from that analysis as provided in Section 15152.
3. Qualitative Analysis. If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate.
4. Methodology. A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled, and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project.

The Project is a land use development, therefore 15064.3(b)(1) would apply and transportation impacts have been assessed using the VMT metric.

Statewide Transportation Improvement Program and Interregional Transportation Improvement Program

The State Transportation Improvement Program (STIP) run by the California Transportation Commission (CTC) is a five-year investment plan for state transportation money and is updated every two years. Capital highway, local road, transit, and active transportation projects that San Diego region plans to fund may be included in the STIP to receive state funding. The most recent STIP was adopted in March 2022 (SANDAG 2021a) and current proposed 2024 STIP is expected to be adopted in March 2024 by CTC. The San Diego region's STIP is a subset of projects in the Regional Plan, which guides regional transportation investments for the next 20 years.

The regional spending plan developed by SANDAG accounts for 75% of the STIP. The remaining 25% of the STIP is a statewide spending plan known as the Interregional Transportation Improvement Program (ITIP) (Caltrans 2023). California Government Code Section 14526 specifies that the purpose of the ITIP is to fund projects that improve interregional movement for people and goods across California on the State Highway System and develop Intercity Passenger Rail corridors of strategic importance. The ITIP is one of many state funding programs that collectively invest in transportation infrastructure, maintenance and operations and is prepared by Caltrans for submittal to the CTC to assist with recommendations for projects in the STIP. Caltrans develops the ITIP to fund projects that connect metro areas and improve mobility across regional boundaries. SANDAG, in cooperation with Caltrans, seeks opportunities to improve interregional connections between San Diego County and Orange County on the I-5 Corridor, Riverside County on the I-15 corridor, Imperial County on the I-8 corridor, and on the critical freight and passenger Los Angeles to San Diego (LOSSAN) rail corridor.

Caltrans

Caltrans Transportation Impact Study Guide, May 20, 2020, provides that Caltrans' primary review focus is VMT, replacing LOS as the metric used in CEQA transportation analyses (Caltrans 2020). Caltrans recommends use of OPR's recommended thresholds and guidance on methods of VMT assessment found in OPR's Technical Advisory (OPR 2018) for land use projects. In addition to VMT, the 2020 Transportation Impact Study Guide states that it may request a targeted operational and safety analysis to address a specific geometric or operational issue related to the state highway system and connections with the state highway system.

Regional

SANDAG San Diego Forward: The 2021 Regional Plan

The San Diego Association of Governments (SANDAG) San Diego Forward: The 2021 Regional Plan (2021 Regional Plan) was adopted by the SANDAG Board of Directors on December 10, 2021 (SANDAG 2021b). It includes the region's Regional Transportation Plan (RTP); Sustainable Community Strategy (SCS), as required by SB 375; and Regional Comprehensive Plan. The 2021 Regional Plan provides a long-term blueprint for the San Diego region that seeks to meet regulatory requirements, address traffic congestion, and create equal access to jobs, education, healthcare, and other community resources. The SCS describes coordinated transportation and land use planning that exceeds the state's target for reducing per capita GHG emissions set by the California Air Resources Board (CARB). For the first time, the 2021 Regional Plan incorporates five transformational strategies known as the 5 Big Moves: Complete Corridors, Transit Leap, Mobility Hubs, Flexible Fleets, and Next Operating System. These interdependent strategies are designed to address the greatest transportation and mobility challenges, i.e., safety and traffic congestion, social inequities, and state and federal requirements, to reduce GHG emissions and air pollution.

The 2021 Regional Plan and its draft Environmental Impact Report were released for public and policymaker review in spring 2021 (SANDAG 2021c).

SANDAG also prepared a Regional Transportation Improvement Program (RTIP), a five-year investment plan that identifies projects and programs the San Diego region proposes to fund (SANDAG 2022). The primary purpose of the RTIP is to incrementally implement the latest Regional Plan, which guides regional transportation investments for the next 20 years. Projects funded with federal, state, or TransNet money must be included in an approved RTIP. For SANDAG projects to be incorporated in the RTIP, projects must first be included in the SANDAG Program Budget approved by the SANDAG Board of Directors. The 2023 RTIP (SANDAG 2022) covers five fiscal years (FY 2023 through FY 2027) and incrementally implements the SANDAG 2021 Regional Plan. SANDAG was accepting public comments on RTIP Amendment No. 9 until January 19, 2024.

Local

City of Chula Vista General Plan

The City of Chula Vista General Plan (General Plan), known as Vision 2020, was adopted by the City on December 13, 2005 (City of Chula Vista 2005). The General Plan and its subsequent amendments form the foundation upon which all land use decisions in the City are based.

The General Plan and its associated Sectional Planning Area (SPA) Plans include goals and policies that guide the City's growth. The General Plan currently includes many policies that relate to and support the intent of SB 743.The General Plan and SPA Plan policies that are most consistent with the intent of SB 743 are those regarding planned

improvements, including new roadways and new pedestrian and bicycle facilities, and policies and programs to enhance and encourage bicycle, pedestrian, and transit modes. For example, the evaluation of existing transit services in order to enhance mobility and accessibility within Chula Vista, providing the provision of sidewalks along arterial roadways, providing the provision of shuttle services on some local roads, and the encouragement of the development of high-density mixed land use projects are among the existing Chula Vista policies that align with SB 743 (City of Chula Vista 2020a).

The project site is located in the Bayfront Planning Area and Harbor District subarea of the General Plan (City of Chula Vista 2005). The Land Use and Transportation Element establishes the land use categories, roadway classifications, and generalized land use patterns for City development and focuses on themes that (1) support strong community character and image, (2) support strong and safe neighborhoods, and (3) improve mobility.

Chula Vista Bayfront Specific Plan

Chapter 19.81 of the CVMC defines the scope and purpose of the Bayfront Specific Plan. This chapter of the CVMC is intended to implement the Chula Vista General Plan and the Chula Vista Local Coastal Program (LCP) Land Use Plan (LUP) and their goals, objectives, and policies. Chapter 19.84 of the CVMC provides for the classification of land use and the regulation of development by land use and zoning parcel. The project is zoned as Industrial in the Bayfront Specific Plan. Chapter 19.85 of the CVMC outlines the development criteria for the Bayfront Specific Plan.

Chula Vista Bayfront Local Coastal Program Land Use Plan

The Chula Vista Bayfront LCP Amendment Bayfront Specific Plan was adopted in 2012 and amended in 2017. It governs the development of 722 acres of the City's bayfront. The LCP provides a detailed plan for the orderly growth, development, redevelopment, and conservation of the City jurisdictional parcels located within the Chula Vista Bayfront coastal area. Each coastal city and county's LCP is required to be pursuant to the California Coastal Act and approved by the California Coastal Commission. This LCP is consistent with the City General Plan and represents a step toward systematic implementation of the General Plan in the bayfront. The LUP provides land use and development policies to ensure that development within the bayfront will be consistent with the provisions of the California Coastal Act. The project site is within the Harbor District subarea, described in the LCP. The LUP outlines objectives and policies as the standard review for coastal development permits (City of Chula Vista 2012).

Chula Vista Municipal Code

Chula Vista Municipal Code (CVMC) Chapter 3.54 establishes a Transportation Development Impact Fee to fund transportation improvements and facilities within the Eastern Territories of the City and requires payment prior to the issuance of building permits for development. Section 3.54.030 lists the transportation facilities to be financed by the fees collected and includes a total of 72 roadways within the City. In addition, CVMC Chapter 12.24, Dedications, imposes reasonable requirements upon developers of traffic-generating developments within the City to mitigate potential dangers associated with the (1) lack of sidewalks; (2) moving, high, and stagnant waters during the rainy season; (3) streets of inadequate widths; (4) poor drainage due to the lack of curbs, storm drain facilities and improved alleys; and (5) inadequate street lighting, to the extent reasonably possible.

City of Chula Vista Transportation Study Guidelines

The City of Chula Vista adopted their Traffic Study Guidelines (TSG) in June of 2020 to comply with SB 743. The guidelines were revised in January 2022. The TSG provides criteria to evaluate projects for consistency related to

the City's transportation goals, policies, and plans, and through procedures established under CEQA. The TSG establishes the content requirements and procedures for preparing a Transportation Study in Chula Vista (City of Chula Vista 202a).

The purpose of the TSG (and a Transportation Study) is to provide applicants, transportation professionals, and City personnel with standard procedures and guidelines to support CEQA review of a project's transportation impacts and a project's effects on local traffic congestion through a Local Mobility Analysis (LMA).

The project's VMT analysis per CEQA requirements is provided in this section. The project's LMA prepared by Mizuta Traffic Consulting, Inc. is included as Appendix K. The approach and methodology for both CEQA and no-CEQA analyses are consistent with the City's TSG for the purposes of evaluating the project's potential transportation impacts and effects.

Active Transportation Plan

The City of Chula Vista adopted the Active Transportation Plan (ATP) on May 12, 2020. This plan is an update to the 2010 Pedestrian Master Plan and 2011 Bikeway Master Plan and combines these two documents into one integrated mobility plan focused primarily on non-motorized users and introduces recent micro-mobility trends new to the public roadways in Chula Vista. The ATP focuses enhancing the safety and comfort of existing pedestrian and bicycle facilities as well as increasing connectivity to key attracting land uses such as schools, employment centers, retail districts and recreational areas (City of Chula Vista 202b).

5.15.3 Methodology

In December 2018, the CEQA Guidelines were updated to include a threshold for evaluating traffic impacts using a VMT methodology. This new methodology was required to be used statewide beginning on July 1, 2020.

The City of Chula Vista has an adopted TSG which includes methodology, screening criteria, and analysis procedures for conducting a CEQA VMT analysis for projects located within the City. This section summarizes the methodologies used to perform the VMT analysis.

Vehicle Miles Traveled (CEQA Analysis)

The Updated CEQA Guidelines, Section 15064.3 state that "generally, vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts" and define VMT as "the amount and distance of automobile travel attributable to a project." "[A]utomobile" refers to on-road passenger vehicles, specifically cars and light trucks. OPR has clarified in the Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR 2018) (Technical Advisory) and recent informational presentations that heavy-duty truck VMT is not required to be included in the estimation of a project's VMT. Other relevant considerations may include the effects of the project on transit and non-motorized traveled.

The City has adopted VMT analysis guidelines and thresholds (City of Chula Vista 2020a). For the purposes of the Project analysis, the VMT screening analysis methodology and thresholds identified within the City's TSG were used.

VMT Screening and Analysis Approach

The following will be the primary method of the Project's VMT analysis:

1. Determine if the project can be screened out from requiring detailed VMT analysis and presumed as less than significant by comparing the project features to screening criteria presented in the City's TSG.
2. Determine the VMT/Employee (for employment-based projects) using the VMT Screening Tool published by the City (consistent with SANDAG San Diego Region SB743 VMT Maps).
3. Compare the screening criteria or project results to the applicable or most appropriate threshold. For the proposed project, the project's VMT/Employee is compared to the SANDAG regional average to determine if the project would have a potentially significant impact. Additionally, project is located within a Transit Accessible Area, however it does not meet the parking requirement specified for this VMT screening criteria.

The City's TSG state the following criteria can be applied to effectively screen projects from project-level VMT assessment under the presumption that they would result in a less than significant transportation impact. The proposed project's characteristics are also described for each screening criteria.

- **Small Residential and Employment Projects:** Projects generating 200 or less daily vehicle trips may be presumed to have a less than significant impact absent substantial evidence to the contrary. As shown in Table 5.15.1, the project would generate more than 200 daily trips. Therefore, the proposed project would not meet this screening criteria.
- **Projects located in a Transit Accessible Area or Buffer (near Transit Priority Areas and near stops along High-Quality Transit Corridors):** Within a Transit Buffer Projects located in a transit priority area1 (TPA) or half-mile walkshed of an existing stop along a high-quality transit corridor2 may be presumed to have a less than significant impact, absent substantial evidence to the contrary. Projects must be entirely within a TPA or have a half-mile walkshed from all points within the project site to qualify for this screening. Projects located in a TPA and a half mile from stops along high-quality transit corridors can help reduce VMT by increasing capacity for transit-supportive residential and/or employment densities in low VMT areas. The increased density that is associated with projects in a TPA can increase transit ridership and therefore justify enhanced transit service which would in turn increase the amount of destinations that are accessible by transit and further increase transit ridership and decrease VMT. Additionally, the OPR Technical Advisory states, "generally should presume that certain projects (including residential, retail, and office projects, as well as projects that are a mix of these uses) proposed within ½ mile of an existing major transit stop or an existing stop along a high-quality transit corridor will have a less-than-significant impact on VMT."

  This presumption is only appropriate if the project meets the following conditions:

  A. Has a Floor Area Ratio (FAR) of more than 0.75: The project's FAR is for Planning Area A is 3.0, for Planning Area B1 is 1.0 and Planning Area B-2 is 2.0, therefore the project FAR exceeds 0.75.
  B. Includes no more than the minimum parking for use by residents, customers, or employees of the project as required by the City of Chula Vista: As shown in the project's PIF form (Appendix K), the

[1] A transit priority area is the area within 0.5 miles of a major transit stop, which is defined as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. A high quality transit corridor is defined as a corridor with fixed-route bus service, with service intervals no longer than 15 minutes during peak commute periods. Pub. Resources Code Section 21064.3

[2] Pub. Resources Code, Section 21155:"For purposes of this section, a high-quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours."

Planning Area B-1 would include 769 parking spaces and approximately 619 spaces are required per City's code.

C. Is consistent with relevant City planning documents: The project is proposing amendments and would be governed by the Rohr Wohl Specific Plan; however based on the allowed and proposed land uses, the project is considered to be consistent with the goals and policies of City planning documents. See Table 5.10-1 in Land use and Planning section for a detailed consistency analysis.

D. Does not include a smaller number of units that previously on the project site: The project does not include housing unit and would not replace affordable residential units.

E. Does not replace affordable residential units with moderate- or high-income residential units.

As shown in Figure 5.15-5, VMT Screening Map for Project, the proposed project (A, B1, and B2) is in census tract 12600 which is within a transit buffer or is considered a TPA. The project is located within a 1,000-foot walkshed to the H Street Transit Center which is served by routes 701 and 709. As shown under analysis of Threshold a, the proposed project is consistent with relevant City planning documents. Because the proposed project provides more than the minimum parking requirements for Planning Area B-1, and due to unavailability of detailed parking requirements of uses proposed for Planning Area A and B-2, the transit buffer screening criteria is not met at the time of this writing.

- **Local Serving Retail Projects:** Local serving retail projects less than 125,000 square feet[3] and that would serve the local community may be presumed to have a less-than-significant impact absent substantial evidence to the contrary. The proposed project does not have any uses that would be considered local serving retail, therefore, this screening criteria would not apply.
- **Local Serving Public Facilities and Community Purpose Facilities:** Public facilities that serve the surrounding community or public facilities that are passive uses may be presumed to have a less than significant impact absent substantial evidence to the contrary. The proposed project does not include any local serving public facilities or community purpose facilities per City's land use designation and municipal code, therefore, this screening criteria would not apply.
- **Redevelopment Projects with Greater VMT**: A redevelopment project may be presumed to have a less than significant impact absent substantial evidence to the contrary if the proposed project's total project VMT is less than the existing land use's total VMT. The proposed project would redevelop some of the existing uses and an existing use trip generation credit has been applied to estimate the project trip generation. However, due to the nature of the project, a development VMT has not been estimated for the proposed project.
- **Affordable Housing:** Any portion of a project that is composed of deed restricted affordable housing units may be presumed to have a less than significant impact absent substantial evidence to the contrary. The proposed project does not include affordable housing, therefore, this screening criteria would not apply.
- **Projects located in a VMT-Efficient Area:** A VMT-efficient area is any area within the City with an average VMT per Capita or VMT per Employee below the thresholds as compared to the baseline regional average for the census tract it is located within. The project meets this screening criteria. See analysis provided in Section 5.15.5 under Threshold b.

[3] City of Chula Vista Transportation Study Guidelines (City of Chula Vista 2020a, p. 19): 125,000 square feet is the maximum size that a commercial development can be while still being considered Neighborhood Shopping Center by SANDAG's (Not So) Brief Guide of Vehicular Trip Generation Rates for the San Diego Region.

Projects that do not meet any screening criteria must include a detailed evaluation of the VMT produced by the project. The significant thresholds and specific VMT metrics used to measure VMT are described by land use type below.

- Residential: 15% below regional average VMT per Capita
- Employment: 15% below regional average VMT per Employee
- Industrial Employment: At or below regional average VMT per Employee
- Mixed-Use: Each project component evaluated per the appropriate metric based on land use type (i.e., residential, employment, and retail)
- Regional Retail, Regional Recreational, or Regional Public Facilities: A net increase in total regional VMT using the boundary method
- Other Project Types: TSG provides a list with unique land use categories and their appropriate VMT metric or thresholds of significance

The project's VMT analysis is conducted using City VMT maps which incorporate SANDAG data, and using the VMT per employee metric for the entire site and includes the three planning areas.

Trip Generation

The project's LMA consists of a combination of a project- and programmatic-level analyses using the project trip generation. The project-level analysis would be completed for the uses in Planning Area B-1. The programmatic-level analysis would be completed for the uses in Planning Areas A and B-2.

Trip generation rates published by the SANDAG Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region (SANDAG 2002) were applied to the existing and proposed uses on site to estimate the traffic generation characteristics of the site. Based on the truck splits from ITE Trip Generation Manual 11th Edition, passenger cars would account for 83.1% trips of the total trips generated by a warehouse facility and the truck trips would account for approximately 16.9% of the total trips (ITE 2021). Additionally, the Warehouse Truck Fleet Mix from the South Coast Air Quality Management District's (SCAQMD) Warehouse Truck Trip Study Data Results and Usage (SCAQMD 2014) was used to estimate project-related truck traffic split into two-axle, three-axle, and four-plus axle trucks. These truck trips generated by the project were then converted to passenger car equivalent (PCE) trips by using recommended PCE factors, and their disproportionate effect on roadway capacity

As shown in the table, the Project is forecasted to generate a subtotal of 7,520 daily trips with 903 AM peak-hour trips and 903 PM peak-hour trips for the Project-Level Analyses and a total of 8,168 daily trips with 487 AM peak-hour trips and 767 PM peak-hour trips for the Programmatic Level Analyses. After applying the existing trip credits, the Project-Level Analysis is forecasted to generate a net total of 5,115 daily trips with 446 AM peak-hour trips and 442 PM peak-hour trips. The Programmatic-Level Analysis is forecasted to generate a net total of 6,349 daily trips with 210 AM peak-hour trips and 460 PM peak-hour trips.

Adjusting for PCE, the Project is forecasted to generate a subtotal of 8,501 daily PCE trips with 1,065 AM PCE peak-hour trips and 1,065 PM PCE peak-hour trips for the Project-Level Analyses and a total of 8,581 daily PCE trips with 557 AM PCE peak-hour trips and 837 PM PCE peak-hour trips for the Programmatic Level Analyses. After applying the existing trip credits, the Project-Level Analysis is forecasted to generate a net total of 6,096 daily PCE trips with 608 AM peak-hour trips and 584 PM peak-hour trips. The Programmatic-Level Analysis is forecasted to generate a net total of 6,762 daily PCE trips with 280 AM PCE peak-hour trips and 530 PM PCE peak-hour trips.

The total net trip generation (non-PCE) is approximately 11,464 daily trips, 656 AM peak-hour trips and 882 PM peak-hour trips. Table 5.15.1 summarizes the weekday trip generation rates and calculations.

Table 5.15-1. Project Trip Generation

Trip Generation Rates[1]							
Land Use	Weekday Daily	AM PEAK		PM PEAK			
		% ADT	In:Out Ratio	% ADT	In:Out Ratio		
Warehousing	5 trips / ksf	13%	0.70: 0.30	15%	0.40: 0.60		
Resort Hotel	8 trips / rm	5%	0.60: 0.40	7%	0.40: 0.60		
Industrial/Business Park (w/commercial)	16 trips / ksf	12%	0.80: 0.20	12%	0.20: 0.80		
Manufacturing/Assembly	4 trips / ksf	19%	0.90: 0.10	20%	0.20: 0.80		
Quality Restaurant	100 trips / ksf	1%	0.60: 0.40	8%	0.70: 0.30		

Trip Generation Calculations									
Land Use	Planning Area	Amount	ADT	AM PEAK			PM PEAK		
				In	Out	Total	In	Out	Total
Existing Uses									
Warehousing	A	231.174 ksf	1,156	106	45	151	70	104	174
Manufacturing/Assembly	B-1	601.225 ksf	2,405	412	45	457	97	384	481
Manufacturing/Assembly	B-2	165.612 ksf	663	114	12	126	27	106	133
		Existing Trips	*4,224*	*632*	*102*	*734*	*194*	*594*	*788*
Proposed Uses									
Project-Level Analysis									
Industrial/Business Park (w/commercial)	B-1	470.000 ksf	7,520	723	180	903	181	722	903
Passenger Cars (83.1% Daily, 88.2% AM, 88.2% PM):			6,884	638	159	797	160	637	797
Trucks (16.9% Daily, 11.8% AM, 11.8% PM)[2]:			636	85	21	106	21	85	106
		2-axle (16.7%, PCE = 1.5)3, 4:	*160*	*21*	*5*	*26*	*5*	*21*	*26*
		3-axle (20.7%, PCE = 2)3, 4:	*264*	*35*	*9*	*44*	*9*	*35*	*44*
		4+ axle (62.6%, PCE = 3)3, 4:	*1,193*	*159*	*39*	*198*	*39*	*159*	*198*
		Subtotal (Trucks with PCE):	*1,617*	*215*	*53*	*268*	*53*	*215*	*268*
Subtotal: Project-Level Analysis									
		Total Vehicle Trip Generated (Passenger Cars and Trucks)	**7,520**	**723**	**180**	**903**	**181**	**722**	**903**

Table 5.15-1. Project Trip Generation

Total Trip Generation (Passenger Cars and Trucks with PCE)			**8,501**	**853**	**212**	**1,065**	**213**	**852**	**1,065**
Net: Project-Level Analysis									
Total Vehicle Trip Generated (Passenger Cars and Trucks)			**5,115**	**311**	**135**	**446**	**84**	**338**	**422**
Total Trip Generation (Passenger Cars and Trucks with PCE)			**6,096**	**441**	**167**	**608**	**116**	**468**	**584**
Programmatic-Level Analysis									
Industrial/Business Park (w/commercial)	A	198.000 ksf	3,168	305	76	381	77	304	381
Passenger Cars (83.1% Daily, 88.2% AM, 88.2% PM):			2,900	269	67	336	68	268	336
Trucks (16.9% Daily, 11.8% AM, 11.8% PM)[2]:			268	36	9	45	9	36	45
2-axle (16.7%, PCE = 1.5)[3, 4]:			*67*	*9*	*2*	*11*	*2*	*9*	*11*
3-axle (20.7%, PCE = 2)[3, 4]:			*111*	*15*	*4*	*19*	*4*	*15*	*19*
4+ axle (62.6%, PCE = 3)[3, 4]:			*503*	*68*	*17*	*85*	*17*	*68*	*85*
Subtotal (Trucks with PCE):			*681*	*92*	*23*	*115*	*23*	*92*	*115*
Resort Hotel	B-2	175 rm	1,400	42	28	70	40	58	98
Quality Restaurant	B-2	36.000 ksf	3,600	22	14	36	202	86	288
Subtotal: Programmatic-Level Analysis									
Total Vehicle Trip Generated (Passenger Cars and Trucks)			**8,168**	**369**	**118**	**487**	**319**	**448**	**767**
Total Trip Generation (Passenger Cars and Trucks with PCE)			**8,581**	**425**	**132**	**557**	**333**	**504**	**837**
Net: Programmatic-Level Analysis									
Total Vehicle Trip Generated (Passenger Cars and Trucks)			**6,349**	**149**	**61**	**210**	**222**	**238**	**460**
Total Trip Generation (Passenger Cars and Trucks with PCE)			**6,762**	**205**	**75**	**280**	**236**	**294**	**530**
Total Net Project			**11,464**	**460**	**196**	**656**	**306**	**576**	**882**

Source: Appendix K.
Notes: ksf: 1,000 sf, rm: rooms
1 The trip rates are based on SANDAG's Brief Guide of Vehicular Trip Generation Rates for the San Diego Region, April 2002.
2 The truck trip rates for the project's land uses are based on the Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition for the
3 The recommended truck mix percentages are based on the South Coast Air Quality Management District's (SCAQMD) Warehouse Truck Trip Study Data Results
4 The PCE factors are based on the County of Riverside Transportation Analysis Guidelines, December 2020.

5.15.4 Significance Criteria

The significance criteria used to evaluate the project impacts to transportation are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to transportation would occur if the project would:

1. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.
2. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).
3. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
4. Result in inadequate emergency access.

5.15.5 Impacts

Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

General Plan Consistency

The General Plan land use and transportation element for the city focuses on supporting strong community character and image, supporting strong and safe neighborhoods and improving mobility. The purpose and intent of the proposed project is to provide for compatible uses such as commercial, light industrial uses and business park uses on the underutilized project site, thereby creating new employment opportunities and successfully restoring what was a major job center for the City. The uses such as resort hotel, retail and restaurants would also complement the future development proposed in the Chula Vista Bayfront Master Plan to the south of the proposed project.

A detailed consistency analysis with the Land use and Transportation Element objectives and policies is provided in Table 5.10-1 in Section 5.10, Land Use and Planning.

The project's LMA (Appendix K) provides potential effects relative to consistency with LOS policies used by the City over each of the study intersections. Pursuant to Public Resources Code Section 21099(b)(2) and CEQA Guidelines Section 15064.3(a), a project's effect on automobile delay is not considered a significant environmental effect, therefore, no further discussion is required. However, the project would construct improvements or pay for its fair share towards roadway and/or intersection improvements such as signalization or optimizing signal timings to improve mobility around the project site.

As shown in the LMA, the project would be fully responsible for signalizing the Bay Boulevard & G Street and Project Driveway & H Street intersections and retiming the signals at the I-5 Northbound Ramps & E Street, Bay Boulevard & H Street, I-5 Northbound Ramps & H Street, and I-5 Northbound and Southbound Ramps & J Street intersections. The Project would contribute its fair share towards the construction of a traffic signal or roundabout at the Bay Boulevard & F Street. The Project would contribute its fair share towards the construction of a traffic signal at the J Street and L Street intersections with Bay Boulevard. All proposed improvements would achieve LOS D or better conditions during both peak periods except for the roundabout at Bay Boulevard & F Street. The improvements identified in the LMA are recommendations and the final improvement plan and project funding responsibility will be defined and documented in a separate Rohr/Wohl Specific Plan Transportation Conditions of Approval memo.

Bike and Pedestrian Facilities

The proposed project would not conflict with existing bike facilities along H Street and Bay Boulevard. According to the City's ATP, there are three bicycle projects that are shown in the top 10 bicycle projects list near the proposed project. These projects include the following:

- H Street between Bay Boulevard and Third Avenue (Rank 1): Construct a multi-use path on both sides of the roadway.
- Bay Boulevard between E Street and H Street (Rank 6): Construct a multi-use path.
- F Street between Bay Boulevard and Third Avenue (Rank 7): Construct a multi-use path.

The Bayshore Bikeway segment between Lagoon Drive and H Street (referenced as Segment 6B in the City's ATP) is proposed to be located along the abandoned rail line between Planning Area A and B-1/B-2. This extension of the Bayshore Bikeway would be a new multi-use path with proposed cross section of 14-feet width that includes a 5-foot shared use path and a 2-foot shoulder in each direction. It should be noted that project construction, including subsequent phases of the project, would not conflict with the future construction of the proposed Bayshore Bikeway segment.

As part of the Chula Vista Bayfront Phase 1A Improvements Project, bicycle detectors will be added at the approach to the Bay Boulevard & H Street intersection. There is also a Class II bicycle lane on both sides of Bay Boulevard between G Street H Street.

As part of the Project, sidewalks will be constructed along the Project's frontage of G and H Street. All Project driveways would be constructed to City standards and include warning detectible strips at the curb returns. The Chula Vista Bayfront Phase 1A Improvements consist of new 24-inch white thermoplastic ladder style crosswalks on the north, south, and west legs of the Bay Boulevard & H Street intersection. At the Marina Parkway & H Street intersection, a new traffic signal will be constructed and will include all new curb returns with warning detectible strips and a 24-inch white thermoplastic ladder style crosswalk on all legs of the intersection. Within the Project site, all internal roadways would have sidewalks on both sides of the roadway. No sidewalk gaps that would exist with the proposed project and pedestrians would have a continuous path from the Project to the H Street Transit Station.

Therefore, the proposed project would not conflict with existing or proposed bike and pedestrian facilities in its vicinity.

Transit Facilities

The H Street Transit Station is located in the 1,000 feet walkshed from the proposed project. There are no planned improvements for additional transit service on the west of I-5. There are no sidewalk gaps in the study area and pedestrians would have a direct connection between the proposed project and the H Street Transit Station via the existing sidewalks.

Therefore, as demonstrated above, consistency with the applicable plans addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, the project's impact would be **less than significant**.

