

## MEMORANDUM

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**To:** Mr. Greg Mattson, Project Manager, San Diego County  
**From:** Joshua Sanders, Dudek  
**Subject:** Visual Resources Technical Memorandum for the Village 14 and Planning Areas 16/19  
Proposed Project Amendment  
**Date:** December 2 2019  
**cc:** GDCI Proctor Valley L.P.

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### Introduction

This Memorandum reflects proposed changes to the Otay Ranch Village 14 and Planning Areas 16/19 Project that was approved by the San Diego County Board of Supervisors on June 26, 2019 (Approved Project). The changes to the Approved Project would reconfigure the development footprint to consolidate development in Village 14; add 147 units, for a total of 1,266 residential units; and reduce impacts by approximately 232 acres, to 577 acres (the Proposed Project Amendment). Figure 1, Regional Location Map, shows the regional location of the Approved Project Area and the Proposed Project Amendment Project Area, in the County of San Diego (County).

An Environmental Impact Report (EIR) was prepared for the Approved Project and was certified by the Board on June 26, 2019. The Final EIR analyzed the potential impacts of the Approved Project. The Final EIR also analyzed potential impacts associated with the EIR Land Exchange Alternative, which was one of the alternatives to the Approved Project. The Final EIR is incorporated herein by reference and the results are summarized in Section 3 and mitigation measures are described in Section 5.

The Final EIR analyzed the Approved Project's potential impacts to aesthetics and visual resources in Section 2.1, Aesthetics. This Aesthetics Technical Memorandum was prepared for the Proposed Project Amendment. The purpose of this analysis is to evaluate whether, and to what extent, the potential impacts of the Proposed Project Amendment to aesthetics and visual resources differ from those of the Approved Project and, if appropriate, the EIR Land Exchange Alternative. This technical memorandum includes the following sections: (1) background, (2) Proposed Project Amendment description, (3) summary of the Approved Project's impacts to aesthetics and visual resources, (4) analysis of the Proposed Project Amendment's impacts to aesthetics and visual resources, (5) mitigation measures, and (6) conclusion.

For additional context, the following terminology is used in this Technical Memorandum.

## Terminology

**Approved Project:** The project described in Otay Ranch Village 14 and Planning Areas 16/19 Tentative Map 5616, Specific Plan 16-002, and the certified EIR, which the County of San Diego (County) approved on June 26, 2019. The Approved Project permits 1,119 residential units within a Project Area of approximately 1,369 acres. The Development Footprint of the Approved Project is 809 acres.

**Conserved Open Space:** Conserved Open Space refers to 24.5 acres of land within the Project Area, which, while designated in the Otay Ranch General Development Plan/Otay Subregional Plan (Otay Ranch GDP/SRP) for residential uses within Village 14 and Planning Areas 16/19, will not be developed as part of the Proposed Project Amendment. Instead, the Conserved Open Space will be preserved on site and be (a) added to the Otay Ranch Resource Management Plan (RMP) Preserve (through a future RMP Amendment), (b) managed under a separate RMP, or (c) utilized to mitigate impacts to the City of San Diego Multiple Species Conservation Program (MSCP) Cornerstone Lands. The Conserved Open Space areas are located adjacent to Otay Ranch RMP Preserve and will be conserved by recording a biological open space easement over the land.

**Development Footprint:** The areas where a given project will cause permanent or temporary ground disturbance. The Development Footprint includes all on-site development, off-site improvements, and impacts resulting from infrastructure and other allowable uses within the Otay Ranch Resource Management Plan (RMP) Preserve.

**EIR Land Exchange Alternative:** The project alternative identified as the “Land Exchange Alternative” in Chapter 4 of the certified Final EIR. This Land Exchange Alternative contemplated a land exchange with the California Department of Fish and Wildlife (CDFW) and would develop 1,530 residential units within a Project Area of approximately 2,387.6 acres, with a Development Footprint of 658.3 acres.

**Off-Site Improvements:** Off-site improvements total approximately 40.1 acres and include Proctor Valley Road, wet and dry utilities, drainage facilities, trails, an off-site sewer pump station in the southern reach of Proctor Valley Road, and off-site sewer facilities to connect to the Salt Creek Interceptor as planned since 1994.

**Project Area:** The total land area for the Proposed Project Amendment as contemplated in the proposed land exchange between applicant and CDFW.<sup>1</sup> The Project Area consists of approximately 1,283.6 acres currently owned by GDCI Proctor Valley L.P., the owner/applicant, 219.4 acres currently owned by CDFW, and approximately 40.1 acres of off-site improvements, for a total of 1,543 acres.

**Proposed Project Amendment:** The Proposed Project Amendment reflects proposed changes to the Approved Project, which would add 147 units for a total of 1,266 residential units and would reduce the Development Footprint by approximately 232 acres, to a total of 577 acres, within a Project Area of 1,543 acres, as shown on Figure 2, Site Utilization Plan, and more fully described below in Section 2. The Proposed Project Amendment includes a Revised Tentative Map and Specific Plan Amendment. As contemplated in the Dispute Resolution Agreement, the Proposed Project Amendment assumes and will require a County-initiated amendment to the MSCP County Subarea Plan. Because the amendment to the MSCP County Subarea Plan will be initiated by the County, it is not part of the Proposed Project Amendment.

