

A-4 CITY OF CHULA VISTA

Comment Letter A-4



Development Services Department

Advance Planning Division

April 16, 2018

Gregory Mattson
Mark Slovick
County of San Diego, Planning and Development Services
5510 Overland Avenue, Suite 110
San Diego, California 92123

Delivered via email: Gregory.mattson@sdcounty.ca.gov; Mark.Slovick@sdcounty.ca.gov

RE: Otay Ranch Village 14 and Planning Areas 16 and 19, LOG NO. PDS2016-ER-16-19-006; SCH NO. 2016121042. PROJECT NUMBERS: PDS2016-GPA-16-008, PDS2016-SP-16-002, PDS2016-REZ-16-006, PDS2016-STP-16-027, and PDS2015-TM-5616

The City of Chula Vista (City) has reviewed the various documents associated with the proposed Otay Ranch Village 14 and Planning Areas 16 and 19 (Project). Village 14 and Planning Areas 16 and 19 are part of the Otay Ranch project that was jointly entitled by the City and the County of San Diego (County). The Otay Ranch includes a biological preserve that is jointly managed by the City and the County. The proposed Project consists of County General Plan Amendments, County Rezones, Otay Ranch General Development Plan/ Subregional Plan Amendments, a Specific Plan and a Tentative Map including a Preliminary Grading Plan. Specifically, the project proposes 1,119 homes on approximately 1,284 total acres within an approximately 860 acre development footprint. Approximately 994 of the 1,119 homes will be located in Village 14 and will be single-family detached homes. Within Village 14 there are 878 homes located within gated neighborhood enclaves and 116 non-gated homes located in the South Village area. In addition, there are 13 one-acre estates in PA 19 and 112 Ranchettes, averaging 3 acres in size, located in PA 16. The project also includes an elementary school, a public safety site with a fire station, a Village Green (7.2-acre park located within Village 14), a mixed use site including neighborhood commercial uses, four public parks, three swim clubs, trails and other recreational facilities, 424 acres of biological open space and 127 acres for limited development areas. The following are the City's comments:

LAND USE AND PLANNING

The City has the following comments regarding Section 3.1.3 Land Use and Planning of the Otay Ranch Village 14 and Planning Areas 16 and 19 Environmental Impact Report dated February 2018 and Appendix 3.1.3-1

A-4-1

A-4-2

I A-4-3

A-4-4

General Plan Amendment Report/Plan Consistency Analysis dated February 2018.

↑ A-4-4
Cont.

1. While the Project Description in the EIR includes a Project Terminology section, the project documents should be titled so that it is clear to readers that the Project only includes a portion of Village 14 under the applicant's ownership, i.e. Otay Ranch Village 14 (por) and Planning Areas 16 and 19 Environmental Impact Report.
2. Page 1-4, correct the last sentence under the definition of Proposed Project, "In addition, the "inverted L" is excluded from this analysis, since it is not owned by the applicant and is within the City of Chula Vista (the property is owned by the Otay Water District and the U.S. Fish and Wildlife Service (USFWS))." While the majority of the "inverted L" is owned by the Otay Water District and USFWS, there are parcels still in private ownership. Please correct within all Project documents.
3. Appendix 3.1.3-1, page 18, correction to date shown in strikeout/underline to "As discussed further below, the County adopted the MSCP County Subarea Plan in 1997, which incorporated portions of the Phase 1 and Phase 2 RMPs. In addition, in ~~1997~~ 2007 (GPA 06-12), the County adopted amendments to the Otay Ranch GDP/SRP and Phase 1 RMP which eliminated the coastal sage scrub requirement within the Otay Ranch GDP/SRP and Phase 1 RMP.
4. Appendix 3.1.3-1, page 35, proposed amendments to the GDP/SRP related to Cultural Resources are not being made to the latest GDP/SRP. The County amended this section in March 2000 (GPA 00-01).
5. Appendix 3.1.3-1, page 36-38, proposed amendments to Land Uses within the Proctor Valley Parcel are confusing. The Project only includes land under the applicant's ownership yet the amendments appear to represent changes for the entire Village 14 and Planning Areas 16 and 19. The underlying City of Chula Vista General Plan and Otay Ranch GDP/SRP land uses on land in private ownership within the "inverted L" are still valid and should not be amended with this proposed project. Additionally, the underlying County General Plan and Otay Ranch GDP/SRP land uses for state owned property within Village 14 and Planning Area 16 should remain.
6. Appendix 3.1.3-1, Table 4, it is unclear from footnote 5 how and why the acreage for additional RMP Preserve was calculated. Additional text is needed to explain the increase in the Balance RMP Preserve Acreage total.
7. The Village 14 golf course and recreation center and affordable housing are proposed to be eliminated; the transit station requirement is amended to state "potential." The village core will provide 1.7-acres of mixed-use commercial next to a 9.7-acre school site designated for 97 units (10 du/ac). If the school

