2.0 ENVIRONMENTAL EFFECTS FOUND TO BE SIGNIFICANT

Effects found to be significant during the EIR preparation process are Biological Resources; Cultural Resources; Global Climate Change; Land Use and Planning Noise; Tribal Cultural Resources; and Transportation. These topics are analyzed in Chapter 2.0.

2.1 Biological Resources

The analysis contained in this section is based on a Biological Technical Report prepared for the Project by Alden Environmental, Inc. (herein, "Alden") located in *Appendix B* of this EIR (Alden, 2024). This section describes, at a project-level, the existing biological resources on and adjacent to the Project site and the governing plans and policies relating to biological resources; identifies guidelines for determining the significance of biological impacts; evaluates potential Project effects, including cumulative effects, on biological resources; and identifies feasible mitigation measures. A Notice of Preparation (NOP) for the Project was released for public review on September 1, 2022 and an EIR Scoping Meeting was held on September 20, 2022. Seven comment letters related to biological resources were received. The Endangered Habitats League (received September 9, 2022) requested that the Project be clustered in the least sensitive location to the maximum extent possible, be evaluated for consistency with the North County MSCP, and impacts be fully mitigated. Jodi Rowin (received September 23, 2022) requested that the EIR evaluate impacts due to the removal of wildlife corridors and open space. Jerry Block (received September 27, 2022) requested that the EIR evaluate impacts on protected biological resources due to an increase in population. The California Department of Fish and Wildlife (CDFW) (received October 3, 2022) requested the EIR incorporate prior CDFW scoping efforts, include in-perpetuity preservation of mitigation lands, and in-perpetuity management and protection of mitigation lands. Jay Petrek (received October 3, 2022) requested that the EIR include provisions for ensuring the viability of on-site species. The Sierra Club (received October 3, 2022) requested that the EIR address how the Project's proposed biological open space areas relate to the conservation areas in the surrounding areas, highlight linkages/wildlife corridors, and address restoration of coastal sage scrub. The Escondido Creek Conservancy (received October 2, 2022) requested that the Project implement maximum mitigation ratios be implemented, that the EIR addresses impacts to California Gnatcatcher Core areas, and that mitigation addresses wildlife movement and rare and threatened species.

2.1.1 Existing Conditions

2.1.1.1 Existing Setting

The Project site is characterized by a topographic saddle in the northerly/northeasterly portion of the site with relatively broad low-relief drainages flowing to the northwest and southeast. Elevations within the overall site limits range from a low elevation of 490 above mean sea level (amsl) in the southeastern drainage to a high of 930 amsl near the southwestern property limit, as shown on Figure 1-11. Under existing conditions, the Project site is undeveloped and includes several unimproved dirt roads and trails.

The northern portion of the site was subject to previous disturbance and was used as a laydown yard for construction equipment. Additionally, a portion of the western area of the site was used for agricultural uses. The site has a long history of disturbance, with clearing and construction-related activities visible in historic aerial imagery as far back as 1947 through the 2000s. (Alden, 2024)

Information pertaining to the biological resources on the Project site was accumulated through field investigations conducted by Alden in 2014 and 2020, as well as from a review of the California Natural Diversity Database (CNDDB), the United States Fish and Wildlife Service (USFWS) database, and the SanBIOS database. This information was compiled and reviewed prior to biological field surveys. Detailed information, including survey methodologies, can be found in *Appendix B* to this EIR. (Alden, 2024)

Vegetation communities were mapped within the Project site and a 100-foot perimeter surrounding the Project site. Additionally, a special status plant species survey, surveys for the coastal California gnatcatcher (CAGN; *Polioptila californica californica*), Crotch's bumble bee (CBB; *Bombus crotchii*) and burrowing owl (BUOW; *Athene cunicularia*), and a habitat assessment for the Hermes copper butterfly (*Lycaena Hermes*) were conducted in June 2020. (Alden, 2024)

The Project site is dominated by non-native grassland and Mafic southern mixed chaparral. In total, nine distinct vegetation communities were mapped within the Project site: coastal sage scrub, disturbed coastal sage scrub, scrub oak chaparral, mafic chamise chaparral, mafic southern mixed chaparral, non-native grassland, eucalyptus woodland, disturbed habitat, and developed and ornamental habitat. Areas associated with the off-site proposed improvements, a total of ~~1.2~~ 1.3 acres, consist of three vegetation communities: coastal sage scrub, disturbed habitat, and developed and ornamental habitat. Developed and ornamental land is the predominant land cover type within the off-site area. (Alden, 2024)

As shown in Table 2.1-1, *Existing Vegetation Communities/Habitat Types*, coastal sage scrub was subdivided as non-disturbed versus disturbed depending on the percent native shrub cover and dominance of nonnative species. The distribution of mapped vegetation communities is depicted in Figure 2.1-1, *Project Vegetation Communities and Sensitive Resources/Impacts*. Details regarding distribution and species composition of mapped vegetation communities are provided in *Appendix B.*

2.1.1.2 Special Status Species

For the purposes of this EIR, special-status species include the following:

- Species listed (or proposed for listing) under the FESA or CESA
- Species protected under other State or federal regulations (e.g., California Fish and Game Code Sections 3503 and 3512, MBTA)\
- Wildlife species identified by CDFW as Species of Special Concern (SSC)
- Plant species ranked by the California Native Plant Society (CNPS)
- Species considered sensitive by the County of San Diego (i.e., plants included on County Lists A through D and wildlife included in County Groups 1 or 2)

- Species covered by the Final Multiple Species Conservation Program MSCP Plan (see Table 3-5 of the MSCP Plan [MSCP 1998])

Focused surveys for special-status plant and wildlife species were conducted per appropriate protocols in 2020 as described in *Appendix B.*

Special-Status Plant Species

Four special-status plant species were confirmed to be located on the Project site. The plant species detected were Orcutt's brodiaea (*Brodiaea orcuttii*), Southwestern spiny rush (*Juncus acutus* ssp. *leopoldii*), Nuttall's scrub oak (*Quercus dumosa*), and Ashy spike-moss (*Selaginella cinerascens*). (Alden, 2024)

Appendix J of the Project's Biological Technical Report in *Appendix B* to this EIR includes a list of potentially occurring special-status plant species that were not recorded during focused plant surveys. Other than the four species listed above that were found to be present on the site, the remaining species were determined to have low potential to occur or are not expected to occur.

Special-Status Wildlife Species

Five special-status animal species were recorded on the Project site during focused surveys conducted in 2020 and 2023. The site supports two federally listed animal species: the Coastal California gnatcatcher (*Polioptila californica californica*) and the Least Bell's vireo *(Vireo bellii pusillus)*. Additionally, the site supports three State listed animal species: Western spadefoot toad (*Spea hammondii*), Cooper's hawk (*Accipiter cooperii*), and Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*). Burrowing owl and CBB were not found during focused surveys. (Alden, 2024)

CDFW listed species with moderate potential to occur on the Project site are the coast horned lizard (*Phrynosoma coronatum*), the coast patch-nosed snake (*Salvadora hexalepis virgultea*), the coastal whiptail (*Salvadora hexalepis virgultea*), the two-stripe garter snake (*Thamnophis hammondii*), the Dulzura pocket mouse (*Chaetodipus californicus*), the Mexican long-tounged bat (*Choeronycteris mexicana*), the San Diego black-tailed jackrabbit (*Lepus californicus bennettii*), the San Diego desert woodrat (*Neotoma lepida intermedia*), and the western mastiff bat (*Eumops perotis*). Species considered sensitive by the County of San Diego only (i.e., species identified by the County of San Diego as Group 1 or Group 2 and not identified with special status by USFWS or CDFW) are the Bell's sage sparrow (*Artemisiospiza bell*), the California horned lark (*Eremophila alpestris actia*), the red-shouldered hawk (*Buteo lineatus)*, and the turkey vulture (*Cathartes aura*). (Alden, 2024)

In total, 56 species of birds were observed or detected on the site, and the site supports a variety of shrubland, grassland, and eucalyptus woodland habitats that are expected to support year-round foraging and breeding season nesting of migratory birds. All migratory bird species that are native to the United States or its territories are protected under the federal Migratory Bird Treaty Act (MBTA).