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

The following discusses the proposed Project's VMT analysis and impact determination and its consistency with CEQA Guidelines Section 15064.3(b). The proposed project would be categorized under CEQA Guidelines Section

15064.3(b)(1), as a land use project, for the purpose of VMT analysis. The project's VMT analysis uses the guidelines contained within the City's TSG, which provides the screening criteria and methodology for VMT analysis. Projects that pass at least one screening criteria are generally expected to cause a less than significant impact without conducting a detailed VMT analysis. This is consistent with OPR's Technical Advisory which states that projects that meet the screening thresholds based on their location and project type may be presumed to result in a less-than-significant transportation impact (OPR 2018). Below is the screening criteria from the City's TSG which would apply to the proposed project:

Projects Located in a VMT-Efficient Area:

A VMT-efficient area is any area within the City with an average VMT per Capita or VMT per Employee below the thresholds as compared to the baseline regional average for the census tract it is located within, as shown in Appendix C of the City's TSG. For purposes for CEQA VMT analysis, "baseline" is determined using the Base Year of the current SANDAG travel demand forecasting model. All baseline average VMT is therefore the average VMT produced from the Base Year SANDAG model (i.e., year 2016 for the current model).

Industrial employment and employment[4] projects located within a VMT-efficient area may be presumed to have a less than significant impact absent substantial evidence to the contrary.

- A VMT-efficient area for industrial employment projects is any area with an average VMT per employee at or below the baseline regional average (i.e., at or below 18.90 VMT per employee) for the census tract it is located within.
- A VMT-efficient area for employment projects is any area with an average VMT per employee 15% below the baseline regional average (i.e., below 16.06 VMT per employee) for the census tract it is located within.

The City of Chula Vista screening maps which are consistent with the SANDAG VMT maps, were used in the VMT screening analysis of the proposed project. Figure 5.15-5 illustrates the project's census tract and the employee VMT summary. As shown in Table 5.15-2 Project VMT Summary, the proposed project (A, B1 and B2) is located in census tract 12600. The SANDAG average VMT per employee is 18.90 and the threshold of 85 percent would be 16.06 VMT per employee or below. The average VMT per employee of this tract is 15.91, which is below the regional average VMT per employee of 18.90 as well as below the VMT per employee threshold (i.e., 85 percent of the reginal mean) of 16.06. Therefore, it can be concluded that the proposed project is in a VMT efficient area for all employee uses. Because the proposed project would meet the screening criteria described above, a more detailed VMT analysis is not required, and can be presumed to result in a less than significant VMT impact.

Table 5.15-2. Project VMT Summary

Criteria	Value
SANDAG Regional Average VMT per Employee	18.90
VMT per Employee Threshold (85 percent of regional average)	16.06

[4] Transportation Study Guidelines Appendix D: Land Use Designations includes the following for employment related uses that pertain to the project:
Industrial employment: Industrial Park (no commercial), Industrial Plant (multiple shifts), Manufacturing/Assembly, Warehousing, Storage.
Commercial employment: Agriculture, Hospital-General/Convalescent/Nursing, Industrial/Business Park (commercial included), Science Research & Development, Hotel (with convention facilities/restaurants), Motel, Resort Hotel, Business Hotel, Military, Standard Commercial Office, Large (High-rise) Commercial Office, Office Park, Single Tenant Office, Corporate Headquarters, Government Offices primarily office with employees, Medical/Dental)

Table 5.15-2. Project VMT Summary

Criteria	Value
Project Census Tract (12600)	15.91
Project VMT above regional average or 85 percent of regional average	No
Potentially Significant Impact	**No**

Source: SANDAG VMT Screening Map.

Because the project screens out of a detailed VMT analysis and results in a less-than-significant impact under baseline conditions, the project's cumulative VMT impact can also be presumed to result in a less-than-significant VMT impact.

Therefore, the proposed project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b), and impacts would be **less than significant**.

Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No hazardous design features such as sharp curves or dangerous intersections exist on Project site or in the Project vicinity. Potential for increased hazards could result from geometric design features of the Project and/or as a result of the addition of Project traffic at driveways that would result in queuing of vehicles entering or exiting the Project.

Access to Planning Area B-1 would be provided five driveways along G Street and H Street, described below:

- West Project Driveway & G Street (Int #28): The project would construct south leg and install a stop control at the project driveway.
- Middle Project Driveway & G Street (Int #29): The project would construct south leg and install a stop control at the project driveway.
- East Project Driveway & G Street (Int #30): The project would construct south leg and install a stop control at the project driveway.
- Main Project Driveway & H Street (Int #31): The project would construct a north leg and install a stop control at the project driveway.
- Employee Project Driveway & H Street (Int #32): The project would construct north leg and install a stop control at the project driveway.

All project driveways along G Street and H Street would be full access driveways with the exception of the Employee Project Driveway along H Street, which would be restricted to right-in, right-out movements only. The final lane configuration and traffic control at site access driveways is subject to review and approval by City staff.

Access to Planning Area A and B-2, would be via following driveways, described below:

- Planning Area A Project Driveway & G Street (Int #36): The project would construct a south leg and install a stop control at the project driveway.
- Planning Area A Project Driveway & H Street (Int #37): The project would construct north leg, stop control, and restricted to right-in, right-out movements only at the project driveway.

An LOS analysis was conducted to evaluate the ability of the project to accommodate the anticipated traffic levels at the driveway access points under Existing, Opening Year, and Horizon Year conditions with and without the proposed project. As described in the LMA (Appendix K), all the driveway approaches along G and H Street are projected to operate at an acceptable LOS and would not substantially increase hazards related to queuing of vehicles entering or exiting the Project site under all conditions analyzed in the LMA. In addition, a signal warrant analysis was conducted for the unsignalized intersections to see if they would trigger the need for a traffic signal (Appendix K).

As shown in the LMA, the project would be fully responsible for signalizing the Bay Boulevard & G Street and Project Driveway & H Street intersections and retiming the signals at the I-5 Northbound Ramps & E Street, Bay Boulevard & H Street, I-5 Northbound Ramps & H Street, and I-5 Northbound and Southbound Ramps & J Street intersections. The Project would contribute its fair share towards the construction of a traffic signal or roundabout at the Bay Boulevard & F Street. The Project would contribute its fair share towards the construction of a traffic signal at the J Street and L Street intersections with Bay Boulevard. All proposed improvements would achieve LOS D or better conditions during both peak periods except for the roundabout at Bay Boulevard & F Street. The improvements identified in the LMA are recommendations and the final improvement plan and project funding responsibility will be defined and documented in a separate Rohr/Wohl Specific Plan Transportation Conditions of Approval memo.

As mentioned previously, sidewalks will be constructed along the Project's frontage of G and H Street. All Project driveways would be constructed to City's Design and Construction Standard Drawings (City of Chula Vista 2017) and include warning detectible strips at the curb returns. Within the Project site, all internal roadways would have appropriate widths and sidewalks on both sides of the roadway. Therefore, the Project would not increase hazards because of a geometric design feature or incompatible uses and impact would be **less than significant**.

Would the project result in inadequate emergency access?

Regional access to the Project site is provided by I-5 via its interchanges at E Street, J Street and H Street. Local access would be via Bay Boulevard, Marina Parkway, G Street and H Street. Access driveways for Planning Area B-1 would be located along G Street. Access driveways for Planning Area B-2 would be located along H Street and access driveways for Planning Area A would be located along both G Street and H Street. The proposed project would require construction of internal roadways, as well as improvements to existing intersections and project driveways concurrent with development of each Planning Area.

As mentioned in Wildfire discussion in Chapter 9, Effects Not Found to be Significant, the project site is not located within a designated Fire Hazard Severity Zone (CAL FIRE 2022). The City's fire protection and emergency medical services are provided by the Chula Vista Fire Department (CVFD). The nearest fire station to the site is Fire Station No. 1, located less than 1 mile from the site. The project site is located in the Bayfront area of the City with existing roadways on all sides and no adjacent wildlands or vegetative fuels. Additional, improvements to adjacent roadways and intersections as Planning Areas are developed would ensure adequate traffic operation and emergency access for the future land uses proposed and would be designed based on the City's codes and regulations.

All internal roadways would be built to meet all minimum fire apparatus access requirements of the CVFD and California Fire Code. Consistent with City's Engineering Standards, the Project's roadways would be required to meet all access requirements such as roadway widths, all-weather surface requirements, length of streets, turning requirements, grade restrictions, maintenance requirements, and parking restrictions. Specific fire and life safety requirements would be addressed at the building permit phase when architectural plans are submitted for City review and approval. Adequate emergency access and compliance with emergency access and design standards

would be ensured through this review by the City and responsible emergency service agencies throughout Project implementation. Because the Project's access points and driveways would be designed in accordance with City standards, the proposed project would be accessible to emergency responders during construction and operation of the Project. During construction, for any work in the public right-of-way or City easement that requires closing any vehicle/bicycle travel lane(s), closing the sidewalk, and/or restricting on-street parking prior to starting any work, temporary traffic control plans will be prepared and implemented per the City's Department of Engineering & Capital Projects Directives & Procedures.

Therefore, impacts associated with inadequate emergency access would be **less than significant**.

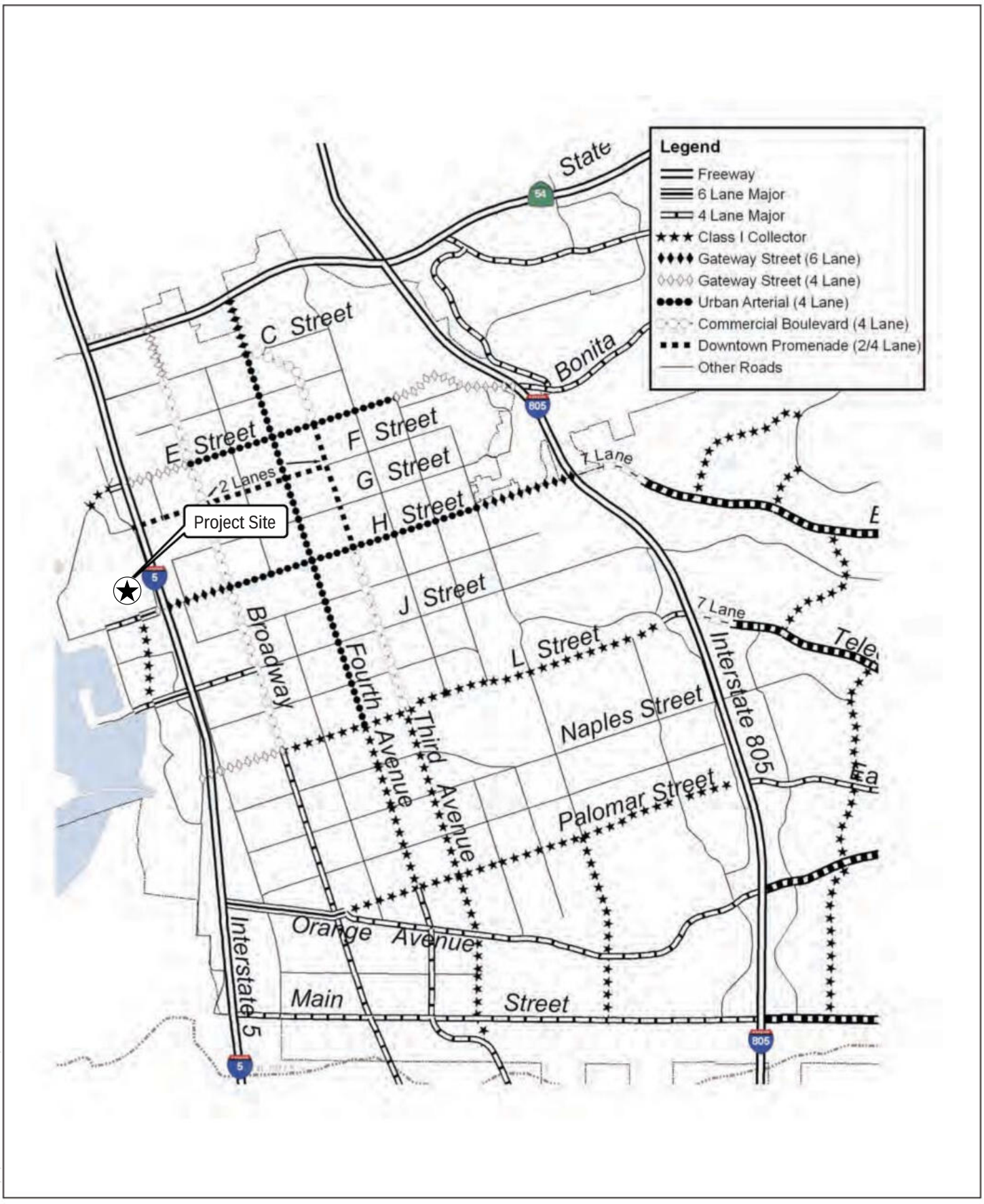
5.15.6 Level of Significance Prior to Mitigation

Impacts related to transportation would be **less than significant.**

5.15.7 Mitigation Measures

Impacts related to transportation would be **less than significant.** No mitigation measures are required.

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SOURCE: City of Chula Vista

FIGURE 5.15-1

Circulation Plan Roadways

Rohr Wohl Specific Plan

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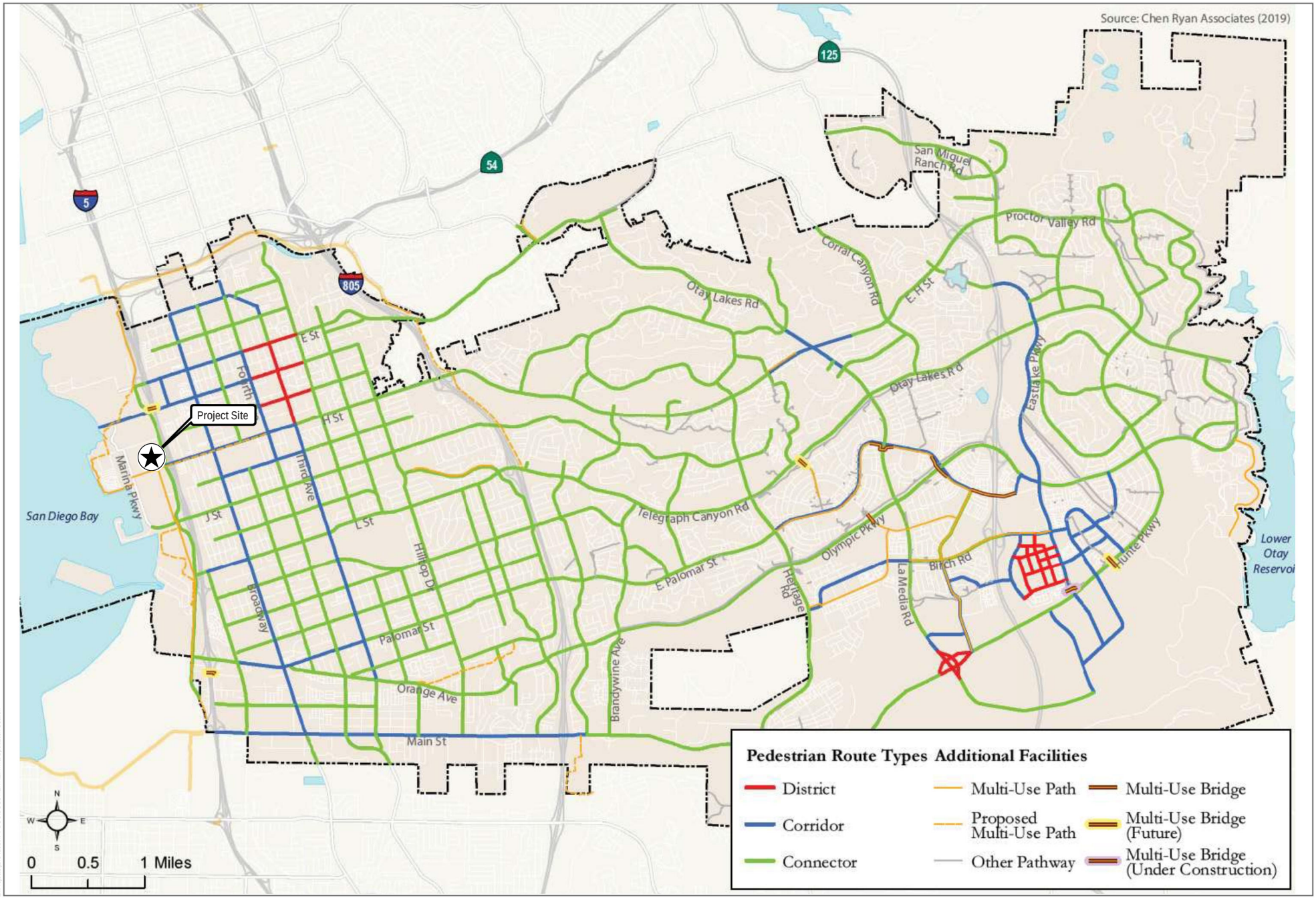


FIGURE 5.15-2

Pedestrian Route Types

Rohr Wohl Specific Plan

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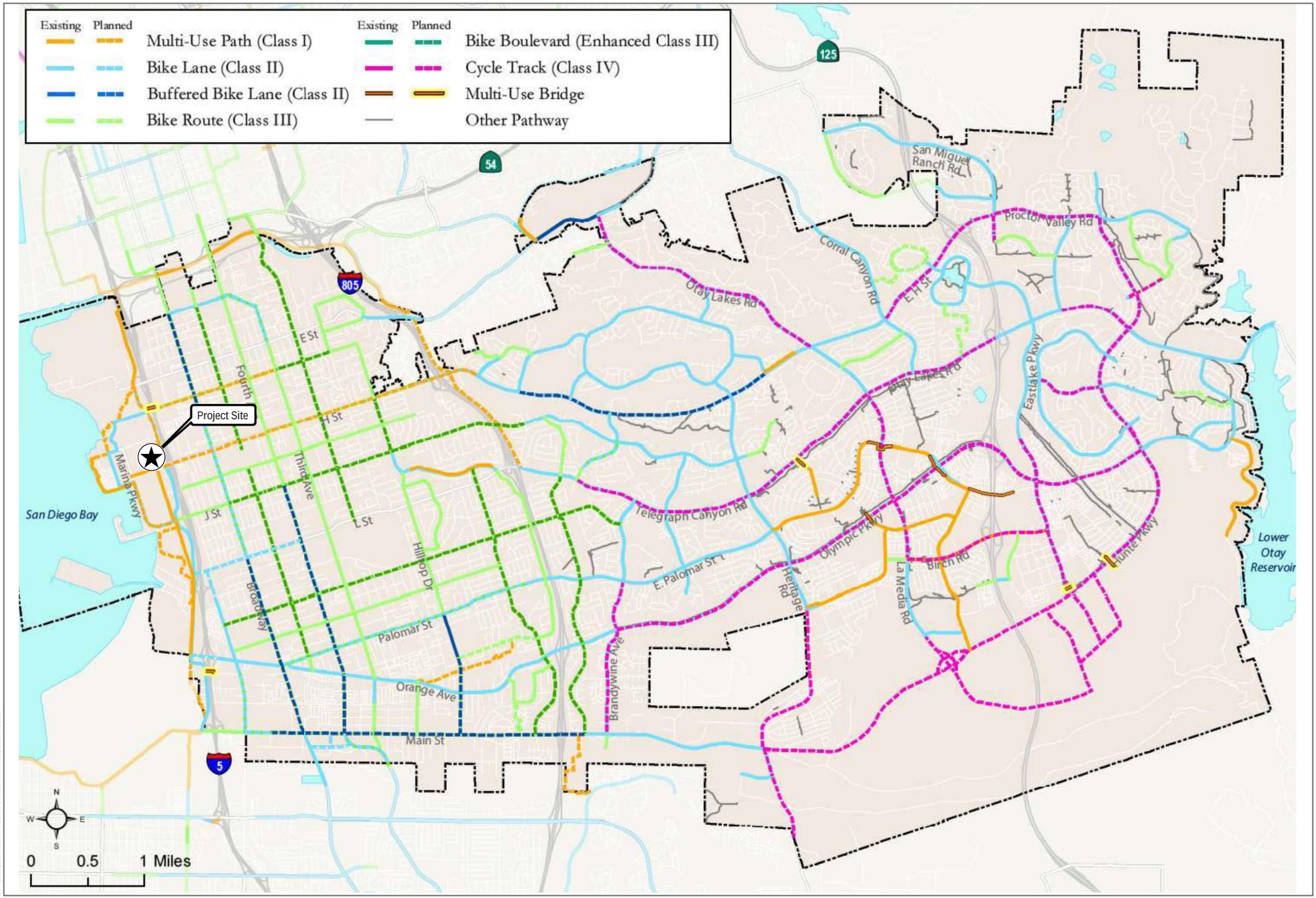


FIGURE 5.15-3

Existing and Planning Bike Facilities

Rohr Wohl Specific Plan

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SOURCE: SANGIS 2023

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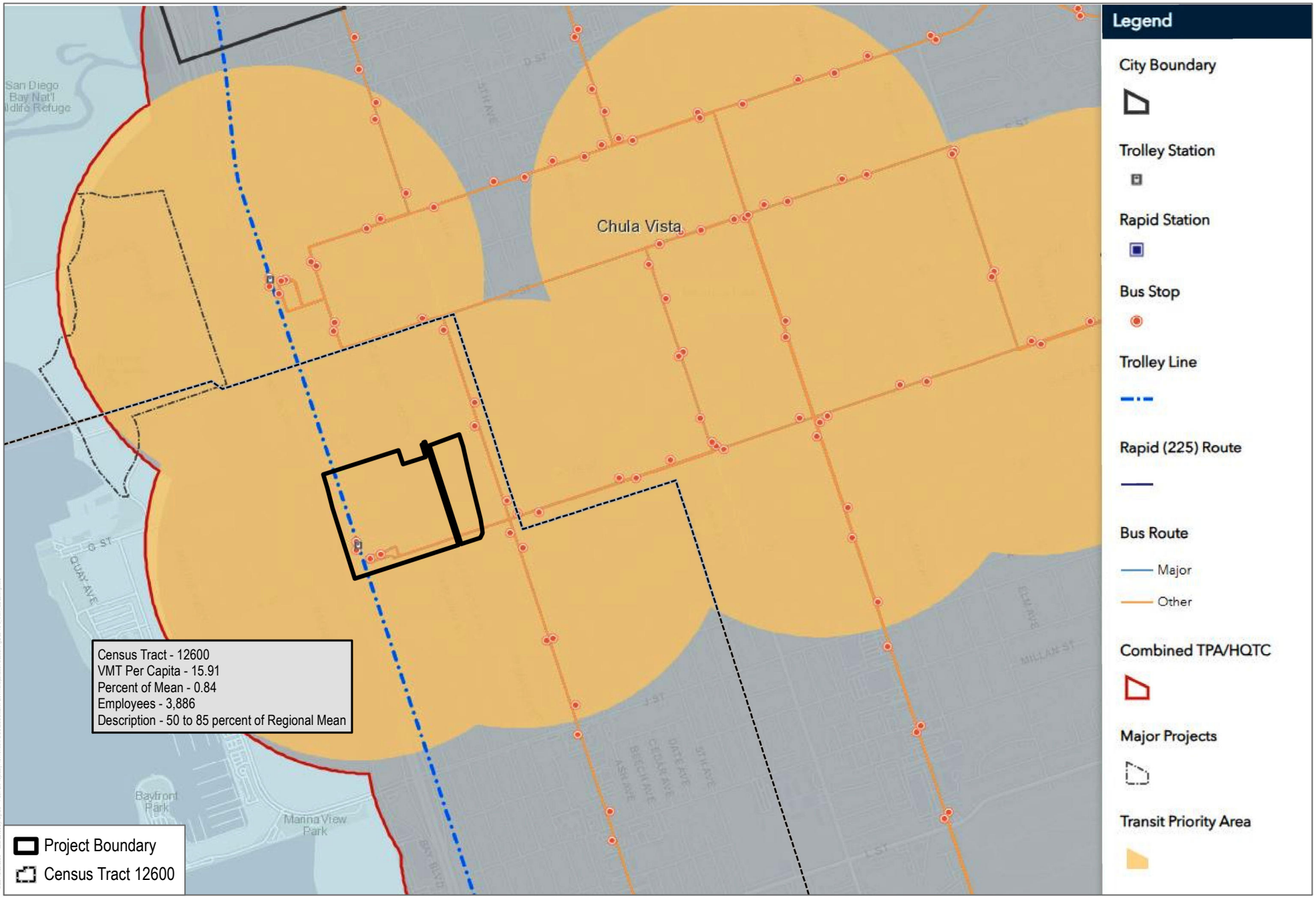
0 0.25 0.5 Miles

FIGURE X

Transit Facilities within Half-Mile of the Project

Rohr Wohl Specific Plan

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SOURCE: San Diego Unified Port District; City Chula Vista; SANGIS; VMT Screening Tool

DUDEK

FIGURE 5.15-5

VMT Screening Map for Project

Rohr Wohl Specific Plan

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5.16 Utilities and Service Systems

This section describes the existing setting related to utilities and service systems that would serve the proposed Rohr Wohl Specific Plan Project (project or proposed project) and evaluates potential impacts to utilities and service systems due to the implementation of the proposed project.

The discussion below is based on the following studies:

- Appendix I – Preliminary Drainage Report and Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP), prepared by Project Design Consultants.
- Appendix L1 – Water Report prepared by Dexter Wilson Engineering.
- Appendix L2 – Sewer Report prepared by Dexter Wilson Engineering.
- Appendix L3 – Water Supply Assessment prepared by Sweetwater Authority

5.16.1 Existing Conditions

5.16.1.1 Regulatory Framework

Federal

Federal Clean Water Act

The Federal Water Pollution Control Act (also known as the Clean Water Act) is the principal federal statute that addresses water resources. The statute employs a variety of regulatory and non-regulatory tools to reduce direct pollutant discharges into waterways, finance municipal wastewater treatment facilities, and manage polluted runoff. The broad goal is to restore and maintain the chemical, physical, and biological integrity of the nation's waters so that they can support "the protection and propagation of fish, shellfish, and wildlife and recreation in and on the water." Section 402 of the Clean Water Act authorizes the National Pollutant Discharge Elimination System (NPDES) permit program that covers point sources of pollution discharging to a water body. The NPDES program also requires operators of construction sites 1 acre or larger to prepare a stormwater pollution prevention plan for construction activities and obtain authorization to discharge stormwater under a NPDES construction stormwater permit.

Federal Safe Drinking Water Act

The Safe Drinking Water Act authorizes the U.S. Environmental Protection Agency (EPA) to set national health-based standards for drinking water to protect against both naturally occurring and human-made contaminants that may be found in drinking water. EPA, states, and water systems work in collaboration to ensure the standards are met.

National Pollutant Discharge Elimination System Permit Program

The NPDES permit program was established in the Clean Water Act to regulate municipal and industrial discharges to surface waters of the United States. Discharge from any point source is unlawful unless the discharge is in compliance with an NPDES permit. Federal NPDES permit regulations have been established for broad categories of discharges, including point-source municipal waste discharges and nonpoint-source stormwater runoff. NPDES permits generally identify effluent and receiving water limits on allowable concentrations and/or mass emissions

of pollutants contained in the discharge; prohibitions on discharges not specifically allowed under the permit; and provisions that describe required actions by the discharger, including industrial pretreatment, pollution prevention, self-monitoring, and other activities.

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (40 CCR, Section 268, Subpart D), contains regulations for municipal solid waste landfills and requires states to implement their own permitting programs that include federal landfill criteria. The federal regulations address the location, operation, design, and closure of landfills, as well as groundwater monitoring requirements.

Integrated Waste Management Act of 1989 (AB 341)

The Integrated Waste Management Act of 1989 requires each city, county, and regional agency to develop a source reduction and recycling element of an integrated waste management plan that includes source reduction, recycling, and composting components. A minimum of a 50% diversion rate of all solid waste from landfill disposal or transformation by January 1, 2000 was required and met. The current policy goal of the state is no less than 75% of solid waste generated be source reduced, recycled, or composted by the year 2020.

State

Urban Water Management Planning Act

In 1983, the Legislature enacted the Urban Water Management Planning Act (UWMP Act; California Water Code, Sections 10610–10656), which requires specified urban water suppliers within the state to prepare an Urban Water Management Plan (UWMP) and update it every 5 years. State and local agencies and the public frequently use UWMPs to determine if agencies are planning adequately to reliably meet water demands in various service areas. As such, UWMPs serve as an important element in documenting water supply availability and reliability for purposes of compliance with state laws, Senate Bills 610 and 221, which link water supply sufficiency to large land-use development project approvals. Urban water suppliers also must prepare UWMPs, pursuant to the UWMP Act, to be eligible for state funding and drought assistance.

The UWMP provides information on water usage, water supply sources, and water reliability planning within a specified water agency service area. It also may provide implementation schedules to meet projected demands over the planning horizon; a description of opportunities for new development of desalinated water; groundwater information (where groundwater is identified as an existing or planned water source); description of water quality over the planning horizon; and identification of water management tools that maximize local resources and minimize imported water supplies. Additionally, the UWMP evaluates the reliability of water supplies within the specified service area. This includes a water supply reliability assessment, water shortage contingency plan, and development of a plan in case of an interruption of water supplies.

The Metropolitan Water District (MWD), San Diego County Water Authority (SDCWA), and the Otay Water District (OWD) all play a role in supplying water to the proposed project. All of these agencies have prepared and updated UWMPs in accordance with the UWMP Act.

Senate Bills 610 and 221

On January 1, 2002, Senate Bill (SB) 610 took effect. SB 610, which was codified in the Water Code beginning with Section 10910, requires the preparation of a water supply assessment for projects within cities and counties that propose to construct 500 or more residential units or the equivalent. SB 610 stipulates that when environmental review of certain development projects is required, the water agency that is to serve the development must complete the water supply assessment to evaluate water supplies that are or will be available during normal, single-dry, and multiple-dry years during a 20-year projection to meet existing and planned future demands, including the demand associated with a proposed project.

