

**APPENDIX K:
MULTIPLE SPECIES
CONSERVATION PLAN SUBAREA CONSISTENCY**

APPENDIX K

Table K-1 Proposed Project Consistency Analysis with the City of San Diego Subarea Plan

MSCP Subarea Plan Policy or Guideline	Consistency Discussion	Determination
Section 1.4.2 – General Planning Policies and Design Guidelines		
Roads and Utilities - Construction and Maintenance Policies		
<p>1. All proposed utility lines (e.g., sewer, water, etc.) should be designed to avoid or minimize intrusion into the MHPA. These facilities should be routed through developed or developing areas rather than the MHPA, where possible. If no other routing is feasible, then the lines should follow previously existing roads, easements, rights-of-way and disturbed areas, minimizing habitat fragmentation.</p>	<p>Most of the Proposed Project would be located within SDG&E ROW with the underground portion (Segment B) located within City of San Diego franchise ROW. Portions of the SDG&E ROW are located within MHPA. SDG&E designed the project to minimize intrusion to MHPA areas within the SDG&E ROW by relocating poles to reduce habitat impacts. Permanent and temporary impacts to sensitive vegetation communities within the MHPA would be mitigated according to Mitigation Measure Biology-6. Mitigation Measure Biology-6 requires SDG&E to prepare and implement a Habitat Restoration Plan. The Habitat Restoration Plan would include specifics on the restoration protocols for impacted areas and would include mitigation ratios that are consistent with the MSCP.</p>	Consistent
<p>2. All new development for utilities and facilities within or crossing the MHPA shall be planned, designed, located and constructed to minimize environmental impacts. All such activities must avoid disturbing the habitat of MSCP covered species, and wetlands. If avoidance is infeasible, mitigation will be required.</p>	<p>As discussed above, the Proposed Project would be located within SDG&E ROW and City of San Diego franchise ROW but would still result in impacts to MHPA. A total of 1.55 acres of MHPA would be permanently impacted, a total of 22.03 acres of sensitive vegetation communities within the MHPA would be temporarily impacted, and 3.34 acres of sensitive vegetation communities within the MHPA would be impacted from access road maintenance during construction of the Proposed Project. Mitigation Measure Biology-6 requires restoration of all permanently and temporarily impacted sensitive vegetation communities within the MHPA according to the Habitat Restoration Plan that would be prepared by SDG&E.</p>	Consistent
<p>3. Temporary construction areas and roads, staging areas, or permanent access roads must not disturb existing habitat unless determined to be unavoidable. All such activities must occur on existing agricultural lands or in other disturbed areas rather than in habitat. If temporary habitat disturbance is unavoidable, then restoration of, and/or mitigation for, the disturbed area after project completion will be required.</p>	<p>To the extent possible, temporary staging yards, access roads, and work areas would be located in areas that were previously disturbed. There would still be some sensitive vegetation communities that the Proposed Project could impact from the use of these temporary construction areas. SDG&E would be required to restore temporarily impacted areas according to Mitigation Measure Biology-6, which includes mitigation ratios</p>	Consistent

APPENDIX K
MULTIPLE SPECIES CONSERVATION PLAN SUBAREA CONSISTENCY

MSCP Subarea Plan Policy or Guideline	Consistency Discussion	Determination
	consistent with the MSCP.	
<p>4. Construction and maintenance activities in wildlife corridors must avoid significant disruption of corridor usage. Environmental documents and mitigation monitoring and reporting programs covering such development must clearly specify how this will be achieved, and construction plans must contain all the pertinent information and be readily available to crews in the field. Training of construction crews and field workers must be conducted to ensure that all conditions are met. A responsible party must be specified.</p>	<p>A total of 1.55 acres of MHPA would be permanently impacted, a total of 22.03 acres of sensitive vegetation communities within the MHPA would be temporarily impacted, and 3.34 acres of sensitive vegetation communities within the MHPA would be impacted from access road maintenance during construction of the Proposed Project. To avoid significant disruption to corridor usage from the impacts to MHPA lands, SDG&E would implement mitigation measures.</p> <p>Mitigation Measure Biology-1 would include activity protocols to minimize impact and would include an environmental training program to inform construction staff on operational protocols that must be met. Mitigation Measure Biology-6 would require the revegetation of MHPA sensitive areas impacted by construction of the Proposed Project. A Restoration Plan would be developed that would include all pertinent information for restoration, including success criteria, mitigation ratios, and monitoring required. The restoration plan would be available to all personnel involved in restoration.</p>	Consistent
<p>5. Roads in the MHPA will be limited to those identified in Community Plan Circulation Elements, collector streets essential for area circulation, and necessary maintenance/emergency access roads. Local streets should not cross the MHPA except where needed to access isolated development areas.</p>	<p>The Proposed Project would mostly use existing maintenance access roads during construction and maintenance of the Proposed Project. SDG&E does propose to construct some new temporary access roads, three of which would cross the MHPA. Three new access roads would be constructed along Segment D to access Poles #45 and #46. These temporary access roads would be constructed to avoid sensitive resources, such as vernal pools and road rut pools. These three access roads would only be used during the construction of the Proposed Project, for a maximum of 12 months. Sensitive communities impacted by the construction of access roads would be restored according to the Habitat Restoration Plan, per Mitigation Measure Biology-6. The Proposed Project would not permanently increase the amount of access roads within the MHPA.</p>	Consistent