In common practice, the MBTA is used to place restrictions on disturbance of active bird nests during the nesting season (generally February 1 to September 1). In addition, the USFWS commonly places restrictions on disturbances allowed near active raptor nests. As a standard condition, the Project must comply with the MBTA. (Alden, 2024)

2.1.1.3 Jurisdictional Wetlands and Waterways

During the field visits, the Project site was inspected for potential wetland resources potentially subject to U.S. Army Corps of Engineers (Corps) jurisdiction pursuant to Section 404 of the Clean Water Act (CWA; 33 USC 1344), streambed habitats potentially subject to CDFW jurisdiction pursuant to Sections 1600 *et seq.* of California Fish and Game Code, and surface waters potentially subject to permitting from the Regional Water Quality Control Board (RWQCB). The effort also included determining the presence or absence of potential County Resource Protection Ordinance (RPO) wetlands. (Alden, 2024)

During the field visits, a single unvegetated streambed was found to occur in the southern portion of the site. This streambed is ephemeral in nature; therefore, it is not a Corps jurisdictional Waters of the U.S. However, the ephemeral unvegetated streambed in the southern portion of the Project site is a Waters of the State and subject to regulation by both the CDFW and RWQCB. There are no RPO wetlands on site; the streambed within the Project footprint does not meet the County criteria for wetlands. (Alden, 2024)

2.1.1.4 Wildlife Corridors and Habitat Linkages

A corridor is a specific route that is used for the movement of species. Local corridors allow wildlife access to resources such as food, water, and shelter within the framework of its daily routines. Regional corridors provide these functions over a larger scale and link two or more large habitat areas, allowing the dispersal of organisms and the consequent mixing of genes between populations. A linkage is an area of land that supports or contributes to the long-term movement of wildlife and genetic exchange by providing live-in habitat that connects to other habitat areas. Many linkages occur as stepping-stones that are comprised of a fragmented archipelago arrangement of habitat over a linear distance (Alden, 2023).

Important corridors and linkages have been identified on a local and regional scale throughout the Multiple Habitat Conservation Program (MHCP) and Multiple Species Conservation Program (MSCP) planning areas. Figure 2.1-2, *North County MSCP (Draft) Regional Map*, shows the Project's location within the Draft North County MSCP and the surrounding vicinity. Additionally, Figure 2.1-3, *Cumulative Study Area & Regional Context*, shows the Project site's location in comparison to cumulative development in the area and the location of the Draft North County MSCP preserve areas on a regional scale.

The planning objectives of most corridors and linkages in coastal San Diego County include establishing a connection between the northern and southern regional populations of the California gnatcatcher, in addition to facilitating movement and connectivity of habitat for large mammals and riparian bird species. The proposed North County preserve system incorporates existing preserves and

ensures connections between these preserves through soft-line conservation areas, referred to as the Pre-approved Mitigation Area (PAMA). It is not expected that all land within PAMA will be incorporated into the preserve system. As shown in Figure 2.1-3, the Project site is located within the PAMA and designated preserve areas are located south and west of the Project site. While the Project site is inside the PAMA, the site is not within a core or linkage. (Alden, 2024)

Large mammals such as coyote detected on the site may use the Project site and the adjacent Rancho La Costa Reserve and additional PAMA to the south and west for movement. However, movement in the local area is partially restricted by existing development in the area. Therefore, the Project site is unlikely to contribute substantially to regional wildlife movement and habitat connectivity.

2.1.2 Regulatory Setting

Federal

Federal Endangered Species Act

Administered by the USFWS, the federal Endangered Species Act (ESA) provides the legal framework for the listing and protection of species (and their habitats) that are identified as being endangered or threatened with extinction. Actions that jeopardize endangered or threatened species and the habitats upon which they rely are considered a 'take' under the ESA. Section 9(a) of the ESA defines take as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in any such conduct." 'Harm' and 'harass' are further defined in federal regulations and case law to include actions that adversely impair or disrupt a listed species' behavioral patterns.

The United States Fish and Wildlife Service (USFWS) identifies critical habitat for endangered and threatened species. Critical habitat is defined as areas of land that are considered necessary for endangered or threatened species to recover. The ultimate goal is to restore healthy populations of listed species within their native habitat so they can be removed from the list of threatened or endangered species. Once an area is designated as critical habitat pursuant to the federal ESA, all federal agencies must consult with the USFWS to ensure that any action they authorize, fund, or carry out is not likely to result in destruction or adverse modification of the critical habitat. There is no critical habitat designated on site.

Sections 7 and 10(a) of the federal ESA regulate actions that could jeopardize endangered or threatened species. Section 7 describes a process of federal interagency consultation for use when federal actions may adversely affect listed species. A biological assessment is required for any major construction activity if it may affect listed species. In this case, take can be authorized via a letter of biological opinion issued by the USFWS for non-marine related listed species issues. A Section 7 consultation (formal or informal) is required when there is a nexus between endangered species' use of the site and impacts to Corps jurisdictional areas. Section 10(a) allows issuance of permits for incidental take of endangered or threatened species with preparation of a Habitat Conservation Plan (HCP). The term "incidental" applies if the taking of a listed species is incidental to, and not the purpose of, an otherwise

lawful activity. An HCP demonstrating how the taking would be minimized and how steps taken would ensure the species' survival must be submitted for issuance of Section 10(a) permits.

Migratory Bird Treaty Act

All migratory bird species that are native to the United States or its territories are protected under the federal Migratory Bird Treaty Act (MBTA), as amended under the Migratory Bird Treaty Reform Act of 2004 (FR Doc. 05-5127). The MBTA is generally protective of migratory birds but does not actually stipulate the type of protection required. In common practice, the MBTA is now used to place restrictions on disturbance of active bird nests during the nesting season (generally February 1 to September 1). In addition, the USFWS commonly places restrictions on disturbances allowed near active raptor nests. As a standard condition, the Project must comply with the MBTA.

Rivers and Harbors Act and Clean Water Act

Federal wetland regulation (non-marine issues) is guided by the Rivers and Harbors Act of 1899 and the Clean Water Act (CWA). The Rivers and Harbors Act deals primarily with discharges into navigable waters, while the purpose of the CWA is to restore and maintain the chemical, physical, and biological integrity of all WUS. Permitting for projects filling WUS (including wetlands) is overseen by the Corps under Section 404 of the CWA. Projects could be permitted on an individual basis or be covered under one of several approved Nationwide Permits. Individual Permits are assessed individually based on the type of action, amount of fill, etc. and typically require substantial time (often longer than 6 months) to review and approve, while Nationwide Permits are pre-approved if a project meets appropriate conditions.

State of California

California Environmental Quality Act

Primary environmental legislation in California is found in CEQA and its implementing guidelines (State CEQA Guidelines), which require that projects with potential adverse effects (or impacts) on the environment undergo environmental review. Adverse environmental impacts are typically mitigated as a result of the environmental review process in accordance with existing laws and regulations.

