

2.2 Agricultural and Forestry Resources

This section of the environmental impact report (EIR) analyzes the potential for Otay Ranch Village 14 and Planning Areas 16/19 (Proposed Project) to impact agricultural resources. The agricultural analysis characterizes the existing setting as it pertains to agricultural resources, including any historical farming or grazing practices on the property and the Project Area's farmland suitability based on the categories established by the California Department of Conservation. The analysis is focused on consistency with the goals established in the County of San Diego (County) General Plan (County of San Diego 2011) and the Otay Ranch General Development Plan/Otay Subregional Plan (Otay Ranch GDP/SRP) (City of Chula Vista and County of San Diego 1993a).

This section of the EIR tiers from the Otay Ranch GDP/SRP Final Program EIR (Otay Ranch PEIR) (City of Chula Vista and County of San Diego 1993b), because potential impacts to agricultural resources due to development in the entire Otay Ranch area, including the Project Area, were analyzed as part of the Otay Ranch PEIR. The Otay Ranch PEIR determined that impacts to agricultural resources would be significant. As a result, the Otay Ranch PEIR included mitigation measures to reduce the significant impacts, including preparation of an Agricultural Plan for future specific plans that affect on-site agricultural resources. The Otay Ranch PEIR determined that, even with implementation of the mitigation measures, the permanent loss of agricultural land was a significant and unavoidable impact within the Otay Ranch area; however, the County Board of Supervisors determined that the significant impacts identified in the Otay Ranch PEIR were acceptable because of specific overriding considerations.

The specific overriding considerations are as follows:

- Conveyance of natural open space,
- Provision of housing necessary to meet projected long-term regional housing needs,
- The net positive fiscal impact the Proposed Project would provide for the City of Chula Vista and the County of San Diego,
- Design patterns that minimize the adverse impacts of development on air quality and congestion,
- The Proposed Project's unique land plan, which would improve mobility and provide social benefits, and
- The opportunity to comprehensively plan development that meets the regions need for jobs, infrastructure, and environmental preservation.

The Proposed Project would not result in any significant agricultural resource impacts beyond those already disclosed and analyzed in the Otay Ranch PEIR.

2.2.1 Existing Conditions

2.2.1.1 Environmental Setting

Historically, the Project Area has been used for dry farming, as well as cattle and sheep grazing. Crop production was limited to hay and grains due to limited water availability. Although cultivation and cattle grazing activities are currently permitted, these activities are no longer occurring within the Project Area. Land used for agricultural activities in areas surrounding the Project Area has decreased over the years.

Farmland in the surrounding area has been converted to urban uses over time due to the increased land value such uses tend to generate. In addition, property taxes often exceed income from agricultural production. The high cost of importing water for irrigation has also resulted in many agricultural activities becoming cost prohibitive. These factors, coupled with the fact that the Wildlife Agencies (i.e., California Department of Fish and Wildlife and U.S. Fish and Wildlife Service) requested a cessation of agricultural activities to better protect the surrounding Preserve areas, have contributed to the cessation of large-scale agricultural activities in the Project Area since 1999. Since that time, only periodic and limited farming and grazing activities have continued in the Otay Ranch, but not within the Project Area.

2.2.1.2 Regulatory Setting

State

Department of Conservation Farmland Mapping and Monitoring Program

In response to a critical need for assessing the location, quality, and quantity of agricultural lands and conversion of these lands over time, the California Department of Conservation established the Farmland Mapping and Monitoring Program (FMMP) in 1982. The goal of the FMMP is to provide consistent and impartial data to decision makers for use in assessing the suitability of agricultural lands in the State of California. The FMMP classifies land into five mapping categories based on soil and climatic conditions: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land. In addition, the FMMP identifies nonagricultural lands as either Urban and Built-Up Land or Other Land. Important Farmland Maps are updated every 2 years.

The FMMP identifies farmlands as follows:

- **Prime Farmland.** Prime Farmland has the best combination of physical and chemical features able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agriculture production at some time during the 4 years prior to the mapping date.
- **Farmland of Statewide Importance.** Farmland of Statewide Importance is similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the 4 years prior to the mapping date.
- **Unique Farmland.** Unique Farmland consists of lesser quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated, but it may include non-irrigated orchards or vineyards, as found in some climatic zones in California. Land must have been cropped at some time during the 4 years prior to the mapping date.
- **Farmland of Local Importance.** Land of importance to the local agricultural economy, as determined by each county's board of supervisors and a local advisory committee. The following lands are to be included in the Farmland of Local Importance category:
 - All farmable lands within San Diego County that do not meet the definitions of Prime, Statewide, or Unique but are currently irrigated pasture or non-irrigated crops
 - Non-irrigated land with the soils qualifying for Prime Farmland or Farmland of Statewide Importance
 - Lands that would have Prime or Statewide designation and have been improved for irrigation but are now idle
 - Lands with a General Plan Land Use designation for agricultural purposes
 - Lands that are legislated to be used only for agricultural (farmland) purposes
- **Grazing Land.** Land on which the existing vegetation is suited to the grazing of livestock. The minimum mapping unit for Grazing Land is 40 acres.

