

ATTACHMENT D: LAND MANAGEMENT PLAN (LMP) POLICY CONSISTENCY ANALYSIS

LMP Policy	Applicable Resource Area	Consistency (Yes/No)	Explanation
<p><i>Goal 7.1 – Retain natural areas as a core for a regional network while focusing the built environment into the minimum land area needed to support growing public needs. (LMP Part 1)</i></p> <p>Facilities supporting urban infrastructure needs are clustered on existing sites or designated corridors, minimizing the number of acres encumbered by special-use authorizations. Special-uses serve public needs, provide public benefits, and conform to resource management and protection objectives. All uses are in full compliance with the terms and conditions of the authorization. There is a low level of increase in the developed portion of the landscape as measured by road densities; in fact, over time, the built environment is shifted away from or designed to better protect resource values.</p>	<ul style="list-style-type: none"> • Utilities 	<p>Yes</p>	<p>The Proposed Action includes the removal of existing wood poles and installation of replacement weathered-steel poles at an approximately one-to-one ratio for San Diego Gas & Electric Company’s (SDG&E’s) 69 kilovolt (kV) power lines and 12 kV distribution lines. The Proposed Action will not introduce facilities supporting infrastructure needs into areas where those uses do not currently exist, nor would it expand those uses beyond what exists currently. Thus, all currently existing natural areas will be retained, and facilities will be “clustered on existing sites.”</p> <p>The Proposed Action will utilize existing rights-of-way (ROWs) and alignments to avoid and minimize impacts to undisturbed areas. The steel poles would typically be placed in line with the existing conductors and within eight feet of the existing wood poles, except where sensitive resources were identified and avoided during preliminary design.</p> <p>In addition to retaining natural areas, the Proposed Action will allow some natural areas to be reclaimed, including the following:</p> <ul style="list-style-type: none"> • Distribution line or circuit (C) 78 would be relocated from an overland route to a route along Viejas Grade Road. • The C79 overland route would be removed and a new underground route would be located within Lookout Road from State Route (SR-) 79 to the Cuyamaca Peak communication site. • Several overhead portions of C440 would be removed and placed underground within Sunrise Highway and Laguna Campground. Approximately 0.24 mile of new 12 kV distribution line would be installed overhead along C440 to connect a segment of the replaced distribution line with the new underground line along Sunrise Highway. • Portions of C449 would be removed and an underground segment would be installed within Buckman Springs Road and Morena Stokes Road. A portion of the removed overland route for C449 would be relocated to more closely follow Morena Stokes Road to Camp Morena.

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<p><i>Lands 2 – Non-Recreation Special Use Authorizations (LMP Part 2)</i></p> <ul style="list-style-type: none"> Administer existing special-use authorizations in threatened, endangered, proposed and candidate species habitats to ensure they avoid or minimize impacts to threatened, endangered, proposed and candidate species and their habitats, cultural and scenic resources, and open space values. Efficiently administer special-use authorizations (SUAs) on National Forest System lands. Work with special-use authorization holders to better administer National Forest System land and to reduce administrative cost. Require special-use authorizations to maximize opportunities to co-locate facilities and minimize the encumbrance on National Forest System land. For special-use authorization holders operating within threatened, endangered, proposed and candidate species key and occupied habitats develop and provide information and education on the ways to avoid and minimize effects on their activities on occupied threatened, endangered, proposed and candidate species habitat. Use signing, barriers, or other suitable measures to protect threatened, endangered, proposed and candidate species in key and occupied habitats within the special-use authorization areas. 	<ul style="list-style-type: none"> Biological Resources Utilities 	Yes	<p>The Proposed Action includes several mechanisms to promote the efficient administration of the special use authorizations consistent with this LMP policy. The primary purpose of the Proposed Action is to combine over 70 prior use authorizations and easements into one Master Special Use Permit (MSUP) with uniform conditions and operation and maintenance requirements throughout the CNF. Approval of the MSUP advances this LMP goal by providing efficient administration of multiple prior special use authorizations and improved administration of National Forest System land, reducing administrative costs. In addition, the Proposed Action would require SDG&E to continue to implement the Natural Community Conservation Plan (NCCP) and ensure consistency with applicable laws and regulations to minimize and avoid potential impacts to special-status species and their habitats. SDG&E has successfully implemented the NCCP in close coordination with the United States (U.S.) Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (formerly California Department of Fish and Game) (CDFW) for construction and operation and maintenance activities within sensitive habitats for nearly two decades. The NCCP includes suitable measures to protect species within the special use authorization areas. In addition to the NCCP, implementation of the Operation and Maintenance Plan and Fire Plan will also include consistent requirements that will improve efficiency and reduce administrative costs.</p>
<p>S42: Include provisions for raptor safety when issuing permits for new power lines and communication sites (see guidelines in [Forest Plan] Appendix G). Also implement these guidelines for existing permits within one year in identified high-use flyways of the California condor, and within five years in other high-use raptor flyways. Coordinate with California Department of Fish and Game, U.S. Fish & Wildlife Service, and power agencies to identify high-use flyways. (LMP Part 3)</p>	<ul style="list-style-type: none"> Biological Resources 	Yes	<p>All 69 kV power lines and 12 kV distribution lines would be constructed in compliance with the Avian Power Line Interaction Committee’s (APLIC’s) Suggested Practices for Avian Protection on Power Lines. In addition, SDG&E would also implement its internal avian protection guidelines to reduce potential impacts to avian species from line strikes and electrocutions in these areas. All of the existing wood poles within the administrative boundary of the Cleveland National Forest (CNF) were previously surveyed to identify those that would require additional avian protection measures. Many of the poles within the CNF that were determined to require avian protection have been retrofitted to include the necessary avian protection measures, and the Proposed Action replacement poles would include the same or similar protections as the retrofitted poles and would fully comply with APLIC guidelines. SDG&E would coordinate with the USFS, CDFW, and USFWS to identify high-use flyways and implement appropriate measures.</p>
<p>S5: Treat all freshly cut live or recently dead conifer stumps with a registered fungicide to prevent the establishment of annosus root disease. (LMP Part 3)</p>	<ul style="list-style-type: none"> Biological Resources 	Yes	<p>SDG&E would treat all freshly cut live or recently dead coniferous stumps with a registered fungicide.</p>

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<p>S9: Design management activities to meet the Scenic Integrity Objectives (SIOs) shown on the Scenic Integrity Objectives Map. (LMP Part 3)</p>	<ul style="list-style-type: none"> Visual Resources 	Yes	<p>The Visual Resources Technical Report includes a detailed impact evaluation supported by a set of computer-generated visual simulations, and concludes that the Proposed Action would result in only minor, incremental changes that would not affect the intact appearance of the landscape setting within the CNF. The Visual Resources Technical Report also provides applicant-proposed measures (APMs), which have been included in the Preliminary POD as ordinary operating restrictions, to address potential impacts to aesthetics as a result of the Proposed Action. With the implementation of these APMs, the visual change would be consistent with the USFS visual management goals for the CNF and will meet the SIOs. Therefore, a decrease of more than one SIO level is not anticipated.</p> <p>A comparison of the existing views and visual simulations for the 69 kV power lines and 12 kV distribution lines demonstrates that the components would not result in a noticeable change in visual contrast with regard to line, form, or color. These simulations also indicate that the 69 kV power line and 12 kV distribution line components would not cause a perceptible deviation to the intactness of the existing landscape character. In addition, SDG&E-AES-01 calls for restoring disturbed areas to reduce the potential visual contrast with the surrounding landscape setting. The use of non-reflective conductors and self-weathering, rust-colored poles (as described in SDG&E-AES-03 and SDG&E-AES-04) will further reduce visual contrast and potential visibility.