# Final
# Environmental Impact Report
# Chula Vista Woods
# EIR-84-6
# SCH#84021505

Prepared for:

City of Chula Vista
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TABLE OF CONTENTS

LIST OF FIGURES

LIST OF TABLES

## 1.0 Introduction

### 1.1 Purpose

In conformance with the California Environmental Quality Act (CEQA), this draft Environmental Impact Report has been prepared to facilitate an objective assessment of the individual and collective environmental impacts associated with the proposed General Plan Amendment (GPA), Zone Change, and Tentative Map for a 20 acre site located in the City of Chula Vista. Approval of the proposed GPA and zone change would result in a general plan land use designation of Medium Residential over a portion of the site as well as a zoning classification of R-1-P (Precise Plan) for the entire site. In addition, approval of the Tentative Map would permit the development of a 110-unit manufactured housing subdivision on the property.

The Environmental Impact Report process requires the preparation of an objective, full disclosure document to inform agency decision makers and the general public of the direct and indirect environmental affects of a proposed action; to provide mitigation measures to reduce or eliminate potential adverse impacts; and, to provide alternatives to the proposed project. The following environmental analysis addresses each of these primary EIR objectives in accordance with the City of Chula Vista's environmental quality regulations, and the State EIR guidelines.

The City of Chula Vista is the lead agency responsible for preparation of environmental documentation in compliance with CEQA and will also have responsibility for approval of the project. The County of San Diego, whose jurisdiction includes land on three sides of the property, will be involved insofar as approving the improvement plans for the proposed access road to the site.

### 1.2 Executive Summary

The impacts and mitigation measures for all of the environmental elements dicussed in this report are summarized below.

Land Use. The proposed project will be consistent with the City of Chula Vista General Plan and will be compatible with the land uses in the surrounding area. Potential impacts with existing SDG&E facilities can be mitigated by locating appropriate uses in the right-of-way, i.e. landscaping, storage, and open space, as well as ensuring continued access to the facilities and coordinating proposed improvements with sDG&E.

Geology/Soils. No seismic hazards are known to exist on the site. A geologist will be present during grading operations to conduct field inspections. No unusual soils conditions exist which cannot be mitigated by standard engineering practices.

Drainage. A slight but manageable increase in runoff volumes will occur when the project is implemented. This increase can be mitigated by a conventional storm drain system which is proposed as part of the project.

Landform. Most of the site's natural landform will be altered in preparation for the proposed project: 140,000 cubic yards of earth will be moved. This alteration is irreversible; however, 2:1 slope ratios will be maintained, a landscape plan will be implemented and the City's grading ordinance will be followed.

Biology. Significant, unmitigable impacts may occur to several sensitive plant species if the project as designed is implemented. Measures such as incorporating the sensitive area into an open space easement and economizing the size of larger lots to achieve the same overall density would serve to mitigate these impacts.

Archaeology. There are no archaeological resources located on the property; therefore, no archaeological impacts will be created.

Traffic Circulation. Traffic generated by the proposed project is considered not significant in terms of impacts to surrounding streets. A recommendation is made to provide an emergency access to the site from Brandywine Avenue, which would be abandoned when other secondary access is available.

Noise. No adverse noise impacts will occur to the project or to neighboring residents; therefore, no mitigation is required.

Public Services. No significant impacts will be incurred regarding the availability of sewer and water services due to the proposed measures included in the project. Although the property is located within the Otay Water District, the eastern half of the site will have to be annexed into Improvement District #10. The project will not impact the level of service or demand on the Chula Vista Police or Fire Departments. Regarding schools, the assessment of developer fees and the flexibility with which the school districts operate in terms of assigning future students to schools based on overcrowded conditions at a particular time, will alleviate potential project-generated impacts to the school districts.

## 2.0 Project Description

### 2.1 Location

The 20-acre project site is located between Greg Rogers Park and Brandywine Avenue in the City of Chula Vista. The western property boundary abuts the park and the eastern boundary is located 400 feet west of Brandywine Avenue. The site is located in the eastern portion of the City, about 4 miles from downtown and the civic center. The site is depicted on Figures 1 and 2 in its regional and local context.

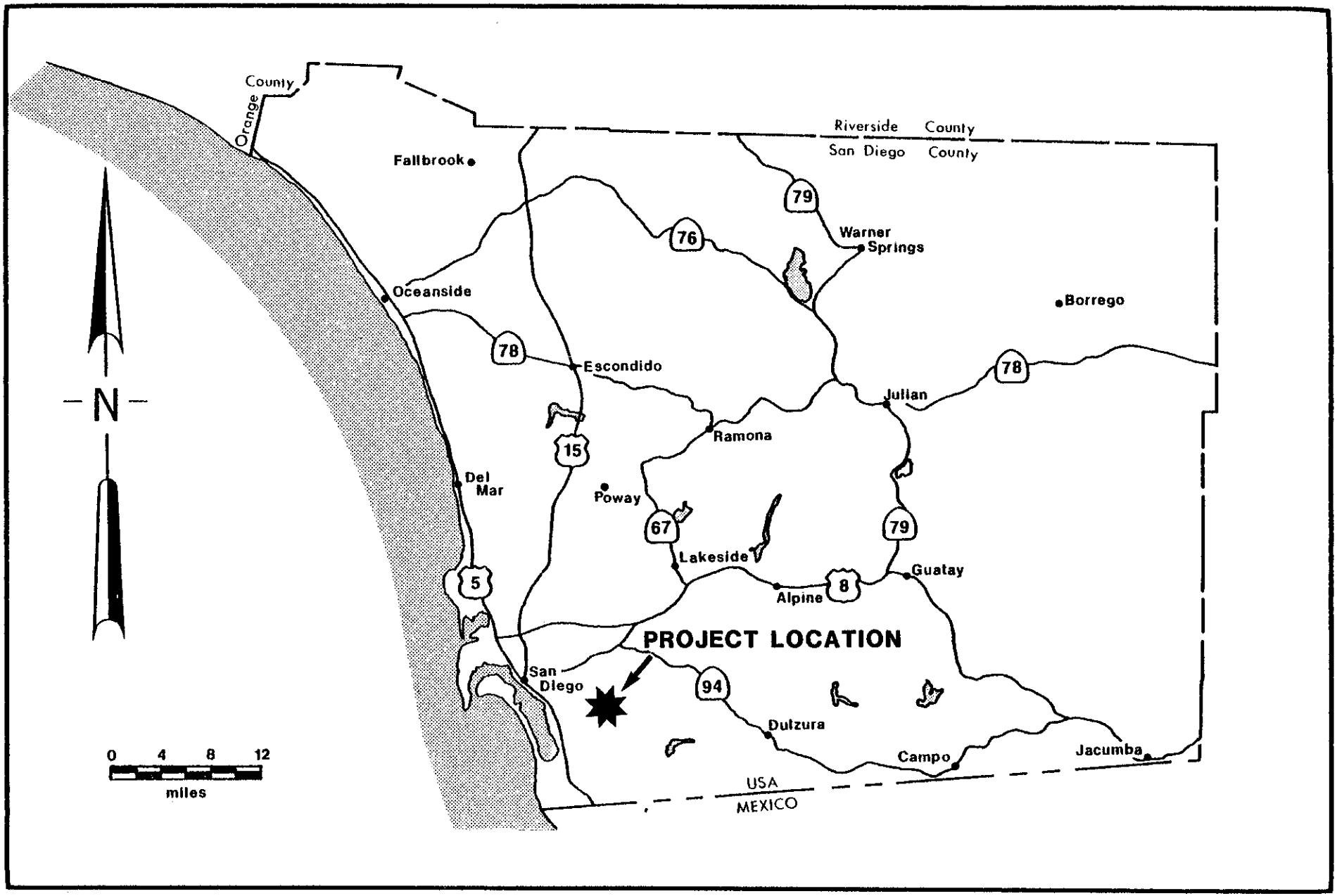
### 2.2 Project Plans

A manufactured housing subdivision of 110 units is proposed to be developed on the 20-acre rectangular shaped parcel. The development generally will be terraced from north to south, starting with higher elevations in the northern half of the property, gently terracing to the south with a total elevational difference of about 35 feet. As shown on Figure 3, the lots will be situated in three large "loops", with the largest lots found near the corner of the property. Lot sizes will average 4,675 square feet. The smallest lot will be 3500 square feet and the largest, 15,500 square feet.

Recreation/open space and R.V. storage areas will be located next to Greg Rogers Park, and in the northwest corner of the property. Recreational facilities will include a small clubhouse, jacuzzi and open space.

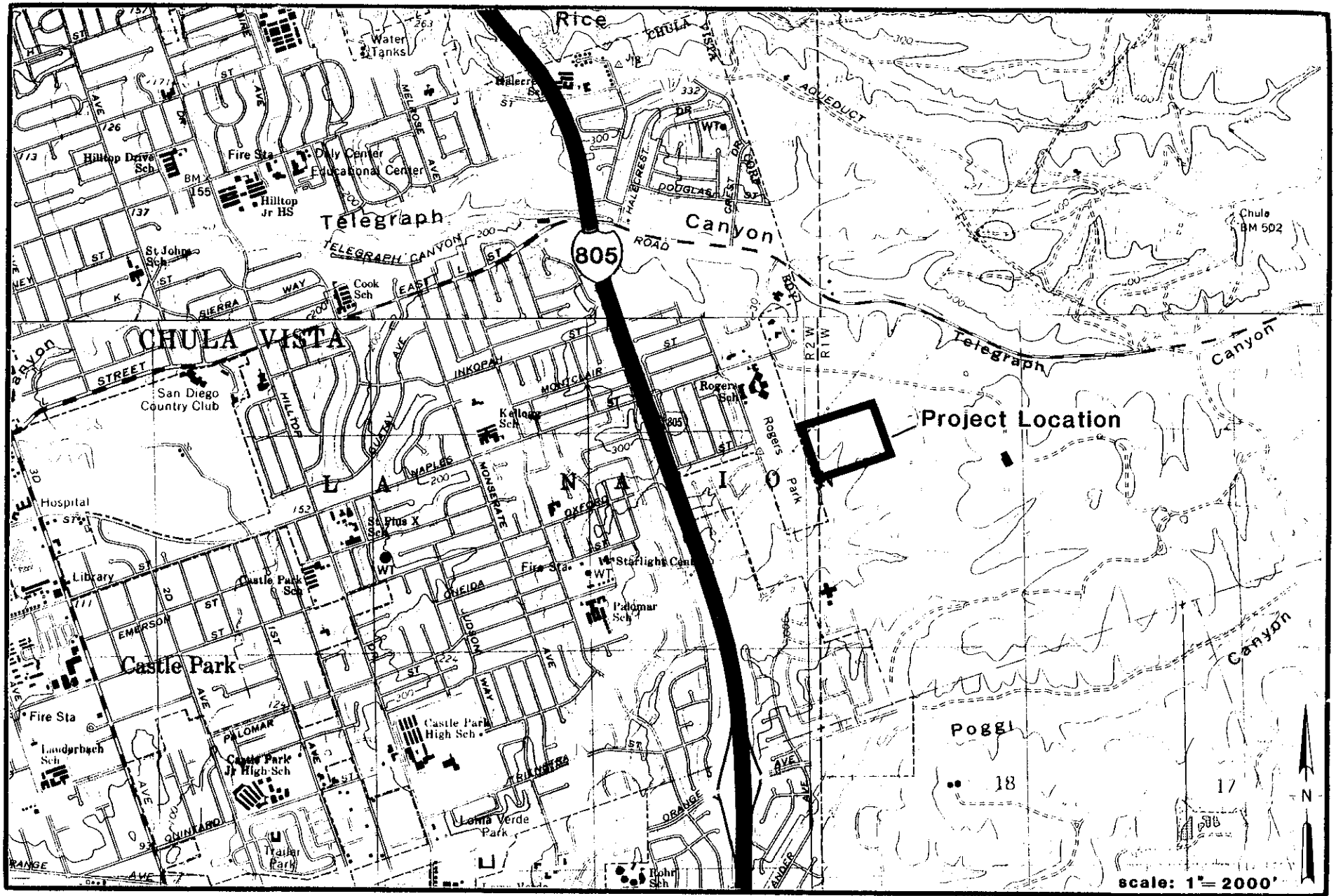
The property currently has no vehicular access. Access will be provided from the north; a public road will be extended approximately 1400 feet from the terminus of East Naples Street. This road will comprise the only access into the project (water and sewer lines will be extended south to the property along the road). Inside the property boundaries, roads will be constructed to private standards; i.e. 32-feet in width with an 8-foot parking lane on one side. A sidewalk will be located on that side also.

The term "manufactured housing" does not refer to mobile homes: the homes which will be located within this development will look like typical single family homes but they are constructed off-site in a factory and transported to the property as the homes are sold to buyers. The garages, however, are built on-site and would be attached to the homes. The homes will have pitched roofs with standard roof covering and will have stucco exteriors. Three floor plans will be availalbe, ranging from 864 square feet up to 1274 square feet. The houses will be oriented toward a generous sideyard (see Figure 4). Fence lines will be varied to heighten visual interest along the streets. The units are anticipated to sell for between $70-80,000.




PROJECT LOCATION IN SAN DIEGO COUNTY

Figure 1




PROJECT LOCATION ON U.S.G.S. 7.5'
NATIONAL CITY & CHULA VISTA QUADRANGLES

Figure 2

# TENTATIVE MAP
# CHULA VISTA TRACT 84-

0 50 100 200 300
GRAPHIC SCALE

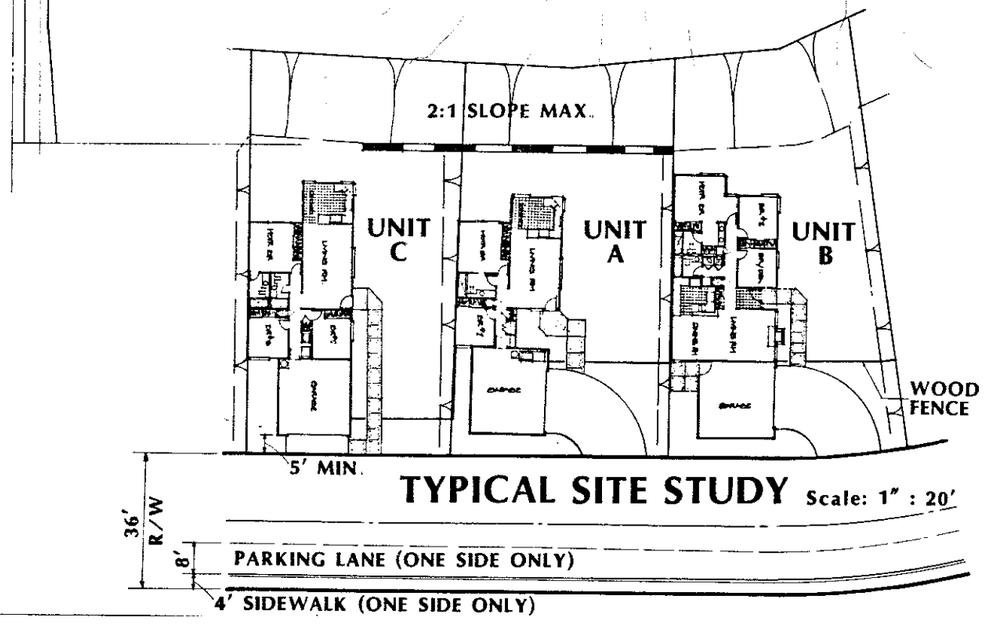
0 20 40 60 120 180 240
GRAPHIC SCALE

PROPOSED SEWER
EAST NAPLES ST.
EXIST. 16" WATER
PROPOSED FORCE MAIN
CITY OF CHULA VISTA
COUNTY OF SAN DIEGO
STREET "A"
IDENTICAL POINT
City of Chula Vista
County of San Diego
County of San Diego
City of Chula Vista

1/4 SEC. 89
664.4
EXIST. PP TO REMAIN
COUNTY OF SAN DIEGO
1/4 SEC. 68
660.2'
CRIB WALL
DRAINAGE EASEMENT
COUNTY OF SAN DIEGO
CITY OF CHULA VISTA
EXIST. 20' EASEMENT TO CITY OF CHULA VISTA FOR SEWER PER BK. 5240 PG. 90 O.R.
STREET "A"
FORCE MAIN
STREET "B"
STREET "C"
STREET "D"
STREET "E"
SEWER EASEMENT
DRAINAGE EASEMENT
OPEN SPACE ESMT
BROW DITCH
RIPRAP SLOPE PROTECTION
CITY OF CHULA VISTA
COUNTY OF SAN DIEGO
SE 1/4 OF NE 1/4 OF 1/4 SEC. 90
SW 1/4 OF NW 1/4 OF 1/4 SEC. 67
COUNTY OF SAN DIEGO

**PROPOSED TENTATIVE MAP**

Figure 3




**TYPICAL SITE STUDY** Scale: 1" : 20'

**TOTAL AREA: 20 ACRES**

**OPEN SPACE AREA: 12.3 ACRES (61.5%)**

**ON-STREET PARKING: 82 SPACES (8' X 22')**

**SUMMARY OF DWELLING UNITS:**

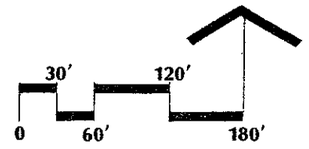
UNIT A (2 BR, 864 S.F.): 12 (11%)
UNIT B (3 BR, 1274 S.F.): 76 (69%)
UNIT C (3 BR, 1125 S.F.): 22 (20%)

**TOTAL DWELLING UNITS: 110**

**DENSITY: 5.5 D.U./ACRE**

**NOTE:**

All site details shall comply with the accompanying Performance Standards




source: HCH & associates

SITE PLAN

Figure 4

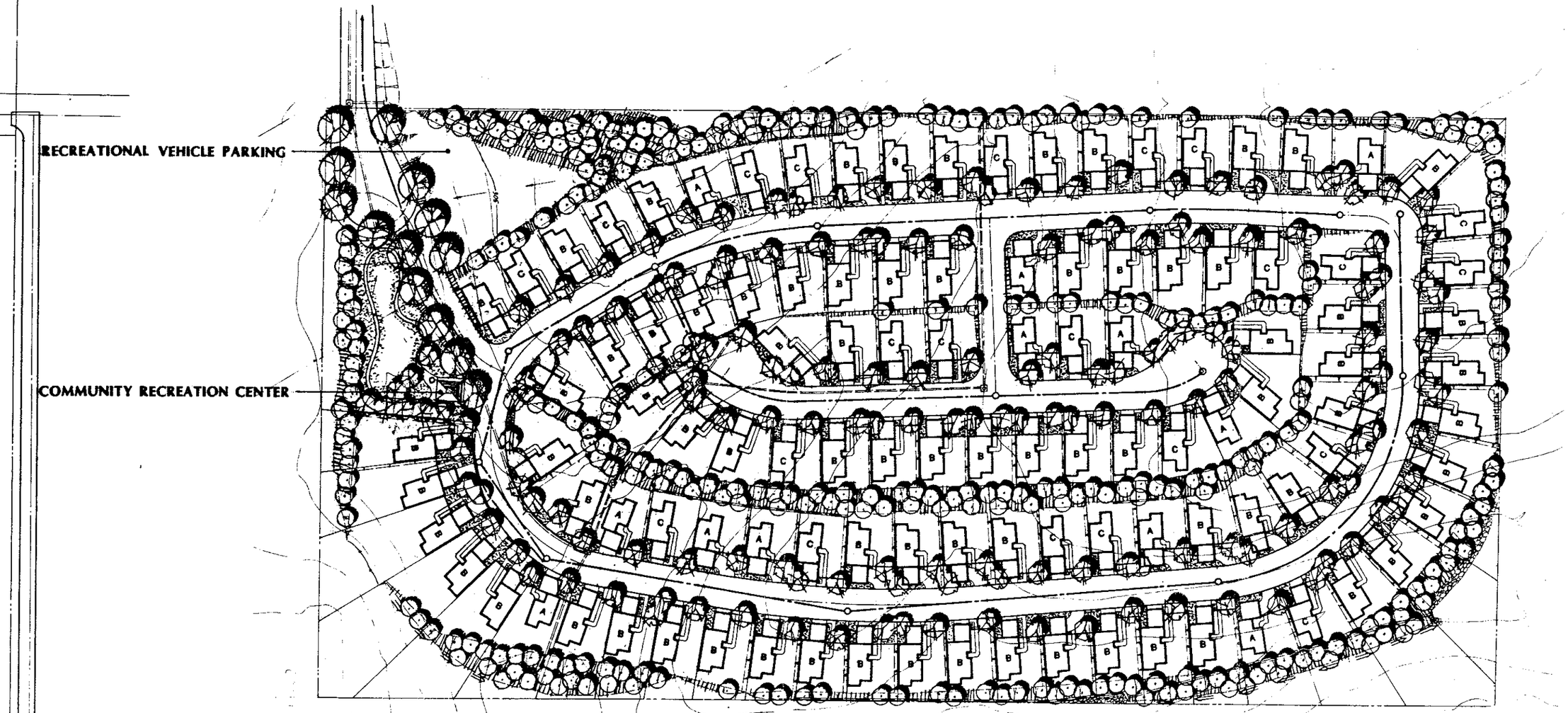
A landscape plan has been developed which will emphasize a "naturalistic character" for the project (Figure 5). Canary Island Pine trees will accent the entryway to the project; trees along the interior streets will be Strawberry Trees, providing a canopy which will break up the street scene; and, tall, vertical "Sugar Gum" trees will be planted on the slopes around the perimeter of the project as well as between the terraces.

