MEMORANDUM

To:	City of Chula Vista Planning Commissioners
From:	Thomas Edmunds Jr., Silvergate Development
Subject:	Response to Wittwer Parkin Comment Letter dated March 12, 2019
Date:	March 13, 2019
Attachments:	1. Bonita Glen Project Mitigated Negative Declaration Letter 2. Fiscal Year 2018 Growth Management Oversight Committee (GMOC) Questionnaire

City Staff received a comment letter on Tuesday March 12, 2019 from Nichols Whipps at Wittwer Parkin LLP, which represents the Southwest Regional Council of Carpenters. Their letter included comments regarding the Bonita Glen Mitigated Negative Declaration (MND) Response to Comments submitted on behalf of the Southwest Regional Council of Carpenters (Attachment 1). As a response to the received comment letter, the City has prepared this memorandum to fully address the comments that have been raised to date, and to ensure adequacy of the Final MND.

The comment letter received refers to the response provided by the City for comment N-31. The comment letter states that the City did not reference or analyze peak wet weather flows or indicate if its facilities are capable of handling such flows. This assertion is incorrect, as discussed below.

1. Peak Wet Weather Flows

The City did consider all potential impacts of the Project regarding peak wet weather flows to these facilities, as further discussed herein. The Project had an expert conduct a Sewer Capacity Analysis, prepared by Latitude 33 in April 2018 (provided as a reference in the MND), which looked at any potential impacts on the City's wastewater systems and was based on the City of Chula Vista Wastewater Master Plan (WMP). Based on Appendix 2 (Pipeline Information Per Basin) of the WMP, the proposed Project would connect wastewater flows to Pipe ID 1519 and Manholes 1513 and 1372, within the Sweetwater Basin. The Project's Sewer Capacity Analysis analyzed Project sewer flows under peak wet weather flow conditions. To calculate these sewer flows, a peaking factor of 2.5 times the Average Dry Weather Flow (ADWF) was applied to the Project, in accordance with the City's standard drawing, CVD-SW01. This 2.5 peaking factor is consistent and in line with industry standard to get Peak Wet Weather Flow. In fact, this is borne out by the exhibits provided in the comment letter, which used peaking factors ranging from 2-3 times the ADWF. Thus, the City did account for peak wet weather flows.

2. Wastewater Treatment Capacity

In response to the comment regarding the Project's effect of wastewater treatment capacity: The WMP provides review and evaluation of wastewater flows up to ultimate (2050) conditions. As stated in Chapter 2 of the WMP, the City is a participating agency in the City of San Diego owned and operated Metropolitan Water District of Southern California (METRO) system. Currently, all wastewater flows generated within the City basins excluding the

> peak wet weather flows [to stormwater facilities], not wastewater treatment or sewer facilities. The project's effect on the City's stormwater facilities is addressed in Section IX of the IS.

(Bonita Glen MND - Response to Comments, p. 134.)

This response not only shows the City's basic lack of understanding of wastewater treatment systems, but it also proves the City entirely failed to consider the direct, indirect, and cumulative impacts of the Project in relation to peak wet weather flows to these facilities, which typically range between two to five times the average dry weather flows to and through wastewater infrastructure. Because peak wet weather flows are the primary cause of harmful sewer system overflows in the United States, sewer facilities ***must*** plan to accommodate these flows above all else. Failure to account for peak wet weather flows could lead to or exacerbate regular sewer system overflows, which harm the environment, create health hazards, and violate the Clean Water Act.

Nowhere does the City consider or disclose the capacity of the various facilities that transport, store, and treat the City's and other jurisdictions' wastewater flows. The City's lack of understanding of this basic facet of wastewater treatment capacity is a serious concern from several standpoints, including wastewater infrastructure capacity, public health, state and federal law, and providing necessary information to the public and decision-makers pursuant to CEQA. Enclosed herein are several examples of local jurisdictions' evaluation of peak wet weather wastewater capacity, as well as additional background on this issue and the serious public safety concerns that result from peak wet weather sewer system overflows.

Very truly yours,
WITTWER PARKIN LLP

/s/
Nicholas Whipps

Encl.

DEXTER WILSON ENGINEERING, INC.