↓ A-4-5

↓ A-4-6

↓ A-4-7

↓ A-4-8

↓ A-4-9
↓ A-4-10
↓ A-4-11

↓ A-4-12

↓ A-4-13

district determines a school site is not needed in the proposed location, a transit stop and affordable housing should remain as village core requirements.

↑ A-4-13
Cont.

TRANSPORTATION IMPACT STUDY

The Traffic Impact Study prepared by Chen Ryan dated February 9, 2018 lists the impacts within Chula Vista. The City requests the Project include the following conditions:

↓ A-4-14

8. Intersection impacts at Proctor Valley Road/Agua Vista Drive/Northwoods Drive. To adequately mitigate the impact, the intersection should be signalized by the 1st building permit. The Project should be conditioned to signalize intersection currently All-Way Stop Controlled, due to significant project impacts at this intersection. Project will add 6,400 project trips at this intersection (> than 800 trips) (Impact TR-7, TR-10 & TR-12).

↓ A-4-15

9. Traffic Study does not evaluate adjacent signal to the west at Proctor Valley Road/Coastal Hills Drive. The Project should be conditioned to signalize this intersection at the 1st building permit. This T-intersection is currently All-Way Stop Controlled. Project impacts would be like those at Agua Vista Drive/Northwoods Drive, approximately 6,400 trips (Impact TR-7, TR-10 & TR-12).

↓ A-4-16

10. Due to mutual aid agreements for emergency services and the need to provide quick response times, Proctor Valley Road from the intersection of Agua Vista Drive/Northwoods Drive shall be paved to connect with the proposed improvements in the County by the 1st building permit. Roadway cross-section shall transition from the County standard to the Chula Vista four-lane major standard to the satisfaction of the City Engineer (Impact TR-1, TR-3, TR-7 & TR-8).

↓ A-4-17

A majority of trips from the proposed project are identified to use the City of Chula Vista circulation system. Major planned transportation infrastructure to accommodate circulation needs have been funded through the City's Eastern Transportation Development Impact Fee program. How will the proposed project help fund the improvements that have been built or that are planned to be built that benefit the proposed project?

↓ A-4-18

RECREATION FACILITIES

The project proposes up to 19.7 acres of private and public parks to serve the proposed development. This is in excess of the 10.4 acre park obligation. While the City acknowledges this, there is concern that City recreational facilities shown below and identified in the DEIR within 5 miles of the project could be impacted by the project's residents due to the availability of organized play within the City.

↓ A-4-19

- Montevalle Community Center

- Salt Creek Community Park
- Chula Vista Community Park
- Mount San Miguel Community Park
- Mountain Hawk Park
- Mackenzie Creek Park
- Windingwalk Park
- Sunset View Park
- Scobee Park
- All Seasons Park
- Harvest Park
- Tiffany Park
- Bonita Long Canyon Park

The DEIR acknowledges that the project's residents will utilize Chula Vista middle schools and high schools and thus the City anticipates Chula Vista athletic fields will serve some of the organized recreational needs for the project.

