



Biological Impact Analysis for Wetlands

CIP No. R022; Pipeline, Recycled Pipeline – 30-Inch, 450 Zone, Otay Valley – Dairy Mart/450-1 Reservoir

The north end of this pipeline is located on the same site as reservoir R001. There are potential impacts to Otay tarplant at this site. Potential impacts to Otay tarplant can be minimized by selective placement of the pipeline on the site and locating staging areas off-site. As project details are finalized, biological surveys would be conducted to determine the exact impacts to Otay tarplant and subsequent mitigation.

Where the pipeline crosses the Otay River, a trenchless construction technology will be used to avoid impacts to the river.

This pipeline is located in roads or public rights-of-way. Along the pipeline, the following species have been identified in previous surveys: Orange-throated whiptail in 1988, coastal California gnatcatcher in 2000, and coastal Cactus wren. Construction will be limited to the existing development footprint in roads and other public rights-of-way.

CIP No. R081; Pipeline, RecPL – 16-Inch, 944 Zone, Lane Avenue – Proctor Valley/Pond No. 1

The northern section of this pipeline occurs in the Otay Water District San Miguel HMA, portions of which have been designated as critical habitat for Otay tarplant, quino checkerspot butterfly (QCB), and coastal California gnatcatcher. Species occurrences include Otay tarplant. The pipeline would be constructed in the existing dirt road along the Use Area. Potential impacts are anticipated. Impacts can be minimized by selective placement of pipeline on the site, and locating staging areas in areas that would not cause impacts. As project details are finalized, biological surveys would be conducted to determine the exact impacts and subsequent mitigation.

CIP No. R082; RecPL – 24-Inch, 680 Zone, Olympic Parkway – Village 2/Heritage Pipeline

The District will implement the portion of this project in Olympic Parkway. The other portion of this pipeline between Olympic Parkway and Heritage Road will be constructed by a developer, then operated and maintained by the District. The western portion of this pipeline that the District will implement travels through critical habitat for Otay tarplant and coastal California gnatcatcher. The pipeline will be constructed in Olympic Parkway and associated rights-of-way. The existing Olympic Parkway road lacks the primary constituent elements of critical habitat. No impact to habitat, critical or native, would occur.

CIP No. R085; RecPL - 20-inch, 680 Zone, Village 2-High School/Olympic

This pipeline will be constructed in Otay Ranch Village 2 development area, near a high school that has already been constructed. The pipeline will be installed in existing roadways and rights-of-way within the development footprint. There is no critical habitat near this pipeline.

DISTRICT IMPLEMENTED PHASE III PROJECTS

CIP No. R023; RecRes - 450-2 Reservoir 4.0 MG

This 4.0-million-gallon 450-2 Reservoir is to be located on a site near the western portion of Otay Mesa. The reservoir site will be approximately one acre on a site of coastal sage scrub vegetation. The site consists of coastal sage scrub and disturbed area. There is no critical habitat on or adjacent to this site. Potential impacts can be minimized by placing the reservoir away from habitat, and locating staging areas in areas that would not impact habitat.

CIP No. R034; Reservoir, RecRes-860-1 Reservoir 4.0 MG:

This reservoir is located within QCB designated critical habitat. The reservoir site will be approximately one acre in coastal sage scrub vegetation. Impacts to critical habitat are anticipated. Potential impacts to critical habitat can be minimized by placing the reservoir away from habitat, and locating staging areas in areas that would not impact habitat.

CIP No. R035; RecPS – 860-1 Pump Station (3,400 GPM)

The 860-1 Pump Station is to be located on the same site as the 450-2 Reservoir (R023) near the western portion of Otay Mesa. This pump station will be constructed within the footprint of the reservoir, an approximate one-acre site in coastal sage scrub vegetation. This site consists of coastal sage scrub, and some disturbed areas. There is no critical habitat on or adjacent to this site. Potential impacts can be minimized by placing the pump station away from habitat, and locating staging areas in areas that would not impact habitat.

