

**ADDENDUM TO
SECOND-TIER FINAL
ENVIRONMENTAL IMPACT REPORT EIR 07-01**

PROJECT NAME: Eastern Urban Center Sectional Planning Area (SPA) Plan and Form Based Code Amendment

PROJECT LOCATION: Properties within the Eastern Urban Center (EUC) bounded by Birth Road on the north, Eastlake Parkway on the east, Hunte Parkway on the south and SR 125 on the west.

PROJECT APPLICANT: SLF 1V/Mcmillin Millenia JV, LLC

CASE NO: IS-15-0003

DATE: July 6, 2016

I. BACKGROUND/SCOPE OF ANALYSIS

The purpose of this Addendum is to address the proposed project, which includes an amendment to the EUC Sectional Planning Area (SPA) Plan and Form Based Code (FBC) to relocate the primary school site designation to District 5 of the Project.

As the lead agency for the project under the California Environmental Quality Act (CEQA, Public Resources Code, Sec. 21000 et seq.), the City of Chula Vista prepared and conducted an environmental analysis (Second-Tier Environmental Impact Report (EIR-07-01)). The Final Second Tier Environmental Impact Report (EIR 07-01) for the Otay Ranch EUC SPA Plan, Tentative Map and related items was certified on September 15, 2009. The EIR addressed the development of the 207 acres of the Otay Ranch.

There are no new environmental impacts not examined in the certified Program EIR prepared for the Otay Ranch General Development Plan (EIR 90-01) and the General Plan Update EIR (EIR-05-01) except as described in the Second-Tier Final EIR 07-01.

The proposed amendment to the EUC SPA Plan and FBC are based on requested changes to: 1) allow for the primary elementary school site designation to be removed from District 9 and added to District 5; 2) deletion of a segment of Montage Avenue and clarify the approval authority for future street deletions; and 3) establish revised parking rates for Millenia and clarify the approval authority for the projects' parking management plan.

Mitigation measures from the Mitigation Monitoring and Reporting Program (MMRPs) associated with FEIR 07-01 are still valid and applicable to this project. The physical development of the 207 acres has been previously addressed in the certified EIR. Thus, this Addendum focuses on the proposed EUC SPA and FBC amendment.

Because the modifications to the SPA plan, and associated FBC would not result in any increase in allowable units nor an expansion of the limits of grading, the proposed SPA and FBC amendment is considered to be adequately covered under FEIR 07-01 and no further analysis is warranted.

II. PROPOSED AMENDMENTS

The purpose of this Addendum is to address the proposed project, which includes the following elements:

1. An amendment to the EUC Sectional Planning Area (SPA) Plan and Form Based Code (FBC) to relocate the Millenia primary school site from the South Central Neighborhood District (District 9) to the Civic District (District 5).
2. An amendment to delete segment of Montage Avenue between Strata Street and Avant Street and amend Section 04.06.000 of the EUC Form Based Code to give the Director of Development Services and City Engineer the authority to approve street deletions.
3. An amendment to establish revised parking rates and amend Section 03.15.000 of the EUC Form Based Code to clarify that the Director of Development Services has the authority to approve the Millenia Parking Management Plan as well as minor text revisions to reflect the new parking rates.

III. CEQA REQUIREMENTS

Sections 15162 through 15164 of the State CEQA Guidelines discuss a lead agency's responsibilities in handling new information that was not included in a project's certified environmental document. Section 15162 of the State CEQA Guidelines provides:

- (a) When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:
 - (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
 - (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

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

Section 15164 of the State CEQA Guidelines provides that:

- A. The lead agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.
- B. An addendum need not be circulated for public review but can be included in or attached to the final EIR.
- C. The decision-making body shall consider the addendum with the final EIR prior to making a decision on the project.
- D. A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's required findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

This Addendum has been prepared pursuant to the requirements of Sections 15162 and 15164 of the State CEQA Guidelines. The proposed changes to the project do not constitute a substantial change to the previously approved project. The modifications proposed would not result in any environmental effects that were not considered in the

Second-Tier Final EIR 07-01, nor would the changes increase the severity of any of the impacts identified in this EIR. There has been no significant material change in circumstances relative to the project, and no new information of substantial importance has become available after the preparation of the EUC EIR. The mitigation measures identified in Second-Tier Final EIR 07-01 would be equally applicable to the revised project. Therefore, in accordance with Sections 15162 and 15164 of the State CEQA Guidelines, the City has prepared this addendum to Second Tier FEIR 07-01.

