

2.4 Biological Resources

This section of the SEIR analyzes the existing biological resources in the Project areas, including impacts to vegetation communities, sensitive plants and wildlife, and wildlife corridors.

2.4.1 Existing Conditions

The General Plan Update PEIR included a discussion of existing conditions related to biological resources in Chapter 2.4.1 of the Biological Resources chapter. The existing conditions addressed the entire unincorporated area, including former FCI lands covered by this proposed Project. The biological resource conditions described in the General Plan Update PEIR are the same as the conditions on the ground today. No changes to the existing conditions have been identified that would alter the conclusions in the PEIR. All references used in the General Plan Update PEIR (Chapter 6) were reviewed to ensure they are still valid today. In addition, the existing conditions for biological resources as discussed on page 2.4-1 in Section 2.4.1 of the General Plan Update PEIR, are hereby incorporated by reference.

2.4.2 Regulatory Framework

Chapter 2.4 of the General Plan Update PEIR, starting on page 2.4-13 describes the Regulatory Framework related to biological resources and is hereby incorporated by reference. Applicable Federal regulations discussed include the Endangered Species Act, Migratory Bird Treaty Act, Bald and Golden Eagle Protection Act, and Clean Water Act. State regulations include the California Fish and Game Code, Lake and Streambed Alteration Program, the Porter-Cologne Water Quality Control Act, and the Natural Community Conservation Planning Act of 1991. Local Regulations include the San Diego County Zoning Ordinance, Multiple Species Conservation Program, the Biological Mitigation Ordinance, Resource Protection Ordinance, Watershed Protection Ordinance, Habitat Loss Permit ordinance, and the Board of Supervisors Policy I-123 Conservation Agreement for the Multiple Species Conservation Program Plan.

With the exception of an update on the status of the North County and East County Multiple Species Conservation Programs (MSCPs) as described below, the regulatory framework discussion in the General Plan Update PEIR as it pertains to biological resources has not changed since adoption of the General Plan in August 2011. Therefore, the regulatory framework information is not repeated here.

2.4.2.1 *Local*

Multiple Species Conservation Program

The County is currently developing additional MSCP Plans for the North County and East County areas. The Draft North County Plan is a stand-alone habitat conservation program for unincorporated lands under the County's jurisdiction in the northwestern part of the County, from the coast eastward to Ramona and the western flanks of Palomar Mountain. It is intended

to create a 107,000-acre regional preserve system in northern San Diego County. Included are general measures and recommendations for managing plant communities and specific habitats for over 60 species. Development of the Draft East County Plan is currently on hold and there is no projected schedule for the East County Plan at this time.

2.4.3 Analysis of Proposed Project Effects and Cumulative Impacts

The cumulative impact analysis study area for biological resources in the General Plan Update PEIR was identified as the entire San Diego Region (Chapter 2.4, page 2.4-34). As the Proposed Project is applying 2011 General Plan principles to assign land use designations for the Project areas throughout the unincorporated County, the cumulative study area for biological resources is the same as the General Plan Update PEIR and is hereby incorporated by reference. In addition, Section 1.9 of this SEIR (Cumulative Project Assessment Overview), provides an update of new projects since adoption of the 2011 General Plan that are considered in the cumulative analysis in order to make the analysis complete.

2.4.3.1 Special Status Plant and Wildlife Species

This section describes direct, indirect and cumulative impacts on special status plant and wildlife species for the Project areas addressed in this SEIR.

Guidelines for the Determination of Significance

Based on Appendix G of the CEQA Guidelines, the proposed Project would result in a significant impact if it would have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or the US Fish and Wildlife Service (USFWS).

Impact Analysis

The General Plan Update PEIR evaluated impacts from the adoption of the goals and policies of the 2011 General Plan countywide, including FCI lands. In addition, the General Plan Update PEIR evaluated buildout of the land use designations applied throughout the unincorporated area with the exception of former FCI lands. The General Plan Update PEIR determined that buildout under the 2011 General Plan would result in potentially significant direct, indirect and cumulative impacts to special status species. This discussion of impacts can be found in Section 2.4 pages 2.4-19 through 2.4-24 of the PEIR and is hereby incorporated by reference. The PEIR also found that these impacts would be reduced through the implementation of a combination of federal, State and local regulations; existing County regulatory processes; the adopted 2011 General Plan goals and policies; and, specific mitigation measures/implementation programs identified in the General Plan Update PEIR; however, not to a level of insignificance.

This proposed Project consists of changes to the land use designations over 71,700 acres of land which support special status plant and wildlife species. Similar to the 2011 General Plan, the

project would directly or indirectly impact habitats of candidate, sensitive, or special status species. The General Plan Update PEIR included a discussion of each vegetation community in the unincorporated County and the species supported by each vegetation community in Section 2.4.1.2 of the General Plan Update PEIR. Table 2.4-1 (Habitat Impacts by Vegetation Community) ~~quantifies~~ compares the total number of acres of each vegetation community with the number of acres that could be potentially affected by new development under the proposed Project. The majority of the impacts are expected to occur within scrub and chaparral, woodland and forest vegetation communities, with lesser impacts occurring on riparian and bottomland habitat, grasslands, vernal pools, meadows and other herb communities. The species that occupy these habitats are the same as those identified in the General Plan Update PEIR and can be found in section 2.4.1.4, pages 2.4-2 to 2.4-9, under each vegetation description. Appendix C of the General Plan Update PEIR, Table C1, Special Status Plant Species with a Potential to Occur within San Diego County and Table C2, Special Status Wildlife Species with a Potential to Occur within San Diego County is hereby incorporated by reference.

Figures 2.4-1A and 2.4-1B illustrates the location of the vegetation communities within the Project area boundary and estimates of the vegetation impacts are shown in Figure 2.4-2A and 2.4-2B in addition to Table 2.4-1. Also, community level figures of the estimated vegetation impacts are provided as Figures 2.4-4.1 through 2.4-4.13 (Estimated Vegetation Impacts). Methodology used to estimate vegetation impacts is the same as that used in the General Plan Update PEIR and is repeated in the following Section. Similar direct, indirect and cumulative effects would occur with future development of the Project areas addressed in this SEIR, which could result in substantial adverse effects on habitats supporting special status plant and wildlife species from ground disturbing activities (such as grading and excavation) in previously undeveloped lands and due to urban effects. The proposed Project would result in a direct loss of vegetation communities identified in Table 2.4-1, and associated special status species impacts to those species occupy impacted vegetation communities. In addition to the permanent loss of these habitats, future development under the proposed Project would result in indirect impacts to sensitive species where such development occurs adjacent to CNF lands or MSCP Preserves. Such indirect effects include, but are not limited to, intensive nighttime lighting, noise, and domestic pets which can adversely affect wildlife species. Such impacts would also be cumulative in nature as they would contribute to the permanent loss of the County's biological resources on a regional level (i.e., through the physical demolition, destruction, relocation, or alteration of these resources and/or immediate surroundings), when combined with other development allowed under the 2011 General Plan.