CIP No. R052; RecPL – 30-Inch, 450 Zone, Tijuana Valley-Otay Mesa Place/450-2 Reservoir

This pipeline is approximately 4,200 feet long and will connect to the 450-2 reservoir. This site consists of coastal sage scrub vegetation and disturbed areas. Impacts to vegetation will occur. There is no critical habitat on or adjacent to this site.

CIP No. R053; Upgrade, RWCWRF - R.O. Building Remodel

This project is an upgrade to the RWCWRF. Designated critical habitat for coastal California gnatcatcher, QCB, LBV, and arroyo toad occur in the vicinity of the

RWCWRF. The project would occur within the existing developed area. The developed area where the project will be implemented lacks the primary constituent elements of critical habitat. There would be no impacts to any critical or native habitat.

CIP No. R055; Upgrade, RWCWRF - Effluent Meter

This project is an upgrade to the RWCWRF. Designated critical habitat for coastal California gnatcatcher, QCB, LBV, and arroyo toad occur in the vicinity of the RWCWRF. The project would occur within the existing developed area. The developed area where the project will be implemented lacks the primary constituent elements of critical habitat. There would be no impacts to any critical or native habitat.

CIP No. R058; RecPL – 16-Inch, 860 Zone, Airway Road – Otay Mesa/Alta

This pipeline will be constructed within the eastern portion of Airway Road, which is paved. Impacts can be minimized during construction by locating staging areas and equipment in areas that have already been disturbed. There is no critical habitat on or adjacent to this site.

CIP No. R067; Upgrade, RWCWRF - Waste Backwash Water Pipeline

This project is an upgrade to the RWCWRF. Designated critical habitat for coastal California gnatcatcher, QCB, LBV, and arroyo toad occur in the vicinity of the RWCWRF. The project would occur within the existing developed area. The developed area where the project will be implemented lacks the primary constituent elements of critical habitat. There would be no impacts to any critical or native habitat.

CIP No. R068 Upgrade; RWCWRF – Load Equalization Tank

This project is an upgrade to the RWCWRF. Designated critical habitat for coastal California gnatcatcher, QCB, LBV, and arroyo toad occur in the vicinity of the RWCWRF. The project would occur within the existing developed area. The developed area where the project will be implemented lacks the primary constituent elements of critical habitat. There would be no impacts to any critical or native habitat.

CIP No. R072; RecPL - 16-Inch, 860 Zone, Otay Mesa Road - 860-1 Pump Station/Heritage

A small portion of this pipeline travels through the edge of QCB critical habitat. This pipeline would be located in Otay Mesa Road, which is not a primary constituent element of critical habitat. No impact to critical habitat would occur.

CIP No. R073; RecPL - 24-Inch, 860 Zone, Alta Road - Airway/Border

This pipeline will be constructed in Alta Road, which is currently unpaved, between Otay Mesa Road and the United States and Mexico border. This pipeline is located within Riverside fairy shrimp proposed critical habitat. Impacts would occur when road improvements (i.e., paving) and pipeline construction occurs.

CIP No. R075; Pipeline, Brine Disposal Pipeline Otay Mesa to Metro Sewer System

The north end of this pipeline in Alta Road occurs near QCB critical habitat. The pipeline would be located in Alta Road, which lacks the primary constituent element of critical habitat.

The portion of this pipeline located in Dairy Mart Road is located in LBV critical habitat. Impact to this critical habitat may occur if the riparian habitat in the Tijuana River is disturbed at the Dairy Mart Road bridge. The bridge and road lack the primary constituent elements of critical habitat. Construction would occur outside the LBV breeding season (February 15th to August 30th). If construction must occur during the breeding season, a biological monitor would be present.

A portion of this pipeline is located in Riverside fairy shrimp proposed critical habitat. This portion of the pipeline is located within the existing Otay Mesa Road and Alta Road, which lack the primary constituent elements of critical habitat. There would be no impact to critical habitat.