**APPENDIX K
MULTIPLE SPECIES CONSERVATION PLAN SUBAREA CONSISTENCY**

MSCP Subarea Plan Policy or Guideline	Consistency Discussion	Determination
<p>6. Development of roads in canyon bottoms should be avoided whenever feasible. If an alternative location outside the MHPA is not feasible, then the road must be designed to cross the shortest length possible of the MHPA in order to minimize impacts and fragmentation of sensitive species and habitat. If roads cross the MHPA, they should provide for fully-functional wildlife movement capability. Bridges are the preferred method of providing for movement, although culverts in selected locations may be acceptable. Fencing, grading and plant cover should be provided where needed to protect and shield animals, and guide them away from roads to appropriate crossings.</p>	<p>SDG&E would mostly rely on the use of existing access roads. No access roads would be constructed in canyon bottoms. As noted above, three temporary access roads would be constructed within the MHPA and would be restored to pre-construction conditions following construction of the Proposed Project.</p>	<p>Consistent</p>
<p>7. Where possible, roads within the MHPA should be narrowed from existing design standards to minimize habitat fragmentation and disruption of wildlife movement and breeding areas. Roads must be located in lower quality habitat or disturbed areas to the extent possible.</p>	<p>SDG&E would rely mostly on the use of existing access roads, but as noted above, three new temporary access roads would be constructed within the MHPA. These three temporary access roads would be between 12 and 15 feet wide and would be narrower where feasible. The three temporary access roads would be restored to pre-construction conditions, which would minimize habitat fragmentation and disruption of wildlife movement and breeding areas.</p>	<p>Consistent</p>
<p>8. For the most part, existing roads and utility lines are considered a compatible use within the MHPA and therefore will be maintained. Exceptions may occur where underutilized or duplicative road systems are determined not to be necessary as identified in the Framework Management Section 1.5.</p>	<p>As noted above, three temporary access roads would be constructed within the MHPA and would be restored to pre-construction conditions after construction of the Proposed Project.</p>	<p>Consistent</p>
<p>Fencing, Lighting, and Signage</p>		
<p>1. Fencing or other barriers will be used where it is determined to be the best method to achieve conservation goals and adjacent to land uses incompatible with the MHPA. For example, use chain link or cattle wire to direct wildlife to appropriate corridor crossings, natural rocks/boulders or split rail fencing to direct public access to appropriate locations, and chain link to provide added protection of certain sensitive species or habitats (e.g., vernal pools).</p>	<p>SDG&E would use orange construction fencing and/or flagging to delineate sensitive habitats supporting rare plants or vernal pools to be avoided. No other fencing is considered in the Proposed Project for work areas in or adjacent to the MHPA. Public use of existing trails might be temporarily halted during specific construction activities for public safety; however, the Proposed Project would not alter public or wildlife access or use of the MHPA.</p>	<p>Consistent</p>

APPENDIX K
MULTIPLE SPECIES CONSERVATION PLAN SUBAREA CONSISTENCY

MSCP Subarea Plan Policy or Guideline	Consistency Discussion	Determination
<p>2. Lighting shall be designed to avoid intrusion into the MHPA and effects on wildlife. Lighting in areas of wildlife crossings should be of low sodium or similar lighting. Signage will be limited to access and litter control and educational purposes.</p>	<p>The Proposed Project could require lighting on proposed structures to meet FAA requirements. The number of structures that would require lighting is dependent upon consultation with the FAA; nine structures trigger FAA notification. Lighting on these structures would be required for aviation safety and would consist of steady burn red lights and flashing red lights at the top of proposed structures several dozen feet above the ground. Temporary security lighting would be required at staging yards and storage areas during construction. SDG&E would implement APM AES-4 and Mitigation Measure Aesthetics-2 which require temporary lighting to be directed on site and away from sensitive receptors and adjacent habitat areas. Lighting would be shielded from the MHPA.</p> <p>SDG&E proposed to implement APM AES-5 to reduce the glare from structures. APM AES-5 requires SDG&E to use dulled galvanized steel, non-specular conductors, and fences with dull, non-reflective finish or vinyl coating.</p> <p>The Proposed Project does not include any permanent signage.</p>	<p>Consistent</p>
<p>Materials Storage</p>		
<p>Prohibit storage of materials (e.g., hazardous or toxic, chemicals, equipment, etc.) within the MHPA and ensure appropriate storage per applicable regulations in any areas that may impact the MHPA, especially due to potential leakage.</p>	<p>The Proposed Project would require the use of hazardous materials for construction and operation and maintenance of the Proposed Project. Table 4.11-6 in Section 4.11: Hazards and Hazardous Materials provides a list of the hazardous materials that would be used. Hazardous materials would only be stored at the proposed staging yards (SR-56, Torrey Santa Fe, Evergreen Nursery, Camino Del Sur, Chicarita South, Stowe, and Stonebridge). These staging yards are not located within the MHPA. The Torrey Santa Fe, Camino Del Sur, and Chicarita South staging yards are located close to the MHPA. SDG& would implement APMs and mitigation measures to reduce the potential for impacts resulting from the use and storage of hazardous materials.</p> <p>APM HAZ-1 requires that SDG&E prepare a Safety and Environmental Awareness Program (SEAP), APM HAZ-2 requires SDG&E to follow standard operating procedures consistent with state and federal regulations including spill containment and</p>	<p>Consistent</p>