</p> <p>SDG&E is currently working to identify potential relocation options for C157 at the request of the USFS. However, where this 12 kV distribution line crosses through the Pine Creek and Hauser wilderness areas, the landscape setting does not appear unaltered and, therefore, the area does not currently achieve the SIO “Very High” visual management goal. If C157 were to remain in its current location, the existing poles would be replaced with slightly taller poles of a similar line, form, and color, and the resulting effect would not substantially alter the landscape’s appearance of intactness.</p> <p>At several other locations, including along portions of C449 and C79, the Proposed Action includes the removal of existing 12 kV distribution structures. The removal of these existing structures would result in a noticeable improvement to the existing landscape character, view, and intactness of the landscape setting. In addition, SDG&E-AES-05 includes aesthetic restoration through recontouring and revegetation in a manner that replicates the color and texture of the surrounding landscape in order to reduce the visual contrast of these areas.</p>
<p>S10: Scenic Integrity Objectives will be met with the following exceptions:</p> <ul style="list-style-type: none"> Minor adjustments not to exceed a drop of one SIO level is allowable within the Forest Supervisor's approval. Temporary drops of more than one SIO level may be made during and immediately following project implementation providing they do not exceed three years in duration. (LMP Part 3) 	<ul style="list-style-type: none"> Visual Resources 	Yes	<p>As outlined previously and detailed in the Visual Resources Technical Study, the pole replacements would result in minor, incremental changes that would not affect the intact appearance of the landscape setting within the CNF. Therefore, a decrease in more than one SIO level is not anticipated.</p>

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<p>S11: When occupied or suitable habitat for a threatened, endangered, proposed, candidate or sensitive (TEPCS) species is present on an ongoing or proposed project site, consider species guidance documents (see Appendix H) to develop project-specific or activity-specific design criteria. This guidance is intended to provide a range of possible conservation measures that may be selectively applied during site-specific planning to avoid, minimize or mitigate negative long-term effects on threatened, endangered, proposed, candidate or sensitive species and habitat. Involve appropriate resource specialists in the identification of relevant design criteria. Include review of species guidance documents in fire suppression or other emergency actions when and to the extent practicable. (LMP Part 3)</p>	<ul style="list-style-type: none"> Biological Resources 	<p>Yes</p>	<p>As noted above, the Proposed Action includes implementation of the NCCP, which includes conservation measures that are applied during site-specific planning to avoid, minimize, or mitigate negative long-term effects on species and habitat. In addition, the “Pre-Activity Survey Report” process set forth in the NCCP ensures coordination with the USFWS and CDFW resource specialists in the identification of relevant design criteria. Because the Proposed Action involves the wood-to-steel replacement of existing 69 kV power lines and 12 kV distribution lines within existing ROWs, and with the implementation of the NCCP protocols, SDG&E does not anticipate negative long-term effects on special-status species. SDG&E would include a review of species guidance documents in fire suppression or other emergency actions when and to the extent practical.</p>
<p>S12: When implementing new projects in areas that provide for threatened, endangered, proposed, and candidate species, use design criteria and conservation practices (see Appendix H) so that discretionary uses and facilities promote the conservation and recovery of these species and their habitats. Accept short-term impacts where long-term effects would provide a net benefit for the species and its habitat where needed to achieve multiple-use objectives. (LMP Part 3)</p>	<ul style="list-style-type: none"> Biological Resources 	<p>Yes</p>	<p>The Proposed Action includes wood-to-steel replacement of existing 69 kV power lines and 12 kV distribution lines; SDG&E would continue to implement the approved NCCP to ensure impacts to special-status species would be minimized during construction as well as operation and maintenance activities.</p>
