

## MEMORANDUM

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**To:** Mr. Greg Mattson, Project Manager, County of San Diego  
**From:** Sean Kilkenny, under the direction and supervision of Shawn Shamlou, Dudek  
**Subject:** Agricultural Resources Technical Memorandum for the Otay Ranch Village 14 and Planning Area 16/19 Proposed Project Amendment  
APNs #597-020-06; 597-020-10; 597-130-13; 597-140-04; 597-140-05; 597-140-06; 597-140-07; 597-150-13; 597-150-03; 597-150-12; 597-150-07; 597-150-08; 597-190-23; 598-010-02; 598-011-01; 598-020-04; 598-020-06; 598-021-01; 598-021-02; 598-070-07; 598-070-09  
**Date:** December 2, 2019  
**cc:** GDCI Proctor Valley L.P.  
**Attachment(s):** Attachment A, Agricultural Plan

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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 157 units, for a total of 1,266 residential units; and reduce impacts by approximately 230 acres, to 579 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 agricultural resources in Section 2.2, Agricultural Resources. This Agricultural Resources 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 agricultural 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 agricultural resources, (4) analysis of the Proposed Project Amendment's impacts to agricultural 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 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.

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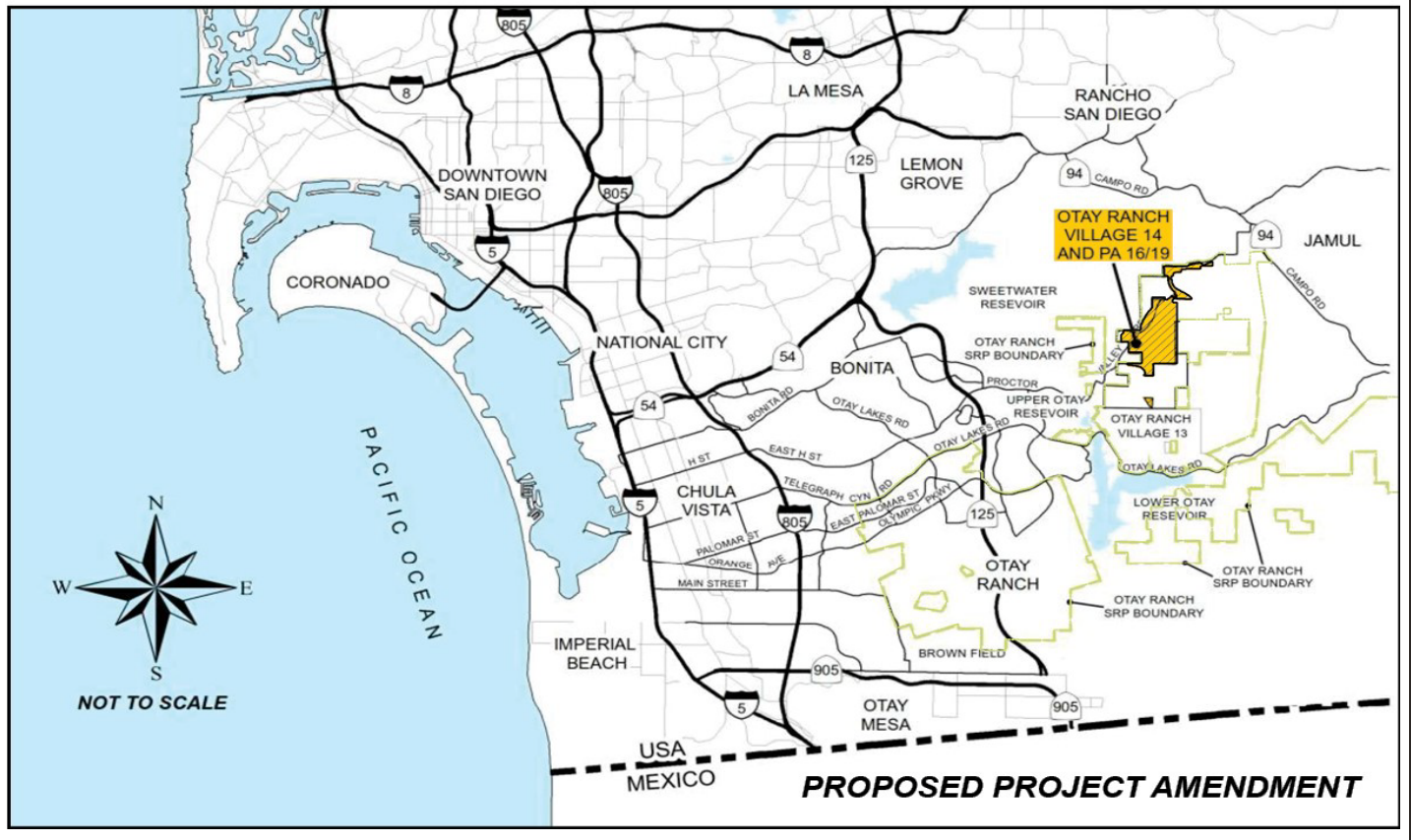
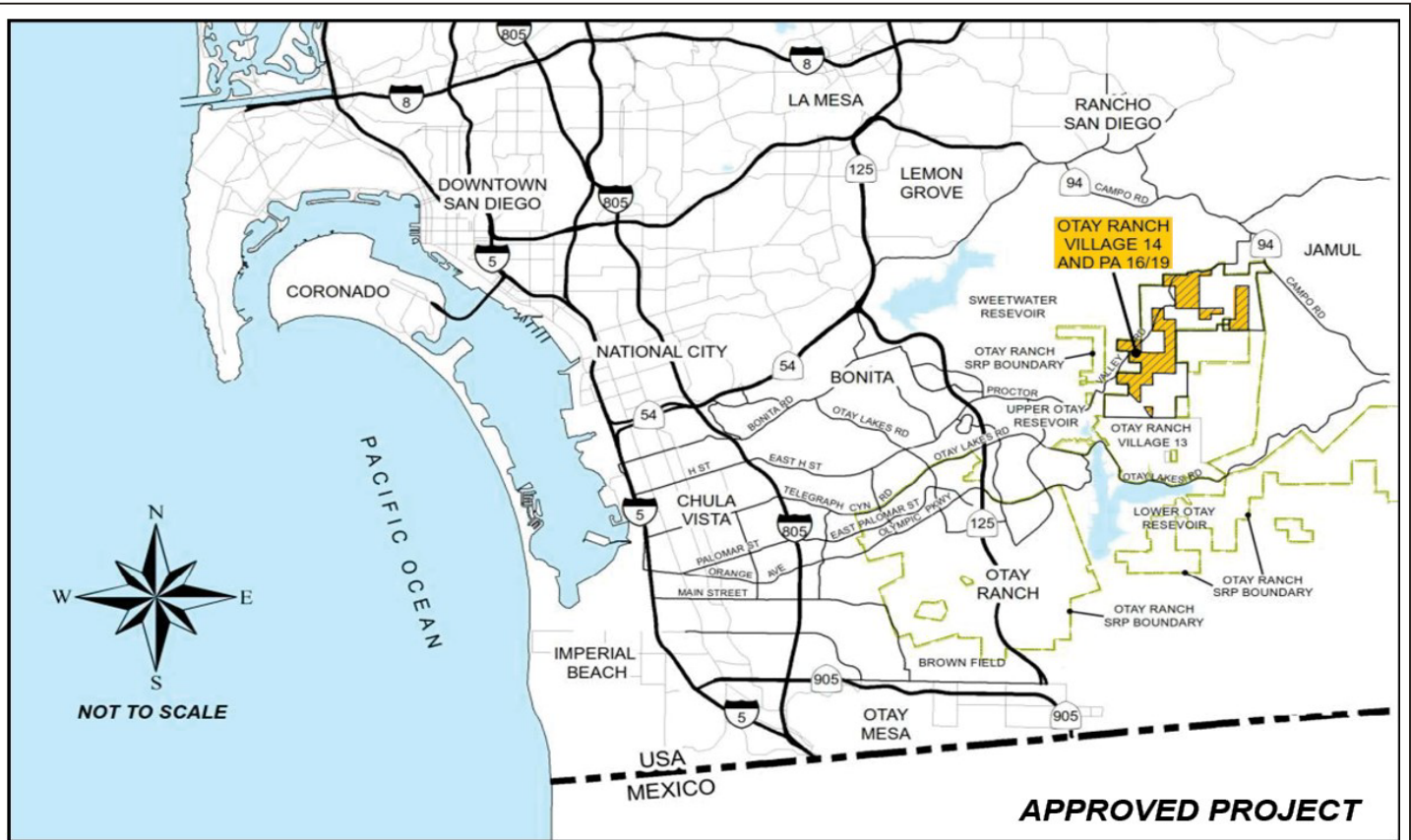
<sup>1</sup> As indicated above, the land exchange necessary to implement the Proposed Project Amendment must be approved by the California Wildlife Conservation Board.

**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 230 acres, to a total of 579 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.