**APPENDIX K
MULTIPLE SPECIES CONSERVATION PLAN SUBAREA CONSISTENCY**

MSCP Subarea Plan Policy or Guideline	Consistency Discussion	Determination
	<p>daily vehicle inspection, and APM HAZ-3 requires SDG&E contractors to implement their own compliance management programs to ensure that regulatory requirements are adhered to and that worker and public safety are secured. Mitigation Measure Hazards-1 requires that storage of hazardous materials used for controlled detonation follow federal, state, and local City of San Diego regulations. Mitigation Measure Hazards-2 requires preparation and implementation of a Spill Prevention Containment and Countermeasure (SPCC) Plan, the provisions of which require that all on-site personnel receive training to prevent spills or leaks from reaching waterways and leaving Proposed Project sites. Mitigation Measure Hazards-3 requires SDG&E to prepare and implement a Hazardous Substance Control and Emergency Response Plan (HSCERP) as part of the project-specific SWPPP. Mitigation Measure Biology-3 requires that herbicide applications follow EPA label instructions and follow operational protocols to minimize herbicide drift. These measures would reduce the potential for impacts associated with the storage and use of hazardous materials.</p>	
Mining, Extraction, and Processing Facilities		
<p>1. Mining operations include mineral extraction, processing and other related mining activities (e.g., asphaltic processing). Currently permitted mining operations that have approved restoration plans may continue operating in the MHPA. New or expanded mining operations on lands conserved as part of the MHPA are incompatible with MSCP preserve goals for covered species and their habitats unless otherwise agreed to by the wildlife agencies at the time the parcel is conserved.</p> <p>New operations are permitted in the MHPA if: 1) impacts have been assessed and conditions incorporated to mitigate biological impacts and restore mined areas; 2) adverse impacts to covered species in the MHPA have been mitigated consistent with the Subarea Plan; and 3) requirements of other City land use policies and regulations (e.g., Adjacency Guidelines, Conditional Use Permit) have been satisfied.</p>	<p>The Proposed Project would not include any mining extraction, or other processing facilities within the MHPA.</p>	<p>Not Applicable</p>

**APPENDIX K
MULTIPLE SPECIES CONSERVATION PLAN SUBAREA CONSISTENCY**

MSCP Subarea Plan Policy or Guideline	Consistency Discussion	Determination
<p>Existing and any newly permitted operations adjacent to or within the MHPA shall meet noise, air quality and water quality regulation requirements, as identified in the conditions of any existing or new permit, in order to adequately protect adjacent preserved areas and covered species. Such facilities shall also be appropriately restored upon cessation of mining activities.</p>		
<p>2. All mining and other related activities must be consistent with the objectives, guidelines, and recommendations in the MSCP plan, the City of San Diego's Environmentally Sensitive Lands Ordinance, all relevant long-range plans, as well as with the State Surface Mining and Reclamation Act (SMARA) of 1975.</p>	<p>The Proposed Project would not include any mining extraction, or other processing facilities within the MHPA.</p>	<p>Not Applicable</p>
<p>3. Any sand removal activities should be monitored for noise impacts to surrounding sensitive habitats, and all new sediment removal or mining operations proposed in proximity to the MHPA, or changes in existing operations, must include noise reduction methods that take into consideration the breeding and nesting seasons of sensitive bird species.</p>	<p>The Proposed Project would not include any mining extraction, or other processing facilities within the MHPA.</p>	<p>Not Applicable</p>
<p>4. All existing and future mined lands adjacent to or within the MHPA shall be reclaimed pursuant to SMARA. Ponds are considered compatible uses where they provide native wildlife and wetland habitats and do not conflict with conservation goals of the MSCP and Subarea Plan.</p>	<p>The Proposed Project would not include any mining extraction, or other processing facilities within the MHPA.</p>	<p>Not Applicable</p>
<p>5. Any permitted mining activity including reclamation of sand must consider changes and impacts to water quality, water table level, fluvial hydrology, flooding, and wetlands and habitats upstream and downstream, and provide adequate mitigation.</p>	<p>The Proposed Project would not include any mining extraction, or other processing facilities within the MHPA.</p>	<p>Not Applicable</p>