Williamson Act

The California Land Conservation Act of 1965, commonly referred to as the Williamson Act, enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use. In return, landowners receive property tax assessments that are much lower than normal because they are based upon

farming and open space uses as opposed to full market value. The goal of the Williamson Act is to encourage the preservation of California's agricultural land and to prevent its premature conversion to urban uses.

California Public Resources Code

The California Public Resources Code defines "forest land" and "timberland" as follows:

- "Forest land" is land that can support 10% native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits (California Public Resources Code, Section 12200(g)).
- "Timberland" means land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees. Commercial species shall be determined by the board on a district basis after consultation with the district committees and others (California Public Resources Code, Section 4526).

California Government Code

California Government Code defines "timberland" zoned "timberland production" as follows:

"Timberland production zone" or "TPZ" means an area which has been zoned pursuant to Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, as defined in subdivision (h). With respect to the general plans of cities and counties, "timberland preserve zone" means "timberland production zone" (California Government Code, Section 51100 et seq.).

Local

County of San Diego Board of Supervisors Policy I-38 - Agricultural Preserves

This policy establishes procedures for implementing Williamson Act contracts in the County and for establishing agricultural preserves. This Board policy also outlines the criteria for the establishment, modification, and disestablishment of an agricultural preserve. This legislation and these policies include Williamson Act contracts.

County of San Diego General Plan

Agricultural resources are covered in both the Land Use Element and the Conservation and Open Space Element of the County's General Plan (County of San Diego 2011).

Land Use Element

Despite numerous constraints to agriculture, such as high water and land costs, the County has a robust agricultural economy. Agriculture contributes to the character of the County, particularly Semi-Rural and Rural Lands, supplying County residents with local agricultural products and contributing significantly to the local economy. A goal of the County's General Plan is the preservation of local agriculture, which includes a diverse mix of high value commodities and takes advantage of a long—in some cases year-round—growing season. Incompatibility of adjacent land uses can present yet another constraint to the viability of local agriculture. Because residential and other potentially incompatible development occurs in traditionally agricultural areas, careful attention should be given to the compatibility of these nonagricultural uses, and to site design techniques that would reduce or avoid potential conflicts. Applicable General Plan policies include the following (County of San Diego 2011):

- **Policy LU-5.3: Rural Land Preservation.** Ensure the preservation of existing open space and rural areas (e.g., forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, and groundwater recharge areas) when permitting development under the Rural and Semi-Rural Land Use Designations. Open space and rural lands are primary areas that provide carbon sequestration benefits for the Region.
- **Policy LU-6.4: Sustainable Subdivision Design.** Require that residential subdivisions be planned to conserve open space and natural resources, protect agricultural operations including grazing, increase fire safety and defensibility, reduce impervious footprints, use sustainable development practices, and, when appropriate, provide public amenities consistent with the applicable community plan. [See applicable community plan for possible relevant policies.]
- **Policy LU-7: Agricultural Conservation.** A land use plan that retains and protects farming and agriculture as beneficial resources that contribute to the County's rural character.
- **Policy LU-7.1: Agricultural Land Development.** Protect agricultural lands with lower-density land use designations that support continued agricultural operations.

Conservation and Open Space Element

The County of San Diego is the only major urban county with a farm gate value¹ consistently ranked among the top 10 agricultural counties (ranked number 8 for several years) in California. The County has the fourth-highest number of farms of any county in the country and third-highest number of farms of any county in California. Agriculture is the fifth-largest component of the County's economy. Agriculture in the County provides an array of economic, environmental, and social benefits that contribute to the quality of life in the region. Agriculture also provides a valuable open space resource and plays a critical role in regional wildlife conservation by providing usable open space corridors and habitat for some species. Applicable General Plan policies include the following (County of San Diego 2011):

