

A-4 CITY OF CHULA VISTA

- A-4-1** The comment provides factual background information. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- A-4-2** The comment restates information about the Proposed Project contained in the Draft EIR, specifically information contained in Chapter 1, Project Description. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- A-4-3** The comment introduces more specific comments that follow. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- A-4-4** The comment introduces more specific comments that follow regarding Section 3.1.3, Land Use and Planning, and Appendix 3.1.3-1, General Plan Amendment Report, of the Draft EIR. Please refer to **Responses to Comments A-4-5 through A-4-13**. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- A-4-5** The comment states that the Proposed Project documents should be titled so that it is clear to readers that the Proposed Project only includes a portion of Village 14 within the Project applicant's ownership.

The County acknowledges the request; however, the documents will not be retitled. The Draft EIR is clear regarding the applicant's ownership. Please refer to Chapter 1, Project Description, of the Draft EIR, specifically page 1-3, which states: "The Project Area comprises the applicant's ownership within Village 14 and two planning areas (Planning Areas 16 and 19, referred to as Planning Areas 16/19) within the Proctor Valley Parcel, totaling 1,283.6 acres." The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

- A-4-6** The comment describes the "inverted L" portion of Village 14 ownership. The Draft EIR has been revised as reflected in ~~strikeout~~/underline in the Final EIR to state:

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) and private ownership).

- This revision does not include the identification of any new or significantly greater impacts or mitigation measures and does not constitute substantial new information pursuant to CEQA. No further response is required or provided.
- A-4-7** The comment identifies the correct approval date (2007) for County GPA 06-12. The Draft EIR has been revised to show the corrected date on page 1-25 of the Final EIR. This correction is reflected in ~~strikeout~~/underline in Appendix 3.1.3-1, General Plan Amendment Report/Plan Consistency Analysis, page 18. These revisions do not include the identification of any new or significantly greater impacts or mitigation measures and do not constitute substantial new information pursuant to CEQA. No further response is required or provided.
- A-4-8** The comment states that proposed amendments to the Otay Ranch General Development Plan/Otay Subregional Plan, Volume II (Otay Ranch GDP/SRP) related to Cultural Resources are not being made to the latest Otay Ranch GDP/SRP. The comment also states the County amended this section in March 2000 (GPA 00-01). However, the County notes that GPA 00-01 did not include the proposed Otay Ranch GDP/SRP amendment to page 420, as presented in Appendix 3.1.3-1, page 35. No further response is required or provided
- A-4-9** The comment expresses the commenter's opinion that in Appendix 3.1.3-1, pages 36-38, proposed amendments to Land Uses within the Proctor Valley Parcel are confusing. In response, the following text has been added to Appendix 3.1.3-1, to clarify the scope of amendments:

The amended Proctor Valley Parcel description includes amendments associated with Village 14 and Planning Areas 16/19 within the Project Applicant's ownership. Areas within Village 14 and Planning Areas 16/19 outside of the Project Applicant's ownership would remain consistent with the County of San Diego General Plan (2011), Otay Ranch GDP/SRP (1993) and Chula Vista General Plan (2005) land uses. Pending amendments within Village 13 are not included in the Proctor Valley Parcel description. See Otay Ranch GDP/SRP, Page 77 for a complete Proctor Valley Parcel description.

This text is reflected in ~~strikeout~~/underline in Appendix 3.1.3-1, page 36, in the Final EIR. These revisions do not include the identification of any new or significantly greater impacts or mitigation measures and do not constitute substantial new information pursuant to CEQA. No further response is required or provided.

