# Appendix G Land Use Policy Matrix



# PLAN OR POLICY

### PROPOSED PROJECT EVALUATION

# Torrey Pines State Natural Reserve General Plan

Geologic Hazards – Control of Littoral Sand Movement: Construction of groins, jetties, or other artificial structures at the mouth of Los Penasquitos Creek to maintain an open lagoon mouth shall not be permitted unless it is demonstrated that such construction will not adversely affect down-coast littoral sand movement, beach recreation, or scenic resources.

The proposed project would entail removing overhead line TL666D from existing poles within Torrey Pines State Natural Reserve, including the removal of such existing structures from near the mouth of Los Peñasquitos Creek. The proposed project would help return the site to its original, unaltered conditions, and would reduce the number of structures in the lagoon that may currently adversely affect down-coast littoral sand movement, beach recreation, and scenic resources. Therefore, the proposed project is not expected to conflict with this policy.

Geologic Hazards -- Public Notice: Areas subject to potential landslides or blockfalls shall be appropriately signed to notify the public of potential hazards.

The proposed project would entail removing overhead line TL666D and poles from within Torrey Pines State Natural Reserve Extension. Torrey Pines State Natural Reserve Extension supports unique geologic features that would be evaluated in detail in a final geotechnical investigation, as required by APM GEO-02. While Chapter 5.6, Geology and Soils, of the Draft IS/MND did not identify this area as a landslide susceptible area according to the San Diego County Multi-Jurisdictional Hazard Mitigation Plan, any such hazards identified in the final geotechnical investigation would be clearly indicated during project construction to ensure safety.

Geologic Hazards -- Monitoring: A monitoring program shall be established to document development and progress of: 1) blockfalls on and adjacent to the beach, 2) landslides, 3) gully development in the main drainage of the Extension and other key localities to be identified later, 4) potholes on the bluff top, 5) pavement cracks due to settling collapse of pipes, undercutting, or faults, and 6) beach elevation and width.

The monitoring program shall be conducted by field staff, under the supervision of the Region and the Resource Protection Division. The program should involve the comparison of historical and recently flown aerial photos, ground photos with explanations, and the installation of permanent monuments, if necessary. The program should be coordinated with the neighboring city park and beach, Scripps Institution of Oceanography, San Diego State University, and other appropriate research institutions. Special plans should be formulated well in advance of storm events to document conditions at key locations during major storms.

As discussed above in response to "Geologic Hazards – Public Notice," the proposed project would entail removing overhead line TL666D from existing poles within Torrey Pines State Natural Reserve Extension. To remove these overhead lines and poles within Torrey Pines State Natural Reserve Extension, SDG&E would conduct a final geotechnical investigation of the project area per APM GEO-02. SDG&E would consider the findings of the final geotechnical investigation when determining appropriate construction activities in geologically sensitive areas. Based on the findings of the final geotechnical investigation as deemed necessary, a geological monitor would observe proposed project activities within geologically sensitive areas in California State Parks lands, including within Torrey Pines State Natural Reserve Extension.

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# Bluff Setbacks: A zone of exclusion shall be established, to include the base, face and top of all bluffs and cliffs. This zone extends inland to the intersection of the ground surface with a plane inclined 45 degrees from the horizontal from the toe of the cliff. No new structures shall be constructed within this zone unless they are either moveable or expendable. Existing facilities may remain in use subject to regular inspections by field personnel in coordination with the department's geologist. A zone of demonstration shall be established within the unit to extend inland from the zone of exclusion to the intersection of the ground surface with a plane inclined 20 degrees from the horizontal from the toe of the cliff Figure 2.

<u>Paleontological Resources</u>: <u>Permits for scientific collecting of paleontological resources shall be stringently limited, with approval required from the Resource Protection Division, to ensure coordination and protection of rare resources.</u>

# PROPOSED PROJECT EVALUATION

The proposed project would entail removing existing overhead lines and poles (TL666D) from bluff areas within Torrey Pines State Natural Reserve Extension. Existing overhead lines and pole structures are permitted within California State Parks lands and are subject to regular inspections by field personnel in coordination with the department's geologist. Removal of these structures would improve system reliability and would eliminate future maintenance needs in the area. While pole and overhead line removal would necessitate temporary construction activities near the bluffs, implementation of the proposed project would result in an overall net reduction of structures near bluffs and cliffs within Torrey Pines State Natural Reserve Extension that would not conflict with this policy.

The proposed project would entail removing existing overhead lines and poles associated with TL666D and reconfiguring Lines 674A (to be renamed TL6973), C510, and C738 to an underground configuration. Undergrounding these lines would involve trenching and excavation. Some components, such as TL666D poles within the San Dieguito and Los Peñasquitos Lagoons, would be removed by sawing them off at the base to minimize ground disturbance and this activity is therefore not expected to result in any paleontological resource disruption or discovery. Outside of the lagoons, many poles would be topped, rather than be fully removed. Poles that are topped would have portions removed, but the pole would not be entirely removed, and some existing non-project infrastructure would remain. Pole topping is similarly not expected to result in any paleontological resource discovery or disruption. However, trenching associated with reconfiguration of TL674A and conversion of lines C510 and C738 into underground orientations adjacent to, but not within, California State Parks lands, could potentially affect paleontological resources. While project activities would relate to utility work and would not directly involve collection of paleontological resources for scientific or other purposes, MM CUL-5 would require the applicant to develop a Paleontological Resource Monitoring and Discovery Plan were such resources present and discovered during project work. The measure would include adequate protections to avoid adverse effects to paleontological resources and would comply with any permit requirements required from the Resource Protection Division. Implementation of the measure would ensure that the appropriate agencies would be notified and resources, if discovered, were treated appropriately. The project would not inherently conflict with this policy.

