

2.4 **Biological Resources**

This section evaluates the existing biological resources within the PSR Analysis Areas and the former CGSP Areas, and analyzes the potential effects of the Proposed Project on these conditions. Biological resources considered in this section include vegetation communities, special status plants and wildlife, sensitive natural communities, federally protected wetlands, wildlife corridors, and local policies/ordinance and habitat conservation plans. Information contained in this section has been incorporated from the County of San Diego Guidelines for Determining Significance Biological Resources (DPLU 2010a) and the County of San Diego General Plan Conservation and Open Space Element (County 2011a).

A summary of the biological resources impacts identified in Section 2.4.3 is provided below.

Biological Resources Summary of Impacts

Issue Topic	Project Direct Impact	Cumulative Impact	Impact After Mitigation
Special Status Plant and Wildlife Species	Potentially significant	Potentially significant	Significant and unavoidable
Riparian Habitat and Other Sensitive Natural Communities	Potentially significant	Potentially significant	Significant and unavoidable
Federally Protected Wetlands	Potentially significant	Less than significant	Less than significant
Wildlife Movement Corridors and Nursery Sites	Potentially significant	Potentially significant	Significant and unavoidable
Local Policies and Ordinances	Less than significant	Less than significant	Less than significant
Habitat Conservation Plans and Natural Community Conservation Plan	Less than significant	Less than significant	Less than significant

2.4.1 **Existing Conditions**

Section 2.4.1 of the 2011 PEIR included a discussion of existing conditions related to biological resources in the unincorporated County. The biological resource conditions described in the 2011 PEIR are the same as the existing conditions evaluated in this SEIR with the exception of a number of plant and animal species whose status has changed since 2011. These plant and animal species are described below. It should be noted that the County MSCP is expanding to the North and East portions of the county. The North County Plan is currently in the draft stage, and the East County Plan is in the development stage. All references used in the 2011 PEIR were reviewed to ensure they are still valid today, and are hereby incorporated by reference.

Special Status Species Identified Since 2011 PEIR

Since the adoption of the 2011 PEIR, the statuses of a number of plant and animal species have changed. This includes the orange-throated whiptail lizard (*Aspidoscelis hyperythra*) which used to be a State Species of Special Concern and is now currently on the State Watch List, and Robinson's pepper-grass (*Lepidium virginicum* var. *robinsonii*) which was previously ranked as 1B.2 (Rare, Threatened, or Endangered in California and Elsewhere) and is now ranked as 4.3 (Plants of limited distribution). Palmer's jackass clover (*Wislizenia divaricate*) (Rank 2B.2) has been added to the list California Native Plant Society Rare Plant Rank, and the tricolored blackbird (*Agelaius tricolor*) has been upgraded to a California Endangered Species Act Candidate Endangered species.

2.4.2 Regulatory Framework

Section 2.4.2 of the 2011 PEIR included a discussion of regulatory framework related to biological resources in the unincorporated County. The regulations described in the 2011 PEIR are the same as the regulations evaluated in this SEIR, with the exception of an update to the MSCP, the Conservation Agreement for MSCP Plan, the Watershed Protection, Stormwater Management and Discharge Control Ordinance (WPO), and the Habitat Loss Permit Ordinance described below. All references used from the 2011 PEIR were reviewed to ensure they are still valid today, and are hereby incorporated by reference.

Multiple Species Conservation Program

The MSCP South County Subarea Plan was adopted in 1998, and the County is currently developing additional MSCP Plans for the North County and East County areas. The North County Plan is in draft form and was circulated for public review in 2009, however; it is not yet finalized. It will include the unincorporated lands under the County's jurisdiction in the northwestern and central parts of the County, from north of Camp Pendleton at the Riverside County line to southeast of Ramona, including Fallbrook, Rainbow, Bonsall, Pala-Pauma, the western flanks of Palomar Mountain, Valley Center, and San Dieguito where a small portion reaches the coastline. The draft North County Plan will not be adopted prior to the public review of this SEIR. To facilitate discretionary processes and preserve buildout while the North County Plan is being drafted, the County, USFWS, and California Department of Fish and Wildlife (CDFW) entered into a Planning Agreement for the Draft North County Plan (County 2014). This Agreement defines the geographic scope of the Planning Area, identifies preliminary conservation objectives, ensures coordination between the wildlife agencies, and establishes a process to review interim development within the Planning Area to help achieve the preliminary conservation objectives and preserve options for establishing a viable reserve system or equivalent long-term conservation measures. The North County Plan 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 29 species.

The system of corridors and linkages that comprise the adopted South County Subarea Plan runs through the southwest portion of unincorporated County. The South County Subarea Plan identifies core habitat areas and linkages between them. Corridors and linkages are also identified in the draft North County Plan; however, this Plan has not been adopted. Figure 2.4-1 identifies the adopted South County Subarea Plan corridors and linkages and those proposed in the North County and East County plans. It should be noted that progress on the East County Plan has slowed significantly, since the preliminary draft map was released in 2008.

County of San Diego Code of Regulatory Ordinances Sections 67.801-67.814, Watershed Protection, Stormwater Management, and Discharge Control Ordinance

The purpose of the WPO, adopted in 2002 and updated in 2016, is to protect water resources and to improve water quality. The purpose of the amendment is to implement the Jurisdictional Runoff Management Program and comply with the 2015 National Pollutant Discharge Elimination (NPDES) Municipal Separate Storm Sewer System This ordinance: (1) prohibits polluted non-stormwater discharge to the stormwater conveyance system and receiving waters; (2) establishes requirements to prevent and reduce pollution to water resources; (3) establishes requirements for development project site design to reduce stormwater pollution and erosion; (4) establishes requirements for the management of stormwater flows from development projects to prevent erosion and to protect and enhance existing water-dependent habitats; (5) establishes standards for the use of off-site facilities for stormwater management to supplement on-site practices at new

development sites; (6) establishes notice procedures and standards for adjusting stormwater and non-stormwater management requirements; and (7) ensures that the County is compliant with applicable federal and State laws. The ordinance applies to all projects requiring certain discretionary or ministerial approval in the unincorporated County that are not already regulated under a valid facility-specific NPDES permit or facility-specific Regional Water Quality Control Board Waste Discharge Requirements permit. The ordinance applies to, but is not limited to, projects that require a tentative map, grading permit, or building permit. Projects are required to submit plans demonstrating how the requirements of the WPO would be met for the project to be approved.

County of San Diego Code of Regulatory Ordinances Sections 86.501-86.509, Habitat Loss Permit Ordinance

The Habitat Loss Permit Ordinance was adopted in March 1994 and amended in 2012 in response to both the listing of the coastal California gnatcatcher as a federally threatened species and the adoption of the Natural Community Conservation Plan (NCCP) Act by the State of California. Pursuant to the Special 4(d) Rule under the Endangered Species Act, the County is authorized to issue “take permits” for the coastal California gnatcatcher (in the form of a Habitat Loss Permit) in lieu of Section 7 or Section 10(a) permits, which are typically required from the USFWS. Although issued by the County, the wildlife agencies (USFWS and CDFW) must concur with the issuance of the Permit for it to become valid as take authorization under the Endangered Species Act. The Ordinance states that projects must obtain a Habitat Loss Permit prior to the issuance of a grading permit, clearing permit, or improvement plan if the project will directly or indirectly impact any coastal sage scrub habitat types. The Permit is required if coastal sage scrub or related habitat will be impacted, regardless of whether or not the site is currently occupied by coastal California gnatcatchers. Permits are not required for projects within the boundaries of an adopted MSCP Plan since take authorization is conveyed to those projects through compliance with the MSCP Plan.

San Diego County Board of Supervisors Policy I-123, Conservation Agreement for the Multiple Species Conservation Program

This policy establishes the process for the County to acquire habitat for MSCP Preserve lands at minimal public cost, while providing incentives for voluntary landowner participation in the program. The implementing mechanism is a conservation agreement through which a landowner would permanently set aside land which contributes to the County's MSCP Preserve in exchange for certain financial and permitting benefits. The property owner would receive Third Party Beneficiary Status, be included under the County MSCP Plan, and have the potential to qualify for reductions in water availability stand-by charges provided by the Metropolitan Water District of Southern California or SDCWA.

2.4.3 Analysis of Project Impacts and Determination of Significance

A thorough review of available relevant maps, databases, and literature pertaining to biological resources known to occur within the PSR Analysis Areas and the former CGSP Area was performed. Aerial imagery (Google Earth 2016), vegetation maps (SANDAG 2016), national wetland inventory (USFWS 2016a) and other maps of the project area and vicinity were reviewed to obtain updated information on the natural environmental setting. In addition, a query of sensitive species and habitat databases was conducted, including the California Natural Diversity Database (CDFW 2016), and the California Native Plant Society Electronic Inventory (CNPS 2016), as well as a review of regional lists produced by the CDFW (CDFW 2016). The review also included a

verification of whether or not the PSR Analysis Areas or former CGSP Area fall within areas designated as final or proposed USFWS Critical Habitat for federally threatened or endangered species (USFWS 2016b).

2.4.3.1 Issue 1: Special Status Plant and Wildlife Species

Guidelines for Determination of Significance

Based on Appendix G of the CEQA Guidelines and the County of San Diego Guidelines for Determining Significance, Biological Resources (DPLU 2010a), 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 CDFW or USFWS. The San Diego County Guidelines indicate that the following information should be evaluated in order to provide evidence to support a determination of impact significance.

- The project would impact one or more individuals of a species listed as federally or State endangered or threatened.
- The project would impact an on-site population of a County List A or B plant species or a County Group 1 animal species (listed in Table 2.4-1: those that have a very high level of sensitivity, either because they are listed as threatened or endangered or because they have very specific natural history requirements that must be met) or a species listed as a State Species of Special Concern. Impacts to these species are considered significant; however, impacts of less than 5 percent of the individual plants or of the sensitive species' habitat on a project site may be considered less than significant if a biologically-based determination can be made that the project would not have a substantial adverse effect on the local long-term survival of that plant or animal taxon.
- The project would impact the local (defined by the boundaries of the County's multiple species conservation plans) long-term survival of a County List C or D plant species or a County Group 2 animal species (listed in Table 2.4-1: includes those species that are becoming less common, but are not yet so rare that extirpation or extinction is imminent without immediate action. These species tend to be prolific within their suitable habitat types).
- The project may impact arroyo toad aestivation, foraging or breeding habitat. Any alteration of suitable habitat within 1 kilometer (3,280 feet) in any direction of occupied breeding habitat or suitable stream segments (unless very steep slopes or other barriers constrain movement) would only be considered less than significant if a biologically-based determination can be made that the project would not impact the aestivation or breeding behavior of arroyo toads.
- The project would impact golden eagle habitat. Any alteration of habitat within 4,000 feet of an active golden eagle nest would only be considered less than significant if a biologically-based determination can be made that the project would not have a substantially adverse effect on the long-term survival of the identified pair of golden eagles.
- The project would result in the loss of functional foraging habitat for raptors. Impacts to raptor foraging habitat is considered significant; however, impacts of less than 5 percent of the raptor foraging habitat on a project site may be considered less than significant if a

biologically-based determination can be made that the project would not have a substantial adverse effect on the local long-term survival of any raptor species.

- The project would impact the viability of a core wildlife area, defined as a large block of habitat (typically 500 acres or more not limited to project boundaries, though smaller areas with particularly valuable resources may also be considered a core wildlife area) that supports a viable population of a sensitive wildlife species or supports multiple wildlife species.
- The project would cause indirect impacts, particularly at the edge of proposed development adjacent to proposed or existing open space or other natural habitat areas, to levels that would likely harm sensitive species over the long term.
- The project would impact occupied burrowing owl habitat.
- The project would impact occupied cactus wren habitat, or formerly occupied coastal cactus wren habitat that has been burned by wildfire.
- The project would impact occupied Hermes copper habitat.
- The project would impact nesting success of sensitive bird species, including coastal cactus wren, coastal California gnatcatcher, least bell's vireo, southwestern willow flycatcher, tree-nesting raptors, ground-nesting raptors, golden eagle and light-footed clapper rail through grading, clearing, fire fuel modification, and/or other noise generating activities such as construction.

Impact Analysis

The 2011 PEIR determined that future development would result in potentially significant direct and indirect impacts related to special status species. The discussion of impacts related to special status species from implementation of the General Plan can be found in Section 2.4.3.1 of the 2011 PEIR, and is hereby incorporated by reference.

