

Appendix 80. Consistency with Existing and Draft Regional Conservation Plans

Multiple comments were received from the Wildlife Agencies, County of San Diego, and other groups concerning the consistency of the Sunrise Powerlink Project with various regional habitat conservation plans that have been adopted or are in draft form being reviewed for ultimate adoption. The major concern expressed in these comments is whether or not the approval of the Sunrise Powerlink Project would jeopardize the take authority for covered species granted to the local jurisdictions and ultimately to projects within each of the plan areas. Some of the questions posed include what effect would the project have on the conditions of coverage for individual species, and what effect would the project have on regional preserves and wildlife linkages identified in the regional conservation plans?

The environmental impacts of each route alternative were compared with one another to determine the environmentally superior alternative for each segment (see Section H.2 through H.6 in the EIR/EIS). In order to allow an overall project comparison, various segment alternatives were incorporated to create 4 composite route alternatives between the Imperial Valley Substation and the San Diego load center. These 4 composite segments are described in Section 5 of the Recirculated Draft EIR/Supplemental Draft EIS (RDEIR/SDEIS), and it is these 4 routes (i.e., the Proposed Project, Final Environmentally Superior Northern Route, Final Environmentally Superior Southern Route, and SDG&E's "Enhanced" Northern Route) that are analyzed in this appendix. The following analysis provides information on each of the regional conservation plans that have either been adopted or are in draft form, and provides the reader with some context of how the 4 composite routes relate to designated preserves and plan policies. Impacts and required mitigation for the Connected Actions and Indirect Effects (see Section D.2.19 of the Draft EIR/EIS) would be the same across the 4 composite routes being compared. It should be noted that the Sunrise Powerlink project is not bound to local agency requirements that are used to implement the regional plans (such as the Biological Mitigation Ordinance used by the County of San Diego), but the reader is provided with a comparison of the mitigation typically required by each plan with the mitigation required in the Sunrise Powerlink EIR/EIS.

Figure Ap. 80-1 shows the locations of the 4 composite routes relative to the habitat conservation plan areas. Table Ap. 80-1 provides the acreages of temporary disturbance and permanent impact within the preserve areas for each plan. The plan areas are described in Section D.2.1.2 (pages D.2-17, D.2-18, and D.2-20) of Volume 1 of the Draft EIR/EIS.

Please note that the tower locations on the Appendix 8 figures from the Draft EIR/EIS referred to in this appendix are shown as temporarily impacted. They will, in fact, be permanently impacted, and the acreage impacts reported in this appendix and the rest of the Final EIR/EIS have taken this into account.

**Table Ap. 80-1
Impacts to Habitat Conservation Plan Preserve Areas**

Habitat Conservation Plan Preserve Area	Project Route							
	Proposed Project		Final Environmentally Superior Northern Route		SDG&E's "Enhanced" Northern Route		Final Environmentally Superior Southern Route	
	Temporary Disturbance (Acres)	Permanent Impact (Acres)	Temporary Disturbance (Acres)	Permanent Impact (Acres)	Temporary Disturbance (Acres)	Permanent Impact (Acres)	Temporary Disturbance (Acres)	Permanent Impact (Acres)
City of San Diego MHPA	8.6	13.0	2.7	4.1	8.6	13.0	2.6	4.1
City of San Diego San Vicente Cornerstone Lands	0.0	0.0	0.0	0.0	0.0	0.0	1.8	5.5
City of Poway Cornerstone	0.0	0.6	0.0	0.0	0.0	0.6	0.0	0.0
South San Diego County Hardline Preserve	25.0	6.8	0.0	31.8	45.6	6.8	0.6	3.6
South San Diego County Pre-approved Mitigation Area	25.7	19.7	26.5	26.5	25.7	19.7	33.8	52.7
North San Diego County Draft Preserve (Draft)	0.6	2.0	1.9	2.4	1.9	3.2	0.0	0.0
North San Diego County Pre-approved Mitigation Area (Draft)	2.6	1.4	1.8	4.7	3.5	4.9	0.0	0.0
MCAS Miramar	5.1	5.2	7.2	5.3	7.2	5.3	5.2	5.2

1.0 CITY OF SAN DIEGO MSCP SUBAREA PLAN

This approved subarea plan encompasses 206,124 acres within the MSCP Subregion. The City's "Multi-Habitat Planning Area" (MHPA) is approximately 56,831 acres. Approximately 90 percent (52,012 acres) of the MHPA lands will be preserved for biological purposes. Within the MHPA, limited development may occur, and documented populations of covered species will be protected to the extent feasible (City of San Diego 1997). Additionally, the MHPA includes 10,400 acres of Cornerstone Lands maintained by the City Water Department that are considered essential building blocks for creating a viable habitat preserve system. They have been, and are to be, maintained in an undisturbed condition to serve as watershed for the City's reservoirs. Cornerstone Lands are restricted from being used for purposes inconsistent with habitat preservation (City of San Diego 1997).

According to the subarea plan, utility lines and roads are considered compatible with the biological objectives of the City's MSCP Subarea Plan and are conditionally allowed within the MHPA as

summarily follows.

- All proposed utility lines should be designed to avoid or minimize intrusion into the MHPA. If no other routing is feasible, then the lines should follow existing roads, easements, rights-of-way and disturbed areas.
- All new development for utilities and facilities within or crossing the MHPA shall minimize environmental impacts and must avoid disturbing the habitat of MSCP covered species and wetlands. Mitigation is required if avoidance is infeasible.
- Temporary construction areas and roads, staging areas, or permanent access roads must not disturb existing habitat unless unavoidable; then, restoration and/or mitigation is required.
- Construction and maintenance activities in wildlife corridors must avoid significant disruption of corridor usage.
- Development of roads in canyon bottoms should be avoided whenever feasible. Then, the road must cross the shortest length of the MHPA as possible and should provide for wildlife movement.
- Roads in the MHPA should be narrowed from existing design standards and located in lower quality habitat or disturbed areas to the extent possible.
- Existing roads and utility lines are considered a compatible use within the MHPA.

The following describes how the Proposed Project, the Final Environmentally Superior Northern Route, SDG&E's "Enhanced" Northern Route, and the Final Environmentally Superior Southern Route affect the MHPA and whether or not each is consistent with the biological objectives (i.e., land use considerations) of the City's Subarea Plan.

1.1 PROPOSED PROJECT

The Proposed Project (including the Reconductor Sycamore Canyon to Elliot 69 kV Line discussed separately below) traverses approximately 13.6 miles of the MHPA in the Beeler Canyon Area, Penasquitos Canyon area, and south of MCAS Miramar (Figure Ap. 8O-2). It temporarily disturbs approximately 8.6 acres and permanently impacts approximately 13.0 acres of land in the MHPA (Table Ap. 8O-1). Penasquitos Canyon is a regional corridor linking coastal habitats to inland habitats on Black Mountain and in Poway (City of San Diego 1997). The Beeler Canyon area includes linkages from Penasquitos Canyon Preserve east through Sabre Springs into the Miramar Lake area, MCAS Miramar, and Sycamore Canyon Regional Park (City of San Diego 1997).

Beeler Canyon Area. In the Beeler Canyon area, the Proposed Project is located adjacent to an existing transmission line for approximately 2.2 miles where, based on preliminary engineering, there would be 14 towers and 4 temporary pull sites. Existing access roads would be used in the Beeler Canyon area, although one access road and a number of spur roads off of the existing access roads would be constructed. Vegetation communities along the route in this area include coastal sage-chaparral scrub and disturbed habitat. No special status plant or animal species were observed along this portion of the route. See Appendix 8A Figures Ap. 8A-23 and Ap. 8A-24 of the Draft EIR/EIS for the Proposed Project Biological Resources/Impacts in this area.

Penasquitos Canyon Area. In the Penasquitos Canyon area, approximately 5 miles of the Proposed Project transmission line would be overhead adjacent to an existing transmission line, and approximately 1.5 miles would be underground. For the overhead portion, there would be, based on preliminary engineering, 27 towers, 6 access roads, and 6 temporary pull sites. Existing access roads would be used to a great extent in this area, although the project would involve the construction of spur

roads off of the existing access roads. See Appendix 8A Figures Ap. 8A-24, Ap. 8A-25, Ap. 8A-25A, and Ap. 8A-25B of the Draft EIR/EIS for the Proposed Project Biological Resources/Impacts in this area. These vegetation communities occur along the Proposed Project route in the Penasquitos Canyon area of the MHPA: coastal sage-chaparral scrub, chamise chaparral, developed, non-native grassland, southern mixed chaparral-granitic, coastal sage scrub-inland form, Diegan coastal sage scrub, southern mixed chaparral, southern coast live oak riparian forest, disturbed habitat, disturbed wetland, southern willow scrub, mule fat scrub, coast live oak woodland, southern maritime chaparral, freshwater, and vernal pool.