CIP No. R077; Pipeline, RecPL – 24-Inch, 860 Zone, Alta Road – Alta Gate/Airway

The north end of this pipeline is adjacent to QCB critical habitat. This pipeline would be constructed in Alta Road and associated rights-of-way. This portion of Alta Road is paved and not a primary constituent element of critical habitat. No impacts to critical habitat or vegetation are anticipated.

Consultation with USFWS and Analysis of Potential Effects

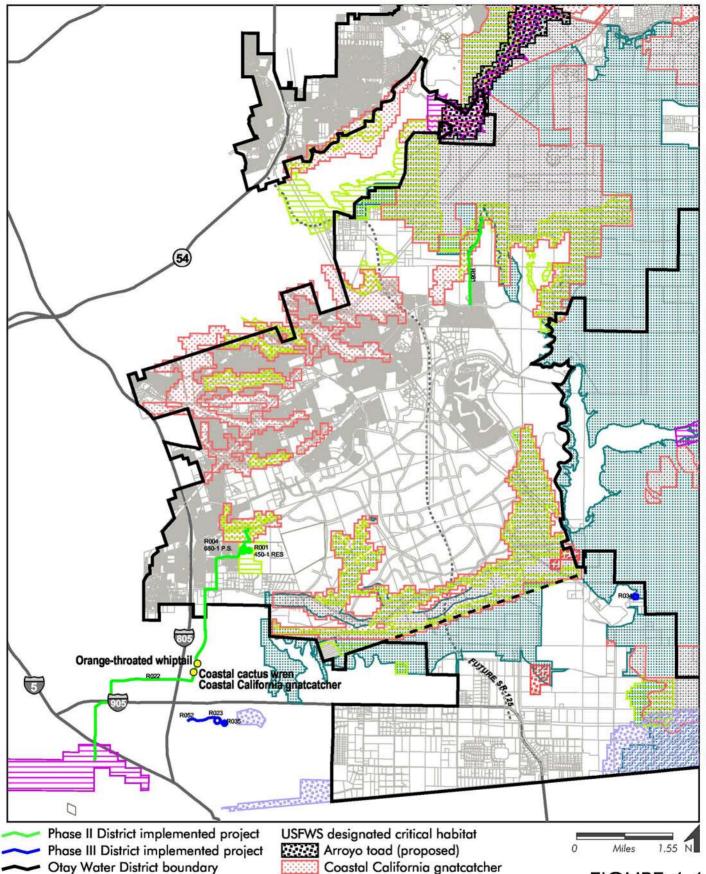
Analysis in this Programmatic EA revealed that eight projects have the potential to effect biological resources, including federally listed threatened and endangered species. These projects are listed in Table 4.1 and shown in Figure 4.4. Preliminary estimates indicate that a total of approximately 10 acres of undeveloped land will be impacted, including disturbed areas. Some of this land is native vegetation, primarily coastal sage scrub habitat, while other areas are nonnative grassland, former agricultural lands, or other disturbed habitats. The District proposes to offset impacts with conservation actions at the San Miguel HMA.