**APPENDIX K
MULTIPLE SPECIES CONSERVATION PLAN SUBAREA CONSISTENCY**

MSCP Subarea Plan Policy or Guideline	Consistency Discussion	Determination
Flood Control		
1. Flood control should generally be limited to existing agreements with resource agencies unless demonstrated to be needed based on a cost benefit analysis and pursuant to a restoration plan. Floodplains within the MHPA, and upstream from the MHPA if feasible, should remain in a natural condition and configuration in order to allow for the ecological, geological, hydrological, and other natural processes to remain or be restored.	The Proposed Project would not involve any flood control activities.	Not Applicable
2. No berming, channelization, or man-made constraints or barriers to creek, tributary, or river flows should be allowed in any floodplain within the MHPA unless reviewed by all appropriate agencies, and adequately mitigated. Review must include impacts to upstream and downstream habitats, flood flow volumes, velocities and configurations, water availability, and changes to the water table level.	The Proposed Project would not involve berming, channelization, or man-made constraints or barriers to creek, tributary, or river flows. The Proposed Project would not place any new structures within flood zones.	Not Applicable
3. No riprap, concrete, or other unnatural material shall be used to stabilize river, creek, tributary, and channel banks within the MHPA. River, stream, and channel banks shall be natural, and stabilized where necessary with willows and other appropriate native plantings. Rock gabions may be used where necessary to dissipate flows and should incorporate design features to ensure wildlife movement.	The Proposed Project would not involve the stabilization of a river, stream, or channel bank within the MHPA.	Not Applicable
Section 1.4.3 – Land Use Adjacency Guidelines		
1. Drainage. All new and proposed parking lots and developed areas in adjacent to the preserve must not drain directly into the MHPA. All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials, and other elements that might degrade or harm the natural environment or ecosystem processes within the MHPA. This can be accomplished using a variety of methods including natural detention basins, grass swales or mechanical trapping devices. These systems should be maintained approximately once a year, or as often as	The Proposed Project would not significantly increase the amount of impermeable services within or near the MHPA. A total of 0.14 acres of impervious surfaces would be created within the transmission corridor from the construction of pole foundations. While the transmission line does cross the MHPA, there would not be a significant increase in runoff to the MHPA from the construction of the Proposed Project. SDG&E would implement APMs and mitigation measures to prevent the release of hazardous materials to the MHPA. The	Consistent

APPENDIX K MULTIPLE SPECIES CONSERVATION PLAN SUBAREA CONSISTENCY

MSCP Subarea Plan Policy or Guideline	Consistency Discussion	Determination
<p>needed, to ensure proper functioning. Maintenance should include dredging out sediments if needed, removing exotic plant materials, and adding chemical-neutralizing compounds (e.g. clay compounds) when necessary and appropriate.</p>	<p>construction and operation and maintenance of the Proposed Project would involve the use of hazardous materials (see Table 4.11-6). APM HYDRO-1 requires implementation of protocols for use, transport, and disposal of hazardous materials and would minimize the potential for the generation of polluted runoff. APM HAZ-1 requires SDG&E to implement an environmental awareness program that would include training on hazardous materials protocols and BMPs. APM HAZ-2 requires implementation of standard operational procedures for the transport, use, storage, and disposal of hazardous materials. APM HAZ-4 requires adherence to SDG&E protocols for herbicide application. These measures will prevent the release of hazardous materials to the MHPA.</p> <p>SDG&E would restore all temporary and permanent impacts to MHPA according to Mitigation Measure Biology-6, which includes the removal of exotic plants.</p>	
<p>2. Toxics. Land uses, such as recreation and agriculture, that use chemicals or generate by-products such as manure, that are potentially toxic or impactive to wildlife, sensitive species, habitat, or water quality need to incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA. Such measures should include drainage/ detention basins, swales, or holding areas with non-invasive grasses or wetland-type native vegetation to filter out the toxic materials. Regular maintenance should be provided. Where applicable, this requirement should be incorporated into leases on publicly-owned property as leases come up for renewal.</p>	<p>The Proposed Project would construct a transmission line, which would not generate chemicals or toxic by-products. The Proposed Project would involve the use of some hazardous materials and as discussed above in Section 1.4.2: General Planning Policies and Design Guidelines: Materials Storage and Section 1.4.3 Land Use Adjacency Guidelines, Part 1: Drainage, SDG&E would implement APMs and mitigation measures to reduce impacts to the MHPA.</p>	Consistent
<p>3. Lighting. Lighting of all developed areas adjacent to the MHPA should be directed away from the MHPA. Where necessary, development should provide adequate shielding with non-invasive plant materials (preferably native), berming, and/or other methods to protect the MHPA and sensitive species from night lighting.</p>	<p>The Proposed Project could require lighting on proposed structures to meet FAA requirements. The number of structures that would require lighting is dependent upon consultation with the FAA; nine structures trigger FAA notification. Lighting on these structures would be required for aviation safety and would consist of steady burn red lights and flashing red lights at the top of proposed structures several dozen feet above the ground.</p> <p>Temporary security lighting would be required at staging yards</p>	Consistent