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

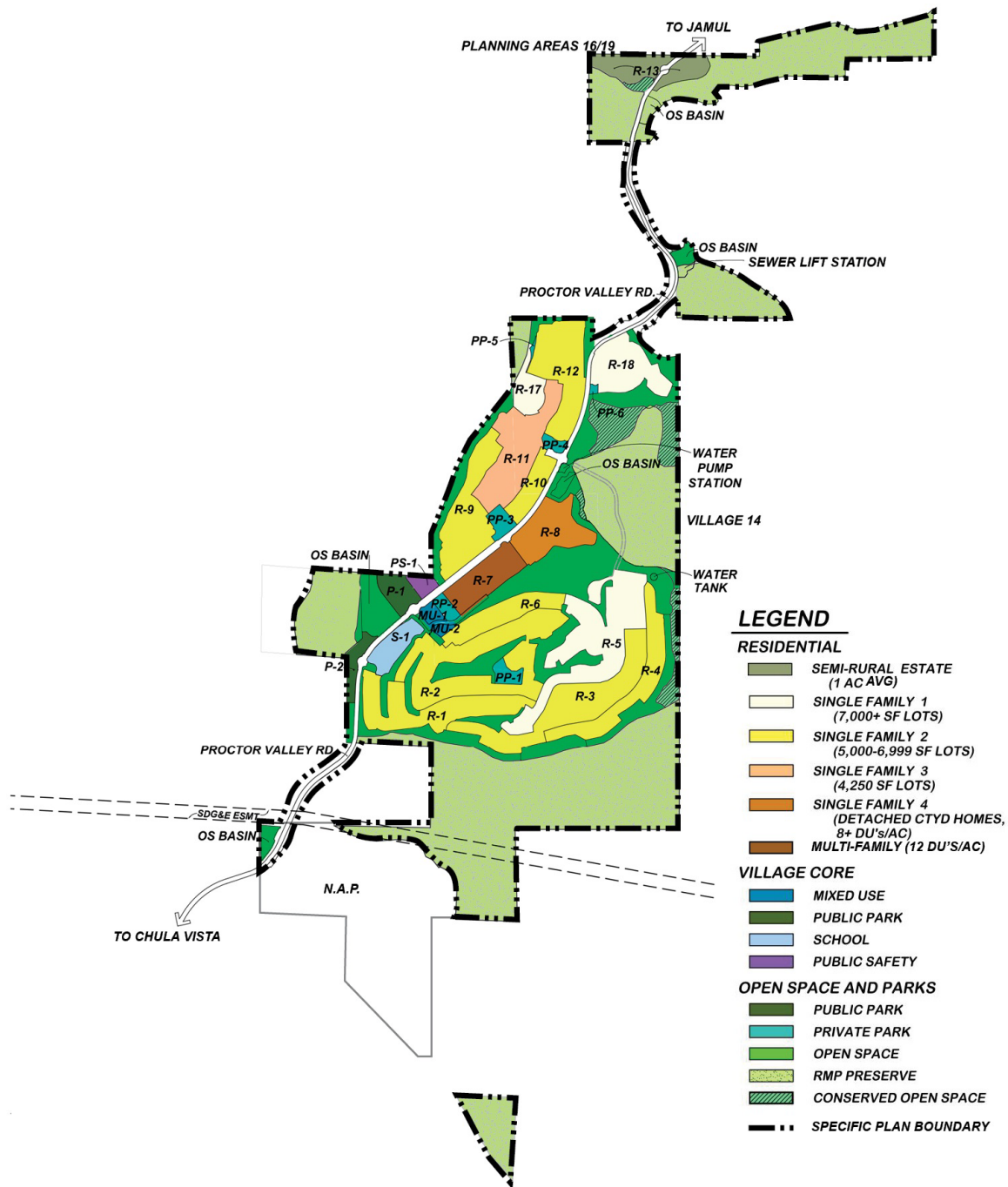


SOURCE: Hunsaker 2019

**FIGURE 1**

Regional Location

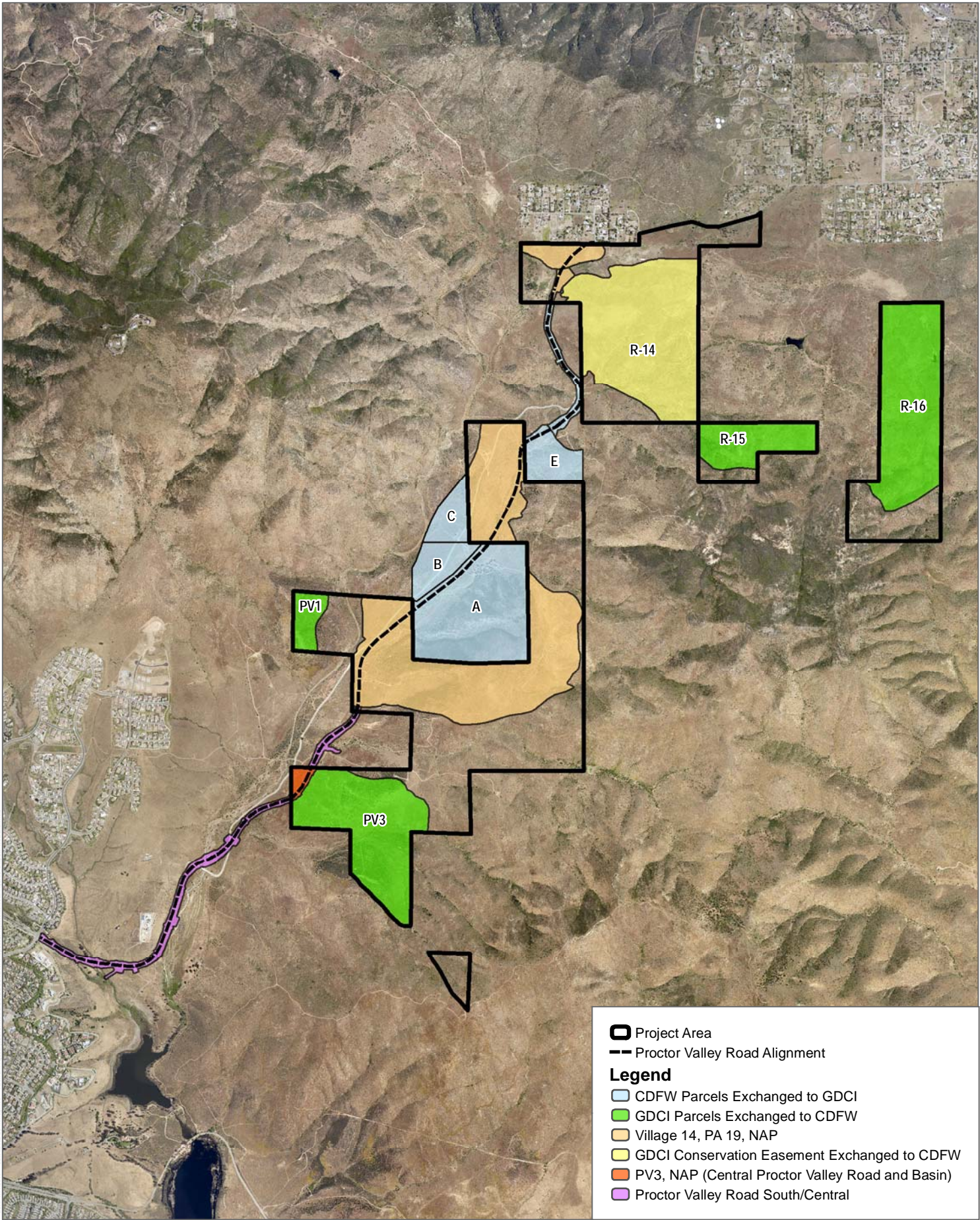
Otay Ranch Village 14 and Planning Areas 16/19 Proposed Project Amendment



SOURCE: Hunsaker 2019

**FIGURE 2**





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>
Other Off-sites						
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		

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

Description	Gross Acres <sup>(1,2)</sup>	Units <sup>(3)</sup>	Density
Conserved Open Space	23.0		
Otay Ranch RMP Preserve	274.9		
Circulation - In Preserve	3.7		
Circulation - Arterial	23.3		
<i>Non-Residential Uses Subtotal</i>	<i>407.2</i>		
<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>	<i>14.9</i>	<i>13</i>	<i>0.9</i>
<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>	<i>105.0</i>		
<i>Planning Area 19 Subtotal</i>	<i>119.8</i>	<i>13</i>	<i>0.1</i>
<b>Proposed Project Amendment Total <sup>(2)</sup></b>	<b>913.6</b>	<b>1,266</b>	<b>1.4</b>
<b>OTHER</b>			
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>	<i>589.5</i>		



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

<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.