- **Policy COS-6.2: Protection of Agricultural Operations.** Protect existing agricultural operations from encroachment of incompatible land uses by doing the following:
 - Limiting the ability of new development to take actions to limit existing agricultural uses by informing and educating new projects as to the potential impacts from agricultural operations
 - Encouraging new or expanded agricultural land uses to provide a buffer of non-intensive agriculture or other appropriate uses (e.g., landscape screening) between intensive uses and adjacent non-agricultural land uses
 - Allowing for agricultural uses in agricultural areas and designing development and lots in a manner that facilitates continued agricultural use within the development
 - Requiring development to minimize potential conflicts with adjacent agricultural operations through the incorporation of adequate buffers, setbacks, and project design measures to protect surrounding agriculture
 - Supporting local and state right-to-farm regulations
 - Retain or facilitate large and contiguous agricultural operations by consolidation of development during the subdivision process
 - Discourage development that is potentially incompatible with intensive agricultural uses, including schools and civic buildings where the public gather, daycare facilities under private institutional use, private institutional uses (e.g., private hospitals or rest homes), residential densities higher than two dwelling units per acre, and offices and retail commercial

¹ "Farm gate value" is the net value of the product when it leaves the farm, after marketing costs have been subtracted.

- **Policy COS-6.3: Compatibility with Recreation and Open Space.** Encourage siting recreational and open space uses and multi-use trails that are compatible with agriculture adjacent to the agricultural lands when planning for development adjacent to agricultural land uses.

Otay Ranch General Development Plan/Subregional Plan

The Otay Ranch GDP/SRP establishes goals, objectives, and policies related to the protection of agricultural resources (City of Chula Vista and County of San Diego 1993a). Although these are general in nature, they are intended to be applicable to the entire Otay Ranch GDP/SRP area, including the Project Area. The Otay Ranch PEIR concluded that the loss of agricultural lands is a significant and unmitigable impact, even with implementation of mitigation that requires an Agricultural Plan to be prepared by each project applicant prior to approval of a Sectional Planning Area Plan affecting on-site agricultural resources.

As stated in the Otay Ranch PEIR, an Agricultural Plan must include the following (City of Chula Vista and County of San Diego 1993b):

1. Indication of the type of agricultural activity allowed as an interim use; buffering guidelines to prevent land use interface impacts shall be prepared. Buffering measures shall include:
 - a. A 200-foot distance between property boundaries and agricultural operations.
 - b. If permitted interim agricultural uses require the use of pesticide, then limits shall be set as to the time of day and the type of pesticide application that may occur.
 - c. Use of vegetation along the field edges adjacent to development that can be used for shielding.
 - d. Notification of adjacent property owners of potential pesticide applications.
 - e. Use of fencing.
2. Landscaping and buffering guidelines shall be developed for the areas planned adjacent to continuing agricultural uses (off site).
3. In the Otay Valley Parcel near the proposed composting facilities and Bird Ranch where prime soils are located, a demonstration agricultural area shall be set aside. Schools within the Otay Ranch property shall be allowed to promote educational activities in regard to agriculture through the use of the agricultural demonstration area.
4. Agricultural activity and the keeping of animals shall be allowed within the large, low density lots planned along the northern edge of the Proctor Valley Parcel as allowed within the Jamul/Dulzura Subregional Plan. Development plans for this area shall contain

landscaping and buffering guidelines to prevent nuisance impacts related to noise and odor from occurring between adjacent internal residential uses.

Otay Ranch Resource Management Plan

The Otay Ranch Resource Management Plan (RMP) contains several objectives and policies related to agriculture. The single unifying goal of the Otay Ranch RMP is to establish an open space system that will become a permanent Preserve dedicated to the protection and enhancement of environmental resources. The Multiple Species Conservation Program (MSCP) Preserve Plan will provide opportunities for creation of demonstration agricultural uses.² Demonstration agricultural uses must be compatible with Otay Ranch RMP policies and standards for resource protection and enhancement. In conformance with the Otay Ranch RMP, a range management plan for Otay Ranch was subsequently prepared. In general, the range management plan recommendations and implementing actions provide for ongoing managed grazing activities on conveyed lands if the activity is shown not to negatively affect biological resources.

2.2.2 Analysis of Project Effects and Determination as to Significance

The County of San Diego has developed Guidelines for Determining Significance and Report Format and Content Guidelines: Agricultural Resources (Agricultural Report Guidelines) (County of San Diego 2015). An affirmative response to, or confirmation of, any one of the following guidelines will generally be considered a significant impact to agricultural resources as a result of Proposed Project implementation, in the absence of scientific evidence to the contrary. There are four categories of potential impacts included in the guidelines that could pertain to the Proposed Project.