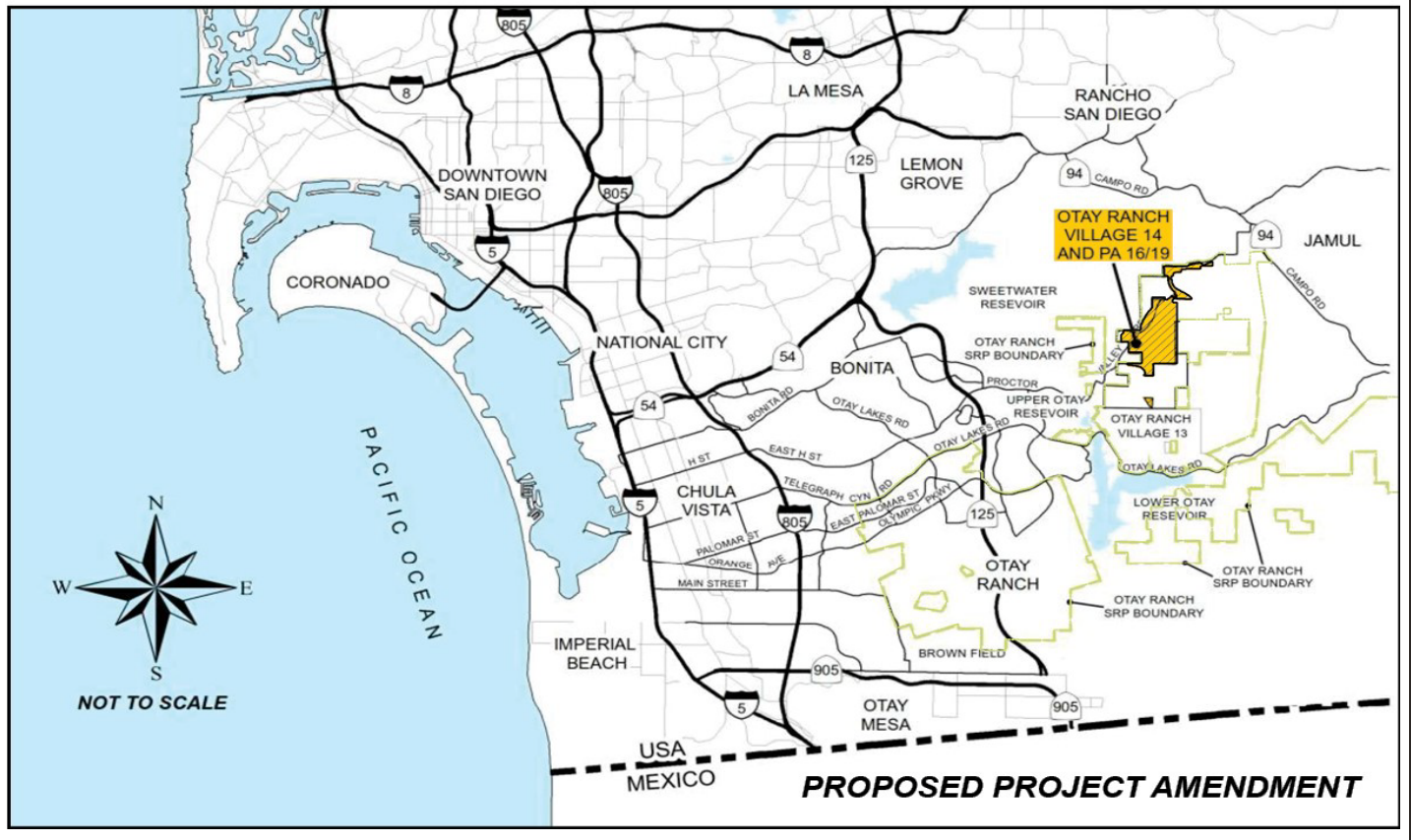
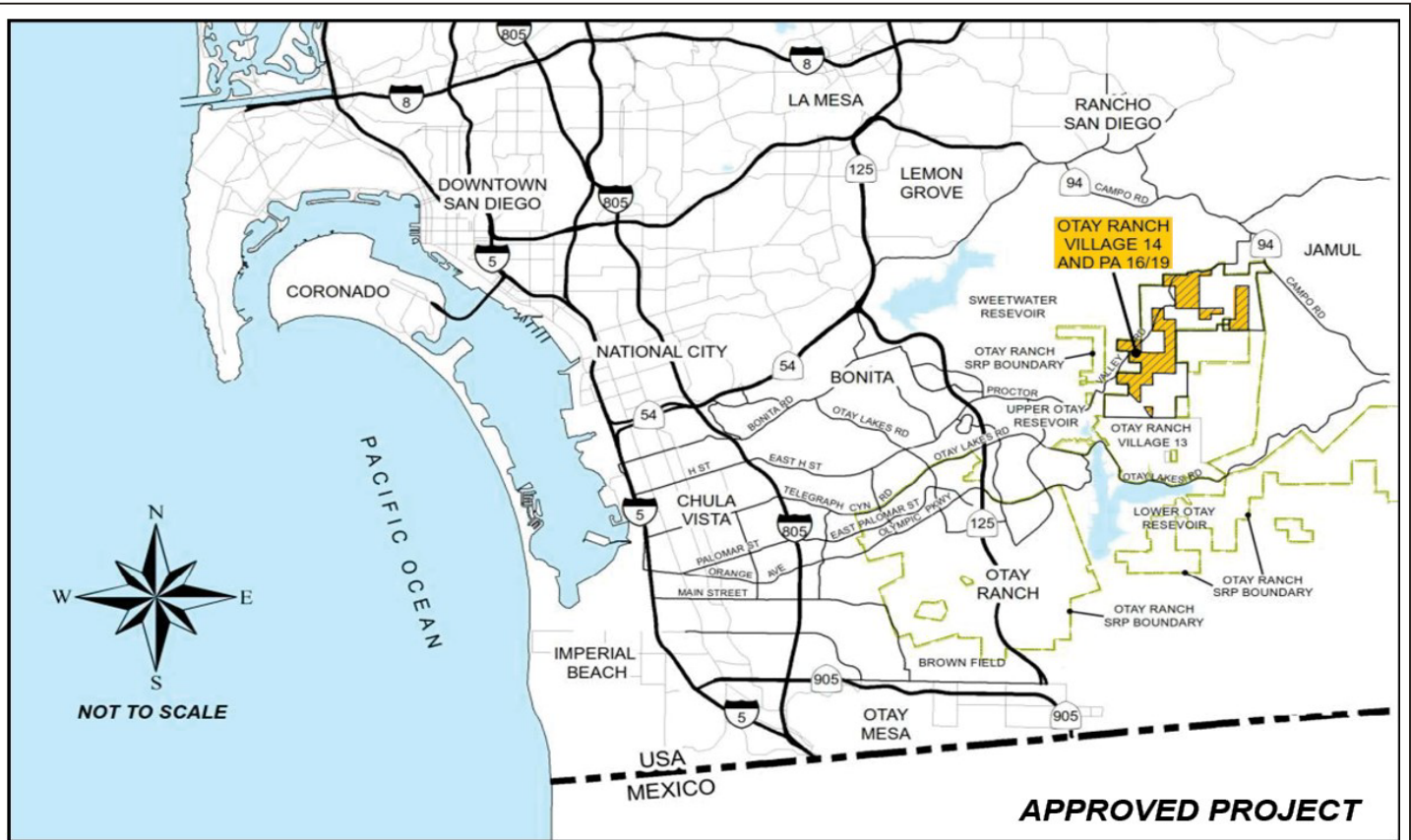
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<sup>1</sup> As indicated above, the land exchange necessary to implement the Proposed Project Amendment must be approved by the California Wildlife Conservation Board.

**PV1 and PV3:** PV1 and PV3 are areas of the Approved Project located in Village 14 as shown on Figure 3 attached.

**Revised Tentative Map:** The Revised Tentative Map reflects revisions to the June 26, 2019, Approved Tentative Map #5616 that are necessary to process and implement the land exchange with CDFW and the Proposed Project Amendment in the County.

**Specific Plan Amendment:** The Specific Plan Amendment reflects revisions to the June 26, 2019, Approved Specific Plan #16-002 that are necessary to process and implement the land exchange with CDFW and the Proposed Project Amendment in the County.