SB 221, enacted in 2001 and codified in the Water Code, requires a city, county, or local agency to include a condition to any tentative subdivision map that a sufficient water supply shall be available to serve the subdivision. The term "sufficient water supply" is defined as the total water supplies available during normal, single-dry, and multiple-dry years within a 20-year projection that would meet the proposed subdivision project's projected water demand, in addition to existing and planned future water uses, including agricultural and industrial uses, within the specified service area. SB 221 further requires any verification of "projected" water supplies to be based on entitlement contracts, capital outlay programs and regulatory permits and approvals.

Sanitary Sewer General Waste Discharge Requirements

On May 2, 2006, the State Water Resources Control Board adopted a General Waste Discharge Requirement (Order No. 2006-0003) for all publicly owned sanitary sewer collection systems in California with more than 1.0 mile of sewer pipe. The order provides a consistent statewide approach to reducing sanitary sewer overflows by requiring public sewer system operators to take all feasible steps to control the volume of waste discharges into the system in order to prevent sanitary sewer waste from entering the storm sewer system, and to develop a Sewer System Management Plan. The General Waste Discharge Requirement also requires that storm sewer overflows be reported to the State Water Resources Control Board using an online reporting system.

Title 14: Natural Resources – Division 7

Title 14 of the California Code of Regulations regarding Natural Resources sets minimum standards for solid waste handling and disposal, including specific regulations regarding waste tire storage and disposal, hazardous waste disposal facilities, construction and demolition and inert debris transfer/processing, construction and demolition waste and inert debris disposal, transfer/processing operations and facilities, siting and design, operation standards, record keeping, and additional operating requirements for facilities. Additional guidance and requirements for compostable materials handling operations and facilities, asbestos handling and disposal, resource conservation programs, farm and ranch solid waste cleanup and abatement, used oil recycling program, electronic waste recovery and recycling, solid waste cleanup among others are also addressed in Title 14.

Title 27: Environmental Protection – Division 2, Solid Waste

Title 27 of the California Code of Regulations regarding Environmental Protection and Solid Waste set the criteria for all waste management units, facilities, and disposal sites including regulations of the California Integrated Waste Management Board (CIWMB) and State Water Resources Control Board (SWRCB). Waste classification, siting, construction standards, water quality monitoring and response programs, operating criteria, daily and immediate cover, handling and equipment, controls, gas monitoring and control, closure and post-closure standards, and financial assurances are all aspects covered in Title 27.

Assembly Bills 939 and 341: Solid Waste Reduction

The California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939) was enacted as a result of a national crisis in landfill capacity, as well as a broad acceptance of a desired approach to solid waste management of reducing, reusing, and recycling. AB 939 mandated local jurisdictions to meet waste diversion goals of 25% by 1995 and 50% by 2020, and established an integrated framework for program implementation, solid waste planning, and solid waste facility and landfill compliance. AB 939 requires cities and counties to prepare, adopt, and submit to the California Department of Resources Recycling and Recovery (CalRecycle) a source reduction and recycling element to demonstrate how the jurisdiction will meet the diversion goals. Other elements include encouraging resource conservation and considering the effects of waste management operations. The diversion goals and program requirements are implemented through a disposal-based reporting system by local jurisdictions under CIWMB regulatory oversight. Since the adoption of AB 939, landfill capacity is no longer considered a statewide crisis. AB 939 has achieved substantial progress in waste diversion, program implementation, solid waste planning, and protection of public health, safety, and the environment from landfills operations and solid waste facilities.

In 2011, AB 341 was passed, making a legislative declaration that it is the policy goal of the state that not less than 75% of solid waste generated be source reduced, recycled, or composted by the year 2020. AB 341 requires that local agencies adopt strategies that will enable 75% diversion of all solid waste by 2020. This bill requires all commercial businesses and public entities that generate 4 cubic yards or more of waste per week to have a recycling program in place. In addition, multifamily apartments with five or more units are also required to form a recycling program. At least one of the following actions are required:

- Source separate recyclable and/or compostable material from solid waste and either self-haul, subscribe to a recycling program through a waste hauler, and/or otherwise arrange for pick-up of the recyclable and/or compostable materials separately from the solid waste to divert them from disposal.
- Subscribe to a service that includes mixed waste processing alone or in combination with other programs, activities, or processes that divert recyclable and/or compostable materials from disposal and yield diversion results comparable to source separation.
- Property owners of commercial or multifamily complexes may require tenants to source separate their recyclable materials. Tenants must source separate their recyclable materials if required to by property owners of commercial or multifamily complexes.

California Code of Regulations Title 24, Part 11

In 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code, Part 11 of Title 24, is commonly referred to as CALGreen and establishes minimum mandatory standards as well as voluntary standards pertaining to the planning and design of sustainable site development, energy efficiency, water conservation, material conservation, and interior air quality. The CALGreen standards took effect in January 2011 and instituted mandatory minimum environmental performance standards for all new construction of residential and non-residential buildings. CALGreen standards are updated periodically. The latest version (CALGreen 2019) became effective on January 1, 2020. The Mandatory CALGreen standards pertaining to utilities and service systems include the following (24 CCR Part 11):

- Mandatory reduction in indoor water use through compliance with specified flow rates for plumbing fixtures and fittings.

- Mandatory reduction in outdoor water use through compliance with a local water-efficient landscaping ordinance or the California Department of Water Resources' Model Water Efficient Landscape Ordinance.
- Diversion of 65% of construction and demolition waste from landfills.
- Mandatory inspections of energy systems to ensure optimal working efficiency
- Inclusion of electric vehicle charging stations or designated spaces capable of supporting future charging stations

The CALGreen standards also include voluntary efficiency measures that are provided at two separate tiers and implemented at the discretion of local agencies and applicants. CALGreen's Tier 1 standards call for a 15% improvement in energy requirements, stricter water conservation, 65% diversion of construction and demolition waste, 10% recycled content in building materials, 20% permeable paving, 20% cement reduction, and cool/solar-reflective roofs. CALGreen's more rigorous Tier 2 standards call for a 30% improvement in energy requirements, stricter water conservation, 75% diversion of construction and demolition waste, 15% recycled content in building materials, 30% permeable paving, 25% cement reduction, and cool/solar-reflective roofs.

Local

Urban Water Management Plans

The UWMP Act requires that each urban water supplier providing water for municipal purposes, either to more than 3,000 customers, or more than 3,000 AF of water annually, must prepare, adopt, and update a UWMP at least once every 5 years on or before December 31, in years ending in five and zero. This applies to MWD, SDCWA, and its member agencies, including OWD, that serve unincorporated San Diego County. The intent of an UWMP is to present information on water supply, water usage/demand, recycled water, and water use efficiency programs in a respective water district's service area. The UWMP also serves as a valuable resource for planners and policy makers over a 25-year time frame.

The UWMP process ensures that water supplies are being planned to meet future growth. UWMPs are developed to manage the uncertainties and variability of multiple supply sources and demands over the long term. Water agencies and districts update their demand and supply estimates based on the most recent San Diego Association of Governments (SANDAG) forecast approximately every 5 years to coincide with preparation of their UWMPs. The most current supply and demand projections are contained in the 2020 UWMPs of MWD, SDCWA, and OWD (MWD 2021; SDCWA 2021; Sweetwater Authority 2021a). SDCWA member districts rely on the UWMPs and Integrated Resources Plans of MWD (MWD 2021) and the Regional Water Facilities Master Plan of SDCWA to document supplies available to meet projected demands.

Normal year, single-dry year, and multiple-dry year 2020 UWMP supply and demand assessments for MWD, SDCWA, and Sweetwater Authority are intended to describe the water supply reliability and vulnerability to seasonal or climatic conditions. Normal water years are considered to be years that experience average rainfall for the respective district. Single-dry water years are considered 1-year drought events. Multiple-dry water years refer to a series of below average rainfall for particular areas (i.e., multiple drought year conditions). Projections for multiple-dry years are made in 5-year increments.

In the 2020 UWMPs, MWD, SDCWA, and all SDCWA member agencies, including Sweetwater Authority, that serve unincorporated San Diego County have determined that adequate water supplies would be available to serve existing service areas under normal year, single dry year, and multiple dry year conditions through the year 2045.

City of Chula Vista General Plan

The Chula Vista General Plan recognizes that, in order to ensure adequate water service, water supplies and facilities need to be maintained and expanded in response to the City's projected population growth. The General Plan includes objectives and policies in the Public Facilities and Services Element that require development to plan for careful use of natural and man-made resources and services, and maximize opportunities for conservation while minimizing waste (Objective LUT 62); and increase efficiencies in water use through use of alternative technologies (Objective PFS 2). Additionally, the Housing Element includes Objective H 2 to promote efficient use of water through adopted standards and incentive-based policies to conserve limited resources and reduce long-term operational costs of housing. Growth Management Objective GM 1 and Policy GM 1.11 provide for withholding discretionary approvals and subsequent building permits from projects demonstrated to be out of compliance with applicable threshold standards for water service (City of Chula Vista 2005).

In addition, the City of Chula Vista General Plan recognizes that to ensure adequate and reliable sewer service and facilities, services need to be maintained and expanded to accommodate growth in the City's population. The Chula Vista General Plan includes objectives and policies in the Public Facilities and Services Element that increase efficiencies in wastewater generation and its reuse through use of alternative technologies (Objective PFS 2). Additionally, Growth Management Objective GM 1 and Policy GM 1.11 provide for withholding discretionary approvals and subsequent building permits from projects that are not in compliance with applicable threshold standards for wastewater service (City of Chula Vista 2005).

In 2005, the City of Chula Vista updated its General Plan and certified the related EIR for the General Plan Update. In 2013, the City certified a Supplemental EIR (City of Chula Vista 2012), and approved a General Plan Amendment/General Development Plan Amendment (GPA/GDPA). The GPA/GDPA Supplemental EIR (City of Chula Vista 2012) assessed, at the General Plan level, water demands and long-term water supply availability and reliability. The City concluded that a long-term water supply could not be guaranteed; and, therefore, increases in water demand projected in the General Plan and later Amendment would result in a significant unavoidable impact.

The result of the City's findings is that large-scale proposed development projects within the City must conduct a project-level water supply/demand analysis, accompanied by the required SB 610/SB 221 water supply assessment/verification. Based on this project-level water supply/demand analysis and associated project EIR, the City will then reassess its General Plan-level water supply findings and determinations based on the record before it.

The General Plan forecasts that the future solid waste disposal needs of the City may require the creation of a regional transfer station, where solid waste from individual collection routes would be transferred into large trucks for disposal (City of Chula Vista 2005). As such, the policies are regional in nature and do not specifically address individual developments.

Chula Vista Landscape Water Conservation Ordinance

In response to the new State Water Conservation in Landscaping Act (AB 1881), which required cities and counties to adopt landscape water conservation ordinances by January 1, 2010, the City of Chula adopted the Landscape Water Conservation Ordinance (Chula Vista Municipal Code [CVMC], Section 20.12) in 2009 and was updated in 2015. This ordinance requires that the majority of new or rehabilitated landscapes be designed using a water budget, to help encourage outdoor water conservation. As a part of the City's permitting process, some projects will be required to complete either a Landscape Documentation Package or a WaterSmart Checklist. In general, the Landscape Documentation Package will be prepared for larger projects that involve installing or changing an

existing landscape, while the WaterSmart Checklist is designed for smaller projects. The size of the "landscape area" will determine which of these documents will be required. The landscape area is measured in square feet, and it is an area with outdoor plants, turf and other vegetation that uses water, including any water features either in an area with vegetation or that stand alone (CVMC, Section 20.12).

City of Chula Vista Wastewater Master Plan

The City of Chula Vista Wastewater Collection System Master Plan (City of Chula Vista 2014) provides a comprehensive review and evaluation of the City of Chula Vista's wastewater collection, conveyance, and treatment capacity requirements under the existing (2012) and ultimate (2050) conditions. Based on findings of the evaluation, the City's Wastewater Collection System Master Plan recommends facility improvements and financing alternatives to ensure that aging infrastructure remains serviceable and to allow for the continued build out of the General Plan. Currently, wastewater generation within the City of Chula Vista is collected by City-owned facilities and conveyed to connections to the City of San Diego's Metropolitan Wastewater Department (METRO) conveyance and treatment facilities for treatment and disposal. As of 2014, the City's capacity at METRO is 20.864 million gallons per day (mgd). Future City flow projections based on current growth projections indicate that this capacity may be exceeded within the next 10-15 years. As such, the wastewater generation analysis presented in the Wastewater Master Plan is intended to be used by the City to establish a basis for acquiring future METRO treatment capacity to allow for implementation of the Chula Vista General Plan, as adopted in 2005 and amended in 2012.

Chula Vista Municipal Code

Chula Vista Municipal Code, Section 19.09.040G, requires "that sewage flows and volumes shall not exceed City engineering standards as set forth in the subdivision manual." In addition, the City must annually provide Metro with a 12- to 18-month development forecast and request confirmation that the projection is within the City's purchased capacity rights and an evaluation of Metro's ability to accommodate the forecast and continuing growth.

Construction and Demolition Debris Recycling Ordinance

Effective July 1, 2008, construction and demolition projects are required to divert their debris from landfill disposal in the City of Chula Vista; 100% of inert materials (i.e., concrete, rock, landscape debris) and a minimum of 50% of all other materials (i.e., Cabinets, carpet, drywall, etc.) shall be recycled and or reused from certain 'covered' projects. Covered projects are those with an approved Waste Management Report and submitted performance deposit. The Construction and Demolition Debris Recycling Ordinance (CVMC Section 8.25.095) is designed as a means of achieving compliance with California Green Building Standards Code (Title 24, Part II, Sections 4.408 and 5.408).

City of Chula Vista Recycling and Solid Waste Planning Manual

The State of California has mandated that at least 75% of the solid waste generated be diverted from landfills. Therefore, each applicant of a development, subdivision, or major construction project (including new public facilities) is required to allocate adequate space and provide facilities to house the equipment necessary for recycling and trash services to be provided to all future residents. Such space allocation and facilities are to be illustrated within preliminary plans submitted to the city (i.e., Design Review process). Recycling and Solid Waste Plans are subject to approval by the City Manager or designee (City of Chula Vista 2022).

5.16.1.2 Existing Setting

Water Service/Infrastructure

The Sweetwater Authority would provide water service to the proposed project area. As stated in the UWMP, local sources have met approximately 45 percent of the water needs within the Authority's service area, while the 55 percent balance has been met with imported water purchased from SDCWA. As a member agency of SDCWA, the Authority is entitled to directly purchase water from SDCWA on a wholesale basis. The percentage of local to imported water can vary greatly year to year due to local rainfall amounts.

The Sweetwater Authority owns and operates two storage reservoirs known as Sweetwater Reservoir and Loveland Reservoir, which are used to divert and retain water from the Sweetwater River. During wet years when Sweetwater and Loveland Reservoirs are at or near full capacity, they are capable of providing up to a two-year supply to the Sweetwater Authority's customers. The Sweetwater Authority does not produce or distribute recycled water, nor does it collect or treat wastewater. Additionally, the Sweetwater Authority does not currently have plans to implement new water supply projects within its service area.

Figure 5.16-1 shows the existing water supply infrastructure in the vicinity of the project site. The Sweetwater Authority's public water system includes a 12-inch water line in Bay Boulevard along the east side of the project site, a 12-inch water line in G Street along the north side of the site, and a 16-inch water line in H Street on the south side of the site. These existing water lines are within the Sweetwater Authority 255 Pressure Zone system and are connected to the 18 million gallon Bonita Valley Reservoir located east of I-805 and south of Bonita Road.

Wastewater Service/Infrastructure

Sewer service to the project site would be provided by the City of Chula Vista. Figure 5.16-2 shows the existing sewer facilities in the vicinity of the project site. The City of Chula Vista public sewer system includes an 18-inch sewer line within Planning Area A, a 12-inch sewer line in G Street along the north side of the site, a 10-inch force main in G Street, and a 10-inch sewer line in Marina Parkway on the west side of the site. The on-site private sewer lines, laterals, and connection locations are in design development for the project.

These existing sewer lines are within the City of Chula Vista sewer system and are connected to the existing 78-inch San Diego Metro Interceptor Sewer line within Bay Boulevard. The existing sewer lines connect into the City of Chula Vista's CV-3 meter which monitors flows going into the Metro line.

Stormwater

With respect to Planning Areas B-1 and B-2, approximately 0.3 acres of off-site run-on occurs as sheetflow in the northeast portion of the site. Planning Area B is roughly split into northern and southern portions with respect to stormwater flow. The north half of the site is conveyed to a 36-inch storm drain on the north side of G Street, which in turn feeds into a 54-inch reinforced concrete pipe (RCP) and then into an existing slough northwest of the site. The slough is connected to San Diego Bay. The southern half of the site is conveyed to the southwest corner and into an existing 60-inch storm drain beneath H Street, which in turn feeds into a 72-inch and 84-inch RCP under H Street, followed by outlets directly into San Diego Bay at the Chula Vista Marina (Figure 5.9-1, Existing Drainage Conditions) (Appendix I).

Solid Waste

Republic Services provides solid waste pick up and disposal throughout the City of Chula Vista and would also service the project site. Solid waste is disposed of at either the Otay Landfill and Compost Facility located at 1700 Maxwell Road, City of Chula Vista, or the Sycamore Landfill 8514 Mast Boulevard, City of Santee. The Otay Landfill has a remaining capacity of 21,194,008 cubic yards and a max capacity of 61,154,000 cubic yards. The Otay Landfill has a cease operation date of 2030 (CalRecycle 2024a). The Sycamore Landfill has a remaining capacity of 113,972,637 cubic yards and a max capacity of 147,908,000 cubic yards. The Sycamore Landfill has a cease operation date of 2042 (CalRecycle 2024b).

Electricity, Natural Gas, and Telecommunication Facilities

Electricity would be provided to the site by San Diego Gas and Electric Company (SDG&E). SDG&E provides electric services to 3.7 million customers through 1.49 million electric meters located in a 4,100-square-mile service area that includes San Diego County and southern Orange County (SDG&E 2024). According to the California Energy Commission, demand forecasts anticipate that approximately 22.7 billion kWh of electricity will be used in SDG&E's service area in 2024 (CEC 2023). SDG&E also provides natural gas utility service to both residential and non-residential customers.

Regarding telecommunication facilities, existing infrastructure is available surrounding the project site that can provide telephone, cable TV, and internet service. These services would be available from a variety of providers.

There's an existing SDG&E easement that extends through Planning Area B-1 and SDG&E overhead pole lines adjacent to G Street. SDG&E also has two unused easements in the northeast corner of Planning Area B-1 and a 150-foot-wide easement along the east portion of Planning Area B-1 and B-2 which contains an overhead pole line and two underground high-voltage conduit banks.

5.16.2 Thresholds of Significance

The significance criteria used to evaluate the project impacts to utilities and service systems is based on the recommendations provided in Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.). A significant impact would occur if the project would:

A. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects.
B. Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.
C. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.
D. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.
E. Not comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

5.16.3 Impacts

Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Water Service/Infrastructure

As stated in Appendix L1, the estimated water demand for the proposed project is 84,718 gallons per day (gpd) average. Prior to demolition of the buildings in Planning Area B-1 and B-2 in 2023 (site was actively being used until 2020), water demand was estimated to be 70,417 gpd average. Thus, the increase in water demand is approximately 14,301 gpd average or 16.0 acre-feet/year. Prior to the renovations in Planning Area A, the water demand was estimated to be 32,370 gpd[1] and now that the renovations are complete, the water demand is estimated to be 20,902 gpd[2]. Therefore, Planning Area A would have a reduced water demand of 11,468 gpd compared to previous industrial uses.

With an existing 12-inch water line in G Street along the north side of the project site, and an existing 16-inch water line in H Street at the south side of the site, there is sufficient water flow and pressure to develop the project site. This is further supported by hydrant flow tests prepared by Sweetwater Authority. Two tests were conducted, one on the 12-inch water line in G Street and one on the 16-inch water line in H Street.

The hydrant flow test in G Street shows that a flow of 4,947 gallons per minute (gpm) can be supplied in the 12-inch water line with greater than 60 pounds per square inch (psi) residual pressure. The H Street hydrant flow test shows an analysis for 5,000 gpm flow with similar pressure results. This substantiates that a fire hydrant flow requirement of 5,000 gpm is achievable on the project site with appropriate fire system looping.

However, the City of Chula Vista Fire Department allows only a 25% reduction in the required fire flow for fire sprinklered buildings. Since some of the proposed buildings in Planning Area B-1 may be over 100,000 square feet, consideration may need to be given to the type of construction for these buildings so that the required fire flow does not exceed the ability of the existing water system.

With the ability to modify the type of construction of the larger buildings or configure an on-site fire protection system that will make use of both existing water lines in G Street and H Street, there is no need for off-site water pipeline improvements to provide water service to the project site. Impacts would be **less than significant**.

Wastewater Service/Infrastructure

As stated in Appendix L2, estimated sewage generation for the project site was determined based on the city of Chula Vista Wastewater Master Plan and the proposed land uses in B-1 and B-2. Estimated average dry weather flow sewage generation was determined to be 58,781 gpd. The estimated peak dry weather flow for the project is 82,293 gpd. The ratio of peak wet weather flow to peak dry weather flow is 1.85, resulting in an estimated peak wet weather flow of 152,242 gpd. Prior to the renovations in Planning Area A, the sewage generation flow was

1 Previous industrial warehouse in Planning Area A was 282,004 square feet; estimated water demand was 5,000 gpd/acre, for a total of 32,370 gpd total.

2 Newly renovated warehouse (Business Park Flex) in Planning Area A is 202,336 square feet (85% industrial and 15% office); estimated water demand is 4,500 gpd/acre, for a total of 20,902 gpd total.

estimated to be 4,609 gpd[3] and now that the renovations are complete, the sewer generation flow is estimated to be 3,785 gpd[4]. Therefore, Planning Area A would have a reduced sewer generation flow of 824 gpd compared to previous industrial uses.

Planning Areas A, B-1 and B-2 will convey their sewage through the existing public sewer lines or proposed on-site private sewer lines to the existing G Street Pump Station. The G Street Pump Station is slated to be upgraded in the near future. Approved plans (Drawing No. 21053-1) are dated December 19, 2022. The proposed project relies on the completion of the G Street Pump Station improvements and therefore the proposed project will not be able to obtain sewer service until the pump station upgrades are completed.

The Chula Vista Bayfront Master Plan – Technical Memorandum No. 2 Proposed Water and Sewer Evaluation, dated December 2016, is the most current document related to the existing flows going into the G Street Pump Station. In the Bayfront Master Plan, Table 4-6 shows that the existing plus proposed flows going to the G Street Pump Station total to an average flow of 0.482 mgd (335 gpm) and a peak wet weather flow of 1.294 mgd (899 gpm). The proposed flows estimated in the Bayfront Master Plan do not include sewage generation from the proposed project.

The existing and proposed flows calculated in the Bayfront Master Plan plus the estimated sewage generation from the proposed project results in an average flow of 0.541 mgd (376 gpm) and a peak wet weather flow of 1.45 mgd (1,007 gpm).

Per the City of Chula Vista Wastewater Master Plan, Section 4.1.2 – Lift Station Design Criteria, the "Lift Stations should be sized for the peak wet weather flow rate plus an additional 20% capacity to account for wear, miscellaneous debris, etc. that may reduce pumping performance." The peak wet weather flow including the proposed project, plus the 20% pumping capacity safety factor, results in a required pumping capacity of 1,208 gpm for the G Street Pump Station.

The G Street Pump Station upgrades result in an operating pumping capacity of 1,300 gpm which is greater than the calculated required pumping capacity for existing, proposed, and proposed project of 1,208 gpm. Thus, the new G Street Lift Station has sufficient capacity for the build-out of the proposed project. Wastewater infrastructure has the ability to transmit wastewater generated by the proposed project and no new or expanded infrastructure would be required. Impacts would be **less than significant**.

Stormwater

Based on the PDP SWQMP (Appendix I), the proposed site drainage conveyance network would include trench drains, grate inlets, B-Inlets, ribbon gutters, earthen swales in the westerly dispersion area, and storm drains. The majority of the site drainage would be collected and then directed to modular wetland units for water treatment. Stormwater runoff would enter the modular wetland units via pipe inflows and curb openings. One 3,130-square-foot biofiltration basin would be located at the northeast corner of the site (Figure 5.9-3, Proposed Drainage Conditions). The basin would be lined because the project geotechnical engineer determined the subsurface soils are not suitable for stormwater infiltration. The biofiltration basin would include 18 inches of engineered sandy loam, growing media on top of a minimum depth of 12 inches of gravel. In addition to these biofiltration layers, a

[3] Previous industrial warehouse in Planning Area A was 282,004 square feet; estimated sewer flow was 712 gpd/acre, for a total of 4,609 gpd total.

[4] Newly renovated warehouse (Business Park Flex) in Planning Area A is 202,336 square feet (85% industrial and 15% office); estimated sewer flow is 712 gpd/acre for industrial and 1,401 gpd for office, for a total of 3,785 gpd total.

barrier/filter layer would also be installed beneath the soil media, and above the gravel layer. The filter layer would include a 3-inch layer of washed sand on top of a 3-inch layer of #8 choking stone (Appendix I).

No other biofiltration basins are proposed due to subsurface soil contamination in other areas of the site, as well as shallow groundwater conditions (i.e., locally as shallow as 2 feet). As a result, vegetated modular wetland units would be installed to treat stormwater runoff across the majority of the site, in combination with two stormwater runoff dispersion areas and a biofiltration planter for stormwater retention. The volume retention requirements would be met on a composite basis rather than on a drainage management area basis. Harvest and re-use would not be feasible for this project. Proposed structural best management practices (BMPs) would be verified by the City at the completion of construction. PDP BMPs must be maintained into perpetuity. In addition, because the project proposes to treat an equivalent or larger amount of impervious surface due to treating the run-on, the perimeter areas of the site that could not be graded to drain to on-site treatment BMPs are addressed through a proposed treatment swap along the eastern portion of the property, as illustrated in Figure 5.9-3 (Appendix I).

The proposed loading docks would be depressed areas below the building finish floor and would include trench drains to collect stormwater runoff in those areas. Trench drains would also be used on the east side of the site, within the SDG&E easement. The project area east of the SDG&E easement drains is not proposed to be disturbed by the project. Rather, only re-striping is proposed in that area and that portion of the drainage area is considered run-on (Appendix I).

Similar to existing conditions, the site drainage would be roughly split north and south, with the north side being conveyed to the 36-inch stub, and then westerly transitioning to the 54-inch RCP, ultimately discharging into an existing slough northwest of the site. The slough is directly connected to San Diego Bay. Stormwater runoff on the south side of the site would be conveyed to the H Street 60-inch storm drain, and then southwesterly to an 84-inch RCP that outlets directly to San Diego Bay (Appendix I). The new on-site stormwater infrastructure would be adequate to serve the proposed project and impacts would be **less than significant**.

Electricity, Natural Gas, and Telecommunication Facilities

Regarding the existing SDG&E easements and facilities, the existing easement that extends through Planning Area B-1 would be quitclaimed during the development process. The overhead pole lines adjacent to G Street would be converted to underground conduits running beneath the sidewalk along the south side of G Street. The two unused easements in the northeast corner of Planning Area B-1 would also be quitclaimed. The 150-foot-wide easement along the east portion of Planning Area B-1 and B-2, which contains an overhead pole line and two underground high-voltage conduit banks, would remain and the project proposes to use this area as surface parking.

SDG&E would continue to provide electric and natural gas service to the project site as they did prior to demolition of the buildings. Regarding telecommunication facilities, existing infrastructure is available surrounding the project site that can provide telephone, cable TV, and internet service. These services would be available from a variety of providers. No new infrastructure or increase in capacity of existing infrastructure would be required in order to serve the proposed project. Impacts would be **less than significant**.

Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

As stated in Appendix L1, the estimated water demand for the proposed project is 84,718 gpd average. Prior to demolition of the buildings in Planning Area B-1 and B-2 in 2023, water demand was estimated to be 70,417 gpd

average. Thus, the increase in water demand is approximately 14,301 gpd average or 16.0 acre-feet/year. Prior to the renovations in Planning Area A, the water demand was estimated to be 32,370 gpd[5] and now that the renovations are complete, the water demand is estimated to be 20,902 gpd[6]. Therefore, Planning Area A would have a reduced water demand of 11,468 gpd compared to previous industrial uses.

From the Sweetwater Authority's Water Distribution System 2020 Master Plan, the annual water production for the year 2020 was 16,941 acre-feet (Sweetwater Authority 2021b). Thus, the additional water demand estimated for the proposed project is 0.09% of the total water production for the Sweetwater Authority. This additional water supply is expected to be accounted for in the typical increase in normal growth in the Sweetwater Authority service area, as well as in the updated projections which Sweetwater Authority makes as part of its 5-year update of its UWMP. As stated in Sweetwater Authority's UWMP, the projections show that they anticipate having adequate water supplies during normal years, single dry-years, as well as multiple dry-year periods through 2045. If supply limitations arise in multiple dry-year scenarios, they will be addressed through implementation of extraordinary water conservation measures (Sweetwater Authority 2021a).

As indicated in Appendix L3, Water Supply Assessment, prepared by Sweetwater Authority for the proposed project, there will be sufficient water supplies, over a 20-year planning horizon, to meet the projected demands of the proposed project, in addition to existing and planned future users, including agricultural and manufacturing uses, under normal, single dry-year, and multiple dry-year scenarios.