Development of increased land use densities consistent with the Proposed Project and construction of new infrastructure to support these land uses have the potential to directly or indirectly impact candidate, sensitive, or special status plant or wildlife species and/or their habitat. Candidate species are species that are eligible for listing as a federal or State threatened or endangered species. Sensitive species are species that have been given special recognition by federal or State agencies, or are included in regional plans due to limited, declining, or threatened populations. Special status species are designated as threatened or endangered by the CDFW or USFWS.

The estimated total impact area (acres) of vegetation classifications found within each of the PSR Analysis Areas and the former CGSP Area are shown in Table 2.4-2. The estimated total acres per vegetation classification are shown in Table 2.4-3. Table 2.4-4 lists the special status species with the potential to occur within the PSR Analysis Areas and former CGSP Area, and associated acreages of their potential habitat.

Direct Impacts

Potential direct impacts of the Proposed Project would include removal of habitat for new development and infrastructure. New buildings and infrastructure in previously undeveloped areas of the PSR Analysis Areas and the former CGSP Area could result in the removal of potential habitats that support sensitive species. Redevelopment under the Proposed Project or

new development in currently urbanized areas would result in fewer impacts to potential habitats, because these areas are generally already disturbed and therefore less able to support sensitive species. Some proposed land uses would result in greater biological impacts than others due to increased development densities. It is likely that the acreages of these communities are underestimated due to a minimum size of features that are not able to be mapped, in addition to the fact that the presence of certain vegetation communities, such as coast live oak trees, would potentially exist within larger vegetation communities. There are also certain areas where the acreages are likely overestimated, due to additional disturbance since vegetation mapping has occurred. Mapping data would require confirmation through site-specific biological resource surveys and project-level mitigation when future discretionary development projects are proposed.

The impact percentage criteria used to estimate the impacts of the Proposed Project are the same criteria used in the 2011 PEIR. The estimated impacts are discussed in greater detail below in Figure 2.4-2. The Proposed Project's estimated impacts to vegetation communities are based on the estimated impacts per designation method used in the 2011 PEIR.

All PSR Analysis Areas and the former CGSP Area proposed for SR-0.5 (SD15-portion), SR-1 (DS24, FB17-portion, NC18A-portion, NC22-portion, NC38+), SR-2 (CD14-portion, FB17-portion, NC18A-portion, PP30-portion, VC7+, VC57+, CG3, CG4, CG5), VR-4.3 (DS8), VR-10.9 (SD15-portion), General Commercial (SD15-portion), Rural Commercial (former CGSP Subareas CG6-portion and CG8-portion), and Medium Impact Industrial (VC67) are estimated to have 100 percent impact to habitat because of the level of vegetation removal that could potentially be required during future land development. Although the higher density areas are assumed to have 100 percent impact for purposes of this SEIR, future projects would be required to demonstrate avoidance of the most sensitive areas, compliance with existing ordinances and conservation plans, and implementation of mitigation measures to reduce impacts.

Lower density residential areas (SR-4) are estimated to result in the removal of 75 percent of vegetation, while also avoiding some areas of natural habitat. PSR Analysis Areas and the former CGSP Area that propose an SR-4 designation include BO18+, FB2+ (portion), ME30A (portion), NC37, VC51, as well as former CGSP Subarea CG2. Semi-rural-10 (SR-10), a lower density than SR-4, is estimated to result in the removal of 50 percent of vegetation, while avoiding roughly half of the natural habitat. PSR Analysis Areas and former CGSP Subareas that propose an SR-10 designation include FB19+, FB21+, ME26, NC3A, NC22 (portion), and CGSP Subareas CG1, CG6 (portion), CG7, and CG8 (portion). Rural Lands designations would have the largest parcel sizes and are estimated to result in an impact range of 5 acres per dwelling unit. The RL-20 designation is anticipated to remove 25 percent of the vegetation and RL-40 is anticipated to remove 12.5 percent of the vegetation. PSR Analysis Areas CD14 (portion) and FB2+ (portion) are proposed for RL-20 and PSR Analysis Areas proposed for RL-40 include ME30A (portion) and PP30 (portion).

Table 2.4-2 provides the estimated total acreage of each vegetation classification over all Analysis Areas. Vegetation map data was gathered from SanGIS (2017) and utilizes the vegetation classification from Holland and Oberbauer (Oberbauer 2005). Table 2.4-4 shows the estimated acreages of vegetation communities per Analysis Area. PSR Analysis Areas and former CGSP Subareas within North County Metro (NC3A, NC18A, NC22, NC37, and NC38+, CG5 and part of CG4) and Fallbrook (FB2+, FB17, FB19+, and FB21+) contain an estimated 719 acres of southern mixed chaparral and 658 acres of Diegan coastal sage scrub habitat. The majority of estimated acreage in PSR Analysis Area CD14 is Diegan coastal sage scrub (85 out of 101 acres). The majority of estimated acreage in PSR Analysis Areas ME26 (439 acres) and ME30A (139 acres) is granitic northern mixed chaparral (578 acres out of 939 acres).

In addition to the habitats discussed above, the PSR Analysis Areas and the former CGSP Area are estimated to include other habitats known to support sensitive plant and wildlife species. These habitats include Sonoran creosote bush scrub in DS24 (168 acres) and coast live oak woodland in BO18+ (7 acres), FB17 (5 acres), FB19+ (9 acres), NC3A (70 acres), NC38+ (1 acre), PP30 (32 acres), VC7+ (8 acres), VC51 (11 acres), VC57+ (19 acres), and former CGSP Subareas CG1, CG6, CG7, CG8 (2 acres), CG5, CG2, CG3, and CG4 (5 acres). Other important habitat community types with the potential to support special status species are described below.

- Coastal sage-chaparral transition is estimated to be found in PSR Analysis Areas FB21+ (65 acres) and PP30 (60 acres).
- Southern cottonwood-willow riparian forest is present with estimated acreages in PSR Analysis Areas BO18+ (4 acres), FB2+ (5 acres), FB17 (10 acres), FB19+ (72 acres), VC7+ (34 acres), VC51 (1 acre), and VC57+ (18 acres).
- Alluvial fan scrub is contained in PSR Analysis Area PP30 (112 estimated acres).
- Southern sycamore-alder riparian woodland is estimated to be found in PSR Analysis Areas BO18+ (5 acres), FB21+ (27 acres), NC22 (10 acres), NC38+ (3 acres), PP30 (40 acres), and VC7+ (7 acres).
- Desert saltbush scrub is contained in PSR Analysis Area DS8 (90 estimated acres).
- Open coast live oak woodland is estimated to be found in PSR Analysis Areas FB21+ (8 acres), ME26 (42 acres), NC3A (3 acres), and PP30 (31 acres).
- Southern coast live oak riparian forest is estimated to be found in PSR Analysis Areas FB2+ (6 acres), FB17 (<1 acre), and FB21+ (49 acres).
- Southern willow scrub is estimated to be found in PSR Analysis Areas FB17 (5 acres), VC7+ (15 acres), VC57+ (13 acres), VC67 (1 acre), and former CGSP Subarea CG2, CG3, CG4 and CG5 (4 acres).

Table 2.4-3 presents approximate acreages of suitable habitat that would support special status species by CPA or Subregion that contain PSR Analysis Areas and former CGSP Area. There are limitations to the accuracy of these acreages and it is likely that they under-represent the potential effects on species as there can be some degree of cross utilization of a number of habitats based on the life history of the species. The presence (or the potential to occur) of sensitive species would require confirmation through site-specific biological resource surveys and project-level mitigation when future discretionary development projects are proposed.

Additionally, the Proposed Project would have the potential to result in impacts to USFWS-designated Critical Habitat for some species of plants and animals. The total amount of designated Critical Habitat in the unincorporated County is about 557,000 acres, and less than one percent of the designated Critical Habitat occurs within the PSR Analysis Areas BO18+, CD14, DS8, DS24, FB2+, FB19+, FB21+, ME26, ME30A, NC3A, NC18A, NC22, NC38+, PP30, SD15, VC7+, and former CGSP Subareas CG1, CG2, CG3, CG4, CG5, CG6, CG7, and CG8. Approximately 70 percent of the County's Critical Habitat is located in areas designated as National Forest or State Parks. The Proposed Project does not propose land uses within federal and State-owned lands. However, future development of land uses outside of federal and State-owned parks would have the potential to result in impacts to designated Critical Habitat. As shown in Table 2.4-4, designated Critical Habitat within the PSR Analysis Areas for those species which may be impacted by the Proposed Project include American badger, arroyo toad, Blainville's horned lizard, coastal California gnatcatcher, Dulzura pocket mouse, felt-leaved monardella, gravel milk-vetch, least Bell's vireo, Jacumba milk-vetch, orange-throated whiptail, Orcutt's

brodiaea, Orcutt's pincushion, Palmer's jackass clover, Peirson's pincushion, quino checkerspot butterfly, rainbow manzanita, Robinson's pepper-grass, Ramona horkelia, rosy boa, San Diego goldenstar, San Diego sunflower, southern California rufous-crowned sparrow, southern jewelflower, southwestern willow flycatcher, summer holly, tricolored blackbird, and western pond turtle.

Adoption of the Valley Center Community Plan Residential Policy 8 Revision would allow for additional minimum lot size flexibility for residential clustering only within SR-2 or SR-4 areas and only within the sewer service area; however, the adoption would not result in an increase in the number of allowed dwelling units. Therefore, implementation of Valley Center Community Plan Residential Policy 8 Revision would not result in a direct impact related to special status plant and wildlife species.

Indirect Impacts

The indirect impacts to sensitive species and their habitat that would have the potential to occur as a result of new development or redevelopment under the Proposed Project are described below.

Water quality in riparian areas would have the potential to be adversely affected by pollutants in runoff and sedimentation under the Proposed Project. Decreased water quality would have the potential to adversely affect the vegetation, aquatic animals, and terrestrial wildlife that depend upon these resources. Refer to Section 2.8 (Hydrology and Water Quality) of this SEIR regarding the potential impacts to water quality that may result from the Proposed Project.

Fugitive dust produced by construction under the Proposed Project would have the potential to disperse onto sensitive vegetation adjacent to construction sites. A continual cover of dust would have the potential to reduce the overall vigor of individual plants by reducing their photosynthetic capabilities and increasing their susceptibility to pests or disease. In turn, this would have the potential to affect animals which are dependent on these plants. Refer to Section 2.3 (Air Quality) of this SEIR regarding the Proposed Project impacts related to fugitive dust during construction. Post development impacts to sensitive species would also occur through increased effects from dust accumulation as a result of additional traffic which would potentially decrease the vigor and fitness of sensitive plants.

Non-native plants would have the potential to colonize development and infrastructure sites and spread into adjacent native habitats. Such colonization may be brought about by vehicles, landscaping, agriculture, runoff, or soil disturbance. Many non-native plants common to the San Diego region are highly invasive and displace native vegetation, thereby affecting sensitive species and reducing native species diversity overall. A reduction in native plant species results in a reduction of native wildlife species.

Edge effects, or changes to a community at the boundary of two habitats would occur if blocks of habitat were fragmented. New construction and new roadways would have the potential to fragment habitats. Brush management and trail construction or use can also result in potentially significant edge effects to special status plants and wildlife species and/or their supporting habitats. The increased edge between development and habitat makes it easier for non-native plant species to invade native habitats and for both native and non-native predators to access prey that would have otherwise been protected within large, contiguous blocks of habitat.

Increases in human activity in and adjacent to undeveloped areas as a result of new development of the Proposed Project land uses would have the potential to result in degradation of sensitive vegetation. This can result in more fragmented habitat and formation of edges through the

creation of unauthorized trails, as well as other impacts such as increased erosion and predation of native species by domesticated animals.

Construction of roadway and utility infrastructure extensions to serve the increased development densities within the PSR Analysis Areas and former CGSP Area would have the potential to deter wildlife movement, degrade existing vegetation, compact soils, change natural runoff patterns, facilitate the invasion of non-native species, and increased chances of fire.

Noise that results in indirect impacts is typically associated with construction activity and post development roadway traffic and noise associated with the new land uses following implementation of the Proposed Project. To avoid noise impacts, breeding birds and mammals may temporarily or permanently leave their territories, which would have the potential to lead to reduced reproductive success and increased mortality.