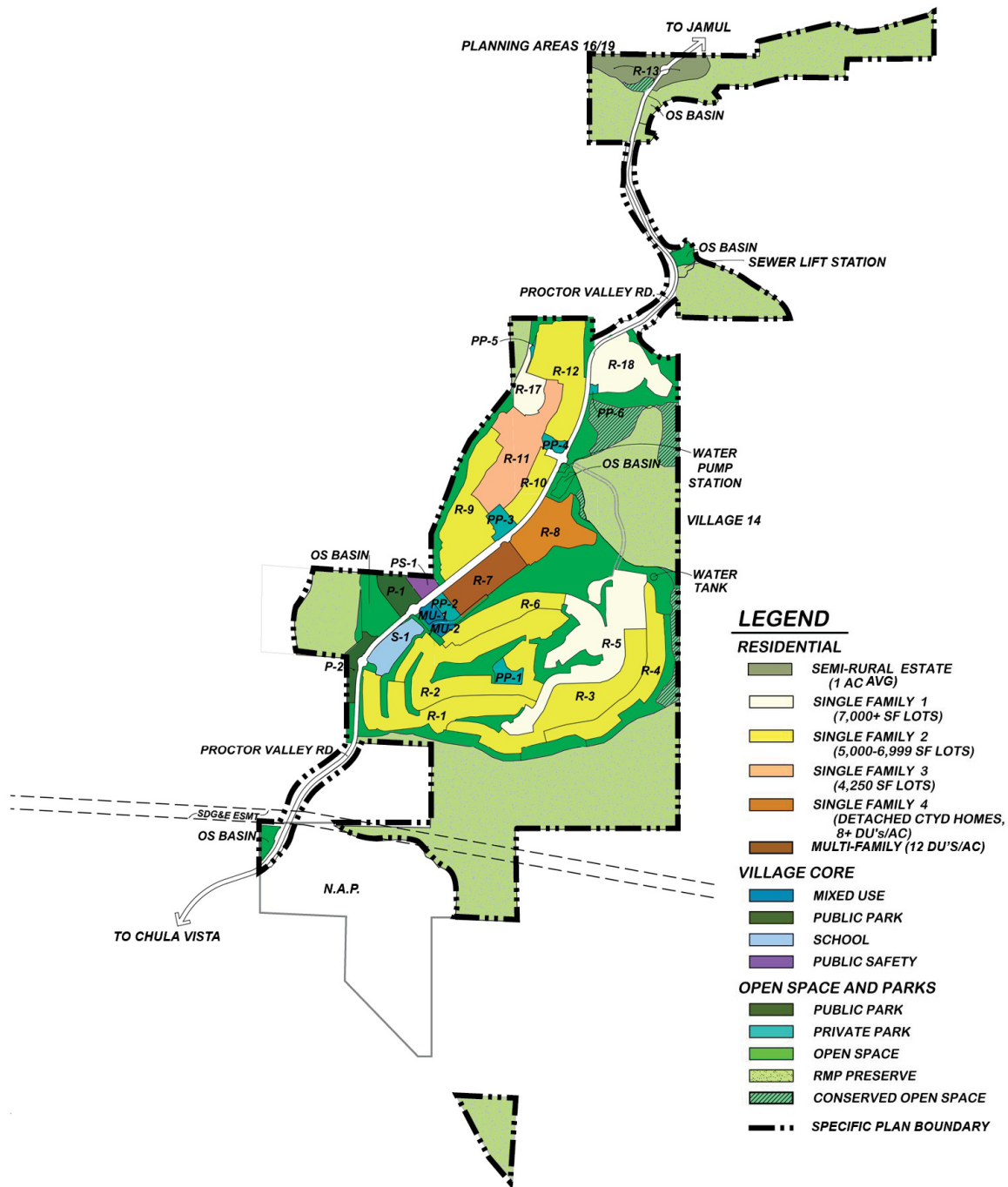
SOURCE: Hunsaker 2019

**FIGURE 1**

Regional Location

Otay Ranch Village 14 and Planning Areas 16/19 Proposed Project Amendment





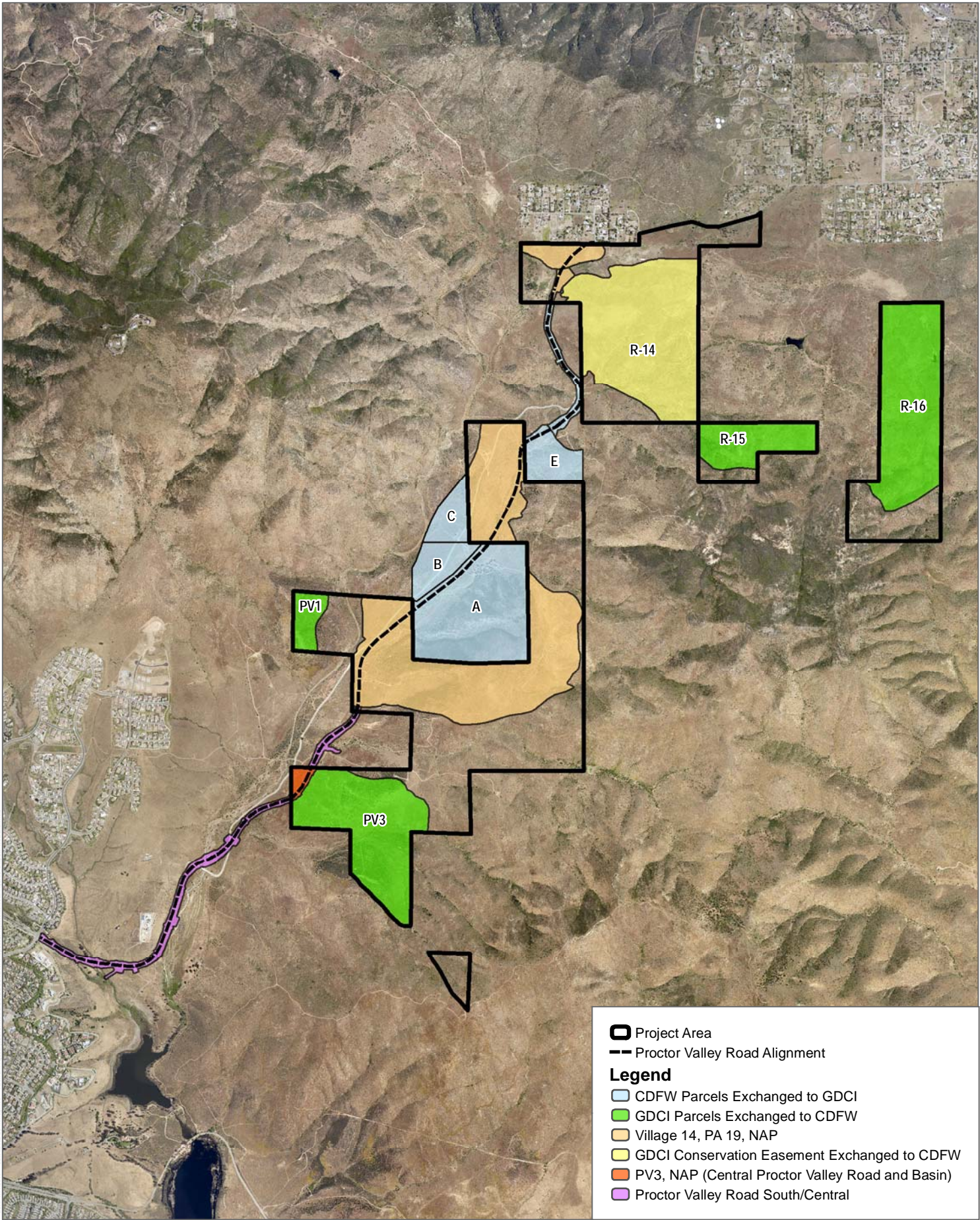
SOURCE: Hunsaker 2019

**FIGURE 2**

Site Utilization Plan

Otay Ranch Village 14 and Planning Areas 16/19 Proposed Project Amendment





SOURCE: SANGIS 2017; Hunsaker 2019

FIGURE 3

Proposed Land Exchange

Otay Ranch Village 14 and Planning Areas 16/19 Proposed Project Amendment



## Section 1. Background

The Proposed Project Amendment Project Area comprises approximately 1,543 acres of undeveloped land within the Proctor Valley area of the 23,000-acre Otay Ranch master planned community (see Figure 4, Proposed Project Amendment Project Area). The Proposed Project Amendment reflects proposed changes to the Approved Project, including a proposed land exchange with the California Department of Fish and Wildlife (CDFW).

On June 27, 2019, the owner/applicant of the Approved Project entered into a Dispute Resolution Agreement with CDFW, the U.S. Fish and Wildlife Service, and the County. Pursuant to this agreement, the owner/applicant would seek a land exchange with CDFW through a process overseen by the California Wildlife Conservation Board. The proposed land exchange, if approved by the Wildlife Conservation Board, would require the owner/applicant to (i) transfer 147.3 acres in Village 14 and 192.4 acres in Planning Area 16 to CDFW, and (ii) record a conservation easement over 191.5 acres in Planning Area 16. In exchange, CDFW would transfer 219.4 acres in Village 14 to the owner/applicant. The Proposed Project Amendment would then be implemented upon the lands within the applicant's ownership, including those received via the Wildlife Conservation Board land exchange. Because the Proposed Project Amendment assumes the above-described land exchange, it would result in a different development footprint than the Approved Project's development footprint. Therefore, a Specific Plan Amendment to the approved Village 14 and Planning Areas 16/19 Specific Plan and a Revised Tentative Map are required processes for the Proposed Project Amendment.

While the Proposed Project Amendment and EIR Land Exchange Alternative both contemplate exchanges of land with the CDFW, the Development Footprints and other aspects differ. It is important to note that the Development Footprint of the Proposed Project Amendment was assessed in the certified Final EIR as part of the Approved Project Development Footprint and as part of the EIR Land Exchange Alternative Development Footprint.

## Section 2. Proposed Project Amendment Description and Summary of Amendment/Revisions

The Proposed Project Amendment proposes 1,266 residential units within a Project Area of 1,543 acres. The Proposed Project Amendment Development Footprint would be approximately 578.6 acres, which would consist of approximately 513.1 acres within Otay Ranch Village 14, 25.2 acres within Otay Ranch Planning Area 19, and 40.1 acres of off-site improvements (i.e., Proctor Valley Road). Of the 1,266 residential units, 1,253 units would be located in Village 14 (consistent with the Otay Ranch GDP/SRP) and 13 units would be located in Planning Area 19 (consistent with the Otay Ranch GDP/SRP). The Proposed Project Amendment is depicted in Figure 2 and summarized in Tables 1 through 3.

As described above, the Proposed Project Amendment would also include a land exchange between the owner/applicant and CDFW, which would require the owner/applicant to transfer 339.7 acres to CDFW and record a conservation easement over 191.5 acres, and, in exchange, CDFW would transfer 219.4 acres in Village 14 to the owner/applicant to create a consolidated Development Footprint. The proposed land exchange between the applicant and CDFW is depicted in Figure 3. As defined above, the Proposed Project Amendment requires a Specific Plan Amendment and Revised Tentative Map, which must be approved by the County. The Revised Tentative Map would replace that certain approved Tentative Map TM #5616, approved by the County on June 26, 2019. The Specific Plan Amendment would amend the Specific Plan 16-002 to reflect the Proposed Project Amendment, including the Revised Tentative Map and the land exchange with CDFW.

**Table 1. Village 14 and Planning Areas 16/19 Proposed Project Amendment Site Utilization Plan Summary**

Description	Village 14		Planning Area 16/19		Total Proposed Project Amendment	
	Gross Acres	Units	Gross Acres	Units	Gross Acres	Units
<b>Residential Subtotal <sup>(4)</sup></b>	<b>386.6</b>	<b>1,253</b>	<b>14.9</b>	<b>13</b>	<b>401.4</b>	<b>1,266</b>
<b>Non-Residential Uses</b>						
Mixed Use <sup>(2)</sup>	2.7				2.7	
Public Parks	10.2				10.2	
Private Parks/Recreation <sup>(3)</sup>	9.5				9.5	
Public Safety Site	2.3				2.3	
Elementary School Site	9.9				9.9	
Open Space	47.8		1.7		49.5	
Conserved Open Space	23.0		1.5		24.5	
Otay Ranch RMP Preserve	278.6		98.4		377.0	
Circulation	23.3		3.4		26.7	
<i>Non-Residential Uses Subtotal</i>	<i>407.2</i>		<i>105.0</i>		<i>512.1</i>	<i>-</i>
<b>Total Proposed Project Amendment <sup>4</sup></b>	<b>793.7</b>	<b>1,253</b>	<b>119.8</b>	<b>13</b>	<b>913.6</b>	<b>1,266</b>
<b>Other Off-sites</b>						
Off-site Improvements	40.1				40.1	
Off-site Preserve PA 16			58.2		58.2	
Parcels Exchanged to CDFW	147.3		192.4		339.7	
Conservation Easement PA 16			191.5		191.5	
<b>Total Proposed Project Amendment Area</b>					<b>1,543.1</b>	<b>1,266</b>

Notes: PA = Planning Area, CDFW = California Department of Fish and Wildlife.