IV. ANALYSIS

No new significant impacts were identified beyond those identified in Second-Tier Final EIR 07-01. Therefore, no new additional mitigation measures or modifications to existing mitigation measures are required.

Circulation

The EIR for the original EUC SPA Plan approved in 2009 analyzed two potential school sites, a preferred site on Lot 26 (within District 9) and an alternative site on Lot 27 (District 10). In 2012, the Chula Vista Elementary School District (school district) formally approved the school location within District 9. Because it was determined at that time that the alternative school site in District 10 was no longer needed, the site designation was removed from District 10 (as part of a 2013 SPA amendment) and no alternative location was provided at that time. Thus, even though the EIR had assumed both a primary and alternative school site, all that remained (after the 2013 SPA amendment) was the primary site. The School District has now requested that the primary school site in District 9 be removed, and a primary school site designation be placed on the 8.5 acre site (Lot 16) within the southern portion of District 5.

The new primary school location on Lot 16 within District 5 will be bound on three sides by access roads, including Millenia Avenue to the west, Montage Avenue to the east and Strata Street to the south. The site is bordered on the north by the future Civic Park and the planned City Library site on Lot 7. While no site plan has been provided to indicate the layout of the primary school site, with streets at pad level on three sides, there is the potential to provide for improved access and circulation patterns in and around the elementary school. Signalized access to the school site will be provided via a planned traffic signal on Millenia Avenue.

The City's traffic engineer has reviewed the previous traffic studies prepared for the EUC and concluded that traffic impacts of providing a primary school site in District 5 would be minimal to none. While there may be temporary heavy traffic during morning and afternoon peak hours, there will be enough capacity for the roadways and intersections to handle these temporary peaks. Further, because the Millenia community is laid out in a grid pattern of smaller unclassified streets, the City's traffic engineer does not believe Millenia Avenue will move to a substandard service threshold as a result of the alternative school site location.

In regard to Street Deletion Approval Authority, the Millenia Form Based Code (FBC) includes specific Subdivision Standards and Procedures (Section 04.06.000) that allow new streets to be added by Final Map with the approval of the Director of Development Services and the City Engineer, regardless of whether those streets were shown on the original Tentative Map. The intent of the proposed amendment is to add clarifying language to allow streets to also be deleted with approval of a Final Map with the Director of Development Services and the City Engineer's approval.

Montage Avenue segment deletion - In 2014, the City Council approved the SPA plan and related entitlements for the Otay Land Company's Village Nine project. Those entitlements eliminated the extension of what is Montage Avenue in Millenia, south across the Otay Land Company property to Main Street (previously known as Hunte Parkway). This action had the impact of rendering a segment of Montage Avenue (between Strata Street and Avant Street) on the Millenia site unnecessary. A technical study dated August 13, 2013 was prepared by Darnell and Associates, Inc. and accepted by the City showing that the deletion of the street segment would not adversely impact either the circulation or levels of service (LOS) in the project. In fact, the study concluded that several of the Millenia intersections operated better with this street segment removed. That study was reviewed and approved by the City.

The deletion of the segment of Montage Avenue south of Strata Street, which would be deleted by the Director of Development Services if the proposed amendment is approved, will not impact pedestrian or other alternative modes of circulation, as sufficient sidewalks and bike accessibility is provided to the lots adjacent to the deleted street segments via Millenia Avenue, Orion Avenue and Strata Street. The removal of this segment will also not impact any planned transit routes or facilities.

In terms of Parking Management Plan, this component of the proposed SPA amendment is intended to clarify the approval authority for the Millenia Parking Management Plan (PMP) and well as to establish initial parking rates to replace those currently shown in Table III of the EUC FBC (Said rates will subsequently be established as Appendix B to the subsequently adopted PMP). The Millenia PMP plan is contemplated by and required by the Millenia SPA Plan (Section 03.15.00) to manage the parking supply in the commercial areas of the project. The SPA plan provisions are very specific as to the elements of the PMP, the scope of what is to be included in the plan, and what the respective roles and responsibilities are for the various parties. There are no environmental impacts associated with this portion of the SPA amendment as it is procedural only.