Grading on-site will require the movement of 140,000 cubic yards of earth in a balanced cut and fill operation. The highest cut slope would be 40 feet in height and the highest fill slope, 20 feet. Crib walls will be placed in several areas; the highest one will be approximately 12 feet.

The following land use summary shows the breakdown of buildable area versus areas that will not be developed.

Table 1.
LAND USE SUMMARY

| Use | Acreage | % of Site |
|---|---|---|
| Buildings | 4.2 | 21 |
| Streets/Parking | 3.5 | 17.5 |
| Open Space (includes slope banks, yards and other landscaped areas) | 12.3 | 61.5 |
| | 20.0 | 100.0 |



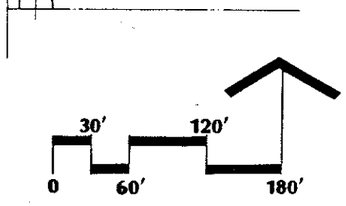

# LANDSCAPE CONCEPT PLAN

## PLANTING CONCEPT

PLANTING: THE OVERALL PLANTING CONCEPT WILL EMPHASIZE A NATURALISTIC CHARACTER OF INDIGENOUS, DROUGHT-TOLERANT PLANT MATERIAL. STREET TREES WILL PROVIDE A PLEASANT CANOPY ALONG THE ROADWAYS WHILE BREAKING UP THE STREET SCENE.

IRRIGATION: ALL PLANTING AREAS WILL FEATURE A FULLY AUTOMATED IRRIGATION SYSTEM WITH LOW PRECIPITATION SPRINKLER HEADS, SPECIAL WATER-SAVING TECHNIQUES SUCH AS DRIP IRRIGATION MAY BE USED WHEN FEASIBLE

NOTE: ALL PLANTING AREAS WILL CONFORM TO CITY OF CHULA VISTA, "LANDSCAPE MANUAL" DATED AUGUST 22, 1978




## PLANTING LIST

- ENTRY ACCENT TREE: PINUS CANARIENSIS "CANARY ISLAND PINE"
- STREET/ BUILDING ACCENT TREE: ARBUTUS UNEDO "STRAWBERRY TREE"
- TALL VERTICAL SLOPE TREE: EUCALYPTUS CLADOCALYX "SUGAR GUM"
- LAWN AND/ OR ORNAMENTAL SHRUBS
- EROSION CONTROL GROUNDCOVER AND/ OR SHRUBS

source: HCH & associates

LANDSCAPE CONCEPT PLAN

Figure 5

## 3.0 Environmental Analysis

The environmental analysis section will contain a discussion of:

- o Project Setting
- o Potential Impacts
- o Mitigation Measures
- o Analysis of Significance

for the following topics:

3.1 Land Use

3.2 Geology/Soils

3.3 Drainage

3.4 Landform

3.5 Biological Resources

3.6 Archaeology

3.7 Traffic Circulation

3.8 Noise

3.9 Public Services

- Sewer
- Fire Protection
- Law Enforcement
- Water Supply
- Schools

### 3.1 **Land Use**

#### Project Setting

The project site currently is vacant and is covered by natural vegetation. The northwestern corner of the property is located within an easement of the San Diego Gas and Electric Company; several facilities are found on-site, 138 kv transmission lines and an 8" high-pressure gas main. Several trails traverse the property which are used by motorbikes and bicycles. A small amount of debris, i.e. broken glass and beer cans, was observed.

The western boundary of the property abuts the Greg Rogers Community park. This 47-acre park includes picnic facilities, turfed play areas, a tot lot, ballfields, and open grass areas. Adjacent to the park on the north is the Greg Rogers Elementary School, and on the south is Park View Elementary School. Further west, lies urbanized areas of single family residential.

Immediately surrounding the property on the north, east and south is vacant land which lies in one private ownership. Further north are single family residences built at generally medium densities. To the east approximately 1,000 feet, the Chula Vista Community Hospital is located on Dora Lane.

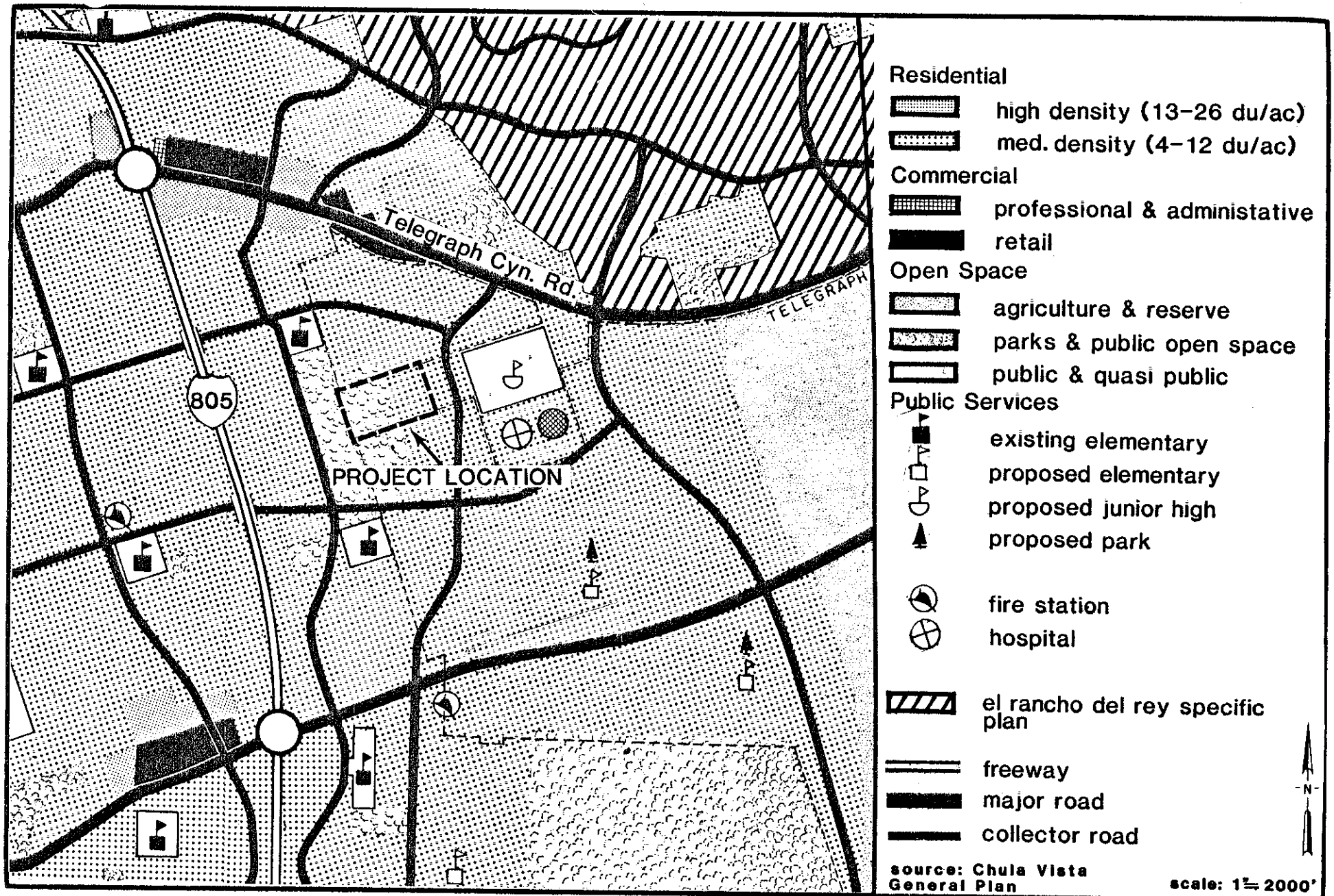
As shown on Figure 6, the Land Use Element of the General Plan designates the eastern 10 acres of the property as Medium Residential (4-12 du/ac) and the western 10 acres as Parks/Open Space. Under the current designations, between 40 and 120 residential units would be permitted. The property is zoned R-1-H, which places it in the Hillside Modifying District. According to the requirements of that ordinance, 5.5 acres would be required to remain ungraded and the maximum gross density not exceed 3.3 du/ac (Chula Vista Woods EIR-78-3).

General Plan land use designations that surround the site include those from both the City of Chula Vista and the County of San Diego. Medium-density residential categories are designated for areas to the north, east, and south (4-12 du/ac per the City's plan and 7.3 du/ac per the County's plan). To the west and southwest, Parks/Open Space is the future designated land use.

The project site is located in the eastern portion of the City, east of I-805. Generally, much of the City west of the site is developed and urbanized. However, the eastern portion of the City is beginning to develop as smaller subdivisions as well as large-scale projects like El Rancho Del Rey and Eastlake are implemented.

## Potential Impacts

The proposed project is requesting a General Plan Amendment (GPA) which will change the Park/Open Space designation on the western 10 acres to Medium Residential. In addition, a rezone is requested for the entire site changing the R-1-H to R-1-P (removing the Hillside Ordinance requirements and allowing a precise plan to be processed, which affords less stringent requirements). The GPA would allow residential uses on what could have been additional park/open space for the community, possibly an extension of Greg Rogers Park. However, this land use change to 10 acres is not considered a significant impact. Greg Rogers Park is the largest park in the city and adequately serves the surrounding area. The project site is located within Community Park District #7 and as shown on the Park and Recreation Element map of the General Plan, future parks needed within this district are proposed west of I-805. Thus, a




LAND USE DESIGNATIONS

Figure 6

10-acre park located at the project site would not readily serve those areas where parks are needed.

Potential land use impacts could occur between the proposed residential use and the existing SDG&E 138 kv transmission lines. However, it appears that the project design has addressed this concern -- as shown on the Tentative Map and Landscape Concept Plan, land uses within the easement are comprised of the roadway, parking/storage for recreational vehicles, landscaping, and a small portion of the recreation area. Mitigation measures will be set forth in the following section which will ensure that access is available to the facilities for maintenance and repair.

In terms of compatibility with the surrounding area, the project proposes a residential development at a density, i.e. 5.5 du/acre, which is compatible with the residential areas nearby. The density also is consistent with the future land use designation surrounding the property on three sides, i.e. 7.3 du/acre in the County and Medium Residential in Chula Vista. The development will not impact the park and vice versa, due to an elevational difference similar to what now exists, as well as a fence which will be placed on the boundary line to afford privacy to those lots located next to the park. Also, it is very common for parks to be located next to residential development. Finally, no conflicts are expected to occur between the activities related to Greg Rogers School and the access road since the playground area of the school is completely fenced.

## Mitigation Measures

The following measures are recommended which pertain to the potential impacts with the SDG&E facilities:

- access to and along the transmission facilities will remain available to SDG&E for purposes of repair and maintenance;
- any proposed improvements made in the transmission right-of-way will be reviewed by SDG&E;
- signs will be posted in the right-of-way to inform people using this area that SDG&E transmission lines are located nearby;
- appropriate zoning codes or CC&R standards will be enforced to ensure that people will not live in any RV which is parked in the RV storage area since it is not allowed by the California Public Utilities Commission; and
- the CC&R's developed for this project will specify the types of activities which will be allowed to occur in the RV area, i.e. the extent to which someone can work

on their vehicle, change oil, etc... consultation with SDG&E regardig appropriate safety standards is suggested when the CC&R's are developed.

Analysis of Significance

Incorporation of the above-listed mitigation measures will mitigate any potential impacts relating to the SDG&E right-of-way and associated facilities.

## 3.2 **Geology/Soils**

Project Setting

Topographically, the site is comprised of three major south to southeast draining canyons. The canyons are separated by broad ridges. The vegetation covering the ridges and much of the canyons is coastal sage scrub. The deeper canyon bottoms, however, contain some larger trees and heavy brush. The elvation of the property ranges from 275 feet above mean sea level (AMSL) near the southwestern property boundary to 350 feet AMSL near the northeastern property boundary.

The foundation of the property consists of two geologic formations and two surficial deposits. The geologic formations are the Pliocene San Diego Formation and the Pleistocene Lindavista Formation. The San Diego Formation underlies the entire site below the elevation of approximately 325 feet. The Lindavista Formation overlies the San Diego Formation. The soils formed by these formations consist of fine to medium grained cemented sand, which have excellent foundation characteristics. The two surficial deposits consist of Holocene alluvium and topsoils. The alluvium occurs in the three canyons at a thickness of 15 to 20 feet. The amount and type of vegetation growing in the canyon bottoms indicate a possible shallow water table in the alluvium material. The topsoils generally consist of expansive clays two to three feet thick.

There are no known seismic faults on-site. The La Nacion Fault is the closest fault, located approximately 700 feet east of the site (see Figure 7). The La Nacion Fault and related faults are presently classified as potentially active, however, the portion closest to the site has not been active for approximately 11,000 years. The risk of future movement within these faults does exist but is very low.

There are no known landslide areas on or adjacent to the property. Cut and fill slopes of on-site soil formations should be free of failure at slopes of 1.5 horizontal to 1.0 vertical.

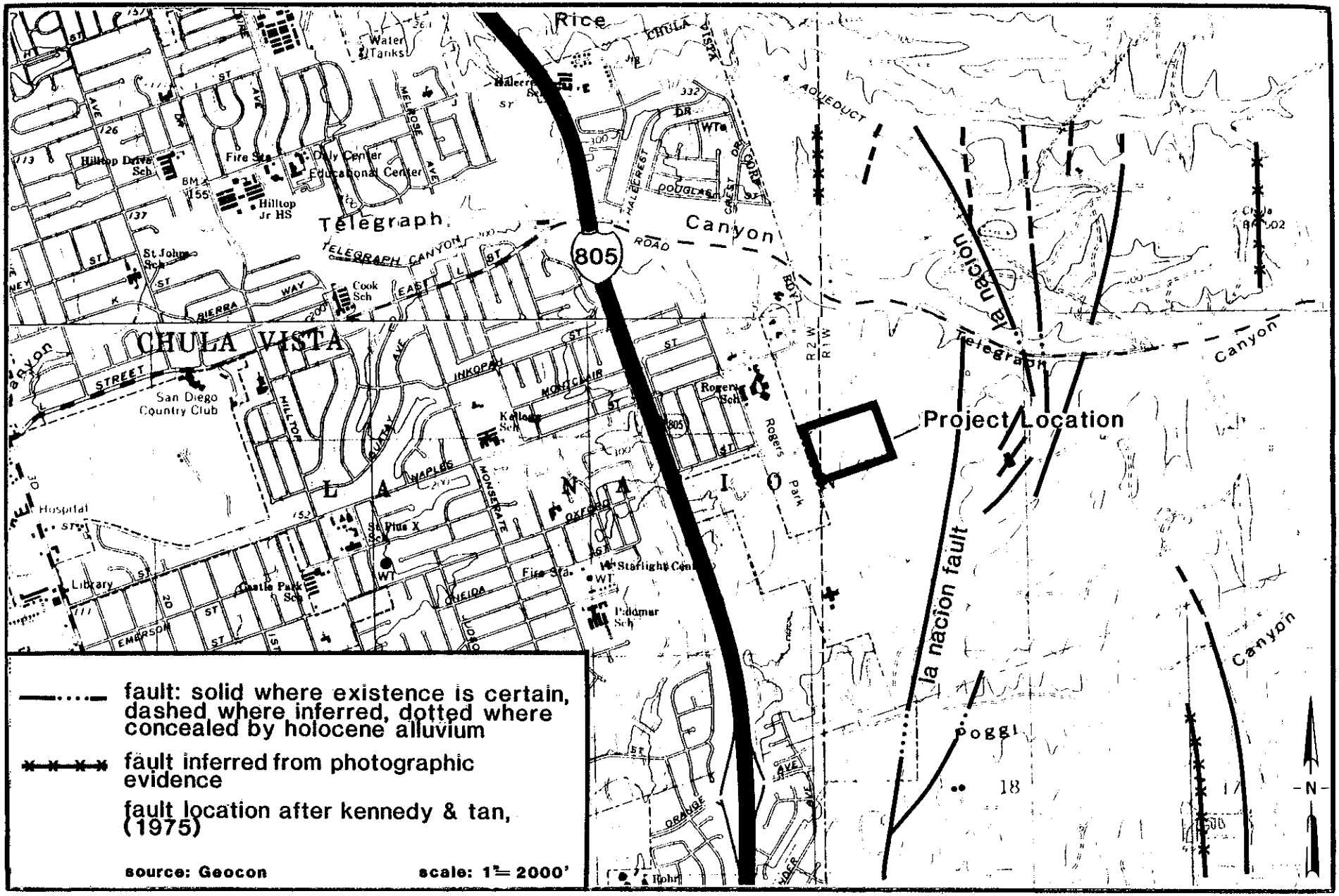
Potential Impacts

The La Nacion Fault and related faults are considered potentially active with the risk of future movement being low.

No faults are located on-site, however, the La Nacion Fault is 700 feet east of the project. A significant earthquake occurrence on the La Nacion Fault system would cause severe ground shaking. The occurrence of major seismic events occurring on any fault system cannot be predicted accurately. It can, however, be expected that one event will occur approximately every 300 years.

There are no landslides or any other seismic hazards located on or adjacent to the project site.

The geologic formations of the site provide good construction foundation characteristics. However, the two on-site surficial deposits could potentially impact the proposed development. The alluvium materials located in the central drainage course are loose and unstable. Removal of this loose alluvium material could be difficult due to the potential of




FAULTLINES IN THE VICINITY

Figure 7

encountering groundwater. The topsoils contain expansive clays and could cause structure damage to the proposed development. Due to the proposed grading, the soils will be exposed to an increase in the probability of wind and water erosion and downstream sedimentation of watercourses.

Mitigation Measures

No seismic hazards are known to exist on the site and it is the opinion of Geocon Incorporated that the seismic design criteria established in the Uniform Building Code are adequate to safeguard the project dwellings from seismic risk.

All proposed cut and fill slopes in the project will be at 2.0 horizontal to 1.0 vertical inclinations, which offers more stability than the typical 1.5:1.0 slopes. The loose alluvium soils should be excavated and recompacted prior to any filling. Expansive topsoils should not be placed within the upper two feet of the building pads.

Qualified geotechnical personnel should supervise grading operations and conduct field inspections so that any soils or geologic conditions which differ from those thought to be representative of the site can be suitably analyzed and corrective actions taken. An additional geologic report should be prepared based on the final grading plan and submitted for City approval.

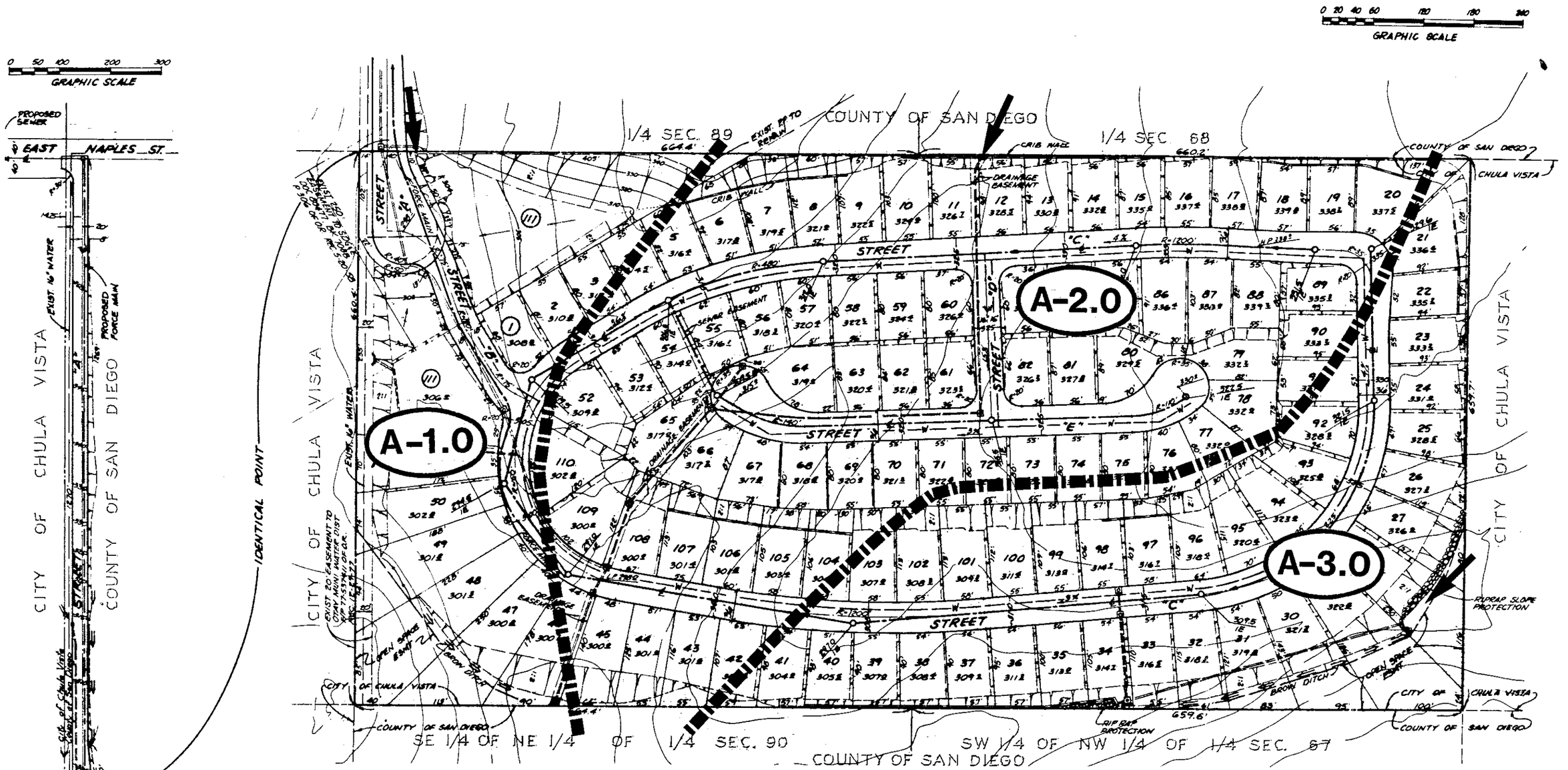
Analysis of Significance

The impact of seismic activity is expected to be similar to that which would be experienced throughout the San Diego Metropolitan area. Incorporation of the specified mitigation measures will mitigate any possible adverse effects. No unusual soils conditions exist which cannot be mitigated by the incorporation of the above suggested measures.