WATER • WASTEWATER • RECYCLED WATER

CONSULTING ENGINEERS

OVERVIEW OF SEWER SERVICE FOR OTAY RANCH VILLAGE 14 AND PLANNING AREA 16/19 - LAND EXCHANGE EIR ALTERNATIVE

February 2018

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CHAPTER 1

INTRODUCTION

This report provides an overview of sewer service for the Otay Ranch Village 14 and Planning Area 16/19 and recommended sewage facilities specific to the needs of the "Land Exchange Alternative". Sewer service is not currently provided to the Otay Ranch Proctor Valley Village 14 site; however, both the City of Chula Vista and the County of San Diego provide sewer service in the vicinity of the Land Exchange Alternative. This report will calculate sewage flows from the Land Exchange Alternative, outline fees to be paid for transportation and capacity in regional sewer facilities, and recommend onsite and offsite facilities necessary to accommodate project flows. Final design criteria and specifications for all sewage facilities shall comply with all County requirements and policies and will be subject to review and approval by the Director of Public Works and regulatory agencies. [SN1]

OVERVIEW AND BACKGROUND

This technical report provides a project level analysis of the Land Exchange Alternative (defined below) for inclusion in the Otay Ranch Village 14 and Planning Areas 16/19 Environmental Impact Report (EIR). The regional location is shown in Figure 1-1.

The Land Exchange Alternative is located within Otay Ranch Village 14 and Planning Areas 16 and 19 in the Proctor Valley parcel of Otay Ranch as shown on Figure 1-2. Village 14 and Planning Areas 16 and 19 are part of the larger Otay Ranch, an approximately 23,000-acre master-planned community in southern San Diego County designed as a series of Villages and Planning Areas.

The Land Exchange Alternative proposes 1,530 homes within a development footprint that is limited to Proctor Valley Village 14. The majority of Planning Areas 16 and 19 would be conveyed to MSCP and Otay Ranch RMP Preserve and would not be developed.

The following describes the major components and characteristics of the Land Exchange Alternative.

CHAPTER 3

PROJECTED SEWAGE FLOWS

Based on the sewage generation factors presented in Chapter 2 and the development plan for the Land Exchange Alternative, Table 3-1 provides the projected wastewater flows for the Land Exchange Alternative. Table 3-2 summarizes the projected average and peak dry weather flows.

TABLE 3-1
LAND EXCHANGE ALTERNATIVE
PROJECTED SEWAGE FLOWS

Neighborhood	Land Use Designation	Quantity	Sewage Generation Factor	Total Average Sewage Flow, GPD	EDU's
R-1	SF Residential	112 units	240 gpd/unit	26,880	112
R-2	SF Residential	72 units	240 gpd/unit	17,280	72
R-3	SF Residential	67 units	240 gpd/unit	16,080	67
R-4	SF Residential	57 units	240 gpd/unit	13,680	57
R-5	SF Residential	109 units	240 gpd/unit	26,160	109
R-6	SF Residential	75 units	240 gpd/unit	18,000	75
R-7	SF Residential	91 units	240 gpd/unit	21,840	91
R-8	SF Residential	47 units	240 gpd/unit	11,280	47
R-9	SF Residential	74 units	240 gpd/unit	17,760	74
R-10	SF Residential	127 units	240 gpd/unit	30,480	127
R-11	SF Residential	156 units	240 gpd/unit	37,440	156
R-12	SF Residential	44 units	240 gpd/unit	10,560	44
R-13	SF Residential	66 units	240 gpd/unit	15,840	66
R-14	SF Residential	60 units	240 gpd/unit	14,400	60
R-15	SF Residential	59 units	240 gpd/unit	14,160	59
R-16	SF Residential	191 units	240 gpd/unit	45,840	191
MF-1	MF Residential	69 units	192 gpd/unit	13,248	55.2
MU-1	Mixed Use	54 units	192 gpd/unit	10,368	43.2
P-1 to P-4	Public Park	13.5 ac	500 gpd/ac	6,750	28.1
PP-1 to PP-5	Private Park	6.9 ac	500 gpd/ac	3,450	14.4
FS-1	Public Safety	2.3 ac	1,500 gpd/ac	3,450	14.4
S-1	School	800 Students[1]	4.8 gpd/student	3,840	16
Total				**378,786**	**1,578**

[1] 800 students was assumed to be conservative and exceeds the requirements for this project.