Land Use

The EIR for the original EUC SPA Plan approved in 2009 analyzed two potential school sites, the preferred site on Lot 26 (within District 9) and an alternative site on Lot 27 (District 10). In 2012, the Chula Vista Elementary School District (School District) formally approved the location within District 9. Because it was determined at that time that the alternative school site in District 10 was no longer needed, the site designation

was removed from District 10 (as part of a 2013 SPA amendment) and no alternative location was provided at that time. Thus, even though the EIR had assumed both a primary and alternative school site, all that remained (following the 2013 SPA amendment) was the primary school site.

Subsequently, the school district has been considering a joint use elementary school and YMCA facility or other similar compatible non-profit use. Due to the requirement for additional acreage to provide for a joint facility, the school district found the available acreage in District 9 (the existing primary school site location) would not be sufficient. As a result, the school district has now formally selected a site in District 5 as their desired school site for Millenia. The applicant has requested that the FBC be amended to reflect this desired change in the designated location for the primary school site. The 8.5 acre parcel within District 5 is located in the southern portion of this District and is of sufficient size that it could accommodate such a joint use facility. This District already contains a requirement for a CPF site to be developed within it.

While not within a residential district, the new location of the primary school site in SPA Lot 16 within District 5 is both immediately adjacent to other residential districts and is centrally located overall within Millenia. District 5 functions as the focus of community, government, and cultural activities and will provide a major office campus, a CPF site, a Fire Station, a 1.62-acre public park and multi-purpose venues. The relocated primary school site is in proximity to a future City Library site. The site is adjacent to future public park with access to the Regional Trail and an extensive sidewalk and bicycle network.

CONCLUSION

Pursuant to Section 15162 and 15164 of the State CEQA Guidelines, and based upon the above discussion and substantial evidence in the record supporting said discussion, I hereby find that the proposed project will result in only minor technical changes or additions which are necessary to make the Environmental Impact Reports adequate under CEQA.


Jeff Steichen
Associate Planner

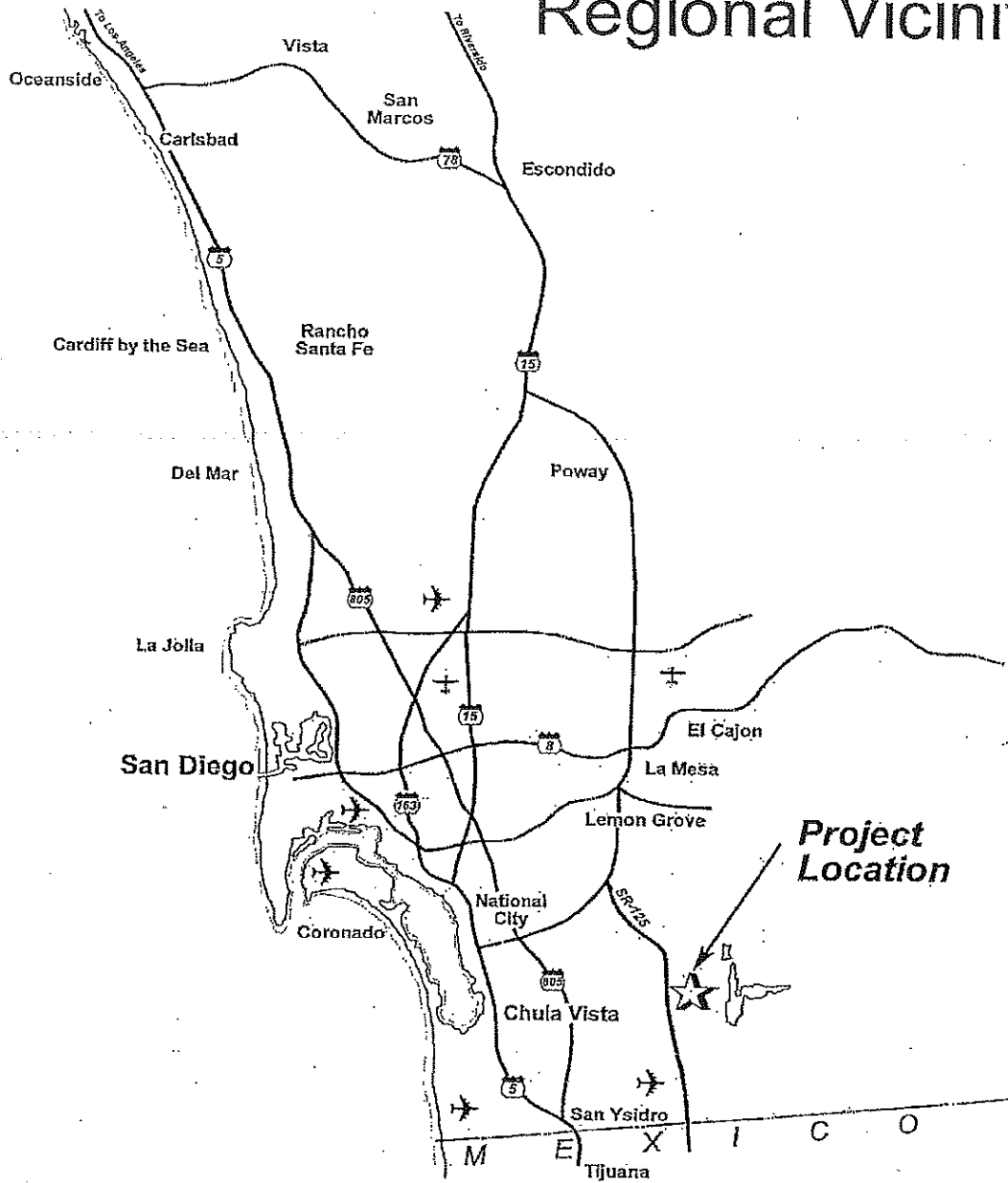
Attachments:

1. Project Site Plan(s)
2. Executive Summary to EIR 07-01

References:

City of Chula Vista Environmental Review Procedures
City of Chula Vista General Plan Update
Second Tier EIR #07-01

Regional Vicinity



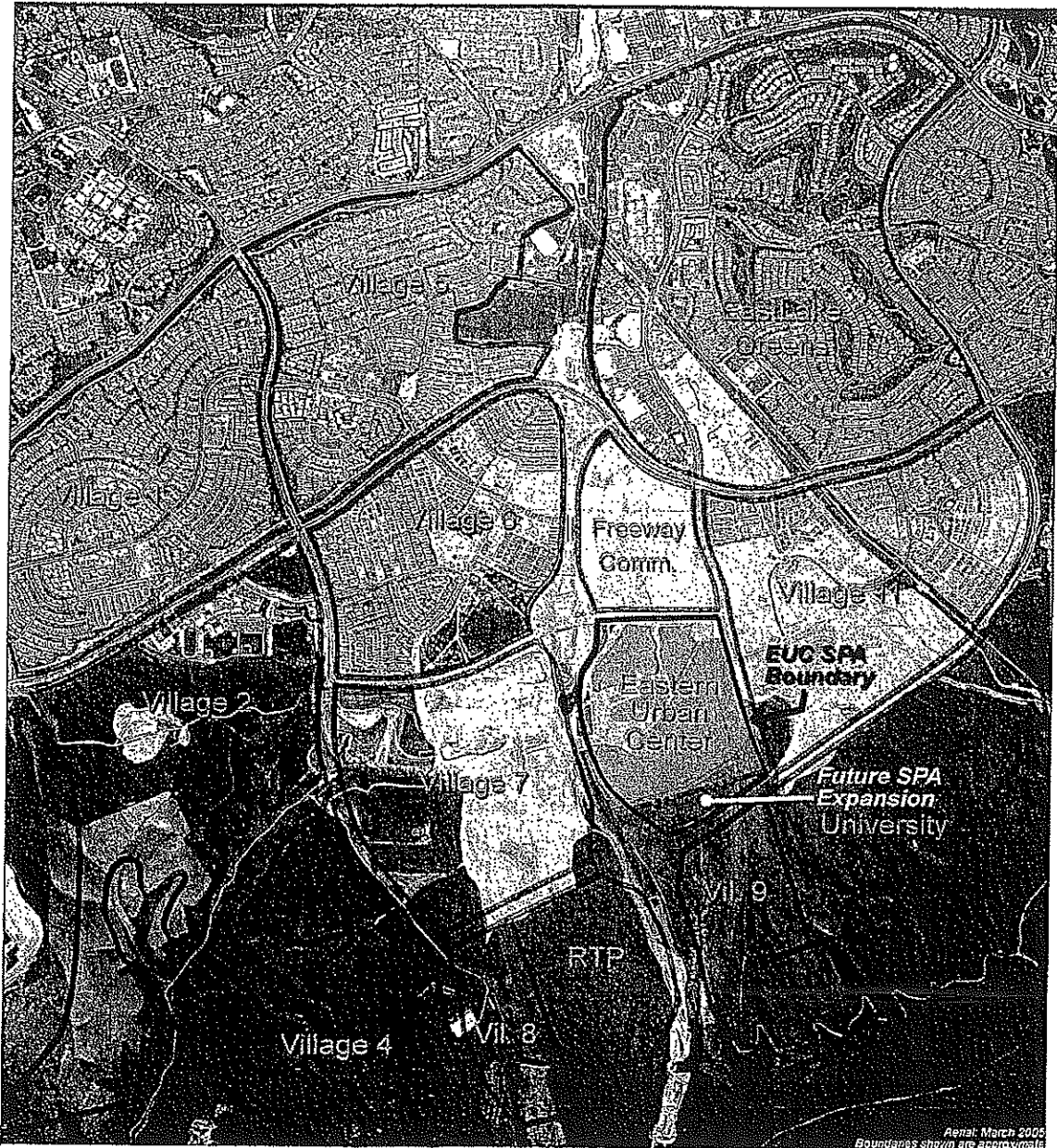
Eastern Urban Center OTAY RANCH



Exhibit I-1

(10/6/09)

Location/SPA Boundary



Eastern Urban Center
OTAY RANCH



Exhibit I-2

EXECUTIVE SUMMARY

This Environmental Impact Report (EIR) is an informational document intended for use by the City of Chula Vista, other public agencies, and members of the general public in evaluating the potential environmental effects of the proposed Eastern Urban Center (EUC) Sectional Planning Area (SPA) Plan located in the Otay Ranch subregion of the City. The proposed SPA Plan is a document that refines and implements the land use plans, goals, and objectives of the Otay Ranch General Development Plan (GDP) for the development of the EUC

CEQA Statute Section 21002 requires that an EIR identify the significant effects of a project on the environment and provide measures or alternatives that can mitigate or avoid these effects. This Draft EIR evaluates the environmental effects associated with development of the proposed EUC SPA Plan and discusses the manner in which the SPA Plan's significant effects can be reduced or avoided through the implementation of mitigation measures or feasible alternatives to the proposed project. In accordance with Section 15130 of the CEQA Guidelines, this EIR also includes an examination of the effects of cumulative development.

The Otay Ranch GDP Program Final EIR (EIR 90-01, SCH #89010154) is incorporated by reference in accordance with CEQA Guidelines Section 15168(d). This Draft EIR addresses environmental issues associated with the EUC that were not evaluated at a project level in the Otay Ranch GDP Program Final EIR and updates information in the Otay Ranch GDP EIR pertaining to the EUC SPA Plan area.