- A-4-10** The comment expresses concerns related to the proposed amendments to land uses as presented in Appendix 3.1.3-1, pages 36-38. The comment states that the Proposed Project only includes land under the applicant's ownership yet the amendments appear to represent changes for the entire Village 14 and Planning Areas 16/19. Please refer to **Response to Comment A-4-9** above. Appendix 3.1.3-1, General Plan Amendment Report, page 36, has been revised in the Final EIR to clarify the proposed amendments only pertain to property within the Project Applicant's ownership. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- A-4-11** The comment states 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. The Proposed Project does not include any proposed amendments to the underlying County General Plan (2011) or Otay Ranch GDP/SRP (1993) for the state-owned property in Village 14 and Planning Area 16. Please refer to **Response to Comment A-4-9**. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- A-4-12** The comment refers to Table 4 in Appendix 3.1.3-1 and states it is unclear how and why the acreage for additional RMP Preserve was calculated. The Otay Ranch RMP Preserve acreage increased when the USFWS purchased approximately 137 acres of land identified as development within the "inverted L" portion of Village 14 for conservation purposes, consistent with the Chula Vista General Plan Open Space Preserve designation for that portion of the "inverted L". The associated conveyance obligation would be 161.4 acres, which is the difference in Total Open Space from Table 3 (5,656.9 acres) and Table 4 (5,818.3). The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- A-4-13** The comment restates information contained the Draft EIR and expresses the commenter's opinion that if the Chula Vista Elementary School District (CVESD) determines a school site is not needed, a transit stop and affordable housing should remain as village core requirements.

The County notes the commenter's recommendation; however, the County does not have an inclusionary affordable housing requirement. Therefore, affordable housing is not required as part of the Proposed Project. The Proposed Project includes potential transit stops within the Village 14 Village Core. Metropolitan Transit System (MTS) does not currently have plans to extend transit service into the Proposed Project. If MTS extends transit service to the Proposed Project, the potential transit stops would be

implemented within the Village Core area. This comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

A-4-14 The comment notes that the Proposed Project Transportation Impact Study (TIS), dated February 9, 2018, lists the impacts within the City of Chula Vista. The comment also requests that the Proposed Project include three conditions, which are described in comments A-4-15 through A-4-18. Please refer to **Responses to Comments A-4-15 through A-4-18**. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

A-4-15 The comment requests that the Proposed Project signalize the intersection of Proctor Valley Road/Agua Vista Drive/Northwoods Drive by the first building permit. The County does not agree with the comment.

Section 2.9, Transportation and Traffic, states that traffic associated with the Proposed Project would result in a significant impact at the intersection of Northwoods Drive/Agua Vista Drive and Proctor Valley Road under the scenarios analyzed. As analyzed in Section 2.9, Transportation and Traffic, of the Draft EIR, the Proposed Project would not result in a significant impact at the intersection until construction of the 287th equivalent dwelling unit (EDU). Refer to Table 2.9-49, which shows that mitigation measure M-TR-3, signalization of the Northwoods Drive/Agua Vista Drive and Proctor Valley Road intersection would be required prior to the 287th EDU under the Year 2025, Year 2030 Cumulative and Year 2030 Cumulative Conditions Plus Hypothetical Development of State Preserve Property. Therefore, mitigation is not required by the first building permit.

Furthermore, installation of a traffic signal at the intersection was previously made a condition of approval to the Rolling Hills Ranch project, and that project has provided the necessary funding to the City of Chula Vista for installation of the signal. Please see the Tentative Map Conditions of Approval for the Rolling Hills Ranch project approved October 6, 1992 by the City of Chula Vista. As described in the Draft EIR on page 2.9-87, the mast arms for the signal have already been constructed and only minor improvements are required to complete the installation. Operation of the signal is anticipated by construction of the Proposed Project's 287th EDU as described above; however, should the signal not be in place and operational at this time, the Project applicant will complete installation of the signal, subject to reimbursement from the City's Traffic Signal Fee Program for all funds expended for such completion.

A-4-16 The comment requests that the Proposed Project be conditioned to signalize the intersection of Proctor Valley Road / Coastal Hills Drive by the first building permit. The County does not agree with the comment.

The comment is based on the assumption that since the adjacent Proctor Valley Road and Northwoods Drive/Agua Vista Drive intersection would be significantly impacted by the Proposed Project that the Coastal Hills Drive intersection would be significantly impacted as well.

According to the *City of Chula Vista Guidelines for Traffic Impact Studies, February 13, 2001*, traffic studies are required to review local and collector roadway facilities not included in the CMP network based on direction provided by the City Engineer (Section III, Item A).