Seven special status plant species were observed in or along the Proposed Project route study area in the Penasquitos Canyon area of the MHPA: Del Mar manzanita, Del Mar Mesa sand aster, San Diego barrel cactus, summer holly, San Diego sand aster, Nuttall's scrub oak, and California adolphia. Del Mar manzanita, Del Mar Mesa sand aster, and San Diego barrel cactus are covered species under the City's Subarea Plan. These 3 covered species are discussed below. Please see Appendix 8A Figures Ap.8A-24 and Ap. 8A-25 for impacts to summer holly, San Diego sand aster, Nuttall's scrub oak, and California adolphia.

Del Mar Manzanita. Seventy-eight Del Mar manzanita plants were observed near MP 147 of the Proposed Project in the MHPA in the Penasquitos Canyon area. Some of the 78 Del Mar manzanita plants could be impacted by spur road and tower construction (Appendix 8A Figure Ap. 8A-25) based on preliminary engineering.

Del Mar Mesa Sand Aster. Eleven Del Mar Mesa sand aster plants were observed in the MHPA in the Penasquitos Canyon area. One Del Mar Mesa sand aster plant was observed near Tower Co12 (northeast of MP 148 of the Proposed Project) in the MHPA and would be impacted by access road and tower construction (Appendix 8A Figure Ap.8A-25) based on preliminary engineering. Ten other individuals were observed outside the study area (northeast of MP 148 of the Proposed Project) in the MHPA along an existing dirt road; these individuals would not be affected by construction (Appendix 8A Figure Ap.8A-25).

San Diego Barrel Cactus. One-hundred ten San Diego barrel cacti were observed in the MHPA in the Penasquitos Canyon area. Based on preliminary engineering, one barrel cactus would be impacted during construction of the underground portion of the Proposed Project, and 11 barrel cacti would be impacted during tower construction (towers Co8 and Co10) near MP 148 of the Proposed Project (Appendix 8A Figure Ap.8A-25).

Three special status animal species were observed along the Proposed Project in the Penasquitos Canyon area of the MHPA: San Diego fairy shrimp, coastal California gnatcatcher, and northern harrier. Each is a covered species under the City's Subarea Plan, and each is discussed below.

San Diego Fairy Shrimp. San Diego fairy shrimp were observed in water-holding basins (aka road pools) at five locations and in a vernal pool at one location, all along existing dirt roads that may be used to access the Proposed Project that occurs in the Penasquitos Canyon area of the MHPA (Appendix 8A Figure Ap.8A-25A). There were at least 70 water-holding basins mapped in the area that were not surveyed that could support covered fairy shrimp species (Appendix 8A Figures Ap. 8A-25A and Ap. 8A-25B), and in the absence of survey data, covered fairy shrimp are assumed to be potentially present in all of them. Riverside fairy shrimp (a covered species) may also be present.

Coastal California Gnatcatcher. One pair of coastal California gnatcatchers was observed in the MHPA in the Penasquitos Canyon area east of Interstate 15 and south of Poway Road (Appendix 8A Figure Ap.8A-24). The location where the gnatcatcher pair was observed would not be directly impacted by construction, but habitat potentially used by the pair would be impacted, and the pair could

be impacted by indirect noise impacts during construction if it was to occur during the gnatcatcher breeding season. Nine pairs and 1 individual coastal California gnatcatcher were observed between Proposed Project MPs 146 and 149.5 (Appendix 8A Figure Ap.8A-25). Eight of the pairs and the individual would not be

directly impacted by construction but habitat potentially used by the pairs would be impacted, and the pairs could be impacted by indirect noise impacts during construction if it was to occur during the gnatcatcher breeding season. The location where the ninth pair was observed (tower Co5 near MP 149) would be directly impacted by construction of the tower and an access road.

Northern Harrier. One northern harrier was observed west of MP 149 of the Proposed Project in the MHPA in the Penasquitos Canyon area (Appendix 8A Figure Ap.8A-25). The location where this harrier was observed would not be directly impacted by construction.

Reconductor Sycamore Canyon to Elliot 69 kV Line (Reconductor)

The Reconductor portion of the Proposed Project traverses approximately 4.9 miles of the MHPA south of MCAS Miramar and involves reconductoring an existing transmission line with some pole replacement via the use of existing access roads and 6 temporary pull sites—all within the existing ROW. See Appendix 8A Figures Ap. 8A-29 through Ap. 8A-31 of the Draft EIR/EIS for the Proposed Project Biological Resources/Impacts in this area. These vegetation communities occur in the MHPA along the Reconductor: southern mixed chaparral (including –disturbed), coastal sage-chaparral scrub (including –disturbed), non-native grassland, riparian woodland, southern coast live oak riparian forest, mule fat scrub, Diegan coastal sage scrub (including –disturbed), southern willow scrub, vernal pool, disturbed habitat, and developed.

Six special status plant species were observed along the Reconductor in the MHPA: Del Mar Manzanita, San Diego button-celery, San Diego thorn-mint, San Diego barrel cactus, Nuttall’s scrub oak, and summer holly.

Del Mar manzanita, San Diego button-celery, San Diego thorn-mint, and San Diego barrel cactus are covered species under the City’s Subarea Plan; San Diego button-celery and San Diego thorn-mint are also narrow endemic species under the City’s Subarea Plan. The 4 covered species are discussed below. Please see Appendix 8A Figures Ap.8A-29 through Ap. 8A-31 for impacts to Nuttall’s scrub oak and summer holly.

Del Mar Manzanita. Ten Del Mar manzanita plants were observed at MP 5.5 of the Reconductor (Appendix 8A Figure Ap. 8A-30 of the Draft EIR/EIS). Based on preliminary engineering, Del Mar manzanita would not be affected by Reconductor construction.

San Diego Button-Celery. One San Diego button-celery was observed at MP 7.5 of the Reconductor in association with a vernal pool (Appendix 8A, Figure Ap. 8A-31 of the Draft EIR/EIS). Reconductor construction would not impact this plant because the existing dirt access road would be used to access Tower 379523.

San Diego Thorn-Mint. San Diego thorn-mint was observed north of MP 8 of the Reconductor in coastal sage-chaparral scrub adjacent to an existing dirt access road (Appendix 8A Figure Ap. 8A-31 of the Draft EIR/EIS). Approximately 28 individuals were observed at this location. Reconductor construction would not impact these plants since the existing access road would be used.

San Diego Barrel Cactus. Three San Diego barrel cacti were observed at MP 7.5 of the Reconductor. Reconductor construction would not impact these plants because the existing dirt road would be used to access Tower 379523 (Appendix 8A Figure Ap. 8A-31 of the Draft EIR/EIS).

Three special status animal species were observed along the Reconductor in the MHPA: coastal California gnatcatcher, southern California rufous-crowned sparrow, and San Diego black-tailed jackrabbit. The coastal California gnatcatcher and southern California rufous-crowned sparrow are covered species under the City’s Subarea Plan. The 2 covered species are discussed below. Please see Appendix 8A Figure Ap.8A-29 for impacts to the San Diego black-tailed jackrabbit.

Coastal California Gnatcatcher. Two pairs of coastal California gnatcatchers were observed near MP 8 of the Reconductor (Appendix 8A, Figure Ap. 8A-31 of the Draft EIR/EIS). Based on preliminary engineering, there would be no direct impacts to the gnatcatcher since the only ground disturbance near the pairs would be from two pull sites on developed land.

Southern California Rufous-Crowned Sparrow. One southern California rufous-crowned sparrow was observed north of MP 5 outside the study area (Appendix 8A Figure Ap.8A-29 of the Draft EIR/EIS), and one sparrow was observed northeast of MP 7 outside the study area (Appendix 8A Figure Ap.8A-30 of the Draft EIR/EIS). Based on preliminary engineering, the southern California rufous-crowned sparrow would not be directly affected by Reconductor construction because the species was observed outside the study area, and only minor temporary impacts to vegetation from a pull site near MP 5 would occur near one of the observations.

1.1.1 Consistency of the Proposed Project with the City of San Diego MSCP Subarea Plan

Where the Proposed Project occurs in the MHPA, the overhead portions are located adjacent to existing transmission lines consistent with the objectives of the City's Subarea Plan, except where the project would occur underground in Penasquitos Canyon. Existing access roads would be used, although one access road and a number of spur roads to individual towers would be constructed. Temporary pull sites would also be constructed but would be restored to native vegetation. Mitigation is required for the permanent and temporary losses of vegetation as described below, consistent with the City's Subarea Plan. The mitigation for the project was calculated based on an assumption that all impacts will occur in preserve areas (i.e., areas already preserved or targeted for preservation within the various subarea plans) and that all mitigation will also occur in such preserve areas (see Section D.2.5, paragraph above Table D.2-7 of the Draft EIR/EIS).

