

## MEMORANDUM

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**To:** Mr. Gregory Mattson, Project Manager, Planning and Development Services  
**From:** Sean Kilkenny, Dudek  
**Subject:** Otay Ranch Village 14 and Planning Areas 16/19 Proposed Project Amendment  
Secondary Access Road Option Memo  
**Date:** March 5, 2020  
**cc:** Liz Jackson, Jackson Pendo Development Company (JPDC)  
Rob Cameron, JPDC  
David Hubbard, Gatzke Dillon & Ballance

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### Introduction

Subsequent to public distribution of the Specific Plan Amendment and Revised Tentative Map, the Wildlife Agencies requested that the project applicant consider alternative designs to the proposed secondary access road to Village 14 and the water transmission main/reservoir within the Otay Ranch RMP/MSCP Preserve. The water transmission line, water reservoir and associated access road are allowed facilities in the Otay Ranch RMP Preserve and the County MSCP Subarea Plan. The project applicant has responded to that request and prepared an optional design for the secondary access road designated as Street "I" on the Revised Tentative Map (Access Road Option). The access road is required for the Otay Water District water transmission line, access to the 980-Zone regional water reservoir facility, and also provides secondary fire access for Village 14. This Access Road Option would remove nearly all of the access road from the Otay Ranch RMP/MSCP Preserve. Compared to the secondary access road included in the project approved by the County Board of Supervisors on June 26, 2019 (the "Approved Project") and incorporated into the EIR Addendum, the Access Road Option would reduce impacts to the Otay Ranch RMP/MSCP Preserve by 8.3 acres (5.0 of permanent impacts and 3.3 of temporary impacts). Figure 1 depicts the Access Road Option.<sup>1</sup>

Importantly, Access Road Option does not alter the number and square footage of residential units and non-residential uses assessed in the EIR Addendum. Therefore, the Access Road Option does not change the total average daily traffic (ADT) generated by the proposed project, and the associated operational impacts related to ADT and vehicle miles traveled (VMT), including operational air quality and GHG emissions, energy usage, and noise impacts.

The Access Road Option is incorporated into the Proposed Project Amendment's Revised Tentative Map and Specific Plan Amendment. The following analysis contemplates the Access Road Option and evaluates whether and to what extent it would result in any new significant environmental impacts, or increase the severity of any significant impacts identified in the EIR Addendum. Based on the analysis provided below, the

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<sup>1</sup> The access road (Street I) is an approved facility in the RMP preserve.

Access Road Option does not give rise to any new or more severe significant environmental impacts, and further minimizes impacts when compared to the Approved Project.

## Aesthetics

The Access Road Option would shift most of the access road facility from the Otay Ranch RMP/MSCP Preserve into non-Preserve areas; however, this shift in the road location would not significantly change the visual appearance of the Proposed Project Amendment and the same mitigation measures would apply. Therefore, no new or refined analysis is required or provided and the impacts to aesthetics and visual resources would remain unchanged compared to those analyzed in the EIR Addendum.

## Agricultural Resources

The Access Road Option would shift most of the access road from the Otay Ranch RMP/MSCP Preserve into non-Preserve areas; however, this shift in the road location would not significantly change impacts to coastal dependent crop lands designated as Farmland of Local Importance, and the same mitigation measures would apply. Therefore, no new or refined analysis is required or provided and the impacts to aesthetics and visual resources would remain unchanged compared to those analyzed in the EIR Addendum.

## Air Quality, GHG Emissions and Energy

Construction air quality and GHG emissions and energy usage would be slightly reduced under the Access Road Option as the total amount of earthwork would be similar to the grading quantities analyzed in the EIR Addendum. Specifically, rough earthwork calculations prepared by Hunsaker Engineering indicate the Access Road Option would change the Village 14 grading fill quantity by approximately 375,000 Cubic Yards (CY), when compared to grading fill volumes described in the EIR Addendum. As a result, there would be a lowering of approximately one foot over portions of the Development Footprint to adjust for the change; however, the overall cut/fill quantities are not expected to materially change. Therefore, the Access Road Option's construction-related Air Quality impacts and GHG emissions would be similar to those analyzed and disclosed in the EIR Addendum, and no new analysis is required or provided.

As to operational emissions, as noted under in the Summary, above, and Transportation, below, the Access Road Option would not alter total ADT, as it would not change the type, intensity, or density of uses contemplated in the Proposed Project Amendment and studied in the EIR Addendum. Therefore, mobile source emissions and petroleum usage would be the same as those disclosed in the EIR Addendum.