Wildfire Prevention and Suppression: A wildfire protection plan addressing wildfire prevention and suppression shall be developed in cooperation with the responsible wildfire control agencies. The plan shall identify or describe the following: equipment and facilities needed to fight wildfires and to protect the public during fires; the location and maintenance status of fuel breaks, firebreaks, and fire access roads; procedures for

As described in IS/MND Chapter 5.8, Hazards, the wetland lagoon area from which poles supporting Line TL666D would be removed (sawed from the base and removed by helicopter) is not identified as a Very High Fire Hazard Severity Zone. However, project activities that would occur within Torrey Pines State Natural Reserve Extension's upland habitat area, including pole removal by helicopter, would be within a Very High Fire

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visitor evacuation and safety; and fire suppression methods and strategies. This plan shall be periodically reviewed and updated. Fire suppression methods used in the units shall be those, which cause the least resource damage commensurate with effective control. Post-wildfire revegetation or rehabilitation efforts shall be carried out only upon program approval by the Resource Protection Division and Region Headquarters.

Landscaping: Landscaping in developed areas of the state beach shall be done with species native to the area to the extent feasible. In order to maintain genetic integrity, native plants used for landscaping or revegetation shall be propagated only from stock on site. All efforts shall be made to use species that do not require a permanent irrigation system.

Landscaping in developed areas of the state reserve shall include only species indigenous to the site. The Guy Fleming house and the Torrey Pines Lodge shall be landscaped only with plants native to the area, and all efforts shall be made to remove exotic alien plant species now present. Landscaping around the other residences shall not include species capable of naturalizing. All landscape plans must be approved by the Resource Protection Division and Region Headquarters.

Rare and Endangered Plants: All rare and endangered plants in the units shall be protected and managed for their perpetuation. The habitats of these sensitive plants shall be enhanced where possible.

Each rare and endangered plant in the units shall be studied for the purpose of developing management criteria. Management plans shall be prepared for those species requiring special management and protection.

The known locations and potential habitat for Dudleya brevifolla shall receive no more than the lowest intensity use. Population monitoring shall be done annually to detect any adverse factors affecting the plants. Dudleya plants may not be noticed above ground seasonally or during some years when climatic conditions cause their dormancy. Documentation of these events is also important. Any development in the beach parking area shall involve on- or off-site mitigation for the perpetuation of Lotus nuttallianus. Mitigation measures shall be developed under direction of the Resource Protection Division.

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Hazard Severity Zone. Equipment with combustion engines, such as chainsaws, could present a spark risk during construction. This would not differ from recurring facility maintenance of TL666D within Torrey Pines State Natural Reserve Extension. Completion of the project, fire hazards associated with this utility, and its maintenance would be eliminated.

Project work occurring near the Torrey Pines State Beach would involve helicopter work for TL666D pole removal (sawing from the base), and equipment staging in the lay down area/fly yard in the North Beach Day Use Lot. None of these project actions would occur directly within Torrey Pines State Beach. As described in the MMRP, numerous measures have been identified and would be incorporated as part of project implementation to minimize impacts to the North Beach Day Use Lot and surrounding biological resources within Torrey Pines State Natural Reserve. Furthermore, because no grading or excavation would be required near the Torrey Pines State Beach, and because construction equipment staging is fully restricted to the paved North Beach Day Use Lot area, landscaping in developed areas is not anticipated. Further, APM BIO-03 and MM BR-5 contain strategies intended to minimize the spread of noxious and invasive weeds that could otherwise degrade existing landscaping. Therefore, the project does not appear to conflict with adopted policies addressing landscaping.

Project work within San Dieguito Lagoon, Peñasquitos Lagoon, Torrey Pines State Natural Reserve, and Torrey Pines State Natural Reserve Extension would involve the removal of poles (sawed from the base), and the removal of overhead conductor. In the lagoons, the overhead conductor would be removed and would be reeled in, and the poles would be removed by helicopter to minimize impacts. Specific surveying, monitoring, and restoration procedures have been identified and would be implemented as part of the project to minimize impacts to rare and endangered plants (see Chapter 5.4, Biological Resources, and Chapter 6.0, MMRP). These strategies include effective protections for the short-leaved dudleya (Dudleya brevifolia) and Nuttal's acmispon (Acmispon prostratus, formerly Lutus nuttallianus) from potential project-related impacts. Both shortleaved dudleya and Nuttal's acmispon are identified in the Draft IS/MND as having a "high" occurrence potential.

### PLAN OR POLICY PROPOSED PROJECT EVALUATION Interpretation and Flow of History: Any additional Given the manner in which TL666D poles within San Dieguito archeological, anthropological, or historical resources relating to and Los Peñasquitos Lagoons would be removed, project these units that may be discovered by department employees activities within these areas are not expected to result in any should be reported to the Resource Protection Division, which is discoveries or substantial, adverse effects to archaeological, responsible for maintaining a statewide inventory of the cultural anthropological, or historical resource. In the unlikely event that a resource were discovered, MM CUL-2 would require an resources of the State Park System. Any discoveries of physical features should be protected in situ if at all possible until they archaeological monitor (under the supervision of a Secretary of can be professionally described and evaluated. Interior-qualified archaeologist) be present to oversee grounddisturbing activities in all cultural resource sites of significance identified within project work areas, including those within Torrey Pines State Natural Reserve and Torrey Pines State Natural Reserve Extension. Monitoring would be carried out consistent with requirements of the Permit to Conduct Archaeological Investigations on State Park Lands. Therefore, project activities are not anticipated to interfere with the interpretation and flow of history on California State Parks lands. **Natural Settings**: The department shall provide a setting within Project work within Torrey Pines State Natural Reserve would Torrey Pines State and State Beach that, as much as possible, involve pole removal and pole topping associated with TL666D. represents natural conditions, with human influence and Pole removal would reduce the number of manmade artifacts at the site to its natural conditions, with human influence and features minimized. features in the form of utility pole infrastructure minimized. While proposed project activities would temporarily increase human influence within Torrey Pines State Natural Reserve and Torrey Pines State Natural Reserve Extension during the Line TL666D removal phase, overall, the proposed project would not conflict with natural settings within California State Parks lands, and would help restore such lands to their original conditions. Noise: The department shall coordinate with Miramar Naval Within Torrey Pines State Natural Reserve and Torrey Pines Station authorities to lessen the impact of jet noise on the State Natural Reserve Extension, the applicant would conduct [a]esthetic and natural resources of Torrey Pines State Reserve the Line TL666D pole removal via helicopter to minimize and State Beach. potential impacts to the sensitive wetland habitat within Los Peñasquitos Lagoon, and to facilitate operations in the steep topography present along the bluffs within the Extension area. While project activities would not relate to activities at Miramar Naval Station, helicopter noise emissions could interfere with the intended passive recreational use at Torrey Pines State Reserve and State Beach. However, helicopter activities would be temporary, short-term, and intermittent, occurring in a linear fashion along Line TL666D until the line and associated poles are removed. The applicant would conduct the removal in a similar fashion to past maintenance efforts on these facilities, and in coordination with Cal Parks. Upon project completion, the existing facilities would be removed from the vicinity and helicopter use would no longer be required for maintenance within Torrey Pines State Natural Reserve, and associated noise

impacts would cease to occur.