APPENDIX K
MULTIPLE SPECIES CONSERVATION PLAN SUBAREA CONSISTENCY

MSCP Subarea Plan Policy or Guideline	Consistency Discussion	Determination
	<p>and storage areas during construction. SDG&E would implement APM AES-4 and Mitigation Measure Aesthetics-2 which require temporary lighting to be directed on site and away from sensitive receptors and adjacent habitat areas. Lighting would be shielded from the MHPA.</p> <p>SDG&E proposed to implement APM AES-5 to reduce the glare from structures. APM AES-5 requires SDG&E to use dulled galvanized steel, non-specular conductors, and fences with dull, non-reflective finish or vinyl coating.</p>	
<p>4. Noise. Uses in or adjacent to the MHPA should be designed to minimize noise impacts. Berms or walls should be constructed adjacent to commercial areas, recreational areas, and any other use that may introduce noises that could impact or interfere with wildlife utilizations of the MHPA. Excessively noisy uses or activities adjacent to breeding areas must incorporate noise reduction measures and be curtailed during the breeding season of sensitive species. Adequate noise reduction measures should also be incorporated for the rest of the year.</p>	<p>The Proposed Project would not introduce any new, substantial, permanent sources of noise. Noise generated from construction would be temporary and would last for 12 months.</p> <p>SDG&E proposes to implement mitigation to reduce potential impacts to sensitive special-status species from noise. Mitigation Measure Biology-7 would require SDG&E to avoid impacts to nesting birds by establishing buffers for nesting birds during the nesting season. In addition Mitigation Measure Biology-7 minimizes potential impacts from noise to the coastal California gnatcatcher and least Bell's vireo. Where there is potential nesting habitat for the coastal California gnatcatcher or least Bell's vireo within or adjacent to the MHPA, construction or operation/maintenance noise that exceeds the hourly average threshold of 60 decibels shall be avoided during these species' breeding seasons. SDG&E would also implement Mitigation Measure Biology-9, which would establish buffers for special-status bats to reduce the potential impacts from noise.</p>	<p>Consistent</p>
<p>5. Barriers. New development adjacent to the MHPA may be required to provide barriers (e.g. non-invasive vegetation, rocks/ boulders, fences, walls, and/or signage) along the MHPA boundaries to direct public access to appropriate locations and reduce domestic animal predation.</p>	<p>This guideline would not be applicable because the Proposed Project is a utility project within SDG&E ROW in the MHPA.</p>	<p>Not Applicable</p>
<p>6. Invasives. No invasive non-native plant species shall be introduced in areas adjacent to the MHPA.</p>	<p>SDG&E would implement a Weed Control Plan, per Mitigation Measure Biology-3, which would avoid the introduction of non-native plant species to the MHPA.</p>	<p>Consistent</p>

**APPENDIX K
MULTIPLE SPECIES CONSERVATION PLAN SUBAREA CONSISTENCY**

MSCP Subarea Plan Policy or Guideline	Consistency Discussion	Determination
<p>7. Brush Management. New residential development located adjacent to and topographically above the MHPA (e.g. along canyon edges) must be set back from slope edges to incorporate Zone 1 brush management areas on the development pad and outside of the MHPA. Zone 2 and 3 will be combined into one zone (Zone 2) and may be located in the MHPA upon granting of an easement to the City (or other acceptable agency) except where narrow wildlife corridors require it to be located outside of the MHPA. Zone 2 will be increased by 30 feet, except in areas with a low fire hazard severity rating where no Zone 2 would be required. Brush management zones will not be greater in size that is currently required by the City's regulations. The amount of woody vegetation clearing shall not exceed 50% of the vegetation existing when the initial clearing is done. Vegetation clearing shall be done consistent with City standards and shall avoid/minimize impacts to covered species to the maximum extent possible. For all new development, regardless of the ownership, the brush management in the Zone 2 area will be the responsibility of a homeowners association or other private party. For existing project and approved projects, the brush management zones, standards, and locations, and clearing techniques will not change from those required under existing regulations.</p>	<p>This guideline is not applicable because the Proposed Project is a utility project and not a residential development project.</p> <p>The Proposed Project would, however, implement brush management. Work spaces around poles would be cleared of shrubs and other obstructions for inspection and maintenance purposes, consistent with SDG&E's current vegetation management practices (CPUC General Order 95, and PRC Sections 4292 and 4293). Vegetation around poles fitted with specific non-exempt hardware (e.g., fuses, switches) would be cleared to a radius of 10 feet from the base of the pole. Vegetation around poles with external grounds would be cleared to a radius of 5 feet from the pole base.</p>	<p>Not Applicable</p>
<p>8. Grading/Land Development. Manufactured slopes associated with site development shall be included within the development footprint for projects within or adjacent to the MHPA.</p>	<p>The Proposed Project would construct manufactured slopes and retaining walls where necessary to support access to and maintenance of individual transmission structures within existing SDG&E ROW. The scale of manufactured slopes would be small. Manufactured slopes would be revegetated to pre-construction conditions according to restoration requirements per Mitigation Measure Biology-6.</p>	<p>Consistent</p>