This summary provides a brief synopsis of the project description, project alternatives, and the results of the environmental analysis presented in this EIR document.

1. PROJECT LOCATION AND SETTING

The Otay Ranch GDP planning area lies within the East Planning Area of the City of Chula Vista. The EUC is located in the northeastern portion of the approximate 9,500-acre Otay Valley Parcel of the Otay Ranch GDP project area. Telegraph Canyon Road and the EastLake Community bound the Otay Valley parcel on the north; Lower Otay Lake and the Arco Olympic Training Center from the eastern limits; the Otay River Valley encompasses the southern limits; and other recent development, including Sunbow I and II, the Otay Landfill, and the Coors Amphitheater and Water Park, comprise the western limits. The EUC is an approximately 237-acre parcel located at the east side of State Route 125 (SR-125) between Birch Road and Hunte Parkway. The proposed EUC SPA Plan site comprises approximately 207 acres, or approximately 90 percent, of the total EUC land area.

The EUC parcel consists of fairly flat mesa tops and gently rolling hills within the high point of the Otay Ranch, with elevations ranging from approximately 520 feet above mean seal level (MSL) in the southeast corner of the site to a high of approximately 640 feet above MSL in the center of the property. The EUC area has historically been used for grazing and agriculture and no development presently occurs on the site. The project site is surrounded by existing Otay Ranch development, including the Otay Ranch Town Center (Planning Area Twelve) to the north, north of Birch Road; Village Seven to the west, west of SR-125; and Village Eleven to the east; east of EastLake Parkway.