The proposed Project's direct, indirect and cumulative impacts would be reduced by the same regulations, implementation programs (2011 General Plan goals/policies) and mitigation measures from the General Plan Update PEIR and repeated in Section 2.4.4.1 below. However, implementation of the mitigation measures listed in Section 2.4.4.1 would not reduce these impacts to below a level of significance. While the direct and cumulative impacts within the South County MSCP will be mitigated below a level of significance through implementation of

the Subarea Plan and the Biological Mitigation Ordinance, the North County and East County MSCP Plans are not yet adopted. As such, any contribution to the cumulative loss of habitat supporting special status plant and wildlife species in the draft North and East County Plan areas would be cumulatively considerable, even after mitigation has been implemented for individual projects. It should be noted; however, that an interim North and East County MSCP Planning Agreement (dated October 29, 2008) is in place between the County, the CDFW, and the USFWS. Among other things, this agreement establishes a process to review interim development within the Planning Areas that will help achieve the preliminary conservation objectives and preserve options for establishing a viable reserve system or equivalent long-term conservation measures. This interim planning process requires the County to identify impacts to preserve design and develop mitigation measures and design criteria on a project by project basis to mitigate and allow future preserve design. However, until those MSCP Plans are completed and approved, implementation of the proposed Project could result in significant and unavoidable direct, indirect and cumulative impacts on special status plant and wildlife species.

2.4.3.2 *Riparian Habitat and Other Sensitive Natural Communities*

This section describes direct, indirect, and cumulative impacts to riparian habitat and other sensitive natural communities for the Project areas addressed in this SEIR.

Guidelines for the Determination of Significance

Based on Appendix G of the CEQA Guidelines, the proposed Project would result in a significant impact if it would have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by CDFW or USFWS.

Impact Analysis

The General Plan Update Program EIR evaluated impacts from the adoption of the goals and policies of the 2011 General Plan countywide, including FCI lands. In addition, the 2011 General Plan Update PEIR evaluated buildout of the land use designations applied throughout the unincorporated area with the exception of former FCI lands. The General Plan Update PEIR determined that buildout under the 2011 General Plan would result in potentially significant direct, indirect and cumulative impacts to sensitive vegetation communities (including riparian habitat). The discussion of impacts can be found in Chapter 2.4 Biological Resources, page 2.4-25 of the PEIR and is hereby incorporated by reference. The PEIR found that these impacts would be reduced through the implementation of a combination of federal, State and local regulations; existing County regulatory processes; the adopted 2011 General Plan goals and policies; and, specific mitigation measures/implementation programs identified in the General Plan Update PEIR; however, not to a level of insignificance.

Similar direct, indirect and cumulative effects would occur with future development of the Project areas addressed in this SEIR, which could result in substantial adverse effects on

sensitive vegetation communities (including riparian habitat) from ground disturbing activities (such as grading and excavation) in previously undeveloped lands. Table 2.4-1 identifies and quantifies the vegetation communities that would be directly impacted by future development under the proposed Project. In addition, the locations of these vegetation communities are shown in Figures 2.4-1A and 2.4-1B. It is estimated that approximately 331 acres of habitat may be impacted within South County MSCP Pre-approved Mitigation Area (PAMA) and approximately 2,103 acres of habitat may be impacted within draft North County MSCP PAMA prior to mitigation. The location of South County and draft North County MSCP lands in relation to the Project area is shown on Figures 2.4-2A and 2.4-2B. This SEIR utilizes the following methodology, similar to that used in the General Plan Update PEIR, for estimating the proposed Project's habitat impacts, which is also graphically illustrated in Figures 2.4-2A and 2.4-2B:

1. Some proposed land use designations that promote more extensive development on a property such as large areas of paved parking (e.g., rural commercial, village core mixed use, village residential) would result in greater impacts than lower density land uses (e.g., rural residential) because the latter are not expected to require large expanses of grading and paving.
2. The proposed land use designations for village residential, the higher-density semi-rural residential (SR-1 and SR-2), commercial, village core mixed use, public/semi-public facilities, and recreational open space are estimated to have 100% impact because these land uses would potentially require the removal of all existing vegetation during land development.
3. Lower density semi-rural residential land uses (SR-4 and SR-10) are estimated to have 50% - 75% impact because these uses would consist of larger parcels resulting in the removal of some vegetation while also avoiding other areas of natural habitat onsite.
4. Rural lands (RL-20, RL-40 and RL-80) are estimated to have five acres of impact per potential dwelling unit. A 25% impact is identified for areas assigned a RL-20 designation, a 12.5% impact for areas assigned a RL-40 designation and a 6% impact for areas assigned RL-80, based on a five-acre per dwelling unit assumption for lands outside the MSCP Area. Within PAMA, the potential impact is 2.5 acres per dwelling unit.
5. Tribal lands, National Forests and State Parks, conserved open space, and military would have no impacts because either the County does not have jurisdiction over these areas or the Project does not propose impactful uses for these areas. Existing open space easements or MSCP preserves have also been excluded from the impact totals.

Table 2.4-3 (Level of Impact: MSCP Parcels) identifies, by potential level of impact, the number of parcels and acres within the South County, draft North County and in-process East County MSCP. This table shows that of the 53,919 acres within MSCP PAMA and preserves, only 12,547 acres would have any subdivision potential under the proposed Project. Table 2.4-4 (Level of Impact: Parcels Adjacent to Conserved Lands) identifies the potential level of impact

to parcels adjacent to conserved lands. This table shows that of the 10,264 acres adjacent to conserved lands and preserves, only 2,628 acres would have any subdivision potential under the proposed Project.