SEWER SERVICE

The proposed project is located within the Salt Creek Sewer Basin. The City concurs with the findings and recommendations listed in the "OVERVIEW OF SEWER SERVICE FOR OTAY RANCH VILLAGE 14 AND PLANNING AREAS 16/19" dated February 2018 prepared by Dexter Wilson Engineering, Inc.

Sewer service to the Project will be provided by the San Diego County Sanitation District (SDCSD) via a sewage transportation agreement with the City of Chula Vista for service from the Salt Creek Interceptor. This will require the construction of off-site facilities within Chula Vista to the project to convey flow to the upstream end of the Salt Creek Interceptor. This agreement is for a defined service area that includes the planned Villages and Planning Areas of Otay Ranch. This agreement precludes any sewer connections for parcels outside of the unincorporated Otay Ranch Villages and Planning Areas.

In providing sewer service through the Salt Creek Interceptor, the Proposed Project will remain in the County and be annexed into and served by the SDCSD, but a sewage transportation agreement between SDCSD and the City of Chula Vista allows flows from the Proposed Project to be conveyed to the Salt Creek Interceptor.

11. Sewage Facilities Design Criteria. Final design criteria and specifications for all sewage facilities shall comply with all County requirements and policies and will be subject to review and approval by the Director of Public Works and regulatory agencies. Facilities that are constructed within Chula Vista shall be designed to Chula Vista standards or County of San Diego standards, whichever is stricter, and subject to approval by the City Engineer.

A-4-19
Cont.

A-4-20

A-4-21

A-4-22

12. Offsite Sewer Facilities within Chula Vista. A short section of offsite gravity sewer is required to get flow to the southerly lift station and from there sewage flows would be conveyed to the existing Salt Creek Sewer Interceptor along Proctor Valley Road. Sewer mains would be installed within Proctor Valley Road Right-of-Way and the 8-inch force mains would be installed to the existing 15- inch gravity main located in Proctor Valley Road, approximately 1,600 feet to the east of Hunte Parkway. Figure 5-1 depicts the location of the proposed off-site facilities necessary to connect to the existing Salt Creek Interceptor system and the proposed onsite system for Village 14. Dual 8-inch force mains (Fig. 5-1) within Chula Vistas will be the responsibility of County of San Diego to maintain.

A-4-23

13. Salt Creek Basin Impact Fees. The November 1994 Salt Creek Basin Study was prepared by Wilson Engineering to establish a fee to fund future improvements to the Salt Creek Interceptor System. This fee is required to be paid by all future developments within the Salt Creek Drainage Basin to fund improvements required to serve ultimate development within the drainage basin. The Salt Creek Interceptor Development Impact Fee (DIF) was updated in 2004 and still included the County properties (e.g. Village 14 and Planning Areas 16/19) in the service area and fee calculation. The 2004 DIF update established the Salt Creek Interceptor Fee to be \$1,330 per EDU.

A-4-24

The City of Chula Vista adopted a new Salt Creek Interceptor DIF in July 2015 based on the June 2015 Development Impact Fee Study prepared by Bartle Wells Associates. This study removed County properties, including the Proposed Project, from the study area and proposed that the DIF remain at \$1,330 per EDU. The June 2016 sewage transportation agreement between the City of Chula Vista and SDCSD added County properties back into the Salt Creek Interceptor and requires County properties that will convey flow to the Salt Creek Interceptor to pay the Salt Creek Interceptor DIF that is in effect at the time of building permit issuance. The October 2017 Master Fee Schedule lists the current fee at \$1,441 per Equivalent Dwelling Unit. The fee is updated annually in July and effective October 1st of that year.