<sup>1</sup> Residential gross acres includes 96.7 acres of related internal slopes, fuel modification and/or preserve edge open space lots.

<sup>2</sup> Village 14 Mixed Use acreage includes 10,000 sf of commercial use.

<sup>3</sup> Village 14 has 2.1 acres of private pocket parks included in the residential acreage; therefore, the subtotal including PPP is 11.7 acres.

<sup>4</sup> Totals may not sum due to rounding



**Table 2. Proposed Project Amendment Site Utilization Plan Detail (Village 14)**

Description		Gross Acres <sup>(1,2)</sup>	Units <sup>(3)</sup>	Density
<b>Single Family Residential</b>				
R-1	50*100	33.1	103	3.1
R-2	60*100	48.3	136	2.8
R-3	60*85	35.8	112	3.1
R-4	60*100	31.5	73	2.3
R-5	75*100	51.7	121	2.3
R-6	60*85	22.5	47	2.1
R-8	Courtyard	21.1	116	5.5
R-9	60*85	33.0	96	2.9
R-10	60*85	8.5	31	3.7
R-11	50*85	25.4	119	4.7
R-12	50*100	27.6	94	3.4
R-17	70*100	7.4	10	1.4
R-18	70*100	27.8	45	1.6
<i>Single Family Residential Subtotal</i>		373.8	1,103	3.0
<b>Multi-Family</b>				
R-7	MF	12.7	150	11.8
<i>MF Subtotal</i>		12.7	150	11.8
<b>Residential Subtotal <sup>(3)(4)</sup></b>		<b>386.6</b>	<b>1,253</b>	<b>3.2</b>
<b>Non-Residential Uses</b>				
Mixed Use <sup>(2)</sup>	MU - C	2.7		
<b>Public Parks</b>				
P-1	Village Green Park	6.2		
P-2	Scenic Park	3.9		
<i>Public Parks Subtotal</i>		10.2		
<b>Private Parks &amp; Recreation</b>				
PP-1	Central	2.8		
PP-2	Village Core	2.1		
PP-3	West	1.9		
PP-4	West	1.5		
PP-5	Northwest	0.8		
PP-6	Northeast	0.4		
PPP <sup>(3)</sup>	Various	0.0		
<i>Private Parks/Recreation Subtotal</i>		9.5		
Public Safety Site		2.3		
Elementary School Site		9.9		
Open Space		47.8		
Conserved Open Space		23.0		
Otay Ranch RMP Preserve		274.9		
Circulation - In Preserve		3.7		
Circulation - Arterial		23.3		

**Table 2. Proposed Project Amendment Site Utilization Plan Detail (Village 14)**

Description	Gross Acres <sup>(1,2)</sup>	Units <sup>(3)</sup>	Density
<i>Non-Residential Uses Subtotal</i>	407.2		
<b>Village 14 Subtotal</b>	<b>793.7</b>	<b>1,253</b>	<b>1.6</b>

**Notes:**

- <sup>1</sup> Residential gross acres includes 96.5 acres of related internal slopes, fuel modification and/or preserve edge open space lots.
- <sup>2</sup> Village 14 Mixed Use acreage includes 10,000 sf of commercial use.
- <sup>3</sup> Village 14 has 2.1 acres of private pocket parks included in the residential acreage; therefore, the subtotal including PPP is 11.6 acres.
- <sup>4</sup> Totals may not sum due to rounding

**Table 3. Proposed Project Amendment Site Utilization Plan Detail  
(Planning Areas 16/19)**

Description	Gross Acres	Units	Density
<b>Residential Uses</b>			
R-13 ( PA 19 Estates)	14.9	13	0.9
<i>Residential Subtotal <sup>(1)</sup></i>	14.9	13	0.9
<b>Non-Residential Uses</b>			
Circulation in Preserve	1.4		
Open Space	1.7		
Conserved Open Space	1.5		
Otay Ranch RMP Preserve	97.0		
Circulation Arterial	3.4		
<i>Non-Residential Uses Subtotal</i>	105.0		
<i>Planning Area 19 Subtotal</i>	119.8	13	0.1
<b>Proposed Project Amendment Total <sup>(2)</sup></b>	<b>913.6</b>	<b>1,266</b>	<b>1.4</b>

**OTHER**

Description	Gross Acres <sup>(1)</sup>	Target Units	Density
<b>Other Applicant Owned NAP of TM</b>			
PV1 exchanged to CDFW	18.9		
PV3 exchanged to CDFW	128.4		
R-15 Exchanged to CDFW	49.9		
R-16 Exchanged to CDFW	142.5		
R-14 Conservation Easement Area	191.5		
R-15 Preserve	10.5		
R-16 Preserve	47.8		
<i>Subtotal</i>	589.5		
<b>Off-site Acres</b>	<b>40.1</b>		
<b>Proposed Project Amendment Project Area</b>	<b>1,543.1</b>	<b>1,266</b>	

**Notes:** PA = Planning Area.

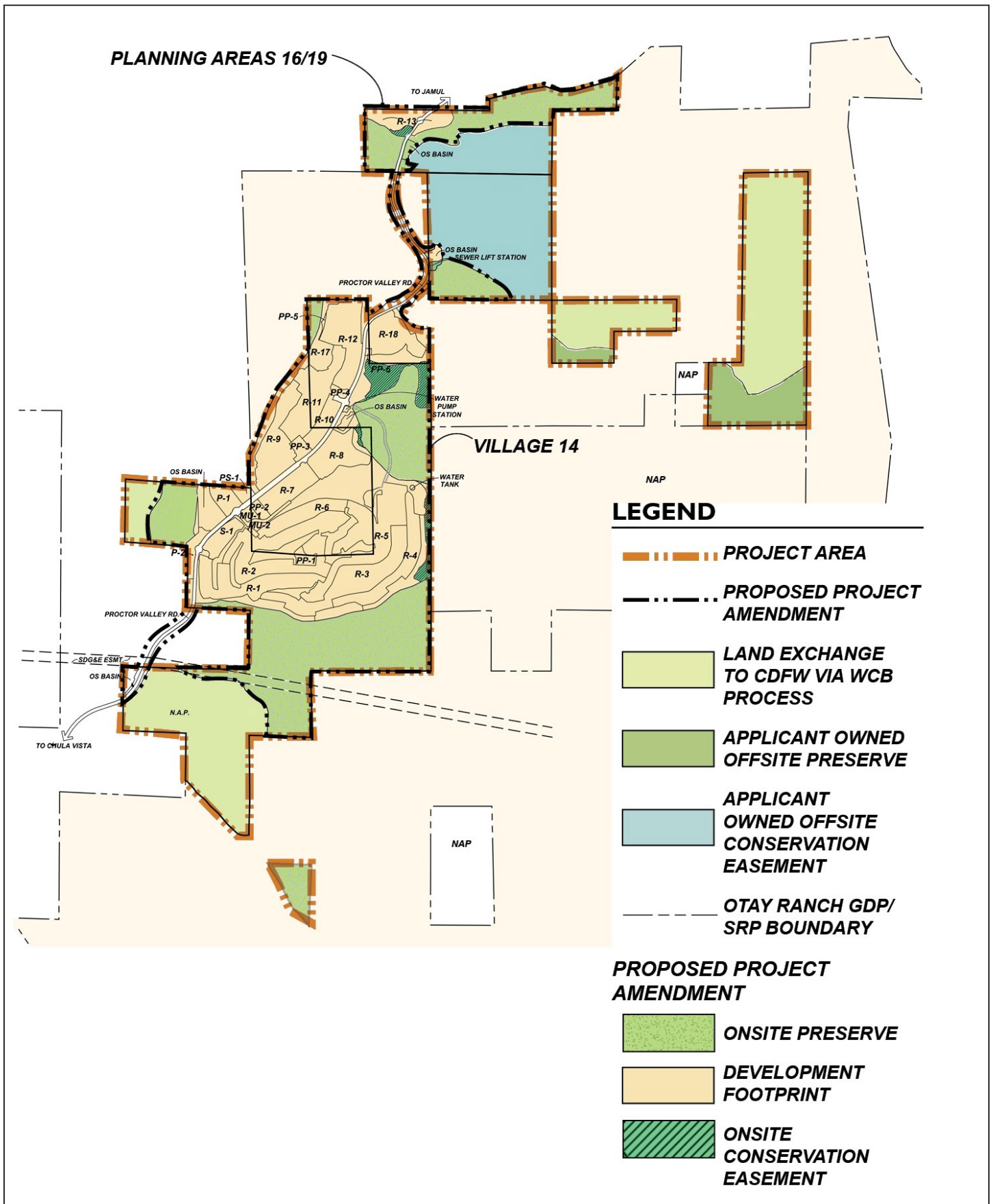
- <sup>1</sup> Residential gross acres includes 2.1 acres of related internal slopes, fuel modification and/or preserve edge open space lots.
- <sup>2</sup> Totals may not sum due to rounding

