



THE CITY OF SAN DIEGO
M E M O R A N D U M

DATE: October 11, 2017

TO: Planning Commission

FROM: Myra Herrmann, Senior Planner, Planning Department

SUBJECT: Errata to the Final PEIR/EIS for the City of San Diego Vernal Pool Habitat Conservation Plan (Project No. 441044/SCH No. 2011111075). Planning Commission Docket October 19, 2017

Subsequent to printing and distribution of the Final Program Environmental Impact Report (Final PEIR)/Environmental Impact Study (EIS) that you received last week, edits were made to the Vernal Pool Habitat Conservation Plan (VPHCP) which resulted in additional revisions to the Final PEIR/EIS. These minor edits were only required in Chapters 3 and 5 of the Final PEIR/EIS and affected corrections to the acreage of modeled habitat conserved (Table 3-5) and the acreages associated with the Expanded Conservation Alternative (Table 3-9), along with any associated text.

The revised pages noted below are attached and provided for your review:

- Pages 3-17 and 3-18 (Table 3-5 and Text)
- Pages 3-29 and 3-30 (Table 3-9 and Text)
- Page 3-31 (Table 3-10)
- Page 5.2-41 (Table 5.2-8)
- Page 5.2-42 (Text)
- Page 5.2-43 (Table 5.2-9)
- Page 5.2-46 (Text)
- Page 5.2-47 (Table 5.2-11)

These revisions do not affect the conclusions of the environmental analysis contained within the Final PEIR/EIS. Therefore, in accordance with Section 15088.5 of the California Environmental Quality Act (CEQA), recirculation of the Final PEIR/EIS is not required.

This Errata will be included in the record to City Council for consideration with adoption of the Vernal Pool Habitat Conservation Plan and Final PEIR/EIS certification process.

A handwritten signature in blue ink, reading "Myra Herrmann", is located below the text of the memorandum.

Myra Herrmann, Senior Planner

Attachments: Pages as noted above

cc: Project File

If a project is determined to be not in conformance, or if the Minor Amendment Process is not used, then the VPHCP benefits of the streamlined environmental and permitting process would not apply. Projects would be evaluated on a case-by-case basis consistent with the existing regulations for wetlands not covered by the VPHCP.

3.3.5 Overview of Conservation

Implementation of the VPHCP would expand the MHPA by 275 acres to include a total of 2,409 vernal pools located within a total of 53 vernal pool complexes, as well as 4,316 acres of modeled vernal pool habitat¹ (Table 3-5). Expansion of the MHPA would result in additional conservation of vernal pools, modeled habitat, covered species, and Critical Habitat for the covered species beyond existing conservation. The VPHCP adds lands to the existing MHPA that include vernal pools, as well as associated watershed, habitat buffers, and adjacent uplands to meet the tenets of appropriate and functional reserve design, as guided by USFWS (USFWS 2000). The protection of vernal pools, modeled vernal pool habitat, and Critical Habitat for the covered species as a function of the VPHCP reserve design through addition of lands to the MHPA is described below. The conservation analysis for the VPHCP is based on whether a vernal pool is located within the Preserve or not. Covered activities (e.g., management, trail use) are not evaluated in the VPHCP conservation analysis, as the location and extent of these future activities are unknown.

Table 3-5
Conservation of Vernal Pools after Implementation of the VPHCP

	Number of Complex Series In the VPHCP Plan Area	Number of Complex Series Conserved	Total Number of Pools in VPHCP Plan Area	Number of Pools inside Existing Conserved Areas	Number of Pools Conserved Based on Conservation Level ²	% of Total Pools in VPHCP Plan Area Conserved	Acreage of Pools Conserved	Acreage of Modeled Habitat Conserved
Existing Conservation ¹	54	45	2,591	2,199	2,183	84%	34.7	3,797 4,139
MHPA after VPHCP Implementation	54	53	2,591	2,472	2,409	93%	37.5	3,974 4,316
Additional Conservation Resulting from VPHCP Implementation	n/a	8	n/a	273	226	9%	2.8	177

n/a = not applicable

¹Existing conservation includes conserved lands within the City's existing MHPA, permitted projects, and planned projects.

See Chapter 4 of the VPHCP for more detail.