As previously stated, the additional demand generated by the proposed project is expected to be accounted for in the typical increase in normal growth in the Sweetwater Authority service area. Therefore, sufficient water supplies are available to serve the project and impacts would be **less than significant**.

Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

San Diego Metropolitan Sewer System

The City of Chula Vista is a participating member of the City of San Diego owned and operated METRO system. The system includes regional sewer interceptors and trunk sewers, lift stations, and treatment and disposal facilities. Each participating agency of the METRO system has capacity rights that dictate how much they can contribute to the system each day. The most current agreement for capacity rights pertaining to the METRO system is the Amended and Restated Regional Wastewater Disposal Agreement Between the City of San Diego and the Participating Agencies in the Metropolitan Sewerage System, signed July 23, 2021. Per Exhibit B of the agreement, the City of Chula Vista has a capacity of 20.864 mgd average flow in the METRO system.

The City of Chula Vista Wastewater Master Plan, Table 3-6, presents wastewater flow projections through the Year 2050. The projected average flow in Year 2050 is 29.89 mgd; this exceeds the current capacity which the City of Chula Vista has in the METRO system. Table 7-7 in the Master Plan identifies that additional capacity will be required for the City of Chula Vista starting in the Year 2027.

5 Previous industrial warehouse in Planning Area A was 282,004 square feet; estimated water demand was 5,000 gpd/acre, for a total of 32,370 gpd total.

6 Newly renovated warehouse (Business Park Flex) in Planning Area A is 202,336 square feet (85% industrial and 15% office); estimated water demand is 4,500 gpd/acre, for a total of 20,902 gpd total.

Estimating that the proposed project will be generating sewage sometime in the Year 2025 suggests that the City of Chula Vista presently has sufficient capacity to accommodate the expected average flow of 58,781 gpd (0.06 mgd) from the proposed project. If new development exceeds the rate of increase in sewage flows in Chula Vista, then the City will have to obtain additional sewage capacity in METRO sooner than Year 2027. In either scenario, sewage capacity in METRO will be available for the proposed project.

Overall, the city of Chula Vista has available sewer capacity for the proposed project both in the upgraded G Street Pump Station and in the METRO sewer system. Impacts would be **less than significant**.

Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

The solid waste generated during construction would primarily consist of discarded materials and packaging generated by the construction process. The proposed project would adhere to California Green Building Standards Code (CALGreen) Section 5.408.1, which requires a minimum of 65% of non-hazardous construction waste to be recycled or salvaged for reuse. Additionally, the project site is currently vacant, and no buildings would be demolished during construction, further minimizing waste generated during construction. Therefore, construction of the proposed project would not generate solid waste in excess of applicable standards or in excess of the capacity of local infrastructure.

As stated above, Republic Services provides solid waste pick up and disposal throughout the City of Chula Vista and would also service the project site. Solid waste is disposed of at either the Otay Landfill and Compost Facility located at 1700 Maxwell Road, City of Chula Vista, or the Sycamore Landfill 8514 Mast Boulevard, City of Santee. The Otay Landfill has a remaining capacity of 21,194,008 cubic yards and a max capacity of 61,154,000 cubic yards. The Otay Landfill has a cease operation date of 2030 (CalRecycle 2024a). The Sycamore Landfill has a remaining capacity of 113,972,637 cubic yards and a max capacity of 147,908,000 cubic yards. The Sycamore Landfill has a cease operation date of 2042 (CalRecycle 2024b).

Table 5.16-1 Solid Waste Generation Estimate

Land Use	Area, sq. ft.	Solid Waste Generation Factor[1]	Average Solid Waste (lb/day)
Planning Area A			
Footprint	202,336	—	—
Office	30,350	6 lb/1,000 sq. ft./day	182
Industrial	171,986	62.5 lb/1,000 sq. ft./day	10,749
Planning Area B-1			
Footprint	463,750	—	—
Office	53,664	6 lb/1,000 sq. ft./day	322
Industrial	410,086	62.5 lb/1,000 sq. ft./day	25,630
Planning Area B-2			
Retail	52,210	2.5 lb/1,000 sq. ft./day	131
Office	7,387	6 lb/1,000 sq. ft./day	44
Hotel	175 Rooms	2 lb/room/day	34
		Total	**37,092**

Note:
[1] https://www2.calrecycle.ca.gov/wastecharacterization/general/rates

Based on the proposed land uses in Planning Areas B-1 and B-2, it is estimated that solid waste generation would be approximately 37,092 pounds per day (Table 5.16-1). Using the EPA's weight conversion chart for commercial/industrial waste of 450 pounds/cubic yard, the project would generate approximately 82 cubic yards of solid waste per day and 29,930 cubic yards per year (EPA 1997). This represents 0.1% of the remaining capacity at the Otay Landfill and 0.03% of the remaining capacity at the Sycamore Landfill. It should be noted that these estimates do not take into consideration required recycling and diversion programs.

The project would be required to comply with applicable state and local regulations related to solid waste, waste diversion, and recycling at the time of development. No demolition activities are required prior to construction that would generate additional construction-related waste. Additionally, the project would participate in the City's recycling programs, which would further reduce solid waste sent to Otay or Sycamore Landfill. Based on the annual estimates, existing landfill capacity would be able to accommodate the solid waste generated by the proposed project. Impacts would be **less than significant**.

Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

As previously stated, implementation of the project would not generate solid waste in excess of the capacity of local infrastructure. The project would comply with Chapter 13 of the City Municipal Code requiring residents and businesses to separate all recyclable material from other solid waste. The project would also comply with California AB 341 directing mandatory recycling for all business generating four or more cubic yards of waste and multifamily projects with five or more units. Additionally, the project would implement solid waste reduction policies of the General Plan and the CVMC Section 8.25 which would minimize the project's solid waste generation. n. The General Plan Public Facilities Element contains several policies intended to efficiently handle solid waste disposal throughout the City, encourage the reduction of waste generation, and promote waste diversion from landfills. CVMC Section 8.25.095 requires construction and demolition debris recycling including submittal of construction and demolition waste management report forms that demonstrate how the applicant would comply with diversion requirements. Based on project compliance and implementation of General Plan policies and CVMC requirements, solid waste would be diverted from the landfill to the maximum extent feasible.

The proposed project would comply with the state and City regulations, providing enclosures with adequate space for collection, storage, and separation of all recyclable materials in full compliance with City standards. This includes food waste, food-solid paper, green waste, landscaping and pruning waste, and non-hazardous wood waste. Therefore, compliance with federal, state, and local management and reduction statutes and regulations related to solid waste project impacts would be **less than significant**.

5.16.4 Level of Significance Prior to Mitigation

Impacts associated with utilities and service systems would be **less than significant** and no mitigation measures are required.

5.16.5 Mitigation Measures

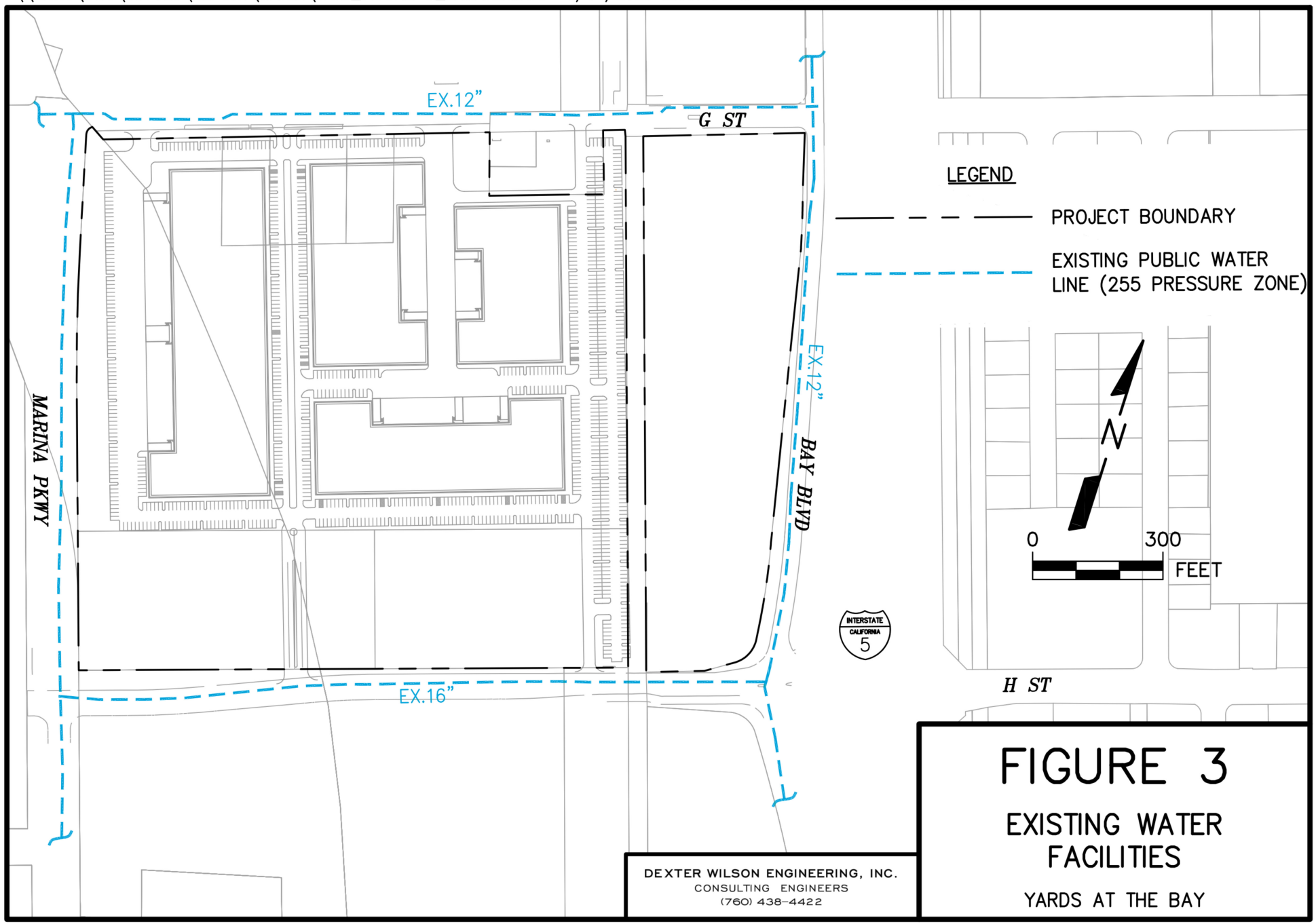
No mitigation measures are required.

5.16.6 Level of Significance After Mitigation

Impacts associated with utilities and service systems would be **less than significant**.

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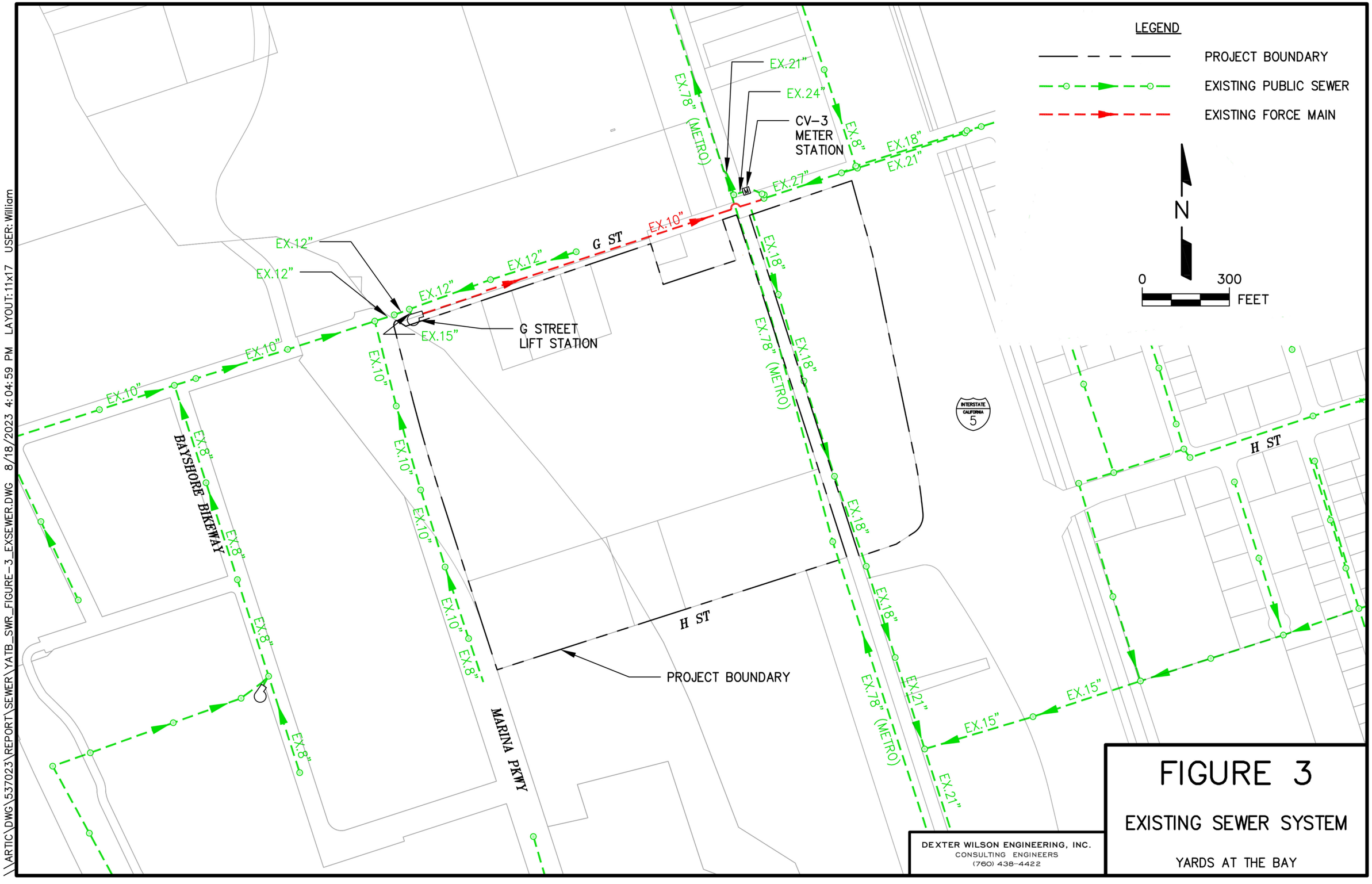
DEXTER WILSON ENGINEERING, INC.
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FIGURE 3

EXISTING WATER FACILITIES

YARDS AT THE BAY

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FIGURE 3

EXISTING SEWER SYSTEM

YARDS AT THE BAY

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6 Cumulative Impacts

6.1 Introduction

Although the environmental effects of an individual project may not be significant when that project is considered independently, the combined effects of several projects may be significant when considered collectively. Such impacts are referred to as "cumulative impacts." Section 15355 of the California Environmental Quality Act (CEQA) Guidelines defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." Section 15130 of the CEQA Guidelines provides guidance for analyzing significant cumulative impacts in an environmental impact report (EIR). According to this section of the CEQA Guidelines, the discussion of cumulative impacts "need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by standards of practicality and reasonableness." The discussion should also focus only on significant effects resulting from a project's incremental effects and the effects of other projects. According to Section 15130(a)(1), "an EIR should not discuss impacts which do not result in part from the project evaluated in the EIR."

Cumulative impacts can occur from the interactive effects of a single project. For example, the combination of noise and dust generated during construction activities can be additive and can have a greater impact than either noise or dust alone. However, substantial cumulative impacts more often result from the combined effect of past, present, and future projects located in proximity to the project under review. Therefore, it is important for a cumulative impacts analysis to be viewed over time and in conjunction with other related past, present, and reasonably foreseeable future developments whose impacts might compound or interrelate with those of the project under review.

6.2 Methodology

According to Section 15130(b) of the CEQA Guidelines, cumulative impact analysis may be conducted and presented by either of two methods: (1) a list of past, present, and probable activities producing related or cumulative impacts, or (2) a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document that has been adopted or certified that described or evaluated regional or area-wide conditions contributing to the cumulative impact. Other than for air quality, greenhouse gas emissions, noise, and transportation/traffic, the cumulative list approach has been used in the cumulative analysis presented in this chapter, as discussed below. Air quality, greenhouse gas emissions, noise, and transportation/traffic cumulative impacts were evaluated using the summary of projections method because impacts can only be analyzed on a broad, area-wide scope, and in a cumulative context. Table 6-1 describes the geographic scope of the cumulative impact analyses.

CEQA requires an EIR include an analysis of cumulative impacts. The purpose of this section of the EIR is to explain the methodology for the cumulative analyses and present the potential cumulative effects of the Modera Melrose Mixed-Use Development Project (project or proposed project).

Section 15355 of the CEQA Guidelines defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." Section 15130 of the CEQA Guidelines provides guidance for analyzing significant cumulative impacts in an EIR. The discussion of cumulative impacts "need not provide as great detail as is provided for the effects attributable to the

project alone," but instead is to be "be guided by standards of practicality and reasonableness" (Guidelines Section 15130[b].) The discussion should also focus only on significant effects resulting from the project's incremental effects and the effects of other projects. According to Section 15130(a)(1), "an EIR should not discuss impacts which do not result in part from the project evaluated in the EIR."

Cumulative impacts can result from the combined effect of past, present, and future projects located in proximity to the project under review. Therefore, it is important for a cumulative impacts analysis to be viewed over time and in conjunction with other related past, present, and reasonably foreseeable future developments whose impacts might compound or interrelate with those of the project under review.

6.3 Cumulative Projects

Based on information provided by the City of Chula Vista (City) and the cumulative projects used in the Local Mobility Analysis (Appendix K), a list of cumulative projects under consideration for this analysis is presented in Table 6-1 and on Figure 6-1.

Table 6-1. Cumulative Projects

Project Name	Type of Development	Project Size	Status
1. Gaylord Hotel	Hotel	1,600 Rooms	Under Construction
2. Sun Communities RV Park, Phase II	RV Park	90 Spaces	Complete
3. Amara Bay	Multi-Family	1,500 Units	Under Construction
4. 390 Bay Boulevard (MPA22-0023)	Industrial Demolition/Soil Remediation	Demolition 60,000 square feet.	Demolition complete, soil remediation underway
5. 795 H Street (MPA21-0022)	Industrial Demolition/Soil Remediation	Demolition 194,227 square feet.	Demolition complete, soil remediation underway
6. Collins Campus (DR19-0006)	Office/Industrial	Expansion of two existing buildings.	Design Review

Source: Appendix K.

6.4 Cumulative Impact Analysis

6.4.1 Aesthetics

Projects contributing to a cumulative aesthetic impact include those within the project viewshed. The viewshed encompasses the geographic area within which the viewer is most likely to observe the proposed project and surrounding uses. Typically, this is delineated based on topography, as elevated vantage points, such as from scenic vistas, offer unobstructed views of expansive visible landscapes. Cumulative aesthetic impacts would occur if projects combine to result in substantial adverse impacts to the visual quality of the environment and/or increase sources of substantial lighting and glare.

As described in Section 5.1, Aesthetics, implementation of the Rohr Wohl Specific Plan and future development on the project site would be consistent with identified aesthetics-related policies of the Chula Vista General Plan,

potential conflicts with existing regulations governing scenic quality are not anticipated, and impacts would be less than significant. Cumulative projects No. 1 and No. 3 would be visible from the project site and together with the proposed project the visual character of the bayfront would be different; however, these projects were contemplated as part of the Chula Vista Bayfront Master Plan and visual impacts were addressed in the EIR for the Master Plan. Cumulative projects No. 4 and 5 are on the project site and the buildings have already been demolished. Future development on the project site would be guided by the Design Guidelines established in the Specific Plan and with implementation of existing regulations and the Chula Vista Municipal Code, the proposed project would not result in substantial alteration to the existing or planned character of the area. The project's contribution to a cumulatively considerable aesthetic impact is negligible.

6.4.2 Air Quality

Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the San Diego Air Pollution Control District (SDAPCD) develops and implements plans for future attainment of the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS). Based on these considerations, project-level thresholds of significance for criteria pollutants are relevant in the determination of whether the Project's individual emissions would have a cumulatively significant impact on air quality. In analyzing cumulative impacts from a project, the analysis must specifically evaluate the project's contribution to the cumulative increase in pollutants for which the San Diego Air Basin (SDAB) is designated as nonattainment for the CAAQS and NAAQS. If the project does not exceed thresholds and is determined to have less than significant project-specific impacts, it may still contribute to a significant cumulative impact on air quality if the emissions from the project components, in combination with the emissions from other proposed or reasonably foreseeable future projects, exceed established thresholds. However, the project would only be considered to have a significant cumulative impact if its contribution accounts for a significant proportion of the cumulative total emissions (i.e., it represents a "cumulatively considerable contribution" to the cumulative air quality impact).

Additionally, for the SDAB, the Regional Air Quality Strategy (RAQS) serves as the long-term regional air quality planning document for the purpose of assessing cumulative operational emissions within the basin to ensure the SDAB continues to make progress toward NAAQS and CAAQS attainment status. As such, cumulative projects located in the San Diego region would have the potential to result in a cumulative impact to air quality if, in combination, they would conflict with or obstruct implementation of the RAQS. Similarly, individual projects that are inconsistent with the regional planning documents on which the RAQS is based would have the potential to result in cumulative impacts if they represent development beyond regional projections.

The SDAB has been designated as a federal nonattainment area for ozone (O_3) and a state nonattainment area for O_3, coarse particulate matter (PM_{10}), and fine particulate matter ($PM_{2.5}$). PM_{10} and $PM_{2.5}$ emissions associated with construction generally result in near-field impacts. The nonattainment status is the result of cumulative emissions from all sources of these air pollutants and their precursors within the SDAB. The mitigated construction emissions from the proposed project would not exceed the SCAQMD's volatile organic compound (VOC) thresholds of significance and impacts would be less than significant**.** Net operational emissions generated by the project would not result in emissions that exceed significance thresholds for any criteria air pollutant. Long-term operational air quality impacts would be less than significant and impacts would not be cumulatively considerable.

6.4.3 Biological Resources

As described in Section 5.3, Biological Resources, the project site consists of Tier IV habitats. Tier IV habitats are not considered significant and do not require mitigation. Special-status plant species were not documented within the study area and do not have a moderate or high potential to occur. However, due to the potential for special-status wildlife species to be present, in addition to nesting birds, mitigation measures MM-BIO1 through MM-BIO-5 would be implemented and would reduce impacts to less than significant.

The cumulative impacts associated with the proposed project include the potential long-term regional effects of the project in combination with other projects and conditions within the area. This includes consideration of potential effects on an ecosystem component or entire ecosystem on a regional scale. The City Multiple Species Conservation Program (MSCP) Subarea Plan is a part of the County of San Diego MSCP, which is a regional effort to counteract significant cumulative biological impacts. All development that is permitted through the city must comply with the MSCP. Because of this regional biological planning, cumulative biological impacts on most species in the region are not significant when developments are pursued in compliance with the plan. Because project avoidance and minimization measures will be pursued in a manner consistent with the City MSCP Subarea Plan, impacts to biological resources would not be cumulatively considerable.

6.4.4 Cultural Resources and Tribal Cultural Resources

As described in Section 5.4, Cultural Resources, the potential for intact cultural deposits to exist within native soils to the depths of proposed ground disturbance is unknown. In the event that unanticipated cultural resources are encountered during project implementation, impacts could be potentially significant, and mitigation measures (MM-CUL-1) would be required. The results of the records search did not identify the presence of any previously recorded archaeological sites within the project site. Cumulative projects No. 1 and No. 3 are already under construction and potential impacts to cultural resources were addressed in the EIR for the Chula Vista Bayfront Master Plan. Cumulative projects No. 4 and 5 are on the project site and the buildings have already been demolished. Cumulative project No. 2 is complete and any impacts to cultural resources would have been identified and handled appropriately as part of that project. Lastly, cumulative project No. 6 is an expansion of an existing facility on land that has already been paved or heavily disturbed. Careful treatment of any resources found on site, combined with similar protections elsewhere, would ensure that regional losses do not result in a cumulatively considerable impact on cultural resources.

6.4.5 Energy

Cumulative projects that could exacerbate the project's impacts include any projects that could result in wasteful, inefficient, or unnecessary use of energy. However, as demonstrated in Section 5.5, Energy, the project would not result in wasteful, inefficient, or unnecessary use of energy during construction or operation. Construction will result in short-term and temporary energy demands. Operation of the Project would not result in a wasteful, inefficient, or unnecessary use of energy or conflict with an applicable plan. Therefore, the project would have a less-than-significant impact with regards to cumulative energy impacts.

6.4.6 Geology and Soils

As described in Section 5.6, Geology and Soils, impacts associated with landslides, seismic ground shaking, expansive soils and erosion would be less than significant. However, development of the proposed project would

require excavations for building foundations and utilities, and any excavations into the potentially fossil-bearing strata within the Bay Point and San Diego Formations could result in potentially significant impacts to paleontological resources, and mitigation measure MM-GEO-1 would be required. Impacts would be reduced to less than significant.

Due to the localized nature of geology and soils, cumulative projects would address potential impacts to geology and soils on a project-by-project basis, as potential geologic hazards and soil composition varies by site. Each cumulative project would be required to assess individual and site-specific geologic conditions, which would inform construction and development of each site. All cumulative development would be subject to similar requirements to those imposed and implemented for the proposed project and would be required to adhere to applicable regulations, standards, and procedures. As such, the proposed project would not result in impacts that would be cumulatively considerable.

6.4.7 Greenhouse Gas Emissions

As described in Section 5.7, Greenhouse Gas Emissions, the project's significance is based on its potential to conflict with the applicable plans adopted for the purpose of reducing greenhouse gas (GHG) emissions, including the City's Climate Action Plan, the 2022 Scoping Plan, the 2017 Scoping Plan, Assembly Bill 32 Regulations, the San Diego Association of Governments' (SANDAG's) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the City's General Plan. As demonstrated in Section 5.7, the project would not conflict with applicable GHG reduction plans and regulations, accordingly, the impact would be less than significant.

Due to the global nature of the assessment of greenhouse gas emissions and the effects of global climate change, GHG emissions analysis, by its nature, is a cumulative impact analysis. Therefore, the information and analysis provided in Section 5.7, Greenhouse Gas Emissions, to determine project-level impacts, applies here and the project's contribution to global climate change would not be cumulatively considerable.

6.4.8 Hazards and Hazardous Materials

As described in Section 5.8 Hazards and Hazardous Materials, construction and operation of the project is not anticipated to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. In addition, because soil contamination would be remediated to San Diego Regional Water Quality Control Board and San Diego Department of Environmental Health and Quality standards prior to project construction, minor grading and trenching would not encounter contaminated soil that could result in a significant hazard to on-site construction personnel or the environment. Further, with compliance with the Construction General Permit (CGP) and MS4 Permit, project construction would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Health and safety impacts are generally site specific and thus handled on a site-by-site basis. All projects identified in Table 6-1 would require the identification of existing hazardous materials on site and would be required to comply with existing regulations related to use, transport, and disposal of hazardous materials. Similarly, all related projects would be required to analyze and properly mitigate any impacts, if impacts are identified. Cumulative projects No. 1 and No. 3 are already under construction and the use, transport, and handling of hazardous materials were addressed in the EIR for the Chula Vista Bayfront Master Plan. Cumulative projects No. 4 and 5 are on the project site and the buildings have already been demolished in order to prepare the site for soil remediation. Cumulative

project No. 2 is complete and any hazardous materials used for operation of the project would be required to comply with local and state laws and regulations. Similarly, cumulative project No. 6 is an expansion of an existing facility and hazardous materials used during construction and future operation would be required to comply with local and state laws and regulations. Overall, the proposed project would not result in a cumulatively considerable impact as it relates to hazards and hazardous materials.

6.4.9 Hydrology and Water Quality

As described in Section 5.9, Hydrology and Water Quality, through implementation of the requirements outlined in the CGP, construction-related impacts to surface water and groundwater would be minimized and impacts would be less than significant. With incorporation of water quality BMPs and project design features, as described above for construction and operation, the project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. The project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. The proposed storm drain system would be sufficient to satisfy Chula Vista criteria in the post-development condition (Appendix I1) and would not result in erosive scour and associated siltation of San Diego Bay.

In combination with the other cumulative projects in the area, specifically projects No. 1, 2, 3, and 6, there would be an increase in impervious surfaces which could result in increased surface runoff, alteration of regional drainage patterns, and flooding. However, like the proposed project, each individual project applicant would be required to hydrologically engineer the respective project sites to ensure that post-development surface runoff flows can be accommodated by the regional drainage system. As such, with implementation of storm drain facilities for each related project, if applicable, the proposed project would not result in a cumulative impact to hydrology. Therefore, the proposed project's contribution to a cumulative hydrology impact would not be cumulatively considerable.

6.4.10 Land Use and Planning

As described in Section 5.10, Land Use and Planning, the proposed project would not result in a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant.

Other projects under review by the City would also be required to comply with the General Plan, any applicable Master Plan, Specific Plan, or Local Coastal Program, and existing zoning. Projects that would not be consistent would require implementation of a General Plan amendment, master plan amendment, and/or zone change and would be required to demonstrate conformance with pertinent goals, policies, and recommendations. Each project would be required to be considered in combination with other foreseeable projects and would be required to demonstrate consistency with an adopted land use plan, land use designation, or policy. Therefore, land use impacts would not be cumulatively considerable.