In addition to the permanent loss of these habitats, future development under the proposed Project would result in indirect impacts due to the location of the Project areas adjacent to and within CNF lands. In addition, limited development will occur adjacent to MSCP Preserves. Indirect effects resulting from development near CNF and MSCP Preserves include, but are not limited to, edge effects, urban encroachment, invasive plants, fugitive dust, and erosion/siltation and water quality degradation from urban runoff, and habitat fragmentation. Such impacts would also be cumulative in nature as they would contribute to the permanent loss of the County's biological resources on a regional level (i.e., through the physical demolition, destruction, relocation, or alteration of these resources and/or immediate surroundings), when combined with other development allowed under the 2011 General Plan.

The proposed Project's direct, indirect and cumulative impacts would be reduced by the same regulations, implementation programs (2011 General Plan goals/policies) and mitigation measures from the General Plan Update PEIR and repeated in Section 2.4.4.2 below. However, implementation of the mitigation measures listed in Section 2.4.4.1 would not reduce these impacts to below a level of significance. While the direct and cumulative impacts within the South County MSCP will be mitigated below a level of significance through implementation of the Subarea Plan and the Biological Mitigation Ordinance, the North County and East County MSCP Plans are not yet adopted. As such, any contribution to the cumulative loss of habitat supporting special status plant and wildlife species in the draft North and East County Plan areas would be cumulatively considerable, even after mitigation has been implemented for individual projects. It should be noted; however, that an interim North and East County MSCP Planning Agreement (dated October 29, 2008) is in place between the County, the CDFW, and the USFWS. Among other things, this agreement establishes a process to review interim development within the Planning Areas that will help achieve the preliminary conservation objectives and preserve options for establishing a viable reserve system or equivalent long-term conservation measures. But until those MSCP Plans are completed and approved, implementation of the proposed Project would result in significant and unavoidable direct, indirect and cumulative impacts on sensitive vegetation communities (including riparian habitat).

2.4.3.3 *Federally Protected Wetlands*

This section describes the direct, indirect and cumulative impacts to federally protected wetlands for the Project areas addressed in this SEIR.

Guidelines for the Determination of Significance

Based on Appendix G of the CEQA Guidelines, the proposed Project would result in a significant impact if it would have a substantial adverse effect on federally protected wetlands as

defined by Section 404 of the Clean Water Act through direct removal, filling, hydrological interruption, or other means.

Impact Analysis

The General Plan Update PEIR evaluated impacts from the adoption of the goals and policies of the 2011 General Plan countywide, including FCI lands. In addition, the General Plan Update PEIR evaluated buildout of the land use designations applied throughout the unincorporated area with the exception of former FCI lands. The General Plan Update PEIR determined that buildout under the 2011 General Plan would result in potentially significant direct and indirect impacts and less than significant cumulative impacts to federally protected wetlands. The discussion of impacts can be found in Chapter 2.4 Biological Resources, page 2.4-27 and is hereby incorporated by reference. The PEIR found these direct and indirect impacts would be reduced to below a level of significance through the implementation of a combination of federal, State and local regulations; existing County regulatory processes; the adopted 2011 General Plan goals and policies; and, specific mitigation measures/implementation programs identified in the General Plan Update PEIR.

Similar direct and indirect effects would occur with future development of the Project areas addressed in this SEIR, which could result in substantial adverse effects on wetlands (i.e., removal, filling, hydrological interruption, or other disturbances) from ground disturbing activities (such as grading and excavation) in previously undeveloped lands. The Project area includes approximately 2,090 acres of wetlands with the majority of the wetland acreage located in Central Mountain, North Mountain, and Alpine Project areas. Refer to Table 2.4-2 for wetland acreage within the Project area by community. Consistent with the approach taken in the General Plan Update PEIR, this acreage is conservative in that it is inclusive of, but not limited to federally protected wetlands. The location of wetlands in relation to the Project area is shown on Figures 2.4-3A and 2.4-3B. The potentially significant direct and indirect effects would be reduced to below a level of significance by the same regulations, implementation programs (2011 General Plan goals/policies) and mitigation measures/implementation programs from the General Plan Update PEIR and repeated in Section 2.4.4.3 below. In addition, as existing regulations would ensure that cumulative projects would meet the no-net-loss standard, the proposed Project would not contribute to significant cumulative impacts to federally protected wetlands, and no additional mitigation measures would be required.

2.4.3.4 *Wildlife Movement Corridors and Nursery Sites*

This section describes direct, indirect and cumulative impacts to wildlife movement corridors and nursery sites for the Project areas addressed in this SEIR.

Guidelines for the Determination of Significance

Based on Appendix G of the CEQA Guidelines, the proposed Project would result in a significant impact if it would interfere substantially with the movement of any native resident or

migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Impact Analysis

The General Plan Update PEIR evaluated impacts from the adoption of the goals and policies of the 2011 General Plan countywide, including FCI lands. In addition, the PEIR evaluated buildout of the land use designations applied throughout the unincorporated area with the exception of former FCI lands. The General Plan Update PEIR determined that buildout under the 2011 General Plan would result in potentially significant direct, indirect, and cumulative impacts to wildlife movement corridors and nursery sites. The discussion of impacts can be found in Chapter 2.4 Biological Resources, page 2.4-28 of the PEIR and is hereby incorporated by reference. These impacts would be reduced through the implementation of a combination of federal, State and local regulations; existing County regulatory processes; the adopted 2011 General Plan goals and policies; and, specific mitigation measures/implementation programs identified in the General Plan Update PEIR; however not to a level of insignificance.

Similar direct, indirect and cumulative effects would occur with future development of the Project areas addressed in this SEIR, which could result in substantial adverse effects on wildlife corridors and nursery sites from ground disturbing activities (such as grading and excavation) in previously undeveloped lands. In addition to the permanent loss of habitats that could result in direct impacts to wildlife corridors, future development under the proposed Project would result in indirect impacts where such development occurs adjacent to CNF lands or MSCP Preserves. Such indirect effects include, but are not limited to, intensive nighttime lighting, noise, and domestic pets which can adversely affect wildlife species movements. Such impacts would also be cumulative in nature as they would contribute to the permanent loss of the County's wildlife corridors and nursery sites on a regional level (i.e., through the physical demolition, destruction, relocation, or alteration of these resources and/or immediate surroundings), when combined with other development allowed under the 2011 General Plan.