## 3.3 **Drainage**

Project Setting

The drainage basins of Chula Vista were mapped in a 1964 study prepared by Lawrence, Fogg, Florer and Smith commonly known as the "Fogg Report". The proposed Chula Vista Woods subdivision lies within three major sub-basins as defined by this study. These three sub-basins, A-1.0, A-2.0, and A-3.0 which are shown on Figure 8, lie within the larger Palm Road Basin. Intermittent drainage occurs in all three of these water courses. Drainage flows primarily from north to south.




Major Drainage Sub-basin

Flow

source: Fogg Report, 1964

ON-SITE DRAINAGE

Figure 8

Basin A-1.0 is a 46-acre basin that ranges from an outlet elevation of 270 feet above mean sea level (AMSL) to a high of 365 feet AMSL. The 50-year storm runoff for this basin as listed in the Fogg Report is 88 cubic feet per second (cfs). Drainage from this basin enters the site near the northwest corner.

Basin A-2.0 is a 23-acre basin that ranges from an outlet elevation of 270 feet AMSL to a high of 355 feet AMSL. Drainage from this basin enters the subdivision near the north central boundary with a 47 c.f.s. runoff rate for the 50-year storm.

Basin A-3.0 enters the site near the southeastern corner. This is a 66-acre basin with elevations ranging from 270 feet AMSL to 462 feet AMSL. The Fogg Report lists the runoff from this basin as 119 c.f.s. for the 50-year storm. As shown in the following table, the total existing c.f.s. from the project site is 38.9 cfs.

Table 2.
Summary of Existing Hydrologic Conditions

| Basin designation | Area of total basin | Portion of basin within subject property | c.f.s. from project site |
|---|---|---|---|
| A-1.0 | 46 ac. | 4.4 ac. | 8.4 cfs |
| A-2.0 | 23 ac. | 9.6 ac. | 19.6 cfs |
| A-3.0 | 66 ac. | 6.1 ac. | 10.9 cfs |
| Total | | 20.1 ac. | 38.9 cfs |

## Potential Impacts

The proposed project site lies beyond the eastern edge of Chula Vista's developed properties in an area without nearby downstream drainage facilities. Without an improved drainage system to connect into, the proposed development will be responsible for collecting all drainage running onto the site. This includes drainage from basins A-1.0, A-2.0, and A-3.0 and all runoff generated on-site and depositing the total runoff in the natural drainage course as it exits the property. Using standard engineering formulas and the City's Drainage Manual, the total cfs which would be generated by the proposed development was computed to be 44.7 cfs, or an increase of 5.8 cfs (15%) over the existing runoff (see Appendix B for runoff computation). This will result in a slight but manageable change in the volume of flows. Therefore, the quantity of runoff associated with the proposed project will not be a major

environmental concern. The drainage basins are not large and the corresponding runoff quantities are not unmanageable. Rip-rap will aid in dissipating the runoff as it exits the property.

Mitigation Measures

Conventional methods of storm drain design should be more than adequate to convey the runoff and provide all necessary energy dissipation. A properly designed and constructed system will prevent downstream flooding and erosion. As shown on the tentative map, drainage pipes (located within the specified drainage easements) will collect the runoff which generally will flow from the northern end of the property to the southern end. Riprap, located at several points along the southern boundary, will aid in dissipating water into existing channels. Brow ditches also will be used to direct runoff to the appropriate drainages. All plans for the required storm drain system will be reviewed and approved by the City Engineer at the time of submission of the grading and improvement plans.

Analysis of Significance

Incorporation of the above mitigation measures will mitigate any impacts pertaining to drainage.

## 3.4 **Landform**

Project Setting

The 20-acre project site consists of three major south to southeasterly draining canyons separated by relatively broad ridges. Elevations on-site range from 275 feet msl at the bottom of a canyon near the southwest property corner, to 350 feet msl near the northeastern corner of the property. (Geocon, 1977).

Several prominent landforms are found in relatively close proximity to the site and are clearly visible from the site. Mount Miguel lies several miles to the northeast; Rock Mountain and the San Ysidro Mountains can be seen in the distance to the southeast.

A slope analysis of the site showed that approximately 6.6 acres (33%) are in the 0-10 percent slope category, 8.2 acres (41%) in the 10-20 percent slope category and 5.2 acres (26%) have slopes in excess of 20 percent.

Views from the site are primarily to the east (to the above-mentioned mountains), and to the south where development is occurring. Existing residential, the Greg Rogers school and a sloping hill leading to the park are seen from the site looking north and west.

## Impact Analysis

As shown on the Tentative Map (Figure 3), most of the site will be altered in preparation for the proposed development. The only areas to remain in a natural state would be the southeast and southwest corners. Grading on the site will require movement of approximately 140,000 cubic yards of earth in a balanced cut and fill operation. The highest cut slope would be 40 feet in height located near the entry to the project (near Lot 111) in the northwestern corner. The highest fill slope would be approximately 20 feet, found in the southwestern portion of the property. Several crib walls will be built, the highest of which will be about 12 feet, located behind Lots 5, 6, 7, 8, and 9. Slope gradients will not exceed a 2:1 horizontal to vertical ratio.

A conceptual landscape plan has been designed which will incorporate plantings on all of the cut and fill slopes, as well as along the streets. Erosion control groundcover and/or shrubs also will be utilized on the created slopes. As previously discussed in Chapter 3.3, Drainage, no significant impacts are expected to occur in terms of increased runoff from the project caused by the proposed alteration of the property.

Views from the site to the east and southeast basically will remain unchanged. While the view from the park to the site will change from that of being undeveloped open space to that of a developed subdivision, this change is not considered a significant impact. Another visual effect which may occur is that of junk vehicles being stored in the RV storage lot. Mitigation is available, as discussed below, which will address this potential concern

## Mitigation Measures

All grading activities will be carried out in accordance with the grading guidelines and regulations of the City of Chula Vista. In addition, a landscape plan will be implemented which will allow the landform alterations to blend in with the natural landscape.

Through precise plan review and CC&R's for the subdivision, a requirement for landscape screening will be included and a limitation as to the types of vehicles eligible for storage will be addressed. Inoperable vehicles will not be allowed to collect in the RV storage area, as provided in Chula Vista Munilcipal Code 19.58.260.

## Analysis of Significance

Any project design for this property would necessitate grading which would alter the existing landform. These alterations, especially in terms of aesthetic impacts, can be minimized by adherance to grading regulations and implementation of a sensitive landscape plan.

## 3.5 **Biological Resources**

### Project Setting

The property was surveyed first in 1977 by Pacific Southwest Biological Services (PSBS), and documented by a report entitled "Report of a Biological Survey of the proposed Chula Vista Woods Project". That report has been updated by a biological reconnaissance performed by Wier Biological in April, 1984. The information presented below is a compilation of the two reports, both of which are reproduced in the appendix. As shown on Figures 9 and 10, and described in the sections to follow, several sensitive plant species are found on-site, primarily in the western portion of the property. The site is heavily vegetated by evergreen and deciduous shrubs; a maze of trails has somewhat disturbed the natural vegetation.

### Habitat Quality

The property supports primarily Inland Sage Scrub cover, especially on its upper portions. The Scrub is well developed with intermittent stands of Lemonadeberry. This provides a dense and diverse vegetation cover of relatively high habitat quality for several species of birds. Gullies found in the northwest and southern portions of the property are completely dominated by mature stands of Lemonadeberry and a few other forage trees. This habitat affords excellent nesting, foraging and roosting sites. The available water draining off the adjacent park, combined with heavy vegetation in the gullies, supports a relatively large and diverse population of birds and small mammals and also tends to attract migrant birds and additional resident species from surrounding areas.

Several dirt roads intersect the property; these roads have resulted in the destruction of several acres of plant cover with dust and erosion problems remaining.

### Botany

Plant cover on the property is characterized by the term Inland Sage Scrub. This community occurs in its more typical form on the more level, upper portions of the property and is composed of Artemisia californica (Coastal Sagebrush), Eriogonum fasciculatum (Flattop Buckwheat) and Viguiera laciniata (San Diego Sunflower). On slopes and lower portions, a woodland of Rhus integrifolia (Lemonadeberry) occurs. These shrubs reach up to 4 meters tall, with trunks exceeding 2 decimeters in diameter. A large swath of Opuntia prolifera (Coast Cholla) and Lemonadeberry occurs on the exposed slope of the southern drainage. The drainage adjacent to the park has a few Salix (Willow) and Sambucus (Elderberry) trees but, otherwise, is not riparian in its vegetation cover. Minor dumping has occurred in this area.

Although floral diversity is relatively low, several plant taxa are present which reach their northern distributional limit in San Diego County. These northern limitaries (Beauchamp 1972) include Cordylanthus orcuttianus (Orcutt's Bird's Beak), Viguiera laciniata (San Diego Sunflower), Ferocactus viridescens (Coast Barrel Cactus), Ambrosia pumila (San Diego Ambrosia), Ambrosia chenopodifolia (San Diego Bur-Sage), and Selaginella cinerascens (Mesa Clubmoss). The property has large populations of several of these taxa, and based on past field work in the vicinity as well as upon published distributional data, the property represents the northern limit of Cordylanthus orcuttianus and Ambrosia chenopodiifolia. The latter species is represented on the property by a single shrub. Although the Cordylanthus orcuttianus was not found to be as widespread when surveyed most recently as compared to the 1977 report, the difference could be due in part to the early season in which the survey was conducted (the plant is an annual which blooms in mid-summer) as well as this season's abnormally low rainfall.

In summary, the site supports significant stands of several plant species which are of very limited distribution in San Diego County. The most significant of these are San Diego Ambrosia (Ambrosia pumila) and Orcutt's Bird's Beak (Cordylanthus orcuttianus). The table below lists the current sensitivity status of the plants which were recorded for the site in 1977, and which were relocated in 1984.

Table 3.
Sensitive Plant Species

| Species | Sensitivity Status |
|---|---|
| Ambrosia chenopodifolia (San Diego Bur-Sage) | CNPS 2-2-1-1 |
| Ambrosia pumila (San Diego Ambrosia) | CNPS 2-2-2-2<br>USFWS Cat. 1 |
| Cordylanthus orcuttianus (Orcutt's Bird's Beak) | CNPS 3-3-1-1<br>USFWS Cat. 1 |
| Ferocactus viridescens (Coast Barrel Cactus) | CNPS 1-2-2-1<br>USFWS Cat. 1 |
| Selaginella cinerascens (Mesa Clubmoss) | CNPS 1-2-1-1 |
| Viguiera laciniata (San Diego Sunflower) | CNPS 1-2-1-1 |

San Diego Ambrosia and Snake Cholla (Opuntia parryi var. serpentia) are considered "Rare and Endangered" by the California Native Plant Society (CNPS), and Category 1 species with the U.S. Fish and Wildlife Service. The "Category 1" Fish and Wildlife Service designation essentially represents candidate "Endangered" or "Threatened" status.

0 50 100 200 300
GRAPHIC SCALE

0 20 40 60 120 180 240
GRAPHIC SCALE

PROPOSED SEWER
EAST NAPLES ST.
EXIST. 16" WATER
PROPOSED FORCE MAIN
CITY OF CHULA VISTA
COUNTY OF SAN DIEGO
STREET
"A"
"B"
"C"
"D"
"E"
IDENTICAL POINT
City of Chula Vista
County of San Diego
1/4 SEC. 89
COUNTY OF SAN DIEGO
1/4 SEC. 68
CRIB WALL
DRAINAGE EASEMENT
SEWER EASEMENT
EXIST. 8" TO REMAIN
EXIST. 20' EASEMENT TO CITY MINI WATER POST
RIPRAP SLOPE PROTECTION
SE 1/4 OF NE 1/4 OF 1/4 SEC. 90
SW 1/4 OF NW 1/4 OF 1/4 SEC. 67

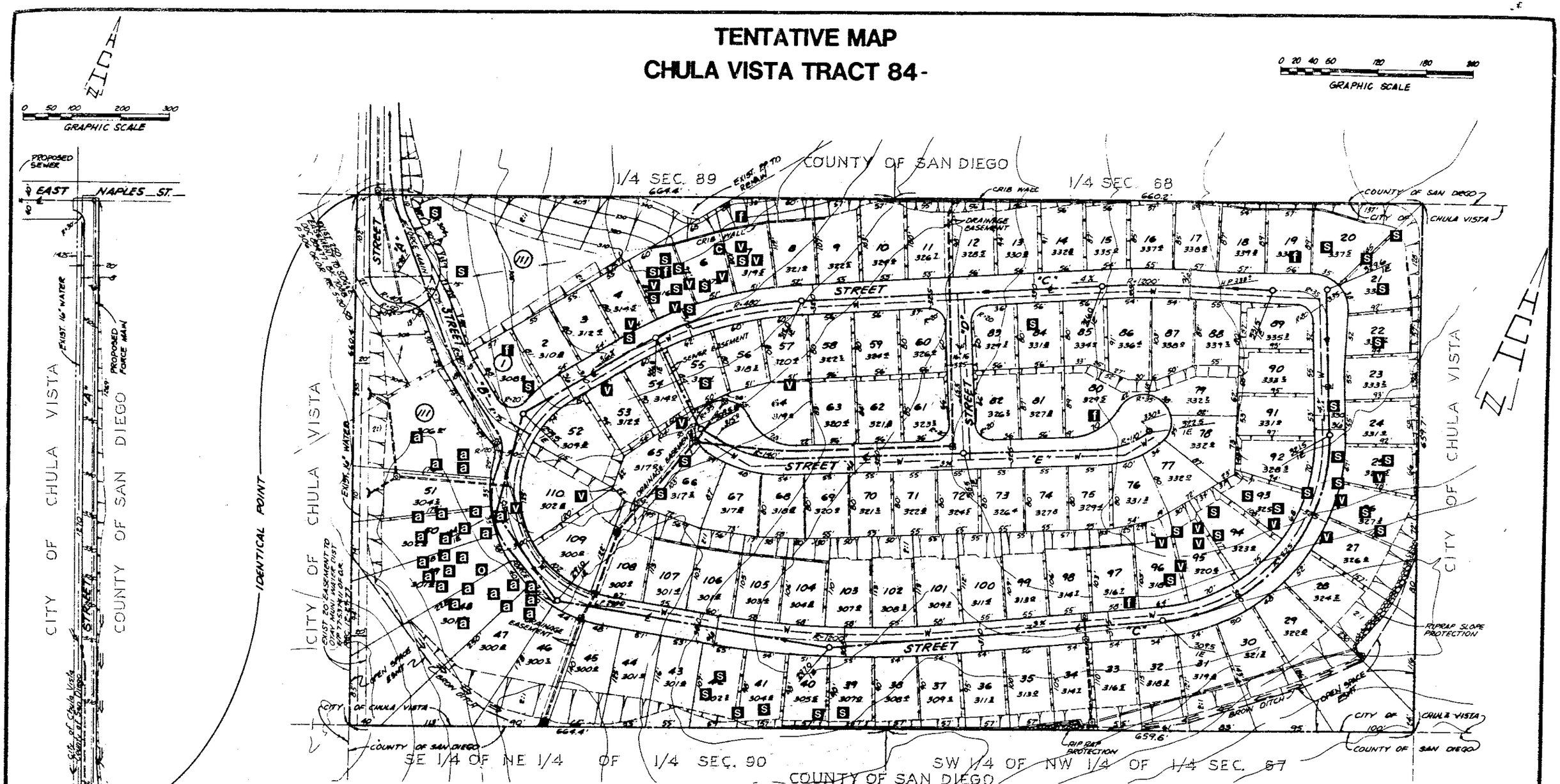
Coastal Sage Scrub
Coastal Sage Scrub dominated by Rhus integrifolia (lemonade berry)
Sandy Drainage
Disturbed

source: Wier Biological

# VEGETATION

Figure 9

# TENTATIVE MAP
# CHULA VISTA TRACT 84-




- c Ambrosia cheropodifolia (San Diego bur sage)
- f Ferocactus viridescens (San Diego barrel cactus)
- s Selaginella cinerascens (pygmy spike moss)
- v Viquiera laciniata (San Diego Co. Viquiera)
- a Ambrosia pumila (San Diego Ambrosia)
- o Cordylanthus orcuttianus (Orcutt's Bird's Beak)

source: Wier Biological

SENSITIVE PLANTS

Figure 10

## Zoology

As mentioned earlier, the site supports a relatively large and diverse population of birds and small mammals due to the available water draining from the park and the heavy vegetation in the gullies. However, no highly sensitive animal species are expected to breed or reside on the site. The potential occurrence of Black-tailed Gnatcatcher and Cactus Wren was sufficiently explored, and found to be negative. Certain animal species considered sensitive on a national level, but of relatively low sensitivity in San Diego County, may occur on-site, including the American Kestrel, Loggerhead Shrike and Bewick's Wren. None of these are considered sensitive locally.

## Potential Impacts

As discussed in previous sections and as shown on the Tentative Map (Figure 3), most of the site will be disturbed in preparation for development of the proposed project. As discussed below, several sensitive plant species will be significantly impacted.

San Diego Ambrosia has been recorded from many stations, mostly in southwest San Diego County: Mission Valley, National City, Spring Valley, El Cajon, Santee and north of Lake Hodges. The species is also recorded from Bonsall and the San Luis Rey Valley. However, most of these locations are historic. The species is currently known in San Diego County from only several sites, although it is known from many stations in Baja California Norte (San Diego Natural History Museum Herbarium). The species count on-site is estimated to be between 3,000-5,000 plants and is one of the largest populations of this plant in the County.

Orcutt's Bird's Beak is very rare in San Diego County, but quite common south of the International Border. The San Diego Natural History Museum Herbarium contains only one specimen, collected on Otay Mesa in 1935. The current status of the on-site population is not clearly known, but should be assumed to be of about the same size and extent as described in the 1977 report (about 500 plants). Although only two plants were found during the current survey, this probably does not represent the true size of the population.

Project implementation as designed is expected to eliminate all biological resources on-site, creating significant impacts to populations of the two rare plant species described above, primarily San Diego Ambrosia, and secondarily, to Orcutt's Bird's Beak. Impacts to the other sensitive species are not considered significant due to small populations or lower sensitivity status. Impacts to wildlife habitat are not considered significant due to the absence of sensitive species, and surrounding disturbance and development. Because of the surrounding disturbed area, project development will not have any significant off-site impacts.

## Mitigation Measures

To mitigate significant impacts to rare plant populations, on-site preservation of habitat for these species would be necessary. A preserve must be large enough to maintain self-perpetuating populations of the plants, and must be protected adequately from disturbance both during and after construction. Preservation of habitat includes maintenance of a somewhat natural flow of water into the small floodplain where the plants occur.

As the project is currently designed, mitigation of the destruction of the sensitive plant species cannot be achieved. However, the biologists have identified an area which, if not developed, would adequately mitigate the impacts by preserving 90% of the San Diego Ambrosia population and 50% of the Orcutt's Bird's Beak population. The area, which would take the form of an open space easement to remain in a natural state, essentially includes the westernmost portion of the property, i.e. Lots 47 to 51 and Lot 111, or a total of five residential lots and the recreational area lot.

Consideration was given to replanting the sensitive species. However, attempts have been made in other parts of the County to relocate San Diego Ambrosia; such efforts have been unsuccessful so replanting the species would not be a viable alternative.

Implementing this mitigation would preclude development of several lots; however, the project could be redesigned to achieve the same total number of units, i.e. 110, if other lots were made smaller. In that way, the project would remain financially feasible in terms of providing these units at moderate prices to potential buyers.

## Analysis of Significance

Development of the proposed project as presently designed would create significant impacts to several sensitive plant species, one of which comprises one of the largest populations of that plant in the County. If the mitigation measures as described above are undertaken, and no disturbance occurs to the habitat during construction, the rare plant populations are expected to remain viable indefinitely and potentially significant impacts will be mitigated. Otherwise, impacts to the sensitive biological resources will be significant and not mitigable.