Night lighting on native habitats would have the potential to provide nocturnal predators with an unnatural advantage over their prey. Artificial light can also disrupt other essential behavioral and ecological processes (e.g., breeding, foraging, migration, etc.). For example, (1) plants depend on darkness for the management of their metabolism; (2) deciduous trees lose their leaves during the fall by the production of hormones that are caused by lengthening nights and do not lose their leaves when light pollution simulates summer's long days and short nights; (3) animals depend on darkness in order to hunt, conceal their location, navigate, or reproduce; (4) mammals waste energy trying to stay away from lighted areas; (5) some physiological processes only happen in the dark, such as resting, repairing, or charging of systems; (6) birds use dark skies to navigate during bi-annual migrations; and (7) migrating birds can become disoriented when they fly through an artificially brightened area. Outdoor lighting used in the development or redevelopment of residential, commercial, industrial, or public/semi-public uses would have the potential to result in a new source of glare and/or lighting.

The magnitude of indirect effects, such as those described above, increase greatly with increased densities for development. In rural areas of the County, densities of one dwelling unit per 40 acres or greater have a substantially more severe impact on biological resources, especially sensitive resources, than lower development densities (CBI 2005). This is primarily due to the extent of direct habitat loss, fragmentation, and edge effects associated with higher densities in rural areas (CBI 2005). Because the Proposed Project includes increased development density, associated project activities have the potential to cause significant indirect impacts.

Adoption of the Valley Center Community Plan Residential Policy 8 Revision would allow for additional minimum lot size flexibility for residential clustering only within SR-2 or SR-4 areas and only within the sewer service area; however, the adoption would not result in an increase in the number of allowed dwelling units. Therefore, implementation of Valley Center Community Plan Residential Policy 8 Revision would not result in an indirect impact related to special status plant and wildlife species.

Numerous federal, State, and local regulations applicable to the PSR Analysis Areas and the former CGSP Area are in place to protect special status species and summarized below.

The Federal Migratory Bird Treaty Act prohibits the disturbance of migratory birds including raptors. In addition, the Bald and Golden Eagle Protection Act limits impacts to bald eagles and golden eagles. The Federal Endangered Species Act requires a Section 7 or Section 10 process be undertaken if a project would result in take of a federally listed species, while the California Endangered Species Act prohibits take of State-listed species without securing a Section 2081 permit. These permits may also be achieved through NCCP plans such as the MSCP Plans.

The Southern California Coastal Sage Scrub NCCP is applicable to the Proposed Project. This program enables the County to benefit from interim take provisions established in the USFWS Special Rule 4(d). The County is allowed a loss of up to 5 percent of its coastal sage scrub habitat if it is actively developing a comprehensive NCCP for the area. The interim take refers to the authorization for removal of coastal sage scrub and/or any incidental impacts to target species (such as California gnatcatcher and orange-throated whiptail) if achieved in accordance with findings set forth in the NCCP Process Guidelines. The Habitat Loss Permit Ordinance allows the County to issue these interim “take permits” in the form of Habitat Loss Permits for projects impacting California gnatcatcher and/or coastal sage scrub habitat.

Discretionary projects located outside an existing MSCP Plan area that potentially affect sensitive species and habitats other than coastal California gnatcatcher and coastal sage scrub are evaluated using the County Guidelines for Determining Significance for Biological Resources.

Certain discretionary projects are also subject to the County Resource Protection Ordinance. While this ordinance does not address individual special status species, it does protect resources inhabited or utilized by such species, such as sensitive habitat lands, wetlands, and wetland buffers.

Per the County of San Diego Zoning Ordinance, a zoning designation or Special Area Regulation with certain restrictions related to biological resources is applied to some areas with sensitive biological resources. Zoning designations include Ecological Resource Area Regulations or a Special Area Designator for sensitive resources, coastal resources, or vernal pools.

For the purpose of this SEIR, impacts to sensitive species habitats would represent a potentially significant impact to special status plant and wildlife species. **Overall, the Proposed Project would have the potential to result in direct and indirect impacts to habitat types that support sensitive plant and wildlife species (Impact BI-1).**

2.4.3.2 Issue 2: Riparian Habitat and Other Sensitive Natural Communities

Guidelines for Determination of Significance

Based on Appendix G of the CEQA Guidelines and County Guidelines for Biological Resources, 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 2011 PEIR determined that future development would result in potentially significant effects on any riparian habitats and other sensitive natural communities. The discussion of impacts related to special status species from implementation of the General Plan can be found in Section 2.4.3.2 of the 2011 PEIR, and is hereby incorporated by reference.

Section 2.4.3.1 describes the impact of the Proposed Project to sensitive natural communities in the PSR Analysis Areas. As stated in that section, the Proposed Project would result in potentially significant impacts to sensitive habitats in the County from direct and indirect impacts associated with proposed PSR Analysis Area land use density or intensity increases. Therefore, the following section focuses solely on riparian habitats. Riparian communities occur along rivers, streams, and other drainages. According to the Riparian Bird Conservation Plan (CPF 2004), riparian habitats are defined as habitats along the banks or otherwise adjacent to freshwater bodies, watercourses,

estuaries, and other surface waters. These areas can be perennial, intermittent, or ephemeral. Riparian areas connect terrestrial and aquatic habitats and provide linkages between water bodies and upstream vegetation communities. The available water provides soil moisture in excess of that typically available in upland habitats.

Direct Impacts

Similar to other vegetation communities, direct impacts to riparian habitats would include removal or disturbance due to new development. Potential direct impacts to riparian habitats were estimated using the same methodology described above in Section 2.4.3.1. The acreage of riparian habitat within the PSR Analysis Areas and the former CGSP Area that would potentially be impacted by the Proposed Project is provided in Table 2.4-4. Figure 2.4-1 shows the estimated impacts by land use designation in the PSR Analysis Areas and the former CGSP Area.

Several PSR Analysis Areas and former CGSP Area contain riparian habitat, such as alkali seep, alluvial fan scrub, coastal and valley freshwater marsh, disturbed wetland, freshwater, freshwater marsh, southern coast live oak riparian forest, southern cottonwood-willow riparian forest, southern sycamore-alder riparian woodland, southern riparian scrub, and southern willow scrub. PSR Analysis Areas with estimated riparian habitats (based on current GIS mapping) include BO18+, FB2+, FB17, FB19+, FB21+, ME30A, NC18A, NC22, NC38+, PP30, VC7+, VC51, VC57+, VC67, and former CGSP Subareas CG2, CG3, CG4, and CG5. As shown in Table 2.4-1, the largest single riparian habitat type within a PSR Analysis Area would be the 112 acres of alluvial fan scrub estimated within PSR Analysis Area PP30; however, the area mapped for this vegetation community is completely within the portion proposed to remain RL-40 (so no changes are proposed for this portion of the Analysis Area). PSR Analysis Area BO18+ contains approximately 9 acres of riparian habitat (southern cottonwood-willow riparian forest and southern sycamore-alder riparian woodland). A total of 186 acres of riparian habitat (southern coast live oak riparian forest, southern cottonwood-willow riparian forest, southern riparian scrub, southern sycamore-alder riparian woodland, southern willow scrub and freshwater) exists within PSR Analysis Areas FB2+, FB17, FB19+, and FB21+. PSR Analysis Area ME30A is estimated to contain 81 acres of alkali seep and 6 acres of freshwater marsh; however, the area mapped with these vegetation communities is completely within the portion proposed to remain RL-40 (so no changes are proposed for this portion of the Analysis Area). Less than one acre of southern riparian scrub habitat is GIS mapped in PSR Analysis Area NC18A. Approximately 40 acres of southern sycamore-alder riparian woodland is GIS mapped in PSR Analysis Area PP30; however, like the alluvial fan scrub mapped in PP30, the area mapped for this vegetation community is completely within the portion proposed to remain RL-40 (so no changes are proposed for this portion of the Analysis Area). GIS mapping shows 15 acres of riparian habitat consisting of southern sycamore-alder riparian woodland (13 acres) and freshwater marsh (1 acre) occurs within PSR Analysis Areas NC22 and NC38+. Within the Valley Center CPA, GIS mapping shows 99 acres of riparian habitat, including 1 acre of disturbed wetland and 5 acres of coastal and valley freshwater marsh in the PSR Analysis Area VC57+; 90 acres of southern cottonwood-willow riparian forest, southern willow scrub, and southern sycamore-alder riparian woodland within PSR Analysis Areas VC7+, VC51, VC57+, VC67, and former CGSP Subareas CG2, CG3, and CG4; and 3 acres of freshwater habitat within VC57+.

In summary, the PSR Analysis Areas and former CGSP Area contain approximately 552 acres of riparian habitat, per GIS mapping estimates. As shown in Table 2.4-5, the CPAs and Subregions with the greatest acreage of riparian habitat are the Fallbrook CPA (187 acres), Pala-Pauma Subregion (152 acres), Valley Center CPA (99 acres), and North County Metro (15 acres). GIS mapping currently shows no riparian habitat within PSR Analysis Areas CD14, DS8, DS24, ME26,

and SD15. Table 2.4-1 lists the estimated overall acreage of each riparian vegetation community (per GIS mapping).

Adoption of the Valley Center Community Plan Residential Policy 8 Revision would allow for additional minimum lot size flexibility for residential clustering only within SR-2 or SR-4 areas and only within the sewer service area; however, the adoption would not result in an increase in the number of allowed dwelling units. Therefore, implementation of Valley Center Community Plan Residential Policy 8 Revision would not result in a direct impact related to riparian habitat and other sensitive natural communities.

Indirect Impacts

Indirect impacts to riparian habitats that would have the potential to result from future development within the PSR Analysis Areas and the former CGSP Area include degradation of water quality due to runoff from new urban development, drawdown of the groundwater table by new groundwater-dependent development that depletes the water supply available to riparian vegetation, and the introduction of invasive species. Development under the Proposed Project would potentially modify the natural flow of streams, which would consequently impact aquatic and riparian communities and species dependent on natural streamflow. Additional impervious surface area would also have the potential to increase storm water runoff, peak discharges, and flood magnitude downstream (CBI 2005). These changes would similarly result in modified streamflow or introduction of pollutants to riparian habitats. As further discussed in Sections 2.8.3.1 and 2.8.3.3 (Hydrology) of this SEIR, it is expected that non-point source pollutants caused by development of the proposed land uses would potentially degrade water quality within County surface waters. Additionally, implementation of the Proposed Project would potentially result in significant impacts to groundwater supply and recharge (Section 2.8.3.2 of this SEIR). These direct hydrological effects would, therefore, result in potentially significant indirect impacts to riparian habitats.

Additional post development impacts associated with the Proposed Project include increased dust and noise. Post development impacts to riparian habitats and other sensitive natural communities would occur through increased effects from dust accumulation as a result of additional traffic which would potentially decrease the vigor and fitness of sensitive plants. Noise that results in indirect impacts is typically associated with construction activity and post development roadway traffic and noise associated with the new land uses following implementation of the Proposed Project. To avoid noise impacts, breeding birds and mammals may temporarily or permanently leave their territories, which would have the potential to lead to reduced reproductive success and increased mortality.

Adoption of the Valley Center Community Plan Residential Policy 8 Revision would allow for additional minimum lot size flexibility for residential clustering only within SR-2 or SR-4 areas and only within the sewer service area; however, the adoption would not result in an increase in the number of allowed dwelling units. Therefore, implementation of Valley Center Community Plan Residential Policy 8 Revision would not result in an indirect impact related to riparian habitat and other sensitive natural communities.

As noted in Section 2.4.3.1 for Issue 1, numerous federal, State and local regulations exist to protect sensitive natural communities identified in local or regional plans, policies, regulations, or by CDFW or USFWS. In addition, there are a number of federal, State, and local regulations in place to protect riparian habitat. The Clean Water Act (CWA) regulates certain impacts to federally protected wetlands as well as non-wetland waters of the U.S. The Fish and Game Code Section

1602, the California Lake and Streambed Alteration Program requires written notification to CDFW prior to altering a riparian area supported by a lake, river, or stream.

On the local level, the County Resource Protection Ordinance restricts certain impacts to wetlands, wetland buffers, floodways, and floodplain fringe areas. The WPO is applied to development permits to minimize impacts to wetlands and water bodies. Additionally, per the County of San Diego Zoning Ordinance, some sensitive lands have Special Area Designators for floodplains, flood channels, or vernal pools.