### PLAN OR POLICY PROPOSED PROJECT EVALUATION Water Quality: Responsible agencies shall be requested to Because the project would disturb more than one acre of land monitor water quality of runoff and other discharges entering the overall, the applicant would be required to obtain a SWPPP, Los Peñasquitos wetlands and make pertinent information which would help prevent and manage stormwater runoff to available to the department. The department shall evaluate the ensure that sediment does not exit work areas and degrade nearby water resources. Therefore, the proposed project would information for potential adverse effects on estuarine and wildlife resources, in consultation with the Department of Fish and Game. not conflict with water quality policies within California State Parks lands. Exotic (Alien) Plants: Exotic alien plants in the reserve shall be Within Torrey Pines State Natural Reserve and Torrey Pines controlled and removed if possible. The greatest effort shall be State Natural Reserve Extension, the applicant would conduct directed at controlling those species that easily spread and are the Line TL666D pole removal via helicopter. To remove the most conspicuous. overhead conductor, the applicant would reel the de-energized conductor across Los Peñasquitos Lagoon. To remove the poles, limited crewmembers would enter the lagoon via helicopter to saw the poles from the base. Crews would work within a limited area surrounding the existing poles. While helicopters would be used to minimize impacts to the sensitive habitat within Los Peñasquitos Lagoon, ground disturbance from removing the overhead conductor, crews walking, and the pole falling may all disturb vegetation. Noxious and invasive plants often rapidly colonize disturbed areas. If noxious and invasive plants were to grow within Torrey Pines State Natural Reserve due to project-related disturbance, it would conflict with this plan. However, mitigation strategies described in Chapter 5.4, Biological Resources, such as MM BR-5 would minimize the risk that project disturbance would spread such species. Upon project completion, the existing utility infrastructure would no longer exist within Torrey Pines State Natural Reserve. Currently, this infrastructure requires routine maintenance, which creates disturbance and therefore encourages the growth of noxious and invasive plant species. Implementation of the proposed project would eliminate the need for regular maintenance of these facilities, therefore, eliminating the potential for disturbance. Implementation of the proposed project is therefore not expected to conflict with the need to control and remove noxious and invasive plants from Torrey Pines State Natural Reserve. Wildlife Management: The department shall manage wildlife The removal of Line TL666D from Torrey Pines State Natural habitats toward a condition that as nearly as possible simulates Reserve and Torrey Pines State Natural Reserve Extension conditions that would have existed had natural ecological would help transition the habitat areas into those that would processes not been disturbed by mankind over the last 60 years. have existed prior to human disturbance. While project activities Efforts to maintain or enhance habitats which have historically such as helicopter use and pole removal would temporarily supported state and federally listed rare, endangered, or increase human disturbance within these habitat areas, upon threatened species will be considered top priority. project completion, the existing facilities would have been removed, and future disturbance associated with maintenance would no longer occur. Therefore, implementation of the proposed project is not expected to conflict with wildlife management goals and policies within Torrey Pines State Natural Reserve. Excavation and Stabilization of [Native American] In some locations, project activities may involve minor grading Weathering Sites: No further grading or landscape modification and/or excavation. However, such activities would not occur shall take place in the vicinity of recorded archeological sites within Torrey Pines State Natural Reserve, where existing poles

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unless the activity is determined to have no adverse effect or the effect is mitigated. Decisions on the management and protection of archeological values at sites in all units shall be made by department employees whose professional competence in cultural resource management has been recognized by the director.

Scenic Intrusions: Human intrusions on the natural scene shall be minimized. Facilities shall be concentrated in specific use areas and not scattered throughout the units. Facilities shall be designed to be as unobtrusive as possible.

Although it may not be practical to immediately remove all the intrusions on the reserve's scenery, it is the department's goal to ultimately remove any artificial feature from the reserve that Is unnecessary, poorly located, or irrelevant to the reserve's purposes.

All overhead utility lines serving the units should be placed underground. Trenches shall be located as close as possible to roads or in other locations where the least environmental damage will result.

# PROPOSED PROJECT EVALUATION

would be removed via helicopter to avoid ground disturbance. However, in any areas project-wide where ground-disturbing activities would occur, the applicant would be required to consult with all interested Native American groups at least 30 days prior to the start of such activities, in accordance with MM CUL-2. Therefore, the proposed project is not expected to conflict with policies pertaining to the proper treatment of Native American cultural sites within Torrey Pines State Natural Reserve.

Within Torrey Pines State Natural Reserve and Torrey Pines State Natural Reserve Extension, the applicant would conduct the Line TL666D pole removal via helicopter. To remove the overhead conductor, the applicant would reel the de-energized conductor across the lagoon area. To remove the poles, limited crewmembers would enter the lagoon via helicopter to saw the poles from the base. Crews would work within a limited area surrounding the existing poles. Because of the increased human activities and disturbance within Torrey Pines State Natural Reserve and Torrey Pines State Natural Reserve Extension during the proposed project, project activities may temporarily interfere with scenic conditions. However, upon project completion, the existing facilities would have been removed, and future disturbance to the scenic landscape associated with maintenance would no longer occur. Removing the existing utility lines and installing them underground within roadways adjacent to Torrey Pines State Natural Reserve would not conflict with scenic and aesthetic policies effective within California State Parks lands.

# Los Peñasquitos Lagoon Enhancement Plan Update, August 2016 Draft (final version not yet published)

Overall, the August 2016 Draft of the Los Peñasquitos Lagoon Enhancement Plan Update describes the baseline conditions of Los Peñasquitos Lagoon at the time the plan was prepared. It also includes policies, goals, and objectives intended to both maintain site conditions suitable for desired uses (habitat, water quality, cultural resources, public use), and, where necessary, help restore the site to pre-disturbed conditions.

