2.4 Biological Resources

This section of the Supplemental Environmental Impact Report (SEIR) describes the biological resources within the Alpine Community Plan Area (CPA) and evaluates the potential impacts from the proposed project on special-status plant and wildlife species, riparian habitat and other sensitive natural communities, federally protected wetlands, wildlife movement corridors and nursery sites, local policies and ordinances, and habitat conservation plans (HCPs). This section incorporates information and analysis from the 2011 General Plan EIR and 2016 Forest Conservation Initiative (FCI) General Plan Amendment (GPA) EIR (FCI EIR) (referred to throughout the rest of this section as "prior EIRs") as they apply to the proposed project. Section 1.3, *Project Background*. of this SEIR provides a background for both EIRs. The 2011 General Plan EIR analyzed the entirety of the Alpine CPA while the FCI EIR provided an updated analysis of impacts of land use changes within the FCI lands. These prior EIRs both have similar significance statements related to biological resources. Table 2.4-1 summarizes the impact conclusions identified in this section.

This section is based on California Environmental Quality Act (CEQA) Guidelines Appendix G and the County of San Diego Guidelines for Determining Significance for Biological Resources (County of San Diego 2010). This section also describes the potential impacts from the proposed project and the changes in density and intensity allowed compared to the County's General Plan, that in turn could impact special-status species, riparian habitat, wetlands, wildfire corridors and nursery sites, adopted policies and ordinances, and HCPs.

Table 2.4-1 summarizes the impact conclusions identified in this section.

Comments received during the Notice of Preparation (NOP) scoping process included concerns regarding potential impacts on the draft East County Multiple Species Conservation Program and Pre-approved Mitigation Areas (PAMAs); wetlands and riparian habitat; listed and other sensitive plant and wildlife species, including nesting birds; effects of lighting, noise, human activity, exotic species, and drainage; wildlife corridor and movement areas; conflicts between human and wildlife interface; habitat degradation, loss, and fragmentation; effects on Critical Biological Areas of the Cleveland National Forest (CNF); and effects on ecosystem services such as filtration of runoff. These concerns are addressed and summarized in this section.

A copy of the NOP and comment letters received in response to the NOP are included in Appendix A of this SEIR. This section incorporates information and analyses from the prior EIRs as applicable to the Alpine CPU (proposed project).

2.4.1 Existing Conditions

The Alpine CPA is located within San Diego County's mountainous Peninsular Range, situated in the foothills of the Cuyamaca Mountains. The area is rugged and diverse, ranging from densely vegetated drainages and riparian areas to semi-arid hilly terrain, to the peaks of Viejas Mountain and El Cajon Mountain. Elevation within the Alpine CPA ranges from 1,500 feet above mean sea level (amsl) to 4,100 feet amsl. The prior EIRs included a discussion of existing conditions related to biological resources in Sections 2.4.1 of Chapter 2. This section incorporates information from the prior EIRs related to the existing conditions in the Alpine CPA. Minor changes in the existing land use and vegetation community composition are summarized below and an updated list of potentially occurring special-status species is also provided to reflect potential changes regarding the species that may be affected by the proposed project.

Table 2.4-1: Biological Resources Summary of Impacts

Issue Number	Issue Topic	Prior EIRs Conclusion	Project Direct Impact	Project Cumulative Impact	Level of Significance After Mitigation
BIO-1	Special-Status Plant and Wildlife Species	Significant and Unavoidable	Potentially Significant	Potentially Significant	Significant and Unavoidable
BIO-2	Riparian Habitat and Other Sensitive Natural Communities	Significant and Unavoidable	Potentially Significant	Potentially Significant	Significant and Unavoidable
BIO-3	Federally Protected Wetlands	Less than Significant	Potentially Significant	Less than Significant	Less than Significant
BIO-4	Wildlife Movement Corridors and Nursery Sites	Significant and Unavoidable	Potentially Significant	Potentially Significant	Significant and Unavoidable
BIO-5	Local Policies and Ordinances	Less than Significant	Less than Significant	Less than Significant	Less than Significant
BIO-6	Habitat Conservation Plans	Less than Significant	Less than Significant	Less than Significant	Less than Significant

The specific vegetation communities existing within each subarea are detailed in Section 2.4.3.1.

2.4.1.1 Vegetation Communities

The prior EIRs provided a discussion of 20 aggregated vegetation types that occur within the San Diego region based on vegetation community classifications consistent with Oberbauer (2005). Of those 20 vegetation types, nine occur within the Alpine CPA:

- Chaparral
- Coastal Sage Scrub
- Grasslands
- Marshes
- Meadows and Seeps (includes Vernal Pools)
- Other Woodlands
- Riparian Vegetation
- Water
- Urban Disturbed Habitat, Agriculture, Eucalyptus Woodland.

Descriptions of these nine vegetation communities are generally unchanged from those analyzed under the prior EIRs.

Based on a review of full-color aerial imagery (SANDAG 2017a), the land use patterns and existing vegetation communities from the San Diego Association of Governments (SANDAG) geographic

information system (GIS) layer (SANDAG 2017b) were updated to reflect development that has occurred since certification of the prior EIRs. Some previously native vegetation has been converted to developed areas within the Alpine CPA. Table 2.4-2 below provides acreages of each vegetation type in the Alpine CPA, while Table 2.4-3 provides vegetation acreages within each of the seven subareas. Figures 2.4-1a and 2.4-1b identify the updated aggregated vegetation types and land cover within the seven subareas.

Table 2.4-2: Existing Aggregated Vegetation Types within the Alpine Community Plan Area

Vegetation Community	Area within Alpine CPA (acres)
Chaparral	48,069
Coastal Sage Scrub	3,537
Grassland	1,360
Marsh	1
Meadows and Seeps	44
Other Woodlands	3,153
Riparian Vegetation	2,251
Water	1,241
Disturbed, Urban, Agriculture, Eucalyptus Woodland	8,470
Total	**68,124[1]**

[1] It should be noted that the acreages are approximate due to various limitations and rounding.

Table 2.4-3: Existing Aggregated Vegetation Types within Subareas

Land Use/ Vegetation Community	Approximate Acreage within Subarea							Total within Subareas (acres)
	1	2	3	4	5	6	7	
Chaparral	30.66	14.03	51.75	168.41	1,561.07	1.44	8,139.67	9,967.03
Coastal Sage Scrub	2.82	10.50	0.00	98.91	0.00	0.00	132.99	245.22
Disturbed, Urban, Agriculture, Eucalyptus Woodland	24.23	107.56	39.03	282.76	353.98	83.45	1,668.60	2,559.61
Grassland	0.00	8.91	4.74	93.92	0.00	6.47	66.17	180.21
Marsh	0.00	0.00	0.00	0.00	0.00	0.00	0.97	0.97
Other Woodlands	0.00	0.00	14.73	0.00	53.66	1.37	1,704.84	1,774.60
Riparian Vegetation	0.00	1.61	3.97	8.10	111.81	12.21	346.08	483.78

2.4.1.2 Sensitive Resources

Sensitive resources are defined in the prior EIRs as the following: (1) vegetation communities that are unique, of relatively limited distribution, or of particular value to wildlife; and (2) species that have been given special-status by federal or state agencies, or are included in regional conservation plans due to limited, declining, or threatened populations. Special-status plant and wildlife species are recognized by

the County, US Fish and Wildlife Service (USFWS federal), California Department of Fish and Wildlife (CDFW state), and the California Native Plant Society (CNPS).

Critical habitat is a term defined and used in the federal Endangered Species Act (ESA) for federally listed plant and wildlife species. Land development activities that involve a federal permit, license, or funding, and are likely to destroy or adversely modify critical habitat require consultation with USFWS. Critical habitat is the habitat essential to the conservation of an endangered or threatened species and may include areas that are not currently occupied by the species but will be needed for its recovery. Critical habitat is designated for three federally listed species (chaparral, San Diego thornmint, and Mexican flannelbush) that occur or have the potential to occur in or in the vicinity of the Alpine CPA (Figures 2.4-2a and 2.4-2b).

Special-Status Plants

Sixty-two special-status plant species occur or have the potential to occur within the Alpine CPA based on updated information from the California Natural Diversity Database (CNDDB) (CDFW 2019a) (Table 2.4-4); one species is federally endangered, two species are threatened, and there are no federal candidates for listing within the Alpine CPA. Additionally, three species are listed by the state as endangered and four are listed as rare. There are no species listed as state threatened or candidates for listing within the Alpine CPA. Under the County's designations, 41 are County List A, eight are List B, one is List C, and three are List D. These special-status plant species are identified in Table 2.4-4 below.

Table 2.4-4. Special-Status Plant Species with Potential to Occur within the Alpine Community Plan Area

Common Name	Scientific Name	Federal Status[1]	State Status[2]	CNPS Rank[3]	Habitat Associations
County List A[4]					
Peninsular navarretia	*Navarretia peninsularis*	None	None	1B.2	Mesic. Chaparral (openings), lower montane coniferous forest, meadows and seeps, pinyon and juniper woodland.
Campo clarkia	*Clarkia delicata*	None	None	1B.2	Cismontane woodland, chaparral.
chaparral beargrass	*Nolina cismontane*	None	None	1B.2	Chaparral, coastal scrub.
Cuyamaca larkspur	*Delphinium hesperium* ssp. *cuyamacae*	None	SR	1B.2	Lower montane coniferous forest, meadows.
Dean's milk-vetch	*Astragalus deanei*	None	None	1B.1	Chaparral, coastal scrub, riparian forest.
decumbent goldenbush	*Isocoma menziesii* var. *decumbens*	None	None	1B.2	Chaparral, coastal scrub (sandy, often in disturbed areas).
Dehesa beargrass	*Nolina interrata*	None	SE	1B.1	Chaparral.
Dunn's mariposa-lily	*Calochortus dunnii*	None	SR	1B.2	Closed-cone coniferous forest, chaparral.

Common Name	Scientific Name	Federal Status[1]	State Status[2]	CNPS Rank[3]	Habitat Associations
Encinitas baccharis	*Baccharis vanessae*	FT	SE	1B.1	Chaparral.
felt-leaved monardella	*Monardella hypoleuca* ssp. *lanata*	None	None	1B.2	Chaparral, cismontane woodland.
Gander's pitcher sage	*Lepechinia gander*	None	None	1B.3	Gabbroic or meta-volcanic. Closed-cone coniferous forest, chaparral, coastal scrub, valley and foothill grassland.
Gander's ragwort	*Packera ganderi*	None	SR	1B.2	Chaparral.
Hammitt's clay-cress	*Sibaropsis hammittii*	None	None	1B.2	Valley and foothill grassland, chaparral.
Jacumba milk-vetch	*Astragalus douglasii* var. *perstrictus*	None	None	1B.2	Rocky. Chaparral, cismontane woodland, pinyon and juniper woodland, riparian scrub, valley and foothill grassland.
Laguna Mountains alumroot	*Heuchera brevistaminea*	None	None	1B.3	Broadleaved upland forest, chaparral, cismontane woodland, riparian forest.
Laguna Mountains goldenbush	*Ericameria cuneata* var. *macrocephala*	None	None	1B.3	Chaparral (granitic).
Lakeside ceanothus	*Ceanothus cyaneus*	None	None	1B.2	Closed-cone coniferous forest, chaparral.
lemon lily	*Lilium parryi*	None	None	1B.2	Mesic. Lower montane coniferous forest, meadows and seeps, riparian forest, upper montane coniferous forest.
long-spined spineflower	*Chorizanthe polygonoides* var. *longispina*	None	None	1B.2	Chaparral, coastal scrub, meadows, valley and foothill grassland.
Mexican flannelbush	*Fremontodendron mexicanum*	FE	SR	1B.1	Closed-cone coniferous forest, chaparral, cismontane woodland.
Morena currant	*Ribes canthariforme*	None	None	1B.3	Chaparral.
Nuttall's scrub oak	*Quercus dumosa*	None	None	1B.1	Sandy, clay loam. Closed-cone coniferous forest, chaparral, coastal scrub.
Orcutt's brodiaea	*Brodiaea orcuttii*	None	None	1B.1	Vernal pools, valley and foothill grasslands, closed-cone coniferous forest, cismontane woodland, chaparral, meadows.

Common Name	Scientific Name	Federal Status[1]	State Status[2]	CNPS Rank[3]	Habitat Associations
Orcutt's linanthus	*Linanthus orcuttii*	None	None	1B.3	Chaparral, lower montane coniferous forest.
Otay manzanita	*Arctostaphylos otayensis*	None	None	1B.2	Chaparral, cismontane woodland.
Parish's chaenactis	*Chaenactis parishii*	None	None	1B.3	Chaparral.
Parry's tetracoccus	*Tetracoccus dioicus*	None	None	1B.2	Chaparral, coastal scrub.
Ramona horkelia	*Horkelia truncata*	None	None	1B.3	Chaparral, cismontane woodland.
Robinson's pepper-grass	*Lepidium virionic* var. *robinsonii*	None	None	4.3	Chaparral, coastal scrub.
San Diego goldenstar	*Bloomeria clevelandii*	None	None	1B.1	Chaparral, coastal scrub, valley and foothill grassland, vernal pools.
San Diego milk-vetch	*Astragalus oocarpus*	None	None	1B.2	Chaparral, cismontane woodland, meadows.
San Diego sunflower	*Hulsea californica*	None	None	1B.3	Lower montane coniferous forest, upper montane coniferous forest, chaparral.
San Diego thorn-mint	*Acanthomintha ilicifolia*	FT	SE	1B.1	Chaparral, coastal scrub, valley and foothill grassland, vernal pools.
San Miguel savory	*Clinopodium chandleri*	None	None	1B.2	Chaparral, cismontane woodland, coastal scrub, riparian woodland, valley and foothill grassland.
snake cholla	*Cylindropuntia californica* var. *californica*	None	None	1B.1	Chaparral, coastal scrub.
southern jewelflower	*Streptanthus campestris*	None	None	1B.3	Chaparral, lower montane coniferous forest, pinyon and juniper woodland.
southern mountains skullcap	*Scutellaria bolanderi* ssp. *austromontana*	None	None	1B.2	Chaparral, cismontane woodland, lower montane coniferous forest.
Tecate cypress	*Hesperocyparis forbesii*	None	None	1B.1	Closed-cone coniferous forest, chaparral.
Tecate tarplant	*Deinandra floribunda*	None	None	1B.2	Chaparral, coastal scrub.
variegated dudleya	*Dudleya variegata*	None	None	1B.2	Chaparral, coastal scrub, cismontane, valley and foothill grassland, vernal pools.
velvety false lupine	*Thermopsis californica* var.	None	None	1B.2	Lower montane coniferous forest, meadows and seeps,

Common Name	Scientific Name	Federal Status[1]	State Status[2]	CNPS Rank[3]	Habitat Associations
	semota				cismontane woodland, valley and foothill grassland.
County List B[4]					
Cedros Island oak	*Quercus cedrosensis*	None	None	2B.2	Closed-cone coniferous forest, chaparral, coastal scrub.
Cove's cassia	*Senna covesii*	None	None	2B.2	Dry, sandy desert washes and slopes. Sonoran desert scrub.
Cuyamaca cypress	*Hesperocyparis stephensonii*	None	None	1B.1	Closed-cone coniferous forest, chaparral, riparian forest.
Munz's sage	*Salvia munzii*	None	None	2B.2	Chaparral, coastal scrub.
Palmer's goldenbush	*Ericameria palmeri* var. *palmeri*	None	None	1B.1	Coastal scrub, chaparral.
San Diego County alumroot	*Heuchera rubescens* var. *versicolor*	None	None	3.3	Chaparral, lower montane coniferous forest.
San Diego marsh-elder	*Iva hayesiana*	None	None	2B.2	Marshes and swamps, playas.
sticky geraea	*Geraea viscida*	None	None	2B.2	Chaparral.
County List C[4]					
Mission Canyon bluecup	*Githopsis diffusa* ssp. *filicaulis*	None	None	3.1	Chaparral.
County List D[4]					
Laguna Mountains jewelflower	*Streptanthus bernardinus*	None	None	4.3	Chaparral, lower montane coniferous forest.
Palmer's grapplinghook	*Harpagonella palmeri*	None	None	4.2	Clay, open grassy areas within shrubland. Chaparral, coastal scrub, valley and foothill grassland.
San Diego sagewort	*Artemisia palmeri*	None	None	4.2	Sandy, mesic. Chaparral, coastal scrub, riparian forest, riparian scrub, riparian woodland.
Not on County List					
Abrams' spurge	*Euphorbia abramsiana*	None	None	2B.2	Sandy. Mojavean desert scrub, Sonoran desert scrub.
chaparral ash	*Fraxinus parryi*	None	None	2B.2	Chaparral.
prairie wedge grass	*Sphenopholis obtusata*	None	None	2B.2	Mesic. Cismontane woodland, meadows and seeps.
San Bernardino aster	*Symphyotrichum defoliatum*	None	None	1B.2	Meadows and seeps, marshes and swamps, coastal scrub, cismontane woodland, lower

Common Name	Scientific Name	Federal Status[1]	State Status[2]	CNPS Rank[3]	Habitat Associations
					montane coniferous forest, grassland.
San Diego gumplant	*Grindelia hallii*	None	None	1B.2	Meadows, valley and foothill grassland, chaparral, lower montane coniferous forest.
San Luis Obispo sedge	*Carex obispoensis*	None	None	1B.2	Often serpentinite seeps, sometimes gabbro; often on clay soils. Closed-cone coniferous forest, chaparral, coastal prairie, coastal scrub, valley and scrub grassland.
singlewhorl burrobrush	*Ambrosia monogyra*	None	None	2B.2	Chaparral, Sonoran desert scrub.
vanishing wild buckwheat	*Eriogonum evanidum*	None	None	1B.1	Chaparral, lower montane coniferous forest, pinyon and juniper woodland.
white rabbit-tobacco	*Pseudognaphalium leucocephalum*	None	None	2B.2	Sandy, gravelly. Chaparral, cismontane woodland, coastal scrub, riparian woodland.