²Pools and species population conserved is an estimate based on 75% or 100% conservation level by vernal pool complex. See Appendix C of the VPHCP for more detail on the conservation analysis for each vernal pool complex in the VPHCP Plan Area.

¹ In recognition that there could be additional pools that have not been mapped, conservation of and potential impacts to modeled vernal pool habitat within the Plan Area from planned, covered, and future projects were assessed. The model included soils that support vernal pools in the plan area, slope (<12%), and undeveloped land within the plan area (see Appendix C of the VPHCP for further details on the model).

Conservation of Vernal Pools

Implementation of the VPHCP would provide additional conservation of vernal pools beyond current conservation within the City's existing MHPA, permitted projects, and planned projects (i.e., existing conservation), by adding lands to the MHPA that contain valuable vernal pool resources. Table 3-5 summarizes the additional conservation of vernal pools that would be provided under implementation of the VPHCP through addition of lands to the MHPA. The VPHCP would conserve an additional eight vernal pool complexes within the Plan Area, and conserve an additional 226 pools (approximately 9% more), totaling 2.8 acres of basin area, over what is currently conserved under the existing conservation.

In addition to conserving extant vernal pools, implementation of the VPHCP would result in the addition of lands to the MHPA that are suitable for vernal pool restoration (such as the mesa areas on Otay Mesa). Restoration of vernal pools and associated populations of covered species (per the goals and objectives of the VPHCP) would enhance the biological value of the MHPA, creating a more cohesive vernal pool Preserve and minimizing potential fragmentation of vernal pool habitat that could occur under the existing conservation scenario (i.e., piece-mealed or "postage stamp" conservation with no overall Preserve design for vernal pools). Once fully implemented, the VPHCP would add an additional 177 acres of modeled vernal pool habitat to the MHPA, representing a 32% increase in modeled conserved habitat from existing conservation (Table 3-5).

Conservation of Covered Species

Table 3-6 summarizes the additional conservation of vernal pools occupied by the covered species (beyond existing conditions) that would be provided under implementation of the VPHCP through addition of lands to the MHPA. As shown, the VPHCP would provide additional conservation (beyond existing conservation) for the following covered species:

- San Diego mesa mint – three additional occupied pools conserved (<1% increase)
- San Diego button-celery – three additional occupied pools conserved (1% increase)
- Riverside fairy shrimp – three additional occupied pools conserved (2% increase)
- San Diego fairy shrimp – 31 additional occupied pools conserved (6% increase)

As shown in Table 3-6, the addition of lands to the MHPA through implementation of the VPHCP would result in 100% conservation for one additional species from the existing conservation (Riverside fairy shrimp). In addition, conservation of occupied vernal pools would increase for San Diego mesa mint, San Diego button-celery, and San Diego fairy shrimp.

Conservation of Vernal Pools

Similar to the VPHCP, implementation of the Expanded Conservation Alternative would provide additional conservation of vernal pools beyond existing conservation within the City's existing MHPA, permitted projects, and planned projects (i.e., existing conservation), by adding lands to the MHPA that contain valuable vernal pool resources. The "Expanded Conservation Alternative Acreage" refers to the land area (acreage) associated with this alternative within any given parcel. This acreage is used to calculate the percent of conservation required for a given parcel, resulting in the additional lands that would be acreage added to the MHPA, in addition to the VPHCP under the Expanded Conservation Alternative as summarized in Table 3-9.

Table 3-9
Additional Lands added to the MHPA under the
Expanded Conservation Alternative¹