APPENDIX K
MULTIPLE SPECIES CONSERVATION PLAN SUBAREA CONSISTENCY

MSCP Subarea Plan Policy or Guideline	Consistency Discussion	Determination
Section 1.5.2 – General Management Directives		
Mitigation		
<p>Mitigation, when required as part of project approvals, shall be performed in accordance with the City of San Diego Environmentally Sensitive Lands Ordinance and Biology Guidelines.</p>	<p>A total of 1.55 acres of MHPA would be permanently impacted, a total of 22.03 acres of sensitive vegetation communities within the MHPA would be temporarily impacted, and 3.34 acres of sensitive vegetation communities within the MHPA would be impacted from access road maintenance during construction of the Proposed Project. Mitigation Measure Biology-6 includes compensatory mitigation ratios that are consistent with the City of San Diego Environmentally Sensitive Lands Ordinance and Biology Guidelines.</p>	<p>Consistent</p>
Restoration		
<p>Restoration or revegetation undertaken in the MHPA shall be performed in a manner acceptable to the City. Where covered species status identifies the need for reintroduction and/or increasing the population, the covered species will be included in restoration/revegetation plans, as appropriate. Restoration or revegetation proposals will be required to prepare a plan that includes elements addressing financial responsibility, site preparation, planting specifications, maintenance, monitoring and success criteria, and remediation and contingency measures. Wetland restoration/ revegetation proposals are subject to permit authorization by federal and state agencies.</p>	<p>SDG&E would prepare and implement a Habitat Restoration Plan to revegetate all temporary impacts to sensitive habitats per Mitigation Measure Biology-6. Mitigation Measure Biology-6 follows the minimum requirements and mitigation ratios established in the MSCP Subarea Plan and the City of San Diego Environmentally Sensitive Lands Ordinance and Biology Guidelines. Mitigation Measure Biology-6 requires that the habitat restoration plan identify the need for reintroduction and/or increasing the population for species covered by the MSCP. In addition, Mitigation Measure Biology-6 requires that the Habitat Restoration Plan address financial responsibility, site preparation, planting specifications, maintenance, monitoring and success criteria, and remediation and contingency measures. SDG&E would obtain the appropriate state and federal permits for work within waters of the state and waters of the U.S.</p>	<p>Consistent</p>
Public Access, Trails, and Recreation (Priority 1)		
<p>1. Provide sufficient signage to clearly identify public access to the MHPA. Barriers such as vegetation, rocks/boulders or fencing may be necessary to protect highly sensitive areas. Use appropriate type of barrier based on location, setting and use. For example, use chain link or cattle wire to direct</p>	<p>This guideline is no applicable because the existing SDG&E maintenance access roads are already commonly utilized as dual purpose trails. No barriers are necessary.</p>	<p>Not Applicable</p>

**APPENDIX K
MULTIPLE SPECIES CONSERVATION PLAN SUBAREA CONSISTENCY**

MSCP Subarea Plan Policy or Guideline	Consistency Discussion	Determination
wildlife movement, and natural rocks/boulders or split rail fencing to direct public access away from sensitive areas. Lands acquired through mitigation may preclude public access in order to satisfy mitigation requirements.		
2. Locate trails, view overlooks, and staging areas in the least sensitive areas of the MHPA. Locate trails along the edges of urban land uses adjacent to the MHPA, or the seam between land uses (e.g., agriculture/habitat), and follow existing dirt roads as much as possible rather than entering habitat or wildlife movement areas. Avoid locating trails between two different habitat types (ecotones) for longer than necessary due to the typically heightened resource sensitivity in those locations.	The Proposed Project would not involve the creation of trails.	Not Applicable
3. In general, avoid paving trails unless management and monitoring evidence shows otherwise. Clearly demarcate and monitor trails for degradation and off-trail access and use. Provide trail repair/ maintenance as needed. Undertake measures to counter the effects of trail erosion including the use of stone or wood crossjoints, edge plantings of native grasses, and mulching of the trail.	The Proposed Project would not involve the paving of any trails or the construction of any paved access roads that could potentially be used as trails.	Not Applicable
4. Minimize trail widths to reduce impacts to critical resources. For the most part, do not locate trails wider than four feet in core areas or wildlife corridors. Exceptions are in the San Pasqual Valley where other agreements have been made, in Mission Trails Regional Park, where appropriate, and in other areas where necessary to safely accommodate multiple uses or disabled access. Provide trail fences or other barriers at strategic locations when protection of sensitive resources is required.	The Proposed Project would not involve the creation of trails.	Not Applicable
5. Limit the extent and location of equestrian trails to the less sensitive areas of the MHPA. Locate staging areas for equestrian uses at a sufficient distance (e.g., 300-500 feet) from areas with riparian and coastal sage scrub habitats to ensure that the biological values are not impaired.	The Proposed Project would not involve the creation of equestrian trails.	Not Applicable