Project activities would not conflict with the overall policies, goals, and objectives of the August 2016 Draft of the Los Peñasquitos Lagoon Enhancement Plan Update. Upon project completion, the existing overhead utility infrastructure would have been removed from Los Peñasquitos Lagoon.

# California Department of Parks and Recreation Department Operations Manual

Chapter 300: Natural Resources. The Natural Resources chapter (Chapter 300) of the California Department of Parks and Recreation Department Operations Manual describes the natural resource policy recommendations to be implemented at all California State Parks that support natural resources. The chapter explains that all organizations, companies, and groups conducting work in a California State Park that supports natural resources must adhere to the policies described in the manual. Policies cover topics including, but not limited to: maintaining native habitat types; restoring disturbed habitat to its prior conditions; acquiring land; identify waterbodies subject to pollution; and providing natural resource educational interpretation information.

Project activities would not conflict with the policies generally outlined in Chapter 300: Natural Resources of the California

Department of Parks and Recreation Department Operations

Manual. Overall, implementation of the proposed project would contribute to the restoration of California State Parks lands to a more natural state through the removal of man-made utility infrastructure that is currently present on park property.

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City of Del Mar Community Plan	
Community Development Objective F.4: Initiate a continuous program of replacing overhead utility distribution equipment with an underground system.	The proposed project would entail removing Transmission Line 666D from service in the city of Del Mar and converting the 12 kV C510 distribution line from an overhead to an underground configuration. While some associated aboveground distribution equipment such as fuse cabinets, pad-mounted transformers, and the like would be required, the proposed project's undergrounding of 630 feet of C738 and 3,900 feet of C510 distribution lines would generally affirm, rather than conflict with, this policy.
City of Del Mar Local Coastal Plan	
Shoreline Hazards Policy III-2: Conserve the natural character of land, water, vegetative and wildlife resources within the community by ensuring that future development minimizes the disturbance of existing or natural terrain and vegetation, and does not create soil erosion, silting of lower slopes, slide damage, flooding problems and/or cutting or scarring, through application of Beach (BOZ), Floodway (FW) and Floodplain (FP) Overlay Zone regulations.	The proposed project would use existing SDG&E rights-of-way and local city streets and establish temporary workspaces in open space areas to facilitate reconfiguration and removal activities. The proposed project would not necessitate land acquisition for development of new utilities that could substantially alter or disturb natural terrain. Some construction work would occur within sensitive environmental areas in established utility corridors and would adhere to protocols presented in Initial Study Sections 5.4, "Biological Resources," 5.9, "Hydrology and Water Quality," and others to ensure that erosion and flooding impacts would be less than significant.
Flood Hazards Policy III-11: Enhance public safety within the San Dieguito River Floodway by: a) prohibiting the construction of permanent structures or the placement of fill on either a temporary or permanent basis within designated floodway areas; b) prohibiting uses in the floodway which would constitute an unreasonable, unnecessary, undesirable, or dangerous impediment to the flow of floodwaters, or which would cause a cumulative increase in the water surface elevation of the base flood of more than one foot at any point; c) requiring proposed development to be located so as to eliminate the need for protective devises such as seawalls, riprap, retaining walls, or other flood control devices.	The proposed project would introduce temporary and permanent structures (e.g., poles) within areas designated as floodway zones. SDG&E would top over 50 poles and remove 34 poles from service within floodway-designated areas during construction. The TL666D circuit currently within the San Dieguito Lagoon would be decommissioned and replaced with underground conduit within San Dieguito Drive and Racetrack View Drive. The proposed project would remove physical infrastructure from a floodway zone, which would not constitute "unreasonable and unnecessary impediments to floodwaters." No protective flood control devices would be required.
Wetland Preservation Policy VI-3: Ensure the protection of the wetlands of the Los Peñasquitos Lagoon and San Dieguito Lagoon and their sensitive upland habitat by requiring that all development activities taking place in lagoon and upland areas, designated on the Lagoon Overlay Zone Map, conform to the wetland preservation regulations.	The proposed project would entail removal of infrastructure from the San Dieguito and Los Peñasquitos Lagoons. SDG&E would remove poles and power line as set forth in Sections 4, "Project Description," in conformance with protocols and measures presented in 5.4, "Biological Resources" and 5.9, "Hydrology and Water Quality" relating to construction activities to ensure that environmental impacts would be less than significant.
Wetland Preservation Policy VI-4: To protect the biological and visual resources of wetland areas, the City shall encourage the undergrounding of all new utility lines and new utility line extensions for projects within the Lagoon Overlay Zone when such undergrounding would not be detrimental to the wetlands or to the sensitive resources located in the upland areas adjacent to such wetlands.	The proposed project would eliminate service on the existing TL666D power line and convert C510 from overhead to underground configuration in the city of Del Mar. Implementation of the proposed project would result in the removal of entire poles and the topping of others within sensitive areas in San Dieguito Lagoon. Mitigation measures identified in Section 5.4, "Biological Resources" and Section 5.9, "Hydrology and Water