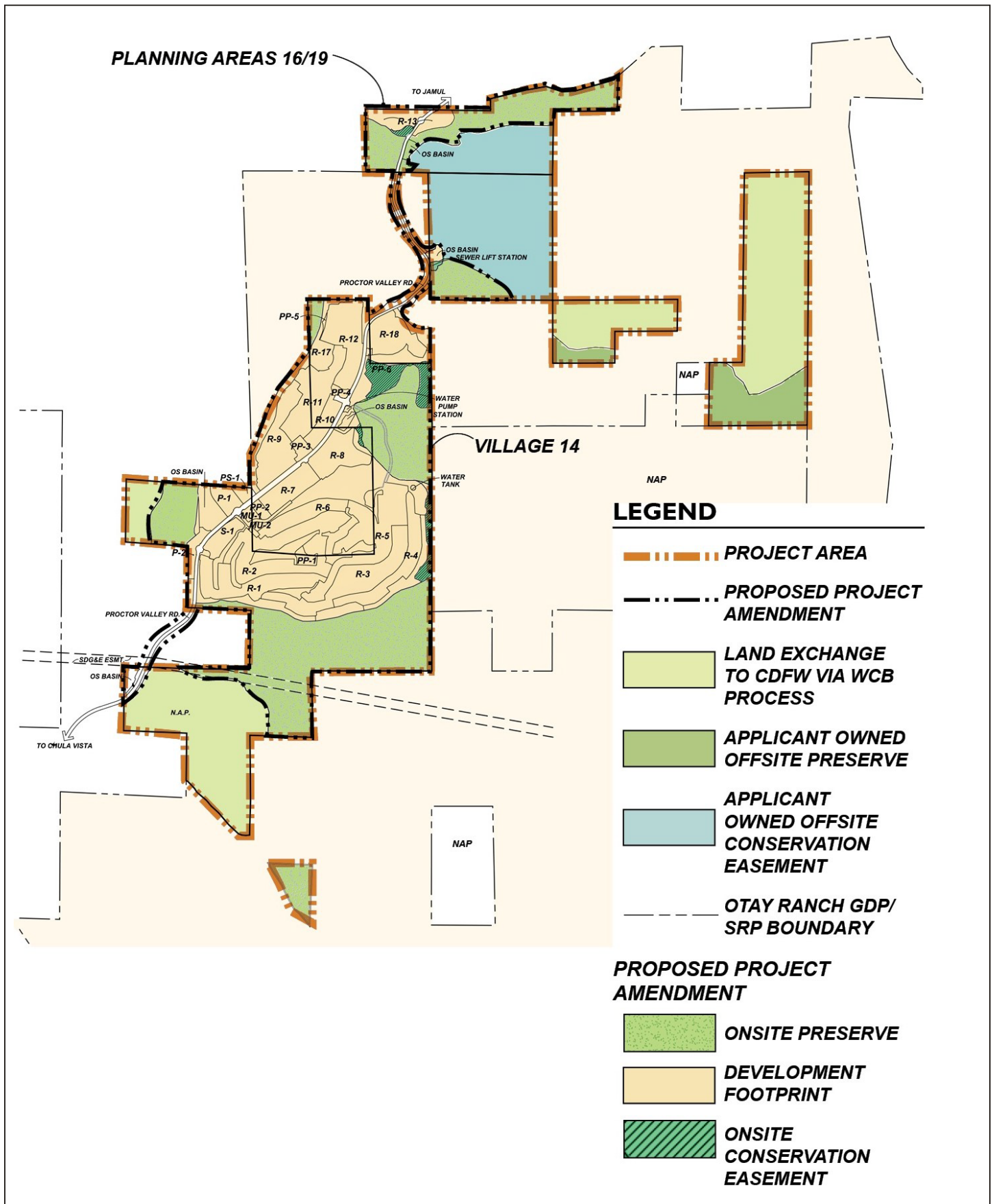
<sup>2</sup> Totals may not sum due to rounding

**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**

<b>Description</b>	<b>Proposed Project Amendment</b>	<b>Approved Project</b>	<b>EIR Land Exchange Alternative</b>
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