APN	Total Parcel Acreage ¹²	<u>Expanded Conservation Alternative Acreage</u>	Percent Conservation Required	Additional acreage to be Added to MHPA ¹²
6670101400	<u>20.4</u> <u>19.5</u>	<u>19.5</u>	75	<u>14.6</u> <u>15.3</u>
6670101500*	<u>41.1</u> <u>40.5</u>	<u>20.6</u>	75	<u>15.5</u> <u>30.8</u>
6670101900	<u>6.9</u> <u>7.7</u>	<u>7.7</u>	75	<u>5.8</u> <u>5.2</u>
6670102000	<u>6.9</u> <u>6.7</u>	<u>6.7</u>	75	<u>5.0</u> <u>5.2</u>
6670102100	<u>6.9</u> <u>7.2</u>	<u>7.2</u>	75	<u>5.4</u> <u>5.2</u>
6450761100	0.9	<u>0.9</u>	75	0.7
6450761200	0.9	<u>0.9</u>	75	0.7
6450761300	0.9	<u>0.9</u>	75	0.7
6450761400	0.9	<u>0.9</u>	75	0.7
6450761500	0.9	<u>0.9</u>	75	0.7
6450761600	0.9	<u>0.9</u>	75	0.7
6450730900	0.8	<u>0.8</u>	75	0.6
6450731100	0.8	<u>0.8</u>	75	0.6
6450731300	0.8	<u>0.8</u>	75	0.6
6450731400	0.8	<u>0.8</u>	75	0.6
6450741000	0.9	<u>0.9</u>	75	0.7
6450741100	0.9	<u>0.9</u>	75	0.7
6450741400	0.9	<u>0.9</u>	75	0.7
6450741500	0.9	<u>0.9</u>	75	0.7
6450741600	0.9	<u>0.9</u>	75	0.7
6450751000	0.9	<u>0.9</u>	75	0.7
6450751100	0.9	<u>0.9</u>	75	0.7
6450751200	0.9	<u>0.9</u>	75	0.7
6450751300	0.9	<u>0.9</u>	75	0.7
6450751600	0.9	<u>0.9</u>	75	0.7
6450751700	0.9	<u>0.9</u>	75	0.7

APN	Total Parcel Acreage ⁴²	Expanded Conservation Alternative Acreage	Percent Conservation Required	Additional acreage to be Added to MHPA ⁴²
6450761700	0.9	0.9	75	0.7
6450800300*	160.6157.3	8.6	75	120.56.5
6450730800	0.8	0.8	75	0.6
6670100600*	61.661.2	57.8	75	46.243.4
6450751500	0.9	0.9	75	0.7
6450761000	0.9	0.9	75	0.7
6450731000	0.8	0.8	75	0.6
6450741700	0.9	0.9	75	0.7
6450751400	0.9	0.9	75	0.7
6670103100*	46.045.4	0.23	75	34.50.2
6450731200	0.8	0.8	75	0.6
6450741300	0.9	0.9	75	0.7
6461100500*	9.29.1	5.9	75	6.94.4
6461100600*	4.774.7	0.6	75	3.60.5
6461100700*	5.05.1	5.1	75	3.8
6461100800	17.0		75	12.8
6461100800*	17.0	9.7	75	12.87.3
6461100900*	2.52.7	0.3	75	1.90.2
6461101000*	10.010.3	0.7	75	7.50.5
6461101100*	19.119.0	13.6	75	14.310.2
6670601000	49.4	34.6	75	37.126.0
6670601000	49.4	4.7	100	49.44.7
6670601000	49.4		100	49.4
3560320100	13.513.3	2.0	100	13.52.0
ROW (paper streets)**	3.7	3.7	75	2.7
Total	623.6507	236	--	495.7179

⁴¹Table does not include Caltrans sites that are being restored and will be transferred to the City.

⁴²Acreage has been rounded to nearest tenth based on GIS mapping data. Thus, totals may not appear to add correctly.

*Parcels located partially within existing MHPA.

**Note that the APN ROW is right-of-way area between the 1-acre parcels in Otay Mesa that are included in the Expanded Conservation Alternative.

Table 3-10 summarizes the additional conservation of vernal pools that would be provided under implementation of the Expanded Conservation Alternative through the addition of lands to the MHPA. The Expanded Conservation Alternative would conserve an additional nine vernal pool complexes within the Plan Area, and conserve an additional 277 pools (11% more), totaling 3.3 acres of basin area, over what is currently conserved under the existing conservation. In addition, the Expanded Conservation Alternative would conserve 4,142,484 acres of modeled vernal pool habitat (45% more than existing conservation).