Based on preliminary engineering, covered species would be affected by the project as described above. However, the project description incorporates Applicant Proposed Measures (APMs; see Table D.2-5 of this Final EIR/EIS) to minimize or prevent potential impacts to sensitive vegetation communities and special status plant and animal species, and where the APMs are not appropriate or not adequate to minimize or prevent potential impacts, mitigation is required (see Appendix 8N of this Final EIR/EIS). The APMs include measures such as, but not limited to:

- Perform any detailed on-the-ground protocol surveys with regard to specific sensitive plant or wildlife species whose habitat would be impacted by the project based on final design (BIO-APM-1; see Appendix 8N).
- Limits of project construction and survey activities would be predetermined based on temporary and permanent disturbance areas noted on final design engineering drawings with activity restricted to and confined within those limits.... During project surveying activities, brush clearing for footpaths, line-of-sight cutting, and land surveying panel point placement in sensitive habitat would require prior approval from the project biological resource monitor (BIO-APM-4; see Appendix 8N).
- Prior to construction, plant population boundaries designated as sensitive would be clearly delineated. Flagged areas would be avoided to the extent practicable during construction activities in that area (BIO-APM-8; see Appendix 8N).
- To the extent feasible structures and access roads would be designed to minimize impacts to sensitive features. These areas of sensitive features include, but are not limited to, high-value wildlife habitats, sensitive vegetation communities, and high value plant habitats, and/or to allow conductors to clearly span the features, within limits of standard structure design. If the sensitive features cannot be completely avoided, structures and access roads would be placed to minimize

the disturbance to the extent feasible (BIO-APM-18; see Appendix 8N).

- ...vegetation shall be left in place wherever possible to avoid excessive root damage and allow for re-sprouting (BIO-APM-20; see Appendix 8N).
- Only the minimum amount of vegetation necessary for the construction of structures and facilities will be removed (BIO-APM-23; see Appendix 8N).

The mitigation that is required for the Sunrise Powerlink Project where the APMs are not appropriate or not adequate to minimize or prevent potential impacts to sensitive vegetation communities and special status plant and animal species includes, but is not limited to:

- Locating project components during final project design in previously disturbed areas or where habitat quality is poor to the extent possible, restoring temporarily impacted areas to pre-construction conditions following construction, and purchasing/dedicating suitable habitat for preservation to off-set permanently impacted areas (see Mitigation Measure B-1a of this Final EIR/EIS for details).
- Conducting rare plant surveys and implementing appropriate avoidance/minimization/mitigation strategies (see Mitigation Measure B-5a of this Final EIR/EIS for details).
- Covering steep-walled trenches or excavations to prevent entrapment of wildlife (see Mitigation Measure B-7a of this Final EIR/EIS for details).
- Conducting coastal California gnatcatcher surveys and implementing appropriate avoidance/minimization/mitigation strategies (see Mitigation Measure B-7l of this Final EIR/EIS for details).
- Implementing appropriate avoidance/minimization/mitigation strategies for vernal pools and fairy shrimp habitat (see Mitigation Measure B-1b of this Final EIR/EIS for details).

See Section D.2.9 (Listed or Sensitive Plant Species) and D.2.11 (Listed or Sensitive Wildlife Species) of this Final EIR/EIS for all mitigation measures for impacts to sensitive vegetation communities and listed or sensitive species. Additional mitigation measures are also required for the operation/maintenance phase of the project (see Mitigation Measures for Impact B-12 in Section D.2.16 of this Final EIR/EIS) to avoid or minimize disturbance to wildlife.

With the project design (in particular, locating transmission lines adjacent to existing transmission lines), APMs, and mitigation measures, the project would not significantly disrupt wildlife use of the Penasquitos Canyon corridor and Beeler Canyon linkages and would not adversely affect conditions of coverage for individual species under the City's Subarea Plan. Therefore, it is consistent with the biological objectives (i.e., land use considerations) of the City's MSCP Subarea Plan.

1.2 FINAL ENVIRONMENTALLY SUPERIOR NORTHERN ROUTE

The Final Environmentally Superior Northern Route traverses the MHPA in the Beeler Canyon area in the same corridor as the Proposed Project. It also includes the Reconductor. These portions of the route temporarily disturb approximately 2.7 acres and permanently impact approximately 4.1 acres of land in the MHPA (Table Ap. 8O-1). The Final Environmentally Superior Northern Route also traverses approximately 2 miles of MHPA immediately north of MCAS Miramar (Figure Ap. 8O-2); however, this segment of the route is the Coastal Link System Upgrades Alternative Revision that involves re-conducting on existing structures with the use of existing access roads, and no vegetation would be disturbed. With the project design (in particular, locating transmission lines adjacent to existing transmission lines), APMs, and mitigation measures, the project would not significantly disrupt wildlife use of the Beeler Canyon linkages and would not adversely affect conditions of coverage for individual

species under the City's Subarea Plan. Therefore, it is consistent with the biological objectives (i.e., land use considerations) of the City's MSCP Subarea Plan.

1.3 SDG&E'S "ENHANCED" NORTHERN ROUTE

SDG&E's "Enhanced" Northern Route is nearly identical to the Proposed Project where it traverses the MHPA (see Figure Ap. 8O-2). It temporarily disturbs a total of approximately 8.6 acres and permanently impacts a total of approximately 13.0 acres of land in the MHPA (Table Ap. 8O-1). With the project design (in particular, locating transmission lines adjacent to existing transmission lines), APMs, and mitigation measures, the project would not significantly disrupt wildlife use of the Penasquitos Canyon corridor and Beeler Canyon linkages and would not adversely affect conditions of coverage for individual species under the City's Subarea Plan. It is further noted that transmission lines are considered compatible with the biological objectives of the City's MSCP Subarea Plan. Therefore, it is consistent with the biological objectives (i.e., land use considerations) of the City's MSCP Subarea Plan.

1.4 FINAL ENVIRONMENTALLY SUPERIOR SOUTHERN ROUTE

The Final Environmentally Superior Southern Route, including the Reconductor, traverses approximately 8.3 miles of MHPA (Figure Ap. 8O-2). It temporarily disturbs approximately 4.4 acres and permanently impacts approximately 9.6 acres of land in the MHPA (these acreage numbers include impacts to San Vicente Cornerstone Lands discussed below; Table Ap. 8O-1). It follows the Proposed Project through the Beeler Canyon area and includes the Reconductor.

A portion of the route (i.e., the Highway 67 Hansen Quarry Reroute; see page 34 of the RDEIR/SDEIS) also traverses the MHPA in San Vicente Cornerstone Lands for approximately 1.4 miles, where, based on preliminary engineering, there would be 7 towers, 1 pull site, and approximately 1.5 miles of access roads. The impacts to the San Vicente Cornerstone Lands portion of the MHPA include approximately 1.8 acres of temporary disturbance and approximately 5.5 acres of permanent impact (Table Ap. 8O-1). Vegetation communities along the reroute in this Cornerstone include (based on aerial photograph interpretation; see Appendix 8R of this Final EIR/EIS) chamise chaparral-burned, Diegan coastal sage scrub-disturbed, Diegan coastal sage scrub-burned, non-native grassland, mule fat scrub, and developed.

No surveys for special status plant species were conducted for the Highway 67 Hansen Quarry Reroute (see Appendix 8R of this Final EIR/EIS). No special status plant species were observed along the portion of the Interstate 8 Alternative that is west of the Highway 67 Hansen Quarry Reroute (see Figures Ap. 8J-17 and Ap. 8J-18 in Appendix 8J of the Draft EIR/EIS and Figure 3-9 on page 36 of the RDEIR/SDEIS).

No focused surveys for special status animal species were conducted for the Highway 67 Hansen Quarry Reroute (see Appendix 8R of this Final EIR/EIS). One special status animal species, the Cooper's hawk, was observed along the Interstate 8 Alternative (near tower S40019; see Figure Ap. 8J-17 in Appendix 8J of the Draft EIR/EIS). This location is within 300 feet of the Highway 67 Hansen Quarry Reroute. The Cooper's hawk is a covered species under the City's Subarea Plan.

The San Vicente Cornerstone Lands are expected to provide an east-west connection between USDA Forest Service lands to the east and MCAS Miramar to the west (City of San Diego 1997). The Final Environmentally Superior Southern Route crosses in a northwest-southeast direction across the western edge of this Cornerstone. The Hansen aggregate mineral resources quarry and Highway 67 just to the west (see Figure Ap. 8O-2 and Figure 3-9 on page 36 of the RDEIR/SDEIS) act as existing barriers to this east-west connection. Although this portion of the Final Environmentally Superior Southern Route does create impacts to Cornerstone Lands, the impacts would be minimized or prevented with APMs,

or where the APMs are not appropriate or not adequate to minimize or prevent potential impacts, mitigation is required (see Appendix 8N of this Final EIR/EIS) as described in Section 1.1.1. Due to the intermittent locations of construction activity and its temporary nature, wildlife would not be physically prevented from moving around project equipment in the transmission corridor. During project operation, the widely spaced towers would not physically obstruct wildlife movement, nor would the presence of access roads, so the project would not adversely affect wildlife movement in the Cornerstone. The project also includes mitigation measures that would protect the watershed from erosion, and therefore, the water resources of San Vicente Reservoir, consistent with the City's Subarea Plan. These measures include:

- Limit modification of access roads (Mitigation Measure G-1a; see Section D.13 of this Final EIR/EIS).
- Implement erosion control procedures (Mitigation Measure G-1b; see Section D.13 of this Final EIR/EIS).
- Avoid new disturbance, erosion, and degradation (Mitigation Measure G-1c; see Section D.13 of this Final EIR/EIS).
- Restore surfaces for erosion control and revegetation (Mitigation Measure G-1d; see Section D.13 of this Final EIR/EIS).