The proposed Project's direct, indirect and cumulative impacts would be reduced by the same regulations, implementation programs (2011 General Plan goals/policies) and mitigation measures from the General Plan Update PEIR and repeated in Section 2.4.4.4 below. However, implementation of the mitigation measures listed in Section 2.4.4.4 would not reduce these impacts to below a level of significance. Implementation of the MSCP, County of San Diego ~~While the direct and cumulative impacts within the South County MSCP will be mitigated below a level of significance through implementation of the~~ Subarea Plan and the Biological Mitigation Ordinance will provide for mitigation of the direct and cumulative impacts within the Subarea Plan area (southwestern portion of the county). For the northwestern and eastern portions of the county, the North County and East County MSCP Plans have are not yet adopted. As such, any contribution to the cumulative loss of wildlife corridors in the draft North and East County Plan areas would be cumulatively considerable, even after mitigation has been implemented for individual projects. It should be noted; however, that an interim North and East County MSCP

Planning Agreement (dated ~~October 29, 2008~~~~May 16, 2014~~) is in place between the County, the CDFW, and the USFWS. Among other things, this agreement establishes a process to review interim development within the Planning Areas that will help achieve the preliminary conservation objectives and preserve options for establishing a viable reserve system or equivalent long-term conservation measures, but until those MSCP Plans are completed and approved, the proposed Project would result in significant and unavoidable direct, indirect and cumulative impacts on wildlife corridors and nursery sites.

2.4.3.5 Local Policies and Ordinances

This section describes the direct and cumulative impacts associated with compliance with local policies and ordinances for the Project areas addressed in this SEIR.

Guidelines for the Determination of Significance

Based on Appendix G of the CEQA Guidelines, the proposed Project would result in a significant impact if it would conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

Impact Analysis

The General Plan Update PEIR evaluated impacts from the adoption of the goals and policies of the 2011 General Plan countywide, including FCI lands. In addition, the General Plan Update PEIR evaluated buildout of the land use designations applied throughout the unincorporated area with the exception of former FCI lands. The General Plan Update PEIR determined that buildout under the 2011 General Plan would result in less than significant direct and cumulative impacts related to compliance with local policies and ordinances protecting biological resources. These impacts were determined to be less than significant based on the implementation of existing regulations, policies, plans and guidelines. For these same reasons, the proposed Project would not result in significant direct and cumulative impacts associated with consistency with local policies and ordinances protecting biological resources.

2.4.3.6 Habitat Conservation Plans and NCCPs

This section describes the direct and cumulative impacts associated with compliance with adopted habitat conservation plans (HCPs) and Natural Community Conservation Planning (NCCP) for the Project areas addressed in this SEIR.

Guidelines for the Determination of Significance

Based on Appendix G of the CEQA Guidelines, the proposed Project would result in a significant impact if it would conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or State habitat conservation plan.

Impact Analysis

The General Plan Update PEIR evaluated impacts from the adoption of the goals and policies of the 2011 General Plan countywide, including FCI lands. In addition, the General Plan Update PEIR evaluated buildout of the land use designations applied throughout the unincorporated area with the exception of former FCI lands. The General Plan Update PEIR determined that buildout under the 2011 General Plan would result in less than significant direct and cumulative impacts related to compliance with an approved local, regional, or State adopted HCP or NCCP. These impacts were determined to be less than significant based on the implementation of existing regulations, policies, plans and guidelines. For these same reasons, the proposed Project would not result in significant direct and cumulative impacts associated with consistency with an approved local, regional, or State adopted HCP or NCCP.

2.4.4 Mitigation

2.4.4.1 *Special Status Plant and Wildlife Species*

Direct, indirect and cumulative impacts associated with special status species resulting from the proposed Project would be minimized with implementation of the 2011 General Plan policies and feasible mitigation measures identified in the General Plan Update PEIR, and repeated below; however, the County determined that implementation of the measure listed below would be infeasible for the following reasons:

- Adopt MSCP Plans for North County and East County that provide coverage for special status species as well as protections for wildlife corridors, habitat linkages, and core habitat areas in those regions. This measure is feasible and attainable as the County is currently in the process of preparing such plans. However, these conservation plans require approval at the federal and State levels, which the County cannot guarantee ahead of time. In addition, the timing of these programs (i.e., MSCP adoption and implementation) may not coincide with the proposed Project impacts in these areas. Therefore, this measure cannot be considered feasible mitigation for the proposed Project.

The measure listed above related to adopting MSCP Plans for North and East County was found to be infeasible by the County, to mitigate impacts to special status species due to uncertain timing and the necessity for the plans to be adopted by agencies other than the County; therefore, implementation cannot be assured, and impacts would still remain significant and unavoidable.

2011 General Plan Policies

Policy COS-1.3: Management. Monitor, manage and maintain the regional preserve system facilitating the survival of native species and the preservation of healthy populations of rare, threatened, or endangered species.

Policy COS-1.6: Assemblage of Preserve Systems. Support the proactive assemblage of a biological preserve system to protect biological resources and to facilitate development through mitigation banking opportunities.

Policy COS-1.7: Preserve System Funding. Provide adequate funding for assemblage, management, maintenance, and monitoring through coordination with other jurisdictions and agencies.

Policy COS-1.8: Preserve Assemblage. Support the acquisition of large tracts of land that have multiple resource preservation benefits, such as biology, hydrology, cultural, aesthetics, and community character. Establish funding mechanisms to serve as an alternative when mitigation requirements would not result in the acquisition of large tracts of land.

Policy COS-1.9: Invasive Species. Require new development adjacent to biological preserves to use non-invasive plants in landscaping. Encourage the removal of invasive plants within preserves.

Policy COS-1.10: Public Involvement. Ensure an open, transparent, and inclusive decision-making process by involving the public throughout the course of planning and implementation of habitat conservation plans and resource management plans.

Policy COS-1.11: Volunteer Preserve Monitor. Encourage the formation of volunteer preserve managers that are incorporated into each community planning group to supplement professional enforcement staff.

Policy COS-2.1: Protection, Restoration and Enhancement. Protect and enhance natural wildlife habitat outside of preserves as development occurs according to the underlying land use designation. Limit the degradation of regionally important natural habitats within the Semi-Rural and Rural Lands regional categories, as well as within Village lands where appropriate.

Policy COS-2.2: Habitat Protection through Site Design. Require development to be sited in the least biologically sensitive areas and minimize the loss of natural habitat through site design.

Policy LU-6.1: Environmental Sustainability. Require the protection of intact or sensitive natural resources in support of the long-term sustainability of the natural environment.