TABLE 4.1 DISTRICT IMPLEMENTED PROJECTS AND POTENTIAL ENVIRONMENTAL EFFECTS

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| CIP | | | Preliminary Estimate of | | |
|--------------|-----------------|---|--------------------------|---|---|
| Number | Type | Description | Permanent Impact Acres | Issue | Significance Level |
| R 001 | Reservoir | RecRes-450-1 Reservoir 12.0 MG | <u>5.14</u> acres | Critical habitat for Otay tarplant. Tarplant present at site. Nonnative grassland, <u>Diegan</u> coastal sage scrub, and maritime succulent scrub vegetation. | Less than significant with implementation of conservation measures recommended in BO ¹ . Follow Biological Measures in 1999 USFWS BO, project EIR, and PEIR for WRMP. |
| R004 | Pump Station | RecPS–680-1 Pump Station (11,500 GPM) | Within 4.5 acres of R001 | Critical habitat for Otay tarplant. Tarplant present on site. Non-native grassland vegetation. | Less than significant with implementation of conservation measures as recommended in BO ¹ . Follow Biological Measures in 1999 USFWS BO, project EIR, and PEIR for WRMP. |
| R022 | Pipeline | RecPL–30-Inch, 450 Zone, Otay Valley– Dairy Mart/450-1 Reservoir | - | Critical habitat for Otay tarplant, gnatcatcher, and vireo. Orange-throated whiptail occurrence nearby in 1988. Gnatcatcher occurrence in 2000. Part of alignment in Vireo critical habitat. Temporary impacts in developed areas, approximately 30 acres. Approximately 1 acre of temporary impacts to disturbed vegetation. | Less than significant with implementation of conservation measures as recommended in BO¹. Follow Biological Measures in 1999 USFWS BO, project EIR, and PEIR for WRMP. |
| R081 | Pipeline | RecPL–16-Inch, 944 Zone, Lane Avenue–Proctor Valley/Pond No. 1 | 2 acre | Critical habitat for Otay tarplant, gnatcatcher, and Quino. Approximately 2 acres of permanent impact in disturbed dirt road within HMA. | Pipeline located in dirt road in Use Area. Less-than-significant with implementation of conservation measures recommended in BO ¹ . |
| R034 | Reservoir | RecRes–860-1 Reservoir 4.0 MG | 1 acre | Quino Critical habitat. Coastal sage scrub vegetation. | Less than significant with implementation of conservation measures recommended in the BO ¹ . |
| R023 | Reservoir | RecRes-450-2 Reservoir 4.0 MG | 1 acre | Undeveloped coastal sage scrub vegetation. No critical habitat. | Less than significant with implementation of conservation measures recommended in the BO ¹ . |
| R035 | Pump Station | RecPS-860-1 Pump Station (3,400 GPM) | Within 1 acre of R023 | Undeveloped coastal sage scrub vegetation. No critical habitat. | Less than significant with implementation of conservation measures recommended in the BO ¹ . |
| R052 | Pipeline | RecPL-30-Inch, 450 zone, Otay Mesa Road – Remington Hills/450-2 Reservoir | 1 acre | Undeveloped coastal sage scrub vegetation. No critical habitat. Approximately 5 acres of temporary disturbance, and 1 acre of permanent impact in coastal sage scrub and disturbed vegetation. | Less than significant with implementation of conservation measures recommended in the BO ¹ . |

¹A Section 7 Consultation has been initiated to address Endangered Species Act issues. Conservation measures will be recommended in the Biological Opinion that USFWS will issue when the current Section 7 Consultation commences.



Sensitive species location within 150 feet of CIPs (Source: CNDDB, 2004)

RECON M:\jobs\3252\env\env.apr\ fig4.4 (projects) 08/13/04 Coastal California gnatcatcher

Least Bell's vireo (proposed) Otay tarplant

Quino checkerspot butterfly Riverside fairy shrimp (proposed)

Note: CIP projects are shown with project numbers.

San Diego fairy shrimp

FIGURE 4.4

District Implemented Projects and Potential **Environmental Effects** Projects R001, R004, and R022 will impact disturbed coastal sage scrub habitat that supports Otay tarplant. Surveys for the Otay tarplant resulted in a population estimate of 275,146 individuals (AMEC 2005). After moving the proposed location of the R001 reservoir to reduce impacts to Otay tarplant, approximately 673 individuals are expected to be impacted. The R001 site is designated critical habitat for the Otay tarplant. The area adjacent to the R001 site is designated Otay tarplant and coastal California gnatcatcher critical habitat. A portion of the area adjacent to the R001 site is part of the City of Chula Vista Subarea MSCP preserve. The R001 reservoir site will impact approximately two acres. The R004 pump station will be located within the impacted site of the reservoir. The R034 site will impact approximately one acre of coastal sage scrub habitat. This area is designated as QCB critical habitat. The closest known QCB occurrence is located approximately 1.8 miles southeast of the site.