California Endangered Species Act

The California Endangered Species Act (CESA) is similar to the federal ESA in that it contains a process for listing of species and regulating potential impacts to listed species. California ESA Section 2081 authorizes the CDFW to enter into a memorandum of agreement for the take of listed species for scientific, educational, or management purposes.

Native Plant Protection Act

The Native Plant Protection Act (NPPA) enacted a process by which plants are listed as rare or endangered. The NPPA regulates collection, transport, and commerce in listed plants. The California ESA follows the NPPA and covers both plants and animals designated as endangered or threatened with extinction. Plants listed as rare under NPPA were also designated rare under the California ESA.

California Fish and Game Code

California Fish and Game Code (Sections 1600 through 1603) requires a California Department of Fish and Wildlife (CDFW) agreement for projects affecting riparian and wetland habitats through issuance of a Streambed Alteration Agreement (SAA).

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act of 1970 grants the State Water Resource Control Board (SWRCB) and its regional offices (RWQCBs) power to protect water quality and is the primary vehicle for implementation of the State's responsibilities under Section 401 of the CWA. The Porter-Cologne Act grants the SWRCB authority and responsibility to adopt plans and policies, regulate discharges to surface and groundwater, regulate waste disposal sites, and require cleanup of discharges of hazardous materials and other pollutants. Typically, the SWRCB and RWQCB act in concert with the Corps under Section 401 of the Federal CWA in relation to permitting fill of federal jurisdictional waters.

California Natural Communities Conservation Planning Act

The California Natural Communities Conservation Planning (NCCP) Act of 1991 (Section 2835) allows the CDFW to authorize interim take of species covered by plans in agreement with NCCP guidelines. A Natural Communities Conservation Program initiated by the State of California focuses on conserving coastal sage scrub, and in concert with the USFWS and the federal ESA, is intended to avoid the need for future federal and state listing of coastal sage scrub-dependent species. The County of San Diego became a participant in the NCCP in 1993 for projects located within the planning area for the Coastal Sage Scrub NCCP with the intent to "…provide for regional protection and perpetuation of natural wildlife diversity while allowing compatible land use and appropriate development and growth." The NCCP process guidelines were established as interim guidelines until formal subregional plans were approved. The draft NCMSCP will be the subregional plan for this portion of the County when adopted. Until then, an NCCP 4(d) take permit (Habitat Loss Permit; HLP) is required for the project to demonstrate compliance with the NCCP Act.

County of San Diego

Habitat Loss Permit Ordinance

The Habitat Loss Permit (HLP) Ordinance was adopted in March of 1994 in response to both the listing of the CAGN as a federal threatened species and the adoption of the NCCP Act by the State. Pursuant

to the Special 4(d) Rule under the federal ESA, the County is authorized to issue "take permits" for the CAGN (in the form of HLPs) in lieu of Section 7 or 10(a) permits typically required from the USFWS. Although issued by the County, the USFWS and CDFW must concur with the issuance of an HLP for it to become valid as 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 would directly or indirectly impact any of several coastal sage scrub habitat types. The HLP Ordinance requires an HLP if coastal sage scrub or related habitat will be impacted, regardless of whether it is currently occupied by the California gnatcatcher (CAGN). An HLP is not required for projects within the boundaries of the MSCP that have an adopted subarea plan; this project lies within the boundaries of the draft NCMSCP, which is still in draft form. HLPs are also not required for projects that have separately obtained Section 7 or 10(a) permits for take of the CAGN; this project has not.

Approval of an HLP is based on findings made pursuant to the HLP Ordinance. Findings need to demonstrate that a project's loss of coastal sage scrub would not exceed the County's 5 percent interim allowable loss limit. It would also have to demonstrate that the habitat loss would not preclude connectivity between areas of high habitat values or preclude or prevent the preparation of a subregional NCCP plan. Additionally, the findings must show that the habitat loss has been minimized and mitigated to the maximum extent practicable in accordance with Section 4.3 of the Southern California Coastal Sage Scrub NCCP Process Guidelines, and that the habitat loss would not appreciably reduce the likelihood of survival and recovery of listed species in the wild. Finally, the habitat loss must be incidental to otherwise lawful activities. An HLP application must be filed with the County if the draft NCMSCP has not been adopted at the time of its environmental review because impacts to coastal sage scrub occupied by the CAGN would occur.

Resource Protection Ordinance

The County regulates natural resources (among other resources) as sensitive biological resources via the Resource Protection Ordinance (RPO) (County 2011), the regulations of which cover wetlands, wetland buffers, sensitive plant and animal species, sensitive vegetation communities/habitat types, and habitats containing sensitive animals or plants.

RPO wetlands are defined as lands having one or more of the following attributes:

- At least periodically, the land supports a predominance of hydrophytes (plants whose habitat is water or very wet places);
- The substratum is predominantly undrained, hydric soil; or
- An ephemeral or perennial stream is present, whose substratum is predominately non-soil, and such lands contribute substantially to the biological functions or values of wetlands in the drainage system.

According to the RPO, the following are not considered RPO wetlands:

- Lands which have attribute(s) specified above, solely due to man-made structures (e.g., culverts, ditches, road crossings, or agricultural ponds), provided that the Director of Planning and Land Use determines that they:
  - Have negligible biological function or value as wetlands;
  - Are small and geographically isolated from other wetland systems;
  - Are not vernal pools; and
  - Do not have substantial or locally important populations of wetland dependent sensitive species.

- Lands that have been degraded by past legal land disturbance activities to the point that they meet the following criteria as determined by the Director of Planning and Land Use:
  - Have negligible biological function or value as wetlands even if restored to the extent feasible; and,
  - Do not have substantial or locally important populations of wetland dependent sensitive species.

As noted previously, the Project would not affect County RPO wetlands.

Sensitive Habitat Lands are defined by the RPO as:

- Land which supports unique vegetation communities, or the habitats of rare or endangered species or sub-species of animals or plants as defined by Section 15380 of the State CEQA Guidelines (14 Cal. Admin. Code Section 15000 et seq.), including the area which is necessary to support a viable population of any of the above species in perpetuity, or which is critical to the proper functioning of a balanced natural ecosystem or which serves as a functioning wildlife corridor.
  - "Unique vegetation community" refers to associations of plant species which are rare or substantially depleted. These may contain rare or endangered species, but other species may be included because they are unusual or limited due to a number of factors, for example: (a) they are only found in the San Diego region; (b) they are a local representative of a species or association of species not generally found in San Diego County; or (c) they are outstanding examples of the community type as identified by the CDFW listing of community associations.

There are no unique vegetation communities on the Project site; however, Sensitive Habitat Lands on-site include coastal sage scrub, scrub oak chapparal, mafic chamise chaparral, mafic southern mixed chaparral, and non-native grassland because it supports Orcutt's brodiaea, which is a County List A Species.

The remaining portions of the Project site are not Sensitive Habitat Lands as they are not areas that are necessary to support a viable population of rare and endangered species in perpetuity, or which are critical to the proper functioning of a balanced natural ecosystem or a wildlife corridor.

2.1.3 Analysis of Project Effects and Determinations as to Significance

This section describes the potential impacts to sensitive biological resources resulting from Project implementation. The Project has been designed around an extensive open space system in close coordination with USFWS and CDFW. Development areas are positioned specifically to preserve wildlife movement corridors, species, and habitat, including vernal pools, San Diego fairy shrimp (*Branchinecta sandiegonensis*) and the Quino checkerspot butterfly (*Euphydryas editha quino*). As a result, potential impacts to sensitive biological resources have been greatly avoided and minimized. Nonetheless, potential impacts to sensitive biological resources are still expected to occur as a result of Project implementation.

Biological resources may be either directly or indirectly impacted, and these impacts may be either permanent or temporary in nature. These key terms are defined below.