2.2.2.1 Impacts to Important On-Site Agricultural Resources

Guidelines for the Determination of Significance

For the purpose of this EIR, the County's Agricultural Report Guidelines (2015) apply to both the direct impact analysis and the cumulative impact analysis. A significant impact to important on-site agricultural resources would result if (County of San Diego 2015, Section 4.2.1):

- The project site has important agricultural resources as defined by the LARA [Local Agricultural Resources Assessment] Model.
- The project would result in the conversion of agricultural resources that meet the soil quality criteria for Prime Farmland or Farmland of Statewide Importance, as defined by the FMMP.
- The project would substantially impair the ongoing viability of the site for agricultural use.

² Areas that would provide an opportunity to demonstrate various agricultural techniques.

Analysis

The Proposed Project would not convert any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to nonagricultural use, as shown on the maps prepared pursuant to the FMMP by the California Department of Conservation. However, the Proposed Project would convert approximately 62.4 acres designated as Farmland of Local Importance and 635.6 acres of Grazing Land to residential uses, thereby precluding it from potential agricultural use in the future. Although the Project Area is no longer used for crops or grazing (and has not been used as such since 1999), the conversion would contribute to an incremental loss of Farmland of Local Importance and Grazing Land. In the County, agricultural resources—and therefore the significance of impacts to such resources—are evaluated through the LARA Model, which identifies three required factors of water, climate, and soil quality:

- **Water.** Analysis of water indicates the water factor as “low,” since the Project Area is underlain by alluvial and sedimentary aquifer and is not located within the San Diego County Water Authority Service area (County of San Diego 2006a). Additionally, no groundwater wells were detected beneath the Project Area.
- **Climate.** The Project Area is within Sunset Climate Zone 23, and the climate factor would be rated “high,” pursuant to the County guidelines (County of San Diego 2006b).
- **Soil Quality.** Analysis of soil quality indicates the soil quality factor as “low,” because the Project Area does not have 10 or more acres of contiguous Prime Farmland or Statewide Importance Soils and the Soil Quality Matrix value was 0.09, which is less than the LARA Model threshold of 0.33 (County of San Diego 2006c; DOC 2010).

See also Table 2.2-1, LARA Model Factor Ratings. The combination of these factors’ ratings is evaluated pursuant to the matrix presented in Table 2.2-2, Interpretation of LARA Model Results. The LARA Model analysis determined that the Project Area is not an important agricultural resource because it falls within Scenario 5 in Table 2.2-2, with the required factor of water resources and soil quality receiving a “low” rating. Scenario 5 states that when at least one factor is rated low importance, then the site is not an important agricultural resource. Thus, because the Proposed Project would have no direct impacts to on-site important agricultural resources and it would not substantially impair the ongoing viability of the Project Area for agricultural use, the impacts to agricultural resources would be **less than significant**.

2.2.2.2 Indirect Impacts to Agricultural Resources

Guidelines for the Determination of Significance

For the purpose of this EIR, the County’s Agricultural Report Guidelines (2015) apply to both the direct impact analysis and the cumulative impact analysis.

A significant indirect impact to agricultural resources would result if (County of San Diego 2015):

- The project proposes a non-agricultural land use within one-quarter mile of an active agricultural operation or land under a Williamson Act Contract (Contract) and as a result of the project, land use conflicts between the agricultural operation or Contract land and the proposed project would likely occur and could result in conversion of agricultural resources to a non-agricultural use.
- The project proposes a school, church, day care or other use that involves a concentration of people at certain times within one mile of an agricultural operation or land under Contract and as a result of the project, land use conflicts between the agricultural operation or Contract land and the proposed project would likely occur and could result in conversion of agricultural resources to a non-agricultural use.
- The project would involve other changes to the existing environment, which due to their location or nature, could result in the conversion of off-site agricultural resources to a non-agricultural use or could adversely impact the viability of agriculture on land under a Williamson Act Contract.

Analysis

The Project Area is not located on or within 0.25 miles of an active agricultural operation or land under a Williamson Act Contract; therefore, impacts associated with the conversion of land under a Williamson Act Contract would be less than significant. The Proposed Project does not propose any use that involves a concentration of people at certain times within 1 mile of an agricultural operation or land under a Williamson Act Contract. Additionally, the Proposed Project would not result in the conversion of off-site agricultural resources.

