



**PLANNING & BUILDING DEPARTMENT**

June 9, 2008

Mr. Devon Muto  
County of San Diego  
Department of Planning and Land Use  
5201 Ruffin Road, Suite B  
San Diego, CA 92123

**Subject: Comments on the NOP of a Draft Program EIR for the County of San Diego General Plan Update (SCH #2002111067) LOG NO. 02-ZA-001**

Dear Mr. Muto:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for the County of San Diego General Plan Update Draft Program Environmental Impact Report (PEIR). The City of Chula Vista received the NOP for the proposed project on April 30, 2008.

The City of Chula Vista's boundaries about three Planning Areas within the County of San Diego jurisdiction: Otay to the east and south, Jamul/Dulzura to the east and north, and Sweetwater to the north. The EIR will have to analyze any impacts associated with proposed changes within these three Planning Areas on the City of Chula Vista, and provide adequate mitigation.

Each alternative analyzed in the Program EIR should use for its background land use assumptions in the recently adopted City of Chula Vista General Plan Update (December 13, 2005). A copy of this document can be found on our web site at [www.chulavistaca.gov](http://www.chulavistaca.gov).

Biological Resources

The EIR must analyze the GPU in accordance with the City of Chula Vista's Multiple Species Conservation Program (MSCP), the Otay Ranch Resource Management Plan (RMP) Phases 1 and 2, and the Otay Ranch General Development Plan (GDP)/Subregional Plan (SRP). Various projects located adjacent to the City's MSCP Subarea Plan Preserve will be required to adhere to the provision of the Subarea Plan (Section 7.5.2 – Adjacency Management Guidelines) in order to reduce any potential indirect impacts to the Preserve. The EIR must also consider impacts from those projects located within the unincorporated areas of Otay Ranch to the RMP and GDP and as necessary identify adequate mitigation measures.

### Hydrology and Water Quality

Drainage basins that are co-located in both the City and the County should be adequately analyzed and mitigated for county-related growth.

### Land Use Planning

The EIR should clearly identify impacts of any proposed land use changes on the City of Chula Vista as a result of proposed changes to the County General Plan. Please provide a table showing the existing and proposed land use changes, new land use categories, acreage changes within each land use category, and density increase or decrease within each of the 3 planning areas abutting the City of Chula Vista. It was difficult to decipher proposed land use changes from the various maps posted on the County's website.

Otay Landfill: Please indicate if any changes are proposed for the landfill and provide full description of the changes. The EIR must include an analysis of impacts of the changes to the City of Chula Vista and identify adequate mitigation measures.

### Public Services

Police, Fire and emergency services may be required from the City of Chula Vista, which would place demands on the City's safety service. Other public services to be provided by the City of Chula Vista to county residents include recreational needs such as parks, and schools. Impacts to these services must be analyzed and all mitigation identified in the EIR.

### Transportation and Traffic

The EIR must analyze impacts to the City of Chula Vista's circulation network as a result of changes to the General Plan. Appropriate mitigation must be identified, including how the mitigation will be implemented and the cost of all mitigation measures.

Please be advised that the City of Chula Vista is presently working with SANDAG to update the City of Chula Vista's land use inventory based upon the City's Adopted General Plan. Series 11 does not have the City of Chula Vista's Adopted Land Uses and Circulation Element.

The following roads are of particular concern:

- La Media Road and La Media Road Bridge
- Heritage Road and Heritage Road Bridge
- Proctor Valley Road, east of Agua Vista Drive
- Otay Lakes Road east of Lake Crest Drive

- Willow Street Bridge
  - Bonita Road
- a. The EIR should assess the direct and cumulative impacts to the City's circulation system and recommend mitigation measures.
  - b. The EIR must assess the impacts of proposed changes to the County's General Plan that will result in an increase in allowable land use intensities/densities in the County's jurisdiction an/or in the sphere of influence areas. The County's sphere of influence includes portions of Sweetwater/Bonita, Jamul/Dulzura and the Otay Mesa areas.
  - c. The EIR should identify any inconsistencies between the City's and County's planned roadway system.
  - d. The EIR should identify any City Circulation Element roadways that are proposed to be reclassified and/or realigned within the sphere of influence areas.
  - e. The EIR should use the City's Public Road Standards criteria for the assessment of the roadway system with the City's jurisdiction.
  - f. The EIR should use the City's Public Road Standards criteria for the assessment of the roadway system within the City's jurisdiction.

The EIR traffic analysis should include other modes of transportation such as pedestrian and bicycle usage. The GPU and EIR should address non-motorized transportation methods and provide connectivity between the City of Chula Vista and County for all residents' use.

#### Utilities and Service Systems

Sewer: The EIR must identify any area within the County that requires sewer service from the City of Chula Vista, analyze potential impacts and provide adequate mitigation. Any proposed development within the City's sphere of influence that requires the use of City sewer facilities should be analyzed as a possible annexation to the City of Chula Vista.

#### Cumulative Impacts

The EIR must adequately quantify all cumulative impacts relating to growth within the County as it relates to the City of Chula Vista, and identify adequate mitigation measures to reduce impacts.

We appreciate the opportunity to comment on this NOP and look forward to working with you during the preparation of the EIR and to reviewing the completed document. The City of Chula Vista requests notification prior to any and all scheduled public meetings, hearings, and workshops, and availability of draft documents related to the proposed project. Please send notices to my attention. If you have any questions regarding the above comments, please contact me at (619) 585-5707.

Sincerely,

A handwritten signature in cursive script, appearing to read "Marilyn R.F. Pongeggi".

Marilyn R.F. Pongeggi  
Principal Planner

Cc: Nancy Lytle, Acting Director of Planning and Building  
Ed Batchelder, Advance Planning Manager  
Kirk Ammerman, Principal Civil Engineer  
Frank Rivera, Principal Civil Engineer