- *Direct*: Direct impacts are caused by a project and occur at the same time and place as the project.
- *Indirect:* Indirect impacts occur later in time or are farther removed in distance but are still reasonably foreseeable and attributable to project-related activities.
- *Permanent (Long-term):* All impacts that result in irreversible effects or removal of biological resources are considered permanent. For the purposes of this analysis, long-term impacts are synonymous with permanent impacts.
- *Temporary:* Any impacts considered to have reversible effects on biological resources may be viewed as temporary. As a general rule, impacts are considered temporary only if timely efforts would ensure that the impact is corrected to conditions equal to or superior to the conditions that existed prior to impact and if a monitoring program is implemented to ensure that the efforts are successful within a reasonable time frame.

Guidelines to determine the significance of each potential impact to sensitive biological resources are listed below. These significance guidelines are consistent with the County of San Diego's *Guidelines for Determining Significance and Report Format and Content Requirements – Biological Resources* (County Biology Guidelines) (County 2010) and Appendix G of the CEQA Guidelines. For organizational and presentation purposes, the order of the guidelines presented below differs slightly from the order presented in the County Biology Guidelines and CEQA Guidelines.

In accordance with these guidelines, a significant impact to biological resources would result if the Project would:

- Have a substantial adverse effect on riparian habitat or other sensitive natural communities (including riparian habitats) identified in local or regional plans, policies, or regulations, or by CDFW or USFWS.

- Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, marsh, vernal pool, coastal) through direct removal, filling, hydrological interruption, or other means.
- 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.
- Interfere substantially with the movement of a 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 one or more local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and/or conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

The following discussion of potential effects to sensitive biological resources is divided into five subject areas based on the significance guidelines outlined above: (1) riparian habitat and other sensitive natural communities; (2) federally protected wetlands; (3) special-status species; (4) wildlife movement and nursery sites; and (5) local policies, ordinances, and adopted plans. The analysis described herein for each of these subject areas considers the information presented in the County Biology Guidelines for each significance guideline.

2.1.3.1 Riparian Habitat and Other Sensitive Natural Communities

Guidelines for the Determination of Significance

A significant impact to riparian habitat and other sensitive natural communities would occur if the Project would:

- Have a substantial adverse effect on riparian habitat or another sensitive natural community identified in local or regional plans, policies, or regulations, or by CDFW or USFWS.

Guidelines Source

This significance threshold is based on Appendix G of the CEQA Guidelines.

Analysis

On-site Removal of Sensitive Vegetation Communities

As shown in Table 2.1-2, *Impacts to Vegetation Communities/Habitat Types*, the Project would result in permanent impacts to 7.2 acres of coastal sage scrub and coastal sage scrub-disturbed, 0.2-acre of scrub oak chaparral, 1.6 acres of mafic chamise chaparral, 2.8 acres of mafic southern mixed chaparral, and 15.4 acres of non-native grassland (Alden, 2024). The direct loss of these habitat communities is

considered a significant direct impact and would require mitigation (**Significant Direct Impact BIO-1**).

Impacts to Jurisdictional Waters and Wetlands

The identified ephemeral streambed on the Project site is unvegetated and does not meet County or agency criteria for wetland/riparian habitat. As such, Project-related impacts to Corps, CDFW, RWQCB, or County RPO wetlands or riparian habitats would be less than significant.

The Project design does not propose any groundwater withdrawal or other activity that could lower the groundwater table; thus, no impact would occur.

Human Activity On-Site

Increases in human activity on the Project site could result in significant indirect impacts to adjacent preserved habitat through potential unauthorized access and disturbance. Landscaping associated with the Project also could result in the introduction of invasive, non-native plant species to the Project footprint and their spread outside the Project footprint into the proposed open space. Potential indirect impacts associated with human activities would thus be significant and would require mitigation (**Significant Indirect Impact BIO-2**).

2.1.3.2 Federally Protected Wetlands

Guidelines for the Determination of Significance

A significant impact to federally protected wetlands would occur if the Project would:

- Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

Guidelines Source

This significance threshold is based on Appendix G of the CEQA Guidelines.

Analysis

The Project site contains an unvegetated streambed in the southern portion of the site. The unvegetated streambed is ephemeral and not subject to Corps jurisdiction; therefore, there would be no impacts to waters of the United States. However, the unvegetated streambed is considered a non-wetland waters of the State. Impacts to the non-wetland waters of the State from the Project total 0.01 acre (546 linear feet) and permits from the CDFW and RWQCB would be required. The unvegetated ephemeral streambed does not meet the criteria for County RPO wetlands. As such, there are no affected County RPO wetlands. Impacts to wetlands jurisdictional to CDFW and RWQCB are anticipated as a result of

Project activities which would be significant and would require mitigation (**Significant Indirect Impact BIO-3**).

2.1.3.3 Special-Status Species

Guidelines for the Determination of Significance

A significant impact to special-status species would occur if the project 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.

Guidelines Source

This significance threshold is based on Appendix G of the CEQA Guidelines.

Analysis

Special-Status Plant Species

Project construction would result in direct and permanent impacts to an estimated 1,710 individual Orcutt's brodiaea plants (County List A) out of an estimated population of 1,740 individuals on site **(Significant Direct Impact BIO-4)**. The suitable habitat area mapped for the species on site is 3.8 acres (depicted on Figure 2.1-1), of which 3.4 acres would be impacted and 0.4 acre would be preserved. In addition, Project construction would result in direct and permanent impacts to 12 individual Nuttall's scrub oaks (County List A), which is the dominant species in scrub oak chaparral on site **(Significant Direct Impact BIO-4).** Project construction would preserve ashy spike-moss (County List D) and would avoid southwestern spiny rush (County List D) as both occur within the proposed on-site open space preserve area. (Alden, 2024)

Special-Status Animal Species

The western spadefoot toad (County Group 2) was observed opportunistically during a gnatcatcher survey visit in 2020. The species also was heard calling by a Project biologist on March 13, 2021, but no eggs, tadpoles, or adults were directly observed. The Project biologist observed eggs and tadpoles in two water holding basins on March 20, 2021; however, a total of eight basins (with a total area of 0.14 acre) were determined to be suitable for toad breeding because they are all deep enough, and evidence of current and/or previous ponding was observed (refer to Figure 2.1-1). The spadefoot toad likely uses the surrounding coastal sage scrub, chaparral, and grassland on site for non-breeding purposes. Project construction would result in the direct and permanent removal of three locations where western spadefoot toad were observed and eight water holding basins (totaling 0.14 acre in area) suitable for toad breeding (Figure 2.1-1). The Project would also result in the direct and permanent removal of 7.2 acres of Diegan coastal sage scrub and Diegan coastal sage scrub-disturbed habitat on

and off site, 4.6 acres of chaparral on site, and 15.4 acres of non-native grassland on site that could be used for non-breeding purposes. Construction could also cause direct injury/mortality to individual toads **(Significant Direct Impact BIO-4**. Project-related grading, clearing, construction or other activities would permanently remove sensitive native or naturalized habitat. (Alden, 2024)

The California gnatcatcher (CAGN) (federal threatened; County Group 1) was found on the site using the site for breeding, and based on the species' behavior patterns and habitat needs, it would also use the site for non-breeding purposes (e.g., feeding and sheltering). Based on the habitat needs and behavioral patterns of the southern California rufous-crowned sparrow (County Group 1), it likely breeds, feeds, and shelters on site, as well. The Cooper's hawk (County Group 1) was observed flying overhead and potentially foraging on site; it was not observed breeding on site (no raptor nests were observed). However, the eucalyptus trees on the site have potential to be used as nesting sites for the species. (Alden, 2024)

Project construction would result in the direct and permanent removal of 7.2 acres of Diegan coastal sage scrub and Diegan coastal sage scrub-disturbed habitat on- and off-site occupied by the CAGN. Project construction could also have temporary noise impacts on CAGN nesting **(Significant Direct Impact BIO-4)**.