The Project Area includes 62.4 acres of land designated as Farmland of Local Importance and 635.6 acres of land designated as Grazing Land. As discussed in the Otay Ranch PEIR, the County's policy and ordinance pertaining to agricultural land do not directly prevent the conversion of agricultural land to urban uses. The County has established criteria to analyze properties with existing agricultural uses for their agricultural significance. The LARA Model analysis determined that the Project Area is not an important agricultural resource because it falls within Scenario 5 in Table 2.2-2, with the required factor of water resources and soil quality receiving a "low" rating. Scenario 5 states that when at least one factor is rated low importance, then the site is not an important agricultural resource. Thus, the LARA Model analysis determined that the Project Area is not an important agricultural resource in the County.

As indicated in Section 2.2.2.1, the Project Area is located in Sunset Climate Zone 23, which is one of Southern California's coastal climates. The Proposed Project does not include prime

agricultural soils and is no longer used for crops or grazing land. Although the Proposed Project would result in the conversion of approximately 62.4 acres of land designated as Farmland of Local Importance to residential uses, the LARA Model analysis determined that the Project Area is not an important agricultural resource. Consistent with the findings in the Otay Ranch PEIR, the incremental loss of Farmland of Local Importance as a result of the Proposed Project would be a **potentially significant impact (Impact AG-1)**.

In addition, the Proctor Valley Road North Option described in Chapter 1, Project Description, includes the addition of two dedicated bike lanes (one on each side of the road) along the portion of Proctor Valley Road from Street AA in the North Village to Echo Valley Road, which results in an increased right-of-way width from 40 feet to 64 feet. If chosen by the Board of Supervisors, the Proctor Valley Road North Option would result in the loss of approximately 0.05 acres of Farmland of Local Importance and approximately 0.43 acres of Grazing Land. Although the Proctor Valley Road North Option would increase the conversion of Farmland of Local Importance and Grazing Land to non-agricultural uses, this would be an incremental loss and impacts to agricultural resources would remain less than significant.

If chosen by the Board of Supervisors, the Preserve Trails Option would result in the loss of approximately 0.6 acres of Farmland of Local Importance and approximately 0.7 acres of Grazing Land. Although the Perimeter Trail Option would increase the conversion of Farmland of Local Importance and Grazing Land to non-agricultural uses, this would be an incremental loss and impacts to agricultural resources would remain less than significant.

There is potential for interim agricultural activity to occur within the Project Area, pursuant to mitigation measure **M-AG-1** (see Section 2.2.5, Mitigation), which could potentially result in land use conflicts with adjacent ownership areas. The Otay Ranch PEIR identified the potential for land use incompatibility as a short-term impact due to noise, odor, rodents, and chemical applications associated with agricultural activities adjacent to developed areas in the vicinity of the Project Area. As required by the approved Otay Ranch PEIR, the applicant has prepared an Agricultural Plan to reduce the potential short-term impacts to below a level of significance.

2.2.3 Cumulative Impact Analysis

For the purposes of this EIR, the geographic extent for the cumulative Study Area for agricultural resources includes the regional context and areas within the 5-mile radius as depicted in Figure 1-16, Cumulative Projects, in Chapter 1, Project Description. Development of the Proposed Project would result in the loss of 62.4 acres of land designated as Farmland of Local Importance and 635.6 acres of land designated as Grazing Land. Development of the Proposed Project would result in the loss of Farmland of Local Importance. The Otay Ranch PEIR determined that the incremental and cumulative loss of agricultural lands as a result of

development of Otay Ranch was a significant impact. The Proposed Project would contribute to this significant cumulative impact. When combined with the other surrounding projects (see Figure 1-16 in Chapter 1), specifically Jamul Highlands Estates, Lyons Valley 8, Otay Ranch Village 13, and Otay Ranch Planning Area 17, which also involve conversion of agricultural resources into suburban uses, a significant decrease in agricultural land use within the City of Chula Vista and the County would occur. Without property owner cooperation and substantial financial incentives, it is infeasible to provide permanent on- or off-site mitigation to replace converted farmland. In summary, the Proposed Project, when combined with many of the projects listed in Table 1-7, Cumulative Projects List, in Chapter 1, would contribute to a cumulatively considerable impact (**Impact AG-CUM-1**) to agricultural resources.

2.2.4 Significance of Impacts Prior To Mitigation

Based on the analysis above, the Proposed Project would have the following **potentially significant and cumulatively considerable impacts** prior to mitigation:

Impact AG-1 The Proposed Project would result in loss of an agricultural resource for the potential production of coastal-dependent crops, due to its location in a coast area climate zone and because the Project Area contains soils applicable to Farmland of Local Importance.