#### Proposed Project Amendment Relative to the Approved Project and the EIR Land Exchange Alternative.

The Final EIR evaluated both the Approved Project and the EIR Land Exchange Alternative at a project level of analysis. This Technical Memorandum examines whether the Final EIR, through its analysis of the Approved Project and the EIR Land Exchange Alternative, covered all anticipated impacts of the Proposed Project Amendment. Figure 5 depicts the limits of the development contemplated under the Approved Project, the EIR Land Exchange Alternative, and the Proposed Project Amendment. Table 4 provides a summary of the components for the Proposed Project Amendment, the Approved Project, and the EIR Land Exchange Alternative. Note that from a geographical perspective, each acre that comprises the Proposed Project Amendment's Development Footprint is located either within the Approved Project Development Footprint or within the EIR Land Exchange Alternative Development Footprint. In other words, no portion of the Proposed Project Amendment Development Footprint is outside the combined Approved Project and EIR Land Exchange Alternative Development Footprints.

**Table 4. Proposed Project Amendment Comparison to Approved Project and EIR Land Exchange Alternative**

Description	Proposed Project Amendment	Approved Project	EIR Land Exchange Alternative
Development Footprint (Acres)	579	809	658
Project Area (Acres)	1,543	1,369	2,388
Off-sites (Acres)	40	85	40
Units	1,266	1,119	1,530
Proctor Valley Rd.	Same	Same	Same



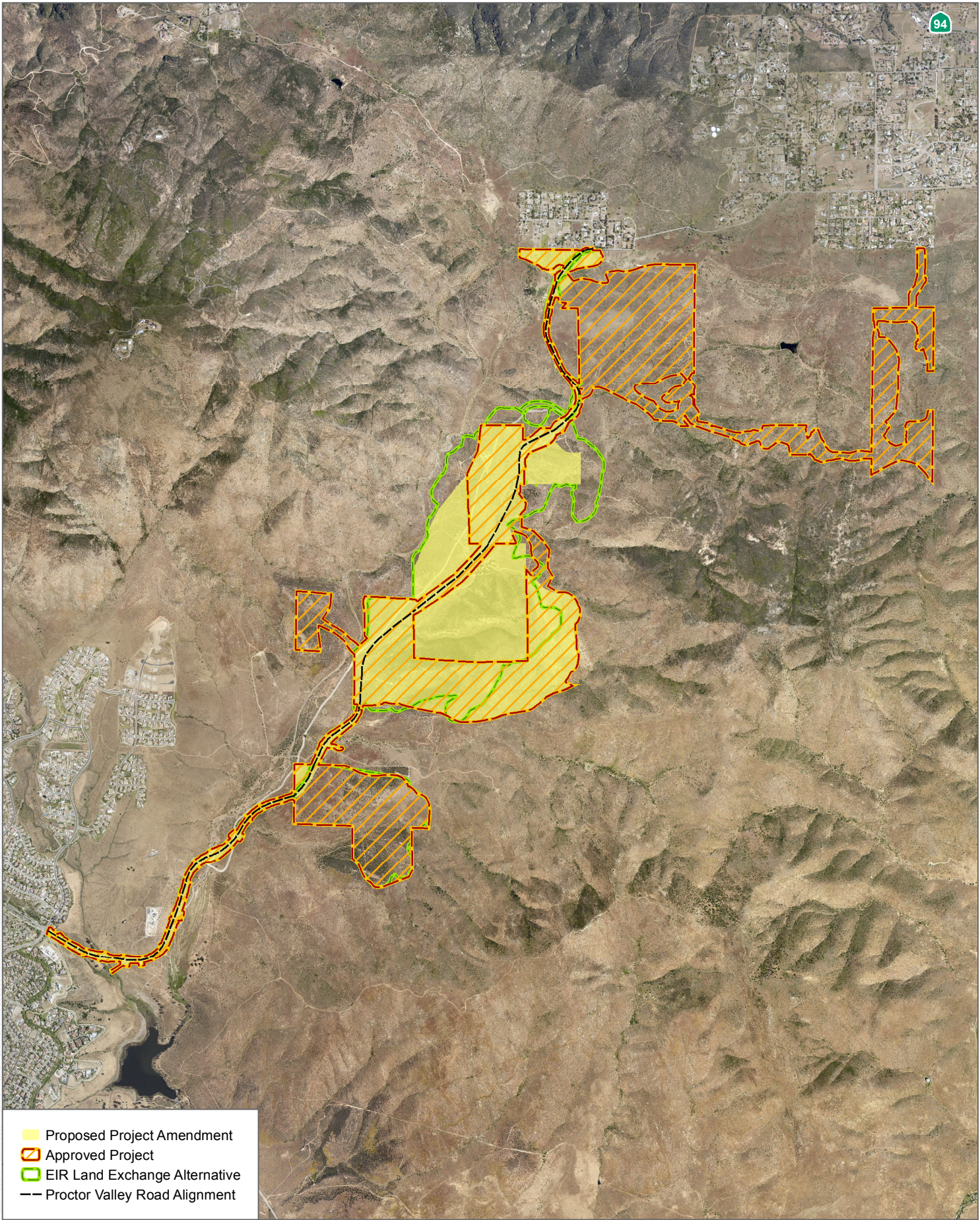
SOURCE: Hunsaker 2019

**FIGURE 4**

Project Area

Otay Ranch Village 14 and Planning Areas 16/19 Proposed Project Amendment





SOURCE: SANGIS 2017; Hunsaker 2019

FIGURE 5

Certified EIR Study Area

Otay Ranch Village 14 and Planning Areas 16/19 Proposed Project Amendment



## Section 3. Approved Project and EIR Land Exchange Alternative Impacts to Aesthetics and Visual Resources

The Final EIR's aesthetics analysis assessed the Approved Project's potential impacts to scenic vistas, existing visual character and quality, light and glare and nighttime views, and conflicts with applicable community and regional plan policies.

As part of the aesthetics assessment, the Final EIR included viewshed analyses of the Village 14 area and Planning Areas 16/19 areas. The viewshed represents the degree to which project features are visible from lands in the surrounding area (i.e., areas that can see the Development Footprint). The viewshed analyses for the Approved Project are included as Figures 2.1-15 and 2.1-16 in the Final EIR and as Figures 6 and 7 in this Technical Memorandum.

### Section 3.1 Impacts to Scenic Vistas

The Final EIR determined that impacts to scenic vistas, including those from public roads, scenic vistas or highways, trail(s) within an adopted County or state trail system or recreational area would be less than significant. Specifically, the Final EIR analyzed impacts associated with views from Proctor Valley Road and concluded that while development would occur adjacent to Proctor Valley Road, roadway improvements would not entail construction of walls or other structures capable of obstructing, interrupting, or detracting from available views to San Miguel Mountain or the Otay Mountains along the southern segment. Further, the analysis found that due to the relatively short duration of view obstruction and interruption, and the prevalence of these views in the visual environment, impacts to existing views along the central segment of Proctor Valley Road associated with the planting of street trees would not be substantial. Finally, the analysis concluded that the anticipated one- to two-story profile of 13 semi-rural estate residences in Planning Area 19 would not substantially obstruct, interrupt, or detract from existing views from the northern segment of Proctor Valley Road.

With respect to the Centennial Trail, the Final EIR determined that the majority of development with the Approved Project would be effectively screened from view, and residential development within the westernmost portions of Village 14 would be located more than 1 mile away from the Centennial Trail (City of Chula Vista) and would not be visually prominent. Therefore, the Approved Project would not substantially interrupt, obstruct, or interrupt available views of San Miguel Mountain, the Jamul Mountains, or Upper or Lower Otay Reservoir from the Centennial Trail.

### Section 3.2 Visual Character or Quality

Due to anticipated landscape contrasts and visual change associated with development of proposed uses within the primarily undeveloped Proctor Valley landscape, the Final EIR determined that the Approved Project's impacts to existing visual character and quality would be significant and unavoidable even with implementation of identified mitigation measures.