Policy LU-6.2: Reducing Development Pressures. Assign lowest-density or lowest-intensity land use designations to areas with sensitive natural resources.

Policy LU-6.3: Conservation-Oriented Project Design. Support conservation-oriented project design. This can be achieved with mechanisms such as, but not limited to, Specific Plans, lot area averaging, and reductions in lot size with corresponding requirements for preserved open space (Planned Residential Developments). Projects that rely on lot size reductions should incorporate specific design techniques, perimeter lot sizes, or buffers, to achieve compatibility with community character. [See applicable community plan for possible relevant policies.]

Policy LU-6.4: Sustainable Subdivision Design. Require that residential subdivisions be planned to conserve open space and natural resources, protect agricultural operations including grazing, increase fire safety and defensibility, reduce impervious footprints, use sustainable development practices, and, when appropriate, provide public amenities. [See applicable community plan for possible relevant policies.]

Policy LU-6.6: Integration of Natural Features into Project Design. Require incorporation of natural features (including mature oaks, indigenous trees, and rock formations) into proposed development and require avoidance of sensitive environmental resources.

Policy LU-6.7: Open Space Network. Require projects with open space to design contiguous open space areas that protect wildlife habitat and corridors; preserve scenic vistas and areas; and connect with existing or planned recreational opportunities.

Policy LU-10.2: Development-Environmental Resource Relationship. Require development in Semi-Rural and Rural areas to respect and conserve the unique natural features and rural character, and avoid sensitive or intact environmental resources and hazard areas.

These policies require monitoring, management and maintenance of a regional preserve system. These actions would facilitate preserve assembly and funding, help minimize edge effects, facilitate preparation of habitat conservation plans and resource management plans, direct development to avoid and/or preserve habitat, provide for long-term sustainability of the natural environment, and encourage contiguous open space areas that protect wildlife habitat and corridors. Adherence to these policies will further reduce impacts to special status species from future development.

Mitigation Measures

Bio-1.1 Create a Conservation Subdivision Program that facilitates conservation-oriented project design through changes to the Subdivision Ordinance, Resource Protection Ordinance (RPO), Zoning Ordinance, Groundwater Ordinance, and other regulations as necessary. It is intended that these changes will promote conservation of natural resources and open space while improving mechanisms for flexibility in project design so that production of housing stock is not negatively impacted. Additionally, any such allowances of flexibility must be done with consideration of community character through planning group coordination and/or findings required for project approval.

Bio-1.2 Implement and revise existing HCP policies to preserve sensitive resources within a cohesive system of open space. In addition, continue preparation of MSCP Plans for North County and East County.

Bio-1.3 Implement conservation agreements through Board Policy I-123, as this will facilitate preservation of high-value habitat in the County's MSCP Subarea Plan.

Bio-1.4 Coordinate with nonprofit groups and other agencies to acquire preserve lands.

- Bio-1.5** Utilize “County Guidelines for Determining Significance for Biological Resources” to identify adverse impacts to biological resources. Also utilize the County’s Geographic Information System (GIS) records and the Comprehensive Matrix of Sensitive Species to locate special status species populations on or near project sites. This information will be used to avoid or mitigate impacts as appropriate.
- Bio-1.6** Implement the RPO, Biological Mitigation Ordinance (BMO), and Habitat Loss Permit (HLP) Ordinance to protect wetlands, wetland buffers, sensitive habitat lands, biological resource core areas, linkages, corridors, high-value habitat areas, subregional coastal sage scrub focus areas, and populations of rare, or endangered plant or animal species.
- Bio-1.7** Minimize edge effects from development projects located near sensitive resources by implementing the County Noise Ordinance, the County Groundwater Ordinance, the County’s Landscaping Regulations (currently part of the Zoning Ordinance), and the County Watershed Protection, Storm Water Management, and Discharge Control Ordinance.

Bio-1.1 will promote conservation of natural resources and open space while improving mechanisms for flexibility in project design so that production of housing stock is not negatively impacted. Bio-1.2 will ensure that success is continued and carried forward to future MSCP efforts. Bio-1.3 will benefit sensitive species by preserving sizeable areas of habitat in the unincorporated County. Bio-1.4 will help continue the County’s success with acquiring large areas of open space that are utilized by resident and migratory special status species and other sensitive natural communities throughout the region. Bio-1.5 directs the County to utilize County Guidelines for Determining Significance for Biological Resources and GIS records to gather information that will be used to avoid or mitigate potential project impacts as appropriate. Ordinances listed in Bio-1.6 are part of the County regulatory code and explicitly mandate preservation of sensitive biological resources. Implementation of ordinances listed in Bio-1.7 reduces potential indirect impacts to special status species and their habitats.

2.4.4.2 *Riparian Habitat and Other Sensitive Natural Communities*

Direct, indirect and cumulative impacts associated with sensitive vegetation communities (including riparian habitats) resulting from the proposed Project would be minimized with implementation of 2011 General Plan policies and mitigation measures identified in the General Plan Update PEIR, and repeated below. However, consistent with the General Plan Update PEIR, impacts would not be reduced to below a level of significance. The measures that were found to be infeasible related to adopting MSCP Plans for North and East County are still found infeasible for the same reasons detailed in the General Plan Update PEIR. Therefore, while the proposed Project impacts would be minimized by the implementation of the 2011 General Plan

policies and mitigation measures listed below, impacts would still remain significant and unavoidable.

2011 General Plan Policies

In addition to the policies listed in Section 2.4.4.1 above, the following policy would further reduce impacts associated with sensitive vegetation communities (including riparian habitats), although not to below a level of significance for the reasons stated above.

Policy COS-3.1: Wetland Protection. Require development to preserve existing natural wetland areas and associated transitional riparian and upland buffers and retain opportunities for enhancement.

These policies require monitoring, management and maintenance of a regional preserve system. These actions would facilitate preserve assembly and funding, help minimize edge effects, facilitate preparation of habitat conservation plans and resource management plans, direct development to avoid and/or preserve habitat, provide for long-term sustainability of the natural environment, and encourage contiguous open space areas that protect wildlife habitat and corridors. Adherence to these policies will further reduce impacts to riparian habitat and other sensitive natural communities from future development.

Mitigation Measures

In addition to Mitigation Measures Bio-1.1 through Bio-1.7 listed above, implementation of the following mitigation measures would further reduce the proposed Project impacts associated with special status species, although not to below a level of significance for the reasons stated above.