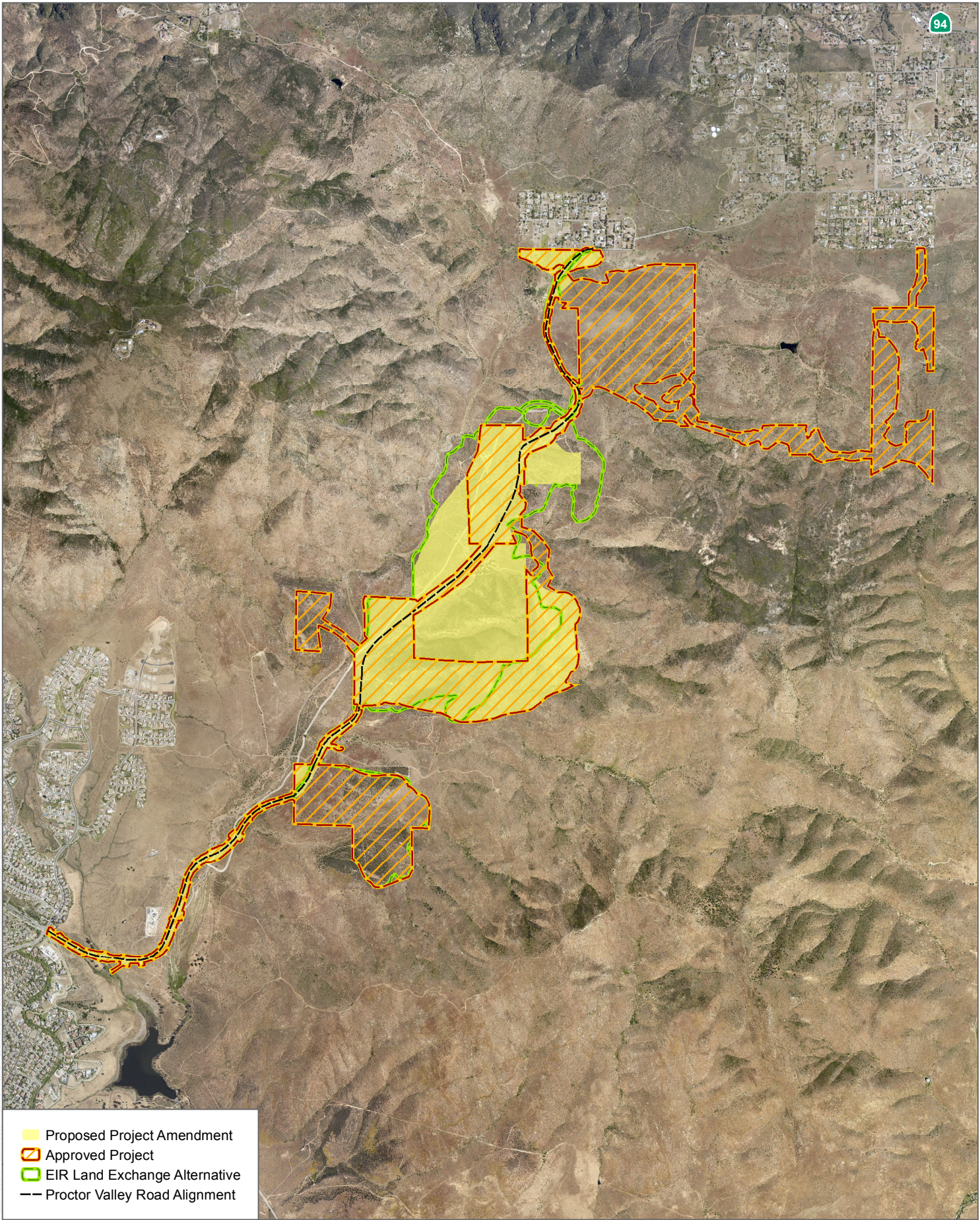
SOURCE: Hunsaker 2019

**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 Agricultural Resources

To provide the appropriate context to compare the impacts of the Proposed Project Amendment with the impacts anticipated under the Approved Project, this section provides a summary of the Approved Project's Certified EIR findings related to agricultural resources. Section 4 describes the impacts of the Proposed Project Amendment and compares the anticipated impacts against the Approved Project and the EIR Land Exchange Alternative.

Based on the location of Otay Ranch within a coastal climate zone, the 1993 Otay Ranch Program EIR (PEIR) determined that the conversion of agricultural land to non-agricultural uses (e.g., residences) would constitute a significant impact.

As described in the Final EIR, agricultural resources—and therefore the significance of impacts to such resources—are evaluated through the Local Agricultural Resources Assessment (LARA) Model. The LARA model 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).

The Final EIR determined that the Approved Project Area is not an “important” agricultural resource as that term is defined under the LARA model. Specifically, the LARA model analysis determined that the Approved Project Area was not an important agricultural resource because it failed under Scenario 5 in Table 2.2-2 of the Final EIR, with the required factors of water resources and soil quality receiving low ratings. Scenario 5 states that when at least one factor is rated low importance, then the site is not an important agricultural resource. Nonetheless, the Approved Project Area contains lands that support, or supported in the past, ranching and farming activities. Specifically, the Approved Project Area included 666.7 acres of land designated as Grazing Land and 69.6 acres of land designated as Farmland of Local Importance. In addition, the Approved Project Area is located in Sunset Climate Zone 23, which is one of Southern California's coastal climates as described in the Final EIR (see page 2.2-10 of the Final EIR).