Coastal Hills Drive is a local roadway not included in the CMP network. The City of Chula Vista Transportation Engineer approved the project study area prior to the analysis being undertaken, and did not request evaluation of the Proctor Valley Road/Coast Hills Drive intersection. The installation of a traffic signal at the Proctor Valley Road/Coastal Hills Drive intersection was previously made a condition of approval to the Rolling Hills Ranch project, and that project has provided the necessary funding to the City of Chula Vista for installation of the signal. Please see the Tentative Map Conditions of Approval for the Rolling Hills Ranch project approved October 6, 1992 by the City of Chula Vista.

Further, the intersection of Proctor Valley Road/Coastal Hills Drive is a different configuration than the Proctor Valley Road and Northwoods Drive/Agua Vista Drive intersection. In response to the comment, ChenRyan performed traffic counts at the intersection and analyzed the potential impacts associated with the Proposed Project. Based on the analysis performed by ChenRyan, the intersection would operate at an acceptable level of service under all study scenarios as indicated below:

Proctor Valley Road/Coast Hills Drive Peak Hour Intersection LOS results

Scenario	AM Peak Hour		PM Peak Hour	
	Delay	AM LOS	Delay	LOS
Existing	9.3	A	8.5	A
Existing + Project	29.6	D	16.3	C
Year 2025	26.3	D	33.9	D
Year 2030	16.5	C	35.0	D

- A-4-17** The comment states that, 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/Northwoods Drive should be paved to connect with the proposed improvements in the County by the first building permit. The comment also requests that the Proctor Valley Road cross-section within the City of Chula Vista be constructed as a Four-Lane Major standard.

The Draft EIR, Appendix 3.1.6-1, Public Facilities Financing Plan, and Appendix 3.1.1-2, Fire Protection Plan, describes the Proposed Project phasing program for the construction of Proctor Valley Road. As stated in Appendix 3.1.1-2, “Access roads would be at a minimum provided first layer of pavement prior to combustible construction occurring.” Therefore, it is anticipated that this roadway would be constructed to at least the first layer of pavement during the first phase of construction. The County will consider this comment and condition the Proposed Project accordingly.

As to Proctor Valley Road’s cross section within Chula Vista, the Proctor Valley Road transition from a two-lane roadway within the County to a Four-Lane Major within the City of Chula Vista was designed in accordance with guidance provided by City of Chula Vista staff, including the City’s Principal Engineer and Transportation Engineer. The guidance was received and discussed with City staff at a meeting on April 13, 2015. Accordingly, the transition will be constructed consistent with the City’s direction in 2015.

- A-4-18** The comment states that the majority of trips from the Proposed Project would use the City of Chula Vista’s circulation system and thus benefit from the facilities funded through the City’s Eastern Transportation Development Impact Fee program. The comment asks how the Proposed Project would help fund the improvements within the City that have been built or that are planned to be built that benefit the Proposed Project.

The Draft EIR and Transportation Impact Study (Appendix 2.9-1 to the Draft EIR) adequately evaluated the potential impacts of the Proposed Project on the area’s circulation system. The Proposed Project is not required to participate in any fee programs or fair-share programs beyond those identified the Proposed Project Draft EIR.

Furthermore, the County notes that since the Proposed Project is located in the County of San Diego, outside of the City of Chula Vista, the dwelling units and vehicle trips associated with the Project should not have been, and presumably were

not, included in the nexus analysis and fee calculation developed for the City's Transportation Development Impact Fee (TDIF) program. Therefore, collecting fees from the Proposed Project for road improvements to be built within the City of Chula Vista would violate the nexus analysis and result in the over collection of funds. Additionally, there is no precedent for projects to be developed within the County of San Diego to pay TDIF fees in the City of Chula Vista, or vice versa.