Exhibit B

CHAPTER 3

WASTEWATER FLOWS

This Chapter presents the flow projections for the City, to be used in the analysis of the Collection System.

INTRODUCTION

When discussing sewage flows it is important to define some of the terminology commonly used to describe and analyze wastewater flows.

> *Average Daily Flow (ADF)* is the average daily wastewater flow over the course of a year and is generally obtained by averaging the mean monthly flows conveyed to the WWTP through the course of a year. In the case of this report the ADF is based on flow records at the WWTP for a 27 month period between January 2002 to March 2005. The ADF for the City of Morro Bay is 0.83 mgd.
>
> *Maximum Day Dry Weather Flow (MDDWF)* reflects the maximum day flow rate during the peak month of summer. This condition reflects the seasonal variation in dry weather flow. For the purposes of this study, the recent historical MDDWF is 1.5 mgd at the WWTP, and this occurred on the 4th of July, 2004.
>
> *Peak Hour Wet Weather Flow (PHWWF)* is the maximum flow rate that occurs in a single hour during wet weather (a significant rain storm event). This factor is derived from standard engineering methodology and judgment combined with actual flow monitoring data. This flow condition will govern the design of the sewage collection system and represents the maximum flow rate that the system must convey. As described in Chapter 5 of this report, PHWWF is derived by multiplying ADF times the diurnal peaking factor, then adding the wet weather flow component. The existing PHWWF for the Morro Bay flow component is approximately 2,600 gpm, or 3.8 mgd.
>
> *Peak Month Flow* is the average daily flow received at the WWTP over the course of the peak month. This flow is used to report WWTP flows to the Regional Water Quality Control Board. This peak month flow occurred in January 2005 and the value was 1.533 mgd for combined Morro Bay and Cayucos Sanitary District flows.

COLLECTION SYSTEM OVERVIEW

This section presents an overview of the various components of the collection system, including the City's 11 tributary basins and three lift stations.

Tributary Basins

The sewage collection system has eleven drainage basins: A01, A02, A03, A04, A05, A06, A07, B01, B02, B03, and TP, as shown on Figure 3-1. Basins A06, A05, A07, and A01c flow into basin A01a before entering the treatment plant. Basins B01, B02, and B03 flow into basin TP before entering the treatment plant. Basins A03 and A04 flow into A02 before entering the TP basin. Basin A01b flows into the TP basin without any upstream tributary flow. The flow chart depicting the relationship between basins is shown on Figure 3-2.

City of GALT

City of Galt

WASTEWATER COLLECTION SYSTEM MASTER PLAN

FINAL

MAY 2010

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The ADF is the total annual sewer flow divided by number of days in the year. For example, in 2006, the ADF was approximately 2.17 million gallons per day (mgd), and in 2007, the ADF increased to approximately 2.3 mgd. The average dry weather flow (ADWF) is the average daily flow occurring during the dry weather months (June to September for this report). In 2007, the ADWF was approximately 2.3 mgd.

The Peak Wet Weather Flow (PWWF), or Design Flow, is the highest sewer flow rate during a 1-hour period of the year. In general, the PWWF is typically 2.0 to 3.0 times greater than the ADF in cities throughout Central California. PWWF for this master plan was developed by reviewing data collected by the temporary flow monitoring program, historical WWTP plant records, and rainfall data for the Galt area. Based on this analysis the existing PWWF for the City is 7.01 mgd. This results in a peaking factor of 3.0, which is on the higher side of the typical range.

Developing an accurate estimate of the sewer flows is an important step in determining the size of collection system facilities, for both existing conditions and future developments. The future ADF projections were developed based on the land use projections as described in the City's General Plan. Per City direction, the demand projections provided in this Master Plan assume that undeveloped areas within the 100-year floodplain will not be developed in the future. However, floodplain areas within the City limits that are currently developed will remain developed.

A summary of the existing and future ADF is presented in Table ES.2. In addition to the projected average flows, Table ES.2 includes estimates for the Design Flows and peaking factors through build-out of the 2030 General Plan boundary. Based on these projections, it is anticipated that the City's build-out ADF, and design flow will approach 5.60 mgd, and 14.45 mgd respectively. As the City develops, it is anticipated that the Design Flow to ADF peaking factor will decrease from 3.0 to 2.6. The decrease in peaking factor results from new development and improved sewer construction methods, which result in a decrease in inflow and infiltration.