### 3.6 **Archaeology**

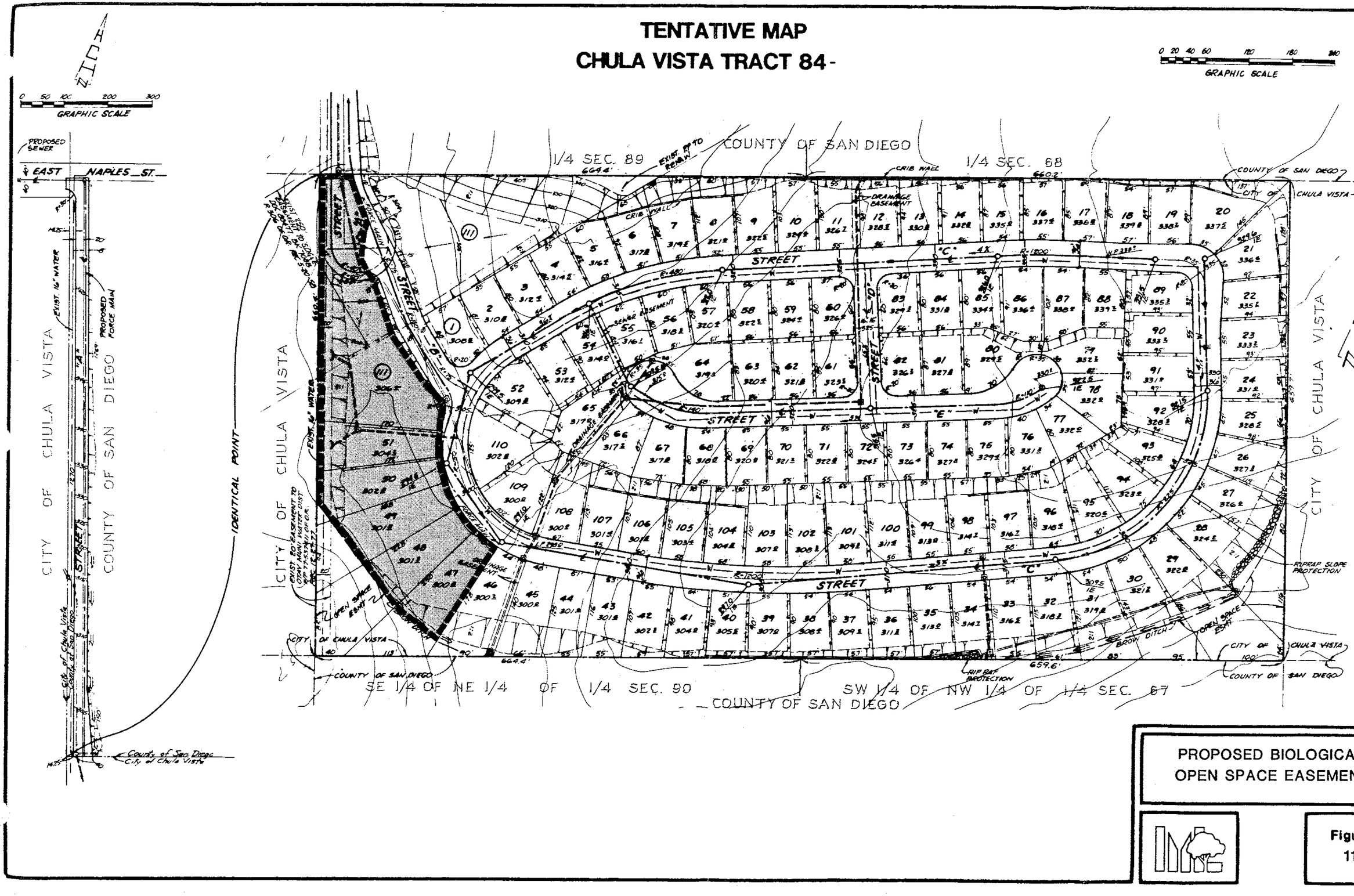
## Project Setting

Archaeological research has been conducted in the project area. There are no known or recorded archaeological sites on the subject property and there are few known or recorded sites

# TENTATIVE MAP
# CHULA VISTA TRACT 84-

0 50 100 200 300
GRAPHIC SCALE

0 20 40 60 120 180 240
GRAPHIC SCALE




PROPOSED BIOLOGICAL OPEN SPACE EASEMENT

Figure 11

within the project vicinity. Due to this lack of resource data, a wide range of environmental factors can be evaluated in aboriginal society's site selection. The availability of water, the presence of lithic resource, specific vegetation forms, certain topographic features and the presence of additional social groups influence decisions for site locations. An examination and evaluation of potential resources located within a particular area can indicate the probability of finding archaeological materials.

On the proposed site, the availability of water is absent even though intermittent creeks exist. There is minimal runoff and precipitation is absorbed rapidly into the arid soil. The presence of fine-grained stones, the preferred medium for the manufacture of stone tools, is absent from the project area. There are light concentrations of quartzitic and meta-volcanic cobbles present but they have never been quarried. A diverse number of plant species exist at the project site, however, it is doubtful that the area would have drawn attention from aboriginal bands since major food sources are absent. Not one of the environmental factors evaluated presented strong evidence of any archaeological findings. Based on research, evaluation and observation there are no known, recorded or observed archaeological resources on-site.

Potential Impacts

No archaeological resources occur on the project site. The proposed project, therefore, will not create any significant archaeological impacts.

Mitigation Measures

No mitigation is proposed since archaeological material is not present.

Analysis of Significance

There are no archaeological resources in the proposed project area and therefore no significant impacts will occur.

## 3.7 **Traffic Circulation**

In March 1984, Federhart and Associates prepared a traffic impact analysis for the proposed Chula Vista Woods project. The Federhart report, of which this is a summary, is included in the appendix of the EIR.

## Project Setting

The project site is located in the vicinity of Oleander Avenue and I-805 to the west, East Naples Street and Telegraph Canyon Road to the north and Brandywine Avenue to the east (see Figure 10). The discussion which follows will focus on impacts which may occur on East Naples Street, Oleander Avenue and Telegraph Canyon Road.

According to City of Chula Vista 1983 traffic counts, East Naples Street west of Oleander Avenue has weekday traffic volume of 3500 average daily trips (ADT). There is almost no traffic on East Naples Street east of Oleander Avenue. It is so minimal that the City has no traffic counts. Oleander Avenue has weekday traffic volume of approximately 6500 ATD near Telegraph Canyon Road. Both East Naples Street and Oleander Avenue are 40 foot curb in the project vicinity. A four-way stop currently exists at their intersection.

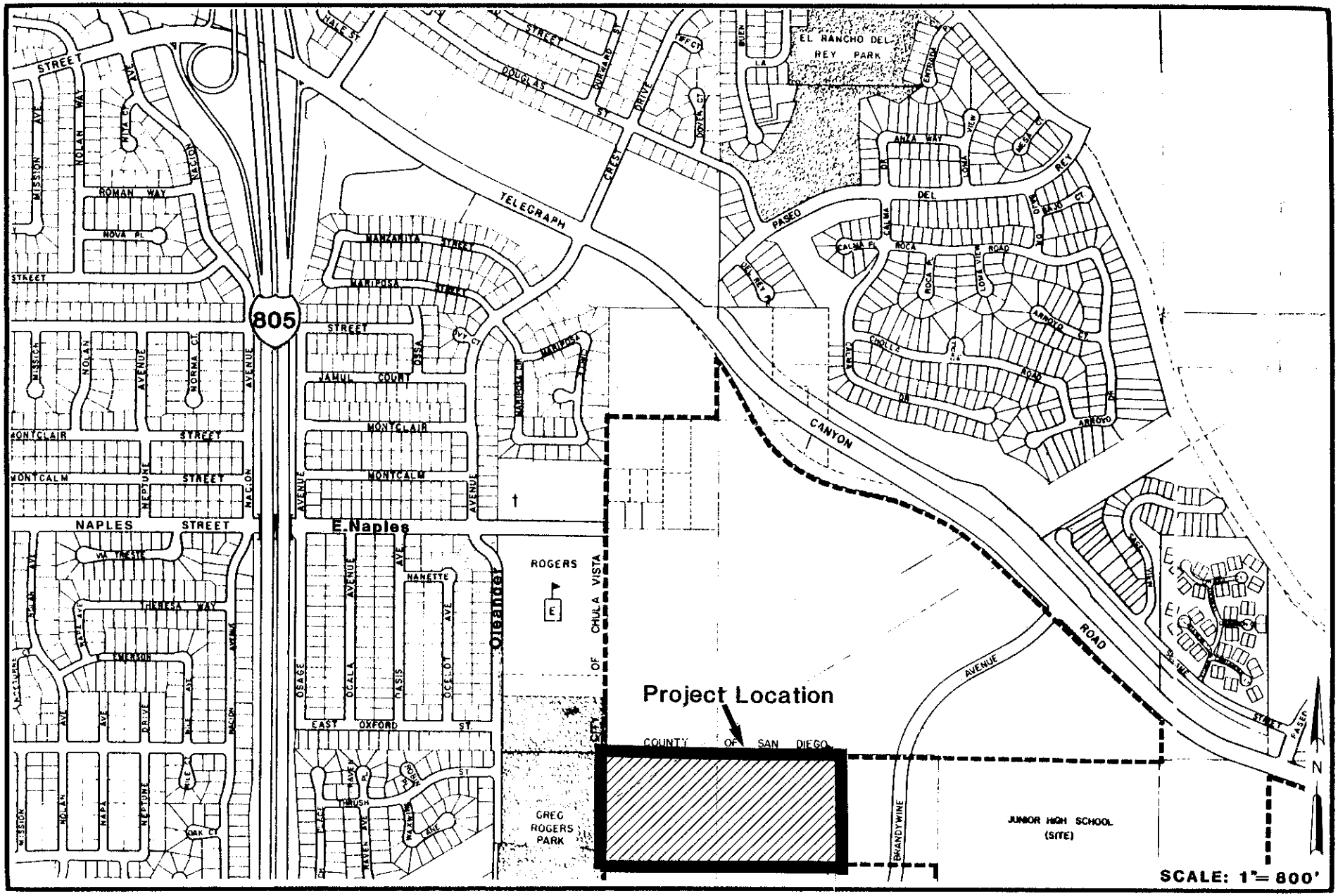
Telegraph Canyon Road, west of Brandywine, has weekday traffic volume of about 16000 ADT vehicles. A signal exists at the intersection of Oleander Avenue and Telegraph Canyon Road. At this location, Telegraph Canyon Road is six lanes wide with a left turn lane. Brandywine Avenue has an weekday traffic volume of 2300 ADT.

To summarize the above discussion, the following table shows traffic volumes on nearby streets in the project vicinity:

Table 4.
Traffic Volumes on Nearby Streets

| Street | ADT |
|---|---|
| East Naples (west of Oleander) | 3,500 |
| East Naples (east of Oleander) | minuscule |
| Oleander (near Telegraph Canyon) | 6,500 |
| Telegraph Canyon | 16,000 |
| Brandywine | 2,300 |

Daily weekday traffic counts were conducted by the City of Chula Vista and by Federhart and Associates at the signalized intersection of Oleander Avenue and Telegraph Canyon Road. During peak traffic periods with the present lane configuration, the traffic counts show the Intersection Capacity Utilization (ICU) as 0.68 which equals a Level of Service (LOS) "B" for the A.M. peak (see Table 5). The P.M. peak reveals an ICU of 0.48 with a LOS of "A". This demonstrates an existing high level of service at this intersection.




CIRCULATION IN THE VICINITY

Figure 12

Table 5.
Level of Service Descriptions

| Level of Service | Traffic Flow Quality |
|---|---|
| A | Low volumes; high speeds; speed not restricted by other vehicles; all signal cycles clear with no vehicles waiting through more than one signal cycle. |
| B | Operating speeds beginning to be affected by other traffic; between one and ten percent of the signal cycles have one or more vehicles which wait through more than one signal cycle during peak hour traffic periods. |
| C | Operating speeds and manuverability closely controlled by other traffic ; between 11 and 30 percent of the signal cycles have one or more vehicles which wait through more than one signal cycle during peak traffic periods. |
| D | Tolerable operating speeds; 31 to 70 percent of the signal cycles have one or more vehicles which wait through more than one signal during peak hour traffic periods; often used as design standard in urban areas. |
| E | Capacity; the maximum traffic volume an intersection can accommodate; restricted speeds; 71 to 100 percent of the signal cycles have one or more vehicles which wait through more than one signal cycle during peak traffic periods. |
| F | Long lines of traffic; unstable flow; stoppages of long duration; traffic volume and traffic speed can drop to zero; traffic volume will be less than the volume which occurs at Level of Service "E". |

| LEVEL OF SERVICE | LOAD FACTOR | VOLUME/CAPACITY RATIO |
|---|---|---|
| A. (free flow) | 0.0 | 0.0 - 0.60 |
| B. (rural design) | 0.0 - 0.1 | 0.61 - 0.70 |
| C. (urban design) | 0.1 - 0.3 | 0.71 - 0.80 |
| D. (maximum urban design) | 0.3 - 0.7 | 0.81 - 0.90 |
| E. (capacity) | 0.7 - 1.0 | 0.91 - 1.00 |
| F. (forced flow) | Not Applicable | 1.01 |

## Potential Impacts

To determine the impact the proposed project has on the existing traffic circulation, it is necessary to estimate the amount of daily and peak hour traffic that will be generated by the project. The following traffic generation rates were determined based on similar housing projects in the San Diego Area and agreed upon by the City of Chula Vista Traffic Engineer:

Table 6.
Project Traffic Generation

110 lots x 10 trips/unit = 1100 ADT

| | Out | In |
|---|---|---|
| A.M. Peak | 77 (7% of ADT) | 22 (2% of ADT) |
| P.M. Peak | 55 (5% of ADT) | 77 (7% of ADT) |

A traffic distribution pattern was developed based on the local San Diego Association of Governments (SANDAG) computer traffic forecasts for the project area. This pattern was approved by the City of Chula Vista Traffic Engineer and was evaluated based on the following time periods:

1. Average daily trips (ADT)
2. A.M. peak hour (7 A.M. to 8 A.M.)
3. P.M. peak hour (4:30 P.M. to 5:30 P.M.)

The greatest impact will occur on Oleander Avenue north of East Naples Street at the Telegraph Canyon Road intersection. Approximately 823 ADT from the project will be added to the existing 6500 ADT. Telegraph Canyon Road between Oleander Avenue and I-805 will be used by approximately 725 ADT from the project. All other existing streets will be utilized by less than 100 ADT from the project.

Based on the above data, a traffic analysis was conducted to determine if the new traffic when added to the existing traffic would warrant the installation of a traffic signal at the intersection of East Naples Street and Oleander Avenue. For a major street such as Oleander Avenue, 8000 or 12000 ADT are required to warrant signalization. Oleander Avenue currently has approximately 5000 or less ADT at East Naples Street plus the 823 project generated ADT will total 5825 ADT. This total is not close to the 8000 or 12000 ADT required to warrant a traffic signal.

Street signalization for a minor street, such as East Naples Street, requires a minimum of 1200 or 2400 ADT. The almost non-existent traffic volume on East Naples Street east of Oleander Avenue added to the 550 ADT from the project will not approach the 1200 to 2400 minimum ADT required. Therefore no traffic signalization is warranted for this four-way stop intersection at East Naples and Oleander.

The Oleander Avenue and Telegraph Canyon Road signalized intersection was also analyzed. At the present time there is a high level of service at this intersection. The ICU and LOS determinations were made for this intersection based on the peak-hour project volumes added to the existing peak-hour volumes. The following table shows the comparison:

Table 7.
ICU and LOS Comparison
Oleander Avenue/Telegraph Canyon Intersection

| Peak Hour | Existing Traffic | | Existing & Project Traffic | |
|---|---|---|---|---|
| | ICU | LOS | ICU | LOS |
| A.M. | .68 | B | .71 | C |
| P.M. | .48 | A | .48 | A |

The increased traffic volume from the proposed project changes the ICU only .03 in the A.M. peak-hour and not at all in the P.M. peak-hour. This impact is considered insignificant since daily, weekly and seasonal traffic variations will affect this intersection more than the proposed project.

New traffic volumes past the East Naples Street side of the school will increase considerably compared to the almost non-existent traffic volumes there now. However, the 1100 new ADT is still well below the over 3000 daily vehicles currently passing the school on Oleander Avenue.

Although there is only one access provided to the site, City staff as well as Fire Department staff conclude that this access is adequate and no significant impacts will be incurred.

## Mitigation Measures

The traffic impact from the proposed project is considered quite minimal and therefore no mitigation measures are required.

## Analysis of Significance

This traffic analysis has shown an insignificant impact on the level of service at Oleander Avenue and Telegraph Canyon Road. The study has also shown that a traffic signal is not warranted at the East Naples Street/Oleander Avenue intersection. The greatest impact on existing streets will be an Oleander Avenue north of East Naples Street where an approximate 10% increase in existing daily traffic is expected.

## 3.8 **Noise**

## Project Setting

A noise analysis was performed to determine the affect of increased traffic from the proposed project on adjacent residents. According to Federhart and Associates, the project's Traffic Engineer, nearly all project generated traffic will use East Naples Street to Oleander Avenue then go north to Telegraph Canyon Road. Telegraph Canyon Road will then provide access to I-805. These three roadways were analyzed to determine existing noise levels in order to accurately evaluate the impact of the proposed project.

The noise analysis of the proposed site was conducted using the widely accepted Wyle Laboratory Methodology. This methodology utilizes the average daily traffic (ADT) and the lane configuration for each road to determine the day/night noise level (Ldn). This methodology was applied to concerned segments of East Naples Street, Oleander Avenue and Telegraph Canyon Road.

East Naples Street, a two-lane 40 foot curb to curb residential collector, is located north of the project site. The road segment of most concern is the portion east of Oleander Avenue. Almost no traffic currently exists east of Oleander Avenue while there is an ADT of approximately 3500 two-way vehicles west of Oleander Avenue. Oleander Avenue, a second road of concern, is a 40-foot curb to curb collector road located west of the proposed project. The most important segment of Oleander Avenue is located between East Naples Street and Telegraph Canyon Road. This segment currently has an ADT of approximately 6500 two-way vehicles. The third road of concern is Telegraph Canyon Road, beween Oleander Avenue and I-805. Telegraph Canyon Road is a six-lane prime arterial with an ADT of 16000 two-way vehicles.

The existing day/night noise level (Ldn) 50 feet away from the roadway's nearest lane was calculated for each of the involved segments of these three roads. The traffic east of Oleander Avenue on East Naples Street, which is almost non-existent, was assumed to have an ADT of 100 two-way vehicles. Using this assumption, the existing Ldn at 50 feet for East Naples Street is 56.4 dB(A).

Oleander Avenue currently has an ADT of 6500 vehicles between East Naples Street and Telegraph Canyon Road, which results in an Ldn at 50 feet of 63.1 dB(A).

Telegraph Canyon Road, with its ADT of 16000 vehicles between Oleander Avenue and I-805, has an Ldn at 50 feet of 70.4 dB(A).

With the exception of Telegraph Canyon Road, both of the other roadways are below the City of Chula Vista noise standard of 65 dB.

## Potential Impacts

To determine the noise impacts of a project, it is necessary to estimate the amount of daily traffic that will be attracted to and from the site. Using information from the Federhart Traffic Report, the following trip generation rates were determined and agreed upon by the City of Chula Vista Traffic Engineer:

110 lots x 10 trips/unit = 1100 ADT

These project generated automobile trips will be added to the concerned segments of East Naples Street, Oleander Avenue and Telegraph Canyon Road.

The entire 1100 daily trips will be added to the segment of East Naples Street east of Oleander Avenue. This will increase the total traffic volume of East Naples Street to 1200 ADT (100 existing ADT + 1100 project ADT = 1200 total ADT). This traffic volume increase will result in a noise level increase from 56.4 dB(A) to 58.0 dB(A). This 1.6 dB(A) increase is insignificant and will not create any added noise impacts to existing residents.

Oleander Avenue will have a daily traffic increase of 823 vehicles from the proposed development. The remaining 277 daily trips of the project-generated 1200 daily trips will be divided between East Naples Street west of Oleander Avenue and Oleander Avenue south of East Naples Street. These traffic increases are considered minimal and will not create any adverse noise impacts. The additional 823 daily trips plus the existing 6500 ADT will result in a total ADT of 7323 two-way vehicles. This project generated traffic increase will result in an increased noise level from 63.1 dB(A) to 64 dB(A). This 0.9 dB(A) noise increase is minimal and will not create any adverse environmental impacts.

The segment of Telegraph Canyon Road between Oleander Avenue and I-805 will carry approximately 725 project generated trips per day. This additional traffic added to the existing daily traffic (16,000 ADT) will result in a total of 16,725 daily vehicles. This increase in traffic volume will result in an increased noise level from 70.4 dB(A) to 71 dB(A). The existing

noise level on Telegraph Canyon Road is already above the City of Chula Vista noise standard of 65 dB. The proposed project will increase this level only 0.6 dB(A). This increase is very insignificant and unnoticeable and is not considered an impact.

Due to the distance of I-805 from the project site, approximately 2000 feet, there will be no traffic noise impacts to project residents from this freeway.