Therefore, the Final Environmentally Superior Southern Route is consistent with the biological objectives (i.e., land use considerations) of the City's MSCP Subarea Plan.

2.0 CITY OF POWAY MSCP SUBAREA PLAN

In July 1996, the City of Poway finalized its Multi-Species HCP/NCCP Subarea Plan (Ogden 1996), which provides incidental take coverage for 43 species of plants and animals. The City of Poway encompasses 25,000 acres, and the plan establishes a 13,300 acre Mitigation Area where habitat conservation will be emphasized. A minimum of 78% of habitat within this Mitigation Area will be conserved.

According to the Subarea Plan, limited utility projects may be necessary within cornerstones (i.e., lands subject to 95 to 100 percent preservation), subject to guidelines and restrictions of the subarea plan. In order for utility projects to be considered conditionally compatible in cornerstones, they must meet the biological goals and objectives of the Poway subarea plan. Specifically, they should 1) incur minimal impacts; 2) be sited to avoid sensitive biological resources; 3) mitigate any impacts through a combination of on-site mitigation and off-site compensation/mitigation within Proposed Resource Protection Areas; and 4) fall within the 5 percent total allowable cornerstone acreage impact guidelines. Removal of 5 percent of the natural vegetation on any cornerstone may be acceptable only if off-site compensation and mitigation are sufficient to provide a net benefit to the overall biological preserve system (Ogden 1996).

The following describes how the Proposed Project, the Final Environmentally Superior Northern Route, SDG&E's "Enhanced" Northern Route, and the Final Environmentally Superior Southern Route affect the City's preserve (in this case, the South Poway Cornerstone) and whether or not each meets the biological goals and objectives of the Poway Subarea Plan.

2.1 PROPOSED PROJECT

The Proposed Project traverses approximately 0.36 mile of South Poway Cornerstone located adjacent to an existing transmission line. Within this cornerstone, it is estimated that the Proposed Project would permanently impact approximately 0.6 acre of land (Table Ap. 8O-1) from 1 tower. The vegetation

communities in this portion of the South Poway Cornerstone include chamise chaparral and developed, and no special status plant or animal species were observed along the route in the cornerstone.

The Proposed Project is consistent with the biological goals and objectives of the Poway Subarea Plan because it incurs minimal impacts, is sited within an existing transmission line ROW, and with the project's APMs and mitigation measures (described in Section 1.1.1) would avoid, minimize or mitigate potential effects on sensitive vegetation communities and special status plant or animal species (including covered species) that may be present.

2.2 FINAL ENVIRONMENTALLY SUPERIOR NORTHERN ROUTE

The Environmentally Superior Northern Route does not traverse the City of Poway.

2.3 SDG&E'S "ENHANCED" NORTHERN ROUTE

SDG&E's "Enhanced" Northern Route is identical to the Proposed Project where it traverses the City of Poway (i.e., the South Poway Cornerstone; Table Ap. 80-1). Therefore, for the same reasons as the Proposed Project, SDG&E's "Enhanced" Northern Route is consistent with the biological goals and objectives of the Poway Subarea Plan.

2.4 FINAL ENVIRONMENTALLY SUPERIOR SOUTHERN ROUTE

The Environmentally Superior Southern Route does not traverse the City of Poway.

3.0 COUNTY OF SAN DIEGO MSCP SUBAREA PLAN SOUTH

The southwestern coastal portion of the County subarea encompasses 252,132 acres (184,248 acres is habitat), of which 101,268 acres will be conserved. The County of San Diego Subarea Plan was adopted in October 1997 (County of San Diego 1997). One of the guiding principles of the Subarea Plan is to provide for the development of future infrastructure across and adjacent to preserve lands (page 1-2 in County of San Diego 1997). Land uses allowed within the preserve include necessary infrastructure (page 1-21 in County of San Diego 1997).

The County's Subarea Plan provides take authorization for projects where the County is the Lead Agency and where the project is consistent with the Subarea Plan and all accompanying ordinances. According to the County's Subarea Plan, take for infrastructure projects within hardline preserve areas would be authorized through the major or minor amendment process to the take authorizations as appropriate (Section 1.9.3 on page 1-22 in County of San Diego 1997). However, Section 10.13 of the County of San Diego MSCP Implementing Agreement by and between the U.S. Fish and Wildlife Service, California Department of Fish and Game, and County of San Diego (1998) states that, "...location of infrastructure may be identified which make[s] it infeasible for the project to meet all goals, criteria, or other requirements in the Subarea Plan, but the project could be constructed without compromising conservation of species and habitats pursuant to the Subarea Plan....County may approve an exception to the Subarea Plan for the project with the concurrence of the Wildlife Agencies." The Sunrise Powerlink Project does not require County discretionary approvals, and is achieving its take for listed species through consultation with the USFWS and CDFG, separate from the County's Subarea Plan.

Take of covered species resulting from the construction and operation of public infrastructure facilities outside of hardline preserve areas (in pre-approved mitigation area [PAMA]) is permitted based on the County making the following findings, or a project must be consistent with the Biological Mitigation Ordinance (Section 1.9.3.1 on page 1-23 in County of San Diego 1997).

- The project is consistent with adopted community or subregional plans, and the MSCP and subarea plans.

- All feasible mitigation measures have been incorporated, and there are no feasible, less environmentally damaging locations, or alignments.
- Where the project encroaches into a wetland or floodplain, mitigation measures have been incorporated into the project and result in a net gain in wetland and/or riparian habitat.
- Where the project encroaches into steep slopes, native vegetation will be used to revegetate cut and fill areas.
- No mature riparian woodland will be destroyed or reduced in size due to otherwise allowed encroachments.
- All critical populations of sensitive plant species within the County's subarea (Attachment C of Biological Mitigation Ordinance), rare narrow endemic animals species within the County's subarea (Attachment D of Biological Mitigation Ordinance), narrow endemic plant species within the County's subarea (Attachment E of Biological Mitigation Ordinance), and San Diego County sensitive plant species (as defined in the Biological Mitigation Ordinance) will be avoided as required and consistent with the subarea plan and Biological Mitigation Ordinance.

The biological goals and objectives of the Subarea Plan are:

- Acknowledge the no-net-loss wetlands standard to satisfy state and federal wetland goals, policies, and standards.
- Include measures to maximize the habitat structural diversity of conserved habitat areas, including conservation of unique habitats and habitat features.
- Provide for the conservation of spatially representative (e.g., coastal versus interior) examples of extensive patches of coastal sage scrub and other habitat types that were ranked as having high and very high biological value.
- Create significant blocks of habitat to reduce edge effects and maximize the ratio of surface area to the perimeter of conserved habitats.
- Provide incentives for development in the least sensitive habitat areas.
- Provide for the conservation of key regional populations of covered species and representation of sensitive habitats and their geographic sub-associations in biologically functioning units.
- Conserve large interconnected blocks of habitat that contribute to the preservation of wide-ranging species with special emphasis on adequate foraging habitat near golden eagle nesting units.

The following describes how the Proposed Project, the Final Environmentally Superior Northern Route, SDG&E's "Enhanced" Northern Route, and the Final Environmentally Superior Southern Route affect the County's hardline preserve and PAMA and whether or not each meets the biological goals and objectives of the County's MSCP Subarea Plan South.

3.1 PROPOSED PROJECT

The Proposed Project traverses approximately 2 miles of hardline preserve known as Barnett Ranch Open Space (Figure Ap. 80-3); the western approximate 0.3 mile through this preserve is located adjacent to an existing 69 kV transmission line. The Proposed Project would temporarily disturb approximately 25.0 acres (from a staging area) and would permanently impact approximately 6.8 acres of this hardline preserve (Table Ap. 80-1). Based on preliminary engineering, the Proposed Project would include 4 towers, 1 staging area, 2 access roads, and 4 pull sites in Barnett Ranch Open Space.

The Proposed Project also traverses approximately 6.5 miles of PAMA (Figure Ap. 8O-3) and would temporarily disturb approximately 25.7 acres and permanently impact approximately 19.7 acres of PAMA. Based on preliminary engineering, there would be 39 towers, 2 staging areas, multiple access roads, and 10 pull sites in PAMA. The portion of the Proposed Project west of Highway 67 in PAMA would occur within an existing transmission line ROW.