- A-4-19** The comment acknowledges that the Proposed Project provides 19.7 acres of private and public parks, which is in excess of the 10.4-acre park obligation. The comment also expresses the City's concern that City of Chula Vista recreational facilities listed in the comment and in the Draft EIR could be impacted by the Proposed Project's residents. Refer to Section 3.1.7.2.1, Deterioration of Parks and Recreational Facilities, page 3.1.7-16 of the Draft EIR, which states that, "physical deterioration of the surrounding off-site facilities (i.e., Salt Creek Community Park, Chula Vista Community Park, Mount San Miguel Community Park) is not expected to occur or be accelerated." Therefore, the Draft EIR did consider potential impacts to off-site recreation facilities in the City of Chula Vista and determined such impacts would be less than significant because the Proposed Project would provide sufficient parks and recreation facilities within the Project Area. The comment does not raise a specific issue regarding the adequacy of the analysis in the Draft EIR; therefore, no further response is required or provided.
- A-4-20** The comment states that the City of Chula Vista concurs with the analysis presented in Appendix 3.1.8-1, Overview of Sewer Service for Otay Ranch Village 14 and Planning Areas 16/19. The comment serves an introduction to comments that follow. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore; no further response is required or provided.
- A-4-21** The comment restates information contained in the Draft EIR, specifically Section 3.1.8.2, Sewer Service, and Appendix 3.1. 8-1, Sewer Services. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- A-4-22** The comment describes sewage facilities design criteria requirements that are consistent with the requirements identified in Section 3.1.8.2 and Appendix 3.1.8-1 of the Draft EIR. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- A-4-23** The comment summarizes the Proposed Project off-site sewer facilities and maintenance obligations within the City of Chula Vista. The County acknowledges

- the facilities and maintenance obligation are consistent with Section 3.1.8.2.2 and Appendix 3.1.8-1 of the Draft EIR. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided
- A-4-24** The comment provides background information summarizing the Salt Creek Basin impact fees applicable to the Proposed Project. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- A-4-25** The comment provides background information regarding the Salt Creek Interceptor DIF and notes that the Proposed Project will pay fees in effect at the time of building permit issuance consistent with the sewage transportation agreement. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- A-4-26** The comment provides background information regarding the City of Chula Vista, the capacity and provisions of the Salt Creek Interceptor and concludes:
- 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.
- The comment is consistent with the analysis contained in Section 3.1.8.2.2 and Appendix 3.1.8-1, Sewer Services, of the Draft EIR. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no response is required or provided.
- A-4-27** The comment expresses concerns regarding how the Proposed Project's estimated demand of 1,410 square feet of library space would be met.

The Draft EIR, Section 3.1.6, Public Services, analyzes the Proposed Project's impacts to libraries (pages 3.1.6-31 and 3.1.6-32). The Proposed Project is part of the Otay Ranch GDP/SRP, which was developed with the intent of joint efforts and facilities between the City of Chula Vista and the County. As such, the Otay Ranch GDP/SRP cited a future library in the Eastern Urban Center to serve the needs of the residents of Otay Ranch, including residents in Village 14 and Planning Areas 16/19. Section 3.1.6.2.4, Other Public Facilities, states "...As reported in the Chula Vista Growth Management Commission 2016 Annual Report (May 2016), a 30,000- to 35,000-square-foot library is expected to be constructed by 2021 within the Eastern

- Urban Center (Appendix 3.1.6-1).” The Draft EIR determined that this additional library space would accommodate the increased population resulting from development of the Proposed Project, and would maintain acceptable service ratios. Therefore impacts related to library services would be less than significant. Construction within the Eastern Urban Center was analyzed as part of the Final EIR (SCH# 2007041074, City of Chula Vista, 2009). Thus, the impacts from the construction of the EUC library have already been analyzed, and no further analysis is required.
- A-4-28** The comment recommends the County and applicant schedule a meeting with the Chula Vista Fire Department (CVFD) to discuss a potential new Fire Service Agreement.
- Based on the analysis contained with Section 3.1.1 of the Draft EIR, and Appendix 3.1.1-2, Fire Protection Plan, including estimated emergency call volumes and modeling anticipated travel times to respond to emergency calls, the County does not anticipate a significant need for CVFD resources to serve the Proposed Project. The CVFD and San Diego County Fire Authority have been holding meetings and will continue to work on reciprocal fire resources and mutual aid agreements. No further response is required or provided.
- A-4-29** The comment states that CVFD will not provide resources for Village 14 and Planning Areas 16/19. The Draft EIR, Section 3.1.1, Section 3.1.6.2.1 Fire Protection, Appendix 3.1-3 Wildland Fire Protection Plan and Appendix 3.1-2 Fire Protection Plan provides detailed analysis of the existing and proposed fire resources. The Draft EIR does not rely upon or assume any fire service being provided by CVFD for the Proposed Project. No further response is required or provided.
- A-4-30** The comment serves an introduction to comments and questions that follow. No response is required or provided.
- A-4-31** The comment restates information provided in Appendix 3.1.1-2, Fire Protection Plan, to the Draft EIR. The comment does not raise an issue regarding the adequacy of the analysis in the Draft EIR; therefore, no further response is required or provided.
- A-4-32** The comment expresses concern over the uncertainty of the proposed equipment to be staffed at the Village 14 Fire Station. The comment requests the Draft EIR be specific about the type of apparatus to be deployed.