Table ES.2 Wastewater Flow Summary
Wastewater Collection System Master Plan
City of Galt

	Average Day Flow[2] (mgd)	Design Flow (mgd)	Peaking Factor
Existing[1]	2.30	7.01	3.0
General Plan[2] Boundary	5.60	14.45	2.6

Notes:
1. Based on year 2007 flows.
2. Based on land use and acreage from the City's General Plan and build-out of all land within the General Plan 2030 boundary, excluding undeveloped land within the 100-year floodplain.

4.2 WASTEWATER

4.2.1 Existing Conditions and Facilities

Demand

Municipal wastewater is generated by residential, commercial, and industrial sources. The quantity of wastewater generated is proportional to the population and the water use in the service area. Average wastewater flow per household is 288 gallons per equivalent dwelling unit (EDU) per day, while non-residential flow is estimated at 1,500 gallons per acre per day.[1] Past and present wastewater flows received by the City's Water Pollution Control Plant (WPCP) are shown in Table 4.2-1.

Table 4.2-1 Historical and Current Wastewater Flow

Year	Average Day Average Month Dry Weather Wastewater Flow (mgd)
1995	6.0
1996	6.0
1997	6.1
1998	7.2
1999	6.3
2000	6.0
2001	5.7
2002	6.5
2003	7.1
Average	6.3

Source: California Water Service Company, *Chico-Hamilton City District Urban Water Management Plan*, June 2004; Burgi, Richard, Assistant Civil Engineer, City of Chico Department of Public Works, personal communication with Quad Knopf, Inc., August 22, 2005.

Infrastructure

The City of Chico maintains facilities to convey, treat, and dispose of municipal wastewater generated within City limits. Wastewater in the City is either discharged to septic systems or routed to the sanitary sewer system. Wastewater that is discharged to septic systems eventually percolates into the aquifer underlying the City. Other than existing septic tank systems, community-level sewage disposal systems serve small subdivisions.[2]

Wastewater that is discharged to the City's system enters a gravity-flow sewer system, which consists of gravity sewers and pumping stations to collect wastewater from residential, commercial, and industrial customers. Figure 4.2-1 shows the City's entire wastewater collection and treatment system, including the City's lift stations and force mains. Wastewater flow is monitored at several locations throughout the City (see Figure 4.2-2).

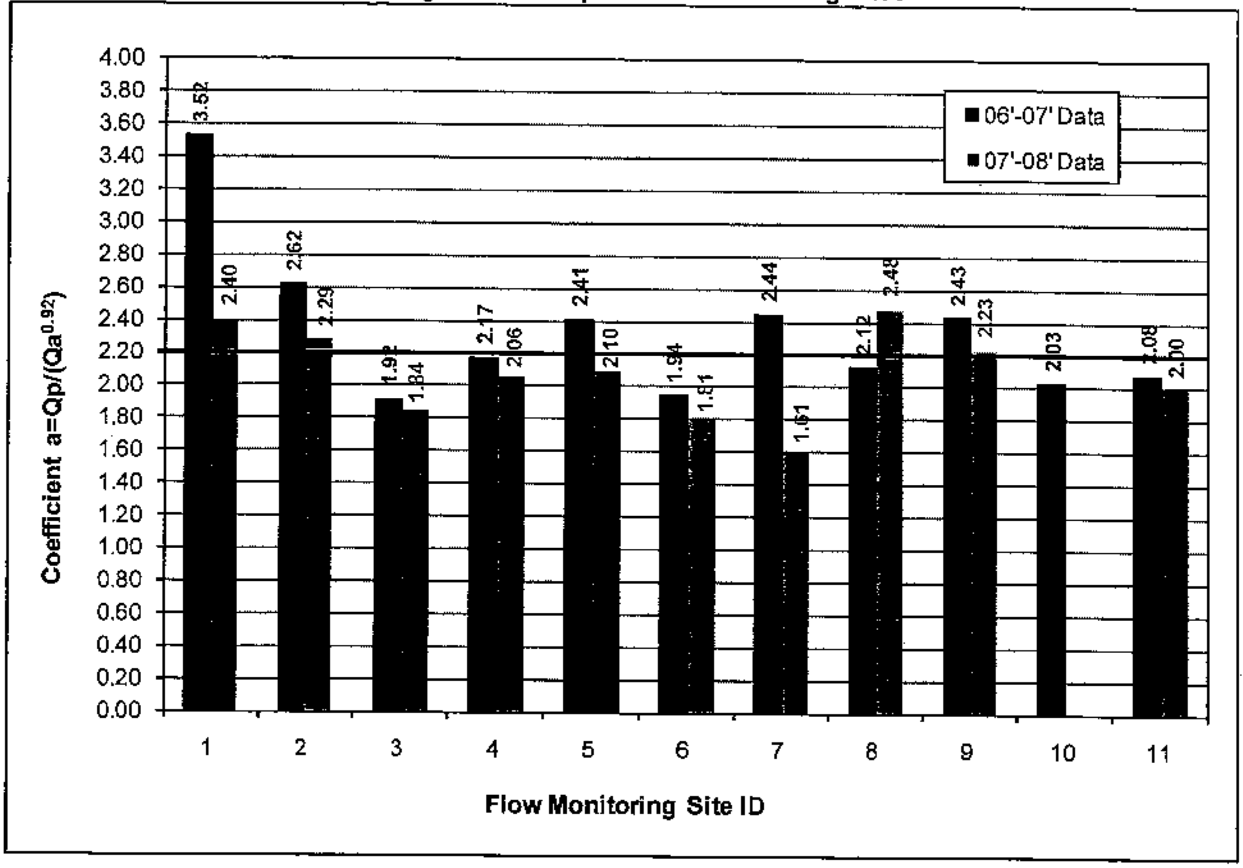
The existing sanitary sewer collection system pipelines are primarily constructed of vitrified clay. Pipe diameters range from 6 inches to 36 inches. The larger interceptors range in diameter from 10 inches to