Impact AG-CUM-1 The Proposed Project would result in a cumulatively considerable loss of an agricultural resource for the potential production of coastal-dependent crops, due to its location in a coast area climate zone and because the Project Area contains soils applicable to Farmland of Local Importance.

2.2.5 Mitigation

The following mitigation measure would partially reduce indirect and cumulative impacts to agricultural resources, but not to a level less than significant:

M-AG-1: As required by the Otay Ranch General Development Plan/Otay Subregional Plan (Otay Ranch GDP/SRP), an Agricultural Plan shall be prepared by the Proposed Project applicant, or its designee, prior to approval of any Specific Plan affecting on-site agricultural resources and will be required for each subsequent development proposal (i.e., villages, Town Center, the Eastern Town Center, the University, and Rural Estate Planned Community). The Agricultural Plan shall indicate the type of agricultural activity allowed as an interim use. Specifications shall include buffering guidelines designed to prevent potential land use interface impacts related to noise, odors, dust, insects, rodents, and chemicals that may accompany agricultural activities and operations. Adequate buffering shall be provided between the proposed development area and the interim agriculture use. Buffering measures

may include the following: (1) a 200-foot distance between property boundaries and agricultural operations; (2) if permitted interim agricultural uses require the use of pesticide, then commercially reasonable limits shall be placed on the time of day, the type of pesticide application, and the appropriate weather conditions under which such application may occur; (3) use of vegetation along the field edges adjacent to development that can be used for shielding (i.e., corn); and (4) notification of adjacent property owners of potential pesticide applications and use of fencing. The County of San Diego department with jurisdiction over these areas shall review the Agricultural Plan to verify that proposed guidelines are adequate to prevent impacts associated with incompatible land uses from occurring.

The Otay Ranch PEIR previously determined that there are no feasible mitigation measures to reduce the Proposed Project's agricultural impact to below a level of significance. As stated in the Otay Ranch PEIR, the loss of agricultural land capable of supporting coastal-dependent crops is considered to be a significant, unmitigable impact regardless of the feasibility of maintaining the land in agricultural production (e.g., because of the lack of water resources). The loss of agricultural resources identified under the Otay Ranch PEIR was determined to be significant and unavoidable, and overriding considerations were adopted for the Otay Ranch GDP/SRP. The Purchase of Agricultural Conservation Easement (PACE) program was approved after the approval of the Otay Ranch PEIR, and participation in the PACE program would not mitigate the impacts to agricultural resources within Otay Ranch, including the Proposed Project.

Further, placing permanent agricultural easements or restrictions is infeasible due to high land costs, high water and labor costs, restrictive water use regulations, restrictive environmental regulations related to air quality and use of pesticides, agricultural competition from other parts of the state and from foreign countries, and the likelihood of incompatibility with other existing and planned land uses due to growing urbanization within the Otay Ranch area.

2.2.6 Conclusion

Once fully developed, the Proposed Project would eliminate all agricultural activity in the Project Area. The Project Area includes approximately 62.4 acres of land designated as Farmland of Local Importance and 635.6 acres of land designated as Grazing Land. The Proposed Project would result in loss of an agricultural resource for the potential production of coastal-dependent crops, due to its location in a coast area climate zone and because the Project Area contains soils designated to have local importance. Because no mitigation measures are available to reduce the Proposed Project's impacts to agricultural resources to below a level of significance, these impacts would remain **significant and unavoidable**.

**Table 2.2-1
LARA Model Factor Ratings**

Required Factor	High	Moderate	Low
Climate	X		
Water			X
Soil Quality			X

LARA = Local Agricultural Resources Assessment.

**Table 2.2-2
Interpretation of LARA Model Results**

LARA Model Results			LARA Model Interpretation
Possible Scenarios	Required Factors	Complementary Factors	
Scenario 1	All three factors rated high	At least one factor rated high or moderate	The site is an important agricultural resource.
Scenario 2	Two factors rated high and one factor rated moderate	At least two factors rated high or moderate	
Scenario 3	One factor rated high and two factors rated moderate	At least two factors rated high	
Scenario 4	All factors rated moderate	All factors rated high	
Scenario 5	At least one factor rated low importance	N/A	The site is not an important agricultural resource.
Scenario 6	All other model results		

Source: County of San Diego 2007.

LARA = Local Agricultural Resources Assessment; N/A = not applicable.