**APPENDIX K
MULTIPLE SPECIES CONSERVATION PLAN SUBAREA CONSISTENCY**

MSCP Subarea Plan Policy or Guideline	Consistency Discussion	Determination
6. Off-road or cross-country vehicle activity is an incompatible use in the MHPA, except for law enforcement, preserves management or emergency purposes. Restore disturbed areas to native habitat where possible or critical, or allow to regenerate.	The Proposed Project would not involve off-road or cross-country vehicle activity within any portions of the SDG&E ROW, including those areas that are within the MHPA. All temporary and permanent disturbance areas would be restored or mitigated, per Mitigation Measure Biology-6.	Not Applicable
7. Limit recreational uses to passive uses such as bird watching, photography and trail use. Locate developed picnic areas near MHPA edges or specific areas within the MHPA, in order to minimize littering, feeding of wildlife, and attracting or increasing populations of exotic or nuisance wildlife (opossums, raccoons, skunks). Where permitted, restrain pets on leashes.	The Proposed Project would not involve the creation of additional recreational uses.	Not Applicable
8. Remove homeless and itinerant worker camps in habitat areas as soon as found pursuant to existing enforcement procedures.	This guideline is not applicable because it is outside of the purview of SDG&E.	Not Applicable
9. Maintain equestrian trails on a regular basis to remove manure (and other pet feces) from the trails and preserve system in order to control cowbird invasion and predation. Design and maintain trails where possible to drain into a gravel bottom or vegetated (e.g., grass-lined) swale or basin to detain runoff and remove pollutants.	This guideline is not applicable because the Proposed Project would not create any equestrian or hiking trails.	Not Applicable
Litter/Trash and Materials Storage		
Priority 1		
1. Remove litter and trash on a regular basis. Post signage to prevent and report littering in trail and road access areas. Provide and maintain trash cans and bins at trail access points.	The Proposed Project would implement operational protocols that prohibit littering within the SDG&E ROW and adjacent properties.	Consistent
2. Impose penalties for littering and dumping. Fines should be sufficient to prevent recurrence and also cover reimbursement of costs to remove and dispose of debris, restore the area if needed, and to pay for enforcement staff time.	The Proposed Project would implement operational protocols that prohibit littering within the SDG&E ROW and adjacent properties.	Consistent

**APPENDIX K
MULTIPLE SPECIES CONSERVATION PLAN SUBAREA CONSISTENCY**

MSCP Subarea Plan Policy or Guideline	Consistency Discussion	Determination
3. Prohibit permanent storage of materials (e.g., hazardous and toxic chemicals, equipment, etc.) within the MHPA and ensure appropriate storage per applicable regulations in any areas that may impact the MHPA, due to potential leakage.	SDG&E would not store any hazardous materials within the MHPA and would implement APMs and mitigation measures to avoid any potential releases of hazardous materials. SDG&E would follow all federal, state, and local regulations related to storage of hazardous materials.	Consistent
4. Keep wildlife corridor under crossings free of debris, trash, homeless encampments, and all other obstructions to wildlife movement.	SDG&E does not have responsibility for any wildlife corridor under crossings in the Proposed Project area; however, SDG&E does perform operation and maintenance activities along the transmission corridor ROW. Operation and maintenance activities include maintaining the entire ROW, including those areas within the MHPA, free of debris, trash, and other obstructions.	Consistent
Priority 2		
1. Evaluate areas where dumping recurs for the need for barriers. Provide additional monitoring as needed (possibly by local and recreational groups on a "Neighborhood Watch" type program), and/or enforcement.	This guideline is not applicable because this is outside of the purview of SDG&E.	Not Applicable
Adjacency Management Issues (Priority 1)		
1. Enforce, prevent and remove illegal intrusions into the MHPA (e.g., orchards, decks, etc.) on an annual basis, in addition to complaint basis.	This guideline is not applicable because this is outside of the purview of SDG&E.	Not Applicable
2. Disseminate educational information to residents adjacent to and inside the MHPA to heighten environmental awareness, and inform residents of access, appropriate plantings, construction or disturbance within MHPA boundaries, pet intrusion, fire management, and other adjacency issues.	SDG&E disseminates educational information to the residents of San Diego County through their Environmental Champions initiative, which supports non-profit organizations that implement environmental education programs and environmental community engagement programs. The programs focus on natural resource conservation and protection, habitat preservation, restoration, and recycling.	Consistent
3. Install barriers (fencing, rocks/boulders, vegetation) and/or signage where necessary to direct public access to appropriate locations.	This guideline is no applicable because the existing SDG&E maintenance access roads already commonly serve a dual purpose as trails. No barriers are necessary.	Not Applicable

**APPENDIX K
MULTIPLE SPECIES CONSERVATION PLAN SUBAREA CONSISTENCY**

MSCP Subarea Plan Policy or Guideline	Consistency Discussion	Determination
Invasives / Exotics Control		
Priority 1		
<p>1. Do not introduce invasive non-native species into the MHPA. Provide information on invasive plants and animals harmful to the MHPA, and prevention methods, to visitors and adjacent residents. Encourage residents to voluntarily remove invasive exotics from their landscaping.</p>	<p>SDG&E would implement a Weed Control Plan under Mitigation Measure Biology-3 to prevent the introduction of invasive non-native species to the MHPA. The Weed Control Plan would be implemented throughout the SDG&E ROW and would include specific weed abatement methods, practices, and treatment timing developed in consultation with the San Diego County Agriculture Commissioner's Office and the California Invasive Plant Council (Cal-IPC).</p>	<p>Consistent</p>
<p>2. Remove giant reed, tamarisk, pampas grass, castor bean, artichoke thistle, and other exotic invasive species from creek and river systems, canyons and slopes, and elsewhere within the MHPA as funding or other assistance becomes available. If possible, it is recommended that removal begin upstream and/or upwind and move downstream/downwind to control reinvasion.</p> <p>Priorities for removal should be based on invasive species' biology (time of flowering, reproductive capacity, etc.), the immediate need of a specific area, and where removal could increase the habitat available for use by covered species such as the least Bell's vireo. Avoid removal activities during the reproductive seasons of sensitive species and avoid/ minimize impacts to sensitive species or native habitats. Monitor the areas and provide additional removal and apply herbicides if necessary.</p> <p>If herbicides are necessary, all safety and environmental regulations must be observed. The use of heavy equipment, and any other potentially harmful or impact-causing methodologies, to remove the plants may require some level of environmental or biological review and/or supervision to ensure against impacts to sensitive species.</p>	<p>SDG&E would implement a Weed Control Plan under Mitigation Measure Biology-3 to prevent the introduction of invasive non-native species to the MHPA. The Weed Control Plan would be implemented throughout the SDG&E ROW and would include specific weed abatement methods, practices, and treatment timing developed in consultation with the San Diego County Agriculture Commissioner's Office and the California Invasive Plant Council (Cal-IPC). The weed Control Plan will include measures to minimize impacts to sensitive habitats and species.</p>	<p>Consistent</p>

