Attachment 4.10-A: Policies Consistency Analysis

Plan or Policy	Consistent? (Yes/No)	Explanation		
County of San Diego General Plan Policy				
LU-4.6: Planning for Adequate Energy Facilities. Participate in the planning of regional energy infrastructure with applicable utility providers to ensure plans are consistent with the County's General Plan and Community Plans and minimize adverse impacts to the unincorporated County.	Yes	The Proposed Project is consistent with relevant policies, which are described in this table and contained within the County of San Diego General Plan and community plans for unincorporated and incorporated portions of San Diego County. San Diego Gas & Electric Company (SDG&E) coordinates and will continue to coordinate with the County of San Diego throughout the planning and construction of the Proposed Project.		
LU-12.4 Planning for Compatibility. Plan and site infrastructure for public utilities and public facilities in a manner compatible with community character, minimize visual and environmental impacts, and whenever feasible, locate any facilities and supporting infrastructure outside preserve areas. Require context sensitive Mobility Element road design that is compatible with community character and minimizes visual and environmental impacts; for Mobility Element roads identified in Table M-4, an LOS D or better may not be achieved.	Yes	The Proposed Project will replace existing poles within the existing corridor. Existing poles will be replaced at or close to the existing pole locations. No new corridors or facilities will be located within preserve areas. No impacts to the community character will result.		
LU-12.3 Infrastructure and Services Compatibility. Provide public facilities and services that are sensitive to the environment with characteristics of the unincorporated communities. Encourage the collocation of infrastructure facilities, where appropriate.	Yes	The Proposed Project will replace existing poles with new poles. New poles will be designed to the minimum height necessary to meet current design standards and minimize intrusion to the environment and character of the area. Telecommunication lines will be collocated on the new poles.		
East Otay Mesa Business Park Specific Plan				
Public Facilities Goal 1 - Provide infrastructure and public facilities in a planned and orderly fashion that will accommodate the planned growth in East Otay Mesa while meeting applicable County standards.	Yes	The Proposed Project includes the replacement of poles within an existing corridor, and new facilities will not be required. Existing infrastructure will be an important consideration in how future development will be accommodated, but will not impact planning for the area. The Proposed Project will be consistent with county standards, where applicable.		

Plan or Policy	Consistent? (Yes/No)	Explanation			
Otay Mesa Community Plan					
Policy 6.7-1 - Provide future utility services in the most cost effective and environmentally sensitive manner to meet the General Plan Policies PF-M.1-4. Integrate the design and siting of safe and efficient public utilities and associated facilities into the early stages of the planning and development of future projects.	Yes	The Proposed Project includes the replacement of poles within or adjacent to an existing corridor, and does not constitute new facilities. Planning and design for this facility has taken into account environmentally sensitive areas, and poles will be sited close to existing poles or within the same location, where possible, in order to avoid impacts.			
City of San Diego Multiple Species Conservation Program Subarea Plan					
1. All proposed utility lines (e.g., sewer, water, etc.) should be designed to avoid or minimize intrusion into the City of San Diego Multi-Habitat Planning Area (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.	Yes	The Proposed Project will be located within or adjacent to an existing corridor and will avoid intrusion into properties that are being reserved for open space and habitat conservation.			
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.	Yes	The Proposed Project is located within or adjacent to an existing corridor and poles will be replaced at a one-for-one ratio to avoid additional impacts to surrounding properties and habitat resources. This replacement project will avoid habitat areas and wetlands to minimize the disturbance of these resources.			

Plan or Policy	Consistent? (Yes/No)	Explanation		
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.	Yes	No new access roads are proposed. Temporary staging areas will be located on nearby properties that are already disturbed so as to avoid any impacts to habitat. Any temporary impacts will be restored to pre-existing conditions. SDG&E will implement its Subregional Natural Community Conservation Plan (NCCP) protocols for the area in order to protect and avoid habitat. ¹		
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.	Yes	The Proposed Project is in an existing utility corridor and involves the replacement of individual transmission poles. SDG&E will implement its Subregional NCCP protocols, as well as other Project Design Features and Ordinary Construction/Operating Restrictions, which are discussed in Section 4.4 Biological Resources and include biological monitoring and training of construction crews in sensitive habitat areas.		
Chula Vista General Plan Policy				
LUT 12.7 Continue to assess and mitigate the potential impacts of private development and public facilities and infrastructure to historic resources in accordance with the California Environmental Quality Act.	Yes	In accordance with the California Environmental Quality Act and guidelines provided by the California Public Utilities Commission, impacts to historic, archaeological, and paleontological resources have been assessed for the Proposed Project. In 2010, a cultural resources investigation was prepared by HDR, Inc., as described in Section 4.5 Cultural Resources. Due to the presence of previously known and newly inventoried resources in the area, there will be further monitoring during ground-disturbing activities.		

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¹ SDG&E will consult with the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW), as appropriate, for Proposed Project construction compliance with the federal and California endangered species acts, but operation and maintenance will continue to be conducted under the NCCP.

Plan or Policy	Consistent? (Yes/No)	Explanation
LUT 68.1 Ensure that services and infrastructure are adequate to accommodate development in Villages 13, 14, and 15 of the Otay Ranch GDP.	Yes	The Proposed Project generally makes the supply of electricity more reliable. The wood-to-steel replacement of poles will not impact the ability to serve future development in the Otay Ranch area.
LUT 74.1 Provide sufficient land and infrastructure to accommodate commercial and industrial uses.	Yes	The wood-to-steel replacement of poles on the Proposed Project will not impact the city's ability to serve or plan for future development in its industrial or commercial areas.
LUT 83.1 Allow limited industrial development on property east of Heritage Road and south of the Otay Valley, subject to the preparation of a master development plan that addresses appropriate street improvements; vehicular access; screening from public viewsheds; development infrastructure; protection of adjacent environmentally sensitive resources; water quality; and phasing.	Yes	The Proposed Project will not affect future development pursuant to a master development plan. The Proposed Project will improve the infrastructure in the region.