Project construction would result in the direct and permanent removal of 27.2 acres of the scrub, chaparral, and grassland habitats on- and off-site used, or potentially used, by the southern California rufous-crowned sparrow. Project construction could also have temporary noise impacts on this species' nesting **(Significant Direct Impact BIO-4 and BIO-5)**.

Project construction would result in the removal of potential foraging habitat for the Cooper's hawk, and eucalyptus woodland that has potential to support Cooper's hawk breeding, feeding, and sheltering. Project construction could also have temporary noise impacts on Cooper's hawk nesting **(Significant Direct Impact BIO-4 and BIO-5)**.

Indirect Impacts

Indirect impacts consist of secondary effects of a project that can occur during construction or from a project once built. As such, potential indirect impacts to sensitive plant and wildlife species may occur from Project-related night lighting; the potential introduction of invasive, non-native plant species; and unauthorized human access into sensitive areas during the Project's construction and long-term operation **(Significant Indirect Impact BIO-2)**.

Fugitive Dust

Fugitive dust produced by construction could disperse onto native vegetation beyond the Project impact footprint. A continual cover of dust can reduce the overall vigor of individual plants by reducing their photosynthetic capabilities and increasing their susceptibility to pests or disease. This, in turn, can affect animals dependent on these plants. Fugitive dust also may make plants unsuitable as

structural habitat for insects and birds. Fugitive dust would be a short-term, temporary impact of Project construction.

Noise

Excessing noise could impact the nesting success of the CAGN, southern California rufous-crowned sparrow, and/or Cooper's hawk through grading, clearing, fire fuel modification, and/or other noise-generating activities such as construction. This potential impact could occur during the general avian breeding season of January 15 through August 15 and affect each of these three species (the specific CAGN breeding season is February 15 to August 15, the specific breeding season for the southern California rufous-crowned sparrow is mid-March to mid-June [San Diego Management and Monitoring Program 2010], and the Cooper's hawk specific breeding season is January 15 to July 15).

Night Lighting

Night lighting that shines on or spills into native habitats adjacent to the project impact footprint can prevent nocturnal wildlife from using the habitat. It can also cause loss of native wildlife by providing nocturnal predators with an unnatural advantage over their prey. Night lighting could cause these impacts over the short-term during construction and over the long-term during operation of the Project.

Invasive, Non-native Plant Species

Invasive, non-native plant species are threats to native biological resources in that they can, for example, displace native plants, increase the threat of wildfire by increasing fuel load, and supplant plants used as forage by herbivorous species. Vehicles are the primary conduits for the spread of many invasive species, and activities and soil disturbance associated with construction of the Project could spread invasive, non-native plant species to adjacent areas supporting native vegetation. However, the adjacent undeveloped areas are like the Project site in plant species composition, so Project construction would not result in the spread of invasive, non-native plant species to those adjacent areas because they are already present. New invasive, non-native plant species could be introduced to the Project site, however, in erosion control materials.

Landscaping associated with the Project could include species that are not native to the area. Therefore, project landscaping could result in the introduction of invasive, non-native plant species to the Project footprint and their spread outside the project footprint.

Public Access

Increases in human activity in the area could result in degradation of preserved habitat and associated indirect impacts on special status species through the removal of vegetation and creation of unauthorized trails. In addition, illegal dumping of lawn and garden clippings, trash, and other refuse could occur.

Domestic Animals

The Project is residential in nature, so domestic predators (e.g., dogs and cats) may be introduced to the proposed preserve adjacent to the Project footprint. Such introductions have potential to harm native wildlife species through behavioral pattern disturbance and predation.

2.1.3.4 Wildlife Movement and Nursery Sites

Guidelines for the Determination of Significance

A significant impact to wildlife movement and nursery sites would occur if the Project would:

- Interfere substantially with the movement of a 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.

Guidelines Source

This significance threshold is based on Appendix G of the CEQA Guidelines.

Analysis

The Project site is not within a core or linkage and does not serve as a nursery site (Alden, 2024). Large mammals may, however, use the Project site and the local area for local movements, but movement opportunities are limited to the immediate north and east by existing development. Rather, the primary local movement pattern for large mammals occurs farther to the east through the Elfin Forest and Harmony Grove core areas identified in the draft NCMSCP. Therefore, the Project site has been determined to not contribute substantially to wildlife movement and habitat connectivity and, therefore, the Project's implementation would not substantially affect wildlife movement. As a benefit, however, the Project proposes a design that clusters residential development in the north portion of the site in order to preserve a corridor for local wildlife movement in the southern portion of the Project site connected with adjacent open space preserves to the west and south. Therefore, impacts to wildlife movement would be less than significant.

2.1.3.5 Local Policies, Ordinances, and Adopted Plans

Guidelines for the Determination of Significance

A significant impact to local policies, ordinances, and adopted plans would occur if the Project would:

- Conflict with one or more local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and/or would conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Guidelines Source

This significance threshold is based on Appendix G of the CEQA Guidelines.

Analysis

Under the County of San Diego Significance Thresholds, impacts associated with consistency to local policies, ordinances, and adopted plans would occur if a project impacted any amount of wetland or sensitive lands as outlined in the RPO. As noted above under the discussion of Threshold a, the Project would not impact wetlands but would result in removal of sensitive vegetation communities in the Project's development footprint including: Diegan coastal sage scrub and Diegan coastal sage scrub-disturbed; scrub oak chaparral; mafic chamise chaparral; mafic southern mixed chaparral; and non-native grassland. Thus, impacts associated with Project consistency with the RPO would be potentially significant.

Also, implementation of the Project could potentially result in the taking of migratory birds or destruction of active migratory bird nests and/or eggs protected under the MBTA, as breeding birds may temporarily or permanently leave their territories to avoid construction activities, which could lead to reduced reproductive success and increased mortality. Although compliance with the federal MTBA is a mandatory regulatory requirement, potential impacts to migratory birds protected under the MTBA would be potentially significant during the Project's construction **(Significant Direct Impact BIO-5)**.

2.1.4 Cumulative Impact Analysis

The cumulative study area is depicted on Figure 2.1-3, *Cumulative Study Area & Regional Context*. The area of consideration for cumulative impacts on biological resources (i.e., the cumulative study area) includes an a rea of unincorporated County including and surrounding the Project site and bordered by the cities of Carlsbad to the west, San Marcos to the north and west, Escondido to the east, and Encinitas to the southwest. The cumulative study area encompasses part of the Escondido Creek watershed and numerous preserves and reserves. The cumulative study area was chosen because it includes areas with similar biological resources to the Project site. This area includes lands within a reasonable distance from the Project site that may have a biologically based connection to the site in terms of habitat connectivity and development in the region. (Alden, 2024)

The loss of coastal sage scrub habitat would represent a potential cumulative impact on the western spadefoot toad, CAGN, southern California rufous-crowned sparrow, and other special status species with moderate potential to occur in this habitat. The Project would directly impact 7.2 acres of Diegan coastal sage scrub and Diegan coastal sage scrub-disturbed and one pair of CAGN through the removal of this habitat during construction. Projects are required to implement avoidance measures so that direct, inadvertent take of CAGN individuals is prevented. In addition, projects are required to compensate for impacts to coastal sage scrub at a minimum 1:1 ratio to ensure that the loss of occupied and suitable habitat for the CAGN is mitigated. Regardless, the Project would contribute to the

significant cumulative impact on the CAGN and other special status species. (Alden, 2024) **(Significant Cumulatively Considerable Impact BIO-1, BIO-2, BIO-3, BIO-4, and BIO-5)**.