Table 3-10
Conservation of Vernal Pools after Implementation of the
Expanded Conservation Alternative

	Number of Complex Series in the VPHCP Plan Area	Number of Complex Series Conserved	Total Number of Pools in VPHCP Plan Area	Number of Pools Inside Existing Conserved Areas	Number of Pools Conserved Based on Conservation Level ²	% of Total Pools in VPHCP Plan Area Conserved	Acreage of Pools Conserved	Acreage of Modeled Vernal Pool Habitat Conserved
Existing Conservation ¹	54	45	2,591	2,199	2,183	84%	34.7	3,797 4,139
MHPA after Implementation of Expanded Conservation Alternative	54	53	2,591	2,511	2,460	95%	38.0	4,142 4,484
Additional Conservation Resulting from Expanded Conservation Alternative	n/a	8	n/a	312	277	11%	3.3	345

¹Existing conservation includes conserved lands within the City's existing MHPA, permitted projects, and planned projects. See Chapter 4 of the VPHCP for more detail.

²Pools and species population conserved is an estimate based on 75% or 100% conservation level by vernal pool complex. See Appendix C of the VPHCP for more detail on the conservation analysis for each vernal pool complex in the VPHCP Plan Area.

Conservation of Covered Species

Table 3-11 summarizes the additional conservation of vernal pools occupied by the covered species that would be provided under implementation of the Expanded Conservation Alternative as compared to existing conservation through addition of lands to the MHPA. The Expanded Conservation Alternative would provide additional conservation (beyond existing conservation) for the following covered species:

- San Diego mesa mint – three additional occupied pools conserved (<1% increase)
- San Diego button-celery – eight additional occupied pools conserved (1% increase)
- Riverside fairy shrimp – three additional occupied pools conserved (2% increase)
- San Diego fairy shrimp – 33 additional occupied pools conserved (7% increase)

The Expanded Conservation Alternative would conserve the same number of additional occupied pools as the VPHCP for Riverside fairy shrimp, resulting in 100% conservation for this species within the Plan Area. The Expanded Conservation Alternative would conserve an even greater number of pools occupied by San Diego button-celery (additional 5 pools) and San Diego fairy shrimp (additional 2 pools) compared to the VPHCP.

Table 3-11
Conservation of Vernal Pools Occupied with Covered Species (Total and % Pools Conserved)
after Implementation of the Expanded Conservation Alternative

	PONU Total Pools in VPHCP Plan Area	PONU Total Pools Conserved	PONU % Pools Conserved	POAB Total Pools in VPHCP Plan Area	POAB Total Pools Conserved	POAB % Pools Conserved	NAFO Total Pools in VPHCP Plan Area	NAFO Total Pools Conserved	NAFO % Pools Conserved	ERAR Total Pools in VPHCP Plan Area	ERAR Total Pools Conserved	ERAR % Pools Conserved	ORCA Total Pools in VPHCP Plan Area	ORCA Total Pools Conserved	ORCA % Pools Conserved	RFS Total Pools in VPHCP Plan Area	RFS Total Pools Conserved	RFS % Pools Conserved	SDFS Total Pools in VPHCP Plan Area	SDFS Total Pools Conserved	SDFS % Pools Conserved
Existing Conservation ¹	369	369	100%	337	332	99%	95	94	99%	732	719	98%	58	58	100%	131	128	98%	517	431	83%
MHPA after Implementation of Expanded Conservation Alternative ²	369	369	100%	337	3355	99%	95	94	99%	732	727	99%	58	58	100%	131	131	100%	517	464	90%
Additional Conservation Resulting from Expanded Conservation Alternative	n/a	0	0	n/a	3	<1%	n/a	0	0	n/a	8	1%	n/a	0	0	n/a	3	2%	n/a	33	7%

n/a= not applicable

¹ Existing Conservation includes conserved lands within the City's existing MHPA, permitted projects, and planned projects.

² Pools and species population conserved are an estimate based on 75% and/or 100% conservation level by vernal pool complex. See Appendix C of the VPHCP for more detail on the conservation analysis for each vernal pool complex in the VPHCP Plan Area.