Estimates from GIS mapping show riparian habitat occurring within PSR Analysis Areas BO18+, FB2+, FB17, FB19+, FB21+, ME30A, NC18A, NC22, NC38+, PP30, VC7+, VC51, VC57+, and VC67, as well as the former CGSP Subareas CG2, CG3, CG4, and CG5. **Therefore, implementation of the Proposed Project would result in potentially significant direct and indirect impacts to riparian habitat (Impact BI-2).**

2.4.3.3 Issue 3: Federally Protected Wetlands

Guidelines for Determination of Significance

Based on Appendix G of the CEQA Guidelines and County of San Diego Guidelines for Determining Significance Biological Resources (DPLU 2010a), the Proposed Project would result in a significant impact if it would have a substantial adverse effect on federally protected wetlands as defined by the CWA Section 404 through direct removal, filling, hydrological interruption, or other means.

Impact Analysis

The 2011 PEIR determined that future development would result in potentially significant direct and indirect impacts to federally protected wetlands. The discussion of impacts to federally protected wetlands from implementation of the General Plan can be found in Section 2.2.3.3 of the 2011 PEIR, and is hereby incorporated by reference.

Federally protected wetlands are defined in the Clean Water Act Section 404 as areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, certain riparian areas and similar areas. Table 2.4-6 summarizes the wetland types within PSR Analysis Areas and the former CGSP Area. Figure 2.4-2 displays the areas of potential wetland occurrence within all PSR Analysis Areas. The mapping data used to identify wetland areas potentially impacted by the Proposed Project is conceptual in nature and would need to be verified through site specific project level surveys and mitigation requirements.

Direct impacts to federally protected wetlands would occur if the increased development densities allowed in the PSR Analysis Areas resulted in the removal, filling, hydrological interruption, or other disturbance to these resources. For the purpose of this SEIR, County wetlands GIS data was utilized to determine the location and acreages of wetland areas within the PSR Analysis Areas and former CGSP Area. These generalized areas were included in the impact analysis wherever they overlapped with the Proposed Project land-use designations, as described in the direct impacts discussion in Section 2.4.3.1 (Special Status Plant and Wildlife Species) above. Impacts were not limited to areas where federally protected wetlands have been determined to occur. Actual impacts to federally protected wetlands can only be determined through site specific surveys, a wetland delineation, and project-level information.

As summarized in Table 2.4-6, approximately 548 acres of federally protected wetlands would have the potential to be impacted within the PSR Analysis Areas and the former CGSP Area. PSR Analysis Areas and the former CGSP Area that potentially contain federally protected wetlands (based on current GIS mapping) include BO18+ (8 acres), FB2+ (12 acres), FB17 (15 acres), FB19+ (73 acres), FB21+ (87 acres), ME30A (87 acres), NC18A (<1 acre), NC22 (11 acres), NC38+ (3 acres), PP30 (152 acres), VC7+ (56 acres), VC51 (1 acre), VC57+ (39 acres), VC67 (1 acre), and former CGSP Subareas CG2, CG3, CG4-portion (<1 acre), and CG4-portion and CG5 (3 acres). These areas would have the potential to result in substantial habitat loss of federally protected wetlands by direct removal (e.g. clearing, grading, or grubbing).

Adoption of the Valley Center Community Plan Residential Policy 8 Revision would allow for additional minimum lot size flexibility for residential clustering only within SR-2 or SR-4 areas and only within the sewer service area; however, the adoption would not result in an increase in the number of allowed dwelling units. Therefore, implementation of Valley Center Community Plan Residential Policy 8 Revision would not result in an impact related to federally protected wetlands.

Numerous federal, State, and local regulations are applicable to the Proposed Project that would limit impacts to federally protected wetlands. At the federal level, the Clean Water Act prohibits the discharge of pollutants or fill materials in waters of the U.S. without obtaining a USACE Section 404 permit and a Section 401 certification from the Regional Water Quality Control Board. At the State level, the Lake and Streambed Alteration Program requires written notification to CDFW prior to altering a riparian area (a type of wetland) supported by a lake, river, or stream, including federally protected wetlands. For water quality impacts to all wetlands, the California Porter-Cologne Water Quality Control Act directs the Regional Water Quality Control Board to develop regional Basin Plans, which, for the San Diego Region, is designed to preserve and enhance the quality of water resources in the region. At the local level, the Resource Protection Ordinance restricts impacts from certain project types to various wetlands, wetland buffers, floodways, and floodplain fringe areas, which would potentially contain federally protected wetlands. In addition, both the WPO and the Zoning Ordinance include special protections for wetlands that would apply to federally protected wetlands.

Even with these programs and measures in place, the impacts would not be reduced to a level below significant. Therefore, the Proposed Project could result in a potentially significant impact to federally protected wetlands (Impact BI-3).

2.4.3.4 Issue 4: Wildlife Movement Corridors and Nursery Sites

Guidelines for Determination of Significance

Based on Appendix G of the CEQA Guidelines and County of San Diego Guidelines for Determining Significance Biological Resources (DPLU 2010a), 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 2011 PEIR determined that future development would result in potentially significant direct and indirect impacts to wildlife movement corridors. The discussion of impacts related to wildlife movement corridors from implementation of the General Plan can be found in Section 2.2.3.4 of the 2011 PEIR, and is hereby incorporated by reference.

Wildlife Corridors

Within the PSR Analysis Areas and former CGSP Area, there are identified and designated core resource areas and linkages, as shown in Figure 2.4-1. This figure identifies core areas and linkages in the South County Subarea Plan, and those regional linkages identified and designated in the draft North County Subarea Plan. The draft North County Subarea Plan does not include core areas, but does identify draft Pre-Approved Mitigation Areas (PAMA), as shown in Figure 2.4-1. A PAMA is an area with high biological value in which conservation will be encouraged. This will be done by providing mitigation ratios that favor developing outside of the PAMA and mitigating inside of the PAMA. These areas may also be targets for conservation acquisitions from willing sellers when funding is available. Areas of draft PAMA do not fall within small, isolated patches of habitat, but rather connected corridors that have been determined as important for maintaining and improving the populations of a number of sensitive species that are covered in the corresponding Subarea plans. The East County Subarea Plan is in an earlier stage of development than the North County Subarea Plan, so the current draft map for East County is very preliminary and subject to changes once that plan resumes preparation. As shown in Figure 2.4-1, the draft map for the East County Subarea Plan shows draft Focused Conservation Areas (FCAs), which are intended to serve a similar function to PAMA. Increases in allowed density/intensity associated with the Proposed Project may cause potential impacts within these regional linkages, designated PAMA/Core Resource Area (South County MSCP), draft PAMA (North County MSCP), and draft FCA (East County MSCP). The PSR Analysis Areas within these areas include BO18+, CD14, FB2+, FB19+, FB21+, ME26, ME30A, NC3A, NC18A, NC22, NC37, PP30, SD15, VC7+, and former CGSP Subareas CG1, CG2, CG3, CG4, CG5, CG6, and CG8.

Intensified development in these areas could result in direct and indirect impacts to the wildlife movement corridors present within these areas. Direct impacts to wildlife movement corridors generally occur from removal of habitat for development, blockage or interference with the connectivity between blocks of habitat, a decrease in the width of a corridor or linkage that constrains movement, or the loss of visual continuity within a linkage or corridor. For example, roadway and utilities extensions to serve future development in the PSR Analysis Areas would have the potential to block a connection between two habitats or increased development land use densities would have the potential to present a visual barrier that discourages wildlife movement within a linkage or corridor. Indirect impacts would occur from increased noise levels, nighttime lighting, activity in or near the linkage or corridor by humans and domestic animals, and other artificial introductions that would discourage movement within corridors or linkages.

Official corridor and linkage designations have not been established outside the South County Subarea Plan boundary; however, buildout of the Proposed Project in the northern and eastern areas of the unincorporated County would have the potential to result in direct or indirect impacts to functioning wildlife movement paths and habitat linkages (**Impact BI-4**).

Nursery Sites

Future development under the Proposed Project would have the potential to result in significant impacts to nursery sites. Nursery sites are located throughout the unincorporated County and include areas that provide the resources necessary for reproduction of a species, including foraging habitat, breeding habitat, and water sources. Determining whether or not a specific area is a nursery site requires field surveys, which are often only valid for a given breeding season depending on the wildlife species present. As described in Section 2.4.3.1 for Issue 1, the Proposed Project would result in a potentially significant impact to sensitive natural habitats in the County, and various natural habitats have the potential to include nursery sites. Direct impacts to nursery sites from implementation of the Proposed Project would include removal of habitat for

development and infrastructure. Indirect impacts to nursery sites would have the potential to result from noise, lighting, changes in drainage patterns, and introduction of pests or domestic animals. These impacts can substantially interfere with native wildlife nursery sites. Therefore, the Proposed Project would have the potential to directly and indirectly impact nursery sites (**Impact BI-4**).

Adoption of the Valley Center Community Plan Residential Policy 8 Revision would allow for additional minimum lot size flexibility for residential clustering only within SR-2 or SR-4 areas and only within the sewer service area; however, the adoption would not result in an increase in the number of allowed dwelling units. Therefore, implementation of Valley Center Community Plan Residential Policy 8 Revision would not result in an impact related to wildlife movement corridors and nursery sites.

There are a number of federal, State, and local regulations applicable to the Proposed Project that protect wildlife movement corridors in the County. At the State level, the NCCP Act facilitates region-wide conservation efforts. As part of the process in determining natural community conservation areas, wildlife movement corridors are considered. The County has one approved NCCP, which is the MSCP South County Subarea Plan in the southwest portion of the unincorporated County. Regional habitat linkages and corridors have been identified in this conservation plan. Pursuant to the Biological Mitigation Ordinance, development projects must generally avoid corridors and linkages within the MSCP to the maximum extent practicable.

The County is preparing NCCP plans (north and east) to cover the remaining lands under the County's jurisdiction. Potential habitat linkages and corridors have been identified for the draft North County Plan (and in more of a preliminary stage for East County); however, these features will not be formally designated until the plan is adopted. Until these plans are in effect, the County will continue to use all available biological data and mapping applications to identify potential movement paths and nursery sites. The County's Guidelines for Determining Significance for Biological Resources are then used to evaluate the potential effects of private and public projects on wildlife movement, corridors, and nursery sites.

Even with these programs and measures in place, the impacts would not be reduced to a level below significant. Therefore, the Proposed Project could result in a potentially significant impact to wildlife corridors and nursery sites (Impact BI-4).

2.4.3.5 Issue 5: Local Policies and Ordinances

Guidelines for Determination of Significance

Based on Appendix G of the CEQA Guidelines and County of San Diego Guidelines for Determining Significance, Biological Resources (DPLU 2010a), 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 2011 PEIR evaluated impacts from the adoption of the goals and policies of the General Plan countywide, including the PSR Analysis Areas, but did not consider the increased density proposed under the Proposed Project. The 2011 PEIR determined that buildout under the General Plan would result in less than significant direct impacts related to compliance with local policies and ordinances protecting biological resources such as sensitive species, habitat, wetlands, riparian habitat and habitat corridors/linkages. These resources are all included in the County's local policies and ordinances that protect biological resources, including MSCP, Resource

Protection Ordinance, Biological Mitigation Ordinance, and Habitat Loss Permit Ordinance. These impacts were determined to be less than significant based on the implementation of and adherence to existing regulations, policies, plans and guidelines.

The Proposed Project would result in land use changes that would increase the allowed density and/or development intensity of the proposed PSR Analysis Areas and the former CGSP Area; however, it does not include proposals to allow development in areas designated for biological preservation. Furthermore, the Biological Mitigation Ordinance, Resource Protection Ordinance, and Habitat Loss Permit are intended for projects with a specific development plan. Future development projects that may be proposed would be required to comply with the County Biological Mitigation Ordinance, Resource Protection Ordinance, and Habitat Loss Permit Ordinance. Therefore, the Proposed Project would not result in significant direct impacts associated with consistency with local policies and ordinances protecting biological resources.

Adoption of the Valley Center Community Plan Residential Policy 8 Revision would allow for additional minimum lot size flexibility for residential clustering only within SR-2 or SR-4 areas and only within the sewer service area; however, the adoption would not result in an increase in the number of allowed dwelling units. Therefore, implementation of Valley Center Community Plan Residential Policy 8 Revision would not result in a conflict related to local policies and ordinances.

There are no State and/or federal regulations that apply to this issue. However, some projects would require consultation with the USFWS and/or the CDFW depending on the resources affected and the jurisdictional regulations in place.

The potentially direct effects on local policies and ordinances resulting from implementation of the Proposed Project would be less than significant due to required compliance with existing regulations, policies, plans, and guidelines.