These vegetation communities occur along the Proposed Project route in hardline preserve and PAMA: non-native grassland, southern mixed chaparral-granitic, southern mixed chaparral, chamise chaparral, coastal sage scrub inland form, southern coast live oak riparian forest, coast live oak woodland, orchards and vineyards, and developed. See Appendix 8A Figures Ap. 8A-21 through Ap. 8A-23 of the Draft EIR/EIS for the Proposed Project Biological Resources/Impacts in the hardline preserve and PAMA areas of the Proposed Project. No special status plant or animal species were observed along the Proposed Project route in hardline preserve or PAMA.

Mitigation for unavoidable impacts to sensitive vegetation communities was calculated for the Sunrise Powerlink Project assuming that all project impacts would occur within a preserve area and that all mitigation would occur in a preserve area as well (or land to be added to preserve area; see Section D.2.5, paragraph above Table D.2-7 of the Draft EIR/EIS), so the mitigation ratio for impacts to sensitive vegetation communities in preserve lands is at a minimum of 2:1, which helps assure adequate compensation for preserve impacts. Impacts to covered species would be avoided, minimized, or mitigated (as described in Section 1.1.1), so the County's take authorization for covered species would not be jeopardized. Additionally, due to the intermittent locations of construction activity and its temporary nature, wildlife would not be physically prevented from moving around project equipment in the transmission corridor. During project operation, the widely spaced towers would not physically obstruct wildlife movement, nor would the presence of access roads, so the project would not significantly affect wildlife movement in the hardline preserve or PAMA. The project, as designed, and with the APMs and mitigation measures (described in Section 1.1.1) would meet the findings listed in Section 3.0 consistent with the biological goals and objectives of the County's MSCP Subarea Plan South.

3.2 FINAL ENVIRONMENTALLY SUPERIOR NORTHERN ROUTE

The Final Environmentally Superior Northern Route is the same as the Proposed Project except that it avoids permanent impacts to hardline preserve (Barnett Ranch Open Space) by incorporating the Chuck Wagon Road Alternative (Figure Ap. 8O-3; Appendix 8G Figure Ap. 8G-4 of the Draft EIR/EIS) but would still temporarily disturb approximately 31.8 acres of hardline preserve from construction of a temporary fly yard (Table Ap. 8O-1; see Appendix 11 Figure Ap. 11C-28 of this FEIR/EIS). This fly yard would be constructed in non-native grassland by compacting the vegetation (the use of construction mats is also an option); the site would not be bladed or graded, and no vegetation would be removed.

The Chuck Wagon Road Alternative traverses approximately 3 miles of PAMA; the first approximately 1.75 miles would be underground in Chuck Wagon Road. This alternative includes, based on preliminary engineering, 7 towers, 1 staging area, and 1 access road in PAMA.

The total temporary disturbance to PAMA from the Final Environmentally Superior Northern Route is approximately 26.5 acres. The total permanent impact to PAMA from the Final Environmentally Superior Northern Route is approximately 26.5 acres.

These types of vegetation communities occur along the Chuck Wagon Road Alternative: non-native grassland, sage scrub, chaparral, oak woodland, and oak riparian forest (Appendix 8G Figure Ap. 8G-4 of the Draft EIR/EIS). The overhead portion of the alternative would occur primarily in chaparral.

No special status plant species were observed along the Chuck Wagon Road Alternative in PAMA,

although a survey was not conducted along the overhead portion of the Chuck Wagon Road Alternative because it was private property and no access was permitted.

Six special status animal species were observed within the study area for the portion of the alternative in PAMA that would be underground in Chuck Wagon Road (again, no access was permitted to survey the overhead portion of Chuck Wagon Road Alternative). No direct impacts would occur to these species as the project would be constructed within the existing roadway. The six species include: coast horned lizard (covered species, Group 2 animal species), southern California rufous-crowned sparrow (covered species, Group 1 animal species), yellow warbler (Group 2 animal species), yellow-breasted chat (Group 1 animal species), and San Diego black-tailed jackrabbit (Group 2 animal species). Three other species were assumed to be present based on a lack of survey data but presence of potential habitat: arroyo toad (covered species, Group 1 animal species), least Bell's vireo (covered species; Group 1 animal species), and southwestern willow flycatcher (covered species; Group 1 animal species) (Appendix 8G Figure Ap. 8G-4 of the Draft EIR/EIS).

Mitigation for unavoidable impacts to sensitive vegetation communities was calculated for the Sunrise Powerlink Project assuming that all project impacts would occur within a preserve area and that all mitigation would occur in a preserve area as well (or land to be added to preserve area; see Section D.2.5, paragraph above Table D.2-7 of the Draft EIR/EIS), so the mitigation ratio for impacts to sensitive vegetation communities in preserve lands is at a minimum of 2:1, which helps assure adequate compensation for preserve impacts. Impacts to covered species would be avoided, minimized, or mitigated (as described in Section 1.1.1), so the County's take authorization for covered species would not be jeopardized. Additionally, due to the intermittent locations of construction activity and its temporary nature, wildlife would not be physically prevented from moving around project equipment in the transmission corridor. During project operation, the widely spaced towers would not physically obstruct wildlife movement, nor would the presence of access roads, so the project would not significantly affect wildlife movement in PAMA. The project, as designed, and with the APMs and mitigation measures (described in Section 1.1.1) would meet the findings listed in Section 3.0 consistent with the biological goals and objectives of the County's MSCP Subarea Plan South.

3.3 SDG&E'S "ENHANCED" NORTHERN ROUTE

SDG&E's "Enhanced" Northern Route follows the Proposed Project where it traverses hardline preserve and PAMA (Figure Ap. 8O-3). Its impacts to PAMA are the same as the Proposed Project (Table Ap. 8O-1). Its impacts to hardline preserve are the same as the Proposed Project for permanent impacts, but this route would temporarily disturb approximately 45.6 acres of hardline preserve because it includes a staging area and a fly yard (the Proposed Project would temporarily disturb approximately 25.0 acres from a staging area only; Table Ap. 8O-1).

Mitigation for unavoidable impacts to sensitive vegetation communities was calculated for the Sunrise Powerlink Project assuming that all project impacts would occur within a preserve area and that all mitigation would occur in a preserve area as well (or land to be added to preserve area; see Section D.2.5, paragraph above Table D.2-7 of the Draft EIR/EIS), so the mitigation ratio for impacts to sensitive vegetation communities in preserve lands is at a minimum of 2:1, which helps assure adequate compensation for preserve impacts. Impacts to covered species would be avoided, minimized, or mitigated (as described in Section 1.1.1), so the County's take authorization for covered species would not be jeopardized. Additionally, due to the intermittent locations of construction activity and its temporary nature, wildlife would not be physically prevented from moving around project equipment in the transmission corridor. During project operation, the widely spaced towers would not physically obstruct wildlife movement, nor would the presence of access roads, so the project would not significantly affect wildlife movement in the hardline preserve or PAMA. The project, as designed, and

with the APMs and mitigation measures (described in Section 1.1.1) would meet the findings listed in Section 3.0 consistent with the biological goals and objectives of the County's MSCP Subarea Plan South.

3.4 FINAL ENVIRONMENTALLY SUPERIOR SOUTHERN ROUTE

The Final Environmentally Superior Southern Route traverses approximately 0.7 mile of hardline preserve and would temporarily disturb approximately 0.6 acre and permanently impact approximately 3.6 acres of hardline preserve (Table Ap. 8O-1; Figure Ap. 8O-3) from the High Meadows Reroute (Figure 3-8 on page 35 of the RDEIR/SDEIS).

The Final Environmentally Superior Southern Route also traverses approximately 10.3 miles of PAMA and would temporarily disturb approximately 33.8 acres and permanently impact approximately 52.7 acres of PAMA (Table Ap. 8O-1; Figure Ap. 8O-3). It follows the Proposed Project west of Highway 67 through PAMA, and PAMA is also traversed by the Highway 67 Hansen Quarry Reroute (Figure 3-9 on page 36 of the RDEIR/SDEIS), the High Meadows Reroute, the Interstate 8 Alternative (Appendix 8J Figures Ap. 8J-16 and Ap. 8J-17 in the Draft EIR/EIS), and the Interstate 8 Alternative Chocolate Canyon Option (see Appendix 11 Figure Ap. 11C-54 of this FEIR/EIS).

Vegetation communities along the Proposed Project portion of the portion of the Final Environmentally Superior Southern Route include coastal sage-chaparral scrub and developed. No special status plant or animal species were observed in this area. Based on preliminary engineering, these project features would occur in PAMA along the Proposed Project portion of the route: 7 towers, 2 pull sites, and multiple access roads.

Vegetation communities along the Highway 67 Hansen Quarry Reroute based on aerial photograph interpretation (see Appendix 8R of this Final EIR/EIS) include southern mixed chaparral-burned, Diegan coastal sage scrub-burned, valley needlegrass grassland-disturbed, and developed. No special status plant or animal surveys were conducted for the reroute, but a white-tailed kite (Group 1 animal species) was observed along Highway 67 (during surveys for the Interstate 8 Alternative) approximately 300 feet east of the reroute (Appendix 8J Figure Ap. 8J-18 of the Draft EIR/EIS). The Highway 67 Hansen Quarry Reroute would, based on preliminary engineering, include these project features in PAMA: 7 towers, 1 pull site, and multiple access roads.