A-4-25

14. Salt Creek Interceptor – Cumulative Impacts. The June 2016 sewage transportation agreement between the City of Chula Vista and SDCSD includes a mapped service area of County properties that shall be allowed to be served by the Salt Creek Interceptor under the agreement. The Village 14 and Planning Areas 16/19 properties are included within the mapped service area. Furthermore, an updated hydraulic analysis for the Salt Creek Interceptor was prepared concurrently with the agreement preparation and the following stipulations were incorporated into the agreement:

A-4-26

- a. Actual sewage flows from County properties shall be measured prior to entering the interceptor sewer.
- b. County properties may discharge up to 870,000 gallons per day of wastewater to the Salt Creek Interceptor without any need for improvements to the interceptor.
- c. For flows from County properties that exceed 870,000 gpd, but are less than 1,000,000 gpd, the agreement identifies a 407-foot section of the interceptor that will need to be improved by SDCSD.
- d. For flows from County properties in excess of 1,000,000 gpd, an amendment to the agreement will be required.

In establishing the flow limitation of 870,000 gpd, the County projected a total flow of 372,873 gpd from Village 14 and Planning Areas 16/19. The current projection for the Proposed Project is 276,186 gpd which is well within the projected amount. Based on the information presented above, sewer service can be provided to Village 14 and Planning Areas 16/19 by constructing offsite sewer facilities to convey flows to the Salt Creek Interceptor and by paying development impact fees for the interceptor. No offsite improvements to the Salt Creek Interceptor are required to provide service to the Proposed Project.

A-4-26
Cont.

PUBLIC FACILITIES

The DEIR identifies the Otay Ranch GDP/SRP threshold standard of 350 square feet of adequately equipped and staffed library facilities per 1,000 residents and that the project would generate demand for approximately 1,410 square feet of additional library space. The DEIR suggests that this need would be filled by the future Eastern Urban Center planned facility in the City of Chula Vista. There is no discussion about how the additional 1,410 square feet addition would be addressed.

A-4-27

FIRE PROTECTION

The Chula Vista Fire Department (CVFD) completed a review of the Otay Ranch Village 14 and Planning Areas 16 and 19 Environmental Impact Report dated February 2018. If CVFD resources are being considered for supporting this development, it is highly recommended that the County and applicant schedule a meeting with CVFD to discuss a potential new Fire Service Agreement. At this time, CVFD will not provide resources for said development. The City has the following comments and questions:

A-4-28

A-4-29

A-4-30

15. Section 3.1.6.2.1 Fire Protection, Pages 3.1.6-18 through 3.1.6-22: The Plan states the following: *"The type and size of the permanent on-site fire station would be based on the projected call volume associated with the Proposed Project and the anticipated equipment and staffing. The fire station would include an advanced life support engine company funded by*

A-4-31

the Proposed Project. The station would be equipped with a Type I or Type II fire engine, or other, at San Diego County Fire Authority's (SDCFA's) discretion, that is suited to respond to structure fires and vegetation fires. Staffing is expected to include an interim period where two career firefighter positions and one reserve position would be provided until a unit count or similar threshold is reached, at which time staffing would include three career positions and a reserve. Depending on the number of emergency medical calls generated by the Proposed Project, the ambulance provider may elect to move a response unit to the Project Area, but that would be a decision between the SDCFA and the ambulance provider. A Fire Service Agreement would be prepared and approved by the Proposed Project applicant and the SDCFA prior to the Proposed Project's County Board of Supervisors hearing."

A-4-31

"As previously discussed, this proposed fire station would be able to provide first-engine response to Village 14 within the San Diego County General Plan's 5-minute travel time standard, and to Planning Areas 16/19 within the 10-minute travel time standard. The closest existing SDCFA station is Fire Station No. 36 in Jamul, which is within a 2.5- to 10-minute travel time to the Proposed Project. Station 36 averages roughly one call per day and would have capacity to assist as a second-responder engine. Station 36 is staffed with seven career firefighters and is equipped with a Type I fire engine, a ladder truck, a rescue squad truck, a light and air unit, and a paramedic ambulance."