6.4.11 Noise

As described in Section 5.11, Noise, short-term construction noise is predicted to be well below the Federal Transit Administration guidance of 80 dBA L_{eq} over an 8-hour period, and therefore is less than significant. Traffic related to construction activities would not result in a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or

applicable standards of other agencies. Potential impacts at existing off-site noise-sensitive land uses along roadway segments and project-generated changes to future traffic noise would be less than significant.

In combination with the other cumulative projects in the area, specifically projects No. 1, 2, 3, and 6, there would be an increase in ambient noise in the surrounding area. Cumulative projects No. 4 and 5 have already been completed and the buildings have been demolished, so these projects would not contribute to an increase in noise. Potential noise impacts have been adequately addressed in previous environmental documents and mitigation has been applied as applicable. The previous buildings on the project site contributed to traffic noise and operational noise and introduction of the proposed project would not substantially increase noise beyond what was occurring before the buildings were demolished. Overall, the project's contribution to a cumulatively considerable noise impact would be negligible.

6.4.12 Population and Housing

As described in Section 5.12, Population and Housing, once operational, the estimated 1,000 jobs that would result from the proposed project would result in some amount of population growth within the City due to new employment opportunities, however, this population growth would not be considered unplanned because the proposed project would restore what was previously a major job center for the City of Chula Vista. No existing residential uses occupy the project site as the site was previously developed with industrial buildings, which have since been demolished. The proposed project does not include the construction of any residential units and would not displace existing housing or people or necessitate the construction of replacement housing elsewhere.

Cumulative projects No.1, Gaylord Hotel (1,600 rooms) and project No. 3, Amara Bay (1,500 multi-family units) would result in an increase in population. However. these projects were adequately analyzed as part of the Bayfront Master Plan EIR and assumed in regional housing and population projections. Since the proposed project would not result in the addition of new housing units or demolish existing units, it would not contribute to a cumulative impact related to housing. Although the project would generate employment opportunities, which could generate additional population within the City, it would essentially be reestablishing what was a major job center for the City of Chula Vista and the growth would not be unplanned or unforeseen. Overall, the project's contribution to a cumulatively considerable population and housing impact would be less than significant.

6.4.13 Public Services

As described in Section 5.13, Public Services, the project would not substantially increase the demand of fire protection services requiring the construction of new or expanded fire protection facilities or facilitate the need for additional firefighters and equipment. The City's Public Facilities Development Impact Fee (PFDIF) would help cover the cost of new or expanding public facilities within the City, including fire and police facilities. The proposed project would be subject to payment of the PFDIF fees at the rate in effect at the time building permits are issued. Payment of the PFDIF would be necessary to ensure that the project contributes its fair share of the cost of fire police facilities and equipment needed to adequately accommodate increasing demand within the City. In addition, the project site is located within existing Community Facilities Districts (CFDs) for the Chula Vista Elementary School District and Sweetwater Union High School District, which impose a special tax on property owners to finance both school districts. Any development of new school facilities resulting from these CFDs would be undertaken by the school district at that time. Pursuant to Education Code Section 17620(a)(1), the governing board can authorize the levy of a fee, charge, dedication, or other requirements against any construction within school district boundaries, and

with the school district's collection of Statutory and Alternative fees developers can fully mitigate any impacts. Lastly, because the project is considered a commercial development, payment of PFDIF for libraries is not required.

Cumulative projects No. 4 and 5 involved demolition of buildings on the project site, thus these projects would not contribute to a cumulative impact on public services. Cumulative projects No. 1, 2, 3, and 6 would place additional demand on public services. However, as part of the Chula Vista Bayfront Master Plan EIR, project applicants were required to satisfy adequate levels of service through mechanisms that included payment of a PFDIF, construction of facilities contemplated in the Master Plan, or other equivalent funding agreements. Since the proposed project site was previously served public services prior to demolition of the buildings in Planning Area B-1 and B-2, the site would continue to be served by existing services once the site is redeveloped. The intensity of the proposed project is not substantially greater than what was previously on site and existing public services would be adequate to continue to serve the site. Therefore, the project's contribution to a cumulatively considerable impact would be less than significant.

6.4.14 Recreation

As described in Section 5.14 Recreation, per Chula Vista Municipal Code Section 17.10.120, the proposed project would not be required to pay development fees because there are no proposed residences within the project. Therefore, because the proposed project does not include a new residential population and would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Impacts would be less than significant.

Cumulative projects No. 4 and 5 have already been completed and the buildings have been demolished, so these projects would not contribute to a cumulative impact on recreational facilities. Regarding projects No. 1, 2, 3, and 6, an increase in the use of recreational facilities would potentially occur. However, these projects were part of the Chula Vista Bayfront Master Plan EIR, and their impact on recreational facilities were analyzed and compensated for therein. Mitigation in the Bayfront Master Plan EIR specifically called for hotels and multi-family units to provide an adequate amount of developed parkland in accordance with the City's Municipal Code (Chapter 17.10), prior to issuance of certificate of occupancy. Therefore, these cumulative projects already have mechanisms in place to ensure that recreational facilities are funded or built prior to operation. Since the proposed project would result in less than significant impacts to recreational facilities and cumulative projects have built or compensated for recreational facilities, impacts would be less than significant.

6.4.15 Transportation

As described in Section 5.15, Transportation, the proposed project would not conflict with existing or proposed bicycle, pedestrian, or transit facilities in its vicinity. In addition, the proposed project (A, B1 and B2) is located in census tract 12600. The SANDAG average vehicles miles traveled (VMT) per employee is 18.90 and the threshold of 85 percent would be 16.06 VMT per employee or below. The average VMT per employee of this tract is 15.91, which is below the regional average VMT per employee of 18.90, as well as below the VMT per employee threshold (i.e., 85 percent of the regional mean) of 16.06. Therefore, it can be concluded that the proposed project is in a VMT efficient area for all employee uses. Because the proposed project would meet the VMT screening criteria described above, a more detailed VMT analysis is not required, and can be presumed to result in a less-than-significant VMT impact.

Industrial employment and employment[1] projects located within a VMT-efficient area may be presumed to have a less than significant impact absent substantial evidence to the contrary. Because the project screens out of a detailed VMT analysis and results in a less-than-significant impact under baseline conditions, the project's cumulative VMT impact can also be presumed to result in a less than significant VMT impact. Cumulative impacts would be less than significant.

6.4.16 Utilities and Service Systems

As described in Section 5.16, Utilities and Service Systems, the proposed project would have adequate water, wastewater, stormwater, and telecommunication infrastructure. The project would be required to comply with all local and state regulations regarding solid waste and the surrounding landfills would have capacity to serve the project. Impacts would be less than significant.

All cumulative projects would be required to assess whether adequate infrastructure exists to serve their developments and whether additional or expanded infrastructure would be required to be constructed. and mitigate any potential impacts to water infrastructure caused by the project. As necessary, all projects would be required to construct water infrastructure improvements in order to adequately serve the development,

[1] Transportation Study Guidelines Appendix D: Land Use Designations includes the following for employment related uses that pertain to the project:
Industrial employment: Industrial Park (no commercial), Industrial Plant (multiple shifts), Manufacturing/Assembly, Warehousing, Storage.
Commercial employment: Agriculture, Hospital-General/Convalescent/Nursing, Industrial/Business Park (commercial included), Science Research & Development, Hotel (with convention facilities/restaurants), Motel, Resort Hotel, Business Hotel, Military, Standard Commerical Office, Large (High-rise) Commercial Office, Office Park, Single Tenant Office, Corporate Headquarters, Government Offices primarily office with employees, Medical/Dental)

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SOURCE: Mizuta Traffic Consulting, 2024

FIGURE 6-1

Cumulative Projects

Rhor Whol Specific Plan

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7 Growth Inducement

Section 15126.2(d) of the California Environmental Quality Act (CEQA) Guidelines mandates that the growth-inducing nature of a proposed project be discussed. This CEQA Guideline states that the growth inducement analysis is intended to address the potential for the project to "foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment." Further, the CEQA Appendix G Checklist (Population and Housing) mandates that a CEQA document address a project's likelihood to induce substantial population growth in an area, either directly (for example, by proposing new homes or businesses) or indirectly (for example, through extension of roads or other infrastructure).

A project may be distinguished as either facilitating planned growth or inducing unplanned growth. Facilitating growth relates to the establishment of direct employment, population, or housing growth that would occur within a project site. Inducing growth is related to lowering or removing barriers to growth or by creating an amenity or facility that attracts new population/economic activity. For purposes of analysis in this environmental impact report (EIR), a significant growth-inducement impact would occur if the proposed Rohr Wohl Specific Plan Project (proposed project or project), and all associated infrastructure improvements, directly or indirectly removes obstacles to growth such that the induced growth would significantly burden existing community services or the environment, or cause a demand for a General Plan Amendment.

This chapter contains a discussion of the growth-inducing factors related to the proposed project. As defined in CEQA Guidelines Section 15162.2(d), a project is defined as growth inducing when it directly or indirectly:

1. Fosters population growth;
2. Fosters economic growth;
3. Includes the construction of additional housing in the surrounding environment;
4. Removes obstacles to population growth;
5. Taxes existing community service facilities, requiring construction of new facilities that could cause significant environmental effects; and/or
6. Encourages or facilitates other activities that could significantly affect the environment, either individually or cumulatively.

It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

7.1 Growth Inducement Due to Population Growth

Section 5.12, Population and Housing, notes that the proposed project would have a direct impact on the population growth of the City of Chula Vista (City) by amending the existing zoning of General Industrial (I) zoning to allow for a combination of light industrial, office, commercial, and visitor-oriented uses. The estimated creation of 1,000 jobs would further contribute to the City's population growth. The project area was already classified as I and identified for development as light industrial, office, commercial, and visitor-oriented uses. To accommodate this, three new zoning designations—PA-1 (Planning Area A), PA-2 (Planning Area B-1), and P-3 (Planning Area B-2)—were created to allow for permitted, conditionally permitted, and prohibited uses within six land use categories. These include

Commercial Retail (CR), Commercial Visitor (CV), Commercial Office (CO), Light Industrial (LI), Regional Technology Park (RTP), and Business Park Flex (BFR).

Because the proposed project would restore a recent previous major job center for the City and aligns with the existing General Plan Industrial (I) designation, it would not be considered unplanned population growth. Furthermore, the development of a mixed-use regional technology district would create new employment opportunities and thus contribute to population growth within the City. The proposed project would result in one-time construction employment opportunities and annual operational employment opportunities. Construction opportunities would be temporary and would not result in the permanent relocation of employees. Operational employment opportunities could result in indirect growth inducement from employees that choose to relocate from outside the City.

7.2 Growth Inducement Due to Economic Growth

Increasing the employment population can lead to economic growth by creating a higher demand for regional and local goods and services. The proposed project is designed to encourage clean industrial, commercial, research and development, and office uses, which would provide on-site services and create employment opportunities for residents in the surrounding areas. Business in these sectors would generate new indirect economic output from subsequent expenditures on goods and services to other area businesses. The proposed project would be able to take advantage of its proximity to Interstate 5, the Port of San Diego, and various defense industry assets and contractors to enhance the greater Chula Vista Bayfront area. Because the proposed project would restore a recent previous major job center for the City and aligns with the existing General Plan Industrial (I) designation, it would not be considered unplanned population growth.

7.3 Growth Inducement Due to Additional Housing

As discussed in Section 5.12, the project area is currently designated as General Industrial (I) in the City of Chula Vista General Plan (City of Chula Vista 2005). The land uses on site would be amended to allow for a flexible combination of light industrial, office, commercial and visitor-oriented uses. No residential units are proposed; therefore, the project would not induce growth due to additional housing.

7.4 Growth Inducement Due to Removal of Obstacles

Improvements to transportation, utilities, and public service infrastructure as part of the proposed project would accommodate the direct growth induced by the proposed project. These improvements would connect to existing infrastructure (including water and sewer) adjacent to the project site and would provide access and utility service solely to the proposed project. The project does not propose larger infrastructure projects that would serve the regional area as a whole.

The proposed project will feature a storm drain system that meets the City's Standard Urban Stormwater Mitigation Plan requirements for water quality and that can handle peak flows. The system will utilize concrete gutters to collect and transport on-site runoff into storm drains located along the western property line of Planning Areas B-1 and B-2. These private storm drains connect to large-diameter City storm drains located at the southwest and northwest corners of Planning Areas B-1 and B-2. Planning Area A drains through an overland flow system into a ditch along its western property line before entering the City's storm drain system along H Street. The drainage

facilities will incorporate low-impact development and water quality features on site, such as swales, bioretention basins, and mechanical treatment, and will be designed to comply with all water quality requirements. The proposed storm drain system is designed to accommodate the proposed project.

The growth-inducing potential of the proposed project would be significant if the infrastructure improvements required to serve the project significantly exceeded the City's capacity to accommodate growth beyond what is envisioned under the General Plan. However, because the project site is within a developed area along the Bayfront, which currently supports development and is surrounded by complementing land uses, only minor improvements limited to the project site are required to ensure adequate infrastructure is available to serve the proposed project. Overall, the proposed project would not result in growth inducement due to removal of obstacles.

7.5 Taxation of Existing Public Facilities and Services

As stated in CEQA Guidelines Section 15126.2(d), "Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects." As described in Section 5.12 of this EIR, the proposed project would not result in a substantial burden to existing community services or facilities, such as police service, fire service, schools, parks, or libraries. The proposed project would be required to pay the City's Public Facilities Development Impact Fees (PFDIF). The PFDIF would address the project's proportional impact on capital facilities, such as structures and equipment. It does not address the impact associated with operations and maintenance for those facilities. Public funds such as property taxes, sales taxes, and fees generated by the project would be used to cover the incremental costs associated with providing services. The project would be required to pay the PFDIF, which would be used exclusively for future facility improvements necessary to ensure that the development contributes its fair share of the cost of facilities and equipment determined to be necessary to adequately accommodate new development in the City. Therefore, the proposed project would not indirectly induce growth due to taxation of existing public facilities and services.

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8 Significant Irreversible Environmental Changes

California Environmental Quality Act (CEQA) Guidelines Section 15126.2(c) indicates the following:

> [U]ses of non-renewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or non-use thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Implementation of the proposed Rohr Wohl Project (project or proposed project) would involve consumption of limited, slowly renewable, and non-renewable resources. This consumption would occur during the construction phase of the project and would continue throughout its operational lifetime. The project would require a commitment of resources that would include (1) building materials, (2) fuel and operational materials/resources, and (3) the transportation of goods and people to and from the project site.

Construction of the project would require the consumption of resources that are not renewable or that may renew so slowly as to be considered non-renewable. These resources would include the following construction supplies: certain types of lumber and other forest products; aggregate materials used in concrete and asphalt such as sand, gravel, and stone; metals such as steel, copper, and lead; petrochemical construction materials such as plastics; water; and fossil fuels such as gasoline and oil. While implementation of mitigation measures and project design features would reduce the use of non-renewable resources, fossil fuels would represent the primary energy source associated with construction and ongoing operation of the project, and the existing, finite supplies of these natural resources would be incrementally reduced.

Additionally, the project would involve an unquantifiable, but limited, use of potentially hazardous materials typical for mixed-use development projects, including cleaning solvents and fertilizers and pesticides for landscaping. These materials would be contained, stored, and used on site in accordance with manufacturers' instructions and applicable standards and regulations. Compliance with regulations would serve to protect against a significant and irreversible environmental change that could result from the accidental release of hazardous materials.

Furthermore, the project would result in the permanent commitment of land to support the proposed land uses that will redevelop and repurpose land that has been developed and operated for industrial purposes since about 1941. The project could result in direct and indirect impacts to sensitive species such as migratory birds or bats. Direct/indirect impacts would be considered potentially significant under CEQA and require implementation of the mitigation measures outlined in Section 5.3, Biological Resources. These mitigation measures would be consistent with the City of Chula Vista Multiple Species Conservation Program Subarea Plan and the Habitat Loss and Incidental Take Ordinance and would reduce impacts to a level below significance.

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9 Effects Found Not to Be Significant

Section 15128 of the California Environmental Quality Act (CEQA) Guidelines requires that an environmental impact report (EIR) briefly describe potential environmental effects that were determined not to be significant and therefore were not discussed in detail in the EIR. The environmental issues discussed below are not considered significant for the proposed Rohr Wohl Specific Plan Project (project or proposed project), and the reasons for the conclusion of non-significance are discussed below.

9.1 Agriculture and Forestry Resources

Prior to development in 1941, the project site was used for agricultural purposes. However, according to the California Department of Conservation's California Important Farmland Finder, the project site is not within an important farmland area and is categorized as Urban and Built-Up Land. Urban and Built-Up Land is defined as land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel (DOC 2018). The site was previously developed with two main industrial buildings and several outbuildings that were developed and operated for industrial purposes since about 1941. The project site lies within the General Industrial (I) Zoning and Industrial (I) General Plan land use designations and is therefore not zoned for or intended to support agricultural or forestry uses. As such, because the project site is not currently used for agriculture or forestry and has been developed since 1941, **no impacts** to agriculture and forestry resources would occur.

9.2 Mineral Resources

The Surface Mining and Reclamation Act of 1975 includes requirements and programs to ensure the long-term availability of mineral resources and ensure that the significant adverse environmental impacts of surface mining are adequately mitigated. As mandated by the Surface Mining and Reclamation Act of 1975, aggregate mineral resources within the state are classified by the State Mining and Geology Board through application of the Mineral Resource Zone (MRZ) system. The MRZ system is used to map all mineral commodities within identified jurisdictional boundaries, with priority given to areas where future mineral resource extraction may be prevented or restricted by land use compatibility issues, or where mineral resources may be mined during the 50-year period following their classification. The MRZ system classifies lands that contain mineral deposits and identifies the presence or absence of substantial sand and gravel deposits and crushed rock source areas (i.e., commodities used as, or in the production of, construction materials). The state geologist classifies MRZs within a region based on the following factors:

- **MRZ-1:** Areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.
- **MRZ-2:** Areas where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists.
- **MRZ-3:** Areas containing mineral deposits for which the significance cannot be determined from available data.
- **MRZ-4:** Areas where geologic information does not rule out either the presence or absence of mineral resources.

According to the Updated Mineral Land Classification Map for Portland Cement Concrete-Grade Aggregate in the Western San Diego County Production-Consumption Region, California, a majority of the project site is located within an MRZ-1 zone, meaning there are no significant mineral deposits present, or it is judged that little likelihood exists

for their presence (DOC 2017). The eastern portion of the site is located in MRZ-3 zone, meaning areas containing mineral deposits for which the significance cannot be determined from available data (DOC 2017).

As discussed in the City of Chula Vista General Plan, Environmental Element, portions of the Otay River Valley are identified as an MRZ-2 area (City of Chula Vista 2005). Additionally, two other MRZ-2 areas are located on and just outside the General Plan area: one in the Sweetwater River Valley east of the Sweetwater Reservoir, and the other along the Jamul/Dulzura Creek east of Lower Otay Lake. However, the project site is located outside the "Regionally Significant" MRZ-2 Aggregate Resource Areas (City of Chula Vista 2005). Additionally, the project would not be used for extractive uses, but rather for a variety of uses including Commercial Retail (CR), Commercial Visitor (CV), Commercial Office (CO), Light Industrial (LI), Regional Technology Park (RTP), and Business Park Flex (BPF). Thus, the City would not permit or plan for mining operations as a future use in this area. Therefore, a **less than significant impact** to mineral resources would occur.

9.3 Wildfire

Wildfire is a continuous threat in Southern California and is particularly concerning in the wildland–urban interface, the geographic area where urban development either abuts or intermingles with wildland or vegetative fuels. Because the City receives limited precipitation, the potential for wildland fires represents a significant hazard within certain areas of the City (City of Chula Vista 2005). The project site is an area statutorily designated as a Local Responsibility Area by the City and the California Department of Forestry and Fire Protection (CAL FIRE) and is not located within a designated Fire Hazard Severity Zone (CAL FIRE 2022). The project site is located in the Bayfront area of the City and is surrounded by existing and newly developed sites. There are no adjacent wildlands or vegetative fuels.

The City's fire protection and emergency medical services are provided by the Chula Vista Fire Department (CVFD). In conformance with the CVFD Master Plan, the City plans on expanding CVFD staffing and equipment as needed to meet the service standard and to minimize hazards to firefighters and the public. CVFD currently operates nine fire stations. The nearest fire station to the site is Fire Station No. 1, located less than 1 mile from the site.

The project site is an existing industrial site with existing infrastructure. Improvements to infrastructure would be necessary to ensure adequate levels of service for the future land uses proposed and would be designed based on the City's codes and regulations. The installation and maintenance of associated infrastructure would not exacerbate wildfire risk or result in impacts to the environment. Impacts to wildfire would be **less than significant**.

10 Alternatives

10.1 Introduction

Section 15126.6 of the California Environmental Quality Act (CEQA) Guidelines states that the Environmental Impact Report (EIR) shall "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives." The comparative merits of the alternatives evaluated, including the No Project Alternative, shall also be discussed.

The range of alternatives evaluated in an EIR is governed by the "rule of reason," which requires the EIR set forth alternatives adequate to permit a reasoned choice by decisionmakers and limited to alternatives that "would avoid or substantially lessen any of the significant effects of the project." An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative (Section 15126.6(a) of the CEQA Guidelines).

Other than the No Project Alternative, the EIR needs to examine only those alternatives that could feasibly obtain most of the basic objectives of the proposed project even if the alternative would impede to some degree the attainment of project objectives.

Factors that may influence feasibility of an alternative also include "site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent)" (CEQA Guidelines, Section 15126.6[f][1]). The ultimate determination as to whether an alternative is feasible or infeasible is made by the lead agency's decision-making body, the Chula Vista City Council (see PRC Section 21081[a] [3].)

This section presents several alternatives to the proposed project, which were considered pursuant to CEQA and evaluated for their ability to meet the basic objectives of the project, while reducing or avoiding the environmental impacts of the project identified in Chapter 5, Environmental Analysis, of the EIR. Those alternatives include: (1) No Project/No Build Alternative (Section 10.4.1); (2) Build to Existing Land Use Designations Alternative (Section 10.4.2); (3) Exclusion of Hotel in Planning Area B-2 Alternative (Section 10.4.3); and (4) Exclusion of all Planning Area B-2 Alternative (Section 10.4.4).

10.2 Criteria for Selection and Analysis of Alternatives

The Rohr Wohl Specific Plan Project (project or proposed project) would not result in any significant and unavoidable impacts. The proposed project would result in potentially significant impacts that would be reduced to a level below significant with implementation of mitigation, related to the following: air quality, biological resources, cultural resources, and geology and soils (paleontological resources). The proposed project would result in less-than-significant impacts to the following: aesthetics, energy, greenhouse gases, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, recreation, traffic and circulation, tribal cultural resources, and utilities and service systems.

For each of the alternatives identified, this EIR conducts the following assessment:

- Describe the alternative
- Determine if the alternative would meet most of the basic project objectives
- Assess potential feasibility of the alternative
- Determine if the alternative would potentially eliminate or reduce a potentially significant impact of the project

If the alternative meets the above criteria and provides a meaningful CEQA analysis, then the EIR analysis will address the potential impacts of the alternative relative to those potentially significant impacts of the project. An environmentally superior alternative will then be identified based on the alternative's ability to reduce environmental impacts.

Based on the identified potentially significant environmental impacts above, the objectives established for the project (refer to Section 10.3, Project Objectives, below), consideration of local plans and zoning designations, and consideration of public input, this EIR evaluates four alternatives to the proposed project:

1. No Project/No Build Alternative
2. Build to Existing Land Use Alternative
3. Exclusion of Hotel in Planning Area B-2
4. Exclusion of All Planning Area B-2

10.2.1 Feasibility

CEQA Guidelines, Section 15126.6(f)(1), identifies the factors to be taken into account to determine the feasibility of alternatives. The factors include site suitability; economic viability; availability of infrastructure; general plan consistency; other plans or regulatory limitations; jurisdictional boundaries; and whether the applicant can reasonably acquire, control, or otherwise have access to the alternative site. No one of these factors establishes a fixed limit on the scope of reasonable alternatives. An alternative does not need to be considered if its environmental effects cannot be reasonably ascertained and if implementation of such an alternative is remote or speculative.

It has been recognized that, for purposes of CEQA, "feasibility" encompasses "desirability" to the extent that the latter is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors (*California Native Plant Society v. City of Santa Cruz* [2009] 177 Cal.App.4th 957, 1001). This balancing is harmonized with CEQA's fundamental recognition that policy considerations may render alternatives impractical or undesirable (California Public Resources Code Section 21081; CEQA Guidelines Section 15126.6[c] and 15364).

10.2.2 Evaluation of Significant Impacts

According to CEQA Guidelines, Section 15126.6(b), the alternatives discussion should focus on those alternatives that, if implemented, could eliminate or reduce any of the significant environmental impacts of the proposed project. The significant effects of the project impacts are considered to be those that are identified to be potentially significant prior to the incorporation or implementation of any mitigation measures.

10.2.3 Rationale for the Selection of Alternatives

As part of an alternatives analysis, CEQA requires an EIR to address a No Project Alternative. The purpose of describing and analyzing a No Project Alternative is to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving the proposed project.

EIRs should also identify any alternatives that were considered by the Lead Agency but rejected, and briefly explain the reasons why the Lead Agency made such a determination. Among the factors that may be used in an EIR to eliminate alternatives from detailed consideration are (1) failure to meet most of the basic project objectives, (2) infeasibility, and/or (3) inability to avoid significant environmental impacts.

In accordance with these requirements and based on comments received during the CEQA Notice of Preparation and scoping process for the proposed project, alternatives to the proposed project were considered and analyzed compared to the proposed project.

10.3 Project Objectives

Following are the objectives of the proposed project:

1. Generate a diverse spectrum of employment opportunities and regain for Chula Vista the approximate 1,000 jobs that existed on the site during Rohr Industries operations.
2. Foster Chula Vista's capture of leading businesses and employers in existing and emerging economic sectors that drive the regional economy.
3. Encourage clean industrial, research and development, and office use designations (e.g., defense, Port-related, e-commerce, technology, hospitality, and medical device/life sciences).
4. Allow a flexible combination of light industrial, commercial, and visitor-oriented uses to enhance both the existing Collins Aerospace campus and the greater Chula Vista Bayfront area, while taking advantage of its proximity to the I-5 FWY, the Port of San Diego, various defense industry assets and contractors.
5. Attract significant capital investment to Chula Vista at vacant and underutilized property.
6. Highlight the proximity to the "E" Street and "H" Street Trolley Stations to encourage transit usage by visitors and workers.
7. Expand mobility options of today and the future and thoughtfully address Vehicle Miles Traveled ("VMT").
8. Leverage ideal location in the bi-national region, with proximity to Mexico, convenient access by air (SAN, CBX) and enhanced border crossing infrastructure under development.
9. Provide flexibility for land uses and development that evolves as the Chula Vista Bayfront matures over the coming years and decades.
10. Provide for roadways, infrastructure, and utilities to support on-site land uses as the project evolves.
11. Facilitate the establishment of design guidelines and development standards consistent with the citywide design guidelines for commercial and industrial uses and Local Coastal Program guidelines.
12. Develop a plan that is economically feasible and capable of implementation based on reasonably anticipated economic conditions such that no economic burden to the City of Chula Vista would occur.

10.4 Alternatives Impact Summary

10.4.1 No Project/No Build Alternative

No construction would occur on site. Planning Areas B-1 and B-2 would remain vacant with newly remediated soil. Warehouse in Planning Area A would remain in current condition similar to proposed project. All impacts identified as a result of the proposed project would be reduced.

Aesthetics

As described in Section 5.1, Aesthetics, from both the Marina Parkway/H Street intersection and the northerly segment of Marina Parkway, the project site is not within westerly oriented views toward San Diego Bay, and therefore, implementation of the Specific Plan and construction and operation of potential future commercial, industrial, technology, and business park development in Planning Areas A, B-1, and B-2 would not result in blockage or substantial interruption of existing available views to San Diego Bay from Marina Parkway. The project site is not readily visible from a state scenic highway and proposed development would not remove or substantially alter scenic resources, including trees, rock outcroppings, and historic buildings. The project would not conflict with aesthetics-related policies of the General Plan. Because implementation of the Rohr Wohl Specific Plan and future development on the project site would be consistent with identified aesthetics-related policies of the Chula Vista General Plan, potential conflicts with existing regulations governing scenic quality are not anticipated, and impacts would be less than significant. In addition, exterior lighting installed on the project site to support operations would not adversely affect nighttime views in the area, and the project would not result in substantial glare that would adversely affect daytime views in the area.

Under the No Project/No Build Alternative, nothing would be built in Planning Area B-1 or B-2 and it would remain vacant, graded, and with soil remediated. The existing warehouse in Planning Area A would remain in its current condition. Excluding development in Planning Areas B-1 and B-2 would not complement the surrounding developments currently underway and would not active the waterfront with compatible uses on site. Leaving the project site as vacant graded land with no development would likely increase aesthetics impacts and would negatively contribute to the scenic quality of the area. Impacts would be increased as a result of the No Project/No Build Alternative.

Air Quality

As described in Section 5.2, Air Quality, the proposed project fosters a development pattern that promotes orderly growth by developing on a site with previous industrial uses. As such, the project would not contribute to substantial population and employment growth and associated VMT that was not anticipated for the project site in the existing General Plan. Giving the previous uses that existed on the project site, the anticipated growth in employment and population would be within regional growth forecasts. Implementation of the proposed project would not conflict with or obstruct the implementation of the Regional Air Quality Strategy (RAQS) and/or applicable portions of the State Implementation Plan (SIP). Daily construction emissions for the project would exceed the South Coast Air Quality Management District's (SCAQMD's) significance thresholds for volatile organic compounds (VOCs), primarily from painting emissions. Therefore, the project would have a potentially significant impact related to emissions of criteria air pollutant emissions during construction and mitigation is required to reduce the impact. Mitigation Measure AQ-1 (MM AQ-1) would require the use of super compliant VOC paint, which is 10 milligrams (mg) of VOC per liter. The net daily operational emissions for the project would not exceed the SCAQMD's thresholds for any criteria air pollutant.