1 Burgi, Richard, Assistant Civil Engineer, City of Chico Department of Public Works, personal communication with Quad Knopf, Inc., August 22, 2005.

2 Adapted from EIP Associates for the City of Chico, *Northwest Chico Specific Plan EIR, Infrastructure and Utilities*, 2005. MEA, p. 14-2.

Exhibit E

Figure 4-4
Peaking Relationships at Flow Monitoring Sites



Peak Wet Weather

The peak wet weather flow (PWWF) has two components: peak dry weather flow (PDWF) and rainfall dependent inflow/infiltration (I/I) as expressed by the following equation:

$$PWWF = PDWF + I/I$$

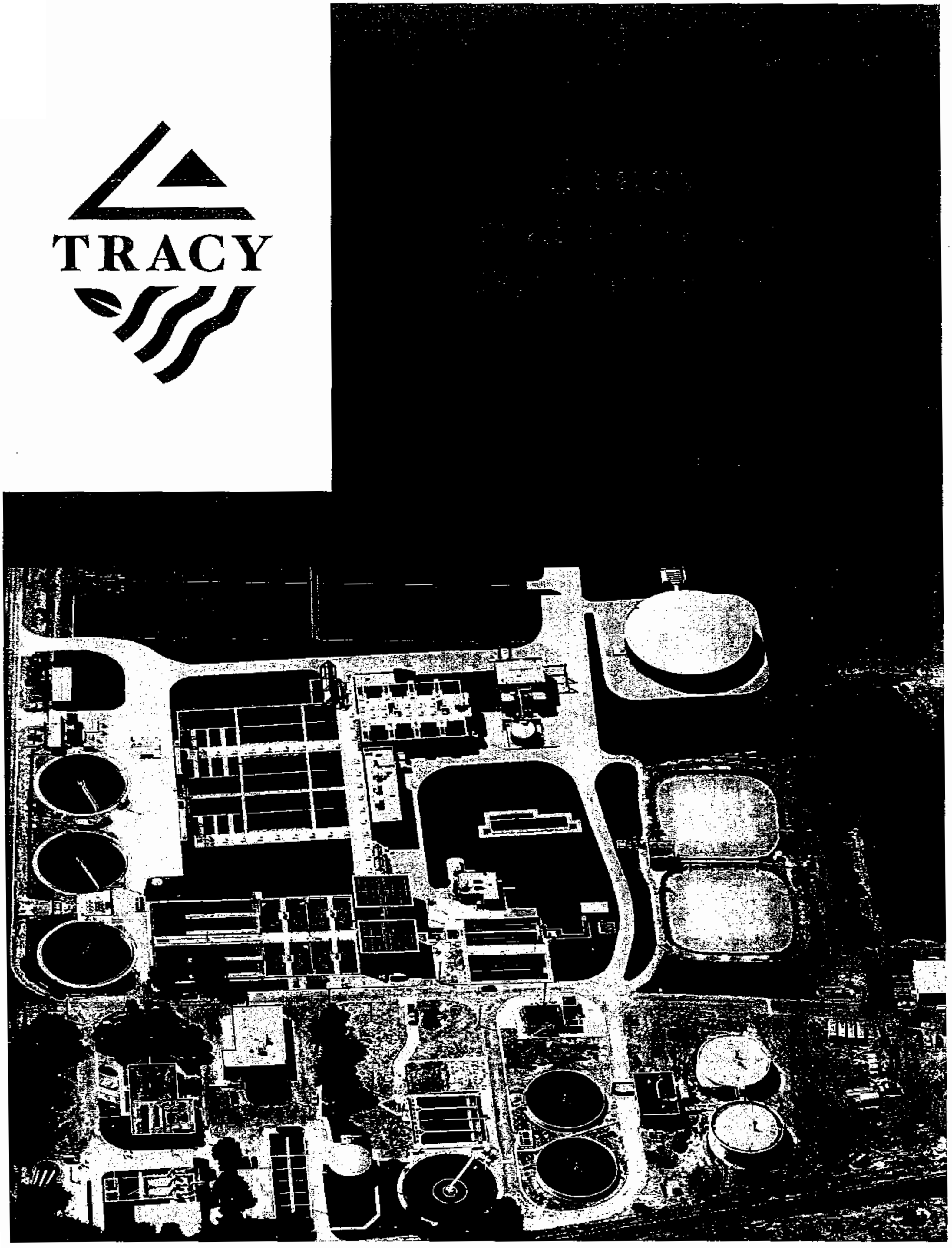
Inflow and infiltration is discussed further in Subsection 4-5.

It is recommended that the peak wet weather flow be estimated as the following:

$$PWWF = 1.40 \times PDWF$$

This will mean that the peak wet weather flow is estimated at approximately 3 times the average dry weather flow. Although the PWWF/PDWF factor of 1.40 may not cover all situations, it is not reasonable or feasible to design the sewer system to carry the flows that would result from the use of the larger ratios. Instead, it is recommended that the City concentrate on projects such as replacing manhole covers, installing plugs in manhole covers, and replacing or relining cracked pipes to reduce inflow and infiltration.

TRACY



CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL VALLEY REGION

RESOLUTION NO. R5-2003-0129

AMENDING WASTE DISCHARGE REQUIREMENTS
ORDER NO. 5-01-044