Due to earthmoving required for project construction and the heavy machinery involved, there will be a short-term noise impact. The noise associated with heavy equipment in this type of project would exceed 60 dBA within 1400 feet of their use. This is regarded as an adverse impact. However, in view of the fact that this excavation will be undertaken during daytime working hours, in addition to requiring a relatively short time frame for completion, this impact is not regarded as significant.

There are no other noise sources available to create any adverse noise impacts to the project or to surrounding residents. Therefore, the proposed project will not create or be affected by any significant noise impacts.

Mitigation Measures

There are no adverse noise impacts to the project or to surrounding area residents, therefore no mitigation measures are required.

Analysis of Significance

The project impacts to area noise levels are insignificant.

## 3.9 **Public Services**

Sewer

Project Setting

The proposed property is located within the City of Chula Vista and sewer service will be provided by the City. The current amount of average daily sewage flow through the Metro sewage treatment plant is approximately nine million gallons per day (MGD). In comparison to the 18.2 MGD rights to capacity of the plant, there is an excess of 9.2 MGD. This excess would provide 34,000 Equivalent dwelling units (EDU). The City uses a generation factor in gallons per day of 3.03 persons at 80 gallons per person per day to result in 242 gallons per day. Therefore, the 110 proposed units will generate approximately 26,620 gallons per day.

The project is proposing the installation of a pump station at the northwest corner of the property. This station will pump sewage north to connect to the East Naples Street sewer main.

The Naples Street sewer network has adequate capacity to handle the proposed development, as does the sewage treatment plant. With the inclusion of a pump station and the use of the Naples Street sewer system, the proposed project will have minimal impact on the City's staff, sewer system and treatment plant. Although no increase in existing sewer facilities is required, if an increase was required the developer would finance the increase with subsequent formation of a reimbursement district where those benefitting from expanded facilities would pay their proportionate share.

The project proponent also is examining the possibility of designing a gravity flow system through Greg Rogers Park. At this point, such studies are cursory and preliminary in nature. If at a later date, a gravity flow system is proposed, any environmental impacts determined to be signficant will be addressed in addendum to this EIR.

## Potential Impacts

The installation of a pump station and the use of the Naples Street sewer system is a much less impact than the connection to a gravity system at Oleander Avenue and Redwing Court. The gravity system required the use of the near capacity Main Street sewer network. The proposed design will utilize the adequate capacity of the Naples Street system. In addition, if the sewage capacity of the Naples Street system increased dramatically, the project has the option, because of the pump, to use the Oleander Avenue to Telegraph Canyon Road sewer system. This system is currently well below capacity. Therefore, with the incorporation of the pump station, there will be no significant impacts to the City staff, sewer system or sewage treatment plant.

## Mitigation Measures

The pump station design allows the project the option of selecting the least impacted sewer system in which to connect. The pump station along with the required approval by the City Engineering Department of all sewer plans, will mitigate all significant sewage treatment impacts.

## Analysis of Significance

Due to the mitigative measures proposed by the project, there will be no significant sewage treatment impacts to the City of Chula Vista.

## Fire Protection

### Project Setting

The proposed project lies within the service boundary of the Chula Vista Fire Department. The nearest fire station serving the project area is located at 266 East Oneida Street in Chula Vista. This station is approximately one mile southwest of the subject site, with an estimated response time of between two and three minutes. Two units currently man the service area with a 1976 ISO fire protection class rating for the project area of four. The nearest back-up station is located at 80 East J Street in Chula Vista. Located two miles west of the site, this back-up station has a response time between three and four minutes.

The Chula Vista Fire Department has indicated that their current staff and facilities are adequate to serve the proposed development. The Department provides an adequate response time to the project area and no increases in facilities or manpower are required.

The emergency access of the proposed project has been reviewed by the Chula Vista Fire Marshal and is considered adequate.

### Potential Impacts

The Chula Vista Fire Department has stated that development within their district is not considered to have a significant impact on fire protection services. The addition of 110 residences will not significantly increase the demand of area fire services.

### Mitigation Measures

The proposed project will not significantly impact the current level of service from the Chula Vista Fire Department and will therefore require no mitigative measures.

### Analysis of Significance

The impact to fire service is considered to be insignificant.

## Law Enforcement

### Project Setting

Law enforcement for the project area is serviced by the Chula Vista Police Department (CVPD) located at 276 Fourth Avenue in Chula Vista. The project area is patrolled by three standard shifts with an average of six beats each shift. The

proposed site is situated within Beat 30 and contiguous to Beat 28. The priority and non-priority response times to the project area are five minutes or less and 20 to 25 minutes, respectively. This equals the City-wide average for priority and non-priority response times. The CVPD have proposed increases of one beat (five personnel) and one additional vehicle, fully equipped to increase sagging "patrol time" percentages. There has not been any additional field personnel added to the City Police patrol for seven or eight years. In addition, available patrol time has dropped from the mid-40 percentile to the low-30 percentile. The CVPD is in need of additional personnel regardless of the expansion of the service area. No increase in facilities are anticipated, but any which would be mandated would be financed from the General Fund of the City.

### Potential Impacts

The proposed project would not create such a significant bulge in personnel allocations to justify added resources. However, each such project is cumulative in its load factor to the total work for the Police Department.

The proposed project will not in itself significantly impact the level of service or demand to the CVPD.

### Mitigation Measures

The proposed project site is located in an open area, between a public park and a hospital, that has had some problems with juvenile motorcyclists, illegal parties and as an alien travel-way. The construction phase could be the focus of acts of malicious mischief and vandalism. It is therefore recommended, in order to mitigate construction vandalism, that job site guards remain on-site on a 24-hour basis.

### Analysis of Significance

Incorporation of the above mitigative measures will mitigate any impacts pertaining to law enforcement aspects.

## Water Supply

### Project Setting

The proposed development is located within the Otay Water District (OWD). However, the eastern half of the site is outside Improvement District Number 10 and must be annexed to this improvement district in order to obtain service.

The subdivision lies within the 621 pressure zone. The reservoir for this zone is located approximately one mile east of the intersection of Telegraph Canyon Road and Otay Lakes Road and has a capacity of 12 million gallons. The average per capita water consumption rates currently experienced by the Otay

Water District for high residential housing (above 1 dwelling units/acre) is 650 gallons per dwelling unit per day (650 g/du/day). With the addition of 110 new dwelling units, the increased water demand on OWD will be approximately 71,500 gallons/day. According to OWD, the proposed subdivision will not have any significant impact upon the Districts facilities, capacity or staff.

The project will connect to the water main located on the east side of Greg Rogers Park via a 12" main which also will connect into a line in Brandywine Stret. The remaining on-site facilities will be 8" in size.

### Potential Impacts

According to Otay Water District, the proposed project will not have any significant impact on the District's facilities, capacity or staff.

### Mitigation Measures

The eastern half of the project site will require annexation into OWD Improvement District Number 10, to receive water service. In addition, the installation of the required water mains and connection to existing water facilities are necessary.

### Analysis of Significance

Incorporation of the above mitigative measures will mitigate any impacts pertaining to water servicing of the project site.

## Schools

### Project Setting

Students generated as a result of the proposed project will attend Chula Vista City School District and Sweetwater Union High School District.

New developments within the Chula Vista City School District (Grades K through 6) are not assigned to specific schools, in order to maintain flexibility with problems such as overcrowding, population fluctuation and student integration. The average student household generation factor for elementary schools is 0.5 students per residential unit. The proposed 110 unit project will generate approximately 55 new students. According to the Chula Vista City School District, the proposed project is expected to increase demand on school services in the area. However, with help of assessment fees the School District would be able to adequately accommodate students generated by the project.

The Sweetwater Union High School District will handle project generated students in grades seven through 12. These

students will attend Bonita Vista Junior and Senior High Schools. However, the District Board of Trustees reserves the right to assign students to other schools to alleviate over-crowded conditions, should they exist.

The average student per household generation factor is 0.23 and 0.27 students per unit for junior and senior high school students, respectively. The Sweetwater Union High School District is currently conducting a Master Plan Study which may alter these rates. The proposed project will generate approximately 25 junior high school students and 30 senior high school students.

To accommodate the influx of new students, the Sweetwater Union High School District has established a fee schedule to finance the purchase of new and relocatable buildings. Under the terms of SB-201 and I-43, these fees are assessed at the issuance of residential building permits with provisions for payment established prior to approval of any Tentative Map. The following table includes additional information on the junior and senior high schools. Assessment fees for single family residential units are included in Appendix F.

The Sweetwater Union High School District's plans for construction of future elementary, junior high or senior high schools is dependent upon the buildout of the area east of I-805.

## Potential Impacts

The Chula Vista City School District is currently engaged in an effort to integrate schools and a citizens advisory committee may make recommendations of school assignments. This is also an effort to alleviate overcrowding and population fluctuation problems. The assessment fees and the flexibility of the citizens advisory committee will allow the District to accommodate project generated students without significant impact.

The Sweetwater Union High School District is experiencing overcrowded conditions in some areas. The Board of Trustees considers the District as a whole and if overcrowding exists in some areas, then the Board of Trustes may reassign students from new developments to a school other than the school of residence. The building assessment fees and the decisions of the Board of Trustees will also allow the Sweetwater Union High School District to accommodate new students adequately and without adverse impacts to the existing level of education.

## Mitigation Measures

The assessment of developer fees and the decision and flexibility of the governing committee of the individual school districts will alleviate any potential project generated impacts to these districts.

Table 8.
School Enrollments

| | Bonita Vista Junior High School | Bonita Vista Senior High School | Elementary School (unassigned) |
|---|---|---|---|
| Capacity | 1410 | 1512 | N/A |
| Enrollment | 1287 | 1278 | N/A |
| Projected Fall, 1984-85 Enrollment | 1215 | 1346 | N/A |
| Student Generation Rate | .23 | .27 | .50 |
| Projected Generated Students | 25 | 30 | 55 |
| Bussing Available | yes | yes | yes |

## Analysis of Significance

Incorporation of the above mitigative measures will alleviate any significant impacts involving educational service to existing and future students.

## 4.0 Significant Unavoidable Adverse Impacts

Section 3.0, Environmental Analysis, describes the effects of the proposed project. The unavoidable impacts described below are summarized from the previous sections. The relative significance of each impact will depend, in part, on the mitigation measures ultimately incorporated into the implementation of the proposed project. Unavoidable impacts include the following:

- The existing open space within the 20-acre development area will be permanently displaced in favor of the proposed urban uses.
- The proposed project could conflict with the operations of the San Diego Gas & Electric Company's facilities.
- The proposed project and subsequent grading operations will result in permanent alterations to the existing natural terrain.
- Groundshaking could occur from seismic activity along one of the active fault zones in the region.
- Removal of vegetation during grading activities will expose underlying soils to increased potential for erosion by wind and water.
- Development will result in increased storm water flows.
- Development as proposed will eliminate the rare and endangered species of San Diego Ambrosia and Orcutt's Bird's Beak.
- Construction activities will increase noise levels on a short-term basis, and result in a short-term visual impact.
- The proposed project will create a demand of approximately 71,150 gallons of water per day and will generate approximately 26,620 gallons of wastewater per day.
- Approximately 110 students will be generated by the proposed project.

## 5.0 Alternatives to the Proposed Project

This section addresses alternatives to the project to assist decisionmakers and the general public in their evaluation of the proposed development. Alternatives discussed below are those which may reduce environmental impacts and are considered feasible courses of action. Four alternatives are analyzed below: no project, reduced project, development under current land use designations, and development which utilizes an alternate point of access.

### A. No Project

Under the No Project alternative, the proposed manufactured housing subdivision would not be built. The project site would be left in its present, relatively undisturbed state. However, the potential for future development under the current land use designations; Open Space/Parks and Medium Density Residential (4-12 Du/ac) would remain.

#### Summary of Effects

The existing landform of the property would be unaffected, thereby eliminating grading and aesthetic impacts. Sewer and water facility improvements would not be required and public service agencies would also not experience additional demands for services. In fact, the no project alternative would, essentially, eliminate all impacts discussed in this report. The no project alternative, however, would not provide low and moderate income housing. The property for the short term would, most likely, remain in its current undeveloped use. Over the long-term, it would most likely be developed for medium density residential uses.

### B. Reduced Project

A project which reduces the number of units proposed, with the intent of reducing primary impacts would involve the elimination of particular units. Specifically, this alternative would address a plan similar to the one previously approved for 54 units. This alternative would be developed under the Hillside Modifying District guidelines, reserving a 7-acre area near Greg Rogers Park as open space.

#### Summary of Effects

Landform alteration and biological impacts could be reduced with this alternative; however, the basic effect on the undeveloped character of the property in conjuction with the area to the north, east, and south resulting from the density and type of homes proposed, would remain the same. In addition, the need for the extension of public services would be the same.

The exclusion of units from the western side of the property near the park would reduce if not eliminate the biological impacts to several sensitive plant species, particularly San Diego Ambrosia, which grow in the sandy drainage in that area. Additional natural open space would be preserved with this alternative. Obviously, fewer traffic trips would be generated by a reduction of units.

The Reduced Project alternative may not be economically feasible to the project proponent in terms of providing affordable housing to low and moderate income buyers. However, the primary environmental effects from the proposed project could be reduced with this alternative.

C. Development Under Current Land Use Designations

Implementation of this alternative would result in the development of the property under the current land use designations, including Medium Residential (4-12 Du/ac) and Open Space/Parks. This would allow the development of between 40-120 dwelling units on the eastern 10 acres of the site. The western 10 acres could remain in a natural state or be developed with parks uses in conjunction with Greg Rogers Community Park.

Summary of Effects

The amount of land actually disturbed and the quantity of grading required for the construction of the 120 residences are difficult to estimate, but would occur over a smaller land area than the proposed project. However, if a project were developed with the objective of achieving a comparable dwelling unit count as the proposed project, i.e., 100 units, such a project probably would have to use a multi-story design, which may create aesthetic impacts and land use compatibility impacts. If these impacts could be mitigated, affordable housing still might be feasible. If 40 conventional single family homes were built, no incompatibilities would be created, but the product would undoubtedly cost more than the proposed units which are predicted to sell for about $70-80,000.

As with the previous alternative, biological impacts could be reduced; however, this would be dependent on the type of activities that would occur on the western 10 acres if it were to be part of the park. Depending on the actual density, traffic generated could be similar to the proposed project; access may be more feasible to the east, rather than the north causing different impacts to occur if Brandywine were used instead of East Naples.

D. Alternate Points of Access with Same Density Project

This alternative would allow 110 residential units to be developed on the property but access would not be taken from the north. The most logical alternative access would be to the east, since Brandywine Avenue lies 400 feet from the eastern

project boundary, and ties more directly into Telegraph Canyon Road. Currently there are no roads to connect with to the south, although Palomar Street eventually will hook into Brandywine. Nonetheless, access to the south is not desirable due to less convenient freeway acess.

## Summary of Effects

This alternative would alleviate the approximately 850 vehicle trips through the existing East Naples Street/Oleander Avenue neighborhood. However, the proposed project is not expected to significantly impact those streets. A traffic analysis would be necessary if access were taken onto Brandywine, especially as the eastern portion of the City develops. Finally, this alternative will not be feasible as long as the project proponent does not have the option to obtain right-of-way or purchase property necessary to implement an eastern access.

## 6.0 The Relationship Between Local Short-term Uses of Man's Environment and the Maintenance and Enhancement of Long-term Productivity

Approval of the project would allow a more intense use than is presently allowed. Short-term use of the property as open space appears limited as this portion of the city develops. Though this project represents a long-term commitment to urbanization and population support systems, the precendent for the site's development is established in the City's General Plan Land Use Element, with designations of Medium Residential for half of the site as well as the area surrounding the site.

The site promotes two long-term productive uses: residential uses of the property will accommodate housing needs for San Diego's growing population; and over the long-term, the proposed project will produce greater economic return to the City than the currrent land use designations would allow. The proposed project serves an additional productive use in that it will increase affordable housing opportunities which are unlikely to be converted to alternative uses. Affordable housing is in short supply in the County and will continue to be so in the future.

## 7.0 Irreversible Environmental Changes

Approval of the proposed project will allow urbanization of the project site. Grading will be necessary to provide pads and access roads to serve the project, producing a definite land form modification. The proposed project would ultimately cause long-term modifications of the aesthetic characteristics of the site, resulting in a transition to a more urbanized setting.

In addition, the transformation of the undeveloped property to a residential subdivision would essentially result in an irreversible commitment of land, which will also result in an irreversible commitment of energy supplies and other resources connected with site development and operations. Buildout of the proposed development represents a long-term commitment for a variety of resources. Resultant consumption of fossil fuels would incrementally reduce existing supplies of fuel oil, natural gas, and gasoline. These increased energy demands relate to project construction, lighting, heating and cooling of residences, and transportation of people to and from the site.

Project construction will require commitment of additional natural resources, including lumber and other forest products, sand and gravel, asphalt, petrochemicals, and other construction materials. Increased commitments of public services and utilities (sewer and water) would also be required, establishing increased demand for such services throughout the life of the proposed project.

Development of the proposed project also represents a long-term loss of an open space resource, incrementally adding to areawide losses of such resources. As noted in the biology chapter, several sensitive plant species are found on-site.

## 8.0 Growth Inducing Impacts

Growth inducement is an issue directly related to the extension of public services and establishment of new land uses which could encourage additional development. In this report, growth is not assumed to be necessarily beneficial, detrimental or of little significance to the environment, but is examined objectively as it relates to this project.

In general, factors associated with residential developments which promote growth are related to the extension of public services or access into an area where they previously were not available, and the potential for development on land surrounding the project. Implementation of the proposed project will not directly induce growth in the surrounding area. All supporting services (i.e. water, sewer, fire, police, schools) and access are currently nearby and available to the site. As mentioned earlier, the land to the north, east, and south is held by one ownership and Chula Vista Woods will not necessarily encourage or preclude development there since services and access are available to that land as readily if not more so than to the project site.

Development is occuring further east along Telegraph Canyon Road as well as to the south. Nearby shopping facilities, schools, parks, and access to major freeways are in place to handle the future development in the eastern portion of the City. It is, of course, recognized that the project will add incrementally to the population base of Chula Vista.

## 9.0 Organizations, Persons Consulted & References

City of Chula Vista
- Engineering Department - Don Dackins
- Planning Department - Doug Reid

HCH and Associates - Tony Ambrose
- John Moy

Chula Vista Elementary School District

Sweetwater Union High School District

Otay Municipal Water District

Final Environmental Impact Report and Appendices (EIR 78-3) for Chula Vista Woods

City of Chula Vista General Plan
- Land Use Element
- Parks and Recreation Element
- Noise Element

## 10.0 Certifications

This Draft Environmental Impact Report presents a full disclosure and independent analysis of all the identified environmental effects as required by the City of ~~Chula~~ Vista and the California Environmental Quality Act.

Nancy E Rollman
Project Manager

Brian F. Mooney
Principal Consultant

This report was prepared by Mooney-Lettieri and Associates, Inc. of San Diego, California. Members of the Corporate staff contributing to this report are listed below.

| | |
|---|---|
| Brian Farrell Mooney | Principal Consultant |
| Nancy E. Rollman | Project Manager |
| Ray Hrenko | Assistant Planner |
| Rose J. Griscom | Cartographer |
| Charlotte Willits | Assistant Cartographer |
| Marilyn Bodhaine | Production Specialist |

Associated consultants contributing to this report include:

| | |
|---|---|
| Federhart & Associates | Traffic Circulation |
| Hay Engineering, Inc. | Hydrology |
| Wier Biological | Biology |

## 11.0 Public comments and Responses

This chapter contains the comments and the responses to the comments received during the public review period of May 10, 1984 to July 25, 1984 as well as public testimony taken at a Planning Commission hearing held on July 25, on the Chula Vista Woods Draft Environmental Impact Report (SCH 84021505). All comments received from the City of Chula Vista staff and other reviewing parties are discussed herein. This chapter, along with the preceding ten chapters, constitutes the Final Environmental Impact Report.

The following persons, organizations and agencies commented in writing upon the Draft EIR:

1. Harry K. Griffin, Chairman, Resource Conservation Commission (May 29, 1984)

2. R. Mitchel Beauchamp (May 29, 1984)

3. Roger Daoust, City of Chula Vista Engineering Department (May 30, 1984)

4. San Diego Gas and Electric (June 19, 1984)

5. United Enterprises, Inc. (June 27, 1984)

6. United Enterprises, Inc. (July 25, 1984)

The comments and responses are presented in the same order as listed above. Each letter has been reproduced with the comments numbered consecutively. The responses are found opposite the numbered comment. Appropriate changes have been made to the EIR text in response to comments as noted in this chapter.

The following persons commented verbally at the Planning Commission hearing:

1. Commissioner Green

2. Commissioner Guiles

3. Tony Ambrose, HCH & Associates

Responses to these comments comprise the final portion of this chapter.

May 29, 1984

TO: Duane E. Bazzel, Assistant Planner

FROM: Harry K. Griffin, Chairman, Resource Conservation Commission

In reponse to your communication of May 10, 1984, regarding the draft Environmental Impact Report on the proposed Chula Vista Woods Subdivision, EIR-84-6, the following comments are submitted. Please note that these are my individual comments and are not necessarily those of the Resource Conservation Commission since the EIR was not received in time for consideration at a scheduled Commission meeting.