As an initial matter, CEQA does not require that Draft EIRs specify the type of apparatus to be deployed at a particular fire station, as such decisions are within the

operational purview of the responsible fire district/fire marshal. Nevertheless, the Draft EIR, Section 3.1.6.2.1 Fire Protection states “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 the Proposed Project. The station would be equipped with a Type I or Type II fire engine, or other, at SDCFA’s discretion, that is suited to respond to structure fires and vegetation fires.” The Draft EIR states, “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.” It is anticipated that the Fire Service Agreement would specify the type of fire engine that will need to be provided to serve the Proposed Project.

- A-4-33** The comment requests a unit count and/or similar threshold be provided at which time staffing would include three career position.

The Draft EIR, Section 3.1.6.2.1 Fire Protection states “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....” The proposed Fire Service Agreement will determine the thresholds, costs or required trigger events, which are currently being negotiated between the Project applicant and SDCFA. Please refer to **Thematic Response – Wildfire Protection and Evacuation**. No further response is required or provided.

- A-4-34** The comment provides information regarding Station 36. The comment also expresses concerns that reciprocal response aid to Chula Vista will be of a lesser type and capability. The comment further states the Proposed Project should include fire equipment and personnel similar to those that would come to aid the Project Area.

The County does not agree with these comments. The Fire Protection Plan, Appendix 3.1.1-2, to the Draft EIR, states on page 43:

Based on current resources, there are up to three staffed fire stations with three fire agencies in the area. The SDCFA is a combination fire agency that uses both paid and reserve firefighters. Initial response to the Proposed Project would be either from Station 36 or from a temporary station located within the Development Footprint. Interim response timing threshold would be determined in a fire service agreement between the Proposed Project and SDCFA and would be drafted and ready to execute prior to the Proposed Project’s Board of Supervisor’s hearing.

Please refer to **Thematic Response – Wildfire Protection and Evacuation**. No further response is required or provided.

- A-4-35** The comment provides background information regarding NFPA guidelines, including NFPA 1710, which addresses Initial Attack Force and Effective Fight Force response times and number of responders.

The comment includes an inaccurate reference to San Diego Rural Fire Protection District (SDRFPD). SDRFPD was dissolved in 2016 and absorbed by the SDCFA.

Section 3.1.6.2.1 Fire Protection, of the Draft EIR provides details on the existing and future fire resources and states that the Proposed Project will comply with the County's adopted travel times in Table S-1 of the Safety Element of the County General Plan. The Draft EIR specifically states

Construction and operation of the proposed on-site fire station have been assumed as part of the Proposed Project and are analyzed throughout this EIR. Therefore, future construction and operation of the proposed fire station would not have any additional impacts beyond those identified in this EIR; impacts would be **less than significant**.

No further response is required or provided.

- A-4-36** The comment states that CVFD Station No. 8 is located within a 5-6 minute proximity to parts of Village 14 and that 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.