Vegetation communities along the High Meadows Reroute portion of the Final Environmentally Superior Southern Route based on aerial photograph interpretation (see Appendix 8R of this Final EIR/EIS) include Diegan coastal sage scrub-burned and southern mixed chaparral-burned. No special status plant or animal surveys were conducted for the reroute, and none were observed along the Interstate 8 Alternative that occurs to the west (Figure 3-8 on page 35 of the RDEIR/SDEIS; Appendix 8J Figure Ap. 8J-17 of the Draft EIR/EIS). The High Meadows Reroute would, based on preliminary engineering, include these project features in hardline preserve: 3 towers, 1 pull site, and multiple access roads. The High Meadows Reroute would, based on preliminary engineering, include these project features in PAMA: 8 towers, 2 pull sites, and multiple access roads.

Types of vegetation communities that occur along the Interstate 8 Alternative portion of the Final Environmentally Superior Southern Route (Appendix 8J Figures Ap. 8J-16 and Ap. 8J-17 of the Draft EIR/EIS) include southern mixed chaparral, coast live oak woodland, riparian woodland, Diegan coastal sage scrub, southern coast live oak riparian forest, non-native grassland, intensive agriculture, and developed. No special status plant species were observed along this portion of the alternative. Three observed special status animal species include coast horned lizard (covered species; Group 2 animal species), southern California rufous-crowned sparrow (covered species; Group 1 animal species), and golden eagle (covered species; Group 1 animal species). The coastal California

gnatcatcher (covered species; Group 1 animal species) was assumed to be present because the alternative traverses its critical habitat. The locations where the horned lizard, sparrow, and eagle were observed would not be directly impacted by the project. The gnatcatcher is assumed to be present at a temporary pull site; if it is present, it would be directly impacted by construction. The Interstate 8 Alternative portion of the Final Environmentally Superior Southern Route would, based on preliminary engineering, include these project features in PAMA: 19 towers, 8 pull sites, 1 staging area, and multiple access roads.

Types of vegetation communities that occur along the Interstate 8 Alternative Chocolate Canyon Option based on aerial photograph interpretation (see Appendix 8R of this Final EIR/EIS) include southern mixed chaparral, non-native grassland, coastal sage-chaparral scrub, coast live oak woodland, and developed. No special status plant or animal surveys were conducted for this option, but three special status animal species were observed along the Interstate 8 Alternative to the west: Cooper's hawk (covered species; Group 1 animal species), yellow-breasted chat (Group 1 animal species), and yellow warbler (Group 2 animal species). Additionally, the coastal California gnatcatcher is assumed to be present along the Interstate 8 Alternative to the west of the Chocolate Canyon Option (Appendix 8J Figure Ap. 8J-16 of the Draft EIR/EIS). The Interstate 8 Alternative Chocolate Canyon Option portion of the Final Environmentally Superior Southern Route would, based on preliminary engineering, include these project features in PAMA: 13 towers, 2 pull sites, and multiple access roads.

Mitigation for unavoidable impacts to sensitive vegetation communities was calculated for the Sunrise Powerlink Project assuming that all project impacts would occur within a preserve area and that all mitigation would occur in a preserve area as well (or land to be added to preserve area; see Section D.2.5, paragraph above Table D.2-7 of the Draft EIR/EIS), so the mitigation ratio for impacts to sensitive vegetation communities in preserve lands is at a minimum of 2:1, which helps assure adequate compensation for preserve impacts. Impacts to covered species would be avoided, minimized, or mitigated (as described in Section 1.1.1), so the County's take authorization for covered species would not be jeopardized. Additionally, due to the intermittent locations of construction activity and its temporary nature, wildlife would not be physically prevented from moving around project equipment in the transmission corridor. During project operation, the widely spaced towers would not physically obstruct wildlife movement, nor would the presence of access roads, so the project would not significantly affect wildlife movement in the hardline preserve or PAMA. The project, as designed, and with the APMs and mitigation measures (described in Section 1.1.1) would meet the findings listed in Section 3.0 consistent with the biological goals and objectives of the County's MSCP Subarea Plan South.

4.0 NORTH SAN DIEGO COUNTY MSCP SUBAREA PLAN (DRAFT)

The wildlife agencies have completed review and comments on the February 2008 administrative draft of this plan. The public review draft will not be available until fall 2008, although a draft preserve plan map is currently available and was used for this discussion (Figure Ap. 8O-4). As of June 2008, the California Department of Fish and Game is considering the entry into a joint Planning Agreement for both the North and East County subarea plans under the NCCP Act with the County of San Diego and the U.S. Fish and Wildlife Service. The Notice of Public Availability and the Proposed Planning Agreement are available for public review. The total study area for the Plan encompasses 311,890 acres in and around the unincorporated communities of Bonsall, De Luz, Fallbrook, Harmony Grove, Rancho Santa Fe, Lilac, Pala, Pauma Valley, Rainbow, Ramona, Rincon Springs, Twin Oaks Valley, and Valley Center. This study area has been further distilled into a Planning Area which excludes tribal lands, Forest Service lands, and most water district lands. Of the 280,459-acre Planning Area where the conservation measures will apply, approximately 17 percent is urbanized and 28 percent is in

agriculture (excluding grazing lands). The remaining 55 percent of the Planning Area consists of natural lands.

Most of the inland areas are made up of chaparral or oak woodland vegetation. Coastal areas contain more sensitive habitats such as coastal sage scrub and southern maritime chaparral. There are several large river systems running east-west that contain extensive riparian woodlands and forests, such as the San Luis Rey River, Santa Margarita River, and Escondido Creek. The Draft Subarea Plan has identified Planning Units that include biological core and linkage areas as well as the preserve lands and PAMA shown on Figure Ap. 8O-4. The subarea plan intends to cover 63 species.

The biological goals of the North County Subarea Plan are to develop a preserve system that will maintain the range of natural biological communities and native species within the North County MSCP Planning Area and contribute to the recovery of endangered, threatened, and sensitive species and their habitats (County of San Diego and Technology Associates International Corporation 2008).

According to the Preliminary Draft North County Biological Mitigation Ordinance (BMO), except as exempted by the BMO, no project requiring a discretionary permit shall be approved unless findings are made that the project is consistent with the North County MSCP Subarea Plan and the BMO and will not interfere with the assembly of the North County MSCP preserve system. None of the exemptions would apply to the Sunrise Powerlink project; however, the Sunrise Powerlink project is not bound to local agency requirements that are used to implement the regional plans (such as the BMO).

The following describes how the Proposed Project, the Final Environmentally Superior Northern Route, SDG&E's "Enhanced" Northern Route, and the Final Environmentally Superior Southern Route relate to the North County Subarea Plan policies to conserve and protect sensitive biological resources through avoidance, minimization, and mitigation as follows.

- Avoid impacts by not taking a proposed action or modifying the location or characteristics of the action.
- Minimize impacts by limiting the degree or magnitude of an action.
- Rectify the impact by repairing, rehabilitating, or restoring the impacted environment.
- Reduce or eliminate impacts over time by preservation and maintenance during the life of an action.
- Compensate for impacts by replacing or providing substitute resources or environments.

4.1 PROPOSED PROJECT

The Proposed Project traverses approximately 5.2 miles of draft PAMA (Figure Ap. 8O-4), but the project would be underground in paved roadway most of the distance. The Proposed Project would temporarily disturb approximately 2.6 acres and would permanently impact approximately 1.4 acres of draft PAMA (Table Ap. 8O-1). Based on preliminary engineering, there would be 3 towers and 1 access road in draft PAMA.

The Proposed Project also traverses approximately 1.7 miles of draft preserve, primarily Mount Gower Open Space, adjacent to an existing transmission line (Figure Ap. 8O-4). It is acknowledged that Mount Gower Open Space is already an established preserve, but since the Subarea Plan has not been adopted, all preserve areas within the plan area are mapped as draft preserve on Figure Ap.8O-4. The Proposed Project would temporarily disturb approximately 0.6 acre and would permanently impact approximately

2.0 acres of draft preserve (Table Ap. 8O-1). Based on preliminary engineering, there would be 9 towers, 2 pull sites, 1 staging area, and access roads in draft preserve.

These vegetation communities occur along the Proposed Project route in draft preserve and draft PAMA (Appendix 8A Figures Ap. 8A-20 and Ap. 8A-21 of the Draft EIR/EIS): developed, disturbed habitat, coastal sage-chaparral scrub, coastal sage scrub inland form, and coast live oak woodland.