Thus, even though the Approved Project Area did not include prime agricultural soils and was no longer used for crops or grazing land, the Approved Project Final EIR concluded that approximately 69.6 acres of coastal crop land designated as Farmland of Local Importance would be converted to residential uses. Consistent with the findings in the Otay Ranch PEIR, this incremental loss of coastal Farmland of Local Importance would be a potentially significant impact (**Impact AG-1**).

The Otay Ranch PEIR also determined that the incremental and cumulative loss of agricultural lands as a result of development of Otay Ranch was a significant impact. When combined with the other cumulative considerable projects (see Figure 1-16 in Chapter 1 of the Final EIR), which also involve conversion of agricultural resources into suburban uses, the Final EIR determined the Approved Project would contribute to a cumulatively considerable impact (**Impact AG-CUM-1**) to agricultural resources.

### Section 3.1 Environmental Impact Report Land Exchange Alternative

For additional context, the Final EIR determined that the EIR Land Exchange Alternative would disturb approximately 22.4 acres of land designated as Farmland of Local Importance and 613.1 acres of land designated as Grazing Land, compared to 666.7 acres of land designated as Grazing Land and 69.6 acres of land designated as Farmland of Local Importance impacted by the Approved Project. However, due to its location in a coastal area climate zone, and because the EIR Land Exchange Project Area contained soils designated as Farmland of Local Importance, similar to the Approved Project, it would also represent a project-specific impact (**Impact AG-1**) and cumulatively considerable contribution to a significant cumulative impact (**Impact AG-CUM-1**). Although the EIR Land Exchange Alternative would not reduce impacts on Grazing Land and Farmland of Local Importance to less than significant, it would reduce impacts to agricultural resources compared to the Otay Ranch GDP/SRP PEIR and the Approved Project by approximately 40 acres and impacts to grazing land by approximately 22.6 acres. Impacts to agricultural resources would remain significant and unavoidable.

## Section 4. Proposed Project Amendment Impacts to Agricultural Resources

The Proposed Project Amendment is located in the same general location as the Approved Project and would result in impacts to approximately 579 acres. Similar to the Approved Project, the Proposed Project Amendment Project Area is not an “important” agricultural resource; however, the Proposed Project Amendment Project Area contains lands that support, or supported in the past, ranching and farming activities. Specifically, the Proposed Project Amendment would impact 498.4 acres of land designated as Grazing Land and 24.6 acres of land designated as Farmland of Local Importance. In addition, similar to the Approved Project, the Proposed Project Amendment Project Area is located in Sunset Climate Zone 23, which is one of Southern California’s coastal climates. Table 5 compares the impacts of the Proposed Project Amendment and Approved Project to agricultural resources.

**Table 5. Summary of Impacts to Agricultural Resources**

Agricultural Resource	Proposed Project Amendment	Approved Project	EIR Land Exchange Alternative
Farmland of Local Importance	24.6	69.6	22.6
Grazing Land	498.4	666.7	613.1

As explained in Section 3 and shown in Figure 3, the Proposed Project Amendment would conserve areas previously identified for development under the Otay Ranch GDP/SRP and analyzed in the Otay Ranch PEIR. Specifically, the Proposed Project Amendment would place approximately 191.5 acres of Planning Area 16 into a conservation easement and would not develop 147.3 acres of Village 14 (commonly referred to as PV1 and PV3) and approximately 192.4 acres of Planning Area 16 (formerly R-15 and R-16 in the Approved Project). Thus, the Proposed Project Amendment would reduce impacts to agricultural resources compared to the Otay Ranch GDP/SRP PEIR and Approved Project.

However, even though the Proposed Project Amendment Project Area would not include prime agricultural soils, is no longer used for crops or grazing land, and would result in fewer impacts compared to the Approved Project (see Biological Resources Equivalency Memo for the Proposed Project Amendment), approximately 45 acres of coastal crop land designated as Farmland of Local Importance would be converted to residential uses. Consistent with the findings in the Otay Ranch PEIR and the Approved Project Final EIR, this incremental loss of coastal Farmland of Local Importance would be a potentially significant impact (**Impact AG-1**).

As described in Section 2, the Otay Ranch PEIR and Approved Project Final EIR also determined the incremental and cumulative loss of agricultural lands as a result of development of Otay Ranch was a significant impact. When combined with the other cumulative considerable projects (see Figure 1-16 in Chapter 1 of the Final EIR), which also involve conversion of agricultural resources into suburban uses, the Proposed Project Amendment would contribute to a cumulatively considerable impact (**Impact AG-CUM-1**) to agricultural resources.