1. General

1 The EIR is inadequate in that it fails to give due consideration to the future development of adjacent properties. Evaluation of various environmental impacts have only considered this project in isolation rather than as the initial development in a much larger area similarly planned for residential use.

2. Biological Impacts

2 The classification of certain species of wild plants as "endangered" appears to be a local phenomenon since such plants are "quite common" elsewhere. Also, experience shows that new residential areas, within a few years of development, again support a wide variety of flora and fauna, thus the impacts are largely temporary rather than permanent.

3. Traffic Circulation

3 This is the prime example of inadequate evaluation of development in the project vicinity. The use of Oleander Avenue as principal access to Telegraph Canyon Road and I-805 may be satisfactory for this project alone, but development of the area north and east of the project at similar density might soon overload Oleander Avenue between East Naples and Telegraph Canyon Road. This section of Oleander Avenue is winding, hilly and purely residential and its use as a collector road at increased levels would seriously impact on adjacent properties.





**1** Comment noted. This statement refers to cumulative impacts. CEQA Section 15130 (a) states that cumulative impacts shall be addressed when they are significant; the significant impact of this project relates to biological resources, which is discussed in terms of cumulative impacts. Traffic, land use, public services, etc... are not significant impacts; therefore, it is not the responsibility of this project to consider the impacts of a larger area. When the larger area is proposed for development, the City will then examine the impacts from that development.

**2** Comment noted. This comment does not appear to address the adequacy of the EIR. In addition to the Biology chapter, the significance of several plant species found on this site has been confirmed by the studies of two biologists done several years apart. The reader is also referred to this Response to Comments chapter for additional discussion of the importance of providing adequate mitigation for these plants (see letter from R. Mitchel Beauchamp to John Moy).

**3** Comment noted. This General Plan Amendment would change the land use designation of open space on one-half of the project site to the medium residential. Thus, it is acknowledged that this project would add approximately 550 unanticipated trips to the surrounding street system. However, not all of these trips will use Oleander between E. Naples and Telegraph Canyon Road, i.e. some will be distributed onto E. Naples alone and onto Oleander south of E. Naples. The increase of 550 trips

Further, the existence of the SDG&E easement with installed transmission lines creates the possibility of complete blockage of the single access road. The suggestion for an emergency access to the project area from Brandywine Avenue is a minimal but inadequate solution. A permanent road from the east end of the project to Brandywine Avenue should be required.

4. Landform

4 The effect of the proposed extensive landform changes with respect to probable development of adjacent properties should be considered in the EIR. The initial developer in this area should not be allowed to restrict or adversely affect developers of adjacent properties.

Harry K. Griffin



is incremental and not considered significant to the service capacity of these streets. When the area to the north and east develop, the appropriate access points will be determined by the City.

Various city departments (Engineering, Fire, Planning) have determined that one access for a development of this size is adequate. Also, based on information submitted to the City during this public review period, it appears that statistically there is a very remote chance of a transmission line causing blockage of the access road (see comments submitted by United Enterprises, Inc.)

4 Comment noted. The project as proposed will not restrict or adversely affect future development in terms of land form changes. Conservative slope gradients have been designed, created slopes will be revegetated and application of City grading standards will prohibit adverse impacts to surrounding properties.

Mr. John Moy
HCH & Associates
4877 Viewridge Avenue
San Diego, CA 92123-1667

29 May 1984

Dear John,

I examined the Chula Vista Woods project on 22 May. A fire had occurred in the northern portion of the site, apparently eliminating the single shrub of **Ambrosia chenopodiifolia.**

The western alluvial area, where the **Ambrosia pumila** occurs, is in a much more deteriorated condition than I recall from my 1977 site survey. Many more trails cross there and in other portions of the site. More non-native vegetation now occurs in this western area also.

5 The **Ambrosia pumila** population does occur to the north and south of the project site, with about 60% of the population on the project site. As stated in our 1977 report, it is still my opinion that the population is hybrid in origin. The parential stock appears to be **A. pumila** and **A. psilostachya** var. **californica.** This is not discussed in the EIR.

**Ambrosia pumila** is known from the following locations in California: Devenberg property, Bonsall; South of Junipero Serra Road at Padre Dam; State Highway 125 reserved right-of-way in Spring Valley; three populations at the South Bay Plaza in National City; an open space site on a residential development now under construction along Spring Valley Creek Gorge; a ridge along the 230Kv line north of Telegraph Canyon; and the Chula Vista Woods population.

Because of the habit of the plant to persist in disturbed areas, I would speculate that additional sites still remain in the Bostonia and Santee areas. In most cases, the plants occur in alluvial soils.

The **Dicranostegia orcuttiana** (Cordylanthus o.) population on-site seems to have diminished since my 1977 survey. This is not unexpected due to its annual habit and the depressed rainfall this past season. As I stated in my 1977 report, this population and one in the Tijuana Hills, are the only ones known on this side of the international boundary. The population is significant mostly from an academic point of view. It is frequent in Baja California, occurring to mid-peninsula.

**5** Comment noted. The March, 1984 survey revealed a very minor population of Ambrosia psilostachya on the site. It is the opinion of the consulting biologist (Wier Biological) that the Ambrosia species on this site is Ambrosia pumila and not hybrid. Regardless, the Ambrosia pumila, whether part of it may be of hybrid origin or not, is a significant biological resource, as stated in both the 1977 and 1984 survey reports.

6 I do not agree with the statement in the EIR that a transplanting alternative is not viable to mitigate what is presented as a significant impact. The truth of the matter is that Mr. Wier failed to successfully transplant the **Ambrosia** because he abandoned the plants he had salvaged in 1981 when he attempted to operate his own consulting business. Also those plants which were relocated at the Gillespie Field site were subjected to a weed abatement program about the runway. With this level of effort, I hardly believe a statement can be made as to transplanting being inviable. I have observed the plant's being established in a garden in National City. Once established, the plant behaves in a rather aggressive fashion, like other members of its genus.

I would propose that transplantation is viable. It can be achieved by in-situ removal of the plants, recontouring of the site and replacement of alluvial soil. This can be achieved in the back, western portion of lots 51, 50, 49, and 48. There is still a need for an open space easement, but one with the eastern boundary set mid-way in these lots and fenced. The easement should not be landscaped and it would require management for a few years to hold down weed competition until the **Ambrosia** stolons were established.

The **Dicranostegia** could also be established, but on a more sloping site in the easement. This would be done by seed propagation, since the plant appears to have an annual habit.

7 I would also recommend salvage of the **Ferocactus**. These are in demand for revegetation in the Tijuana Slough National Wildlife Refuge currently.

I believe this response will allow the City of Chula Vista to determine that, with a minor redesign of the open space easement, the project can be built without significant biological impacts.

Sincerely,

R. Mitchel Beauchamp

R. Mitchel Beauchamp
Pacific Southwest Biological Services, Inc.
Post Office Box 985
National City, California 92050
(619) 477-5333

6 Comment noted. It is important to point out that the population of these plants, rather than merely the individuals isolated from their natural environment, are considered significant. On-site preservation has been proposed and protection of the plant populations, so that lots 48-51 and 112 would be included in the preserve and would not be developed. An alternative form of mitigation has been proposed by the project applicant: transplantation of individual plants. It is the author's opinion that this is not an effective form of mitgation and therefore it is not acceptable as mitigation.

In general, a biological preserve area must be able to support self-sustaining populations: small, isolated preserves are more vulnerable to disturbance, improper drainage, and disruption of requisite ecological interactions such as may occur wih both these species. Over time, small populations may be subject to loss of genetic variability, thus affecting their ability to adapt to the environment, due to inbreeding.

There is little doubt that native plants can be cultivated in the garden. Many botanic gardens throughout southern California feature displays of native plants, including some that are considered difficult to propagate. San Diego Ambrosia can be maintained in pots for some time, and it has succeeded in the garden also; however to our knowledge, Orcutt's Bird's Beak has not been successfully cultivated outside the greenhouse. Dr. Larry Heckard of the Herbarium of the University of Cali-

6 fornia, Berkeley has transplanted seedlings of a Cordylanthus species in Fresno County, California, and after ten years plants from that introduction are still present at the site. He has grown Cordylanthus orcuttianus in pots in the greenhouse. Dr. Heckard also reports that Dr. James Griffin has seeded C. littoralis in the Monterey area, but Heckard is not aware of the progress of that effort (personal communication, 7/3/84).

There are, however, obvious and fundamental differences between botanic gardens and natural preserves with self-perpetuating populations. Botanic gardens do not attempt to nor do they succeed at re-creating populations, much as zoos and animal parks do not re-create faunas from the many individual beasts in captivity. They merely display living things. Botanic gardens require constant and expensive maintenance, whereas natural preserves require little or no maintenance.

Following is a brief analysis of the attributes of two different strategies, ON-SITE PRESERVATION and TRANSPLANTATION.

ON-SITE PRESERVATION

1. Lower construction costs, or no costs
2. Low maintenance costs, maintenance over a short period
3. Usually higher land costs
4. Conservation of the existing population within the ecosystem
5. Ecosystem remains relatively intact
6. Loss of genetic variability small
7. Chances for failure small

**6**

TRANSPLANTATION

1. Higher construction costs
2. High maintenance costs, perhaps over many years.
3. Usually lower land costs
4. Attempts to recreate original population within a new setting
5. Ecosystem greatly altered
6. Genetic variability lost
7. Chances for failure substantial. To our knowledge, there have not been many successful transplantations of "rare plants" in California, and none where San Diego Ambrosia and Orcutt's Bird's Beak have been handled.

**7** Comment noted. This recommendation does not reflect upon the adequacy of the EIR and does not pertain to appropriate mitigation for significant impacts. However, this recommendation is acknowledged and such action may be taken by the project applicant if he chooses to do so.

May 30, 1984
File # YE-008

TO: Doug Reid, Environmental Review Coordinator

FROM: Roger Daoust, Senior Civil Engineer

SUBJECT: Review of Draft EIR 84-6, 20 acre subdivision between Greg Rogers Park and Brandywine Avenue.

An engineering review of the subject draft EIR has been conducted. As in the earlier review of the preliminary draft EIR for the proposed subdivision, our examination covered the areas of drainage, geology, soils, land form. noise, traffic and utilities (public services-sewer and water). In this review, we focused primarily on drainage and sewerage, the two engineering areas in the previous report needing revision. Both of these subjects are adequately covered in the draft EIR. However, in this review we found two items under Traffic Circulation overlooked in our earlier review. Specifically:

8 1. P 29, 3rd para. 1st line. Insert "West of Brandywine" following Telegraph Canyon Road.

9 2. P 34, 1st para. Revise last sentence to read "If an easement were provided, it could be improved to a secondary access when property to the east is developed."

With the foregoing comments the draft EIR is satisfactory.

DND:mp

(83:EIR84-6)

RECEIVED
BY _____
JUN 1 1984
PLANNING DEPARTMENT
CHULA VISTA, CALIFORNIA

8 Comment noted. This addition has been made.

9 Comment noted. This statement has been superceded by subsequent discussions with the City and determined to be not necessar See Response #12.

SDG&E

**San Diego Gas & Electric**

FILE NO. --

June 19, 1984

City of Chula Vista
P. O. Box 1087
Chula Vista, CA 92012

Attention: Mr. Douglas D. Reid
Environmental Review Coordinator

RE: PUBLIC HEARING -
DRAFT EIR
CASE NO. EIR-84-6
CHULA VISTA WOODS AND
AMENDMENT, CHULA VISTA GENERAL PLAN
CASE NO. GPA-84-4

Dear Mr. Reid:

Thank you for notifying San Diego Gas & Electric about the subject hearing and draft EIR. SDG&E appreciates having the opportunity to comment.

While gas and electric distribution facilities can be made available to this project according to San Diego Gas & Electric's rules filed with and approved by the California Public Utilities Commission, the continued availability of gas and electric energy for this and future projects is dependent on the supply of fuel and other essential materials and governmental approval of facilities construction.

10 As stated in our letter of March 16, 1984 (copy attached) of special concern to SDG&E is the presence of an 8-inch high pressure gas main and a 138kV transmission line. We would like to re-emphasize the importance of continued unobstructive access to and along the transmission line for patrol, repair and maintenance.

If you have any questions about this matter, please call me at 696-2388. If you have questions about

RECEIVED
BY.....
JUN 21 1984
CHULA VISTA, CALIFORNIA



**10** Comment noted. The concerns expressed in the letter dated 3/16/84 were addressed in the site design, i.e. the uses proposed -- RV storage, landscaping and the access road -- will not hamper access by SDG&E to the facilities. In addition, the EIR includes mitigation measures on page 13 which ensure continued unobstructive access for repair, maintenance, and patrol of the SDG&E facilities.

the distribution of energy to or within the project please contact our South Bay District Planning office at 425-3060. Questions on distribution would probably be more appropriate when the project design is further along.

Sincerely,

Donna McGuire

Donna McGuire
Land Assistant

DMM:mae
Enclosure (on file at City of Chula Vista Planning Dept.)

cc: H. E. Richmond
R. Watt
South Bay Planning

MICHAEL CHRISTOPHER SPATA
ATTORNEY AT LAW

1007 FIFTH AVENUE · SUITE 606 · SAN DIEGO, CALIFORNIA
(619) 232-0201



HAND DELIVERED

June 27, 1984

Honorable Members of the
Planning Commission of the
City of Chula Vista
276 Fourth Avenue
Chula Vista, CA 92010

Re: Applicant: Chula Vista Woods
Project: Subdivision Map
Public Hearing: Draft EIR-84-6
Hearing Date: June 27, 1984
Agenda Item No.: 4

Dear Commissioners:

On behalf of United Enterprises, Inc., this is submitted in connection with the public hearing scheduled for this date involving the Draft Environmental Impact Report (EIR) for the proposed Chula Vista Woods subdivision project.

I

IMPROPER NOTICE TO UNITED ENTERPRISES, INC.

Essentially, it is contended that United Enterprises, Inc. has not been given adequate notice that the Draft EIR for this project is available for public review. The Distribution List for Chula Vista Woods EIR 84-6 discloses that United Enterprises, Inc. was not noticed. United Enterprises, Inc. has participated vigorously and substantially throughout the environmental review process for this project during the past seven years. In fact, because of the efforts of United Enterprises, Inc. in July, 1983, the decision was made to prepare an EIR for this project instead of a cursory Negative Declaration.

Therefore, regardless of whether the notice of public review has been published in the newspaper, United Enterprises, Inc. is entitled to direct written notice of the availability of the Draft EIR according to Public Resources Code §21092 and 14 California Administrative Code §15087. United Enterprises, Inc. has received notice of the Draft EIR on June 15, 1984; and as such, United Enterprises, Inc. is entitled as a matter of law to at least 30 days within which to review and comment upon the Draft EIR.

II

COMMENTS TO DRAFT EIR.

Although there has been inadequate time in which to fully address the glaring insufficiencies of the Draft EIR, the following represents merely preliminary comments originally structured by Longley-Cook Engineering, Inc. that will hopefully assist staff in beginning the process to cure the substantive defects in the Draft EIR proposed for this subdivision project. As staff is fully aware, evidence submitted by United Enterprises, Inc. is always carefully documented and thoroughly researched.

11 A. Drainage Impacts.

The Draft EIR does not address the mitigation of drainage impacts properly; that is, it is a misuse of the CEQA process to state that later designs will mitigate any adverse impacts when the purpose of CEQA is to clearly identify and fully analyze at the earliest possible stage all potentially significant impacts so as to insure their effective mitigation.

Stated more concisely, it appears that it will be necessary to reposition the storm drain system and to design two small detention basins in the southwest and southeast corners of the project in order to mitigate erosion impacts to a level of insignificance.

Moreover, the Draft EIR provides an inadequate analysis of hydrology, and it fails to provide necessary information requested months ago by United Enterprises, Inc. regarding erosion from drainage. Without knowing the hydraulic design, and without knowing the velocities of the flow and how such velocities will be reduced, it is not possible to state in the Draft EIR that there will be no erosion or siltation impacts.

12 B. Access Road Impacts.

United Enterprises, Inc. contends that the Draft EIR and project design reflect that an inadequate access road is being proposed because these documents show that an environmentally substandard road design (half width street) is being proposed. It is the clear understanding of United Enterprises, Inc. that the project applicant made a binding



**11** Comment noted. The details of the required storm drain and energy dissipation systems will be provided at the final design stage. The City Council is not qualified to review these details and therefore prefers to rely on its Engineering Department. If rip rap is not enough to handle design velocities, current regional standard drawings for energy dissipation structures are available to reduce increased velocities from on-site to a level of insignificance off-site. The protection of downstream property owners is an important responsibility of both the design engineer and the City. Neither will take these responsibilities lightly. The consulting engineer for the EIR continues to maintain that the quantities of runoff from and through this subdivision are manageable using currently available design techniques. The fact that the project applicant is working on final design techniques to reduce velocities and is providing this information to the commentor for review is evidence of a commitment to work with the adjacent property owner to assure satisfaction of both parties.

**12** Comment noted. The City of Chula Vista Engineering Department has the ultimate responsibility to determine the adequacy of a proposed road design. The City contends that the access street is adequate based on the development that it will be serving, i.e. 110 homes. Any binding contract that the project applicant may have had has no influence upon the adequacy of this EIR, especially based on a proposed design which has been reviewed and which meets the approval of the City Engineer.

**12** The confusion over the emergency/secondary access point is acknowledged. The following text revisions have been made to clarify that a emergency/secondary access will not be required as part of this project.

On page 33, the paragraph preceding the Mitigation Measures heading has been deleted. Another sentence has been added and that paragraph will read as follows:

"Although there is only one access provided to the site, City staff as well as Fire Department staff conclude that this access is adequate and no significant impacts will be incurred."

On page 34, the first and third paragraphs have been deleted.

contractural commitment to build a full width street for the only access to the subdivision, as evidenced by the attached cross section. Correction of this environmentally substandard road design error is demanded.

In connection with the discussion of a proposed secondary access to the subject site, it should be noted that the Draft EIR states on page 33 thereof that "[t]he traffic impact from the proposed project is considered quite minimal and therefore no mitigation measures are required." However, on the next page of the Draft EIR, it is recommended that an "emergency access point" be provided in the site design. This recommendation is superfluous because the Draft EIR does not acknowledge that there is a need for mitigation since there are no traffic impacts. In any event, the most logical emergency access route should be located through the adjacent Greg Rogers Park.

On the other hand, if the Draft EIR is interpreted to require this secondary access route, then all of the environmental impacts that were disclosed during the multitude of public hearings that had been convened for the Chula Vista Woods Project are applicable and must be discussed in this Draft EIR. Consequently, the attention of staff is especially directed to the evidence submitted by United Enterprises, Inc. during the CEQA public hearing held in 1983 for this project. A failure to consider these carefully prepared scientific documents will be tantamount to a breach of the CEQA process because these documents contain relevant information that will assist the City in fulfilling its duty of full disclosure during the CEQA process.

C. Omissions in the Draft EIR.

The Draft EIR fails to discuss significant topics or issues, including, but not limited to, the following:

**13** (1) Cumulative impacts set forth in previous documents submitted by United Enterprises, Inc. and others to the City of Chula Vista regarding this project;

**14** (2) Growth Inducing Impacts of subdivision project and Otay Water District future water main project;

**13** Comment noted. Consultation with City staff revealed one letter dated November 21, 1977, which contained comments on an earlier project proposed for this site. The issues discussed in that letter pertained to an access route running east to Brandywine, drainage impacts, sewer service, and land use issues. These issues either are no longer applicable to the current project or have been included in the discussion of this EIR.

**14** Comment noted. The growth-inducing impacts of this prject are discussed on page 49 in the EIR. The Otay Water District's future water main project is not considered a growth inducing impact of this project. Conversations with the District staff yielded the following information which should clarify the question of whether or not the Chula Vista Woods project is a key link to constructing a new water main in the area:

The planned 12" main that would traverse east to west to connect a 12" line in Brandywine and a 16" line located on the east side of Greg Rogers park, has been planned by the District for the last 10 years. When proposals were made to develop the Chula Vista Woods site several years ago, the District felt that two tasks could be accomplished at once, more efficiently, if the line could serve both the District's needs and the development's needs. The differ-

**14** ences between doing each project separately involves the location of the pipe (if it doesn't serve Chula Vista Woods it would be located on its southern boundary versus in the middle of the site); sizing of the pipe; and financing of the District's project. The District would be favorable, of course, to having development fees finance part of this project. However, the District is <u>not</u> dependent upon outside development fees to implement the pipeline construction. It just would be more efficient to implement both projects at the same time.

The purpose of the District's project is to improve the adequacy, or "bolster", the water line system in the Chula Vista area, specifically in the southern portion of the city, which is served by only one line. Two lines also would allow higher water pressure to be available.

Thus, we continue to maintain that the Chula Vista Woods project is not growth-inducing based on Otay Water District's plans to install a water main from one existing line to another existing line. Service is not being extended beyond existing facilities to serve this project and lines already exist to serve future development to the north and east.

**15** (3) Restrictions and safety requirements within easements for high voltage transmission lines and/or high pressure gas mains.

III

CONCLUSION

As previously stated, there has been an inadequate period of time to prudently document and scientifically research the real and substantial impacts that will be generated from the proposed project. Hence, a public hearing should not be held until United Enterprises, Inc. is accorded its due process rights under law, thereby enabling United Enterprises, Inc. and its consultants to complete their environmental analysis.