The R023 reservoir site will impact approximately one acre of coastal sage scrub habitat. The R035 pump station will be located within the footprint of the one acre impacted area. The R052 pipeline connecting the R023 reservoir to the Project R022 pipeline will impact approximately one acre of permanent impact in coastal sage scrub habitat. Approximately 5 acres will be temporarily impacted during construction, and then revegetated. The District's right-of-way and access road will have approximately one acre of permanent impact. These are preliminary estimates.

The R081 pipeline will be located within the District's San Miguel HMA Use area. Preliminary estimates indicate that approximately one acre will be impacted. This pipeline will be constructed within an existing dirt road (an already disturbed area). Most of the disturbance and impacted area will occur within the dirt road. When construction is complete, the temporarily impacted areas will be revegetated.

District-implemented projects may impact areas designated as critical habitat for the coastal California gnatcatcher, LBV, and QCB. Gnatcatchers are known to occur in several coastal sage scrub habitat areas within the action area. Vireos have been observed in riparian habitat along the Tijuana River. QCB are known to occur approximately 0.5 mile northwest of the R081 site.

Formal Section 7 Consultation shall be initiated to address the endangered species issues. During Section 7 Consultation, the action and/or the conservation measures proposed by the District may be modified. The USFWS will determine whether the proposed action would jeopardize the survival and recovery of listed species or result in the destruction or adverse modification of designated critical habitat. The USFWS findings will then be documented in a Biological Opinion.

For the R001, R004 and R022 projects, detailed biological surveys have been conducted, and an EIR was prepared (AMEC 2005). For future District-implemented projects, the District will conduct project-level biological surveys consistent with the requirements of

USFWS as documented in the biological opinion. The District will implement the conservation measures in the biological opinion that will be issued at the end of the Section 7 consultation.

The remaining District-implemented projects are proposed within existing developed areas, including paved streets, and are not expected to result in impacts to biological resources. Pipeline R022 is within critical habitat designated for the least Bell's vireo. However, the primary constituent elements of vireo critical habitat are absent within the paved street surface. Measures to minimize indirect effect to vireo, such as construction outside of the nesting season or sound barriers, may be required by USFWS.

Impacts from developer-implemented projects, as part of the Otay Ranch development, is discussed in Section 4.3.1.2.

4.2.1.2 Developer Implemented Projects

Impacts to biological resources resulting from developer projects, primarily implementation of the Otay Ranch Villages, would be mitigated by compliance with the Otay Ranch planning documents including the GDP, SPA plans, GPD Program EIR, and both Phases of the RMP and appendices. Conveyance of required mitigation acres to the preserve is contingent upon building permit issuance. Mitigation for impacts that result from developer-implemented projects is addressed at the large-scale village development level.

DEVELOPER IMPLEMENTED PHASE II PROJECTS

CIP No. R013; Pipeline, RecPL - 16-Inch, 944 Zone, East H Street - Eastlake/Lane

This pipeline will be constructed within East H Street and associated road rights-of-way as part of the Otay Ranch development. There is no critical habitat on or adjacent to this site. Impacts to vegetation will occur during development of the area and the road.

CIP No. R016; Pipeline, RecPL – 16-Inch, 944 Zone, Eastlake Parkway – Trinidad Cove/Olympic

This pipeline will be constructed within Eastlake Parkway and associated road rights-of-way as part of the Otay Ranch development. There is no critical habitat on or adjacent to this site. Impacts to vegetation will occur during development of the area and the road.

CIP No. R025; RecPL – 12-Inch, 680 Zone, La Media Road – Olympic/Birch

This pipeline will be constructed in La Media Road and associated right-of-way as part of the Otay Ranch development. There is no critical habitat on or adjacent to this site. Impacts to vegetation will occur during development of the area and the road.

CIP No. R028; Pipeline, RecPL – 8-Inch, 680 Zone, Heritage Road – Olympic/Otay Valley:

The south end of this pipeline is located within designated critical habitat for coastal California gnatcatcher and QCB. This pipeline would be constructed within the alignment of Heritage Road. Impacts to vegetation and critical habitat will occur during construction and development of the road.