<p>S18: Protect known active and inactive raptor nest areas. Extent of protection will be based on proposed management activities, human activities at the onset of nesting initiation, species, topography, vegetative cover, and other factors. When appropriate, a no-disturbance buffer around active nest sites will be required from nest-site selection to fledging. (LMP Part 3)</p>	<ul style="list-style-type: none"> Biological Resources 	<p>Yes</p>	<p>As discussed in Section 10.1 Biological Resources of the POD, SDG&E would utilize NCCP protocols 2, 3, 4, 5, 7, 8, 10, 11, 13, 14, 17, 20, 24, 25, 27, 29, 34, 35, 41, 44, 48, 50, 54, 55, and 57 to avoid impacts to special-status avian species and nesting avian species. These protocols include, but are not limited to, restricting vehicles to existing roads when feasible, conducting pre-activity nest surveys, utilizing biological resource monitors, and avoiding nesting season to the extent practicable.</p>
<p>S22: Except where it may adversely affect threatened and endangered species, linear structures such as fences, major highways, utility corridors, bridge upgrades or replacements, and canals will be designed and built to allow for fish and wildlife movement. (LMP Part 3)</p>	<ul style="list-style-type: none"> Biological Resources 	<p>Yes</p>	<p>The Proposed Action includes adoption of a MSUP and wood-to-steel replacement of existing 69 kV power lines and 12 kV distribution lines within existing alignments. These activities would not affect fish and wildlife movement. Additionally, undergrounding C79 and portions of C440 and C449 would be beneficial to wildlife movement as the overhead segments in these areas would be placed underground and out of potential flyways.</p>
<p>S24: Mitigate impacts of on-going uses and management activities on threatened, endangered, proposed, and candidate species. (LMP Part 3)</p>	<ul style="list-style-type: none"> Biological Resources 	<p>Yes</p>	<p>SDG&E will continue to implement the NCCP, which mitigates impacts of ongoing uses and management activities on species.</p>

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<p>S30: Avoid activities that result in removal, crushing, burying, burning, or mowing of host plants within critical and occupied habitat for threatened, endangered, and proposed butterfly species; unless guided differently by a species-specific consultation. (LMP Part 3)</p>	<ul style="list-style-type: none"> Biological Resources 	Yes	<p>In order to avoid and minimize potential impacts to Quino checkerspot butterfly (QCB) (<i>Euphydryas editha quino</i>), SDG&E would utilize NCCP protocols 1, 2, 3, 5, 7, 8, 10, 11, 13, 14, 17, 24, 25, 29, 34, 35, 41, 44, 48, 54, 55, and 57. These protocols include, but are not limited to: training, pre-activity surveys, monitoring during clearing and grading activities, and reducing speeds to 15 miles per hour along Proposed Action access roads to minimize fugitive dust. The Proposed Action and all associated activities are also covered by the QCB Habitat Conservation Plan (QCBHCP); as a result, SDG&E would also mitigate any potential Proposed Action effects to QCB by implementing this QCBHCP. Specifically, SDG&E would implement the protocols identified in QCBHCP Sections 3.2 Actions to Minimize Impacts and 3.3 Actions to Mitigate Impacts, which include conducting pre-activity surveys, conducting protocol-level adult Quino checkerspot butterfly flight season surveys within suitable Quino checkerspot butterfly habitat within the HCP's designated Mapped Area prior to construction and submitting the 45-day Quino checkerspot butterfly Survey Results Report to the USFWS, and mitigating for impacted habitat. In the alternative, SDG&E has the option to not complete surveys but assume presence of the species and mitigate according to established ratios established in the QCBHCP. With implementation of the QCBHCP and SDG&E's NCCP, any potential impacts to QCB from the Proposed Action would be minimized.</p>
<p>S47: When designing new projects in riparian areas, apply the Five-Step Project Screening Process for Riparian Conservation Areas as described in Appendix E – Five-Step Project Screening Process for Riparian Conservation Areas. (LMP Part 3)</p>	<ul style="list-style-type: none"> Biological Resources 	Yes	<p>As described in Section 10.4 Hydrology of the Preliminary POD, USFS-identified riparian conservation areas (RCAs) were identified and included for consideration during project design to avoid the construction of replacement steel poles within these areas, where possible. Additionally, SDG&E is working with the USFS to identify existing poles within RCAs that may have access roads that can be relocated or eliminated from these areas. In accordance with the USFS' CNF LMP Part 1 Goal 5.2, SDG&E included these areas for consideration during project design and avoided, where possible, the placement of steel poles and temporary work areas within RCAs to the extent feasible. Where resource flagging and avoidance would not completely eliminate the potential for impacts to these resources, or where construction activities would be required to some extent within the mapped boundaries of a riparian area, SDG&E would implement project-specific ordinary operating restrictions. The Proposed Action would temporarily impact approximately 8.76 acres of RCAs during construction, and would permanently impact approximately 0.05 acre of these areas from the construction of the replacement steel poles. These temporary and permanent impacts would be minor in the context of approximately 62,725 acres of identified RCAs within the Proposed Action area.</p>