- a. The City is concerned over the uncertainty of proposed equipment to be staffed at SDCFA's discretion. Village 14 Fire Station would be equipped with a Type I, or Type II, or other, at SDCFA's discretion. Please be specific with type of apparatus to be deployed.
- b. There is also concern regarding the expectation that Staffing will include an interim period where two career firefighter positions and one reserve position would be provided until a unit count or similar threshold is reached at which time staffing would include three career positions and a reserve. Please provide the unit count and/or similar threshold to be reached at which time staffing would include three career positions.
- c. Station 36 is staffed with seven career firefighters and is equipped with a type 1 fire engine, a ladder truck, a rescue squad truck, a light and air unit, and a paramedic ambulance. With this staffing model, the five different response capabilities cannot be provided simultaneously. At best, one of the five response vehicles at FS 36 would be deployable with professional firefighters that meet the intent of mutual or automatic aid agreements. Aid agreements that

A-4-32

A-4-33

A-4-34

do not incorporate similar typed response units with paid career firefighters will be problematic as aid from Chula Vista will be of a certain type (specific apparatus type with properly trained staffing) while reciprocal aid to Chula Vista will be of a lesser type and capability. The project should include fire equipment and personnel similar to those that would come to aid the project site.

↑
A-4-34
Cont.

16. Many incident types require multiple response units to mitigate the call for service. These incident types may be low in frequency; however, they are of high consequence to the public and to first responders. The next closest San Diego Rural Fire Protection District (RFPD) resources are located in Dulzura FS 35 and Deerhorn Valley FS 37 that would be in excess of 30 minutes travel time. National Fire Protection Association (NFPA) standards (1710) and fire service best practices call for a minimum of four firefighters to be on scene within 4 minutes of travel time to establish an Initial Attack Force and 14 professional firefighters to be on scene within eight minutes of travel time to establish an Effective Response Force to make entry into an Immediately Dangerous to Life and Health (IDLH) environment, as determined by OSHA (i.e., a structure fire).

↑
A-4-35

Chula Vista FS 8 is located within a 5-6 minute proximity to parts of Village 14; however, the aid agreement in place was not signed with the intent of providing service to a densely populated urban community development and therefore would no longer be accurate or adhered to.

↑
A-4-36

a. What is the average dispatch processing time for San Diego RFPD?

↑
A-4-37

b. What is the average turnout time for San Diego RFPD?

I A-4-38

17. Emergency Medical incidents will make up a majority of incidents for this project site. Transportation of patients will create an extended unavailable time for Emergency Operational Area ambulances. With overlapping incidents, this will create extended response times and unavailable times.

↑
A-4-39





18. Is the San Diego County General Plan Travel Time standard required for 100% of the calls for service for the project area? If not, what is the criteria and/or threshold for not meeting this standard?



↑
A-4-40

19. What is the response plan and standard travel times for all unit types for multi-unit responses for the following incident types?

- a. Commercial Structure Fire First Alarm
- b. Residential Structure Fire First Alarm
- c. Vegetation Fire
- d. Vehicle Fire

↑
A-4-41
↓

- | | |
|---|--|
| <ul style="list-style-type: none"> e. Mass-Casualty/Multi-Patient Incident f. Vehicle vs. Structure g. Natural Gas Leak h. Technical Rescue i. Vehicle Rescue j. Water Rescue |  <p>A-4-41
Cont.</p> |
| <p>20. How long will village 14 FS be allowed to be unstaffed for prolonged incidents and/or remote training? Unstaffed period(s) will have a significant impact on the City of Chula Vista Fire Department's response models.</p> |  <p>A-4-42</p> |
| <p>21. Will the village 14 engine company participate on strike team responses?</p> | <p>I A-4-43</p> |
| <p>22. Will the village 14 FS have emergency medical transport capability? If so, where will the backup unit come from for incidents requiring transport simultaneously?</p> |  <p>A-4-44</p> |
| <p>23. Although an agreement is in place with San Diego Rural Fire Protection District, the agreement contemplated population and building inventories at the signing date. The agreement hasn't been updated in 22 years. The VLG 13 discretionary development has significant impacts on the City of Chula Vista Fire Department. Further, the agreement doesn't cover this new development. It is highly recommended that if CVFD resources are being considered for supporting this development, a meeting be set up to discuss a potential new agreement. At this time, CVFD will not provide resources for said development.</p> |  <p>A-4-45