Sensitivity Status:

[1]**Federal**: Federal Endangered Species Act (ESA) Threatened or Endangered

FE – listed as endangered under the federal Endangered Species Act.

FT – listed as threatened under the federal Endangered Species Act.

[2]**State**: California Endangered Species Act (CESA) Threatened or Endangered

SE – listed as endangered under the California Endangered Species Act.

ST – listed as threatened under the California Endangered Species Act.

SR – listed as rare under the California Endangered Species Act.

SC – candidate for listing under the California Endangered Species Act.

[3]**CNPS Rare Plant Rank**:

1B: Considered rare, threatened, or endangered in California and elsewhere

2B: Plants rare, threatened, or endangered in California, but more common elsewhere

3: Plants for which we need more information – review list.

4: Plants of limited distribution – watch list.

Decimal notations: .1 – Seriously endangered in California, .2 – Fairly endangered in California, .3 – Not very endangered in California.

[4]**County List**

A: Plants rare, threatened, or endangered in California or elsewhere.

B: Plants rare, threatened, or endangered in California but more common elsewhere.

C: Plants which may be rare but need more information to determine their true rarity status.

D: Plants of limited distribution and are uncommon, but not presently rare or endangered.

It should be noted that all species common names and scientific names are taken from USFWS, CDFW and CNPS data available at the time of publication.

Special-Status Wildlife

Table 2.4-5 lists a total of 50 special-status wildlife species that occur, or have the potential to occur, within the Alpine CPA. Of these species, 16 are amphibians or reptiles, 12 are birds, 17 are mammals, and five are invertebrates. Four of these species are federally endangered, one species is threatened, and one species is candidate for federal listing. Additionally, two species are state endangered, two species are state threatened, no species are candidates for state listing, and 28 species are California Species of Special Concern. Seven species are on the CDFW watch list and one species has fully protected status under the Fish and Game Code. Under the County's designations, 18 are Group 1 and 26 are Group 2 species. Table 2.4-5 identifies these species and defines the County Groups.

Table 2.4-5. Special-Status Wildlife Species with Potential to Occur within the Alpine Community Plan Area

Common Name	Scientific Name	Federal Status[1]	State Status[2]	Habitat Associations
County Group 1[3]				
arroyo toad	*Anaxyrus californicus*	FE	SSC	Semi-arid regions near washes or intermittent streams, including valley-foothill and desert riparian, and desert washes.
Bell's sparrow	*Artemisiospiza belli*	None	WL	Nests in chaparral dominated by fairly dense stands of chamise. Found in coastal sage scrub in south of range.
coastal cactus wren	*Campylorhynchus brunneicapillus sandiegensis*	None	SSC	Coastal sage scrub with tall Opuntia cactus for nesting and roosting.
coastal California gnatcatcher	*Polioptila californica californica*	FT	SSC	Low, coastal sage scrub in arid washes, on mesas, and on slopes.
Cooper's hawk	*Accipiter cooperii*	None	WL	Open interrupted, or marginal type woodland. Nest sites mainly found in riparian growths of deciduous trees in canyon bottoms on river floodplains.
golden eagle	*Aquila chrysaetos*	None	WL/FP	Rolling foothills, mountain areas, sage-juniper flats, and desert.
Hermes copper butterfly	*Lycaena hermes*	FC	None	Found in southern mixed chaparral and coastal sage scrub at western edge of Laguna Mountains.
least Bell's vireo	*Vireo bellii pusillus*	FE	SE/SSC	Summer resident of southern California in low riparian in vicinity of water or in dry river bottoms; below 2,000 feet.

Common Name	Scientific Name	Federal Status[1]	State Status[2]	Habitat Associations
prairie falcon	*Falco mexicanus*	None	WL	Inhabits dry, open terrain, either level or hilly.
quino checkerspot butterfly	*Euphydryas editha quino*	FE	None	Sunny openings within chaparral and coastal sage scrublands.
southern California rufous-crowned sparrow	*Aimophila ruficeps canescens*	None	WL	Found in coastal sage scrub and sparse mixed chaparral.
southwestern pond turtle	*Actinemys pallida*	None	SSC	A thoroughly aquatic turtle of ponds, marshes, rivers, streams and irrigation ditches, usually with aquatic vegetation, below 6,000 feet elevation.
southwestern willow flycatcher	*Empidonax traillii extimus*	FE	SE	Riparian woodlands.
Swainson's hawk	*Buteo swainsoni*	None	ST	Breeds in grasslands with scattered trees, juniper-sage flats, riparian areas, savannahs, and agricultural or ranch lands with groves or lines of trees.
Thorne's hairstreak butterfly	*Callophrys thornei*	None	None	Associated with the endemic Tecate cypress (*Cupressus forbesii*).
tricolored blackbird	*Agelaius tricolor*	None	ST/SSC	Requires open water, protected nesting substrate, and foraging area with available insect prey.
two-striped gartersnake	*Thamnophis hammondii*	None	SSC	Coastal California from vicinity of Salinas to northwest Baja California. From sea to about 7,000 feet elevation.
yellow-breasted chat	*Icteria virens*	None	SSC	Summer resident that inhabits riparian thickets of willow and other brushy tangles near watercourses.

Common Name	Scientific Name	Federal Status[1]	State Status[2]	Habitat Associations
County Group 2[3]				
American badger	*Taxidea taxus*	None	SSC	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils.
big free-tailed bat	*Nyctinomops macrotis*	None	SSC	Low-lying arid areas in southern California.
Blainville horned lizard	*Phrynosoma blainvillii*	None	SSC	Inhabits coastal sage scrub and chaparral in arid and semi-arid climate conditions.
coast patch-nosed snake	*Salvadora hexalepis virgultea*	None	SSC	Brushy or shrubby vegetation in coastal southern California.
Coast Range newt	*Taricha torosa*	None	SSC	Lives in terrestrial habitats and will migrate over 1 kilometer to breed in ponds, reservoirs, coastal drainages, or slow-moving streams.
coastal whiptail	*Aspidoscelis tigris stejnegeri*	None	SSC	Found in deserts and semi-arid areas with sparse vegetation and open areas. Also found in woodlands and riparian areas.
Coronado skink	*Plestiodon skiltonianus interparietalis*	None	WL	Found in grassland, chaparral, pinyon-juniper and juniper sage woodland, and pine-oak and pine forests.
Dulzura pocket mouse	*Chaetodipus californicus femoralis*	None	SSC	Found in coastal scrub, chaparral, and grasslands.
long-eared myotis	*Myotis evotis*	None	None	Found in all brush, woodland and forest habitats from sea level to about 9,000 feet. Prefers coniferous woodlands and forests.
long-legged myotis	*Myotis volans*	None	None	Most common in woodland and forest

Common Name	Scientific Name	Federal Status[1]	State Status[2]	Habitat Associations
				habitats above 4,000 feet.
northwestern San Diego pocket mouse	*Chaetodipus fallax*	None	SSC	Found in coastal scrub, chaparral, grasslands and sagebrush.
orange-throated whiptail	*Aspidoscelis hyperythra*	None	WL	Inhabits low-elevation coastal scrub, chaparral, and valley-foothill hardwood habitats.
pallid bat	*Antrozous pallidus*	None	SSC	Found in deserts, grasslands, shrublands, woodlands, and forests. Not common in open, dry habitats with rocky areas for roosting.
pocketed free-tailed bat	*Nyctinomops femorosaccus*	None	SSC	Variety of arid areas in southern California including pine-juniper woodlands, desert scrub, palm oasis, desert wash, and desert riparian.
red-diamond rattlesnake	*Crotalus ruber*	None	SSC	Found in chaparral, woodland, grassland, and desert areas from coastal San Diego County to the eastern slopes of the mountains.
rosy boa	*Charina trivirgata*	None	None	Found in desert and chaparral from the coast to the Mojave and Colorado deserts. Prefers moderate to dense vegetation and rocky cover.
San Diego black-tailed jackrabbit	*Lepus californicus bennettii*	None	SSC	Found in coastal sage scrub with intermediate canopy stages of shrub habitats and open shrub/herbaceous and tree/herbaceous edges.

Common Name	Scientific Name	Federal Status[1]	State Status[2]	Habitat Associations
San Diego desert woodrat	*Neotoma lepida intermedia*	None	SSC	Moderate to dense canopies of coastal scrub. Abundant in rock outcrops, rocky cliffs, and slopes.
San Diego ringneck snake	*Diadophis punctatus similis*	None	None	Found in open, fairly rocky areas and in moist areas near intermittent streams.
silvery legless lizard	*Anniella pulchra pulchra*	None	SSC	Occurs in sparsely vegetated areas of beach dunes, chaparral, pine-oak woodlands, desert scrub, sandy washes, and stream terraces with sycamores, cottonwoods, or oaks, where soil is moist.
Townsend's big-eared bat	*Corynorhinus townsendii*	None	SSC	Found in moist coastal forest to semi-desert scrublands, near riparian areas and wetlands.
western mastiff bat	*Eumops perotis californicus*	None	SSC	Found in many open and semi-arid to arid habitats, including conifer and deciduous woodlands, coastal scrub, grasslands, and chaparral.
western red bat	*Lasiurus blossevillii*	None	SSC	Prefers riparian areas dominated by cottonwoods, oaks, sycamores, and walnuts.
western small-footed myotis	*Myotis ciliolabrum*	None	None	Found in a wide range of habitats near water, including arid wooded, brushy uplands, and open stands in forests and woodlands. Seeks cover in caves, buildings, mines and crevices.
western spadefoot	*Spea hammondii*	None	SSC	Occurs primarily in grassland habitats but can be found in valley-

Common Name	Scientific Name	Federal Status[1]	State Status[2]	Habitat Associations
				foothill hardwood woodlands.
Yuma myotis	*Myotis yumanensis*	None	None	Optimal habitats are open forests and woodlands with sources of water over which to feed.
Not on County List				
California glossy snake	*Arizona elegans occidentalis*	None	SSC	Inhabits arid scrub, rocky washes, grasslands and chaparral.
harmonius halictid bee	*Halictus harmonius*	None	None	Known only from the foothills of the San Bernardino Mountains. Possibly, also the San Jacinto Mountains.
hoary bat	*Lasiurus cinereus*	None	None	Prefers open habitats or habitat mosaics, with access to trees for cover and open areas or habitat edges for feeding. Roosts in dense foliage of medium to large trees.
peak shoulderband snail	*Helminthoglypta milleri*	None	None	Found in rock piles at Cuyamaca Peak.
western yellow bat	*Lasiurus xanthinus*	None	SSC	Found in valley foothill riparian, desert riparian, desert wash, and palm oasis habitats.

Status:

[1]Federal

FE – listed as endangered under the federal Endangered Species Act.
FT – listed as threatened under the federal Endangered Species Act.
FC – candidate for listing under the federal Endangered Species Act.

[2]State

SE - listed as endangered under the California Endangered Species Act.
ST – listed as threatened under the California Endangered Species Act.
SC – candidate for listing under the California Endangered Species Act.
FP – fully protected species in California.
SSC – species of special concern in California.
WL – CDFW watch list.

[3]County Group

Group 1 - listed as threatened or endangered, or with a natural history requirement that increases their sensitivity.

Group 2 - becoming less common but are not so rare that extinction is imminent without immediate action.

It should be noted that all species common names and scientific names are taken from USFWS and CDFW data available at the time of publication.

Critical Habitat

The prior EIRs identified USFWS-designated critical habitat for the arroyo toad. Critical habitat has since been designated within the Alpine CPA for coastal California gnatcatcher and San Diego thornmint as shown in Table 2.4-6 and Figures 2.4-2a and 2.4-2b.

Within the seven subareas, only portions of Subareas 4, 5, and 7 contain critical habitat as shown in Table 2.4-7 and Figures 2.4-2a and 2.4-2b. Subarea 5 contains critical habitat for arroyo toad and Subareas 4 and 7 contain critical habitat for coastal California gnatcatcher. Critical habitat for San Diego thornmint exists within Subarea 7.

Table 2.4-6: USFWS Critical Habitat within the Alpine Community Plan Area

Common Name	Scientific Name	Approximate Area within Alpine CPA (acres)
Arroyo toad	*Anaxyrus californicus*	2,414
Coastal California gnatcatcher	*Polioptila californica californica*	2,888
San Diego thornmint	*Acanthomintha ilicifolia*	756
Total		**6,057**

Table 2.4-7: USFWS Critical Habitat within the Seven Subareas

Common Name	Approximate Acreage within Subarea							Total within Subareas
	1	2	3	4	5	6	7	
Arroyo toad	0.00	0.00	0.00	0.00	278.87	0.00	474.43	753.30
Coastal California gnatcatcher	0.00	0.00	0.00	0.22	0.00	0.00	174.73	174.95
San Diego thornmint	0.00	0.00	0.00	0.00	0.00	0.00	203.74	203.74

2.4.1.3 Wildlife Movement Corridors and Habitat

As described in the prior EIRs, the Multiple Species Conservation Program (MSCP) County of San Diego Subarea Plan (South County Subarea Plan), of which the Alpine CPA is a part, identified core habitat areas and priority linkages between them. A habitat linkage, which is currently undeveloped/native habitat, was identified within the western portion of Alpine CPA in the South County Subarea Plan, linking habitat patches from southern San Diego County to important aquatic resources at El Capitan Reservoir (Figures 2.4-4a and 2.4-4b). The urbanized areas within the Alpine CPA generally do not provide regionally significant wildlife movement corridors, although the undeveloped areas within the Alpine CPA would provide opportunities for wildlife movement and constitute habitat linkages between other undeveloped areas in the County. It is important to note that the eastern portion of the Alpine CPA is within the CNF, which also encompasses large areas of the Central Mountain CPA to the north and east and Mountain Empire and Jamul-Dulzura CPAs to the south. US Forest Service (USFS) lands provide regional habitat linkages and wildlife movement opportunities as development is generally prohibited.

In addition to regional habitat linkages, the Alpine CPA contains drainages, creeks, valleys, and other undeveloped areas that provide opportunities for localized wildlife movement within the Alpine CPA. Within the subareas, Subarea 5 is largely undeveloped and provides opportunities for wildlife movement. The southern portion of Subarea 5 encompasses a portion of the Sweetwater River valley, which provides wildlife movement to Palo Verde Lake.

2.4.2 Regulatory Framework

Sections 2.4.2 of the prior EIRs included a discussion of the regulatory framework related to biological resources and is incorporated by reference. The regulations described in the prior EIRs are the same as the regulations evaluated for the proposed project. No changes to those regulations have been identified that would alter the conclusions from the prior EIRs. All regulations used from the prior EIRs were reviewed to ensure they are still valid and are incorporated by reference.

Applicable federal regulations include:

- Federal ESA
- Migratory Bird Treaty Act
- Bald and Golden Eagle Protection Act
- Federal Water Pollution Control Act.

Applicable state regulations include:

- California Fish and Game Code
- California ESA
- Lake and Streambed Alteration Program
- Porter-Cologne Water Quality Control Act
- Natural Community Conservation Planning (NCCP) Act of 1991.

Applicable local regulations include:

- San Diego County Zoning Ordinance
- Multiple Species Conservation Program (MSCP)
- County of San Diego Code of Regulatory Ordinances Sections 86.501-86.509, Biological Mitigation Ordinance (BMO)
- County of San Diego Code of Regulatory Ordinances Sections 86.601-86.608 Resource Protection Ordinance (RPO)
- County of San Diego Code of Regulatory Ordinances Sections 76.801-67.814, Watershed Protection, Stormwater Management, and Discharge Control Ordinance (WPO)
- County of San Diego Code of Regulatory Ordinances Sections 86.501-86.509, Habitat Loss Permit (HLP) Ordinance
- San Diego County Board of Supervisors (BOS) Policy I-123, Conservation Agreement for the MSCP.

Applicable local regulations not included in or adopted after adoption of the 2011 General Plan or FCI EIR are described below.

2.4.2.1 Habitat Loss Permit Ordinance

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

The "Planning Agreement by and among the County of San Diego, the California Department of Fish and Game, and the United States Fish and Wildlife Service regarding the North and East County Multiple Species Conservation Program Plans: Natural Community Conservation Program Plans and Habitat Conservation Plans" expired as of January 31, 2020 and HLPs are not being issued at this time. If the County, USFWS, and CDFW do not enter into a new planning agreement, all individual projects impacting coastal sage scrub habitat would be required to obtain individual incidental take permits (Section 7 or 10(a) permits), as applicable."

2.4.2.2 Multiple Species Conservation Plan

The County of San Diego is in the process of developing an HCP (the last of three) for the eastern unincorporated area. The HCPs will work together to protect sensitive plants, animals, and their habitats in the unincorporated areas. At present, the County Subarea Plan (South County Plan) is being implemented and the draft North County Plan is in process. The East County Plan is a cooperative effort among the County, USFWS, and CDFW. Authority for this process comes from the California NCCP Act and Section 10(a) of the federal ESA that addresses HCPs.

At this time, the East County Plan is in preliminary stages and is scheduled to be further developed after adoption of the draft North County Plan. A portion of the Alpine CPA is within the South County Plan boundaries, while the remainder is within the boundaries of the draft East County Plan. Given the state of the East County Plan, analysis under this SEIR has largely considered the South County Plan as the presiding natural community conservation plan (NCCP).

