

# Opens Space and Maintenance Assessment District's Impacts to Citywide Ban on Glyphosate

Short Term

## Increased Operational Cost

### 9-25x's more than current budget

- Labor
- Materials
- Responding to Public Outcry
- Loss of Grant Funding
- Re-development of IPM Plan
- Additional Training
- New Equipment
- Increased abatement of Transient Camps
- Reduction in Parks and Rec Services in order to compensate for additional labor and materials
- Amending Existing MAD's Contracts
- Loss of MAD's Contractors
- Re-balloting of 40-50 MAD's when maintenance cost increase

## Impediments to Development

- No new wetland mitigation projects approved
- Not meeting success criteria for current mitigation areas
- Increased endowment cost for property acquisitions
- Inadequate endowment for parcels recently acquired

## Large Increase in Mitigation Cost

### For Wetland and Upland Mitigation Projects

- Future and existing CIP and Public Projects with the potential for impacts to Environmentally Sensitive Lands (ESL) would be subject to Increased :
  - ♦ Mitigation ratios
  - ♦ Duration of required maintenance and monitoring programs
- Existing Advanced Permittee Responsible Mitigation Projects (aka San Diego River Mitigation Project) would also take longer to reach milestones for releasing mitigation credits (Vital to multiple departments projects)
- New CIP or Public Projects requiring mitigation would likely not be approved due to uncertainty of mitigation success

## Environmental Impacts:

- No Viable Alternative for treatment around water or wetlands
- Increased Non-native plant populations
- Loss of functional value for wetlands (including vernal pools)
- Inability to respond to new invasive plant infestations
- Organic alternative is untested in Open Space and may pose a greater risk for ecosystem damage
- Increase in transient encampments
- Loss of Preserve Habitat
- Potential for local/ or global extinction of
- Threatened and/or Endangered Species
- Loss of conservation partners / non-profits and volunteers
- Decrease in other MAD's services (tree trimming etc.) to account for increased non-native weed management
- No adaptation in weed management for one year due to FY2020 budget being set already.

## Long Term MAD's Impacts

- New MAD's would likely not be approved due to increased cost of non-native plant management
- Inability of Open Space adjacent residences and commercial business to get adequate insurance due to additional risk of wildfire while in proximity to unmaintained Open Space

## Loss of MSCP<sup>1</sup> and VPHCP<sup>2</sup> Take Authority<sup>3</sup>.

- All development projects with the potential for impacts to covered species would require a independent consultation with US Fish and Wildlife Service. This would usher in a great deal of uncertainty and extensive delays in project planning and development , and gives the Federal Government a nexus with which to weigh in on public and private development across the city.
- Failure to meet the criteria set forth in these programs could result in additional lawsuits from Federal or State Government Agencies or conservation groups .
- Revocation of our "Take Authority" which is delegated to the City of San Diego through the approval of these programs

## Long Term

### Environmental Impacts

- Local and global **EXTICNTION** of our rarest plant and animal species due to habitat loss and non-native weed encroachment
- Extensive reduction in **Climate Resili-ency** due to habitat type conversion and the frequency and intensity of wildfire

Long Term

**1: MSCP** refers to the Multi-Species Conservation Plan which is a Federally approved program which allows the City of San Diego to determine potential impacts of sensitive species within the city hardline preserve the Multi-Habitat Planning Area (MHPA) without needing to consult the Federal or State Wildlife Resource Agencies. This program was adopted in 1996 and has been instrumental in streamlining development of public and private projects within the MHPA

**2: VPHCP** refers to the Vernal Pool Habitat Conservation Plan, which is a Federally approved program which allows the City of San Diego to determine potential impacts to the extremely rare and sensitive species that inhabit vernal pool ecosystems, without consultation from the Federal and State Wildlife Resource Agencies . The city spent a decade developing this program in response to a lawsuit brought by Environmental Organizations. The program is in its first full year of implementation in 2019.

**3: Take Authority** is when a federal agency (USFWS) extends its federally granted endangered species permit to an entity based on an approved Habitat Conservation Plan. The city of San Diego has two of these plans the MSCP and VPHCP

Failure to meet the criteria set forth in these programs could result in additional lawsuits from conservation groups and the Federal or State Government Agencies. Revocation of our “Take Authority” which is delegated to the City of San Diego through the approval of these programs