<p>S60: Until proper evaluation occurs, known heritage resource sites shall be afforded the same consideration and protection as those properties evaluated as eligible to the National Register of Historic Places. (LMP Part 3)</p>	<ul style="list-style-type: none"> Cultural Resources 	Yes	<p>Known heritage resource sites would be treated as potentially eligible to the National Register of Historic Places until proper evaluation occurs.</p>

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<p>S61: Leave human remains which are not under the jurisdiction of the County Coroner undisturbed unless there is an urgent reason for their disinterment. In case of accidental disturbance of human remains, excavation of human remains, or subsequent re-internment of human remains follow national forest, federal and tribal policies. (LMP Part 3)</p>	<ul style="list-style-type: none"> • Cultural Resources 	<p>Yes</p>	<p>Should any previously unidentified prehistoric or historic artifacts; indicators or examples of cultural, archaeological, or paleontological resources; or potential human remains or funerary items be discovered during the course of site preparation, grading, excavation, construction, or other activities, all operations within 50 feet of an inadvertent discovery during such activities will cease and the Principal Investigator will contact the USFS Heritage Program Manager (HPM) and SDG&E's Cultural Resource Specialist. Once the a find has been identified and evaluated, the USFS HPM and SDG&E's Cultural Resources Specialist will determine if additional cultural resources work, including but not limited to a formal evaluation or Proposed Action redesign, are required treatment. Ground-disturbing work in the vicinity of the discovery will not resume without authorization by the USFS HPM and after the appropriate consultation has taken place.</p>
<p>CNF S6 – Place new power lines (33 kV or less), telephone lines, and television cables underground wherever possible. (LMP Part 2)</p>	<ul style="list-style-type: none"> • Utilities 	<p>Yes</p>	<p>The Proposed Action includes adoption of an MSUP for SDG&E facilities within the CNF, as well as the replacement of some of these existing facilities. No new power lines are proposed. Nonetheless, with respect to the replacement of the existing 12 kV facilities, the Proposed Action includes placement of C79 and portions of C440 and C449 underground.</p>
<p>CNF S9 – Avoid or mitigate, following consultation, activities resulting in direct trampling or erosion problems to Laguna Mountains skipper suitable and occupied habitat and adjacent areas (Laguna and Palomar Places). (LMP Part 2)</p>	<ul style="list-style-type: none"> • Biological Resources 	<p>Yes</p>	<p>As described in Section 10.1 Biological Resources of the POD, SDG&E would replace several poles within USFS-modeled occupied habitat for the Laguna Mountains skipper (<i>Pyrgus ruralis lagunae</i>) along C440. USFWS-designated critical habitat is also within the vicinity of C440. SDG&E has conducted extensive surveys within these areas and designed the Proposed Action to minimize the number of replacement poles to be constructed within these areas; SDG&E's survey data reveal that, in the currently planned pole construction locations, the likelihood of presence of the Laguna Mountains skipper is low. Although this species is not covered under SDG&E's NCCP, SDG&E would utilize NCCP protocols 1, 2, 3, 5, 7, 8, 10, 11, 13, 14, 17, 24, 25, 29, 34, 35, 41, 44, 48, 54, 55, and 57. SDG&E's protocols are expected to result in the avoidance of effects to Laguna Mountains skipper. If pre-activity surveys determine that potential effects could occur, then SDG&E would work directly with the appropriate resource agencies.</p>
<p>CNF S13 – Avoid or mitigate activities that may negatively affect San Diego thornmint (<i>Acanthomintha ilicifolia</i>) occupied habitat (Sweetwater Place). (LMP Part 2)</p>	<ul style="list-style-type: none"> • Biological Resources 	<p>Yes</p>	<p>The Proposed Action area is located within USFWS-designated critical habitat San Diego thornmint (<i>Acanthomintha ilicifolia</i>). San Diego thornmint is considered a Covered Species by SDG&E's NCCP. Therefore, with the implementation of the appropriate NCCP protocols, as described in Section 10.1 Biological Resources of the POD, impacts to San Diego thornmint would be minimized.</p>