2.4.2.3 Conservation Subdivision Program

The Conservation Subdivision Program (CSP) was developed to encourage residential subdivision design that results in the preservation of local biodiversity, retention of existing agriculture/farmland, and other benefits to sensitive environmental resources. This program is mandatory when subdividing property with General Plan residential land use designations of Semi-Rural 10 and Rural Lands 20, 40, and 80. The CSP is being implemented through the Zoning Ordinance, Subdivision Ordinance, and the RPO.

2.4.2.4 Zoning Ordinance Sections 8900–8980, Alpine Village Core Regulations (Adopted July 31, 2014)

The Alpine Village Core regulations apply to the area identified in the Alpine CPA as the Village Core and are intended to preserve and promote the village character while creating a balanced automobile, bicycling, and pedestrian-friendly environment for residents, business owners, and visitors. These regulations are also intended to encourage the continuation and growth of the character of Alpine while promoting the economic development of the Alpine Village Core. These regulations establish permitted uses, development standards, design standards, and thoroughfare design standards. The Land Development Code is currently being updated, and the Alpine Village Core Regulations may be revised as part of that process.

2.4.2.5 County of San Diego General Plan Policies

The General Plan includes goals and policies intended to protect biological resources within the Conservation and Open Space Element, as well as the Land Use Element.

Conservation and Open Space Element

Goal COS-1 is to create and maintain a regionally managed, interconnected preserve system that embodies the regional biological diversity of San Diego County. Policies COS-1.1 through COS-1.11 support this goal by describing how biological resources should be managed and preserved. Policies COS-1.1, COS-1.2, COS-1.3, COS-1.6, COS 1.7, and COS-1.8 require the creation of a coordinated preserve system, within which private development is prohibited, to be monitored and managed by enforcement staff and volunteer preserve managers, and the policies also provide for funding to manage these preserve systems. Policies COS-1.4, COS-1.5, COS-1.8, and COS-1.10 require collaboration with other jurisdictions and the public to fund and achieve resource management goals. Policy COS-1.9 requires the prevention and removal of invasive species within and adjacent to biological preserves.

Goal COS-2 is to protect and create sustainable ecosystems and sustainable development. Policies COS-2.1 and COS-2.2 support this goal by requiring development to minimize impacts to natural habitat

Goal COS-3 is to protect and restore wetlands. Policies COS-3.1 and COS-3.2 support this goal by requiring development projects to preserve natural wetland areas and mitigate for any loss of wetlands and associated habitat functions and values.

Land Use Element

Goal LU-6 is to build development that balances the natural environment, scarce resources, natural hazards, and local character. Policies LU-6.1, LU-6.2, LU-6.3, LU-6.4, LU-6.6, and LU-6.7 support this goal by describing how development should be designed, sited, and implemented. Policies LU-6.1 and LU-6.7 require the protection of natural resources and creation of open space. Policies LU-6.2, LU-6.3, LU-6.4, and LU-6.6 require that projects and subdivisions be designed to consolidate the project footprint and use sustainable development practices (including incorporation of natural features) as well as maintain low density land uses in areas with sensitive natural resources.

Goal LU-10 is to utilize semi-rural and rural lands to protect natural resources, foster agriculture, and accommodate unique rural communities. Policy LU-10.2 supports this goal by requiring development in semi-rural and rural areas to preserve natural features and rural character, and to avoid sensitive resources.

2.4.2.6 Alpine CPU Policies

The following are policies from the Alpine CPU that are applicable to biological resources:

Land Use Element

Policy LU-6.1: Encourage cooperation with other agencies for trading and otherwise negotiating land transfers to consolidate land holdings.

Mobility Element

Policy M-1.6: Encourage the replacement of all trees lost during road construction/renovation projects.

Conservation and Open Space Element

Policy COS-1.1: Promote conservation education in the community and schools.

Policy COS-2.1: Explore incentives and tax breaks for planting trees and consider support for removal of non-native vegetation.

Policy COS-3.1: Encourage preservation/conservation of open space corridors that connect the community of Alpine to the following:

- Cleveland National Forest
- El Capitan and Loveland Reservoirs
- Sweetwater River Basin

2.4.3 Analysis of Project Effects and Determination of Significance

Based on guidance provided in the Guidelines and the Appendix G of the state CEQA Guidelines, the proposed project would result in a significant impact if it would:

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS.
- 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.
- Have a substantial adverse effect on federally protected wetlands as defined by the Clean Water Act (CWA) Section 404 through direct removal, filling, hydrological interruption, or other means.
- 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.
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- Conflict with the provisions of an adopted HCP; NCCP; or other approved local, regional, or state HCP

2.4.3.1 Issue 1: Special-Status Plant and Wildlife Species

Guidelines for the Determination of Significance Analysis

Based on Appendix G of CEQA and the County Guidelines for Determining Significance – Biological Resources, 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 CDFW or USFWS.

Impact Analysis

The prior EIRs determined that the General Plan would increase development in habitat inhabited by special-status plant and wildlife species and would have potentially significant direct, indirect, and cumulatively considerable impacts on these species. The discussion of impacts related to special-status plant and wildlife species from implementation of the General Plan can be found in Sections 2.4 of the prior EIRs and is hereby incorporated by reference.

Although implementation of General Plan policies and mitigation measures and compliance with applicable regulations would reduce the General Plan's project-level and cumulative impacts to the extent feasible, impacts on special-status plant and wildlife species from implementation of the General Plan were concluded to be significant and unavoidable.

In addition to a proposed increase in density and intensity, the proposed project has goals and policies that could help to reduce impacts from future development projects implemented under the proposed project, but also have the potential to create impacts on the environment. Therefore, the potential impacts from the goals and policies are described below.

This section includes an analysis of the proposed project's impacts on special-status plant and wildlife species. Special status species are defined in Sections 2.4.1.3 of the prior EIRs, and in Section 2.4.1.2 of this SEIR.

Direct Impacts

Vegetation Communities

Future development associated with the Alpine CPU could result in the removal of vegetation and habitats that support sensitive species. The estimated total area of impacts on vegetation communities found within the subareas is shown in Table 2.4-8, which provides a comparison of vegetation impacts under the General Plan and the proposed project.

As shown in Table 2.4-8, impacts to vegetation communities would be greater under the proposed project than the General Plan. Higher proposed densities and intensity would generally result in greater direct impacts on biological resources due to increased land area that could be developed. To accommodate the growth associated with buildout of the Alpine CPU and the changes proposed to the Mobility Element, it is anticipated that new or expanded infrastructure would also be required, such as the extension of roads and utility services. While most of the subareas are within parts of the community currently serviced by existing infrastructure, Subareas 4 and 5 are primarily large undeveloped areas. Future development within these subareas would likely include new roads or paving over existing dirt roads and the extension

Table 2.4-8: Impacts on Vegetation Communities within Subareas

Land Use/ Vegetation Community	General Plan Impacts (acres)	Proposed Project Impacts (acres)
Chaparral	3,130.29	3,727.50
Coastal Sage Scrub	90.87	181.71
Grasslands	48.83	137.64
Marsh	0.12	0.12
Meadows and Seeps	0.00	0.00
Other Woodlands	445.25	458.80
Riparian Vegetation	154.28	223.42
Water	0.00	0.00
Disturbed, Urban, Agriculture, Eucalyptus Woodland	1,155.99	1,484.19
Total	**5,025.61**	**6,213.37**

of utilities such as electrical power lines, telecommunications facilities, and sewer/water lines. Future development associated with the proposed project and the extension of infrastructure to accommodate this development and growth would likely require the removal of vegetation and habitat.

It should be noted that the acreages of vegetation community impacts provided in Table 2.4-8 are approximate due to various limitations, including the minimum size of features not able to be mapped; the potential presence of certain vegetation communities, such as coast live oak trees, within larger vegetation communities; and the potential that additional disturbance has occurred since vegetation mapping was completed. Site-specific analysis of impacts on biological resources, including biological resource surveys if deemed required by the County, would be required for future discretionary projects that could impact vegetation communities and special-status plant and wildlife species.

In addition, the following describes the vegetation communities and special-status plant and wildlife species within each subarea that could be impacted by future development associated with the proposed project.

Subarea 1

The eastern portion of Subarea 1 is generally developed and therefore does not contain any natural vegetation communities. However, the western portion of the subarea is currently undeveloped. Subarea 1 contains areas mapped as chaparral, urban-disturbed habitat, agriculture, and eucalyptus woodland. Special status plant species commonly associated with chaparral habitat include, but are not limited to, Dehesa beargrass, Dunn's mariposa lily, Encinitas baccharis, Gander's ragwort, Mexican flannelbush, and San Diego thornmint (see Table 2.4-4 for a full list of plant species associated with this habitat type). In addition, special-status wildlife species commonly associated with chaparral habitat include, but are not limited to, Hermes copper butterfly, quino checkerspot butterfly, Coronado skink, Dulzura pocket mouse, northwestern San Diego pocket mouse, and red-diamond rattlesnake (see Table 2.4-5 for a full list of wildlife species associated with this habitat type).

Subarea 1 would maintain the same density and intensity of development as currently allowed under the General Plan. As such, because development potential under the proposed project would not increase compared to the General Plan, impacts on the vegetation communities and habits within Subarea 1 and the special-status species they support would not be more severe than those identified in the prior EIRs.

However, similar to the prior EIRs, impacts would be **potentially significant** (Impact-BIO-1) and mitigation would be required.

Subarea 2

Subarea 2 is predominantly developed with residences, but also contains chaparral, coastal sage scrub, grasslands, disturbed habitat, agriculture, and eucalyptus woodland. The special-status plant and wildlife species commonly associated with chaparral habitat are described above under Subarea 1. Tables 2.4-3 and 2.4-4 show the full list of plant and wildlife species associated with chaparral habitat. Special status plant species commonly associated with coastal sage scrub and grasslands include San Diego thornmint (see Table 2.4-4 for a full list of plant species associated with this habitat type). Special status wildlife species commonly associated with coastal sage scrub include, but are not limited to, coastal cactus wren, coastal California gnatcatcher, Hermes copper butterfly, quino checkerspot butterfly, northwestern San Diego pocket mouse, San Diego black-tailed jackrabbit, and San Diego desert woodrat (see Table 2.4-5 for a full list of wildlife species associated with this habitat type). Special status wildlife species commonly associated with grasslands include, but are not limited to, Swainson's hawk, Coronado skink, Dulzura pocket mouse, and northwestern San Diego pocket mouse (see Table 2.4-5 for a full list of wildlife species associated with grasslands).

The re-designation of land uses within Subarea 2 would allow for higher density and intensity of development than currently allowed under the General Plan. As such, because the development potential under the proposed project would increase compared to the General Plan, impacts on the vegetation communities and habits within Subarea 2 and the special-status species they support would be more severe than those identified in the prior EIRs. Impacts would be **potentially significant** and mitigation would be required (Impact-BIO-1).

Subarea 3

Subarea 3 is sparsely developed and includes large-lot homes that are generally separated by lots containing natural open space. Subarea 3 contains several vegetation communities, including areas mapped as chaparral, other woodlands, grassland, riparian forest, urban, disturbed habitat, agriculture, and eucalyptus woodland. The special-status plant and wildlife species commonly associated with chaparral habitat are described above under Subarea 1. Special status plant species commonly associated with other woodlands, grassland, and riparian forest include, but are not limited to, Cuyamaca larkspur and San Diego thornmint (see Table 2.4-4 for a full list of plant species associated with these habitat types). In addition, special-status wildlife species commonly associated with these habitats include, but are not limited to, southwestern willow flycatcher, Swainson's hawk, yellow-breasted chat, coastal western whiptail, Coronado skink, Dulzura pocket mouse, and northwestern San Diego pocket mouse (see Table 2.4-5 for a full list of wildlife species associated with these habitat types).

Subarea 3 would maintain the same density and intensity of development as currently allowed under the General Plan. As such, because the development potential under the proposed project would not increase compared to the General Plan, impacts on the vegetation communities and habits within Subarea 3 and the special-status species they support would not be more severe than those identified in the prior EIRs. However, similar to the prior EIRs, impacts would be **potentially significant** (Impact-BIO-1) and mitigation would be required.

Subarea 4

Subarea 4 is occupied by low-density residential uses, Los Coches Creek Middle School, and large areas of undeveloped open space. Subarea 4 contains several vegetation communities, including areas mapped as chaparral, coastal sage scrub, grasslands, urban-disturbed habitat, agriculture, and eucalyptus woodland. The special-status plant and wildlife species commonly associated with these habitat types are described above under Subareas 1 through 3. In addition, plant and wildlife species associated with these habitats are listed in Tables 2.4-4 and 2.4-5, respectively. Subarea 4 also contains 0.22 acre of critical habitat for the coastal California gnatcatcher (Figure 2.4-2a).

The re-designation of land uses within Subarea 4 would allow for higher density and intensity of development than currently allowed under the General Plan. As such, because the development potential under the proposed project would increase compared to the General Plan, impacts on the vegetation communities and habits within Subarea 4 and the special-status species they support would be more severe than those identified in the prior EIRs. Impacts would be **potentially significant** and mitigation would be required (Impact-BIO-1).

Subarea 5

Subarea 5 is dominated by natural, undeveloped open space, some of which is located within the CNF. Subarea 5 is largely undeveloped and contains 278.87 acres of critical habitat for the arroyo toad (Figure 2.4-2a). Subarea 5 contains several vegetation communities, including areas mapped as chaparral, other woodlands, riparian forest, urban - disturbed habitat, agriculture, and eucalyptus woodland. The special-status plant and wildlife species commonly associated with these habitat types are described above under Subareas 1 and 3. In addition, plant and wildlife species associated with these habitats are listed in Tables 2.4-4 and 2.4-5, respectively.

The re-designation of land uses within Subarea 5 would reduce the density and intensity of development than currently allowed under the General Plan. The proposed project would redistribute land uses to include the following land use designations: Village Residential (VR-2), Semi-Rural Residential (SR-1; SR-4; SR-10), Rural Lands (RL-20; RL-40), General Commercial (GC), Rural Commercial (RC), and Public Agency Lands (PAL). This redistribution of land uses would result in a total decrease in density of 31 units.

As such, because the development potential under the proposed project would decrease compared to the General Plan, impacts on the vegetation communities and habits within Subarea 5 and the special-status species they support would not be more severe than those identified in the prior EIRS. However, similar to the prior EIRs, impacts would be **potentially significant** (Impact-BIO-1) and mitigation would be required.

Subarea 6

Subarea 6 is almost entirely developed, containing small pockets of vegetation in the western portion of the subarea. Subarea 6 contains areas predominantly mapped as urban, disturbed habitat, agriculture, and eucalyptus woodland, with small areas of chaparral and riparian forest. The special-status plant and wildlife species commonly associated with chaparral and riparian forest habitats are described above under Subareas 1 and 3. In addition, plant and wildlife species associated with these habitats are listed in Tables 2.4-4 and 2.4-5, respectively.

While the re-designation of land uses within Subarea 6 would allow for a change in land use than allowed under the current General Plan, Subarea 6 is almost entirely developed and contains minimal amounts of

vegetation. However, Subarea 6 still contains vegetation communities and habitats that support special-status plant and wildlife species. Development potential under the proposed project would increase compared to the General Plan; therefore, impacts to vegetation communities within Subarea 6 and the special-status species they support would be more severe than those identified in the prior EIRs. Impacts to special-status plant and wildlife species would be **potentially significant** and mitigation is required (Impact-BIO-1).

Subarea 7

The existing land use designations of Subarea 7 are SR-1, SR-2, SR-4, SR-10, RL-20, RL-40, RL-80, C-4, P/SP, TL, and VCMU. No changes to the land use types within Subarea 7 are proposed by the project. As such, because the development potential under the proposed project would not increase compared to the General Plan, impacts on the vegetation communities and habits within Subarea 7 and the special-status species they support would not be more severe than those identified in the prior EIRs. However, similar to the prior EIRs, impacts would be **potentially significant** (Impact-BIO-1) and mitigation would be required.

Critical Habitat

USFWS-designated critical habitat for three species occurs within the Alpine CPA. Future development associated with the proposed project would potentially result in the direct loss of critical habitat for coastal California gnatcatcher and the arroyo toad. All potential impacts to critical habitat for coastal California gnatcatcher (0.22 acre) would occur within Subarea 4 (Table 2.4-9). Critical habitat for coastal California gnatcatcher, arroyo toad, and San Diego thornmint is present within Subarea 7; however, no changes to the land use designations would occur under the proposed project. Because overall impacts on critical habitat would be greater under the proposed project, these impacts would be considered more severe than those identified in the prior EIRs (Impact-BIO-1).

Table 2.4-9: Impacts on Critical Habitat within Alpine CPU Subareas

Species	General Plan Impacts (acres)	Proposed Project (acres)
arroyo toad	279.57	480.42
coastal California gnatcatcher	20.97	21.18
San Diego thornmint	90.64	90.64
Total	**391.18**	**592.24**

It should be noted that not all impacts on critical habitat identified in Table 2.4-9 may occur within habitat areas that provide primary constituent elements[1] of habitat for the arroyo toad or coastal California gnatcatcher. Some areas mapped as critical habitat are located in developed or disturbed areas (i.e., urban, disturbed habitat, agriculture, eucalyptus woodland) that do not provide habitat for these species. Potential impacts on critical habitat would require site-specific analysis and project-level details during discretionary review of future projects associated with the Alpine CPU.

[1] Primary constituent elements are physical or biological features essential to the conservation of a species for which its designated or proposed critical habitat is based on (USFWS 2004).

