

Natural Community Conservation Plan/Habitat Conservation Plan Frequently Asked Questions

What is an NCCP/HCP?

A Natural Community Conservation Plan/Habitat Conservation Plan is a document that estimates long-range potential environmental impacts of development activities. It also provides for comprehensive conservation and management of a specific set of sensitive species that are, or could be, impacted by those activities. Associated with the Plan are an Implementing Agreement and state and federal permits allowing for a specified amount of impacts to the identified species from activities undertaken in compliance with the Plan and Implementing Agreement.

Why is the Water Authority pursuing its own NCCP?

The Water Authority is an independent agency that plans, approves, constructs, operates and maintains a complex water infrastructure system. These activities, which are essential to the region's water reliability, could impact plant and animal species that are currently listed as endangered or threatened, or those that may become listed in the future. The process of obtaining separate permits for individual projects and activities that could have impacts on sensitive species is complex, time-consuming and costly. Having a comprehensive conservation program, and the permits that allow impacts to sensitive species, would provide the Water Authority the certainty that it can undertake activities covered by the Plan without being unduly constrained or delayed. Also, the Water Authority, as an independent agency, would not have to rely on permits issued to multiple local jurisdictions because it has already obtained permits for the geographic area in its own plan.

How would this Plan affect other NCCP/HCP permits issued to local entities for the same geographic area?

The Water Authority Plan overlays, but is separate from, other plans in the region. However, it has been designed to be complementary to other approved plans. The Plan's Preserve Area lands are all within or adjoin lands designated for conservation in plans established by other parties. Whenever possible, the Water Authority's Plan will avoid permanent impacts to habitat lands that are part of existing preserve areas. The Plan specifies that any covered activities must be compatible with the preserve designation

and fully compensate for unavoidable impacts. Mitigation commitments under this Plan have higher mitigation ratios if impacts are located in higher-value habitat lands. This creates an incentive to avoid those habitat lands and to redirect projects to lower-value lands, when possible. However, where the Water Authority's pre-existing rights-of-way along its major aqueduct alignments are located within preserve areas, these lands are not subject to the preserve's constraints.

Why does the Plan Area extend into Riverside County, which is outside of the Water Authority's service area?

The Water Authority's service area comprises most of western San Diego County. However, the Water Authority receives up to 90% of its imported water supply from key Metropolitan Water District of Southern California (MWD) facilities in Riverside County. Because the Water Authority pipelines connect directly to the MWD's water distribution system, the Water Authority could decide to construct future pipelines and associated facilities in Riverside County rather than have those projects constructed by MWD. A major pipeline project already approved by the Water Authority – Pipeline 6 – will have significant habitat impacts in Riverside County. The Plan would cover that project. Any future Water Authority project in Riverside County will be permitted through the Plan's Major Amendment process, and require new project-specific environmental documents.

Why does the Plan identify both a Survey Area and Probable Impact Zone?

The Water Authority expects that most of its future activities covered by the Plan will occur along its existing major water infrastructure alignments and rights-of-way. To assess the most likely impacts to sensitive habitats and species along this corridor, the Plan analyzed a 1000-foot area along both sides of the alignments or adjacent to facilities. This yields the 64,600 acres comprising the Probable Impact Zone, or PIZ. However, some projects may require facilities to be located outside the PIZ, so the Plan also identified a Survey Area that includes habitat and species located within one mile of the alignments and facilities. The Plan analyzed potential species impacts within this larger area for inclusion in the permits. Impacts from covered activities within the Survey Area/PIZ are proposed to be covered under the permits, but impacts from covered activities occurring outside those areas would require an amendment to the permits prior to approval.

Why does the Plan identify 64 species, which includes a number of species not currently listed as endangered or threatened by the state or federal governments?

Conservation plans are intended to provide a comprehensive approach to the preservation and management of multiple species and their habitats. This Plan initially assessed a much larger list of species that could warrant targeted conservation and management within the Plan Area. Based on all available information, the Water Authority then identified which of these:

- would most likely be affected by the covered activities, and
- are currently or more likely to become state or federal listed species, and
- whose conservation would likely benefit associated species, and
- could reasonably be expected to be addressed by the Plan.

The 64 proposed covered species that meet these criteria represent a balance between the Water Authority's need for certainty regarding endangered species' permit coverage for its activities and the conservation commitments it can reasonably make for sensitive species and habitats. The Plan excludes some endangered species because the Water Authority intends to avoid impacting those species as it implements its covered activities.

Why was Alternative 2 identified as the Proposed Project?

The four alternatives analyzed in the EIR/EIS provide a reasonable range of possible approaches to meeting the Water Authority goals of providing a safe and reliable water supply to the San Diego region. Alternative 1 maintains the status quo, where the Water Authority would continue to obtain permits for each individual project. This approach has proven to be time consuming, expensive, and results in small and fragmented mitigation efforts that benefit few species. Alternative 3 is the same as the Proposed Project except it includes a larger list of covered species. However, many of these species do not presently have sufficient information to ensure adequate long-term protection. Additional research would be required before impacts to any listed species could be permitted under the Plan. The Water Authority determined that coverage for these additional species was not warranted at this time. Alternative 4 would limit the Plan's permits to the PIZ area. However, the Water Authority's future projects may involve new construction outside of the existing major pipeline alignments and PIZ. Alternative 4 would require the Water Authority to obtain separate permits to cover those activities if they impacted endangered species, which would diminish the benefits from having prepared a NCCP/HCP.

Why will the Water Authority's Preserve Areas be managed by other public agencies?

The Water Authority had a previous agreement with the California Department of Fish and Game (DFG) to manage the Crestridge Preserve Area as part of the Emergency Storage Project mitigation. The Water Authority purchased the San Miguel Ranch Conservation Bank from the original owners, who had an existing agreement with the U. S. Fish and Wildlife Service to manage that property as part of the larger Otay-Sweetwater National Wildlife Refuge. When the Water Authority selected the Rancho Cañada property for inclusion in its NCCP/HCP, it was agreed that the DFG could most efficiently manage this 390-acre property as part of its adjacent 4,000-acre Monte Vista Ranch property. Similarly, previous agreements with the county of San Diego made it the logical choice to manage the Manchester and Tijuana preserve area properties

How will the details of the Preserve Area Management Plans be developed?

The managers for the DFG, USFWS and county of San Diego preserve areas described above will ensure the Preserve Area Management Plans (PAMPs) are prepared, consistent with guidance in Chapter 6 of the NCCP/HCP. The managers have been working with the Water Authority to develop the details to be included in these plans. These agencies are participating in the San Diego Management and Monitoring Program being developed by the San Diego Association of Governments to provide new and more effective approaches, methods and practices for preservation land management. The Water Authority's Plan includes a commitment to fund appropriate management and monitoring on its Preserve Area lands, including augmenting existing endowments, if necessary.