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	Quality" would minimize potential impacts associated with pole removal and modification to less-than-significant levels.
City of San Diego General Plan	
CE-B.1: Protect and conserve the landforms, canyon lands, and open spaces that: define the City's urban form; provide public vistas; serve as core biological areas and wildlife linkages; are wetlands habitats; provide buffers within and between communities; or provide outdoor recreational opportunities.	The proposed project would not require substantial grading or terraforming. The proposed project represents a reduction of physical elements in the environment through removal and reconfiguration of utilities in established areas. Poles and overhead wiring eliminated as part of the proposed project would be replaced in an underground alignment in excavated trenches where conduit would be encased in duct banks. Trenches would be filled and compacted, and surface uses would be restored, upon completion of construction. The proposed project would not substantially alter existing landforms, demonstrably obstruct public vistas, or otherwise preclude the lagoons' recreational opportunities or diminish functionality as open space buffers between communities.
CE-G.1: Preserve natural habitats pursuant to the MSCP, preserve rare plants and animals to the maximum extent practicable, and manage all City-owned native habitats to ensure their long-term biological viability.	The proposed project would not conflict with local policies, including the City of San Diego MSCP Subarea Plan, and would preserve rare plants and animals to the maximum extent possible. Construction activities would be limited in size and duration and would not result in substantial, adverse and persistent impacts. With the implementation of SDG&E's Subregional NCCP Operational Protocols and Habitat Enhancement Measures, along with the APMs identified in this Initial Study, the proposed project would not adversely affect native plant habitats and would not conflict with this policy of long-term biological viability.
LU-G.6: Require that all proposed development projects (ministerial and discretionary actions) notify the FAA in areas where the proposed development meets the notification criteria as defined by Code of Federal Regulations Title 14, Part 77.	Where poles would be topped, overall pole heights would be reduced. Where individual poles are proposed for removal, this would represent the cumulative elimination of more than 50 poles currently in the lagoon. The proposed project would not result in new or altered structures, including any with heights in excess of 200 feet above ground surface; moreover, no public use heliports or airports are present within distances requiring FAA notification per CFR Title 14. Part 77.
EP-G.7: Eliminate or minimize land use conflicts that pose a significant hazard to human health and safety.  PF-M.3: Integrate the design and siting of safe and efficient public utilities and associated facilities into the early stages of the long-range planning and development process, especially in redevelopment/urban areas where land constraints exist.  PF-M.4: Cooperatively plan for and design new or expanded public utilities and associated facilities (e.g., telecommunications infrastructure, planned energy generation facilities, gas compressor stations, gas transmission lines, electrical substations and other large scale gas and electrical facilities) to maximize environmental and community benefits. Maximize land	The proposed project would involve removal and reconfiguration of existing utility infrastructure as described in Section 4.0, "Project Description." Its implementation would be independent of other foreseeable land development projects. The proposed project's stated objectives include increasing system reliability and the safety and ecological function of sensitive areas. The proposed project is not part of or associated with any long-range planning process or development proposal. To the extent that certain land constraints described in EP-G.7 exist, these have been considered parts of existing baseline conditions and accounted for in the evaluation of potential project impacts in this Initial Study.

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use and community benefit by locating compatible / appropriate uses within utility easements/right-of-ways (e.g., passive parkland, natural open space, wildlife movement, urban gardens, plant nurseries, parking, access roads, and trails). Trails can be allowed in these easement/right-of-ways, provided proper indemnification, funding and maintenance is set forth in a written agreement between the public utility, the City, and project developer.	
EP-A.12: Protect Prime Industrial Land as shown on the Industrial and Prime Industrial Land Map, Figure EP-1. As community plans are updated, the applicability of the Prime Industrial Land Map will be revisited and changes considered.	New or reconfigured infrastructure would be constructed underground within SDG&E utility rights-of-way, local roadway rights-of-way, or temporary workspaces as described in Section 4.0, "Project Description" in the Initial Study. No new permanent right-of-way would be required for the proposed project. The proposed project would not require any amendments to land use designations to facilitate its implementation. Nor would any residents, businesses, or existing land uses be displaced or precluded because of the proposed project. No substantial, adverse land use or population impacts are anticipated.
UD-A.1: Preserve and protect natural landforms and features.  UD-A.3: Design development adjacent to natural features in a sensitive manner to highlight and complement the natural environment in areas designated for development.  UD-A.16: Minimize the visual and functional impact of utility systems and equipment on streets, sidewalks, and the public realm. a.) Convert overhead utility wires and poles, and overhead structures such as those associated with supplying electric, communication, community antenna television, or similar service to underground.	The proposed project's individual components include 69-kV electrical transmission lines and 12-kV distribution lines. These lines currently exist and span from substation to taps within defined utility corridors. Implementation of the proposed project would result in removal and reconfiguration of physical infrastructure that includes poles, conductors, and wires. To the extent that the proposed project would represent a reduction rather than addition or expansion of existing physical features form the environment, the proposed project appears to affirm rather than conflict with policies calling for the protection of natural landforms and features. Further, the visual impact of existing overhead utilities in vicinity of view sheds would be lessened relative to the amount of wiring that the proposed project would install in underground conduit. The proposed project would not conflict with these policies.
City of San Diego Torrey Pines Community Plan	
Key Policy 5: The construction of public projects shall avoid impacts to residential neighborhoods.	Persons near the proposed project's utility corridors, including those in residential neighborhoods, may be temporarily affected by work over the proposed project's 12-month construction timeframe. Effects may include intermittent traffic congestion due to temporary lane closures to accommodate construction work in road shoulders; degraded air quality from particulate matter, fugitive dust, and machinery exhaust; construction equipment noise; and access limitations or restrictions to publicly accessible parks and open spaces that would be temporarily used as construction staging areas. The intensity of these effects would fluctuate depending on particular construction activity and would be temporary and not persist once project construction is complete. Applicant measures as well as those included in the Initial Study would minimize intermittent construction-related impacts to the extent feasible.

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Key Policy 6: Public projects (utilities, roads, railroad, etc.) that cross or encroach into open space areas shall eliminate or avoid loss to biological resources, shall result in no net loss to wetlands, and shall be required to contribute to the restoration and enhancement of those open space areas.

Community Facilities Element Policy 4: Where feasible, remove or relocate public utility or facility projects from Los Peñasquitos Lagoon when improvements to these utilities are proposed.

Resource Management & Open Space Element - San Dieguito Lagoon and River Valley Policy 7: Maintain and enhance the experience of nature within the lagoon by screening present conflicting uses, prohibiting future conflicting uses, retaining natural areas and promoting an expanded water body within the lagoon.

Resource Management & Open Space Element Policy 8: Preserve and enhance all open space and wildlife corridors, especially those linking Los Peñasquitos Lagoon with Torrey Pines State Reserve Extension and the Carroll Canyon Creek Corridor.

Resource Management & Open Space Element - San Dieguito Lagoon and River Valley Policy 1: New development or expansion of existing uses adjacent to the lagoon shall not encroach into or negatively affect this open space area.