Section 3.6.1.2.1, Fire Protection, of the Draft EIR describes the region's fire resources and states:

In addition to the proposed fire station in the Project Area and the regional SDCFA fire resources, Chula Vista Fire Stations are located in the vicinity of the Project Area. Chula Vista Fire Department Fire Station No. 8 is located approximately 2.9 miles southwest of the Project Area, Fire Station No. 6 is located approximately 3.5 miles west, Fire Station No. 7 is located approximately 7.4 miles southwest, and Fire Station No. 4 is approximately 6.4 miles west/southwest (Appendix 3.1.6-1). Under a mutual aid or automatic aid agreement, the proposed fire station within the Project Area would be positioned to provide response into Chula Vista's eastern edges, and the Chula Vista Fire Department could in return provide resources for certain fire and

emergency medical emergencies within the Project Area, such as rounding out the effective firefighting force.

An updated mutual aid or automatic aid agreement may be pursued between the CVFD and SDFCA. No further response is required or provided.

- A-4-37** The comment addresses average dispatch processing time. The comment includes an inaccurate reference to San Diego Rural Fire Protection District (SDRFPD), which was dissolved in 2016 and absorbed by the SDCFA. The Fire Protection Plan, Appendix 3.1.1-3 to the Draft EIR, states

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 2 and 3 minutes to the travel time. Table 5 from the County General Plan's Table S-1 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.

The Proposed Project's impacts would be less than significant because the Proposed Project would serve the Project Area within the travel time requirements identified in Table S-1. No further response is required or provided.

- A-4-38** The comment asks what the average turnout time is for San Diego RFPD. The comment includes an inaccurate reference to San Diego Rural Fire Protection District (SDRFPD), which was dissolved in 2016 and absorbed by the SDCFA. Please refer to **Response to Comment A-4-37** and **Thematic Response – Wildfire Protection and Evacuation**.

- A-4-39** The comment states emergency medical incidents will make up the majority of incidents for the Proposed Project. The comment also expresses concern transportation of patients will create an extended unavailable time for ambulances, and that overlapping incidents will create extended response times and unavailable times. Section 3.1.6.2.1 of the Draft EIR states:

[T]his 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.

No further response is required or provided.

A-4-40 The comment asks if the County General Plan Travel Time Standard (Table S-1) is required for 100% of the calls for service from the Project Area. All parcels proposed to be developed within the Proposed Project must comply with County General Plan Travel Time Standards. The new fire station centrally located within the development will satisfy the County's General Plan Travel Time Standards. As stated on page 47 of Appendix 3.1.1-2:

The proposed fire station can reach approximately 96% of the Proposed Project's developable lots within 5 minutes of travel and Station 36 can reach approximately 1% of lots within 5 minutes of travel. The remaining 3% of lots can be responded to within 6 minutes, well within the General Plan's 10-minute travel time for semi-rural residential.

Accordingly, the Proposed Project complies with the travel time requirements in Table S-1.

The comment further asks what is the criteria and/or threshold for not meeting this standard. See above response, which indicates the Proposed Project will meet this standard. This comment does not raise an issue regarding adequacy of the Draft EIR; therefore, no further response is required or provided.

A-4-41 The comment requests response plans and standard travel times for a variety of emergency call types. Table S-1, Travel Time Standards from the Closest Fire Station, does not specify standard travel times for specific types of incidents.

As an initial matter, the comment requests information not required for purposes of conducting a compliant CEQA analysis. In addition, the County has determined that the response plan details requested are not required in a San Diego County Fire Protection Plan. The Draft EIR and Appendix 3.1.1-2 have been prepared in accordance with the County's requirements for determining significance for public services, emergency response and wildland fires and no additional analysis is required. This comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

A-4-42 The comment requests information pertaining to how long the Project’s fire station would be left “unstaffed for prolonged incidents and/or remote training.” The comment further states unstaffed periods will have a significant impact on the CVFD’s response models.

The County confirms that the station will be a “must cover” station, meaning that extended absences would not be allowed, and an engine and staffing from another area would be moved into that station to provide service continuity. This comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

A-4-43 The comment addresses the Proposed Project’s public safety site and asks whether the engine company would participate on strike teams. Please refer to **Response to Comment A-4-42**, above, for details regarding the must-cover status of the station. This comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

A-4-44 The comment requests information regarding station coverage for emergency medical transport capability and where the backup will come from if transport is required simultaneously.