2. PROJECT BACKGROUND

The proposed EUC SPA Plan is part of the designated EUC planning area within the Otay Ranch GDP. The Otay Ranch GDP was adopted by both the Chula Vista City Council and the San Diego County Board of Supervisors in October 1993. Both agencies were involved in the development and approval of the plan because the planning area included land falling within the jurisdiction of both agencies. The GDP was amended in December 2005. The GDP establishes land plans, design guidelines, objectives, policies, and implementation measures that apply to all portions of Otay Ranch while supporting a balance of housing, shops, workplaces, schools, parks, civic facilities, and open spaces on a total of approximately 23,976.5 acres. The majority of development is intended to be clustered in villages, with conveniently located features and well-defined edges such as the Chula Vista greenbelt, open spaces, and wildlife corridors.

Under the implementation program for the Otay Ranch GDP, review and City Council approval of SPA plans is required before final development entitlements can be considered. The GDP defines the EUC as a regional center that would contain the most intense development in Otay Ranch and would serve as the urban heart of the region. Uses and intensities are intended to create a lively 24-hour environment, with a creative combination of uses, building types and amenities. These uses include regional retail commercial, hotel, office uses, and medium to high density residential uses. Retail and office development within the EUC would be of an intensity compatible with a "downtown" urban center. The most intense development is concentrated near the transit station, with building heights and sizes gradually decreasing near the edge of the planning area.

3. PROJECT DESCRIPTION

The proposed project consists of four components, including (1) the EUC SPA Plan, (2) the off-site Soils Stockpiling Area (SSA); (3) off-site Salt Creek Sewer Lateral Improvement Area (SCSL); and (4) the off-site Poggi Canyon Sewer Improvement Area (PCSI).

A. EUC SPA Plan

The proposed SPA Plan is comprised of the following land uses: a maximum of 2,983 multi-family residential units; a maximum of 3.487 million square feet of non-residential floor area; approximately 16 acres of urban parks; a potential approximately 5.5-acre elementary school site; an approximately one-acre fire station site; and approximately 30 acres of street right-of-way. Development would occur in ten specific districts, including five residential neighborhood districts, two gateway districts, a business district, a mixed-use civic/office core district, and a main street district. Although the orientation of specific districts may be more residential or non-residential in character, mixed use would be permitted within all districts. The EUC SPA Plan establishes density/intensity ranges for each district, although density/intensity may be transferred between districts.

The SPA Plan would feature an internal grid street system, with a primary (4-lane major) north-south street providing uninterrupted access between Birch Road and Hunte Parkway. The SPA Plan would provide two access points on Birch Road, three access points on EastLake Parkway, and two access points on Hunte Parkway. A greenway trail linking with the City's Greenway Trail system would enter the EUC via Bob Pletcher Way on the west and exit the EUC via a pedestrian bridge across EastLake Parkway on the east. The EUC would provide a transit station and guideways for Bus Rapid Transit (BRT) and Chula Vista Transit (CVT). Transit stops would be located within ¼ mile of the majority of uses in the EUC.

Site preparation and grading for the EUC would occur under one of two options: Grading Option 1 and Grading Option 2. The estimated earthwork quantity under Grading Option 1 would be approximately 3.6 million cubic yards of cut and fill. Earthwork would be balanced between the EUC and off-site locations, with 2.5 million cubic yards of fill to remain in the EUC and 1.1 million cubic yards to be exported off-site to an approximately 30.3-acre parcel to the south in the designated Village Nine. Grading Option 2 recognizes that adjacent property owners may not consent to off-site grading and balances quantities within the project site and a portion of the remainder of the EUC, including the Hunte Parkway right-of-way. Under this option, the estimated earthwork quantity under Option 2 would comprise 3.2 million cubic yards of cut and fill. Under this option, the grading necessary for the construction of the off-site portions of Streets A, B, C and M, and Hunte Parkway is evaluated.

Development of the EUC SPA Plan would occur non-sequentially to allow flexibility based on market changes or regulatory constraints and public infrastructure needs/requirements. It is assumed that construction could begin in late 2009 with buildout of all residential units within the EUC SPA Plan area by Year 2020, along with approximately two million square feet of non-residential uses. The remainder of the project is estimated to be built out by Year 2030.

The proposed EUC SPA Plan is consistent with the maximum residential development and non-residential floor area set forth in the Otay Ranch GDP and no amendments of the General Plan or GDP are required.

B. Off-site Soils Stockpiling Area (SSA)

Under Grading Option 1, the approximately 59-acre off-site SSA to the south would be affected. Therefore, stockpiling on the SSA is evaluated in the EIR as a potential component of the proposed project. Stockpiling activities include grading and compaction of fill soils. Grading would be completed in one or two phases. Under the single phase, stockpiling and grading would be completed in approximately 12-18 months and under the two-phase, the first phase would be completed in 9 months and second phase would be completed in 12 months.