- Bio-2.1** Revise the Ordinance Relating to Water Conservation for Landscaping to incorporate appropriate plant types and regulations requiring planting of native or compatible non-native, non-invasive plant species in new development.
- Bio-2.2** Require that development projects obtain CWA Section 401/404 permits issued by the California Regional Water Quality Control Board and U.S. Army Corps of Engineers for all project-related disturbances of waters of the U.S. and/or associated wetlands. Also continue to require that projects obtain California Fish and Wildlife Code Section 1602 Streambed Alteration Agreements from the California Department of Fish and Wildlife for all project-related disturbances of streambeds.
- Bio-2.3** Ensure that wetlands and wetland buffer areas are adequately preserved whenever feasible to maintain biological functions and values.
- Bio-2.4** Implement the Watershed Protection, Storm Water Management, and Discharge Control Ordinance to protect wetlands.

Bio-1.1 will promote conservation of natural resources and open space while improving mechanisms for flexibility in project design so that production of housing stock is not negatively impacted. Bio-1.2 will ensure that this success is continued and carried forward to future MSCP efforts. Bio-1.3 will preserve riparian habitat and other sensitive natural communities by preserving sizeable areas of habitat in the unincorporated County. Bio-1.4 will help continue the County's success with acquiring large areas of open space that contain riparian habitat and other sensitive natural communities throughout the region. Bio-1.5 directs the County to utilize County Guidelines for Determining Significance for Biological Resources and GIS records to gather information that will be used to avoid or mitigate potential project impacts as appropriate. Ordinances listed in Bio-1.6 are part of the County regulatory code and explicitly mandate preservation of sensitive biological resources. Implementation of ordinances listed in Bio-1.7 reduces potential indirect impacts to special status species and their habitats, as well as riparian habitat and other sensitive natural communities.

Bio-2.1 will prevent indirect impacts to riparian habitat and other sensitive natural communities associated with invasive plant species. By identifying the need for permits as listed in Bio-2.2, the County can ensure that applicable mitigating measures required or requested by these agencies can be included for such projects. Bio-2.3 ensures that the same level of protection for wetlands and wetland buffers is applied whenever feasible. Bio-2.4 requires implementation of the identified provisions to development projects to reduce potential indirect impacts to riparian habitat and other sensitive natural communities from stormwater runoff.

2.4.4.3 *Federally Protected Wetlands*

Direct, indirect and cumulative impacts to federally protected wetlands associated with the proposed Project would be reduced to below a level of significance with implementation of the same applicable 2011 General Plan policies and mitigation measures as identified in the General Plan Update PEIR, and repeated below. Figures 2.4-3A and 2.4-3B identify the location of mapped wetlands in relation to the Project areas.

2011 General Plan Policies

In addition to Policy COS-3.1 listed in Section 2.4.4.2 above, the following policy would further reduce the proposed Project impacts to federally protected wetlands to below a level of significance.

Policy COS-3.2: Minimize Impacts of Development. Require development projects to:

- Mitigate any unavoidable losses of wetlands, including its habitat functions and values; and
- Protect wetlands, including vernal pools, from a variety of discharges and activities, such as dredging or adding fill material, exposure to pollutants such as nutrients, hydromodification, land and vegetation clearing, and the introduction of invasive species.

Mitigation Measures

Implementation of Mitigation Measures Bio-1.1, Bio-1.5, Bio-1.6, Bio-1.7, Bio-2.2, Bio-2.3, and Bio-2.4 listed above would reduce the proposed Project impacts to federally protected wetlands to below a level of significance.

Bio-1.1 will prevent direct impacts to federally protected wetlands located on subdivision sites. Bio-1.5 requires application of the County Guidelines for Determining Significance for Biological Resources during project review to avoid or mitigate potential impacts to sensitive biological resources, including federally protected wetlands. Bio-1.6 requires application of County ordinances to projects for the purpose of protecting important biological resources. Under County ordinances and regulations, impacts to federally protected wetlands are either avoided or mitigated to the standard of no-net-loss to wetlands. Bio-1.7 requires application of other County ordinances to further minimize or avoid impacts to federally protected wetlands.

The permitting processes as identified in Bio-2.2 require impacts to be mitigated to the satisfaction of the state or federal agencies. Bio-2.3 requires that wetlands and wetland buffer areas be adequately preserved whenever feasible to maintain biological functions and values, which will minimize impacts to federally protected wetlands. Bio-2.4 requires implementation of the Watershed Protection, Storm Water Management, and Discharge Control Ordinance to protect wetlands. By reducing polluted runoff and improving the water quality of receiving waters, this ordinance shall further minimize potential impacts to federally protected wetlands.

2.4.4.4 *Wildlife Movement Corridors and Nursery Sites*

Direct, indirect and cumulative impacts associated with wildlife movement corridors and nursery sites resulting from the proposed Project would be minimized with implementation of 2011 General Plan policies and mitigation measures identified in the General Plan Update PEIR, and repeated below. However, consistent with the General Plan Update PEIR, impacts would not be reduced to below a level of significance. The measures that were found to be infeasible related to adopting MSCP Plans for North and East County are still found infeasible for the same reasons detailed in the General Plan Update PEIR. Therefore, while the proposed Project impacts would be minimized by the implementation of the 2011 General Plan policies and mitigation measures listed below, impacts would still remain significant and unavoidable.

2011 General Plan Policies

In addition to Policies COS-1.3, LU-6.1, and LU-6.7 listed in Section 2.6.4.1 above, the following policies would further reduce impacts associated with wildlife movement corridors and nursery sites, although not to below a level of significance for the reasons stated above.

Policy COS-1.1: Coordinated Preserve System. Identify and develop a coordinated biological preserve system that includes Pre Approved Mitigation Areas, Biological Resource

Core Areas, wildlife corridors, and linkages to allow wildlife to travel throughout their habitat ranges.

Policy COS-1.2: Minimize Impacts. Prohibit private development within established preserves. Minimize impacts within established preserves when the construction of public infrastructure is unavoidable.

Policy COS-1.4: Collaboration with Other Jurisdictions. Collaborate with other jurisdictions and trustee agencies to achieve well-defined common resource preservation and management goals.

Policy COS-1.5: Regional Funding. Collaborate with other jurisdictions and federal, state, and local agencies to identify regional, long-term funding mechanisms that achieve common resource management goals.

