

# Comments on Urban Core Specific Plan

Public Review Draft April 2006

submitted jointly by

**CROSSROADS II Corp.**     *Northwest Civic Association*

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## **Chapter II. Introduction & Background**

**p. 2: Consistency with the General Plan.** Page 14 of this chapter contains the following sentence: *The Specific Plan has been prepared to reinforce all elements of the General Plan relative to the Urban Core.* But the Specific Plan ignores Theme 8 of the General Plan, “Shaping the Future Through the Present and Past.” This theme requires that

*New development and other physical alterations in Chula Vista continue to be done in a manner that respects the character, scale, and historical value of the City. This approach limits discord with the physical and social climate of the City, harmonizing changes to blend in with and enhance the positive aspects of what is already there.*

The vision for the urban core will evolve over many decades, one project at a time, in scattered locations. Given this, the concept that new development should harmonize with the existing small-town feel of northwest Chula Vista is essential to preserving the character of the area and maintaining a seamless transition between old and new. This is a paramount issue to CII and the *NWCA*. This section should be revised to include a thorough discussion of Theme 8 of the General Plan.

Also, why does the Projected Buildout table on this page call for a net increase of 7,100 dwelling units, when Appendix C concludes “..the Urban Core might accommodate over 1,500 to over 3,600 new housing units between 2000 and 2030...” (p. 13)?

### **p. 14: Chula Vista Municipal Code – Title 19 Zoning**

This section neglects to even mention the Cummings Initiative. This is a major oversight that must be corrected. During discussion of the General Plan, we repeatedly raised the Cummings Initiative. We were told that since that initiative deals with zoning, it would be dealt with in the UCSP. Now is the time to inform the public and potential developers of the city’s views on the implications of the Cummings Initiative on the UCSP.

### **Chapter III. Vision for the Urban Core**

**p. 2:** Add a bullet that says something like

- *A harmonious blend of old and new, where new development takes its design cues from the existing culture, character, and history of northwest Chula Vista.*

### **Chapter IV. Existing Conditions**

**p. 5: Historic Sites in the Study Area.** This section is completely inadequate. Further, it is not even consistent with the report in the Draft EIR, which in itself is inadequate. Many sites of historic or architectural importance are missing. Two obvious examples are the Vogue Theatre and the El Primero Hotel. Another example is the landscaped median on Third Ave. between F St. and Madronna. The section needs substantial revision.

**p. 10: How Historic Information Will Be Used.** This section says “Land use and development recommendations within the plan area will use and refer to the historic resources inventory.” But the Land Use and Development Regulations (Chapter VI) do NOT refer to even the limited number of historic sites listed. This section should be amended to include

- A much more thorough historic resources inventory.
- Specific regulations applicable to new development adjacent to an historic site should be included in Chapter VI. We recommend that any new project adjacent to a designated historic site be required to obtain a “Certificate of Appropriateness” from a design review board.

**p. 15:** Paragraph on the Broadway corridor should describe Broadway’s existing status and future potential as a restaurant row. This issue was raised in the last Advisory Committee meeting, and was supported by the mayor in his remarks at that meeting.

**p.20:** “SWOT” Analysis. Need explanation of “SWOT.”

Finally, this chapter should acknowledge that virtually all of the acreage covered by the UCSP is developed, and that implementation of the UCSP will require demolition and displacement of residents from their current homes.

### **Chapter V. Mobility**

**p. 2: Traffic Calming Design Elements.** Add a map showing at which intersections refuge islands and bulb outs should be provided.

**p.10: Route 627 (H street BRT).** It is time to end the fiction that H St. will have BRT service during the lifetime of this plan. The best “transit” that can be achieved is

express bus service. This is corroborated in a letter from SANDAG in response to the General Plan EIR. The document text should be revised accordingly.

## **Chapter VI. Land Use and Development Regulations**

Because this is the only chapter that is regulatory, we reviewed it closely, especially the “zoning sheets” for the sub-districts. Specific comments on each sub-district’s zoning are attached. In addition, the following comments apply to ALL of the zoning sheets:

- 1) See comments under Chapter II regarding the Cummings Initiative.
- 2) We believe the minimum parking standards are too low. Although the consultant spoke disparagingly at the last Advisory Committee meeting about “suburban parking standards,” the document contains no evidence that urban dwellers have any fewer vehicles than suburban dwellers. To avoid impacting neighboring communities, we recommend that the parking standards be research-based, using data on the number of vehicles the various land uses actually generate per dwelling unit or per commercial square foot. Failure to do this may result in adverse parking impacts on nearby R- and R-2 residential streets.
- 3) Many of the lot coverage maximums are too high – see comments on individual zoning sheets.
- 4) We are concerned that the FARs assigned to the sub-districts may be inappropriate given the scale of development contemplated in that sub-district. We have not tried to revise the FARs, but we recommend that the city have an architect/builder team peer review ALL the FARs to gauge their appropriateness.
- 5) The zoning sheets set maximum percents of primary land uses within each zone, but the document does not explain how this will be achieved. For example, the primary land uses for C-3 are retail 50% max, office 50% max. What will happen, say, when the retail land uses in C-3 reaches 50%, and the next developer wants to add retail? Will you turn him down? We must have an understanding of how the process to enforce the primary land use maximums will work.
- 6) As you review changes we recommend to the individual zoning sheets (attached), note that we believe additional sub-districts should be added to the “Neighborhood Transition Combining District” overlay.
- 7) We believe too much retail is permitted along H St. Permitting this much retail a) is inconsistent with the Grand Boulevard concept, b) will generate too many driveways which will impede traffic flow on this important arterial, and c) will detract from the effort to attract retail to Third Ave. With the exception of UC-7 and UC-10, we believe only minimum amounts of retail space should be allowed along the Grand Boulevard.
- 8) A portion of UC-10 between Broadway and Woodlawn, as well as the western part of UC-11 (see att. map), is a stable, well-kept single-family neighborhood. The General Plan provides the OPTION ONLY

for UC-10 to become a replacement location for the Chula Vista mall. NO redevelopment should be entertained here unless the City Council makes an affirmative decision to relocate the mall. Failing that, this integral neighborhood should not be rezoned to permit office and higher-density residential uses. The solution seems to be to put the portion of UC-10 east of Woodlawn and UC-11 into some special status contingent upon a decision to relocate the existing mall.

- 9) See comments on Chapter IV – add regulations for development adjacent to an historic site.
- 10) Building setbacks from the sidewalk of at least 15 feet should be required along E and H Sts. to emphasize their status as east-west boulevards.
- 11) Special requirements should be included for proposed residential development in the zoning sheets for all sub-districts within 500 feet east of I-5, pursuant to the advice of the California Air Quality Board. South to north, these include sub-districts 10, 12, 14, 15, 18, and 17.

12) Minor Zone Boundary Adjustments – See attached map.

13) Building Heights

- The plan permits development of up to 84 feet on portions of Third Avenue between F St. and G St. Eighty-four feet is simply unacceptable here as it would destroy the rhythm and fabric of the most historic district in our city. The entire strip along Third Ave. Third between E and G Sts. should be limited to 45 ft.
- We believe the height of zone C-3 could be increased to 60 ft. This is an important commercial corridor linking Chula Vista and National City. If this occurs, this sub-district should become one of the “Neighborhood Transition Combining Districts.”

**p. 12: Primary Land Uses.** Although the text says there is no minimum use requirement, in fact UC-12 and UC-15 contain minimum requirements for certain land uses. This should be corrected and/or explained further.

**p. 44: Parking Structures.** Add a requirement that all parking structures must include a shade structure (e.g. overhead trellis) on the top floor.

**Chapter VII. Development Design Guidelines** See comments in attached “marked-up” pages of the chapter. For the most part, this chapter is very good. Other than the comments on marked-up pages (attached), our major issue is that the concept of harmonizing change (General Plan theme 8) is not presented well or emphasized. In order to correct this deficiency, we suggest that the last bullet under Goals on page 2 be expanded. This bullet states:

*preserve and maximize the image, character, and history of Chula Vista’s Urban Core.*

We are working on a new section we think should be added to the Design Guidelines chapter on exactly what the words *image* and *character* mean in the context of northwest Chula Vista, and that gives examples of sites and buildings that represent this image and character and history, and provides some guidance to architects who will be doing projects in northwest. We will provide this as soon as possible.

### **Chapter VIII. Public Realm Design Guidelines**

**p. 8: Streetscape Treatments for Third Ave.** What about D to E St. and K to L St?

**p. 18: F Street (Fourth Avenue to I-5).** Wider sidewalks are required to achieve the “..primary goal is to create a pedestrian promenade...” A standard five-foot sidewalk is not consistent with the “primary goal”.