Therefore, the project would result in a less-than-significant impact related to emissions of criteria air pollutant emissions during operation.

The construction health risk assessment (HRA) determined that diesel particulate matter (DPM) emissions from construction of the project would result in a Maximum Individual Cancer Risk of 20 in 1 million and a Chronic Hazard Index of 0.011. The Chronic Hazard Index would be below the 1.0 significance threshold; however, the project would exceed the cancer risk threshold of 10 in a million and would be potentially significant without mitigation (MM-AQ-2 and MM-AQ-4). The operational HRA determined that DPM emissions from operation of the project would result in a Maximum Individual Cancer Risk of 205 in 1 million and a Chronic Hazard Index of 0.055. The Chronic Hazard Index would be below the 1.0 significance threshold; however, the project would exceed the cancer risk threshold of 10 in a million and would be potentially significant without mitigation (MM-AQ-4, MM-AQ-5, and MM-AQ-6). All impacts would be reduced to less than significant with mitigation.

Under the No Project/No Build Alternative, air pollutant emissions associated with construction, including emissions associated with site preparation, site finishing, and architectural coatings, would not occur. This alternative would therefore avoid significant but mitigable emissions related to exposure from construction emissions, because no construction air pollutant emissions would occur. Implementation of this alternative would not introduce any uses that would generate operational air pollutant emissions. Although, leaving the site as a graded vacant lot would require daily or weekly dust suppression measures which would result in air quality impacts. However, compared to the proposed project, the No Project/No Build Alternative would reduce air quality impacts because no construction or operation would occur.

Biological Resources

As described in Section 5.3, Biological Resources, The entire project site consists of Tier IV habitats. Tier IV habitats are not considered significant and do not require mitigation. Special-status plant species were not documented within the study area and do not have a moderate or high potential to occur. Two documented special-status wildlife species were found within the study area, American peregrine falcon and osprey. This species has a low potential to nest on site. However, prior to mitigation, impacts would be potentially significant. MM-BIO-1 would be implemented to reduce impacts to a less-than-significant level. Osprey have a moderate potential for nesting on the site; therefore, impacts would be potentially significant prior to mitigation (MM-BIO-2).

The study area has the potential to support nests that would be protected under the MBTA and/or the California Fish and Game Code Section 3503, under which it is unlawful to “take, possess, or needlessly destroy” avian nests or eggs. Thus, if additional vegetation clearing or grading happens during the breeding season, impacts would be potentially significant and mitigation (MM-BIO-3) would be required. The area is not known to support roosting colonies of special-status bats; therefore, construction is not anticipated to substantially affect either species (pallid bat and western mastiff bat). Nonetheless, prior to mitigation (MM-BIO-4 and MM-BIO-5) impacts would be potentially significant.

In addition, compliance with regional and local laws, regulations, and policies, would ensure that indirect impacts would be less than significant; the proposed project would result in no impact to riparian habitats or other sensitive natural communities; the project site does not support areas that could be considered jurisdictional by the U.S. Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), California Coastal Commission, or California Department of Fish and Wildlife (CDFW); the project does not propose any new barriers, such as new development or fencing, that would prevent wildlife movement; and the proposed project would abide by all local policies and ordinances protecting biological resources in the City of Chula Vista (City). However, in order to ensure

the project's compliance with the Multiple Species Conservation Program (MSCP) Subarea Plan, mitigation (MM-BIO-6, MSCP Subarea Plan Consistency and Adjacency) would be required. Prior to mitigation impacts would be potentially significant.

The No Project/No Build Alternative would not require any additional ground-disturbing activities. As such, this alternative would not result in potential direct and/or indirect impacts to nesting birds. This alternative would not require implementation of any mitigation measures, as proposed for the project. Therefore, as no development would occur under this alternative, compared to the proposed project, this alternative would result in reduced impacts to biological resources.

Cultural and Tribal Cultural Resources

As described in Section 5.4, Cultural and Tribal Cultural Resources, the potential for intact cultural deposits to exist within native soils to the depths of proposed ground disturbance is unknown. In the event that unanticipated cultural resources are encountered during project implementation, impacts could be potentially significant, and mitigation measures (MM-CUL-1) would be required. The results of the records search did not identify the presence of any previously recorded archaeological sites within the project site. However, prior to mitigation impacts would be potentially significant. While the potential to encounter human remains is low, in the event that human remains are uncovered, impacts would also be potentially significant (MM-CUL-1). On May 3, 2024, the City sent notification letters pursuant to Assembly Bill (AB) 52 and Senate Bill (SB) 18 to tribes who are traditionally and culturally affiliated with the area of the project. To date, one response from the San Pasqual Tribe was received on May 30, 2024. In response to their request, the City provided the project-specific Cultural Resources Report. The City reached out to the Tribe on July 17, 2024 via e-mail to conduct a formal consultation, and no response has been reciprocated. Consultation with Native American tribes is ongoing. Mitigation would still be required to reduce impacts to less than significant.

The No Project/No Build Alternative would not require any additional ground-disturbing activities. As such, this alternative would not result in potential direct and/or indirect significant impacts to cultural or tribal cultural resources. This alternative would not require implementation of MM-CUL-1 as proposed for the project. Therefore, compared to the proposed project, this alternative would result in reduced impacts to cultural and tribal cultural resources.

Energy

As described in Section 5.5, Energy, construction and operational consumption of electricity, natural gas, and petroleum would not be considered inefficient, wasteful, or otherwise unnecessary and impacts would be less than significant. In addition, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

The No Project/No Build Alternative would not require any energy consumption during construction, because nothing would be developed. This Alternative would also not consume any additional energy during operation because the warehouse on Planning Area A would remain in operation as it currently is, and nothing would be built in Planning Areas B-1 or B-2. As a result, less energy would be consumed under this alternative and impacts would be reduced compared to the proposed project.

Geology and Soils

As described in Section 5.6, Geology and Soils, impacts associated with landslides, seismic ground shaking, expansive soils and erosion would be less than significant. However, development of the proposed project would require excavations for building foundations and utilities, and any excavations into the potentially fossil-bearing strata within the Bay Point and San Diego Formations could result in potentially significant impacts to paleontological resources, and mitigation measure MM-GEO-1 would be required. Impacts would be reduced to less than significant.

Under the No Project/No Build Alternative, the project site would remain in its current state (graded and with soil remediated, and the existing warehouse in Planning Area A would remain as is). Existing topography and on-site soils would not be disturbed by any development. Paleontological resources would be avoided under this alternative since no additional grading or excavation for building foundations would be required, but conversely those resources would not be found for curation, study, and exhibition. Therefore, when compared to the proposed project, the No Project/no Build Alternative would reduce impacts related to geology and soils.

Greenhouse Gas Emissions

As described in Section 5.7, Greenhouse Gas Emissions, the project's significance is based on its potential to conflict with the applicable plans adopted for the purpose of reducing greenhouse gas (GHG) emissions, including the City's climate action plan (CAP), the 2022 Scoping Plan, the 2017 Scoping Plan, AB 32 Regulations, the San Diego Association of Governments' (SANDAG's) Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) and the City's General Plan. As demonstrated in Section 5.7, the project would not conflict with applicable GHG reduction plans and regulations, accordingly, the impact would be less than significant.

Under the No Project/No Build Alternative, the project site would remain in its current state (graded and with soil remediated, and the existing warehouse in Planning Area A would remain as is). Under the No Project/No Build Alternative, GHG emissions associated with construction and operation would not occur. Implementation of this alternative would not introduce any uses that would generate GHG emissions, with the exception of ongoing vehicle trips and operation of the warehouse in Planning Area-A. With no development occurring in Planning Area B-1 or B-2 GHG emissions under the No Project/No Build Alternative would be reduced compared to the proposed project.

Hazards and Hazardous Materials

As described in Section 5.8, Hazards and Hazardous Materials, construction and operation of the project is not anticipated to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. In addition, because soil contamination would be remediated to San Diego RWQCB and San Diego Department of Environmental Health and Quality standards prior to project construction, minor grading and trenching would not encounter contaminated soil that could result in a significant hazard to on-site construction personnel or the environment. Further, with compliance with the Construction General Permit and MS4 Permit, project construction would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Lastly, the project would not result in potentially hazardous conditions to nearby schools; result in safety hazards or excessive noise for people working or residing near an airport; result in interference with an adopted emergency response or evacuation plan; or result in the exposure of people or structures to wildfires.

Under the No Project/No Build Alternative, nothing would be built in Planning Area B-1 or B-2 and no potential use or storage of hazardous materials would occur. No hazardous materials associated with construction would be used on site because no construction would occur. Hazardous materials used during the operation of existing warehouse in Planning Area A would include various commercially available hazardous materials and cleaning products. When used in compliance with manufacturer's recommendations and applicable regulations, these chemicals do not result in a risk to human health or the environment. The routine transport, use, and/or disposal of these substances would be subject to applicable federal, state, and local health and safety laws and regulations, which would minimize risks associated with their use. Overall, since less development would occur, impacts would be reduced under this alternative compared to the proposed project.

Hydrology and Water Quality

As described in Section 5.9, Hydrology and Water Quality, through implementation of the requirements outlined in the Construction General Permit (CGP), construction-related impacts to surface water and groundwater would be minimized and impacts would be less than significant. With incorporation of water quality best management practices (BMPs) and project design features, the project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. The project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. The proposed storm drain system would be sufficient to satisfy Chula Vista criteria in the post-development condition (Appendix I1) and would not result in erosive scour and associated siltation of San Diego Bay. In addition, the project would not increase the rate of surface runoff; would not exceed the capacity of stormwater drainage systems; would not impede or redirect flood flows; is not located in a flood hazard, tsunami, or seiche zone; and would not interfere with implementation of water quality control plans or sustainable groundwater management plans.

Under the No Project/No Build Alternative, the site would remain vacant, graded, and with soil remediated in Planning Areas B-1 and B-2, and the existing industrial building would remain in operation in Planning Area A. No new stormwater infrastructure would be installed and temporary water diversion and sediment capture devices being used while the site is in a graded state would remain in place. Without development on site, no engineered stormwater infrastructure would be created to ensure runoff is not polluted and ensure runoff would not exceed the capacity of existing infrastructure. Potential impacts to hydrology and water quality may be increased under the No Project/No Build Alternative compared to the proposed project.

Land Use

As described in Section 5.10, Land Use and Planning, the proposed project would not result in a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant.

Under the No Project/No Build Alternative, the site would remain vacant, graded, and with soil remediated in Planning Areas B-1 and B-2, and the existing industrial building would remain in operation in Planning Area A. The cumulative projects surrounding the site would continue to be constructed and go into operation while the project site would remain vacant. A vacant site would provide less compatibility with surrounding uses. Infrastructure would not be upgraded (i.e., utility undergrounding, sidewalk improvements, etc.) and no development impact fees would be collected by the City. Overall, leaving the site vacant could result in greater conflicts with land use plans and land use compatibility; thus, land use impacts may be increased under the No Project/No Build Alternative compared to the proposed project.

Noise

As described in Section 5.11, Noise, short-term construction noise is predicted to be well below the Federal Transit Administration (FTA) guidance of 80 A-weighted decibels (dBA) energy-equivalent sound level (L_{eq}) over an 8-hour period, and therefore is less than significant. Traffic related to construction activities would not result in a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Potential impacts at existing off-site noise-sensitive land uses along roadway segments and project-generated changes to future traffic noise would be less than significant. Noise generated by Planning Areas A, B-1, and B-2 are expected to be below the City's 50 dBA L_{eq} nighttime threshold for multi-family residential land uses. Note that the multi-family residential land use threshold is applied to this analysis due to an absence of City thresholds for hotel land uses. Therefore, impacts associated with stationary operations noise would be less than significant. Lastly, because the predicted vibration level at 70 feet is less than this guidance limit of 0.2 to 0.3 inches per second (ips) peak particle velocity (PPV) and because there are no residential structures adjacent to the project, the risk of vibration damage to nearby structures is considered less than significant.

Under the No Project/No Build Alternative, the site would remain vacant, graded, and with soil remediated in Planning Areas B-1 and B-2, and the existing industrial building would remain in operation in Planning Area A. There would be no potential increase in noise associated with construction or operation because nothing would be built in Planning Areas B-1 or B-2. Impacts related to noise would be reduced under the No Project/No Build Alternative compared to the proposed project.

Population and Housing

As described in Section 5.12, Population and Housing, once operational, the estimated 1,000 jobs that would result from the proposed project would result in some amount of population growth within the City due to new employment opportunities; however, this population growth would not be considered unplanned because the proposed project would restore what was previously a major job center for the City of Chula Vista. No existing residential uses occupy the project site as the site was previously developed with industrial buildings, which have since been demolished. The proposed project does not include the construction of any residential units and would not displace existing housing or people or necessitate the construction of replacement housing elsewhere.

Similar to the proposed project, no housing would be developed under the No Project/No Build Alternative and no housing would be displaced. However, no increase or restoration of previous employment opportunities would be provided under this alternative. While impacts were determined to be less than significant under the proposed project, due to the lack of employment opportunities, impacts may be slightly reduced under the No Project/No

Public Services

As described in Section 5.13, Public Services, the project would not substantially increase the demand of fire protection services requiring the construction of new or expanded fire protection facilities or facilitate the need for additional firefighters and equipment. The City's Public Facilities Development Impact Fee (PFDIF) would help cover the cost of new or expanding public facilities within the City, including fire and police facilities. The proposed project would be subject to payment of the PFDIF fees at the rate in effect at the time building permits are issued. Payment of the PFDIF would be necessary to ensure that the project contributes its fair share of the cost of fire police facilities and equipment needed to adequately accommodate increasing demand within the City. In addition, the project site is located within existing Community Facilities Districts (CFDs) for Chula Vista Elementary School District (CVESD)

and Sweetwater Union High School District (SUHSD), which impose a special tax on property owners to finance both school districts. Any development of new school facilities resulting from these CFDs would be undertaken by the school district at that time. Pursuant to Education Code Section 17620(a)(1), the governing board can authorize the levy of a fee, charge, dedication, or other requirements against any construction within school district boundaries, and with the school district's collection of Statutory and Alternative fees developers can fully mitigate any impacts. Lastly, because the project is considered a commercial development, payment of PFDIF for libraries is not required.

Under the No Project/No Build Alternative, the site would remain vacant, graded, and with soil remediated in Planning Areas B-1 and B-2, and the existing industrial building would remain in operation in Planning Area A. There would be no additional demand on police and fire services as no habitable buildings would be developed in Planning Areas B-1 and B-2. Existing demand for services would remain for Planning Area A but no PFDIF would be collected for the undeveloped portions of the site. Impacts would be slightly reduced under the No/Project No Build Alternative when compared to the proposed project.

Recreation

As described in Section 5.14, Recreation, per Chula Vista Municipal Code (CVMC) Section 17.10.120, the proposed project would not be required to pay park development fees because there are no proposed residences within the project. Therefore, because the proposed project does not include a new residential population and would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Impacts would be less than significant.

Similar to the proposed project, no residences would be constructed as part of the No Project/No Build Alternative. Therefore, no increase in the use of existing parks or physical deterioration of recreational facilities would occur. Impacts would be similar when compared to the proposed project.

Transportation

As described in Section 5.15, Transportation, the proposed project would not conflict with existing or proposed bicycle, pedestrian, or transit facilities in its vicinity. In addition, the proposed project (A, B1, and B2) is located in census tract 12600. The SANDAG average VMT per employee is 18.90 and the threshold of 85 percent would be 16.06 VMT per employee or below. The average VMT per employee of this tract is 15.91, which is below the regional average VMT per employee of 18.90 as well as below the VMT per employee threshold (i.e., 85 percent of the reginal mean) of 16.06. Therefore, it can be concluded that the proposed project is in a VMT efficient area for all employee uses. Because the proposed project would meet the VMT screening criteria described above, a more detailed VMT analysis is not required, and can be presumed to result in a less-than-significant VMT impact.

Under the No Project/No Build Alternative, the site would remain vacant, graded, and with soil remediated in Planning Areas B-1 and B-2, and the existing industrial building would remain in operation in Planning Area A. No additional trips would be generated during construction or operation under the No Project/No Build Alternative because nothing would be built in Planning Areas B-1 or B-2. Therefore, when compared to the proposed project, the No Project/No Build Alternative would reduce impacts related to traffic and circulation because no VMT impacts would have the potential to occur.

As shown in the Local Mobility Analysis (LMA), the project would be fully responsible for signalizing the Bay Boulevard and G Street and Project Driveway and H Street intersections and retiming the signals at the I-5 Northbound Ramps

and E Street, Bay Boulevard and H Street, I-5 Northbound Ramps and H Street, and I-5 Northbound and Southbound Ramps and J Street intersections. The Project would contribute its fair share towards the construction of a traffic signal or roundabout at the Bay Boulevard and F Street. The Project would contribute its fair share towards the construction of a traffic signal at the J Street and L Street intersections with Bay Boulevard. All proposed improvements would achieve LOS D or better conditions during both peak periods except for the roundabout at Bay Boulevard and F Street. The improvements identified in the LMA are recommendations and the final improvement plan and project funding responsibility will be defined and documented in a separate Rohr/Wohl Specific Plan Transportation Conditions of Approval memo.

The No Project/No Build Alternative would not result in any development or add any trips to the surrounding streets or intersections. No fair share payment would be necessary, and no improvements would be constructed.

Utilities and Service Systems

As described in Section 5.16, Utilities and Service Systems, the proposed project would have adequate water, wastewater, stormwater, and telecommunication infrastructure. The project would be required to comply with all local and state regulations regarding solid waste and the surrounding landfills would have capacity to serve the project. Impacts would be less than significant.

Under the No Project/No Build Alternative, the site would remain vacant, graded, and with soil remediated in Planning Areas B-1 and B-2, and the existing industrial building would remain in operation in Planning Area A. No water supply would be needed, no wastewater would be generated, and no solid waste would be disposed of during construction or operation because nothing would be built under this alternative. Although impacts to utilities and service systems were determined to be less than significant, the No Project/No Build Alternative would have reduced impacts compared to the proposed project.

10.4.2 Build to Existing Land Use Designations Alternative

Rather than revising the land use/zoning designations the site would remain zoned General Industrial (I) and remain designated Industrial (I) by the General Plan. Development under this alternative would be required to be consistent with existing permitted uses in the General Industrial zone. Permitted uses in this zone include food service commercial, convenience sales and service commercial, business and communication service commercial, retail business supply commercial, research and development commercial, general wholesale sales commercial, transportation and warehousing commercial, automotive fee parking commercial, custom industrial, light industrial, general industrial, and essential service civic.

Aesthetics

As described in Section 5.1, Aesthetics, from both the Marina Parkway/H Street intersection and the northerly segment of Marina Parkway, the project site is not within westerly oriented views toward San Diego Bay, and therefore, implementation of the Specific Plan and construction and operation of potential future commercial, industrial, technology, and business park development in Planning Areas A, B-1, and B-2 would not result in blockage or substantial interruption of existing available views to San Diego Bay from Marina Parkway. The project site is not readily visible from a state scenic highway and proposed development would not remove or substantially alter scenic resources, including trees, rock outcroppings, and historic buildings. The project would not conflict with aesthetics-related policies of the General Plan. Because implementation of the Rohr Wohl Specific Plan and future development on the project site would be consistent with identified aesthetics-related policies of the Chula Vista

General Plan, potential conflicts with existing regulations governing scenic quality are not anticipated, and impacts would be less than significant. In addition, exterior lighting installed on the project site to support operations would not adversely affect nighttime views in the area, and the project would not result in substantial glare that would adversely affect daytime views in the area.

Under the Build to Existing Land Use Designations Alternative, Planning Area B-1 or B-2 would be developed with allowed uses and the existing warehouse in Planning Area A would remain in its current condition and in operation. As with the proposed project, development in Planning Areas B-1 or B-2 would likely complement the surrounding developments currently underway and would active the waterfront with compatible uses on site, as much as possible. Development under this alternative would also be required to adhere to the design specifications in the Bayfront Specific Plan. Impacts would likely be similar under the Build to Existing Land Use Designations Alternative when compared to the proposed project.

Air Quality

As described in Section 5.2, Air Quality, the proposed project fosters a development pattern that promotes orderly growth by developing on a site with previous industrial uses. As such, the project would not contribute to substantial population and employment growth and associated VMT that was not anticipated for the project site in the existing General Plan. Giving the previous uses that existed on the project site, the anticipated growth in employment and population would be within regional growth forecasts. Implementation of the proposed project would not conflict with or obstruct the implementation of the RAQS and/or applicable portions of the SIP. Daily construction emissions for the project would exceed the SCAQMD's significance thresholds for VOC, primarily from painting emissions. Therefore, the project would have a potentially significant impact related to emissions of criteria air pollutant emissions during construction and mitigation is required to reduce the impact. Mitigation Measure AQ-1 (MM AQ-1) would require the use of super compliant VOC paint, which is 10 mg of VOC per liter. The net daily operational emissions for the project would not exceed the SCAQMD's thresholds for any criteria air pollutant. Therefore, the project would result in a less-than-significant impact related to emissions of criteria air pollutant emissions during operation.

The construction HRA determined that DPM emissions from construction of the project would result in a Maximum Individual Cancer Risk of 20 in 1 million and a Chronic Hazard Index of 0.011. The Chronic Hazard Index would be below the 1.0 significance threshold; however, the project would exceed the cancer risk threshold of 10 in a million and would be potentially significant without mitigation (MM-AQ-2 and MM-AQ-4). The operational HRA determined that DPM emissions from operation of the project would result in a Maximum Individual Cancer Risk of 205 in 1 million and a Chronic Hazard Index of 0.055. The Chronic Hazard Index would be below the 1.0 significance threshold; however, the project would exceed the cancer risk threshold of 10 in a million and would be potentially significant without mitigation (MM-AQ-4, MM-AQ-5, and MM-AQ-6). All impacts would be reduced to less than significant with mitigation.

Under the Build to Existing Land Use Designations Alternative, air pollutant emissions associated with construction, including emissions associated with site preparation, site finishing, and architectural coatings, would still occur. This alternative would likely not avoid significant but mitigable emissions related to exposure from construction emissions, because construction air pollutant emissions would still occur. Similar to the proposed project, implementation of this alternative would introduce uses that would generate operational air pollutant emissions. Compared to the proposed project, the Build to Existing Land Use Designations Alternative would have similar air quality impacts because construction and operation would still occur; it is anticipated that similar mitigation measures would be required to reduce such impacts to less than significant.

Biological Resources

As described in Section 5.3, Biological Resources, the entire project site consists of Tier IV habitats. Tier IV habitats are not considered significant and do not require mitigation. Special-status plant species were not documented within the study area and do not have a moderate or high potential to occur. Two documented special-status wildlife species were found within the study area, American peregrine falcon and osprey. This species has a low potential to nest on site. However, prior to mitigation, impacts would be potentially significant. MM-BIO-1 would be implemented to reduce impacts to a less-than-significant level. Osprey have a moderate potential for nesting on the site; therefore, impacts would be potentially significant prior to mitigation (MM-BIO-2).

The study area has the potential to support nests that would be protected under the MBTA and/or the California Fish and Game Code Section 3503, under which it is unlawful to "take, possess, or needlessly destroy" avian nests or eggs. Thus, if additional vegetation clearing or grading happens during the breeding season, impacts would be potentially significant and mitigation (MM-BIO-3) would be required. The area is not known to support roosting colonies of special-status bats; therefore, construction is not anticipated to substantially affect either species (pallid bat and western mastiff bat). Nonetheless, prior to mitigation (MM-BIO-4 and MM-BIO-5) impacts would be potentially significant.

In addition, compliance with regional and local laws, regulations, and policies, would ensure that indirect impacts would be less than significant; the proposed project would result in no impact to riparian habitats or other sensitive natural communities; the project site does not support areas that could be considered jurisdictional by USACE, RWQCB, the California Coastal Commission, or CDFW; the project does not propose any new barriers, such as new development or fencing, that would prevent wildlife movement; and the proposed project would abide by all local policies and ordinances protecting biological resources in the City of Chula Vista. However, in order to ensure the project's compliance with the MSCP Subarea Plan, mitigation (MM-BIO-6, MSCP Subarea Plan Consistency and Adjacency) would be required. Prior to mitigation impacts would be potentially significant.

The Build to Existing Land Use Designations Alternative would require some additional ground-disturbing activities, similar to the proposed project. As such, this alternative could result in potential direct and/or indirect impacts to nesting birds. This alternative would require implementation of mitigation measures, similar to the proposed project, to reduce potential impacts to sensitive biological resources (pallid bat and western mastiff bat) to less than significant, as well as to ensure compliance with MSCP requirements. Therefore, as development would still occur under this alternative, compared to the proposed project, this alternative would result in similar impacts to biological resources.

Cultural and Tribal Cultural Resources

As described in Section 5.4, Cultural and Tribal Cultural Resources, the potential for intact cultural deposits to exist within native soils to the depths of proposed ground disturbance is unknown. In the event that unanticipated cultural resources are encountered during project implementation, impacts could be potentially significant, and mitigation measures (MM-CUL-1) would be required. The results of the records search did not identify the presence of any previously recorded archaeological sites within the project site. However, prior to mitigation impacts would be potentially significant. While the potential to encounter human remains is low, in the event that human remains are uncovered, impacts would also be potentially significant (MM-CUL-1). On May 3, 2024, the City sent notification letters pursuant to AB 52 and SB 18 to tribes who are traditionally and culturally affiliated with the area of the project. To date, one response from the San Pasqual Tribe was received on May 30, 2024. In response to their request, the City provided the project-specific Cultural Resources Report. The City reached out to the Tribe on July

17, 2024, via e-mail to conduct a formal consultation, and no response has been reciprocated. Consultation with Native American tribes is ongoing. Mitigation would still be required to reduce impacts to less than significant.

Implementation of the Build to Existing Land Use Designations Alternative would require minimal additional ground-disturbing activities would be required, similar to the proposed project. As such, this alternative could result in potential direct and/or indirect significant impacts to cultural or tribal cultural resources. This alternative would require implementation of MM-CUL-1 as proposed for the project to reduce impacts to less than significant. Therefore, compared to the proposed project, this alternative would result in similar impacts to cultural and tribal cultural resources.

Energy

As described in Section 5.5, Energy, construction and operational consumption of electricity, natural gas, and petroleum would not be considered inefficient, wasteful, or otherwise unnecessary and impacts would be less than significant. In addition, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

The Build to Existing Land Use Designations Alternative would require energy consumption during construction of Planning Areas B-1 and B-2. This Alternative would also consume additional energy during operation because development would occur in Planning Areas B-1 and B-2 and the warehouse on Planning Area A would remain in operation as it currently is. As a result, a similar amount of energy would be consumed under this alternative and impacts would be the same compared to the proposed project.

Geology and Soils

As described in Section 5.6, Geology and Soils, impacts associated with landslides, seismic ground shaking, expansive soils and erosion would be less than significant. However, development of the proposed project would require excavations for building foundations and utilities, and any excavations into the potentially fossil-bearing strata within the Bay Point and San Diego Formations could result in potentially significant impacts to paleontological resources, and mitigation measure MM-GEO-1 would be required. Impacts would be reduced to less than significant.

The Build to Existing Land Use Designations Alternative minimal additional ground-disturbing activities would be required, similar to the proposed project. Paleontological resources would have the potential to be disturbed under this alternative and implementation of MM-GEO-1 would be required. Therefore, when compared to the proposed project, the Build to Existing Land Use Designations Alternative would have similar impacts to the proposed project.

Greenhouse Gas Emissions

As described in Section 5.7, Greenhouse Gas Emissions, the project's significance is based on its potential to conflict with the applicable plans adopted for the purpose of reducing GHG emissions, including the City's CAP, the 2022 Scoping Plan, the 2017 Scoping Plan, AB 32 Regulations, SANDAG's RTP/SCS and the City's General Plan. As demonstrated in Section 5.7, the project would not conflict with applicable GHG reduction plans and regulations, accordingly, the impact would be less than significant.

Under the Build to Existing Land Use Designations Alternative, GHG emissions associated with construction, including emissions associated with site preparation, site finishing, and architectural coatings, would still occur. This alternative would still result in GHG emissions related to construction and operation, because development

would occur in Planning Areas B-1 and B-2 and Planning Area A would remain in operation. Compared to the proposed project, the Build to Existing Land Use Designations Alternative would have similar GHG impacts because construction and operation would still occur.

Hazards and Hazardous Materials

As described in Section 5.8, Hazards and Hazardous Materials, construction and operation of the project is not anticipated to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. In addition, because soil contamination would be remediated to San Deigo RWQCB and San Diego Department of Environmental Health and Quality standards prior to project construction, minor grading and trenching would not encounter contaminated soil that could result in a significant hazard to on-site construction personnel or the environment. Further, with compliance with the Construction General Permit and MS4 Permit, project construction would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Lastly, the project would not result in potentially hazardous conditions to nearby schools; result in safety hazards or excessive noise for people working or residing near an airport; result in interference with an adopted emergency response or evacuation plan; or result in the exposure of people or structures to wildfires.