Resource Management & Open Space Element - San Dieguito Lagoon and River Valley Policy 5: Within the 100-year floodplain fringe of the San Dieguito River, fill for roads and other public improvements and/or permanent structures will be allowed only if such development is consistent with uses allowed pursuant to the A-1-10 Zone and other existing zoning, is capable of withstanding period flooding, and does not require the construction of offsite flood protective works. The following requirements should also be met:

- Existing environmentally sensitive habitat areas will not be significantly affected, and, that as a condition of development, significant new riparian corridors will be planted and maintained to function as enhanced wildlife corridors.
- The design of the development incorporates the findings and recommendations of both a site-specific and coastal watershed hydrologic study in order that the development either assures that there will be no increase in the peak runoff rate from the fully developed site, and neither

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The proposed project would remove electrical pole and wire infrastructure from the San Dieguito and Los Peñasquitos Lagoons, as well as from the Torrey Pines State Reserve Extension. Establishing a new TL674A circuit as part of the proposed project allows for TL674A infrastructure to be eliminated, which also obviates the need for future maintenance and repair on that line, which reduces service-related access needs to natural and managed habitats. The Initial Study identifies the potential for temporarily impacts to sensitive areas during construction. APMs and mitigation measures in Section 5.4, "Biological Resources," such as those that require preconstruction surveying, training, monitoring animal and plant species, and screening construction lighting, would reduce potential impacts to less-than-significant levels.

The proposed project would convert a portion of the existing distribution infrastructure within the San Dieguito Lagoon to an underground configuration within adjacent San Dieguito and Racetrack View Drives. The undergrounding of utilities would not encroach into the lagoon or river valley. The proposed project would not conflict with this policy.

Project construction activities would occur in disparate areas to accommodate temporary work at pole locations within the lagoon. MM BR-1 and MM BR-2 set forth requirements for the applicant to conduct preconstruction surveys and designate workspace boundaries in order to minimize impacts to sensitive habitat areas. MM BR-3 requires restoration of habitat at ratios cited in the County of San Diego Biology Guidelines for Impacted Natural Communities outside of the MSCP.

The proposed project would not involve any temporary or permanent structures within areas designated as floodway zones. SDG&E would top several poles within areas designated as floodway during construction. Existing infrastructure within the San Dieguito Lagoon would be converted to an underground configuration within San Dieguito Drive and Racetrack View Drive. Once removal of the infrastructure is complete, SDG&E maintenance crews would no longer need ongoing access, which would eliminate maintenance work within the environmentally sensitive areas. Section 5.4, "Biological Resources" and Section 5.9, "Hydrology and Water Quality"

PLAN OR POLICY	PROPOSED PROJECT EVALUATION
significantly increase nor contributes to downstream bank erosion and sedimentation, including wetlands, lagoons, and other environmentally sensitive habitat areas.	include mitigation measures that would minimize such potential impacts and no policy conflicts are anticipated.
<ul> <li>There will be no significant adverse water quality impacts to downstream wetland, lagoon and other environmentally sensitive habitat areas.</li> </ul>	
Resource Management & Open Space Element - Los Peñasquitos Lagoon Policy 2: Any future improvements to the railroad, roads or utilities traversing Los Peñasquitos Lagoon shall be designed to enhance the health and ecological value of the lagoon as recommended in the Los Peñasquitos Lagoon Enhancement Plan and Program.	Following construction, SDG&E would restore all areas that are temporarily disturbed by the proposed project to preconstruction conditions. Section 5.4, "Biological Resources" includes mitigation measures that would minimize such potential impacts. The proposed project would not conflict with the policy.
Resource Management & Open Space Element - Los Peñasquitos Lagoon Policy 10: Applicants for the coastal development permits for projects located in the watershed of Los Peñasquitos Lagoon shall, in addition to meeting all other requirements, enter into an agreement with the City of San Diego and the State Coastal Conservancy as a condition of development approval to pay a Los Peñasquitos watershed restoration and enhancement fee to the Los Peñasquitos Lagoon Fund for restoration Los Peñasquitos Lagoon and watershed.	As described in Chapter 4.0, "Project Description," SDG&E would obtain necessary Coastal Development Permits and would comply with all applicable requirements. The proposed project would be not be inconsistent with the policy.
Resource Management & Open Space Element - Torrey Pines State Reserve Extension Policy 1: New development, both public and private, shall not encroach into or negatively impact the Reserve Extension. Adequate buffer areas and appropriate landscaped screening shall be provided and maintained between development and the Reserve Extension to avoid significant visual and erosion impacts from construction.	The proposed project would remove TL666D from service within the Torrey Pines State Reserve. Once removal of the infrastructure is complete, maintenance crews would no longer need ongoing operational access, which would eliminate maintenance work in the environmentally sensitive area. Section 5.4, "Biological Resources" includes measures that would minimize such potential impacts and with these measures, no significant visual or erosion impacts are anticipated.
Resource Management & Open Space Element - Torrey Pines State Reserve Extension Policy 3: Future development adjacent to the Torrey Pines Reserve Extension area shall provide for adequate buffer areas. Development proposals shall provide adequate setbacks to avoid significant erosion, visual, or sediment impacts from construction. Setbacks also shall be provided to prevent the necessity of firebreaks being constructed on reserve property.	Approximately 0.51 miles of transmission line 666D would be removed from the Torrey Pines State Reserve Extension, which would eliminate the need for ongoing operation and maintenance work in this area. No new development that would necessitate buffers or setbacks is proposed, and thus no erosion or sediment impacts associated with the proposed project is anticipated.
Local Coastal Program Hillsides Policy 1: To protect the scenic and visual qualities of the site as seen from public vantage points, recreational areas, and roads or highways, the proposed development shall minimize the alteration of natural landforms and create only new slopes that are topographically compatible with natural landforms of the surrounding area.	Workspaces would be visible from some public viewpoints during construction of the proposed project and would consist of equipment, machinery, and construction crews. These types of views would be temporary and would neither represent permanent additions to the landscape that would adversely affect the area's visual character. To the contrary, the proposed project would result in the removal of existing infrastructure from San Dieguito Lagoon, Los Peñasquitos Lagoon, and Torrey Pines Extension, which could be considered beneficial in terms of views and visual quality. The proposed project would not conflict with this policy.