One special status plant species, Ramona horkelia (not a covered species), was observed in Mount Gower Open Space Appendix 8A Figure Ap. 8A-20 of the Draft EIR/EIS). Seventy-five Ramona horkelia plants were observed near tower I95 and an access road. It is possible that some of these plants could be impacted by construction. Three special status animal species were observed in draft preserve or draft PAMA: Cooper's hawk (not a covered species), western spadefoot toad (covered species), and San Diego black-tailed jackrabbit (covered species; Appendix 8A Figures Ap. 8A-20 and Ap. 8A-21 of the Draft EIR/EIS). The only location where a special status animal species was observed that would be directly impacted by construction is the location of the jackrabbit.

The Proposed Project traverses the Eastern Ramona Core that connects Cleveland National Forest (CNF) near Lake Sutherland to the north with CNF and El Capitan to the south, which connects with a core preserved area around San Vicente Reservoir. Another important area in the Eastern Ramona Core is from Simon Preserve to Barnett Ranch (in the South County MSCP Subarea), which ultimately links to the area around San Vicente Reservoir (County of San Diego and Technology Associates International Corporation 2008). However, the Proposed Project would be underground in paved roadway most of the way through PAMA in the core and would be located adjacent to an existing transmission line in Mount Gower Open Space and PAMA in the core, so it would not have significant effects on wildlife movement in the core.

Furthermore, because so much of the Proposed Project is underground in existing paved roadway and within an existing transmission corridor, the impacts to sensitive vegetation communities are relatively minor. Mitigation for unavoidable impacts to sensitive vegetation communities was calculated for the Sunrise Powerlink Project assuming that all project impacts would occur within a preserve area and that all mitigation would occur in a preserve area as well (or land to be added to preserve area; see Section D.2.5, paragraph above Table D.2-7 of the Draft EIR/EIS), so the mitigation ratio for impacts to sensitive vegetation communities in preserve lands is at a minimum of 2:1, which helps assure adequate compensation for preserve impacts. Impacts to covered species would be avoided, minimized, or mitigated (as described in Section 1.1.1) consistent with the North County MSCP Subarea Plan listed in Section 4.0, so the County's potential take authorization for covered species would not be jeopardized.

4.2 FINAL ENVIRONMENTALLY SUPERIOR NORTHERN ROUTE

The Final Environmentally Superior Northern Route traverses approximately 4.4 miles of draft PAMA (Figure Ap. 8O-4). It would temporarily disturb approximately 1.8 acres and would permanently impact approximately 4.7 acres of draft PAMA (Table Ap. 8O-1).

The Final Environmentally Superior Northern Route would also traverse approximately 1.8 miles of draft preserve, primarily Mount Gower Open Space, and would temporarily disturb approximately 1.9 acres and would permanently impact approximately 2.4 acres of draft preserve (Table Ap. 8O-1), primarily in Mount Gower Open Space.

The Final Environmentally Superior Northern Route follows the same route as the Proposed Project through the North County MSCP area, except that it incorporates the Oak Hollow Road Underground Alternative (Appendix 8G Figure Ap. 8G-2 of the Draft EIR/EIS) in draft PAMA with a small area in draft preserve, which, based on preliminary engineering, includes disturbance to underground the line in an existing dirt road, 3 towers, 2 pull sites, 1 staging area, and some access roads.

These vegetation communities were observed along the Oak Hollow Road Underground Alternative: southern coast live oak riparian forest, southern mixed chaparral (including –burned and –disturbed), Diegan coastal sage scrub-burned, southern cottonwood-willow riparian forest, mule fat scrub-disturbed, intensive agriculture, disturbed habitat, and developed. No special status plant species were observed along the Oak Hollow Road Underground Alternative. One special status animal species, western spadefoot toad (covered species), was observed (Appendix 8G Figure Ap. 8G-2 of the Draft EIR/EIS). Both locations where the toad was observed would be directly impacted by construction.

The Final Environmentally Superior Northern Route traverses the Eastern Ramona Core. However, the Final Environmentally Superior Northern Route is designed to be underground in paved roadway most of the way through PAMA and underground in Oak Hollow Road in the core and also to be located adjacent to an existing transmission line in Mount Gower Open Space and PAMA in the core, so it would not have significant effects on wildlife movement in the core.

Furthermore, because so much of the Proposed Project is underground and within roads in existing transmission corridor, the impacts to sensitive vegetation communities are relatively minor. Mitigation for unavoidable impacts to sensitive vegetation communities was calculated for the Sunrise Powerlink Project assuming that all project impacts would occur within a preserve area and that all mitigation would occur in a preserve area as well (or land to be added to preserve area; see Section D.2.5, paragraph above Table D.2-7 of the Draft EIR/EIS), so the mitigation ratio for impacts to sensitive vegetation communities in preserve lands is at a minimum of 2:1, which helps assure adequate compensation for preserve impacts. Impacts to covered species would be avoided, minimized, or mitigated (as described in Section 1.1.1) consistent with the North County MSCP Subarea Plan listed in Section 4.0, so the County’s potential take authorization for covered species would not be jeopardized.

4.3 SDG&E’S “ENHANCED” NORTHERN ROUTE

SDG&E’s “Enhanced” Northern Route traverses approximately 1.8 miles of draft preserve, primarily Mount Gower Open Space, and approximately 5.8 miles of draft PAMA (Figure Ap. 8O-4). SDG&E’s “Enhanced” Northern Route would temporarily disturb approximately 1.9 acres and would permanently impact approximately 3.2 acres of draft preserve (Table Ap. 8O-1). It would also temporarily disturb approximately 3.5 acres and would permanently impact approximately 4.9 acres of draft PAMA (Table Ap. 8O-1). Like the Final Environmentally Superior Northern Route, it also incorporates the Oak Hollow Road Underground Alternative. Based on preliminary engineering, this route would include disturbance to underground the line in an existing dirt road, 9 towers, 3 pull sites, 1 staging area, and multiple access roads.

Since SDG&E’s “Enhanced” Northern Route follows the Proposed Project route, the same vegetation communities and special status plant and animal species would occur along this route in draft preserve and draft PAMA. Additionally, the same vegetation communities and animal species observed along the Oak Hollow Road Underground Alternative (discussed for the Final Environmentally Superior Northern Route) occur in draft PAMA.

SDG&E’s “Enhanced” Northern Route traverses the Eastern Ramona Core. However, SDG&E’s “Enhanced” Northern Route is designed to be underground in paved roadway most of the way through PAMA and underground in Oak Hollow Road in the core and also to be located adjacent to an existing transmission line in Mount Gower Open Space and PAMA in the core, so it would not have significant effects on wildlife movement in the core.

Furthermore, because so much of the Proposed Project is underground and within roads in existing transmission corridor, the impacts to sensitive vegetation communities are relatively minor. Mitigation for unavoidable impacts to sensitive vegetation communities was calculated for the Sunrise Powerlink

Project assuming that all project impacts would occur within a preserve area and that all mitigation would occur in a preserve area as well (or land to be added to preserve area; see Section D.2.5, paragraph above Table D.2-7 of the Draft EIR/EIS), so the mitigation ratio for impacts to sensitive vegetation communities in preserve lands is at a minimum of 2:1, which helps assure adequate compensation for preserve impacts. Impacts to covered species would be avoided, minimized, or mitigated (as described in Section 1.1.1) consistent with the North County MSCP Subarea Plan listed in Section 4.0, so the County's potential take authorization for covered species would not be jeopardized.

4.4 FINAL ENVIRONMENTALLY SUPERIOR SOUTHERN ROUTE

The Final Environmentally Superior Southern Route does not occur in the North County MSCP Subarea.

5.0 EAST SAN DIEGO COUNTY MSCP SUBAREA PLAN (DRAFT)

The County of San Diego is embarking on a program to prepare an HCP/NCCP for its unincorporated eastern area. The East San Diego County MSCP Subarea Plan (ECMSCP) study area covers nearly 1.6 million acres and is bounded on the west by Ramona and the State Park areas of Descanso and Palomar Mountain, the north by Riverside County, the east predominantly by Imperial County, and the south by Mexico. Indian Reservations are excluded from the study area. The ECMSCP Subarea Plan will cover the backcountry communities of Central Mountain, Cuyamaca, Descanso, Pine Valley, Desert/Borrogo Springs, Julian, Mountain Empire, Boulevard, Jacumba, Lake Morena/Campo, Potrero, Tecate, portions of Dulzura, and Palomar/North Mountain. The purpose is to protect key sensitive plant and animal populations and habitats within this portion of the County. The ECMSCP Subarea Plan currently proposes to cover up to 254 species. The overall effect of all of the MSCP plans is the creation of a large connected preserve that addresses the regional habitat needs for a number of species. The Proposed Project, the Final Environmentally Superior Northern Route, SDG&E's "Enhanced" Northern Route, and the Final Environmentally Superior Southern Route all traverse the ECMSCP area (Figure Ap. 80-1). A draft preserve plan has not yet been developed for the ECMSCP so the impacts of the 4 composite routes on the preserve system of this subarea plan can not be preliminarily analyzed at this time; although, it is anticipated that the project that could ultimately be built may affect how the preserve is designed.