Under the Build to Existing Land Use Designations Alternative, development would occur in Planning Area B-1 and B-2 and potential use or storage of hazardous materials during construction and operation would occur similar to the proposed project. Further, with compliance with the Construction General Permit and MS4 Permit, construction of this alternative would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. This alternative would occur on the same project site, so the same less-than-significant impacts would result as it relates to soil remediation, proximity to a school, conflicts with an emergency response or evacuation plan, and risk of wildfires. Therefore, impacts would be similar under this alternative compared to the proposed project.

Hydrology and Water Quality

As described in Section 5.9, Hydrology and Water Quality, through implementation of the requirements outlined in the CGP, construction-related impacts to surface water and groundwater would be minimized and impacts would be less than significant. With incorporation of water quality BMPs and project design features, the project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. The project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. The proposed storm drain system would be sufficient to satisfy Chula Vista criteria in the post-development condition (Appendix I1) and would not result in erosive scour and associated siltation of San Diego Bay. In addition, the project would not increase the rate of surface runoff; would not exceed the capacity of stormwater drainage systems; would not impede or redirect flood flows; is not located in a flood hazard, tsunami, or seiche zone; and would not interfere with implementation of water quality control plans or sustainable groundwater management plans.

Under the Build to Existing Land Use Designations Alternative, development would occur in Planning Areas B-1 and B-2, and the existing industrial building would remain in operation in Planning Area A. New stormwater infrastructure would be installed and temporary water diversion and sediment capture devices would be used during construction. Similar to the proposed project, engineered stormwater infrastructure would be created to ensure runoff is not polluted and ensure runoff would not exceed the capacity of existing infrastructure. The storm drain system under this alternative would be required to satisfy Chula Vista criteria in the post-development condition and would not

result in erosive scour and associated siltation of San Diego Bay. Potential impacts to hydrology and water quality would be similar when compared to the proposed project.

Land Use

As described in Section 5.10, Land Use and Planning, the proposed project would not result in a significant environmental impact due to division of an established community, a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant.

Rather than revising the land use/zoning designations, the site would remain zoned General Industrial (I) and remain designated Industrial (I) by the General Plan under this alternative. Development under this alternative would be required to be consistent with existing permitted uses in the General Industrial zone. Permitted uses in this zone include food service commercial, convenience sales and service commercial, business and communication service commercial, retail business supply commercial, research and development commercial, general wholesale sales commercial, transportation and warehousing commercial, automotive fee parking commercial, custom industrial, light industrial, general industrial, and essential service civic. Thus, land use impacts under the Build to Existing Land Use Designations Alternative would be the same compared to the proposed project.

Noise

As described in Section 5.11, Noise, short-term construction noise is predicted to be well below the FTA guidance of 80 dBA L_{eq} over an 8-hour period, and therefore is less than significant. Traffic related to construction activities would not result in a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Potential impacts at existing off-site noise-sensitive land uses along roadway segments and project-generated changes to future traffic noise would be less than significant. Noise generated by Planning Areas A, B-1, and B-2 are expected to be below the City's 50 dBA L_{eq} nighttime threshold for multi-family residential land uses. Note that the multi-family residential land use threshold is applied to this analysis due to an absence of City thresholds for hotel land uses. Therefore, impacts associated with stationary operations noise would be less than significant. Lastly, because the predicted vibration level at 70 feet is less than this guidance limit of 0.2 to 0.3 ips PPV and because there are no residential structures adjacent to the project, the risk of vibration damage to nearby structures is considered less than significant.

Under the Build to Existing Land Use Designations Alternative, development would occur in Planning Areas B-1 and B-2, and the existing industrial building would remain in operation in Planning Area A. There would an increase in noise associated with construction and operation, similar to the proposed project, because development would be built and in operation. It is also assumed that predicted vibration level at 70 feet would be less than this guidance limit of 0.2 to 0.3 ips PPV and because there are no residential structures adjacent to the site, the risk of vibration damage to nearby structures under this alternative is considered less than significant. Impacts related to noise would be similar under the Build to Existing Land Use Designations Alternative compared to the proposed project.

Population and Housing

As described in Section 5.12, Population and Housing, once operational, the estimated 1,000 jobs that would result from the proposed project would result in some amount of population growth within the City due to new employment opportunities; however, this population growth would not be considered unplanned because the proposed project would restore what was previously a major job center for the City of Chula Vista. No existing residential uses occupy

the project site as the site was previously developed with industrial buildings, which have since been demolished. The proposed project does not include the construction of any residential units and would not displace existing housing or people or necessitate the construction of replacement housing elsewhere.

Similar to the proposed project, no housing would be developed under the Build to Existing Land Use Designations Alternative and no housing would be displaced. An increase in employment and/or restoration of previous employment opportunities would also be provided under this alternative. Impacts were determined to be less than significant under the proposed project, and impacts would be similar under the Build to Existing Land Use Designations Alternative.

Public Services

As described in Section 5.13, Public Services, the project would not substantially increase the demand of fire protection services requiring the construction of new or expanded fire protection facilities or facilitate the need for additional firefighters and equipment. The City's PFDIF would help cover the cost of new or expanding public facilities within the City, including fire and police facilities. The proposed project would be subject to payment of the PFDIF fees at the rate in effect at the time building permits are issued. Payment of the PFDIF would be necessary to ensure that the project contributes its fair share of the cost of fire police facilities and equipment needed to adequately accommodate increasing demand within the City. In addition, the project site is located within existing CFDs for CVESD and SUHSD, which impose a special tax on property owners to finance both school districts. Any development of new school facilities resulting from these CFDs would be undertaken by the school district at that time. Pursuant to Education Code Section 17620(a)(1), the governing board can authorize the levy of a fee, charge, dedication, or other requirements against any construction within school district boundaries, and with the school district's collection of Statutory and Alternative fees developers can fully mitigate any impacts. Lastly, because the project is considered a commercial development, payment of PFDIF for libraries is not required.

The Build to Existing Land Use Designations Alternative would develop Planning Areas B-1 and B-2 consistent with existing land use and zoning designations and the industrial building in Planning Area A would remain in operation. Payment of the City's PFDIF would still be required under this alternative to help cover the cost of new or expanding public facilities within the City. It is likely that a similar amount of resources would be required to serve development under this alternative as the proposed project and impacts would be the same.

Recreation

As described in Section 5.14, Recreation, per CVMC Section 17.10.120, the proposed project would not be required to pay park development fees because there are no proposed residences within the project. Therefore, because the proposed project does not include a new residential population and would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Impacts would be less than significant.

The Build to Existing Land Use Designations Alternative would develop Planning Areas B-1 and B-2 consistent with existing land use and zoning designations and the industrial building in Planning Area A would remain in operation. Residential uses are not currently an allowed use under the existing zoning or General Plan land use, so similar to the proposed project, the Build to Existing Land Use Designations Alternative would not in new population or residences. Therefore, development under this alternative would not be required to pay park development impact fees. Impacts would be similar to the proposed project.

Transportation

As described in Section 5.15, Transportation, the proposed project would not conflict with existing or proposed bicycle, pedestrian, or transit facilities in its vicinity. In addition, the proposed project (A, B1, and B2) is located in census tract 12600. The SANDAG average VMT per employee is 18.90 and the threshold of 85 percent would be 16.06 VMT per employee or below. The average VMT per employee of this tract is 15.91, which is below the regional average VMT per employee of 18.90 as well as below the VMT per employee threshold (i.e., 85 percent of the reginal mean) of 16.06. Therefore, it can be concluded that the proposed project is in a VMT efficient area for all employee uses. Because the proposed project would meet the VMT screening criteria described above, a more detailed VMT analysis is not required, and can be presumed to result in a less-than-significant VMT impact.

The Build to Existing Land Use Designations Alternative would develop Planning Areas B-1 and B-2 consistent with existing land use and zoning designations and the industrial building in Planning Area A would remain in operation. Additional trips would be generated during construction and operation similar to the proposed project. Similarly, the average VMT per employee of this tract is 15.91, which is below the regional average VMT per employee of 18.90 as well as below the VMT per employee threshold (i.e., 85 percent of the reginal mean) of 16.06. Therefore, it can be concluded that similar to the proposed project, this alternative is in a VMT efficient area for all employee uses. Because this alternative would meet the VMT screening criteria, a more detailed VMT analysis would not be required, and can be presumed to result in a less-than-significant VMT impact. Thus, when compared to the proposed project, the Build to Existing Land Use Designations Alternative would result in similar impacts related to traffic and circulation.

As shown in the LMA, the project would be fully responsible for signalizing the Bay Boulevard and G Street and Project Driveway and H Street intersections and retiming the signals at the I-5 Northbound Ramps and E Street, Bay Boulevard and H Street, I-5 Northbound Ramps and H Street, and I-5 Northbound and Southbound Ramps and J Street intersections. The Project would contribute its fair share towards the construction of a traffic signal or roundabout at the Bay Boulevard and F Street. The Project would contribute its fair share towards the construction of a traffic signal at the J Street and L Street intersections with Bay Boulevard. All proposed improvements would achieve LOS D or better conditions during both peak periods except for the roundabout at Bay Boulevard and F Street. The improvements identified in the LMA are recommendations and the final improvement plan and project funding responsibility will be defined and documented in a separate Rohr/Wohl Specific Plan Transportation Conditions of Approval memo.

The Build to Existing Land Use Designations Alternative would still add trips to the surrounding streets and intersections, and would still be required to pay fair share fees or construct improvements as determined to be necessary. Impacts would not be reduced under this alternative.

Utilities and Service Systems

As described in Section 5.16, Utilities and Service Systems, the proposed project would have adequate water, wastewater, stormwater, and telecommunication infrastructure. The project would be required to comply with all local and state regulations regarding solid waste and the surrounding landfills would have capacity to serve the project. Impacts would be less than significant.

The Build to Existing Land Use Designations Alternative would develop Planning Areas B-1 and B-2 consistent with existing land use and zoning designations and the industrial building in Planning Area A would remain in operation. Additional water supply would be needed, wastewater would be generated, and solid waste would be disposed of during

construction or operation under this alternative. Depending on what was developed in Planning Areas B-1 and B-2 it is likely that impacts would be similar regarding utilities and services systems when compared to the proposed project.

10.4.3 Exclusion of Hotel in Planning Area B-2 Alternative

The following alternative would allow some of the project's proposed uses for Planning Area B-2 (such as restaurants, office space, and visitor serving uses) other than a hotel. Exclusion of a potential hotel in Planning Area B-2 would, because of the unique operational characteristics of a hotel, substantially reduce operational impacts associated with air quality, GHG emissions, traffic, and utilities (water supply, wastewater service, and solid waste generation). All of the same approvals and amendments to existing documents as the proposed project would be required under this alternative. The approval of the Rohr Wohl Specific Plan would amend the City's zoning for the property to allow the development of the proposed project with commercial, industrial, and office uses. This would remain the same under the Exclusion of Hotel in Planning Area B-2 Alternative. Site access, internal circulation, and connection to existing utilities would still occur as detailed in Chapter 4, Project Description.

Aesthetics

As described in Section 5.1, Aesthetics, from both the Marina Parkway/H Street intersection and the northerly segment of Marina Parkway, the project site is not within westerly oriented views toward San Diego Bay, and therefore, implementation of the Specific Plan and construction and operation of potential future commercial, industrial, technology, and business park development in Planning Areas A, B-1, and B-2 would not result in blockage or substantial interruption of existing available views to San Diego Bay from Marina Parkway. The project site is not readily visible from a state scenic highway and proposed development would not remove or substantially alter scenic resources, including trees, rock outcroppings, and historic buildings. The project would not conflict with aesthetics-related policies of the General Plan. Because implementation of the Rohr Wohl Specific Plan and future development on the project site would be consistent with identified aesthetics-related policies of the Chula Vista General Plan, potential conflicts with existing regulations governing scenic quality are not anticipated, and impacts would be less than significant. In addition, exterior lighting installed on the project site to support operations would not adversely affect nighttime views in the area, and the project would not result in substantial glare that would adversely affect daytime views in the area.

Under the Exclusion of Hotel in Planning Area B-2 Alternative, Planning Area B-1 and B-2 would still be developed with allowed uses and the existing warehouse in Planning Area A would remain in its current condition and in operation. As with the proposed project, development in Planning Areas B-1 or B-2 would complement the surrounding developments currently underway and would active the waterfront with compatible uses on site, although no hotel would be constructed. Development under this alternative would also be required to adhere to the design specifications in the Bayfront Specific Plan. Impacts would likely be similar under the Exclusion of Hotel in Planning Area B-2 Alternative when compared to the proposed project.

Air Quality

As described in Section 5.2, Air Quality, the proposed project fosters a development pattern that promotes orderly growth by developing on a site with previous industrial uses. As such, the project would not contribute to substantial population and employment growth and associated VMT that was not anticipated for the project site in the existing General Plan. Giving the previous uses that existed on the project site, the anticipated growth in employment and population would be within regional growth forecasts. Implementation of the proposed project would not conflict with or obstruct the implementation of the RAQS and/or applicable portions of the SIP. Daily construction emissions

for the project would exceed the SCAQMD's significance thresholds for VOC, primarily from painting emissions. Therefore, the project would have a potentially significant impact related to emissions of criteria air pollutant emissions during construction and mitigation is required to reduce the impact. Mitigation Measure AQ-1 (MM AQ-1) would require the use of super compliant VOC paint, which is 10 mg of VOC per liter. The net daily operational emissions for the project would not exceed the SCAQMD's thresholds for any criteria air pollutant. Therefore, the project would result in a less-than-significant impact related to emissions of criteria air pollutant emissions during operation.

The construction HRA determined that DPM emissions from construction of the project would result in a Maximum Individual Cancer Risk of 20 in 1 million and a Chronic Hazard Index of 0.011. The Chronic Hazard Index would be below the 1.0 significance threshold; however, the project would exceed the cancer risk threshold of 10 in a million and would be potentially significant without mitigation (MM-AQ-2 and MM-AQ-4). The operational HRA determined that DPM emissions from operation of the project would result in a Maximum Individual Cancer Risk of 205 in 1 million and a Chronic Hazard Index of 0.055. The Chronic Hazard Index would be below the 1.0 significance threshold; however, the project would exceed the cancer risk threshold of 10 in a million and would be potentially significant without mitigation (MM-AQ-4, MM-AQ-5, and MM-AQ-6). All impacts would be reduced to less than significant with mitigation.

Under the Exclusion of Hotel in Planning Area B-2 Alternative, air pollutant emissions associated with construction, including emissions associated with site preparation, site finishing, and architectural coatings, would still occur. This alternative would not avoid significant but mitigable emissions related to exposure from construction emissions, because construction air pollutant emissions would still occur. Emissions from traffic trips would be reduced when compared to the proposed project due to the reduction in daily trips associated with a hotel. Implementation of this alternative would still introduce uses that would generate operational air pollutant emissions, but not to the same extent that a hotel would. Compared to the proposed project, the Exclusion of Hotel in Planning Area B-2 Alternative, would have reduced impacts, because a hotel would not be built and a less intensive development, consistent with the Specific Plan, would be built instead.

Biological Resources

As described in Section 5.3, Biological Resources, The entire project site consists of Tier IV habitats. Tier IV habitats are not considered significant and do not require mitigation. Special-status plant species were not documented within the study area and do not have a moderate or high potential to occur. Two documented special-status wildlife species were found within the study area, American peregrine falcon and osprey. This species has a low potential to nest on site. However, prior to mitigation, impacts would be potentially significant. MM-BIO-1 would be implemented to reduce impacts to a less-than-significant level. Osprey have a moderate potential for nesting on the site; therefore, impacts would be potentially significant prior to mitigation (MM-BIO-2).

The study area has the potential to support nests that would be protected under the MBTA and/or the California Fish and Game Code Section 3503, under which it is unlawful to "take, possess, or needlessly destroy" avian nests or eggs. Thus, if additional vegetation clearing or grading happens during the breeding season, impacts would be potentially significant and mitigation (MM-BIO-3) would be required. The area is not known to support roosting colonies of special-status bats; therefore, construction is not anticipated to substantially affect either species (pallid bat and western mastiff bat). Nonetheless, prior to mitigation (MM-BIO-4 and MM-BIO-5) impacts would be potentially significant.

In addition, compliance with regional and local laws, regulations, and policies, would ensure that indirect impacts would be less than significant; the proposed project would result in no impact to riparian habitats or other sensitive

natural communities; the project site does not support areas that could be considered jurisdictional by USACE, RWQCB, the California Coastal Commission, or CDFW; the project does not propose any new barriers, such as new development or fencing, that would prevent wildlife movement; and the proposed project would abide by all local policies and ordinances protecting biological resources in the City of Chula Vista. However, in order to ensure the project's compliance with the MSCP Subarea Plan, mitigation (MM-BIO-6, MSCP Subarea Plan Consistency and Adjacency) would be required. Prior to mitigation impacts would be potentially significant.

The Exclusion of Hotel in Planning Area B-2 Alternative would require some additional ground-disturbing activities, similar to the proposed project. As such, this alternative could result in potential direct and/or indirect impacts to nesting birds. This alternative would require implementation of mitigation measures, similar to the proposed project. Therefore, as development would still occur under this alternative, compared to the proposed project, this alternative would result in similar impacts to biological resources and mitigation would be required.

Cultural and Tribal Cultural Resources

As described in Section 5.4, Cultural and Tribal Cultural Resources, the potential for intact cultural deposits to exist within native soils to the depths of proposed ground disturbance is unknown. In the event that unanticipated cultural resources are encountered during project implementation, impacts could be potentially significant, and mitigation measures (MM-CUL-1) would be required. The results of the records search did not identify the presence of any previously recorded archaeological sites within the project site. However, prior to mitigation impacts would be potentially significant. While the potential to encounter human remains is low, in the event that human remains are uncovered, impacts would also be potentially significant (MM-CUL-1). On May 3, 2024, the City sent notification letters pursuant to AB 52 and SB 18 to tribes who are traditionally and culturally affiliated with the area of the project. To date, one response from the San Pasqual Tribe was received on May 30, 2024. In response to their request, the City provided the project-specific Cultural Resources Report. The City reached out to the Tribe on July 17, 2024, via e-mail to conduct a formal consultation, and no response has been reciprocated. Consultation with Native American tribes is ongoing. Mitigation would still be required to reduce impacts to less than significant.

Under the Exclusion of Hotel in Planning Area B-2 Alternative minimal additional ground-disturbing activities would be required, similar to the proposed project. As such, this alternative could result in potential direct and/or indirect significant impacts to cultural or tribal cultural resources. This alternative would require implementation of MM-CUL-1 as proposed for the project. Therefore, compared to the proposed project, this alternative would result in the same impacts to cultural and tribal cultural resources.

Energy

As described in Section 5.5, Energy, construction and operational consumption of electricity, natural gas, and petroleum would not be considered inefficient, wasteful, or otherwise unnecessary and impacts would be less than significant. In addition, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

The Exclusion of Hotel in Planning Area B-2 Alternative would require energy consumption during construction of Planning Areas B-1 and B-2. This Alternative would also consume additional energy during operation because development would occur in Planning Areas B-1 and B-2 and the warehouse on Planning Area A would remain in operation as it currently is. As a result, a similar amount of energy would be consumed under this alternative and impacts would be the same compared to the proposed project.

Geology and Soils

As described in Section 5.6, Geology and Soils, impacts associated with landslides, seismic ground shaking, expansive soils and erosion would be less than significant. However, development of the proposed project would require excavations for building foundations and utilities, and any excavations into the potentially fossil-bearing strata within the Bay Point and San Diego Formations could result in potentially significant impacts to paleontological resources, and mitigation measure MM-GEO-1 would be required. Impacts would be reduced to less than significant.

Under the Exclusion of Hotel in Planning Area B-2 Alternative minimal additional ground-disturbing activities would be required, similar to the proposed project. Paleontological resources would have the potential to be disturbed under this alternative and implementation of MM-GEO-1 would be required. Therefore, when compared to the proposed project, the Exclusion of Hotel in Planning Area B-2 Alternative would have the same impacts to the proposed project.

Greenhouse Gas Emissions

As described in Section 5.7, Greenhouse Gas Emissions, the project's significance is based on its potential to conflict with the applicable plans adopted for the purpose of reducing GHG emissions, including the City's CAP, the 2022 Scoping Plan, the 2017 Scoping Plan, AB 32 Regulations, SANDAG's RTP/SCS and the City's General Plan. As demonstrated in Section 5.7, the project would not conflict with applicable GHG reduction plans and regulations, accordingly, the impact would be less than significant.

Under the Exclusion of Hotel in Planning Area B-2 Alternative, GHG emissions associated with construction, including emissions associated with site preparation, site finishing, and architectural coatings, would still occur. GHG emissions related to construction and operation would be similar, because development would occur in Planning Areas B-1 and B-2 and Planning Area A would remain in operation. Emissions from traffic trips would be reduced when compared to the proposed project due to the reduction in daily trips associated with a hotel. Implementation of this alternative would still introduce uses that would generate operational and vehicle air pollutant emissions, but not to the same extent that a hotel would. Compared to the proposed project, the Exclusion of Hotel in Planning Area B-2 Alternative, would have reduced impacts, because a hotel would not be built and a less intensive development, consistent with the Specific Plan, would be built instead.

Hazards and Hazardous Materials

As described in Section 5.8, Hazards and Hazardous Materials, construction and operation of the project is not anticipated to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. In addition, because soil contamination would be remediated to San Deigo RWQCB and San Diego Department of Environmental Health and Quality standards prior to project construction, minor grading and trenching would not encounter contaminated soil that could result in a significant hazard to on-site construction personnel or the environment. Further, with compliance with the Construction General Permit and MS4 Permit, project construction would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Lastly, the project would not result in potentially hazardous conditions to nearby schools; result in safety hazards or excessive noise for people working or residing near an airport; result in interference with an adopted emergency response or evacuation plan; or result in the exposure of people or structures to wildfires.

Under the Exclusion of Hotel in Planning Area B-2 Alternative, development would occur in Planning Area B-1 and B-2 and potential use or storage of hazardous materials during construction and operation would occur similar to the proposed project. However, with compliance with the Construction General Permit and MS4 Permit, construction of this alternative would not create a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment, similar to the proposed project. This alternative would occur on the same project site, so the same less-than-significant impacts would result as it relates to soil remediation, proximity to a school, conflicts with an emergency response or evacuation plan, and risk of wildfires. Therefore, impacts would be similar under this alternative compared to the proposed project.

Hydrology and Water Quality

As described in Section 5.9, Hydrology and Water Quality, through implementation of the requirements outlined in the CGP, construction-related impacts to surface water and groundwater would be minimized and impacts would be less than significant. With incorporation of water quality BMPs and project design features, the project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. The project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. The proposed storm drain system would be sufficient to satisfy Chula Vista criteria in the post-development condition (Appendix I1) and would not result in erosive scour and associated siltation of San Diego Bay. In addition, the project would not increase the rate of surface runoff; would not exceed the capacity of stormwater drainage systems; would not impede or redirect flood flows; is not located in a flood hazard, tsunami, or seiche zone; and would not interfere with implementation of water quality control plans or sustainable groundwater management plans.

Under the Exclusion of Hotel in Planning Area B-2 Alternative, development would occur in Planning Areas B-1 and B-2, and the existing industrial building would remain in operation in Planning Area A. New stormwater infrastructure would be installed and temporary water diversion and sediment capture devices would be used during construction. Similar to the proposed project, engineered stormwater infrastructure would be created to ensure runoff is not polluted and ensure runoff would not exceed the capacity of existing infrastructure. The storm drain system under this alternative would be required to satisfy Chula Vista criteria in the post-development condition and would not result in erosive scour and associated siltation of San Diego Bay. Potential impacts to hydrology and water quality would be similar when compared to the proposed project.

Land Use

As described in Section 5.10, Land Use and Planning, the proposed project would not result in a significant environmental impact due to division of an established community, a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant.

Under the Exclusion of Hotel in Planning Area B-2 Alternative, development in Planning Areas B-1 and B-2 would still occur in compliance with the Specific Plan (Appendix B), although no hotel use would be allowed, or would be constructed. Regardless of the exclusion of the hotel, development would not conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. A hotel arguably serves the policies of the Coastal Act better by allowing more people to visit the area near the Bay; however, similar to the proposed project, land use impacts would be less than significant.

Noise

As described in Section 5.11, Noise, short-term construction noise is predicted to be well below the FTA guidance of 80 dBA L_{eq} over an 8-hour period, and therefore is less than significant. Traffic related to construction activities would not result in a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Potential impacts at existing off-site noise-sensitive land uses along roadway segments and project-generated changes to future traffic noise would be less than significant. Noise generated by Planning Areas A, B-1, and B-2 are expected to be below the City's 50 dBA L_{eq} nighttime threshold for multi-family residential land uses. Note that the multi-family residential land use threshold is applied to this analysis due to an absence of City thresholds for hotel land uses. Therefore, impacts associated with stationary operations noise would be less than significant. Lastly, because the predicted vibration level at 70 feet is less than this guidance limit of 0.2 to 0.3 ips PPV and because there are no residential structures adjacent to the project, the risk of vibration damage to nearby structures is considered less than significant.

Under the Exclusion of Hotel in Planning Area B-2 Alternative, development would still occur in Planning Areas B-1 and B-2, and the existing industrial building would remain in operation in Planning Area A. There would be an increase in noise associated with construction and operation because new land uses would be built and in operation. It is also assumed that predicted vibration level at 70 feet would be less than this guidance limit of 0.2 to 0.3 ips PPV and because there are no residential structures adjacent to the site, the risk of vibration damage to nearby structures under this alternative is considered less than significant. Regardless of the exclusion of the hotel, impacts related to noise would be similar under this alternative when compared to the proposed project.

Population and Housing

As described in Section 5.12, Population and Housing, once operational, the estimated 1,000 jobs that would result from the proposed project would result in some amount of population growth within the City due to new employment opportunities; however, this population growth would not be considered unplanned because the proposed project would restore what was previously a major job center for the City of Chula Vista. No existing residential uses occupy the project site as the site was previously developed with industrial buildings, which have since been demolished. The proposed project does not include the construction of any residential units and would not displace existing housing or people or necessitate the construction of replacement housing elsewhere.

Similar to the proposed project, no housing would be developed under the Exclusion of Hotel in Planning Area B-2 Alternative and no housing would be displaced. An increase in employment and/or restoration of previous employment opportunities would also be provided under this alternative. Impacts were determined to be less than significant under the proposed project, and impacts would be similar under the Exclusion of Hotel in Planning Area B-2 Alternative.

Public Services

As described in Section 5.13, Public Services, the project would not substantially increase the demand of fire protection services requiring the construction of new or expanded fire protection facilities or facilitate the need for additional firefighters and equipment. The City's PFDIF would help cover the cost of new or expanding public facilities within the City, including fire and police facilities. The proposed project would be subject to payment of the PFDIF fees at the rate in effect at the time building permits are issued. Payment of the PFDIF would be necessary to ensure that the project contributes its fair share of the cost of fire police facilities and equipment needed to

adequately accommodate increasing demand within the City. In addition, the project site is located within existing CFDs for CVESD and SUHSD, which impose a special tax on property owners to finance both school districts. Any development of new school facilities resulting from these CFDs would be undertaken by the school district at that time. Pursuant to Education Code Section 17620(a)(1), the governing board can authorize the levy of a fee, charge, dedication, or other requirements against any construction within school district boundaries, and with the school district's collection of Statutory and Alternative fees developers can fully mitigate any impacts. Lastly, because the project is considered a commercial development, payment of PFDIF for libraries is not required.

Under the Exclusion of Hotel in Planning Area B-2 Alternative development would still occur in Planning Areas B-1 and B-2 consistent with land use and zoning designations as outlined in the Specific Plan (Appendix B) and the industrial building in Planning Area A would remain in operation. Payment of the City's PFDIF would still be required under this alternative to help cover the cost of new or expanding public facilities within the City. It is likely the same amount of resources would be required to serve development under this alternative as the proposed project and impacts would be similar.

Recreation

As described in Section 5.14, Recreation, per CVMC Section 17.10.120, the proposed project would not be required to pay park development fees because there are no proposed residences within the project. Therefore, because the proposed project does not include a new residential population and would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Impacts would be less than significant.

Under the Exclusion of Hotel in Planning Area B-2 Alternative development would still occur in Planning Areas B-1 and B-2 consistent with land use and zoning designations as outlined in the Specific Plan (Appendix B) and the industrial building in Planning Area A would remain in operation. Residential uses are not currently an allowed use under the existing zoning or General Plan land use, so similar to the proposed project, the Exclusion of Hotel in Planning Area B-2 Alternative would not result in new population or residences, which would require additional recreational space or payment of fees. Therefore, development under this alternative would not be required to pay park development impact fees. Impacts would be similar to the proposed project.

Transportation

As described in Section 5.15, Transportation, the proposed project would not conflict with existing or proposed bicycle, pedestrian, or transit facilities in its vicinity. In addition, the proposed project (A, B1, and B2) is located in census tract 12600. The SANDAG average VMT per employee is 18.90 and the threshold of 85 percent would be 16.06 VMT per employee or below. The average VMT per employee of this tract is 15.91, which is below the regional average VMT per employee of 18.90 as well as below the VMT per employee threshold (i.e., 85 percent of the reginal mean) of 16.06. Therefore, it can be concluded that the proposed project is in a VMT efficient area for all employee uses. Because the proposed project would meet the VMT screening criteria described above, a more detailed VMT analysis is not required, and can be presumed to result in a less-than-significant VMT impact.