2.1.5 Significance of Impacts Prior to Mitigation

Significant Direct and Cumulatively Considerable Impact BIO-1: Project-related grading, clearing, construction or other activities would permanently remove sensitive native or naturalized habitat.

Significant Indirect and Cumulatively Considerable Impact BIO-2: Human activities that occur near sensitive habitat communities and plant and wildlife species and their habitats have the potential to indirectly impact sensitive vegetation communities, plants, and wildlife.

Significant Indirect and Cumulatively Considerable Impact BIO-3: Project-related grading, clearing, construction or other activities would result in direct impacts to a non-wetland waters of the State subject to CDFW and RWQCB jurisdiction.

Significant Direct and Cumulatively Considerable Impact BIO-4: Project-related grading, clearing, construction or other activities would result in direct and indirect impacts to special-status plant species and special-status animal species.

Significant Direct and Cumulatively Considerable Impact BIO-5: Project-related grading, clearing, construction or other activities would impact sensitive lands and could potentially result in the taking of migratory birds protected under the MBTA.

2.1.6 Mitigation

M-BIO-1 Prior to vegetation clearance and issuance of grading permits, the Project Applicant shall provide evidence that on- and off-site preservation of 44.2 acres of sensitive vegetation communities, off-site preservation of 0.2 acre of non-sensitive communities, and on- and off-site restoration of 5.9 acres (including creation of 21 water holding basins suitable for western spadefoot toad breeding) as shown in Table 7 and on Figure 6 of the "Biological Technical Report for the Questhaven Tentative Map Project PDS2020-TM-5643" by Alden Environmental has occurred.

M-BIO-2 Prior to vegetation clearance and issuance of grading permits, temporary construction limits fencing with sign messaging indicating that the fencing shall not be crossed, shall be installed along the edges of the approved limits of physical disturbance where construction activities adjoin open space preservation areas. The positioning of the fencing shall be verified by a County-approved professional biologist prior to the commencement of ground-disturbing construction activities. The fencing shall be maintained in place over the duration of construction activities unless or until it is replaced with permanent open space fencing or another physical barrier.

M-BIO-3 Prior to issuance of the first certificate of occupancy, open space fencing and signage shall be installed at the following locations: 1) at the interface of the Project site and

the adjacent open space preserve; 2) at the southeast corner of the Project site where the site abuts non-preserve area; and 3) at the trailhead entering the preserve from the southwest~~; and 4)~~. (Figure 6 of the "Biological Technical Report for the Questhaven Tentative Map Project PDS2020-TM-5643" by Alden Environmental). At the request of the County, signage, alone, shall be installed around the off-site preserve area adjacent to the ~~an~~ existing ~~trail~~ easement (refer to Figure 6 of the "Biological Technical Report for the Questhaven Tentative Map Project PDS2020-TM-5643" by Alden Environmental for specific locations) to provide for ingress and egress for road and utility purposes (refer to Appendix F of the "Biological Technical Report for the Questhaven Tentative Map Project PDS2020-TM-5643" by Alden Environmental). The remaining preserve area boundaries shall not be fenced as they are adjacent to Preserve Areas in the Draft NCMSCP (refer to Figure ~~2~~ 6 the "Biological Technical Report for the Questhaven Tentative Map Project PDS2020-TM-5643" by Alden Environmental and have steep slopes with impenetrable vegetation, making fence installation unnecessary and infeasible.

M-BIO-4 Prior to the issuance building permits, the County shall review the Project's landscape plans and verify that only non-invasive plant species will be planted on the site (i.e., species not listed on the California Invasive Plant Council Inventory rated as Moderate or High).

M-BIO-5 The Project's homeowners association (HOA) CC&Rs shall require that 1) landscaping is prohibited from including species listed Moderate or High on the California Invasive Plant Council Inventory; and 2) all domestic cats are required to remain indoors. The HOA shall be responsible for providing information to residents to protect the adjacent open space preserve as the need arises. A copy of the CC&Rs shall be provided to the County for verification prior to issuance of the first certificate of occupancy.

M-BIO-6 Prior to issuance of grading permits, the Project Applicant shall obtain the appropriate permits/approvals from the regulatory agencies, including the CDFW and RWQCB for impacts to the jurisdictional non-wetland water of the State.

M-BIO-7 Prior to vegetation clearance and issuance of grading permits, the Project Applicant shall translocate Orcutt's brodiaea corms from within the Project impact footprint to suitable habitat within the on-site preserve in accordance with a County-, CDFW-, and USFWS-approved translocation plan.

M-BIO-8 If clearing of vegetation or grading activities will occur during the breeding season for the California gnatcatcher (CAGN) (February 15 to August 31) or nesting raptors such as the Cooper's hawk (January 15 to July 15), pre-construction survey(s) shall be conducted by a qualified biologist to determine whether these species occur within the construction footprint and/or adjacent areas potentially impacted by construction noise (i.e., 60 dB(A) hourly average or ambient, if greater). If it is determined at the completion of pre-construction surveys that active nests belonging to these sensitive

species are absent from the construction limits and adjacent potential noise-impacted area, construction shall be allowed to proceed. If pre-construction surveys determine the presence of active nests belonging to these sensitive species occur within the construction limits or adjacent noise-impacted area, the biologist shall determine the physical area in which construction activities cannot occur to protect the nesting species, and one of two actions shall occur: (1) construction activities in the area delineated by the biologist shall be postponed until a qualified biologist determines the nest(s) is no longer active or until after the respective breeding season; or (2) construction activities shall be postponed until a temporary noise barrier or berm is constructed at the edge of the development footprint or other location determined appropriate and effective by the biologist and an acoustical engineer to ensure that noise levels in the occupied habitat are reduced to below 60 dB(A) hourly average or ambient, if greater. Decibel output shall be confirmed by a County-approved acoustical engineer and intermittent monitoring by a qualified biologist shall occur to ensure that the reduced noise levels are being maintained. Implementation of this measure shall also mitigate for potential noise impacts to nesting southern California rufous-crowned sparrows.

2.1.7 Conclusion

The following provides a summary of the significance of the impact identified above under subsection 2.1.3 after incorporation of the mitigation measure identified under subsection 2.1.6.

Less-than-Significant Impact BIO-1 with Mitigation: Implementation of MM-BIO-1 would ensure that the Project's impacts to sensitive vegetation communities are mitigated through on- and off-site preservation and restoration. Accordingly, implementation of the required mitigation would reduce the Project's impacts to less-than-significant levels.

Less-than-Significant Impact BIO-2 with Mitigation: Implementation of MM-BIO-2, MM BIO-3, MM BIO-4, and MM BIO-5 would ensure that potential indirect impacts associated with the Project are mitigated through implementation of fencing, review of landscape plans, and ongoing HOA enforcement actions to ensure no unauthorized human access into sensitive areas occurs, no invasive plant species are introduced to the Project area and that the community is operating responsibly and avoiding potential indirect impacts from invasive plants and domestic cat predation.

Less-than-Significant Impact BIO-3 with Mitigation: Implementation of MM-BIO-6 would ensure that impacts associated with the Project are mitigated by requiring the Project obtain the appropriate CDFW and RWQCB agency permits for impacts to the jurisdictional non-wetland water of the State.