CIP No. R029; Pipeline, RecPL – 12-Inch, 944 Zone, Otay Lakes Road – Hunte/Eastlake Vistas

This pipeline will be constructed within Otay Lakes Road and associated road rights-of-way as part of the Otay Ranch development. There is no critical habitat on or adjacent to this site. Impacts to vegetation will occur during development of the area and the road.

CIP No. R030; Pipeline, RecPL – 8-Inch, 944 Zone, Eastlake Vistas – Otay Lakes/Olympic

This pipeline will be constructed within Eastlake Vistas and associated road rights-ofway as part of the Otay Ranch development. There is no critical habitat on or adjacent to this site. Impacts to vegetation will occur during development of the area and the road.

CIP No. R031; RecPL - 12-Inch, 944 Zone, EastLake Parkway - Olympic/Birch

This pipeline will be constructed within EastLake Parkway and associated road rights-ofway as part of the Otay Ranch development. There is no critical habitat on or adjacent to this site. Impacts to vegetation will occur during development of the area and the road.

CIP No. R032; RecPL - 12-Inch, 944 Zone, La Media Road - Olympic/Birch

This pipeline will be constructed within La Media Road as part of the Otay Ranch development. There is no critical habitat on or adjacent to this site. Impacts to vegetation will occur during development of the area and the road.

CIP No. R033; RecPL – 12-Inch, 944 Zone, Birch Road – La Media/EastLake

This pipeline will be constructed within Birch Road and associated road rights-of-way. As this part of the Otay Ranch development occurs, there will be impacts to vegetation from the construction of the road. There is no critical habitat on or adjacent to this site.

CIP No. R037; Pipeline, RecPL – 8-Inch, 680 Zone, La Media Road – Rock Mountain/Otay Valley

The south end of this pipeline occurs in critical habitat for Otay tarplant, coastal California gnatcatcher, and QCB. The pipeline would be constructed in La Media Road

and adjacent right-of-way during Otay Ranch development. Impacts to critical habitat and vegetation are anticipated to occur during this part of the Otay Ranch development and road construction.

CIP No. R038; Pipeline, RecPL – 8-Inch, 680 Zone, Rock Mountain Road – La Media/Otay Valley

The southern portion of this pipeline is located within designated critical habitat for coastal California gnatcatcher and QCB. A small part of this pipeline passes through Otay tarplant critical habitat. This pipeline will be installed as Rock Mountain Road is constructed. Impacts to critical habitat and vegetation will occur during this part of the Otay Ranch development and construction of Rock Mountain Road. Species occurrences within 150-feet of the preliminary road alignment include the San Diego marsh-elder in 1990.

CIP No. R040; Pipeline, RecPL – 12-Inch, 680 Zone, Hunte Parkway – Olympic/EastLake

The eastern edge of this pipeline passes through critical habitat for Otay tarplant, coastal California gnatcatcher, and QCB. This pipeline would be located in Hunte Parkway. No actual habitat, critical or native, would be impacted or disturbed. Species occurrences include Robinson's pepper-grass in 1997, and Parry's tetracoccus.

CIP No. R041; RecPL - 8-Inch, 944 Zone, EastLake Parkway - Birch/Rock Mountain

This pipeline will be constructed within EastLake Parkway and associated road rights-of-way. As this part of the Otay Ranch development occurs, there will be impacts to vegetation from the construction of the road. There is no critical habitat on or adjacent to this site.

CIP No. R042; RecPL – 8-Inch, 944 Zone, Rock Mountain Road – SR-125/EastLake

This pipeline will be constructed as Rock Mountain Road is constructed as part of the Otay Ranch development. There will be impacts to vegetation from this development and construction. There is no critical habitat on or adjacent to this site.

CIP No. R043; RecPL - 8-Inch, 944 Zone, Rock Mountain Road - La Media/SR-125

This pipeline will be constructed within Rock Mountain Road and associated road rights-of-way. As this part of the Otay Ranch development occurs, there will be impacts to vegetation from the construction of the road. There is no critical habitat on or adjacent to this site.