Indirect Impacts

The types of potential indirect impacts on special-status species and their habitats as a result of future development associated with the Alpine CPU are generally the same as those described in the prior EIRs, and include the following:

- Decreased water quality in riparian areas may adversely affect vegetation and wildlife.
- Fugitive dust produced by construction would have potential to reduce the overall vigor of individual plants, increasing their susceptibility to pests or disease.
- Colonization of nonnative plants from construction sites into adjacent native habitats.
- Edge effects due to construction of new roadways or other development that have the potential to fragment habitat. Increased human activity adjacent to undeveloped areas has the potential to increase the effects of habitat fragmentation.
- Construction of roadways and utility infrastructure has the potential to deter wildlife movement, degrade existing vegetation, compact soils, change natural runoff patterns, facilitate the invasion of nonnative species, and increase chances of fire.
- Increased traffic and construction noise have the potential to reduce reproductive success of breeding birds.
- Night lighting on native habitats has the potential to increase predation by nocturnal predators and disrupt essential behavioral and ecological processes.

Because the proposed project would allow for increased density and intensity compared to the General Plan, associated project activities have the potential to cause a more severe significant indirect impacts compared to those identified in the prior EIRs. Indirect impacts are **potentially significant** and mitigation would be required (Impact-BIO-1).

Federal, State, and Local Regulations and Existing Regulatory Processes

As identified in Section 2.4.2, there are numerous federal, state, and local regulations in place to protect special-status plant and wildlife species in the County that are also applicable to the Alpine CPU.

The BMO sets out specific mitigation requirements for impacts to sensitive species to protect the high number of sensitive plants and animal species occurring in and outside of the preserved areas throughout the County.

The federal ESA provides a program for the conservation of federally listed endangered and threatened species, which are those deemed of esthetic, ecological, educational, historical, recreational, and scientific value.

The California Fish and Game Code and California ESA require that mitigation measures or alternatives be taken to address a particular impact on a candidate species, threatened species, or endangered species to conserve, protect, restore, and enhance any endangered species or threatened species as designated by the California ESA.

Furthermore, the General Plan includes Policy COS-1.3 within the Conservation Element, which requires the monitoring, management, and maintenance of a regional preserve system facilitating the survival of native species and the preservation of healthy populations of rare, threatened, or endangered species.

Discretionary projects are reviewed for impacts to special-status plant and wildlife species based on the County's Biological Guidelines and CEQA. These guidelines require that evaluations include whether subsequent projects would directly, indirectly, or cumulatively result in impacts to these species. Therefore, when subsequent discretionary projects are proposed for development within the Alpine CPA, these projects would be analyzed through the CEQA process for potential impacts related to special-status plant and wildlife species.

Summary of Impacts

The proposed project would re-designate land uses within four of seven subareas of the Alpine CPA, overall increasing density and intensity in the CPA beyond what was analyzed in the prior EIRs. Individual projects allowed under the proposed project would be required to conduct site-specific biological resources surveys, if deemed necessary by the County, to determine the extent of potential impacts on special-status species and sensitive habitat. In addition, future development projects would be required to comply with federal, state, and local laws and regulations (listed above in Section 2.4.2) that are in place to protect special-status species and their habitats. Each of these laws and regulations is fully described in the prior EIRs. Despite mandatory compliance with laws and regulations, direct and indirect impacts on special-status species and their habitats could still occur. Because the proposed project would allow for increased density and intensity compared to the General Plan, associated project activities have the potential to result in more severe significant impacts on special-status species and sensitive habitat compared to those identified in prior EIRs (Impact-BIO-1).

Implementation of General Plan policies and mitigation measures would reduce the proposed project's impacts on special-status species and sensitive habitat, but not below a level of significance because it cannot be ensured that impacts from future development could be fully mitigated. Therefore, Impact-BIO-1 would be **potentially significant** and mitigation would be required.

2.4.3.2 Issue 2: Riparian Habitat and Other Sensitive Natural Communities

Guidelines for the Determination of Significance

Based on Appendix G of CEQA and the County Guidelines for Determining Significance – 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 prior EIRs determined that implementation of the General Plan would increase development in riparian habitat that would have the potential to result in significant direct, indirect, and cumulatively considerable impacts on riparian habitat. The discussion of impacts related to riparian habitat from implementation of the General Plan can be found in Sections 2.4 of the prior EIRs and is hereby incorporated by reference. Although implementation of General Plan policies and mitigation measures and compliance with applicable regulations would reduce the General Plan's project-level and cumulative impacts to the extent feasible, impacts on riparian habitat and other sensitive natural communities were concluded to be significant and unavoidable.

Section 2.4.3.1, Issue 1, discusses the potential impacts of the proposed project on vegetation community types, some of which are considered sensitive natural communities. Sensitive natural communities analyzed in Section 2.4.3.1 include chaparral, coastal sage scrub, and grasslands, therefore, this section focuses solely on riparian habitats. Riparian habitats within the Alpine CPA that could be impacted include Southern Cottonwood-Willow Riparian Forest, Southern Coast Live Oak Riparian Forest, and Southern Riparian Forest.

Direct Impacts

Direct impacts on riparian habitats would include removal or disturbance due to new development associated with the proposed project. Potential direct impacts on riparian habitats were estimated using the same methodology described in Section 2.4.3.1. All subareas except Subarea 1 contain riparian habitat. Table 2.4-10 shows the approximate acreage of riparian habitats potentially impacted by the proposed project, as well as a comparison of riparian habitat impacts under the General Plan.

Table 2.4-10: Impacts on Riparian Habitat

Riparian Community	General Plan Impacts (acres)	Proposed Project Impacts (acres)
Southern Cottonwood-Willow Riparian Forest	25.51	12.88
Southern Coast Live Oak Riparian Forest	114.73	160.46
Southern Riparian Forest	4.47	4.47
Total	**144.71**	**177.81**

As shown in Table 2.4-10, impacts on riparian habitat would be greater under the proposed project than the General Plan. Higher proposed densities and intensities would generally result in greater impacts on these resources due to increased land area that could be developed. It should be noted that the acreages of riparian habitat impacts provided in Table 2.4-10 are approximate due to various limitations, similar to those described under Issue 1. Site-specific analysis of impacts on riparian habitat, including biological resource surveys if deemed required by the County, would be required for future discretionary projects that could impact riparian habitat.

In addition, the following describes the riparian habitats within each subarea that could be impacted by future development associated with the proposed project.

Subarea 1

Subarea 1 does not contain any riparian habitat nor are there any proposed changes to this subarea. As such, **no impacts** would occur as a result of the proposed project.

Subarea 2

Subarea 2 is predominantly developed with residences and does not contain large areas of natural vegetation. However, Subarea 2 contains areas mapped as Southern Coast Live Oak Riparian Forest. Other sensitive vegetation communities within Subarea 2 include chaparral, coastal sage scrub, and grasslands, as discussed under Issue 1. The re-designation of land uses within Subarea 2 would allow for higher density and intensity development than currently allowed under the General Plan. As such, because the development potential under the proposed project would increase compared to the General Plan, impacts on riparian habitat and other sensitive natural communities within Subarea 2 would be more severe than

those identified in the prior EIRs. Impacts would be **potentially significant** and mitigation would be required (Impact-BIO-2).

Subarea 3

Subarea 3 is sparsely developed and includes large-lot homes that are generally separated by lots containing natural open space. Subarea 3 contains areas mapped as Southern Riparian Forest and Southern Coast Live Oak Riparian Forest. Other sensitive vegetation communities within Subarea 3 include chaparral and grasslands. Therefore, because the development potential under the proposed project would not increase compared to the General Plan, impacts on riparian habitat and other sensitive natural communities within Subarea 3 would not be more severe than those identified in the prior EIRs. However, similar to the prior EIRs, impacts would be **potentially significant** (Impact-BIO-2) and mitigation would be required.

Subarea 4

Subarea 4 is occupied by low-density residential uses, Los Coches Creek Middle School, and large areas of undeveloped open space. Subarea 4 contains areas mapped as Southern Coast Live Oak Riparian Forest. Other sensitive vegetation communities within Subarea 4 include chaparral, coastal sage scrub, and grasslands. The re-designation of land uses within Subarea 4 would allow for higher density and intensity of development than currently allowed under the General Plan. As such, because the development potential under the proposed project would increase compared to the General Plan, impacts on riparian habitat and other sensitive natural communities within Subarea 4 would be more severe than those identified in the prior EIRs. Impacts would be **potentially significant** and mitigation would be required (Impact-BIO-2).

Subarea 5

Subarea 5 is dominated by natural, undeveloped open space, some of which is located within the CNF under jurisdiction of USNFS. Subarea 5 contains areas mapped as Southern Riparian Forest, Southern Coast Live Oak Riparian Forest, and Southern Cottonwood-Willow Riparian Forest. Other sensitive vegetation communities within Subarea 5 include chaparral and other woodlands. The re-designation of land uses within Subarea 5 would reduce the density of development from that currently allowed under the General Plan.

As such, because the development potential under the proposed project would decrease compared to the General Plan, impacts on riparian habitat and other sensitive natural communities within Subarea 5 and the special-status species they support would not be more severe than those identified in the prior EIRs. However, similar to the prior EIRs, impacts would be **potentially significant** (Impact-BIO-2) and mitigation would be required.

Subarea 6

Subarea 6 is almost entirely developed, containing small pockets of vegetation in the western portion of the subarea. However, Subarea 6 contains areas mapped as Southern Coast Live Oak Riparian Forest. Other sensitive vegetation communities within Subarea 6 include small areas of chaparral. While the re-designation of land uses within Subarea 6 would allow for higher density and intensity of development than currently allowed under the General Plan, Subarea 6 is almost entirely developed and contains minimal amounts of vegetation. However, Subarea 6 still contains riparian habitat and other sensitive natural communities. As such, because the development potential under the proposed project would

increase compared to the General Plan, impacts on riparian habitat and other sensitive natural communities within Subarea 6 would be more severe than those identified in the prior EIRs. Impacts would be **potentially significant** and mitigation would be required (Impact-BIO-2)

Subarea 7

Subarea 7 contains areas mapped as Southern Riparian Forest, Southern Coast Live Oak Riparian Forest, and Southern Cottonwood-Willow Riparian Forest. The existing land use designations of Subarea 7 are SR-1, SR-2, SR-4, SR-10, RL-20, RL-40, RL-80, C-4, P/SP, TL, and VCMU. No changes to the land use types within Subarea 7 are proposed by the project. As such, because the development potential under the proposed project would not increase compared to the General Plan, impacts on riparian habitat and other sensitive natural communities within Subarea 7 would not be more severe than those identified in the prior EIRs. However, similar to the prior EIRs, impacts would be **potentially significant** (Impact-BIO-2) and mitigation would be required.

Indirect Impacts

The types of indirect impacts on riparian and other sensitive habitats that would potentially occur from future development associated with the proposed project are fundamentally consistent with those described in the prior EIRs. In addition to indirect impacts described in Section 2.4.3.1, indirect impacts on riparian habitats would also include the following:

- Degradation of water quality due to runoff
- Drawdown of the groundwater table due to increased development
- Modification of the natural flow of streams
- Increased stormwater runoff.

These changes would similarly result in modified streamflow or introduction of pollutants to riparian habitats. As further discussed in Section 2.8, *Hydrology and Water Quality*, it is anticipated that both point and non-point source pollutants caused by increased future development as a result of the proposed project would potentially degrade water quality of surface waters. Additionally, implementation of the proposed project would potentially result in significant impacts on groundwater supply and recharge. These direct hydrological effects would, therefore, result in potentially significant indirect impacts on riparian habitats. Accordingly, because the proposed project would allow for increased density and intensity compared to the General Plan, potential indirect impacts on riparian habitats would be more severe than those identified in the prior EIRs (Impact-BIO-2).

Federal, State, and Local Regulations and Existing Regulatory Processes

As identified in Section 2.4.2, there are numerous federal, state, and local regulations in place to protect riparian habitat and sensitive natural communities in the County that are also applicable to the Alpine CPU.

The RPO requires that controls be placed on development to preserve sensitive biological habitats and that certain discretionary projects require Resource Protection Studies to protect sensitive lands and prevent their degradation and loss.

The BMO directs preservation of land that can be combined into contiguous areas of habitat and identifies habitat and vegetation communities on discretionary project sites and areas proposed for mitigation.

The County of San Diego Code of Regulatory Ordinances Sections 86.501-86.509, HLP Ordinance provides a methodology through which the County is authorized to issue "take permits" for the California gnatcatcher (in the form of HLPs) in lieu of Section 7 or 10(a) Permits typically required from USFWS, which apply to coastal sage scrub habitat regardless of whether the habitat is occupied by the California gnatcatcher.

Furthermore, the General Plan includes Policy COS-3.1 within the Conservation Element, which requires development to preserve existing natural wetland areas and associated transitional riparian and upland buffers and retain opportunities for enhancement.

Discretionary projects are reviewed for impacts to riparian habitat and sensitive natural communities based on the County's Biological Guidelines and CEQA. Therefore, when subsequent discretionary projects are proposed for development within the Alpine CPA, these projects would be analyzed through the CEQA process for potential impacts related to riparian habitat and sensitive natural communities.

Summary of Impacts

With the exception of Subarea 1, all other subareas contain riparian habitat, including Southern Cottonwood-Willow Riparian Forest, Southern Coast Live Oak Riparian Forest, and Southern Riparian Forest. Future projects allowed under the proposed project would be required to conduct site-specific biological resources surveys to determine the extent of potential impacts on riparian habitat. However, because the proposed project would allow for increased density and intensity compared to the General Plan, associated project activities have the potential to result greater impacts on riparian habitat and other sensitive natural communities (as discussed under Issue 1). Therefore, direct and indirect impacts on riparian habitat and other sensitive natural communities associated with the proposed project would be more severe than those identified in the prior EIRs (Impact-BIO-2).

General Plan policies would reduce the potential for proposed land uses and development associated with the proposed project to result in substantial adverse effects on riparian habitat and other sensitive natural communities by requiring preservation of wetlands and associated buffers. Implementation of General Plan policies and mitigation measures would reduce the proposed project's impacts on riparian habitat and other sensitive natural communities, but not below a level of significance because it cannot be ensured that sensitive habitat impacted by future development could be replaced and that any necessary resource agency permits would be issued. Therefore, Impact-BIO-2 would be **potentially significant** and mitigation would be required.

2.4.3.3 Issue 3: Federally Protected Wetlands

Guidelines for the Determination of Significance

Based on the Appendix G of CEQA and the County Guidelines for Determining Significance – Biological Resources, 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

Federally protected wetlands are defined in CWA Section 404 as areas 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. Federal wetlands are areas that meet all of the following criteria: have vegetation adapted to wetland conditions (hydrophytic vegetation), evidence of soil that has been altered by anerobic conditions from frequent inundation (hydric soils), and evidence of wetland hydrology. The County's RPO definition of wetland mirrors the USFWS wetland definition and is generally broader and more encompassing as it only requires the presence of one of the following: hydrophytic vegetation, hydric soils, or an ephemeral or perennial stream whose substrate is predominately non-soil.

The prior EIRs determined future development would result in potentially significant direct and indirect impacts on federally protected wetlands but would not result in a cumulatively considerable impact on federally protected wetlands. The discussion of impacts related to federally protected wetlands from implementation of the General Plan can be found in Sections 2.4 of the prior EIRs and is hereby incorporated by reference. Impacts were determined to be less than significant with implementation of mitigation measures and General Plan policies by requiring implementation of the RPO and BMO; minimization of edge effects; requiring development projects to obtain CWA Section 401/404 permits; and preservation of wetlands and wetland buffers.

Table 2.4-11 summarizes the wetland types within the seven subareas, as well as the estimated acreages of impacts under the General Plan and proposed project. The mapping data used to identify wetland areas potentially impacted by the proposed project (Figures 2.4-3a and 2.4-3b) are conceptual in nature and would need to be verified through site-specific project-level surveys and wetland delineations.

Table 2.4-11: Potential Impacts on Wetlands

Wetland Type[1]	Existing Area within Alpine CPU Subareas (acres)	General Plan Impacts (acres)	Proposed Project Impacts (acres)
Federal Wetlands	103.08	13.56	49.65
County RPO Wetlands	532.82	183.27	257.17
Total	**635.90**	**196.83**	**306.83**

Notes:

[1] There is some overlap between federal and County RPO wetlands within the Alpine CPA as well as each of the subareas. As a result, the acreages provided in this table are a conservative estimate of wetlands that could be impacted under the General Plan and the proposed project.

As shown in Table 2.4-11, the proposed project could result in greater impacts on federally protected and County RPO wetlands compared to the General Plan. Direct impacts on federally protected and County RPO wetlands would occur if future development associated with Alpine CPU resulted in the removal, filling, hydrological interruption, or other disturbance to these resources. County GIS data were utilized to determine the approximate location and acreages of federally protected and County RPO wetlands within the seven subareas. It should be noted that the acreages of wetlands impacts identified in Table 2.4-11 are approximate estimates of potential impacts. As such, specific impacts on wetlands can only be determined through site-specific surveys, a wetland delineation, and project-level details once future discretionary projects are proposed.

Federal, State, and Local Regulations and Existing Regulatory Processes

As identified in Section 2.4.2, there are numerous federal, state, and local regulations in place to protect federally protected wetlands in the County that are also applicable to the Alpine CPU.

The RPO requires that controls be placed on development to preserve the County's wetlands and that certain discretionary projects require Resource Protection Studies to protect sensitive lands and prevent their degradation and loss.

The County of San Diego Code of Regulatory Ordinances Sections 76.801-67.814, WPO protects water resources and improves water quality by regulating stormwater runoff, which could have adverse effects on wetland resources.

Furthermore, the General Plan includes Policies COS-3.1 and COS-3.2 within the Conservation Element, which requires development to preserve existing natural wetland areas and associated transitional riparian and upland buffers and retain opportunities for enhancement and requires development projects to mitigate any unavoidable losses of wetlands, including their habitat functions and values; and to protect wetlands from a variety of discharges and activities.