Under the Exclusion of Hotel in Planning Area B-2 Alternative development would still occur in Planning Areas B-1 and B-2 consistent with land use and zoning designations as outlined in the Specific Plan (Appendix B) and the industrial building in Planning Area A would remain in operation. By excluding the hotel, a reduction in approximately 1,400 average daily trips would occur, which would be a substantial reduction in cars to the surrounding roadway network. However, traffic impacts under CEQA are based on VMT and the average VMT per employee of this tract

is 15.91, which is below the regional average VMT per employee of 18.90 as well as below the VMT per employee threshold (i.e., 85 percent of the reginal mean) of 16.06. Therefore, it can be concluded that similar to the proposed project, this alternative is in a VMT efficient area for all employee uses. Because this alternative would meet the VMT screening criteria, a more detailed VMT analysis would not be required, and can be presumed to result in a less-than-significant VMT impact. Thus, when compared to the proposed project, the Exclusion of Hotel in Planning Area B-2 Alternative would result in similar VMT impacts.

As shown in the LMA, the project would be fully responsible for signalizing the Bay Boulevard and G Street and Project Driveway and H Street intersections and retiming the signals at the I-5 Northbound Ramps and E Street, Bay Boulevard and H Street, I-5 Northbound Ramps and H Street, and I-5 Northbound and Southbound Ramps and J Street intersections. The Project would contribute its fair share towards the construction of a traffic signal or roundabout at the Bay Boulevard and F Street. The Project would contribute its fair share towards the construction of a traffic signal at the J Street and L Street intersections with Bay Boulevard. All proposed improvements would achieve LOS D or better conditions during both peak periods except for the roundabout at Bay Boulevard and F Street. The improvements identified in the LMA are recommendations and the final improvement plan and project funding responsibility will be defined and documented in a separate Rohr/Wohl Specific Plan Transportation Conditions of Approval memo.

The Exclusion of Hotel in Planning Area B-2 Alternative would result in a reduction in 1,400 daily trips associated with the hotel, but another, less intensive land use, consistent with the Specific Plan, would be built instead. Therefore, traffic trips would be reduced when compared to the proposed project. For example, if a 100,000 square-foot warehouse was built instead of a hotel, average daily trips would be reduced by 900 trips (5 trips/ksf for warehouse uses). Therefore, implementation of this alternative would still introduce uses that would generate daily trips, albeit to a lesser degree. With a substantial reduction in trips realized, there would likely be less improvements and fair share payments required. Traffic implications would not be avoided under this alternative, but they would be reduced.

Utilities and Service Systems

As described in Section 5.16, Utilities and Service Systems, the proposed project would have adequate water, wastewater, stormwater, and telecommunication infrastructure. The project would be required to comply with all local and state regulations regarding solid waste and the surrounding landfills would have capacity to serve the project. Impacts would be less than significant.

Under the Exclusion of Hotel in Planning Area B-2 Alternative development would still occur in Planning Areas B-1 and B-2 consistent with land use and zoning designations as outlined in the Specific Plan (Appendix B) and the industrial building in Planning Area A would remain in operation. Additional water supply would be needed, wastewater would be generated, and solid waste would be disposed of during construction or operation under this alternative. Depending on what was developed in place of the hotel use, it's anticipated that impacts would be similar regarding utilities and services systems when compared to the proposed project.

10.4.4 Exclusion of All Planning Area B-2 Alternative

Exclusion of Planning Area B-2 entirely would have reduced construction and operational impacts compared to the proposed project in the near-term. However, B-2 would remain vacant, zoned General Industrial, and future development could still occur in Planning Area B-2, albeit would not be required to adhere to the design guidelines outlined in the Specific Plan. This alternative would reduce near-term traffic impacts because average daily trips

would be reduced by 5,000 trips. There would also be a reduction in near-term construction emissions and noise; however, development would still likely occur in Planning Area B-2 at a later date, consistent with the underlying zoning and land use. Therefore, it's unlikely that emissions and noise would be reduced in the long-term. Impacts would not be substantially reduced under this alternative when compared to the proposed project.

Aesthetics

As described in Section 5.1, Aesthetics, from both the Marina Parkway/H Street intersection and the northerly segment of Marina Parkway, the project site is not within westerly oriented views toward San Diego Bay, and therefore, implementation of the Specific Plan and construction and operation of potential future commercial, industrial, technology, and business park development in Planning Areas A, B-1, and B-2 would not result in blockage or substantial interruption of existing available views to San Diego Bay from Marina Parkway. The project site is not readily visible from a state scenic highway and proposed development would not remove or substantially alter scenic resources, including trees, rock outcroppings, and historic buildings. The project would not conflict with aesthetics-related policies of the General Plan. Because implementation of the Rohr Wohl Specific Plan and future development on the project site would be consistent with identified aesthetics-related policies of the Chula Vista General Plan, potential conflicts with existing regulations governing scenic quality are not anticipated, and impacts would be less than significant. In addition, exterior lighting installed on the project site to support operations would not adversely affect nighttime views in the area, and the project would not result in substantial glare that would adversely affect daytime views in the area.

Under the Exclusion of Planning Area B-2 Alternative, Planning Area B-1 would still be developed with allowed uses as specified in the Specific Plan (Appendix B) and the existing warehouse in Planning Area A would remain in its current condition and in operation. As with the proposed project, development in Planning Areas B-1 would complement the surrounding developments currently underway and would active the waterfront with compatible uses on site. Planning Area B-2 would remain a vacant, graded, and future development would not be required to adhere to the design guidelines as outlined in the Specific Plan (Appendix B). Leaving Planning Area B-2 vacant, while all other surrounding parcels in the bayfront are being developed with compatible uses, would likely result in a greater impact to the aesthetics of the area.

Air Quality

As described in Section 5.2, Air Quality, the proposed project fosters a development pattern that promotes orderly growth by developing on a site with previous industrial uses. As such, the project would not contribute to substantial population and employment growth and associated VMT that was not anticipated for the project site in the existing General Plan. Giving the previous uses that existed on the project site, the anticipated growth in employment and population would be within regional growth forecasts. Implementation of the proposed project would not conflict with or obstruct the implementation of the RAQS and/or applicable portions of the SIP. Daily construction emissions for the project would exceed the SCAQMD's significance thresholds for VOC, primarily from painting emissions. Therefore, the project would have a potentially significant impact related to emissions of criteria air pollutant emissions during construction and mitigation is required to reduce the impact. Mitigation Measure AQ-1 (MM AQ-1) would require the use of super compliant VOC paint, which is 10 mg of VOC per liter. The net daily operational emissions for the project would not exceed the SCAQMD's thresholds for any criteria air pollutant. Therefore, the project would result in a less-than-significant impact related to emissions of criteria air pollutant emissions during operation.

The construction HRA determined that DPM emissions from construction of the project would result in a Maximum Individual Cancer Risk of 20 in 1 million and a Chronic Hazard Index of 0.011. The Chronic Hazard Index would be

below the 1.0 significance threshold; however, the project would exceed the cancer risk threshold of 10 in a million and would be potentially significant without mitigation (MM-AQ-2 and MM-AQ-4). The operational HRA determined that DPM emissions from operation of the project would result in a Maximum Individual Cancer Risk of 205 in 1 million and a Chronic Hazard Index of 0.055. The Chronic Hazard Index would be below the 1.0 significance threshold; however, the project would exceed the cancer risk threshold of 10 in a million and would be potentially significant without mitigation (MM-AQ-4, MM-AQ-5, and MM-AQ-6). All impacts would be reduced to less than significant with mitigation.

Under the Exclusion of Planning Area B-2 Alternative, air pollutant emissions associated with construction, would be reduced, because no development would occur in Planning Area B-2. This alternative would not avoid significant but mitigable emissions related to exposure from construction emissions, because construction air pollutant emissions would still result from the development of Planning Area B-1. Emissions from traffic trips would be reduced when compared to the proposed project due to the reduction in daily trips; however, similar to the proposed project, implementation of this alternative would still introduce uses on Planning Area B-1 that would generate operational air pollutant emissions. In addition, although nothing would be built under this alternative in Planning Area B-2, development would likely occur at some point, consistent with the underlying land use and zoning. Therefore, compared to the proposed project, the Exclusion of Planning Area B-2 Alternative, would have reduced air quality impacts in the near-term and similar air quality impacts in the long-term. Impacts would not be substantially reduced.

Biological Resources

As described in Section 5.3, Biological Resources, The entire project site consists of Tier IV habitats. Tier IV habitats are not considered significant and do not require mitigation. Special-status plant species were not documented within the study area and do not have a moderate or high potential to occur. Two documented special-status wildlife species were found within the study area, American peregrine falcon and osprey. This species has a low potential to nest on site. However, prior to mitigation, impacts would be potentially significant. MM-BIO-1 would be implemented to reduce impacts to a less-than-significant level. Osprey have a moderate potential for nesting on the site; therefore, impacts would be potentially significant prior to mitigation (MM-BIO-2).

The study area has the potential to support nests that would be protected under the MBTA and/or the California Fish and Game Code Section 3503, under which it is unlawful to “take, possess, or needlessly destroy” avian nests or eggs. Thus, if additional vegetation clearing or grading happens during the breeding season, impacts would be potentially significant and mitigation (MM-BIO-3) would be required. The area is not known to support roosting colonies of special-status bats; therefore, construction is not anticipated to substantially affect either species (pallid bat and western mastiff bat). Nonetheless, prior to mitigation (MM-BIO-4 and MM-BIO-5) impacts would be potentially significant.

In addition, compliance with regional and local laws, regulations, and policies, would ensure that indirect impacts would be less than significant; the proposed project would result in no impact to riparian habitats or other sensitive natural communities; the project site does not support areas that could be considered jurisdictional by USACE, RWQCB, the California Coastal Commission, or CDFW; the project does not propose any new barriers, such as new development or fencing, that would prevent wildlife movement; and the proposed project would abide by all local policies and ordinances protecting biological resources in the City of Chula Vista. However, in order to ensure the project’s compliance with the MSCP Subarea Plan, mitigation (MM-BIO-6, MSCP Subarea Plan Consistency and Adjacency) would be required. Prior to mitigation impacts would be potentially significant.

The Exclusion of Planning Area B-2 Alternative would require some additional ground-disturbing activities in Planning Area B-1, but no additional ground-disturbing activities would occur in Planning Area B-2. This alternative could still result in potential direct and/or indirect impacts to nesting birds. This alternative would still require implementation of mitigation measures, similar to the proposed project. Therefore, as development would still occur under this alternative, compared to the proposed project, this alternative would result in similar impacts to biological resources and mitigation would be required.

Cultural and Tribal Cultural Resources

As described in Section 5.4, Cultural and Tribal Cultural Resources, the potential for intact cultural deposits to exist within native soils to the depths of proposed ground disturbance is unknown. In the event that unanticipated cultural resources are encountered during project implementation, impacts could be potentially significant, and mitigation measures (MM-CUL-1) would be required. The results of the records search did not identify the presence of any previously recorded archaeological sites within the project site. However, prior to mitigation impacts would be potentially significant. While the potential to encounter human remains is low, in the event that human remains are uncovered, impacts would also be potentially significant (MM-CUL-1). On May 3, 2024, the City sent notification letters pursuant to AB 52 and SB 18 to tribes who are traditionally and culturally affiliated with the area of the project. To date, one response from the San Pasqual Tribe was received on May 30, 2024. In response to their request, the City provided the project-specific Cultural Resources Report. The City reached out to the Tribe on July 17, 2024, via e-mail to conduct a formal consultation, and no response has been reciprocated. Consultation with Native American tribes is ongoing. Mitigation would still be required to reduce impacts to less than significant.

Under the Exclusion of Planning Area B-2 Alternative minimal additional ground-disturbing activities would be required and it would be limited to Planning Area B-1. As such, this alternative could still result in potential direct and/or indirect significant impacts to cultural or tribal cultural resources. This alternative would require implementation of MM-CUL-1 as proposed for the project. Therefore, compared to the proposed project, this alternative would result in similar impacts to cultural and tribal cultural resources.

Energy

As described in Section 5.5, Energy, construction and operational consumption of electricity, natural gas, and petroleum would not be considered inefficient, wasteful, or otherwise unnecessary and impacts would be less than significant. In addition, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

The Exclusion of Planning Area B-2 Alternative would reduce the amount of energy consumption required during construction because construction would only occur on Planning Area B-1. This Alternative would still consume additional energy during operation because development would occur in Planning Area B-1 and the warehouse on Planning Area A would remain in operation as it currently is. In addition, although nothing would be built under this alternative, development would likely occur at some point, consistent with the underlying land use and zoning. Therefore, compared to the proposed project, the Exclusion of Planning Area B-2 Alternative, would have reduced energy impacts in the near-term and similar energy impacts in the long-term. Impacts would not be substantially reduced.

Geology and Soils

As described in Section 5.6, Geology and Soils, impacts associated with landslides, seismic ground shaking, expansive soils and erosion would be less than significant. However, development of the proposed project would

require excavations for building foundations and utilities, and any excavations into the potentially fossil-bearing strata within the Bay Point and San Diego Formations could result in potentially significant impacts to paleontological resources, and mitigation measure MM-GEO-1 would be required. Impacts would be reduced to less than significant.

Under the Exclusion of Planning Area B-2 Alternative minimal additional ground-disturbing activities would be required for Planning Area B-1, but no additional ground disturbance would occur in Planning Area B-2. However, paleontological resources would have the potential to be disturbed under this alternative and implementation of MM-GEO-1 would still be required. Therefore, when compared to the proposed project, the Exclusion of Planning Area B-2 Alternative would have similar impacts to the proposed project.

Greenhouse Gas Emissions

As described in Section 5.7, Greenhouse Gas Emissions, the project's significance is based on its potential to conflict with the applicable plans adopted for the purpose of reducing GHG emissions, including the City's CAP, the 2022 Scoping Plan, the 2017 Scoping Plan, AB 32 Regulations, SANDAG's RTP/SCS and the City's General Plan. As demonstrated in Section 5.7, the project would not conflict with applicable GHG reduction plans and regulations, accordingly, the impact would be less than significant.

Under the Exclusion of Planning Area B-2 Alternative, GHG emissions associated with construction, would be reduced, because no development would occur in Planning Area B-2. GHG emissions related to construction and operation would be reduced, because development would only occur in Planning Area B-1 and Planning Area A would remain in operation. Emissions from traffic trips would be reduced when compared to the proposed project due to the reduction in daily trips associated with Planning Area B-2; however, similar to the proposed project, implementation of this alternative would still introduce uses that would generate operational GHG emissions. In addition, although nothing would be built under this alternative in Planning Area B-2, development would likely occur at some point, consistent with the underlying land use and zoning. Therefore, compared to the proposed project, the Exclusion of Planning Area B-2 Alternative, would have reduced greenhouse gas impacts in the near-term and similar greenhouse gas impacts in the long-term. Impacts would not be substantially reduced.

Hazards and Hazardous Materials

As described in Section 5.8, Hazards and Hazardous Materials, construction and operation of the project is not anticipated to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. In addition, because soil contamination would be remediated to San Deigo RWQCB and San Diego Department of Environmental Health and Quality standards prior to project construction, minor grading and trenching would not encounter contaminated soil that could result in a significant hazard to on-site construction personnel or the environment. Further, with compliance with the Construction General Permit and MS4 Permit, project construction would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Lastly, the project would not result in potentially hazardous conditions to nearby schools; result in safety hazards or excessive noise for people working or residing near an airport; result in interference with an adopted emergency response or evacuation plan; or result in the exposure of people or structures to wildfires.

Under the Exclusion of Planning Area B-2 Alternative, development would occur in Planning Area B-1 and potential use or storage of hazardous materials during construction and operation would occur similar to the proposed project. However, with compliance with the Construction General Permit and MS4 Permit, construction of this

alternative would not create a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment, similar to the proposed project. This alternative would occur on the same project site, so the same less-than-significant impacts would result as it relates to soil remediation, proximity to a school, conflicts with an emergency response or evacuation plan, and risk of wildfires. Therefore, impacts would be similar under this alternative compared to the proposed project, regardless of the exclusion of development in Planning Area B-2.

Hydrology and Water Quality

As described in Section 5.9, Hydrology and Water Quality, through implementation of the requirements outlined in the CGP, construction-related impacts to surface water and groundwater would be minimized and impacts would be less than significant. With incorporation of water quality BMPs and project design features, the project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. The project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. The proposed storm drain system would be sufficient to satisfy Chula Vista criteria in the post-development condition (Appendix I1) and would not result in erosive scour and associated siltation of San Diego Bay. In addition, the project would not increase the rate of surface runoff; would not exceed the capacity of stormwater drainage systems; would not impede or redirect flood flows; is not located in a flood hazard, tsunami, or seiche zone; and would not interfere with implementation of water quality control plans or sustainable groundwater management plans.

Under the Exclusion of Planning Area B-2 Alternative, development would occur in Planning Areas B-1 and the existing industrial building would remain in operation in Planning Area A. New stormwater infrastructure would be installed and temporary water diversion and sediment capture devices would be used during construction. Similar to the proposed project, engineered stormwater infrastructure would be created to ensure runoff is not polluted and ensure runoff would not exceed the capacity of existing infrastructure. The storm drain system under this alternative would be required to satisfy Chula Vista criteria in the post-development condition and would not result in erosive scour and associated siltation of San Diego Bay. Potential impacts to hydrology and water quality would be similar when compared to the proposed project.

Land Use

As described in Section 5.10, Land Use and Planning, the proposed project would not result in a significant environmental impact due to division of an established community, a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant.

Under the Exclusion of Planning Area B-2 Alternative, development in Planning Areas B-1 would still occur in compliance with the Specific Plan (Appendix B); however, future development in Planning Area B-2 would not be required to adhere to the Specific Plan and would instead be subject to the existing regulations as outlined in the City's Municipal Code. Although future development in Planning Area B-2 would likely not conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, it may be less cohesive or compatible due to its nonconformance with the Specific Plan. Overall, land use impacts would be less than significant similar to the proposed project.

Noise

As described in Section 5.11, Noise, short-term construction noise is predicted to be well below the FTA guidance of 80 dBA L_{eq} over an 8-hour period, and therefore is less than significant. Traffic related to construction activities would not result in a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Potential impacts at existing off-site noise-sensitive land uses along roadway segments and project-generated changes to future traffic noise would be less than significant. Noise generated by Planning Areas A, B-1, and B-2 are expected to be below the City's 50 dBA L_{eq} nighttime threshold for multi-family residential land uses. Note that the multi-family residential land use threshold is applied to this analysis due to an absence of City thresholds for hotel land uses. Therefore, impacts associated with stationary operations noise would be less than significant. Lastly, because the predicted vibration level at 70 feet is less than this guidance limit of 0.2 to 0.3 ips PPV and because there are no residential structures adjacent to the project, the risk of vibration damage to nearby structures is considered less than significant.

Under the Exclusion of Planning Area B-2 Alternative, development would still occur in Planning Area B-1, and the existing industrial building would remain in operation in Planning Area A. There would be an increase in noise associated with construction and operation because new land uses would be built and in operation; however, excluding development in Planning Area B-2 altogether would result in reduced construction noise and vibration in the near-term. However, although nothing would be built under this alternative in Planning Area B-2, development would likely occur at some point, consistent with the underlying land use and zoning. Therefore, compared to the proposed project, the Exclusion of Planning Area B-2 Alternative, would have reduced noise impacts in the near-term and similar noise impacts in the long-term. Impacts would not be substantially reduced.

Population and Housing

As described in Section 5.12, Population and Housing, once operational, the estimated 1,000 jobs that would result from the proposed project would result in some amount of population growth within the City due to new employment opportunities; however, this population growth would not be considered unplanned because the proposed project would restore what was previously a major job center for the City of Chula Vista. No existing residential uses occupy the project site as the site was previously developed with industrial buildings, which have since been demolished. The proposed project does not include the construction of any residential units and would not displace existing housing or people or necessitate the construction of replacement housing elsewhere.

Similar to the proposed project, no housing would be developed under the Exclusion of Planning Area B-2 Alternative and no housing would be displaced. An increase in employment and/or restoration of previous employment opportunities would still be provided under this alternative due to the development in Planning Area B-1 and the continued use of Planning Area A. Impacts were determined to be less than significant under the proposed project, and impacts would be similar under the Exclusion of Planning Area B-2 Alternative.

Public Services

As described in Section 5.13, Public Services, the project would not substantially increase the demand of fire protection services requiring the construction of new or expanded fire protection facilities or facilitate the need for additional firefighters and equipment. The City's PFDIF would help cover the cost of new or expanding public facilities within the City, including fire and police facilities. The proposed project would be subject to payment of the PFDIF fees at the rate in effect at the time building permits are issued. Payment of the PFDIF would be necessary

to ensure that the project contributes its fair share of the cost of fire police facilities and equipment needed to adequately accommodate increasing demand within the City. In addition, the project site is located within existing CFDs for CVESD and SUHSD, which impose a special tax on property owners to finance both school districts. Any development of new school facilities resulting from these CFDs would be undertaken by the school district at that time. Pursuant to Education Code Section 17620(a)(1), the governing board can authorize the levy of a fee, charge, dedication, or other requirements against any construction within school district boundaries, and with the school district's collection of Statutory and Alternative fees developers can fully mitigate any impacts. Lastly, because the project is considered a commercial development, payment of PFDIF for libraries is not required.

Under the Exclusion of Planning Area B-2 Alternative development would still occur in Planning Area B-1 consistent with land use and zoning designations as outlined in the Specific Plan (Appendix B) and the industrial building in Planning Area A would remain in operation. Payment of the City's PFDIF would still be required under this alternative to help cover the cost of new or expanding public facilities within the City. However, a reduced amount of resources would be required to serve development under this alternative in the near-term when compared to the proposed project. Although nothing would be built under this alternative in Planning Area B-2, development would likely occur at some point, consistent with the underlying land use and zoning. Therefore, compared to the proposed project, the Exclusion of Planning Area B-2 Alternative, would have reduced impacts in the near-term and similar impacts in the long-term. Impacts would not be substantially reduced.

Recreation

As described in Section 5.14, Recreation, per CVMC Section 17.10.120, the proposed project would not be required to pay park development fees because there are no proposed residences within the project. Therefore, because the proposed project does not include a new residential population and would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Impacts would be less than significant.

Under the Exclusion of Planning Area B-2 Alternative development would still occur in Planning Area B-1 consistent with land use and zoning designations as outlined in the Specific Plan (Appendix B) and the industrial building in Planning Area A would remain in operation. Residential uses are not currently an allowed use under the existing zoning or General Plan land use, so similar to the proposed project, the Exclusion of Planning Area B-2 Alternative would not result in new population or residences, which would require additional recreational space or payment of fees. Therefore, development under this alternative would not be required to pay park development impact fees. Impacts would be similar to the proposed project.

Transportation

As described in Section 5.15, Transportation, the proposed project would not conflict with existing or proposed bicycle, pedestrian, or transit facilities in its vicinity. In addition, the proposed project (A, B1, and B2) is located in census tract 12600. The SANDAG average VMT per employee is 18.90 and the threshold of 85 percent would be 16.06 VMT per employee or below. The average VMT per employee of this tract is 15.91, which is below the regional average VMT per employee of 18.90 as well as below the VMT per employee threshold (i.e., 85 percent of the reginal mean) of 16.06. Therefore, it can be concluded that the proposed project is in a VMT efficient area for all employee uses. Because the proposed project would meet the VMT screening criteria described above, a more detailed VMT analysis is not required, and can be presumed to result in a less-than-significant VMT impact.

Under the Exclusion of Planning Area B-2 Alternative development would occur in Planning Area B-1 consistent with land use and zoning designations as outlined in the Specific Plan (Appendix B) and the industrial building in Planning Area A would remain in operation. By excluding development in Planning Area B-2 entirely, a reduction in approximately 5,000 average daily trips would occur, which would be a substantial reduction in cars to the surrounding roadway network. However, traffic impacts under CEQA are based on VMT and the average VMT per employee of this tract is 15.91, which is below the regional average VMT per employee of 18.90 as well as below the VMT per employee threshold (i.e., 85 percent of the reginal mean) of 16.06. Therefore, it can be concluded that similar to the proposed project, this alternative is in a VMT efficient area for all employee uses. Because this alternative would meet the VMT screening criteria, a more detailed VMT analysis would not be required, and can be presumed to result in a less-than-significant VMT impact. Thus, when compared to the proposed project, the Exclusion of Planning Area B-2 Alternative would result in the same VMT impacts.

As shown in the LMA, the project would be fully responsible for signalizing the Bay Boulevard and G Street and Project Driveway and H Street intersections and retiming the signals at the I-5 Northbound Ramps and E Street, Bay Boulevard and H Street, I-5 Northbound Ramps and H Street, and I-5 Northbound and Southbound Ramps and J Street intersections. The Project would contribute its fair share towards the construction of a traffic signal or roundabout at the Bay Boulevard and F Street. The Project would contribute its fair share towards the construction of a traffic signal at the J Street and L Street intersections with Bay Boulevard. All proposed improvements would achieve LOS D or better conditions during both peak periods except for the roundabout at Bay Boulevard and F Street. The improvements identified in the LMA are recommendations and the final improvement plan and project funding responsibility will be defined and documented in a separate Rohr/Wohl Specific Plan Transportation Conditions of Approval memo.

As it relates to the reduction in trips as a result of this alternative, it can be assumed that less improvements and fair share payments would be required. However, although nothing would be built under this alternative in Planning Area B-2, development would likely occur at some point, consistent with the underlying land use and zoning. Therefore, compared to the proposed project, the Exclusion of Planning Area B-2 Alternative, would have reduced traffic implications in the near-term and similar traffic implications in the long-term.

Utilities and Service Systems

As described in Section 5.16, Utilities and Service Systems, the proposed project would have adequate water, wastewater, stormwater, and telecommunication infrastructure. The project would be required to comply with all local and state regulations regarding solid waste and the surrounding landfills would have capacity to serve the project. Impacts would be less than significant.

The Exclusion of All Planning Area B-2 Alternative would develop Planning Area B-1 consistent with land use and zoning designations as outlined in the Specific Plan (Appendix B) and the industrial building in Planning Area A would remain in operation. Additional water supply would be needed, wastewater would be generated, and solid waste would be disposed of during construction or operation under this alternative. With no development occurring in Planning Area B-2, the demand on utilities would be reduced compared to the proposed project in the near-term. However, development in Planning Area B-2 would likely occur at some point, consistent with the underlying land use and zoning. Therefore, compared to the proposed project, the Exclusion of Planning Area B-2 Alternative, would have reduced impacts on utilities in the near-term, but similar operational impacts in the long-term.

10.5 Environmentally Superior Alternative

The No Project (No Build) Alternative is the environmentally superior alternative because it would involve no changes on the project site. The project site would remain in its current condition, effectively eliminating those project impacts discussed in this EIR. In accordance with CEQA, if the environmentally superior alternative is the No Project (No Build) Alternative, the EIR must also identify an environmentally superior alternative among the other alternatives (Section 15126[e][2]). Table 10-1 provides a summary comparison of the significant impacts attributable to each of the alternatives relative to the proposed project.

As demonstrated in Table 10-1, the next environmentally superior alternative would be the Exclusion of Hotel in Planning Area B-2 Alternative. Under this alternative development would still occur in Planning Area B-1 and the existing industrial building in Planning Area A would remain in operation; however, instead of a hotel being built in Planning Area B-2, a less intensive land use would be built instead. Implementation of this alternative would still introduce uses that would generate operational air pollutant emissions and greenhouse gas emissions, but not to the same extent that a hotel would. Compared to the proposed project, the Exclusion of Hotel in Planning Area B-2 Alternative, would have reduced impacts, because a hotel would not be built and a less intensive development, consistent with the Specific Plan, would be built instead. In addition, exclusion of a hotel in Planning Area B-2 would, because of the unique operational characteristics of a hotel, substantially reduce operational impacts associated traffic, and utilities (water supply, wastewater service, and solid waste generation). This alternative would still meet all of the project's objectives. For these reasons, the Exclusion of Hotel in Planning Area B-2 is considered the environmentally superior alternative.

Table 10-1. Alternatives Impact Summary

Environmental Issue	Proposed Project Impacts	No Project/no Build Alternative	Build to Existing Land Use Designations Alternative	Exclusion of Hotel in Planning Area B-2 Alternative	Exclusion of Planning Area B-2 Alternative
Aesthetics	LTS	▲	–	–	▲
Air Quality	LTS with MM	▼	–	▼	–
Biological Resources	LTS with MM	▼	–	–	–
Cultural and Tribal Cultural Resources	LTS with MM	▼	–	–	–
Energy	LTS	▼	–	–	–
Geology and Soils	LTS with MM	▼	–	–	–
Greenhouse Gas Emissions	LTS	▼	–	▼	–
Hazards and Hazardous Materials	LTS	▼	–	–	–
Hydrology and Water Quality	LTS	▼	–	–	–
Land Use and Planning	LTS	▲	–	–	–
Noise	LTS	▼	–	–	–
Population and Housing	LTS	▼	–	–	–
Public Services	LTS	▼	–	–	–
Recreation	LTS	–	–	–	–
Transportation	LTS	▼	–	▼	▼ Slightly
Utilities and Service Systems	LTS	▼	–	▼	▼ Slightly
Meets Most Project Objectives	*Yes*	*No*	*No*	*Yes*	*Yes*

▲ Alternative is likely to result in greater impacts to issue when compared to proposed project.
– Alternative is likely to result in similar impacts to issue when compared to proposed project.
▼ Alternative is likely to result in reduced impacts to issue when compared to proposed project.

LTS = Less than significant impact.
PS = Potentially significant impact.
SU = Significant and unavoidable impact.

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Chapter 10 Alternatives

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