2.4.3.6 Issue 6: Habitat Conservation Plans and Natural Community Conservation Plans

Guidelines for Determination of Significance

Based on Appendix G of the CEQA Guidelines and County of San Diego Guidelines for Determining Significance, Biological Resources (DPLU 2010a), the Proposed Project would result in a significant impact if it would conflict with the provisions of an adopted Habitat Conservation Plan (HCP), NCCP, or other approved local, regional, or State HCP.

Impact Analysis

The 2011 PEIR evaluated impacts from the adoption of the goals and policies of the General Plan countywide but did not consider the increased density proposed under the Proposed Project. The 2011 PEIR determined that buildout under the General Plan would result in a less than significant direct impact 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 and adherence to existing regulations, policies, plans and guidelines.

The South County MSCP is the only adopted conservation plan applicable to the Proposed Project; however, the draft North and East County MSCP plans are currently under development. The MSCPs (South, North, and East County) identify PAMA, which are areas that may have high biological value in which conservation is encouraged. Within the draft East County Subarea Plan (in more of a preliminary stage than the North County Subarea Plan in process), draft FCAs have been identified, which would serve a similar purpose to a PAMA. PSR Analysis Areas CD14

(within the South County MSCP) and BO18+, FB2+, FB19+, FB21+, NC3A, NC22, NC37, PP30, SD15, VC7+, and all former CGSP areas (within the draft North County MSCP) contain areas that are designated as adopted or draft PAMA. The amount of PAMA land varies within these PSR Analysis Areas. As shown in Figure 2.4-1, all or the majority of the PSR Analysis Areas CD14, PP30, SD15, FB2+, FB19+, FB21+, NC3A, NC22, and former CGSP Subareas CG1, CG2, CG3, CG4, CG6, and CG8 are designated for PAMA (draft for all except CD14, which is in the adopted South County Subarea Plan). Whereas, less than half of the Analysis Areas for BO18+, NC37, VC7+, and former CGSP Subarea CG5 are designated for draft PAMA. In the draft East County Subarea Plan, the majority of ME30A and less than half of ME26 are within the draft FCA area.

The Southern California Coastal Sage Scrub NCCP requires the evaluation of potential impacts to coastal sage scrub. PSR Analysis Areas BO18+, CD14, FB2+, FB17, FB19+, FB21+, NC3A, NC18A, NC22, NC37, PP30, SD15, VC7+, VC51, VC57+, and the former CGSP Subareas are all estimated to contain coastal sage scrub (Table 2.4-4). Future development within these Analysis Areas would require a detailed evaluation of the habitat that includes quality, density, and connectivity of coastal sage scrub in the subregional categories of the NCCP. Therefore, development in PSR Analysis Areas BO18+, CD14, FB2+, FB17, FB19+, FB21+, NC3A, NC18A, NC22, NC37, PP30, SD15, VC7+, VC51, VC57+, and the former CGSP Subareas could result in potential impacts to coastal sage scrub.

There are numerous federal, State, and local regulations in place to ensure that adopted HCPs, NCCPs, and other conservation plans are successful. The Federal Endangered Species Act provides the basis for preparing an HCP under Section 10 for the purpose of issuing incidental take permits. Each HCP includes a method for monitoring and evaluating its success. The HCP Handbook released in November 1996 establishes the general process. A revision to the HCP handbook, provided in 2016, expanded upon the process to include biological goals and adaptive management strategies. Such strategies have also been included in the State NCCP process.

Adoption of the Valley Center Community Plan Residential Policy 8 Revision would allow for additional minimum lot size flexibility for residential clustering only within SR-2 or SR-4 areas and only within the sewer service area; however, the adoption would not result in an increase in the number of allowed dwelling units. Therefore, implementation of Valley Center Community Plan Residential Policy 8 Revision would not conflict with an applicable HCP or NCCP.

While the Proposed Project would result in an increase in density/intensity of land uses it is not proposing to allow development in areas designated for biological preservation. Conservation within a PAMA is achieved by providing mitigation ratios that favor developing outside the PAMA and conservation/mitigation inside the PAMA; however, the MSCP would not preclude a land owner from developing on PAMA lands. Under the MSCP, some development projects would be exempt from MSCP limitations, while others would need to meet certain criteria as negotiated by the County and the federal and State wildlife agencies for future project approvals. In general, future development projects within the Proposed Project areas would require environmental review and would need to conform to the preset guidelines and criteria in the applicable HCPs and NCCPs. Although draft or adopted PAMA/FCA designations are found within the Analysis Areas listed above, and/or coastal sage scrub is found in many of the Analysis Areas as noted above, regulatory processes are in place to ensure implementation of and conformance with applicable HCPs and NCCPs for future projects within the PSR Analysis Areas. Therefore, impacts associated with conflicts with HCPs and NCCPs would be less than significant.

2.4.4 Cumulative Impacts

The geographic scope for the biological resources cumulative analysis is the San Diego region, including both incorporated and unincorporated areas, and surrounding counties, unless otherwise stated below. Section 1.11 (Cumulative Project Assessment Overview) of this SEIR provides an update of new projects since the adoption of the General Plan that are considered in this cumulative analysis.

2.4.4.1 *Issue 1: Special Status Plant and Wildlife Species*

Cumulative projects located in the San Diego region would have the potential to result in impacts to special status plant and wildlife species, including loss of habitat. Several of the cumulative projects listed in Tables 1-10 to 1-14 of this SEIR are large development projects that are planned within undeveloped areas and would likely result in loss of habitat or edge effects that would significantly impact special status plant and wildlife species. Adjacent jurisdictions, including incorporated cities, adjacent counties, tribal governments, and federal and State-managed lands would be required to comply with applicable federal and/or State regulations that provide protections for special status plant and wildlife species such as the Federal Endangered Species Act, the California Endangered Species Act, and the California NCCP Act. In addition, some projects that affect special status species require approval from the USFWS and the CDFW. If significant impacts occur from particular cumulative projects, then mitigation measures are usually implemented to reduce impacts to the extent feasible. However, without a comprehensive NCCP in place for the long-term protection of special status plant and wildlife species for the entire southern California region, a cumulative loss of habitat supporting special status plant and wildlife species would occur, even after mitigation has been implemented for individual projects. Therefore, **a significant cumulative impact associated with special status plant and wildlife species would occur.**

As discussed in Section 2.4.3.1 above, development associated with the Proposed Project would have the potential to impact special status species and their habitats. The County has adopted an MSCP South County Subarea Plan for the southwestern portion of the County, but is still developing MSCP Plans for North County and East County areas. **Therefore, until the County has adopted the North County and East County Plans, the Proposed Project's contribution, in combination with other cumulative projects, would be cumulatively considerable (Impact BI-5).**

2.4.4.2 *Issue 2: Riparian Habitat and Other Sensitive Natural Communities*

Cumulative projects located in the San Diego region have the potential to result in impacts associated with riparian habitat and other sensitive natural communities through direct and indirect loss or degradation. For example, some of the cumulative projects listed in Tables 1-10 to 1-14 of this SEIR are large development projects in undisturbed areas that could affect riparian habitat. Adjacent jurisdictions, including incorporated cities, adjacent counties, and federal and State-managed lands, would be required to comply with applicable federal and/or State regulations such as the California Lake and Streambed Alteration Program or the California NCCP Act. These programs provide protections for riparian and other sensitive habitats. In addition, many projects that affect riparian or other protected habitat types require approval from the USFWS and the CDFW. If potentially significant impacts would occur from particular cumulative projects, then mitigation measures would be implemented to reduce impacts to the extent

feasible. However, without a comprehensive NCCP in place for the long-term protection of sensitive natural communities for the entire southern California region, a cumulative loss of riparian and other sensitive habitat could occur, even after mitigation has been implemented for individual projects. Therefore, **a significant cumulative impact associated with riparian habitats and other sensitive natural communities could occur.**

As discussed in Section 2.4.3.2 above, development associated with the Proposed Project would have the potential to impact riparian and other sensitive habitats. The County has adopted the MSCP South County Subarea Plan for the southwestern portion of the County, but is still developing MSCP Plans for the North County and East County. **Therefore, until the County has adopted the North County and East County Plans, the Proposed Project's contribution, in combination with other cumulative projects, would be cumulatively considerable (Impact BI-6).**

2.4.4.3 Issue 3: Federally Protected Wetlands

Cumulative projects located in the San Diego region would have the potential to result in a cumulative impact associated with federally protected wetlands. For example, several cumulative projects listed in Tables 1-10 to 1-14 of this SEIR are large development projects in previously undeveloped areas that would have the potential to result in disturbances to federally protected wetlands. Adjacent jurisdictions, including incorporated cities, adjacent counties, tribal lands, and federal and State-managed lands, would be required to comply with applicable federal and/or State regulations such as the Clean Water Act Sections 401 and 404 and Fish and Game Code Section 1600. If potentially significant impacts would occur from particular cumulative projects, then mitigation measures would be implemented to reduce impacts to the extent feasible to meet the no-net-loss standard. Existing regulations would ensure that a significant cumulative impact associated with federally protected wetlands would not occur. Therefore, the Proposed Project would not contribute to a significant cumulative impact.

2.4.4.4 Issue 4: Wildlife Movement Corridors and Nursery Sites

Cumulative projects located in the San Diego region would have the potential to result in a cumulative impact associated with wildlife movement corridors and nursery sites. Adjacent jurisdictions, including incorporated cities, adjacent counties, and federal and State-managed lands would be required to comply with applicable federal and/or State regulations such as the California NCCP Act. If potentially significant impacts would occur from particular cumulative projects, then mitigation measures would be implemented to reduce impacts to the extent feasible. However, without a comprehensive NCCP in place for the long-term protection of wildlife movement corridors and nursery sites for the entire southern California region, a cumulative loss of wildlife movement corridors and nursery sites would occur, even after mitigation has been implemented for individual projects. Therefore, **a significant cumulative impact associated with wildlife movement corridors and nursery sites would occur.**

As discussed in Section 2.4.3.4 above, the Proposed Project would have the potential to impact wildlife movement corridors and nursery sites. The County has adopted an MSCP South County Subarea Plan for the southwestern portion of the County, but is still developing MSCP Plans for the North County and East County. **Therefore, until the County has adopted the North County and East County Plans, the Proposed Project's contribution, in combination with other cumulative projects, would be cumulatively considerable (Impact BI-7).**

2.4.4.5 Issue 5: Local Policies and Ordinances

Cumulative projects under the County's jurisdiction are required to comply with applicable local policies and ordinances, such as the South County MSCP Subarea Plan or the Southern California Coastal Sage Scrub NCCP Process Guidelines, in order for such projects to be approved. For example, some of the cumulative projects in the County listed in Tables 1-10 to 1-14 of this SEIR are subject to local County of San Diego policies and ordinances. However, it cannot be determined with certainty that regional projects in other jurisdictions would conform to applicable local ordinances.

As discussed in 2.4.3.5 above, the Proposed Project would result in less than significant impacts to conflicts with existing regulations. Therefore, the Proposed Project would not contribute to a significant cumulative impact regarding potential conflicts with existing, policies, plans, and guidelines.

2.4.4.6 Issue 6: Habitat Conservation Plans and NCCPs

Cumulative projects under the County's jurisdiction are required to comply with applicable HCPs and NCCPs, including the San Diego MSCP and Southern California Coastal Sage Scrub NCCP. Therefore, potential cumulative impacts associated with conflicts with applicable HCPs and NCCPs would be less than significant.

As discussed in Section 2.4.3.6 above, the Proposed Project would result in less than significant impacts associated with conflicts with HCPs and NCCPs. Therefore, the Proposed Project would not contribute to a significant cumulative impact regarding potential conflicts with applicable HCPs and NCCPs.

2.4.5 Mitigation

2.4.5.1 Issue 1: Special Status Plant and Wildlife Species

Implementation of the Proposed Project would allow land uses and development to occur in areas outside of an adopted regional conservation plan, thereby resulting in direct, indirect, and cumulative impacts to species identified as a candidate, sensitive, or special status species. Implementation of the following adopted General Plan policies and 2011 PEIR mitigation measures would reduce **Impact BI-1** and **Impact BI-5** but **not to a level below significant; therefore, the impacts would remain significant and unavoidable**. An additional mitigation measure has been identified that would reduce impacts but the County has determined this measure as infeasible, as discussed below.

Infeasible Mitigation Measures

The County has determined the following measures to be infeasible; these measures will not be implemented.

- 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. 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.

Because the measure listed above has been found to be infeasible, impacts would remain significant and unavoidable. Chapter 4 (Project Alternatives) provides a discussion of land use alternatives to the Proposed Project that would result in some reduced impacts associated with special status species and their habitats as compared to the Proposed Project.