## Section 5. Final EIR Mitigation Measures

The 1993 Otay Ranch PEIR and Mitigation Monitoring Program identified mitigation measures to reduce the significant agricultural resources impacts of the Otay Ranch GDP/SRP. The Approved Project Final EIR analyzed the specific impacts of the Approved Project on agricultural resources, accounting for changes in conditions, both environmental and regulatory, that occurred since 1993 when the Otay Ranch PEIR was certified. The Final EIR determined that the agricultural resources mitigation measures identified in the Otay Ranch PEIR were either (1) not applicable, (2) satisfied, or (3) replaced with project-specific mitigation measures or regulatory compliance requirements. Based on the analysis contained in Section 2.1 of the Final EIR, the following mitigation measure was identified to reduce indirect and cumulative impacts to agricultural resources:

**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 determined that there are no feasible mitigation measures to reduce agricultural impacts to below a level of significance. As stated in the Otay Ranch PEIR, the loss of agricultural land capable of supporting coastal-dependent crops was considered a significant, unmitigable impact regardless of the feasibility of maintaining the land in agricultural production (e.g., because of the lack of water resources), and overriding considerations were adopted for the Otay Ranch GDP/SRP. Similarly, the project-specific and cumulative impacts of the Approved Project (**Impact AG-1** and **Impact AG- CUM-1**) were determined to be significant and unavoidable and overriding considerations were adopted for the Approved Project.



## Section 6.Conclusion

Overall impacts to Agricultural Resources would be reduced under the Proposed Project Amendment compared to the Approved Project as shown in Table 5. While the impacts to 24.6 acres of Farmland of Local Importance/coastal dependent crops identified in Section 4 are considered significant, they would not be new or significantly greater impacts than those the Approved Project Final EIR anticipated. Further, the same mitigation measure (**M-AG-1**) requiring the preparation of the Agricultural Plan would be implemented under the Proposed Project Amendment.

Because the Proposed Project Amendment would not result in any additional or more severe impacts to agricultural resources than those identified for 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.

## Section 7.References

County of San Diego. 2006a. "County Water Authority (CWA) Boundary and Groundwater Aquifer Types."  
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# Attachment A

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Agricultural Plan

# *Agricultural Plan*

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OTAY RANCH  
VILLAGE 14 AND PLANNING AREAS 16/19  
Specific Plan - Appendix 8

December 2019





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## I. INTRODUCTION

The 1993 Otay Ranch Program EIR requires the preparation of an Agriculture Plan concurrent with the approval of any SPA affecting onsite agricultural resources. The Findings of Fact state that the Agricultural Plan shall indicate the type of agriculture activity being allowed as an interim use including 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.

Historically, the Proposed Project Amendment 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 Proposed Project Amendment Area. Land used for agricultural activities in areas surrounding the Proposed Project Amendment Area has decreased over the years. Substantial farmland has been converted to urban uses 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 have contributed to the fact that large-scale agricultural activities in the Project Area ceased in 1999. Since that time, only periodic and limited farming and grazing activities have continued in some areas of Otay Ranch, but not within the Proposed Project Amendment Area. See Draft-Approved EIR-Project Environmental Impact Report (EIR) 16-010-006 Section 2.2, Agricultural Resources, and the Addendum to EIR 16-010-006 prepared for the Proposed Project Amendment for additional information.

## II. PHASED ELIMINATION OF AGRICULTURAL USES

### Grazing

The Otay Ranch Resource Management Plan includes a Range Management Plan that is administered by the Otay Ranch Preserve Owner/Manager (POM). The purpose of the Range Management Plan is to provide a framework for the coordinated control of grazing within the MSCP Preserve. Grazing no longer occurs within the Project Area.

Farming

Land utilized for agricultural activities in properties surrounding the Project Area has decreased in recent years. Factors that have led to the decrease in agricultural use include the conversion of farmland into urban uses as a result of increases in property taxes and the high cost of importing water. The phased development of the Proposed Project would incrementally convert the Project Area to urban development.

Consistent with the Otay Ranch GDP/SRP, the following agricultural standards will be employed should the property owner or subsequent owner(s) desire to farm on-site prior to development of the Project Area:

- A 200-foot distance buffer shall be maintained between developed property and ongoing agricultural operations. Use of pesticides shall comply with federal, state and local regulations.
- In those areas where pesticides are to be applied, vegetation shall be utilized to shield adjacent urban development (within 400 feet) from agricultural activities.
- The Applicant shall notify adjacent property owners of potential pesticide application through advertisements in newspapers of general circulation.
- Where necessary to ensure the safety of area residents, appropriate fencing shall be utilized.