Discretionary projects are reviewed for impacts to federally protected wetlands based on the County's Biological Guidelines and CEQA. Therefore, when subsequent discretionary projects are proposed for development within the Alpine CPA, these projects would be analyzed through the CEQA process for potential impacts related to federally protected wetlands.

Summary of Impacts

As summarized in Table 2.4-11, approximately 49.65 acres of federally protected wetlands and 257.17 acres of County RPO wetlands would potentially be impacted by future development associated with the proposed project. The proposed project would have the potential to result in substantial habitat loss of wetlands by direct removal (e.g., clearing, grading, or grubbing). Within the seven subareas, federally protected wetlands are present within Subareas 2, 4, 5, and 7. Additionally, County RPO wetlands are present within Subareas 2 through 7. As such, with the exception of Subarea 1, development within all subareas could result in the loss of federally protected and/or County RPO wetlands. Therefore, because the proposed project would allow for increased density and intensity compared to the General Plan, potential impacts on federally protected and County RPO wetlands could be more severe than those identified in the prior EIRs and would be **potentially significant** (Impact-BIO-3).

2.4.3.4 Issue 4: Wildlife Movement Corridors and Nursery Sites

Guidelines for the Determination of Significance

Based on Appendix G of CEQA and the County Guidelines for Determining Significance – Biological Resources, 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 prior EIRs determined that future development in undeveloped areas would result in potentially significant direct and indirect impacts on wildlife corridors and nursery sites, as well as cumulative impacts on wildlife corridors and nursery sites. The discussion of impacts related to wildlife corridors and nursery sites from implementation of the General Plan can be found in Sections 2.4 of the prior EIRs and is hereby incorporated by reference. Although implementation of General Plan policies and mitigation measures and compliance with applicable regulations would reduce the General Plan's project-level and

cumulative impacts to the extent feasible, impacts on wildlife corridors and nursery sites were concluded to be significant and unavoidable.

Wildlife Corridors

A habitat linkage was identified on the west side of the Alpine CPA within the boundaries of the County's adopted Multiple Species Conservation South County Subarea Plan (SCMSCP), linking habitat patches from south San Diego County to important aquatic resources at El Capitan Reservoir. Approximately 14.5 acres of habitat linkage identified by the SCMSCP is within Subarea 4 of the Alpine CPU area. Future development associated with the proposed project would not result in a significant constriction or blockage to this wildlife movement corridor because this area is within a PAMA and future discretionary development would be required to evaluate this linkage and mitigate as appropriate. Indirect impacts on wildlife corridors may occur from increased noise levels, artificial lighting, visual barriers, or other consequences of land use changes, infrastructure, and increased density. These impacts would increase compared to current levels experienced in Subarea 4 and impacts on wildlife corridors would be **potentially significant**. Therefore, impacts on wildlife corridors would be more severe than those identified in the prior EIRs (Impact-BIO-4).

Nursery Sites

Future development associated with the proposed project would have the potential to result in a significant impact on nursery sites. Determining whether 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, the proposed project could result in a potentially significant impact on sensitive natural habitats in the Alpine CPA, and various natural habitats have the potential to include nursery sites. Direct impacts on nursery sites from the proposed project include removal of habitat for future development and infrastructure. Indirect impacts on nursery sites could occur from noise, lighting, changes in drainage patterns, and introduction of pests, domestic animals, and/or invasive species. These impacts can substantially interfere with native wildlife nursery sites.

Federal, State, and Local Regulations and Existing Regulatory Processes

As identified in Section 2.4.2, there are numerous federal, state, and local regulations in place to protect wildlife movement corridors and nursery sites in the County that are also applicable to the Alpine CPU.

The Migratory Bird Treaty Act protects migratory birds and their nesting sites, and places limitations on development during nesting seasons for migratory birds.

Furthermore, the General Plan includes Policy LU-6.7 within the Land Use Element, which requires projects with open space to design contiguous open space areas that protect wildlife habitat and corridors.

The General Plan also includes Policy COS-1.1 within the Conservation Element, which furthers development of a coordinated biological preserve system that includes PAMAs, Biological Resource Core Areas, wildlife corridors, and linkages to allow wildlife to travel throughout their habitat ranges.

Discretionary projects are reviewed for impacts to wildlife movement corridors and nursery sites based on the County's Biological Guidelines and CEQA. Therefore, when subsequent discretionary projects are proposed for development within the Alpine CPA, these projects would be analyzed through the CEQA process for potential impacts related wildlife movement corridors and nursery sites,

Summary of Impacts

As described under Issue 1, because the proposed project would allow for increased density and intensity compared to the current General Plan, associated project activities have the potential to result in greater impacts on sensitive habitats, some of which have the potential to include nursery sites. As such, direct and indirect impacts on wildlife nursery sites associated with the Alpine CPU would be more severe than those identified in the prior EIRs (Impact-BIO-4) and would be **potentially significant**. Mitigation would be required.

2.4.3.5 Issue 5: Conflict with Local Policies and Ordinances

Guidelines for the Determination of Significance

Based on Appendix G of CEQA and the County Guidelines for Determining Significance – Biological Resources, the proposed project would result in a significant impact if it would:

- Conflict with one or more local policies or ordinances protecting biological resources.

Impact Analysis

The prior EIRs determined that future development in undeveloped areas would not result in significant direct and cumulative impacts associated with consistency with local policies and ordinances protecting biological resources.

As discussed in detail above under Issues 1 through 4, future development associated with the Alpine CPU has the potential to significantly impact sensitive biological resources identified for protection under the SCMSCP, Guidelines, RPO, BMO, and/or HLP Ordinance. Future discretionary projects within the adopted MSCP South County Subarea Plan would be subject to the County BMO, while projects outside of the MSCP would be subject to the HLP Ordinance. The County's RPO applies throughout the unincorporated County and requires avoidance of impacts to environmentally sensitive lands from discretionary projects. Future development associated with the proposed project would be required to comply with these ordinances, and demonstrate compliance, when applicable. See Section 2.4.3.6 below for a detailed discussion of the subareas.

Federal, State, and Local Regulations and Existing Regulatory Processes

As identified in Section 2.4.2, there are numerous local regulations in place in the County that are also applicable to the Alpine CPU. Local policies and ordinances define the standards and requirements under which discretionary projects are reviewed. Local policies include the County of San Diego Zoning Ordinance, RPO, BMO, WPO, MSCP, HLP, and County Board of Supervisors Policy-123, which established the Conservation Agreement for the implementation of the MSCP.

Discretionary projects are reviewed for their conformance with all applicable local policies and ordinances pursuant to the County's Biological Guidelines and CEQA. Therefore, when subsequent discretionary projects are proposed for development within the Alpine CPA, these projects would be analyzed through the CEQA process to ensure they do not conflict with any applicable local policies or ordinances.

Summary of Impacts

Because development associated with the proposed project would be required to comply with the aforementioned ordinances and policies protecting biological resources, potential impacts would be **less than significant**. Therefore, potential impacts would be similar to those identified in the prior EIRs.

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

Guidelines for the Determination of Significance

Based on CEQA Appendix G and the County Guidelines for Significance – Biological Resources, the proposed project would result in a significant impact if it would conflict with the provisions of any adopted HCP; NCCP; or other approved local, regional, or state HCP.

Impact Analysis

The prior EIRs determined that future development would not conflict with, nor result in, a cumulatively considerable impact to the provisions of HCPs, local policies, and ordinances, and impacts were concluded to be less than significant. The discussion of impacts related to HCPs, local policies, and ordinances from implementation of the General Plan can be found in Sections 2.4 of the prior EIRs and is incorporated by reference.

The MSCP South County Subarea Plan is the applicable adopted HCP and NCCP for portions of the unincorporated County. The Alpine CPA is partially within the adopted SCMSCP. The following analyzes potential conflicts of the proposed project with the SCMSCP and HLP.

Subareas 1, 2, and 4 are entirely within the SCMSCP boundaries, and Subareas 3, 5, 6, and 7 are partially within the SCMSCP boundaries. The portions of the subareas outside of the SCMSCP boundary would be subject to the HLP Ordinance. PAMA within the subareas of the Alpine CPU is generally avoided with the exception of the locations described below (see Figures 2.4-5a and 2.4-5b).

A habitat linkage and PAMA is identified in the western portion of the Alpine CPA connecting natural resources associated with El Capitan Reservoir to Crestridge Ecological Reserve and other undeveloped lands west and southwest of the Alpine CPA. This is the same area discussed above under Issue 4 and, as mentioned, 14.5 acres would be potentially impacted by future development within the eastern edge of Subarea 4. In addition, another designated PAMA (39 acres) is identified within the southwestern side of Subarea 5, which would similarly be impacted by future development within this area. Development could still occur within these designated PAMAs under the General Plan; however, because the proposed project would allow for greater density within these areas, there is a potential that loss of PAMA would be increased compared to the General Plan. Impacts on PAMA would not constitute a conflict with the provisions of the SCMSCP. See Figures 2.4-4a and 2.4-4b.

Future projects associated with the proposed project would be required to evaluate any potential impacts on biological resources within these areas and mitigate impacts in accordance with the mitigation ratios identified in the BMO. Furthermore, projects located within the boundaries of the adopted SCMSCP are reviewed for consistency with the plan and BMO. MSCP Conformance Findings must be prepared for these projects based on both the SCMSCP and BMO standards. Because future development within the SCMSCP would be required to comply with the BMO and make MSCP Conformance Findings, impacts would be **less than significant**.

Federal, State, and Local Regulations and Existing Regulatory Processes

As identified in Section 2.4.2, there are numerous federal, state, and local regulations in place in the County that are also applicable to the Alpine CPU. A number of HCPs, including the MSCP and the BMO, guide discretionary development within the County.

Also applicable to the Alpine CPU is the NCCP Act of 1991 which established the NCCP program as overseen by CDFW.

Discretionary projects are reviewed for their conformance with all applicable HCPs and NCCPs pursuant to the County's Biological Guidelines and CEQA. Therefore, when subsequent discretionary projects are proposed for development within the Alpine CPA, these projects would be analyzed through the CEQA process to ensure they do not conflict with any applicable HCPs or NCCPs.

Summary of Impacts

Future projects associated with the proposed project would be required to evaluate any potential impacts on biological resources within these areas and mitigate impacts in accordance with the mitigation ratios identified in the BMO. Furthermore, projects located within the boundaries of the adopted SCMSCP are reviewed for consistency with the plan and BMO. MSCP Conformance Findings must be prepared for these projects based on both the SCMSCP and BMO standards. Because future development within the SCMSCP would be required to comply with the BMO and make MSCP Conformance Findings, impacts would be **less than significant**.

2.4.4 Cumulative Analysis

The geographic scope of the cumulative impact analysis for biological resources includes the communities that surround Alpine, including Crest/Dehesa, Lakeside, Cuyamaca, Descanso, Pine Valley, and Jamul/Dulzura because the surrounding communities have somewhat similar character and may also be affected by the land use designation changes. It should be noted that all of these communities were considered under the prior EIRs.

The geographic scope addresses biological resources present within the SCMSCP, which includes all of Subareas 1, 2, and 4, as well as portions of Subareas 3, 5, 6, and 7.

The scope also includes the Viejas Reservation, which is located within the Alpine CPA but is not within the jurisdiction of the County. Additionally, portions of the CNF, including lands owned by the USFS, are incorporated into the geographic scope.

2.4.4.1 Issue 1: Special-Status Plant and Wildlife Species

Growth and development within the cumulative study area could result in cumulative impacts on special-status plant and wildlife species through the loss of sensitive habitat and the special-status species it supports, and in the loss of habitat or edge effects that would significantly impact special-status plant and wildlife species.

As described above in Section 2.4.3.1, Issue 1: Special-Status Plant and Wildlife Species, the land use designations within the proposed project would have the potential to result in the removal of vegetation and habitats that support sensitive species as a result of future development activity. In combination with other cumulative projects, the proposed project would have the potential to result in a significant cumulative impact. Although implementation of General Plan policies identified in Section 2.4.2.1 and

mitigation measures identified in Section 2.4.6.1 would reduce this impact, it cannot be guaranteed that impacts would be reduced below a level of significance.

The cumulative study area includes biological resources present within SCMSCP. A comprehensive NCCP is not in place for the long-term protection of special-status plant and wildlife species outside of the adopted SCMSCP boundaries. Although mitigation would be required and implemented for significant impacts associated with individual projects, a cumulative loss of habitat supporting special-status plant and wildlife species could still occur. As identified in the prior EIRs, effects from future growth and development within the cumulative study area would have the potential to result in a significant cumulative impact.

Development associated with the proposed project, when combined with cumulative growth and development within the cumulative study area, would have the potential to increase habitat loss and impacts on special-status species. Therefore, the proposed project's contribution to this cumulative impact would be **potentially significant** and more severe than the contribution identified in the prior EIRs and would be cumulatively considerable (**Impact-C-BIO-1**).

2.4.4.2 Issue 2: Riparian Habitat and Other Sensitive Natural Communities

A cumulative impact would occur on riparian habitats and sensitive natural communities if development associated with cumulative projected growth within the Alpine CPA or cumulative study area would result in direct and indirect loss or degradation of riparian habitat or other identified sensitive natural communities.

As discussed under Issue 1, this cumulative growth and development would potentially result in the loss of other sensitive habitat that supports special-status species. Cumulative growth and development in adjacent communities, as well as tribal governments and federal and state-managed lands would be required to comply with applicable regulations that provide protections for riparian habitat and other sensitive habitat types. Although mitigation would be required and implemented for significant impacts associated with individual projects, a cumulative loss of riparian and other sensitive habitat supporting special-status plant and wildlife species could still occur. Therefore, cumulative effects from cumulative growth and development would be significant.

Projects located in the geographic scope would have the potential to result in a cumulative impact to riparian habitats and other sensitive natural communities if in combination they would result in loss or degradation of riparian habitat and other sensitive habitat types. As discussed in Section 2.4.3.2, the land use designations within the proposed project would have the potential to result in more severe project-level impacts on riparian habitats. Although implementation of the General Plan policies identified in Section 2.4.2.1 and mitigation measures identified in Section 2.4.6.2 would reduce this impact, it cannot be guaranteed that impacts would be reduced below a level of significance. Therefore, the proposed project's contribution to this cumulative impact would be **potentially significant** and more severe than the contribution identified in the prior EIRs and would be cumulatively considerable (Impact-C-BIO-2).

2.4.4.3 Issue 3: Federally Protected Wetlands

Projects located in the cumulative study area would have the potential to result in cumulative impacts on federally protected and County RPO wetlands. Mitigation measures would be implemented to reduce impacts to wetlands from individual projects associated with growth and development under the

proposed project. Development associated with projected growth within the cumulative study area would be required to comply with applicable federal regulations such as Sections 401 and 404 of the CWA, as well as the County RPO. Existing regulations would further ensure that a significant cumulative impact associated with federally protected and County RPO wetlands would not occur.

The proposed project would result in land use changes that could increase density and intensity of development in areas where federally protected and County RPO wetlands are present. As discussed in Section 2.4.3.3, development associated with the proposed project could have the potential to impact federally protected and County RPO wetlands, and project-level impacts would be more severe than those identified in the prior EIRs. However, implementation of General Plan policies identified in Section 2.4.2.1 and mitigation measures identified in Section 2.4.6.3, as well as mandatory compliance with federal, state, and local regulations, would reduce this project-level impact to less than significant. Because cumulative projects would also be required to comply with federal, state, and local regulations and mitigate for any potential loss of wetlands, the proposed project's contribution to cumulative impacts on federally protected wetlands would be **less than significant** and similar to the contribution identified in the prior EIRs, and would not be cumulatively considerable.

2.4.4.4 Issue 4: Wildlife Corridors and Nursery Sites

Growth and development located in the cumulative study area would have the potential to result in a cumulative impact to wildlife corridors and nursery sites if, in combination, they would result in loss or degradation of wildlife corridors and nursery sites, or, encroach on the existing designated wildlife movement corridor within the western portion of the Alpine CPA. In addition, cumulative growth and development could result in significant impacts on sensitive habitat, where nursery sites are present. Although mitigation would be required and implemented for significant impacts associated with individual projects, a cumulative loss of habitat supporting special-status plant and wildlife species could still occur. Therefore, cumulative effects from growth and development within the cumulative study area would be significant.

The proposed project would result in land use changes that could increase density and intensity of development in areas where wildlife corridors and nursery sites are located. As discussed in Section 2.4.3.4, future development associated with the proposed project would result in less than significant direct and indirect impacts on wildlife corridors, and impacts would be less severe than those identified in the prior EIRs. However, development associated with the proposed project, when combined with cumulative growth and development within the cumulative study area, would result in a greater loss of nursery sites. Therefore, the proposed project's contribution to this impact would be **potentially significant** and more severe than the contribution identified in the prior EIRs and would be cumulatively considerable (Impact-C-BIO-3).

2.4.4.5 Issue 5: Conflict with Local Policies and Ordinances

Projects under the County's jurisdiction are required to comply with applicable local policies and ordinances, such as the SCMSCP, Southern California Coastal Sage Scrub NCCP Process Guidelines, BMO, RPO, and HLP Ordinance, as applicable, for all project approvals. Projects within the boundaries of the adopted SCMSCP would be required to comply with the BMO, while any projects outside of these boundaries would be required to comply with the Southern California Coastal Sage Scrub NCCP Process Guidelines as implemented by the County HLP Ordinance. Additionally, the County's RPO applies throughout the unincorporated County to avoid wetland impacts from discretionary projects. Therefore, because cumulative growth and development within the cumulative study area would be required to

comply with existing County policies and ordinances protecting biological resources, cumulative effects would be less than significant.