Adopted 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: Multiple-Resource Preservation Areas. 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.

Adopted 2011 PEIR 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, 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 Habitat Conservation Plans/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 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, BMO, and 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.

2.4.5.2 Issue 2: Riparian Habitat and Other Sensitive Natural Communities

Implementation of the following adopted General Plan policy and 2011 PEIR mitigation measures would reduce direct **Impact BI-2** and **Impact BI-6** but **not to a level below significant; therefore, impacts would remain significant and unavoidable.**

Adopted General Plan Policy

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.

Adopted 2011 PEIR Mitigation Measures

In addition to the 2011 PEIR mitigation measures listed below, mitigation measures Bio-1.1, Bio-1.2, Bio-1.3, Bio-1.4, Bio-1.5, Bio-1.6, and Bio-1.7 listed in Section 2.4.5.1 for Issue 1 would further reduce **Impact BI-2** and **Impact BI-6** but not to a level below significant and are incorporated here by reference.

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 Fish and Game Code Section 1602 Streambed Alteration Agreements from the California Department of Fish and Game 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.

2.4.5.3 Issue 3: Federally Protected Wetlands

Implementation of the following adopted General Plan policies and 2011 PEIR mitigation measures would reduce **Impact BI-3** to a level below significant.

Adopted General Plan Policies

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.

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.

Adopted 2011 PEIR Mitigation Measures

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 in Sections 2.4.5.1 and 2.4.5.2 for Issues 1 and 2 would mitigate impacts to federally protected wetlands to a level below significant and are incorporated here by reference.

2.4.5.4 Issue 4: Wildlife Movement Corridors and Nursery Sites

Implementation of the Proposed Project would allow land uses and development to occur in areas outside of an adopted regional conservation plan, thereby resulting in direct, indirect, and cumulative impacts to corridors, linkages, and nursery sites. Implementation of the following adopted General Plan policies and 2011 PEIR mitigation measures would reduce direct **Impact BI-4** and **Impact BI-7** but **not to a level below significant; therefore, impacts would remain significant and unavoidable.**

Adopted General Plan Policies

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-1.3: 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-1.4: 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.

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-6.7: 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.

Adopted 2011 PEIR Mitigation Measures

Mitigation measures Bio-1.1, Bio-1.2, Bio-1.3, Bio-1.4, Bio-1.5, Bio-1.6, Bio-1.7 and Bio-2.3 listed in Sections 2.4.5.1 and 2.4.5.2 for Issues 1 and 2 would reduce impacts to wildlife corridors and nursery sites and are incorporated here by reference; however, impacts would not be reduced to a level below significant.

2.4.5.5 Issue 5: Local Policies and Ordinances

Impacts associated with conflicts with existing regulations, policies, plans, and guidelines would be less than significant; therefore, mitigation is not required.

2.4.5.6 Issue 6: Habitat Conservation Plans and Natural Community Conservation Plans

Implementation of the Proposed Project would have less than significant direct and cumulative impacts regarding potential conflicts with applicable HCPs or NCCPs, therefore, no mitigation measures are required. Implementation of the following adopted General Plan policies would further support implementation of and conformance with applicable HCPs and NCCPs.

Adopted General Plan Policies

In addition to the adopted General Plan policies listed below, General Plan policies COS-1.1, COS-1.2, COS-1.3, COS-1.4, COS-1.5, LU-6.1, and LU-6.7 listed in Section 2.4.5.4 for Issue 4 are applicable to habitat conservation and natural community conservation plans and are incorporated here by reference.

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

Policy COS-1.8: Multiple-Resource Preservation Areas. 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-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.

2.4.6 Conclusion

The discussion below provides a synopsis of the conclusion reached in each of the above impact analyses, and the level of impact that would occur after adopted General Plan policies and 2011 PEIR mitigation measures are implemented.

2.4.6.1 Issue 1: Special Status Plant and Wildlife Species

Implementation of the Proposed Project would have the potential to directly and indirectly result in the loss of special status species, and would result in a potentially significant direct impact to these resources. Additionally, the Proposed Project would result in a cumulatively considerable contribution to a significant cumulative impact associated with special status species and their habitats. Implementation of the adopted General Plan policies and 2011 PEIR mitigation measures, in addition to compliance with applicable regulations, would reduce Proposed Project impacts. **However, direct and cumulative impacts associated with special status species would not be mitigated to below a level of significance and would remain significant and unavoidable (Impact BI-1 and Impact BI-5).**

2.4.6.2 Issue 2: Riparian Habitat and Other Sensitive Natural Communities

Implementation of the Proposed Project would have the potential to result in direct and indirect impacts to riparian habitat and other sensitive natural communities, and would result in a potentially significant impact to these resources. Additionally, the Proposed Project would result in a cumulatively considerable contribution to a significant cumulative impact associated with riparian habitat and other sensitive natural communities. Implementation of the adopted General Plan policies and 2011 PEIR mitigation measures, in addition to compliance with applicable regulations, would reduce Proposed Project impacts. **However, direct and cumulative impacts associated with riparian habitat and other sensitive natural communities would not be mitigated to below a level of significance and would remain significant and unavoidable (Impact BI-2 and Impact BI-6).**

2.4.6.3 Issue 3: Federally Protected Wetlands

Implementation of the Proposed Project would have the potential to result in a potentially significant direct impact to federally protected wetlands (**Impact BI-3**); however, implementation of the adopted General Plan policies and 2011 PEIR mitigation measures, in addition to compliance with applicable regulations, would mitigate the impact to below a level of significance. Additionally, the Proposed Project would not contribute to a significant cumulative impact.

2.4.6.4 Issue 4: Wildlife Movement Corridors and Nursery Sites

Implementation of the Proposed Project would have the potential to impact wildlife movement corridors and nursery sites. Additionally, the Proposed Project would result in a cumulatively considerable contribution to a significant cumulative impact associated with wildlife movement corridors and nursery sites. The potentially significant direct and cumulative effects on wildlife corridors and nursery sites resulting from implementation of the Proposed Project would be minimized due to compliance with existing regulations and implementation programs (adopted General Plan goals/policies) and mitigation measures identified in Section 2.4.5.4 for Issue 4 of this SEIR. **However, direct and cumulative impacts associated with wildlife corridors and nursery sites would not be mitigated to below a level of significance and would remain significant and unavoidable (Impact BI-4 and Impact BI-7).**

2.4.6.5 Issue 5: Local Policies and Ordinances

Implementation of the Proposed Project would not conflict with local biological resources related policies and ordinances, and would not result in a significant direct impact to existing regulations, policies, plans, and guidelines protecting biological resources. Additionally, the Proposed Project would not contribute to a significant cumulative impact.

2.4.6.6 Issue 6: Habitat Conservation Plans and NCCPs

Implementation of the Proposed Project would not conflict with applicable HCPs and NCCPs as regulatory processes are in place to assure implementation of and conformance with these plans. Additionally, the Proposed Project would not contribute to a significant cumulative impact.

Table 2.4-1 Estimated Riparian Habitat by Habitat Type

Habitat	Total Acres
Alkali Seep	81
Alluvial Fan Scrub	112
Coastal and Valley Freshwater Marsh	5
Disturbed Wetland	1
Freshwater	5
Freshwater Marsh	6
Southern Cottonwood-Willow Riparian Forest	143
Southern Sycamore-Alder Riparian Woodland	91
Southern Coast Live Oak Riparian Forest	55
Southern Riparian Scrub	11
Southern Willow Scrub	36
Total:	546

Note: The acreages provided in this table have been rounded to the nearest whole number.
Source: County 2017

Table 2.4-2 Estimated Vegetation Classification Acreages by CPA/Subregion and PSR Analysis Area/ Former CGSP Subareas

PSR Analysis Area/ Former CGSP Subareas		Habitat Type	Total Acres
Bonsall			
BO18+ & study area	Coast Live Oak Woodland		7
	Diegan Coastal Sage Scrub		83
	Field/Pasture		22
	Non-Native Grassland		66
	Orchards and Vineyards		581
	Row Crops		103
	Southern Cottonwood-Willow Riparian Forest		4
	Southern Mixed Chaparral		25
	Southern Sycamore-Alder Riparian Woodland		5
	Urban/Developed		26
<i>BO18+ & study area subtotal:</i>			921
Former CGSP Subareas (CG1, CG6, CG7, CG8)	Coast Live Oak Woodland		2
	Diegan Coastal Sage Scrub		30
	Non-Native Grassland		9
	Southern Mixed Chaparral		1
	Urban/Developed		3
<i>CG1, CG6, CG7, CG8 subtotal:</i>			45
Subtotal:			966
Crest-Dehesa			
CD14	Chaparral		10
	Diegan Coastal Sage Scrub		85
	Urban/Developed		5
	Valley and Foothill Grassland		<1
Subtotal:			101
Desert			
DS8 & study area	Desert Saltbush Scrub		90
	Eucalyptus Woodland		2
	Row Crops		73
	Sonoran Mixed Woody Scrub		1
	Urban/Developed		3
<i>DS8 & study area subtotal:</i>			169
DS24	Sonoran Creosote Bush Scrub		168
	Sonoran Mixed Woody Scrub		1
	Urban/Developed		<1
<i>DS24 subtotal:</i>			169
Subtotal:			338

Table 2.4-2 Estimated Vegetation Classification Acreages by CPA/Subregion and PSR Analysis Area/ Former CGSP Subareas

PSR Analysis Area/ Former CGSP Subareas		Habitat Type	Total Acres
Fallbrook			
FB2+ & study area	Diegan Coastal Sage Scrub		149
	Freshwater		1
	Non-Native Grassland		36
	Orchards and Vineyards		34
	Row Crops		220
	Southern Coast Live Oak Riparian Forest		6
	Southern Cottonwood-Willow Riparian Forest		5
	Southern Mixed Chaparral		17
	Urban/Developed		23
	<i>FB2+ & study area subtotal:</i>		491
FB17	Coast Live Oak Woodland		5
	Diegan Coastal Sage Scrub		<1
	Freshwater		<1
	Non-Native Grassland		2
	Orchards and Vineyards		84
	Southern Coast Live Oak Riparian Forest		<1
	Southern Cottonwood-Willow Riparian Forest		10
	Southern Willow Scrub		5
	Urban/Developed		1
	<i>FB17 subtotal:</i>		107
FB19+ & study area	Coast Live Oak Woodland		9
	Diegan Coastal Sage Scrub		114
	Freshwater		1
	Non-Native Grassland		4
	Orchards and Vineyards		331
	Southern Cottonwood-Willow Riparian Forest		72
	Southern Mixed Chaparral		40
	Urban/Developed		5
	<i>FB19+ & study area subtotal:</i>		576
FB21+ & study area	Chaparral		<1
	Coastal Sage-Chaparral Transition		65
	Diegan Coastal Sage Scrub		24
	Open Coast Live Oak Woodland		8
	Orchards and Vineyards		337
	Southern Coast Live Oak Riparian Forest		49
	Southern Mixed Chaparral		145
	Southern Riparian Scrub		11
	Southern Sycamore-Alder Riparian Woodland		27
	Urban/Developed		7
	<i>FB21+ & study area subtotal:</i>		673
Subtotal:			1,847

Table 2.4-2 Estimated Vegetation Classification Acreages by CPA/Subregion and PSR Analysis Area/ Former CGSP Subareas

PSR Analysis Area/ Former CGSP Subareas		Habitat Type	Total Acres
Lake Morena / Campo			
ME26 & study area	Chamise Chaparral		38
	Field/Pasture		116
	Granitic Northern Mixed Chaparral		439
	Open Coast Live Oak Woodland		42
	Sagebrush Scrub		17
	Urban/Developed		26
	<i>ME26 & study area subtotal:</i>		678
ME30A	Alkali Seep		81
	Dense Coast Live Oak Woodland		<1
	Field/Pasture		14
	Freshwater Marsh		6
	Granitic Northern Mixed Chaparral		139
	Urban/Developed		21
	<i>ME30A subtotal:</i>		262
Subtotal:			940
North County Metro			
NC3A & study area	Coast Live Oak Woodland		70
	Dense Coast Live Oak Woodland		5
	Diegan Coastal Sage Scrub		201
	Eucalyptus Woodland		<1
	Non-Native Grassland		3
	Open Coast Live Oak Woodland		3
	Orchards and Vineyards		274
	Southern Mixed Chaparral		443
	Urban/Developed		15
	<i>NC3A & study area subtotal:</i>		1,013
NC18A	Diegan Coastal Sage Scrub		13
	Extensive Agriculture - Field/Pasture, Row Crops		3
	Field/Pasture		7
	Orchards and Vineyards		55
	Row Crops		13
	Southern Riparian Scrub		<1
	Urban/Developed		2
	<i>NC18A subtotal:</i>		92
NC22 & study area	Diegan Coastal Sage Scrub		112
	Eucalyptus Woodland		1
	Freshwater		1
	Orchards and Vineyards		22
	Southern Mixed Chaparral		6
	Southern Sycamore-Alder Riparian Woodland		10
	Urban/Developed		3
<i>NC22 & study area subtotal:</i>			154