In addition, the number and square footage of residential units and non-residential uses is the same under the Access Road Option as those analyzed under the EIR Addendum; therefore, the non-mobile source operational emissions and energy usage would be the same as those analyzed by the EIR Addendum. Overall, impacts to air quality would remain significant and unavoidable, but would be less than the EIR Addendum. Impacts to Greenhouse Gas Emissions would be reduced and would remain less than significant with implementation of M-GHG-1 through M-GHG-4. Impacts to energy usage would remain less than significant.

## Biological Resources

By removing most of the road from the Otay Ranch RMP/MSCP Preserve, the Access Road Option would reduce impacts to the Preserve from 12.6 acres to 4.3 acres, a net reduction of 8.3 acres when compared to the Approved Project studied in the Final EIR and the Proposed Project Amendment studied in the EIR Addendum (see Table 1). The same mitigation measures set forth in the EIR Addendum would be implemented to address the impacts of the Access Road Option. The only difference is that the amount/magnitude of the impacts have been reduced by the redesign. Accordingly, impacts to biological resources would be reduced compared to those disclosed in the EIR Addendum and when compared to the Approved Project, and no new or refined analysis is required or provided.

**Table 1. Comparison of RMP Preserve Impacts Related to the Road Redesign**

Impact	Vegetation Community	Impacts Associated with Current Road Alignment	Impacts Associated with Optional Road Alignment	Reduction of Impacts to Habitat in the Preserve
Temporary	Chamise Chaparral	0.9	0.6	-0.3
	Cismontane Alkali Marsh	<0.1	-	-
	Coastal Sage Scrub	1.4	1.3	-0.1
	Coastal Sage Scrub (disturbed)	3.1	0.2	-2.9
	Disturbed Habitat	0.1	0.1	-
	<i>Subtotal</i>	5.4	2.2	-3.3
Permanent	Chamise Chaparral	2.9	1.1	-1.8
	Cismontane Alkali Marsh	<0.1	-	-
	Coastal Sage Scrub	1.3	0.6	-0.7
	Coastal Sage Scrub (disturbed)	2.9	0.4	-2.5
	Disturbed Habitat	<0.1	<0.1	-
	<i>Subtotal</i>	7.1	2.2	-5.0
<b>Total Impacts</b>		<b>12.6</b>	<b>4.3</b>	<b>-8.3</b>

## Cultural and Tribal Cultural Resources

The Access Road Option would shift most of the access road from Otay Ranch RMP/MSCP Preserve into non-Preserve areas. The impacts would be less than significant because they would occur in areas that where there are no known surface manifestations of cultural and/or tribal cultural resources. The same mitigation measures (MM-CUL-1 and MM-CUL-2 from the EIR Addendum) would be implemented to ensure impacts to unknown archaeological resources and tribal cultural resources, or the disturbance of human remains, would remain less than significant. No additional mitigation measures would be required. Accordingly, the impacts would be the same as those disclosed in the EIR Addendum, and no new or refined analysis is required or provided to address the cultural and tribal cultural resources impacts.

## Geology and Soils

The Access Road Option would be constructed within similar geologic and soils conditions as those analyzed in the EIR Addendum. The same mitigation measures (M-GE-1) would be implemented to ensure impacts remain less than significant. No additional mitigation measures would be required. Accordingly, the impacts would be the same as those disclosed in the EIR Addendum, and no new or refined analysis is required or provided.

With respect to grading volume, rough earthwork calculations prepared by Hunsaker Engineering indicate the Access Road Option would change the Village 14 grading quantity by approximately 375,000 Cubic Yards (CY). Making adjustments for this type of a design change over 500-acres of grading on the Development Footprint is anticipated to result in a slight, approximately one foot, lowering of the graded elevations to achieve cut-fill balance. Hunsaker Engineering anticipates that this grading adjustment will not cause additional impacts and can be done within the previously-analyzed Development Footprint and the County's requirements for substantial conformance during final engineering. Similar geotechnical recommendations would be required under a Final Grading Evaluation as required under M-GE-1 and impacts would be reduced to less than significant.

## Hazards and Hazardous Materials

The Access Road Option would shift most of the access road from Otay Ranch RMP/MSCP Preserve into non-Preserve areas. The Access Road Option would be constructed within the same development areas analyzed under the Approve Project FEIR for the Approved Project and EIR Land Exchange Alternative and would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; production of hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school; location on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 creating a hazard to the public or the environment. The construction of the Access Road Option would not result in the potential for exposure to hazardous materials. The location of the Access Road Option does not increase wildfire hazards or interfere with an adopted emergency response plan. And the Access Road Option would not change the location of any homes in proximity to an airfield. Accordingly, impacts to hazards and hazardous materials would be the same as those disclosed in the EIR Addendum, and no new or refined analysis is required or provided.