C. Off-site Salt Creek Sewer Lateral Improvement Area (SCSL)

The SCSL would involve the addition of a 173-foot, 15-inch diameter sewer line to the Salt Creek trunk sewer within an approximate 1.44-acre area. The proposed sewer pipeline would be installed using a combination of conventional open trench excavation and boring and jacking. The SCSL will also include modification of an upstream manhole. This project would be short-term in nature.

D. Off-site Poggi Canyon Sewer Improvement Area (PCSI)

The PCSI involves the replacement of a section of 18-inch line with a section of 21-inch line within the Olympic Parkway and Brandywine Avenue intersection. The PCSI project would require an approximately 8-foot-wide, 14-foot-deep excavation trench. This project would be short-term in nature.

E. Discretionary Actions

A discretionary action is an action taken by an agency that calls for the exercise of judgment in deciding whether to approve or how to carry out a project. The following discretionary actions are associated with the proposed EUC project and would be considered by the Chula Vista Planning Commission and City Council:

(1) Adoption of the SPA plan and associated documents including, but not limited to:

- SPA Plan,
- Form Based Code (Planned Community District Regulations & Village Design Plan),
- Public Facilities Financing Plan/Fiscal Impact Analysis,
- Air Quality Improvement Plan,
- Water Conservation Plan,
- Non-renewable Energy Conservation Plan,

- Affordable Housing Plan, and
 - Urban Parks, Recreation, Open Space & Trails Plan.
- (2) Approval of Tentative Subdivision Map to establish the layout of land uses, developable and open space lots, and infrastructure requirements for the EUC;
- (3) Certification of a Final EIR and adoption of a Mitigation Monitoring and Reporting Program pursuant to the California Environmental Quality Act (CEQA).

Potential future discretionary actions may include approval and adoption for a Parks Agreement and a Development Agreement. If it is determined that either of the agreements deviates from the impacts analyzed in this EIR, additional environmental review will be conducted prior to approval of the Agreement, in accordance with CEQA.

In addition, this EIR may be used by other responsible agencies to implement the proposed project, including the Regional Water Quality Control Board.

4. ENVIRONMENTAL ANALYSIS

Table ES-1, *Summary of Environmental Impacts and Mitigation Measures*, on page ES-8 summarizes the project's impacts according to established thresholds under each environmental issue, proposed mitigation measures, and potential significant and unavoidable impacts after the implementation of all feasible mitigation measures as analyzed in detail in Section 4.0 of this EIR.

5. PROJECT ALTERNATIVES

Three project alternatives have been evaluated in the Draft EIR. These include: (1) the "No Project" Alternative;" (2) the "Reduced Density Alternative;" and (3) the "Adjusted Land Use Mix" Alternative. The No Project Alternative assumes that no SPA Plan would be developed within the EUC, and the existing land uses within the project site would remain unchanged. Accordingly, this alternative would be equivalent to the conditions discussed under existing conditions for each category analyzed in this Draft EIR. The project site would remain in agricultural use or remain fallow. Since no development would occur, environmental impacts associated with construction and development would be avoided. The No Project Alternative would avoid the proposed EUC SPA Plan's significant and unavoidable impacts associated with the permanent change in visual character of the project site from open space to dense urban development; construction and operation air emissions; cumulative traffic impacts on three segments of the I-805 freeway; and permanent loss of Farmland of Local Importance. However this alternative would be less beneficial than the project in meeting the General Plan and GDP objectives that call for the Eastern Urban Center to function as the high-density, mixed use downtown and regional heart of the Otay Ranch Subarea and East Planning Area.

In addition, the No Project would be less beneficial in that it would not provide a link in the City's Greenway Trail; it would not remediate existing stockpiled soils that have the potential to impact downstream habitat; it would not remediate soils containing OPCs associated with the former use of pesticides in the project site; and it would not provide affordable housing, as would the proposed project. The No Project Alternative would not achieve any of the project objectives and would be inconsistent with the General Plan and GDP. As school, fire, and library sites would not be provided this alternative would result in a significant impact on these region-serving public services.