As discussed in detail above in Sections 2.4.3.1 through 2.4.3.4, development associated with the proposed project has the potential to significantly impact sensitive plant and animal species, riparian habitat, and other natural communities; however, development associated with the Alpine CPU would be required to comply with the aforementioned ordinances and policies protecting biological resources. Potential project-level impacts would be less than significant and would be similar to those identified in the prior EIRs. Additionally, implementation of General Plan policies would further reduce the potential for development to conflict with local policies and ordinances protecting biological resources. Because cumulative projects would also be required to comply with these policies and ordinances, the proposed project's contribution to cumulative impacts would be **less than significant** and similar to the contribution identified in the prior EIRs and would not be cumulatively considerable.

2.4.4.6 Issue 6: Conflict with Adopted Habitat Conservation Plans and Natural Community Conservation Plans

Projects located in the cumulative study area would have the potential to result in a cumulative impact to adopted HCPs and NCCPs if, in combination, they would conflict with any adopted conservation plans.

Growth and development within the cumulative study area would be required to comply with applicable HCPs or NCCPs, such as the SCMSCP or the Southern California Coastal Sage Scrub NCCP. Cumulative projects within the boundaries of the SCMSCP would be required to evaluate any potential impacts on biological resources within these areas and mitigate impacts in accordance with the mitigation ratios identified in the BMO. Furthermore, projects located within the boundaries of the adopted SCMSCP are reviewed for consistency with the plan and BMO. These cumulative projects would be required to prepare MSCP Conformance Findings based on both SCMSCP and BMO standards. For cumulative projects outside of the SCMSCP boundaries, the Southern California Coastal Sage Scrub NCCP is the applicable plan. Because cumulative growth and development would be required to comply with these plans and programs, cumulative effects would be less than significant.

Increased density and intensity allowed under the proposed project could potentially affect the formation of future preserve areas by fragmenting habitat, especially in predominantly undeveloped areas. As discussed in Section 2.4.3.6, because future development associated with the proposed project would be required to comply with the applicable HCPs and NCCPs, as well as the local policies and ordinances that support them, the proposed project would result in less than significant project-level impacts associated with conflicts with adopted HCPs and NCCPs, similar to the prior EIRs. Additionally, implementation of General Plan policies identified in policies identified in Section 2.4.2.1 would further reduce the potential for proposed project-related development to conflict with adopted HCPs and NCCPs.

Therefore, the proposed project would not contribute to a significant cumulative impact regarding potential conflicts with applicable HCPs and NCCPs and impacts would be **less than significant** and would be similar to the impacts identified in the prior EIRs, and thus would not be cumulatively considerable.

2.4.5 Significance of Impacts Prior to Mitigation

The following summarizes the potentially significant project-level impacts that would result from implementation of the proposed project prior to mitigation:

Impact-BIO-1: Adversely Affect Special-Status Plant and Wildlife Species. Increased density and intensity associated with the proposed project would result in a more severe loss of sensitive habitat and the special-status plant and wildlife species it supports compared to the prior EIRs. This would be considered a significant impact.

Impact-BIO-2: Adversely Affect Riparian Habitat and Other Sensitive Natural Communities. Increased density and intensity associated with the proposed project would result in a more severe loss of riparian habitat and other sensitive natural communities compared to the prior EIRs. This would be considered a significant impact.

Impact-BIO-3: Adversely Affect Federally Protected Wetlands. Increased density and intensity associated with the proposed project would result in a more severe direct loss of federally protected and County RPO wetlands compared to the prior EIRs. This would be considered a significant impact.

Impact-BIO-4: Adversely Affect Wildlife Movement Corridors and Nursery Sites. Increased density and intensity associated with the proposed project would have the potential to result in greater impacts on sensitive habitats, some of which have the potential to include nursery sites. As such, direct and indirect impacts on wildlife nursery sites associated with the Alpine CPU would be more severe than those identified in the prior EIRs. This would be considered a significant impact.

Impact-C-BIO-1: Cumulatively Considerable Contribution to Adverse Effects on Special-Status Plant and Wildlife Species. Future development associated with the Alpine CPU, when combined with cumulative growth and development within the cumulative study area, would increase habitat loss and potential impacts on special-status species. Therefore, the proposed project's contribution to this cumulative impact would be more severe than the contribution identified in the prior EIRs. This impact would be cumulatively considerable.

Impact-C-BIO-2: Cumulatively Considerable Contribution to Adverse Effects on Riparian Habitat and Other Sensitive Natural Communities. Future development associated with the Alpine CPU, when combined with cumulative growth and development within the cumulative study area, would increase riparian habitat loss. Therefore, the proposed project's contribution to this cumulative impact would be more severe than the contribution identified in the prior EIRs. This impact would be cumulatively considerable.

Impact-C-BIO-3: Cumulatively Considerable Contribution to Adverse Effects on Wildlife Corridors and Nursery Sites. Future development associated with the Alpine CPU, when combined with cumulative growth and development within the cumulative study area, would result in a greater loss of nursery sites. Therefore, the proposed project's contribution to this impact would be more severe than the contribution identified in the prior EIRs. This impact would be potentially cumulatively considerable.

2.4.6 Mitigation

2.4.6.1 Issue 1: Special-Status Species

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. In addition, the following prior EIRs and Alpine CPU specific mitigation measures would reduce Impact-BIO-1 and Impact-C-BIO-1, but not below a level of significance. Therefore, these impacts would be **significant and unavoidable**.

Infeasible Mitigation Measures

The following measures were considered in attempting to reduce impacts on visual character or quality to below a level of significance. However, the County determined that these measures would be infeasible, as described below.

Therefore, the following mitigation measures would 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.

  Explanation: This measure is feasible and attainable as the County is currently in the process of preparing such plans. However, these conservation plans require approval at the federal and state levels, which the County cannot guarantee ahead of time. In addition, the timing of these programs (i.e., MSCP adoption and implementation) may not coincide with the proposed project impacts in these areas. Therefore, this measure cannot be considered feasible mitigation for the proposed project.

2011 General Plan and FCI EIR Mitigation Measures

The following prior EIRs mitigation measures are being carried forward and shall apply to the proposed project: Bio-1.1 through Bio-1.7 (see Appendix B). Implementation of these mitigation measures would reduce the proposed project's impacts on special-status species.

Alpine CPU Mitigation Measures

MM-BIO-1: As a part of the discretionary review of subsequent projects proposed under the Alpine CPU, County staff shall review proposed projects to determine if any potentially significant biological resource is present on site. If it is determined that potentially significant biological resources are present on site, compliance with the County's Guidelines for Determining Significance – Biological Resources, shall be required. This may require, pursuant to PDS staff determination, the preparation of a technical report or memorandum that would evaluate the biological of the resource and identify appropriate mitigation measures, as required.

2.4.6.2 Issue 2: Riparian Habitats and Other Sensitive Natural Communities

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. In addition, the following prior EIRs and Alpine CPU specific mitigation measures would reduce Impact-BIO-2 and Impact-C-BIO-2, but not below a level of significance. Therefore, these impacts would be **significant and unavoidable**.

Infeasible Mitigation Measures

See measure and discussion in Section 2.4.6.1 above.

2011 General Plan and FCI EIR Mitigation Measures

The following prior EIRs mitigation measures are being carried forward and shall apply to the proposed project: Bio-2.1 through Bio-2.4 (see Appendix B). Implementation of these mitigation measures would reduce the proposed project's impacts on riparian habitats and other sensitive natural communities

Mitigation measures Bio-1.1 through Bio-1.7 referenced in Section 2.4.6.1 are also applicable to impacts on riparian habitats and other sensitive natural communities.

Alpine CPU Mitigation Measures

See mitigation measure MM-BIO-1 under Issue 1 above.

2.4.6.3 Issue 3: Federally Protected Wetlands

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. In addition, the following prior EIRs and Alpine CPU specific mitigation measures would reduce Impact-BIO-3 to a **less than significant** level.

2011 General Plan and FCI EIR Mitigation Measures

The following prior EIRs mitigation measures are being carried forward and shall apply to the proposed project: Bio-1.1, Bio-1.5 through Bio-1.7, and Bio-2.2 through Bio-2.4. Implementation of these mitigation measures would reduce the proposed project's impacts to federally protected wetlands.

Alpine CPU Mitigation Measures

See mitigation measure MM-BIO-1 under Issue 1 above.

2.4.6.4 Issue 4: Wildlife Movement Corridors and Nursery Sites

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. In addition, the prior EIRs and Alpine CPU specific mitigation measures would reduce Impact-BIO-4 and Impact-C-BIO-3, but not below a level of significance. Therefore, these impacts would be **significant and unavoidable**.

Infeasible Mitigation Measures

See measure and discussion in Section 2.4.6.1 above.

General Plan EIR Mitigation Measures

The following prior EIRs mitigation measures are being carried forward and shall apply to the proposed project: Bio-1.1 through Bio-1.7 and Bio-2.3. Implementation of these mitigation measures would reduce the proposed project's impacts on wildlife movement corridors and nursery sites.

Alpine CPU Mitigation Measures

See mitigation measure MM-BIO-1 under Issue 1 above.

2.4.6.5 Issue 5: Conflict with Local Policies and Ordinances

The proposed project would not result in any new or more severe impacts related to conflicts with local policies or ordinances protecting biological resources. Therefore, impacts would be equivalent or less severe than those analyzed by the prior EIRs and would be **less than significant**. No mitigation measures would be required.

2.4.6.6 Issue 6: Conflict with Habitat Conservation Plans and Natural Community Conservation Plans

The proposed project would not result in any new or more severe impacts related to conflicts with HCPs and NCCPs. Therefore, impacts would be equivalent or less severe than those analyzed by the prior EIRs and would be **less than significant**. No mitigation measures would be required.

2.4.7 Conclusion

2.4.7.1 Issue 1: Special-Status Species

Development allowed under the proposed project could have the potential to directly and indirectly result in the loss of special-status species and sensitive habitat. Because the proposed project would allow for greater density and intensity of development compared to the General Plan, impacts would be more severe than those identified in the prior EIRs and would be significant (Impact-BIO-1). Additionally, when combined with growth and development within the cumulative study area, the proposed project's contribution to this cumulative impact would be more severe than the contribution identified in the prior EIRs and **would be cumulatively considerable** (Impact-C-BIO-1). Implementation of the General Plan policies identified in Section 2.4.2.1 and mitigation measures identified in Section 2.4.6.1, in addition to compliance with applicable regulations, would reduce impacts on special-status species and sensitive habitat but not below a level of significance for the reasons described above. Therefore, these impacts would be **significant and unavoidable**.

2.4.7.2 Issue 2: Riparian Habitats and Other Sensitive Natural Communities

Development allowed under the proposed project could have the potential to directly and indirectly result in the loss of riparian habitat. Because the proposed project would allow for greater density and intensity of development compared to the General Plan, impacts would be more severe than those identified in the prior EIRs and would be significant (Impact-BIO-2). Additionally, when combined with growth and development within the cumulative study area, the proposed project's contribution to this cumulative impact would be more severe than the contribution identified in the prior EIRs **and would be cumulatively considerable** (Impact-C-BIO-2). Implementation of the General Plan policies identified in Section 2.4.2.1 and mitigation measures identified in Section 2.4.6.2, in addition to compliance with applicable regulations, would reduce impacts on riparian habitat and other sensitive natural communities but not below a level of significance for the reasons described above. Therefore, these impacts would be **significant and unavoidable**.

2.4.7.3 Issue 3: Federally Protected Wetlands

Development allowed under the proposed project could have the potential to directly and indirectly result in the loss of federally protected wetlands and would result in a more severe potentially significant impact

than those identified in the prior EIRs. However, for the reasons described above, implementation of the General Plan policies identified in Section 2.4.2.1 and mitigation measures identified in Section 2.4.6.3, as well as compliance with federal, state, and local regulations, would reduce this project-level impact to **less than significant** (Impact-BIO-3). In addition, because cumulative growth and development would also be required to comply with federal, state, and local regulations and mitigate for any loss of wetlands, the proposed project's contribution to cumulative impacts on federally protected and County RPO wetlands would be similar to the contribution identified in the prior EIRs, and **would not be cumulatively considerable**.

2.4.7.4 Issue 4: Wildlife Movement Corridors and Nursery Sites

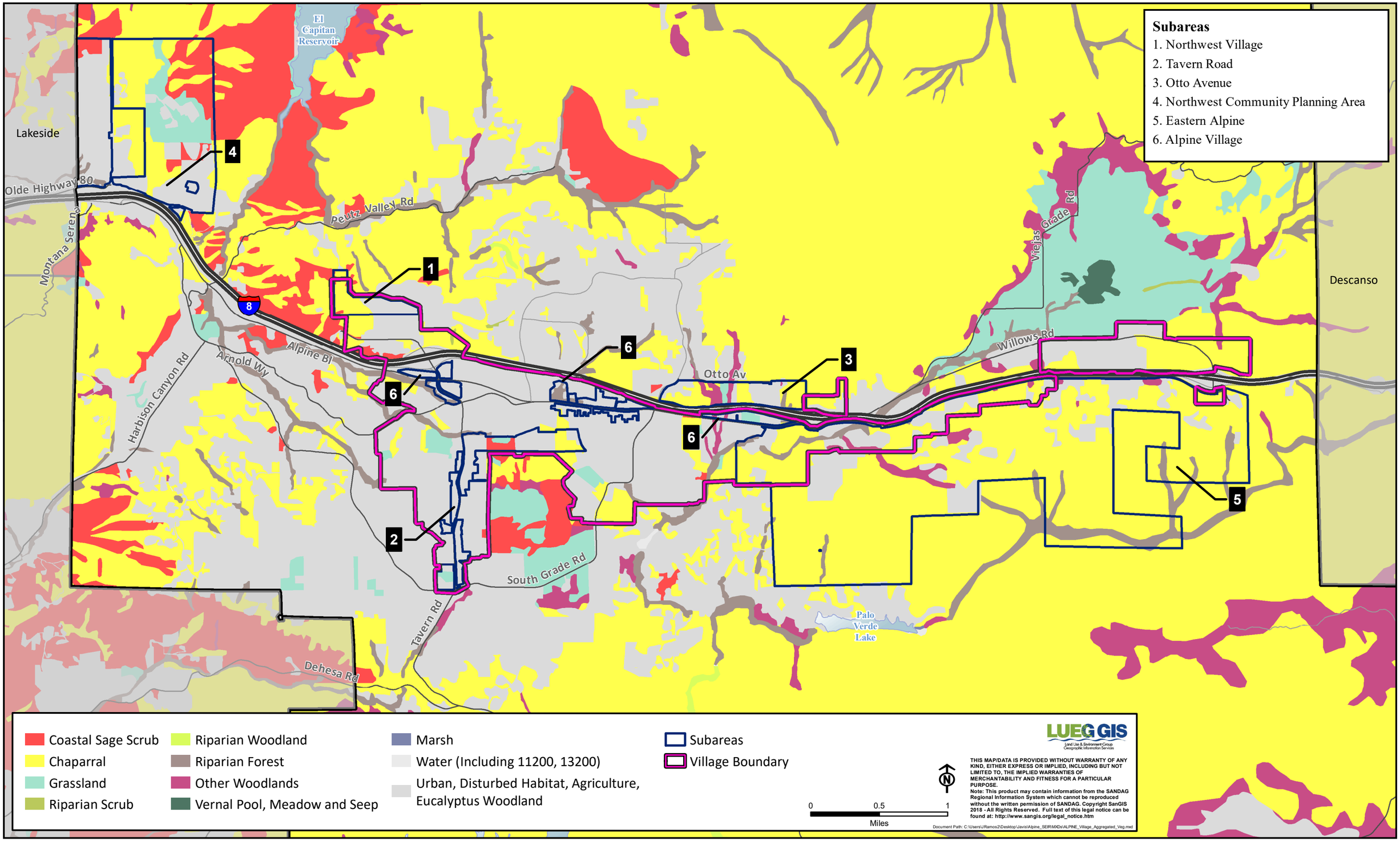
Development allowed under the proposed project could have the potential to directly and indirectly result in the loss of nursery sites. Because the proposed project would allow for greater density and intensity of development compared to the General Plan, impacts would be more severe than those identified in the prior EIRs and would be significant (Impact-BIO-4). Additionally, when combined with growth and development within the cumulative study area, the proposed project's contribution to this cumulative impact would be more severe than the contribution identified in the prior EIRs and **would be cumulatively considerable** (Impact-C-BIO-3). Implementation of the General Plan policies identified in Section 2.4.2.1 and mitigation measures identified in Section 2.4.6.4, in addition to compliance with applicable regulations, would reduce impacts on nursery sites but not below a level of significance for the reasons described above. Therefore, these impacts would be **significant and unavoidable**.

2.4.7.5 Issue 5: Conflict with Local Policies and Ordinances

Implementation of the proposed project would not conflict with any local policies or ordinances that protect biological resources, and project-level impacts would be **less than significant**. Additionally, the proposed project would not contribute to a significant cumulative impact. As such, cumulative impacts **would not be cumulatively considerable**. The proposed project impacts would be equivalent or less severe than those analyzed by the prior EIRs which were less than significant, and no new or more severe impacts would occur.