Construction of the Approved Project would result in a Development Footprint of approximately 809 acres and approximately 8.9 million cubic yards of cut and 8.9 million cubic yards of fill. The Final EIR determined that this ground disturbance and landform alteration during construction would create new forms, lines, and textures in the Proctor Valley landscape that would be visible from on- and off-site areas. Grading operations would create large, rectangular flat forms and straight lines (i.e., lines associated with limits of grading) on the hill and valley terrain. Grading activities would also expose underlying soils and preparation of building pads would introduce elevated, trapezoidal forms to

the landscape. The visual effects of grading and site preparation would create a noticeable contrast when viewed alongside unaltered areas within the valley and on unaltered hillsides. Thus, the Approved Project's construction activity would permanently change the primarily natural and undeveloped Proctor Valley landscape to residential neighborhoods. The Final EIR determined that these impacts to the existing character and quality of the visual conditions would be significant and unavoidable (**Impact AE-1**).

Further, the Final EIR found that the Approved Project would entail development within an undeveloped and primarily natural hill and valley landscape, and that such development would fundamentally alter that landscape to accommodate residences, landscaping, roads, sound walls, parks, utilities, and public safety facilities (e.g., fire/sheriff substation). As a result, the Approved Project would introduce features that would create contrast with existing features in the landscape, and impacts concerning degradation of the existing visual character and quality of the Project Area and surrounding areas would be significant and unavoidable (**Impact AE-2**).

### Section 3.3 Light and Glare

The Final EIR determined that impacts to light and glare would be less than significant because the Approved Project would conform with the Light Pollution Code and the County's Dark Sky Ordinance.

### Section 3.4 Compliance with Applicable Plans

The Final EIR determined that the Approved Project would comply with the applicable goals and policies of the Otay Ranch GDP/SRP (Otay Subregional Plan Volume II) and the mitigation measures identified in the Otay Ranch Program EIR Landform Alteration/Aesthetics section. Therefore, the Final EIR concluded that impacts to compliance with applicable plans would be less than significant.

### Section 3.5 Cumulative Impacts

The Final EIR also analyzed the Approved Project's potential to contribute to a cumulatively considerable impact to aesthetics and visual resources. As analyzed therein, the Final EIR determined that past, current, and future development within the surrounding landscape has resulted and will result in the substantial alteration of the visual character and quality of these areas. Specifically, cumulative projects in the surrounding area, including Otay Ranch Villages 13, 15, and 17; Jamul Highlands Estates; Lyons Valley 8; Poplar Meadow Tentative Map; and Simpson Farms would all result in alteration of the visual character and quality of the area. As such, and consistent with the findings of the Otay Ranch Program EIR, the Approved Project would contribute to a significant and unavoidable cumulative impact on visual character and quality (**Impact AE-CUM-1**).

### Section 3.6 Environmental Impact Report Land Exchange Alternative

The Final EIR determined that the EIR Land Exchange Alternative's impacts on visual character and quality would remain significant and unavoidable at both the project-specific and cumulative levels due to the conversion of open space to a residential community based on visual simulations which were prepared to illustrate impacts of the EIR Land Exchange Alternative (see Appendix 4.1-2 of the Final EIR). As shown in the Final EIR Visual Simulations, the EIR Land Exchange Alternative would introduce features that would contrast with the visual character and quality of the undeveloped Proctor Valley landscape; however, these impacts would be within a reduced Development Footprint compared to the Approved Project. Nonetheless, the EIR Land Exchange Alternative's impacts to the existing visual character and visual quality would be significant and unavoidable. Therefore, because the EIR Land Exchange Alternative would reduce the amount of development in Planning Areas 16/19 and concentrate development in Village 14, the Final EIR determined its impacts on visual character and quality, while still significant and unavoidable, would be less severe than those of the Approved Project.

As with the Approved Project, impacts from implementation of the EIR Land Exchange Alternative associated with scenic vistas, light and glare, and compliance with applicable community and regional plans were determined to be less than significant.

## Section 4. Proposed Project Amendment Impacts to Aesthetics and Visual Resources

### Section 4.1 Comparison to Approved Project

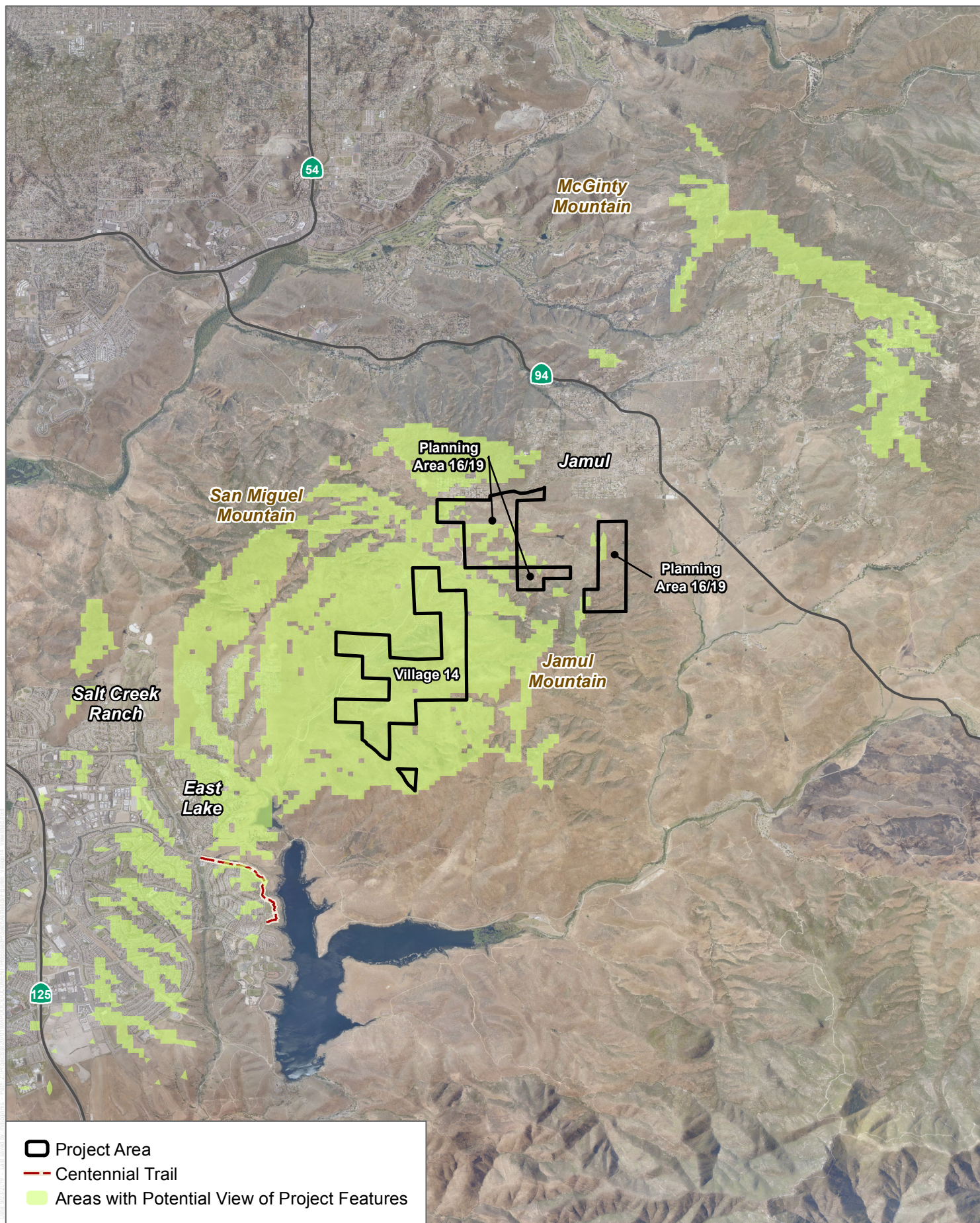
Similar to the Approved Project, the Proposed Project Amendment proposes residential and non-residential uses. The Proposed Project Amendment, however, would concentrate development in Village 14 and result in a Development Footprint that is approximately 230 acres smaller than that of the Approved Project (579 acres compared to 809 acres).

Viewshed analyses for the Approved Project are included as Figures 6 and 7 in this technical memorandum. A viewshed analysis was also prepared for the Proposed Project Amendment and is included as Figure 8. The viewshed illustrates the potential visibility of the Proposed Project Amendment project features from lands in the surrounding area (i.e., areas that can see the Development Footprint). Specifically, the Proposed Project Amendment would concentrate development in Proctor Valley along Proctor Valley Road and would not include development in Planning Area 16. Unlike the Approved Project, the Proposed Project Amendment does not contemplate development in south Proctor Valley (i.e., in the area referred to as PV3). The Proposed Project Amendment's overall Project Area is approximately 1,543 acres, which is larger than that of the Approved Project (approximately 1,368 acres). However, more than 950 of the 1,543 acres (approximately 62 percent) would not be developed and instead would be designated preserve or made subject to conservation easements. Therefore, as shown in Table 4, the total Development Footprint of the Proposed Project Amendment (579 acres) is substantially smaller than the total Development Footprint of the Approved Project (809 acres). This accounts for a 230-acre reduction in the Development Footprint compared to the Approved Project, or approximately 28.7% less developed area. Because it has a smaller Development Footprint than the Approved Project, and because it would conserve rather than develop Planning Area 16, the Proposed Project Amendment development would be less visible to surrounding areas than the Approved Project would be.