There are currently six transport Advanced Life Support ambulances associated with Zone II, with move ups taking place on a regular basis. In addition, all of the SDCFA career staffed fire stations have Advanced Life Support delivery. If simultaneous transports are necessary, the back-up transport would be provided through the move-up process. It is likely that transport would come from Station 36 in that scenario. However, resource allocation has not been finalized at this time because there is no requirement or threshold required to be analyzed under the County’s Guidelines for Determining Significance – Fire Protection Plans.

A-4-45 The comment provides background information on the existing automatic aid agreement between CVFD and SDRFPD (note that the SDRFPD was absorbed by SDCFA). The County acknowledges that the existing automatic aid agreement was signed over 20 years ago. Please refer to **Response to Comment A-4-29**, which states that the Draft EIR does not rely upon or assume service to the Proposed Project being provided by CVFD. No further response is required or provided.

A-4-46 The comment states that the Village 13 Project will have a significant impact on CVFD. The comment addresses another project (Village 13) and provides the City’s

opinion regarding that project. Regarding the existing agreement, the County refers the commenter to **Response to Comment A-4-45**.

- A-4-47** The comment states if the intent is to establish an aid agreement with the City of Chula Vista for fire and emergency response, Proctor Valley Road between the City and the Proposed Project boundaries will need to be improved to support a 80,000 GVW vehicle and meet City's standards before first certificate of occupancy. Section 6.3.1 of Appendix 3.1.1-2, Fire Protection Plan, states (page 66):

Note that the existing Proctor Valley Road would be improved for its entirety. Improvements to Proctor Valley Road would be phased in to the satisfaction of the DPW and the SDCFA. Development Footprint roads would be constructed to a minimum unobstructed width of 24 feet and would be improved with aggregate cement or asphalt paving materials. There would be at least two points of primary access from Proctor Valley Road to South Village 14, Central Village 14, and North Village 14 phases, as well as the Planning Areas 16/19 phase for emergency response and evacuation. Interior residential streets would be designed to accommodate a minimum of a 75,000-pound fire truck.

No further response is required or provided.

- A-4-48** The comment provides a partial quotation from the prelude paragraph to San Diego County General Plan Safety Element, Table S-1.

The comment inaccurately states that Table S-1 establishes a standard, not a requirement. The County considers the travel time standards as requirements. Please refer to **Response to Comments A-4-37 & 39**. Accordingly, and in compliance with the County's Guidelines for Determining Significance, the Draft EIR found that the Proposed Project would have a less than significant impact on wildfire hazard (Section 3.1.1, Hazards and Hazardous Materials) and fire service (Section 3.6, Public Services). No further response is required or provided.

- A-4-49** The comment expresses that the Table S-1 is deemed a standard and not a requirement. The comment expresses the commenter's opinion there is no legitimate basis for meeting the standards, which will have a negative impact on the CVFD.

The County does consider the travel time standards as set forth in the County General Plan as requirements. New projects are evaluated based on their ability to comply with Table S-1. Please refer to **Response to Comment A-4-40**.