These policies allow creation, protection, maintenance and management of a coordinated biological preserve system that includes Biological Resource Core Areas, wildlife corridors, and linkages to allow wildlife to travel throughout their habitat ranges. Policy COS-1.2 prohibits private development within established preserves. Adherence to these policies will further reduce impacts to wildlife movement corridors and nursery sites from future development.

Mitigation Measures

Implementation of Mitigation Measures Bio-1.1 through Bio-1.7 and Bio-2.3 listed above would reduce impacts to wildlife corridors and nursery sites, although not to below a level of significance for the reasons stated above.

Bio-1.1 will promote conservation of natural resources and open space while improving mechanisms for flexibility in project design so that production of housing stock is not negatively impacted. Bio-1.2 will ensure that this success is continued and carried forward to future MSCP efforts. Bio-1.3 will preserve wildlife movement corridors and nursery sites in the unincorporated County. Bio-1.4 will help continue the County's success with acquiring large areas of open space that contain wildlife movement corridors and nursery sites throughout the region. Bio-1.5 directs the County to utilize County Guidelines for Determining Significance for Biological Resources and GIS records to gather information that will be used to avoid or mitigate potential project impacts as appropriate. Ordinances listed in Bio-1.6 are part of the County regulatory code and explicitly mandate preservation of sensitive biological resources. Implementation of ordinances listed in Bio-1.7 reduces potential indirect impacts to wildlife movement corridors and nursery sites. Bio-2.3 requires that wetlands and wetland buffer areas be adequately preserved whenever feasible to maintain biological functions and values, which will minimize impacts to federally protected wetlands.

2.4.4.5 Local Policies and Ordinances

For the same reasons discussed in Chapter 2.4 of the General Plan Update PEIR on page 2.4-36, and because the proposed Project would be consistent with County of San Diego policies and

ordinances, the proposed Project would not result in significant impacts associated with consistency with local policies and ordinances protecting biological resources; therefore, no mitigation measures would be required. However, the following 2011 General Plan Policies are applicable to this issue: COS-1.2, COS-1.3 and COS-1.9.

2.4.4.6 *Habitat Conservation Plans and NCCPs*

For the same reasons discussed in Chapter 2.4 of the General Plan Update PEIR on page 2.4-37, and because the proposed Project would be consistent with County of San Diego policies and ordinances, the project would not result in significant direct and cumulative impacts associated with consistency with an approved local, regional, or State adopted HCP or NCCP; therefore, no mitigation measures would be required. However, the following 2011 General Plan Policies are applicable to this issue: COS-1.2, COS-1.3, and COS-1.6 through COS-1.10.

SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE PROPOSED PROJECT

Table 2.4-1 Habitat Impacts by Vegetation Community

Vegetation Categories	Impacted Acres	Total Acres
Forest	2,001	<u>14,221</u>
81100 Mixed Evergreen Forest	507	<u>4,319</u>
81300 Oak Forest	1	<u>24</u>
81310 Coast Live Oak Forest	12	<u>151</u>
81320 Canyon Live Oak Forest	1	<u>10</u>
81340 Black Oak Forest	117	<u>311</u>
84140 Coulter Pine Forest	13	<u>206</u>
84150 Bigcone Spruce (Bigcone Douglas Fir)-Canyon Oak Forest	265	<u>1,720</u>
84230 Sierran Mixed Coniferous Forest	402	<u>2,016</u>
84500 Mixed Oak/Coniferous/Bigcone/Coulter	470	<u>4,138</u>
85100 Jeffrey Pine Forest	213	<u>1,326</u>
Grasslands, Vernal Pools, Meadows, and Other Herb Communities	797	<u>6,254</u>
42000 Valley and Foothill Grassland	87	<u>758</u>
42100 Native Grassland	20	<u>27</u>
42110 Valley Needlegrass Grassland	3	<u>35</u>
42120 Valley Sacaton Grassland	97	<u>289</u>
42200 Non-Native Grassland	98	<u>608</u>
42300 Wildflower Field	1	<u>8</u>
42400 Foothill/Mountain Perennial Grassland	258	<u>2,644</u>
45100 Montane Meadow	6	<u>75</u>
45110 Wet Montane Meadow	92	<u>1,082</u>
45400 Freshwater Seep	54	<u>476</u>
52400 Freshwater Marsh	0	<u>2</u>
18310 Field/Pasture	81	<u>250</u>
Riparian and Bottomland Habitat	458	<u>1,770</u>
13140 Freshwater	49	<u>228</u>
13200 Non-Vegetated Channel, Floodway, Lakeshore Fringe	7	<u>26</u>
61300 Southern Riparian Forest	14	<u>111</u>
61310 Southern Coast Live Oak Riparian Forest	213	<u>784</u>
61330 Southern Cottonwood-willow Riparian Forest	29	<u>207</u>
61510 White Alder Riparian Forest	7	<u>53</u>
62000 Riparian Woodlands	9	<u>31</u>
62400 Southern Sycamore-alder Riparian Woodland	2	<u>22</u>
63300 Southern Riparian Scrub	128	<u>309</u>
Scrub and Chaparral	6,800	<u>32,146</u>
32500 Diegan Coastal Sage Scrub	279	<u>2,610</u>
35200 Sagebrush Scrub	52	<u>447</u>
35210 Big Sagebrush Scrub	32	<u>39</u>
35210 Sagebrush Scrub	52	<u>447</u>
37000 Chaparral	122	<u>757</u>
37120 Southern Mixed Chaparral	1,182	<u>2,768</u>

SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE PROPOSED PROJECT

TABLE 4.2-1 (CONTINUED)