PONU = Otoy Mesa mint

POAB = San Diego mesa mint

NAFO = Spreading navarretia

ERAR = San Diego button-celery

ORCA = California Orcutt grass

RFS = Riverside fairy shrimp

SDFS = San Diego fairy shrimp

Table 5.2-8
Summary of Vernal Pools Impacts in VPHCP Plan Area (Project vs Existing)

	Total Number of Complexes in VPHCP Plan Area	Number of Complexes Not in MHPA	Total Number of Pools in VPHCP Plan Area	Total Pools Impacted by Development Based on Conservation Level ¹	Pools Impacted by Development outside MHPA (0% Conservation)	Pools Impacted by Development inside MHPA (Based on Conservation Level) ¹	Total Surface Area of Pools Impacted Based on Conservation Level ¹ (Acres)	Total Acreage of Modeled Vernal Pool Habitat Not Conserved
Project	54	1	2,591	182	120	62	7.6	3,974 <u>4,316</u>
Existing Conservation	54	9	2,591	408	392	16	10.4	3,797 <u>4,139</u>

¹Pools and species population conserved is based on 75% or 100% conservation level by vernal pool complex. The conservation level denotes the portion of a parcel that would be conserved. For example, for a parcel designated with a 75% conservation level, 25% of the parcel is available for development. Development would occur on the least environmentally sensitive area of the parcel, as determined by the City environmental review process. This table does not include impacts from covered activities.

impacts from maintenance and monitoring are expected to be avoided to the extent feasible through implementation of the avoidance measures identified in Chapter 5. Direct and indirect impacts to habitat from maintenance and monitoring are expected to be minimal. Temporary habitat disturbance during management, monitoring, restoration and enhancement activities will be minimal and these activities will ultimately improve ecological function of the site from conditions prior to ground disturbance. Therefore, no permanent impacts from restoration, long-term management, or monitoring are anticipated.

While the total loss of vernal pools is a relatively low percentage, with only 7% of vernal pools impacted within the VPHCP Plan Area (182 total pools; 120 outside the MHPA and 62 inside the MHPA) and only approximately one-third of those occupied with covered species (as discussed under Issue 1 above), the loss is substantial with respect to the remaining vernal pool habitat in the southern California region. It is estimated that over 90% of the pools that once occurred in southern California have already been lost, so any loss of vernal pool habitat must be evaluated in that context.

The City's ESL Regulations and LDM Biology Guidelines require no net loss of vernal pool habitat (i.e., all impacts will be offset with restoration and enhancement of an equal or greater acreage of habitat). Therefore, any direct impacts to vernal pools within the VPHCP Plan Area would be mitigated consistent with these regulations. A wetland deviation would only be required for impacts to vernal pools that occur inside the MHPA. If impacts occur outside the MHPA and the project is consistent with the VPHCP, a wetland deviation would not be required. Compensatory mitigation for all impacts, inside and outside the MHPA, would be required as part of the VPHCP Mitigation Framework implementation.

The VPHCP would add additional public and private lands to the City's existing MHPA to meet the goals and objectives for the covered species. Specifically, additional lands would be added in the following community planning areas: Otay Mesa, Kearny Mesa, Mira Mesa, and Navajo. Once these additional lands are added, the MHPA would conserve a total of 2,472 vernal pools within 53 vernal pool complexes (Table 5.2-9). Approximately 93% of the vernal pools within the VPHCP Plan Area would be conserved under implementation of the VPHCP. In addition, 3,974,316 acres of modeled vernal pool habitat would be conserved.

Implementation of the VPHCP would increase conservation from existing conservation conditions by adding 273 vernal pools (2.8 additional acres of basin area) within nine additional complexes, as well as 177 acres of modeled vernal pool habitat, to the MHPA. This is an approximately 9% increase in conservation of vernal pools and 32% increase in modeled vernal pool habitat from existing conservation.

**Table 5.2-9
Additional Conservation from Implementation of the VPHCP**

	Number of Complex Series in the VPHCP Plan Area	Number of Complex Series Conserved	Total Number of Pools in VPHCP Plan Area	Number of Pools inside Existing Conserved Areas	Number of Pools Conserved Based on Conservation Level ²	% of Total Pools in VPHCP Plan Area Conserved	Acreage of Pools Conserved	Acreage of Modeled Vernal Pool Habitat Conserved
Existing Conservation¹	54	45	2,591	2,199	2,183	84%	34.7	3,797 4,139
MHPA after VPHCP Implementation	54	53	2,591	2,472	2,409	93%	37.5	3,974 4,316
Additional Conservation Resulting from VPHCP Implementation	N/A	8	N/A	273	226	9%	2.8	177

N/A = not applicable

¹The existing conservation includes conserved lands within the City's existing MHPA, permitted projects, and planned projects.