Table 2.4-2 Estimated Vegetation Classification Acreages by CPA/Subregion and PSR Analysis Area/ Former CGSP Subareas

PSR Analysis Area/ Former CGSP Subareas		Habitat Type	Total Acres
NC37 & study area	Diegan Coastal Sage Scrub		28
	Field/Pasture		49
	Intensive Agriculture - Dairies, Nurseries, Chicken Ranches		6
	Non-Native Grassland		3
	Orchards and Vineyards		11
	Row Crops		8
	Southern Mixed Chaparral		54
	Urban/Developed		1
	NC37 & study area subtotal:		158
NC38+	Coast Live Oak Woodland		1
	Field/Pasture		5
	Orchards and Vineyards		4
	Row Crops		59
	Southern Sycamore-Alder Riparian Woodland		3
	Urban/Developed		5
	NC38+ subtotal:		77
Former CGSP Subarea (CG5 and the portion of CG4 that is in North County Metro)	Coast Live Oak Woodland		4
	Diegan Coastal Sage Scrub		16
	Non-Native Grassland		3
	Orchards and Vineyards		<1
	Southern Mixed Chaparral		14
	Southern Willow Scrub		3
	Urban/Developed		9
	CG5 subtotal:		49
Subtotal:		1,544	
Pala-Pauma			
PP30	Alluvial Fan Scrub		112
	Coast Live Oak Woodland		32
	Coastal Sage-Chaparral Transition		60
	Diegan Coastal Sage Scrub		67
	Field/Pasture		<1
	Montane Buckwheat Scrub		23
	Non-Native Grassland		9
	Open Coast Live Oak Woodland		31
	Orchards and Vineyards		100
	Row Crops		24
	Southern Mixed Chaparral		15
	Southern Sycamore-Alder Riparian Woodland		40
	Urban/Developed		1
	Valley and Foothill Grassland		1
	Subtotal:		514

Table 2.4-2 Estimated Vegetation Classification Acreages by CPA/Subregion and PSR Analysis Area/ Former CGSP Subareas

PSR Analysis Area/ Former CGSP Subareas		Habitat Type	Total Acres
San Dieguito			
SD15	Diegan Coastal Sage Scrub		8
	Disturbed Habitat		<1
	Eucalyptus Woodland		<1
	Orchards and Vineyards		<1
	Southern Mixed Chaparral		33
	Urban/Developed		27
Subtotal:			69
Valley Center			
VC7+ & study area	Coast Live Oak Woodland		8
	Diegan Coastal Sage Scrub		68
	Disturbed Habitat		2
	Field/Pasture		88
	Intensive Agriculture - Dairies, Nurseries, Chicken Ranches		25
	Non-Native Grassland		169
	Orchards and Vineyards		758
	Row Crops		160
	Southern Cottonwood-Willow Riparian Forest		34
	Southern Mixed Chaparral		99
	Southern Sycamore-Alder Riparian Woodland		7
	Southern Willow Scrub		15
	Urban/Developed		34
	<i>VC7+ & study area subtotal:</i>		<i>1,465</i>
VC51 & study area	Coast Live Oak Woodland		11
	Diegan Coastal Sage Scrub		6
	Non-Native Grassland		5
	Orchards and Vineyards		121
	Southern Cottonwood-Willow Riparian Forest		1
	Southern Mixed Chaparral		22
	<i>VC51 & study area subtotal:</i>		<i>166</i>
VC57+ & study area	Coast Live Oak Woodland		19
	Coastal and Valley Freshwater Marsh		5
	Diegan Coastal Sage Scrub		9
	Disturbed Habitat		19
	Disturbed Wetland		1
	Field/Pasture		368
	Freshwater		3
	Intensive Agriculture - Dairies, Nurseries, Chicken Ranches		44
	Non-Native Grassland		111
	Non-Native Grassland: Broadleaf-Dominated		1
	Orchards and Vineyards		464
	Row Crops		96
	Southern Cottonwood-Willow Riparian Forest		18

Table 2.4-2 Estimated Vegetation Classification Acreages by CPA/Subregion and PSR Analysis Area/ Former CGSP Subareas

PSR Analysis Area/ Former CGSP Subareas	Habitat Type	Total Acres
<i>VC57+ & study area cont.</i>	Southern Mixed Chaparral	13
	Southern Willow Scrub	13
	Urban/Developed	150
	Valley and Foothill Grassland	2
	<i>VC57+ & study area subtotal:</i>	<i>1,335</i>
<i>VC67 & study area</i>	Dense Engelmann Oak Woodland	2
	Field/Pasture	7
	Orchards and Vineyards	<1
	Southern Willow Scrub	1
	Urban/Developed	4
	<i>VC67 & study area subtotal:</i>	<i>13</i>
Former CGSP Subareas (CG2, CG3, and the portion of CG4 that is in Valley Center)	Coast Live Oak Woodland	1
	Diegan Coastal Sage Scrub	3
	Intensive Agriculture - Dairies, Nurseries, Chicken Ranches	11
	Non-Native Grassland	8
	Orchards and Vineyards	1
	Southern Mixed Chaparral	1
	Southern Willow Scrub	<1
	<i>CG2, CG3, and CG4 subtotal</i>	<i>27</i>
Subtotal:		3,006
Total:		9,325

Note: The vegetation acreages provided in this table have been rounded to the nearest whole number; which has resulted in the subtotals and totals of these acreages to differ from the total project area identified in the project description.

Source: County 2017

Table 2.4-3 Estimated Total Acreages by Vegetation Classification

Habitat Type	Total Acres
Orchards and Vineyards	3,177
Diegan Coastal Sage Scrub	1,016
Southern Mixed Chaparral	927
Row Crops	755
Field/Pasture	675
Granitic Northern Mixed Chaparral	578
Non-Native Grassland	428
Urban/Developed	371
Coast Live Oak Woodland	170
Sonoran Creosote Bush Scrub	168
Southern Cottonwood-Willow Riparian Forest	143
Coastal Sage-Chaparral Transition	124
Alluvial Fan Scrub	112
Southern Sycamore-Alder Riparian Woodland	91
Desert Saltbush Scrub	90
Intensive Agriculture - Dairies, Nurseries, Chicken Ranches	87
Open Coast Live Oak Woodland	84
Alkali Seep	81
Southern Coast Live Oak Riparian Forest	55
Chamise Chaparral	38
Southern Willow Scrub	36
Montane Buckwheat Scrub	23
Disturbed Habitat	21
Sagebrush Scrub	17
Southern Riparian Scrub	11
Other Chaparral	11
Freshwater Marsh	6
Freshwater	5
Dense Coast Live Oak Woodland	5
Coastal and Valley Freshwater Marsh	5
Extensive Agriculture - Field/Pasture, Row Crops	3
Valley and Foothill Grassland	3
Sonoran Mixed Woody Scrub	3
Eucalyptus Woodland	2
Dense Engelmann Oak Woodland	2
Non-Native Grassland: Broadleaf-Dominated	1
Disturbed Wetland	1
Total:	9,325

Note: The vegetation acreages provided in this table have been rounded to the nearest whole number; which has resulted in the subtotals and totals of these acreages to differ from the total project area identified in the project description.

Source: County 2017

Table 2.4-4 Estimated Acreage Potentially Supporting Special Status Species by CPA/Subregion

CPA/Subregion and Special Status Species	Status ⁽¹⁾	Acreage
Bonsall		
Coastal California gnatcatcher	FT/SSC/ County Group 1	203
Summer holly	CRPR: 1B.2/ County List A	97
Crest-Dehesa		
Coastal California gnatcatcher	FT/SSC/ County Group 1	102
Orange-throated whiptail	WL/ County Group 2	47
Southern California rufous-crowned sparrow	WL/ County Group 1	92
Desert		
Blainville's horned lizard	BLMS/SSC/ County Group 2	176
Gravel milk-vetch	CRPR: 2B.2	176
Palmer's jackass clover	CRPR: 2B.2	318
Peirson's pincushion	CRPR: 1B.3/ County List A	176
Fallbrook		
Arroyo toad	FE/SSC/ County Group 1	152
Coastal California gnatcatcher	FT/SSC/ County Group 1	570
Dulzura pocket mouse	SSC/ County Group 2	29
Least Bell's vireo	Nesting: FE/SE/SSC/ County Group 1	16
Orange-throated whiptail	WL/ County Group 2	79
Orcutt's pincushion	CRPR: 1B.1/ County List A	29
Rainbow manzanita	CRPR: 1B.1/ County List A	1
Rosy boa	County Group 2	29
Southwestern willow flycatcher	FE/SE	<1
Tricolored blackbird	Nesting: BCC; BLMS/SCE/SSC/ County Group 1	31
Mountain Empire		
Jacumba milk-vetch	CRPR: 1B.1/ County List A	8
Orange-throated whiptail	WL/ County Group 2	262
Quino checkerspot butterfly	FE	7
Robinson's pepper-grass	CRPR: 4.3/ County List A	13
San Diego sunflower	CRPR: 1B.3/ County List A	13
Southern jewelflower	CRPR: 1B.3/ County List A	13
Tricolored blackbird	Nesting: BCC; BLMS/SCE/SSC/ County Group 1	61
North County Metro		
American badger	SSC/ County Group 2	678
Coastal California gnatcatcher	FT/SSC/ County Group 1	382
Felt-leaved monardella	CRPR: 1B.2/ County List A	3
Orange-throated whiptail	WL/ County Group 2	1,020
Ramona horkelia	CRPR: 1B.3/ County List A	5
Robinson's pepper-grass	CRPR: 4.3/ County List A	<1
Southern California rufous-crowned sparrow	WL/ County Group 1	342
Summer holly	CRPR: 1B.2/ County List A	1,041
Tricolored blackbird	Nesting: BCC; BLMS/SCE/SSC/ County Group 1	92

Table 2.4-4 Estimated Acreage Potentially Supporting Special Status Species by CPA/Subregion

CPA/Subregion and Special Status Species	Status ⁽¹⁾	Acreage
Pala-Pauma		
Arroyo toad	FE/SSC/ County Group 1	382
Blainville's horned lizard	BLMS/SSC/ County Group 2	403
Orange-throated whiptail	WL/ County Group 2	403
Southwestern willow flycatcher	FE/SE	142
Western pond turtle	BLMS /SSC/ County Group 1	509
San Dieguito		
Coastal California gnatcatcher	FT/SSC/ County Group 1	70
Orcutt's brodiaea	CRPR: 1B.1/ County List A	<1
San Diego goldenstar	CRPR: 1B.1/ County List A	1
Valley Center		
Coastal California gnatcatcher	FT/SSC/ County Group 1	152
Blainville's horned lizard	BLMS/SSC/ County Group 2	21
Robinson's pepper-grass	CRPR: 4.3/ County List A	5
Former Champagne Gardens Specific Plan Areas		
Coastal California gnatcatcher	FT/SSC/ County Group 1	112

⁽¹⁾ **Federal Status (listed under the Endangered Species Act)** – FE = Federally Endangered; FT = Federally Threatened; FC = Candidate for federal listing; FD = Delisted; FPE = Federally proposed for listing as Endangered; FPT = Federally proposed for listing as Threatened; FPD = Federally proposed for delisting; BLMS = Sensitive (Bureau of Land Management); BCC = Bird of Conservation Concern (USFWS)

State Status (listed under California Endangered Species Act) – SE = State Endangered; ST = State Threatened; SCE = State candidate for listing as Endangered; SCT = State candidate for listing as Threatened; SCD = State candidate for delisting; SFP = State Fully Protected; SSC = State Species of Special Concern; WL = State Watch List

CRPR (California Rare Plant Ranks, formerly known as CNPS lists) – 1A = Plants Presumed Extirpated in California and Either Rare or Extinct Elsewhere; 1B = Plants Rare, Threatened, or Endangered in California and Elsewhere; 2A = Plants Presumed Extirpated in California, But Common Elsewhere; 2B = Plants Rare, Threatened, or Endangered in California, But More Common Elsewhere; 3 = Plants in need of more information; 4 = Plants of limited distribution. x.1 = Seriously threatened in California (>80% of occurrences threatened or high degree and immediacy of threat). x.2 = Moderately threatened in California (20-80% of occurrences threatened or moderate degree and immediacy of threat). x.3 = Not very endangered in California (<20% of occurrences threatened or low degree and immediacy of threat or no current threats known)

Note: The acreages provided in this table have been rounded to the nearest whole number.