# PLAN OR POLICY

Local Coastal Program Wetlands/Environmentally Sensitive Resources Policy 1: The diking, filling, or dredging of open coastal waters, wetlands, estuaries, and lakes shall be permitted where there is no feasible, less environmentally damaging alternative, where feasible mitigation measures have been provided to minimize adverse environmental effects, and shall be limited to the following newly permitted uses and activities: 1. Incidental public service purposes, including, but not limited to, burying cables and pipes or inspection of piers and maintenance of existing intake and outfall lines.

Buffer zones sufficient to protect wetlands shall generally be 100 feet in width, unless the applicant demonstrates that a smaller buffer will protect the resources of the wetland based on sitespecific information including but not limited to the type and size of the development and/or proposed mitigation which will also achieve the purposes of the buffer. The California Department of Fish and Game and the U.S. Fish and Wildlife Service shall be consulted in such buffer determinations and their comments shall be accorded great weight by the City of San Diego and by the California Coastal Commission. Developments permitted in wetland buffer areas shall be limited to access paths, passive recreational areas, fences and similar improvements necessary to protect the wetland, and such improvements shall be restricted to the upper/inland half of the buffer zone. Developments shall be located so as not to contribute to increased sediment loading of the wetland, cause disturbance to its fish and wildlife values, or otherwise impair the functional capacity of the wetland.

Local Coastal Program Wetlands/Environmentally Sensitive Resources - Development in Floodplain Areas: Within the 100-year floodplain fringe of the San Dieguito River, fill for roads and other public improvements and/or permanent structures will be allowed only if such development is consistent with uses allowed pursuant to the A-1-10 Zone and other existing zoning, is capable of withstanding periodic flooding, and does not require the construction of off-site flood protective works. The following requirements shall also be met:

Existing environmentally sensitive habitat areas will not be significantly affected and, that as a condition of development, significant new riparian corridors will be planted and maintained to function as enhanced wildlife corridors. Such revegetation program shall, to the maximum extent feasible, utilize native vegetation and shall be designed and implemented by a professional landscape architect, biologist, or other qualified professional in close consultation with the Department of Fish and Game and the U.S. Fish and Wildlife Service.

The design of the development incorporates the findings and recommendations of both a site-specific and coastal watershed

# PROPOSED PROJECT EVALUATION

The proposed project would remove infrastructure from sensitive environmental areas, such as the San Dieguito Lagoon and the Los Peñasquitos Lagoon. Once removal of the infrastructure is complete, SDG&E maintenance crews would no longer need ongoing access, which would eliminate maintenance work within the environmentally sensitive areas. Section 5.9, "Hydrology and Water Quality" and Section 5.4, "Biological Resources" include measures that would minimize such potential impacts. The proposed project would not conflict with this policy.

No permanent aboveground structures or facilities would be constructed within a 100-year flood hazard area. Therefore, this policy is not applicable to the proposed project.

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hydrologic study in order that the development either assures that there will be no increase in the peak runoff rate from the fully developed site over the greatest discharge that would occur from the existing undeveloped site as a result of the intensity of rainfall expected during a six-hour period once every ten years, and neither significantly increases nor contributes to downstream bank erosion and sedimentation, including wetlands, lagoons, and other environmentally sensitive habitat areas.	
Local Coastal Program Wetlands/Environmentally Sensitive Resources - Development in Areas of Sensitive Vegetation: In addition, to the extent applicable, all new development within the coastal zone shall be designed to be consistent with multispecies and multi-habitat preservation goals and requirements as established in the statewide Natural Communities Conservation Planning (NCCP) Program, and shall comply with the City of San Diego MSCP Interim Habitat Loss Permit Process, or shall obtain an incidental take permit under Section 4d, Section 7 or Section 10a of the Endangered Species Act related to the California Gnatcatcher. Compliance with these goals and requirements shall be implemented in consultation with the United States Fish and Wildlife Service and California Department of Fish and Game.	The SDG&E Subregional NCCP protocols and any requirements included in identified regional and local conservation plans would be implemented as necessary to avoid and/or minimize potential construction-related impacts. SDG&E would coordinate with the personnel indicated in the Mitigation Monitoring and Reporting Program to implement operational protocols and mitigation measures as specified in this Initial Study and the SDG&E Subregional NCCP. Implementation of the measures identified in this Initial Study and Subregional NCCP as applicable would reflect general conformity with this policy.
Los Peñasquitos Watershed Restoration/Enhancement Fee: Applicants for coastal development permits for projects located in the watershed of Los Peñasquitos Lagoon shall enter into an agreement with the City of San Diego and the State Coastal Conservancy as a condition of development approval to pay a Los Peñasquitos watershed restoration and enhancement fee to the Los Peñasquitos Lagoon Fund for restoration of the Los Peñasquitos Lagoon and watershed Mitigation measures for development or fill within the lagoon shall include, at a minimum, either acquisition of equivalent areas of equal or greater biological productivity, or opening equivalent areas to tidal action.	As described in Chapter 4.0, "Project Description," SDG&E would obtain necessary Coastal Development Permits and would comply with all applicable requirements. The proposed project would not conflict with the policy.
City of San Diego Torrey Hills Community Plan	
Community Facilities Element Policy 2: Ensure that adequate utility services and infrastructure are expanded and phased in accordance with community development.	The proposed project's stated objectives are to address the safety, environmental quality, and reliability of the local area electrical network. As described in Initial Study Section 5.13 Population and Housing, the proposed project would not induce population growth or community development. Therefore, this policy is not applicable to the proposed project.
Community Facilities Element Policy 9: Encourage the design of utility facilities, which are aesthetically and environmentally sensitive. This includes, to the degree financially feasible, locating utility lines of 69 kV and below, underground, and screening large, concrete-lined drainage channels and the SDG&E substation facilities.	During construction, views of several work areas would be visible from public viewpoints. These views would be temporary and would not constitute a substantial or adverse impact to the area's visual character. Moreover, as previously discussed, the proposed project represents the removal of manmade elements from open space areas. Within the TL666D corridor, the proposed project's 13 poles would be completely removed and five poles would be topped 1 foot above the distribution level. In