Less-than-Significant Impact BIO-4 with Mitigation*:* Implementation of MM-BIO-1 would ensure that the Project's direct and potentially indirect impacts to sensitive habitat utilized by sensitive species are addressed through on- and off-site preservation and restoration. Implementation of MM-BIO-2, MM BIO-3, MM BIO-4, and MM BIO-5 would ensure that potential indirect impacts associated with the Project are mitigated through implementation of fencing, signage, review of landscape plans, and

ongoing HOA enforcement actions to ensure no unauthorized human access into sensitive areas occurs, no invasive plant species are introduced to the Project area and that the community is operating responsibly and avoiding potential indirect impacts from invasive plants and domestic cat predation. Implementation of MM-BIO-7 would ensure that impacts to Orcutt's brodiaea are addressed through translocation to open space areas on-site. Implementation of MM-BIO-8 would ensure that potential impacts to sensitive bird species protected by the MBTA do not experience direct take and are sheltered from excessive construction-related noise. Accordingly, implementation of the required mitigation would reduce the Project's potential impacts to less-than-significant levels.

Less-than-Significant Impact BIO-5 with Mitigation: Implementation of MM-BIO-1 would ensure that the Project's impacts to sensitive habitat are addressed through on- and off-site preservation and restoration. Implementation of MM-BIO-8 would ensure impacts to sensitive bird species are protected from direct take and construction-related noise. Accordingly, implementation of the required mitigation would reduce the Project's potential impacts to federally protected migratory birds to less-than-significant levels.

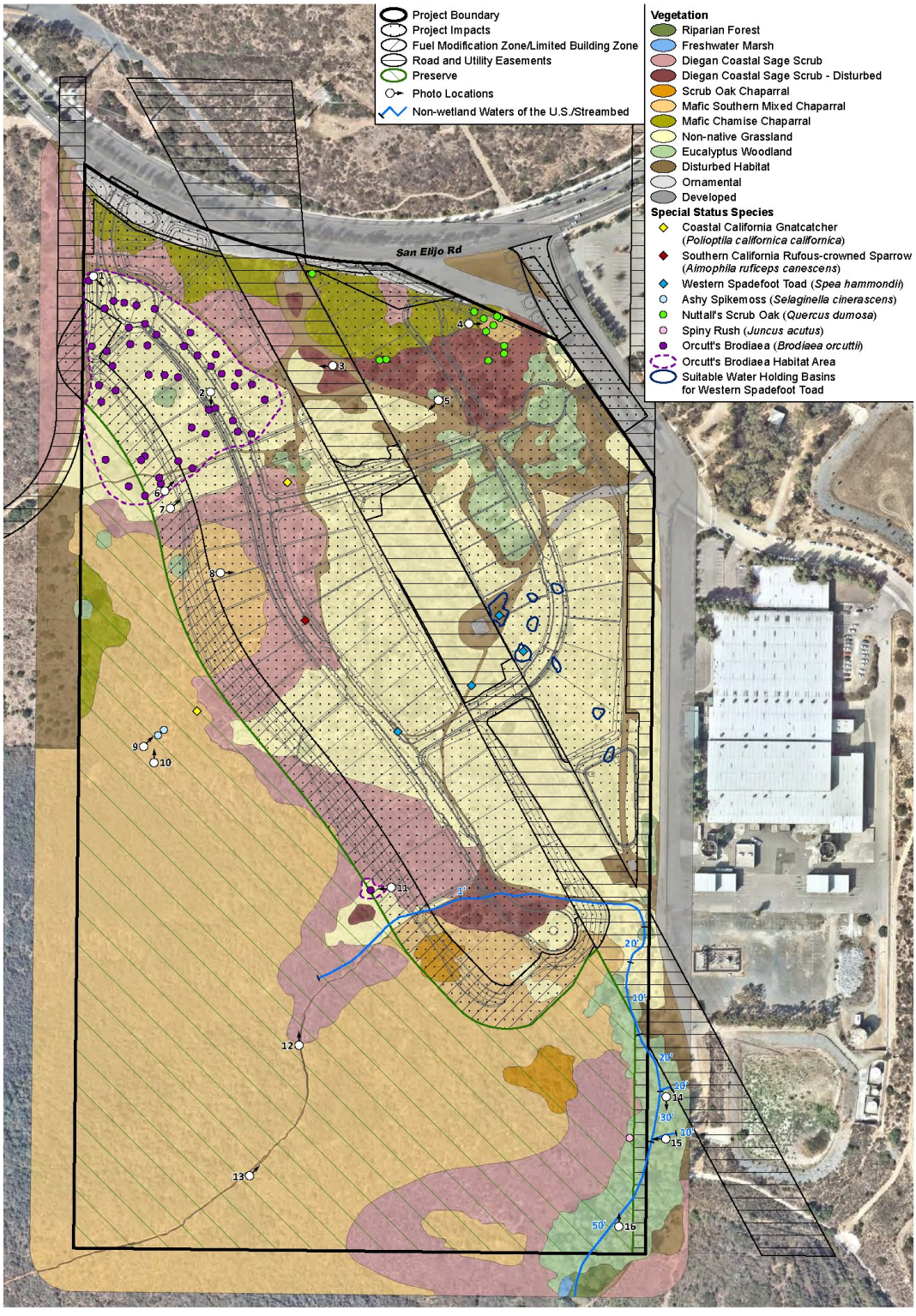
Table 2.1-1 Existing Vegetation Communities/Habitat Types

Vegetation Community/Habitat[1]	On Site (acres)	Off Site[2] (acres)
Diegan coastal sage scrub (32500)	9.8	0.2
Diegan coastal sage scrub-disturbed (32500)	2.1	-
Scrub oak chaparral (37900)	0.6	-
Mafic chamise chaparral (37220)	2.4	-
Mafic southern mixed chaparral (37122)	25.7	-
Non-native grassland (42200)	20.9	-
Eucalyptus woodland (79100)	2.9	-
Disturbed habitat (11300)	3.7	0.2
Developed and ornamental (12000)	1.0	~~0.8~~ 0.9
TOTAL ACRES	**69.1**	**~~1.2~~ 1.3**

[1]Categories and numeric codes are from Oberbauer et al. 2008.
[2]Off-site acreage values reflect off-site impacts of the Project outside of the Project site boundaries.

Table 2.1-2 Impacts to Vegetation Communities/Habitat Types

Vegetation Community/Habitat	On Site (acres)	Off Site (acres)	Total (acres)
Diegan coastal sage scrub (32500)	5.1	0.2	5.3
Diegan coastal sage scrub-disturbed (32500)	1.9	0.0	1.9
Scrub oak chaparral (37900)	0.2	0.0	0.2
Mafic chamise chaparral (37220)	1.6	0.0	1.6
Mafic southern mixed chaparral (37122)	2.8	0.0	2.8
Non-native grassland (42200)	15.4	0.0	15.4
Eucalyptus woodland (79100)	1.4	0.0	1.4
Disturbed habitat (11300)	2.4	0.2	2.6
Developed and ornamental (12000)	0.8	0.9	1.7
TOTAL ACRES	**31.6**	**1.3**	**32.9**

