Appendix $\frac{DE}{D}$

Biological Resource Core Area Analysis

With respect to Biological Resource Core Areas (BRCAs), the Proposed Project Amendment's impacts on BRCAs would be virtually the same as those of the Approved Project. Specifically, like the Approved Project, the Proposed Project Amendment would not result in "significant degradation" of any BRCA, which Section 4.3.2.1 of the County MSCP Subarea Plan defines "as impacts to 25 percent or more of a BRCA." Using SANGIS land use data, the amount of development that currently exists within each of the three BRCAs as of September 5, 2017, was calculated, and then those data were combined with the Approved Project's impacts to determine how much of each BRCA would be affected after Project construction (Table A). The results show that the Approved Project, when combined with current development and adjacent future development (i.e., Village 13), will not exceed the 25 percent "significant degradation" threshold for the Jamul Mountains, Sweetwater, or Otay Lakes BRCA. These data demonstrate that the Approved Project, even when coupled with total development to date, will not impede the conservation goals for each BRCA as specifically set forth in the MSCP Table 3-2 (see MSCP page 3-17). The same exercise was completed for the Proposed Project Amendment (Table A). Impacts within the Jamul Mountains BRCA are reduced by the Proposed Project Amendment while impacts to the Sweetwater BRCA remain the same and impacts within the Otay Lakes BRCA increase slightly.

Table A. MSCP Plan Biological Resource Core Area Impacts as of 2017 (Acres)

Total Development Based on September 2017 SANGIS Data	Permanent Impacts	Village 13 GDP/SRP Development Footprint	Total Development Impacts	Percent of BRCA Conserved	Percent of BRCA Impacted			
Approved Project								
Jamul Mountains BRCA								
19	444	94	557	93%	7%			
Sweetwater Reservoir/San Miguel Mountain/Sweetwater River BRCA								
1,495	86	0	1,581	88%	12%			
Otay Lakes/Otay Mesa/Otay River Valley BRCA								
2,400	4	668	3,072	82%	18%			
Proposed Project Amendment								
Jamul Mountains BRCA								
19	402	94	515	94%	6%			
Sweetwater Reservoir/San Miguel Mountain/Sweetwater River BRCA								
1,495	86	0	1,581	88%	12%			
Otay Lakes/Otay Mesa/Otay River Valley BRCA								
2,400	7	668	3,075	82%	18%			

Notes: GDP/SRP = General Development Plan/Subregional Plan; BRCA = Biological Resource Core Area.

- To make an adequate comparison, areas designated as disturbed, agriculture, and developed land were removed from the
 total development to date, Approved Project and Proposed Project Amendment Permanent Impacts and Village 13 GDP/SRP
 development footprint.
- Development to date is based on the 2017 SANDAG land use data. Land uses categorizes which are not considered in the development to date include: open space park or preserve, undevelopable natural area, vacant and undeveloped land, and other recreation low.
- Development for Village 13 is based on the GDP/SRP proposed development and MSCP Preserve.

Specifically: "...a project would be considered inconsistent if it would result in... significant degradation of the biological value of a biological resource core area, "core linkage" or "constrained linkage" as defined in the Biological Mitigation Ordinance. The habitat value of a biological core resource area is significantly degraded if 25 percent of the biological core area (500 acres or more in size) is impacted."



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