**APPENDIX K
MULTIPLE SPECIES CONSERVATION PLAN SUBAREA CONSISTENCY**

MSCP Subarea Plan Policy or Guideline	Consistency Discussion	Determination
Priority 2		
<p>1. If funding permits, initiate a baseline survey with regular follow-up monitoring to assess invasion or re-invasion by exotics, and to schedule removal. Utilize trained volunteers to monitor and remove exotic species as part of a neighborhood, community, school, or other organization's activities program (such as Friends of Peñasquitos Preserve has done).</p> <p>If done on a volunteer basis, prepare and provide information on methods and timing of removal to staff and the public if requested. For giant reed removal, the Riverside County multi-jurisdictional management effort and experience should be investigated and relevant techniques used. Similarly, tamarisk removal should use the Nature Conservancy's experience in the Southern California desert regions, while artichoke thistle removal should reference the Nature Conservancy's experience in Irvine. Other relevant knowledge and experience is available from the California Exotic Pest Plant Council and the Friends of Los Peñasquitos Canyon Preserve.</p>	<p>SDG&E would implement a Weed Control Plan under Mitigation Measure Biology-3 to prevent the introduction of invasive non-native species to the MHPA. The Weed Control Plan would be implemented throughout the SDG&E ROW and would include specific weed abatement methods, practices, and treatment timing developed in consultation with the San Diego County Agriculture Commissioner's Office and the California Invasive Plant Council (Cal-IPC).</p>	<p>Consistent</p>
<p>2. Conduct an assessment of the need for cowbird trapping in each area of the MHPA where cattle, horses, or other animals are kept, as recommended by the habitat management technical committee in coordination with the wildlife agencies.</p>	<p>The Proposed Project would not involve any activities that keep cattle, horses, or other animals.</p>	<p>Consistent</p>
<p>3. If eucalyptus trees die or are removed from the MHPA area, replace with appropriate native species. Ensure that eucalyptus trees do not spread into new areas, nor increase substantially in numbers over the years. Eventual replacement by native species is preferred.</p>	<p>It is anticipated that the Proposed Project would remove 5 trees from the Carmel Valley Road median, which is outside of the MHPA. SDG&E would also implement a Weed Control Plan under Mitigation Measure Biology-3 and a Habitat Restoration Plan under Mitigation Measure Biology-6.</p>	<p>Consistent</p>
<p>4. On a case by case basis some limited trapping of non-native predators may be necessary at strategic locations, and where determined feasible to protect ground and shrub-nesting birds, lizards, and other sensitive species from excessive predation. This management directive may be</p>	<p>It is not anticipated that trapping of non-native predators would be necessary to meet the conditions for species coverage for the Proposed Project. Impacts to special-status species would be addressed in the Proposed Project through the implementation of mitigation measures that provide protocols to</p>	<p>Consistent</p>

**APPENDIX K
MULTIPLE SPECIES CONSERVATION PLAN SUBAREA CONSISTENCY**

MSCP Subarea Plan Policy or Guideline	Consistency Discussion	Determination
<p>considered a Priority 1 if necessary to meet the conditions for species coverage. If implemented, the program would only be on a temporary basis and where a significant problem has been identified and therefore needed to maintain balance of wildlife in the MHPA. The program would be operated in a humane manner, providing adequate shade and water, and checking all traps twice daily. A domestic animals release component would be incorporated into the program. Provide signage at access points and noticing of adjacent residents to inform people that trapping occurs, and how to retrieve and contain their pets.</p>	<p>minimize the potential for injury or death and through the implementation of habitat restoration.</p>	
Flood Control		
Priority 1		
<p>1. Perform standard maintenance, such as clearing and dredging of existing flood channels, during the non-breeding or nesting season of sensitive bird or wildlife species utilizing the riparian habitat. For the least Bell's vireo, the non-breeding season generally includes mid-September through mid-March.</p>	<p>The Proposed Project would not involve standard maintenance for flood control.</p>	<p>Consistent</p>
Priority 2		
<p>1. Review existing flood control channels within the MHPA periodically (every five to ten years) to determine the need for their retention and maintenance, and to assess alternatives, such as restoration of natural rivers and floodplains.</p>	<p>This guideline is not applicable because this guideline is outside of the purview of SDG&E.</p>	<p>Not Applicable</p>

APPENDIX K
MULTIPLE SPECIES CONSERVATION PLAN SUBAREA CONSISTENCY

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