Additionally, it appears -- from the way in which this entire CEQA process has been conducted vis-a-vis United Enterprises, Inc. -- that the City is operating in a vacuum as to the long and painful history of this project that has spanned at least seven years.

It seems that all of the concerns -- previously voiced by United Enterprises, Inc. and acknowledged by the City Council -- are now being ignored. If this incredible approach continues in the face of past public hearings and evidence submitted to the City Council, then United Enterprises, Inc. has no choice but to vigorously present its case before the City Council or the judiciary.

It is respectfully requested that the Planning Commission reschedule this public hearing at least to July 25, 1984 so as to conform with the notice requirements of existing law.

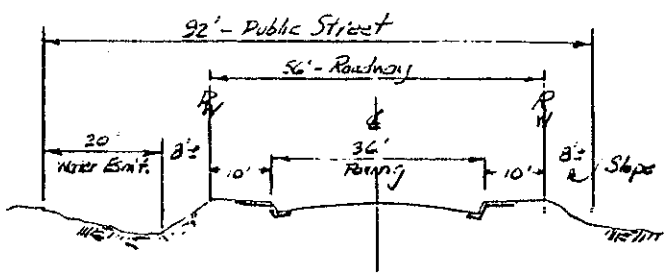
Respectfully yours,

Michael Christopher Spata

Michael Christopher Spata

MCS:lg

cc: United Enterprises, Inc.
City Council (5)
Planning Department
City Attorney
Chula Vista Woods
Longley-Cook Engineering, Inc.




PUBLIC STREET : Area = 2.34 Acres



**15** Comment noted. The reader is referred to mitigation measures delineated as part of Response #20.

MICHAEL CHRISTOPHER SPATA
ATTORNEY AT LAW

1007 FIFTH AVENUE · SUITE 808 · SAN DIEGO, CALIFORNIA 92101
(619) 232-6291

HAND DELIVERED

July 25, 1984

Honorable Members of the
Planning Commission of the
City of Chula Vista
276 Fourth Avenue
Chula Vista, CA 92010

Re: Applicant: Chula Vista Woods
Project: Subdivision Map
Public Hearing: Draft-EIR-84-6
Hearing Date: July 25, 1984
Agenda Item No: 3

Dear Commissioners:

United Enterprises, Inc. hereby submits its comments to the Draft Environmental Impact Report for the Chula Vista Woods Subdivision project (Draft EIR-84-6). The basis of these comments is a technical report prepared by Longley-Cook Engineering, Inc.

After reviewing these comments, it is clear that the Draft EIR contains numerous insufficiencies and omissions, thereby warranting, at the very least, a major revision of the environmental document with a concomitant public review period to insure compliance with CEQA and fundamental notions of due process.

Therefore, it is respectfully requested that (1) the oral and written comments of United Enterprises, Inc. be made a part of the record; (2) the comments be considered in an equally scientific and responsive manner; and (3) your Commission order the major revision of the text of the Draft EIR with an accompanying directive that such revised text be recirculated for proper public review and commentary.

Additional comments will be made at the appropriate time relating to the proposed General Plan Amendment, Rezoning and Tentative Subdivision Map dimensions of this project.

Very truly yours,

Michael Christopher Spata

Michael Christopher Spata

MCS:lg

cc: United Enterprises, Inc.
Longley-Cook Engineering, Inc.

MICHAEL CHRISTOPHER SPATA
ATTORNEY AT LAW
1007 FIFTH AVENUE - SUITE 808
SAN DIEGO, CALIFORNIA 92101 (619) 232-6291

BEFORE THE PLANNING COMMISSION

OF THE

CITY OF CHULA VISTA

| | |
|---|---|
| In the Matter Of The Public Hearing For Consideration Of The Draft Environmental Impact Report (Draft EIR-84-6) For Chula Vista Woods/Gardner Investment Properties. | ) DECLARATION OF MARK T. LONGLEY-COOK, Ph.D., P.E., and B.A. (WENDY) LONGLEY-COOK, Ph.D.,P.E OF LONGLEY-COOK ENGINEERING, INC. |

MARK T. LONGLEY-COOK and B.A. (WENDY) LONGLEY-COOK, hereby declare as follows:

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1. We are principals of Longley-Cook Engineering, Inc. which has been retained by Michael C. Spata, Esq. on behalf of United Enterprises, Inc. to provide technical analysis of, and comments to, the Draft Environmental Impact Report (Draft EIR-84-6) regarding the proposed Chula Vista Woods Subdivision sponsored by the project applicant, Gardner Investment Properties.

2. Attached as Exhibit "A" and made a part hereof is a study prepared and submitted by us as principals of Longley-Cook Engineering, Inc. which is entitled: "United Enterprises, Inc. Comments on Draft EIR, Chula Vista Woods, EIR-84-6."

3. Exhibit "A" has been prepared on the basis of reviewing the public files relating to this project that are maintained by the City of Chula Vista. In addition, Exhibit "A" must be considered in conjunction with the copious comments that have been provided by United Enterprises, Inc. in the past regarding the environmental impacts of the proposed Chula Vista Woods Subdivision project. These comments, as well as a delineation of our professional qualifications, are on file with the City of Chula Vista and direct reference must be made to these public files. Moreover, documents filed with the Otay Water District involving the environmental impacts of a proposed waterline for the Chula Vista Woods Subdivision are attached to Exhibit "A" for further elaboration and substantiation of critical environmental impacts that will be suffered.

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ATTORNEY AT LAW
1007 FIFTH AVENUE - SUITE 808
SAN DIEGO, CALIFORNIA 92101

We declare under penalty of perjury that the foregoing is true and correct. Executed on July 25, 1984 at San Diego, California.

Mark T. Longley-Cook, PhD., PE.
President of
Longley-Cook Engineering, Inc.

B.A. (Wendy) Longley-Cook, PhD., PE.
Vice President of
Longley-Cook Engineering, Inc.

LONGLEY-COOK ENGINEERING, INC.
Civil, Environmental and Traffic Engineering, Computer Modeling Consultants

Mark T. Longley-Cook, Ph.D., R.C.E.
Wendy Longley-Cook, Ph.D., P.E., J.D.
L.H. Longley-Cook, M.A., F.C.A.S.
Alan C. Sweeney, B.A., J.D.

636 Broadway, Suite 318, San Diego, California 92101 (619) 239-3056

UNITED ENTERPRISES, INC.

COMMENTS ON

DRAFT ENVIRONMENTAL IMPACT REPORT

CHULA VISTA WOODS

EIR-84-6

Submitted to

Planning Commission of

The City of Chula Vista

July 25, 1984

Exhibit "A"



TABLE OF CONTENTS

INTRODUCTION

Longley-Cook Enginering, Inc. has reviewed the Draft Environmental Impact Report (Draft EIR) for Chula Vista Woods, number 84-6. We find that the Draft EIR contains many errors and omissions. Our comments follow.

DRAINAGE

**16** The hydrology analysis presented in the draft EIR is totally inadequate and lacks sufficient basis to conclude anything on the sufficiency of the drainage system. What little hydrologic analysis there is (EIR pages 16 - 19 and a one and one half page analysis in Appendix B to the EIR) is engineeringly incorrect. The EIR estimates project runoff as the total basin flow (as reported in the Fogg report) times the ratio of the project area within the subbasin and the total subbasin area. This cursory analysis is engineeringly incorrect because it improperly assumes the same runoff coefficients throughout the basin, and it completely ignores the differences in the times of concentration.

It is standard practice to use a runoff coefficient, i.e., the fraction of rainfall which runs off the land as surface runoff (the remainder infiltrates into the ground), for undeveloped land as about 0.45 (reference 1). For a fully developed area such as this, the runoff coefficient is 0.65 (reference 1). Thus, ignoring times of concentration for the moment, one would expect an increase in quantity of runoff of 0.2/0.45 or about 45%. The EIR states on page 18 that the increase will be 15% and refers to Appendix B for runoff calculations. But Appendix B contains no runoff calculations, so that the 15% statement is undocumented. Developing an area would decrease the time of concentration and increase the runoff even further. Therefore, not only is the EIR's statement undocumented, but it appears to be a gross understatement of the increase in flow.

The City of Chula Vista has an "Environmental Review Policy" (reference 2). Section 8 of that document relates to Technical Support Documents. Section 8.1 pertains to Flood Control/Hydrology and states:

> In any project which may result in significant disruption of existing water flows, increase or diversion of runoff, acceleration or dispersion of flows, or interference in the surface or sub-surface movement of waters, a technical support document shall be prepared by a qualified Civil Engineer.

Appendix B simply does not qualify as a technical support document. Appendix B merely sumarizes relevant portions of the Fogg report. It contains no runoff calculations, no velocity calculations, and even acknowledges that the specifics of the storm drain system have not been proposed. Appendix B is a conclusory document of 1.5 pages which contains no technical analysis at all. It relies on some future design, for which it sets no parameters or limitations. Appendix B may attempt to take the form of a technical support document, but it contains no substance and will not support an engineering conclusion of no significant impact.



**16** Comment noted. The quantity of original runoff from the 3 subject basins is given by the Fogg Report to be 249 C.F.S., approximately 39 C.F.S. of which originates within the subdivision boundary. Development of this subdivision will cause an increase in runoff on the order of 12 - 15% for the portion within the subdivision boundary. In the Longley-Cook analysis it is incorrectly assumed that the runoff coefficient for this subdivision in its natural state would be 0.45. From the Chula Vista Drainage Manual one can see that this would be the correct coefficient for "vegetated slopes-flat". In the Fogg Report it is noted that a coefficient of 0.60 corresponding to "vegetated slopes-steep" was used for these three basins. Using the same rational as in the Longley-Cook analysis one would then expect 0.65 - 0.60/.60 = 8%. Added to this, is a figure of 4% - 7% for increases in the intensity (I) due to decreases in the time of concentration. The resulting 12 - 15% is consistent with City of Chula Vista Drainage Manual design standards; the 45% mentioned in the Longley-Cook report is not.

In terms of a technical support document, this project will not result in significant disruption of existing water flows or a diversion of runoff; thus, it is not necessary for Appendix B to qualify as a technical support document.

Also see Response #11.

The draft EIR needs to be sent back for more work and should be reissued after the required additional analysis is complete. With respect to hydrology, in addition to providing correct runoff calculations, the calculations on the sizing of the storm drains, their respective slopes and the discharge velocity.

Velocity is the key parameter here because velocity primarily determines if erosion or siltation will occur. In January 1984, United Enterprises, Inc. requested a meeting with HCH, the project's engineers, to relate its engineering concerns on the project. The meeting took place on February 7, 1984, at which time our specific concerns regarding water discharge, velocity and erosion impacts to United Enterprises' property to the south were proffered. No hydrology calculations or designs have been provided to date. United Enterprises, Inc. has literally gone out of its way to disclose its concerns early on, well before the environmental process ever started.

Even the City Engineer, John Lippitt, in his memoranda of January 10 and June 28, 1984 strongly recommends extensive revisions to the design of the drainage system in light of the substantial runoff velocities anticipated. A maximum runoff velocity of 1.5 to 2 feet per second should be included in the design to avoid erosion.

Figure 8 in the EIR indicates the proposed on-site drainage. It shows, in the southwest corner of the project, drainage being dumped onto United Enterprises' property via a brow ditch with no mitigation. At the south end of the property, near the southwest corner, it shows drainage dumped down a very steep embankment onto a small amount of rip-rap, onto United Enterprises' property.

There are feasible alternatives to the system shown on Figure 8. For example, a detention basin at the southeast corner of the project will be needed to mitigate impacts. The storm drainage system can be reoriented to lessen impacts offsite. If lots 47 - 50 and lot 111 are developed, a detention basin at the southwest corner will be necessary to mitigate impacts. If lots 47 - 50 and lot 111 are preserved for biological reasons (See biological section of the EIR, pages 20 - 26 and Appendix C), then the runoff can be dissipated evenly along the southwest side of "C" Street, and it will at the same time provide more water for the biological resources.

There is no basis in the record on which to state that no significant drainage impact will occur. On the contrary, there is overwhelming evidence in the record that substantial erosion occurs now and that this project will make it substantially worse.

In summary, an EIR must show that all significant impacts will be avoided or mitigated to a level of insignificance. The hydraulic design of the storm drain system is the only way to assess impacts and mitigate them as necessary. It is no less than a thwarting of the very purpose of CEQA to dismiss all possible impacts with the sentence: "A properly designed and constructed [drainage] system will prevent downstream flooding and erosion". The time to evaluate the design is now, at the environmental review stage; and not later, because later the public has no official or effective mechanism to make its comments known and have them seriously considered.

In essence, the EIR seems to be saying that because the City Engineer will review all the design plans later, he will see that all potential impacts are mitigated. The fallacy of this approach is that CEQA does not place the burden of mitigating environmental impacts on the approval of the City Engineer. CEQA places the burden of insuring proper mitigation squarely on the decision making body, in this case the City Council. Where significant impacts are foreseen, the design must show that it will in fact mitigate those impacts to a level of insignificance. A recommendation by the Planning Commission for a complete revision of the drainage analysis to the detail identified herein is mandated because the EIR fails to adequately and correctly assess the impacts.

EMERGENCY VEHICLE ACCESS

**17** The EIR recommends, as a mitigation measure in the traffic section (EIR, page 34), that a altenative emergency vehicle access be provided. This recommendation stems from a statement in the traffic report by Federhart & Associates (Appendix E of the EIR, page 11). No rationale is revealed for this statement. The fire department indicates in Appendix F — Fire Protection Worksheet, item 8 that the access is satisfactory. The police department worksheet does not even mention emergency access as being a concern. Therefore, the only one who is recommending alternative emergency vehicular access is Mr. Federhart, and he fails to state why alternative emergency access is needed.

Mr. Federhart recommended the emergency vehicle access via Brandywine Avenue between lots 24 and 25 with a 12 foot wide unpaved road. He failed to consider the topography between lots 24/25 and Brandywine Avenue. The surface of Brandywine Avenue is located on 4 to 5 feet of fill above the native grade at that location. Furthermore, a wash with a depression of over 15 feet exists between lots 24/25 and Brandywine Avenue. The net result is that the emergency vehicles would have to climb grades of about 15% on unpaved roads. A check with the fire/ambulence personnel reveals that they probably would not bring their vehicles over such a road. Therefore, either such a route is totally impossible to use, or significant amounts of grading and filling will be required before emergency vehicles will be able to gain access. Such grading and filling would totally bifurcate United Enterprises' prpoerty, cause potential drainage problems, and result in substantial severance damages. These impacts have been forcefully and successfully argued before the City of Chula Vista over the past seven years of the prior Chula Vista Woods project. This information is contained in records on file in the Planning Department and in the Engineering Department. Consistent with the policy of CEQA to avoid repeating past documents and testimony, all this information on file with the City is hereby incorporated by reference herein. Additional documents regarding these impacts has also been submitted to the Otay Water District. That information is attached hereto as Enclosure 1 and incorporated by reference herein.

In his letter of July 18, Mr. Federhart reconsidered and withdrew his recommendation for emergency vehicle access. However, since his original statement is in the Draft EIR, emergency access needs to be addressed here.

Page 38 of the EIR states that the emergency access of the project had been



**17** Comment noted. As discussed in Response # 12 , an emergency/secondary access is not deemed necessary by the City and the text has been revised to reflect this position.

reviewed by the Fire Marshall. City staff has reported to representatives of Longley-Cook Engineering, Inc. that this statement was untrue and will be repudiated in the final EIR.

The need for alternative emergency vehicle access is seriously questioned. The EIR indicates the need stems from the potential of an on-site emergency resulting in congestion in the access road which would hamper the passage of emergency vehicles. We strenuously point out that the adequacy of the access road is producing this impact because the project only proposed to construct a half-width street. The project applicant and United Enterprises, Inc. have a contract for the construction of a full-width residential collector street with a 40 foot-wide paved driving surface.

It is submitted that, if a full 40 foot wide street were to be constructed, as agreed to by the project applicant, any potential traffic conflicts with emergency service vehicles would be avoided. Therefore, the need for alternative emergency vehicle access does not exist.

If, for some compelling reason which has not been revealed to date, the City feels that some alternative emergency vehicular access is needed, it would be far more logical to place this access through Greg Rogers Park. For example, vechicles could proceed adjacent to the baseball playing fields, turn north along the OWD water easement (20 feet) until the paved end of the access road is reached. Since OWD emergency vehicles must have access along their easement and since only minor grade charges occur via this route, combining these emergency vehicle routes is the environmentally and ecomonically preferred solution. Since the nearest fire station is located about one mile southwest of the project site (EIR, page 38), such an emergency vehicle route would be a valuable time saver.

Another possible impact which the EIR fails to discuss, but which must be considered, is the potential for blockage of the access road due to a downed high voltage transmission line. SDG&E has provided data which we have analyzed for potential impacts. In the more than 500 miles of high voltage transmission lines which SDG&E operates, only three events have occurred in the last 15 years which resulted in down high voltage lines. One of those events involved a plane striking a line, the second event involved a helicopter striking a line, and the third involved the misaiming of artillery at MCB Camp Pendleton during practice and literally shooting a line down. Using this information and applying standard statistical techniques, one can determine that the probability of a downed line in the span between which the access road passes is once in every 10,000 years. The probability of an emergency occuring on site simultaneously with a downed power line is in excess of once in every million years. The probability of an explosion in the high pressure gas line with an on-site emergency is comparable to that of the downed power line, i.e., one in a million years. These probabilities are so small that such an impact can truly be considered infinitesimal.

In summary, the issue of alternative emergency vehicle access will be totally avoided by the applicant's construction of a full-width, 40 foot-wide residential collector street in accordance with contractual obligations. The City's acceptance of a half-width road which would thereby produce significant impacts requiring an alternative emergency access point is an arbitrary violation of CEQA.

SECONDARY VEHICLE ACCESS

**18** The EIR does not address secondary vehicle access at all. This is probably so because none is proposed. However, the City Engineering staff proposes to require this as a condition for the tentative map. See memoranda from Roger Doust to Planning Department of May 30, 1984 and from John Lippitt to Planning Department of June 28, 1984, attached hereto as Enclosure 2 and incorporated by reference herein.

It should be noted that there are several recent projects within the City of Chula Vista which consist of about 100 residential units and which have only single vehicle access. We have inspected about six of these and have brought them to the attention of City staff. Therefore, there is no current city policy to require secondary access in a development, and the requirement of secondary access must be based solely on need as disclosed in a traffic study. For the Chula Vista Woods project, the traffic study has found that the project can be adequately served with one access. During the submittal process for past versions of the Chula Vista Woods projects, both for the 54 unit version and for the 110 unit version, with a single point of access from Brandywine Avenue, no mention by staff was made of a need for secondary access.

Since it is now known that staff is suddenly raising secondary access for all vehicles from Brandywine Avenue to the Chula Vista Woods as an issue, it is totally contrary to the purpose of CEQA to ignore the resulting impacts, or to point out the impacts as a response to a comment, when it has been known that the issue of access via Brandywine Avenue has been the subject of extensive controversy over the past seven years. The reason that this approach of disclosing impacts as a response to a comment is, in this case, contrary to CEQA is that the general public and specifically United Enterprises, Inc. will have no formal public hearing to comment on the new issues or on the adequacy of the analysis of the impacts contained in the responses.

If an easement for secondary access is reserved in the Chula Vista Woods project for a future connection to adjoining property, then the Chula Vista Subdivision Manual, pages 56 and 57, require that the applicant shall submit an alignment and profile demonstrating the feasibility of such future extension. The profile shall extend a minimum of 300 feet beyong the subdivision boundary (Paragraph 10). In addition, paragraph 11 requires that:

> A temporary turnaround with a mimimum radius of 24 feet shall be constructed upon the adjoining property (If the adjoining property owner grants permission to construct such temporary turnaround on his property;
>
> Or, a temporary street shall be constructed crossing the adjoining property;
>
> Or, a permanent type cul-de-sac will be constructed within the development boundaries as a temporary measure until the street is extended.



**18** Comment noted. See Response above and Response # 12 . It is acknowledged that the Engineering Department is requiring a stub-out street as a condition of approval for the Tentative Map. A feasibility study will be required before a Final Map is approved. The Engineering Department envisions that meetings will be held between the City, the project applicant and United Enterprises, Inc. to work out a future alignment which is agreeable to all parties. Stub-out streets are a common practice and reflect good planning in that adequate links are provided for the overall circulation system.

CEQA mandates that impacts from secondary actions be reasonably explored. At this point, it appears that a primary impact of such action, i.e. growth induction would not be significant because access is already available to property to the east via Brandywine. It can be speculated that a future road could cause other impacts in the areas of biological resources, archaeological resources, landform and drainage. The degree of these impacts cannot be predicted, however, because there is no information available yet for a future alignment. In any case, a road is not being constructed as part of this project and it is not being approved as part of this project. A road will not be constructed until future development occurs, and that development will be subject to environmental review. Future discretionary action will be required for a road, i.e. a grading

Therefore, since the owner of the adjoining property will not grant permission to construct a temporary turnaround on its property near lots 24 and 25, the potential for a condemnation action and a temporary street across United Enterprises' property to Brandywine Avenue is foreseeable. In addition, the placement of an easement for future street extension will dictate where United Enterprises must place its streets when it develops its adjoining property. The placement of such street to join up with this easement is not just reasonably foreseeable, but it a certainty because of the requirements of the City's Subdivision Manual. All present and future impacts of such street or streets must be considered now in the EIR so that all significant impacts can be mitigated and all other feasible alternatives considered.