- No further response is required or provided.
- A-4-50** The comment restates Comment A-4-37 regarding dispatch times. Please refer to **Response to Comment A-4-37**. No further response is required or provided.
- A-4-51** The comment restates Comment A-4-38 regarding turnout times. Please refer to **Response to Comment A-4-38**. No further response is required or provided.
- A-4-52** The comment requests information on “average times” in the previous 5 years. Please refer to **Response to Comment A-4-37** regarding the Proposed Project’s compliance with County General Plan Safety Element S-1 and the County’s requirements for travel times. No further response is required or provided.
- A-4-53** The comment refers to page 1-20 of the Draft EIR, which states that existing trails within the Otay Ranch RMP/MSCP Preserve would be maintained by either CDFW or the Otay Ranch POM. The comment states that there are no formal legal existing trails and the Draft EIR should be corrected. The Final EIR, Section 1.2.1.2, has been revised in ~~strikeout~~/underline as follows:
- Dedicated pathways along Proctor Valley Road would be maintained by ~~the County~~ an HOA or an assessment district, and ~~existing any future authorized~~ trails within the Otay Ranch RMP/MSCP Preserve would be maintained by either CDFW or the Otay Ranch POM.”
- No further response is required or provided
- A-4-54** The comment refers to Section 1.2.1.5 of the Draft EIR and requests additional clarification regarding the Baldwin Letter. Please refer to **Thematic Response – Baldwin Letter and PV1, PV2, and PV3**, as well as **Responses to Comments A-3-5 through A-3-58** (CDFW) for additional clarification regarding the Baldwin Letter.
- A-4-55** The comment refers to the Otay Ranch RMP Phase 2 Figure 14. The comment states that the figure shows portions of the Proposed Project where development is proposed as Preserve areas. The comment states that this will need to be addressed prior to or concurrent with the Proposed Project. Please refer to **Response to Comment A-3-47** (CDFW) and **Thematic Response – Baldwin Letter and PV1, PV2, and PV3**. No further response is required or provided.
- A-4-56** The comment offers an opinion on how acreages and conveyance calculations may change. The Draft EIR, Section 2.4 Biological Resources, describes the intent behind the anticipated conveyance acreage within mitigation measure M-BI-3 is to ensure

that the Proposed Project conveys the appropriate amount of RMP Preserve; however, the County agrees that the ultimate conveyance amount may change if either (1) the Proposed Project does not move forward with Final Maps for the entire Project Area and/or (2) through final engineering, minor acreage refinements result in different acreages of common uses or development.

Nonetheless, the County has considered the comment and mitigation measure M-BI-3 as been revised in the Final EIR in ~~strikeout~~/underline as follows:

M-BI-3 Habitat Conveyance and Preservation. Prior to the approval of the first Final Map for the Proposed Project, the Proposed Project applicant or its designee shall coordinate with the County of San Diego (County) to establish and/or annex the Project Area into a County-administered Community Facilities District to ~~pay for~~fund the ongoing management and maintenance of the Otay Ranch Resource Management Plan (RMP) Preserve. Prior to the recordation of the first Final Map within each ~~Tentative Map~~development phase, the Proposed Project applicant shall convey land within the Otay Ranch RMP Preserve to the Otay Ranch Preserve Owner/Manager or its designee at 1.188 acres for each “developable acre” impacted, as defined by the Otay Ranch RMP. ~~At the standard 1.188 mitigation ratio, the required conveyance for this Proposed Project is 776.8 acres (653.9 acres × 1.188 = 776.8 acres). Common uses within the Project Area include 15.2 acres of public parks, the 9.6-acre elementary school site, 12.8 acres of major circulation, 3.6 acres for the on-site water tank and access road, and the 2.3-acre public safety site. In addition, Planning Area 16 contains 127.1 acres of LDA that is not subject to conveyance. Areas of Conserved Open Space are also excluded from the conveyance total (72.4 acres). Total Proposed Project impacts, less these common areas, Conserved Open Space, and LDA, and including roads within Planning Areas 16/19, is 653.9 acres. Based on the analysis in the Draft EIR, it is anticipated that the Proposed Project would convey a total of 776.8 acres, shall convey 426.7 acres of which is anticipated to be conveyed within Village 14 and Planning Areas 16/19. The remaining 350.1 acres of conveyance will shall be met through off-site acquisitions within the Otay Ranch RMP, which will then be conveyed to the Otay Ranch RMP Preserve. The actual~~

conveyance will be based on the 1.188 mitigation ratio as determined at Final Map. In addition, the BMO analysis determined mitigation requirements for areas subject to the BMO (PV1, PV2 and PV3) are more stringent for certain types of habitat than the Otay Ranch RMP Preserve Conveyance Obligation. Accordingly, the BMO analysis identified an additional 24.6 acres of mitigation, beyond the 203.5 acres required by the Otay Ranch RMP Preserve Conveyance Obligation, for impacts in PV1, PV2 and PV3, for a total of 228.1 acres. The mitigation provided for impacts to PV1, PV2, and PV3 would be like-kind or up-tiered habitat.

- A-4-57** The comment provides a concluding statement. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.