**p. 19: H Street (Third Avenue to I-5).** To “...function as the main boulevard for the Urban Core,” building setbacks of at least 15 ft. are necessary. In addition, the area adjacent to the curb is designated a sidewalk, when in fact it is really a zone for trees and light standards. Figure 8.22 should be revised to reflect these changes.

**p. 24:** Figure 8.29 depicts Woodlawn Avenue as having a ROW of approaching perhaps 100 feet in order to accommodate the Promenade, a vision of a tree-lined extended linear park. However this vision was established before the Holiday Gardens condominiums were removed from the UCSP area. Given this fact, plus the questionable reality of acquiring this much additional ROW along this street (the current ROW of Woodlawn is 60 feet [Fig. 5.11]), whether this vision can be achieved should be reconsidered. This same issue should be addressed in Chapter III. Vision.

**p. 44:** We think I-5 and F St.’s designation as a “primary” gateway should be changed to a “secondary” gateway. In order for F Street to serve its purpose as a pedestrian-friendly promenade joining downtown, the civic center and the Bayfront, we believe it should be seamless. Status as a secondary gateway would be more appropriate.

**p. 46:** Fourth Avenue/C St., as the historic entrance to the city, should be designated a primary gateway.

**p. 53:** Fig. 8.69 may be the most important figure in the plan, but no reference to or explanation or description of this figure is in the text of the document. We have the following specific questions which should be addressed in the text:

- Third Avenue is designated a “Plaza Corridor.” What does this mean? What special design treatment is incorporated into Third Ave. to justify this special designation?
- What is the logic or idea underlying the specific locations of “proposed plazas” and “paseo connections”?
- Since H St. is such an important corridor, why are there no paseos shown connecting the neighborhoods to the north and south with H St., as is mentioned on page 58?

- Why are so many plazas located along H St? The traffic projections for this street do not make it conducive to pedestrian plazas. We believe the promenade concept for F St. lends itself better to a series of plazas.

**p. 54: Recommended Park Facilities.** 15-20 acres of new parkland is recommended in the UCSP, including 12-15 acres west of Broadway between E and H Sts. But no guidance or program or plan is presented for acquisition of land and construction to bring these parks to reality. (Note that while Appendix D is described as “The key bridge from the plan and its regulations into public facilities...”, but in fact it offers absolutely no guidance on how to turn the plan for parks into real parks.)

In addition, Chapter X, page 19 says, “Each potential park site should be located as specified in the updated Parks and Recreation Master Plan.” We will look forward to reviewing this updated plan.

### **Chapter X. Plan Implementation and Community Benefits Program**

**p. 26: Community Benefit Analysis.** The requirement for “a memorandum form statement of the applicant” should be included in Chapter VI to make it a regulation instead of a policy. This requirement should also be addressed in Chapter XI under the Urban Core Development Permit process description.

### **Chapter XI. Plan Administration**

1) **Urban Core Development Permit.** This section gives way too much power to the Executive Director of the CVRC and the Zoning Administrator in that it allows them to administratively approve “small-scale projects.” The way “small-scale” is defined makes it likely that the vast majority of infill projects will be approved administratively.

For the first two to three years after the UCSP is adopted, especially given that the CVRC is also brand new and its Executive Director has not even been hired yet, ALL projects in the UCSP area should be reviewed by either the Planning Commission or CVRC, except perhaps minor building additions and alterations.

Second, we remain concerned over lack of a design review process for projects that go to the CVRC. Except for one or two individuals, the members of the CVRC do not have training and expertise to make design judgments. Projects like the Police Station are the result. Whether or not you like the architecture of the Police Station, everyone we have spoken to acknowledges it does not fit in with the “small-town feel” called for in the Village district. Unless a strong design review process is put in place, the result will be more Police Stations.

2) **Permitted Land Uses.** While we do not object to the Community Development Director determining whether a proposed use is similar and compatible to a listed use and may be allowed upon making certain findings, the plan does not explain how the public will be notified when such an administrative decision is made so that they may

appeal it if they disagree. The right to appeal is meaningless without public notification of administrative decisions.

3) **Specific Plan Amendment.** Although a few examples are given on page 10, the difference between a major and minor amendment is not defined in the plan. Minor amendments can be approved administratively if determined by the Community Development Director to be in substantial conformance to the plan, but may be appealed. However, like item 2 above, the right to appeal is meaningless without public notification of an administrative action. How will staff distinguish between a minor and major amendment? What will the notification process of administrative decisions for minor projects be?

**p. 3:** The bulleted requirements for projects exceeding 84 feet should also be incorporated in the regulations in Chapter VI.