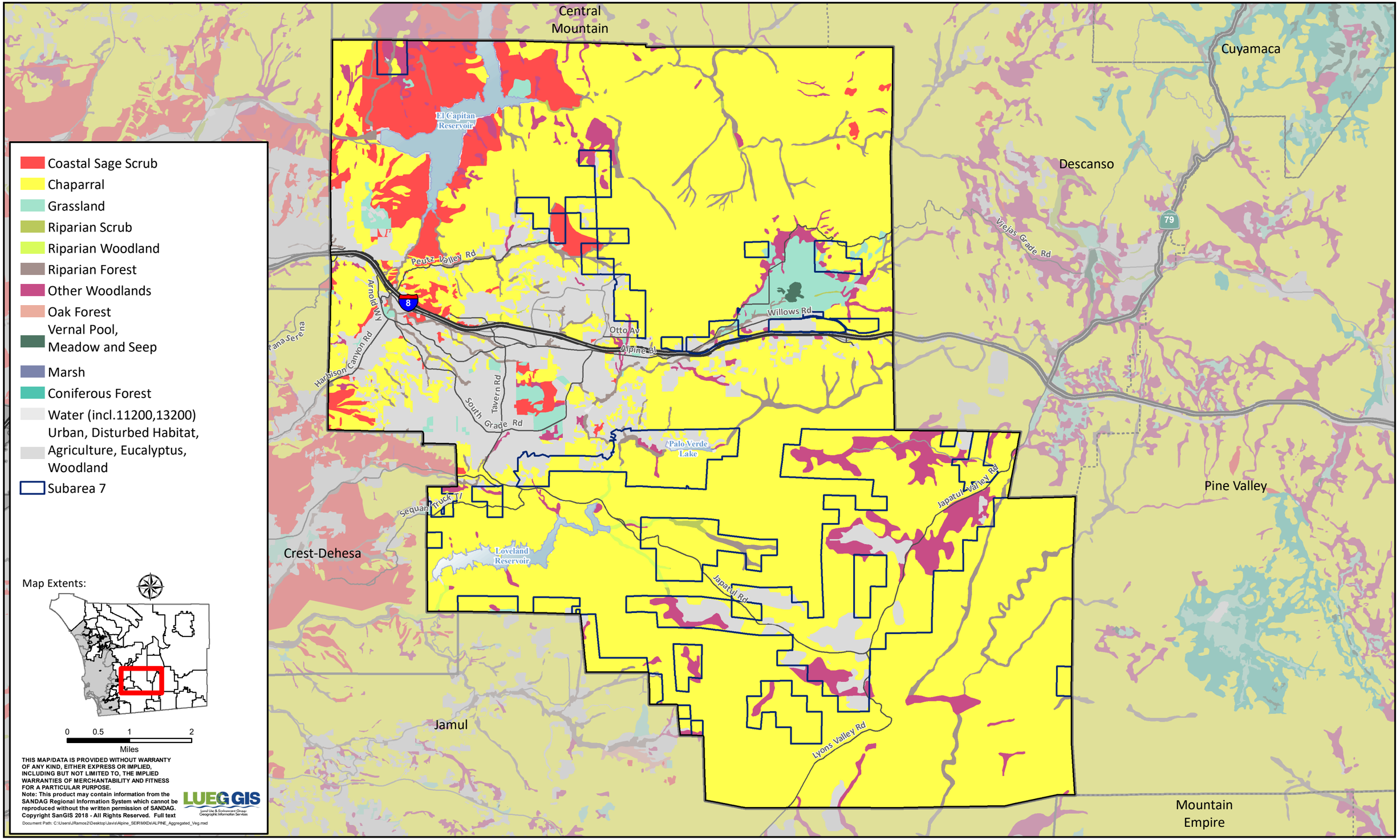
2.4.7.6 Issue 6: Conflict with Habitat Conservation Plans and Natural Community Conservation Plans

Implementation of the proposed project would not conflict with any HCP or NCCPs, and project-level impacts would be **less than significant**. Additionally, the proposed project would not contribute to a significant cumulative impact. As such, cumulative impacts **would not be cumulatively considerable**. The proposed project impacts would be equivalent or less severe than those analyzed by the prior EIRs, which were less than significant, and no new or more severe impacts would occur.



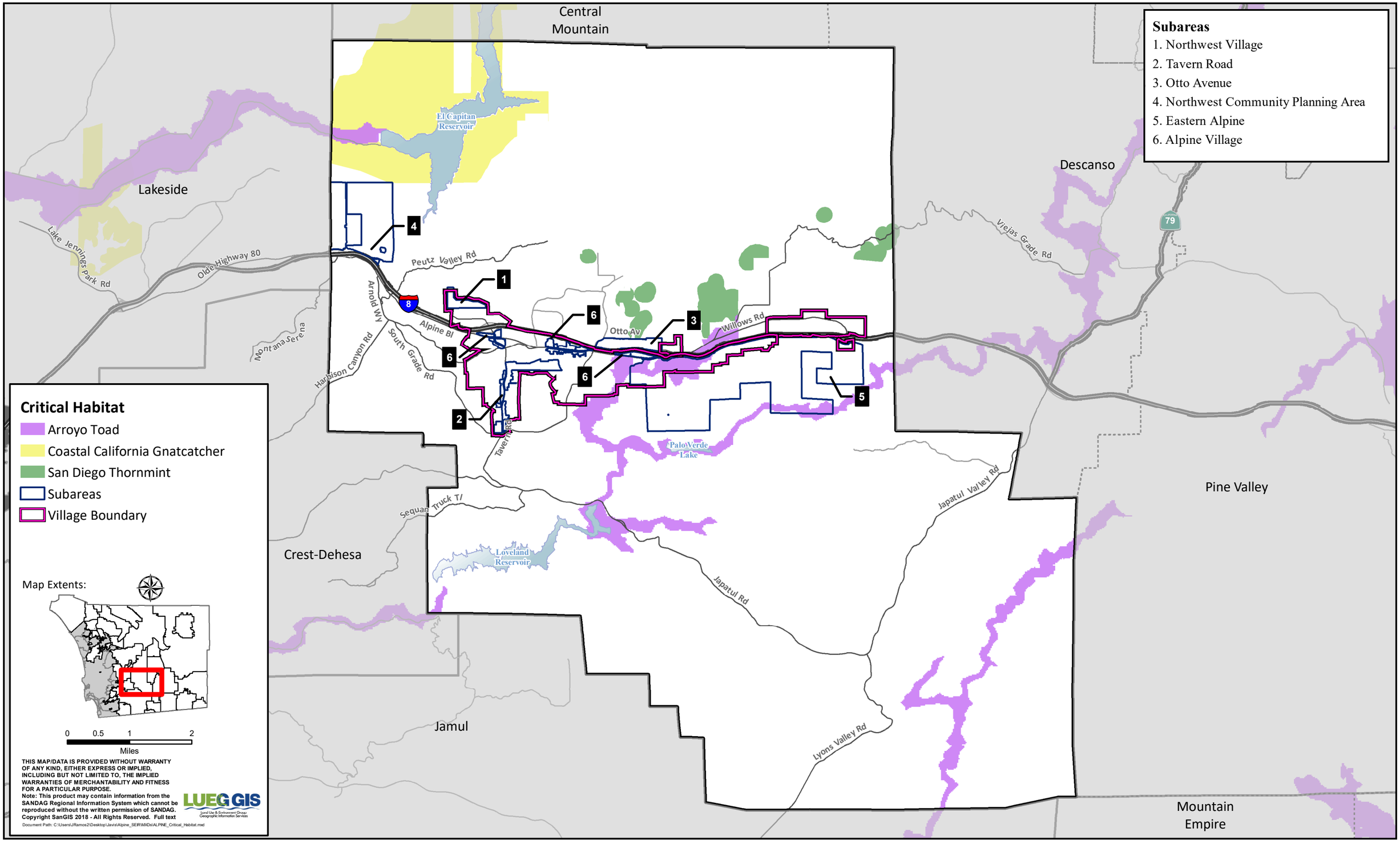
Source: SanGIS, County of San Diego, 2020

Figure 2.4-1a
Existing Aggregated Vegetation Communities in the Alpine Subareas 1-6



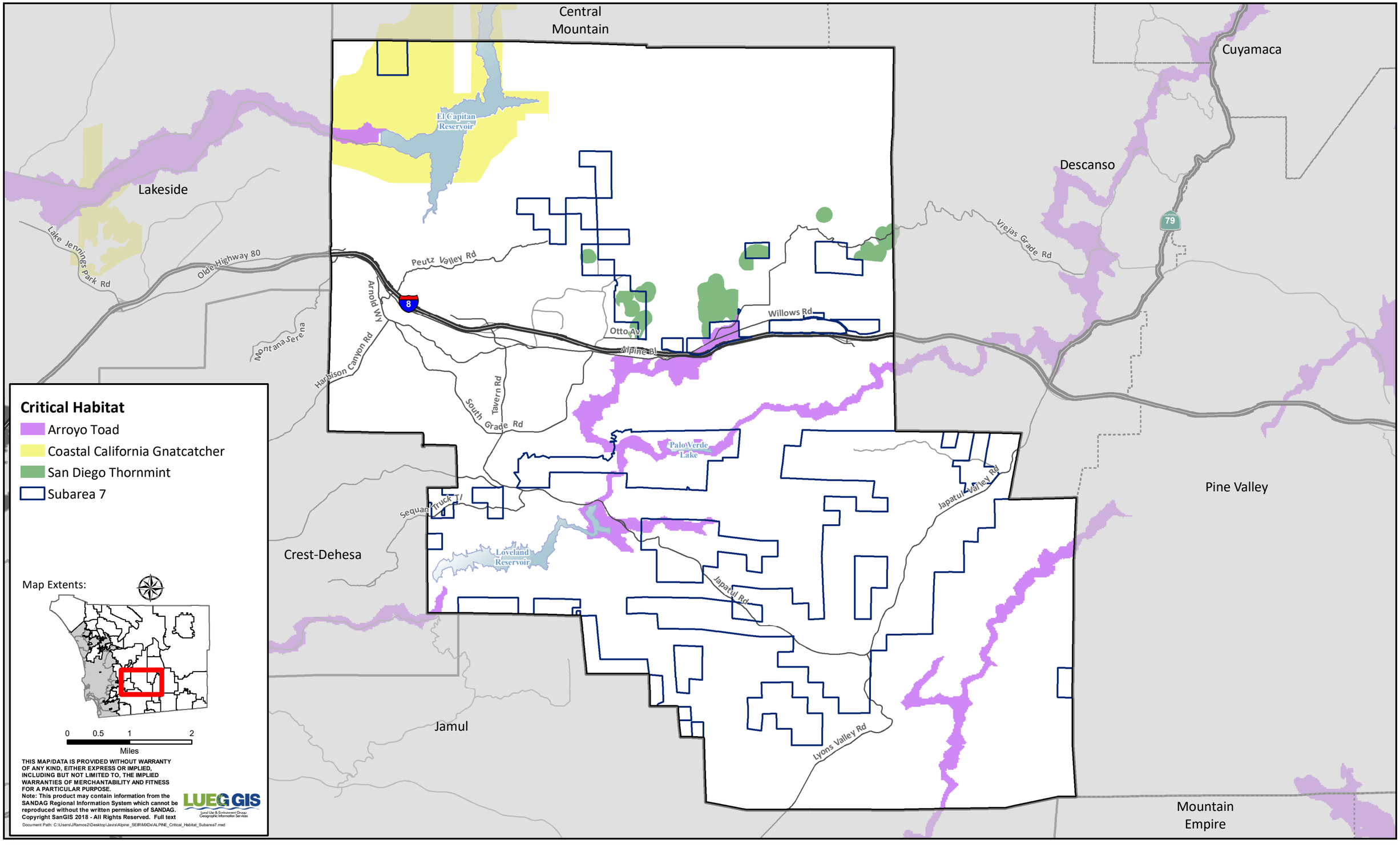
Source: SanGIS, County of San Diego, 2020

Figure 2.4-1b
Existing Aggregated Vegetation Communities in the Alpine Subarea 7



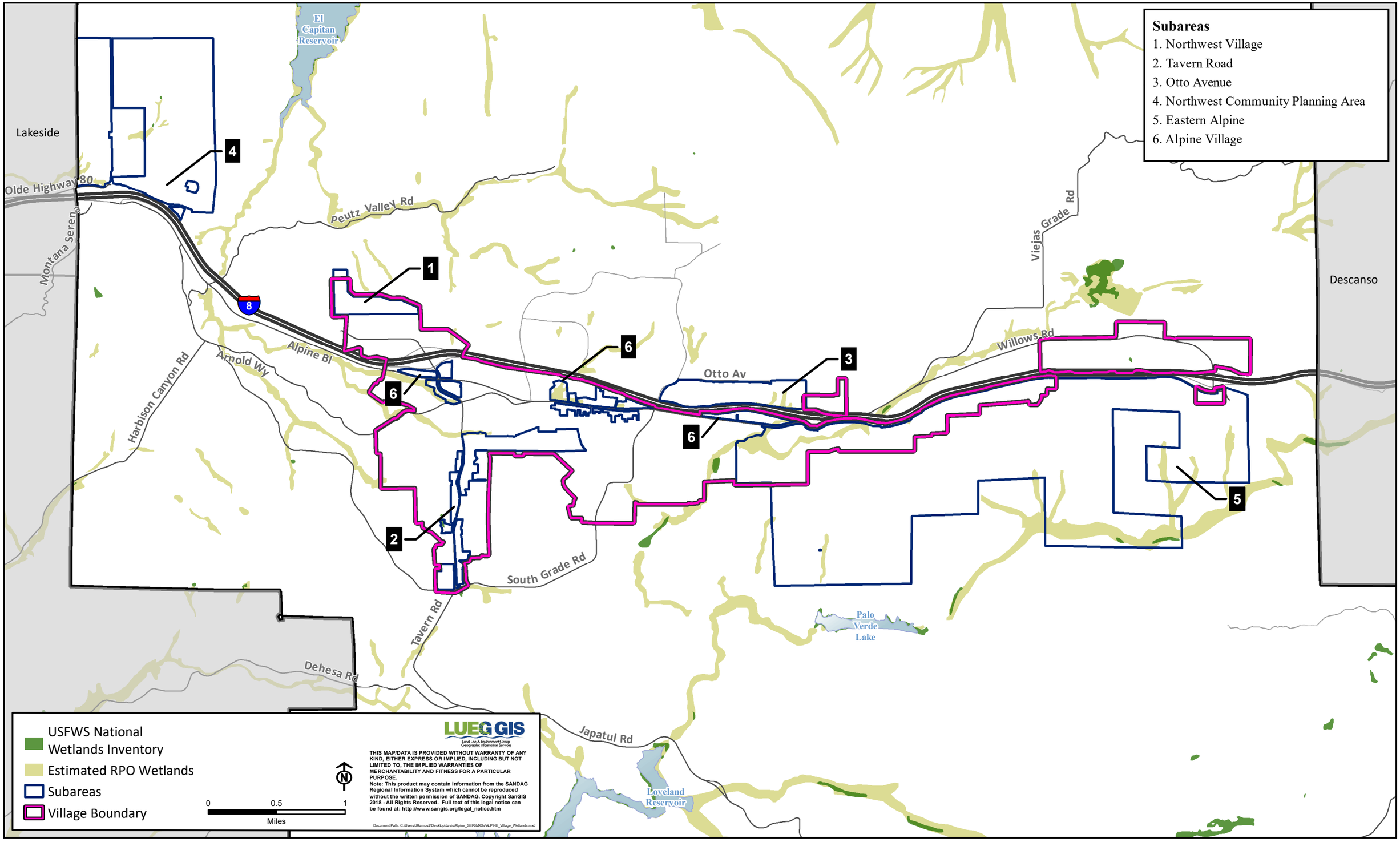
Source: SanGIS, County of San Diego, 2019

Figure 2.4-2a
Critical Habitat
Subareas 1-6



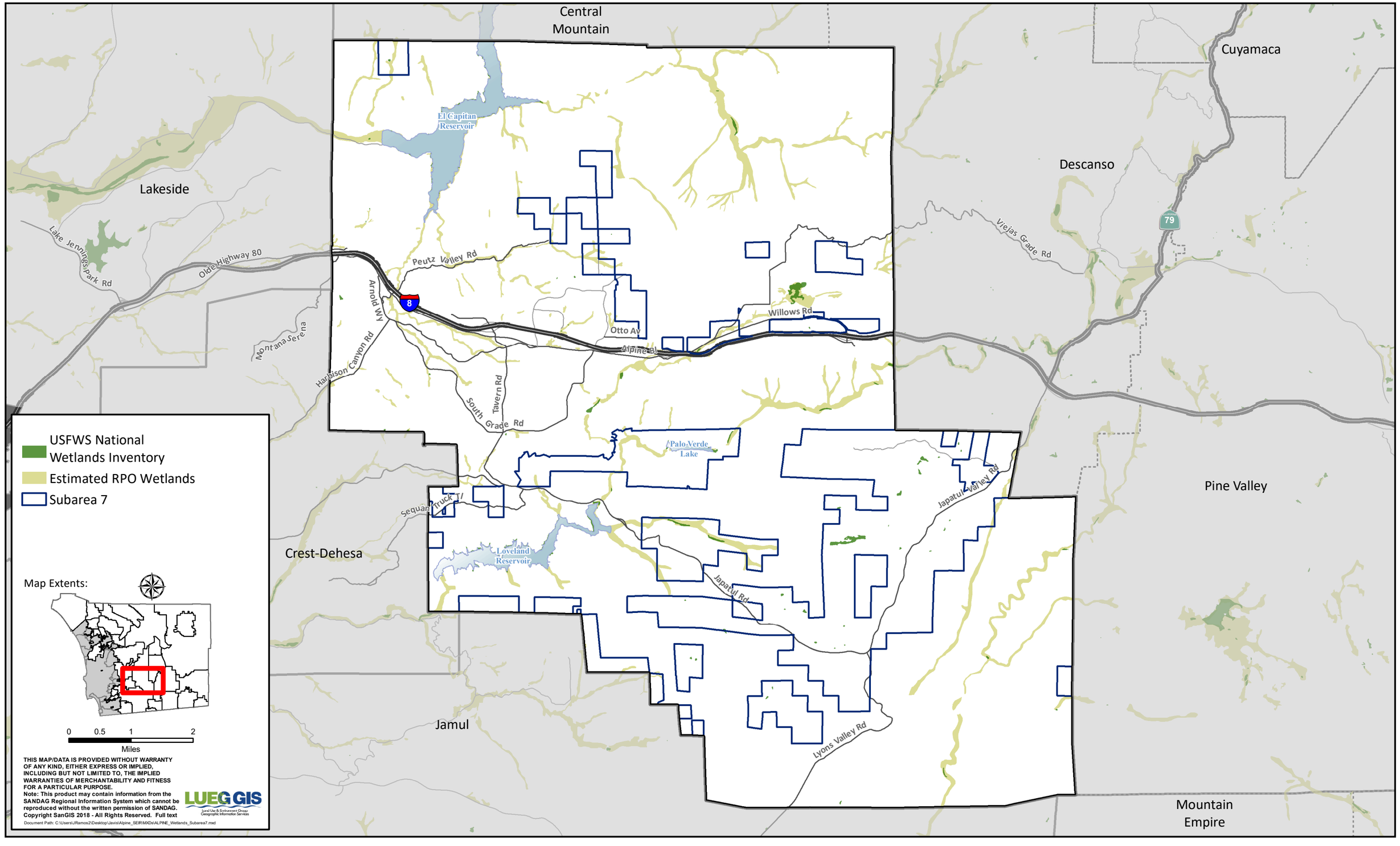
Source: SanGIS, County of San Diego, 2019