NPDES NO. CA0077691

CITY OF VACAVILLE
EASTERLY WASTEWATER TREATMENT PLANT
ELMIRA, SOLANO COUNTY

The California Regional Water Quality Control Board, Central Valley Region, (hereafter Regional Board) finds that:

1. On 15 March 2001, the Regional Board adopted Waste Discharge Requirements (WDRs) Order No. 5-01-044, NPDES No. CA0077691, prescribing WDRs for the City of Vacaville (hereafter Discharger) Easterly Wastewater Treatment Plant (EWWTP), Solano County incorporating an increase in discharge quantity and a plant expansion.

2. The Discharger owns and operates the EWWTP, a publicly owned treatment works (POTW), and provides sewerage service to the City of Vacaville and the unincorporated community of Elmira. Treated municipal wastewater is discharged to Old Alamo Creek, which is tributary to New Alamo Creek, tributary to Ulatis Creek, and tributary to Cache Slough, all waters of the United States, at the point, latitude 38° 20' 50" and longitude 121° 54' 37" (outfall 001). The Discharger is constructing a plant expansion (Phase I) increasing its existing design average dry weather flow (ADWF) of 10 mgd to 15 mgd. In addition, as a result of "Value Engineering", the Discharger designated a replacement outfall location. The new outfall will be 892 feet east (downstream) of the existing outfall (centerline to centerline), at the point, latitude 38° 20' 48" and longitude 121° 54' 06". The replacement outfall is expected to be put-in-service during the spring of 2004.