6.0 MARINE CORPS AIR STATION MIRAMAR INTEGRATED NATURAL RESOURCES MANAGEMENT PLAN (INRMP)

According to the INRMP, the Department of the Navy supports the NCCP's aims and efforts, but the conservation of sensitive biological resources at MCAS Miramar is being planned separately out of concern that the creation of preserves on Miramar, as part of the MSCP, prohibits military activities. Therefore, ecosystem management is the basis for the management of natural resources on land under Marine Corps' jurisdiction. The overall strategy for conservation and management is to 1) limit activities, minimize development, and perform mitigation actions in areas supporting high densities of vernal pool habitat, threatened and endangered species, and other wetlands and 2) manage activities and development in areas of low densities, or no regulated resources, with site-specific measures or programmatic instructions.

All of MCAS Miramar has been placed into 5 different levels of Management Areas (MAs; see Figure 5.1 of the INRMP [MCAS Miramar et al. 2006]). For planning purposes, the MAs are organized by levels based on differing resource conservation requirements and management concerns. The levels of MAs range from least sensitive Level V MA, which includes developed areas, to the most sensitive Level I MA, which includes vernal pools and associated watersheds. Conceptual wildlife corridors have also been identified on MCAS Miramar in the project area (Figure 4.5b. of the INRMP), as well as

locations of the coastal California gnatcatcher, least Bell's vireo, Del Mar manzanita, and willow monkeyflower (Figure 4.6 of the INRMP).

The following describes where the Proposed Project, the Final Environmentally Superior Northern Route, SDG&E's "Enhanced" Northern Route, and the Final Environmentally Superior Southern Route would occur in context of the MAs, wildlife corridors, and reported special status species locations.

6.1 PROPOSED PROJECT

The Proposed Project would temporarily disturb approximately 5.1 acres and would permanently impact approximately 5.2 acres on MCAS Miramar (Table Ap. 8O-1). The Proposed Project traverses 3 types of MAs along the northern border of MCAS Miramar over a distance of approximately 2.5 miles (Figure Ap. 8O-1): Level II MA (supports non-vernal pool threatened and endangered species), Level IV MA (remaining undeveloped areas), and Level V MA (developed areas). Based on preliminary engineering, this portion of the Proposed Project route would include 14 towers, 5 pull sites, and multiple short access roads along an existing transmission line ROW.

These vegetation communities occur along the Proposed Project route along the northern border of MCAS Miramar (Appendix 8A Figures Ap. 8A-23 and Ap. 8A-24 of the Draft EIR/EIS): coastal sage-chaparral scrub, coastal sage-chaparral scrub-disturbed, and developed. One special status plant species, San Diego sand aster (one individual plant), was observed near MP 135 (Appendix 8A Figure Ap. 8A-24 of the Draft EIR/EIS). This plant was observed between two tower locations and would not be affected by construction. No special status animal species were observed.

The Reconductor also traverses approximately 3 miles of MCAS Miramar but involves reconductoring the existing transmission line with some pole replacement via the use of existing access roads and some temporary pull sites—all within the existing ROW (Appendix 8A Figures Ap. 8A-27 and Ap. 8A-28 of the Draft EIR/EIS).

These vegetation communities occur along the Reconductor on MCAS Miramar (Appendix 8A Figures Ap. 8A-27 and Ap. 8A-28 of the Draft EIR/EIS): southern mixed chaparral–disturbed, coastal sage-chaparral scrub (including –disturbed), non-native grassland, disturbed habitat, and developed.

One special status plant species, Nuttall's scrub oak (6 individuals), was observed near MPs 1 and 2 of the Reconductor (Appendix 8A Figures Ap. 8A-27 and Ap. 8A-28 of the Draft EIR/EIS). None would be affected by Reconductor construction. The INRMP (Figure 4.6) indicates that Del Mar manzanita could occur along the Reconductor, although it was not observed and likely could be avoided if present.

Three special status animal species were observed on MCAS Miramar along the Reconductor (Appendix 8A Figure Ap. 8A-27 of the Draft EIR/EIS): southern California rufous-crowned sparrow, California horned lark, and white-tailed kite. None of the locations where these species were observed would be directly affected by Reconductor construction. The INRMP (Figure 4.6) does not indicate that the coastal California gnatcatcher or least Bell's vireo have been observed along the Reconductor.

The Proposed Project along the northern boundary of MCAS Miramar would cross 3 conceptual, regional, north-south wildlife corridors (Figure 4.5b. of the INRMP). However, the Proposed Project would be adjacent to an existing transmission line, so wildlife use of these corridors would not be significantly affected. The Reconductor would also cross 1 conceptual, regional, east-west wildlife corridor, 3 local/alternate routes within that regional corridor, and the Oak/Spring Canyon conceptual, regional wildlife corridor. Like the other portion of the Proposed Project, the Reconductor occurs within an existing transmission line corridor, so wildlife use of these corridors would not be significantly affected.

The Proposed Project would have limited permanent impacts to MCAS Miramar, and these impacts are

along the existing transmission line ROW. Since the project occurs along the existing ROW, animal movement through the project area would not be significantly affected. Based on the plant and animal species data and the preliminary engineering, no special status plant or animal species locations would be directly impacted by the Proposed Project. Therefore, the Proposed Project is expected to be inconsistent with the overall strategy for conservation and management in the INRMP.

6.2 FINAL ENVIRONMENTALLY SUPERIOR NORTHERN ROUTE

The Final Environmentally Superior Northern Route, like the Proposed Project, traverses 3 types of MAs along the northern border of MCAS Miramar (see discussion under the Proposed Project in Section 6.1) but over a distance of approximately 6 miles. The western approximately 3.5 miles is the Coastal Link System Upgrades Alternative Revision that involves reconductoring on existing structures with the use of existing access roads, and no vegetation would be disturbed. The Final Environmentally Superior Northern Route also includes the Reconductor (see discussion under the Proposed Project in Section 6.1). The Final Environmentally Superior Northern Route would temporarily disturb approximately 7.2 acres and would permanently impact approximately 5.3 acres on MCAS Miramar (Table Ap. 80-1).

Like the Proposed Project in Section 6.1, the Final Environmentally Superior Northern Route is not expected to be inconsistent with the overall strategy for conservation and management in the INRMP because it would have limited permanent impacts to MCAS Miramar, and these impacts are along existing transmission line ROW; animal movement through the project area would not be significantly affected because the project occurs along existing ROW; and based on the plant and animal species data and the preliminary engineering, no special status plant or animal species locations would be directly impacted.

6.3 SDG&E'S "ENHANCED" NORTHERN ROUTE

SDG&E's "Enhanced" Northern Route follows the Proposed Project route on MCAS Miramar except that it would temporarily disturb approximately 7.2 acres and would permanently impact approximately 5.3 acres of MCAS Miramar (Table Ap. 80-1). See Section 6.1 for a discussion of the biological resources along the Proposed Project route on MCAS Miramar.

Like the Proposed Project in Section 6.1, SDG&E's "Enhanced" Northern Route is not expected to be inconsistent with the overall strategy for conservation and management in the INRMP because it would have limited permanent impacts to MCAS Miramar, and these impacts are along existing transmission line ROW; animal movement through the project area would not be significantly affected because the project occurs along existing ROW; and based on the plant and animal species data and the preliminary engineering, no special status plant or animal species locations would be directly impacted.

6.4 FINAL ENVIRONMENTALLY SUPERIOR SOUTHERN ROUTE

The Final Environmentally Superior Southern Route is nearly identical to the Proposed Project on MCAS Miramar and would temporarily disturb approximately 5.2 acres and would permanently impact approximately 5.2 acres of MCAS Miramar (Table Ap. 80-1). See Section 6.1 for a discussion of the biological resources along the Proposed Project route on MCAS Miramar.

Like the Proposed Project in Section 6.1, The Final Environmentally Superior Southern Route is not expected to be inconsistent with the overall strategy for conservation and management in the INRMP because it would have limited permanent impacts to MCAS Miramar, and these impacts are along existing transmission line ROW; animal movement through the project area would not be significantly affected because the project occurs along existing ROW; and based on the plant and animal species data and the preliminary engineering, no special status plant or animal species locations would be directly

impacted.

7.0 REFERENCES

City of San Diego. 1997. Multiple Species Conservation Program, City of San Diego MSCP Subarea Plan. March.

County of San Diego and Technology Associates International Corporation. 2008. North County Multiple Species Conservation Program Revised Preliminary Draft Volume 1. February 25.

County of San Diego. 1997. Multiple Species Conservation Program, County of San Diego MSCP Subarea Plan. October.

MCAS Miramar (Natural Resources Division Environmental Management Department), Gene Stout & Associates, and Geomorph Information Systems. 2006. MCAS Miramar Integrated Natural Resources Management Plan (2006-2010) <http://www.miramar.usmc.mil/WebPages/Environmental/Int%20Nat%20Res%20Manag%20plan/h.%20CH5-INRMP%202006-2010.pdf>

Ogden Environmental and Energy Service Co., Inc. 1996. Poway Subarea Habitat Conservation Plan/NCCP.