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PLAN OR POLICY	PROPOSED PROJECT EVALUATION
	total, the proposed project would result in the removal of 34 poles from service and the topping of 51 poles. Then, existing infrastructure within the San Dieguito Lagoon would be converted to an underground configuration within San Dieguito Drive and Racetrack View Drive. The proposed project would generally advance this policy objective.
Community Facilities Element Policy 12: The land uses should be as compatible as possible with existing utility uses that occupy the site.	The proposed project would entail removal and reconfiguration of existing utilities and would not conflict with or substantially alter the character of the vicinity. Surrounding land uses are expected to continue to interrelate with another as they currently do without disruption or division of surrounding communities. The proposed project would therefore not conflict with this policy.
Community Land Use Development in Areas of Sensitive Vegetation Policy 1: Development in areas of sensitive vegetation, such as coastal sage scrub, shall be in accord with the City's Resource Protection Ordinance as appropriate.	Approximately 0.09 miles of the TL666D removal would be in the Torrey Hills Community planning area. The applicant has included APMs and particular construction methods and has identified work areas to avoid impacts to special-status plant species. For helicopter pole removal operations, removal methods would be dictated by flight safety. Poles that are identified for removal would be felled away from water bodies, retrieved through the use of a collar that would encircle the pole, and then hoisted out of the lagoon and flown to a fly yard where the pole would be disengaged from the aircraft and disposed of as outlined in Section 4. Project Description.  Construction areas would be limited to areas that are currently paved, developed, or disturbed in order to minimalize the proposed project's construction footprint to locations where special-status plant species might be present. In the event that proposed project activities (e.g., stringing sites, pole work areas, and staging areas) may temporarily disturb sensitive vegetation, SDG&E would restore affected areas to pre-construction
	conditions. Section 5.4, "Biological Resources" includes measures that would minimize potential impacts to sensitive vegetation. The proposed project would not conflict with this policy.
Community Land Use Development in Areas of Sensitive Vegetation Policy 3: In addition, to the extent applicable, all new development within the coastal zone shall be designed to be consistent with multi-species and multi-habitat preservation goals and requirements as established in the statewide Natural Communities Conservation Planning (NCCP) Program, shall comply with the City of San Diego MSCP Interim Habitat Loss Permit Process, or shall obtain an incidental take permit under Section 4d, Section 7 or Section 10a of the Endangered Species Act related to the California gnatcatcher. Compliance with these goals and requirements shall be implemented in consultation with the U.S. Fish and Wildlife Service and California Department of Fish and Game.	In addition to measures identified in Section 5.4, "Biological Resources" and others in this Initial Study, the proposed project would implement SDG&E Subregional NCCP protocols and any requirements included in the identified regional and local conservation plans as applicable to avoid and/or minimize potential impacts resulting from construction. SDG&E would coordinate with the personnel indicated in the Mitigation Monitoring and Reporting Program to implement operational protocols and mitigation measures as specified in this Initial Study and the SDG&E Subregional NCCP. Implementation of the measures identified in this Initial Study and Subregional NCCP as applicable would reflect general conformity with this policy.

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PLAN OR POLICY	PROPOSED PROJECT EVALUATION
City of San Diego Via De La Valle Specific Plan	
Coastal Element Compatible Land Use 5: Utilities shall be placed underground.	The proposed project would underground approximately 4,430 linear feet of overhead electrical distribution line and would not conflict with this policy.
City of San Diego Multiple Species Conservation Program	

Policy 1 Roads and Utilities: All proposed utility lines should be designed to avoid or minimize intrusion into the MHPA. These facilities should be routed through developed or developing areas rather than the MHPA, where possible. If no other routing is feasible, then the lines should follow previouslyexisting roads, easements, rights of way, and disturbed areas, minimizing habitat fragmentation.

Policy 2 Roads and Utilities: 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 City of San Diego MSCP Subarea Plan covered species, and wetlands. If avoidance is infeasible, mitigation will be required.

**Policy 3 Roads and Utilities**: 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.

Policy 4 Roads and Utilities: 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 pertinent information and be readily available to crews in the field. Training and construction crews and field workers must be conducted to ensure that all conditions are met. A responsible party must be specified.

Policy 8 Roads and Utilities: For the most part, existing roads and utility lines are considered a compatible use within the MHPA and therefore will be maintained. Exceptions may occur where underutilized or duplicative road systems are determined not to be necessary as identified in the Framework Management Section 1.5.

**Policy 1 Materials and Storage**: Prohibit storage of materials (e.g., hazardous or toxic, chemicals, equipment, etc.) within the MHPA and ensure appropriate storage per applicable

The proposed project would remove infrastructure from sensitive environmental areas, such as the San Dieguito Lagoon and the Los Peñasquitos Lagoon. Once removal of the infrastructure is complete, SDG&E maintenance crews would no longer require ongoing access, which would reduce disturbance to natural habitats. The proposed project would not conflict with these policies.

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regulations in any areas that may impact the MHPA, especially due to potential leakage.	
Policy 3 Land Use Adjacency Guidelines Policies (Direct Lighting Away from MHPA): Lighting of all developed areas adjacent to the MHPA should be directed away from the MHPA. Where necessary, development should provide adequate shielding with non-invasive plant materials (preferably native), berming, and/or other methods to protect the MHPA and sensitive species from night lighting.	
Policy 4 Land Use Adjacency Guidelines Policies (Minimize Noise Impacts): Uses in or adjacent to the MHPA should be designed to minimize noise impacts. Berms or walls should be constructed adjacent to commercial areas, recreational areas, and any other use that may introduce noises that could impact or interfere with wildlife utilization of the MHPA. Excessively noisy uses or activities adjacent to breeding areas must incorporate noise reduction measures and be curtailed during the breeding season of sensitive species. Adequate noise reduction measures should also be incorporated for the remainder of the year.	

Key:

APM = applicant-proposed measure CFR = Code of Federal Regulations

FAA = Federal Aviation Administration

IS/MND = Initial Study/Mitigated Negative Declaration

kV = kilovolts
MHPA = Multiple Planning Habitat Area
MM = Mitigation Measure
MMRP = Mitigation Monitoring and Reporting Plan
MSCP = Multi-Species Conservation Program

NCCP = Natural Communities Conservation Plan

SDG&E = San Diego Gas & Electric