3. The treatment system consists of head works (screw pumps, bar screens, grit chamber), primary clarifiers, activated sludge reactors, secondary clarifiers, a chlorine contact chamber, dechlorination, sludge thickeners, sludge digesters, sludge drying beds/lagoons and a stabilization pond.

4. The EWWTP lacks sufficient secondary treatment capacity for secondary treatment of all inflows during peak wet weather events. In such circumstances, a portion of the flow is, after primary treatment, routed around secondary treatment facilities and recombined with secondary effluent prior to chlorination, dechlorination and discharge. This bypass practice is often referred to as effluent "blending."

EPA

Proposed EPA Policy on Permit Requirements for Peak Wet Weather Discharges from Wastewater Treatment Plants Serving Sanitary Sewer Collection Systems

December 2005

EPA seeks comments on a proposed policy regarding implementing requirements for wet weather blending at municipal publicly owned wastewater treatment plants serving sanitary sewer collection systems. The proposed policy seeks to ensure that all feasible solutions are used by local governments when peak wet weather flows to the wastewater treatment plant exceed the treatment capacity of secondary treatment units. The proposed policy applies only to publicly owned wastewater treatment plants that serve sanitary sewers and, during wet weather, divert a portion of the flow around secondary treatment units and recombine the flow with flow from the secondary treatment units. It is EPA's goal to ensure that all feasible solutions are used by local governments when addressing problems related to heavy wet weather flows and to improve treatment of wastewater to protect human health and the environment.

Background

Many municipal sewage treatment systems experience problems during heavy downpours when flows to the wastewater treatment plant exceed the treatment capacity of existing secondary treatment units. Many municipalities manage peak wet weather flows by routing some peak flow around traditional biological secondary treatment units, blending the rerouted flow with the flow receiving secondary treatment; and disinfecting and discharging. In an attempt to address this issue, EPA proposed a policy addressing National Pollutant Discharge Elimination System (NPDES) permit requirements for municipal wastewater treatment plants (serving sanitary sewers) during wet weather conditions in November 2003. The 2003 proposed policy is intended to provide clarity about managing peak wastewater flows that are sometimes diverted from secondary treatment unit processes during significant wet weather events. EPA received more than 98,000 public comments. EPA stopped working on the proposal in May 2005 in order to review different approaches and new information.

In October 2005, the Natural Resources Defense Council (NRDC) and the National Association of Clean Water Agencies (NACWA) developed joint recommendations to address peak wet weather flow diversions at wastewater treatment plants that are serving sanitary sewer collection systems. Their approach describes limited circumstances when NPDES permits can approve anticipated wet weather blending as a "bypass" at publicly owned treatment work (POTW) treatment plants serving sanitary sewers. Their recommended policy would apply only to blended discharge from sewage treatment plants serving sanitary sewer collection systems. It would not apply to overflows in collection systems; dry weather diversions; diversions around primary or tertiary treatment units; or diverted flows that are not recombined with flow from the secondary treatment units prior to discharge.

EPA's proposed policy is informed by and reflects those joint recommendations.

5-4-2006

Impacts of Rainfall Events on Wastewater Treamtent Processes

Erin K. McMahan
University of South Florida

Chapter One
Introduction

Stormwater pollution is considered a point source and regulated by authorized state agencies under the National Pollutant Discharge Elimination System (NPDES) (EPA, 2003; Rosenbaum, 2002). When precipitation falls onto the ground and impervious surfaces, such as a parking lot, rooftop, or street, it drains as stormwater runoff. In an area with a high degree of impervious cover, such as in an urban area, stormwater runoff can accumulate microbial and chemical pollutants. If not managed effectively, stormwater runoff can result in the contamination of surface water and groundwater (Cunningham and Saigo, 2001).