Sources: CDFW 2016; SANDAG 2016; USFWS 2016b; County 2017

Table 2.4-5 Estimated Riparian Habitat by CPA/Subregion

CPA/Subregion	Total Acres
Bonsall	9
Fallbrook	187
Mountain Empire	87
North County Metro	18
Pala-Pauma	152
Valley Center	99
Total:	552

Note: The acreages provided in this table have been rounded to the nearest whole number.
Source: County 2017

Table 2.4-6 Estimated Federally Protected Wetlands Within the PSR Analysis Areas/Former CGSP Area

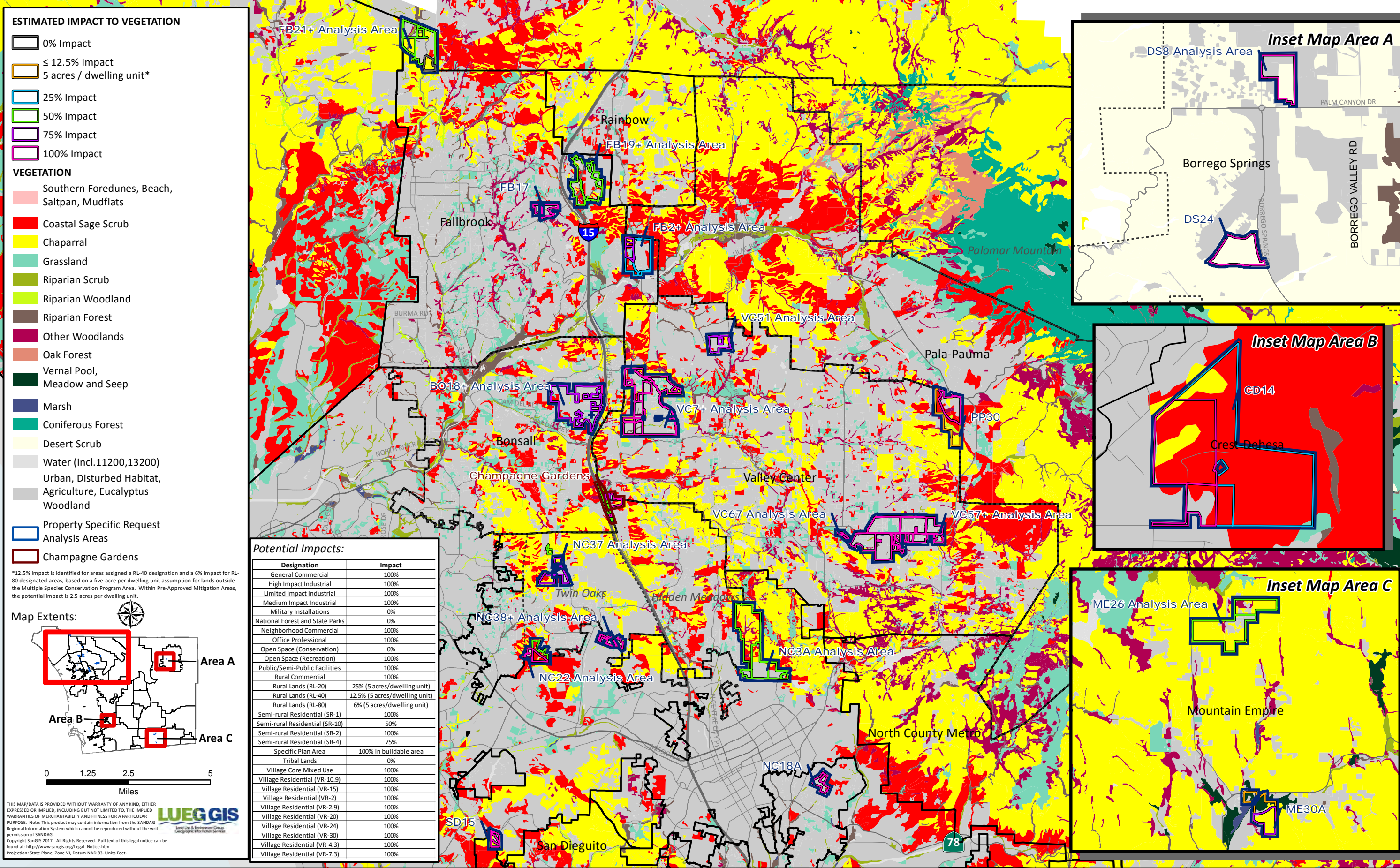
PSR Analysis Area/ Former CGSP Subarea	Habitat	Total Acres
Bonsall		
BO18+ & study area	61330 Southern Cottonwood-Willow Riparian Forest	4
	62400 Southern Sycamore-Alder Riparian Woodland	5
Subtotal:		8
Fallbrook		
FB2+ & study area	61310 Southern Coast Live Oak Riparian Forest	6
	61330 Southern Cottonwood-Willow Riparian Forest	5
	64140 Freshwater	1
	<i>FB2+ & study area subtotal:</i>	<i>12</i>
FB17	61310 Southern Coast Live Oak Riparian Forest	<1
	61330 Southern Cottonwood-Willow Riparian Forest	10
	63320 Southern Willow Scrub	5
	64140 Freshwater	<1
<i>FB17 subtotal:</i>		<i>15</i>
FB19+ & study area	61330 Southern Cottonwood-Willow Riparian Forest	72
	64140 Freshwater	1
<i>FB19+ & study area subtotal:</i>		<i>73</i>
FB21+ & study area	61310 Southern Coast Live Oak Riparian Forest	49
	62400 Southern Sycamore-Alder Riparian Woodland	27
	63300 Southern Riparian Scrub	11
	<i>FB21+ & study area subtotal:</i>	<i>87</i>
Subtotal:		187
Mountain Empire		
ME30A	45320 Alkali Seep	81
	52400 Freshwater Marsh	6
Subtotal:		87
North County Metro		
NC18A	63300 Southern Riparian Scrub	<1
	<i>NC18A subtotal:</i>	<i><1</i>
NC22 & study area	62400 Southern Sycamore-Alder Riparian Woodland	10
	64140 Freshwater	1
	<i>NC22 & study area subtotal:</i>	<i>11</i>
NC38+	62400 Southern Sycamore-Alder Riparian Woodland	3
	<i>NC38+ subtotal:</i>	<i>3</i>
Former CGSP Subareas CG5 and the portion of CG4 within North County Metro	63320 Southern Willow Scrub	3
<i>CG5 subtotal:</i>		<i>3</i>
Subtotal:		17
Pala-Pauma		
PP30	62400 Southern Sycamore-Alder Riparian Woodland	40
	32720 Alluvial Fan Scrub	112
Subtotal:		152

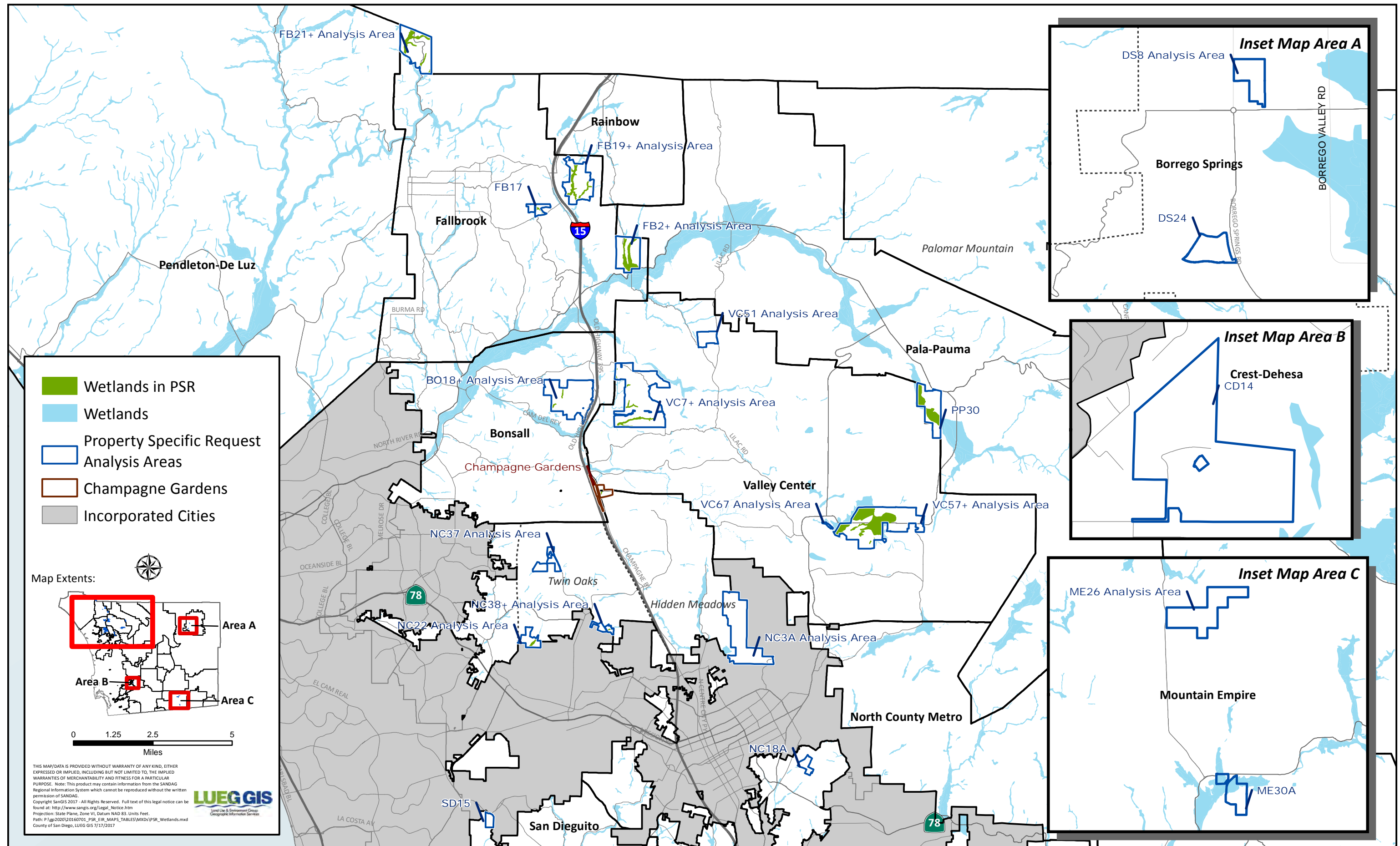
Table 2.4-6 Estimated Federally Protected Wetlands Within the PSR Analysis Areas/Former CGSP Area

PSR Analysis Area/ Former CGSP Subarea	Habitat	Total Acres
Valley Center		
VC7+ & study area	61330 Southern Cottonwood-Willow Riparian Forest	34
	62400 Southern Sycamore-Alder Riparian Woodland	7
	63320 Southern Willow Scrub	15
	<i>VC7+ & study area subtotal:</i>	<i>56</i>
VC51 & study area	61330 Southern Cottonwood-Willow Riparian Forest	1
	<i>VC51 & study area subtotal:</i>	<i>1</i>
VC57+ & study area	11200 Disturbed Wetland	1
	52410 Coastal and Valley Freshwater Marsh	5
	61330 Southern Cottonwood-Willow Riparian Forest	18
	63320 Southern Willow Scrub	13
	64140 Freshwater	3
	<i>VC57+ & study area subtotal:</i>	<i>39</i>
VC67 & study area	63320 Southern Willow Scrub	1
	<i>VC67 & study area subtotal:</i>	<i>1</i>
Former CGSP Subareas CG2, CG3, and the portion of CG4 within Valley Center	63320 Southern Willow Scrub	<1
	<i>CG2, CG3, CG4 Subarea subtotal:</i>	<i><1</i>
Subtotal:		96
Total:		548

Note: The acreages provided in this table have been rounded to the nearest whole number.
Source: County 2017

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Source: SanGIS, County of San Diego, 2017

Wetlands

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