It would be a total misuse of CEQA to preclude future public comment on this important issue. What is happening, in essence, is that important environmental issues have been totally ignored by the draft EIR. Public comment has pointed out these deficiencies. The responses to the public comments, as included in the final EIR, will discuss these impacts for the first time. But the public comment period will have been closed, so in effect the public is being denied its right to comment on the analysis of environmental impacts which should have been fully analyzed in the draft EIR. CEQA's purpose is to discuss and eveluate all environmental issues early in the development state.

AESTHETICS

**19** The EIR fails to address the possibility of junk vehicles being stored in the so-called recreational vehicle storage area. Greg Rogers Park is a highly used park adjacent to the site. The park is at a higher elevation than the project site so that people in the park literally overlook the western area of the project. Page 13 of the EIR states that a fence will be placed to provide privacy to those lots located next to the park. But the draft EIR mades no mention of the aesthetic impact that could foreseeably result on people using the park overlooking a storage area containing unsightly vehicles. This visual effect needs to be addressed in the EIR. Furthermore, the EIR should address how unsightly objects, vehicular or otherwise, would be removed if such objects are placed in the area.

ELECTROSTATIC INDUCTION

**20** Page 3 and Figure 5 of the EIR disclose that the proposed project will include a recreational vehicle storage area underneath the high voltage transmission line, which crosses the project site in its northwest corner.

A substantial electrostatic and magnetic field is produced by an operating high voltage transmission line. Electric fields of 60 hertz (Hz or cycles per second) are generated by the transmission line(s). The field strength is usually expressed in units of kilovolts per meter (kV/m). The maximum ground-level electrical potential produced by a 138 kV transmission line depends on several factors such as number and configuration of wires, voltage phase spacing and height above the ground. Electrostatic fields can induce a voltage onto conducting objects within the field,



**18** permit, and CEQA mandates that such actions be given environmental review. Thus, United Enterprises will have opportunities in the future to comment on the adequacy of the analysis of future road plan impacts.

It also is important to point out that the subdivision manual is a guide which is flexible for use by the City. The requirements listed in the manual may be adjusted to fit particular circumstances associated with this project.

**19** Comment noted. The following is added to the third paragraph on page 20: "Another visual effect which may occur is that of junk vehicles being stored in the RV storage lot. Mitigation is available, as discussed below, which will address this potential concern."

The following is added as the second paragraph under Mitigation Measures on page 20: "Through precise plan review and CC&R's for the subdivision a requirement for landscape screening will be included and a limitation as to the types of vehicles eligible for storage will be addressed. Inoperable vehicles will not be allowed to collect in the RV storage area, as provided in Chula Vista Municipal Code 19.58.260."

**20** Comment noted. While the information presented by the commentor is comprehensive as well as lucid, we feel that the assumptions as presented are greatly exaggerated in terms of going beyond "worse case". For example, assuming

i.e., objects within the right-of-way. A conducting object is generally an object with a substantial amount of metal in it, such as trucks or campers.

If an object (or person) which is grounded comes into contact with or comes close to a conductive object, such as a recreational vehicle, which has an induced potential, from being placed under a transmission line, electric current will flow to the ground through that object (or person). This current is called the "short-circuit" current. We all know it commonly as an electric shock, such as a spark which one gets after scuffing along a nylon carpet and then touching a door knob.

Field measurements have been made to determine short-circuit current values for various objects in a 60 Hz electric field (references 3 and 4). These measurements are summarized in Table 1.

Table 1. Short-Circuit Induced Current for Various Objects.

| Object | Short-circuit current/Elec field |
|---|---|
| person | 0.02 mA/kV/m |
| car | 0.11 mA/kV/m |
| pickup truck w. camper | 0.28 mA/kV/m |
| small bus | 0.39 mA/kV/m |
| tractor-trailer truck | 0.91 mA/kV/m |

Typical ground level field strengths for a 138 kV line are in the range of 2 to 3 kV/m (reference 5). By multiplying this field strength by the values listed above, one can obtain an estimate of the short-circuit current for, say, a large camper stored under the transmission line. Assuming that a large camper is equivalent to a tractor-trailer truck, a short-circuit current of about 3 mA could reasonably be expected.

There have been extensive studies conducted to determine physiological effects on humans caused by electric shock response of various current levels. "Let-go" threshold current, i.e., the current at or above which 0.5 percent of the people would be unable to intentionally release a conductive object, has been generally accepted at 4.5 - 5 mA (references 6 and 7). For this reason, unduced short-circuit current is limited by the California Public Utilities Commission General Order 95 to less than 5 mA. Although the short-circuit current here would not appear to reach this 5 mA limit, people are affected by currents less than the 5 mA standard. Table 2 summarizes the results of one of these studies (reference 8).

Comparing these values with the short-circuit current which can be expected within the transmission line corridor at the project site, one sees that effects of annoyance, startle, and painful sensation could result if a person received a shock from a stored recreational vehicle.

The draft EIR fails to even consider electrostatic induction and its effects. These effects must be addressed in detail in the EIR, and suitable mitigation must be provided to avoid significant impacts which are likely to occur. Even a low



**20** that a large camper is equivalent to a tractor-trailer is slightly out of scale. A tractor-trailer (MAC-type truck) is obviously much larger than even a "large" RV. Thus, assuming that the vehicles parked in the RV storage area are more realistically the size of a "pickup truck with camper" or a "small bus", a short-circuit current of between 0.84 and 1.17 mA could be expected (0.28 mA x 3 kV/m = 0.84 mA and 0.39 mA x 3 kV/m = 1.17 mA). This is well below the "let-go" threshold current of 4.5 - 5 mA indicated in the commentors' references. Table 2 actually shows a "let-go" threshold at a much higher current. For this reason we feel the comments expressed have been overstated, and because of the small degree of current which may be expected, no significant impacts are anticipated to occur to people who store RVs in this lot.

Regarding the concern about people who have pacemakers, one must first assume what the chances are of such a person moving into the Chula Vista Woods development, and secondly, having an RV to store in the RV storage area. One could then go further and try to determine if the pacemaker is a "demand" or "fixed rate" model and assume the age of the pacemaker. However, one misses the point that people who have operations to receive pacemakers are trained and taught about the precautions they must take in their lives to ensure their pacemaker's proper functioning. People with pacemakers would perhaps not move to Chula Vista Woods if they felt the overhead power lines would endanger their lives; however, contact

Table 2. Human Responses to Various Electric Shock Currents.

| Current (mA) | Observed Effect |
|---|---|
| 0.7 | no appreciable effect |
| 0.7 - 1.1 | perception threshold |
| 1 - 3 | mild sensation of annoyance |
| 2 - 4 | startle reaction |
| 3 - 10 | painful sensation |
| 6 - 9 | "let-go" threshold for 0.5% of tested individuals |
| 10.5 - 16 | "let-go" threshold for 50% of tested individuals |
| 15 - 23 | severe shock & onset of respiratory tetanus |
| 30 | respiratory paralysis |
| 75 - 200 | ventricular fibrillation |
| 4000 | heart paralysis |

where:

perception means that the person is just able to consciously detect the stimulus at a given detection probability.

annoyance means that the person would consider the sensation to be a mild irritant if it were to occur repeatedly.

startle mean that if the stimulus occurred unexpectedly, it would likely produce an unintentional muscular reflex capable of being hazardous under a defined set of circumstances.

let-go means that a person cannot let go of a gripped conductor as long as the stimulus persists due to uncontrollable muscle contraction.

respiratory tetanus means that a person is unable to breathe as long as the stimulus is applies due to contraction of the muscles responsible for breathing.

fibrillation means the uncoordinated asynchronous heart contractions which produce no pumping action.



**20** with several local hospitals (Scripps Hospital, La Jolla, Cardiovascular Laboratory, Scripps Hospital, Encinitas, Cardiopulminary Department, and UCSD Medical Center Heart Station) revealed that generally speaking, problems would not be anticipated for a person with a pacemaker. In any event, the developer of a project is not responsible for providing the ideal environment for people with pacemakers or others who have unusual circumstances pertaining to their health. The same analogy can be made about developments which occur on bluffs and how future sight-impaired residents will be protected.

It is reasonable to expect that SDG&E will post signs indicating their facilities; if SDG&E does not, the developer can, and the following mitigation measures will be added to those already listed on page 13 pertaining to potential conflicts with the facilities:

"o signs will be posted in the right-of-way to inform people using this area that SDG&E transmission lines are located nearby;

o Appropriate zoning codes or CC&R standards will be enforced to ensure that people will not live in any RV which is parked in the RV storage area since it is not allowed by the California Public Utilities Commission;

short-circuit current could affect a person who has a pacemaker. The EIR must discuss how such persons would be protected.

The California Public Utilities Commission also prohibits habitable structures within rights-of-way for high voltage transmission lines. The EIR should address how the area will be controlled to prohibit persons from living in the recreational vehicles.

A related problem could also occur if people are not prevented from working on vehicles stored in the transmission easement. For example, it is possible that a person storing his RV may drain fuel from the tank, or conversely put fuel into the tank. A spark generated during draining or refueling could, under the right circumstances, result in the ignition of the fuel. The EIR should address how such draining/refueling will be effectively prohibited.

RELOCATION OF WATER FACILITY

**21** At the intersection of East Naples Street and the proposed access road, there is an OWD water facility which is presently fenced. Construction of the access road will require that this facility be relocated. United Enterprises, Inc. requested information as long ago as February 1984 from HCH & Associates, the engineers for the project applicant, for information in writing as to where that facility was to be relocated and whether further condemnation of United Enterprises' land would result because of the relocation. No response has been received and the EIR fails to even mention these impacts.

CUMULATIVE IMPACTS

**22** The CEQA quidelines, 14 Cal. Admin. Code §15130, require an adequate discussion of cumulative impacts:

> (1) A list of past, present, and reasonably anticipated future projects producing related or cumulative impacts, including those projects outside the control of the agency.
>
> (2) A summary of the expected environmental effects to be produced by those projects with specific reference to additional information stating where than information is available, and
>
> (3) A reasonable analysis of the cumulative impacts of the relevant projects. An EIR shall examine reasonable options for mitigating or avoiding any significant cumulative effects of a proposed project.

Appendix F to the EIR contains a worksheet returned by the Otay Water District. This worksheet reveals that OWD has plans to construct a pipeline from the 16-inch pipeline in the easement on the western edge of Chula Vista Woods to the pipeline under Brandywine Avenue.

Section 15065 of the CEQA Quidelines and Section 5.2.3 of the Chula Vista "Environmental Review Procedure" mandate a finding of significant impact when the



**20** o the CC&R's developed for this project will specify the types of activities which will be allowed to occur in the RV area, i.e. the extent to which someone can work on their vehicle, change oil, etc... consultation with SDG&E regarding appropriate safety standards is suggested when the CC&R's are developed."

**21** Comment noted. Discussions with Otay Water District (8/9/84) indicate that the fenced water facility is no longer in operation. The air vacuum and flange located there will merely be lowered into the ground at the same location, when the access road is constructed the fence will be removed. Thus, condemnation of United Enterprises' land will not result from these activities.

**22** Comment noted. As discussed in Response #14 , recent contact with the Otay Water District (8/3/84) revealed that the district is not dependent upon the Chula Vista Woods project for the construction of a water main which has been planned for, for the last 10 years. However, if both tasks could be accomplished at once, i.e. the District's project implemented and the development project serviced for water, the District would, of course, prefer the developer to help finance such costs, in this post-Proposition 13 era.

The project has been described further on page 40, as indicated in Response #24 . Again, such action is not considered growth-inducing, so cumulative impacts are not addressed.

project has possible environmental effects which are individually limited but cumulatively considerable, when viewed with the effects of past projects, other current projects and probable future projects.

Appendix G to the CEQA Quidelines indicates that an impact is generally considered significant when it will extend a sewer trunk line with capacity to serve new development. By analogy, this Chula Vista Woods project will allow the construction by OWD of a primary water main which will produce a looped water distribution system and which will provide more capacity for serving new development. OWD staff has stated that OWD does not have the capital to build the pipeline if the Chula Vista Woods project does not proceed (reference 9). With the Chula Vista Woods project, the project applicant will be responsible for paying the cost of installing the pipe and OWD will pay for the cost of any excess in the size of the pipe, in the original case from 10" to 12" diameter pipe.

The draft EIR fails to even mention this OWD project even though OWD pointed it out in its worksheet. CEQA and its implementing regulations mandate a finding of potential significant impact so that the cumulative impacts of the project must be addressed. This deficiency must be cured.

CALCULATION OF OPEN SPACE

**23** The draft EIR improperly counts back yards as open space (Figure 4 and page 8 of the draft EIR). Cal. Gov. Code §65560(b) defines open space land as any parcel or area of land or water which is essentially unimproved and devoted to an open space use and which is designated on a local, regional or state plan as open space. It is a misuse of the term "open space" as well as misleading to apply it to yards in order for the project to appear to have a high percentage of open space.

WATER SUPPLY

**24** The draft EIR fails to disclose that the main water line to the project, proposed as 8" in diameter (EIR, page 40), will provide inadequate fire protection. Past project documents as well as OWD documents and representations reveal that the Chula Vista Fire Department required a minimum 10" diameter line in the old Saphire Street to serve a 55 unit development. Therefore, it follows that an 8" line will be inadequate to serve a 110 unit development as it would have been inadequate to serve a 55 unit development.

INADEQUATE DISTRIBUTION OF DRAFT EIR

The draft EIR has not been distributed to all interested or affected parties, nor is there any record in the Planning Department files that certain of these parties were even notified of the availability of the draft EIR. See draft EIR distribution list, attached hereto an Enclosure 3 and incorporated by reference herein. In particular, SDG&E requested opportunity to comment further in its letter of March 16, in response to the Notice of Preparation of the EIR. The Chula Vista



**23** Comment noted. The term "open space" in the EIR is not intended to refer to a particular definition in the California Government Code. It is used in a more generic sense since the open areas (or the space which will not be developed) will not be designated as "open space" on any local plans. Since no mitigation is dependent upon the total acreage of open space, we do not feel that the information was misleading or improperly used.

**24** Comment noted. An oversight is acknowledged on page 40. The following paragraph will replace the one preceeding the Potential Impacts heading:

"The project will connect to the water main located on the east side of the Greg Rogers park via a 12" main which also will connect into a line in Brandywine Street. The remaining on-site facilities will be 8" in size."

In the second sentence under Mitigation Measures, the words "eight inch" have been deleted. Thus, it is now confirmed that adequate fire protection can be provided, i.e. via the 12" water line.

Commumity Hospital was not even provided a Notice of Preparation of the EIR. Even the Otay Water District was not provided a copy of the draft EIR, according the the City's distribution list, in spite of the fact that the project proposes to construct its access road within the OWD water easement.

GENERAL RECOMMENDATIONS

Section 6.9 of the Chula Vista "Environmental Review Procedure" provides:

> If significant environmental issues are raised during the consulting process or during the public hearing, a response by the City of Chula Vista or a revision to the draft EIR text shall be prepared by the consultant or the ERC prior to the Planning Commission consideration of the final EIR. [Emphasis added].

United Enterprises, Inc. has pointed out and documented serious and substantial omissions and deficiencies in the draft EIR. Entire issues, some of which involve public safety and potential hazardous conditions, are not even mentioned in the draft EIR. Other issues and impacts are discussed where the analysis is incorrect or woefully inadequate.

**25** No reference is made in the EIR to any of the numerous items that United Enterprises has raised in the past on similar projects on the Chula Vista Woods site. These items, which have already been incorporated by reference, are available for review at the City of Chula Vista by the preparers of a revised EIR.

Since substantial inadequacies to the draft EIR exist, it is strongly recommended that the Planning Commission require that more information be required for the draft EIR, that the draft EIR be completely revised in accordance with Section 6.9 of the City's "Environmental Review Procedure", and that the revised Draft EIR undergo another public review period to consider the new and corrected information. United Enterprises, Inc. hereby reiterates its request for a copy of all documents, comments, responses, revised Draft EIR and Final EIR, and notice of all hearings regarding this project.

REFERENCES

1. County of San Diego, Design Policy Committee for Flood Control and Drainage, "Design and Procedure Manual", April 1979.

2. City of Chula Vista, "Environmental Review Proceedures", Resolution 11086, no date.

3. Bureau of Land Management and California Public Utilities Commission, "APS/SDG&E Interconnection Project, Draft Environmental Document", Appendix E, Page 11, August 1980.

4. Electric Power Research Institute, "Electrostatic and Elecromagnetic Effects of Ultra-high Voltage Transmission Lines", Report EPRI-EL-802, June 1978.



**25** Comment noted. See Response # 13.

5. County of San Diego, "Health Effects of High Voltage Transmission Lines", August 1981.

6. J.C. Keesey and F.S. Letcher, "Human Thresholds of Electric Shock at Power Transmission Frequencies", Archives of Environmental Health, Volume 21, Pages 547-552, 1970.

7. Johns Hopkins University, Applied Physics Laboratory, "Electrical Influence on the Environment from EHV Power TRansmission", April 1977: Reported in Michigan Public Service Commission, "Health and Safety Effects of EHV Electric Lines, a Review of the Literature", April 1979.

8. Michigan Public Service Commission, "Health and Safety Effects of EHV Electric Transmission Lines, a Review of the Literature", April 1979.

9. Otay Water District, Staff Presentation at District Hearing, March 23, 1981.

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The attachments submitted with these comments are on file at the City of Chula Vista Planning Department.

Questions from Planning Commission (7/25/84)

Comment:

**26** Commissioner Green: Please do a field check to better determine how many plants we are trying to protect. Have they been destroyed by RV activity?

Response:

Population levels of the two "significant" sensitive plant species Ambrosia pumilia and Cordylanthus orcuttianus were estimated on July 30, 1984. For Ambrosia pumila, we counted individual stems and estimated percent cover in each of 96, 0.5 x 1.0 meter square quadrants. These were located at regular intervals along a line placed through the long axis of the population. The average number of stems was 5.8 per 0.5 x 1.0 meter (standard deviation = 5.8, range = 0-29), and the average percent cover was 1.56 (standard deviation = 1.73, range = 1-10). We estimate the minimum sampled population area to be 1,053 square meters or 0.26 acres. Therefore, we estimate a minimum (we did not sample the smaller population area) of 12,215 stems on the property. Since many stems arise from the rhizome, this total represents somewhat less than 12,215 individual plants. This data is not really comparable to anything we know of; it appears Ambrosia pumila stands have not been studied in this way.

The 1977 biology report gives no estimate of the population extent or level, and although the site is "in a much more deteriorated condition" than Mr. Beauchamp recalls, it still supports a significant stand of Ambrosia pumila. The areal extent of the population is apparently large in comparison

to other populations we have seen or are aware of. Also, the visual density of the plant is higher than we have seen at any other site including the large Gillespie Field population which was lost to development.

For Cordylanthus orcuttianus we made a directed search of the population and counted 40 individuals. This is much lower than the "well over 400 plants" observed in 1977, this seeming diminishment "is not unexpected due to its annual habit and the depressed rainfall this past season" (Beauchamp letter to Moy). It may also have been impacted by disturbance.

Comment:

**27** Commissioner Green: Will an increase from almost non-existent traffic levels to approximately 1100 trips per day along East Naples Street have no significant impact? What is the design capacity for that area of East Naples?

Response:

Although the design ADT is 5,000 trips, the intersection capacity is what ultimately governs the actual ability of a street to handle any amount of traffic. The consulting traffic engineer conducted an intersection capacity analysis for the Oleander/Telegraph Canyon Road intersection and concluded that levels of services (LOS) would not fall below LOS C in the morning peak hour and LOS A in the evening peak hour. He also analyzed the possibility of a traffic signal being warranted for the Oleander/East Naples intersection and determined that traffec levels will not be anywhere near those required for a traffic signal. The City Traffic Engineer has concurred with these findings. Thus, it has been determined that no significant impacts will occur from the traffic generated from this project.

Comment:

**28** Commissioner Guiles: What is the capacity level of traffic for Oleander Avenue?

Response:

See Response # 27 .

Comment:

**29** Commissioner Guiles: Will there be an emergency access? What about a brush fire? Can the Fire Department get in? If the single road is blocked, how would the emergency be addressed?

Response:

An emergency access has been determined to be not necessary by the Fire Department. A brush fire is, of course, possible but most of the land surrounding the site has been disced and does not support dense, mature vegetation so chances of a major brush fire are considered minor. The chances of the road being blocked due to an emergency situation also is considered slight so significant impacts are not anticipated.

Comment:

**30** Tony Ambrose, HCH and Associates: Add to the EIR that the possibility of implementing a gravity flow sewer system through Greg Rogers park is being explored.

Response:

The following text has been added to page 37 as the last paragraph before the Potential Impacts section:

"The project proponent also is examining the possibility of designing a gravity flow system through Greg Rogers park. At this point, such studies are cursory and preliminary in nature. If at a later date, a gravity flow system is proposed, any environmental impacts determined to be significant will be addressed in an addendum to this EIR."