Industrial facilities, municipal separate storm sewer systems (MS4s), and construction activities require permits that control for the discharge of stormwater generated on-site (EPA, 2004c). However, stormwater runoff that enters a publicly-owned treatment works (POTW) becomes the responsibility of the POTW (or municipal wastewater treatment facility) (EPA, 2002b). If the POTW does not have adequate capacity to treat the additional pollutant loading generated by the stormwater contribution to the wastewater flow, there is a short-term risk that the treatment facility will be in non-compliance with the NPDES permit requirements for effluent discharge (EPA, 2002b). Extreme rainfall or wet weather events[1] can generate large quantities of stormwater, which can enter the wastewater collection system via sewer manholes, ground infiltration, faulty connections, and leaky or broken pipes (Droste, 1997). These

[1] The terms "extreme rainfall event" and "peak wet weather event" refer to storm events that exceed the average precipitation rates for a particular region, and will be used interchangeably for the purpose of this paper

Inflow and infiltration (I/I) are two ways that stormwater can enter the collection system carrying wastewater to a treatment facility (WEF, 1999; Dr. Levine Personal Communication, 2005). Inflow and infiltration can occur during heavy rainfall events when large amounts of stormwater flows through manholes, cracked and/or leaking pipes, and improper connections (WEF, 1999; Dr. Levine Personal Communication, 2005).

The majority of wastewater collection systems in the United States were constructed in the early 20th century, and through maintenance and retrofitting, now consist of a combination of older and more recent technologies (Tafuri and Selvakumar, 2002). Almost 75% of the 600,000-800,000 miles of sewer pipelines in the United States function at 50% of their ability or less (Tafuri and Selvakumar, 2002; ASCE, 1994). The Urban Institute (1981) concluded that close to 30,000 major main breaks and 300,000 pipeline stoppages/clogs occur annually, and will continue to increase at a rate of approximately 3% annually (Tafuri and Selvakumar, 2002). Over 50% of these stoppages are caused by tree roots that perforate the sewer pipelines (Tafuri and Selvakumar, 2002).

The Combined Sewer Overflow (CSO), Blending, and Peak Wet Weather policies are the current and recently proposed stormwater policies related to the impacts of wet weather events on wastewater treatment performance. The policy which regulates a POTW depends on whether the facility is served by CSS or SSS. The CSO policy addresses facilities with CSS, while the Blending and Peak Wet Weather policies regulate POTWs with SSS.

The facilities subject to these policies are regulated by the NPDES, which sets uniform effluent limits for dischargers of toxic pollutants, wastewater, and other substances that potentially threaten water quality (Adler, Landman, and Cameron, 1993; Rosenbaum, 2002), and permits discharges for point sources based on the best available technology (BAT) (Rosenbaum, 2002; Smith, 2004). The United States Environmental Protection Agency (US EPA) has given authorized states approval to permit their own point sources in accordance with the NPDES (Cunningham and Saigo, 2001; EPA, 2003;

GROWTH MANAGEMENT OVERSIGHT COMMISSION (GMOC)

Threshold Standard Compliance Questionnaire

Sewer – FY 2018

Review Period:

July 1, 2017 – June 30, 2018 and 5-Year Forecast

CHULA VISTA MUNICIPAL CODE 19.09.040

D. SEWER.

1. GOAL.

To provide a healthful and sanitary sewer collection and disposal system for the residents of the City of Chula Vista, consistent with the City's wastewater master plan.

2. OBJECTIVE.

Individual projects will provide necessary improvements consistent with City engineering standards. Treatment capacity should be acquired in advance of demand.

3. THRESHOLD STANDARDS.

a. Existing and projected facility sewage flows and volumes shall not exceed City engineering standards for the current system and for budgeted improvements, as set forth in the Subdivision Manual.

b. The City shall annually ensure adequate contracted capacity in the San Diego Metropolitan Sewer Authority or other means sufficient to meet the projected needs of development.

4. IMPLEMENTATION MEASURES.

a. The City Engineering Department shall annually gather and provide the following information to the GMOC:

i. Amount of current capacity in the Metropolitan Sewer System now used or committed and the status of Chula Vista's contracted share;

ii. Ability of sewer facilities and Chula Vista's share of the Metropolitan Sewer System's capacity to absorb forecasted growth over the next five years;

iii. Evaluation of funding and site availability for budgeted and projected new facilities; and

iv. Other relevant information.

b. Should the GMOC determine that a potential problem exists with meeting the projected needs of development with respect to sewer, it may issue a statement of concern in its annual report.

PREPARED BY:

Name: Beth Gentry/ Frank Rivera

Title: Sr. Civil Engineer – Wastewater Engineering/ Principal Civil Engineer

Date: 10/5/18