²Pools and species population conserved is an estimate based on 75% or 100% conservation level by vernal pool complex. See Appendix C of the VPHCP for more detail on the conservation analysis for each vernal pool complex in the VPHCP Plan Area.

Indirect impacts to vernal pools may also occur as a result of development of upland watersheds surrounding vernal pool habitat. Modification of upland watersheds, such as altering topography by removing or filling soil, can disrupt natural hydrologic flow necessary for vernal pools to fill and pond. Altering watershed hydrology can impact covered species that occupy vernal pools (e.g., by reducing the ponding capacity of the basins). The VPHPC Mitigation Framework requires that impacts to upland watershed associated with vernal pools be avoided to maintain natural hydrological flows. Project-specific environmental review would include evaluation of impacts to watersheds and associated vernal pool resources and demonstrate consistency with the avoidance and minimization measures identified in the VPHPC Mitigation Framework.

In summary, direct impacts to mostly low-quality vernal pools as well as impacts to associated upland watershed would be mitigated through compliance with the City's ESL Regulations and compensatory mitigation that would be required by the VPHCP Mitigation Framework. Implementation of the VPHCP would conserve more vernal pools than are currently conserved under existing conditions, and would create a more cohesive and comprehensive Preserve area for vernal pools than currently exists. The preservation, maintenance, management, and (where needed) enhancement or restoration of vernal pools and associated watershed, as prescribed under the VPHCP, would provide an overall net benefit to the City's vernal pool resources.

A key component of the VPHCP is the restoration of degraded vernal pools throughout the Plan Area. Vernal pool restoration would involve relatively minor grading for recontouring or restoration of vernal basins to a more natural state, thus benefiting sensitive vernal pool habitat and associated covered species by improving hydrological and ecological function.

For these reasons, the Project would not result in a substantial adverse effect related to wetlands through direct removal, filling, hydrological interruption, or other means, and the impact would be less than significant.

Expanded Conservation Alternative

Table 5.2-10 shows the potential direct impacts to vernal pools under the Expanded Conservation Alternative. As shown, a total of 131 pools would potentially be directly impacted by development, and 2,135 acres of modeled vernal pool habitat would not be conserved. While 51 vernal pools would potentially be impacted by development inside the MHPA, 80 vernal pools would be impacted outside the MHPA under the Expanded Conservation Alternative as a result of the addition of lands to the Preserve (shown in Figures 2-2 through 2-4). As with the Project, only one vernal pool complex, KK1 Lake Murray, would not be included in the MHPA. This complex contains one isolated vernal pool and is not occupied by any covered species. The pool

Table 5.2-10
Summary of Vernal Pools Impacts (Expanded Conservation Alternative vs Existing Conservation)

Alternative	Total Number of Complexes Conserved	Number of Complexes Not in the MHPA	Total Number of Pools Conserved ¹	Total Pools Impacted by Development ¹	Pools Impacted by Development outside Preserve (0% Conservation)	Pools Impacted by Development inside Preserve ¹	Total Surface Area of Pools Impacted (Acres)	Total Acreage of Modeled Vernal Pool Habitat Not Conserved
Expanded Conservation Alternative	54	1	2,460	131	80	51	7.1	2,135
Existing Conservation	45	9	2,183	408	392	16	10.4	2,479

¹ Pool conservation and impacts are estimated based on 75% or 100% conservation level by vernal pool complex. This table does not include impacts from covered activities.

is surrounded by active park uses (i.e., ball fields and tennis courts), roads, and single-family homes. No impacts are proposed at this location. However, due to the low quality and isolated nature of the pool, along with the high potential for edge effects, no active management and monitoring activities are proposed for this site. This complex has only one vernal pool, which is not occupied by any covered species. The direct impact to vernal pools resulting from implementation of the Expanded Conservation Alternative represents an approximate 5% loss of the total number of vernal pools within the VPHCP Plan Area, totaling 7.1 acres of basin surface area. In addition, 2,135 acres of modeled vernal pool habitat would not be conserved.

Compared to existing conservation conditions, the Expanded Conservation Alternative would conserve 2,460 vernal pools, which is 277 more vernal pools (11%) than conserved under existing conservation (and 3.3 additional acres of basin area) as shown in Table 5.2-11. The Expanded Conservation Alternative would also conserve an addition 345 acres of modeled vernal pool habitat (54% increase), compared to existing conservation.