Vegetation Categories	Impacted Acres	Total Acres
37121 Granitic Southern Mixed Chaparral	1,487	<u>4,330</u>
37122 Mafic Southern Mixed Chaparral	39	<u>120</u>
37130 Northern Mixed Chaparral	766	<u>4,622</u>
37131 Granitic Northern Mixed Chaparral	1,075	<u>7,607</u>
37132 Mafic Northern Mixed Chaparral	77	<u>945</u>
37200 Chamise Chaparral	721	<u>2,613</u>
37210 Granitic Chamise Chaparral	355	<u>1,677</u>
37220 Mafic Chamise Chaparral	16	<u>27</u>
37300 Red Shank Chaparral	83	<u>663</u>
37400 Semi-Desert Chaparral	4	<u>34</u>
37500 Montane Chaparral	15	<u>156</u>
37520 Montane Manzanita Chaparral	5	<u>34</u>
37530 Montane Ceanothus Chaparral	2	<u>27</u>
37540 Montane Scrub Oak Chaparral	14	<u>80</u>
37900 Scrub Oak Chaparral	85	<u>933</u>
37A00 Interior Live Oak Chaparral	3	<u>40</u>
37G00 Coastal Sage-Chaparral Scrub	230	<u>867</u>
37K00 Montane Buckwheat	104	<u>302</u>
Woodland	2,472	<u>14,731</u>
62000 Riparian Woodlands	9	<u>31</u>
62400 Southern Sycamore-alder Riparian Woodland	2	<u>22</u>
63300 Southern Riparian Scrub	128	<u>309</u>
63310 Mule Fat Scrub	0	<u>0</u>
63320 Southern Willow Scrub	11	<u>60</u>
70000 Woodland	2	<u>13</u>
71100 Oak Woodland	0	<u>5</u>
71120 Black Oak Woodland	133	<u>1,346</u>
71160 Coast Live Oak Woodland	12	<u>163</u>
71161 Open Coast Live Oak Woodland	72	<u>447</u>
71162 Dense Coast Live Oak Woodland	902	<u>4,788</u>
71180 Engelmann Oak Woodland	0	<u>0</u>
71181 Open Engelmann Oak Woodland	535	<u>2,889</u>
71182 Dense Engelmann Oak Woodland	154	<u>1,491</u>
77000 Mixed Oak Woodland	490	<u>2,963</u>
78000 Undifferentiated Open Woodland	16	<u>154</u>
79000 Non-Native Woodland	4	<u>37</u>
79100 Eucalyptus Woodland	2	<u>13</u>
Total Vegetation Impact	12,528	<u>69,122</u>

Source: LUEG GIS 2014a

SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE PROPOSED PROJECT

TABLE 2.4-2 WETLAND ACRES WITHIN THE PROJECT AREA BY COMMUNITY PLANNING AREA

Community	Wetland Acres in FCI
Alpine	372.4
Central Mountain	740.3
Cuyamaca	66.6
Descanso	190.4
Pine Valley	353.7
Unrepresented	129.5
Desert	15.4
Jamul-Dulzura	63.8
Julian	243.5
Mountain Empire	85.0
Lake Morena / Campo	70.1
Unrepresented	14.9
North Mountain	529.4
Palomar Mountain	349.4
Unrepresented	180.1
Pendleton-DeLuz	27.5
Ramona	12.8
Grand Total	2,090.1

Source: LUEG GIS 2014b

SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE PROPOSED PROJECT

TABLE 2.4-3 LEVEL OF IMPACT: MSCP PARCELS

Level of Impact	Number of Parcels				Acreage			
	SCMSCP	Draft NCMSCP	In-process ECMSCP	Total	SCMSCP	Draft NCMSCP	In-process ECMSCP	Total
<i>No Subdivision Potential</i>								
<u>0.0%</u>	=	<u>1</u>	<u>3</u>	<u>4</u>	=	<u>16.6</u>	<u>97.4</u>	<u>114.1</u>
<u>6.3%</u>	=	<u>24</u>	<u>362</u>	<u>386</u>	=	<u>1,289.2</u>	<u>18,014.3</u>	<u>19,303.5</u>
<u>12.5%</u>	<u>22</u>	<u>5</u>	<u>609</u>	<u>636</u>	<u>305.7</u>	<u>14.7</u>	<u>16,287.2</u>	<u>16,607.6</u>
<u>25.0%</u>	=	=	<u>128</u>	<u>128</u>	=	=	<u>2,114.7</u>	<u>2,114.7</u>
<u>50.0%</u>	=	<u>2</u>	<u>182</u>	<u>184</u>	=	<u>19.9</u>	<u>1,663.7</u>	<u>1,683.6</u>
<u>75.0%</u>	<u>5</u>	<u>4</u>	<u>209</u>	<u>218</u>	<u>109.9</u>	<u>10.3</u>	<u>550.1</u>	<u>670.2</u>
<u>100.0%</u>	=	<u>2</u>	<u>73</u>	<u>75</u>	=	<u>92.0</u>	<u>786.4</u>	<u>878.4</u>
TOTAL	<u>27</u>	<u>38</u>	<u>1,566</u>	<u>1,631</u>	<u>415.6</u>	<u>1,442.6</u>	<u>39,513.8</u>	<u>41,372.1</u>
<i>Additional Subdivision Potential</i>								
<u>6.3%</u>	=	<u>4</u>	<u>31</u>	<u>35</u>	=	<u>549.9</u>	<u>6,647.3</u>	<u>7,197.2</u>
<u>12.5%</u>	=	<u>4</u>	<u>24</u>	<u>28</u>	=	<u>326.6</u>	<u>4,186.9</u>	<u>4,513.5</u>
<u>25.0%</u>	=	=	<u>4</u>	<u>4</u>	=	=	<u>835.9</u>	<u>835.9</u>
TOTAL	<u>0</u>	<u>8</u>	<u>59</u>	<u>67</u>	<u>0.0</u>	<u>876.5</u>	<u>11,670.1</u>	<u>12,546.6</u>

Source: LUEG GIS 2016

TABLE 2.4-4 LEVEL OF IMPACT: PARCELS ADJACENT TO CONSERVED LANDS

Level of Impact	Parcels	Acreage
<i>No Subdivision Potential</i>		
<u>0.0%</u>	<u>35</u>	<u>1,163</u>
<u>6.3%</u>	<u>109</u>	<u>3,338</u>
<u>12.5%</u>	<u>59</u>	<u>1,688</u>
<u>25.0%</u>	<u>76</u>	<u>404</u>
<u>50.0%</u>	<u>87</u>	<u>757</u>
<u>75.0%</u>	<u>71</u>	<u>136</u>
<u>100.0%</u>	<u>51</u>	<u>150</u>
TOTAL	<u>488</u>	<u>7,636</u>
<i>Additional Subdivision Potential</i>		
<u>6.3%</u>	<u>5</u>	<u>1,113</u>
<u>12.5%</u>	<u>8</u>	<u>1,217</u>
<u>50.0%</u>	<u>5</u>	<u>21</u>
<u>75.0%</u>	<u>4</u>	<u>152</u>
<u>100.0%</u>	<u>13</u>	<u>125</u>
TOTAL	<u>35</u>	<u>2,628</u>

Source: LUEG GIS 2016