CIP No. R047; RecPL – 12-Inch, 680 Zone, La Media Road – Birch/Rock Mountain

This pipeline alignment is in La Media Road. The pipeline alignment does not intersect critical habitat. Impacts to vegetation will occur during road construction as this part of the Otay Ranch development occurs.

CIP No. R071; Pipeline, RecPL – 12-Inch, 944 Zone, Olympic Parkway – La Media/Eastlake

This pipeline will be constructed within Olympic Parkway and associated road rights-of-way as part of the Otay Ranch development. There is no critical habitat on or adjacent to this site. Impacts to vegetation will occur during development of the area and the road.

CIP No. R078; Pipeline, RecPL – 8-Inch, 680 Zone, Otay Valley Road – SR 125/Heritage

The majority of this pipeline is located within designated critical habitat for coastal California gnatcatcher and QCB. The east end of this pipeline is located in Otay tarplant critical habitat. This pipeline would be located within the existing roadbed of Otay Valley Road, which travels by the Otay River. A portion of Otay Valley Road and pipeline crosses riparian habitat in the Otay River. Species previously observed within 150-feet of the preliminary road alignment include San Diego marsh-elder in 1990. Impacts to critical habitat, vegetation, and wetlands would occur during construction of the road as this portion of the Otay Ranch development occurs.

CIP No. R079; Pipeline, RecPL – 6-Inch, 450 Zone, Otay Valley Road – Otay Valley/ Entertainment

This pipeline is located in coastal California gnatcatcher and QCB critical habitat. A portion of this pipeline would occur within the existing development footprint. Impacts to vegetation and critical habitat would occur as this project is constructed.

CIP No. R080; Pipeline, RecPL – 12-Inch, 680 Zone, Olympic Parkway – Medical Center/Heritage

This pipeline will be constructed within Olympic Parkway and associated road rights-of-way as part of the Otay Ranch development. There is no critical habitat on or adjacent to this site. Impacts to vegetation will occur during development of the area and the road.

CIP No. R082; RecPL - 24-Inch, 680 Zone, Olympic Parkway - Village 2/Heritage Pipeline

The District will construct the portion of this project in Olympic Parkway. The portion of this project between Olympic Parkway and Heritage road will be constructed by a developer, then operated and maintained by the District. The developer-implemented portion of this project would be located in a local roadway and associated right-of-way.

The developer-implemented portion of this pipeline alignment does not intersect critical habitat. Impacts to vegetation will occur during road construction as this part of the Otay Ranch development occurs.

CIP No. R083; RecPL - 20-inch, 680 Zone, Heritage Road - Village 2/Olympic

This pipeline will be constructed within Heritage Road and associated road rights-of-way as part of the Otay Ranch development. There is no critical habitat on or adjacent to this site. Impacts to vegetation will occur during development of the area and the road.

CIP No. R084; RecPL - 20-inch, 680 Zone, Village 2 - Heritage/La Media

This pipeline alignment will be located in a local roadway between Heritage Road and La Media Road. There is no critical habitat on or adjacent to this site. Impacts to vegetation will occur during development of the area and the road.

Biology Resource Mitigation Measures

Impacts to biological resources resulting from developer projects would be mitigated by compliance with the Otay Ranch planning documents including the GDP, SPA plans, GPD Program EIR, and both Phases of the RMP and appendices. Mitigation for impacts that result from developer-implemented projects is addressed at the large-scale village development level. General mitigation measures from the Otay Ranch Program EIR are listed below:

- Preservation of habitat and natural resources in open space, incorporation of open space into RMP, restoration and enhancement of disturbed habitat, and selected project redesign.
- Preservation of wildlife corridors within open space through project redesign where necessary, enhancement, restoration and habitat re-establishment, use of bridges for road crossings over corridors, and implementation of the RMP.

4.2.2 No Action Alternative

This alternative would not involve execution of an Agreement and subsequent federal funding of the District's Project. The District is likely to still implement the Project under this alternative, so environmental effects would be the same as effects for the proposed project.