In summary, direct impacts under the Expanded Conservation Alternative would occur to mostly low-quality vernal pools and would be mitigated through compliance with the City's ESL Regulations, as well as through compensatory mitigation that would be required by the VPHCP Mitigation Framework. Implementation of the VPHCP under the Expanded Conservation Alternative would conserve more vernal pools and modeled vernal pool habitat than currently conserved under existing conditions. The Expanded Conservation Alternative would create a more cohesive and comprehensive Preserve area for vernal pools than existing conservation. The preservation, maintenance, management, and (where needed) enhancement or restoration of vernal pools, as prescribed under the VPHCP, would provide an overall net benefit to the City's vernal pool resources.

For these reasons, the Expanded Conservation Alternative would not result in a substantial adverse effect related to wetlands through direct removal, filling, hydrological interruption, or other means, and the impact would be less than significant.

Existing Conservation/No Project Alternative

Under the Existing Conservation/No Project Alternative, development projects would require an individual take permit from USFWS for potential impacts to vernal pools and covered species (either Section 7 or Section 10, depending on if a federal nexus exists). Impacts to vernal pools would be mitigated on a project-by-project basis. For these reasons, the Existing Conservation/No Project Alternative would not result in a substantial adverse effect related to wetlands through direct removal, filling, hydrological interruption, or other means, and the impact would be less than significant.

Table 5.2-11
Additional Conservation from Implementation of the Expanded Conservation Alternative

	Number of Complex Series in the VPHCP Plan Area	Number of Complex Series Conserved	Total Number of Pools in VPHCP Plan Area	Number of Pools inside Existing Conserved Areas	Number of Pools Conserved Based on Conservation Level ²	% of Total Pools in VPHCP Plan Area Conserved	Acreage of Pools Conserved	Acreage of Modeled Vernal Pool Habitat Conserved
Existing Conservation¹	54	45	2,591	2,199	2,183	84%	34.7	3,797 4,139
MHPA after Expanded Conservation Alternative	54	53	2,591	2,511	2,460	95%	38.0	4,142 4,484
Additional Conservation Resulting from Expanded Conservation Alternative	N/A	8	n/a	312	277	11%	3.3	345

N/A = not applicable

¹ The existing conservation includes conserved lands within the City's existing MHPA, permitted projects, and planned projects.

² Pools and species population conserved is an estimate based on 75% or 100% conservation level by vernal pool complex. See Appendix C of the VPHCP for more detail on the conservation analysis for each vernal pool complex in the VPHCP Plan Area. This table does not include impacts from covered activities.

However, the Existing Conservation/No Project Alternative scenario would likely result in isolated vernal pool mitigation sites, and would not allow for creation of a more cohesive and comprehensive Preserve area as proposed under the Project. In addition, the management and monitoring program included as part of implementation of the VPHCP would not exist, and there would be no city-wide management of vernal pools.

ISSUE 4: *Would the project interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites?*

Project

One of the primary objectives of the City's MSCP SAP is to identify and maintain a preserve system that allows for animals and plants to exist at both the local and regional levels. The MSCP SAP has identified large blocks of native habitat having the ability to support a diversity of plant and animal life known as "core biological resource areas." "Linkages" between these core areas provide for wildlife movement. These lands have been determined to provide the necessary habitat quality, quantity, and connectivity to sustain the unique biodiversity of the San Diego region.

Wildlife corridors have been identified within some locations containing vernal pool resources, such as Del Mar Mesa, Carmel Mountain, Mission Trails Regional Park, and Lopez Ridge. These locations are within the MHPA and are owned and managed by the City. The additional lands that would be added to the MHPA would further enhance opportunity for wildlife movement within these areas.

The VPHCP would be compatible with the MSCP SAP, and would provide for increased management and monitoring within the vernal pool complexes located in the MHPA, including where wildlife corridors occur. Management would also include weeding and restoration activities (if needed), which would provide for restored hydrological function and increased quality of habitat. Management and restoration of vernal pools would also increase ponding opportunities for resident and migratory wildlife species.

For these reasons, the Project would not result in a substantial adverse effect related to interference with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites. The impact would be less than significant.