## Hydrology and Water Quality

The Access Road Option does not materially increase the amount of impervious surfaces or otherwise alter the road's contribution to stormwater impacts. Construction under the Access Road Option would be subject to the same Construction General Permit (CGP) requirements as analyzed under the EIR Addendum, including filing a Notice of Intent to the State Water Resources Control Board in order to obtain approval to complete demolition and construction activities under the CGP. This permit requires the discharger to perform a risk assessment for the proposed development (with differing requirements based upon the determined level) and to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP). A Construction Site

Monitoring Program that identifies monitoring and sampling requirements during construction would be a required component of the SWPPP, as would construction-phase best management practices.

The Access Road Option would maintain the water quality treatment system analyzed in the EIR Addendum. The same Municipal Separate Storm Sewer System (MS4) Permit requirements would be achieved. Accordingly, the impacts to hydrology and water quality would be the same as those disclosed in the EIR Addendum, and no new or refined analysis is required or provided.

## Land Use and Planning

The Access Road Option would not change the number of dwelling units or amount of square footage of residential and non-residential uses analyzed in the EIR Addendum. Nor would it require any change to existing land use or zoning designations. Accordingly, the Access Road Option would maintain the same uses as the Proposed Project Amendment, which would be consistent with the County General Plan, Otay Ranch GDP/SRP; and the County MSCP Subarea Plan. The impacts to land use and planning would be the same as those disclosed in the EIR Addendum, and no new or refined analysis is required or provided.

## Mineral Resources

The Access Road Option would shift most of the access road from Otay Ranch RMP/MSCP Preserve into non-Preserve areas. The impacts would occur within similar Mineral Resources Zones as those analyzed in the EIR Addendum and would remain less than significant. No additional mitigation measures would be required. Accordingly, impacts to mineral resources would be the same as those disclosed in the EIR Addendum, and no new or refined analysis is required or provided.

## Noise

The Access Road Option would not change any of the anticipated construction techniques as those analyzed in the EIR Addendum or result in construction closer to sensitive receptors than the nearest noise sensitive land uses analyzed in the EIR Addendum. Therefore, construction-related noise impacts would remain the same as those analyzed in the EIR Addendum, and no new or refined analysis is required or provided.

Relative to operational noise levels, the same land uses and intensity of development would be implemented as those analyzed in the EIR Addendum; therefore, impacts related to stationary noise sources would be the same and no new or refined analysis is required or provided. Further, the total project ADT and trip distributions would be the same as analyzed in the EIR Addendum, therefore, off-site traffic noise would remain the same.

## Paleontological Resources

The Access Road Option would be constructed within similar soil sensitivity conditions as those analyzed in the EIR Addendum. The same mitigation measures (M-PAL-1) would be implemented to ensure impacts remain less than significant. No additional mitigation measures would be required. Accordingly, the impacts to paleontological resources would be the same as those disclosed in the EIR Addendum, and no new or refined analysis is required or provided.

## Population and Housing

The Access Road Option would not change the number of dwelling units or amount of square footage of residential and non-residential uses compared to those analyzed in the Draft EIR. Accordingly, the impacts to population and housing would be the same as those disclosed in the EIR Addendum, and no new or refined analysis is required or provided.

## Public Services and Recreation

The Access Road Option would not change the number of dwelling units or amount of square footage of residential and non-residential uses analyzed in the EIR Addendum. Therefore, the Access Road Option would not increase demand for fire and emergency medical services, law enforcement services, school services, library services, or parks and recreation facilities. Accordingly, impacts to Public Services and Recreation would be the same as those disclosed in the EIR Addendum and no new or refined analysis is required or provided.

## Transportation and Traffic

The Access Road Option would not change the number of dwelling units or amount of square footage of residential and non-residential uses; thus, the overall density and intensity of development would remain the same as analyzed in Addendum and the total project ADT would be the same. Therefore, transportation impacts would be the same as those presented in the EIR Addendum, and no additional analysis is provided or required.

## Utilities and Service Systems

The Access Road Option would not change the number of dwelling units or amount of square footage of residential and non-residential uses. Therefore, the total water demand, sewer generation, and solid waste generation would be the same as analyzed in the Draft EIR, and no new facilities, the impacts of which may result in significant impacts to the environment, would be required compared to the Proposed Project Amendment as analyzed in the EIR Addendum. Further, all storm drains would be designed to accommodate the anticipated runoff, which would be similar to the volumes presented in the EIR Addendum. Accordingly, the impacts to utilities and Service Systems would be the same as those disclosed in Addendum, and no new or refined analysis is required or provided.

## Summary

As discussed above, the Access Road Option does not give rise to any new or more severe significant environmental impacts, or result in any new mitigation measures previous determined to be infeasible.