The Reduced Density Alternative ("Alternative 2") would reduce overall development by 25 percent, resulting in a total 2,237 residential units and 2.62 million square feet of non-residential floor area. This alternative assumes that the project's library and fire station would be respectively reduced commensurate with reduced demand. The Greenway Trail would be developed as under the proposed EUC SPA Plan. In addition, a 5- to 6-acre school site would be provided as under the proposed project. However, parkland and in lieu fees would be proportionately reduced by 25 percent for a total of 11.72 acres of parkland and in lieu fees equivalent to 5.8 acres, for a total equivalent to 17.5 acres. Alternative 2 would meet the basic objectives of the projects, but assumes that the EUC would have an overall lower building profile than anticipated under the Otay Ranch GDP. In contrast to the proposed project, this alternative would be inconsistent with the General Plan and GDP and would, therefore, require a General Plan Amendment and GDP Amendment. Alternative 2 would reduce impacts that are population based and, therefore, would have incrementally less impact on services and utilities. Due to reduction in daily and peak hour traffic, this alternative would incrementally reduce impacts associated with mobile air quality, mobile noise, and traffic, including four previously significantly impacted intersections prior to mitigation. However, this alternative would not reduce the project's significant and unavoidable impacts associated with the permanent change from open space to dense urban development, construction and operation air emissions, cumulative traffic on three segments of I-805, and the permanent loss of Farmland of Local Importance.

The Adjusted Land Use Mix Alternative ("Alternative 3") would change the project's mix of land uses, including a 62.5 percent increase in residential units and a 53.5 percent decrease in total non-residential floor area. Alternative 3 would provide 1.62 million square feet of non-residential uses (including an elementary school) and 4,850 residential units. Other changes from the EUC SPA Plan would be a 40 percent reduction in hotel rooms, and an increase in parkland (20.37 acres of parkland and seven parks, compared to the proposed project which would provide 15.63 acres of parkland and six parks). Although Alternative 3 would provide 30 percent more parkland than the proposed project, as residential uses would increase 62.5 percent, parkland obligation would respectively increase. High Rise Commercial/Office floor area and civic/public facilities would be the same as under the proposed project and the reduction in non-residential floor area would be primarily made with respect to regional and local retail uses. Alternative 3 would generate 52,097 fewer trips than the proposed project. There would be a corresponding reduction in A.M. and P.M. peak hour trips. As with the proposed project, all impacts to the study area intersections and roadway segments would be

reduced to less than significant. Significant and unavoidable impacts along three segments of the I-805 freeway would not be avoided with the alternative.

Alternative 3 would not implement the GDP in providing a mixed-use environment in which residential uses are intermixed with a strong retail component to the same extent as the EUC SPA Plan. In addition, it would exceed the GDP and General Plan estimated residential units for the EUC by 62.5 percent. The 53.5 percent reduction in non-residential floor area would be less in keeping with the objective to establish a flexible and responsive land use and facility plan which assures project viability in existing and future economic cycles, since Alternative 3 is predominantly residential. Due to the change in the balance of residential and non-residential uses, Alternative 3 would not implement the goals, objectives, and policies of the Chula Vista General Plan and the Otay Ranch GDP to achieve a mixed-use urban place that sets itself apart from surrounding suburban villages to the same extent as the proposed project. Amendments to the General Plan and GDP would be required to implement this alternative. Alternative 3 would have the same significant and unavoidable impact as the project regarding the change in the open space character of the project site to dense urban use and would not avoid the project's significant and unavoidable impact construction and operation air emissions; permanent loss of Farmland of Local Importance; and cumulatively significant and unavoidable impacts on three segments of the I-805 freeway. In addition, unlike the proposed project, Alternative 3 would have a significant and unavoidable impact on schools. Alternative 3 would have an incrementally greater impact on geology, fire, police, library, water, wastewater, solid waste, and population.

The No Project Alternative would be the environmentally superior alternative, as it would entirely avoid the proposed project's significant and unavoidable reduction of open space, air quality, loss of agricultural lands, and cumulative impacts on the I-805. However, as the No Project Alternative is determined to be environmentally superior, an environmentally superior alternative must also be identified among the remaining alternatives. Thus, Alternative 2 is identified as the environmentally superior alternative as it would incrementally reduce traffic; mobile and stationary operational air emissions; operational noise; biological resources, water quality, exposure to geologic hazard; demand for fire and emergency services, police services, schools, libraries, water supply, wastewater, solid waste services; and impacts affecting global climate change. However, as with Alternative 3, this alternative would not eliminate any of the project's significant and unavoidable impacts associated with the change in the open space character of the project site; construction and operation emissions, and loss of Farmland of Local Importance.