Figure 2.4-2b
Critical Habitat
Subarea 7



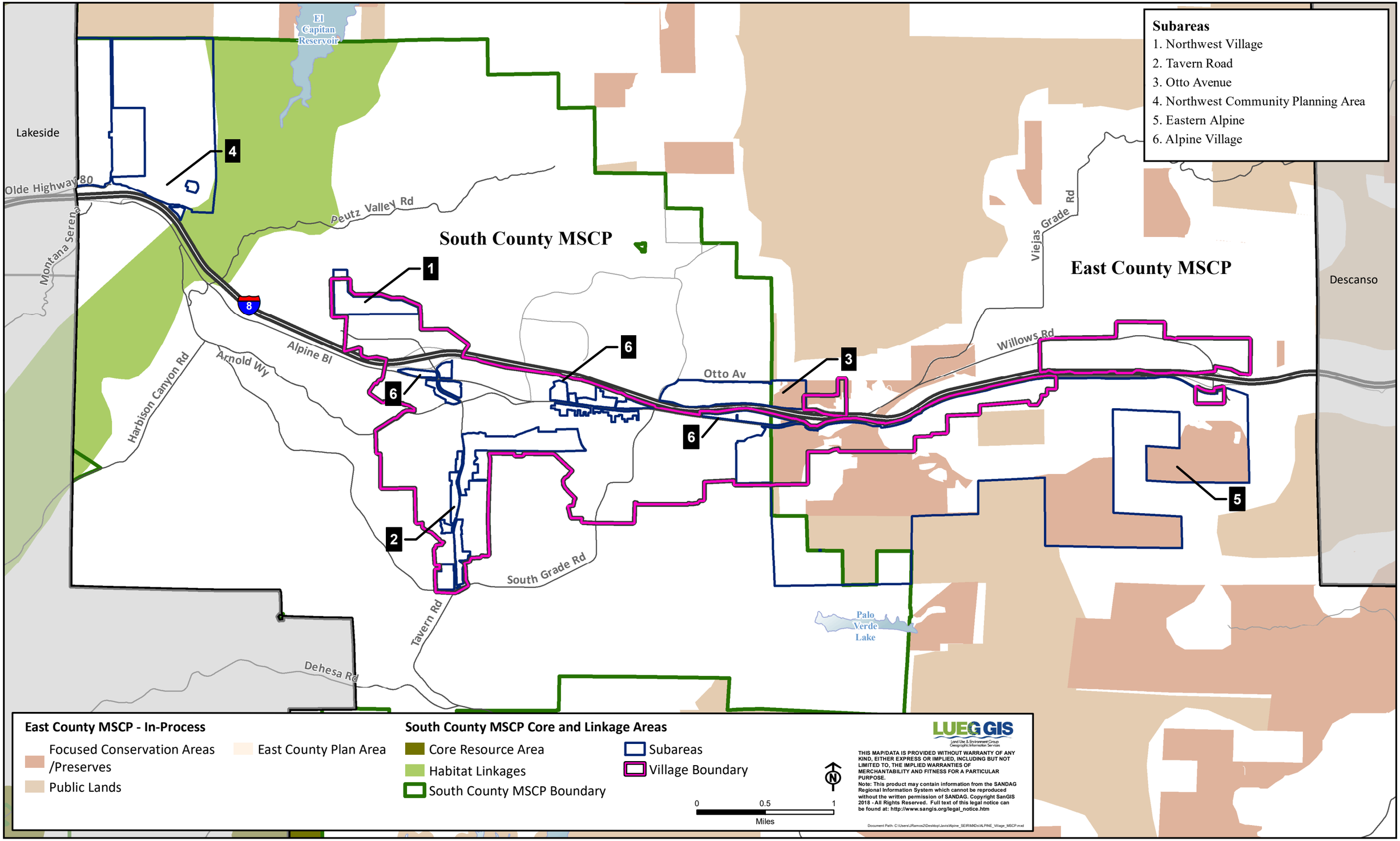
Source: SanGIS, County of San Diego, 2020

Figure 2.4-3a
Wetlands
Subareas 1-6



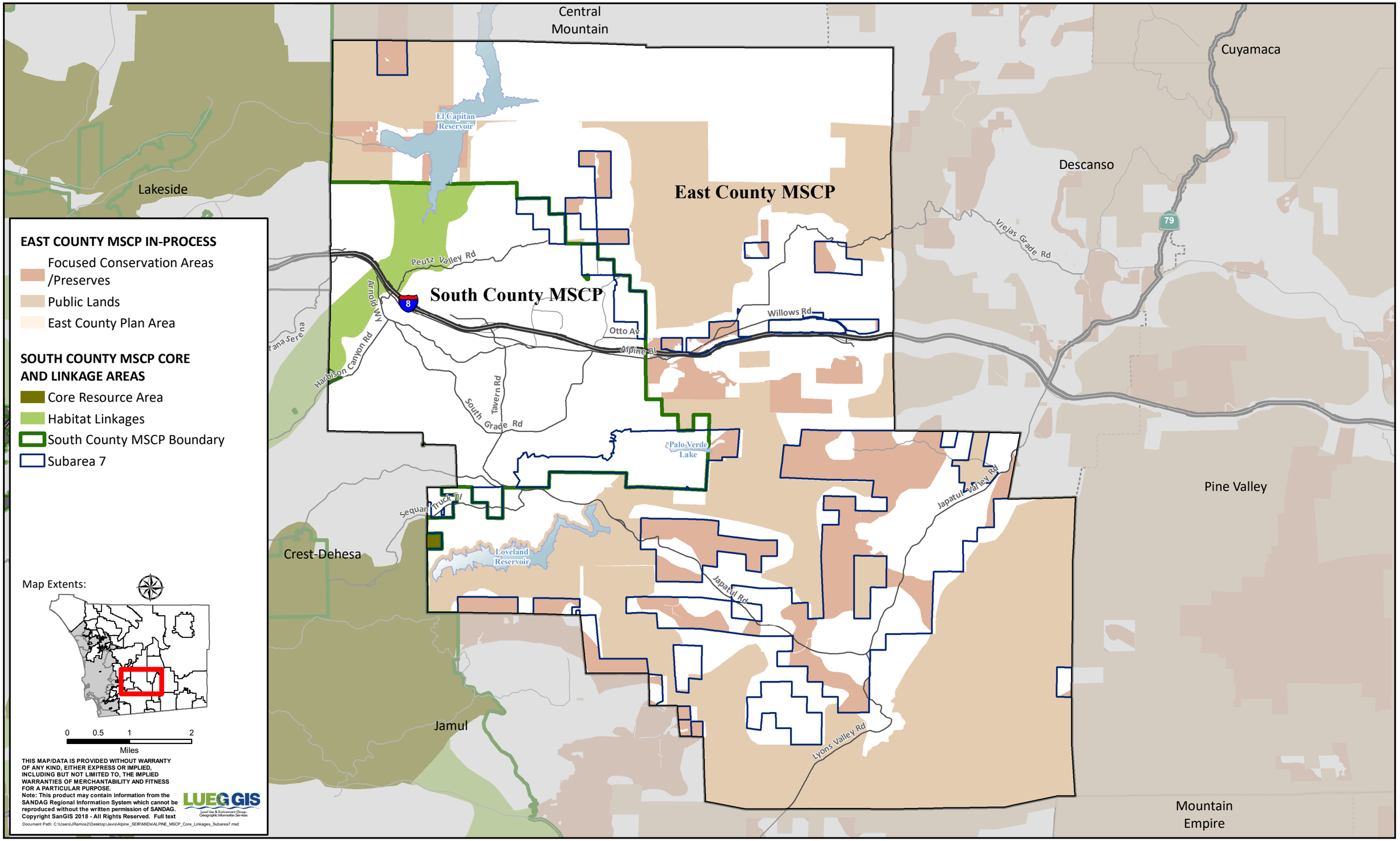
Source: SanGIS, County of San Diego, 2020

Figure 2.4-3b
Wetlands
Subarea 7



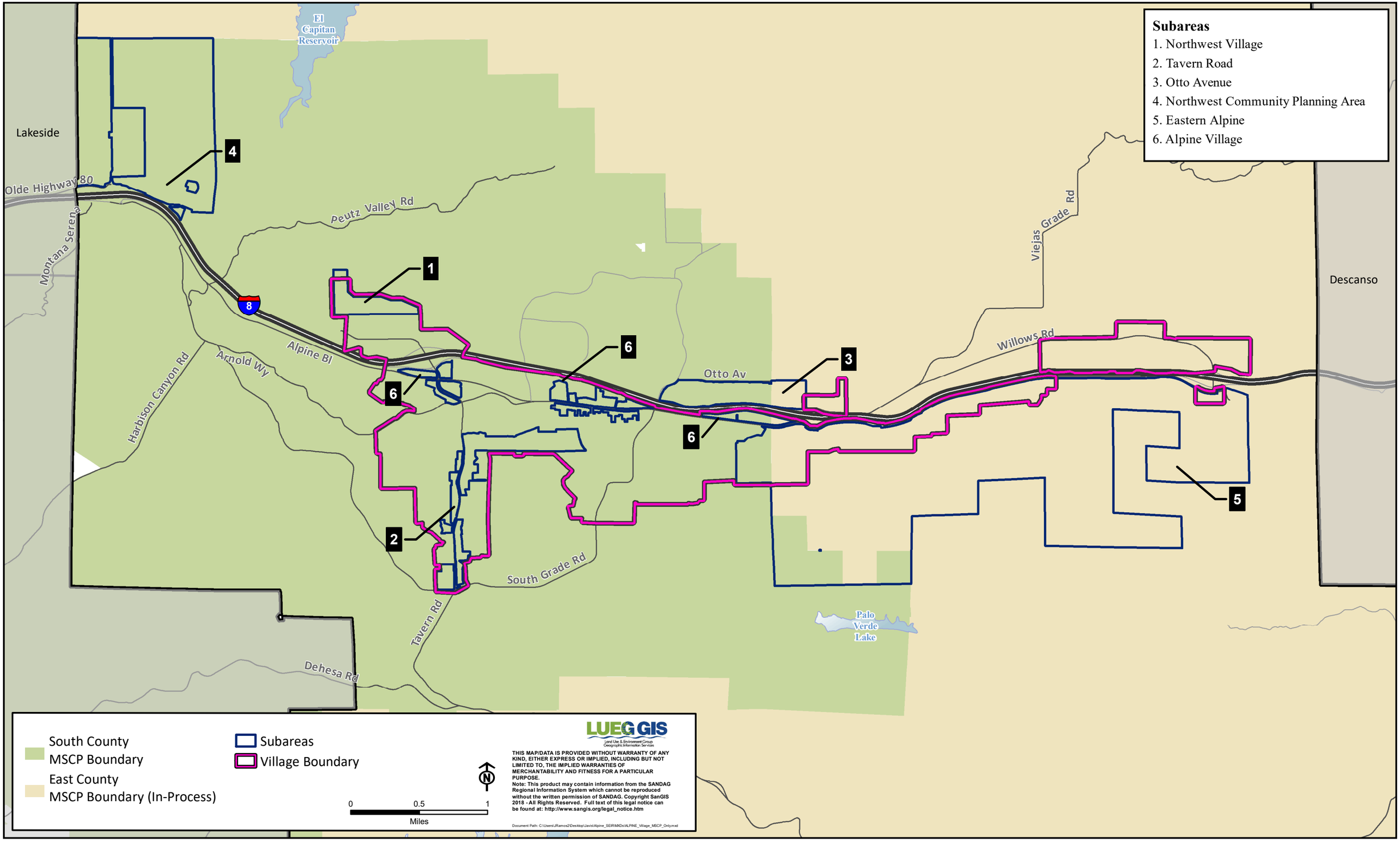
Source: SanGIS, County of San Diego, 2020

Figure 2.4-4a
Habitat Linkages
Subareas 1-6



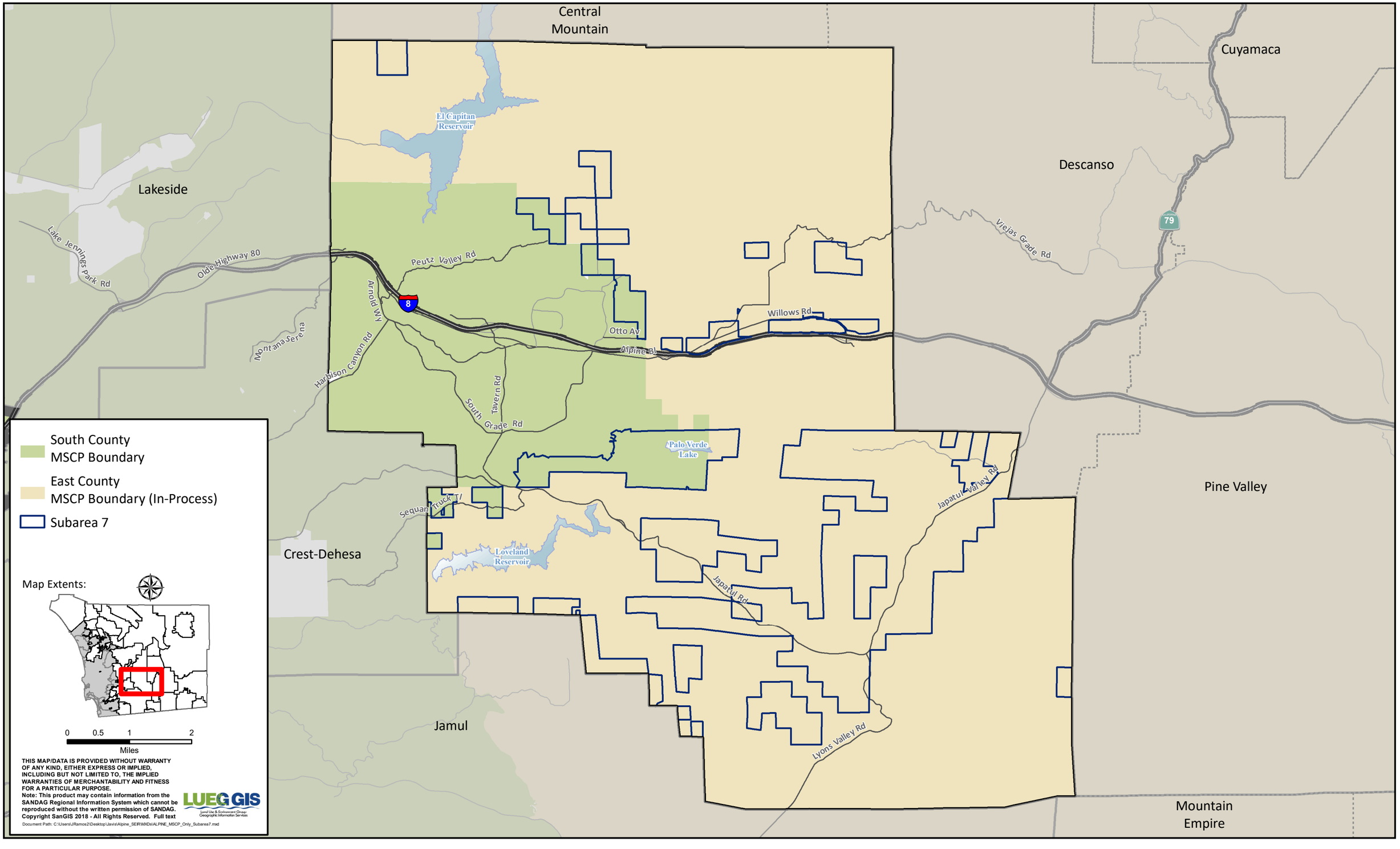
Source: SanGIS, County of San Diego, 2020

Figure 2.4-4b
Habitat Linkages
Subarea 7



Source: SanGIS, County of San Diego, 2020

Figure 2.4-5a
Multiple Species Conservation Program (MSCP) Boundaries
Subareas 1-6



Source: SanGIS, County of San Diego, 2020

Figure 2.4-5b
Multiple Species Conservation Program (MSCP) Boundaries
Subarea 7