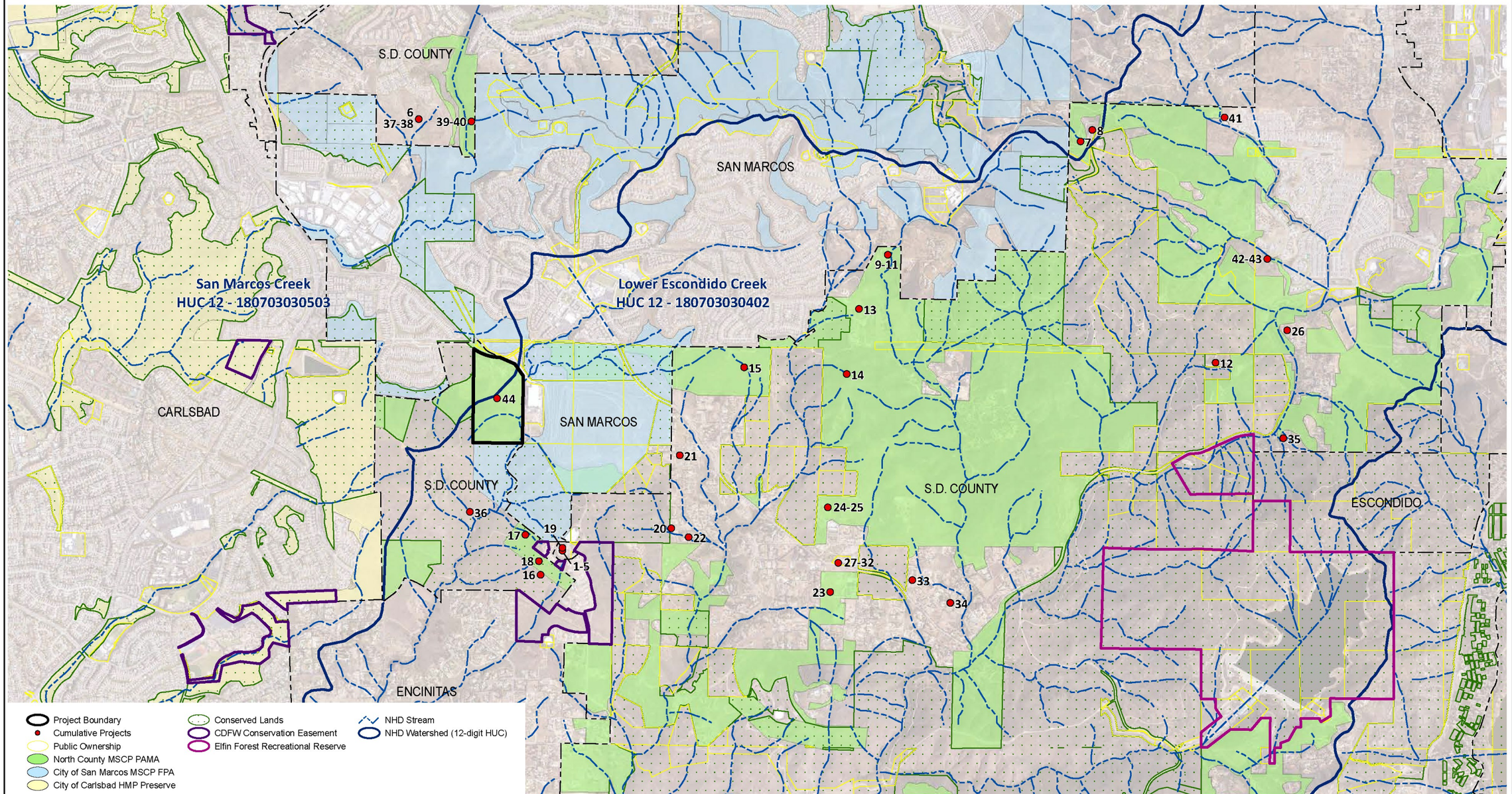


Source(s): Alden Environmental, Inc. (08-03-2021)

Figure 2.1-1

Not to Scale

Project Vegetation Communities and Sensitive Resources/Impacts

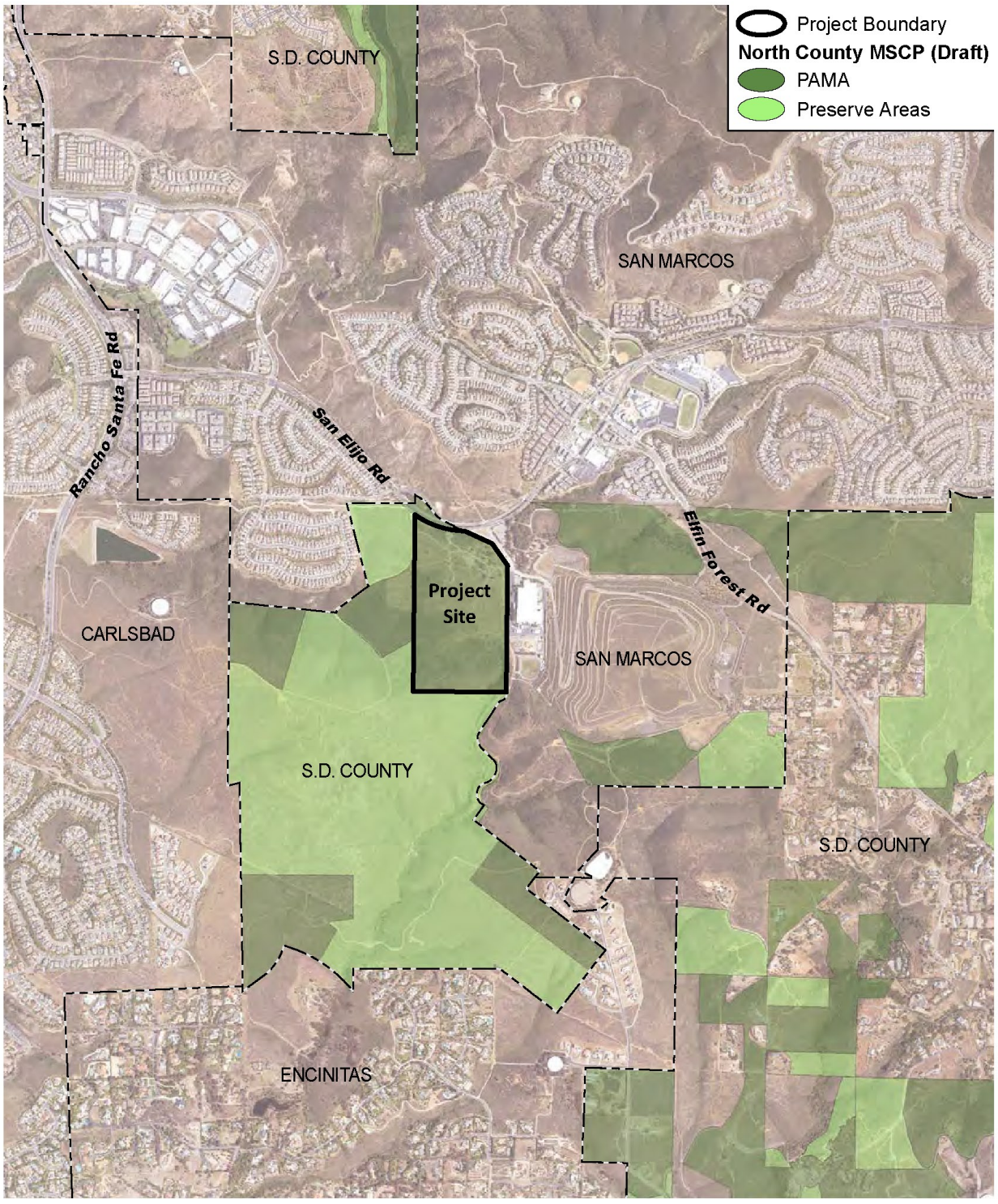


Source(s): Alden Environmental, Inc. (10-19-2023)

Figure 2.1-2

Not to Scale

Cumulative Study Area & Regional Context



Source(s): Alden Environmental, Inc. (10-19-2023)

Figure 2.1-3

Not to Scale

North County MSCP (Draft) Regional Map