A-4-46</p> |
| <p>24. If the intent is to establish an aid agreement with the City of Chula Vista for fire and emergency response, Proctor Valley Rd between the City and the project will need to be improved to an all- weather surface, with the capacity to support a 80,000 GVW vehicle, and meet the City's street standards by first certificate of occupancy.</p> |  <p>A-4-47</p> |
| <p>25. Table S-1 Travel Time Standards from Closest Fire Station, Page 3.1.6-12 through 3.1.6-13: Travel time does not represent total response time, which is calculated by adding the travel time to the call processing time and to the turnout/reflex time. Generally, the call processing and turnout/reflex time would add between two to three minutes to the travel time. Table S-1 from the County General Plan establishes a service level standard, not a requirement, for fire and first responder emergency medical services that is appropriate to the area where a development is located. Standards are intended to (1) help ensure development occurs in areas with adequate fire protection and/or (2) help improve fire service in areas with inadequate coverage by requiring mitigation for service- level improvements as part of project approval.</p> |  <p>A-4-48</p> |

- | | |
|--|------------------|
| a. Table S-1 indicates standards only that aren't deemed as requirements. The threshold should be requirements. When not codified as requirements, there is no legitimate basis for meeting the standards. This will then have a negative impact on the City of Chula Vista Fire Department. | I
A-4-49
I |
| b. What are the dispatch time requirements for the SDRFPD? | I A-4-50 |
| c. What are the turnout time requirements for the SDRFPD? | I A-4-51 |
| d. What are the respective actual average times over the last five years? | I
A-4-52
I |

OTAY RANCH PRESERVE

- | | |
|---|------------------|
| 26. DEIR, Sec 1.2.1.2-Public Facilities, Services and Utilities; Public Parks, Recreation Facilities, and Trails, Page 1-20 states, "Dedicated pathways along Proctor Valley Road would be maintained by the County, and existing trails within the Otay Ranch RMP/MSCP Preserve would be maintained by either CDFW or the Otay Ranch POM." The DEIR should be corrected to clarify that there are no formal legal existing trails. Trails within the designated preserve areas are unauthorized. | I
A-4-53
I |
| 27. DEIR, Sec 1.2.1.5-County of San Diego General Plan and Otay Ranch GDP/SRP Amendments; Otay Ranch GDP/SRP Development Plan Amendments, Page 1-25, The City would appreciate additional clarification regarding the Baldwin Letter dated November 1, 1995. | I
A-4-54
I |
| 28. DEIR 1.2.1.7 Otay Ranch Resource Management Plan Amendments, Page 1-25, The current Otay Ranch Resource Management Plan Phase 2 Preserve Figure (Figure 14) shows portions of the Project where development is proposed as preserve areas. This will need to be addressed prior to or concurrent with the approval of this Project. Addressing this proposed amendment to RMP2 should also be added to Table 1-3: Proposed Discretionary Approvals and Permits. | I
A-4-55
I |
| 28. M-BI-3 Page 2.4-136, The Habitat Conveyance and Preservation mitigation measure is written specifically following the proposed Project. It has been the City's experience that the acreages of impact and associated conveyance requirements will change as grading plans and final maps are being prepared. The County may want to consider generalizing this condition so that specific acreages are not documented in the actual mitigation measure. | I
A-4-56
I |

If you have any questions concerning this letter, please do not hesitate to contact Cheryl Goddard, Senior Planner, at (619) 476-2329 or cgoddard@chulavistaca.gov.

A-4-57

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kelly Broughton', with a long horizontal flourish extending to the right.

Kelly Broughton
Director

INTENTIONALLY LEFT BLANK