In addition, the Proposed Project Amendment avoids development in visually sensitive areas that would be impacted by the Approved Project. Specifically, the Proposed Project Amendment would avoid development in higher elevation (i.e., more visible) areas, including Planning Area 16. It would also avoid development in the South Village portion of Village 14, closest to existing development in Chula Vista. Such avoidance, when coupled with an expanded Otay Ranch RMP/MSCP Preserve, would result in reduced aesthetic impacts under the Proposed Project Amendment relative to the Approved Project. By consolidating the proposed development within Proctor Valley and along Proctor Valley Road, and by limiting the amount of estate residential development near existing rural residential uses off Echo Valley Road, the Proposed Project Amendment would generally confine the Proposed Project Amendment viewshed—and impacts on that viewshed—to the immediate Proctor Valley area. Thus, when compared to the Approved Project, the Proposed Project Amendment would be less visible from receptors in Chula Vista and Jamul.

The viewshed impact analysis in Figure 8 shows that the Proposed Project Amendment primarily would affect views from vantages in Proctor Valley. Compared to the Approved Project, the Proposed Project Amendment would have reduced impacts on views from the East Lake and Salt Creek Ranch areas of Chula Vista (see Figures 6 and 7, Viewshed Analyses for the Approved Project). The Proposed Project Amendment's impacts on views from the Jamul area would be comparable to those of the Approved Project, but because the Proposed Project Amendment does not contemplate development in the north and northeast Proctor Valley area (i.e., Planning Area 16), it will have fewer and less intense impacts on views from Jamul, along State Route 94, and to the east of State Route 94. For this same reason, the Proposed Project Amendment also would avoid impacts to the broad landscape to the east of Proctor Valley and east of State Route 94, both of which would be visually affected by the Approved Project (see Figure 7).



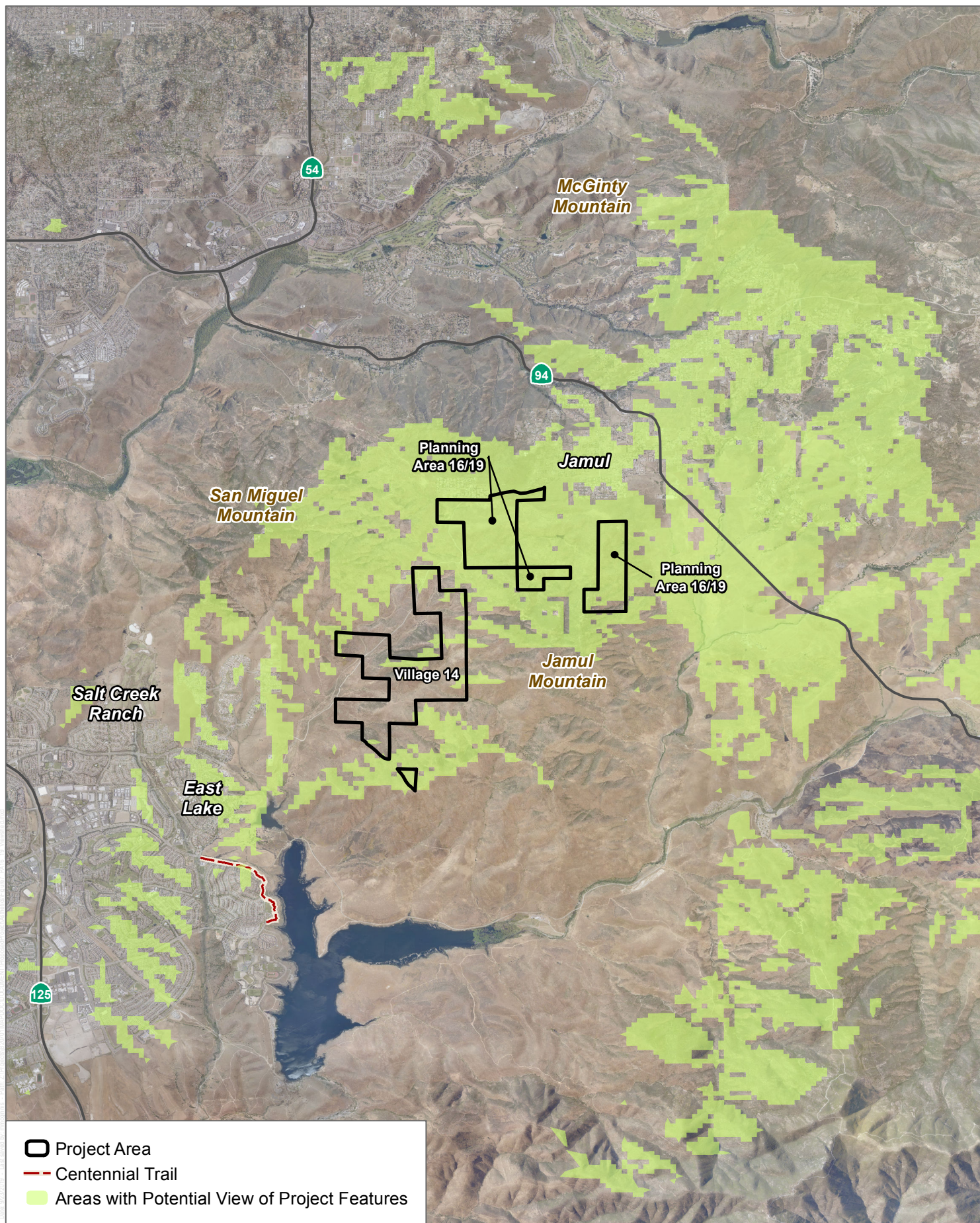


**FIGURE 6**

**Viewshed Analysis - Approved Adara Project Village 14**

Otay Ranch Village 14 and Planning Areas 16/19 Proposed Project Amendment





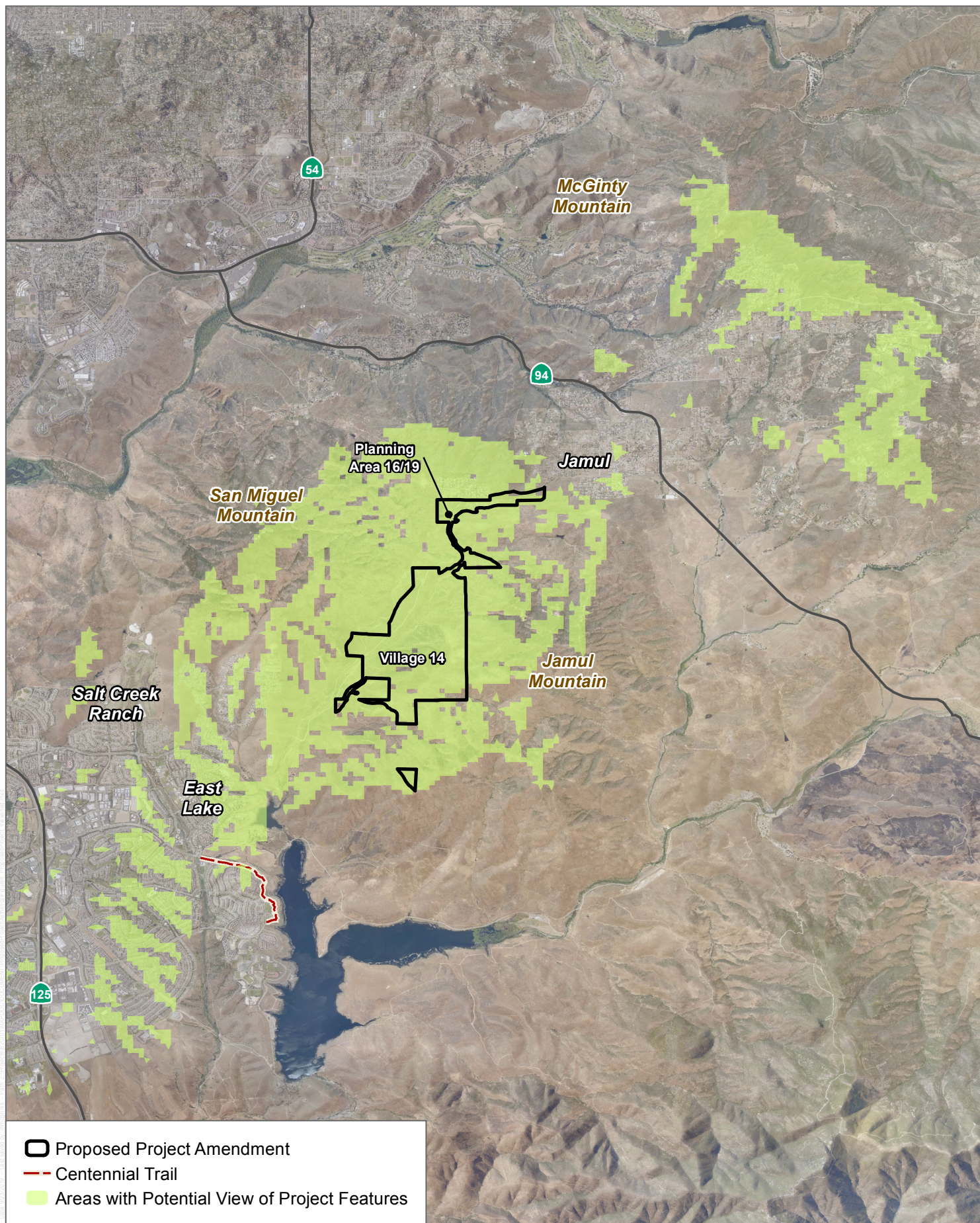
SOURCE: SANGIS 2017; Hunsaker 2019

**FIGURE 7**

**Viewshed Analysis - Approved Adara Project Planning Areas 16/19**

Otay Ranch Village 14 and Planning Areas 16/19 Proposed Project Amendment





SOURCE: SANGIS 2017; Hunsaker 2019



## Section 4.2 Scenic Vistas

Similar to the Approved Project, the Proposed Project Amendment would result in less-than-significant impacts to scenic vistas. With respect to public roads and scenic views and highways, the Proposed Project Amendment would reduce impacts to views along Proctor Valley Road by conserving the area referred to as “PV3” as open space, thereby reducing view impacts along the southern portion of Proctor Valley Road. Similar to the Approved Project, impacts to existing views along the central segment of Proctor Valley Road would not be substantial due to the relatively short duration of view obstruction and interruption associated with introduction of development within the foreground of the road, and the prevalence of these views in the visual environment. Finally, the northern segment of Proctor Valley Road would have similar one- to two-story profiles of 13 semi-rural estate residences in Planning Area 19, which would not substantially obstruct, interrupt, or detract from existing views.

With respect to the Centennial Trail, the majority of development within the Proposed Project Amendment would be effectively screened from view, and residential development within the westernmost portions of Village 14 would be located more than 1 mile away from the Centennial Trail (City of Chula Vista) and would not be visually prominent; therefore, impacts to the Centennial Trail would be reduced compared to the Approved Project.

## Section 4.3 Visual Quality and Character

Construction of the Proposed Project Amendment would result in a Development Footprint of approximately 579 acres, or 230 acres less than the Approved Project, and approximately 8.9 million cubic yards of cut and 8.9 million cubic yards of fill. Similar to the Approved Project, this ground disturbance and landform alteration during construction would create new forms, lines, and textures in the Proctor Valley landscape that would be visible from on- and off-site areas. The visual effects of grading and site preparation would create a noticeable contrast when viewed alongside unaltered areas within the valley and on unaltered hillsides. Thus, the Proposed Project Amendment’s construction activity would permanently change the primarily natural and undeveloped Proctor Valley landscape to residential neighborhoods. This impact is considered significant and unavoidable. However, because of the reduced Development Footprint, these impacts would be less than those of the Approved Project.

Similar to the Approved Project, the Proposed Project Amendment would entail development within an undeveloped and primarily natural hill and valley landscape that would be fundamentally altered to accommodate the Approved Project features, including residences, landscaping, roads, sound walls, parks, utilities, and public safety facilities (e.g., fire/sheriff substation). As a result, the Proposed Project Amendment would introduce features that would create contrast with existing features in the landscape. These visual quality and character impacts are considered significant and unavoidable but would be less severe than the visual quality and character impacts of the Approved Project.

## Section 4.4 Light and Glare

Similar to the Approved Project, the Proposed Project Amendment would conform to the Light Pollution Code and the County’s Dark Sky Ordinance. Therefore, impacts to light and glare would be less than significant. Significance conclusion here.

## Section 4.5 Compliance with Applicable Plans

Similar to the Approved Project, the Proposed Project Amendment would comply with the applicable goals and policies of the Otay Ranch GDP/SRP (Otay Subregional Plan Volume II) and the mitigation measures identified in the Otay Ranch Program EIR Landform Alteration/Aesthetics section. Therefore, impacts to compliance with applicable plans would be less than significant. Significance conclusion here.

## Section 4.6 Cumulative Impacts

While the Proposed Project Amendment would reduce the Development Footprint by approximately 230 acres compared to the Approved Project, in combination with the cumulative project's identified in the Final EIR, the Proposed Project Amendment would contribute to a cumulatively considerable impact to aesthetics and visual resources within the surrounding landscape that has resulted and will result in the substantial alteration of the visual character and quality of these areas. Say Significant and Unavoidable similar to the Approved Project

## Section 4.7 Comparison to Environmental Impact Report Land Use Alternative

With regard to the EIR Land Exchange Alternative, which was identified as the Environmentally Superior Alternative, the Final EIR determined the alternative would result in reduced visual impacts relative to the Approved Project. The Land Exchange Alternative would result in approximately 658 acres of development, which is 79 acres (or 13.7%) more development than the Proposed Project Amendment. Thus, as compared to the EIR Land Exchange Alternative, the Proposed Project Amendment would result in a reduced Development Footprint and thus would be less visible from surrounding areas.

## Section 5. Final EIR Mitigation Measures

The following mitigation measures were identified in the Final EIR for the Approved Project to reduce impacts to aesthetics and visual resources:

- M-AE-1** Stationary construction sites, staging, and storage areas within the Project Area shall be visually screened using temporary screening fencing. Fencing shall be of an appropriate design and color for each specific location to minimize the visibility of stationary construction sites, staging, and storage areas from off-site residential viewing locations.
- M-AE-2** The applicant, or its designee, shall prepare a Landscape Master Plan. The Landscape Master Plan shall demonstrate compliance with Otay Ranch General Development Plan/Otay Subregional Plan policies pertaining to the use of landscape materials that are complementary to the existing natural setting and that reflect the natural environmental. The Landscape Master Plan shall also demonstrate compliance with San Diego County General Plan Conservation and Open Space Element policies pertaining to the minimization of visual impacts through implementation and use of appropriate scale, materials, and design to complement the surrounding natural landscape. In addition, the Landscape Master Plan shall be consistent and in compliance with the Fire Protection Plan, the Preserve Edge Plan, the Water Conservation Plan, and the design guidelines specified in the Specific Plan. The Landscape Master Plan shall identify phasing of the Proposed Project and shall be consistent with the phasing plan included in the Specific Plan. The Landscape

Master Plan shall be approved by the Director of Planning & Development Services (or his/her designee) prior to the issuance of grading permits.

The Final EIR determined that, even with implementation of **M-AE-1** and **M-AE-2**, the project-specific and cumulative impacts of the Approved Project (**Impacts AE-1, AE-2, and AE-CUM-1**) would be significant and unavoidable. Overriding considerations were adopted by the Board of Supervisors for the Approved Project. The Proposed Project Amendment would implement the same two mitigation measures. Nevertheless, even with implementation of the mitigation measures, these impacts to of the Proposed Project Amendment would remain significant and unavoidable.

## Section 6. Conclusion

The Proposed Project Amendment's impacts to scenic vistas, light and glare, and compliance with applicable plans would be less than significant.

Although the impacts to visual character and quality from the Proposed Project Amendment would be reduced in comparison to the Approved Project, the impacts are considered significant and unavoidable. The impacts would not be new and do not substantially increase the severity of the impacts previously identified in the certified Final EIR for the Approved Project. Further, the same mitigation measures (**M-AE-1** and **M-AE-2**), requiring screening of construction sites and preparation of a Landscape Master Plan, would be implemented under the Proposed Project Amendment.

In summary, the Proposed Project Amendment, when compared to the Approved Project, would concentrate development in Proctor Valley and substantially limit development adjacent to rural residences in the unincorporated community of Jamul. Consequently, the Proposed Project Amendment's viewshed impacts would be reduced relative to the Approved Project. Both the Proposed Project Amendment and Approved Project would result in significant and unavoidable impacts to existing visual character and quality. However, as compared to the Approved Project, the Proposed Project Amendment, including its visually prominent features, would be less visible to off-site receptors in Chula Vista and Jamul. For these reasons, the impacts to aesthetics and visual resources of the Proposed Project Amendment would be reduced compared to those of the Approved Project.

The Proposed Project Amendment would not result in any new significant impacts or substantially more severe impacts to aesthetics and visual resources compared to those identified in the Approved Project's certified Final EIR. No new mitigation measures beyond those included in the Approved Project's Mitigation Monitoring and Reporting Plan are necessary for the Proposed Project Amendment's Mitigation Monitoring and Reporting Plan.